
Elliott State Forest Management Plan Public Comments Reponses:December 2005

Topic *Herbicides/Fertilizers*

Sub-topic

Scope **FMP**

Comment Number 86

Stop herbicide spraying immediately. For human health reasons, stop using known harmful substances on our properties, drinking water, ground water, and skin.

Response

The responsible use of herbicides is an important tool for achieving goals for managing upland forests. In applying herbicides, all label and Forest Practices Act requirements are followed. The current restrictions, application standards, and monitoring program associated with herbicide and fertilizer applications are considered by ODF to be sufficient to provide resource protection. Typically on the Elliott, herbicides are applied once or sometimes twice over the rotation length of a stand. The Elliott Watershed Analysis provides a synopsis on the effectiveness of BMPs to protect fish and other aquatic biota. It suggests that the risk for contamination is at very low levels. For example the concentrations observed in studies of drift contamination equate to less than 0.001 - 0.03% of concentrations considered to be acutely toxic to fish (Rashin and Graber 1993, and Dent and Robben 2000).

Eliminating herbicide use would result in low survival and reduced growth of conifers, due to competition from brush. Replacing herbicide application with mechanical, labor intensive methods would significantly increase costs, and may need to be repeated two or three times. Discontinuing the limited herbicide program would result in an increase in costs and reduced revenue for the Common School Fund.

BMPs designed to minimize risks to streams and humans include but are not limited to:

- No spray buffer zones are established around streams.
- Use of half boom techniques when applying herbicides near stream side buffers forces the active boom downward and results in little scatter to the side.
- All spray mixing and handling is done on landings away from stream channels.
- Spraying occurs only on calm dry days in order avoid drift contamination or wash off of spray from rain.

Suggestions for studies to monitor cumulative effects and the potential for site-specific stream contamination will be evaluated and prioritized in the context of the overall adaptive management plan.

References

Rashin and Graber. 1993. Effectiveness of best management practices for aerial application of forest pesticides. TFW-WQ1-93-001-127 pp.

Dent and Robben. 2000. Oregon Department of Forestry: aerial pesticide applicaton monitoring final report. Oregon Departemtn of Forestry, Salem OR.
http://oregon.gov/ODF/PRIVATE_FORESTS/docs/fp/ChemAppFinal.pdf

Elliott State Forest Management Plan Public Comments Responses: December 2005

Comment Number 101

ODF should immediately discontinue the use of fertilizers and herbicides. Herbicides are especially harmful to salmon streams. Herbicides unintentionally kill stream invertebrates that are the main food source for Salmon and Steelhead. How are fish to survive when they cannot eat because their food has been killed to save a few dollars cutting brush. Perhaps ODF should reconsider clearcut harvest which requires massive brush management when stands are young and instead selectively harvest which would reduce or eliminate the need for brush management.

Response

Over 90% of the lands managed by the Coos District are Common School Lands. The mandate for these lands is to maximize revenue to the Common School Fund over the long term. This requires diverse silvicultural techniques, including clearcuts. For shade-intolerant species such as Douglas-fir, clearcutting is generally the most economical and silviculturally appropriate harvest method. Clearcuts are modified in the draft plan to retain habitat features such as large green trees, snags, and down wood.

In addition to achieving timber volume goals, providing a range of stand structures across the landscape emulates the natural range of variability. Clearcut and partial harvests across the landscape provide a range of patch sizes and habitats. Openings in the forest benefit many species, from western bluebirds to deer and elk. This variety is similar to the natural range of disturbances produced by wind, fire, flood, and native insects and diseases.

Clearcuts are a silvicultural tool that can be used in some stands to create a desired future condition of complex structure more rapidly for example, in a densely-grown stand where the trees have small crowns and little capacity to respond to thinning, or where a layered condition can be reached more quickly by clearcutting patches to release understory trees. Clearcuts may also be the best option for managing diseased patches such as *Phellinus weirii* (root rot) or Swiss needle cast infested stands.

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Comment Number 163

To adequately protect salmon, no pesticides or herbicides can legally be used within the aquatic zone, stream bank zone, inner RMA zone or outer RMA zone.

Response

It is planned that herbicides and pesticides could be used under the plan in compliance with the Forest Practices Act and in accordance with the label directions.

Comment Number 176

The ODF should limit the amount of chemicals that are aerial-sprayed on the Elliott annually. The 2005 FMP/HCP would allow the spraying herbicides on over 800 acres, and who knows how many acres of fertilizers annually. The ODF should at least do a cumulative effect evaluation of fertilizers and herbicides, especially in watersheds that supply household drinking water. We have attached our Scoping Comments to the USFW on the Elliott State Forest HCP DEIS, June 23, 2005. Please consider our comments on Fertilizers and Herbicides in the attached Scoping Comments to the USFW on the Elliott State Forest HCP DEIS, June 23, 2005.

Response

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