



**Northwest Office**

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April 27<sup>th</sup>, 2016

Forest Practices Board  
1111 Washington St. SE  
PO Box 47012  
Olympia, WA 98504-7012

**RE: Statement in Support of the Petition for New Forest Practices Rule Relating to Notice and Post-Operation Reporting for Aerial Spraying of Forest Chemicals**

Defenders is a national non-profit organization founded in 1948 whose mission is to protect and recover imperiled species native to North America and the habitat they need to survive and thrive. Defenders has staff working in Washington DC and six field offices including Seattle, Washington. Nationally, Defenders has over 1.2 million members and supporters. In Washington State, we represent over 24,000 members and supporters.

For years, Defenders and its members have advocated for responsible management forest lands to protect forest ecosystems and wildlife that depend upon those ecosystems. Defenders and its members have an interest in ensuring that proposed forest activities are conducted in a manner that do not threaten the survival of native wildlife. Forest chemical use on private lands could significantly impact the health and safety of property owners as well as damage ecosystems and the wildlife that utilize those ecosystems if not responsibly managed.

In addition to direct mortality, forest wildlife suffer from sub-lethal, indirect, and cumulative effects from forest chemicals depending upon the season, their life stage, and chemical used. The effects of chemical mixtures and inert ingredients are largely unknown, but common in practice. Some research has indicated that forest chemicals are more toxic to wildlife in combination with inert ingredients (surfactants).

Forest species of conservation need and attention, possibly impacted by forest chemicals that would benefit from more transparency in forest chemical use depending upon season, include, but are not limited to 26 federally listed endangered and threatened Pacific salmon and steelhead. In 2004, a court order spurred EPA to determine that there may be effects to one or more of the listed Pacific salmon or steelhead and therefore initiated consultation with the NMFS (EPA Docket ID: OPP-2004-0037), which is ongoing.

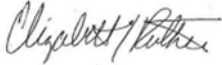
Additional species of concern for Defenders include Northwest forest amphibian species. Globally, amphibians are declining from habitat destruction and other increasing anthropogenic stressors like increased chemical use across the landscape. Amphibians are particularly vulnerable to chemicals in the environment because they breathe through their skin, resulting in virtually no barrier to chemical uptake when they come in contact with the substance. The chemicals in pesticides may affect amphibians by direct application (overspray), runoff, saturated soil, or can leach/diffuse from vegetation and soils into water. Sub-lethal effects include impaired growth and development, deformities, and behavioral alterations that lead to a decrease in survival and reproduction in

combination with environmental stressors, ultimately impacting a given population's success.

Thus, Defenders supports the petition to determine with more accuracy which chemicals are being applied, when, and with what frequency. This information will help illuminate whether forest wildlife are being exposed at particularly sensitive life history stages and how frequently they are exposed to forest chemicals. Ultimately, this information will help forward responsible stewardship of the wildlife that call Washington forests home.

Thank you for considering the petition.

Sincerely,

A handwritten signature in cursive script, appearing to read "Elizabeth Ruther".

Elizabeth Ruther  
NW Representative-Washington

