



NORTHWEST CENTER FOR
ALTERNATIVES TO PESTICIDES

April 26, 2016

Forest Practices Board

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To Members of the Forest Practices Board,

The Northwest Center for Alternatives to Pesticides (NCAP) respectfully submits this letter in support of its petition for a new rule regarding the application of forest chemicals.

The Northwest Center for Alternatives to Pesticides is a non-profit 501 (c) 3 organization working in Washington, Oregon, Idaho, northern California, and western Montana. NCAP's mission is to protect community and environmental health and inspire the use of ecologically sound solutions to reduce the use of pesticides. NCAP has worked for nearly 40 years to advance alternatives that reduce pesticide use, especially in environments where vulnerable populations are at increased risk of exposure, including low-income communities. NCAP supporters and members live and work in areas near commercial forestland and bear risk of forest chemical exposure. NCAP is petitioning the Forest Practices Board for a new rule that will improve the information available regarding forest chemicals because we believe that such a rule would further NCAP's mission of protecting community health. Residents armed with sound information can take simple precautionary measures to protect themselves and their pets, and can communicate with landowners to discuss mutually beneficial solutions.

Washington residents have a right to a healthy environment where they live, learn and work. Synthetic chemical pesticides are known to have adverse effects on community and environmental health and are linked to developmental delays in children (Kroger et al, 2005). We support efforts to improve notification and reporting of forest chemical spraying in order to increase transparency and facilitate better communication between landowners and the public through improved public notice and reporting. Additionally, schools in Washington need protection from pesticide spray drift from both agricultural and forest applications (Alarcon, Walter A et al, 2005). There is limited oversight, monitoring, and reporting of forest chemical use in the current regulatory framework.

The need to protect human and community health from drift is well documented and there are multiple cases in Washington where drift has caused acute health impacts for workers and residents. In April 2014, workers in Douglas County that were adjacent to properties being sprayed were exposed to drift by neighboring farms and experienced serious health effects. All of the workers reported two or more symptoms consistent with those caused by the pesticides applied to the pear orchard. Sixteen workers sought medical care. Based on a study of the incident, the most commonly reported symptoms were neurologic (100%) (e.g., headache and paresthesias), gastrointestinal (95%) (e.g., nausea), ocular (85%)(e.g., eye pain/irritation), and

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respiratory (80%)(e.g., upper respiratory irritation and dyspnea). According to the incident report, if there had been prior notification of pesticide use, injury would likely have been preventable (Calvert, Rodriguez, & Prado, 2015).

In addition, robust pesticide research by the University of Washington found the biggest concerns were specific to pesticide drift because pesticides do not stay where they are sprayed. The Washington Aerial Drift study found “spray drift occurring despite adherence to general precautionary pesticide application guidelines.” This 2002 research analyzed a routinely scheduled aerial organophosphorus pesticide application of methamidophos in central Washington State. According to the research, led by University of Washington researcher Ming-Yi Tsai, “the sprayed potato crop surrounded a rural agricultural community where residences were within 200 meters of the sprayed fields. Modeling pesticide spray drift is critical for exposure assessment of the residential population (Tsai, et al., 2005)”. We lack this type of research in the forest setting because pesticide use, while it may be recorded, is not reported.

Information about scheduled pesticide application is critical to preventing harmful exposure. Thank you for the opportunity to submit these comments on behalf of nearly 14,000 NCAP members and supporters.

Regards,

Megan Dunn,
Healthy People and Communities Program Director,
Northwest Center for Alternatives to Pesticides (NCAP)

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