

February 9, 2011

Dear Ms Matzke,

I was pleased to learn that DEQ is taking much needed action to reduce the amounts of identified poisons in our water and fish. Realistic limits that allow us to eat fish regularly are essential for public health.

Current Forest Practice Act regulations clearly do not keep herbicides out of streams. Spraying directly into small creeks is perfectly legal as long as water is not flowing at the time of application. No matter that these streams often flow below ground level in the driest months and enter fish bearing waterways a few feet from the applications. In addition, no independent ground-truthing is required to verify that the streambeds are truly dry at the time they are sprayed.

Riparian set-back requirements need to be established that actually keep these toxins out of streams. Simply finding a dry day and assuming that there is no air born drift and no water transport of these chemicals is truly a head-in-the-sand approach. Testing using POCIS one-month duration test strips (as is being done by EWEB) would be a good start to tell how much herbicide from forestry is entering the waters of Oregon. Then increase set-backs until the amounts found drop to safe levels.

I urge you to adopt truly safe limits for dangers chemicals and to consider the likelihood that some chemicals multiply their effects. In addition, limits for chemicals should be lower when multiple toxins are present.

Sincerely,



Nancy Nichols
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