



LEAGUE OF WOMEN VOTERS®
OF OREGON

April 4, 2013

To: Senate Rural Communities and Economic Development
Senator Arnie Roblan, Chair
Members of the Committee

Re: SJM 10 – Transfers 1.6 million public acres to private land use rules – Opposed as written

The League of Women Voters is a grassroots nonpartisan, political organization that encourages informed and active participation in government. The League has studied land use issues since 1959, and has strong positions in support of Oregon's statewide land use planning system with local implementation.

According to the League of Women Voters of Oregon's land use positions, the League supports policies that promote both conservation and development of land as a natural resource, in accordance with Oregon's land use goals. In particular, the League believes:

Consideration of accurate information concerning water availability and quality should be a prime factor when making land use decisions.

Also, according to the League's water policy position, "The League of Women Voters of Oregon believes that water is a resource that should be managed for the benefit of the public and as sustainable habitat for all life forms. The League supports Oregon state policies and statutes that promote comprehensive long range planning for conservation and management of ground and surface water and the improvement of water quality. Regulating agencies that govern the protection and conservation of water should be transparent and provide the public easy access to information."

And "The League believes that the interdependence of land use planning and water planning must be recognized and required at all levels of government:

1. Local comprehensive plans, watershed plans, basin plans, state and regional plans should be coordinated and complementary.
2. Roles and responsibilities of all decision makers and agencies affecting water resource and quality issues should be clearly defined."

Furthermore, the League opposes degradation of all of Oregon's surface and ground water. The League supports policies and legislation that integrate water quality into resource management and include but are not limited to standards for: "... Agricultural,

municipal, forestry and industrial wastewater discharge and runoff.”

We are concerned that SJM 10 does not provide enough protection against stream and non-point pollution of the 1.6 million acres proposed to transfer to the oversight of the Oregon Forest Practices Act (OFPA). **The current budget of the Department of Forestry does not provide the staffing and oversight needed to assure implementation of the OFPA.**

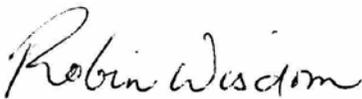
If 1.6 million acres were transferred into private industry, those acres would then be subject to the state’s regulations regarding herbicide use provided by the OFPA (OAR 629-600-0000). OFPA regulations are typically fewer and enforced less than those of the federal government.

In OAR 629-600-0000, the chemical section of the OFPA, all oversight is left to the individual chemical user and the directions on the toxin container. Aerial spraying is allowed as close as 60 feet to wetlands, fish bearing streams, aquatic areas of other lakes with fish use; or other areas of standing open water larger than one-quarter acre, but smaller streams have no buffer. For spraying groundwater there are no guidelines. Hand application of an unlimited list of toxins may occur as close as 10 feet of the same list of water bodies. (We are pleased that the Governor’s budget recommends additional focus on water quality monitoring of our forests since most water Oregonians drink originates in our forests.)

With complex topography and variable weather conditions, it is virtually impossible to prevent chemicals from drifting onto water-bodies or adjacent public lands, private agricultural lands, and rural families where the chemicals are harmful and not welcome.

There should be a plan in place to prevent massive toxification of 2.7 million lands involved in this proposal. As is, the League opposes this proposal to transfer 1.6 million acres of public lands to private land use oversight.

Sincerely,



Robin Wisdom
President