



June 20, 2022

Drew W. Stroberg
U.S. Forest Service District Ranger
Klamath National Forest
Goosenest Ranger District
37805 Highway 97
Macdoel, CA 96058

Sent electronically

**Re: Comments on the Antelope and Tennant Fire Recovery Project in Preparation
for the Environmental Assessment**

Dear Mr. Stroberg,

Save California Salmon appreciates the opportunity to comment on the U.S. Forest Service's Antelope and Tennant Fire Recovery Proposal in preparation for development of an Environmental Assessment (EA).

Firstly, we would like to express gratitude to the Forest Service for removing the use of herbicides from the project. Originally there were concerns over the herbicide use that were included in the proposed "Site Preparation for Reforestation: Competing Vegetation Control." The suggested chemical herbicide use in forest management is unacceptable to the communities of the Klamath, specifically the tribal communities, and we are grateful for the opportunity to submit comments with our tribal partners and participate in the pre-scoping for the project.

Despite what other commenters may believe, the use of herbicides is not necessary for effective reforestation. Herbicides have been absent from the KNF for many years and the forest has been thriving. To introduce herbicides into this environment in which herbicides have been absent would cause significant damage to the ecosystem. The Indigenous people of the land managed forests for centuries without the use of herbicides and the U.S. Forest Service has the resources to manage forests in the same way now.

Other commenters seemed to ignore the negative long term impacts that the use of herbicides would have on the tribal communities. Traditional tribal harvesters have rational concerns over the potential exposure to environmental toxins when herbicides are used.¹ The danger to exposure can come through terrestrial and aquatic food resources as well as through traditional basket materials that people place in their mouths during the basketweaving process.² The scope of the effects of herbicides expands beyond its potential to kill off unwanted flora, it negatively affects the human community as well. We further addressed the proposed use of herbicides in our pre-scoping letter and we invite others to read that letter, which will be submitted with this letter, to learn more about why we opposed the use of herbicides.

Next, we appreciate all of the information that was shared at the May 15, 2022 meeting. It was helpful to see how the management methodologies were used previously in the Goosenest Study areas and how the fires burned in the various treatment areas. One thing that was noticeably absent from the presentation and the project proposal was any incorporation of Traditional Ecological Knowledge (TEK). The U.S. Forest Service 2012 Planning Rule “requires decisionmakers to use best available science and to request information about tribal [TEK], land ethics, cultural issues, and sacred and culturally significant sites.”³ Tribes of California used prescribed burns all over the state long before colonization, and when colonizers came to the state they were forced to stop their traditional forest management practices. By reaching out to tribal people and embracing TEK into the project, traditional knowledge can be used in conjunction with modern science in a way that can benefit the forest in the best way possible.

Further, we want to echo the sentiments expressed in another comment, that cultural resource surveys should be conducted before any major action is taken in order to preserve cultural resources. The fires resulted in the clearing of the land in a way that may have exposed cultural resources and possible ancestral remains that were not discoverable before. Working with tribes to ensure the protection of cultural heritage sites is a part of the 2012 Planning Rule that would be beneficial to follow in this situation.

Lastly, during the May 15 meeting, there was a reference to “repairing the water systems” and there are some questions and concerns that were raised with regards to that comment. Generally, waterways are resilient and can adapt easily if disturbed by natural forces. Does repairing the water systems mean that there will be a manmade effort to create waterways where the Forest Service wants them to be? It seems like this could cause some disturbance to the changed landscape and it may be more prudent to wait and

¹ Long, Jonathan and Frank K. Lake, Kathy Lynn, and Carson Viles, “Chapter 11: Tribal Ecocultural Resources and Engagement,” *Synthesis of Science to Inform Land Management Within the Northwest Forest Plan Area*, (2018), P. 889. https://www.fs.fed.us/pnw/pubs/pnw_gtr966_chapter11.pdf

² *Id.*

³ *Id.* at 858. *See also*, USDA FS 2012. <https://www.fs.usda.gov/detail/planningrule/home/?cid=stelprdb5359471>

see how the water systems will repair themselves before forcing them into the bounds we humans think are appropriate. This could also be a situation where consulting with tribes and using TEK per the 2012 Planning Rule may be useful to determine what is the best way to allow the water systems to thrive.

We thank you for the opportunity to comment on the Antelope and Tennant Fire Recovery Project during the pre-scoping process and again now. We appreciate your consideration of our prior comments and the action taken regarding herbicide use. We hope that these new comments will be beneficial and can help create a more inclusive process.

Thank you,

A handwritten signature in black ink, appearing to read 'Regina Chichizola', written in a cursive style.

Regina Chichizola
Executive Director
Save California Salmon