



April 19, 2022

Drew W. Stroberg
District Ranger
Forest Service
Klamath National Forest and Butte Valley National Grassland
Goosenest Ranger District

Sent electronically

**Re: Letter of Concern for Planning of Environmental Assessment for the Proposed
Antelope and Tennant Fire Recovery Project**

Dear Mr. Stroberg,

Save California Salmon is writing to express concerns for the plan to prepare an Environmental Assessment (EA) for the proposed Antelope and Tennant Fire Recovery Project. Specifically, there are concerns over the herbicide use that is 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.

Currently, the plan includes possible herbicide use on 25,111 of the 56,483 acres of land proposed to be treated. That means that about 45% of the treatment of land could be subjected to herbicide use. That amount of herbicide use is far too great especially for national forest land. While it is noted that the Butte Valley, Butte Creek, Antelope Creek, and Willow Creek watersheds are closed watersheds, it does not mean that precipitation or other environmental factors would not carry these toxins further into other

waterways. Additionally, it is not just the quality of water that is of concern, but also the amount of chemicals that would be absorbed into local plants.

California tribes in the past have expressed concerns over the effects of the method planting included in the Recovery Project in terms of chemical herbicide. There is specific concern because traditional tribal harvesters worry about the level of potential exposure to environmental toxins.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.²

In the past, California Indian Basketweavers Association collaborated with researchers to study potential exposure to several common herbicides that were being used to promote conifer growth in national forests.³ Results showed that herbicides were detectable on several plant species that are likely to be gathered by Native Americans, for months and in some cases the herbicide was detected beyond the scope of the targeted treatment areas.⁴ Two of those same herbicides are the ones that are being proposed for use in the Recovery Project – Triclopyr and Glyphosate. These herbicides can be detrimental to the culture and traditions of Native American tribes if they are no longer allowed to use their cultural resources due to chemical herbicide uses.

There has already been a fight against using herbicides in the Klamath National Forest and to reintroduce them would negatively impact the ecosystems and communities that have been thriving without the presence of the harmful chemicals. We request that the use of chemical herbicides be removed from the plan moving forward.

Thank you for your consideration,

A handwritten signature in black ink, appearing to read 'Regina Chichizola', with a stylized, cursive script.

Regina Chichizola
Executive Director
Save California Salmon

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.*

⁴ *Id.*