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April 16, 2010

Katherine Carpenter, Project Leader  
kacarpenter@fs.fed.us  
Mt. Hough Ranger District  
39696 Highway 70  
Quincy, CA 95971

Re: Keddie Ridge Hazardous Fuels Reduction Project

Dear Ms. Carpenter,

Californians for Alternatives to Toxics (CATs) is a public interest, membership-based organization that is concerned about the use of pesticides, including herbicides, on public lands and promotes alternatives to pesticide use in California. CATs shares your concern for hazardous fire conditions and forest health issues associated with tree stand overcrowding, invasive plant populations, and forest pests.

CATs has historically commented on many Forest Service fuel reduction, thinning and forest health projects because of the common use of the herbicides in these types of activities. CATs has several questions, suggestions and concerns about the Keddie Ridge Hazardous Fuels Reduction Project that the Mt. Hough Ranger District is currently developing.

One of the actions proposed in the scoping document is the construction of 5,476 acres of fuel breaks (DFPZs) ¼ mile wide. How will the undergrowth vegetation that will grow rapidly where the canopy is opened up in these heavily thinned areas be managed? CATs is concerned about forestry management tactics that lead to future use of herbicides from native brush re-growth and the spread of invasive plants through disturbance, including greater sun light reaching the forest floor.

In the purpose and need section of the Scoping document the Plumas Forest identifies "Improved watershed health" as the 4<sup>th</sup> purpose of the proposed project. The Plumas Forest states concern for water quality and sedimentation caused by roads and their use. CATs would like to point out that the use of herbicides to manage vegetation creates potential for water pollution. Creating bare earth with herbicides, such as non-selective ones like the proposed glyphosate, creates a situation where banks become destabilized or heavy rains wash dirt into streams and lakes. CATs recommends that only non-chemical vegetation treatments be used and that a native plant re-seeding and re-vegetation element be designed and implemented to prevent invasion of unwanted species.

Native basket weavers and plant material collectors are concerned about the use of herbicide in sacred sites and historic collection and foraging areas. What basketry materials are present in the project area? Are basketry materials found in areas where herbicides are planned for use? Do members of the public have permits to gather seeds and other materials in or near the project area? Will signs be posted prior and post herbicide application? The scoping document does not mention the effects of herbicide application to non-target, non-timber forest products collected by tribal members or the general public, but these are important environmental and cultural impacts that will need to be addressed in the DEIS.

The scoping proposal includes a plan to reduce noxious weed infestations. It is important that the DEIS address how the noxious weed population have been established in this section of the Plumas National Forest and how they spread. The activities proposed in this project such as road construction, thinning and clearing, and herbicide use are all well documented vectors for noxious weed establishment and proliferation. Disturbances that have led to past infestations and will lead to future noxious weed infestations must be dealt with as part of this plan. The DEIS should include an integrated weed management plan that would include limiting and reducing activities that have led to past invasions.

CATs has concerns about chemicals used on public lands and we would like to quickly point out some particular concerns about the three herbicides selected for this particular project.

Glyphosate can have harmful effects on non-target plants and native soil microorganisms. Glyphosate and the toxic surfactants it is mixed with translocate from the body of the plant into the root where it leaches into soil and affects soil organisms. This would be counter-productive for your project. What's more, bare chemically treated soil provides an opportunity for hardy non-native weeds to establish colonies and out-compete the already struggling native plant species. Surfactants and their impacts will also need to be fully analyzed in the DEIS.

Chlorsulfuron is listed on the California Safe Drinking Water and Toxic Enforcement Act of 1984 (Prop 65) as a known female and male developmental toxin. Chlorsulfuron is also listed on the California Department of Pesticide Regulation Groundwater Protection List for its known potential to pollute ground water. This herbicide seems a particularly risky choice for our public lands and especially a project that aims to "improve watershed health".

Aminopyralid is a recently registered herbicide that is getting media coverage for its long lasting toxic effects. It is extremely persistent and when ingested by grazing mammals it passes through the system unchanged and maintains its toxicity. This chemical raises great concern for CATs and its members because of the potential to effect foraging wildlife and non-target plants after excretion.

Herbicides are not an appropriate choice of treatment for Canada thistle or Scotch broom. Both populations are relatively small and have recorded marginal success with chemical treatments alone. Chemical treatments for both of these invasive plants require follow-up

leading to compounding toxins impacting soil, water and non-target species. The number of proposed treatments, timing and quantity of herbicide proposed will need to be explicitly detailed in the DEIS for the project to be transparent and the most appropriate decision to be made.

Finally, we ask that you incorporate a post-project re-vegetation monitoring plan with data available to the public as other Ranger Districts in Plumas National Forest have done now for several years.

We ask you to consider the long-term costs of herbicide applications, particularly those to the environment, the natural area, and the people who live near and use the Plumas National Forest.

We look forward to reviewing further materials and the DEIR for this project.

Sincerely,

Vanessa M. Vasquez,  
Programs and Policy Associate