▲ CALIFORNIA INDIAN BASKETWEAVERS ASSOCIATION ▲

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USDA Forest Service
Content Analysis Enterprise Team
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RE: United Federal Policy for Ensuring a Watershed Approach to Federal Land and Resource Management; Notice of Proposed Policy and Request for Public Comment

Dear USFS Analysis Team Members:

The California Indian Basketweavers Association works to perpetuate California Indian basketweaving traditions. In addition to our cultural and educational programs, we seek to ensure that Indian basketweavers have safe access to gathering areas, and we strive to protect these areas in perpetuity. We also work to encourage management practices that enhance and conserve native cultural and subsistence resources.

We are pleased that the US Department of Agriculture and the Department of the Interior are taking an active role in ensuring that the watersheds originating in the forests and mountains of our nation that supply most of the nation's drinking waters are protected to the greatest extent possible. These same waters that were once safe to drink now must be filtered and chlorinated in many areas in order to be safe for humans to drink. And many fish, frogs, mollusks and other related aquatic organisms today face extinction due to the pollution, sedimentation, and other by-products of agriculture, development, logging, and mining that occur in these watersheds.

We hope that the changes to watershed management on federal lands proposed in this notice will help to restore the salmon, steelhead, and other fish species that are such an integral part of tribal culture and subsistence. We hope also that these proposed changes will reduce the sources of herbicides and other non-point sources of toxic chemicals that are cumulatively degrading the quality of water coming from these watersheds.

Indian basketweavers use many plant materials from National Forests and BLM lands for basketweaving. There is a long history of exposure to toxic pesticides in the forest environments in which many Indians gather, live, and work. Basketweavers face risks of exposure while traveling to and from gathering areas. Plant materials are handled repeatedly in the process of

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tending, gathering, preparation, and weaving; many are held in the mouth while processing. These multiple pathways of exposure over long periods of time that put basketweavers at greater risk than the average forest user. We have been working since 1991 to educate public land managers about these threats, and have encouraged the US Forest Service, USA EPA, and the California Department of Pesticide Regulation to conduct studies. Preliminary results of a study being carried out in the Sierra Nevada indicate that herbicide residues on basketry plants and other species of plants contained residues as much as 80 weeks after spraying.

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The use of herbicides on National Forest system lands has increased here in California in the last decade. Last year, in 1999, almost 36,000 pounds of (active ingredient) herbicides were used on California (Region 5) National Forests. This figure doesn't include the so-called inert substances, additives that may be more toxic than the active ingredients themselves (this is the case with Round-up, the Monsanto brand of the herbicide containing glyphosate. The surfactant in Round-up is a known carcinogen, and is toxic to amphibians and other riparian and aquatic wildlife). Combined with the effects of herbicide use on private lands, and on agricultural lands in the state, we believe this is a significant source of non-point pollution, which should be eliminated. We also believe that using herbicides on National Forest or BLM lands is a form of industrial forestry that is not in keeping with the stewardship, ecological, and science-based emphasis that is the current direction for FS and BLM management.

In March 1999, the herbicide hexazinone was accidentally applied by helicopter into Rose Creek, on the Stanislaus National Forest, in an accident that resulted in the Regional Forester temporarily suspending the aerial application of hexazinone. Hexazinone is a toxic herbicide that is not registered for use in aquatic or riparian ecosystems; according to the EPA, it is toxic to all forms of aquatic and riparian vegetation, and is corrosive to eye tissue; it also is long-lasting or persistent in water and very mobile in soil. In 1996, Sierra Pacific Industries (SPI), the second largest private land owner in the United States, was prosecuted in Trinity County for applying hexazinone that leached into a neighbor's property, contaminating their ponds. After fourteen months, the hexazinone was still found in the water.

After clearcutting a forested area, trees are planted like row crops. In order to hasten their growth, herbicides like 2,4-D, hexazinone, picloram, triclopyr, dicamba, and glyphosate are used to kill the native shrubs and trees that also grow in the plantations--treated as if they were weeds. Because of the checker-board (public/private) ownership pattern of the forests in Northern California, the streams that pass through public lands and timber industry lands alike, are subjected to a potentially large amount of pesticide run-off that is unmonitored and is not accounted for as non-point pollution sources in streams and rivers. Many of these chemicals are highly toxic to aquatic organisms, including keystone algae and invertebrate species. They kill native vegetation long after they have been applied.

In addition, many public land management agencies recently have begun to use poisonous herbicides to control so-called "noxious" weeds, plants that are not indigenous to this continent and which interfere with activities such as livestock grazing, or are otherwise a nuisance. However, the cumulative effects of greatly increasing the use of herbicides for noxious weed control has not been analyzed on regional or landscape scale, and as a significant new source of cumulative or non-point source pollution, and their potential to harm basketweavers and gatherers, subsistence gatherers, wildlife, and pollute streams and rivers.

Use of pesticides to manage tree growth or to kill weeds in the forest is questionable on many ecological fronts. There is considerable evidence to suggest that the use of these chemicals and the land uses that bring about their need is damaging forest ecosystems and human health. The history of the use of

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herbicides in the vicinity of Indian tribal communities in California is shocking. Evidence for increased cancer prevalence, miscarriage, and other unusual clusters of adverse health affects in the 1980's among Indian tribes where aerial applications of herbicides were directly applied across streams, homesites, and the forest environment, was one of the precipitating factors in the formation of CIBA.

We recommend that pesticide use issues will be addressed in the final policy and that the policy call for the development of "total maximum daily load" (TMDL) levels for pesticides, as well as monitoring for compliance. Forests are--or should be-- natural ecosystems, not farms. We do not believe that pesticides belong in the forest environment. They must be replaced with sustainable alternatives that will help to ensure the health and viability of biologically diverse forest ecosystems, and safe drinking water for the generations to come.

We also expect that local tribes will be included in coordinating development of watershed protection plans, identifying priority watersheds, developing TMDLs, and monitoring of compliance and water quality. We recommend face-to-face communication as the best avenue for contacting tribal members in order to ensure their participation in this process. Public meetings should be held in Indian communities to fully inform the members of the need for their full participation in this process, as the original stewards of the land and the water.

Thank you for your consideration.

Sincerely,

Steve Nicola

Steve Nicola
Acting Executive Director

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