November 1, 2022

Members, Wildlife Conservation Board

c/o John Donnelly, Executive Director

P.O. Box 944209

Sacramento, CA 94244-2090

Dear Honorable Wildlife Conservation Board Members,

The Siskiyou County Board of Supervisors is writing you regarding the use of herbicides in habitat restoration projects in California. We greatly appreciate the Wildlife Conservation Board’s (WCB) long history of supporting habitat restoration projects and we encourage the WCB to continue enabling ambitious projects that protect and enhance habitats, ecosystems, wildlands and agricultural lands including revegetation and reforestation of land decimated and destroyed by wildfire.

Careful consideration of herbicide use is important because invasive species pose “the most pervasive pressure on California ecosystem” according to the California State Wildlife Action Plan.[[1]](#footnote-1) In fact, the problem of invasive species is “a main direct driver of biodiversity loss across the globe” according to the U.N. Convention on Biodiversity.[[2]](#footnote-2) California’s “Pathways to 30 by 30” document consistently identifies invasive species as a challenge to achieving the state’s conservation goals.[[3]](#footnote-3)

Therefore, it is not surprising that removal of invasive plants is often an integral part of successful habitat restoration and protection. Land managers implement an Integrated Pest Management (IPM) approach that includes the careful and appropriate use of herbicides where needed. Because many invasive plants are difficult to remove without the use of herbicide targeted applications. These applications can mean the difference between successful or failed invasive noxious weed control efforts, including rapid response to an emerging problem.

The Siskiyou County Department of Agriculture, Vegetation Management Division works with many private landowners, governmental agencies and nonprofit groups to treat and manage Invasive Noxious Weeds, California State Rated Species (under California Food and Agriculture Code) throughout the county. These species are landscape-changing plants. In many situations, they prohibit healthy habitats and crops nullifying restoration and protection efforts without the use of all the IPM tools available, including herbicides.

Our departments take the responsibility of using herbicides very seriously. All herbicide applications are regulated by the US Environmental Protection Agency (EPA) and California EPA and are overseen by state-licensed applicators (the requirements to obtain and maintain a license is very rigorous and extensive). Herbicide use in land protection and restoration is targeted specifically to the invasive plant. Land managers consistently look for opportunities to use methods to control invasive plants that minimize harm to wildlife, people and the environment and maximize ecological benefits. Ignoring or allowing invasive plant populations to grow unchecked because a tool that could be used is arbitrarily withheld is a catastrophic detriment to land/habitat protection and restoration.

Much of the land protection and restoration projects protect/release native and desirable plants and healthy ecosystem functions on lands that are highly disturbed with diverse uses. Lands dominated by invasive plant species require a targeted application of herbicides in a project area. This encourages landscapes dominated by native and desirable plants that significantly reduce herbicide use in the area over time, as well as providing other ecological and community benefits.

The Yurok Tribe recognized this need to utilize herbicides as a tool in IPM strategy. In 2021 the Yurok Tribe conducted hand and weed eater (mechanical) treatment of several acres (104.6 acres) of invasive plant infested lands along riparian areas. It was determined that the treatment was ineffective. In early spring 2022 the Yurok Tribe started herbicide treatments of 284.3 acres along riparian areas to control invasive weeds for future restoration efforts (published document outlining herbicide treatment details “2022 Revegetation IEV Work Plan FINAL. Klamath Restoration Project. RES-YUROK TRIBE”).

California needs to be ramping up – not slowing down—its invasive noxious weed eradication efforts. California’s natural environment is in crisis, much due to fire devastation and invasion of invasive noxious weeds that has resulted greatly from mismanagement and no management of Federal and State governmentally owned lands. According to the California Natural Resource Agency’s Pathways to 30x30 report, success will require all tools available to restore, enhance, and protect habitats, including the efficient controlling of invasive plants. We urge you to recognize that an IPM toolbox that includes the judicious use of herbicides is the right approach to conserving California’s biodiversity and ensuring future generations can use and enjoy California’s natural landscapes.

Thank you for your consideration of our comments and for the WCB’s continuing involvement in habitat restoration throughout California.

This letter was approved by the Siskiyou County Board of Supervisors on November 1, 2022 by the following vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

Sincerely,

Brandon A. Criss, Chair

Board of Supervisors

Suggested reading: Publications that give an IPM balanced approach to invasive noxious weed treatment.

Example: “Weed Control of Natural Areas in the Western United States”, Weed Research & Information Center, University of California.

1. California State Wildlife Action Plan (2015), at pp. 1-11. [↑](#footnote-ref-1)
2. For more, please see United Nations Convention on Biodiversity statement available at <https://www.cbd.int/invasive/> [↑](#footnote-ref-2)
3. *See*, *e.g.*, California Natural Resources Agency. 2022. Pathways to 30 by 30. Pp. 12, 16, 49, 52, available at <https://www.californianature.ca.gov/pages/30x30> [↑](#footnote-ref-3)