

GOVERNMENT

OFFICES

1

NE STEPHENS

TREET

SUITE 1 0 0

ROSEBURG

REGON

(341) 672-9405

FAX NUMBER

FEA 12

August 31, 2006

James Hubbard Deputy Chief, State and Private Forestry USFS Fire Retardant EA c/o The Content Analysis Group PO Box 2000 Bountiful, UT 84011-2000

NOTE: This document is confidential: Releasing information about the nature and the location of archaeological and historical resources is restricted under Section 304 of the National Historic Preservation Act, as amended (16 U.S.C. 470w-3) and Section 9 of the Archeological Resources Protection Act (16 U.S.C. 470hh; 36CFR296.18).

Dear Mr. Hubbard,

Thank you for your scoping letter dated July 25, 2006 regarding the United States Forest Service (USFS) proposed action to continue nationwide aerial application of fire retardant to flight fires. I have several concerns that I would like the USFS to consider in the Environmental Assessment.

The Cow Creek Band of Umpqua Tribe of Indians (Tribe), as I'm sure many other Tribes across the nation, has traditional cultural areas on USFS lands. You may be familiar with the recently designated Huckleberry Patch Special Interest Area designated on the Umpqua and Rouge National Forests in Oregon. This area is used by Tribal members as a gathering place and for harvesting huckleberries and other traditional cultural plants. Spraying of these areas might be a hazard to the health of Tribal members, as well as others whom are harvesting huckleberries and timing of harvest and harvest areas should be considered in the planning process of aerial fire retardant.

The Tribe also considers fire as a natural occurrence in Southern Oregon and uses fire as a management tool on Tribal lands and in traditional use areas prior to western influence. We are not advocating the non-use of aerial fire retardant, but would ask that the USFS consider that some areas need to be burned, if occurring naturally. Fire promotes better growth for huckleberries and we are currently working with the Umpqua and Rogue National Forests to draft a management plan for the Special Interest Area that incorporates fire as a management tool for this area.

Please take these concerns and address them as potential affects to cultural resources on USFS lands.

Sincerely,

Amy Amoroso

Director of Natural Resources

CC: Debra Barner, Umpqua National Forest

 $\hat{\mathcal{L}}$