UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

FEB 22 2010

Ms. Emelia H. Barnum
Mount Shasta Ranger Station
204 W. Alma Street
Mt. Shasta, CA 96067

Subject: Final Supplemental Environmental Impact Statement for the Pilgrim Vegetation Management Project, Shasta-McCloud Management Unit, Shasta-Trinity National Forest, Siskiyou County, California (CEQ # 20100012)

Dear Ms. Barnum:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

EPA submitted comments to the U.S. Forest Service (Forest Service) on the Draft Environmental Impact Statement (DEIS) for this project on August 3, 2006. Unfortunately, our comments were not received by the Forest Service by the August 7, 2006 comment due date. Consequently, EPA's comments were not addressed in the "*Response to Comments*" in the Final Environmental Impact Statement (FEIS). EPA submitted comments on the FEIS on August 6, 2007. In that letter, EPA reiterated issues identified in our DEIS comment letter and offered recommendations for the Record of Decision (ROD). We expressed concerns with inadvertent exposure of humans and non-target species to the fungicide Sporax, potential adverse effects to snag-dependent and late-successional species, and road-related resource impacts. Our comments on the FEIS were not addressed nor were our recommendations incorporated into the ROD. In response to a court ruling[1] that identified specific issues requiring additional analysis and supplemental information, the Forest Service prepared a Draft Supplemental Environmental Impact Statement (DSEIS). We reiterated our concerns in our comments on the DSEIS on April 28, 2009. We appreciate the response to our comments regarding adverse effects to snag-dependent and late-successional forest species and road-related resources in the Final Supplemental EIS (FSEIS).

EPA supports the Forest Service's effort to address unhealthy timber stands and reduce high fuel loads; however, we remain concerned with potential human and environmental exposure associated with the application of Sporax, and cumulative effects to snag-dependent and late-successional forest species. We recommend that the Forest Service implement measures to minimize the exposure of humans and non-target species to Sporax, such as a notification and signage program to inform Forest users and local communities of Sporax application sites and

[1] Conservation Congress and Klamath Forest Alliance v. United States Forest Service, No. Civ. S-07-2764 LKK/KJM (United States District Court for the Eastern District of California, May 13, 2008).

the presence of treated stumps. While it may not be feasible, initially, to meet desired late-successional and snag-dependent species' canopy and tree retention requirements, we recommend that those requirements be met to the maximum extent possible, wherever, and as soon as, possible.

We appreciate the opportunity to review this FSEIS and ROD. If you have any questions, please call me at (415) 972-3521, or have your staff contact Laura Fujii at (415) 972-3852 or fujii.laura@epa.gov

Sincerely,

Kathleen M. Goforth, Manager
Environmental Review Office

cc: J. Sharon Heywood, Forest Supervisor, Shasta-Trinity National Forest