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

August 6, 2007

Mike Hupp
District Ranger
Shasta-McCloud Management Unit
204 W. Alma Street
Mt. Shasta, CA 96067

Subject: Final Environmental Impact Statement for Pilgrim Vegetation Management Project, Shasta-McCloud Management Unit, Shasta-Trinity National Forest, Siskiyou County, California (CEQ # 20070265)

Dear Mr. Hupp:

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

EPA submitted comments on the Draft Environmental Impact Statement (DEIS) to the Forest Service on August 3, 2006 via U.S. mail. 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 FEIS. This letter reiterates issues raised by EPA in our DEIS comment letter and makes specific recommendations for the Record of Decision (ROD).

EPA supports the Forest Service and its effort to address unhealthy timber stands and to reduce high fuel loads. However, we are concerned with the possibility of inadvertent exposure to humans and non-target species to Sporax, potential adverse effects to snag-dependent and late-successional species, and road-related resource impacts. For the ROD we recommend: 1) Minimizing Sporax exposure to human and non-target species, 2) avoidance and minimization of adverse cumulative effects to snag-dependent and late-successional forest species, and 3) addressing identified road-related sedimentation and erosion problems by utilizing road management actions. Our Detailed Comments are enclosed.

We appreciate the opportunity to review this FEIS and request a copy of the ROD when it becomes available. If you have questions, please contact me at 415-972-3846, or Laura Fujii, the lead reviewer for this project. Laura can be reached at 415-972-3852 or fujii.laura@epa.gov.

Sincerely,

Nova Blazej, Manager
Environmental Review Office
Communities and Ecosystems Division

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Enclosure: Detailed Comments

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

EPA DETAILED COMMENTS ON THE FINAL ENVIRONMENTAL IMPACT STATEMENT FOR PILGRIM VEGETATION MANAGEMENT PROJECT, SISKIYOU COUNTY, CA, AUGUST 6, 2007

Detailed Comments

Minimize exposure of humans and non-target species to Sporax. In the FEIS, page 17 states that to control the spread of annosum root disease, Sporax, a fungicide, will be applied to all large stumps 14" and larger within four hours of being cut. Applications would follow all federal and state rules and regulations; including worker protection, spill prevention and remediation, and storage requirements. The FEIS indicates there are potential risks to humans and the environment from the application of Sporax. For example, Sporax is highly toxic to the eye and absorbed through abraded skin (p. 41). In addition, direct consumption from a tree stump by a child could result in a non-lethal but toxic effect such as vomiting and diarrhea (Appendix J: Borax Report for Pilgrim Project, p. J-11). There may also be ecological risk to non-target fungi, insects, and amphibians (Appendix J, J-13). On page 108 in the FEIS, it is noted that the project area contains the Pilgrim Creek Snowmobile Park and is used by the public for deer hunting, mushroom gathering, firewood cutting, and dispersed camping.

> *Recommendation:*
> Due to public use in the project area, the Record of Decision (ROD) should describe measures and project commitments to notify and inform public users and local communities of Sporax application sites and the presence of treated stumps. We encourage the Forest Service to implement protective measures regarding Sporax application and should include them in Appendix E: Best Management Practices.

Avoid and minimize adverse cumulative effects to snag-dependent and late-successional forest species. The proposed action would remove diseased trees that have chlorotic foliage, ragged and fading crowns, poor needle retention and/or evidence of successful insect attacks. Due to extensive tree mortality from root disease and insects, the 15% green tree retention standard for snag-dependent species and the management goal of 60% canopy closure for late-successional forest species may not be met in stands with few healthy or live overstory pine trees (p. 19).

> *Recommendation:*
> We recommend the ROD commit to meeting the 15% green tree retention standard and 60% canopy closure goal, if sufficient healthy trees are available within the treatment stands. While it may not be feasible to meet the abovementioned standards for the entire area, we recommend attempting to meet them to the maximum extent.

Utilize the road management actions to address identified road-related sedimentation and erosion problems. The FEIS states that local road maintenance needs and related issues will be addressed for roads affected by this project (p. 102). However, the FEIS does not appear to describe measures to address recognized road-related concerns for Swamp Creek (p.95), Dry Creek, and Road 41N44Y (p. 95 and Appendix D: Road Actions, p. D-1).

Recommendation:
We encourage the Forest Service to include road improvements in the project design to address identified resource problems. The ROD should include a list of road-related sedimentation, erosion, and water quality impacts within the project area and describe how project actions, such as the proposal to close 9 miles and decommission 2.1 miles of roads in the project area (pps. 23, 100) will address these problems. Once these impacts have been identified and addressed, we recommend the ROD commit to rapid implementation of these road improvements. The ROD should also commit to minimizing erosion caused by road construction and road decommissioning by planting native species which can help minimize erosion.