



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

August 3, 2006

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

Subject: Draft Environmental Impact Statement for Pilgrim Vegetation  
Management Project, Shasta-McCloud Management Unit, Shasta-Trinity  
National Forest, Siskiyou County, California (CEQ # 20060256)

Dear Mr. Hupp:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced Draft Environmental Impact Statement (DEIS) 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.

Based on our review, we have rated the proposed vegetation management project as Environmental Concerns – Insufficient Information (EC-2). A *Summary of EPA Rating Definitions* is enclosed. While EPA supports the effort to address unhealthy timber stands and reduce high fuel loads, we have concerns with the potential for unintentional exposure of humans and non-target species to Borax and potential adverse effects to snag-dependent and late-successional species. We recommend road management actions be used to address identified road-related sedimentation and erosion problems. Our Detailed Comments are enclosed.

EPA appreciates the opportunity to review this DEIS. We are available to discuss our Detailed Comments. When the Final EIS is released for public review, please send one copy to the address above (mail code: CED-2). If you have questions, please contact me at 415-972-3988, or Laura Fujii, the lead reviewer for this project. Laura can be reached at 415-972-3852 or [fujii.laura@epa.gov](mailto:fujii.laura@epa.gov).

Sincerely,  
/s/

Duane James, Manager  
Environmental Review Office  
Communities and Ecosystems Division

Enclosures:

Summary of EPA Rating Definitions

Detailed Comments

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

### **Detailed Comments**

***Minimize exposure of humans and non-target species to borax.*** To control the spread of annosum root disease, borax will be applied to all large stumps within four hours of being cut (p. 15). Applications would follow all federal and state rules and regulations; including worker protection, spill prevention and remediation, and storage requirements. The DEIS indicates there are potential risks to humans and the environment from the application of borax. For instance, borax is highly toxic to the eye and absorbed through abraded skin (p. 39). In addition, direct consumption from a tree stump by a child could result in a non-lethal but toxic effect (vomiting and diarrhea) (Appendix J: Borax Report for Pilgrim Project, p. 253). There may also be ecological risk to non-target fungi, insects, and amphibians (Appendix J, p. 255). We note 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 (p. 97).

***Recommendation:***

Given the use of the project area by the public, the FEIS should describe measures and project commitments to notify and inform local communities and public users of borax application sites and the presence of treated stumps. Protective measures that will be implemented should be included 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 will not be met in stands with few healthy or live overstory pine trees (p. 17).

***Recommendation:***

Although it may not be possible to meet the above standards across the entire project area, we recommend striving to meet them to the maximum extent feasible. We recommend the FEIS and Record of Decision direct that the 15% green tree retention standard and 60% canopy closure goal be met if sufficient healthy trees are available within the treatment stands.

***Utilize the road management actions to address identified road-related sedimentation and erosion problems.*** The DEIS states that local road maintenance needs and related issues will be addressed for roads affected by this project (p. 91). However, the DEIS does not appear to describe measures to address identified road-related concerns for Swamp Creek (p. 84), Dry Creek, and Road 41N44Y (p. 84 and Appendix D: Road Actions, p. 143).

*Recommendation:*

The FEIS should include a list of road-related sedimentation, erosion, and water quality impacts within the project area. The Hydrology Section should also be expanded to describe and evaluate these road-related issues. Evaluate whether these impacts will or can be addressed by the project actions, such as the proposal to close 9 miles and decommission 2.1 miles of roads in the project area (pps. 18, 89). We encourage the Forest Service to include road improvements in the project design to address identified resource problems.