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November 2, 2009

Sandy Mack
TEAMS USFS Enterprise Unit
1801 N. First
Hamilton, MT
Fax: 406-375-2638

Re: Scoping for Rattlesnake Fuel Reduction and Forest Health

Dear Sandy,

Californians for Alternatives to Toxics (CATs) is a public interest, non-profit organization that is concerned about the use of pesticides and promotes alternatives to pesticide use in California. CATs is also concerned about activities that create conditions in which the use of pesticides is likely. Many CATs members live in and around the vicinity of Hayfork, CA and the South Fork Management Unit in the Shasta-Trinity National Forest.

CATs shares your concern for hazardous fire conditions and forest health issues. We commend the Shasta-Trinity National Forest (the Forest) for its general preference of manual and least-toxic vegetation management and for its collaboration with local communities.

CATs has historically commented on many Forest Service fuel reduction, thinning and forest health projects due to the common use of the pesticide borate in these types of activities as well as other herbicide treatments for invasive plant species.

After reading the initial scoping letter, CATs believes that this project is significant and has the potential to cause invasive plant infestations, proliferation of native understory brush and lead to herbicide use for vegetation management. In the Proposed Action for Rattlesnake Fuel Reduction and Forest Health project (Rattlesnake project) the Forest plans to reduce tree density, thin understory, create fuel-breaks and reduce encroachment of white fir on pine species creating an expected 33 million board feet of merchantable timber from these treatments. The total project will treat a large area: 6,028 acres. New temporary roads are also proposed in this project totaling 6.7 miles and 81 new landings. With large-scale activities such as these, it is necessary that the plan developed address the future vegetation management needs created by these actions.

CATs and its diverse member-base are concerned about fuel reduction projects since opening up the forest canopy and clearing underbrush can lead to invasive and/or undesirable plant introduction, infestation and re-growth. It is well known that noxious weeds pose a significant threat to the native ecology of our National Forests. CATs is concerned about ground disturbing projects, such as the Rattlesnake project, that have a high potential to lead to further noxious weed dispersal. Heavy machinery needed to commercially cut timber, clear ½ acre landings, cut fuel breaks and create new roads presents a significant level of disturbance. How does the Forest plan on managing existing noxious weeds within the disturbed project area and avoid further spread to newly cleared roads, breaks and landings?

The Forest Service has a long history of relying on herbicides to manage native brush that grows back excessively following timber extractions and road building. How will native brush be managed as a result of the project in the decades ahead?

CATs is concerned that the proposed activities will lead to the use of chemical vegetation management methods once the cleared and thinned areas began to regenerate. The Scoping document completely fails to address invasive plant management and native brush re-growth but it is imperative that the future vegetation management needs created by this project are thoroughly addressed and analyzed.

While the Scoping document did not mention the use of any pesticides, based on historical use, CATs is concerned that the Rattlesnake project would include the use of borate (commercially known as Sporax). Borate is frequently used in both forest thinning and timber harvesting and is applied to cut stumps as a fungicide to combat the spread of annosus root rot. Does the Forest plan on using borate or another chemical in this project? Borate is a registered pesticide in the State of California. It is not naturally occurring in the Shasta-Trinity National Forest. Since it is a non-selective herbicide, insecticide and fungicide and falls under pesticide regulation, the Forest must disclose any potential for its use, including detailed analysis and alternatives to its use. The Forest Service must evaluate the methods and type of pesticides that are planned for use and include it in public documentation for this project.

Sincerely,

Vanessa M. Vasquez,
Programs and Policy Associate

Patricia M. Clary
Executive Director