



MOUNT SHASTA BIOREGIONAL ECOLOGY CENTER

SAVE MOUNT SHASTA • SAVE MEDICINE LAKE HIGHLANDS • HONOR OUR MOUNTAIN ENVIRONMENT
P. O. Box 1143 • Mount Shasta, CA 96067 • Phone & Fax 530.926.5655 •

Jan 30, 2018

Carolyn O. Napper
ATTN: Emelia Barnum
Shasta-McCloud Management Unit
204 West Alma Street
Mount Shasta, CA 96067

RE: McBride Plantation Scoping Comments

Ms. Carolyn O. Napper,

Thank you for considering these comments made on behalf of the Mount Shasta Bioregional Ecology Center (hereafter The Ecology Center). Please make sure that we are included on the mailing list to receive forthcoming decision documents and NEPA analyses.

The Ecology Center supports the efforts outlined in this project aimed at reducing hazardous fuel loading near at-risk communities, restoring forest in areas of recreational and community value, and the desire for collaboration in development and project implementation. We echo the comments submitted on behalf of KS Wild, EPIC, and KFA regarding the creation of and opening of “temporary roads” and the construction of dozer lines in areas that are already extensively networked. We also support their comments on the impact of machine piling and mastication on soil impaction and its effects on ecosystem process within the area, including overall productivity of plantations in question.

In addition, we would like to offer strong support for the safeguarding, as was stated in the scoping meeting on Jan 18, 2018, of minor, less represented tree species and plant assemblages within the project area.

We would like to reiterate previous comments submitted on behalf of The Ecology Center related to the use of borate-based fungicides (Sporax, Cellu-Treat, and others). Boron (as sodium borate and boric acid) is naturally present in the environment and, in normal levels, is known to play a positive role in plant growth, and has also been used medically as an anti-microbial and anti-proliferative agent. However, we caution the use of excessive amounts of borate-based fungicides (Durkin 2014) as chronic and sub-chronic exposure to high levels of boron has been linked to reproductive issues in mammals (including humans). Since the likely vector for the general public would be via drinking water, we request the monitoring of pre- and post- treatment levels of boron in water samples taken in water courses adjacent to and downslope of treated areas. We do not anticipate that boron levels will reach levels that would be of concern to the public but feel that it is necessary given the challenges our water supply has experienced with drought and lack of snowpack.

We would also like to express concern at the use of a designation by description (DxD) as the designation method for timber removal. DxD (as opposed to timber marking) puts individual cut/no cut decisions into the hands of timber contractors who may or may not make choices in line with the ecological objectives that have been outlined in the NOP despite careful description and monitoring. We encourage the adoption of timber marking as the designation method used to identify the trees to leave and those to take. This would leave little to no room for contractor misinterpretation.

Thank you.

Sincerely,

Dr. Arielle Halpern
Senior Program Director
Mount Shasta Bioregional Ecology Center
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(530) 926-5655

Durkin (2014) Sporax and Cellu-Treat (Select Borate Salts) Human Health and Ecological Risk Assessment, (SERA TR-056-15-03c), Syracuse Environmental Research Associates, USDA Forest Service Contract Number: AG-3187-C-12-0009