FEA 4

From: Ron.Raley@icl-pplp.com
Sent: Wednesday, August 23, 2006 12:09 PM
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Subject: NEPA Scoping Comments

NEPA
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Please find attached our "Scoping" Comments to the Environmental Assessment for Aerial Application of Fire Retardant. A hard copy of these comments is also being overnight mailed to the Content Analysis Group in Utah.

(See attached file: NEPA Letter8_22_2006.doc)

Ron

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August 22, 2006

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C/O Content Analysis Group
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Bountiful, Utah 84011-2000

Dear Sirs,

We would like to thank you for the opportunity to provide "Scoping " comments associated with the Forest Service NEPA process addressing the Aerial Application of Retardants. Please consider the following comments in your analysis:

- Existing data and information is more than sufficient to make effects analysis and management decisions. Further studies are not necessary. Existing Risk Assessments should be updated with any current data that is available. Only agency data and government-funded studies should be considered in this decision-making process. This eliminates the possibility of "built-in" bias by special interest groups and industry.

- The analysis should compare the environmental effects and human risks associated with the aerial application of retardant, unchecked wildland fire and other wildland fire suppression techniques. This should be a "trade-off" analysis that clearly displays both the short and long-term effects of each action. As an example, contemporary fire retardant formulations applied to the landscape result in minimal short and long-term effects when compared with either the effects of the fire itself or alternative mechanical activities used in fire suppression action.

  Only water may have less environmental effect, however, it is usually logistically impossible to supply the volume of water per unit time necessary to replace retardant. In some cases, the application of water containing undesirable contaminants can have detrimental effects on the environment. An example of such an agent is *Phytophthora lateralis which results in Port Orford Cedar Root Rot.* This is a water-transported fungi that results in the mortality of Port Orford Cedar. Also, both handlines and dozerlines can have

long-term effects. Minimum Impact Suppression Tactics (MIST) or other "Light Hand on the Land" objectives are often better met with the use of fire retardants.

- Each Forest Service Unit (Forest or Grassland) is required to have a Land Management Plan that provides broad direction regarding wildland fire. Each Unit is also required to have a Fire Management Plan (or Fire Management Operating Plan) also. These plans outline processes in which the Unit can either allow fire to play its natural role or suppress fire through appropriate suppression responses. The processes outlined in these plans adequately protect the environment. We also believe that there are elements of the vocal environmental community that go far beyond reasonable guidelines. It is our belief that these groups simply want all wildland fire to be a natural component of the ecosystem, failing to acknowledge the growth of the urban interface/intermix, the current status of the unhealthy forest fuel profiles, endangered species, human health risks, archaeological resources and other values at risk.

  The versatility of fire retardants allows them to be effective in Wildland Fire Use, Prescribed Fire and Fire Suppression applications. Most Forests have areas in which the adverse effects of fire are of concern. Prescribed Fire Plans and Wildfire Use Plans describe the limits of adverse fire effects in these areas. Retardant can be used at low coverage levels, which has the effect of reducing rates of spread and flame lengths resulting in acceptable fire effects as specified in these Plans.

  All Forests have "Dispatch Plans" that specify appropriate initial attack actions based on current weather, time in fire season, and fuel models. Each plan displays the pre-planned "dispatch levels" that correspond with a fire behavior predictive model. Fire Retardant is not prescribed on all initial attacks, but is indicated at the higher dispatch levels. We believe the NEPA document should recognize these efforts of the Forest Service to utilize retardant only when indicated by the prevailing fire potential. These actions demonstrate a cost-efficient approach to retardant application.

  The Wildland Fire Situation Analysis (WFSA) is another analytical tool that Line Officers possess to select the appropriate strategy for wildfires that have escaped initial attack efforts. We believe the WFSA document also provides sufficient direction to the Incident Commander regarding the use, or non-use, of retardant in areas on the fire.

- The NEPA document should thoroughly address **safety** issues. Fire retardants allow suppression action to take place without deploying fireline personnel in extremely hazardous conditions e.g., rock screes, bluffs, steep topography, unstable slopes and areas with dangerous snags, etc. While the most efficient use of retardant combines fire personnel and product, in some cases it may become too hazardous to deploy ground resources. Retardants provide the fire

manager with a tool that allows him/her to take appropriate action under these circumstances without exposing personnel to these extreme hazards.

- The "Healthy Forest Restoration Act" recognizes the need to treat and restore Forests that have gone far beyond their "natural range of variability" with regards to fuel profiles. The application of fire retardants for prescribed burning and potential escaped prescribed burns will help the Forest Service achieve goals established in this Act.

  The continued and expanded use of this tool (long-term fire retardants) will be extremely important, in the future, to enable Forest Managers to meet the overwhelming, and almost impossible task of treating the millions and millions of acres of wildland vegetation as directed by the U.S. Congress, the Chief of the Forest Service, and other Agency Heads. This overwhelming challenge cannot be met by simply using natural barriers for fire use and prescribed fire programs. Mechanical methods and the use retardants to build and safely hold control lines will be necessary. In many cases the use of fire retardants will meet the MIST objectives better than mechanical methods.

  We believe that the Forest Service has been very successful in developing retardant specifications that reduce or eliminate environmental risk. This has been a continuing dynamic process resulting in the elimination of retardants and components of retardants that has improved the environmental safety of the products currently qualified and available in today's market. In view of the changes in that have occurred because of these actions, the NEPA process should limit analysis to products on the current Qualified Products List (QPL).

- Most retardant suppliers carefully select the components in their products to ensure that they pose no undue toxicological or environmental risk. The active retarding component in currently qualified Forest Service retardants contains plant nutrients that escalate restoration of the burned area. Agency-developed retardant specifications take into account potential hazards associated with individual components and agencies have taken action to restrict the inclusion of ingredients suspected to pose toxicological and environmental risk, i.e., borate sterilants, chromates, thiourea, ferrocyanide and ammonium sulfate.

  On the other hand, the most recent retardant specification mandates the use of only gum-thickened retardants that exhibit improved aerial application performance. Reduced volumes of gum thickened retardants are required to contain and control a given piece of fireline by maintaining a compact aerial retardant cloud that results in greater percentages of the applied retardant to reach the target area. This enhancement increases coverage levels, which economizes the use of retardant, while minimizing evaporation and drift.

- One issue sited by the environmental community is the large volumes of retardants applied across the United States on wildfires. Most retardants solutions contain approximately 90% water. Consequently, considering the impact of retardants based on volumes of solution applied may be misleading.

Also, fire incidence and subsequent retardant usage is cyclical, varying greatly from year to year, i.e., average volumes used are much different than often-cited peak volumes. Further, fires occur on the same parcel of land only on a many (10 to 40) years cycle. This limits the frequency of retardant application in any given area.

In conclusion, there has been a "plethora" of studies and analysis to identify the relative risks and hazards of the use of the long-term retardants that are present on the Forest Service Qualified Products List (QPL). After exhaustive, comparative examination of the facts over the past several years, including trade-off analyses, the safe and appropriate use of fire retardants has been identified. Long-term fire retardants have proven to be a viable tool for the Fire Managers across the United States and in other countries that experience Wildland fire problems. This tool is very necessary, as part of their fire management arsenal and to help the Agencies manage all of their Fire Programs (presuppression, prevention, suppression, prescribed fire and fire use) safely and cost/effectively.

If you have any questions or need clarification regarding our comments feel free to call Eddie Goldberg 215 280 3864, Larry Vandersall 909 227 1946 or Ron Raley 916 425 6570.

Sincerely,

/s/ ***Ron Raley***
Ron Raley
Deputy Agency Liaison
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ICL Performance Products