

projectmail

FEA 7

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**From:** Heissenbuttel, Anne [aheissenbuttel@stateforesters.org]

**Sent:** Thursday, August 24, 2006 10:09 AM

**To:** fireas

**Subject:** Scoping comment on Aerial Application of Fire Retardant EA.

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TO: Content Analysis Group

Please see the attached letter from NASF President Jim Hull, responding to the USDA Forest Service request for comment on the proposed environmental assessment for aerial application of fire retardants.

Anne Heissenbuttel  
Executive Director  
National Association of State Foresters

8/25/2006

FEA 7

NATIONAL ASSOCIATION OF STATE FORESTERS  
444 North Capitol Street, NW, Suite 540, Washington, DC 20001

August 24, 2006

USFS Fire Retardant EA  
c/o The Content Analysis Group  
P.O. Box 2000  
Bountiful, UT 84011-2000

Via e-mail: [fireas@contentanalysisgroup.com](mailto:fireas@contentanalysisgroup.com)

Dear Content Analysis Group:

On behalf of the National Association of State Foresters (NASF), I am pleased to provide the following comments on the proposed USDA Forest Service environmental assessment on the aerial application of fire retardant (71 *Federal Register*, No. 145, July 28, 2006). NASF is a non-profit organization that represents the directors of the fifty state forestry agencies, eight U.S. territories, and the District of Columbia. State Foresters manage and protect state and private forests across the United States. State fire organizations have been using aerially delivered fire retardant to fight wildfires since about 1955. We obtain our retardant products through the Forest Service contract and are also a major user of Forest Service contract air tankers.

Because state forestry agencies primarily protect private forest and range lands, it is critical that we keep fires small in order to minimize their impact on private property and communities. In addition, both state and federal agencies strive to keep fires small in order to minimize the costs of fire suppression and to reduce the risk that wildfires will spread to adjacent lands. One of the ways states accomplish this is through rapid initial response to all new ignitions, and the use of aerially delivered fire retardant is a critical component of a successful response. We typically apply retardant to slow the spread of a small fire, thereby allowing ground forces the time to effectively contain it.

Retardant, which is mostly water, works in multiple ways: It cools the fire; it coats the fuels, thereby robbing the fire of oxygen; and the inorganic salts in retardant slow the rate of combustion. Water alone (or with foam added) does not provide the same benefits. In situations where an ignition is a considerable distance from available ground forces or where we are protecting homes and businesses, we have no realistic alternatives to aerially delivered retardant. Therefore, the consequences of not having retardant available in these situations could be severe. We believe that without aerially delivered retardant, we will see an increase in the number and size of large fires. On private land this could mean the unnecessary loss of homes, businesses, high value commercial timber, and other valuable private property, as well as damage to important watersheds and wildlife habitat.

Over the 50+ years that state and federal fire protection agencies have used aerially delivered fire retardant, we have continually refined our delivery procedures and USFS

FEA 7

Fire Retardent EA  
August 24, 2006  
Page 2

techniques in order to minimize potential environmental impacts. For example, current guidelines require pilots to avoid dropping retardant within 300 feet of any visible bodies of water. In our experience, we have found this guideline to be very effective in avoiding impacts to waterways. In addition, the Forest Service continually modifies the chemical composition of fire retardants as new research identifies potential risks to the environment. For example, prior to 1963, retardant contained sodium calcium borate. However, once the Forest Service determined that it was corrosive and could cause soil sterilization, the borate compound was replaced with fertilizer based compounds. Today, fire retardants are approximately 85% water, 10% fertilizer (ammonium phosphate or ammonium sulfate), and 5% additives, such as gum thickeners, coloring agents, or corrosion inhibitors. Recently, when the concern surfaced that, under certain conditions, the corrosion inhibitor sodium ferro-cyanide was toxic to aquatic species, the Forest Service discontinued its use in fire retardants.

To appropriately evaluate the risks and benefits of continued aerial application of fire retardant at a nationwide scale, the environmental assessment must address:

- the importance of aerially-delivered fire retardant to achieving successful and cost-effective wildfire protection programs, not only at the federal level, but also at the state and local levels.
- the impacts of *not* using fire retardant, given the lack of suitable and effective substitutes for its use. Such impacts must include the ecological, economic and social costs of uncontrolled wildfire.
- the effectiveness of mitigation measures now in use, including the 300-foot buffer along waterways to prevent impacts on water quality, and the chemical composition of the retardant to minimize environmental impacts on the land.

Fire retardant is a relatively benign substance for which we have no immediate substitute. Because the ecological damages from large uncontrolled wildfire can be severe, particularly to aquatic species, we strongly believe that the minimal environmental risks from aerially delivered fire retardant are far outweighed by the benefits of stopping fires when they are small.

Thank you for considering our comments.

Sincerely,

*/s/ James B. Hull*

James B. Hull  
President