



United States Department of the Interior

CALIFORNIA/NEVADA OPERATIONS OFFICE
2800 Cottage Way, Room W-2606
Sacramento, California 95825-1846



In Response Reply
To: CNO-ES

AUG 9 2006

In Reply Refer To:

Memorandum

To: USFS Fire Retardant EA, c/o The Content Analysis Group, P.O. Box 2000,
Bountiful, UT 84001-2000

From: Assistant Manager, Ecological Services, California/Nevada Operations Office
Sacramento, California *Paul Henson*

Subject: Notice of a Proposed Action to Conduct an Environmental Analysis and Prepare
an Environmental Assessment (EA) for the Aerial Application of Fire Retardant,
in Accordance with the National Environmental Policy Act of 1969 (47 U.S.C.
4321 et seq.) (ER 06/761)

The U.S. Fish and Wildlife Service (Service) has reviewed the Notice of Proposed Action (NOP) dated July 28, 2006, for the above-referenced project. The U.S. Forest Service (Forest Service) proposes to analyze at a nationwide scale the environmental effects of the continued aerial application of fire retardants. The Forest Service is taking two mitigation measures to lessen the impact of fire retardant on the environment: 1) After the 2006 fire season, the Forest Service will no longer purchase or use fire retardants that contain sodium ferrocyanide and 2) the Forest Service will prohibit the aerial application of fire retardant within 300 feet of waterways visible to pilots, with certain limited exceptions.

We offer the following comments and recommendations regarding project-associated biological impacts based on our review of the NOP and our knowledge of declining habitat types and species. We provide these comments in keeping with our agency's mission to work "with others to conserve, protect, and enhance fish, wildlife, and plants and their habitats for the continuing benefit of the American people." These comments do not necessarily reflect those of the Department of Interior.

To facilitate the evaluation of the proposed project from the standpoint of fish and wildlife protection, we request that your analysis contain the following specific information:

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1. Please clarify whether this analysis will include fire suppressant foams or not.
2. In addition to a detailed discussion of potential effects to aquatic species, please include a detailed discussion of the potential ecological and toxicological effects of fire retardant drops on the full spectrum of terrestrial species, including invertebrates, small mammals, amphibians, reptiles, and birds. Also, please include a detailed discussion of the potential effects of fire retardant drops on federally threatened, endangered, proposed, candidate and sensitive botanical resources. Studies have documented that fire retardants can act as fertilizers and stimulate plant growth; however, plant diversity can decline in areas subjected to fire retardants (Larson and Newton 1996¹). Thus, potential effects to small or isolated locations of rare plants should be addressed.

In addition, we suggest adding the following mitigation measure to help prevent potential effects to small or isolated occurrences of sensitive resources: Resource advisors will be included as part of the planning for retardant drops at the start of incidents, as much as feasible.

If you have any questions regarding these comments, please feel free to contact Darrin Thome in the California/Nevada Operations Office at (916) 414-6533.

cc:

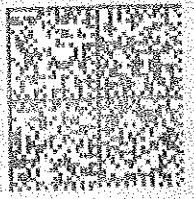
Kenneth Havran, Office of Environmental Policy and Compliance
Jim Bartel, CFWO
Darrin Thome, CNO

¹ Larson, Diane L., and Wesley E. Newton. 1996. Effects of fire retardant chemicals and fire suppressant foam on North Dakota prairie vegetation. *Proceedings of the North Dakota Academy of Science*. 50: 137-144.

Department of the Interior
U.S. Fish and Wildlife Service
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c/o The Content Analysis Group
Attn: Kenneth Havran
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