

Shashi Charles

December 12, 2006

135 Rincon Valverde

Ponderosa, NM 87044

[Stamp]

Responsible Person  
USFS Fire Retardant EA  
c/o The Content Analysis Group  
P.O. Box 2000  
Bountiful, UT 84071-2000

L-FAA-14

Greetings:

It has taken me approximately 5 months to acquire a physical surface-mail address of where to acquire USFS Fire Retardant EA. I would like to commend Ranger Mike Dechter, Santa Fe National Forest Jemez District NEPA Coordinator, for assisting me in connecting with you.

I realize the window for official non-technical written public comment may, by now, be closed. However, I ask you to honor the "living document" aspect of adaptive management publications and review my non-technical written public comment, even if it should now be off-the-record.

and Shashi Charles

December 12, 2006

to review USFS Fire Retardant EA L-PEA-14  
that I will be requesting be  
surface-mailed to me (later in the  
+ ~~end~~ part of my non-technical written  
public comment), let what follows  
stand as my present non-technical  
written public comment on USFS's  
proposal to use fire retardant pos-  
sibly containing polybrominated  
diphenyl ethers (PBDEs) to extinguish  
wild or controlled forest fires  
and/or to suffocate insects that  
kill drought-weakened trees in our  
country's national forests:

- beginning of non-technical written  
public comment -

" In 2004, the European Union,  
in practicing the Precautionary Prin-  
ciple, banned the use of penta- and  
octa-BDEs until research in Berlin  
could prove that the benefits of  
their use outweighed their risks to human  
health. In 2005, scientists at Berlin's  
Charite University Medical School  
reported that preanant female rats

(cont. from written public comment) and Shashi Charles

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health. The EU 2004 ban stands today. Before concrete research results were announced in Germany, Chemtura, an Indiana company that is the only U.S. maker of penta- and octa-BDEs, agreed to phase them out. Though the University of Surrey in England recently completed scientific assessment of the risks and benefits of flame retardants in consumer products, concluding: 'The benefits of many flame retardants do outweigh their risks to human health,' said research pertains to ppb accumulated in human blood due to exposure to PBDEs contained in foam mattresses and pillows, carpet and carpet padding, chair cushions, hair dryers, telephones, antimicrobial soaps, pet flea collars, flowers from gardens, lead paint, shower curtains, nail polish, shampoo, perfume, deodorants, lotion, hair spray, medicines, vinyl flooring, toothpaste, and plastic bath toys. This research did not pertain to ppb accumulated in human blood due to PBDEs contained in flame retardant applications on forests in close proximity

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41-057-2

Since Linda Birnbaum, an Environmental Protection Agency expert on these flame retardants, has reviewed studies by Ronald Hites, of Indiana University, that found an exponential rise of PBDE exposures in people and animals (and also found resultant levels of ppb levels in humans every 3 to 5 years) last year, the Center for Disease Control (and Prevention) is now fast-tracking a comprehensive study, lead authored by James Pirkle, of human PBDE levels in the U.S. with its results due out at the end of this year. Concurrently, the recent November 2006 election results may produce the congressional votes needed to keep alive or rebirth California State Senator Deborah Ortiz's 2005 efforts to monitor U.S. citizens' PBDE exposure. Though, disappointingly, California citizens will continue to be submitted to PBDE exposure until its statewide ban on same goes into effect in 2008, at least it is the first of 50 state bodies of legislation to take such action. The United States needs to immediately initiate laws

and Shashi Charles

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Authorization of Chemicals that requires chemical companies within its boundaries, again, in accordance with the Precautionary Principle, to prove the substances they make or use have benefits to their citizens that outweigh the health risks citizens are vulnerable to through the production or use of said substances. The United States Congress making a bill identical to the Ortiz Bill aforementioned into law would enforce chemical companies finding safer alternatives to suspect flame retardants and ban the use of stockpiles of same within our country's boundaries, including our national forests. It is imperative that such legislation be generated for 2007, superceding California's 2008 ban if applied to national forests. United States Forest Service should watchdog itself and err to caution.

In closing, until I am surface-mailed, and have reviewed and, if applicable, responded to the USFS Fire Retardant

Written public comment by [redacted] and Shashi Charles

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41-571-1

penta- or other, not be used in the United States national forests, whether by USFS, private contractors, or Department of Homeland Security agents or first-responders, in direct/indirect (as other PBDE forms eventually break down into octa- or penta- forms) application for wild, or controlled, fire extinguishment, or as a pesticide/piscicide/predator poison, permanently and immediately. Should my review of the USFS Fire Retardant EA disclose that any form of polybrominated diphenyl ethers, octa- or penta- or other, will not be used in the United States national forests, whether by USFS, private contractors, or Department of Homeland Security agents or first-responders, in direct/indirect (as other PBDE forms eventually break down into octa- or penta- forms) application for wild, or controlled, fire extinguishment, or as a pesticide/piscicide/predator poison, I will amend and resubmit this non-technical written public.

(cont. non-technical  
written public comment)

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copy retained and  
copies sent to Mike  
Dechter and Shashi Charles

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minor child and her unborn grand-  
children, living year-round, or who  
will inherit said lifestyle, in Ponderosa,  
New Mexico and adjoining the Santa  
Fe National Forest. I do not want  
to be exposed to any form of  
PBDEs drifting into our interface  
or onto firewood harvest. (This  
firewood harvest has been existant  
in this predominantly Hispanic/Native  
American community since before  
United States Forest Service existed.)

Please surface-mail immediately,  
with all due respect, hardcopy of  
USFS Fire Retardant EA c/o The  
Content Analysis Group P.O. Box 2000  
Bountiful, UT 84071-2000 to:

Rebecca G. Perry-Piper  
135 Rincon Valverde  
Ponderosa, NM 87044

Sincerely,

*Rebecca G. Perry-Piper*

Rebecca G. Perry-Piper "

— end of non-technical written public  
comment —

Rebecca G. Gent Perry - Piper  
135 Rincon Valverde  
Ponderosa, NM 87044

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