

L- FEA-15

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**From:** gyoung [pvtepadirector@adelphia.net]  
**Sent:** Tuesday, October 10, 2006 6:01 PM  
**To:** fireea  
**Subject:** Fw: USFS Fire Retardant EA

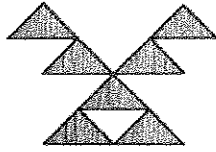
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----- Original Message -----

**From:** gyoung  
**To:** fireea@contentanalysisgroup.com  
**Cc:** youngg@adelphia.net  
**Sent:** Tuesday, October 10, 2006 4:17 PM  
**Subject:** USFS Fire Retardant EA

Attached are my comments on assessing environmental effects of the aerial application of fire retardants

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MEMO TO: The Content Analysis Group

DATE: 10-10-06

REGARDING: USFS Fire Retardant EA

The following are my comments, from the perspective of an agronomist who has worked in Northern California agriculture for over 30 years.

I think they should subject the retardant formulations to the same tests performed when registering pesticides, especially regarding invertebrate aquatic laboratories. There are many standard tests available to accomplish this.

In a high rainfall area such as the North Coast (35-75 inches in 6 months), any substance will either be assimilated onsite or end up in a waterway (including groundwater). I did some quick calculations:

2,500 gallons retardant on 1.8 acres = 11,527 pounds per acre

At 10% ammonium phosphate = 1,153 pounds/ac fertilizer = 58 pounds N + 230 pounds P<sub>2</sub>O<sub>5</sub>. This is a significant, but not high, level of fertilization for tree fruits in our area.

At 5% additives, this is 576 pounds/ac of materials, "inerts" that might have detrimental environmental effects. If the retardants are 1% sodium ferrocyanide, that is 15 pounds/ac, which would be nearly the equivalent of a soil fumigation with some materials...

Under some (typical) conditions, the first flush of materials from the forest could come from the leaves and forest OM, running directly into waterways.

I think screening the retardant materials as formulated with some of the same tests as pesticides (without the onerous registration process) would provide a good level of environmental protection. This would provide an LD 50 for common aquatic organisms, beneficial insects and other organisms.

Gregg Young, M.A. • Environmental Director

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Regards,

Gregg Young, M.A. • Environmental Director