

USDA Forest Service
Attention: Jodi Kramer
1602 Ontario Street
Sandpoint, ID 83864

June 27, 2011

E-Mail: Fire Retardant EIS@fs.fed.us

Dear Jodi:

Thank you for the opportunity to provide comments on the "Aerial Application of Fire Retardant DEIS". Several members of the National Association of Forest Service Retirees (NAFSR) organization have attended the listening sessions scheduled in various locations throughout the country. NAFSR also provided comments and suggestions in a letter dated 11/11/10 as input to your proposal to prepare a DEIS. Those comments are still pertinent in response to the draft EIS.

We appreciate the difficulty of preparing a DEIS in compliance with the court's order. A nationwide analysis focused only on National Forest lands is not very practical in view of the complexity of Forest Management. In addition fires know no boundaries, especially in interface areas that include multiple jurisdictions and fire agencies. Decisions on where and when retardant can be applied could compromise working relationships. Generally we believe you have done a good job pulling together a significant amount of data. Unfortunately what you recommend is often difficult to successfully implement on the ground. In some cases the preferred alternative is not always practical when suppression objectives are trying to be achieved.

It is gratifying to note that the document clearly states throughout that without retardant use wildland firefighters will be less effective at initial and extended attack resulting in larger wildfires and greater property damage and will not meet public expectations that wildfires will be suppressed. The DEIS analysis clearly contradicts a published statement by a spokesperson for the litigant, following release of the DEIS, that the Forest Service failed to make the case for retardant use and has failed to describe the benefits attributed to the use of retardants. One of the benefits the litigants fail to recognize is that retardant use **can and has** prevented the loss of entire areas of critical habitat. This is especially true when retardant is used in southern California in critical coastal sage scrub habitats. These critical habitats are usually right up against communities (Wildland Urban Interface [WUI]) so it is very unlikely that these areas would be mapped out to exclude the use of retardant under Alternative 3.

From the DEIS, it appears there has been additional contact and consultation with U.S. Fish and Wildlife Service, NOAA Fisheries Service and traditional Native American organizations as required by the Federal District Court in Montana. Alternative 3 recognizes this further consultation, in that it includes newly developed 2011 guidelines. However there is no estimate of cost to implement these guidelines, nor recognition of the difficulty to practically implement them from a pilot's viewpoint. It requires one more activity pilots have to perform when the complexity of their current job is already at a maximum level of difficulty.

The table showing "Comparison of Alternatives", starting on page 29, need further analysis and descriptions if it is to be used. For example—under "Fertilizing Effects"—error in calculation of percentage of NFS land effected annually. If you use 200 million acres as the base then only 0.00002 percent of NFS land will be affected annually. "Leaching or Erosion"—under alternate one it should be stated that there will be no applied chemical into streams however ash and natural elements from soil, etc. will go into waterways. Air Quality—under alternatives 2 and 3 it should also be noted that air quality could be improved by keeping fires smaller.

It is our understanding that long-term retardants D75-R and D75-F will no longer be used by the Forest Service after December 2011. If this is the case the chart on P-36 should be changed to eliminate them or at least footnote the fact.

Under the section titles: "Major Conclusions of the Environmental Impact Statement" each alternative's impact is described under each resource. The impacts of fire, because it escaped from an area where retardants were prohibited, was not described. Results from a major conflagration can have significantly more impact on resources including, soils, hydrology, wildlife, etc. than impacts of retardant use. This should be described in detail. According to Alternative 3 the only exception to the guidelines is for threat to human life and safety. We read this to mean the immediate threat not, the potential threat if the fire escapes. Is the latter evaluated in a risk assessment? The details of a risk assessment are not discussed in the DEIS, including the critical time frame to prepare when an incident commander has little time to make a Go or No Go Decision.

Throughout the document, especially, where the affected environment and environmental consequences are discussed, various laws are quoted including the Forest Service responsibilities under those laws. We do not see any references to the Multiple-Use Sustained-Yield Act, Forest and Rangeland Renewable Resources Planning Act, nor to the National Forest Management Act and the impacts of the three alternatives in carrying out the requirement of these Laws. How do Forest Service Line Officers redeem their land management responsibilities when implementing Alternative 3 in accordance with these laws? It leaves the opinion that the Forest Service must comply with the Clean Air Act, Clean Water Act, Endangered Species Act, etc., but the basic Forest Service responsibility is not even discussed. Retirees have a great concern that the purposes for the management and protection of National Forests is not given the priority the American public expects. We stress that this should be made more prominent in the document.

By preparing a nationwide DEIS significant differences between National Forests is not analyzed or discussed. This should be discussed. (For example Southern California National Forests, and many others, are immediately adjacent to major metropolitan areas.) In these forests limitation on use of retardant, especially if a fire escapes initial attack, can compromise fire suppression resulting in major consequences. Private homes, multiple jurisdictions, etc. complicates decision making when one agency is limited on use of retardant on the area it has responsibility to protect.

One fire consequence is potential downstream damage following a fire. This is a subject not covered in the DEIS. A major purpose for the establishment of National Forests is watershed protection. Downstream damage from flooding and mud flows following fires can and has resulted in significant damage to private property and potentially significant threat to human life and injury. Other after fire effects are discussed but not downstream threats and damage. This should be corrected.

We noted a number of typo and other format errors that we can share with you if you chose to contact us.

Thank you for the opportunity to comment. Your preferred alternative would be the most expensive to implement due primarily to mapping and monitoring requirements. It is important that all cost to implement the preferred alternative be shown including costs for each National Forest to prepare maps in advance, required monitoring and process to be used following misapplication. Incident Commanders and pilots should be given maximum flexibility to use retardant within 300 feet of waterways when there is a potential significant inability to keep within suppression objectives that could result in major potential resource damages.

Sincerely,

Allan J. West
Chair, Fire Management Committee
National Association of Forest Service Retirees

--National Association of Forest Service Retirees is an independent, non-partisan, non-profit organization whose members believe in the U.S. Forest Service missions. Colleagues whom dedicated their careers to protecting, developing and managing our Nation's National forest System Lands and advising and cooperating on resource matters throughout the United States and around the World.--