



# Firefighters United for Safety, Ethics, and Ecology

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USDA Forest Service  
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Dear Forest Service,

June 25, 2011

Please accept the following comments from FUSEE on the Draft Environmental Impact Statement (DEIS) for Aerial Application of Fire Retardant. FUSEE is a national nonprofit organization whose members include current, former and retired fire management workers and other concerned citizens. Our mission is to promote safe, ethical, and ecological fire management with the goal of changing the dominant paradigm of fire management from reactive wildfire suppression to proactive ecological restoration.

As a reminder, we provided written scoping comments in a letter dated October 11, 2010, oral comments in private phonecalls to Forest Service and EnviroIssues employees, and we participated in two of the webinars organized by the agency. We commend you on your efforts to solicit the public's help in developing the DEIS, but are thoroughly dismayed that our most critical comments and valid requests for analysis of the cumulative effects of connected fire suppression actions, and the indirect effects of continued fire exclusion, were ignored and are utterly absent from the document. We must assume, therefore, that our concerns were not even considered; consequently, the document is flawed and does not meet its legal obligations under NEPA.

We strongly urge that a Supplemental DEIS be issued that incorporates full analysis and disclosure of our concerns regarding the significant issue of Wildland Fire Management, and clearly relates to the Purpose and Need:

“The use of fire retardant gives the FS the ability to reduce wildfire intensities and rates of spread under certain circumstances ***until ground forces can safely take suppression action*** over the duration of an incident.” (emphasis added)

Suppression action in addition to aerial fire retardant is fully expected and, in fact, is *required* in order for wildfires to be effectively contained and controlled. The agency cannot determine the full impact of retardant use on terrestrial vegetation and wildlife, aquatic habitats and species, water quality, soils, cultural resources, hydrology, scenery management, wilderness character, public health and safety, and especially wildland fire management without including analysis of the indirect and cumulative effects of intended connected fire suppression actions that involve a wide array of suppression tools and techniques.

According to the definition provided in the DEIS' glossary:

“Cumulative Effects—Impacts on environments that result from the incremental impact of an action when added to other past, present, ***and reasonably foreseeable future actions.***” [pg. 151] (emphasis added)

The whole array of suppression tools and techniques that are commonly used with aerial retardant constitute reasonably foreseeable future actions, and thus require cumulative effects analysis.

Additionally, we are disappointed that the document lacked any analysis or disclosure of the effects of attempted fire exclusion with the use of fire retardant and other suppression tools and methods. The DEIS analyzes the use of fire retardant as a positive, beneficial effect on reducing wildfire intensities and rates of spread, yet it fails to analyze how reducing fire the number of acres burned may have adverse impacts on fire-adapted ecosystems and fire-dependent species.

To repeat, the DEIS should have analyzed and disclosed the cumulative effects of connected fire suppression actions. In order to effectively accomplish the purpose and need to control wildfire intensity and spread, fire retardants must be applied along with other suppression methods. These other firefighting activities include but are not limited to:

- Construction of firelines by hand crews, bulldozers, and other heavy equipment.
- Construction of helispots, safety zones, staging grounds for supplies and personnel, and other clearings for suppression operations.
- Backfires, burnout, and other ignition operations.
- Hazard tree felling, especially snags.
- Road construction including reconstruction of previously decommissioned roads.

These and other suppression activities are clearly *connected actions with aerial retardant use*, and the full range of direct, indirect, and cumulative environmental effects of these wildfire suppression methods should have been fully analyzed and disclosed in the DEIS. Additionally, the DEIS should have disclosed the effects and effectiveness of using aerially-applied retardant as the *only* suppression technique applied, and include site-specific examples, if any, where this actually occurred and was effective in containing and controlling wildfire.

The DEIS acknowledges the use of and need for other suppression tools and techniques in addition to aerial fire retardant throughout the document:

“In order to continue with this level of initial attack success rate, ***the use of all effective firefighting tools is critical.***” [Ch. 1-18] (emphasis added)

“The use of fire retardant gives the FS the ability to reduce wildfire intensities and rates of spread under certain circumstances ***until ground forces can safely take suppression action*** over the duration of an incident.” [Ch.1-19] (emphasis added)

“In many situations, ***the use of retardant in concert with firefighters on the ground*** allows the FS to safely meet its responsibilities to protect landscapes, resources, and people.” [Ch.1-22] (emphasis added)

In fact, under “Cumulative Effects” of the proposed action the DEIS states:

***“All other fire suppression tools (Federal and State) will continue to be used.*** Any activity that causes ground disturbance, such as construction of fuel breaks, firelines, and road construction has the potential to affect fish and aquatic habitats, and in turn, the species.” [Ch.3-44] (emphasis added)

This statement is repeated on Ch.3-74 and Ch.3-78.

***“Retardant aircraft are used in conjunction with other resources***, most often in the building and holding of firelines.” [Ch.3-113] The document also implies that aerial retardant can be used to stop a wildfire without the use of other resources, but this is such an extreme rarity that the FEIS must substantiate this claim with data disclosing how many wildfires are suppressed with aerial retardant alone, and how many wildfires are effectively contained and controlled with aerial retardant alone, and what percentage of the total wildfire suppression incidents is aerial retardant the sole, effective suppression tool.

“Retardant is primarily an initial attack (IA) tool used to slow the rate of spread ***until adequate ground resources can arrive.***” [Ch.3-122] (emphasis added)

FUSEE and other groups specifically requested that the DEIS analyze and disclose the cumulative environmental effects of fire suppression tools and techniques that are used alongside and in addition to aerial retardant. The document acknowledged that there is a critical relationship between retardant and other suppression resources, and even promised that they will be used; however, the document failed to include this analysis. The FEIS needs to fully analyze and disclose the full range of cumulative impacts from fire suppression actions that are connected actions with aerial retardant.

We are also disappointed that the DEIS failed to analyze or disclose the cumulative effects of fire exclusion that will result from the continued use of aerial retardant and other resources used in fire suppression. The fact that 98% of wildfires are successfully contained and controlled during initial attack is assumed to be a positive, beneficial environmental effect of aerial retardant; however, the DEIS failed to provide analysis of the negative environmental effects of excluding fire from landscapes and fire-adapted ecosystems.

Volumes of recent scientific studies have documented the widespread adverse effects on fire-dependent species and fire-adapted ecosystems from attempted fire exclusion. The DEIS, in fact, acknowledges that:

“Previous decades of aggressive fire suppression have resulted in widespread hazardous accumulations of flammable vegetation. These are other factors...create increasingly explosive and risk-laden conditions.” [Ch.3-109]

The effects of fire exclusion on hazardous fuel levels and wildfire risk are just one of several negative environmental effects, and the FEIS needs to analyze and disclose other adverse effects of fire exclusion on natural resources, species, and ecosystems. Relatedly, increased wildfire spread or acres burned are assumed to be a negative effect and is described as a “threat” (which turns fire retardant use into a positive effect), but wildfire has several beneficial functions and effects, particularly in fire-adapted ecosystems and fire-dependent species. The FEIS needs to take a more balanced and factually-sound stance and disclose the positive, beneficial roles and effects of wildfire. This, in turn, would result in more disclosure of the role of aerial retardant in reducing the number of acres burned, contributing to continued fire exclusion, and causing negative environmental impacts.

Last but not least, the DEIS states that according to the Interagency Aerial Supervision Guide (2010) that tactical plans for fire suppression prioritize: “1) human safety, 2) structure protection, and 3) natural resources.” [Ch.3-87] However, this order of prioritization does not conform to the interagency Wildland Fire Management Policy that mandates that private property and natural resources should be valued equally in terms of importance and prioritization for suppression resources. The Wildland Fire Management Policy should supercede and direct the priorities of the IAS Guide. The FEIS needs to explain this contradiction.

Systematic wildfire suppression has arguably had the most extensive and adverse impacts on America’s wildlands and native ecosystems compared to other management activities. The fact that suppression methods have never undergone environmental analysis or informed public involvement in accordance with NEPA is inexplicable and unexcusable. This need for analysis and disclosure is long overdue, and the Forest Service should perform this analysis with the utmost of scientific objectivity, analytical rigor, and professional integrity. This kind of comprehensive environmental analysis and informed public involvement is legally necessary because ourselves and others have specifically requested it repeatedly during scoping and other activities leading up to the release of this DEIS, and because it falls within the purpose and need and scope of this project. The agency must adequately inform the American people and policymakers of the risks, costs, and impacts of reactive wildfire suppression methods, including fire retardant, because they indisputably cause significant impacts to the human environment.

In our opinion, the more the Forest Service objectively analyses and truthfully discloses the full array of adverse social, economic, and ecological impacts caused by reactive wildfire suppression actions--including but not limited to aerial fire retardant--the better the case the agency can make to policymakers and the American people for the need to conduct proactive fire and fuels management projects in order to restore fire-adapted ecosystems. Ultimately, it is only through ecological restoration of fire-adapted ecosystems that the working environment for wildland firefighters will be made safer and the fruits of their labors will become more ethically and ecologically sound. It is with that goal of helping fire management professionals with social and ecological conscience to change the paradigm and dominant focus of federal fire management from suppression to restoration that we respectfully submit the above comments.

We therefore strongly urge the Forest Service to start again with a Supplemental DEIS in order to include analysis and disclosure of the full array of connected suppression methods and their direct, indirect, and cumulative impacts. The U.S. Forest Service will do taxpayers and wildland firefighters a great service to analyze fire retardants *and their connected suppression actions* now rather than go through with a narrowly-crafted FEIS of limited scope and social value that will be vulnerable to future litigation because it does not satisfy the requirements of NEPA.

Thank you for this opportunity to provide comments on the DEIS. Please send us any and all future documents and news of any developments related to this NEPA process.

Sincerely,

Timothy Ingalsbee, Ph.D.  
Executive Director, Firefighters United for Safety, Ethics, and Ecology (FUSEE)