

Data Submitted (UTC 11): 1/14/2020 7:00:00 AM

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Comments: NOTE: An electronic version of the commenter's original letter, received via email, is attached

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January 14, 2020

Commentary on the Four Forest Restoration Initiative and its EIS

To start, some information about myself. I am a retired Physician who lived 31 years in Hawaii, moved to Arizona for health reasons, and have now lived in the Verde Valley of central Arizona for 16 years. I have much experience in Hawaii's political and environmental aspects and have done considerable work via the Legislature and the Division of Forestry and Wildlife, including interaction with the U.S. Fish and Wildlife Service. All of this was related to game and environmental management, including forest fires and hunting, in Hawaii's critical Endangered Species setting.

Board Certified in two medical specialties, I was nationally known in both fields via teaching, speaking and innovating, and have testified in Congress. I am also an avocational archaeologist, anthropologist and historian, as well as an expert in old-time Hawaiian culture and arts. Perhaps most important for this commentary, I am a lifelong outdoorsman and have spent countless hours since childhood in the outdoors amongst forest, plain, mountain and stream as off-trail hiker, explorer, site-reporter and in scouting and hunting. I am familiar with the National Forests of this area, especially Coconino.

An EIS is hard to read and fathom, and many a written comment has failed to materialize for that reason. Thus, despite considerable writing experience I have furnished some oral commentary in the past on this and other EIS without actually writing a detailed commentary like this one. It is a daunting and time-consuming effort because of the complexities of an EIS.

I find the Four Forest Restoration Initiative an admirable, well-along, and highly creative endeavor. Yet from long experience of broad scope greatly related to this project, I also find it has critical issues and flaws which need comment. This will be lengthy by necessity and will thus be broken into sections.

Most importantly, as a trained scientist myself it took me many years to realize that science is not a series of facts, but rather a series of paradigms. At any given moment, those engaged in a science-based endeavor like this Initiative are convinced of their correctness, and the longer this goes on, the more that it involves funding and government and regulations and feet on the ground, the more imbedded the conviction becomes. As the funneling mindset of narrowed focus grows tighter, ancillary factors or discovered problems tend to be ignored or even called irrelevant, misguided - or worse. We need only look at former Forest Management practices to be firmly reminded of this insidious process.

Yes, today we have a lot more "science" and experience to draw on, but is the current paradigm[mdash]this Initiative[mdash]a fully valid and reliable one? In a word: No. Simply because the history of science is littered with tried (and later discarded) paradigms -- the field of Medicine being a classic example.

Yet from long experience as a pragmatist, I know that when a ball like this Initiative and its EIS has rolled this far

downhill, gathering speed and strength, the chance that its Alternative #1, No Action, is going to be adopted is virtually nil and at this point is mostly a remnant option of EIS protocol.

Thus, I examine Alternative #2 and #3. I will present the commentaries necessarily critical of the Initiative and also what may make it better and more likely to succeed. This requires a look at various topics: these include people and demographics in the equation; health danger; unexamined information; political issues looming; the Forest Service involvement in business and funding; the Federal Aid in Wildlife Act (Pittman-Robertson Act) and Dingell-Johnson Act; the role of hunters and their potential as assistants and partners in this or other projects; partnership of the Forest Service and AZ Game and Fish Dept.; Road Closures; Stakeholders; regrowth of young trees; and the issue of decreasing funding.

1. People and demographics: A critical flaw in this Initiative is that it speaks of all sorts of environmental issues and potential improvements dear to the heart of the Forest Service and its Stakeholders, while leaving out the great many people who live in the four involved Forests and surrounding areas. The Initiative plan calls for infrastructure protection, yet the basis for infrastructure is people and their lives. These many people are at the very least as important as the restoration of Pine forest and all its ancillaries. The planned controlled burns, going on for many years, affect not only the current population but an expanding one, possibly from birth to death in some instances. All around my home area of Cottonwood lies an estimated population of Coconino and Yavapai Counties numbering 375,000. And that is but a portion of the populations affected by this Initiative.

2. Health danger: Perhaps six years ago, and relating to this EIS, I traveled to the Coconino Forest Service Office in Flagstaff by appointment to present to the Supervisor and about five major staff members this very subject.

I am a Physician and also have had a serious health problem of my own, with potential for stroke or death. Having completely uprooted my life to move to clean-air Arizona from Hawaii due to the effects of the volcanic "vog", I was dismayed to find that the controlled plus occasional natural burns leave such a drastic bowl of smoke in the 15 mile by 10 mile Verde Valley that I was having the same effects here. I had to have yet another tricky and dangerous cardiac procedure, which thankfully much improved me at last, but I am still adversely affected by the smoke in this and other ways. So I was well motivated to try to reduce the frequent controlled burning by making my presentation about its health effects, and had done a lot of demographics and health inquiry.

Notably, I am but a single one of the approximately 375,000 - and many more - people affected by the current and planned burns. Undoubtedly, there are many more stories than my own.

Also, over the past 16 years here I have heard over and over of health problems from the smoke and all it contains from friends, acquaintances and incidental remarks all over this region. And numerous times over the years here I have been asked if I have a cold, due to my irritated nose and often hoarse voice.

To focus this health matter, older people are particularly susceptible in health issues, and the growing population of Yavapai County alone is about 22-23% seniors. Smoke irritates nasal and throat mucous membranes and also lungs, creating inflammation which - arguably - makes infectious disease and possibly deadly dysfunction such as pneumonia more likely. This deserves serious study, yet I have heard it dismissed as of little consequence by Forest Service staff.

The bottom line to this section in print is that I presented my findings orally to the Coconino Supervisor and staff over about 45 minutes, imploring them to greatly reduce the burning for a singular reason: it is not just a matter of whether the created smoke's effects injure people, statistically it will kill people. Not might kill, will. This is a

sobering reality.

3. Unexamined information and missing inquiry and experiences: within the draft EIS I recently received at the Forest Service open house in Flagstaff about this Initiative, we find in the Abstract under (b) Eligibility Criteria, "To be eligible[hellip]a collaborative forest landscape restoration proposal shall[mdash] (1) be based on a landscape restoration proposal that- (C) incorporates the best available science and scientific application tools in ecological restoration strategies;"

I therefore respectfully submit that in this day and age of ubiquitous litigation, the Forest Service, and in particular this Initiative, have failed to fully investigate and incorporate the very real health effects of the existing and planned burning, and in fact the whole grand plan could falter or fail as a result.

Concerning applicable experiences, it would have a major effect on the current planning if those persons in the Forest Service taking part in this Initiative, and some of its stakeholders, could have to live a week in the Verde Valley, it being a prime example amongst multiple other affected areas, when there are one or more controlled burns going on and conditions are right to inundate the valley with smoke - which is often. This is but one area, yet it is like Los Angeles in the 70s and several months ago in just a single week I witnessed the worst smoke there and around Sedona out of my entire 16 years here -not once but twice!

4. Political issues looming: Like it or not, a broad and long project like this needs to pragmatically consider some extremely relevant situations. I think it likely that the program is proceeding without this. The political climate prevailing when this Initiative began is quite different now, as is the President, Secretary of the Interior, and even the Supreme Court. Historical precedent with the current economy makes it very likely the sitting President will be reelected despite stringent efforts to the contrary. And historically, pragmatic thinking plus precedent make it likely that people will be considered more than environment. That is already the case to a degree, but a second term makes it all the more likely. If that is the case, the long-term viability of this project needs to be re-considered, whereas the myopic viewpoint that increasingly occurs with big projects that I mentioned earlier tends to strongly produce exactly the opposite. When a big ball is rolling, particularly when it involves major Federal funding, nobody likes to stop and take stock. But I propose it is necessary.

Consideration for a "Plan B" needs to be made. For example, if some issue results in lawsuit which then makes it to the higher courts and even the Supreme Court, long term plans can be hamstrung for decades. Just ask the U.S. Fish and Wildlife Service. Further, just a cut in funding stemming from the Administration is not unlikely. The Omnibus Public Lands Management Act of 2009 under which this Initiative is occurring is not written in stone, and there remain many ways within its rules and complexity by which a project can blunted or halted. (See item 3 as just one potential hitch.)

5. Forest Service involvement in business: Recently, I was struck by a local newspaper article telling of non-permit "outfitter guides" recently convicted for improper activities in the Coconino National Forest. As a citizen, this does not surprise me, but what really startled me was the further information that many businesses, 42 in the Red Rock Ranger District of Coconino National Forest alone, have permits within the Forest for their highly lucrative businesses, and (euphemistically in my view) they are called "partners with the Forest Service" for various named good purposes, whereas they are estimated to have grossed 36.5 million dollars in 2019 alone, from which \$ 1 million has been paid to the Forest Service. If these "partners" wish to make lot of money off the lands belonging to the public, they are hardly "partners" just because they must follow rules and provide good-will services as smart business practices. The Forest Service, strapped for money, is in fact a landlord under these conditions, with the businesses leasing from them. They are "partners" not by good will but by rules and necessity.

I propose that the public has little knowledge of this and would be largely supportive except for one thing: this business the Forest Service is doing here, or elsewhere, is by its very nature lending itself to preferential

behavior on its part. Example from my own experience is that the worst Forest road damage I ever saw was from a "partner's" Humvee tourist vehicles, which further were traveling at a very dangerous rate of speed in that same area.

It's pertinent to review here that the Red Rock Ranger District alone lost a long-term lawsuit by a single individual troubled by charging the public for day-use permits.

All this relates to the above caveats because in this age of massive information availability and social media, if the Forest Service is found to be favoring certain groups and "partners" during the Initiative, or lacking consideration for other potential "partners", this might be another negative example stemming from one Federal Agency (USDA) not knowing enough about another one (USFWS), as we will get to immediately below. The resulting fallout would not be good for the Initiative, and I submit that is already adversely affecting it. But that need not continue, and the following is a possible avenue to understanding and more harmony.

6. Federal Aid in Wildlife Act (Pittman-Robertson Act) and Dingell-Johnson Act: the Pittman-Robertson (P-R) Act of 1937 placing an 11% tax on guns, ammunition and later on hunting-related items of all sorts, followed by the Dingell-Johnson Act similarly taxing fishing and boating-related items has raised huge funding for wildlife and the environment. These two Acts, particularly the P-R Act, have been instrumental in the return of multiple wildlife species, and vast environmental improvements. Based on their hunting license sales and requiring an input from the States to receive a 75% reimbursement on projects, total distributed Pittman-Robertson funds alone surpassed 12 billion dollars recently. And the combination of the two Acts has distributed \$20 billion to the States by 2018.

In Arizona, the P-R contribution in 2018 for sport-fish restoration was above \$7 million, and that for all wildlife was about \$22 million, for a total of \$29,234,506. Unfortunately, hunting license sales nationwide have been mostly falling, and this results in less distribution of environmental/wildlife funding which is critical to the many functions of the State Fish and Wildlife Agencies. Since they partner with the National Forests for hunting in particular, this becomes something directly relating to this Initiative, and future ones. Why?

Great efforts are going on to recruit and retain more hunters, and thankfully Arizona leads all the States in that its hunter numbers have fallen less than elsewhere thanks to proactive programs. Meanwhile, hunters contribute a huge number of hours on environmental efforts, such as water catchments that benefit all wildlife. The same cannot be said of the anti-hunting or preservationist groups, while conservation through managed use has been unequivocally successful in America.

There's both a key and a catch in this section: The Forest Service looks for funding via the U.S. Dept. of Agriculture (USDA) and its own money-making "partnerships", whereas the Fish and Wildlife agencies look for funding via fickle Legislature funding and the U.S. Fish and Wildlife Service (USFWS) via its profound P-R funds, funds which stem from taxation of sales relating to guns and hunting. These two different agencies, USDA and USFWS, fit the adage about "the dog that does not know its tail is wagging"! Importantly, the P-R funds are available for a wide range of "partners" on the other side of the fence so to speak (USDA), and I submit that the Forest Service may now know just how well off some of their own "partners" could be by applying for grants or other aid under P-R Act provisions. Hence, the Forest Service could be in for more business "partner" funding if this were pursued. And for that to continue and benefit Initiatives like this one, hunter numbers must stay up. Again, why?

Multiple other groups do not pay the mostly 11% tax on all their usage goods like hunters do, and these are just the sort of groups that make up the current Forest Service "partners". Such groups in general howl at the idea of paying a similar tax, and in their collective numbers that makes it extremely unlikely that such a tax would pass Congress. Yet just as hybrid and battery-powered vehicles are coming under increasing pressure to pay their share of highway expenses via other taxation since they are paying no gasoline tax, and their owners are howling

at the idea, we have a similar situation here. The imbalance is fairly well known in the hunting community, yet little known elsewhere. But it should be.

7. The role of hunters and their potential as assistants and partners in this or other projects: As just said, one group, hunters, joined by fishermen and boaters, is carrying a heavy environmental/wildlife/conservation load via self-accepted taxation over many decades of PR funding that a great many people do not know about. Is that true of many in the Forest Service? I suspect so.

The key point in this section is that it would greatly benefit the Forest Service to better "see the forest for the trees", by making "partners" of hunters as well. This might possibly provoke protest amongst some of its "Stakeholders", I surmise, but it reflects reality. Considering the clear and envious track record of hunter groups greatly assisting the Game and Fish Departments, cannot they also be like the FS "permitted outfitters" in that they, too, could be helping with road maintenance and assisting with reporting graffiti, resource damage and wildfires - as the article about "Permitted Outfitters" relates?

This improved relationship would be challenging under current Forest Service (FS) attitudes and practices because, unfortunately, the hunter viewpoint locally is poor concerning the FS - as I have reported. This I propose is because of the separation of the two large agencies, USDA and USFWS. The FS seems to be looking upon the hunters with a sometimes jaundiced eye, forgetting (or failing to even know) that the monies generated by their current paying "partners" for forest usage are far surpassed by the taxation funds via hunters---funds which indirectly affect and support the FS mightily and could affect its well-being and projects greatly in the future by quite legitimate tapping of P-R funding.

8. Partnership of the Forest Service and AZ Game and Fish Dept. and improving hunter attitude toward the FS for this and other projects: why is hunter attitude in this area toward the FS poor? One significant reason is because the FS seems to be putting forth closures of both areas and roads by edict rather than law at a time when voluminous data nationwide shows decreased usage of national monuments, parks and forests along with falling hunter numbers -- and also that the primary cause is repeatedly cited by the public as lack of access. So, if the FS, including this Initiative's Forest units, is following old paradigms of preservation instead of pragmatic and proven conservation via managed use, is that not a case (pardon the pun again) of "not seeing the forest for the trees"?

For example, several years back the seemingly capricious rules for camps and trailers/RVs and road usage on this region's forests, put in place by the respective Forest Supervisors to the best of my knowledge, got so capricious, conflicting and public-angering that the FS's major partner, the Arizona Game and Fish Dept. (AZGFD) decided it was not going to have any part in enforcing these rules. In fact, to my amazement, this went so far as a formal letter released on this subject by the AZGFD. This is disastrous territory for the very important symbiotic relationship of the Game and Fish Department and Arizona FS regions, as well as those of other locales. And the word does get around, both in the Government Agency (FS) and the other State's Game and Fish Departments. High-mindedness in the FS was the cause, in my opinion, and such things are detrimental to the success of FS projects.

Meanwhile, the FS is under increasing Federal mandate to improve hunting and recreational access, while at the same time, it does not have the funds or equipment to enforce these rules to a significant degree. Nonetheless, many in the public have heard that it does have major enforcement and indeed that large fines are in store for rule breakers. Although someone had to have started those intentions that are apparently now reduced to rumors, I have not heard of that happening yet, but I have certainly heard the public's beliefs (and anger) repeatedly.

This variable Forest-by-Forest rule-making simply makes for more animosity and head-butting, which in my view needs fixing for the good of all. In short, the FS would do well to look upon hunters and related forest users as

the partners they already are in very significantly funding the very objectives the FS pursues, and as potential partners on the ground as well. Hunters and hunter groups unquestionably have an enviable volunteer track record throughout the country, and it needs to be tapped by the FS through better understanding.

9. Road closures: this is the perfect continuation of the prior topic. Alternative #2 and #3 of the proposed Initiative both contain 490 miles of existing road decommission and 800 miles of unauthorized road decommission. Nothing is more vexing to today's public than this endeavor, already in considerable implementation. With today's less physically-able public, the declining outdoor venue usage especially by the young, the huge acreage of the Forests versus miniscule roadway acreage by comparison, and the allowed usage by the FS "partners" and cattle as well as sheep, I will be ardently frank in saying that this policy is a feel-good endeavor with minimal upside and grave downside.

As I recently told the Coconino Forest project manager, the apparent FS paradigm that he related to me, saying that there is not more than one-half mile between roads as now planned may look good on the FS flat-plane black-and-white maps sitting on a desk, but are a far cry from the actuality on the ground in rough-terrain Arizona where much of this Initiative is planned. The half-mile distance on the nice-looking map may be instead a very difficult passage across one or more steep and dangerous ravines or small canyons, or a difficult slope to traverse. The associated apparent paradigm that the public should get more fit and thus walk or climb further simply ignores reality to support a paradigm.

Meanwhile, I will again be very frank in stating that the FS maps are virtually useless themselves, being without significant landmarks and contour lines such that even a person with 65 years of map-reading experience, such as myself, is left scratching my head as to where I am when trying to use one. I have thus quit trying, as have others.

Having been on a lot of Forest roads I could readily show anyone interested that some of the closed roads can be traversed by a two-wheel drive vehicle with some ground clearance whereas some "godawful" roads leading to "partner" usage places are open. This is greatly vexing.

What does the current road-closure plan accomplish versus its downside? It apparently pleases those in the FS who view the forests as theirs rather than the public's, and it pleases some of the "stakeholders" as well as perhaps some in government in Washington. It also appears to have been largely drawn in someone's office. But to the point, it blocks continued use of generational camp and hunting sites; hampers hunting and game retrieval by a less physical public; hampers the ability to take out and train children and young hunters; removes feet on the ground who may move a large rock or tree trunk free of charge which then allows fire fighting personnel or other agents ready access especially at night; removes eyes that may spot a fire, sick animal or poacher and report it; and most importantly - it flies in the face of the most urgent call: forest and park usage is going down across the board for the reason called lack of access.

Meanwhile, the public is angry, and it seems it would be apparent that the rancher's gate or polite sign is not molested, whereas the road closure signs are frequently knocked down or even occasionally shot. The FS saying may be that this is costly vandalism, when in reality it is the public protesting in the most apparent way they know how.

I'm saying all this bluntly because it so much relates to much I've written so far. The FS has so very much to gain by being more inclusive with the forest-using community and, in particular, the hunters who can and will observe and assist the forest all over the place as free personnel if only their good will is gained. Road closure is the antithesis of that, no matter its feel-good purpose. It is not worth it and should be removed from the Initiative.

10. Stakeholders: I propose a caveat for this Initiative (and others), based on experience, one that I am very hesitant to voice, yet needs consideration, particularly in a wide-reaching project like this one. My 31 years in

Hawaii deeply involved in environmental issues gave me a jaded view of this oft-used "stakeholders" term. It looks good on paper, and certainly forms a part of impressive reports, yet it can be a two-edged sword. I am not demeaning the well-intentioned members of the FS stakeholders yet am cautioning about the increasingly narrowed focus that may occur, as input from stakeholders to the FS can sometimes take the form of "yes-men" for proposed and actual FS programs. It is easy to believe your plans are perfect when you are being patted on the back, so to speak. This in turn increases the problematic narrowing focus in FS projects I cautioned about early in these comments. My apologies to those offended by these words, yet they need to be said within the context of this whole treatise.

11. Regrowth of young trees: Noting recently that the controlled-burn areas show masses of young pine regrowth after about 3 years, I asked the Coconino project manager Patrick Moore about this recently. I was learning a lot about the Initiative but also sharing a great deal of the above commentaries with him and his colleague Robbin Redman during an excellent 45-minute discourse at the Flagstaff open house. I deferred emotion but was aghast to hear that this regrowth was recognized and would require a re-burn every 8 to 10 years to perpetuate the Forest repair. I must relate that this would be further dismay to a great many of the thousands of humans subject to the effects of this project, and therefore is another open-ended potential glitch for the overall plan due to lack of full analysis, should this long term burning occur. Indeed, if the current burning is statistically going to kill people via its smoke (see section 2), what does this long-range burning do?

12. The issue of decreasing funding: as a final point, the FS needs to be pointedly looking at "Plan B" as said, because any long-range project can be foiled by lack of funding. If outdoor usage and hunting continue to fall, eventually the government will do what they all do - oil some other wheel that is squeaking more loudly. Current calls for more and more government spending will, if they take place on our country's obviously slippery slope of non-employment, virtually guarantee this decreased funding. Thus, plans for this or that by the FS or any other agency need to be approached with eyes wide open, rather than narrowed by the myopic focus I have repeatedly cautioned about. In short - think out of the box. This is easy to say, hard to do.

In closing, my thanks for the courtesy showed me by Patrick Moore and Robbin Redman of the Coconino Office as they politely listened to a great deal of the many words above, while they in turn educated me about this Initiative and several times urged me to put my comments in print. It has taken a long day and a half and more to do it, but I trust it is of use.

Respectfully submitted,

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