



August 20, 2023

Jason Kuiken, Forest Supervisor
Stanislaus National Forest
19777 Greenley Road
Sonora, CA 95270

Regarding: Stanislaus National Forest Hazard Tree Management Project

Supervisor Kuiken,

This letter of comment is submitted on behalf of the California Four Wheel Drive Association (Cal4Wheel) regarding the Hazard Tree Management (HTM) project that is proposed for Stanislaus National Forest (SNF). Many of our members and supporters live in and/or recreate in the area covered by the SNF Land and Resource Management Plan (USDA 1991), and [SNF Forest Plan Direction](#)¹. This letter of comment shall not supplant the rights of other Cal4Wheel agents, representatives, clubs, or individual members from submitting their own comments; SNF should consider and appropriately respond to all comments received to this proposed project.

Cal4Wheel is a non-profit organization comprised of over 3,500 members who champion responsible off-highway vehicle (OHV) recreation while encouraging a strong conservation ethic and individual stewardship. We champion responsible use of public lands for the benefit of all recreationists by educating and empowering our members to secure, protect, and expand shared outdoor recreation access and use by working collaboratively with natural resource managers and other recreationists. Our members use OHVs of all forms, as well as other motorized methods, to enjoy federally managed lands throughout California, including those of SNF. Our members and supporters live in California or travel across the country to visit California and use motorized vehicles to access USDA Forest Service (FS) managed lands throughout the state. Cal4Wheel members visit SNF for motorized recreation to participate in non-motorized and human-powered activity such as sightseeing, photography, hunting, fishing, wildlife and nature study, camping, observing cultural resources, and other similar pursuits on a frequent and regular basis throughout every season of the year. Cal4Wheel members and supporters have concrete, definite, and immediate plans to continue such activities in SNF throughout the future.

GENERAL COMMENTS

We recognize the positive health and social benefits that can be achieved through outdoor recreation. We also recognize that motorized recreation provides business owners in local communities with significant financial stimulus. Of great importance to the impetus for this letter of objections: our members are directly affected by management decisions concerning public safety and hazard tree mitigation and management throughout the full range of landscape in SNF.

Our members subscribe to the tenets of:

- Public access to public lands now, and for all future generations
- Active stewardship to maintain conservation of public lands, and safety for those who enjoy them
- Sharing our natural heritage



Cal4Wheel members as well as the general public desire access to public lands now, including SNF, and in the infinite foreseeable future. Restricting and jeopardizing safe access today deprives our children of the opportunity to enjoy the many natural wonders of public lands. Cal4Wheel members and the general public are deeply concerned about the condition of the environment and public safety. We all desire safe means to access public lands to engage in conservation efforts as well as outdoor recreation. We all desire to share our natural heritage now and in the future. How can our children learn about and appreciate our natural heritage when access to SNF via roads and trails for motorized use are eliminated or restricted due to FS management activity – or lack of proper management activity – when forest landscapes are allowed to deteriorate or burn in catastrophic wildfire due to lack of proper maintenance, and historic routes are blocked or closed to use?

We support any additional comments and objections that encourage SNF to maximize the total mileage and acreage for hazard tree mitigation and management in SNF as this will bear a direct positive impact on the resilience of the landscape and catastrophic wildfire prevention throughout SNF. We strongly advocate against any limitations that may be imposed to the plan that would diminish or eliminate hazard tree mitigation objectives. While a significant portion of the [Rim Fire](#)² and [Donnell Fire](#)³ burn scars were reduced to ash, there are critical areas within and surrounding the burn scars from these and other recent wildfires that remain at severe risk of future catastrophic wildfire, and thus, mitigation efforts are urgently needed. Areas within the burn scars that were incinerated by fire require intensive, ongoing restoration and management to ensure that the burned landscape may be rehabilitated to allow healthy forests, meadows, and wildlife habitat to rebound and thrive once again. Public safety is at significant increased risk in all areas where hazard trees are left unmitigated, both within and outside the burn scars, along roadsides, and throughout the entire forest landscape.

We support any additional comments that encourage SNF to maximize the total sum of acreage for hazard tree removal through implementation of this proposed project. We strongly advocate against any limitations that may be imposed to the plan that would diminish or eliminate hazard tree management objectives.

OHV & OUTDOOR RECREATION / NEPA REVIEW

SNF is a popular area for OHV use and dispersed camping. It covers a large area of the Northern California Sierra Nevada mountain range. Multiple communities that are economically dependent upon the health of the forest and public access to outdoor recreation in the forest, lie inside or within close proximity to SNF. SNF should thus work to maximize OHV use and camping in this area, which can be achieved by ensuring that all current and newly created roads remain open and maintained for use following completion of the HTM project. We do not support the post-project decommissioning of any roads that are constructed or improved for hazard tree removal or management.

The National Environmental Policy Act (NEPA) requires agencies to consider a range of viable alternatives, and the recreation interest in SNF justifies the inclusion of analysis of impact on public access to outdoor recreation as a component of this project. Within the Issues Considered for Analysis in the [Environmental Analysis](#)⁴ (pages 17-37), exhaustive analysis is cited for a comprehensive set of wildlife and environmental concerns, including:

- Terrestrial and aquatic wildlife and wildlife habitat
- Immediate and cumulative effects on terrestrial and aquatic wildlife
- Soil and water quality



- Erosion and sedimentation
- Watershed effects
- Wild and Scenic River segments
- Air emissions
- Greenhouse gas emissions
- Carbon sequestration
- Climate change

Analysis of the impact of this project on recreation interests in SNF is conspicuously missing from the EA. Such analysis should include the immediate and cumulative impacts on public safety, societal mental health, local economies, the OHV economy, and the outdoor recreation economy. As noted above, NEPA requirements stipulate that such analysis must be included as a distinct viable alternative. The leadership and membership of Cal4Wheel are fervent, actively engaged advocates and practitioners of public land conservation and stewardship; as such, we do not advocate for reduction or removal for any component of the existing analysis of impacts on wildlife and the environment as currently noted within the EA. However, we do call out the absence of analysis on recreation and economic interests within the EA. This must be remedied within the draft final decision and documentation for this HTM project.

When crafting forthcoming analysis and decision for this project, Cal4Wheel urges SNF to include comprehensive consideration for the direct social and financial impact on organizations like ours if the agency were to fail to resolve safety concerns resulting from lack of or limitation to hazard tree removal, or if the agency were to decommission roads. We ask SNF to incorporate analysis of impact on OHV, camping, and other outdoor recreation as a component of the final project plan.

NEPA requires agencies to consider a range of viable alternatives, and the recreation interest in SNF justifies the inclusion of analysis of impact on public access to outdoor recreation as a component of this project. OHV roads, improved campsites, and dispersed camping not only serve to facilitate public access to SNF, they also create a thriving economy for outdoor recreation, and function as vital infrastructure for prevention of catastrophic wildfire and support of wildfire fighting efforts. OHV roads form natural fuel breaks across the landscape. They provide routes for firefighters to access remote back country terrain that is otherwise difficult, if not impossible, to address during a wildfire event. Improved campsites and dispersed camping areas provide staging sites for firefighters to establish functional base camps, store and repair equipment, and shelter firefighters throughout the extended timeframes that are often required to extinguish a wildfire.

OHV roads and trails serve as vital fuel breaks to prevent and slow the spread of wildfires across the forest landscape, and to provide firefighters with access to quickly deploy into remote areas of the forest when wildfires occur. Within the Bureau of Land Management (BLM) Environmental Assessment for the Williams Hill Recreation State Plan, the BLM accurately stated on pages 24-25 of the [planning document for WHRA](#)⁵, *"OHV routes and Staging Areas act as fuel breaks, since the vegetation along them is cleared... Construction of OHV routes and Staging Areas will effectively create new, secondary, permanent fuel breaks... OHV routes also serve to provide vehicle access to [remote] areas in order to suppress wildfires or conduct other resource management activities such as removal of dead or dying trees to reduce fuel load."* **Cal4Wheel urges SNF to leverage this HTM project to revisit analysis and designation of un-inventoried, non-system, and user-created roads and trails to ensure maintenance of vital infrastructure for wildfire prevention, and access for wildfire suppression.**



Implementation of hazard tree mitigation and management provides an ideal opportunity to re-open or create OHV roads and trails that align with broader forest management objectives, and serve long-term landscape management needs, while increasing public safety through ingress routes for firefighters and first responders. Whereas another federal agency, BLM, has clearly recognized and acted on leverage of OHV roads and trails as vital fuel breaks on public lands, it is imperative that the FS, as a sister federal agency, should do the same. In accord with the Purpose and Need for this project, restoration of previously closed OHV routes would serve to optimize multiple-use management to serve the best interests of endangered and threatened species and habitat, as well as the safety of humans who reside, work, and recreate in SNF.

For the reasons cited above, we urge SNF to include comprehensive analysis of immediate and cumulative effects on recreation and economic interests within the draft final decision and documentation of the HTM project. This will allow SNF to maintain full alignment with the Purpose and Need for this project, as well as with NEPA requirements to ensure consideration for social and economic impact.

PUBLIC SAFETY & CATASTROPHIC WILDFIRE PREVENTION

While a significant portion of SNF was severely burned in the Rim and Donnell Fires, there are critical areas surrounding these burn scars that remain at severe risk of catastrophic wildfire and mitigation efforts are urgently needed. Removal of hazard trees throughout the SNF landscape, as proposed in this project, will serve to reduce fuel load and excess biomass to prevent the ignition and spread of catastrophic wildfire in the future.

In California, between 2020 and 2022, over 7 million acres were burned by catastrophic wildfire. Wildfire of this type decimates the landscape, incinerating full forests and every form of life that resides in it. As noted in the EA for this project: wildfire, dense overgrowth of forest canopy and understory, and trees weakened by bugs and disease have created excessive fuel load and increase risk to public safety. The result is that SNF is plagued with an excessive volume of dead, dying, and weakened trees. The current condition of the landscape in SNF not only serves as a detriment to public safety due to increased risk of future catastrophic wildfire, it also places the public at risk of injury or death due to falling trees and tree limbs. The EA states:

"When there is an imminent direct or indirect threat to safety of the public, FS staff, firefighters, emergency response personnel, law enforcement, private landowners, contractors, special use permit holders and others, it is a Forest Service priority to abate the safety hazard. If hazard trees are left unabated, they may fall on roads, motorized trails, and facilities and either cause direct injury or death to people (such as a tree falls on a tent with a family sleeping inside) or indirect injury or death (for example, a tree falls across a road and a driver strikes the downed tree after coming around a blind curve). The Chief of the Forest Service and the regional forester repeatedly stress that the safety of the public and our employees is our central concern. Therefore, identification and mitigation of hazard trees to provide for a reduced hazard environment for both the public and administrative use of affected roads, high-use motorized trails, recreation areas, and facilities is a priority for the Forest Service." (page 3).



We therefore assert full support for the items noted within the EA as the Purpose and Need for this project (pages 3-6):

1. *There is a need to reduce safety hazards adjacent to roads, high use motorized trails and facilities.*
2. *There is a need to maintain access and the integrity and utility of National Forest System roads, high-use motorized trails, and facilities.*
3. *There is a need to reduce fuel loading associated with dead, dying, fire-damaged, and already fallen hazard trees adjacent to roads, high-use motorized trails, and facilities.*
4. *There is a need for economic and operational efficiency.*
5. *There is a need to retain some dead and dying trees and downed woody biomass on the landscape to the extent that doing so will not substantially undermine the other core project purposes (Items 1-4) of this project.*

Over the last several decades, natural wildfire has been suppressed and an increased density of trees and underbrush have choked the land and created the perfect conditions for total destruction by catastrophic wildfire, as we experienced through the Rim and Donnell Fires. We urge SNF to take action now through this project to maximize the scope of the roadside mileage and sum of acreage that is designated for immediate hazard tree removal and ongoing management. It is more critical now than ever, that SNF take action to thin the unburned forest from over-density of trees and brush to restore healthy balance and make the forest more resilient to survive future fires. Additionally, it is vital that SNF incorporate a detailed long-term maintenance plan into the scope of post-project implementation, to ensure that the landscape and roadsides that are cleared of hazard trees are sustained in such condition for perpetuity.

We ask SNF to:

- **Retain all 2,049 miles of road, and 125,278 gross acres, that are slated for hazard tree mitigation and management in the Draft EA document within the final draft for implementation**
- **Add ML 1 roads to the roadside hazard tree removal segment of this project**
- **Prioritize ML 1 and 2 roads for hazard tree removal to ensure immediate and long-term preservation of access to remote areas of SNF to provide firefighters with safe, navigable roads to address wildfires that may occur in the future**
- **Create a detailed long-term maintenance plan to be implemented following completion of initial hazard tree removal efforts**

ALIGNMENT & FULFILLMENT OF THE SNF LAND & RESOURCE MANAGEMENT PLAN

Cal4Wheel supports the concept of managed recreation and believes it is prudent management to identify and maintain areas where OHV use is appropriate. Such use must be consistent with the public lands management plans, the Plan Standards, and all other requirements found in the Plans, as well as state and federal regulations. Recreation, especially recreation off of paved or gravel roads, is the leading source of growth in visitors to public lands today. Maintenance and improvement of road conditions aligns with the goals and purpose of public land management plans, and helps to minimize conflicts and potential resource damage while providing access for outdoor recreation.



As noted in the EA document,

"This project has been developed in compliance with the Forest Plan. The pertinent specialists have reviewed the purpose and need, proposed action, and management requirements and have provided supporting analysis and rationale for how the project is consistent with the Forest Plan." (page 38).

This project has been developed in alignment with the National Forest Management Act requirement for consistency with the SNF Land Management Plan. Furthermore, the USDA Forest Service Pacific Southwest Region Hazard Tree Identification and Mitigation guidelines as set forth in the Forest Health Protection Technical Report (USDA 2022, FHP Report #RO-22-01), provides detailed instruction and directs SNF to remove hazard trees from roadsides on an ongoing basis as part of regular forest management, and, after catastrophic events like the Rim and Donnell Fires.

In anticipation of potential for this project to be contested legally by groups who focus on obfuscating all tree cutting projects on public lands, including hazard tree removal projects, **Cal4Wheel urges SNF to remain firm and steadfast throughout the scoping, analysis, objection, final decision, and implementation phases of this project to ensure that it is effective in achieving the core project goals through implementation of the full original scope of the project.** The core goals serve the best interests of all who reside and recreate in and around SNF by increasing public safety, mitigating risk of catastrophic wildfire, and ensuring that SNF staff may continue carrying out their obligation to manage SNF in an effective manner to fulfill the US Forest Service multiple-use objective. **We urge SNF to weigh the significant negative implications that reduction or cessation of this project will have on the general public when facing procedural or legal challenges to project implementation from special interest environmentalist groups.** The mission of the USDA Forest Service is to: [*"Sustain the health, diversity, and productivity of the forest to meet the needs of present and future generations."*](#)⁶ **Implementation of the full original scope of this project will allow SNF to serve the needs of present and future generations by increasing the health and resilience of the forest while improving public safety.**

PARTNERSHIP THROUGH VOLUNTEERISM

To support hazard tree removal efforts now, and long-term maintenance in the future, Cal4Wheel offers support through membership volunteers. Cal4Wheel takes pride in a deep history of contribution to construction, improvement, and maintenance of roads, trails, and campsites that are located on public lands through club "adoption" of specific sites as long-term commitments. Cal4Wheel membership includes licensed Sawyers who are certified at both the Forest and National levels. We ask SNF to consider this tangible offer of support as part of the resources available to ensure the success of the HTM project and post-project maintenance.

CLOSING

We would like to close by acknowledging that the HTM project presents SNF with an important opportunity to not only positively impact the health and resilience of the forest, but also improve prevention of catastrophic wildfire, increase social and economic welfare of local communities, and increase public access to all forms of outdoor recreation in alignment with the US Forest Service directive to maintain and expand the multiple-use objective.



California 4 Wheel Drive Association would like to be considered an interested public for this project. Information can be sent to the following address and email address:

Rose Winn
California 4 Wheel Drive Association
8120 36th Avenue
Sacramento, CA 95824
rwinn@cal4nrc.com

Sincerely,

Rose Winn
Natural Resources Consultant
California 4 Wheel Drive Association

References

1. US Department of Agriculture. Stanislaus National Forest, Forest Plan Direction. March 2017.
https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd535378.pdf
2. US Department of Agriculture. Rim Fire. Accessed August 1, 2023.
<https://www.fs.usda.gov/detail/stanislaus/home/?cid=stelprdb5442963>
3. Cal Fire. Donnell Fire. Accessed August 1, 2023.
<https://www.fire.ca.gov/incidents/2018/8/1/donnell-fire>
4. USDA Department of Agriculture. Stanislaus National Forest Hazard Tree Management. Environmental Assessment and Finding of No Significant Impact. July 2023.
<https://www.fs.usda.gov/project/?project=63553>
5. Bureau of Land Management. Draft Williams Hill Off-Highway Vehicle Recreation Plan and Environmental Assessment. 2021.
https://eplanning.blm.gov/public_projects/2014037/200487052/20057857/250064039/DOI-BLM-CA-C090-2021-0014-EA-draft.pdf
6. USDA Department of Agriculture. Meet the Forest Service. What is the Forest Service Mission?
<https://www.fs.usda.gov/about-agency/meet-forest-service>