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First name: Rose

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Organization: California Four Wheel Drive Association

Title: Natural Resources Consultant

Comments: To: U.S. Forest Service, R6 - Pacific Northwest Region All Units

Re: Northwest Forest Plan Amendment, Draft Environmental Impact Statement

California Four Wheel Drive Association (Cal4Wheel) is submitting the attached comment letter to provide feedback for the U.S. Forest Service (FS) proposed Northwest Forest Plan Amendment.

Cal4Wheel would like to be considered an interested public for this proposed listing. 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](mailto:rwinn@cal4nrc.com)

Sincerely,

Rose Winn

Natural Resource Consultant

California 4 Wheel Drive Association

March 17, 2025

U.S. Forest Service, R6 - Pacific Northwest Region All Units 1220 SW 3rd Avenue, STE 310

Portland, OR 97204

Re: Northwest Forest Plan Amendment, Draft Environmental Impact Statement

To Whom It May Concern:

California Four Wheel Drive Association (Cal4Wheel) is writing to provide feedback for the U.S.

Forest Service (FS) proposed Northwest Forest Plan Amendment<sup>1</sup> (NFPA). Many of our members and supporters live near and/or recreate in the areas that fall within the footprint of the NFPA. This letter of comment shall not supplant the rights of other Cal4Wheel agents, representatives, clubs, or individual members from submitting their own comments; the FS should consider and appropriately respond to all comments received for this proposed amendment.

Cal4Wheel is a non-profit organization that champions responsible off-highway vehicle (OHV) recreation and encourages 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. As active conservationists and vested stewards of public lands, Cal4Wheel members care deeply about the preservation and protection of all flora and fauna that reside in California's public lands. Cal4Wheel members are actively involved in efforts to maintain and improve the quality of habitat for wildlife across the state, including leading cleanup crews to remove trash and foreign debris from wildlands, conducting road and trail maintenance to prevent degradation to wildlands, creating and repairing signage to ensure recreationists remain on designated routes, planting trees, removing weeds and invasive plant species, and rehabilitating habitat for wildlife. Cal4Wheel members continually contribute to the conservation and health of California's public lands to ensure that everyone may enjoy the state's beautiful public lands now and for all generations to come.

Our members use OHVs and other motorized and unmotorized methods to enjoy federally managed lands throughout California and the United States, including the areas of public land encompassed within the footprint of the NFPA. Our members and supporters live in California or travel across the country to visit California to use motorized vehicles to access public lands throughout the state.

Cal4Wheel members visit the areas of public land noted in this proposed amendment 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 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 comment letter: our members are directly affected by management decisions concerning public land use in FS Region 6.

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 and in the infinite foreseeable future. Restricting 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. They desire safe means to access public lands to engage in conservation efforts as well as outdoor recreation. The public desires to share our natural heritage now and in the future. How can our children learn about and appreciate our natural heritage when access to public lands via roads and trails for motorized use are eliminated or restricted due to FS management activity, when public lands are allowed to deteriorate due to lack of proper maintenance, and historic routes are blocked or closed to use?

As noted in the NFPA, the footprint of this project covers 17 national forests, equating to many millions of acres of public land. This footprint encompasses a vast quantity of OHV routes, developed and dispersed camp sites, and other outdoor recreation sites, all of which form core areas of high-value use for Cal4Wheel members. Cal4Wheel supports the concept of managed recreation and believes it is prudent to identify areas where off-highway vehicle (OHV) use is appropriate.

Recreation, especially recreation off of paved or gravel roads, is the leading cause of growth in visitors to public lands<sup>2</sup>. This is a longstanding trend, and it is critical to note, California has led the nation as the state with the highest percentage of population and number of participants in OHV

recreation since 2008. The US OHV market is worth more than \$10 billion, and California represents over 10% of that market share. It is clear that public interest in OHV recreation is a dominant value and preferred mode of outdoor recreation for residents of California. The NFPA bears direct impact on the future of outdoor recreation and OHV access as economic drivers for the communities that serve as gateways to the 17 national forests within the NFPA.

We support any additional comments that encourage the FS to protect and optimize public access for OHV recreation and general outdoor recreation. We further support any additional comments that support maximizing

the total acreage across all 17 national forests for fuel reduction and vegetation management, wildfire resilience, and catastrophic wildfire prevention through decision making and implementation for the Northwest Forest Plan, and any amendment imposed upon it. We strongly advocate against any limitations that may be imposed on the plan that would diminish or eliminate public access for OHV and general outdoor recreation, landscape restoration, and wildfire prevention objectives.

#### Lack of Justification to Amend the Northwest Forest Plan

We strongly urge the FS to halt the ongoing amendment process for the Northwest Forest Plan. The proposed amendments represent an unnecessary bureaucratic process that diverts critical resources away from real land management needs while restricting access to public lands. Given existing fiscal constraints and shifting policy priorities, this amendment process should not proceed.

As of today's date, federal agencies are currently under a project freeze. The FS and other federal agencies have indefinitely delayed essential projects, including recreation improvements, land management updates, and infrastructure repairs, due to budget shortfalls and policy shifts (Congressional Research Service, 2023). It is unacceptable that this amendment process continues while critical projects that directly benefit public land users remain unfunded.

It is imperative to note: the climate change directive (Executive Order 14008) behind this plan has been rescinded. The NFPA relies heavily on Executive Order 14008, which previously directed agencies to adopt broad climate policies. However, with this order now rescinded, the amendment process is no longer aligned with current federal priorities (Federal Register, 2023).

Proceeding with an outdated directive undermines the integrity of agency decision-making and wastes taxpayer dollars.

Instead of addressing immediate land management concerns such as wildfire mitigation, trail maintenance, and sustainable recreation access, the FS is allocating significant resources to an

unnecessary planning process through the NFPA. According to the Government Accountability Office (GAO), federal land agencies already struggle with funding shortfalls for essential services, making it impractical to continue investing in a redundant policy revision (GAO, 2023).

#### Public Lands Should Be Managed for Multiple Use

The original Northwest Forest Plan already imposes heavy restrictions on land access, prioritizing preservation over a sustainable, balanced, multiple-use approach to management of the 17 national forests contained within the NFPA. Further amendments could lead to increased road closures, reduced recreational access, and economic losses for rural communities dependent on outdoor

recreation and forestry (Outdoor Industry Association, 2022). Public lands should remain open for multiple-use purposes, including recreation, resource management, and conservation efforts, rather than becoming increasingly restricted through excessive regulatory measures.

Closing

The FS must prioritize real land management needs over unnecessary bureaucratic revisions. Halting the NFPA process will allow resources to be directed where they are truly needed—ensuring responsible forest management, maintaining infrastructure, and keeping public lands accessible for outdoor recreation and all multiple-use stakeholders. I urge you to put this amendment process on hold and refocus efforts on tangible land management priorities.

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

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California 4 Wheel Drive Association 8120 36th Avenue

Sacramento, CA 95824 [rwinn@cal4nrc.com](mailto:rwinn@cal4nrc.com)

Sincerely, []

Natural Resource Consultant

California 4 Wheel Drive Association

ATTACHMENT-LETTER TEXT: C4WDA - Northwest Forest Plan Amendment Comment.pdf; This is the same content that is coded in text box; it was originally included as an attachment