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Organization: California 4 Wheel Drive Association
Title: Natural Resources Consultant
Comments: March 18, 2022

Dean Gould, Forest Supervisor
Sierra National Forest
1600 Tollhouse Road
Clovis, CA 93611

Regarding: Creek Fire Restoration Project

Mr. Gould,

California 4 Wheel Drive Association (Cal4) is writing to provide feedback for the Creek Fire Restoration (CFR) project that is proposed for Sierra National Forest (SNF). Cal4 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. Our members use OHVs of all forms, as well as other motorized methods, to enjoy federally managed lands throughout California and the United States, 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 US Forest Service (USFS) managed lands throughout the state. Cal4 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. Cal4 members and supporters have concrete, definite, and immediate plans to continue such activities throughout the future.

General Comments

We support any additional comments that encourage the USFS to maximize the total acreage for restoration of SNF, resilience, and catastrophic wildfire prevention through implementation of the CFR proposal. We strongly advocate against any limitations that may be imposed to the plan that would diminish or eliminate restoration and wildfire prevention objectives. While a significant portion of the Creek Fire burn scar has been reduced to ash, there are critical areas surrounding the burn scar that remain at severe risk of catastrophic wildfire and mitigation efforts are urgently needed. Areas within the burn scar that had all vegetation incinerated by the 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.

One of the biggest threats to the health and resilience of SNF today is catastrophic wildfire. In California, between 2020 and 2021, over 6.8 million acres were burned by catastrophic wildfire, including the 380,000 acres that burned in SNF from the Creek Fire. Wildfire of this type decimates the landscape, incinerating full forests and every form of life that resides in it. As noted in the scoping documents for this project, large portions of SNF were not burned by the Creek Fire and thus it is imperative to approach restoration from two angles: one, rehabilitation of burned land, and two, improved health and resilience of the remaining unburned land. 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 Creek Fire. We urge SNF to take action now through the CFR project to expand the scope of the project to address both burned and unburned land within the borders of SNF. 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 full forest more resilient to survive future fires. Additionally, it is vital that SNF incorporate a detailed long-term forest maintenance plan into the scope of post-CFR-project action, to ensure that efforts to restore burned terrain and prevent wildfire in unburned terrain are sustained for perpetuity. We ask SNF to expand the boundaries of the CFR project to include not only selected pieces of terrain within the burn scar, but also:

*Remote back country and designated roadless areas within the burn scar that are now omitted from the project for restoration efforts

*The full range of SNF for fuel reduction and wildfire prevention efforts

*A detailed long-term maintenance plan to be implemented following completion of initial restoration efforts

OHV & Outdoor Recreation

The area of SNF contained within the boundaries of the CFR project is a popular area of off-highway use and dispersed camping. It covers a large area of the Central 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 the boundaries of the CFR project. USFS 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 CFR project. We do not support the post-project decommissioning of any roads that are constructed or improved for CFR. 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. In its current form, the project scoping document does not include adequate consideration for the direct social and financial impact on organizations like ours if the agency were to decommission roads. We ask the USFS to incorporate analysis of impact on OHV, camping, and other outdoor recreation as a component of the final project plan.

Additionally, significant volume of OHV roads, improved campsites, and dispersed camping areas have been closed and decommissioned by SNF over the course of the last several decades. While these historical closures occurred for a variety of reasons, it is pertinent for SNF to thoroughly evaluate the impact of those closures in relationship to the scale of destruction inflicted by the Creek Fire. OHV roads, improved campsites, and dispersed camping not only serve to create a thriving economy for outdoor recreation, they also 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 also 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. We ask the USFS to include an itemized inventory of OHV roads, improved campsites, and dispersed camping areas that fall within SNF that have been closed and/or decommissioned from 1980 to the present date. We further ask the USFS to incorporate restoration of those OHV roads, campsites, and dispersed camping into the scope of plan for the CFR project.

A partial list of roads and trails that lie within the currently defined CFR project boundaries include 8S10, 9S66, 9S69, 9S15, 25E306, 9S23, 9S14, 9S09, 25E309, 9S02, 25E210, and 26E328 (these are all routes within the Tamarack, South Fork, and Bald Mountain OHV area). Additional roads and recreation areas include Mt. Tom, Brown Cone, Clover Meadow, Whiskey Falls, and Hell's Half Acre.

A partial list of roads, trails, and campsites that lie within SNF and have been previously closed, that would serve as vital fuel breaks, firefighter access routes, and firefighter staging areas include: 10S69, the Miami Trail,

Swanson Meadow campground, Gigantia campground, and Fence Meadow remote dispersed camping.

There are, of course, many more areas to add to a full inventory of OHV routes, improved campsites, and dispersed camping areas. The items noted above are intended to provide an initial list to build from. To support efforts to develop a full inventory, Cal4 offers volunteers through membership to survey and itemize the terrain across the Creek Fire burn scar as well as the full SNF.

Additionally, to support restoration efforts now, and long-term maintenance in the future, Cal4 offers support through membership volunteers. Cal4 takes pride in a deep history of contribution to construction, improvement, and maintenance of OHV roads, trails, and campsites through club "adoption" of specific sites as long-term commitments. We ask SNF to consider this tangible offer of support as part of the resources available to ensure the success of the CFR project and post-project maintenance.

Users with Disabilities

We recommend that the USFS use this CFR project to finally begin to reverse its decades-long systematic discrimination against those with mobility-impairment-related disabilities. The USFS has committed to manage our public lands for public benefit. Forest closures, including OHV road closures, that eliminate or restrict motorized access create discrimination against people with disabilities. We believe that maintaining motorized access to public lands is critically important, as it provides a mode of access that persons with disabilities can use and enjoy.

On his first day in office, Biden issued an "Executive Order on Advancing Racial Equity and Support for Underserved Communities Through the Federal Government (EO14008)." This executive order established "an ambitious whole-of-government equity agenda" which focuses on addressing "entrenched disparities in our laws and public policies," and mandates a "comprehensive approach to advancing equity for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality."

Under this executive order, "The term 'equity' means the consistent and systematic fair, just, and impartial treatment of all individuals, including individuals who belong to underserved communities that have been denied such treatment, such as ... persons with disabilities...." Historically, there has been no group more greatly marginalized and excluded by public land management policies, and motorized travel management policies in particular, than people with disabilities. Outdoor enthusiasts with ambulatory disabilities frequently rely on motorized travel as their sole means to enjoy recreating on public lands. Not everyone has the ability to hike into a remote back country area, but many such people are still able to drive Jeeps, side-by-sides, and ATVs, which are restricted to the designated motorized route network.

Motorized access eliminates ableist bias in forest management policies, which aligns with the goals of EO14008. Management policies that focus on minimizing motorized recreation have caused significant decrease in public access to public lands over many decades; this has disproportionately impacted people with disabilities. In alignment with EO14008, we urge the USFS to advance equity in public access to SNF by removing policies that discriminate against those with disabilities. For the CFR project, we ask that USFS preserve all existing roads and trails, conduct maintenance to retain all roads and trails that are created for the purpose of implementing this project, and reopen roads and trails that have been closed within SNF since 1980.

Social & Economic Impact

The US Forest Service motto is "Caring for the Land and Serving People." In alignment with this motto, we advocate for consideration of social and economic impacts within USFS management policies generally, and within the scope of impact for the CFR project specifically. The negative economic impact from the Creek Fire

was massive for Fresno and Madera counties. The Creek Fire created especially difficult hardship for the foothill and mountain communities in and near SNF. Restoration of land within the Creek Fire burn scar, as well as fuel reduction and vegetation management to prevent future incidents of catastrophic wildfire in SNF, bear great potential to rebuild and revitalize this sector of the economy and mountain communities.

Socioeconomic loss from catastrophic wildfire has both immediate and long-term impacts including loss of economic viability across the community due to forest closures that halt public access, outdoor recreation, and tourism across the region from regular seasonal ventures such as OHV and snowmobile excursions, camping, hiking, hunting, fishing, foraging, and related activities. Catastrophic wildfire is the attributed cause of an estimated \$150 billion in financial loss in California in 2020. In addition to the forms of loss as noted above, this estimate also includes economic losses related to highway closures, evacuations, increased insurance premiums, firefighting costs, flight cancellations and health effects by hazardous air conditions.

We ask the USFS to seriously, carefully, and thoroughly evaluate potential socioeconomic impacts when considering the scope of implementation for the CFR project. The USFS carries the weight of responsibility for potential negative socioeconomic impacts, as the USFS also carries the responsibility of managing public lands within SNF. There are many private citizens who, as residents, business owners, and outdoor recreationists within SNF boundaries, have advocated for many years to request that SNF engage in effective fuel reduction and vegetation management. Many of these private citizens would in fact have taken part in thinning trees, underbrush, deadwood, and excess biomass in SNF if it were permissible for private citizens to do so. Whereas SNF is USFS managed land, the USFS bears responsibility for vegetation management and bars private citizens from implementing such projects independently. At this point in time, with the Creek Fire as an incident of hindsight to reflect on, it is abundantly clear that lack of effective vegetation management within SNF by USFS was a massive contributing factor to the scale of destruction that the Creek Fire inflicted on 380,000 acres of public and private land in Fresno and Madera counties. With widespread understanding of the value and critical need for effective vegetation management within SNF, a choice to continue existing vegetation management practices and NOT implement fuel reduction measures for catastrophic wildfire prevention, could be assessed as an act of intentional or gross negligence by the USFS - negligence that bears immediate, persistent, and severe socioeconomic hardship on the citizens of Fresno and Madera counties.

Of equal importance to assessing the socioeconomic loss from catastrophic fire, is assessment of socioeconomic gain through implementation of vegetation management projects that would restore the SNF to greater resilience to future fire incidents. The unburned landscape within SNF has become severely overgrown with an excess of trees, underbrush, deadwood, and other biomass. This is an issue that has developed over many decades, and thus, the core factors are fully understood. If SNF is to be restored to healthy and resilient status, it is critical to resolve over densification through logging, salvage, and removal of excess timber and deadwood. Congressman Tom McClintock correctly stated in a presentation to support The Resilient Federal Forest Act of 2015, "There's an old adage that excess timber comes out of the forest one way or the other. It's either carried out, or it burns out."

In fact, excess timber has not been effectively removed from federal forest lands for over 30 consecutive years. As noted in an article sharing critique of the role of extreme environmentalism as a direct causal factor for extreme wildfire in California, from 1960 to 1990, 10.3 billion board feet of timber were removed from federal forest land each year. From 1991 to 2000 that number dropped to 2.1 billion board feet of timber per year, and has remained at an average of about 2.5 billion board feet per year from 2000 to 2021. Simple calculations quickly demonstrate how the dramatic decrease in removal of timber from federally managed land for over 30 years has contributed to overly dense, fire prone forests.

Removal of excess timber would stimulate socioeconomic health in the communities that lie in and near SNF through growth in jobs and commerce. Forestry and outdoor recreation represent vital components of the economy in the communities that are local to SNF. In 2020, national GDP from the outdoor recreation industry

produced \$374 billion. California takes the lead in financial value added by outdoor recreation over other states across the nation, contributing nearly 12% of the national total, equating to \$44 billion in GDP in 2020. Of that \$44 billion, \$1.2 billion is attributed directly to the forestry industry. We advocate for implementation of fuel reduction and vegetation management within unburned segments of SNF to be added to the scope of the CFR project in order to maximize the broad socioeconomic benefits that this project will facilitate through timber harvest, salvage, and sale.

Additionally, it is pertinent to consider the socioeconomic impact of OHV recreation specifically as a core area of impact by the CFR project. Central California boasts the largest network of OHV routes in the state, with thousands of miles of OHV roads contained within SNF. Over 2,000 miles of OHV routes are held within Fresno County alone. This network of OHV roads and trails serves as a major draw for OHV enthusiasts from across California and the US to visit SNF for outdoor recreation. Visitors represent a massive contribution to the local economy, as they spend money for lodging, food, and tourism. With reference again to the USFS motto, "Caring for the Land and Serving People," it is critical for SNF to prioritize preservation, restoration, and maintenance of OHV roads and trails as part of the scope of the CFR project in order to help local communities rebuild through economic growth and stability.

We would like to close by acknowledging that the CFR project presents SNF with an important opportunity to positively impact not only the restoration of the forest, but also revitalization of communities, local economies, and protection of public access to public lands. Effective implementation of this project will not only serve to restore the forest to healthy balance, it will also maximize prevention of catastrophic wildfire, increase social and economic welfare of local communities through enhanced safety and access for outdoor recreation industry opportunities, increase economic growth and sustainability for local communities through timber harvest, tree salvage, and other forest industry opportunities, increase public access to outdoor recreation, and decrease discrimination of disabled persons to access outdoor recreation.

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:

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Sincerely,

Rose Winn
Natural Resources Consultant
California 4 Wheel Drive Association