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Comments: Thank you for the opportunity to comment on the Draft EA. Please find my comment letter attached as a PDF file.
California Four Wheel Drive Association (Cal4Wheel) is writing to provide feedback for the Creek Fire Restoration (CFR) project Draft Environmental Assessment for Sierra National Forest (SNF). 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. 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. 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 throughout the future.General CommentsWe support any additional comments that encourage SNF to maximize the total acreage for restoration of SNF, resilience, and catastrophic wildfire prevention through implementation of the CFR project. 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 within and surrounding the burn scar that remain at severe risk of catastrophic wildfire and mitigation efforts are urgently needed. Areas within the burn scar that were 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. We appreciate that SNF will focus on restoration of burned landscape, fuel reduction to build wildfire resilience within areas that were not burned, and hazardous tree abatement as core priorities for the CFR project (Draft EA: Purpose and Need, page 4).OHV & Outdoor RecreationThe 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. 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 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. Within Cal4Wheel comments for the Scoping phase of the CFR project, we noted that the project scoping document did not include adequate consideration for the direct social and financial impact on organizations like ours if the agency were to decommission roads. We appreciate that SNF has included consideration of impact on OHV, camping, and other outdoor recreation as a component of the Draft EA. Of note, we commend SNF for specifying that existing recreational roads will not be decommissioned as part of the CFR project (page 11, and 48).As noted in Cal4Wheel comments for the Scoping phase of the CFR project, a 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 urge SNF to develop 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 SNF to incorporate restoration of those OHV roads, campsites, and dispersed camping into the implementation plan for the CFR project.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, Cal4Wheel 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, Cal4Wheel offers support through membership volunteers. Cal4Wheel takes pride in a rich legacy of contribution to construction, improvement, and maintenance of OHV roads, trails, and campsites through club [ldquo]adoption[rdquo] of specific sites as long-term commitments. Cal4Wheel participation in the SNF Adopt-A-Trail program is longstanding. 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 DisabilitiesWithin Cal4Wheel comments for the Scoping phase of the CFR project, we recommended that SNF use this 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. 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 [ldquo]Executive Order on Advancing Racial Equity and Support for Underserved Communities Through the Federal Government (EO13985).[rdquo] This executive order established [ldquo]an ambitious whole-of-government equity agenda[rdquo] which focuses on addressing [ldquo]entrenched disparities in our laws and public policies,[rdquo] and mandates a [ldquo]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.[rdquo]Under this executive order, [ldquo]The term [lsquo]equity[rsquo] 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....[rdquo] 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 EO13985. 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 EO13985, 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 again express appreciation for SNF[rsquo]s commitment to preserve all existing roads and trails within the project plan. We urge SNF to extend their commitment to eliminate ableist bias in public access regulations by reopening roads and trails that have been closed within SNF since 1980. There is a unique and important opportunity for SNF to be a trendsetter in restoring and building new roads and trails as part of the CFR project. New roads and trails may be designed to optimally traverse the landscape in a manner that idealistically balances the needs and interests of public access, flora, and fauna.We would like to close by acknowledging that within the Draft EA for the CFR project, SNF has demonstrated a strong commitment 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 serve to restore the forest to healthy balance, prevent future catastrophic wildfire, increase social and economic welfare of local communities through enhanced safety and access for outdoor recreation industry opportunities, and increase economic growth and sustainability for local communities through timber harvest, tree salvage, and other forest industry opportunities. We urge SNF to elevate the positive impact of the CFR project further by increasing general public access and decreasing discrimination of disabled persons to access outdoor recreation through restoration of previously decommissioned OHV roads and trails.California Four 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: