



June 16, 2023

Brian Brown, NEPA Planner
Eldorado National Forest
4260 Eight Mile Road
Camino, CA 95709

Regarding: Caldor Fire Restoration Project

Mr. Brown,

California Four Wheel Drive Association (Cal4Wheel) is writing to provide feedback for the [Caldor Fire Restoration Project](#)¹ (CFRP) that is proposed for Eldorado National Forest (ENF). Many of our members and supporters live near and/or recreate in the area encompassed by ENF. This letter of comment shall not supplant the rights of other Cal4Wheel agents, representatives, clubs, or individual members from submitting their own comments; the US Forest Service (FS) should consider and appropriately respond to all comments received for the CFRP.

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 public land 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 ENF. Our members and supporters live in California or travel across the country to visit California and use motorized vehicles to access FS managed lands throughout the state. Cal4Wheel members visit ENF 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 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 ENF, including and especially, decisions specific to the CFRP.

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 land landscapes are allowed to deteriorate due to lack of proper maintenance, and historic routes are blocked or closed to use?

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](#)². This is a longstanding trend, and it is critical to note, [California has led the nation as the state with the highest percent of population and number of participants in OHV recreation since 2008](#)³. The US OHV market is worth more than \$9 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. Improvements in the Plan Revision bear the potential to minimize user conflicts and potential resource damage while providing sufficient recreation access to public lands for all forms of recreation, including OHV.

We support any additional comments that encourage the FS to maximize the total acreage for restoration of ENF, resilience, and catastrophic wildfire prevention through implementation of the CFRP. 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 Caldor 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 ENF today is catastrophic wildfire. In California, between 2020 and 2022, over 7 million acres were burned by catastrophic wildfire, including the 227,981 acres that burned in the Caldor 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, portions of ENF were not burned by the Caldor 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 Caldor Fire. We urge ENF to take action now through the CFRP to maximize the scope of the project to address both burned and unburned land within the borders of all land that was impacted by the Caldor Fire. It is more critical now than ever that ENF take action to thin the unburned forest from overly-dense trees and brush to restore healthy balance and improve forest resilience to survive future fires. Additionally, it is vital that ENF incorporate a detailed long-



term forest maintenance plan into the scope of post-CFRP action, to ensure that efforts to restore burned terrain and prevent wildfire in unburned terrain are sustained for perpetuity.

We ask ENF to expand the boundaries of the CFRP to include:

- **Remote back country and designated roadless areas within the burn scar**
- **The full range of ENF 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 ENF contained within the boundaries of the CFRP is a popular area of off-highway vehicle use and dispersed camping. It covers a large area of the 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 CFRP. The FS 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 CFRP. We do not support the post-project decommissioning of any roads that are constructed or improved for the CFRP. NEPA requires agencies to consider a range of viable alternatives, and the recreation interest in ENF 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 local communities and outdoor recreation organizations like ours if the agency were to decommission roads.

We ask the FS to incorporate analysis of impact on OHV, camping, and other outdoor recreation as a component of the final project plan.

Additionally, a significant volume of OHV roads, improved campsites, and dispersed camping areas have been closed and decommissioned by ENF over the course of the last several decades. While these historical closures occurred for a variety of reasons, it is pertinent for ENF to thoroughly evaluate the impact of those closures in relationship to the scale of destruction inflicted by the Caldor 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 FS to include an itemized inventory of OHV roads, improved campsites, and dispersed camping areas that fall within ENF that have been closed and/or decommissioned from 1980 to the present date. We further ask the FS to incorporate restoration of those OHV roads, campsites, and dispersed camping into the scope of plan for the CFRP.



To support efforts to develop a full inventory, Cal4Wheel offers volunteers through membership to survey and itemize the terrain across the Caldor Fire burn scar as well as the full ENF.

Additionally, to support restoration efforts now, and long-term maintenance in the future, Cal4Wheel offers support through membership volunteers. Cal4Wheel takes pride in a long 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 ENF to consider this tangible offer of support as part of the resources available to ensure the success of the CFRP and post-project maintenance.

Users with Disabilities

We recommend that the FS use this CFRP to finally begin to reverse its decades-long systematic discrimination against those with mobility-impairment-related disabilities. The FS 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 \(EO13985\)”](#)⁴. 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 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 FS to advance equity in public access to ENF by removing policies that discriminate against those with disabilities.

For the CFRP, we ask that the FS 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 ENF 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 FS management policies generally, and within the scope of impact for the CFRP specifically. The negative economic impact from the Caldor Fire was massive for El Dorado County. The Caldor Fire created especially difficult hardship for the foothill and mountain communities in and near ENF. Restoration of land within the Caldor Fire burn scar, as well as fuel reduction and vegetation management to prevent future incidents of catastrophic wildfire in ENF, bear great potential to rebuild and revitalize this sector of the economy and local 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](#)⁵. 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 FS to seriously, carefully, and thoroughly evaluate socioeconomic impacts when considering the scope of implementation for the CFRP.

The FS carries the weight of responsibility for potential negative socioeconomic impacts that would be caused by negligence to implement broad-scale fuel reduction and habitat restoration, as the FS also carries the responsibility of managing public lands within ENF. There are many private citizens who, as residents, business owners, and outdoor recreationists within ENF boundaries, have advocated for many years to request that ENF 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 ENF if it were permissible for private citizens to do so. Whereas ENF is FS managed land, the FS bears responsibility for vegetation management and bars private citizens from implementing such projects independently. At this point in time, with the Caldor Fire as an incident of hindsight for us to reflect on, it is abundantly clear that lack of effective vegetation management within ENF by the FS was a massive contributing factor to the scale of destruction that the Caldor Fire inflicted on over 227,000 acres of public and private land in El Dorado County. With widespread understanding of the value and critical need for effective vegetation management within ENF, a choice to continue previous vegetation management practices and NOT implement significantly expanded fuel reduction measures for catastrophic wildfire prevention, could be assessed as an act of intentional or gross negligence by the FS – negligence that bears immediate, persistent, and severe socioeconomic hardship on the citizens of El Dorado County.

Of equal importance to assessing the socioeconomic loss from catastrophic fire, is assessment of socioeconomic gain through implementation of fuel reduction and vegetation management projects that would restore ENF to greater resilience to future fire incidents. The unburned landscape within ENF 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 ENF 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](#)⁶ 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 federally managed forest lands for over 30 consecutive years. As noted in an [article](#)⁷ 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](#)⁸ 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 ENF through growth in jobs and commerce. Forestry and outdoor recreation represent vital components of the economy in the communities that are local to ENF. [In 2020, national GDP from the outdoor recreation industry produced \\$374 billion](#)⁹. 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](#)¹⁰. 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 ENF to be robust within the scope of the CFRP 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 CFRP. Northern California boasts one of the largest networks of OHV routes in the state, with thousands of miles of OHV roads contained within ENF. This network of OHV roads and trails serves as a major draw for OHV enthusiasts from across California and the US to visit ENF 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 FS motto, “Caring for the Land and Serving People,” it is critical for ENF to prioritize preservation, restoration, and maintenance of OHV roads and trails as part of the scope of the CFRP in order to help local communities rebuild through economic growth and stability.

Expedited Implementation

We appreciate that FS staff understands the imperative for swift action in order for the proposed CFRP to be effective in restoring burned landscape and improving resilience to catastrophic wildfire across ENF. Page 2 of the Proposed Action states:

“Due to the critical and time-sensitive nature of the proposed actions, the Responsible Official is considering whether to seek an emergency authority to expedite implementation of all or portions of this project. While we recognize that expediting implementation reduces one last opportunity



for formal public involvement prior to a final decision, we are also aware of the urgency to implement some or all of these actions starting in spring 2024. Our intent is to focus use of these authorities on the most urgent actions in the highest-priority areas while allowing for public input prior to final decisions and implementation.”

As FS staff are aware, the timing for forest restoration following a high-severity burn from catastrophic wildfire like the Caldor Fire is of critical importance. The greater the length of time that passes between high-severity burn and the point in time in which restoration of the landscape begins, the greater the likelihood that the burned land will shift to permanent brush wherein the potential to effectively replant large conifers and mixed conifer habitat that will naturally expand and thrive is significantly diminished with the passage of time. There is a narrow window of roughly 5-7 years in which restoration must be implemented, or the risk of turning the land to permanent brush can no longer be mitigated. The Caldor Fire occurred in 2021. Two years have already passed as we are now in 2023, and thus there is already a need for immediate action. Large-scale restoration projects like the CFRP will by necessity, take many years to implement. It is of utmost importance that the FS initiate restoration efforts as quickly as possible.

Cal4Wheel fully supports, and urges, the FS to move forward with seeking emergency authorization to expedite implementation of all portions of this project.

Closing

We would like to close by acknowledging that the CFRP presents ENF with an important opportunity to positively impact not only the restoration of the forest, but also revitalization of communities, local economies, public safety and access to public lands. Effective implementation of this project will not only serve to restore the forest to a healthy and flourishing landscape, 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 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:

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

Sincerely,

Rose Winn
Natural Resources Consultant
California Four Wheel Drive Association



References

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