



California Four Wheel Drive Association, Inc.

Over 55 years advocating for recreation

September 25, 2019

Plan Revision Team Lead
323 Club Drive
Vallejo CA 94592

Subject: Sequoia and Sierra Forest Plan Revision Update

Dear Planning Team:

These comments are submitted on behalf of the California Four Wheel Drive Association (Cal4Wheel) and its membership. Cal4Wheel represents clubs and individuals within the state of California that are part of the community of four-wheel drive enthusiasts. These comments are directed to the *Revised Draft Environmental Impact Statement (DEIS) for Revision of the Sequoia and Sierra National Forests Land Management Plans*. This document shall not supplant the rights of other Cal4Wheel agents and organizational or individual members from submitting their own comments and the agency should consider and appropriately respond to all comments received to this proposed planning project.

While the main focus of Cal4Wheel is to protect, promote, and provide for motorized recreation opportunities on public and private lands, many of our members participate in multiple forms of recreation; including but not limited to hunting, fishing, camping, hiking, horseback riding, bicycle riding, and gem and mineral collection.

We recognize the positive health and social benefits that can be achieved through outdoor activities. We also recognize that motorized recreation provides the small business owners in the local communities a significant financial stimulus. And, our members are directly affected by management decisions concerning public land use.

Our members subscribe to the concepts of: 1) public access to public lands for their children and grandchildren; 2) condition and safety of the environment; and 3) sharing our natural heritage. The general public desires access to public lands now and for future generations. Limiting access today deprives our children the opportunity to view the many natural wonders of public lands. The general public is deeply concerned about the condition of the environment and personal safety. They desire wildlife available for viewing and scenic vistas to enjoy. They also want to feel safe while enjoying these natural wonders. Lastly, the public desires to share the natural heritage with friends and family today as well as in the future. How can our children learn

and appreciate our natural heritage when native species are allowed to deteriorate and historic routes are routinely blocked or eradicated from existence?

Cal4Wheel supports the concept of managed recreation and believes it is prudent and appropriate management to identify areas where off-highway vehicle 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 growth in visitors to public lands. Improvements in the planning processes help minimize conflicts and potential resource damage while providing for recreation access to public lands.

Cal4Wheel supports responsible recreation and encourages individual environmental stewardship. Cal4Wheel has members who recreate throughout the Early Adopter Forests within "multiple use" public lands, and within recommended wilderness and/or inventoried roadless areas via motorized/mechanized means of transport. These members have enjoyed all such means of access in the past and have concrete, future plans to continue such access in the future.

Cal4Wheel appreciates the agency's desire to inform the public as to how the Forest Plan Revision process for the Sierra and Sequoia National Forests might impact fire related vegetative treatments, provide sustainable wood products for local timber or biomass businesses, and enhance recreational opportunity.

Cal4Wheel has reviewed the DEIS and believes that Alternative B provides the foundation upon which to create a suitable alternative that will help the agency meet the Purpose and Need for the Land Management Plan Update.

Alternative B integrates consideration of recreation opportunity, scenic character and scenic character stability into restoration desired conditions and design criteria with consideration of recreation opportunities and settings due to the increased pace and scale of restoration.

Integration of scenic character and scenic character stability into restoration desired conditions and design criteria should not morph into giving credence to the "view shed" concept and requiring buffers around wilderness to protect the "view".

Scenic character and scenic character stability are arbitrary terms that require a clarification of intent. For example, if you are at the forest boundary looking in, that is one perspective of scenic character and scenic character stability. If you are inside the forest boundary looking out, that is another perspective of scenic character and scenic character stability. This concept is closely linked to air quality and PM standards to address the "haze" that appears over the mountains.

Careful consideration is necessary to determine the visual qualities that could impact scenic character and scenic character stability are factors that are within the sphere of influence for the Forest Plan Revision to directly or indirectly impact with a management guideline of management prescription.

Cal4Wheel appreciates agency recognition of the importance of partnerships and encourages more partnerships to support recreation opportunities. We find that, while reasonable, Alternative B is woefully lacking in clarity of definition of the Recreation Opportunity Spectrum and accompanying Recreation Management Area (RMA) framework. Specific issues are listed below.

Issue One – Wild and Scenic Rivers

Cal4Wheel understands the National Wild and Scenic Rivers System was created by Congress in 1968 to preserve certain rivers with outstanding natural, cultural and recreational values in a free-flowing condition for the enjoyment of present and future generations. The Wild and Scenic Rivers Act establishing the system is notable for safeguarding the special character of these rivers, while recognizing the potential for their appropriate use and development. It encourages river management that crosses political boundaries and promotes public participation in developing goals for river protection.

Cal4Wheel also understands the Forest Service 2012 Planning Rule specifically requires that during plan development or revision, river eligibility must be identified unless an inventory has been completed and no changed circumstances or new information warrant further review. The rule also requires the Forest Service to manage those eligible and suitable rivers to protect the values that support their inclusion in the National Wild and Scenic River System until Congress makes a final determination on their designation

Cal4Wheel commends the agency for their effort to identify motorized recreation in the screening process in regard to recommending a wild vs. scenic vs. recreation classification for a river course or segment. Cal4Wheel urges the agency to further refine the classification process based on input from local user groups and individuals as it relates to motorized recreation on roads and trails within the river's sphere of influence.

While the agency has noted that motorized recreation was considered in the screening process, there is no current travel management plan to be used for comparison. This is especially problematic within the Sequoia NF (Piute Mountains region) where travel management has languished since 2009 with no action. The lack of a completed travel management plan puts in question the validity of recommendation for Wild and Scenic River classification and an implied negative impact declaration.

Cal4Wheel is concerned about the apparent management direction in agency actions to use a "Wild" or "Scenic" designation to ban or severely restrict both OHV and OSV recreation within, or adjacent to, the river corridor. In fact, OSV recreation does not appear to be included in the screening process for any of the rivers in the project area(s). We urge the agency to rectify this oversight.

Additionally, the three categories of wild and scenic rivers have accompanying management prescriptions. Of concern to Cal4Wheel is the process where Wild and Scenic - Wild segments are proposed that are downstream from areas with other designated uses. At issue is that WS-Wild segments are to be managed to maintain certain standards. If, for example, an activity

occurring upstream were to cause degradation where the required standard would not be attained, that activity upstream would be restricted. This has the effect of providing limitations by administrative actions on activities that would otherwise be allowed without a site-specific analysis.

We also request full transparency in the WSRA evaluation process, including discussion of segments deemed ineligible. Cal4Wheel has participated in processes where certain segments, originally deemed ineligible, were thrust to the forefront of the designation process only at the eleventh hour, such as through an effort to resolve objections. This approach has, in our opinion, violated notice and disclosure requirements of WSRA, NEPA, and other law.

Cal4Wheel also requests that due consideration be provided for adjacent land uses, including upstream and downstream. Cal4Wheel recommends that the least restrictive recommendation be provided when historical use would be adversely impacted.

Cal4Wheel is concerned about potential impacts to existing and future OHV/OSV opportunities that could or would be impacted by wild and scenic river designations and their associated non-motorized buffers.

Solution: Ground-truth said proposals for potential impacts to OSV/OHV recreation (or other adjacent lands prescription which may be in conflict) and either mitigate impacts or withdraw said river segment from the alternative.

Wild and scenic river designations have often resulted in the elimination or reduction of multiples activities on public lands, either directly via changes in agency management resulting from the designation, or indirectly via litigation by third parties. Wild and scenic designations also threaten private ownership, use, and enjoyment of private property because designation provides the Secretary of the Interior broad discretion to condemn lands within Wild and Scenic River corridors. Additional wild and scenic rivers should not be designated under the final plan because such designations have the effect of impairing the multiple use objective.

Issue Two – Pacific Crest Trail

The Draft DEIS text indicates the Pacific Crest Trail (PCT) would be managed as an “area”. As Draft DEIS is “programatic” document that prescribes guidelines, the actions applied to the PCT “area” management appear to be “site-specific” actions which set side-boards that preclude any other options for site-specific project analysis/planning. The major point is designation of a corridor for the PCT. As the PCT management plan (circa 1982) is being updated, the “corridor” issue should not be addressed within the DEIS, as the DEIS is “programatic” and the PCT management plan is “site-specific” project analysis.

Alternative B defines the management area for the Pacific Crest National Scenic Trail (PCT) to be up to one-half mile from the centerline of the trail. Cal4Wheel and other OHV stakeholders recently met with PCT officers and offered our support for a well-managed PCT that offers the hiker a quality backcountry wilderness-like experience as is practical.

Cal4Wheel believes that any management prescription must be based in reality that recognizes the PCT traverses many “non-Wilderness” areas that include OSV, OHV, hunting, fishing, and mountain-biking. In addition, the PCT directly crosses, or crosses in close proximity, many highways, ski areas, private inholdings, and other “non-Wilderness” activities.

Cal4Wheel believes defining a one-half mile from the centerline of the trail corridor is an excessive action as the management of the corridor (area) would adversely impact other recreation and management options. Legislation providing for designation of the national trails system does not include buffers zones. Legislation does provide for designation of a “trail” that is expressly for non-motorized recreation opportunity. As with other designated trails within the Forest Service trail system, no buffers are provided and strict adherence to a 30-foot centerline area with no off-trail travel permitted. That is a reasonable restriction for management of the PCT in order to accommodate multiple use types across the landscape with minimal resource disturbance from redundant, multiple parallel trail segments.

Solution: The Forest should review public comments and internal reviews with field staff and patrol agents to ensure that it designates crossings or enacts management prescriptions that retain the current form and function of the OSV/OHV program. The agency should pursue authority to designate crossings and related management prescriptions related to widths of crossings or corridors to geological or topographical features that make sense and are enforceable.

Issue Three – Non Recreation Project Impacts to Recreation Program

All components of the proposed plan revision are in an inter- and intra-connected environment where changes in one will impact another. The document does not reflect how (or if) mitigation of impacts will be resolved.

The impacts from non-recreation projects often include obliteration of the trail or removal of water control structures such as rolling dips and catch basins. Those soil erosion measures can often cost \$15,000 to \$20,000/mile to install (or replace). Other sections such as at-risk species, water quality, and ecosystems have the same recreation mitigation deficiencies.

The Forest Service should protect and mitigate engineered system trail infrastructure during any pre- or post-fire treatments or in forest health vegetative projects. Those projects should be reviewed as to how they might potentially impact motorized use on designated roads, trails, and areas.

Solution: Cal4Wheel recommends that “trail mitigation” guidelines be added to all non-recreation projects where recreation areas will be impacted.

Issue Four - Zoning

Cal4Wheel believes the Forests should review current non-Wilderness areas that could be reclassified, reopened, or have cherry-stemmed routes designated for connectivity and/or

touring opportunities. Many 1980-1990s-era Forest Plans used non-Wilderness “non-motorized” classifications to restrict or prohibit summer wheeled recreation. In many cases, OHV/OSV was simply not at the table or given substantive consideration during these programmatic planning efforts. In some areas these classifications such as “Near Natural” or “Semi-Primitive Non-Motorized” had the effect of functionally banning OHV/OSV use including designation of cherry-stemmed routes.

The DEIS text indicates that the concept of Recreation Opportunity Spectrum is being used to define the various zones. Within the DEIS, it is not clear as to how the ROS zones were defined and ranked into one of the ROS categories. Within the text of the DEIS, there is confusion with the verbiage of Recreation Opportunity Spectrum and Recreation Management Areas. The public deserves clarity and certainty about how the lands are proposed for recreation management. That clarity and certainty is not evident in any of the alternatives.

Sustainable Recreation and Designated Areas as defined in the recreation opportunity spectrum (Recreation Management Areas) do not account for possible changes in land ownership (or management prescription), to reflect existing management and to consider recommended wilderness areas and eligible wild and scenic rivers. Again, the public deserves clarity and certainty about how the lands are proposed for recreation management. That clarity and certainty is not evident in any of the alternatives.

The agency states there are no designated motorized roads, trails, or areas in the recommended Wilderness proposals. However, the agency offers no maps for review of potential impacts or conflicts with the proposed changes.

As noted, the agency recognizes that motorized recreation was considered in the screening processes. However, there is no current travel management plan to be used for comparison. This is especially problematic within the Sequoia NF (Piute Mountains region) where travel management has languished since 2009 with no action. The lack of a completed travel management plan puts in question the validity of recommendation for Wild and Scenic River classification and an implied negative impact declaration.

As the Draft DEIS is a “programmatic” document, clarity of the ROS (or RMA) and refining the defined zones is critical to the basic need to access the forests for sustainable recreation and provide side-boards for multiple use prescriptions for the forests. An overall review of the maps and the interaction of the various data layers is in order. There are two data layers not included in the package of maps that are important - 1) Recreation facilities and 2) forest transportation layers. Without this data, it is difficult to determine the completeness of the analysis and the validity of the proposed actions.

Without a clear view of all data layers, the ROS (or RMA) defined zones may preclude future activities without proper site-specific analysis.

Solution: Review all GIS data layers for motorized and non-motorized land designations for validity of reflecting conditions on-the-ground. The Forest Plan Revision process is the appropriate planning tool to reclassify lands for managed OHV/OSV recreation and to establish

guidance for future site-specific project level management to address future changes as driven by future events.

Issue Five – Mega-fire Impacts to Recreation and Recreation Infrastructure

Cal4Wheel believes the DEIS has failed to address how it will reduce mega-fires and their substantive impact to recreation and recreation facilities and species and habitat.

The DEIS does not adequately address the severe tree mortality California is currently experiencing due to drought, insects and disease. The dead trees pose a significant threat to public safety and property as well as species and habitat. The final plan should be revised to reflect the true condition of the forest.

The concern is with the multi-faceted including recreation and recreation facilities and species and habitat management along with others. The Forest Service should not curtail permitted recreation or other multiple use activities when managing habitat for included species. Rather, the Forest Service should recognize the significant benefits that other activities bestow upon the habitat of many species. For example, grazing can benefit the California spotted owl by reducing fire fuels and providing access to forest-floor prey, and invasive species management accomplished through grazing benefits species such as the sage grouse or other species. Grazing should be actively promoted as a habitat-improvement tool.

As noted, incomplete GIS data layers and incorporating site-specific decisions into the programmatic document framework (proposed PCT “management area”, proposed Wild and Scenic River segments, and proposed Wilderness areas) provides management prescription options to address mega-fire impacts across the forest.

Solution: A more substantive fuel reduction program must be incorporated that includes both prescribed fire and timber removal.

Issue Six – Wilderness Designation

As the California population grows, residents will seek places away from the urban areas for recreation and renewal. The addition of designated Wilderness areas, Wild and Scenic Rivers, and other special areas within the Sequoia and Sierra National Forests eliminates future opportunity for families to enjoy the multiple use of public lands.

The history of wilderness designation has repeatedly demonstrated that federal land management agencies invariably reduce and restrict access in wilderness areas, despite existing statutory protections intended to protect those access rights. These restrictions in wilderness areas inevitably result in severe revenue loss to impacted ranchers, reduced private property values, and negative economic impacts to nearby rural communities.

Wilderness designation that prevents the economic development of land that has resource value is not preferred. Should the Forest Service choose to move forward with restrictive land

designations, land currently utilized for beneficial multiple uses should be avoided and excluded for restrictive designations.

Solution: Cal4Wheel does not support additional recommendations for inclusion of forest lands into the National Wilderness Preservation System.

Issue 7 - Economic Impact Analysis

The National Forest Management Act (NFMA) provides the statutory framework for management of the National Forest System. NFMA requires each Forest to prepare and revise a Land and Resource Management Plan ("Forest Plan"). 16 U.S.C. § 1604. A Forest Plan lays out broad guidelines to advance numerous goals and objectives, including to "insure consideration of the economic and environmental aspects of various systems of renewable resource management, including the related systems of silviculture and protection of forest resource, to provide for outdoor recreation (including wilderness), range, timber, watershed, wildlife, and fish...."

As noted within the National Environmental Policy Act (NEPA), "...when environmental impacts are considered, these impacts are not limited to the physical environment, but also include impacts to the human environment. The human environment includes the social and economic considerations within the county."

The outdoor recreation industry jointly commissioned the firm of Southwick Associates to conduct a survey of Americans on their spending on outdoor recreation equipment and activities. The partners wanted to determine the economic impact of outdoor recreation. The findings of the survey are summarized in the report: *A Snapshot of The Economic Impact of Outdoor Recreation, June 2012. (see copy included)*

As noted in that study, "*Spending on outdoor recreation is a vital part of the national and western economies. It means jobs and incomes and can be the lifeblood of many rural communities in the West. This snapshot helps highlight the value of this often overlooked sector – one that is not otherwise measured as a traditional pillar of the U.S. economy.*"

The economic impacts of OHV recreation should be compared to the economic value or consumer surplus derived from OHV use for making policy decisions. Consumer surplus is the value of a recreation activity beyond what must be paid to enjoy it. It is an economic measure of an individual's satisfaction after all costs of participation have been paid.

The consumer surplus, also called net willingness-to-pay, is the theoretically preferred measure of net benefits or net economic value (Bergstrom et al., 1990b). Summing individuals' net willingness-to-pay provides a measure of aggregate net benefits to society. Cost-benefit information can help policy makers and managers in making difficult decisions.

Similar types of economic impacts are frequently noted when other activities on public lands are analyzed for their economic verses environmental impact. Recreation is one of those activities that NEPA requires an economic impact to be considered within the decision making process.

The DEIS does not adequately address the benefits of motorized recreation (even non-motorized recreation) and fails to address the NEPA requirement to "...include impacts to the human environment. The human environment includes the social and economic considerations within the county..."

While the DEIS references Recreation Management Areas and/or Recreation Opportunity Spectrum, the included analysis does not adequately address the benefits of motorized recreation (or non motorized recreation) nor are the economic impacts (...impacts to the human environment...) quantified within the DEIS. Additionally, the analysis lacks a comprehensive disclosure of impacts of the proposed actions on recreation along with economic impacts of the overall proposed actions.

Conclusion

Cal4Wheel believes that a Modified Alternative B that addresses our concerns and solutions described above will best serve the public and protect our natural resources for future generations.

The agency terms documents such as the Land Management Plans as "programmatic" in content as they provide for a framework for future management decisions and activities. The future decision and activities are subject to a rigorous analysis process where the agency is required to disclose and analyze the impacts of proposed actions. As such, this current DEIS does include decisions that will limit future management activities; specifically with proposals for PCT area management, additional wilderness, and wild and scenic rivers. The decisions written into this DEIS provide limitations on future site specific actions involving recreation and fire management. Both are deemed by the agency to be priorities, and yet, this document provides restrictions on future decisions concerning them.

Cal4Wheel appreciates this opportunity to be involved in the public planning process on behalf of its members who enjoy recreation in the project areas. Please contact me if you have questions or wish to discuss any aspect of these comments.

Thank-you,



John Stewart
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California Four Wheel Drive Association