



April 24, 2023

Public Comments Processing
Attn: FWS-R8-ES-2022-0166
U.S. Fish and Wildlife Service
MS: PRB / 3W
5275 Leesburg Pike
Falls Church, VA 22041-3803

Re: California Spotted Owl; Threatened Status with Section 4(d) Rule for the Sierra Nevada Distinct Population Segment and Endangered Status for the Coastal-Southern California Distinct Population Segment, FWS-R8-ES-2022-0166

To Whom It May Concern:

California Four Wheel Drive Association (Cal4Wheel) is writing to provide feedback for the U.S. Fish and Wildlife Service (FWS) proposed listing under the Endangered Species Act (ESA) for the California Spotted Owl; Threatened Status with Section 4(d) Rule for the Sierra Nevada Distinct Population Segment (Sierra Nevada Spotted Owl) and Endangered Status for the Coastal-Southern California Distinct Population Segment (Coastal-Southern Spotted Owl). Many of our members and supporters live near and/or recreate in the areas where each population segment of Spotted Owls thrives. This letter of comment shall not supplant the rights of other Cal4Wheel agents, representatives, clubs, or individual members from submitting their own comments; FWS should consider and appropriately respond to all comments received for this Proposed Listing.

Cal4Wheel is a non-profit organization that champions responsible off-highway vehicle (OHV) recreation and encourages a strong conservation ethic and individual stewardship. We advocate for 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 wildlands now and for all generations to come.

Our members use OHVs and other motorized and unmotorized methods to enjoy federally and state managed lands throughout California and the United States, including the areas of public land noted in the proposed rule that contain Spotted Owl habitat. 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 listing 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 support any additional comments that encourage FWS to objectively weigh all points of impact from this proposed listing – not only impact on Spotted Owls, but also, impact on:

- Other species of flora and fauna that reside in the same habitat as Spotted Owls
- The general health and resilience of public lands where Spotted Owls reside
- The real and impending increased risk of catastrophic wildfire if additional restrictions on human activity are imposed on Spotted Owl habitat as a result of approving this proposed listing
- The social and economic welfare of humans who reside, conduct commerce, and recreate within the range of habitat occupied by Spotted Owls
- The accurate, factual impact of various human activities on the health of Spotted Owl habitat and conservation of this species, including but not excluded to OHV recreation
- The imperative for FWS to use the most current, accurate, best available science to clearly demonstrate the need and justification for this proposed listing

We encourage FWS to exercise caution in advancing a decision to approve the listing. We strongly advocate against any decision to advance this proposal without first analyzing the full scope of impact for each bulleted item noted above, as well as each item noted within the following contents of this letter. While the health and welfare of Spotted Owls is indeed important, the health and welfare of all life that shares Spotted Owl habitat is equally important. The stated mission of the FWS is:

"Working with others to conserve, protect, and enhance fish, wildlife, plants and their habitats for the continuing benefit of the American people."

With emphasis on ensuring "continuing benefit of the American people," we strongly urge FWS to make decisions and take action for this Proposed Listing in full alignment with the FWS mission.

The Primary Threat to Spotted Owls: Catastrophic Wildfire

One of the core threats to Spotted Owls as cited in the FWS proposed listing is: catastrophic wildfire. We agree with the FWS assertion that catastrophic wildfire is presently the greatest threat to Spotted Owls based on a plethora of evidence available. In California, between 2020 and 2022, over 7 million acres were burned by catastrophic wildfire. Wildfire of this type decimates the landscape, incinerating full forests and every form of life that resides in it. If one were to overlay a map of Spotted Owl habitat and the millions of acres of California's public lands that are now reduced to mere charcoal and ash, you would quickly see that there is a high level of correlation between the two. One may want to conclude, then, that since a large amount of Spotted Owl habitat has been destroyed by catastrophic wildfire, it is now more imperative than ever to protect the remaining habitat through measures like this proposed listing. On the contrary, though, the implications of this proposed listing could in fact increase the risk of catastrophic wildfire across remaining Spotted Owl habitat that is yet unburned. The real and urgent imperative that must be addressed is to implement every measure available to prevent future incident of



catastrophic wildfire, and thus maximize the opportunity for Spotted Owls to thrive within a healthy ecosystem that is resilient to catastrophic wildfire.

Over the last several decades, natural wildfire has been suppressed and an increased density of trees and underbrush have choked the land. This created the perfect conditions for total destruction by catastrophic wildfire, as we experienced throughout California in 2020, 2021, and 2022. In fact, excess timber has not been effectively removed from federally and state managed lands in California for over 30 consecutive years. As noted in an [article](#)¹ sharing critique of the role of extreme environmentalism as a direct causal factor for catastrophic wildfire in California, from 1960 to 1990, 10.3 billion board feet of timber were removed from public lands 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](#)² 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.

Historically, an immediate and pervasive impact of listing a species as threatened or endangered, is the limitation or cessation of vegetation management activities within the species' habitat. The protections afforded to endangered and threatened species under the Endangered Species Act (ESA) permits FWS to impose restrictions or complete cessation of human activity that is perceived to negatively impact the species. Typically, vegetation management activity is among the first to be restricted or shut down entirely. This includes logging, mechanical thinning, prescribed burning, and cattle grazing. The ESA listing of the California Spotted Owl (prior listing), Sierra Fisher, Mount Graham Red Squirrel, and Foothill Yellow Legged Frog are all illustrations of this pattern of action. We have every reason to expect that if the FWS chooses to approve this new Proposed Listing for California Spotted Owls, that there will be immediate and pervasive restrictions imposed on vegetation management activity across each acre of that land. In fact, this Proposed Listing has been advanced largely by the lobby and lawsuits of the Center for Biological Diversity (CBD) and Sierra Forest Legacy (SFL). [The CBD and SFL explicitly state that a core goal for gaining FWS approval of Endangered Species Act listing for the Spotted Owl is to challenge "harmful" land-management practices on federally managed lands like logging and grazing](#)³. [The CBD and SFL have been actively working to put an end to timber, vegetation, and fuel management across California's public lands for many decades, using the Spotted Owl as a core tactic to achieve this end](#)⁴.

We must ask ourselves then, is the CBD and SFL's mission to stop logging, grazing, and other "harmful land-management practices" an effective means to protect Spotted Owls? When you evaluate the impact that catastrophic wildfire has already had on Spotted Owl habitat, the clear and resounding answer is an obvious **NO**. On the contrary, Spotted Owls face an even greater likelihood of being decimated by this path of action. Additionally, the CBD and SFL's mission is gravely detrimental to all wildlife that shares the habitat of Spotted Owls. Furthermore, the CBD and SFL's mission is detrimental to all humans who reside, conduct commerce, and recreate within areas in and near Spotted Owl habitat. The total sum of lives lost by catastrophic wildfire in California between 2020 and 2022 is vast. As cited previously, wildfire of this type burns so hot and moves so fast that very few animals, birds, and insects have any potential to avoid being incinerated. All forms of wildlife, including endangered and threatened species, were decimated throughout the 7 million acres that were burned in just three years.

How many Spotted Owls were killed or displaced by catastrophic wildfires that scorched over 7 million acres of land in California in just 3 years? The very protections afforded to endangered species through



the ESA ultimately served to ensure the death of those species, along with the death of millions of other wildland creatures, as well as many humans. The severity of impact from forest management policies implemented by the ESA are significant. **We urge the FWS to fully weigh the balance of value of ALL LIFE, and dismiss the imbalanced, narrow, and ultimately highly destructive policies that are pushed by the CBD and SFL and embedded within the structure of the ESA framework.**

When you survey the landscape of the 7 million acres of land that has burned in California over the last three years, you see a moonscape of charcoal and ash. There are few life forms that have any opportunity to thrive in that landscape for many years to come. **We urge the FWS to take action now to reduce the risk of catastrophic wildfire across the remaining forests and foothills where Spotted Owls reside. We urge the FWS to avoid any decision that would serve to restrict or stop effective vegetation management practices, including logging, mechanical thinning, prescribed burns, and grazing. We urge the FWS to prioritize catastrophic wildfire prevention to ensure that effective vegetation management practices may advance and expand, and thus restore Spotted Owl habitat to healthy status that is resilient to catastrophic wildfire.**

To this point, we have noted that the proposed listing states that large-scale high-severity wildfire is the biggest threat to California Spotted Owl; and the FWS has worked with Sierra Pacific Industries and the U.S. Forest Service to develop coordinated, multi-party fire risk reduction efforts that include the removal of brush and select trees that fuel fires in owl habitat. Most of the land inhabited by California Spotted Owls is managed by the Forest Service and Sierra Pacific Industries. Implementation of their fire risk reduction plans could help improve California spotted owl habitat in the coming years. We agree with and support FWS decision to pursue proactive timber and vegetation management in public lands, especially, within habitat for the Spotted Owl. We state our explicit support of all comments that advocate for proactive timber and vegetation management. We likewise urge FWS to include as language within the decision to approve or disapprove this proposed listing, the perspicuous intention to not only preserve, but also expand, logging, mechanical thinning, grazing, and prescribed burn activity across our public lands in California as it is a highly effective - and ecologically symbiotic - means of reducing fire fuels, managing the landscape, and maintaining a healthy density of grasses, brush, and forest understory. A healthy forest that is resilient and resistant to catastrophic wildfire is the best form of suitable habitat for Spotted Owls.

OHV Roads & Trails

The area of public lands contained within the boundaries of Spotted Owl habitat are popular areas for off-highway vehicle (OHV) use. Multiple communities that are economically dependent upon the health of public lands and public access to outdoor recreation, lie inside or within close proximity to Spotted Owl habitat. While the proposed rule states that recreation activities may present a threat to Spotted Owls, there is insufficient data to demonstrate that recreation has had any impact on Spotted Owls whatsoever. The mere fact that recreation areas overlap with Spotted Owl habitat does not substantiate the claim that recreation activities are detrimental to Spotted Owls.

Before designating critical habitat for the Spotted Owl, we ask the FWS to conduct a comprehensive analysis to determine where, how, and to what extent specific recreation activities, including OHV recreation, impact Spotted Owls, if at all.



Other species that share similar habitat to Spotted Owls have already been afforded expansive protection under previous listings as “threatened” or “endangered” throughout the state of California, including the Foothill Yellow Legged Frog (FYLF). As a result, efforts have been put into place to mitigate the perceived, yet thus far unsubstantiated, claim that outdoor recreation negatively impacts the FYLF. One such effort involved the construction of a “frog bridge” within the Sierra National Forest, in an area near Bald Mountain. The purpose of the bridge was to provide frogs with an alternative means to cross an unimproved road that is commonly used for OHV recreation and to access dispersed camping. While this bridge was completed over 10 years ago, a study has not been conducted or published to demonstrate the impact of the bridge on the FYLF population in that area. It would be erroneous to assume that simply because an action has been taken to protect the FYLF from outdoor recreation activity, that the action achieved its intended purpose. Furthermore, it would be erroneous to assume that the action was relevant or needed at all. A significant sum of taxpayer dollars was invested in the construction of this bridge to protect the FYLF from the perceived threat of OHV use and other outdoor recreation. It is irresponsible to justify protection for the FYLF, and other species such as Spotted Owls, when the evidence of actual threat, and outcomes of previous measures to mitigate purported threat, have not been accurately or concretely analyzed.

Before approving this proposed listing and/or designating critical habitat, we ask the FWS to conduct a comprehensive analysis of all previous actions that have been taken to protect Spotted Owls from perceived threat of outdoor recreation activities and define exactly how those efforts have or have not impacted the current status of the Spotted Owl population.

Additionally, a significant volume of OHV roads have been closed and decommissioned in California over the course of the last several decades. While these historical closures occurred for a variety of reasons, one major contributing factor for road closures has been for habitat protection of species that are listed under the ESA as threatened or endangered. With reference again to the greatest threat currently facing Spotted Owls – catastrophic wildfire – it is pertinent for FWS to thoroughly evaluate the impact of those closures in relationship to the scale of destruction inflicted by catastrophic wildfire in Spotted Owl habitat. OHV roads not only serve to provide humans with opportunities to access and enjoy outdoor recreation, but they also function as vital infrastructure for prevention of catastrophic wildfire and support of wildfire fighting efforts.

OHV roads and trails serve as indispensable fuel breaks to prevent and slow the spread of wildfires across the forest landscape, and to provide firefighters with access to quickly deploy into remote areas of the forest when wildfires occur. Within the Bureau of Land Management (BLM) Environmental Assessment for the Williams Hill Recreation State Plan, the BLM accurately stated on pages 24-25 of the [planning document for WHRA](#)⁴, “OHV routes and Staging Areas act as fuel breaks, since the vegetation along them is cleared... Construction of OHV routes and Staging Areas will effectively create new, secondary, permanent fuel breaks... OHV routes also serve to provide vehicle access to [remote] areas in order to suppress wildfires or conduct other resource management activities such as removal of dead or dying trees to reduce fuel load.” Cal4Wheel urges FWS to explicitly state within any decision to approve or disapprove this proposed listing, that current OHV roads and trails will not be closed or decommissioned as a result of activities related to preserving the population status or critical habitat of Spotted Owls. Furthermore, Cal4Wheel urges FWS to explicitly state within the proposed listing decision



that expansion of OHV roads and trails is recommended as a means ensure maintenance of vital infrastructure for wildfire prevention, and access for wildfire suppression.

Before approving this proposed listing and/or designating critical habitat, we ask the FWS to create an itemized inventory of OHV roads that fall within Spotted Owl habitat, then conduct an analysis of each road to determine the actual correlation of threat from OHV use in Spotted Owl habitat versus the real and immediate benefit that OHV roads and trails provide as fuel breaks and firefighter access in wildland areas. Should any impact from OHV recreation surface as viable fact through such investigation and inventory, we urge FWS to work with public land managers and OHV recreation groups including Cal4Wheel to evaluate opportunities for mitigation, including road or trail reroute, if proven necessary and beneficial to the health and vitality of Spotted Owls.

To support efforts to develop a full inventory of OHV roads that fall within Spotted Owl habitat, Cal4Wheel offers volunteers through our membership to survey and itemize the terrain across the areas of habitat that are included in this proposed listing.

Additionally, to support habitat restoration and maintenance efforts for Spotted Owls, Cal4Wheel offers support through membership volunteers. Cal4Wheel takes pride in a deep history of contribution to conservation and stewardship of public lands through club “adoption” for care of specific sites as long-term commitments. We ask FWS to consider this tangible offer of support as part of the resources available to ensure the success and health of Spotted Owls through active conservation. We believe that through active conservation, effective protections may be afforded to Spotted Owls and other wildlife that serve to create balance between the welfare and interests of both wildlife and humans. We believe that this framework serves to fulfill the FWS mission: “Working with others to conserve, protect, and enhance fish, wildlife, plants and their habitats for the continuing benefit of the American people.”

Finally, given the lack of data to demonstrate that OHV recreation bears any negative impact on the viability of Spotted Owls as a species, and the quality and availability of Spotted Owl habitat, **we ask that FWS add to any forthcoming proposed designation of critical habitat a clause to specify OHV recreation as an activity that will not be negatively impacted by an approved listing.** Given the positive correlation between OHV recreation and maintenance of fuel breaks and access for firefighting efforts, **we urge FWS to not only preserve, but also support the expansion of OHV recreational activity across our public lands in California as it is a highly effective means of preventing catastrophic wildfire, managing the landscape, and creating essential access for operations that maintain a healthy density of grasses, brush, and forest understory.**

Flawed Data

The data included in this proposed listing to suggest that the Sierra Spotted Owl and Coastal-Southern Spotted Owl are distinct population segments is highly questionable, at best. [The background within the proposed listing states](#)⁵:

There is some overlap in range between northern spotted owls and the California spotted owl, and interbreeding between the two subspecies occasionally occurs (Haig et al. 2004, p. 690; Barrowclough et al. 2011, pp. 581, 583-586; Miller et al. 2017, pp. 6871, 6875-6877; Hanna et al.



2018, pp. 3947-3948, 3950-3951). *California spotted owls have the lowest genetic diversity among the subspecies compared to northern and Mexican spotted owls, suggesting that the California spotted owl is of more recent origin than the other spotted owl subspecies or that populations of the California spotted owl are much smaller than the northern and Mexican spotted owl populations (Barrowclough et al. 1999, pp. 919, 927; Haig et al. 2004, p. 683). Within the California spotted owl, genetic differences between individuals found in the Sierra Nevada and individuals found in mountain ranges throughout southern California suggest limited interbreeding between these two areas (Barrowclough et al. 2005, pp. 1113-1114; Hanna et al. 2018, pp. 3947-3948, 3950). However, these genetic studies are limited by sample size and sampling locations. We are only aware of one study that includes California spotted owls from coastal California; this study shows gene flow between geographically adjacent spotted owl samples, with some evidence of asymmetrical gene flow between California spotted owls in Carmel, California (coastal California), and the Sierra Nevada (Barrowclough et al. 2005, p. 1114).*

The data cited to justify that the Sierra and Coastal-Southern Spotted Owls are distinct populations is riddled with conjecture. Additionally, it is old data, the most recent studies conducted on the genetic differences between Sierra and Coastal-Southern Spotted owls were completed in 2005... which is 18 years ago! It is a mockery of both intelligent humans and the scientific process to label this as "best available science." Furthermore, interbreeding is acknowledged and there is documented evidence of gene flow between Coastal-Southern and Sierra Spotted Owls. The proximity of Spotted Owls is clearly the major determining factor related to interbreeding and gene flow across the purported distinct populations. The proposition that Sierra and Coastal-Southern Spotted Owls are distinct populations is not founded in valid, robust, nor current evidence.

Given the tremendous impact that ESA listings bear on all forms of human activity that touches a listed species range of habitat, it is pertinent to that every detail within the proposed listing, and every iota of data cited to support the listing, is both accurate and current. Additionally, ESA listings and designation of critical habitat directly impact all other forms of wildlife that share habitat with Spotted Owls. It is therefore careless to advance this proposed listing based on data that is contrived through aged, insufficient data and hypothesized conjecture. If this is the "best available science," then the very foundation of justification for this proposal is inherently specious.

We call on the FWS to halt this proposal from advancing any further, and utilize only real data drawn from current, factual, direct observations and analysis of Sierra Spotted Owl and Coastal-Southern Spotted Owl population volume, status, and habitat in order to provide current, accurate data to assess the real condition and forecasted viability of all Spotted Owls, the current status of interbreeding among these hypothetically distinct population segments, and the respective scale and scope of need for both ESA listing and designation of critical habitat.

Omission of Economic Impact Analysis

This proposed listing states:

"We reviewed the available information pertaining to the biological needs of the species and habitat characteristics where this species is located and data that would be needed to perform other required



analyses. A careful assessment of the economic impacts that may occur due to a critical habitat designation is not yet complete, and we are in the process of working with the States and other partners in acquiring the complex information needed to perform that assessment. Because the information sufficient to perform a required analysis of the impacts of the designation is lacking, we conclude that the designation of critical habitat for both the Sierra Nevada DPS and the Coastal-Southern California DPS of the California spotted owl is not determinable at this time. The Act allows the Service an additional year to publish a critical habitat designation that is not determinable at the time of listing (16 U.S.C. 1533(b)(6)(C)(ii))."

The proposed listing acknowledges there is a broad variety of recreation activity throughout the range of habitat of Spotted Owls, yet says nothing about the economic impacts resulting from possible loss of recreation. Since recreation currently and historically co-exists with Spotted Owls throughout California, we urge FWS to adjust the language of the proposed listing decision, whether approved or disapproved, to state that all existing recreation will continue without restrictions.

Recreation, especially [recreation off of paved or gravel roads, is the leading cause of growth in visitors to public lands](#)⁶. 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. 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. ESA listing of Spotted Owls and designation of critical habitat bears the potential to restrict or eliminate user access to vast areas of public land. Such restrictions or closures of access will detrimentally impact local economies that depend on outdoor recreation and recreation tourism, as well as the OHV industry broadly. The negative economic impact of this proposed listing would directly affect millions of Californians who reside in and near the range of habitat of Spotted Owls

There will clearly be massive economic impacts from Spotted Owl ESA listing. Impacts which FWS has neglected to consider and analyze within the proposed listing, including:

- Loss of recreation caused by Spotted Owl related restrictions or lawsuits resulting in loss to the local economy as well as loss of access to public lands
- Reduction or elimination of active management, including logging and fuel reduction, to the detriment of forest health and loss of jobs
- Reduction or elimination of cattle grazing to the detriment of forest health and loss of jobs

We call on FWS to do their due diligence and uphold their responsibilities as decision makers in this proposed listing, by conducting a comprehensive economic analysis that includes evaluation of impacts on OHV recreation specifically, outdoor recreation generally, tourism within local communities that rely on the recreation economy, logging, fuel reduction, and grazing. We assert the imperative that FWS must refrain from issuing a final decision on whether or not to approve the proposed listing for Spotted Owls until after a comprehensive economic analysis has been completed, and, the public has had an opportunity to review said analysis and submit comments on it.



Closing

In closing, we appreciate the opportunity to comment on this proposed listing for California Spotted Owls. We would like to emphasize that the proposal presents the FWS with an important opportunity to positively impact not only the current and future health of Spotted Owls, but also, the health of all wildlife that share habitat with Spotted Owls, and the health and vitality of public lands to serve the benefit of the American people. This proposal provides an opportunity to balance important conservation efforts to help Spotted Owls thrive, while ensuring that an accurate decision is made based on current, accurate, best available scientific and economic data. It provides an opportunity for FWS to take action to prevent catastrophic wildfire, protect outdoor recreation generally and OHV recreation specifically, increase the opportunity for all flora and fauna to thrive in a healthy ecosystem, and provide vested stakeholders such as members of Cal4Wheel with an opportunity to actively contribute to the conservation and stewardship of Spotted Owls.

California Four 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:

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

Sincerely,

Rose Winn
Natural Resource Consultant
California Four Wheel Drive Association

References

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2. United States Department of Agriculture. US Forest Service. Forest Products Cut and Sold from the National Forests and Grasslands. Current Fiscal Year 2023. <https://www.fs.usda.gov/forestmanagement/products/cut-sold/index.shtml>
3. Sierra Forest Legacy. California Spotted Owl. 2023. https://www.sierraforestlegacy.org/FC_SierraNevadaWildlifeRisk/CaliforniaSpottedOwl.php
4. Bureau of Land Management. Draft Williams Hill Off-Highway Vehicle Recreation Plan and Environmental Assessment. 2021. https://eplanning.blm.gov/public_projects/2014037/200487052/20057857/250064039/DOI-BLM-CA-C090-2021-0014-EA-draft.pdf



5. Regulations.gov. Docket (FWS-R8-ES-2022-0166). Proposed Rule: Endangered and Threatened Wildlife and Plants: California Spotted Owl; Endangered Status for the Coastal-Southern California Distinct Population Segment and Threatened Status with Section 4(d) Rule for the Sierra Nevada Distinct Population Segment. February 22, 2023.
<https://www.regulations.gov/document/FWS-R8-ES-2022-0166-0001>
6. Global Market Insights. U.S. Off-Road Vehicles Market Size by Vehicle (ATV, SSV/UTV, Off-Road Motorcycles, Snowmobiles), By Application (Utility, Sports, Recreation, Military), Industry Analysis Report, State Outlook, Growth Potential, Price Trends, Competitive Market Share & Forecast, 2018 – 2024. Published January 2019. <https://www.gminsights.com/industry-analysis/us-off-road-vehicles-market>