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WILDERNESS



**SIERRA  
CLUB**

June 17, 2024

Inyo National Forest  
White Mountain Ranger District,  
Attn: Alex Ertaud  
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*Via project portal and email: [alexander.ertaud@usda.gov](mailto:alexander.ertaud@usda.gov)*

Re: Coyote Flat OHV Recreation Enhancement Project

Friends of the Inyo, on behalf of our over 1,000 members, submits these comments in response to the Inyo National Forest's Draft Environmental Assessment (DEA) for the Coyote Flat Off-Highway Vehicle (OHV) Recreation Enhancement Project. Friends of the Inyo is a grassroots non-profit organization based in Bishop, California. Our mission is to protect and care for the land and water of the Eastern Sierra. Over our 38-year history, we have actively engaged with land and water management agencies in the Eastern Sierra, including the Inyo National Forest.

Californians for Western Wilderness is a citizens group founded to secure protection for the remaining wilderness areas and other public lands in the western United States. The organization works to encourage and facilitate direct citizen democracy through participation in administrative and legislative actions, creating a constituency in California for wilderness across the West.

The Sierra Club represents over 3.8 million members who support getting people outdoors while balancing the needs of wildlife and preserving our natural resources and biodiversity. The fight for social justice is an explicit part of Sierra Club programs and initiatives. The use of public lands and public funds need to take into consideration the many recreational needs of a cross-section of Americans. Trade offs that impinge on our natural resources for recreational benefits must be for a broad group of people. The Range of Light Group (ROLG) within the Toiyabe Chapter of the Sierra Club has over 400 members in the Eastern Sierra.

We appreciate the vision and effort that went into drafting the DEA and the information shared in the public presentations. While the Coyote Flat area offers many recreational opportunities, these lands are also home to valued natural and cultural resources. Recreational uses persistently harm and degrade natural and cultural resources on public lands. Every recreational use has some level of direct, indirect, and/or cumulative environmental impact. Off Road Vehicle use in particular tends to have the most significant negative effects on natural and cultural resources. We support the White Mountain Ranger District re-evaluating road conditions in the Coyote Flat area and seeking to better protect natural and cultural resources while improving recreational opportunities for all users. A proactive approach to management is essential for seeing continued responsible use of this popular recreation area.

## **Comments**

Improving dangerous and otherwise problematic road sections is a wise course of action for public safety, visitor enjoyment, and ecosystem health, given creation of bypasses, turnarounds, and other unauthorized trails. We offer the following comments:

### Monitoring for Protection of Natural and Cultural Resources

We appreciate the initiative taken by the Inyo National Forest (INF) to enhance the route system in the Coyote Flat area, as the poor state of the roads in this already extremely popular multi-use recreation and heavily degraded area are causing further degradation to natural and cultural resources. We would like to express our appreciation for the mitigation measurements developed during the scoping process and suggest that a monitor be assigned to ensure compliance to all measures, not only the non-disturbance of Species of Conservation Concern (SCC). It is of key importance to members of the community that both botanical monitors and cultural monitors must be on site while work is under development to ensure proper handling of mitigation measures and protocols for both natural and cultural/historical resources. Echoing comments expressed at the public presentation on the DEA, given the vast changes to this landscape and the high visitor numbers as OHV use has only grown in popularity in the 21st Century<sup>1</sup>, we advise a highly collaborative process with local tribes to develop culturally sensitive plans and management processes for tribal uses moving forward.

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<sup>1</sup> United States Forest Service, Off-Highway Vehicle Recreation in the United States and its Regions and States: An Update National Report from the National Survey on Recreation and the Environment (NSRE), 2008.

## Revegetation

The DEA notes a positive effect on recreation due to increased accessibility, thus we can reasonably expect an increase in visitation to Coyote Flat due to these necessary improvements. With increased visitation, unauthorized use of previously decommissioned routes is likely, especially without complete disguise and recovery. Revegetation must be prioritized for the restoration of unauthorized trails. While it is true that soil and vegetation are likely to recover eventually after motorized use is discontinued, as stated in the DEA, we recommend full decommissioning of closed routes with restoration activities such as re-seeding, mulching, and de-compacting soil for the quickest recovery of these sites and best disguising of past use as well as discouragement of future use. Trails that are not selected for revegetation efforts and instead are left for natural vegetation recovery should have an accompanying timeline for expected natural vegetative recovery, and, if after a reasonable time period these areas are not observed to have been naturally recovered, other revegetation efforts must be applied.

## Volunteer Stewardship

It is clear based on public participation that there is a desire from members of the OHV community for recognition of their volunteer stewardship work in the Coyote Flat area. We encourage staff members of the White Mountain Ranger District to reach out to these members to formalize future opportunities for engagement and stewardship on public lands. It is clear that there is a small but dedicated user group at Coyote Flat who are keen to see this area maintained and are willing to do the work to do so. Ensuring this work is done consistently with the best practices for road maintenance and habitat protection should be a priority. We appreciate the acknowledgment of the need to further follow up the implementation of the proposed improvements and look forward to seeing proposed OHV management plans for the future. Informational kiosks, guidelines for seasonal use, and establishing entrance gates for wet weather closures are all great ways to further education on best use practices for the public and could assist OHV volunteer groups in connecting and educating community members in the future. While OHV use may account for only around four percent of use in the National Forest System<sup>2</sup>, it is clear that this small user group is growing and education and stewardship should be formalized sooner rather than later.

## Evaluation of Conditions and Maintenance Needs

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<sup>2</sup> United States Forest Service, U.S. Forest Service National Visitor Use Monitoring Survey Results National Summary Report, 2023.

While we understand capacity limitations such as budget and staffing constraints, we believe the current system in which the OHV areas on the Inyo National Forest are evaluated every 5 years to determine conditions and maintenance needs is not enough following this project. Beyond the established every-5-years evaluation schedule for determination of conditions and maintenance needs, a more regular visitation schedule and assessment strategy should be applied during and following the length of this project to assess progress and address potential issues which might naturally arise from development, including, but not limited to, lack of revegetation, unauthorized trail making, spread of invasive plants, soil erosion and soil compaction, etc. An observation schedule, if not already in place internally, should be established for frequent visitations and to make observations on the state of the trails and the efficacy of blocked or otherwise disguised trails. Frequent visitations can allow on-the-ground staff members to immediately place barriers when unauthorized trails are observed to be forming. While resource damage from unauthorized trail making is almost impossible to catch in the moment, further resource damage can be prevented with frequent visitation and swift action. We appreciate the work done to reroute and bypass sensitive areas and, given the work the Forest is committing to in the restoration of unauthorized roads, we stress the development of long term monitoring plans for preventing the development of new unauthorized trails, which are far easier to restore and revegetate if addressed early on before consistent use is established. Unfortunately, as with all forms of recreation, it must also be taken into consideration that certain improvements, such as turnouts for dispersed camping, can also drive increased visitation and once again, increased need for further resources and development. With increased access expected to follow this project, monitoring of invasives and potential spread will be important due to an increase of overall human and vehicle interaction. Ensuring existing roads receive adequate care in order to prevent degradation of both the road structure and surrounding habitat will continue to be of importance.

## **Conclusion**

Thank you for the opportunity to comment on the Coyote Flat OHV Recreation Enhancement Project Draft Environmental Assessment.

Sincerely,



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Executive Director



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