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November 14, 2024

White Mountain Ranger District  
Attn: Blaine Hartman  
798 Main St  
Bishop, CA 93514

*Submitted by email: [blaine.hartman@usda.gov](mailto:blaine.hartman@usda.gov)*

1. Objector:

California Off-Road Vehicle Association  
1500 W El Camino Ave #352  
Sacramento, CA 95833  
916-710-1950

2. Signature:

Amy Granat

3. Lead Objector:

Amy Granat

4. Coyote Flat OHV Recreation Enhancement Project

White Mountain Ranger District  
Inyo National Forest  
Inyo County, California  
Taro Pusina, District Ranger

5. Suggested objections and remedies:

- a. The Final Environmental Assessment ignores comments from the public and comments made by CORVA. The responsible official dismissed the need to conduct an analysis that would assess long-term OHV recreation needs including Coyote Flat. Instead, the forest is proposing to move forward with a project that lacks an understanding of how the forest serves the OHV community, and how Coyote Flat fits into the overall Recreation Opportunity Spectrum for the Inyo National Forest.
  - i. Remedy – conduct a complete analysis into the need for increased OHV access to the Inyo National Forest and remand this decision until it is clear how Coyote Flat fits into a comprehensive OHV recreation plan. It

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is unwise to spend money on a project that may not be needed when a comprehensive OHV plan is developed. Paved roads to higher elevations are unneeded in the Inyo National Forest. While Coyote Flat currently provides a unique recreation experience for off-roaders, the following roads to higher elevation areas already exist to accommodate contemporary urban visitors in the Inyo National Forest:

1. Lake Sabrina
  2. South Lake
  3. North Lake
  4. Whitney Portal
  5. Onion Creek
  6. Big Pine Creek
- b. CORVA's comments on the confusion over maintenance levels were partially addressed, but the corrections on the document are unclear and still do not explain where OHV non-street legal vehicles will have access after the proposed work is completed. OHV enthusiasts deserve a complete understanding of the roads and trails which they will be able to continue to use to access the forest after the proposed project is completed.
- i. Remedy – Define ML 2 and ML 3 road access.
- c. CORVA commented on the lack of alternatives presented in the draft. The response to the comment was unacceptable. Although it may be allowable for a draft EA to contain only 2 alternatives, the no-action alternative and the proposed alternative, it is unwise, and the confusing nature of the document illustrates this clearly. The no-action alternative is preferable to an action that the OHV community does not support and isn't needed.
- i. Remedy – remand the document because further analysis and assessment is needed. The analysis that was conducted was not based on the best available science.
- d. The term "contemporary urban visitor" was removed from the document per CORVA's request; however, the analysis is still geared toward that user group. Although the wording has changed, the analysis that caters solely to that type of visitor remains.
- i. Remedy – remand the document.
- e. CORVA commented on the existence of user-created trails noted in the document. However, the proposed action does not address this issue or analyze user-created routes for possible inclusion to the designated OHV route system. This project could truly enhance OHV Recreation if the White Mountain Ranger District would start over with an analysis that includes the local OHV community and analyzing user-created routes for inclusions into the designated route system.

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i. This analysis must be remanded.

6. Each objection listed above references the comments previously submitted on the Draft Environmental Assessment for the Coyote Flat Off-Highway Vehicle Recreation Enhancement Project by CORVA. This provides the connection between the objections stated above, and the previously submitted comments.

CORVA continues to maintain that this proposal is incorrectly identified. Although it is called an "OHV Enhancement Project", the local OHV community that supplies much of the volunteer labor in the forest disagrees. Motorized access to the higher elevations of the Inyo National Forest is sparse, due to the many Wilderness designations. CORVA has listed the existing designated roads that accommodate the 'contemporary urban visitor' that this analysis is designed to please. Coyote Flat provides a unique opportunity for the OHV enthusiasts who recreate in the Inyo National Forest and this analysis does little if anything to enhance the off-road experience.

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