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Organization: CA Dept of Fish and Wildlife

Title: Environmental Scientist

Comments: August 11, 2022

Andrew Kennedy

District Ranger

US Forest Service, White Mountain Ranger District

789 North Main Street

Bishop, CA, 93514

Subject: Coyote Flat OHV Recreation Enhancement Project

Dear Mr. Kennedy:

The California Department of Fish and Wildlife (CDFW) has reviewed the July 2022 proposal from the US Forest Service (USFS) for the Coyote Flat OHV Recreation Enhancement project (Project). The Project would involve installing culverts, stabilizing cut slopes, and regrading road and trail surfaces, among other activities, for the purpose of refining and developing a sustainable, high quality off-highway vehicle (OHV) system. CDFW is providing comments on the proposal as California's Trustee Agency for fish and wildlife resources, in which those resources are held in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW's primary concern is that the Project will increase public access to mule deer (*Odocoileus hemionus*) habitat. The northern portion of the Goodale mule deer herd occupies the Project area year-round, except during winters of high amounts of snow. In addition, the Project area includes major migration routes that encompass spring and fall transition ranges. Deer from as far south as Birch Creek (southeast of Big Pine, CA) migrate northwest through the Project area as they transition from winter to summer range, spending time at lower elevations in the drainages of Freeman Creek, Shannon Canyon, Onion Creek, Baker Creek, and Big Pine Creek during fall and through spring. Typical migration routes straddle Sugarloaf, Coyote Flat Trailhead, Coyote Ridge and Lookout Mountain, and traverse Coyote Valley Road near the Coyote Creek Flats Trail Fork. While on their summer range, these deer occupy the areas around Mt. Humphreys, Mt. Henry and Pavilion Dome and along the Piute Canyon, westside of the San Joaquin River, and as far north as Florence Lake. When they return to winter range between mid-October and mid-November, these deer migrate through the Project area. Deer will remain along Onion Creek, Baker Creek, and along Baker Creek Stock trail until late November, at which time they migrate to lower elevations and into the Owens Valley.

The reconstruction of the two main roads into the Project area (i.e., Main Rd. to Coyote Flat and Coyote Flat to Piper Peak Rd. as described in the proposed action for Coyote Flat OHV Recreation Enhancement, March 2022) will increase public access to the area. Human encroachment can impact habitat suitability for mule deer in 3 ways: by displacing mule deer through habitat loss, altering the physical characteristics of the habitat and reducing its suitability, and altering deer perception of suitable habitat because of the increase in noise and activity (Cox et al 2009). Increase in public access is associated with more disturbances due to OHV activity, which includes more people and noise in the area, and the opportunity for unauthorized trails. These disturbances are known to deter natural mule deer behavior.

Specific comments and recommendations are as follows:

Reconstruction and/or heavy maintenance of 11.1 miles of roads and motorized trails is identified in the Project and the reconstruction may extend "up to 50' on each side from the road centerline." The Coyote Flat to Piper Peak Rd section in the southeast corner of the Project area that is along Onion Creek will provide increase public use in an area known to hold mule deer prior to migration in the early summer and again in the fall prior to winter. Further reconstruction and/or heavy maintenance of Coyote Flat to Piper Peak Rd is discouraged by CDFW. Along the Main Rd to Coyote Flat section in the north, CDFW recommends minimal disturbance from the intersection of Coyote Valley Road/Coyote Creek Road to the Coyote Creek/Flats Trail Fork. The Project proposes to improve the staging area located on Coyote Valley Road at 7S10 at 37°18' 51.60" N., - 118° 29' 20.09" W. CDFW recommends that this improvement includes the addition of a kiosk with information regarding mule deer habitat and migration and general wildlife information.

The Project proposes to consider the removal of Baker Creek Trail 32E301 (0.7 miles). CDFW concurs with this proposal. This will eliminate excess use in the area, as the main road runs adjacent to this trail and already provides access to the area. Mule deer extensively use the area from Baker Creek to the base of Sugarloaf.

The Project proposes that the Contractor will recommend upgraded measures that would be appropriate for deterring the use of unauthorized routes. The USFS report "Coyote Flat OHV Recreation Enhancement, Final March 2022" lists existing mileage by route type within the Project and reports there are 28.2 miles of unauthorized roads and trails, which comprise nearly 32% of the roads and trails within the Project area. CDFW recommends this Project include that all unauthorized routes will be closed and signage included where appropriate.

The Project proposes the re-route of trail away from Onion Creek (approximately 1 mile). CDFW recommends the re-route of trail and recommends the construction of a 50" motorized trail, rather than the second option of an 8' road. A narrower trail will be less intrusive on the habitat.

CDFW recommends that all Project work that requires heavy equipment or excessive noise ceases from mid-April through 1st of June and from mid-October through mid-November when deer are migrating through the project area.

Finally, CDFW recommends that monitoring of use by OHV is part of the Project and will allow for immediate deterrence of unauthorized trailing.

CDFW appreciates the opportunity to provide comments on this project. Please contact CDFW Wildlife Biologist, Jane McKeever, with questions regarding this letter at jane.mckeever@wildlife.ca.gov or 760-504-5412.

Sincerely,
Heidi Calvert
Regional Manager