Data Submitted (UTC 11): 8/12/2022 7:13:22 PM

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Organization: Valley Outdoors

Title: Chairperson

Comments: Michael Lueders

Valley Outdoors Bishop, California August 12, 2022

RE: Coyote Flat OHV Recreation Enhancement Proposal by USFS

Thank you for your time and consideration in this matter. Coyote Flats has been a jewel of the Sierra for decades. Previously only know to relatively few, recent years have seen exponential growth in use, popularity, and impact. One can simple search YouTube for "Coyote Flats" and see countless videos from worldwide visitors.

This increased use, coupled with decreased budgets for management, has led us partially to where we are today. Any proposed improvements and changes must incorporate an "over the horizon" vision and not just address current conditions or current limitations. Greatly improving the road to allow for unskilled drivers in poorly equipped vehicles, for example, may address today's issues but will greatly increase visitors and impacts in the future.

No single person or entity has all the answers. Many users have many perspectives. I am grateful for the opportunity to participate in this project at such an early stage. I feel many more users would also be as grateful if more had knowledge of the scope of the project. It is my strong recommendation the USFS reaches out to the user groups involved. The people who actually frequent the area to seek firsthand institutional knowledge from them. A meeting on-site via a tour would go along way to inform all involved. Partnering with user groups could also greatly leverage the USFS ability to address, improve and maintain the Coyote Flats that we all love. We are here and waiting.

Regarding the proposed staging area improvements at the intersection of 7S10 and Coyote Valley Road, the de facto public staging area is roughly .5 miles Southwest of Reata, Underwood Road and Coyote valley Road. (37.34206, -118.44262). Although this area is not under USFS management it is where all trailers unload, vehicles meet, and all drivers prep vehicles either prior to going to or just after coming back from Coyote Flats as it is just off the paved road near Bishop. It is at this area an informational Kiosk would be greatly beneficial as literally zero though traffic stops at the current "staging area" on USFS lands. Any facilities at the de facto area would be very easy to access, monitor and maintain. Unlike improvements at the staging area at the intersection of 7S10 and Coyote Valley Road that go unused and unmonitored. Perhaps a partnership with private sector and user groups could facilitate such improvements at the de facto staging area.

Regarding the closure of 31E301, Green Lake Overlook, this road segment and its terminus represents, in my opinion, the upper pinnacle of user experience available to motorized users in the western region of the United States. It is a treasure. It absolutely requires environmental protection, but many methods are available to mitigate impacts and keep users on a designated route though trail markers etc. while still allowing vehicle access. It is my recommendation to work with user groups to develop a strategy to not only keep the segment all the way to the overlook open but preserve to the greatest extent possible the natural wonders.

Regarding the proposed re-route of 32E303 away from Onion creek, moving the roadway to the east. Such substantial work upslope on the moraine would likely cause far more environmental damage than it would address. Attempts at hardening the water crossings and the spring seep (mudhole in USFS documents) have been token at best. With the proper equipment and native materials, a serious improvement could be implemented to address all concerns. Furthermore, benching a new roadway upslope into the unstable moraine would just add approximately one more mile of road hazard typical to the current 500-foot-long section at 37.17635, -118.41803, which is currently problematic and requires attention.

Regarding the historic Salty Peterson Mine Road, UN2194. It has been unclear why this section was ever closed as it provides an effective corridor between existing roads and destinations. This road, with its sun exposure, is

frequently the first to be clear for travel in the spring. I wholeheartedly agree to reopening this historic road section.

Regarding the proposed closure/removal of .7 miles along 32E301. It is unclear in your map or description if this is the older parallel roadway adjacent to 32E301 or not, which crosses Sanger meadows near Cow Creek. I would support the removal of the older and unused, duplicate western section, which is directly adjacent and between the more used 32E301 and Cow Creek as it moves vehicles further from the creek and drainage at 37.18452, -118.44840. It is my sincere recommendation that any and all barriers be of natural stone both for durability and aesthetic reasons.

Regarding previous closures and proposed closures of dead-end spur roads designated as "unauthorized" in your project scoping. These routes are all historic roads and routes developed over the past 100 years of human activity in the Coyote Flats area due to mining, ranching and extensive military operations, including a fully operational military air base. Many of these dead-end spur roads lead to historic camp sites used by many local families for generations as hunting camps. These hunting camps, or dispersed camp sites, are needed now more than ever to alleviate stresses caused by concentrating the ever-increasing campers into specific and fewer areas. It is my recommendation a thorough look at opening these previously closed spur road campsites is implemented due to current conditions and use levels.

Regarding all other road improvements and construction, as all users of the Coyote Flats can attest to, the dramatic increase in vehicles and traffic to the area has taken a toll and much work is needed. It is my deepest wish the creek crossing and environmentally sensitive areas receive thoughtful design to not only achieve the goals but also blend in with native soils and conditions via the use of native materials to improve sections whenever possible. The use of crushed rock, steel cables, milled lumber, concrete block or any other intrusive materials should be limited to the greatest extent as possible. Furthermore, great care must be taken to not "improve" the road system to the point the experience of travel to Coyote Flats is lost forever. Making the area accessible to anything other than high clearance 4 wheel drive vehicles and motorcycles would only exacerbate the already monumental impacts Coyote Flats is experiencing and the "drive to the destination" experience for the user lost.

Sincerely,
Michael Lueders
Valley Outdoors, Recreation for all.