



June 26, 2020

Greater Prescott Trails – Mid-Term 2 Project
Prescott National Forest
344 South Cortez Street
Prescott, AZ 86303

Attn: Susan Johnson

RE: Greater Prescott Trails – Mid-Term 2 Project
Submitted via email to: sajohnson@fs.fed.us
Submitted as written comment to above address

Dear Ms. Johnson:

These comments and concerns on Greater Prescott Trails – Mid-Term 2 Project are submitted by the Yavapai Group Sierra Club Grand Canyon Chapter and Great Old Broads for Wilderness, acting as partners to protect our public lands.

The Sierra Club, founded in 1892, is a national nonprofit organization of approximately 2.7 million members and supporters dedicated to exploring, enjoying, and protecting the wild places of the earth; to practicing and promoting the responsible use of the earth's ecosystems and resources; to educating and enlisting humanity to protect and restore the quality of the natural and human environment; and to using all lawful means to carry out these objectives. Sierra Club's Grand Canyon Chapter was organized in 1965, and, prior to that, our members were also involved in protecting Arizona's resources. We have a significant interest in protecting and restoring the water quality in Arizona's rivers, lakes, and streams. We are also concerned with protecting the health of the forest and wildlife. It is within that context that we are submitting these comments. Sierra Club – Yavapai Group has a long-standing interest in Prescott National Forest. We have participated in the forest planning process. Our 857 local members have long enjoyed the forest for hiking, trail riding, hunting, fishing, wildlife watching, and solitude. We conduct service projects in the forest and our members and volunteers are deeply concerned for the future well-being of our forests.

Great Old Broads for Wilderness is a national non-profit grassroots organization established in 1989. We are advocates, stewards, and educators for the preservation and protection of wilderness and wild lands. Wild places, once destroyed, may be gone forever. (Wild places are those where plants, wildlife, and natural processes function with vitality, biodiversity, and service to the planet.) Broads, through Broadbands across the country, work with agencies in stewardship and monitoring of public lands.

We concur with the Prescott National Forest in their efforts to make trail additions, reroutes and trailheads to the official trail system. We applaud your efforts today, and in the future, to maintain and move forward with trails all in the light of sound environmental and conservation practices - maintaining and restoring the natural ecosystem, for a sustainable future for our wild lands and to retain a majority of our trail system for non-motorized use.

Our comments and objections are outlined below.

RULES FOR TRAIL USERS

It appears that our forest will soon be a huge playground for motorcycles and off-road vehicles! Rules for hikers and motorized vehicle users must be clearly posted. We know that the correct order is horses – hikers/runners – bicycles. Anecdotal evidence tells us we must jump off the trail if a bicycle is bearing down on us. On the trails widened for vehicle use, what is the pecking order? Is it still horse – hiker/runner – bicycle? Does the motorized vehicle/e-bike have to slow down to avoid harming those of us on horseback, or on foot, or on human powered bicycles?

ENVIRONMENTAL ISSUES

Motorized vehicles contribute to:

- Air pollution and resulting climate change.
- Trail damage, including erosion and making donuts off trail around trees.
- Destruction of wildlife habitat.
- Noise pollution that intrudes on the solitude of wild lands
- Contribute to litter because some of these people must be litterers as we don't carry coolers with beer/soda cans, or cigarettes on the trails.
- Illegal fuel wood cutting.
- Destruction of native plants and the spread of non-native species.
- Removal of carbon sequestering trees.

Education

We would like to see more education regarding trail/forest use for all types of users including campers and hunters in the form of trail signs and even articles in local media and on your Facebook page with information about carrying out trash, building and extinguishing campfires, not cutting live trees, camping rules, safety and use of firearms, and what to do if you see an animal behaving oddly in daylight, or one dead.

Event Opportunities.

You talked about potential event opportunities. We hope this does not mean you are encouraging more events and will be closing the forest to the public for motorized events such as motorcycle, OHV's, or race car rallies. In 2016 we were on the Chino District collecting specimens from three sites on the Verde River which were time sensitive, needing to be delivered to a laboratory in Phoenix within four hours. We were stopped for a total of three hours at two road locations because of an automobile race. Our samples were finally delivered to the lab late at night and were no longer valid. This event and road closures were not announced in the newspapers or on the radio. We only saw a sign at "Williams Road" junction, on the east side, and some small paper notices attached to county road signs on adjoining, small, side roads to the Drake and Perkinsville

Roads. We saw cars that had crashed as we made our way back to Chino Valley. In the past we have seen ORV races on the forest that were not only on the unpaved roads, but also traveling in washes and streams. Running events such as the Whiskey Row Marathon do not close the forest to other users.

Trail/Road Closures During Construction

We understand that there will be trails closed for construction. Please publish notice of trail closures and their re-opening to the public. After construction, please install new signage where necessary.

User Monitoring

We suggest that the PNF website have a downloadable/printable form available to trail users upon which they could make trail condition comments or suggestions. A blank form could be taken with you for on the trail notations; and/or upon return, submission to the PNF electronically via your website, email, or regular mail. The City of Prescott has such forms available for use at the Peavine trailheads. They are collected at regular intervals.

Trail Maintenance

We are still concerned that trail maintenance forest-wide has been in a state of benign neglect for over 30 years and we are hopeful that these new projects will rectify this situation. Your statement in the FONSI that “maintenance of newly designed trails verses old poorly designed trails is expected to be significantly less and on average may be around \$500 per mile when averaging out the brushing needs” is optimistic!

E-Bicycles and Gravity Bicycles

We strongly object to e-bicycles being considered non-motorized. E-bikers may not be good physical shape – hence the reason for a motor – and run into trouble in the wild, even with the motor to assist, or when it quits and they have to walk, or be traveling too fast for the trail conditions, and put in jeopardy other trail users.

We would strongly object to gravity biking on any of our trails. National Forests should not be used to make amusement park thrill rides. This type of recreation should be on private land such as ski slopes during the off-season.

IN SUMMARY

You are converting some great hiking and equestrian trails to accommodate more off-road vehicles. Therefore, solitude seekers desiring to experience nature will no longer be hiking on these trails. Motorized vehicles, including e-bikes are not a good way to exercise. We do not feel these people are there to enjoy our wild lands and what they have to offer in the way of solitude, nature, views, birds, and wildlife watching. They are there for the thrill of the ride which probably includes speeding down our trails.

Our greatest concern is safety for all forest users. Bicycle and e-bicycles can be quiet, and hikers/runners and equestrians may not always hear them coming. It is also difficult to hear motorcycles and ATV's.

You must provide signs with trail usage for all motorized vehicles with rules including:

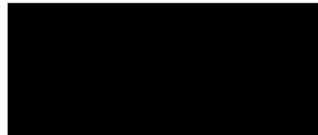
- Speed limits and obeying the speed limits
- Trail etiquette
- Staying on designated roads/trails
- Minimizing wheel spin on switchbacks
- No brake-siding during descents
- No “roosting” around the apex of a turn when climbing
- Slowing down when sight lines are poor
- Crossing streams only at designated fording points
- Not making “donuts” around trees
- Complying with all signs and respecting barriers.
- Consequences of not adhering to any of the above rules

We trust that you will invite all trail users and other community partners to join in trail building, and maintenance and you will conduct monitoring to assure trail sustainability -environmentally, economically, and socially

For the wild, as environmental partners,



Conservation Chair
Yavapai Group Sierra Club Grand Canyon Chapter



Jenny Cobb
Leader Yavapai-Prescott Broadband
Great Old Broads for Wilderness

