



File Code: 1570
Date: August 11, 2020

Thomas Slaback, Conservation Chair
Yavapai Group Sierra Club Grand Canyon Chapter

[REDACTED]

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

[REDACTED]

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dear Mr. Slaback and Ms. Cobb:

On behalf of the Prescott National Forest, I would like to thank you for your involvement in the Greater Prescott Trails Mid-Term 2 Project on the Bradshaw Ranger District. This letter is in response to the objection you filed on the Final Environmental Assessment (EA) and draft Decision Notice (DN). I have read and considered your objection and reviewed the project record and final EA, including the environmental effects. My review of your objection was conducted in accordance with the administrative review procedures found at 36 CFR 218, Subparts A and B.

Beginning in 2008, the Prescott National Forest engaged with individuals, local trail user groups, and various local governments to develop a recreation strategy focused on building and maintaining a sustainable recreation infrastructure. Thank you for being part of that effort. With this decision, the Bradshaw Ranger District proposes to provide additional motorized trail opportunities, trail connections, and reasonable access points, and reduce or limit resource damage and disturbance on the landscape. Trail design will be more sustainable, with less impact on other resources.

The legal notice for the objection filing period was published on May 15, 2020. Your timely objection (Number 20-03-09-0005-O218) was received on June 26, 2020. The regulations at 36 CFR 218 provide for a pre-decisional administrative review process in which the objector provides sufficient narrative description of the project, specific issues related to the project, and suggested remedies that would resolve the objections (36 CFR 218.8). Though we did not meet, the regulations also allow for parties to meet in order to resolve issues. This letter, including instructions to the Responsible Official, is my written response to your objections.

Issues or concerns presented in your objection are summarized and responded to below. You may be addressed as "the objector" in this section.



You are concerned this project will decrease the amount of trail available to non-motorized use; that the majority of the trail system should be retained for non-motorized access. You contend that the project will convert hiking and equestrian trails to accommodate more off-road vehicles, thereby decreasing the opportunity for solitude.

The draft Decision Notice (DN) does not decrease the amount of trail available to non-motorized use. The primary purpose of the project is to provide additional motorized trail opportunities, connections, reasonable access points, and to reduce or limit resource damage and disturbance in the project area [EA, p. 4]. The project deals primarily with motorized trails and does not propose to convert non-motorized trails to motorized trails [DN, p. 1-3; EA, p. 4-6]. Appendix B to the draft DN is a table of actions for implementation that displays the current status of trails and the action that would take place for each section of trail, including decommissioning, new trail development, and any conversion or change in status [DN, p. 17-25]. Motorized trails do not exclude non-motorized uses, though there can be caution needed, as reflected with the implementation of single-track motorcycle trails in the Sevenmile Gulch area. The draft DN notes that these single-track trails will be built and maintained primarily for motorcycles, but will allow other users, such as hikers and bikers (including e-bikes). These trails are not recommended for equestrian users [DN, p. 2].

You contend that this decision does not consider safety in the use of trails in the NFS lands because it does not address the need for trail signage and user education. You also contend that e-bicycles should not be considered to be non-motorized and allowed on non-motorized trails, and you object to gravity biking on any NFS trails.

This draft DN acknowledges the use of e-bicycles on motorized trails [DN, p. 2]. It does not propose the use of e-bikes on non-motorized trails or any proposed change in motorized or non-motorized status of e-bikes. The draft Decision does not propose or consider the use of gravity biking on any NFS trails.

The draft DN addresses signs in the context of safety by signing trail closures [DN, p. 2-3; EA, p. 5, 18] and signs that direct the proper use of gates, especially in relation to cattle [EA, p. 46-47] and safety because of cattle in the area [EA, p. 57].

You are correct that the final EA and draft DN do not include an overarching education component or address common trail signs, beyond safety issues noted as directly applicable to project implementation. The intention to continue engagement with the Prescott Trail Safety Coalition and for education, signs, and maps to include location, trailhead direction and distance, junctions and loops, user education messaging, trail difficulty ratings, and emergency access information is included in the Trail and Wilderness Specialist Report (TWSR) (TWSR, p. 2, 4). This same report includes trail and safety mitigation measures that were not carried into the EA or included as part of the implementation measures in the draft Decision, though they were considered in this resource analysis [TWSR, p. 6-7]. You will find an instruction below that these safety mitigation measures be included as a component of the final decision for the project.

You are opposed to approving the use of NFS roads and trails for motorized commercial events because this closes the forest to other users who may not be participating in or are affected by the event.

The draft Decision Notice does not propose approval of any motorized commercial events. Any proposals for permitted use of NFS lands would go through a permitting process which is outside of this decision. Any consideration of permitting a motorized commercial event or any other event would include whether the proposed activity is within the objectives and desired conditions of the Prescott LRMP.

I have reviewed the project in light of the issues presented in the objection letter received. My review finds that the project is in compliance with all applicable laws and the Prescott National Forest Plan. However, based on my review, I am instructing District Ranger Sarah Clawson to:

- Include the trail and safety mitigation measures that were part of the Trails and Wilderness effects analysis in the implementation measures in the final DN.

I appreciate our continuing discussions and the opportunity to further understand your concerns and explore where we have common interests and goals. The District Ranger may sign the Decision Notice for this project once this instruction has been addressed. My review constitutes the final administrative determination of the Department of Agriculture; no further review from any other Forest Service or Department of Agriculture official of my written response to your objection is available [36 CFR 218.11(b)(2)].

Sincerely,



DALE A DEITER
Forest Supervisor



DN: c=US, o=U.S. Government, ou=Department
of Agriculture, cn=DALE DEITER,
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cc: Sarah Clawson, Kevin Hurrell, Susan Johnson, Jason Williams, Roxanne Turley, Blair Halbrooks