



**BlueRibbon Coalition**  
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**Ben Burr, Executive Director**  
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**October 3, 2024**

U.S. Forest Service  
300 East Highway 260  
Camp Verde, AZ 86322

BlueRibbon Coalition (BRC) is writing to provide feedback for the Black Hills 2 Environmental Assessment Assessment. BRC is a national non-profit organization that champions responsible recreation and encourages a strong conservation ethic and individual stewardship. We champion responsible use of public lands and waters for the benefit of all recreationists by educating and empowering our members to secure, protect, and expand shared outdoor recreation access and use by working collaboratively with natural resource managers and other recreationists. Our members use motorized and non-motorized means of recreation, including OHVs, horses, mountain bikes, snowmobiles, and hiking to enjoy federally managed lands throughout Arizona, including those of the Forest Service. Many of our members and supporters live in Arizona or travel across the country to visit these states and use motorized vehicles to access USFS managed lands throughout Arizona. BRC members visit these areas for motorized recreation, snowmobiling, sightseeing, photography, rockhounding, hunting, wildlife and nature study, camping, observing cultural resources, and other similar pursuits. BRC members and supporters have concrete, definite, and immediate plans to continue such activities in the future.

### **Economic Benefits of Motorized Use**

Local communities rely on motorized recreation for economic opportunities therefore we recommend analyzing adopting the temporary roads into the forest system. The USFS should also be prioritizing maintenance on these roads as they provide access for emergency response teams and act as a natural fire barrier. There has been a surge of use throughout the nation on public lands as well as in the Prescott National Forest. Local groups have worked hard to put the area on the map so that they could reap the economic benefits. Creating more roadless areas will harm economic opportunities. The Bureau of Economic Analysis showed that in 2022 outdoor recreation brought in over \$1 trillion. Many local tour businesses use and access the routes in this area. Closing roads would greatly hinder economic opportunity. Many local organizations and businesses recognize the influx of traffic and believe that any user conflict can be mitigated through better signage and education.

### **Wildfire**

BRC supports the proposed action including mastication. We recommend treating the maximum area possible. Habitat loss is the largest threat to wildlife. One wildfire could cause entire species to go extinct. We support the Forest Service in properly managing the forests to prevent wildfires that could cause harm to wildlife and habitat. However, many conservation groups actively litigate forest projects that help mitigate fires. One of the best things that can be done to protect this wildlife and prevent extinction is to actively manage forests to prevent wildfires. In order to adequately manage the forest roads are a critical component. Roads not only provide access to carry-out forest management projects but also act as a natural fire barrier.

Wilderness and areas with restrictive management without many anthropogenic disturbances are not conducive to wildfire prevention and habitat and species vitality. Wilderness already makes up a large portion of the area. BRC strongly encourages any plan revisions to strongly consider removing any wilderness characteristic areas as well as roadless areas and pursue forest fire mitigation projects that will ultimately help protect the species.

### **Conclusion**

We would like to close by saying we support “shared use”. As long as overall visitation numbers are appropriate for the affected resources, motorized and non-motorized users can be compatible with one another so long as individual users understand designations and plan their activities accordingly. Indeed, motorized and nonmotorized recreation use often overlap as OHV’s often increase accessibility to non-motorized recreational activities such as hiking, camping, equestrian use, etc. We also hold that responsible recreational use of public lands can exist in harmony with ecosystem needs.

BRC would like to be considered an interested public for this project. Information can be sent to the following address and email address:

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Sincerely,

A handwritten signature in dark ink, consisting of stylized initials 'BB' followed by a long horizontal flourish.

Ben Burr  
Executive Director  
BlueRibbon Coalition

A handwritten signature in dark ink, appearing to read 'Simone Griffin' in a cursive script.

Simone Griffin  
Policy Director  
BlueRibbon Coalition