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Ben Burr, Executive Director

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November 19, 2025

Bobbi Filbert, District Ranger

Prescott National Forest
Bradshaw Ranger District
Attn: Bradshaw Vegetation Management 2
344 S Cortez St, Prescott, AZ 86303

BlueRibbon Coalition (BRC) is writing to provide feedback for the Bradshaw Vegetation Management Project. 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, and hiking to enjoy federally managed lands throughout the United States, including those of the Prescott National Forest. BRC members visit this national forest 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.

Active Vegetation Management and Forest Health

We understand that the project area covers some 65,575 acres (the same as the 2013

Bradshaw Vegetation Management EA) and that the proposed activities include a combination of prescribed fire, pile burning, broadcast burning, mastication or other mechanical treatments of surface and ladder fuels, and vegetation improvements.

BRC supports use of such treatments on the Prescott National Forest because healthy, resilient forest structure is critical for reducing wildfire hazard, protecting recreation access for off-highway vehicle (OHV), motorized and non-motorized users, sustaining ecosystem benefits (including clean water and recreation), and improving access for resource users. We encourage the Forest Service to maximize the acreage treated, optimize connectivity of treatment units, and coordinate with partners (including motorized recreation interests) to maintain or enhance access, where consistent with ecological objectives.

We urge the Forest Service to pursue the most aggressive vegetation treatment options available within this project. Vegetation treatments that reduce wildfire risk and improve forest resilience may temporarily affect visual resources but will have far greater long-term ecological and safety benefits.

Section 40806 of the Bipartisan Infrastructure Law directs the reduction of hazardous fuels near infrastructure such as roads and trails. The Bradshaw Vegetation Management Project is an ideal candidate for these proactive treatments. The agency should integrate road and vegetation management to create defensible space and reduce catastrophic fire risk while maintaining recreation access.

Endangered Species Act

Recent final regulations under the ESA (administered by the U.S. Fish and Wildlife Service (FWS) and the National Oceanic and Atmospheric Administration Fisheries (NOAA Fisheries)) revise the procedures for listing, delisting, reclassification of species and designation of critical habitat (Section 4), and for interagency consultation (Section 7). The March 28, 2024 final rules clarified standards and improved clarity for listing decisions and critical habitat designations. It reinstates the so-called “blanket rule” under Section 4(d) for threatened species, allowing FWS more flexibility in tailoring protections. The regulations emphasize best-available science and improved interagency cooperation in Section 7 consultations.

Given the scale of this project and the array of vegetation and fuel treatments proposed, BRC urges that the Forest Service ensure full compliance with the ESA implementing regulations. In the interest of recreation access and motorized user engagement, BRC encourages the Forest Service to work with recreation interests and motorized user groups to coordinate species-habitat protections with management of access, trail use, and post-treatment site rehabilitation. The new regulations provide opportunities for coordinated use. Given that

fuels-management treatments may create altered conditions in habitat, the Forest Service should document how treatments advance desired conditions for ecosystem resilience (which in turn support species recovery) and should monitor and report outcomes, consistent with both the ESA and the agency's forest plan monitoring requirements.

Applicable Laws, EO's and SO's

Federal policy now emphasizes the expansion of recreation opportunities. The EXPLORE Act requires agencies to expand outdoor recreation—including motorized access—and directs them to plan for growth, not reduction, of recreation use. Any reliance on outdated or rescinded climate directives would be inconsistent with current law and Executive Orders. For this reason, USFS should have analyzed an additional alternative to keep these miles of roads open.

Recent Executive and Secretarial directives strongly reinforce the importance of approving and aggressively implementing landscape-scale fuels treatments like those proposed in this project. Executive Order 14072 ("Strengthening the Nation's Forests, Communities, and Local Economies") directs federal land managers to advance climate-resilient forest conditions, prioritize ecological health, and actively reduce wildfire risks through strategic vegetation treatments. It recognizes that high-severity wildfires are a direct threat to ecological integrity, rural communities, and recreation access—mandating that agencies use all available tools to address over-dense stand conditions. These mandates, together with long-standing EO directives on wildfire mitigation, restoration, and infrastructure coordination, affirm that delaying or minimizing necessary fuels treatments is inconsistent with national policy direction.

Complementing these directives, the Department of Agriculture has issued Secretarial Orders that specifically instruct the Forest Service to increase the scale and pace of hazardous-fuels reduction and forest-health interventions. Orders such as USDA Secretarial Order 1077 and follow-on wildfire-crisis initiatives call for "treating more acres, more quickly, and more strategically," emphasizing cross-boundary projects, expanded mechanical thinning, proactive prescribed fire, and flexible access strategies necessary for effective implementation. These directives make clear that the Forest Service is expected not only to authorize projects like this one, but also to design them to capture the full extent of treatment opportunities available within the landscape, even when additional access, temporary roads, or inter-unit coordination are required. In short, the governing Executive and Secretarial mandates urge the agency to approve this project and to structure it in a way that maximizes treatment acreage, reduces long-term wildfire risk, and accelerates the transition to healthier, more resilient forest conditions.

Inventoried Roadless Areas

The exclusion of inventoried roadless areas (IRAs) from this project is a serious flaw that undermines the effectiveness of the entire proposal. The Roadless Rule has never prohibited the Forest Service from conducting fuels reduction, prescribed burning, or non-commercial thinning within IRAs, meaning these acres *could and should* have been analyzed as part of the treatment landscape. These areas often contain some of the most overstocked, high-risk fuels conditions on the forest, and leaving them untouched creates dangerous gaps that expose adjacent units, watersheds, and communities to heightened wildfire threats. Moreover, USDA has already signaled its intention to rescind or substantially revise the Roadless Rule, which means the agency will soon have even greater flexibility to treat these lands—making it essential that NEPA analysis include them now rather than delaying action for years. For the project to achieve its stated purpose of reducing wildfire risk at a meaningful scale, IRAs must be incorporated into the analysis and considered for appropriate restoration treatments.

Roads and Infrastructure

BRC supports the maintenance and repair of system roads. BRC also recognizes the need for temporary roads to complete the proposed project. However, because these roads would be created along the current footprint of previous roads the USFS should at least analyze adopting these temporary roads into the forest road system permanently. Additional routes would be compliant with current administrative priorities, EO's and SO's. Road maintenance and classification actions should maximize the number of roads available for recreation, management, and fire suppression.

We oppose the proposed removal of any roads from the Forest Service road system. There should be no road decommissioning as a result of this project as this would directly undermine the agency's ability to perform vegetation treatments, conduct fuel reduction, respond to wildfires, and manage recreation. As outlined in numerous USDA analyses, road access is critical for forest health, wildfire suppression, and emergency response. Removing access only increases long-term costs and risk.

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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P.O. Box 5449
Pocatello, ID 83202
brmedia@sharetrails.org

Sincerely,

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

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