

Dennis Dailey
Wilderness Services
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A Review of the: **National Trail Classification System**
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The trails classification system remains largely unchanged since my initial review in July 2003. The minor modifications that took place after BCHA representatives and our attorney met with Forest Service officials in October 2004 have been changed back to the way they originally appeared negating any progress made through our previous negotiations. This information is provided to help backcountry horsemen understand the implications of the proposed change. I will also submit a draft of comments to the Forest Service for the consideration of BCHA Executive Committee by August 8th as agreed.

Background: The Federal Register release states that the three category classification for NFS trails was initiated in 1991. A three category classification – primary, secondary and way – is found in trail handbooks as early as 1935. The effort which culminated in the 1991 revision was initiated in 1983 when WO trails program leader Tom Lennon assembled a group of regional trails managers and WO engineers and recreation leaders at a resort in Colorado. I was Region 4’s representative on that committee. The classification system identified in the 1991 handbook, based on difficulty levels, was intended as a change **in name only**, and was determined to be necessary to make the trail classification more user friendly. The standards or design guides for mainline, secondary, and way, were intended to apply to their respective new difficulty classes – easy, more difficult and most difficult. The statement in the Federal Register that the original trail classes did not correlate with difficulty levels is not correct, or at least it is not consistent with the intent of the trail managers that proposed the change in 1983. Adapting trail classes to Recreation Opportunity Spectrum classes was also considered at the workshop in 1983 and was not adopted because of the concern that managing trails as strictly a recreation facility would conflict with the transportation function and the need to provide reasonable access throughout Forest System lands irrespective of ROS class.

The proposed classification system will change standards for pack and saddle stock trails that evolved over, and have been time tested for, nearly a hundred years. The multiple purpose trail evolved within the Forest Service as a necessity to provide “(a) safe and unobstructed passage of loaded animals and foot travelers at a walking gait and in single file; (b) durability designed to meet expected use and liability of damage from natural causes.” (Forest Trail Handbook, 1935). The handbook set explicit standards for Forest Service crews and CCC crews of the 1930s and WPA crews of the 1950s. As the agency evolved, it recognized that not all trails needed to be constructed to the same standard. A classification system was devised around the primary transportation function each trail provided. Primary or mainline trails provided access across and through a major Forest block (analogous to an Interstate highway); a secondary system provided access to major locations within each Forest; and ways provided access to lesser used locations. The trail system was constructed by stock assisted crews for travel with saddle and pack stock. Although way trails received less emphasis, they were still constructed in a manner that provided a measure of resource protection and safety for the types of users they were designed to accommodate.

The proposed revision views trails in an entirely different manner -- as a recreational facility. Trail design parameters and maintenance cycles are related to desired recreation experiences or ‘recreation environs’ ranging from primitive to a rural or urban setting. Trails are not just a recreational facility, however, they are an integral part of a Forest's transportation system and may serve many functions and there isn't a clear and consistent linkage between trail class and the recreation opportunity class through which it passes. A recently retired Forest Service trails expert made that point quite effectively with an analogy that, if there were an effective linkage, US 2, which separates Glacier National Park and the Great Bear Wilderness would be, at best, a two lane gravel road. As a transportation facility, the trail system provided access to users with differing access methods and skill levels. Viewing trails as a recreation facility providing a specific type of experience will result in traditional stock users being denied access to areas that have historically been available to them.

Discussion: The new classification system parallels the Recreation Opportunity Planning process. The Recreation Opportunity Planning process or Recreation Opportunity Spectrum has been a recognized recreation planning tool within the agency since the 1970s. Wildland recreation opportunities are aligned on a spectrum with primitive at one end.

Primitive	Semi-Primitive	Roaded Natural	Rural	Urban
	Non-Motorized	Motorized		
		Appearing		

Wilderness is commonly considered to lie at the primitive end of the spectrum. Hendee, Stankey and Lucas in their book "Wilderness Management" (and a similar pamphlet published by the Forest Service) included as a primary principle in managing wilderness the statement; "Manage wilderness as one extreme on the environmental spectrum..." Although the recreation planning concept evolved independently of wilderness legislation and subsequent to the Act, it has been adapted as a Wilderness planning tool (WROS – Wilderness Recreation Opportunity Spectrum). The National Forests are zoned for recreational purposes according to the degree of modification, amount of use and management presence. Wilderness lies primarily in the primitive class with the more heavily used areas being classed as semi-primitive. In the more heavily used wildernesses, use and related management actions near portals and in some of the popular destinations exceed levels appropriate in semi-primitive settings. In these cases, managers have identified these heavily used areas as 'transition' areas to avoid the confusion of having an area managed as 'roaded natural appearing' within wilderness. Even in heavily used wildernesses, the majority of the acreage falls into a primitive class, and in the moderately used wildernesses of the inter-mountain west, the entire wildernesses (with the possible exception of a small area near popular trailheads) might, according to the criteria in the ROS planning guide, qualify as primitive.

The new trail classification system aligns trail classes to achieve experiences that the agency has interpreted as appropriate within each ROS class:

Primitive	Semi-Primitive		Roaded Natural	Rural	Urban
	Non-Motorized	Motorized	Appearing		
Trail Class 1	Trail Class 2	Trail Class 3	Trail Class 4	Trail Class 5	

Trail Class 1 is titled minimal/undeveloped and the proposed classification guide lists it as appropriate in the primitive recreation environ; Trail Class 2 is considered to be typically found in the primitive to semi primitive environ; Trail Class 3 is appropriate in the semi primitive to roaded natural setting; Trail Class 4 in the Roaded Natural to Rural setting (the trail class matrix lists it as rarely being present in Wilderness); and Trail Class 5 is associated with Visitor Centers or high use recreation sites (not present in Wilderness and not designed or actively managed for equestrians). Based on the new classification scheme and accepted wilderness management principles that state that wilderness should be managed to provide recreation opportunities at the primitive end of the spectrum, one must assume that much of the wilderness trail system will be classified as minimal/undeveloped or Trail Class 1, and TC4 will be extremely uncommon in Wilderness.

According to the proposed design parameters, Trail Class 1 is not designed or actively managed for equestrians, although, by definition, "use may be accepted." This latter comment appears to be more an appeasement or legal strategy than an actual accommodation -- the design parameters (clearing width and height) for TC1 are simply not sufficient to accommodate stock use. Saying that stock "use may be accepted" on a TC1 trail is analogous to locking a man in a room with bars on the door spaced 6 inches apart and telling him he's free to go whenever he wants. A TC1 clearing height of 6' and width "sufficient to define trail corridor" (presumably less than the 24" parameter for a hiker in TC2) would limit stock use to a very short person on an extremely small horse. It is conceivable that TC1 trails in grassland or desert areas without significant trees or woody vegetation might accommodate equestrians, but, since the trails are not designed to a standard which would accommodate the use, it would ultimately result in excessive resource damage and stock use restrictions or complete prohibition.

Except in fairly rare instances, all Forest Service trails were originally designed to standards that would accommodate equines. Mainline (easiest) trails were considered a full pack and saddle stock standard designed to accommodate loaded pack string with minimal resource impact – 8' clearing width and 10' clearing height. They were common throughout backcountry and in western wildernesses up through the 1990s and comprised up to or more than a third of the entire system. At the other end of the spectrum, many way trails historically evolved as shortcuts used by packers returning from lookouts and work camps after unloading their freight. The standard for Way (Most Difficult) trails was a clearing width of 3 to 4' and a clearing height of 8'. Although this is recognizably inadequate for packed animals, it would accommodate a saddle animal and rider, and, over the last century, an awful lot of hunters have used way trails to pack out game. One can assume that all or a portion of the way system will be reclassified as TC1, and as they become logged in over time, they will be inaccessible to stock users. Without saying so (and risking the wrath of stock users), TC1 appears to be an accommodation for the anti-stock element that demand a recreation opportunity removed from recreational stock use.

As most backcountry and wilderness stock users recognize, the way system, in many areas, has not been regularly maintained for many years. In some of these areas, the only maintenance that they may have received has been by outfitters, hunters and recreational stock users. Managers commonly allowed and often encouraged stock users to maintain the trails to a standard that would accommodate their use. It is very doubtful that the agency will permit TC1 trails to be 'cut out' to standards that

will accommodate saddle or pack stock. Classified as recreation facilities, trail maintenance to a standard greater than that identified for the specific trail class will change the recreation experience intended and would not be allowed. If users did maintain them to appropriate stock standards it could, potentially, lead to fines or, in the case of commercial users, loss of privileges. Since much of the backcountry and wilderness hunting takes place in the more primitive areas, this will have a profound impact on hunters!

The design parameter for TC2 lists a clearing width of 3 to 4'. This is the same as the old way standard -- clearly inadequate for pack stock, but adequate to accommodate a saddle animal and rider. The general written information for Pack and Saddle Design Parameters (p 2.31b of the proposed change), however, recognizes a need for "Three feet on both sides of the centerline" as "minimum clearance for pack trails." The general information also recognizes "some trails are simple day-use bridle paths and others are built to accommodate long strings of pack animals." Since TC1 is not designed to accommodate equestrians and, as such, isn't intended as a "bridle path," it can be assumed that TC2 is intended to constitute the "day use" portion of the trails continuum, and is not intended as a pack trail. If this interpretation is correct, there would really only be one of the five classes that would accommodate pack and saddle stock use in wilderness and primitive backcountry areas. This could conceivably reduce the amount of trail that would accommodate pack and saddle stock to a fraction of that which was managed to accommodate packed stock prior to the new classification. **Interpreted in this manner, the classification system would create a continuum of opportunities such that stock users would be limited to only the most heavily used areas of wilderness and backcountry with their loaded pack stock. From there, they would access an additional portion riding their saddle animals on TC2 trails, and would only be able to access the more remote areas on TC-1 trails if they left both their riding and pack stock behind.** This interpretation is further supported by discussions we have had with W.O. trails and recreation personnel in which they stressed their desired intent to provide a distinct continuum of opportunities. The other possibility is that the agency simply erred in listing 3 to 4' as the clearing width for TC2; in which case (in either case) we need to push to have it changed.

The new classification system also reflects a change from the manner in which recreation direction was determined in existing Forest Plans. The Forests were inventoried in the late 1970s and 1980s using an ROS Users Guide that listed '**horseback riding**' as an appropriate activity **in all settings** (including 'primitive'). In that Users Guide, 'Remoteness' criteria for determining appropriate recreation opportunity class described primitive as "an area at least 3 miles from all roads or trails with motorized use," and 'Evidence of Humans' criteria acknowledged that "evidence of trails is acceptable, but should not exceed standard to carry expected use." Areas classified as 'primitive' commonly contained multi-purpose or mainline/primary access trails designed to a full pack and saddle stock standard, as well as secondary and way trails developed to a lesser standard. Consistent with manual direction, these trails were supposedly managed for the mode of travel requiring the most demanding construction specifications.

Prior to the BCHA law suit, the changes to the trails classification system was apparently viewed as an 'administrative prerogative' not requiring public involvement. It is obvious that the choices a manager will have for selecting trail design and management parameters will be constrained by the new classification system. We were unable, through the lawsuit, however, to convince the court that application of the new system (limits imposed on the choices that a manager could make) would result in changes that necessitate NEPA assessment. It will be imperative that horsemen hold the agency accountable for making these changes at a local level.

The proposed classification system as it relates to wilderness legislation and the Congressional record:

At the time of passage of the Wilderness Act, nearly all of the trails in the National Forest System had been reconstructed and were being maintained to a standard intended to accommodate pack and saddle stock use safely and in a manner that would prevent unacceptable damage. The purpose of the Wilderness Act as stated in Section 2 was to "secure for the American people ... the benefits of an enduring resource of wilderness ... for the use and enjoyment of the American people." The "benefits" or public purposes recognized by Congress were further defined in Section 4b of the Act and specifically mention recreation and historic use. The wilderness trail system comprises an infrastructure necessary to accommodate the recreational and historical uses mandated in Section 4b. The responsibility to "make the wilderness accessible to those Americans who wish to use it" was affirmed in a 1998 Court decision in the case of Wilderness Watch vs. F. Dale Robertson regarding the Frank Church River of No Return Wilderness.

Senator Humphrey, in a speech introducing the wilderness bill, emphasized that "Existing uses and privileges are respected in this bill, ... this is not essentially a reform measure but rather a measure to insure the preservation of a status quo which fortunately includes a great resource of wilderness." The premise that "the Wilderness Bill is based on the assumption that we still can preserve in America an adequate system of wilderness areas without sacrificing any other program" surfaced repeatedly throughout the eight years of debate leading up to passage. It is further evident in the fact that many pre-existing uses which were thought to be inconsistent with wilderness – airfields, motor boat use, commercial grazing – were specifically

allowed to continue where they previously occurred. Senator Church, floor manager when the Act was passed, addressed the issue of preserving existing uses in a speech in 1976: “it was not the intent of Congress that wilderness be administered in so pure a fashion as to needlessly restrict its customary public use and enjoyment. Quite the contrary, Congress fully intended that wilderness should be managed to allow its use by a wide spectrum of Americans.” Applying the trail class guidance for each respective 'environ' (ROS class) as described in the classification guide, will result in major changes in the way that an area will be managed, and the users and activities that will be accommodated. It is inconceivable to believe that Congress would have condoned practices, such as those in the proposed trail classification system, that eliminate or significantly restrict a historic and accepted use such as pack and saddle stock while permitting existing airfield and motorboat use to continue.

Congress's intent to preserve the existing character of the areas included in the NWPS and provide for the public purposes of recreation and historical use can be tracked throughout eight years of Congressional proceedings leading up to passage of the Wilderness Act. Nowhere in the law or Congressional record does it require or even infer that the managing agencies must manage to a higher level of purity than that which existed when the areas were established as part of the Wilderness Preservation System. Through the new classification system, the agency is taking a portion of the wilderness that was historically served by low standard (way) stock trails, downgrading the standards to a point where stock is no longer accommodated, and managing these areas for a more primitive type of experience. This type of experience is already abundantly available in all wilderness areas. Many lightly used wildernesses are predominantly trailless. One large wilderness in central Idaho that I am quite familiar with is 98% trailless. Even heavily used wildernesses are commonly more than 50% trailless. These trailless areas can be accessed by cross country travel, as well as by undeveloped routes such as game trails, user created routes, and abandoned Forest Service trails which provide the same type experience intended on TC1 trails.

Neither the 1964 law, nor the congressional reports referenced in the law, specifically addressed trail management. As a result of the Forest Service's strict policy regarding interpretation of the 1964 Act, Congress, during proceedings leading up to passage of the 1978 Endangered American Wilderness Bill, issued specific direction as to “how the Wilderness Act should now be interpreted as it relates to certain uses and activities.” In House Report 95-540, Congress admonished the Forest Service for its purity approach and stated that “After more than a decade of experience, the committee recognizes the problems which differing interpretations of the Wilderness Act create.” To eliminate the opportunity for misinterpretation, the committee offered guidance as to “how the Wilderness Act should now be interpreted as it relates to certain uses and activities.... Trails, trail signs, and necessary bridges are all permissible when designed in keeping with the wilderness concept.” It went on to state, “These are often important to the recreational access and use of a wilderness area. Trail construction or maintenance can include the use of mechanical equipment where appropriate and/or necessary.” To further clarify its intent, it stated that “... the committee expects the Forest Service to maximize efforts to construct, maintain, and improve trails and trail systems in wilderness areas, so as to increase opportunities for a high quality wilderness experience for the visiting public.”

This National Trails Classification System is a return to the principles and philosophy of the “purity doctrine” and a direct contrast to the direction provided by Congress in 1978. In applying a trail standard previously not used (TC-1), the Forest Service has determined that equestrians would not be a managed use (and would not physically be accommodated on trails) within large areas of wilderness that were historically available to them at the time of, and following passage of, the Wilderness Act. By specifying that TC4 trails – the standard that most closely approximates mainline (easiest) -- would rarely occur in wilderness, the Forest Service has imposed hazards or obstacles that would not have been encountered by ‘long-string’ packers on the mainline trails that existed when the law was passed. In so doing, the agency has also redefined the ‘character’ of wildernesses from what it was when the areas were designated, and, therefore, from what was intended, by Congress.

The proposed classification system as it relates to backcountry areas:

The implications of the classification system are not limited to wilderness. In many areas, at least within the intermountain west, backcountry areas outside wilderness are less used, and are more primitive than wilderness. The primary means of administrative and user access to these areas has been by trail, and most have a trail system designed for and maintained to a “pack and saddle stock” standard. In previous Forest Planning efforts they have been identified as “primitive” or “semi-primitive” ROS classes. If the proposed system is implemented, recreational stock use will only be accommodated in heavily used backcountry areas meeting the definition of semi-primitive or higher and front country areas that have been highly modified by forest management practices such as timbering and mining.

Other concerns with the new classification system:

2. Cross slope parameters (5 – 10% for TC2, 5% for TC3 and 4) are unrealistic in steep, mountainous areas of the west.

3. Direction to use native materials only on TC1 and TC2 trails and emphasis that native materials will “Typically” be used in TC3 trails imposes unnecessary costs. Treated timber (round or dimensional) waterbars, puncheons, turnpikes, bridge members have a much longer service life than that of native materials. Use of treated materials in TC1 to TC3 should not be discouraged if it can be done in a manner that does not distract from the desired experience of a typical user. Laminated and steel members have even greater service life and should not be discouraged in the TC3 environs. These flexibilities will result in a more efficient use of limited trail budgets and increase the agency’s capabilities to protect resources and provide quality recreation opportunities.

It is also a concern that use of bridges is not listed in the pack and saddle design parameters for TC2 trails. Bridges should be considered an option over all streams that meet the criteria in paragraph 7 of 2.31b regardless of trail class. Use of bridges and other trail structures has been discouraged by many wilderness managers. There is no basis for this in the law. The apparent inconsistency between the law and Forest Service policy regarding structures was noted by wilderness scholars and supporters such as Michael McCloskey, Conservation Director of the Sierra Club. McCloskey (Oregon Law Review 45(4), 1966) recognized that the “summary description of the statutory scheme suggests that there are two purposes of the act: preservation without impairment, and compatible public enjoyment. ... If the purpose of the act is broadly construed to include enjoyment as well as preservation, then the basic administration of an area may be thought to include the need for structures such as footbridges across impassible torrents. ... The failure to provide them would have to mean a failure to meet the minimum requirements for proper administration.”

On a positive note, the discussion in p2.31b regarding fords is very good! All too often we have observed that trail construction and maintenance efforts stop at the high water mark – large rocks and obstructions are not removed nor are hazards immediately downstream from the ford removed which create an unsafe crossing situation. If fisheries or other resource considerations limit proper (and safe) management of a ford, a bridge should be constructed.

The long term policy of the agency that “cost” is not a consideration in wilderness has no basis in wilderness law. The only reference to cost in the 1964 Act is the statement that “No appropriation shall be available for payment of expenses or salaries ... required solely for the purpose of managing or administering areas solely because they are included within the National Wilderness Preservation System.” Bridges and other trail structures, and use of motorized trail equipment, were common in most wilderness areas prior to passage of the 1964 law. If the methodology for reconstructing and managing trails in wilderness (including the use of non-natural materials) exceeds the cost that would be incurred if the area were not wilderness, the agency is not meeting the intent of Congress. A reference in the Congressional Record of 1959, p#2645, regarding efficient management; “The [wilderness] bill requires that, so far as practicable, machines be kept out of the areas – that road building and the use of motor vehicles, motorboats, and aircraft be held to the minimum necessary for protection and efficient management of the area,” should also be interpreted to apply to the management of the trail system in general. Adherence to the belief that cost is not a consideration has limited the agency’s ability to maintain the infrastructure necessary to provide the “benefits of an enduring resource of wilderness ... for the use and enjoyment of the American people,” and contributed to the enormous backlog in trail maintenance.

4. The approach to signing described in the Trail Classes matrix is cavalier and irresponsible. Directional signs at trail junctions are not mentioned until Trail Class 3. Emphasis for signing in TC1 and 2 is limited to “regulation and resource protection.” This is a departure from previous sign policy. It is naïve to assume that unskilled travelers will not venture into the primitive and semi-primitive environs, and that experienced travelers do not need ‘assurance markers’ on low standard trails with intermittent and indistinct treads to tell them they are on a Forest Service trail and not a game trail or user established route. User safety must be a consideration on all trails. All junctions should be marked, and reasonable assurance marking should be provided on all trails. Once again, we call attention to Congressional direction provided in H.R. 95-540 previously quoted.

5. The statement made on page 38029 “Trails Classes are an inventory convention used to identify applicable Design Parameters ...” is a concern. Inventory is normally considered an administrative prerogative not requiring NEPA or public involvement. It is defined elsewhere in the document as “The prescribed scale of trail development, representing the intended design and management standards of the trail.” It must be clearly articulated in the direction that determination of the appropriate “trail class” is not discretionary with the trail manager, and is not a reflection of the existing condition. Establishing trail objectives, trail class and managed use must be based on a decision made through NEPA and appropriate public involvement. During initial implementation of the new trail classification system, trails managers were instructed, or otherwise given the prerogative, to inventory on-ground conditions and assign an appropriate trail class based on that inventory. The inventoried condition, in many cases, differed considerably from previously determined trail management objectives. This needs to be rectified.

6. Paragraph 1.2.1. Refers managers to land management plans or travel management decisions , but also recognizes that “These decisions may lack the detail needed to guide field operations.” It further directs managers to “Analyze specific

concerns to determine standards for a specific trail or trail system ... for construction and reconstruction.” It must be clearly stated that the follow up analysis must also comply with NEPA and NFMA and be subject to appropriate public involvement.

7. The “Need for Proposed Directives” on page 38024, is grossly inadequate to drive a revision of this magnitude and one that will impact segments of the user public so greatly. The stated “need” is simply that “Directives provide guidance to field units...” There is no discussion as to why a trails management program and classification system that was time tested over most of the last century has now, suddenly, become inadequate. There is also no indication that the efforts of the Trails Development Team, and the changes proposed as a result of this effort, was guided by a clear statement of need or subjected to an effects analysis.

In “Background” on page 38022, the document discusses a concern that “there was no system for gathering consistent, comprehensive data on real property inventory, facility conditions, program priorities, and budget needs for Forest Service resources,” and talks about efforts the agency has expended to rectify that situation. The document goes on to state that “In 1999, the Forest Service transitioned from the three way, secondary, and mainline trail classes to five trail classes keyed more precisely to the physical characteristics of NFS trails.” There is, however, no analysis or other data provided to explain this rationale, or document that the environmental consequences and potential impacts to a user public were considered. It appears, to this reviewer, that in an effort to improve the agency’s information management system as related to trails transportation and access management, and without consideration of how their efforts would affect the using public, this team totally changed the way trail facilities would be managed and set specific criteria and established a strategy for the allocation and zoning of trail oriented recreation experiences on National Forest System lands.