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### **Summary of comments regarding the Forest Service Trail Classification System:**

In response to a FOIA request from Attorney Kevin Garden, the Forest Service provided to Back Country Horsemen of America all of the comments on the proposed directives for the National Trail Classification System.

Comments were numbered, in pen, from 1 to 127. One hundred and two expressed concerns about the effects of the TCS on equestrians (numbers 26 through 127). There were several duplicates of the BCHA comments -- presumably these were mailed by state or local organizations or individuals without a cover letter. The majority of equestrian responses were from Back Country Horsemen (BCHA, BCH state and local organizations and individual BCHers). Comments were received from the American Horse Council (representing 185 unnamed equine organizations and several hundred thousand individual horse owners); from the Idaho Outfitter and Guide Association; the Kansas Horse Council; The Shawnee Trail Conservancy; and from a number of horse users who did not identify a specific affiliation.

Conspicuously absent were comments from commercial outfitters/packers, and hunters -- who are dependent upon stock for access to wilderness and backcountry. It is likely that these interests were uninformed of the agency's proposal and the potential impacts to their specific activity. Also silent or under-represented were state horse councils and breed associations. Although one could surmise that these were reflected in the American Horse Council's comment, it would have been more effective if they had commented individually or at least be referenced by name in the American Horse Council's letter.

Comment numbers 1 through 25 were assigned to other interests (numbers 3 and 4 were omitted from the package). Four were from IMBA or biking interests and were generally supportive of the proposal; and one from Blue Ribbon Coalition recommending more liberal parameters for motorized trails. Eight were from trail runners, 'quiet use' interests, and unaffiliated hikers/backpackers -- these generally favored a primitive environment, low standard trails, and expressed a concern that trails and closed roads were being opened to 'motorized use.' Although several of these expressed a preference for low standard trails, they also referred to the trails as hiking and horseback trails. It is significant that 'none' called for 'hiker only' opportunities.

Seven comments were from trails, environmental, and wilderness organizations. Two of these are significant from the standpoint of backcountry horsemen:

1. A comment was provided by "Wildlands CPR" on behalf of 56 environmental or wilderness organizations. Relief sought was a 'programmatically EIS.' Specifically this comment reflected concerns over:

- impact of the "overly rigorous nature of the proposed Design Parameters" on budgets.
- inadequacy of the statement of "need for sweeping changes to a system that has served recreationists well for many years."
- "racetrack-like Motorcycle Design Parameters ... displacing hikers, walkers, and bicyclists."
- "conversion of ... closed roads ... to trails open to motorcycle use."

The comment by Wildlands CPR further recommended "A different set of standards should be developed for trails within the National Wilderness Preservation System. Trails outside wilderness are often designed for a variety of purposes and uses. Trails and related structures within wilderness are subject to a specific, narrower standard -- the minimum required to protect the wilderness." They further state as their "chief concern" the "practical application of the proposed FSM/FSH direction ... that mixed use single track trails could end up looking and feeling like highly developed motorcycle racetracks;" and go on to state that "[m]any motorized and non-motorized users value primitive trails and remote backcountry experiences."

Although, as the authors state, this comment represents "thousands of non-motorized and muscle powered recreationists," it is significant that it does not call for providing "stock free" or "hiker only" trails. It appears that the authors carefully avoided any discussion of pack and saddle stock use and suitable parameters for that use in their reference to "the minimum required to protect the wilderness."

2. A comment was provided by: Conservation Northwest, Washington Trails Association, and the Washington Wilderness Coalition (Washington Wilderness Coalition was also listed in the Wildlands CPR comment). This comment expressed a concern about the "Mischaracterization and Unjustified Exclusion of Historic Wilderness Users." The comment specifically recognized the "Omission of Pack & Saddle Design Requirement for Trail Class 1" and stated that "the characterization of equestrian use as not typically a managed use in wilderness has no legal basis and is inconsistent with the historical meaning of the Wilderness Act."

This comment from the 'wilderness' constituency supporting BCHA's position on the TCS is particularly significant.

### Geographical origin of the comments by equestrians:

National	2 (BCHA & AHC)	Missouri	2
Alabama	1	Montana	12
Arkansas	14	Nevada	3
Arizona	4	New Mexico	6
California	5	North Carolina	2
Colorado	7	Oregon	3
Florida	1	Pennsylvania	1
Georgia	4	Tennessee	2
Idaho	1 (Id. Outfitter & Guides Assn)	Utah	1
Illinois	4	Virginia	2
Indiana	6	Washington	13
Kansas	1 (Kansas Horse Council)	Wyoming	1
		Unknown*	4

\* envelopes with return addresses were not provided, so in some cases a guess had to be made regarding the state of origin. When sufficient data wasn't provided to guess, the origin was listed as unknown.

Compared to comments from other sectors of the recreating public, the number from equestrians appears impressive. Considering the potential affects of the Trail Classification System on pack and saddle stock opportunities, however, the turn-out is disappointing. Less than ½ of 1 percent of our membership provided comment! That is really not a very impressive showing. We would probably find similar results on other major issues affecting horsemen at a national level -- such as Right to Ride.

The number of comments from mid-west and eastern states was surprising. Members in two states with BCH organizations did not comment -- Idaho and Michigan. I am a bit sheepish reporting that, although my review appears liberally throughout the comments, I obviously did not make the effort to send in a comment myself. Quite a number of national and state BCH leaders also neglected to send in comments.

Comments varied from many pages in length to a few sentences. Many of the more lengthy comments were a verbatim repeat of BCHA's comment. The shorter ones were simply a request to preserve opportunities for stock on trails. My guess is that the most effective ones were those that took the information from BCHA's comments and personalized it for their local situation. All who took the time to comment should be commended. Arkansas, Washington and Montana deserve special mention!

### Summary:

1. The preponderance of comment was from Back Country Horsemen, or other equine interests, expressing concern over the impact of the TCS on historical pack and saddle stock access.

2. Environmental, wilderness, and unaffiliated hikers and quiet use interests favor primitive and minimum standards necessary to protect wilderness, but do not call for 'hiker only' trails.
3. Wilderness and trail interests in Washington State specifically object to the unjustified impacts on equestrians imposed by the TCS.
4. The greatest concern of environmental, wilderness and unaffiliated hiker and quiet use interests relates to motorized use of trails and closed roads.
5. Both comments from environmental and wilderness interests reflect the same concern that BCHA has expressed about the inadequate statement of need to change a trail classification process that has served recreationists well for the last 100 years.
6. Hunters and Outfitters/Packers (with the exception of IOGA) were silent on the classification system.

**Recommendations:**

1. Establish communication with key wilderness organizations mentioned in Wildlands CPR comment and discuss implications of TCS to pack and saddle stock users, and the necessity of access if back country horsemen are going to support future wilderness proposals.
2. Remind the managing agencies and wilderness organizations that the Wilderness Act, subsequent wilderness legislation and the Congressional Record do not support reducing the standard of trails from that which existed at the time of designation. HR 95-540, in fact recommends improving trails to provide a quality wilderness experience.
3. Establish communication with key hunter organizations and state and national outfitter/packers organizations and discuss implications of TCS to pack and saddle stock users.
4. Schedule time at the next board meeting to explore ways of getting better involvement from BCH state and local organizations and individual members in important mail in campaigns.