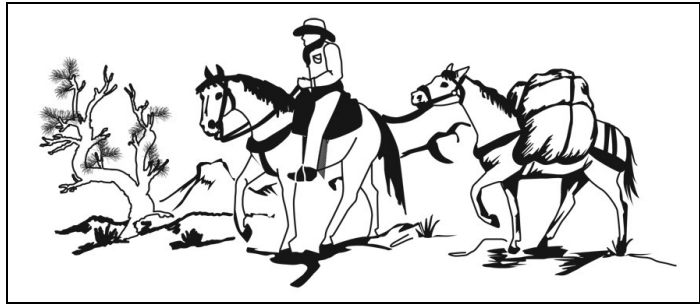


Back Country Horsemen of America



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October 30, 2008

Mr. Jonathan Stephens,
National Program Manager for Trails
and Congressionally Designated Areas
USDA Forest Service, Recreation and Heritage Resources Staff
1400 Independence Avenue SW, Stop 1125
Washington, D.C. 20250

Dear Jonathan,

The Back Country Horsemen of America (BCHA) provide the following comments on the National Trail Classification System, FSM 2350, and FSH 2309.18 as identified in Federal Register/Vol. 73, No. 201/Thursday, October 16, 2008.

Back Country Horsemen would like to express our appreciation for the significant changes that have been made in the National Trail Classification System since the 2006 draft was published. The new system provides design parameters that will adequately accommodate both saddle and pack stock on all trails that are actively managed for that purpose. It also provides the flexibility to use signing and bridges to provide safe and appropriate access, and the use of imported materials to manage the trail system in a cost effective manner.

We still have a concern with the implementation of the fundamentals and parameters in the trails management process at the local level. In the listening session, it was emphasized that Trail Management Objectives and subsequently Trail Management Classes are determined from land management plans, travel management decisions, trail-specific decisions, and other related direction rather than conditions that exist on the ground, existing or anticipated budget, or use levels. The local planning process that brought the new TCS to our attention based trail classes on existing condition and resulted in a significant reduction in trail standards. This mis-application of the process created an atmosphere of distrust regarding the 'agenda' of some of the team members that drafted the TCS. Although the appropriate instructions are contained in the training reference package that is available to all agency trail managers, they may easily be

overlooked. Additional emphasis in the training package and directives on the 'requirement' to base TMO's and Trail Classes on land management decisions would help to prevent future abuses of the system.

Throughout this process, Back Country Horsemen have received the assurance that the classification system would not result in a change in user status – that changing the trail management objectives and trail class from one which accommodated pack and saddle stock to one which would not accommodate pack and saddle stock would require an appropriate decision process (including public involvement and effects analysis). We would like to see that assurance clearly articulated in the above referenced manual and handbook directives and training materials.

We also have the concern that some of the older Forest Plans do not provide a clear decision or rationale regarding the intent of specific trails. This lack of specificity may be interpreted to provide discretionary and inappropriate prerogatives in the establishment of trail management objectives and trail classes. We would like to see it clarified in the directives that all historical uses must be accommodated unless there is clear direction in an appropriate planning document to preclude specific uses.

During the listening session, we were given the assurance that information on trail management objectives and trail classes would be made available to horsemen by local forest officers. During the law suit, forest service personnel were instructed not to provide trails information to horsemen. There may still be a question over what can and should be provided. A brief letter or message to line officers and trail managers from the Chief or Deputy Chief instructing them to make this information available on request is suggested to clear up any lingering confusion.

Specific concerns and recommendations regarding design parameters:

We recognize that Trail Class 1 is “Typically not designed or actively managed for equestrians, although use may be accepted,” however, a clearing height of 6’ simply *will not allow* passage by equestrians, and it would be a serious inconvenience for tall backpackers. With the infrequent maintenance that a Trail Class 1 is anticipated to receive, it is reasonable that vegetation will encroach into the corridor, and a clearing height of 6’ or less would probably be realistic. It is difficult, however, to comprehend why the agency would purposely “design” or maintain a trail to a clearing height that will not even accommodate a tall person walking in an upright position. Many of the old way trails have not been maintained for years, but have continued, with user maintenance as needed, to accommodate horse and rider. An allowable clearing height of 8’ would permit a recreational stock user to clear vegetation as necessary to permit minimal access. Incorporating the clearing limits for a “way” trail (8’ clearing height and 3-4’ clearing width), in place of those currently listed for TC-1, would better accommodate both backpackers and equestrians.

Standards for the old three class trail system were purportedly incorporated into the new five class system. Trail Class 1 appears to be a new classification with design elements that are lower than the old way trail standard intended as a hiking/pedestrian trail not actively managed for equestrian use (although use may be allowed). If it is known that a trail that has been classified

as Trail Class 1 was a historical stock/equestrian trail (either by design or use) our understanding is that it would be reclassified as a TC-2. Back Country Horsemen request that you confirm this understanding in your response to comments.

Specific concerns and recommendations regarding the Trail Class Matrix:

An additional concern was identified in the Interim Final that was not recognized in the earlier drafts. It relates to the discussion of "Obstacles" in the Trail Class Matrix and the wording "intended to provide increased challenge". The wording suggests that "obstacles" may intentionally be left or created in a trail tread. The fear with this wording -- "intended to provide increased challenge" -- is that it might encourage trail managers that are not familiar with the characteristics of pack animals to leave obstacles (or intentionally place obstacles) that could be removed with minimal effort during construction or maintenance. The troubling consequence of trail obstacles is that they often cause pack stock to leave the designed tread which can result in a wider than desired tread or multiple treads. Recreational stock users are often criticized for not keeping their pack stock on the trail, but there is often very little that we can do. This is especially apparent when obstacles, standing water, and brush along the trail are not removed. Most horsemen accept that removal of all 'obstacles' is not always cost effective or practical (especially on the lesser developed trails), but the suggestion of leaving them intentionally to "create challenge" is difficult to accept. Back Country Horsemen recommend that a 'footnote' be included with the pack and saddle stock parameters discussing the relationship of obstacles and tread width or multiple trails.

Commendations:

We wish to extend our appreciation to Jaime Schmidt and Jonathan Kempff for the extremely helpful presentation of the TCS at the listening session in Missoula, Montana, and to Jonathan Stephens and local Forest Service personnel for all the work they did in arranging and coordinating the session. We greatly appreciate the commitment that Joel Holtrup and Jim Bedwell made in listening to and hearing our concerns and those of the other participants. Once again it demonstrates what partners can do when they recognize a problem and determine to find an equitable solution.

Thank you for the opportunity to participate.

Respectfully yours,

A handwritten signature in cursive script that reads "Michael J. Reedy". The signature is written in dark ink and is positioned above the typed name and title.

Michael Reedy
BCHA Chair