



June 23, 2017

National Park Service
Whiskeytown National Recreation Area
c/o Trail Management Plan
P.O. Box 188
Whiskeytown, CA 96095

Dear Mr. Jarvis:

Back Country Horsemen of America (BCHA) appreciates this opportunity to provide the following scoping comments regarding the Trail Management Plan and Environmental Assessment. This letter is intended to augment the comment letter submitted under separate cover by the Backcountry Horsemen of California's Shasta-Trinity Unit.

BCHA's Executive Committee includes Alan Hill of BCH California's Shasta-Trinity Unit, who is a past chairman of BCHA and currently serves as our Public Liaison. Members of the Shasta-Trinity Unit BCHC participated in the May 25, 2017, public scoping meeting coordinated by the National Park Service in Redding. We appreciate the open and forward-looking dialogue undertaken by the NPS to date on this trails plan.

About Back Country Horsemen

Our mission is to perpetuate the common sense use and enjoyment of horses in America's back country and wilderness and to ensure that public lands remain open to recreational stock use. A large part of our mission includes assisting the various government agencies and non-profit organizations in the maintenance and management of public trails and horse camps, and to educate, encourage and solicit active participation in sustainable use of the back country resource by horsemen and women and the general public commensurate with our heritage.

We work in cooperation with government agencies to help clear trails, maintain historic sites, assist ecological restoration activities, sponsor educational seminars and clinics, and assist with service projects as requested. In 2016 alone, BCHA volunteers documented in-kind contributions in the order of approximately \$13.3 million for various projects throughout the nation. **BCHA currently maintains a 5-year general agreement with the National Park Service, signed by former Director Jarvis in August 2014.** The agreement provides a framework for cooperation wherein BCHA chapters can work with local park units on mutually-beneficial projects, including training seminars, living history events, ecological restoration activities, Leave No Trace™ equine education programs, and service projects including trail and horse camp maintenance.

Several BCH chapters currently maintain unit-specific Memorandums of Understanding with the National Park Service. Examples include Buffalo National River, Great Smoky Mountains and Mammoth Cave national parks, where BCHA chapters are authorized to conduct light trail and campsite maintenance and, for the former park unit, to assist in search and rescue operations.

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We greatly value and appreciate the recreational experience provided to horsemen and users of recreational pack and saddle stock in our national parks and throughout our nation's public lands. We take seriously our responsibility to demonstrate BCHA's ethic and commitment to preserving this heritage and the nation's cultural and natural resources. This includes BCHA's [Leave No Trace Stock Users Education Program](#). **BCHA has become the primary trainer of stock users in Leave No Trace principles and practices nationally through our Leave No Trace Master's Education Program.** The program is a partnership between BCHA, state and affiliate members, the U.S. Forest Service the *Leave No Trace™ Center for Outdoor Ethics*. Significantly, in 2015, BCH California was selected by the U.S. Forest Service Pacific Southwest Region for a five-year contact to serve as the sole provider of the agency's *Leave No Trace™* Equine Master Educator Course.

The use of pack and saddle stock has played an important role in American culture. There is a long tradition of BCH California members using pack and saddle stock on lands that are now designated as the Whiskeytown NRA. BCHA is committed to the long-term sustainable management of backcountry trails and campsites in a way that ensures compatible recreational uses are allowed in order to perpetuate the use and enjoyment of present and future generations. Our specific comments on the management plan follow.

Purpose of the Plan

According to the Park Service's Spring 2017 newsletter announcing the Trail Plan, the purpose of the planning effort is to:

...to define a designated trail system within the park to guide trail management, investment in trail infrastructure, and visitor use. The plan is needed to improve and diversify recreation opportunities, improve connectivity between features of interest inside the park and with regional trail systems, evaluate and eliminate or restore social/illegal trails and unsustainable or underutilized routes, and protect park resources.

As described below, we recommend the Trail Plan analyze alternatives that include expanding the degree to which the use of pack and saddle stock is authorized on trails within the NRA. Given that recreational stock use is considered a historic use, we encourage the Park Service to explore alternatives that allow this use where it is consistent with the protection of cultural and natural resources.

Proposed Action and Range of Alternatives

In its analysis of alternatives, the plan should consider, and make efforts to accommodate, the logistical needs of pack and saddle stock users who do not enter NRA via the adjacent national forest/NRAs. For example, the plan should address the need for adequate trailer parking at park trailheads and front country camping areas for person who haul their own horses and mules, particularly at proposed new trailheads. The plan also should include a discussion of the current availability of, or the need or demand for, additional infrastructure to support camping with pack stock in the park's front country areas. Such a need can be implied from recent recreational use projections documented by the U.S. Forest Service.¹

The availability of trailer maneuvering room at trailheads is critical to the use and enjoyment of NRA trails by horsemen. In contrast, the lack of trailer parking/turn-around space at trailheads represents a key limiting factor for equestrian use and enjoyment of the NRA. Even where such space is provided, equestrians need assurances that trailer parking areas will not be filled by passenger vehicles when they

¹ See 'Outdoor recreation trends and futures', <http://www.srs.fs.usda.gov/pubs/40453>

arrive at the trailhead. In the absence of such assurance, the question of being unable to park or turn around at the trailhead means that equestrian visitors are unlikely to attempt travel on the many miles of roads necessary to access NRA trailheads.

We also recognize and support the growing number of recreational equestrian events including the 50- and 100-mile endurance rides and related events organized by the American Endurance Ride Conference (AERC).

Development of Plan Alternatives Must Follow Relevant NPS Policies

It is not clear at this time whether the Trail Management Plan will analyze specific carrying capacity limits for recreational uses in the NRA. Current NPS *Management Policies* describe a series of steps to be taken by park superintendents in order to determine visitor carrying capacity (Section 8.2.1). Only after that process has completed its course, such as via the current Plan, should decisions to restrict an otherwise “appropriate” visitor use be considered. NPS policy regarding visitor carrying capacity can be summarized as follows:

1. Superintendents will identify ways to monitor for and address **unacceptable impacts** on park resources and visitor experiences.
2. The level of analysis necessary to make decisions about carrying capacities is commensurate with the potential impacts or consequences of the decisions. **The greater the potential for significant impacts or** consequences on park resources and values or the opportunities to enjoy them, **the greater the level of study and analysis and civic engagement needed** to support the decisions.
3. If and when park uses reach a level at which they must be limited or curtailed, the preferred choice will be to continue uses that are encouraged under the criteria listed in section 8.2, and to limit or curtail those that least meet those criteria.

NPS Management Policies, Section 8.2.1, emphasis added.

Section 8.2, Visitor Use, of the NPS Management Policies defines “unacceptable impacts” on park resources and visitor experiences as “impacts that, individually or cumulatively, would:

- be inconsistent with a park’s purposes or values, or
- impede the attainment of a park’s desired conditions for natural and cultural resources **as identified through the park’s planning process**, or
- create an unsafe or unhealthy environment for visitors or employees, or
- diminish opportunities for current or future generations to enjoy, learn about, or be inspired by park resources or values, or
- **unreasonably interfere** with park programs or activities, or an appropriate use, or the atmosphere of peace and tranquility, or the natural soundscape maintained in wilderness and natural, historic, or commemorative locations within the park, or NPS concessioner or contractor operations or services.”

Emphasis added. **We view these definitions as very descriptive and useful. Thus, we recommend they be applied in the Trail Management Plan** irrespective of whether specific carrying capacity analyses will be conducted.

The policies go on to state the following:

“If and when a superintendent has a reasonable basis for believing that an ongoing or proposed public use would cause unacceptable impacts to park resources or values, the

superintendent must make adjustments to the way the activity is conducted to eliminate the unacceptable impacts. **If the adjustments do not succeed in eliminating the unacceptable impacts**, the superintendent may (1) temporarily or permanently close a specific area, or (2) place limitations on the use, or (3) prohibit the use” (Section 8.2, emphasis added).

At present, we feel there is no reasonable basis for Plan alternatives that place limitations on recreational pack, saddle or endurance rider stock use in the NRA in the absence of compelling data on the existence of “unacceptable impacts” on park resources or use of pack stock’s unreasonable interference with the visitor experience of other uses. **We recommend that NPS personnel incorporate these criteria into the shaping of management alternatives in the Plan that are relevant to address pressing recreational management needs while meeting the National Environmental Policy Act’s requirement to explore in detail a “reasonable range of alternatives.”**

Use of Adaptive Management in Lieu of Plan Alternative-based Restrictions

Should the NPS find adequate justification for detailed analyses of Plan alternatives that restrict either the use of saddle and pack stock (or hiking/backpacking for that matter), we encourage the Park Service to disclose the body of science being relied upon to form the basis of the proposed restrictions. Moreover, references in the Plan to the scientific literature should discern between the effects of pack stock use by private users versus the effects of parties using commercial pack stock outfitters, if there are any who operate in the NRA. In the absence of such science, the Plan should not seek to disproportionately burden private stock users, who comprise a small percentage of NRA visitation.

As an alternative to restrictions proposed to these uses in the Plan, we propose the application of adaptive management techniques like visitor education and interpretive opportunities, the rerouting of segments of trail where conflicts are known to occur—or other less onerous restrictions including quotas regarding either the number of parties or temporal zoning—in lieu of Plan alternatives that **begin with an assumption that public recreational access must somehow be limited**. If warranted, existing adaptive management frameworks like Limits of Acceptable Change (and the former NPS version, Visitor Experience and Resource Protection) could be employed in the Plan in order to lay a foundation for the collection of visitor data on potential user conflicts and management options to minimize or avoid conflict before such issues reach critical thresholds.

Restrictions to Recreational Uses Must be Limited to the Minimum Necessary

With regard to mitigating adverse impacts from or between NRA uses, NPS Management Policies (2006, Section 8.1.2) state:

“In all cases, impacts from park uses must be avoided, minimized, or mitigated through one or more of the following methods:

- visitor education and civic engagement
- temporal, spatial, or numerical limitations on the use
- the application of best available technology
- the application of adaptive management techniques”

NPS Management Policies (8.2.2 Recreational Activities) further state that “Restrictions placed on recreational uses that have been found to be appropriate will be **limited to the minimum necessary** to protect park resources and values and promote visitor safety and enjoyment” (emphasis added). Therefore, we encourage park personnel to consider options to mitigating any real or perceived conflicts associated with recreational stock use in the NRA prior to including alternatives in the draft Trail

Management Plan oriented toward restrictions in use of pack stock. Doing so would appear consistent with NPS policy, as described above.

As stated earlier, in order to reduce the potential for visitor conflict, **the Plan should include proactive methods of visitor education, including the use of interpretive materials available at trailheads**, to convey to hikers, backpackers and mountain bikers to expect encounters with parties with pack stock. **The Plan also should detail methods by which visitors traveling via foot, bike and with recreational equestrian stock could enhance communication and work toward minimizing "conflict" between user groups.** Changing the expectations of individuals prior to their embarking from the trailhead appears to represent a first step in doing so.

Use of Available Science to Aid Decision-Making

For the purpose of providing background for the EA planning team on emerging peer-reviewed science associated with equestrian use of trails in national parks and on public lands, we offer the following summary for consideration as warranted in the Whiskeytown NRA Trail Management Plan.

Waterborne Pathogens

As part of the planning process, we encourage NPS personnel to explore the implications of recent research conducted by Dr. Rob Atwill of the University of California, Davis, including his study of waterborne pathogens in Yosemite National Park. Dr. Atwill's work demonstrates the (insignificant) level by which adult pack stock might shed, via their manure, detectable oocysts of *Cryptosporidium*², a parasite that can affect humans. Dr. Atwill's research also demonstrates that native mammals at Yosemite, including squirrel, raccoon, marmot and some avian species, are far more likely to be the source of waterborne pathogens than either pack stock or domestic livestock³. In one study at Yosemite National Park, Dr. Atwill found that a population of Belding's ground squirrel was documented to shed *Cryptosporidium* oocysts at a rate that might be matched by no less than 3,000 adult horses.⁴

If the issue of waterborne pathogens is raised, the plan should consider the implications of scientific findings and recommendations made by Dr. Atwill and others to shed light on appropriate measures to employ, if any, in the plan to mitigate the potential negative effects and spread of waterborne zoonotic pathogens and parasites associated with pack and saddle stock use. According to personal communications with Dr. Atwill, an individual's personal hygiene habits—and whether they wash/disinfect their hands effectively after digging/using a cat hole or pit toilet—is the greatest factor in avoiding zoonotic pathogens and parasites when visiting the backcountry. We request that the plan approach the issue with such current science in mind.

² Atwill, E.R. 2008. *Hetch Hetchy watershed pack stock and microbial water quality study*, University of California, Davis, CA. Report prepared for Yosemite National Park.

³ Atwill, E.R. Environmental loading of *Cryptosporidium* spp. from Belding's ground squirrels and pack stock in Yosemite National Park. International Conference on Diseases of Nature Communicable to Man. Fairbanks, Alaska. August 8-10, 2010.

⁴ National Park Service, Yosemite National Park, 2008 Pack Stock Use Assessment in Subalpine Meadows of the Tuolumne River Watershed. November 2010. Resources Management and Science, Yosemite National Park.

Noxious/Invasive Weeds

As part of the planning process, we also encourage NPS personnel to explore the implications of recent research conducted by Dr. Stith T. Gower, formerly of the University of Wisconsin, Madison. Dr. Gower's studies indicate that horses and pack stock are unlikely, if at all, to spread invasive weeds along trails under the conditions he studied in the U.S. in both eastern ecosystems⁵ and nine western ecosystems, including Redwoods National Park.⁶ For example, his 2013 study of western ecosystems concludes with the following statement:

The 0% germination and establishment rate of weeds from hay, manure and hoof debris plots on the horse trails at the nine study sites illustrates the difficult physical and environmental conditions that seedlings experience during the critical germination and establishment phase.

Although the science has found that horses and pack stock are capable of excreting seeds (both native and non-native) along backcountry trails, such seeds face harsh conditions and are highly unlikely to germinate. Based on recent studies by Dr. Gower, the planning process should question the assumption that use of horses and pack stock represent a significant vector for the spread of invasive or noxious weeds. The plan should consider the implications of scientific findings by Dr. Gower and others that shed light on appropriate measures to employ, if any, in the plan to mitigate the potential negative effects and spread of noxious or invasive weeds resulting from the use of horses and pack stock.

Social Science Should Take into Account the Views of All Trail Users

If social science research/literature is to be applied in the plan as it relates to the potential for visitor perceptions of “conflict” on trails or in campsites, we would ask that the science be balanced with respect to whose perceptions are being taken into account in making management decisions (i.e., hikers/backpackers, horsemen/stock users, mountain bicyclists or all user groups). We would object to restrictions on the use of pack and saddle stock based on narrowly-applied studies or samples from which the social preferences of a subset of hikers/backpackers and/or mountain bicyclists is either cited or implied. For example, limitations proposed for saddle and pack stock use should not be justified as necessary to reduce visitor conflict or to enhance the enjoyment of “solitude” by users who prefer not to share trails with stock and stock users.

Rarely do we see social science that takes into account the views and desired experience of traditional horsemen and stock users. Accordingly, we hope and expect that any application of social science in the plan be balanced with respect the range of trail users whose opinions have been sought. We remain optimistic that most types of visitor conflict can be resolved through education and broader awareness of the history and role of horse and pack stock use in our national parks.

⁵ Gower, ST. 2008. Are horses responsible for introducing nonnative plants along forest trails in the eastern United States? *Forest Ecology & Management* 256:997-1003.

⁶ Horses and Invasive Plants: The Western USA Study by Dr. Stith T. Gower, Professor of Forest Ecosystem Ecology, Department of Forest & Wildlife Ecology. University of Wisconsin-Madison. (note: the article originally appeared in the April 2013 issue of *Endurance News*, official publication of the American Endurance Ride Conference, www.aerc.org)

Conclusion

Thank you for this opportunity to submit public scoping comments on the Whiskeytown NRA Trail Management Plan. We appreciate the efforts of park personnel to include the large equestrian recreational community use in this important planning effort. It is our belief that only through strong partnerships and effective collaboration can our mutual goals of protecting park resources and maintaining publicly-supported trail systems be achieved.

Sincerely,

A handwritten signature in blue ink that reads "Freddy Dunn". The signature is written in a cursive, slightly slanted style.

Barbara "Freddy" Dunn, Chairman
Back Country Horsemen of America

Copy: BCH California Shasta-Trinity Unit