



February 22, 2016

Randy King, Superintendent
Attn: Wilderness Stewardship Plan
Mount Rainier National Park
55210 238th Avenue East
Ashford, Washington 98304-9751

Dear Superintendent King:

Back Country Horsemen of America (BCHA) and Back Country Horsemen of Washington (BCHW) appreciate this opportunity to provide the following scoping comments regarding the park's Wilderness Stewardship Plan (WSP). Our members have participated in each of the four public scoping meetings coordinated by the National Park Service in November and we appreciate the open and forward-looking dialogue initiated by you and park staff.

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 2014 alone, BCHA volunteers documented in-kind contributions to the tune of approximately \$14.4 million for various projects throughout the nation. **BCHA currently maintains a 5-year general agreement with the National Park Service, signed by Director Jarvis in August 2014.** The agreement provides a framework for cooperation wherein BCHA units 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 and Great Smoky Mountains and Mammoth Cave national parks, where local BCHA units are authorized to conduct light trail and campsite maintenance and, for the former park unit, to assist in search and rescue operations. **BCHW works in cooperation with Olympic National Park and, in 2013 alone, documented a volunteer-related in-kind contribution exceeding \$50,000** that included trail maintenance and assistance with relocating the historic Enchanted Valley chalet, located in park Wilderness, in 2014.

**P.O. Box 1367 | Graham WA 98338-1367
Toll Free 1-888-893-5161 | www.bcha.org**

We are proud that Pierce County BCHW has worked for many years in partnership with Mount Rainier staff in order to maintain the Laughingwater Trail, an important connector to the Pacific Crest National Scenic Trail. **We encourage you to consider extending and formalizing this partnership with respect to trail maintenance and other needed stewardship projects within Mount Rainier National Park.** For example, the Superintendent of Sequoia-Kings Canyon National Parks recently met with Back Country Horsemen of California's High Sierra Unit to discuss a partnership to develop front country horse camps approved via the parks' recently completed WSP.

We greatly appreciate and value 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 wilderness character. 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, BCHA was selected by the U.S. Forest Service Pacific Southwest Region (California) for a five-year contract to serve as the sole provider of the agency's *Leave No Trace™* Equine Master Educator Course.

Cultural Significance of Recreational Stock Use

The use of pack stock has played an important role in American culture. There is a long tradition of using pack and saddle stock not only in Mount Rainier National Park but throughout the West. BCHA carries on this tradition in modern times, as does the pack stock program administered by Mount Rainier National Park used in support of park management and scientific investigation. Today's horsemen and women relish this cultural heritage and readily embrace the responsibility and obligation to care for our parks and public lands through application of traditional methods and a primitive mode of travel.

We recognize the seemingly conflicting policy directives under which the NPS operates, including the 1916 Organic Act and 1964 Wilderness Act, and the demanding task the agency faces in simultaneously devoting much of the park to recreation while also protecting wilderness character. BCHA is committed to the long-term sustainable management of Wilderness 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 Mount Rainier WSP follow.

Guiding Principle

In preparing the WSP one of the guiding principles should be that horseback riding, including the use of pack stock and mules, are primitive, non-mechanized modes of travel that are appropriate in Wilderness and consistent with the purposes and provisions of the Wilderness Act. These are historic and culturally significant uses that preceded congressional designation of park Wilderness (1988) and the establishment of the park itself. These sentiments are consistent, in part, by wording included in the park's 2002 General Management Plan (GMP), which states the following:

Prohibiting pack stock on historic trails such as the Wonderland Trail and Northern Loop Trail would be inconsistent with the period of significance for the National Historic Landmark District. The use of pack stock is a historic use of these trails, which give park staff and visitors better access to the park (p.255).

Purpose of the Plan

According to the December 23, 2015, Federal Register notice announcing the public scoping period, the objective of the WSP planning effort is:

To analyze a range of alternatives for achieving wilderness stewardship objectives, which include **providing appropriate types and levels of access for visitors and authorized users**, protecting cultural and natural resources, and adhering to legally- mandated management and preservation requirements (emphasis added).

We hold great hope that the WSP will analyze a number of alternatives that include expanding the degree to which horseback use is authorized on the existing Wilderness trail system. Given that horseback use is considered both an historic and appropriate use in Wilderness, we encourage the Park Service to explore alternatives that allow this use where it is consistent with the protection of cultural and natural resources.

In addition, the park's Winter 2015 Scoping Newsletter for the WSP lists the following two needs (of five total) that are to be met via the planning process:

Develop an approach to managing visitor use such that **wilderness character is preserved and public use and enjoyment are provided** (Need #1, emphasis added).

Clarify how decisions about wilderness administrative actions are made and documented (Need #3).

We welcome such clarification and would argue that visitor access for persons on horseback along nearly all trails within Mount Rainier Wilderness, with a few exceptions, at present is unduly limited as a result of implementation of the park's 2002 GMP. The GMP's Record of Decision (ROD) prohibited travel by horseback on nearly 100 miles of trails in park Wilderness, remarkably with little justification and, importantly, does not appear to be supported by the relevant science. Instead, the text in the GMP includes sweeping generalizations and verbatim text contained in the park's 1992 Wilderness Management Plan such as the following:

Pack stock such as horses, mules, and llamas would be allowed only on the Pacific Crest Trail and Laughingwater Creek Trail...Although relatively few people use pack stock in Mount Rainier National Park, this action would be taken to reduce impacts on natural resources that are associated with the use of pack stock, including soil erosion and the spread of nonnative plants (GMP, p.77, Preferred Alternative).

Yet nowhere in the GMP, its accompanying Environmental Impact Statement, ROD nor in the 1992 Wilderness Management Plan (WMP) could we find citations to relevant science that the use of horses and pack stock, at levels reported in park Wilderness, had resulted in adverse impact (either minor or significant) to park natural resources. No citations were given with respect to the documentation of soil erosion directly attributed to stock use nor are citations given for the spread of nonnative plants that was attributed to pack stock. **Such impacts were only implied, but not supported by documentation.** For example:

Several studies have demonstrated that stock can cause significant damage to trails and campsites not constructed to support such use. Therefore, stock use is limited to selected trails and trailside camps in more durable soils and vegetation. **Stock waste can also** introduce exotic plants into the Wilderness (WMP, p.70, Existing Conditions, emphasis added).

In fact, some of these generalized statements could be made about hiking and backpacking—activities that occur at much higher rates of intensity and extent throughout park Wilderness. Yet we would not want to see, nor did the GMP propose, to largely eliminate foot travel on nearly 100 miles of trail in the Mount Rainier Wilderness based primarily upon sweeping and unsupported generalizations made about the impacts of that use. We hope that the current WSP effort will not repeat that same bias.

Range of Alternatives

The decision related to use of horses and pack stock in the 2002 GMP represents, in our minds, a disproportionate and significant adverse effect on the ability of horsemen to enjoy Mount Rainier Wilderness. Horsemen understand many of the limitations on our use posed by resource constraints at Mount Rainier National Park (rocky alpine and subalpine environments with thin soils, sensitive vegetation and wetlands associated with meadows, etc.). However, **the exclusion of horseback use on most of the park's Wilderness trails carries the unintended consequence that only persons on foot are currently able to immerse themselves in a Wilderness experience.** Thus, the 2002 decision largely eliminated opportunities for horsemen to enjoy the park.

Moreover, for visitors that are either aged, mobility impaired, or otherwise unable to venture into park Wilderness on their own, the only opportunity to visit the park's Wilderness often is via horseback or mule—an option that is largely unavailable to the public at present. We believe the 2002 GMP went too far in this regard and **we respectfully request the Park Service to revisit the near ban on the use of pack stock in park Wilderness. Doing so would seem consistent with 2006 NPS Management Policies** and the agency's current Find Your Park campaign to attract more diverse visitors, not turn people away from exploring the grandeur of Wilderness if they prefer instead the time-honored mode of primitive travel provided by pack and saddle stock.

Accordingly, we encourage the NPS to analyze in the WSP a series of action alternatives that include authorization for varying levels of increased access to park Wilderness by persons using pack and saddle stock. These alternatives could include a reassessment of all trails closed to stock use in the 2002 GMP, the reversal of trails closed to stock for some portion of the nearly 100 miles of trail closed to stock use in 2002¹, to a modest subset of trails being reauthorized for stock use as identified in the February 14, 2016, scoping comment letter submitted by Back Country Horsemen of Washington. Alternatives also could be analyzed in the WSP that include the creation of new trail(s) or trail reroutes where stock use is authorized, if there remain concerns about trail sustainability or user conflict in specific locations. In such cases, BCHA/BCHW would likely offer to share with the Park Service the responsibility for trail construction or maintenance. In other words, we are willing to formalize agreements that would require Back Country Horsemen to provide “sweat equity” for the upkeep of stock-friendly trails. By doing so, we believe that the Park Service can develop a thoughtful approach to managing visitor use such that wilderness character is preserved and the public use's and enjoyment of Mount Rainier Wilderness is diversified and enhanced.

Baseline Datum for Wilderness Management

It is our understanding that the baseline datum against which all wilderness management activities will be compared in the WSP is the date when Public Law 100-668, the “Washington Parks Wilderness Act,” was enacted. In other words, the goal of the WSP will be to restore, protect, and enhance overall wilderness character of the Mount Rainier Wilderness using as a baseline those conditions that existed

¹ With the understanding that we are referring to trails located primarily or exclusively in the “Trail Zone” (i.e., generally below 6,000 feet MSL) as identified in the park's 1992 Wilderness Management Plan.

in 1988, when Congress deemed 216,845 acres (and subsequent additions) within the park as suitable for designation as Wilderness. **We would appreciate clarification in the Draft WSP as to the timeline by which the Park Service has established its baseline datum.**

Previous Decisions to Limit Pack Stock Use Must be Supported by Science

As stated previously, we believe that decisions made in the 2002 GMP to severely restrict use of pack stock in park Wilderness was not supported by the necessary science. For example, we are not aware of any water sampling program or lab analysis conducted at Mount Rainier National Park that implicates stock use as a causative factor in water quality degradation. Nor could we find reference to the park's several studies of exotic plants that directly implicate pack and saddle stock as a definitive source of known populations of noxious and invasive weeds identified along park trails. The mere presence of exotic plants along park trails and roads does not point to a cause-and-effect relationship with stock use, as there existed no stock-only trails to serve as a control when measured against trails that were shared by hikers and horsemen. To the contrary, in referencing a series of earlier studies of exotic plants, the 2002 GMP concludes with the following statement that infers vectors other than horse use are at play in off-trail areas at Mount Rainier National Park:

Hikers, cars, and horse use were identified as the primary means of seed dispersal. The presence of exotic species away from roads may indicate that wind or offtrail hikers are also effective vectors of exotic plant species (GMP, p.138).

Yet the 2002 GMP and ROD extol the benefits of largely eliminating what little horse use occurred along 100 miles of park trails as "beneficial" with respect to minimizing the potential for the spread of exotic plants. This, despite evidence of a cause-and-effect relationship and the presence of other, much more numerous potential vectors for the spread of exotic plants. The GMP reads:

Although relatively few people use pack stock in Mount Rainier National Park, this action would be taken to reduce impacts on natural resources that are associated with the use of pack stock, including soil erosion and the spread of nonnative plants (GMP, p.77).

Such a statement appears unsupported. **We therefore respectfully request that the WSP revisit the 2002 decision to eliminate pack and saddle stock use on most trails in Mount Rainier Wilderness. In locations of known or documented stock-related resource damage, we ask that the WSP consider alternatives beyond simply limiting pack stock use.** Such alternatives could include reroutes of trails or trail segments, hardening of trail surfaces, use of designated camping areas, and the use of portable electrical fencing or other means to contain pack stock during overnight camping. As described below, we believe that methods exist to mitigate most stock-related impacts or conflicts, and which allow the Park Service to maintain a wilderness experience wherein it might best achieve the following policy objectives:

Integrate resource protection with an **appropriate range of visitor uses** (emphasis added);

...Reduce physical, ecological and social impacts of human use in Wilderness through education or innovative management. **Regulate at the minimum necessary** to achieve Wilderness goals and objectives" (Wilderness Management Plan, p.17, emphasis added); and

Preserve important **historic, cultural, and natural aspects of our national heritage**, and maintain, wherever possible, an environment which supports **diversity, and variety of individual choice** (ROD, p.8, citing Council on Environmental Quality guidelines on implementing the National Environmental Policy Act).

We offer the following issue-specific recommendations for consideration in the WSP.

Waterborne Pathogens Resulting from Pack Stock Use (or Lack Thereof)

As part of the WSP scoping process, we encourage park 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 horses.⁴

The WSP 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 WSP to mitigate the potential negative effects and spread of waterborne zoonotic pathogens and parasites associated with 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 in the back country and Wilderness. We request that the WSP analysis approach the issue with such current science in mind.

Noxious/Invasive Weeds Resulting from Pack Stock Use (or Lack Thereof)

As part of the WSP scoping process, we encourage park personnel to explore the implications of recent research conducted by Dr. Stith T. Gower 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 in eastern ecosystems⁵ and nine western ecosystems⁶ in the U.S. 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.

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.

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)

Consequently, 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 WSP should start with the assumption that the use of horses and pack stock is not considered as a significant vector for the spread of invasive or noxious weeds.** The WSP should consider the implications of scientific findings by Dr. Gower and others that shed light on appropriate measures to employ, if any, in the WSP to mitigate the potential negative effects and spread of noxious or invasive weeds resulting from the use of horses and pack stock.

Relevant NPS Policies Affecting Stock Use

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 and we recommend they be applied in the current WSP effort** irrespective of whether specific carrying capacity analyses will be conducted. Rather, we view these policies as the lens through which the Mount Rainier WSP should analyze the compatibility of horse and stock use on Wilderness trails.

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).

As stated previously, we feel there was no reasonable basis for decisions in the park’s 2002 GMP to severely restrict recreational pack stock use in park Wilderness in the absence of compelling data or scientific findings. In light of current NPS policies, the 2002 GMP failed to document the existence of “unacceptable impacts” on park resources or to demonstrate that use of pack stock had resulted in unreasonable interference with the visitor experience of other uses. **We therefore recommend that NPS personnel incorporate these criteria into shaping management alternatives in the WSP that are relevant to address pressing wilderness management needs while meeting the National Environmental Policy Act’s requirement to explore in detail a “reasonable range of alternatives” that, in this case, align with current NPS policies for managing visitor use in Mount Rainier Wilderness.**

Use of Social Science Must Take into Account the Views of Stock Users

If the social science literature is to be applied in the WSP 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 or both). We strenuously object to closures on the use of pack stock based on narrowly-applied studies from which the social preferences of backpackers and hikers is either cited or implied. For example, limitations proposed for stock use should not be justified as necessary 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 also the views and desired experience of traditional horsemen and stock users. **Accordingly, we hope and expect that any application of social science in the WSP analyses to be balanced with respect the range of legitimate Wilderness visitors 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 Mount Rainier National Park.

The WSP Should Consider the Logistical Needs of Pack Stock Users

Access to the Mount Rainier Wilderness at present by private horsemen is very difficult. **In its analysis of alternatives, the WSP should consider, and make efforts to accommodate, the logistical needs of pack stock users** who do not enter park Wilderness via adjacent national forests or private land. For example, **the WSP 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.** The WSP should also 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.⁷

The WSP Should be Viewed as a Vehicle to Engage Partners

Over the anticipated life of the WSP, the Park Service may find that it has insufficient resources to maintain trails in Mount Rainier Wilderness to standards necessary to maintain visitor safety and resource protection. Given that the WSP represents a long-range (10- to 15-year) plan, **it would be prudent to consider in the WSP the option of enlisting additional qualified partners in routine trail maintenance.** For example, establishing formal agreements with qualified non-profit organizations, such as Backcountry Horsemen of Washington (BCHW) and its partner, the Pacific Crest Trail Association, would serve to augment the agency’s beleaguered trail maintenance budget and could preclude the need to either close trails or reclassify some trails as either “unmaintained” or minimally maintained.

In addition, as stated earlier in this scoping letter, we encourage park personnel to work in partnership with BCHW to develop a park-wide Equine Leave No Trace™ program that is to be included in the WSP. We also encourage Mount Rainier staff to tier from the national BCHA-NPS Agreement and **consider in the WSP how it might partner with local BCHW units and other partners to complete trail maintenance and other stewardship projects within Mount Rainier Wilderness.** BCHW has multiple units on either side of the Cascades that would happy to enter into a Memorandum of Understanding or other such service-type agreement for the planning, maintenance and upkeep of these facilities.

⁷ See ‘Outdoor recreation trends and futures’, <http://www.srs.fs.usda.gov/pubs/40453>

Conclusion

Thank you for this opportunity to submit public scoping comments on Mount Rainier National Park WSP. We appreciate the efforts of park personnel to seek every opportunity to include the pack and saddle stock community in this important planning effort. It is our belief that only through strong partnerships and effective collaboration can our mutual goals of preserving Wilderness character and maintaining publicly-supported trail systems be achieved.

Sincerely,



Donald Saner, Chairman
Back Country Horsemen of America
P.O. Box 1367
Graham, WA 98338



Kathy Young, President
Back Country Horsemen of Washington
110 W. 6th Avenue, PMB 393
Ellensburg, WA 98926