

Back Country Horsemen of America



PO Box 1367

Graham WA 98338-1367

360-832-2461 FAX 360-832-1564 Toll Free 1-888-893-5161

www.backcountryhorse.com

April 24, 2014

Sent via email to brca_information@nps.gov

Program Analyst
Bryce Canyon National Park
P.O. Box 640201
Bryce, Utah 84764

Re: Proposed Rule Change for Private Horse Use

Dear Superintendent Bradybaugh:

Backcountry Horsemen of America ("BCHA") is pleased to submit the following comments regarding the Proposed Rule Change for Private Horse Use at Bryce Canyon National Park. It is the mission of BCHA 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 BCHA's mission includes assisting the various government and private agencies in the maintenance and management of public trails and horse camps, and to educate, encourage and solicit active participation in the wise use of the back country resource by horsemen and the general public commensurate with our heritage. BCHA works in cooperation with government agencies to help clear trails, maintain historic sites, construct new facilities, sponsor educational seminars and clinics, and assist with service projects as requested. BCHA members contribute thousands of volunteer hours each year helping maintain trails on federal, state and private lands.

BCHA greatly appreciates and values the recreational experience provided to horsemen and users of mules in Bryce Canyon National Park. We take very 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: <http://www.backcountryhorse.com/education/leave-no-trace/>. The program aims to educate, encourage, and solicit active participation in the wise and sustained use of back country resources by horsemen and the general public. 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 and *Leave No Trace, Inc.*

The use of recreational stock has played an important role in American culture. There is a long tradition of using pack and saddle stock throughout national parks and public lands throughout the West, and BCHA carries on this tradition in modern times. With this use comes the responsibility and obligation to care for our public lands in order to ensure their use for future generations. It is for these reasons that we are greatly concerned with the Proposed Rule Change for Private Horse Use.

Our specific comments on the Proposed Rule Change follow.

As private users of recreational stock, we recognize the importance of minimizing safety hazards and resource damage on our public lands. We appreciate the Park Superintendent's announcement of a 30-day comment period on the matter. By doing so, he recognized the high level of public interest and desire of visitors who use their horses and mules to enjoy the beauty and splendor of Bryce Canyon and other National Parks.

We understand that portions of the trails at Bryce Canyon are unusually narrow and steep. This is why horse trails at the park are designated "one-way," in order to minimize the potential for parties on horseback to pass each other along segments of trail where it is dangerous to do so. We understand that additional measures are needed to avoid private and commercially-guided parties from converging at those sections of trail where there is high safety risk.

We do not, however, support Bryce Canyon National Park's current proposal that all private stock parties be required to hire the services of a commercial guide for the duration of their park visit. We believe such an action is unprecedented in the National Park Service's Intermountain Region, if not throughout the entire National Park System. We do not wish to see such a precedent set.

We appreciate the fact that the Park Superintendent is open to constructive comments that would help alleviate the safety situation and ensure that riders stay on designated trails and not damage park resources. In addition to the currently required 48-hour advance check-in by private stock users, we recommend the park adopt an alternative to the Proposed Rule Change that would seek to restrict the time(s) of day a private party be allowed to traverse sections of trail where there is high safety risk, in order to allow commercially-guided trips safe passage.

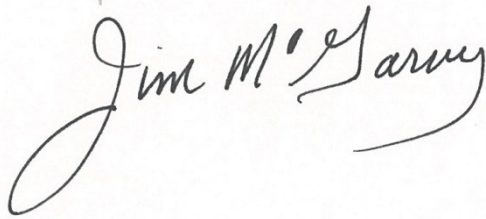
We understand the need to minimize damage to off-trail soils and cultural resources. We recommend that private stock parties be required to check in--prior to riding in the park--both to coordinate departure/itinerary logistics regarding rider safety and to receive a briefing from either park or commercial outfitter personnel. The briefing could be used to convey regulations pertaining to use of park trails, including prohibitions on off-trail travel, cutting of switchbacks and riding parallel or side-by-side on designated trails where the trail tread is narrow.

We do not object to paying a modest fee to cover agency and/or commercial outfitter costs associated with the recommended pre-departure briefing for private stock parties. We also encourage the Park Service to explore methods by which NPS law enforcement personnel can more readily identify and make contact with stock users who do not follow the rules. These methods should emphasize streamlined communication with park volunteers and the stock concession operator to report violations in a timely manner.

Our state organization, Back Country Horsemen of Utah (BCHU), has volunteered to assist Bryce Canyon National Park to develop a curriculum for the pre-trip training for private stock users. They have several Master Trainers versed in *Leave No Trace* techniques, and the Park Service would benefit from cultivating closer relations with BCHU and enlisting their assistance.

Thank you for this opportunity to submit public comments on the Proposed Rule for Private Horse Use. We implore the NPS to seek every opportunity to include the horse and pack stock community in these and similar planning efforts throughout the park. It is our belief that only through strong partnerships and effective collaboration can our mutual goals of creating sustainable and publicly-supported trail systems be achieved.

Sincerely,

A handwritten signature in black ink that reads "Jim McGarvey". The signature is written in a cursive style with a large, looping initial "J" and a long, sweeping underline.

Jim McGarvey
Chairman
Back Country Horsemen of America
www.backcountryhorse.com
1-888-893-5161
C: 706-669-1015