



May 18, 2014

M. Sarah Creachbaum, Superintendent  
**ATTN: Wilderness Stewardship Plan**  
Olympic National Park  
600 E. Park Ave  
Port Angeles, WA 98362

Dear Superintendent Creachbaum:

Back Country Horsemen of America (BCCHA) appreciates this opportunity to provide the following public comments on the preliminary draft alternatives developed for the park's Wilderness Stewardship Plan (WSP). We applaud the park's public outreach efforts to date and the ability of the public to shape the WSP alternatives at this early stage.

### **About Back Country Horsemen**

BCCHA's 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.

BCCHA works 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 2013 alone, BCCHA volunteers documented in-kind contributions to the tune of approximately \$14 million for various projects throughout the nation. As you know, members of BCCHA's Washington state affiliate have long been partners with the Olympic National Park in addressing backcountry maintenance needs and visitor education.

We greatly appreciate and value the recreational experience provided to horsemen and users of recreational pack and saddle stock in Olympic National Park. We take seriously our responsibility to demonstrate BCCHA's ethic and commitment to preserving wilderness character. This includes BCCHA's [Leave No Trace Stock Users Education Program](#). BCCHA 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 BCCHA, state and affiliate members, the U.S. Forest Service the *Leave No Trace*™ *Center for Outdoor Ethics*.

## **Cultural Significance of Recreational Stock Use**

The use of stock has played an important role in American culture. There is a long tradition of using pack and saddle stock not only in Olympic National Park but throughout the West. BCHA carries on this tradition in modern times, as does the robust and highly-respected pack stock program run by Olympic National Park that is used to 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.

We recognize the conflicting policy directive which NPS has been given under the 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 to occur for the use and enjoyment of present and future generations.

Our specific comments follow. They are limited primarily to the Visitor Use and Experience topic of the WSP preliminary draft alternatives.

## **Guiding Principle**

In preparing the WSP one of the guiding principles should be that horseback riding, packing and hiking 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 current park Wilderness (1988), the establishment of Olympic National Park (1938) and its predecessor, Mount Olympus National Monument (designated by Presidential Proclamation in 1909). In other words, horseback riding, packing and hiking have occurred in harmony within current boundaries of park Wilderness for well over a century.

Within the park's enabling legislation was the expressed intent that National Park Service was "to maintain the park for a principal use as a trail park." Clearly, backpacking as we know it today did not exist in 1938. The primary trail uses then were day hiking and overnight stock-assisted pack trips. It was not until the late 1960s/early 1970s that light-weight materials for backpacking were made available to mass markets and that backpacking became enjoyed by a broader public.

## **Purpose of the Plan**

According to the park's March 2014 newsletter announcing the preliminary draft alternatives:

The purpose of the wilderness stewardship plan is to guide the preservation, management, and use of the park's wilderness area as defined by the Wilderness Act of 1964. The overarching goal of the plan is to restore, protect, and enhance overall wilderness character of the Olympic Wilderness.

It is our understanding that the baseline datum against which all wilderness management activities will be compared is the date when Public Law 100-668, the "Washington Park Wilderness Act of 1988," was enacted by Congress. In other words, the goal of the WSP will be to "restore, protect, and enhance overall wilderness character of the Olympic Wilderness" using as a baseline those conditions that

existed in 1988, when Congress deemed 876,669 acres within the park as suitable for designation as Wilderness. We would appreciate clarification in the Draft WSP Plan if we have assumed incorrectly.

## Range of Alternatives

The preliminary draft alternatives, while noteworthy in many respects, **do not appear to represent a “reasonable range of alternatives” given the stated purpose for the WSP.** For example, Alternatives B and C appear inconsistent with several aspects of the park’s 2008 General Management Plan (GMP) and NPS policy, while Alternative D fails in our view to meet the stated objective to “provide visitors with a greater range of wilderness experiences.” For example, the 2008 GMP includes several proposals to retain or improve trails in park Wilderness, including the retention of all existing wilderness trailheads, retention of cultural landscapes including historic road/trails/sites, and rehabilitation of the Boulder Creek Trail to provide access to hikers and horseback riders. The GMP includes caveats, understandably, that facilities and trails could be modified or relocated as a result of management decisions related to “resource protection, restoration, visitor experience or increased visitation.” But Alternatives B and C appear to cut against the grain of the GMP’s intent to facilitate increased recreational use of the park and park Wilderness, presumably because recreational use levels have remained relatively low over the past decade.

Management direction—both stated and implied—in the 2008 GMP indicate there are few documented resource concerns or user conflicts associated with the existing park Wilderness trail system. Yet Alternatives B and C include significant reductions in the amount of trail miles available for recreational stock use. We are not clear on what basis the rationale for these reductions was formed.

Our understanding is that pack stock use by private parties has decreased substantially since park Wilderness was designated in 1988. It would follow that adverse or unacceptable impacts resulting from stock use on Wilderness trails would therefore be fewer at present than the WSP baseline datum of 1988. Further, we are not aware of Park Service documentation of “unacceptable impacts”—be it to water quality, cultural or natural resources—that can be attributed to use of horse and pack stock in park Wilderness. Thus, it appears to us that the proposed reduction in trail miles available to private stock users in WSP alternatives B and C are unwarranted and unjustifiable.

According to the park’s detailed table of Preliminary Draft Alternative Management Strategies (March 2014), there are about 570 miles of maintained trails within park Wilderness, of which only 343 miles (or 60%) are currently available for stock use. Based on our calculations, miles of trail available for stock use under the preliminary draft WSP alternatives would total as follows:

- Alternative A (No Action), with no change in current available trail miles;
- Alternative B, 250 miles (or a reduction of 27% in currently available trail miles for stock users);
- Alternative C, 185 miles (a 46% reduction in currently available trail miles for stock users); and
- Alternative D, 340 miles (essentially reflects status quo, with some modifications based on resource issues).

We fail to understand why such drastic reductions are proposed in the absence of data to demonstrate that the park is experiencing overuse or unacceptable impacts as a result of horse and stock use.

### **Need for Data on Recreational Use and Trends to Shape WSP Alternatives**

To better understand use trends and the context horse and stock use in park Wilderness, we recommend inclusion of a table in the draft WSP that outlines the following:

- Total trail miles available for hiking/backpacking and total trail miles available for private stock use in 1988 (or date closely matching Wilderness designation at Olympic National Park);
- Total trail miles currently available for hiking/backpacking and total trail miles available for private stock use;
- Total trail miles proposed to be available for hiking and total trail miles proposed to be available for private stock use for each WSP action alternative.

**We respectfully request that the draft WSP also include a table depicting overall use levels (i.e., annual visitation), per trail user group, beginning the year park Wilderness was established to the present date.** In other words, a table that depicts use levels by hikers, backpackers and recreational stock users from at least 1988 to present. The table will be useful to demonstrate trends and any notable changes in trail-related recreational activities within the past quarter-century.

It is our understanding that current visitation by private stock users is substantially less today than it was in the 1980s. **We would appreciate confirmation of that assumption with data presented in the draft WSP.** Moreover, we encourage park personnel to consider options to mitigating any real or perceived conflicts associated with recreational stock use in Wilderness prior to including alternatives in the draft WSP oriented toward outright trail closure. Doing so would appear consistent with NPS policy, as described below.

### **Alternatives B and C Appear to Violate NPS Policy as They Represent De Facto Closures to Stock Use**

As described previously, there appears to be no reasonable basis to support the restrictions proposed in Alternatives B and C relative to which trails remain available for recreational stock use. To structure WSP alternatives that include reductions/restrictions to hiking or stock use appears to us to represent a *de facto closure* that is neither warranted nor supportable.

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 through the current WSP, 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. 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).

Clearly the WSP has yet to follow the course recommended by NPS policies and, at present, there is no reasonable basis for placing limitations on recreational stock use in park Wilderness in the absence of compelling data on “unacceptable impacts” on park resources and visitor experiences resulting from such use. We recommend that action alternatives in the WSP that restrict hiking and stock use be amended to eliminate the de facto closures currently included in Alternatives B and C.

### **Use of Adaptive Management in Lieu of WSP Alternative-based Restrictions**

For those WSP alternatives that restrict either hiking/backpacking or recreational stock use, we encourage the Park Service to disclose the body of science being relied upon to form the basis of the proposed restrictions. **As an alternative to be included in the WSP, 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 WSP alternatives that begin with the assumption that stock use must be limited. Certainly, existing adaptive management frameworks like Limits of Acceptable Change (and the NPS version, Visitor Experience and Resource Protection) could be employed in the Olympic National Park WSP in order to lay a foundation for the collection of visitor data on potential user conflicts and management options to minimize or avoid it.

If social science literature is to be used to determine social carrying capacity, we would ask that the science is even-handed with respect to whose perceptions are being taken into account in making management decisions (i.e., hikers, horsemen or both). Recently, we have seen closures proposed for stock use in another national park based a narrowly-applied study from which the social preferences of backpackers and hikers was extrapolated. Rarely do we see social science that takes into account also the views and desired experience of traditional horsemen and stock users. **We hope and expect that any application of social carrying capacity in the WSP will be balanced in this regard.**

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 stock use in the park. Consequently, BCHA supports the development of additional alternative(s) that better meet the objective to “provide visitors with a greater range of wilderness experiences” within the confines of the Wilderness Act and NPS policy.

### **Proposal to Limit Stock Use to Designated Trails Must be Supported by Science**

We question the concept of limiting stock use to only designated trails below elevations of 3,500 feet. Horsemen largely understand the need for the current prohibition in off-trail travel above 3,500 feet in the park, as many of the subalpine and alpine environments enjoy short growing seasons and vegetation and soils are relatively sparse and fragile. However, current alternatives that would limit stock use only to designated trails appear both unwarranted and unpractical. We are unaware of a science-based rationale that would support the restriction, which at present is common to all action alternatives. We offer the following example of its perceived practicality.

A horse rider would be in violation of park rules for leaving the trail tread in order to water their horse in an adjacent creek. In addition, individuals or horse parties, which already are required to be small in size in park Wilderness (no more than 12 people and 8 head of stock), would not be allowed to step off the trail tread to enjoy a picnic lunch in the shade of an adjacent stand of trees. Any time a riding individual or party stopped for a break, it would be forced to remain occupying the trail and blocking it from other travelers (with the exception of designated campsites). A resting party would force other parties, be they on foot or on horseback, to venture off-trail in order to circumvent the resting party. This could result in some visitors feeling increasingly “crowded” in park Wilderness, particularly if they had to circumvent multiple resting stock parties on a given day. Perceptions of crowded conditions often result in greater negative impacts. Those negative impacts could then be cited to by anti-stock individuals or organizations as justification for further restricting stock use in the park.

Proposed Remedy: In non-camping situations, if stock users traveling below 3,500 feet elevation were allowed to temporarily move off the trail tread, say no more than 100 yards laterally, the potential for conflict and feelings of being crowded would largely be alleviated. In reality, it appears that off-trail activity is very limited and may bring, as described above, the added appearance of dispersing use—particularly in crowded trail corridors. We recommend the WSP alternatives include some iteration of this proposed remedy and that NPS horse and pack stock users be consulted as to its practicality in preserving wilderness character.

## Definition of “Self-Reliant Travel and Camping” used in Alternative B

We would appreciate a statement in the draft WSP regarding what is intended by the term in Alternative B regarding “self-reliant travel and camping.” We assume this has to do primarily with self-registration for entering the Wilderness and is not intended to imply a preference by the NPS for parties traveling on foot versus either on horseback or parties accompanied by commercial outfitters. Our understanding of the current *Interagency Strategy to Monitor Trends in Wilderness Character* (Landres, et al, 2008, *Keeping It Wild*) and its use of the term “self-reliance” pertains to **facilities and management restrictions** on visitor behavior that decrease self-reliant recreation and, in turn, could detract from visitors’ realization of outstanding opportunities for solitude or primitive and unconfined recreation. Please confirm our interpretation.

## A Policy of “No New Trails” is Neither Warranted or Justified at this Time

At present, all WSP action alternatives include a recommended policy of “no new trail construction” in park Wilderness. The table of Preliminary Draft Alternative Management Strategies (March 2014) states for Alternatives B, C and D: “There would not be an increase in the overall trail mileage maintained for hikers or stock users.” At a minimum, the proposal could be interpreted to contradict the stated intention of Alternative D that emphasizes “managing visitor use and recreation to provide visitors with a greater range of wilderness experiences.” At least any opportunities to consider new trail construction would be foreclosed.

A policy of “no new trails” unduly limits the ability of the Park Service to accommodate public demand for future trails even in those cases where new trail construction might preserve or enhance wilderness character. The ability of the public and future generations to access and enjoy Wilderness was a central tenant of the Wilderness Act. At Olympic National Park, trails serve as the arteries by which most people experience park Wilderness. We recognize that some trails may need to be relocated due to resource or wildlife habitat considerations, but the lack of currently available maintenance funding alone is not sufficient reason to permanently close a trail or trail system.

We request an alternative be included in the WSP that maintains the current trail system largely intact, allows for continued maintenance of bridges where it serves to promote visitor safety and protect resources, and which also allows consideration of new trails where warranted. This alternative should also include the option of bringing abandoned trails into the maintained trail system if and when resources become available to do so.

It’s our understanding that the park superintendent always retains discretion whether or not to construct new trails on a case-by-case basis, irrespective of a blanket policy whether or not to allow new trail construction. To institute a blanket policy of this type, as currently proposed for all WSP action alternatives, would preclude any option for new trail construction throughout the life of the plan—which if the relevance and applicability of the park’s 1982 Backcountry Management Plan is any indication, could mean a 30-year waiting period before the concept of new trail construction is revisited.

If indeed the intent of Alternative D is to “managing visitor use and recreation to provide visitors with a greater range of wilderness experiences,” a more reasonable approach in our view would be to include in the WSP an alternative regarding trails available for hiking and stock use that reflects the extent to which current trails were available for use at the time of wilderness designation (i.e., 1988).

In addition, it’s long been lamented among the equine community that park Wilderness beaches are not open for horseback riding. We understand there are existing limitations to providing for horse access to park beach areas, in terms of ready access to trailheads and trailhead facilities. But we respectfully request that a WSP alternative include the option of one or more such beach access opportunities if it might be accomplished in a way that preserves wilderness character. In our view, it would be wholly consistent with Alternative D and “providing a greater range of wilderness experiences” if the WSP were to explore the potential for such beach horse-riding opportunities.

## Conclusion

Thank you for this opportunity to submit public comments on WSP. We appreciate the efforts of park personnel to seek every opportunity to include the pack and saddle stock community in this and similar planning efforts. 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,



Randy Rasmussen

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*BCHA is proud to be a Wilderness50 member organization*

