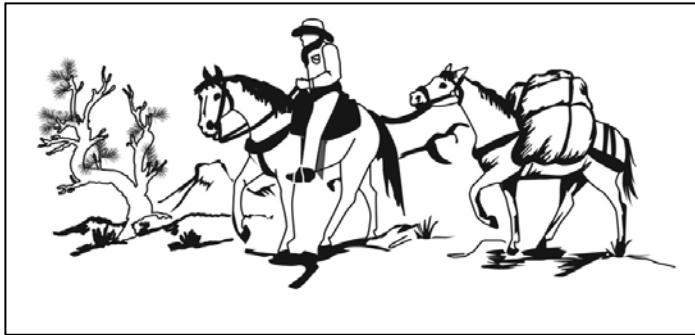


# *Back Country Horsemen of America*

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## A Message to Back Country Horsemen of America Members regarding the Forest Service Trails Classification Process

The Trails Classification development process marked a very difficult period between BCHA and our Forest Service partners. It was the first time, at the national level, that we have been unable to work out our differences without relying on the judicial process. Taking our disagreement to a higher level was not an easy or popular decision, but it was necessary. In a January 2006 meeting with the agency, both partners determined that we would not allow this disagreement to result in permanent damage to our relationship. We have been successful in accomplishing that goal. The Forest Service has listened to our concerns and the concerns of other trail users. I am pleased to announce that the Trails Classification System, as outlined in the interim final rule released October 16, 2008, has exceeded the expectation that I shared with you in your recent BCHA newsletter.

BCHA is becoming a very diverse organization. The needs of members in the eastern and mid-western states are often somewhat different than those in the western states. It has been a challenge to incorporate all of those viewpoints into one response to the Forest Service regarding the interim final. For that reason we have determined that it would be desirable to share the rationale for some of our comments:

**The Trail Classification System, as outlined in the interim rule, will not result in fewer miles of trail being managed for pack and saddle stock, or trails being managed to a lower standard.** An early concern with the new classification system was that the new trail classes did not correlate to the historical standards. As such, existing trails would be assigned a trail class with design parameters that were lower than those of the earlier way, secondary and mainline standards. This potentially would have meant that up to 50% of the trail system, which had historically been available to pack and saddle stock users, would have no longer been managed to standards that would accommodate that use. The agency has resolved that concern by increasing the parameters of TC-2 to those of a secondary trail, and the parameters of a TC-3 to approximate those of a mainline. There is no TC-1 or way trail opportunity for pack and saddle stock users, but under the new process, a trail that has pack and saddle stock as a managed use will be classified as a TC-2 or better.

This presented a dilemma for BCHA leadership. Do we push for an additional classification that would provide a minimally developed (TC-1) opportunity for pack and saddle stock users with design parameters that would approximate the old way trail, or do we accept that pack and saddle stock will be accommodated with fewer trail classes (**not** fewer miles of trail) than hikers and that way trails that had previously only accommodated saddle stock would be managed to a standard (TC-2) which would accommodate both pack and saddle stock?

We heard the concern from states that do not have an abundance of pack and saddle stock trail opportunities that increasing the clearing limits on some trails may conflict with the desires of hikers who prefer less developed trails. As such, the higher pack and saddle stock standards recommended for TC-2 might reduce the opportunity to get hiker trails opened to equestrians.

It became apparent to us during the field listening session that other user groups often do not understand why we need the clearing limits and development level that we're requesting. It was also apparent that they visualized a much heavier 'footprint' on the ground than was necessary to apply those parameters. I would encourage horsemen to seek every opportunity to meet with other user groups on the ground to improve this awareness. Clearing limits are only one element of the design parameters. A TC-1 trail is the lowest development scale available to trail managers. Normally it does not include tread construction, drainage structures and other features necessary to accommodate moderate or heavy use and might not be suitable to sustain regular equestrian use. If it is not necessary to have the increased clearing limits for TC-2 to accommodate the type of equestrian use that a trail receives, consider requesting, at the local or forest level, that the clearing limits be reduced in the trail management prescription. It was emphasized in the listening session that the parameters are guidelines. That flexibility is available to local managers, and the process of working out those compromises with other user groups and the Forest Service will strengthen our relationships.

We also heard from horsemen in the west that TC-1 hiker parameters (especially the 6' clearing height) would make trails that they have customarily used unusable in the future.

To minimize the risk that some pack and saddle stock trails currently classed as TC-2 (accessible by both pack and saddle stock) would be downgraded to TC-1 (only accessible by saddle stock), we chose not to request an additional Trail Class 1 opportunity specifically for pack and saddle stock. To meet the needs of some of our members, however, we are requesting that the clearing height for the TC-1 Hiker/Pedestrian trail be increased from 6' to 8' which would also better accommodate hikers who are taller than 6'. Although TC-1 would still not be designed for equestrians, occasional use could be accepted, and the clearing limits would minimally allow passage by horse and rider.

Another concern was that **the new classification system would give managers the discretion to change the user status or maintenance standard on a trail without an appropriate decision process** (including public involvement and effects analysis). The interim final is specific that "Trail management and use [are] based on the management intent for the trail, as determined by the applicable land management plan, applicable travel management decisions, trail-specific decisions, and other related direction. We also heard the concern that trail classes might be based on current condition, use level, or budget rather than upon land management plans or history of use. Although the appropriate instructions are contained in the training reference package that is available to all agency trail managers, they may easily be overlooked. We have asked for additional emphasis in the training package and directives stressing the 'requirement' to base TMOs and Trail Classes on land management decisions.

Currently, only 5% of the trail system has been classified as TC-1. That would appear to be a reasonable figure for those trails that are unsuitable for or unintended to be used by recreational stock users. From what we've been able to determine, the agency has been pretty honest with its implementation.

In an environment where increasingly more, and different types of, recreationists are competing for the same trail system and land base, it will be essential that horsemen be fully engaged in the planning

processes and in monitoring plan implementation to insure that trail management decisions are consistent with those plans. Horsemen can do that by:

1. Knowing the Trail Management Objectives and Trail Class for each trail (or trail segment) that is important to them. This information should be readily available on request from the local district ranger, land manager or trails managers. The Trails Classification System is relatively new, however, and it may take a few years to be fully implemented by all management units.
2. Check to see if uses that have historically been accommodated on the trail are included as “managed uses,” and if the most demanding use (often pack and saddle stock) is listed as the designed use (the designed use determines the design parameters used to guide construction and maintenance).
3. If you disagree with the TMO and Trail Class designation, request clarification regarding the planning decision used as a basis for that classification.
4. If the TMO and Trail Class are consistent with the applicable planning document, it will be necessary to change the planning document before the TMO and Trail Class can be changed. This can be done during a Forest Plan or Travel Plan revision, or by requesting a trail-specific analysis and decision. Expect to be required to provide substantial documentation showing that the trails management objective is inconsistent with law or policy, does not meet the needs of a large segment of the public, or is an unjustified departure from historical and customary methods of use.
5. If the TMO and Trail Class are not clearly attributable to or driven by a decision made through an applicable planning process, request (in writing) that it be changed.

Our response to the agency also included other concerns such as signing, bridges and use of native materials that were resolved by the interim final. We have not repeated that discussion in this paper. A copy of our response is available by contacting BCHA at 1-888-893-5161 or PO Box 1367, Graham, WA 98338-1367 or [Peg@backcountryhorse.com](mailto:Peg@backcountryhorse.com).

We have heard from some members that they would like us to help guide them in preparing their comments and to recommend specific wording that they should include in their response. Our Forest Service partners advise us that it is unnecessary for the states, chapters or individuals to repeat the concerns that we express from BCHA. We are a ‘grass roots’ organization, however, and I fully acknowledge your right to disagree with the position that BCHA has taken. If that is the case, or if we’ve neglected to include items that are of concern to you, I would encourage you to send your comments to the address referenced on the BCHA website “Alerts” ([backcountryhorse.com](http://www.fs.fed.us/recreation/)) or directly to <http://www.fs.fed.us/recreation/>.

Respectfully yours,



Michael Reedy  
BCHA Chair