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Olympic National Park GMP,  
NPS Denver Service Center - Planning  
P.O. Box 25287  
Denver, CO 80225

September 26, 2006

RE: Comments on Draft General Management Plan/EIS for the Olympic National Park

The Backcountry Horsemen of Washington is an organization comprised of recreational and pack stock users throughout the State of Washington who are dedicated to preserving our historical use of horses and mules on public lands. We do this not just as users, but as working volunteers who every day of the year can be found on our public trails packing tools, supplies, and crews; building puncheons, bridges, and turnpikes; repairing trails with Pulaskis, McLeods, and shovels; and cutting out brush and logs. There isn't a federal forest or national park in Washington State that hasn't had members of our volunteer organization investing time and labor into keeping their trails open for the citizens of our nation to enjoy.

Stock use on the Olympic National Park (ONP) dates back to a time before the park was conceived. Horses and mules were historically the means by which supplies and pioneers moved around the inland areas of Washington State. Trails were laid out through the Olympic Mountains for stock to pass on. Even the famous Press Expedition used saddle and pack stock to cross through the Olympics. Park Service and Forest Service holding facilities were built around the Olympic Peninsula to accommodate the horses and mules used by federal employees to steward the federal lands in the area, much of which came under Wilderness designation after Congress passed the Wilderness Act of 1964. Stock use continued after that time, and even today, the Olympic National Park maintains a federally funded pack string to perform trail maintenance throughout the ONP.

Development of the General Management Plan for the Olympic National Park is being done under the guidelines of the 1969 National Environmental Protection Act (NEPA) as well as Director's Order 12 of the National Park Service which specify a range of alternatives utilizing the NEPA process. NEPA is guided by several principles stated in the act including "3. Attain the widest range of beneficial uses of the environment without degradation, risk to health or safety, or other undesirable and unintended consequences." and "4. 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." (Title 1, Sec 101(b)). It is these principles, among others, which should guide the development of policies in the General Management Plan under NEPA.

Clearly, recognition of the role horses and mules have played in our state's history is a testament to the historic, cultural, and beneficial roles of stock to our society, particularly in the transporting of people and goods on public roads and trails, including those in the Olympic National Park. Our organization's successes are a testament that stock users educated with fundamental respect and appreciation for the well being of our environment, augmented by Leave No Trace principles, can effectively share trails with other users without causing any meaningful or even noticeable degradation of environmental elements. Due to the rugged nature of the Olympic National Park as well as limited access points from populated areas, stock use in the park is consistently low use - well below any volume levels that would cause undo stress from overuse. In return for providing trails for stock use, trails are much more likely to receive needed maintenance since tools, gravel, supplies, and people can be brought in using horses and mules. Ecosystem recovery time from low elevation grazing is relatively short due to the wet conditions in the Olympic Mountain area. In fact, many areas have had stock traffic for many decades, and yet in the spring, there is barely a sign that a horse has ever passed through.

There is no reason to limit stock use below existing levels. - NEPA concerns are well satisfied under existing use patterns. The only real issue is that trail standards for stock use require more maintenance and infrastructure than hiker-only traffic. This may be true, but the benefit of using stock for packing offsets to a large degree this issue. We do understand that due to environmental changes such as slides and flooding rivers, trails can suffer damage that may make them unsafe for load bearing horses and mules. Temporary closures to stock until repairs can be made may be necessary. However, we do not



support any efforts to permanently lower maintenance expectations by zoning away access rights to stock as a quick fix to financial woes where federally funded budgets consistently fall short of maintenance backlogs.

The General Management Plan proposes the establishment of Management Zones. For the most part, stock is prohibited in most of the zones with the exception of some of the trail zones and trailheads. Zoning is fundamentally a governmental tool to set boundaries for regulatory limitations. In the ONP wilderness, the bulk of the land area is to be placed in Primeval and Primitive Zones, both excluding stock. This does not appear to be a big issue currently since these areas are virtually void of trails and are not used by stock at present. However, zoning horses out means there never will be the opportunity for horses to utilize these areas should trails be built or circumstances change, which leaves the only backcountry access open to stock a prescribed subset of trails in the Wilderness Trail Zone.

Our requests are then:

- That any trails open to stock currently remain open to stock.
- That any horse camping areas currently open to stock remain open to stock, including those above 3,500 feet.
- That there be a zone adjustment system that will allow trails and/or roads to be relocated due to unstable conditions or natural events that necessitate relocation of trails and/or roads to more stable locations.
- That any existing structures used for stock camping, tie-ups, addressing trail hazards, or provided at parking areas, including the parking areas themselves, be kept available and open to repair and maintenance either by ONP staff or by volunteers.
- That the weed free certified feed requirement be implemented and enforced based on best management practices, availability of certified feed, and education of users.
- That Wilderness should be managed with a balance between preservation and public access under the principles set forth in the Wilderness act. Stock use on Wilderness trails, where appropriate, should remain open to all stock users, not just to special permitted Park Service approved pack strings or saddle horses.

It is well documented that our nation has been leaving the outdoors and moving into less physically active sports for their recreational pastimes. There are less backpackers on the trails, less hikers, and less horse riders than in prior generations. Our citizens are experiencing increased obesity, more health problems, and increased anxiety. The solution is to get them outdoors; get them back in touch with the magnificence of nature. But they can't get to the outdoors if land managers promulgate programs and management plans that continually keep the door closed. Keep the Wilderness open to visitors who come by foot – or by pack and saddle stock.

Sincerely,

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