



**BACK COUNTRY HORSEMEN  
OF IDAHO**  
P.O. BOX 513  
SALMON, IDAHO 83467

January XX, 2017

**Re: Comments – Hemingway-Boulders and White Cloud Wilderness Management Plan**

Back Country Horse of Idaho is a volunteer non-profit organization consisting of approximately 1,000 members who spend hours each year coordinating with Federal agencies and volunteering on Federal lands to improve the condition of trails and trailhead facilities and promote LNT ethics with other horsemen. Following are our comments.

**Standard #2172, Page 39**

The following are prohibited:

**Item a.** Having greater than 12 persons in a group.

**Response:** Current management direction is 20 persons. Is there a legitimate reason to propose new regulations? What are your findings that dictate such an action? If any of the unsupplied data show a valid scientific reason, we would be willing to discuss a lower number with the understanding that the special use permit process provides for exceptions.

**Item b.** Being in the area with a combined number of pack and saddle stock in excess of 14 animals.

**Response:** Current management direction is 25 head of stock. Is this area getting so heavily used that this is an issue? What are your findings that dictate such an action? If any of the unsupplied data show a valid scientific reason, we would be willing to discuss a lower number with the understanding that the special use permit process provides for exceptions.

**Item c.** Shortcutting trail switchbacks on foot or with pack and saddle stock.

**Response:** This is an existing CFR. Including this in the management plan is needless duplication.

**Item d.** Building, maintaining, attending, or using campfires above 9000' elevation, with the exception of Walker, Island, Upper and Lower Chamberlain (9,477' and 9,197') and Boorn Lakes.

**Response:** According to our members that use the area, this is reasonable.

**Item e.** Building, maintaining, attending, or using campfires within 200 yards of Swimm Lake.

**Response:** This is an existing CFR. Current CFR states 100 feet. What is the reason for such a large increase? Might there be a more reasonable distance? What is the empirical data that supports such a conclusion?

**Item f.** Tethering pack and saddle stock within 100 feet of springs, lakes, or streams.

**Response:**

**Item g.** Tying pack and saddle stock to live trees for periods longer than one hour.

**Response:**

**Item h.** Recreational grazing within 200 yards of lakes.

**Response:** This is new direction. There has to be a reason. What is the documented proof? Or is this an isolated instance of stock damage? Suggest a restriction on stock grazing with designated highline or corral areas around the immediate area of these lakes for a four year period, with a requirement to revisit the decision at the end of that period. This was used for Seven Lakes, Maude and Lottie Lakes in the Selway Bitterroot Wilderness by the USFS.

**Item i.** Depositing human waste within 100 feet of water, trails and campsites, and/or not burying waste before vacating the area.

**Response:** No objection to this direction.

**Item j.** Recreational stock use above Lodgepole Lake, above Quiet Lake, within Gunsight Creek, and within the Big Boulder drainage excluding Walker and Island Lakes.

**Response:** This is new direction. There has to be a reason. What is the supportive data that would suggest this is a valid direction? Is there an overuse issue ie: grazing with a downward trend towards overuse, recent rather than old tree bole and root damage due to stock tying etc.

Moreover the Wilderness Act of '64 talks to "a primitive or unconfined type of recreation experience" and Aldo Leopold spoke of Wilderness as "being first of all a means or perpetuating, in sport form the more virile and primitive skills in pioneering travel and subsistence...two are as American as the hickory tree...one of which is travel by pack train". Many skilled wilderness riders are just as desiring and needful of the opportunity to travel off trail over rocky high country if only to see with their equine partner what is on top of that rock ridge above the timber line. Therefore any blanket prohibition against the use of pack and/or saddle stock is not only discriminatory but counter to the very heart of one of the core precepts of the Wilderness Act.

**Trails Proposed to Remove From System Map.** Trail 7674, Trail 7684, Trail 7113

**Response:** Under Back Country Horsemen of America v. Johanns, 424 F.Supp.2d 89 (D.D.C., 2006) 424 F.Supp.2d 89 : Any changes to the USFS Trail System are required to be subjected to the NEPA process including full scoping for each trail that is proposed for removal from the system. Therefore a separate scoping effort must be conducted outside of this management plan if any trails are to be proposed for removal.

**Stock Closure Area Map (remove stock closure areas)**

**Response:** Are these existing stock closure areas or is this a closure you are proposing?

Back Country Horsemen of America has been called on many times to comment on and help work out solutions to stock related activities for Federal government agencies. In some states this has included an educational effort for a particular area, with the USFS enlisting BCH members to be their on-the-ground ambassadors. ie; stock people talking to stock people.

## **21151-Z1**

Zones Z2,Z3,Z4

21163-Z2 The highest trail standard in this zone is Class 2

21177-Z3 Signs may be present at trail junctions and, in rare cases, may be found elsewhere for resource protection.

21188-Z4 Signs may be present at trail junctions and may be infrequently used elsewhere for resource protection.

In closing, the USFS must show there is a substantiated reason for these new restrictions.

We look forward to the opportunity to sit down with you and discuss these issues in the near future.

Sincerely,

Bob Savage, State Chairman  
Back Country Horsemen of Idaho

cc: Don Saner, National Chairman  
Back Country Horsemen of America

cc: Randy Rasmussen, Director of Public  
Lands and Recreation, BCHA