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*Park:* Yellowstone National Park  
*Project:* Parkwide Commercial Stock Outfitter Concession Contracts/EA  
*Document:* Commercial Stock Outfitter Concession Contracts EA

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*Keep My Info Private:* No

Yellowstone's Compliance Office Attention: Commercial Stock Outfitter Concession Contracts EA P.O. Box 168 Yellowstone National Park, WY 82190

Superintendent Wenk:

Back Country Horsemen of America (BCHA) appreciates this opportunity to provide the following public comments on the draft EA, dated 8 November 2013, for Yellowstone National Park's "Commercial Stock Outfitter Concession Contracts."

We are pleased that the EA recognizes that..."stock historically facilitated access to Yellowstone's remote backcountry" (EA, p. 4) and that "commercial stock outfitters provide a service many visitors use while visiting the park and one that is often recognized as part of the Yellowstone experience" (EA, p. 71).

BCHA and our local chapters in Wyoming, Idaho, Montana and elsewhere are a group of dedicated men and women that work to preserve the historic use of trails for recreational pack and saddle stock. BCHA members perform public service activities for numerous land management agencies and are continually working to educate other members and the general public on "Leave No Trace" and "Gentle Use" methods of preserving and protecting the backcountry.

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. In the year 2012, BCHA volunteers documented in-kind contributions to the tune of approximately \$12.5 million for various projects and trail maintenance on federal, state and private lands throughout the U.S. Our members strive to stay current on relevant issues and to provide input to public land managers on management

plans and activities that affect access to public lands used by pack and saddle stock.

BCHA offers the following comments regarding the EA:

*Comments:*

- We understand the purpose and need of the Park's proposal "is to allow for and provide opportunities for visitors to experience the backcountry of Yellowstone National Park by guided saddle and pack stock trips and to protect the natural and cultural resources of the park" (EA, p. 8).
- BCHA appreciates the services offered by commercial stock outfitters in Yellowstone and other national parks and support outfitters who make every effort to "Tread Lightly."
- We support the concepts contained in Alternatives B and C of the EA, and understand that the Park Service does not intend to eliminate or otherwise unduly restrict recreational stock use within Yellowstone's backcountry (i.e., Alternative A, the "No Action Alternative").
- Both Alternatives B and C continue commercial stock outfitter use at current levels, yet differ primarily in that the NPS would issue 10-year commercial saddle and pack contracts (under Alternative B) or choose to retain flexibility in the terms and conditions of the contracts based on the results of resource monitoring data and adaptive management decisions (Alternative C).
- As private users of recreational saddle and pack stock, we recognize the importance of minimizing resource damage on our public lands and support the agency's need to apply peer-reviewed science in the monitoring of resource trends and conditions.
- Thank you for recognizing previous public comments submitted by members of Back Country Horsemen of America regarding "the significant role of stock use in visitor enjoyment and accessibility, stock use as a traditional part of the park's history, and (our) opposition to restrictions or limits on day rides or backcountry use" (EA, p. 10).
- We feel the EA has fairly and adequately addressed these concerns.

As stated in our public scoping comments dated 15 April 2013, we feel confident the Park has entered this EA process for the right reasons, including a desire to ensure that current and future commercial stock outfitter concession contracts are adequately addressed via the National Environmental Policy Act. We view this to be a wise and proactive move in order to minimize the pitfalls and potential legal challenges that recently have befallen other, high-profile units of the National Park System.

Thank you for this opportunity to provide these comments.

Sincerely, Randy Rasmussen, Advisor for Public Lands & Recreation

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