



Thomas Tidwell, Chef
USDA Forest Service
1400 Independence Ave, SW
Washington, DC 20250

Re: Forest Service Planning Rule

Dear Chef Tidwell:

The American Horse Council (AHC) appreciates the opportunity to comment on the U. S. Forest Service's proposed planning rule.

The American Horse Council (AHC) is a Washington-based association that represents the equestrian community. The AHC includes individual members and over 120 equine organizations that represent virtually every facet of the equestrian community, including horse owners, recreational riders, competitive associations, breeders, veterinarians, race tracks, horse shows, trainers, rodeos, farriers, breed registries, horsemen's associations, state horse councils, and commercial suppliers.

The conservation, management, and use of America's National Forest System (NFS) is extremely important to the equestrian community. Hundreds of thousands of Americans of all ages use horses and pack stock to enjoy America's NFS. Riding provides Americans with a link to the past and a chance to see and experience America's great public lands from horseback just as early explorers and settlers did. Equestrian activities in the NFS also play an important roll in connecting young Americans with the outdoors. Additionally, many disabled individuals use horses to see and enjoy parts of the NFS that would otherwise be inaccessible to them.

The equestrian community recognizes its responsibility to treat our nation's public lands with respect. Many members of the equestrian community have been leaders in the promotion and use of the "leave no trace" ethic on public lands. This community has a deep commitment to outdoor recreation and believes that recreational riding and stock use is a sustainable, fundamental and legitimate use of our country's NFS. Whether they are trail riders, competitive riders, packers, outfitters or saddle and pack-stock users, they recognize the overriding need for the responsible use and wise management of our national forest lands.

The AHC would like to applaud the Forest Service for the transparent and inclusive process that has been used to formulate this proposed planning rule. Furthermore, the AHC is very pleased the Forest Service recognizes the importance of recreation in the NFS. Broadly

speaking the AHC is pleased with the rule and sees it as vast improvement over the 1982 rule. However, there are some components we believe could be improved.

The AHC believes increased requirements for public involvement and collaboration throughout all stages of the forest planning process are very important and will ultimately lead to better forest plans. However, in order for the new public participation requirement to be effective the Forest Service must make certain stakeholders are informed of these opportunities. Reaching stakeholders early is particularly important given that the proposed pre-decisional administrative review process requires prior participation in the process to file any objection. We understand the proposed rule requires land managers be proactive in engaging the public and use “contemporary tools, such as the internet,” however the AHC worries that may not be adequate.

The AHC recommends adding a requirement that national organizations with which the Forest Service has memorandums of understanding (MOU) be notified when any new forest plan revision or amendment is undertaken. Such a requirement would allow national organizations to help the Forest Service reach all interested stakeholders. The AHC also suggests the responsible official for any forest plan be directed to inform any local groups that perform volunteer work in the concerned forest be notified as well.

The AHC is pleased the Forest Service has made recreation an important component of the planning rule. We cannot overstate the importance of recreation not only to individual recreational riders but also as a driver of economic growth in the communities that abut our national forests and grasslands throughout the country. Recreational riding alone contributes \$32 billion a year to the economy and contributes to the employment of nearly 437,000 Americans nationwide. It is absolutely vital the new planning rule promote and protect equestrian activists in our national forests.

The AHC recognizes the Forest Service is seeking to create a planning rule that will have the flexibility to remain viable well into the future and will be applicable to the diverse range of Forest Service managed land. However, we believe it would be desirable for the Forest Service to include definitive goals for recreation in the final planning rule.

The AHC requests the Forest Service consider including the four goals identified in the Forest Services’ own “A Framework for Sustainable Recreation” in the planning rule to make certain all individual forest rules meet the agencies goals to:

- Provide a diverse range of quality natural and cultural resource based recreation opportunities in partnership with people and communities.
- Protect the natural, cultural, and scenic environment for present and future generations to enjoy.
- Partner with public and private recreation benefit providers that together we meet public needs and expectations.
- Perform and plan by implementing systems and processes to ensure: effective decisions, sound investments, and accountability; collaborative approaches to

integrated solutions across the landscape; and enhanced professionalism of our workforce.”

Additionally, the proposed planning rule requires forest plans provide for the protection of Designated Wilderness areas. However, the planning rule fails to address the recreational mandate for wilderness areas. The Wilderness Act specifies that “wilderness areas shall be devoted to the public purposes of recreational, scenic, scientific, educational, conservation, and historical use.”

The AHC requests that the planning rule be modified to reflect the recreational purpose of wilderness. The planning rule should require that forest plans provide for the use and enjoyment of the American people and the protection of Designated Wilderness areas.

The AHC supports the new pre-decisional administrative review process. However, the AHC is concerned the 30 day window to file an objection is too short a period for stakeholders to be notified the objection period is open, review the forest plan, collect all relevant materials and file an objection.

The AHC requests the Forest Service make this a 90 day objection period to give stakeholders an adequate amount of time to file an objection. We do not believe this is an overly burdensome request since most forest plans are expected to be in effect for at least 15 years.

Lastly, the proposed planning rule directs forest plans to take into consideration culture and heritage resources. The AHC would like to take this opportunity to remind the Forest Service that the horse has played a distinctive roll in the history and culture of America. The horse has provided transport for every generation of Americans. It has played an important role in the exploration and settlement of the continent. The image of the cowboy on his horse is iconically American. The horse was and is an integral part of the culture and everyday lives of Native American tribes in the west. The AHC considers equestrian activities in our national forest to be not only a recreational pursuit but a distinctive part of American culture and history that deserves to be recognized and protected.

We hope as the Forest Service continues the rulemaking process it will be mindful of the millions of equestrians who use our national forests. They are a driver of economic growth in many communities and play an important role protecting and connecting Americans of all ages with the outdoors. The equestrian community is part of the historic legacy of America and riding on America’s national forests continues to play an important roll in the lives of many Americans and their families today.

The AHC and the equestrian community looks forward to working with the Forest Service and all stakeholders to preserve our national forests and ensure their enjoyment by future generations of Americans.

Sincerely,

A handwritten signature in blue ink that reads "James J. Hickey, Jr." with a stylized flourish at the end.

James J. Hickey, Jr.
President