

AHC's Invasive Plant Draft Environmental Impact Statement

Introduction

The American Horse Council appreciates the opportunity to comment on the July 2004 Draft Environmental Impact Statement (DEIS) for the proposed Pacific Northwest Region Invasive Plants Program. The stated purpose of the DEIS is to improve the ability of the Forest Service (ES) to manage and prevent the introduction of invasive plants onto FS lands.

The introduction of invasive plants onto Forest Service (FS) lands is a serious problem and should be dealt with aggressively in an appropriate and efficient manner. Nonetheless, the AHC respectfully questions whether the proposals, including the Proposed Action supported by the ES in the DEIS, that specifically affect pack and saddle stock are warranted, fair and based on science. Indeed, the effect of some may be dangerous to horses.

The AHC the Recreational Horse Community

The AHC is a Washington-based association that represents the horse industry before Congress and the federal regulatory agencies. The AHC is made up of 150 equine organizations representing all horse breeds and virtually every facet of the horse industry, including horse owners, breeders, veterinarians, farriers, breed registries, horsemen's associations,

horse shows, rodeos, commercial suppliers, recreational riders and state horse councils.

According to the study, *The National Economic Impact of the Horse Industry in the United States*, done by Barents Group LLC, the recreational horse industry in the U.S. has a total economic impact of \$23.8 billion, supports 317,000 jobs and involves 4.3 million people. In terms of horses and participants it is the largest segment of the horse industry.

The recreational riding community recognizes its responsibilities to treat our forest lands with respect. This community has a deep commitment to outdoor recreation and believes that recreation is a fundamental and legitimate use of our country's forest lands. Whether they are trail riders, competitive riders, packers, outfitters or saddle-stock users, they recognize the overriding need for the responsible use and wise management of our natural resources.

The AHC and its organizational and individual members realize that we have a responsibility to protect and maintain our historical heritage and traditions. Horsepower built this nation. Horses provided Americans with transportation for over 250 years. They moved this country from east to west. The historic use of saddle and pack stock within areas

now managed by the FS can be

traced back to the Corps of Discovery commanded by Lewis and Clark in 1804-06. Native-American Tribes used horses for many purposes. Mountain men, pioneers, ranchers, hunters, and outdoorsmen have utilized saddle and pack stock in these areas.

Riders are concerned that more and more horses seem to be targets for exclusion from public lands, whether directly through the closing of public areas or trails or indirectly through the introduction of new and burdensome regulations or requirements that effectively limit opportunities to ride. Our members are concerned that the needs and opinions of the recreational trail rider often seem to be often ignored in national forests.

Specific Comments

The DEIS outlines several alternatives that could be adopted by FS to deal with invasive weeds. Several result in the application of requirements not presently imposed on pack and saddle stock. The primary result of the various proposals is that recreational riders may be required to use and bring weed-free feed to enter some or all National Forest lands.

The expressed alternative favored by FS would require the use of weed-free feed in all Wilderness Areas, trailheads and staging areas. Obviously, this would have a

substantial affect on riders, the overwhelming majority of whom must use trailheads and staging areas to get to federal lands. The DEIS admits that this would increase the cost of using pack and saddle stock on ES lands and restrict recreationists' ability to enter certain federal lands.

The horse industry recognizes that any invasive plant problem is a serious concern. But we wonder where the bases for the proposed requirements on weed-free feed for horses is explained in the DEIS. The DEIS cites insufficient scientific studies, treatises or papers to support the proposed, new far-reaching weed-free feed requirements in the DEIS applicable to saddle and pack stock use. Without some documentation of scientific information based on either designed experiments or observational data collected in a scientifically-disciplined manner, the ES has nonetheless characterized the use of saddle and pack stock as a significant contributor to the spread of invasive plants. Indeed even the items in the DEIS Appendix conclude that the existing science on the role of ungulates in invasive plant spread is inconclusive. But still the DEIS suggests that saddle and pack stock are significant contributors to the invasive weed problem.

For these reasons we oppose any requirement that weed-free feed be mandated in areas covered by the DEIS.

In light of actions in other public lands with respect to horses, we must wonder whether the drafters of the DEIS have a bias against the recreational use of saddle and pack stock on wild lands and Wilderness Areas and have attempted to erect a straw man to reach what are effectively exclusionary conclusions and recommendations.

The ES should provide sound scientific bases in the DEIS that document increased occurrences and rates of spread of invasive plants that are statistically related to the occurrence of, and intensity of use of, saddle and pack stock. Until the ES can make this showing, additional regulations and/or requirements on horses regarding the use of weed-free feed should not be adopted.

Increased Costs to All

Requiring horse owners to use weed-free feed will clearly increase the cost of using saddle and pack stock because such feed is more expensive to produce and distribution locations are limited, resulting in additional purchase and transportation costs to the riders and stock providers.

Under the Preferred Alternative in the DEIS, the amount of area that will be impacted by the weed-free standard is substantial. Although it is confined to Wilderness Areas, it will result in nearly a 500% increase in the acreage involved from the current approximately 1 million acres to 4.6 million acres. This

will result in increased costs to the users and will likely dissuade some amount of recreational saddle and pack stock use.

This additional requirement will also increase the cost to the ES for enforcement of the weed-free feed standards.

Unforeseen Results for Horses in Feed Changes

Another potential effect of requiring horses to use weed-free feed is not even considered. Nowhere in the DEIS is the potential result of changing horses' feed to weed-free feed discussed. But there is great concern in the horse industry that changing a horse's feed just before an excursion to ES land for a trail ride could harm the horse.

Many veterinarians are concerned that any feed change to feeds that are certified as weed-free could put horses at risk for colic. Colic is a serious gastrointestinal disorder of horses which can be debilitating or fatal to horses. This could be a real health problem to horses for even a day ride, much less a multiple-night back-country excursion.

Conclusion

The AHC appreciates the opportunity to submit these comments on the DEIS. We would be happy to meet with anyone if you have any questions or would like to discuss these points further.

