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Submitted via the CARA Online Portal:

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Nantahala-Pisgah Forest Plan Revision Team
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RE: Public Comments, Nantahala and Pisgah National Forests Plan Revision Draft

Forest Planning Team:

On behalf of the Back Country Horsemen of North Carolina (BCH of NC), with support from the Back Country Horsemen of America, we wish to thank you for providing such an in-depth plan revision draft. The years of work and dedication to work through all the dimensions of forest planning is staggering in scope.

As you know, BCH of NC is a service organization, working with public land managers "from Murphy to Manteo" with chapters across the state. Our members engage in trail maintenance, as well as advocate for equestrian access in National Forests, National Parks, State Parks and State Forests throughout NC. We are highly engaged in helping to find the balance between our interests and a healthy forest. As such, representatives from our group have served on the Nantahala-Pisgah Forest Partnership (the Partnership) as well as the Nantahala-Pisgah Stakeholder's Forum (the Forum) since the beginnings of each groups' efforts.

We would like to thank Michelle, Allen and Alice directly for your engagement in our collaborative efforts. A special "thank you" goes out to Erik Crews for his many hours of meaningful dialog with our group as well jointly with the bike group and the whole recreation group. It was extremely helpful for us to understand the hopes of the Plan revision in regards to sustainable recreation and to develop what we hope is constructive feedback on how we can best contribute to the best path forward for all.

The Partnership recently reached a major milestone in crafting and signing consensus recommendations for improving the Draft Forest Plan, and we fully support those recommendations, which were submitted as comments on the Draft Plan, dated June 25, 2020. We have crafted our organizational comments to be complementary and supplementary to the Partnership recommendations, with the interests of our many partners in mind.

Specifically, we would like the Forest Service plan team to consider the following items:

- Restricting horses to designated trails should happen only after:
 - Geographic-specific milestones are developed that reflect visitor needs and demand, and
 - A collaborative trail planning process is completed for each Geographic Area, with the goal to identify high value routes and bring them into the formal trail system.

Rationale: Without these efforts, we feel frustration from unsatisfied need will result in “rogue” travel and maintenance that could cause more resource damage. This “carrot vs stick” method will result in engagement of a highly motivated workforce of volunteers.

- New or additional horse trail mileage should not be prohibited in Wilderness or Proposed Wilderness, as proposed in the draft Forest Plan.

Rationale: With the understanding that any new trail proposal, regardless of the management area, must be ecologically, financially and socially sustainable, prohibition of a recognized user of Wilderness is not necessary and would set a bad precedence nationally.

- The Standard REC-S-07 should specifically state that horse camping should be given priority over non equestrian campers in designated equestrian camps.

Rationale: Currently, there are six horse camps across the entire N-P forests, providing around 30 sites for equestrians but available to all user groups. Our organization would be glad to provide ideas on how to get that accomplished.

- The Plan should not include a “cap” on the total mileage on new trail proposals, particularly when there is a commitment from established volunteer organizations and where trail proposals are shown to be financially, socially and ecologically sustainable.

Rationale: Progress toward addressing the backlog of trail maintenance in the trail complex that includes the proposed new trails should be used as an incentive for positively considering the proposals.

- A minimum of 20 new trail loop proposals (vs 10, as stated in REC-O-08) should be considered during the life of the Plan. Projects currently underway would not count toward the minimum number.

Rationale: There currently exists a lack of designated trail systems forest-wide. Yet, at present, there are over ten new loop proposals among ongoing projects within the Eastern Escarpment. We hope those projects won't be delayed in order to “count” during the new Plan.

- The Plan should include among its standards and guidelines that trail user groups must be notified in advance if forest management activities or streamside mitigation efforts are being planned that could impact their trails.

Rationale: Examples have been cited at the project level that fixing a stream crossing on a hike/bike/horse trail caused it to become inaccessible to horses, forcing the creation of an unauthorized reroute, which likely resulted in added impact water quality.

- Holders of Special Use Permits (SUPs) for trails-related events should be required to notify the public at least two weeks in advance of their event and the locations (trails, trailheads and parking areas) that would be affected. A monitoring plan should be enacted by the Forest Service to measure the impact of these events. In addition, requests for trails-related events and competitions should be granted only after securing a Performance Bond to mitigate potential damage to the affected trail system.

Rationale: Measures are needed to reduce user conflict and resource damage associated with SUP recreation events. Although the Code of Federal Regulations states that such requests must “not unreasonably conflict or interfere with....authorized existing uses...,” there currently is no uniform requirement by the National Forests of NC to inform the public about a special event, nor is there any requirement to collect a bond or deposit in case of damage caused during the event.

- Trail mileage in the Eastern Escarpment should be increased to a minimum of 49 miles to meet user demand, increasing to 25 percent of the total trail mileage in the Geographic Area.

Rationale: There currently exists a non-designated trail network that is legally used by equestrians in the Eastern Escarpment and totals 39 miles. The current designated miles are not meeting the need in this area as only one trail out of 59 are designated for horse use (2.5 miles out of 157 miles, or 1 percent). For comparison, the Pisgah Ledge Geographic Area has 76 miles out of 277 (28 percent) designated for horse use.

- We recommend adding to the Goal REC-G-07 the following: *“Motorized trail systems that are closed seasonally to motorized use should be made available to horseback riding, bicycling and hiking during those times.”*

Rationale: We support the goal that “Motorized trails should not have mixed use with equestrians, and bikes or hiking is not encouraged.” Yet there appears to be times when demand for non-motorized recreational activities could be met, in part, via use of motorized trails during periods when trails are closed to motorized use.

- Include a provision in the Forest Plan that directs the development of equestrian campgrounds in the Eastern Escarpment.

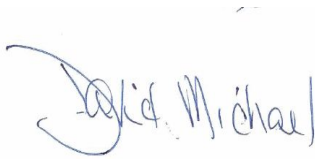
Rationale: We support the Goal EE-GLS-07 : “Respond to increasing demands for sustainable mountain biking and horseback riding.” Yet, at present, there are no overnight accommodations on the Eastern Escarpment in the Forest for equestrians. Providing camps would help to make Eastern Escarpment more accessible to those traveling longer distances. We encourage the Forest Service to partner with willing user groups to reopen Boone Fork Camp and consider camping at Woods Mountain and Old Fort in the Black Mountains.

- Goal BLM-GLS-12 of the Draft Forest Plan Revision states “Partner with Mt. Mitchell State Park to ensure recreation linkages and high-quality conservation education opportunities.” We recommend adding the following to the end: “*and access for trail management and parking.*”

Rationale: This could lead to a solution for the long-needed parking access for equestrians to the Buncombe Horse Range Trail.

The Back Country Horsemen stand ready to assist the Forest Service and District staff to help implement these requests. Thank you for your consideration and for your dedication to improving recreational opportunities throughout the Nantahala-Pisgah National Forest.

Sincerely,



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