July 27, 2024

U. S. Forest Service

Mena-Oden District Ranger

Attention: Mena Trails,

1603 Hwy 71 North

Mena, AR, 71953

RE: project #63649

Thank you for the opportunity to comment on this proposal on behalf of the Arkansas Back Country Horsemen, a Chapter of Back Country Horsemen of America.

The Mena project has been a proposal for many years. Now, aspects of the project are beginning to surface which are of concern to equestrian and other outdoor enthusiasts. These include:

* Massive disruption of the natural environment in and around the project area. Mena is well known for its natural beauty and draws many visitors each year to view and enjoy the beautiful hills, winding roads and trails, and magnificent fall leaf displays. The solitude, quiet woods and deep dark night time skies attract nature lovers and recreationists to hike, horseback ride, hunt and enjoy scenic views of the Ouachita Mountains. These scenic natural areas are now proposed to see installation not only of natural surfaced trails, but also mechanical “Disney World” like ski-lifts to accommodate bikers (motorized e-bikes) and their bikes to area previously accommodating non-motorized users. Installation of which would disrupt natural scenery and the quiet spaces so loved through the centuries. The EA does a poor job of disclosing the impact to the natural setting (scenery) of the mountain.
* Assurances have always been given that the new development would be “multi-use”. However, now only mountain bikers, e-bikers and hikers will be allowed on the trails. However, multiple sources testify to the lack of suitability for bikes/e-bikes and hikers on the shared trails. No consideration has been given to equestrian users, who are numerous in the area. In fact, they are summarily dismissed at least two places in the draft EA. The EA does not disclose whether or not equestrians might be entirely displaced from the project area, while clearly stating that horseback use would be prohibited on the new trail system. There are a number of trails, campsites and trail systems in this general area that accommodate equestrian uses. These include Black Fork Wilderness trails, Fourche Mountain, Winding Stair, Robbers Cave, Idle Nook, 8 West, Viles Branch and others. These traditional users are well established and provide a significant (if not recognized) economic benefit to the local area and across the State. This EA does not address the displacement of equestrian users in and around the area. This will happen due to the sheer numbers of visitors brought to the area, and commonly seen “trail poaching” by other users who wish to use and overtake commonly used traditional routes used and maintained by the equestrian community.
* The EA fails to address this displacement. There should be an analysis of the number of horse trail miles within the proposed area and nearby the project area that would be displaced and disrupted by this development, as well as that associated cost.
* This project--at its core--represents a public lands giveaway to the state of some 8,832 acres of National Forest System lands. The giveaway would come via a Special Use Permit issued to Arkansas State Parks. Once the state builds the visitors lodge, ski lifts, etc., it's highly unlikely the FS would ever terminate the SUP. The use of a Special Use Permit to replace USFS regulatory management with that of Arkansas State Parks seems especially significant, given that the use of e-bikes is more accepted in State Park areas. USFS regulations maintain that “a motor is a motor” and denies motorized access in non-motorized areas. Arkansas State Parks, on the other hand, allows e-bike access in areas protected by existing forest plan.
* The recent trend toward bikes and motorized use (ebikes) of recreational vehicles is well recognized. While considered a popular “fad” by many, this mode of transportation has served up economic benefit for some, and will no doubt continue. These recreationists, in fact, do deserve to have a place to enjoy their sport, however, not the State’s prime, natural areas. This example of recreation available to only those who, though foundations or well financed interests, can bear the costs of NEPA compliance, construction, management and regulation of sensitive environmental areas seems improper. The lasting effect of this type development on the natural, social, cultural environment will be permanent for this area. This cost should not be underestimated. Once these natural areas and their traditional historic uses are supplanted, they can never be recovered.
* The EA does not address specific mitigation that would occur in compensation for the environmental destruction caused by this project, and, for the loss of usage of these public lands by other historic users. The sheer size of this project demands that these items be addressed.

We request selection of Alternative 1 – no action, or in the least, Alternative 4 with no lifts and a lesser effect of displacement of existing users, and destruction of the natural resource.

Jacque Alexander, Arkansas Back Country Horsemen