



# BACK COUNTRY HORSEMEN OF VIRGINIA

[www.bchva.org](http://www.bchva.org)

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7/29/2024

To:  
Joby Timm- Forest Supervisor George Washington /Jefferson National Forest  
Jesse Howard- Project Coordinator  
and Interested Parties

Re: Southern Appalachian Watershed Resiliency Project

I am writing on behalf of Back Country Horsemen of America (BCHA) chapters in Virginia, collectively known as Back Country Horsemen of Virginia (BCHVA). Our mission statement is to “perpetuate the commonsense use and enjoyment of horses in the back country and Wilderness” while we, as volunteers “educate, encourage and solicit active participation” in the use of them, for generations to come. In 2023 Virginia chapters contributed 4,175 volunteer hours valued at \$257,364.52 to the George Washington/Jefferson National Forest (GWJNF) for trail projects and trail maintenance. Thank you for giving the public a chance to engage in this meaningful project. We fully support the goals and objectives within the scoping letter and SAARTAB report to improve watershed conditions, manage flood risks, safeguard water quality, preserve biodiversity, and enhance recreational and aesthetic values, and we understand the current threats to our natural systems. BCHVA chapters are thankful for the opportunity to engage in the process and look forward to interacting with agency personnel, as well as other organizations as this project moves forward.

We have read the materials, including listening to the 7/17 webinar, and we are concerned that there is little or no mention of the affects of the project on recreational access and use, in particular the effect the proposal might have in terms of preserving historic and ongoing horseback use throughout this and other forests. We ask that the project Environmental Assessment (EA) address these issues in detail.

The GWJNF as well as other forests in the project area have yet to adopt recreation management plans that include formal designation of trails for public recreational use. Also, as in the GWJNF and other forests, many important routes are non-system trails, also known as legacy trails, that the Forest Service has yet to recognize and designate as official system trails, even though many are in better condition and more sustainable than the official trails. Many of the system trails are poorly, if at all, designed and many are situated on fall lines, ridge lines and cross numerous drainages. They are eroded and contributing to stream sedimentation. BCHVA chapters actively participate in the maintenance and construction of safe and sustainable trails and thus stand ready to assist as this project moves forward.

The Categorical Exclusion designation can be both a benefit and a hinderance in the project. Although a CE can speed up the process, which will help us volunteers on the ground to get projects implemented in a timely manner, if parties are not fully engaged the lack of a public process can leave the less involved, or less informed, without a voice. As such, we request that unit-level forest staff work with local BCH chapters and other trail users to identify, in advance, existing system, non-system trails and forest roads in watersheds subject to proposed restoration activity. We view the region-wide watershed resiliency projects as an opportunity for our forest and others to better understand the needs and desires of the recreation community and how the community might assist and improve the efficacy of these projects. In addition to regular maintenance, Virginia chapters have proposed, funded and implemented or assisted in numerous sustainability projects across the forest and are ready to offer technical and physical assistance as watershed projects arise.

In addition, our chapters would like to continue or enter into dialogue with local forest staff to communicate our desires, needs and how our volunteers might reinforce our commitment to improving legacy trails via information sharing, digitizing routes in the field, documenting problematic drainage crossings, and/or conducting rudimentary trail sustainability assessments and water quality monitoring as well as assisting in trail system improvements that will bring our trails to a more sustainable level for years to come.

Our chapter's point of contact for the Southern Appalachian Watershed Resiliency Project is- Nancy Sluys and can be reached by phone, text or email at 336-325-8886, [minglewood@surrey.net](mailto:minglewood@surrey.net)

Thank you for considering these comments,  
Sincerely, Kerry Beard  
President- Back Country Horsemen of Virginia  
[www.bchva.org](http://www.bchva.org)