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Title: President

Comments: Please see the attached file for comments from the Back Country Horsemen of the Virginia Highlands

LETTER TEXT:

Hi Folks,

The Back Country Horsemen of the Virginia Highlands are forest partners dedicated to the maintenance and preservation of the multi-use trails in the Mount Rogers NRA. We have read the Environmental Assessment and have the following comments, observations and suggestions that have been gathered from our members. In general, our organization approves of the proposed action as we understand the need for forest management to achieve a healthy balance in the forest as long as there is accountability and public involvement. We feel that your team has done a good job of that so far and has put together a detailed and well thought out document for the most part. We recognize that attention has been paid to things such as aesthetics and trail buffers and appreciate that. Being that this project is superimposed over a recreation area poses many challenges on the ground and with the public. We welcome this opportunity to engage in the planning process so that future misunderstanding between the Forest Service and the public can be avoided.

We especially appreciate the time and care you all have taken to help the community understand the bigger picture. Since BCHVH has a narrow focus in our mission we will only be commenting on the trails and the project[rsquo]s affect on them and their users. We hope that the public will speak up with their concerns and suggestions in other areas as well.

I will go through the trails in order that they are listed on the chart in the Recreation Report that we compared with the project maps. I would like to note that the maps do not clearly show the designated trail system (barely discernible grey dotted line and not clearly labeled) and in some cases designated system trails are not even shown making accuracy difficult. Also, on some trails like the Moore Trail near Shiloh and Yellow Branch Trail it is showing old data that does not indicate current rerouted trail location accurately (these reroutes were done over 20 years ago). The section of the Virginia Highlands Horse Trail between 602 and Shiloh and the Ewing Mountain Trail are not even on the map. It also does not show exactly where haul roads will run concurrent with trails and the descriptions in text are vague, making it a guessing game for us and the public to navigate.

Also the chart in the Recreation Report that shows use level is inaccurate as to what is actually happening on the ground and needs to be updated. We would like to see updated maps that better show the trail system and its relationship to the project areas and to offer help in updating any other documents that pertain to trail use. All that being said here are the following observations and suggestions:

Virginia Highlands Horse Trail(FST 337) -

C-4970, S39, S3, S22- The map does not show the route for FST337 through this area so it is difficult to see how that trail will be impacted. Since this area is included in our 2021 Trail Rehab Project that has been funded by a NWSA Trail Stewardship Grant we will need to closely work with your team to identify any impact on this section of FST337 between SR602 and the intersection of VHHT/Mike[rsquo]s Gap near Shiloh. We would like to avoid any disruption of the rehabilitated trail bed and/or develop an alternative if need be. Our work on this project will

be completed by the end of 2021.

C-4987, S11 - This appears to be the area that is called Hugo's Meadow. BCHVH conducted a restoration project there in 2020, clearing and restoring the overgrown, neglected meadow and replacing an interpretive sign that had rotted away. This meadow is very special to trail users and the public. We hope that if there is a loading platform planned for that area that it not be visible from the trail or meadow and that the haul road through the meadow be aligned in such a way as to be pleasing to the eye when the work is ongoing and after it is finished.

C-4984, S3- We see no obvious issues in this area but wanted to point out an old spring box that feeds into a water tub by the side of the trail that is very important to trail riders to water their horses. This lies just to the west of this section on the Virginia Highlands Horse Trail.

C-4979, S22- This area of Shelterwood With Reserves treatment would be a great place to open some really nice views from the trail.

Yellow Branch Trail(FST 310)-

C-4974, S29- It is unclear how this treatment will affect the Yellow Branch Trail (FST 310) because the trail data on your reference map is outdated and does not show the current trail route. Since it is stated that skid trails will cross FST310 at least 3 times it would be good if some mechanized work could be done on the trail to maintain healthy tread in that area, which is narrow and somewhat sensitive.

Ewing Mountain Trail-(FST 4614) -

C-4971, S17- Once again the designated system trail is not shown on this map so it is hard to tell the effect of this treatment. The description in the Recreation Report states that skid trails will crisscross the trail so we would like the trail clearly marked for the benefit of both loggers and trail users. BCHVH will volunteer to better mark the official trail if need be. Also, we couldn't find information on where the logs in this area will be hauled out to Rt 643.

Moore Trail- (FST 4615)-

C- 4970, S11, S2- The correct route for the Moore Trail through this section is not shown on the map so it is hard to evaluate. In the area of the Moore Trail, about where the previous logging stops, there is a power line. The edges and woods surrounding the power line in that area are a favorite morel mushroom gathering area for local residents. If the treatment includes this area it would be nice if it could be identified and preserved. Just beyond this there is a Poplar forest with a large stand of Black Cohosh. This area has a special feeling for trail users and we hope that a buffer along the trail can be preserved.

I would also like to point out (as you probably already know) that the previous logging in this area performed approximately 12 years ago is a source of a lot of hard feelings from the public for the lack of communication that was done previous to this cut, which left a beautiful and loved area completely destroyed in the minds of the public who had no say in the action. We commend the present Forest Service administration and project team for actively including the public on the front end of this project so we can clearly know what to expect and voice our concerns and suggestions. It is hoped that some of the treatments in this area will be geared towards thinning and cleaning up from the previous logging.

C- 4970, S5 - The "Big Oak Tree", in the corner of the fence adjoining Brother Moore, is a much loved landmark. We would like an area around it preserved to protect the health of the tree and the aesthetics of the area, which is a favorite picnic spot for trail users.

C-4983, S1, S2, C- 4984, S16, S17- It appears that these sections are in the area that is locally known by trail users as the [ldquo]Frog Pond[rdquo] for the small seasonal vernal pool that lies next to the Moore Trail at the edge of the large clearing that is the intersection of the Moore Trail and two non-system trails. The Frog Pond area is a special place for trail users who use it as a picnic and meeting place and we would like it to be preserved as much as possible. The pool, when full, has the best water that horses will almost always drink. We hope that the proposed landing will not impact this loved clearing/meeting spot.

We are looking forward to the prospect that when the project in that area is finished that the Moore Trail can be moved to the nearby haul road to get it out of the drainage in that area. It would be great, if possible, while machinery is in the area building the haul road, that temporary improvements can be made to the existing Moore trail from the Collins Cove stone gate to the Frog Pond as it is washed out by the many strong storms we have been having and difficult to navigate.

Mike[rsquo]s Gap Trail (4504) - C-4972, S4- No issues observed in this area

Pellbridge Tract- C-4970, S87- No issues observed in this area.

Non-System Trails- It is well known that there are a large number of non-system (user) trails in the project area. Some of these trails are heavily used, important routes that are being studied for possible inclusion in the Trail Plan. Although we understand that the Trail Plan is outside the scope of this project, the fact that project treatments could adversely affect these trails makes it important for them to be included in this discussion. We would like to meet with Forest Service personnel and other local trail advocates to develop a plan to identify and protect the trails we feel are most important to be added to the system so that they are not damaged or destroyed in the process, causing unnecessary work to reopen them in the event that they are approved. First and foremost are the trails that are referenced on the 2015 Draft Working Map (included in this document) that fall in the project area. Work to identify these routes as potentially sustainable has already been done so we would like start there. There are other routes some may feel are equally as important as well so identifying these routes that are impacted by the project is important to the public. We look forward to working on this with the Forest Service and all interested parties.

Other General Concerns- In addition to direct impact on trails the comments we have heard the most pertain to access and the issue of logging traffic on local roads, which are narrow and already in poor shape.

Many are concerned about narrow roads such as Rt. 643 which accesses the Collins Cove Community and Collins Cove Horse Camp. Road signage during and public announcements of active logging alerting to activity on roads used for hauling would be helpful as well as ample signage on system trails.

Thank you so much for giving us the opportunity to be active in the management and planning of our public land. We hope for the best outcome for all parties involved and look forward to interacting on future projects.

Sincerely,

Nancy Sluys

President- Back Country Horsemen of the Virginia Highlands, Back Country Horsemen of Virginia

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