

Data Submitted (UTC 11): 3/25/2021 7:18:13 PM

First name: Mike

Last name: Mihalas

Organization: North Carolina Trout Unlimited

Title: Council Chair

Comments: Off-stream watering at the Curtis Creek horse parking area instead of doing a hardened access point on Curtis Creek (proposed trail E11): The point proposed for hardening has a large sand component and has extensive sedimentation issues already. We question the suitability of the soils to put in something like pavers and expect them to have a long service life. The better solution would be to rehabilitate the streambank and put in an off-site watering system in the parking lot. There are a number of options that could work, including drawing water from Curtis Creek or putting in a well-driven system, that would consistently run water through a trough. The area around the trough would be hardened to prevent erosion issues and the spillover water could be directed back into the stream or into a rain garden. While we understand that this is not an ideal setup from the perspective of the horseback riders' associations, we feel it is the best compromise to protect the streambank while also meeting their needs to water before and after leaving for their ride.

Inventory of current user-created access points on Curtis Creek (proposed trail E11), reduce the number of access points and create access points that are less prone to sedimentation: There needs to be some foot traffic control along this area as there are many spots that have inadequate riparian vegetation due to repeated human access. USFS needs to determine an acceptable level of access and the priorities from a historic access perspective. These historic priority access locations should be formalized using methods that would reduce trampling and erosion (see the Davidson River Area and how they are using stone for access locations). All other current points should be rehabilitated and access discouraged by placement of natural materials or fencing.

Wildlife openings: The two parking lots that are going in are going into permanent wildlife openings. We would ask that the USFS commit to offsetting or mitigating those closures by creating new openings, or supporting an equivalent habitat project, in the Old Fort area.

Major concerns with the plan for Newberry Creek loop, particular conversion of FSR482A: USFS's stated plan is for this to not be something you can access from the Blue Ridge Parkway and use as a downhill ride. They see it as the uphill portion of a larger mountain bike loop and don't plan on increasing the number of parking spots at the trailhead. Our concerns are that people will park where ever they can fit their car, including the private land just below the access, leading to public/private conflicts and that there are already user-created trails from the BRP to the upper areas of the new loop. While the intentions may be for this to be an uphill section, there is a high probability it will become a downhill section that people shuttle. Regardless of signage or blocking trails, anyone that has been around the National Forest knows it just takes a few people to start something and the crowds will follow. With Newberry Creek being a healthy native brook trout stream, we do not want to see the increased use lead to increased sedimentation issues in the creek caused by careless individuals.