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September 28, 2021
Mount Rogers NRA
Att: Barry Garten
District Ranger
3714 Highway 16
Marion, VA 24354

Dear Barry Garten,

The Back Country Horsemen of the Virginia appreciate the opportunity to participate in the public process and we generally approve of the Ewing Mountain Vegetation Management Project, however, our organization, as well as other members of the public, are concerned about the following statement contained in the Draft Decision Notice and the Environmental Assessment.

4. Close temporary roads and skids roads with enough jack-strawed trees and slash, or other means, to effectively prevent unauthorized vehicle or horse use, where necessary. This is specifically a concern where existing non-system horse trails are proposed as project temporary roads or skid roads/trails, or where they intersect. Signage and effectiveness monitoring may also be required.

We understand that Ewing Mountain Project and the eventual Trails Plan Strategy are two separate issues but the fact that the Vegetation Management Project is superimposed over the trail system makes these two issues related and intertwined to a point that can not be overlooked.

If the idea is to navigate the upcoming Trail Plan Strategy as smoothly as possible with the public, then statements like this, made before the public process concerning the trail system, seem anti-productive to the spirit of working together towards the same goal and sows the seeds of mistrust.

We would like to see a statement included in the Decision Notice recognizing the impact to present and future recreation opportunities. The following statement can be adjusted to fully fit our situation but is a good example of what we would like to see from the Forest Service.

"The proposed action would in many locations preclude public use of an extensive system of currently unauthorized trails and former forest roads. While recreational use of these roads and trails has not yet been subject to public input, environmental review and analysis via a comprehensive trails management plan, the Forest Service recognizes that the current vegetation management proposal would result in the loss or obliteration of many current and unauthorized routes enjoyed by the recreating public. It is estimated that approximately 20 miles of such routes could be lost to public recreational use, which is equivalent to approximately 75% of the current authorized trail system in the EA project area. The loss may be significant to some recreational users, including equestrians, in both the short- and long-term, particularly in the absence of the aforementioned trails plan. Consequently, mitigation is identified in this EA that would require a closer look during the implementation phase of vegetation treatments at preserving potentially sustainable but currently high-value non-system trails until such time the requisite public and environmental analysis takes place."

I have included a map outlining the system of undesignated trails that the public feel are important and that could be affected. The data on this map was created in 2015 at a public workshop and also includes proposed trails that were being looked at by the Forest Service at that time. Although this map may not fully reflect all the trails in question it is a good representation of what is on the ground. Until these trails can be fully studied as to their sustainability and possible inclusion in the trail system we request that they not be blocked or obliterated.

Thank you, Nancy Sluys

President- Back Country Horsemen of the Virginia Highlands