



COMMONWEALTH of VIRGINIA

Department of Wildlife Resources

Travis Voyles
*Secretary of Natural
and Historic Resources*

Ryan J. Brown
Executive Director

May 17, 2023

Dear Mr. Kennedy,

Thank you for sharing the Friends of Banshee Reeks position statement on Equestrian Trails at Banshee Reeks. We understand your concerns related to the installation and use of equestrian trails at Banshee Reeks Nature Preserve in Loudoun County. While we support getting Virginia's citizens on public lands and engaged in outdoor recreation, we believe those opportunities should be compatible with other uses already established on those public lands, be compatible with the goals and objectives for managing those lands and is supported by the land managers and the public they serve. It is considered good practice for land managing agencies and organizations to fully consider recommendations for new recreational activity, on public land, utilizing the most current scientific information available on the subject. Additionally, it is typical of a public land agency to allow the public to weigh in on new proposals.

In our experience as land managers across the Commonwealth, we have found that the installation and use of horse trails at our Wildlife Management Areas is incompatible with the established uses on, and management of, our lands, including hunting, fishing, wildlife watching, and wildlife habitat conservation for the following reasons, all of which result in increased maintenance needs:

- Horses can be vectors for invasive plant species and often leave behind significant amounts of excrement containing viable seeds. Subsequently, invasive plants disrupt local ecology by displacing native wildlife, invertebrates, and flora leading to decreased ecological function.
- Trail use by horses can have a negative cascading effect, starting with soil compaction and trenching, which increases and concentrates stormwater runoff, leading to erosion, leading to increases sediment loads in water systems and degradation of soils, ultimately leading to degradation of fish and wildlife and plant communities. This is especially the case for sensitive species.
- Horse excrement can lead to bacteria build up creating water quality issues, impairing aquatic systems and the life that live in them such as aquatic plants, fish, invertebrates, and herpetofauna.
- Horses and riders can interfere with other users, disrupting certain activities.

7870 VILLA PARK DRIVE, SUITE 400, P.O. BOX 90778, HENRICO, VA 23228
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I consulted with staff from the Virginia Natural Heritage Program (NHP) who operate Virginia's Natural Area Preserves under the Virginia Department of Conservation and Recreation (DCR). The Natural Area Preserves are likely to most comparable state lands to Banshee Reeks Nature Preserve in terms of mission and management. I've attached the NHP's *Natural Area Preserve Management Guidelines* as a resource and reference. The guidance document is currently under revision but there are no expected changes to information regarding horseback riding, which is also considered an inappropriate and incompatible use, as it is on Wildlife Management Areas. \

I also consulted with staff from the U.S. Fish and Wildlife Service's (USFWS) Potomac River National Wildlife Refuge Complex. The manager shared the *Finding of Appropriateness* forms, attached. The two forms, from 2011 and 2021, outline scientifically supported reasons for not permitting horseback riding on the refuge properties. The findings in these reports are similar to DCR's NHP and DWR's findings of the issues surrounding horseback riding, including those listed above with the addition of impacts to wildlife resulting in disturbance, shift in habitat use, abandonment of habitat, and increased energy demands on wildlife. In conversation with the manager, she also noted that horseback riding didn't really add a new way of interpreting or experiencing the refuges that wasn't already offered, adding that horseback riding is already offered on properties, outside the refuge boundaries within reasonable distances, thus not adding a unique area for riders.

DWR manages lands similarly to Banshee Reeks Nature Preserve in that efforts are made to protect ecological functions and maintain a healthy diversity of wildlife, plants, and invertebrates. The modern domesticated horse didn't arrive in North America until the late 1400's. As a result, North American landscapes hadn't evolved with ecological resiliency to this relative newcomer. Community leaders responsible for land specifically set aside as a preserve for wildlife habitat conservation, environmental protection, and for public enjoyment must seriously consider the consequences of horseback riding as a major contributor to environmental degradation where the goal is to preserve ecological function.

If horse trails must be established at Banshee Reeks, we recommend that they be designed to avoid impacts upon streams, wetlands, any unique or designated wildlife habitats in addition to minimizing impacts to the soil. We recommend following standard trail designs established by appropriate State and Federal Government public land agencies responsible for similar nature preserves, with similar missions, to emphasize minimized environmental impacts. Further, we recommend special consideration of the following elements of horse trail recreation, all of which will have some negative ecological impact and impact on visitor experiences:

- Consider the overall footprint of adding the necessary amenities in addition to the footprint of horse trails. Parking areas will have to accommodate large trailers and provide safe entry and exit for vehicles, people, and horses. Considering the area needed to accommodate larger vehicles, this may be prohibitive alone relative to the overall size of the Preserve. This is noted in the attached documents, see the *Finding of Appropriateness* document for NWRs
- Avoid soils that poorly drain or are susceptible to erosion.
- Harden trails with gravel and ensure proper drainage to minimize erosion, invasive

species distribution, and water quality degradation.

- Consider the maintenance hours and staff needed to maintain equestrian parking lots and horse trails which are wider and provide more head clearance than a foot path trail.
- Establish rules for horseback riders to protect the ecology and water quality of the Preserve.
- Provide education to horseback riders on rules to ensure minimal impacts to the environment and follow through with policing to ensure compliance.
- Consider the staff time needed to provide education and enforcement of the rules.
- Promote appropriate visitor behavior for all user types to minimize conflicts between groups, but be prepared for conflicts to pop up and have a plan for conflict mitigation and response. For this reason and the four bullets above the Refuges don't allow horseback riding as there just aren't enough staff to ensure riding is done safely.