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February 8, 2024

Parks, Recreation and Open Space Board
742 Miller Dr SE
Leesburg, VA 20175

To Parks, Recreation and Open Space Board Members:

I am writing on behalf of Loudoun Wildlife Conservancy (LWC) in regards to the Business Action Item: Equestrian Trails at Banshee Reeks Nature Preserve (Banshee Reeks) to be heard during the February 8, 2024 Parks, Recreation and Open Space (PROS) Board Meeting.

- The process for soliciting public input and comprehensive factual information on this topic is highly flawed.
- It would be inappropriate for the PROS Board to make any recommendation to PRCS staff or the Board of Supervisors (BOS) due to insufficient information to make an informed decision.

There are numerous flaws in the process for the PROS Board to adequately capture public input and comprehensive information on the potential impacts of equestrians at Banshee Reeks in order to make an informed decision.

- The Linear Parks and Trails (LPAT) Subcommittee was not informed that this topic would be discussed by the PROS Board, and it was not on their agenda for February 8, 2024. This is particularly disappointing given that PRCS staff had previously assured the LPAT Subcommittee that any updates on equestrian uses at Banshee Reeks would be provided to it. That did not occur. This is concerning on multiple levels, not the least of which is that both PRCS staff and Loudoun County Equine Alliance (LCEA) both reference the LPAT System in their remarks.
- There are interested stakeholder groups and residents who were not involved or invited to participate in giving public input. There are more interested stakeholder groups, and subject matter expertise, beyond LCEA and Friends of Banshee Reeks (FOBR). All levels of PRCS staff has previously been contacted by LWC and our known interest in providing input and our concerns relating to potential equestrian uses at Banshee Reeks. LCEA was invited to participate at this meeting in an email from Steve Torpy, on behalf of the PROS Board on January 12, 2024, and yet our organization only found out about this meeting yesterday – through a message from one of our members on Facebook, and subsequently by FOBR.
- No information was provided to the general public beyond the Agenda for the PROS Board meeting until approximately 2pm on February 7, 2024. This only occurred after it was requested by a member of the public. This makes it extremely difficult for the public to offer substantive comments to the PROS Board, or anyone else, which is particularly concerning given the complex nature of the topic.
- While the packet of information provided by PRCS staff to the PROS Board includes some background information from PRCS and the perspective of LCEA, it only references a cover

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letter from FOBR to the BOS and does not include attachments from Virginia Department of Wildlife's biologist Jordan Green on his assessment of potential equestrian impacts (attached and summarized below). The packet does not include other information from subject matter experts or other groups who have expressed concerns about environmental impacts of equestrians in sensitive areas such as Banshee Reeks.

- **There is a need for more equestrian trails, and there is a need to protect more open spaces for wildlife habitats (Banshee Reeks is the only Nature Preserve) in Loudoun County. Solutions should be sought to do both, not one at the expense of the other.**

In Steve Torpy's October 11, 2023 email to the BOS, he describes potential impacts on equestrian use as having "some conflicting research", and provides a short summary of some impacts and that "staff is looking at ways to mitigate this impact". In our opinion, this short assessment belies the serious potential negative impacts that need to be adequately studied before any recommendation is made to the BOS. **Even within the conflicting research, one theme is that equestrian impacts are site specific, they must be carefully studied and planned for to avoid and/or mitigate potential impacts, and research shows impacts are significantly greater in environmentally sensitive areas (and a large portion of Banshee Reeks has sensitive areas).** The PROS Board needs more information than what has been provided (at least what information that has been made publicly available) in order to make an informed decision.

- It is unclear precisely what recommendation the PROS Board is potentially going to make, and that is also concerning. While there is a map on page 13 of the packet that highlights the northern perimeter trail that has been opened to equestrian use, there is little detail in LCEA's proposal on where trails would go besides "asking for access to not less than 8 miles of the 20+ mile trail system, with the ability to add more access in the future".
- Furthermore, there is little to no detail on how LCEA or PRCS acknowledges or proposes to mitigate potential impacts of equestrian users should access be granted. Nor are there considerations or recommendations for monitoring of potential impacts, additional staff time needed for maintenance and enforcement, how equestrian traffic would be limited or restricted in general or during adverse weather conditions, etc.
- The information packet does contain on page 12 a Special Conditions Map from the Virginia Outdoors Foundation which shows significant areas of environmental importance.
- We have attached correspondence from VA DWR biologist Jordan Green to FOBR, and his assessment of equestrian impacts by state and federal land management agencies tasked with managing and preserving wildlife habitat – one of the core mandates of Banshee Reeks as a nature preserve. We have summarized and highlighted those concerns below (emphasis added).

Loudoun Wildlife Conservancy does not believe that the PROS Board has been given adequate information or time to conduct a comprehensive review of the potential impacts of equestrian use at Banshee Reeks, nor have they provided adequate opportunity or notice for the public to express concerns on this topic, and therefore, the PROS Board should not make any recommendation to the BOS or PRCS staff on this topic.

Below are concerns from Loudoun Wildlife Conservancy in regards to potential additional equestrian uses beyond what is currently approved in the Banshee Reeks Master Plan and Addendum.

According to the Banshee Reeks Master Plan and Addendum (February 2001), **Banshee Reeks was created "exclusively for the purpose of conservation and related limited, non-intrusive education uses", and the Addendum purposefully removed all equestrian trails from the plan.** ("Only a perimeter trail on the northern edge of the property should be permitted, and only if there are adjacent trails outside for it to connect to. No equestrian trails should ever be built near Goose Creek or



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in any environmentally sensitive area.”) Loudoun Wildlife acknowledges that since the opening of Evergreen Mills Park with a perimeter trail around the landfill, there is now an adjacent trail with equestrian access.

Allowing widespread uses of horses on the trails at Banshee Reeks would have **negative ecological impacts to the environmentally sensitive areas that make up a majority of the nature preserve**, and it would impair the conservation values of the property, which conservation easements are intended to protect.

According to **Virginia Department of Wildlife biologist Jordan Green**, “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**” for these reasons:

- “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**, resulting in increased 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.”

Additionally, Jordan Green notes that:

- **Horseback riding is “considered an inappropriate and incompatible use”** on Virginia Department of Conservation and Recreation’s Natural Area Preserves which are likely to be the “most comparable state lands to Banshee Reeks Nature Preserve in terms of mission and management”.
- And, that the U.S. Fish and Wildlife Service’s Potomac National Wildlife Refuge Complex has also outlined “**scientifically supported reasons for not permitting horseback riding on the refuge properties**”.

Thank you for your consideration of this complex topic, and **we hope the PROS Board will provide future recommendations to pursue more opportunities to provide equestrian trails in environmentally appropriate areas and to preserve more natural areas to be managed specifically for wildlife habitat.**

Sincerely,

Michael Myers
Executive Director

PO Box 1892, Leesburg, VA 20177