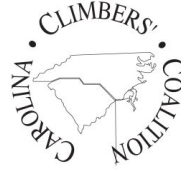




Protect America's Climbing



November 11, 2013

National Forests in North Carolina
Nantahala-Pisgah Plan Revision
160 Zillicoa St. Suite A
Asheville, NC 28801
Email: NCplanrevision@fs.fed.us

RE: Access Fund Comments on the Draft Assessment for the Pisgah and Nantahala National Forest

Dear Forest Planning Team:

The Access Fund appreciates this opportunity to provide feedback on the Forest Plan Draft Assessment (Assessment) for the Pisgah and Nantahala National Forest. With over 1 million acres, the Pisgah and Nantahala National Forest (the Forest) provide a high concentration of popular and high quality climbing opportunities, running the gamut from multi-pitch backcountry wilderness adventures to frontcountry bouldering test-pieces. We appreciate that climbing is acknowledged as one of the many recreational uses of the Forest.¹

The Access Fund and Carolina Climbers Coalition welcome the opportunity to provide key input into this forest plan revision, in particular the assessment of recreational rock climbing and appropriate management and maintenance policies. We appreciate that the intention of the Assessment is in part “to develop relationships, facilitate participation in the planning process, and develop mutual understanding of the complex topics related to forest planning.”² These comments are intended to assist planners develop appropriate alternatives that enhance and protect climbing access, while sustaining the health, diversity and productivity of the Forest.

The Access Fund

Access Fund is the only national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment. A 501(c)3 non-profit supporting and representing over 2.3 million climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—Access Fund is the largest US climbing organization with over 11,000 members and affiliates. We currently hold memorandums of understanding with the Bureau of Land Management, National Park Service, and Forest Service to help define rules for how climbing will be managed on federal land.¹ North Carolina is one of our larger member

¹ *Draft Assessment of Pisgah and Nantahala National Forest*, at [http://livingassessment.wikispaces.com/Pisgah and Nantahala+NF+Composite+Edit](http://livingassessment.wikispaces.com/Pisgah+and+Nantahala+NF+Composite+Edit).

² Assessment at 1.

states and many of our members regularly travel to climb in the Forests. For more information about the Access Fund, visit www.accessfund.org.

Carolina Climbers' Coalition

Carolina Climbers' Coalition is a local 501(c)3 non-profit local climbing organization whose mission is preserving, protecting and expanding climbing opportunities in North and South Carolina. Founded in 1995, CCC works with municipal, state and federal land managers to steward climbing areas and to protect climbing access. CCC also works with private land owners, and has purchased two climbing areas which are managed for public climbing access: the tallest cliff face in the East, Laurel Knob, near Cashiers; and Rumbling Bald West Side Boulders, near Chimney Rock. CCC also leases and manages Asheboro Boulders in central N.C. Carolina Climbers' Coalition is an Access Fund affiliate organization. For more information on the CCC, visit www.carolinaclimbers.org.

COMMENTS

The rock and mountain climbing in the Pisgah and Nantahala National Forest is some of the most popular, high quality and accessible of its kind in the country. The Forest contains several distinct climbing areas, ranging from world-renowned to obscure, throughout a wide range of opportunity classes. Each area is unique, and site-specific considerations should determine the appropriate level of management. But first planners need to better understand climbing use patterns on the Forest.

A comprehensive survey of climbing use patterns is critical to developing an effective recreation management plan for the Forest. However, such climbing related data is currently not captured by the Forest Service's *National Visitor Use Monitoring* (NVUM) program. Most Forest information related to climbing is anecdotal and incomplete in significant ways. Given the lack of national protocols for NVUM related to climbing, it is important that Pisgah and Nantahala National Forest planners take extra measures to contact the climbing community to better inventory climbing activity and use patterns so that longstanding climbing access roads and trails are identified and appropriately managed and maintained. Furthermore, considering the lack of national Forest Service guidance on the use and placement of fixed anchors in wilderness, and the fact that a significant amount of wilderness climbing occurs on the Forest, this Plan should clarify appropriate procedures for authorizing the *de minimus* use of these necessary climbing tools.³ The Access Fund, and Carolina Climbers Coalition, in consultation with additional North Carolina climbers, can help Forest planners effectively inventory and understand climbing use patterns, local ethics, the history of each climbing area, and appropriate management policies that will protect and enhance these nationally-significant climbing opportunities.

Pisgah and Nantahala National Forest Recreation Assessment

The purpose of the Assessment seeks to identify the volume of Forest visitors, activity preferences, recreation settings and opportunities, scenery management, and outlook for

³ The National Park Service recently issued national policy governing wilderness climbing including fixed anchor use (see _____); the BLM in 2007 clarified their wilderness climbing anchor policy (see _____).

sustainable recreation. The focus of the Forest Plan assessment for recreation is to identify and evaluate information about recreation settings; use; trends and sustainability of recreation opportunities in the plan area; recreational preferences of the public; recreational access; and scenic character.⁴

National Visitor Use Monitoring Survey

The Assessment relies on the National Visitor Use Monitoring Survey (NVUM) program⁵ that provides “science-based estimates of the volume and characteristics of recreation visitation to the National Forest System and NVUM data is useful for forest planning and decision making.”

The Assessment notes that in the assessment for the plan development the Pisgah and Nantahala National Forest “shall identify and evaluate existing information relevant to the plan area for . . . Recreation settings, opportunities and access, and scenic character.”⁶ Unfortunately, there is no NVUM data to support a thorough recreational assessment of climbing in the Forest. Notwithstanding the lack of climbing data, Pisgah and Nantahala National Forest has an abundance of excellent climbing resources and is a popular destination for bouldering, sport climbing, traditional climbing, ice climbing and big wall climbing. These forms of climbing occur in all Recreation Opportunity Spectrum (ROS) classifications within the Forest. It is evident that climbing is an integral recreational pursuit within the Forest and should be acknowledged in its comprehensive recreation assessment.

Forest Service’s Recreation Opportunity Spectrum (ROS)

The Assessment notes that “diverse recreation settings are necessary to meet the needs and desires of a diverse population of recreationists.” Climbers choose a setting and activity to achieve a desired experience. The Forest’s range of recreation settings for climbing is impressively diverse, hosting climbing in wilderness, backcountry, and front country settings.

The Recreation Opportunity Spectrum (ROS) offers a framework for understanding these relationships and interactions. The Spectrum has been divided into six major classes:

1. Primitive - Primitive recreation contributes to a great deal of climbing opportunities in the Forest and many climbers visit the area precisely and exclusively for this type of recreation. This includes many of the area’s multi-pitch and single-pitch climbing routes that involve long, strenuous approaches in order to achieve the level of remoteness and solitude that primitive recreation offers. Big Lost Cove Cliffs and the many outstanding cliffs in the Linville Gorge Wilderness—such as North Carolina Wall—are examples of climbing in the “Primitive” category.

2 & 3. Semi-Primitive Non-Motorized/Motorized - Semi-primitive non-motorized and motorized recreational opportunities also provide for many climbing areas in the Forest. These

⁴ DRAFT ASSESSMENT RECREATION 09/19/2013, 110.

⁵ See <http://www.fs.fed.us/recreation/programs/nvum/>

⁶ See *Draft Assessment of Pisgah and Nantahala National Forest*, Chapter 9 at

include less remote big walls, multi-pitch routes, as well as single-pitch climbs that may require long, secluded approaches to access. Cedar Rock and Big Green are examples of a climbing setting in the Semi-Primitive classification.

4. Roaded Natural - Roaded natural areas are increasingly popular climbing destinations in the Forest because of their accessibility. These include multi-pitch climbers, single-pitch climbs, and bouldering areas. Bouldering is popular in the Forest due to the growing reputation of the area's quality resources. While many bouldering resources exist in remote areas of the backcountry, a great deal of it occurs near roaded areas that make such climbing easily accessible. Looking Glass Rock and Lost Cove Boulders are examples of climbing settings in the Roaded Natural classification.

5. Rural - Rural climbing opportunities in the Forest consist of bouldering, and single-pitch, multi-pitch and big wall rope climbing near populated areas. Whitesides Mountain and Table Rock are examples of climbing settings in the Rural classification.

6. Urban - Urban climbing opportunities are rare in the Forest, as there is little urban environment in the Forest.

It is evident that the Forest is host to an immensely diverse variety of climbing opportunities in an assortment of recreational settings. Climbing is prevalent in all of the Assessment's identified ROS classifications and should be included in the Forest Assessment if the ROS classifications are to truly benefit the public's desired benefits and outcomes.

Sustainable recreation is of particular value to climbers, as they have a strong impetus to protect and steward the geologic resources on which they recreate. Scenic character is a fundamental aspect of the popularity of climbing in the Forest; climbers are similarly interested with the Forest's natural landscape as other user groups and they visit in large part because of the Forest's impressive and unique scenic values. Finally, recreation access is essential to providing climbing opportunities in the Forest through well-maintained trails to backcountry and frontcountry endeavors, and appropriate roads and parking areas associated with frontcountry settings.

There is a high demand for climbing in all recreation setting with the Pisgah and Nantahala National Forests. Climber preferences range from a desire for solitude on multi-pitch backcountry traditional crags, to front country dispersed climbing on a variety of traditional and sporting climbing venues, to front-country areas of high-visitation for bouldering, sport climbing or traditional opportunities. Key to all opportunity classes is the need for road and trail access. This Forest plan revision should ensure that existing roads and trails allow continued climbing opportunities.

Significant Climbing Resources on the Pisgah and Nantahala National Forest

The Forest's draft assessment⁷ makes brief mention that "rock climbing, rappelling, ice climbing,

⁷ DRAFT ASSESSMENT RECREATION 09/19/2013, 38. The Assessment also notes that "the greatest number of special use authorizations issued on the Nantahala and Pisgah NFs are for road easements and for outfitting and guiding activities... [including] rock climbing. Outfitting and guiding conducted on NFS lands have become one of

and mountaineering are technical and unique ways to experience national forests. The rugged but accessible terrain makes climbing in the Pisgah and Nantahala National Forests provides a wide range of options, levels of commitment, and rock types. Whiteside, Big Green, Cedar Rock, Lost Cove, Looking Glass, and Linville Gorge are premier climbing locations which provide opportunities ranging from bouldering to single-pitch and multi-pitch climbs. In addition, “current climbing management allows recreational access while protecting natural and cultural resource values. For example, seasonal peregrine closures at Whiteside, Wall, and other cliffs successfully balance peregrine falcon protection with recreational access. Seasonal restrictions may vary from site to site.” Other than this brief reference no specific climbing area locations are identified in the Assessment.

If the “focus of the Forest Plan assessment for recreation is to identify and evaluate information about recreation settings; use; trends and sustainability of recreation opportunities in the plan area; recreational preferences of the public; recreational access; and scenic character,”⁸ then the Forest should recognize and ensure access to climbing resources within all of its Recreation Opportunity Spectrum (ROS) classifications. As stated, there are vast opportunities for climbing in the Forest and resources occur on a diverse array of recreation settings. Furthermore, national direction for developed recreation instructs national forests to “provide a broad spectrum of outdoor recreation opportunities consistent with the applicable recreation opportunity spectrum (ROS) class that reflects a balance of environmental, economic, and social factors and the natural and cultural landscape.”

Below is a map and list with GIS coordinates of climbing areas⁹ within the Pisgah and Nantahala National Forest.¹⁰

the primary means for the recreating public to experience the outdoors.” See DRAFT ASSESSMENT RECREATION 09/19/2013, 106.

⁸ See Assessing Recreation Settings, Opportunities and Access, and Scenic Character, 5.

⁹ Most of this climbing area information is publicly available through websites such as www.mountainproject.com and www.summitpost.org; also local climbing guidebooks, such as Climber's Guide to North Carolina by Thomas Kelley (1995, Earthbound Sports), and Selected Climbs in North Carolina by Yon Lambert and Harrison Shull (2002, The Mountaineers).

¹⁰[http://livingassessment.wikispaces.com/Pisgah and Nantahala+NF+Composite+Edit#Chapter%209](http://livingassessment.wikispaces.com/Pisgah+and+Nantahala+NF+Composite+Edit#Chapter%209).

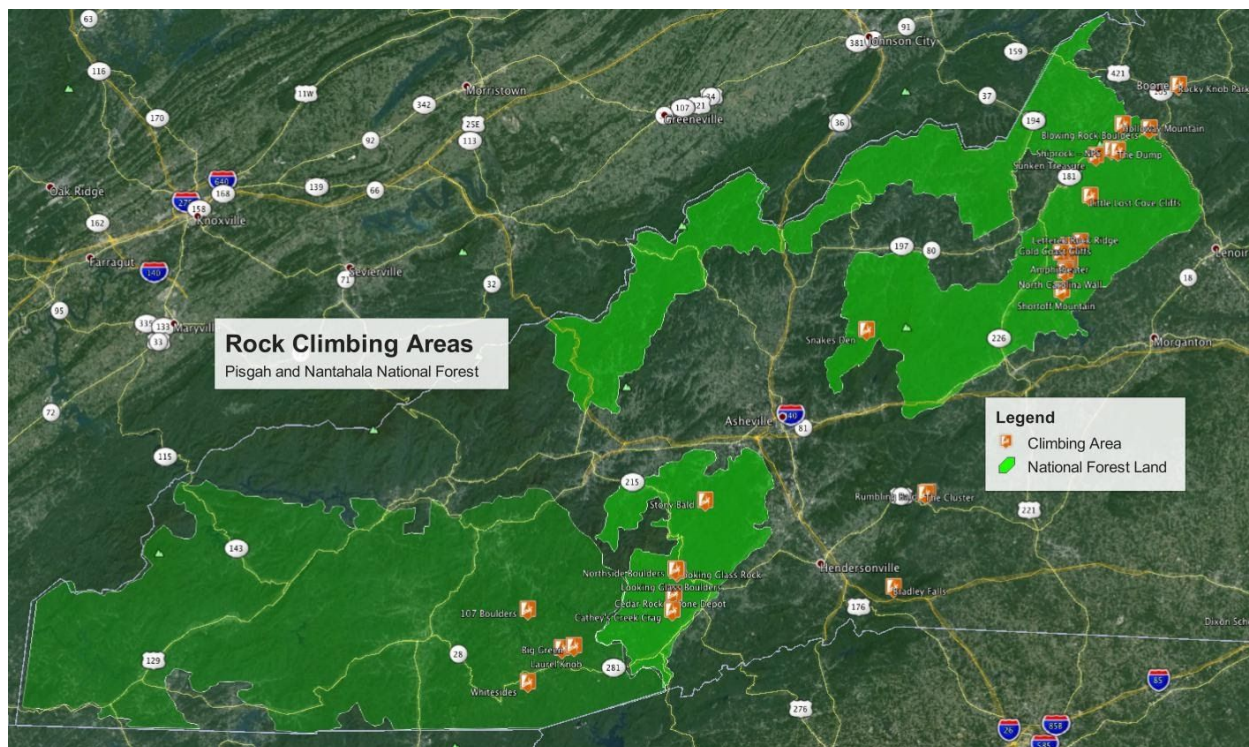
This list is not meant to be comprehensive; as will add to our database of climbing areas we will inform Forest planners of additional locations.

Pisgah and Nantahala National Forest

Climbing Area	GIS Coordinates	Access Road
The Dump	36.0971, -81.7719	Blowing Rock Hwy/Highway 221
Sunken Treasure	36.0868, -81.8219	Blue Ridge Parkway
Little Lost Cove Cliffs	36.0424, -81.5092	Pineola Road
Lettered Rock Ridge	35.5529, -81.5129	FS 496
Linville Gorge	35.8868, -81.8851	Table Rock Road
Hawksbill Mountain	35.5446, -81.5313	Table Rock Road
Gold Coast Cliffs	35.5413, -81.5418	Old NC 105/Kistler Memorial Hwy
Sitting Bear	35.9279, -81.8902	Table Rock Road
Table Rock	35.5323, -81.5315	Old Table Rock Road
North Carolina Wall	35.5226, -81.5335	Old Table Rock Road
Amphitheater	35.5211, -81.5339	Old Table Rock Road
Shortoff Mountain	35.8314, -81.9026	Wolf Pit Road
Snake's Den	35.7577, -82.3591	Dillingham Rd
Stony Bald	35.4353, -82.7291	Blue Ridge Parkway
Looking Glass Rock	35.2948, -82.7882	FR 475
Northside Boulders	35.1818, -82.4746	FR 475
Stone Depot	35.2591, -82.8004	Cathey's Creek Road
Cedar Rock	35.2535, -82.8003	Cathey's Creek Road
Cathey's Creek Crag	35.2273, -82.8034	Cathey's Creek Road

Nantahala National Forest

Climbing Area	GIS Coordinates	Access Road
107 Boulders	35.2265, -83.137	Highway 107
Big Green	35.1562, -83.0281	Bredlove Road
Whitesides Mountain	35.0798, -83.1432	Wildcat Ridge Road



Climbing Areas in the Pisgah and Nantahala National Forest

Access Fund Assistance

Please contact us for assistance developing a climbing management plan for the wilderness and non-wilderness areas of the Forest. Our publication, *Climbing Management: A Guide to Climbing Issues and the Development of a Climbing Management Plan* has proven to be a useful tool for land managers across the country.¹¹ The Access Fund, Carolina Climbers Coalition and the climbing community are ready, willing, and able to help planners identify and improve the climbing related trail system, roads, and other management needs the Forest may require to provide for the world class opportunities found in the Pisgah and Nantahala National Forest. In addition, some aspects of this planning initiative may qualify for Access Fund Climbing Preservation Grant Program¹² or assistance from our Conservation Team¹³ which helps maintain climbing areas throughout the United States by assessing climbing area conservation needs, working with locals to address those needs, and providing training on planning and stewardship best practices to keep those areas healthy.

* * *

Thank you for your consideration of climbing management for Pisgah and Nantahala National Forest. The Access Fund and Carolina Climbers Coalition have the experience, local contacts, and resources to help planners craft alternatives that protect and enhance climbing opportunities while sustaining the health, diversity and productivity of the Forest. The Access Fund looks

¹¹ See <http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/CM-web.pdf>

¹² See http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000903/k.9722/Grants_program.htm

¹³ See http://www.accessfund.org/site/c.tmL5KhNWLrH/b.7653393/k.AEEB/Conservation_Team.htm

forward to participating throughout the entire planning process. Please keep us informed as the planning process proceeds. Feel free to contact me via telephone (303-819-2969) or email (jason@accessfund.org) to discuss this matter further.

Best Regards,

A handwritten signature in black ink that reads "Jason Keith". The signature is written in a cursive, flowing style.

Jason Keith
Sr. Policy Advisor
The Access Fund

Cc: Carolina Climbers Coalition