



January 14, 2015

National Forests in North Carolina
Nantahala-Pisgah Plan Revision
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**RE: Access Fund Comments on Nantahala and Pisgah Land Management Planning –
*Desired Conditions, Management Areas, Recommended Wilderness, and Place Based
Recreation***

Dear Forest Planning Team,

The Access Fund and Carolina Climbers' Coalition welcome this opportunity to comment on the pre-NEPA concepts: *Desired Conditions, Management Areas and Recommended Wilderness, and Place Based Recreation*. We applaud the recognition of climbing specifically, and recreation generally, in the pre-NEPA planning documents and discussion. However, there are a few significant additions to the documents (proposed in the following comments) that would reflect the importance of recreation and maintain balance when presenting Forest values and desired conditions.

Climbing is a significant, historic and continuing recreational use of the Nantahala and Pisgah National Forests (the Forests). Climbing areas like Whiteside, Looking Glass and Linville Gorge provide premier climbing routes ranging from short boulder problems, to single-pitch sport climbs, to multi-pitch wilderness adventures. The many climbing opportunities in the Forests benefit climbers, local communities, businesses, educational institutions, and contribute to the health and well-being of North Carolina and the wider region. The Access Fund and Carolina Climbers' Coalition are committed to assisting planners by providing climbing management expertise, resources, and community outreach.

Access Fund

Access Fund is the only national advocacy organization whose mission is to keep climbing areas open and conserve the climbing environment. A 501(c)3 non-profit supporting and representing over 6.8 million climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—Access Fund is the largest US climbing advocacy organization with over 10,000 members and affiliates. We currently hold memorandums of understanding

with the Bureau of Land Management, National Park Service, and Forest Service to help define how climbing will be managed on federal land.¹ North Carolina is one of our larger member 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 (CCC) 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 three climbing areas which are managed for public climbing access: the tallest cliff face in the East, Laurel Knob, near Cashiers; Rumbling Bald West Side Boulders, near Chimney Rock; and Hidden Valley, near Abingdon, VA. CCC also leases and manages Asheboro Boulders in central N.C and the Sauratown cliff near Winston Salem. Carolina Climbers' Coalition is an Access Fund affiliate organization. For more information on the CCC, visit www.carolinaclimbers.org.

COMMENTS

Desired Conditions

The document 'Proposed Management Area Framework And Forest-wide Desired Conditions' describes how the Forests should look and feel, and provides the Forests with a set of goals that can serve as backdrop for the Land Management Plan revisions. We note, however, the discrepancy in detail between the Desired Conditions for the biological conditions of the Forests and the social conditions such as for outdoor recreation. We believe that human-powered recreation is one of the fundamental values of the Forests and as such deserves greater attention.

Therefore, under the Recreation heading, we recommend adding the following:

“Management decisions take into account the importance to people of highly specific places and experiences within the Forest landscape”.

and

“Human-powered recreation experiences are available, in all seasons, in accessible non-motorized areas, as well as the remote backcountry. High-quality terrain, points of interest, and opportunities for solitude and challenge exist in both front and backcountry settings. An extensive and well-maintained trail network offers additional recreation opportunities for snowshoers, cross-country skiers, hikers, mountain bikers, runners, climbers, and other non-motorized users”.

Under the Trails heading we recommend:

“Trail systems reflect a deliberate effort to interact with the landscape and recognize the differing needs of various users. Systems are managed to provide specific trail experiences and employ sustainable construction and maintenance. Trail systems showcase the landscape, are light on the land, steer visitors away from sensitive areas where necessary, and provide a broad range of experiences”.

And under the Transportation and Forest Access heading we recommend:

“A sustainable system of roads provides year-round access to recreation opportunities people want to visit. Decisions about decommissioning and maintenance are responsive to the desires and recreational use patterns of the public, as well as economic and environmental considerations”.

Management Areas and Recommended Wilderness

Management areas define the management strategy for specific zones within the Forests. Climbing areas can fit nicely within MA-3 (Backcountry), MA-5 (SIAs), MA-6 (WSAs and RWAs) and MA-10 (Concentrated Recreation Areas) among others. However, we are concerned that specific boundaries and definitions associated with certain management areas do not fully support human-powered recreation and appreciate the opportunity to recommend some changes that both optimize opportunities for human-powered recreation and support the Forest’s mission.

Management Area 6 includes Wilderness Study Areas and Recommended Wilderness Areas. We do not support wilderness recommendations for Panthertown Valley, Cedar Rock Mountain, Dobson Knob (Linville Ext B), and Upper Wilson Creek without significant boundary modifications to preclude areas that have existing climbing resources that may prove problematic considering the forthcoming Forest Service Manual 2320 guidelines for wilderness climbing management. In addition to popular rock climbing resources, these areas are host to other recreational uses like hunting, past and current vegetation management, seasonal roads and even power lines. We believe the opportunities, resources and character of these areas may be more effectively managed under MA-3 Backcountry status or through congressionally designated National Recreation Areas. Additionally, it is important to note that we are actively working alongside The Wilderness Society and other conservation and human-powered recreation organizations to develop mutually beneficial solutions to issues associated with WSA and RSA boundaries.

We also note that no Special Interest Areas (MA-5) utilize recreation as a defining attribute although recreation is listed as a potential defining characteristic for Special Interest Areas. The Forests contain exceptional rock climbing resources that should be listed as supporting criteria for Special Interest Areas. We recommend rock climbing to be listed as a valuable resource, in addition to cultural and natural resources, for Whiteside Mountain, Scaly Mountain and Catstairs,

Linville Gorge, John Rock, and Looking Glass Rock. This way, exceptional climbing resources will be memorialized and management plan revisions can substantiate the continued maintenance of valuable climbing opportunities.

Place Based Recreation

In the ‘Recreation: Place-based Settings’ document, rock climbing is currently acknowledged as a “current condition” only in the Johns River/Linville Gorge Area. This area is indeed host to significant, historic rock climbing resources and activity, and is therefore very appropriately listed as an activity for the area. However, rock climbing should also be acknowledged as a “current condition” and listed as an activity in the Highlands Domes Area and the Bent Creek/Mills River/Davidson River Area. Both of these areas offer unique, significant and historic rock climbing resources. Climbing resources such as Whitesides Mountain, Cedar Rock, Looking Glass and Big Green are highly popular and nationally renowned, attracting climbers from across the region and country. Listing the aforementioned climbing areas will accurately depict the existing conditions within the unique, geographically defined Place-based settings and allow recreation managers to consider climbing resources as a significant visitor destination.

Access Fund and CCC Assistance

The Access Fund manages the largest crowd-sourced list of wildlife related and other climbing closures in the country.² We work with federal, state, and private land managers to develop and implement climbing management plans that are currently in use across the country, and have organized and hosted several national climbing management conferences, attended by hundreds of land managers from across the country.³ In many cases, climbers actively assist⁴ by maintaining trails, removing trash,⁵ and participating in the locating, monitoring, and reporting on species of concern.⁶ The Access Fund and CCC have the experience, expertise, and resources to assist planners develop management policy that protects natural resource values and maximizes recreational access.

Please contact us for assistance developing climbing management policies for the wilderness and non-wilderness areas of the Forests. Our publication, *Climbing Management: A Guide to Climbing Issues and the Development of a Climbing Management Plan*⁷, and website www.climbingmanagement.org, have both proven to be a useful tool for land managers across the country. The Access Fund, CCC and the local climbing community are ready, willing, and able to help planners identify and improve the climbing related trail system and other management needs. In addition, some aspects of this planning initiative may qualify for Access Fund Climbing Preservation Grant Program⁸ or assistance from our Conservation Team⁹ 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.

* * *

The Access Fund and CCC look forward to continuing to participate throughout the entire planning process and assisting planners to develop management policy that encourages climbing while sustaining the health, diversity and productivity of the Forests. Please keep us informed as this Plan revision process proceeds. Feel free to contact me via email (erik@accessfund.org) to discuss this matter further.

Best Regards,



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Access Fund



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Cc: Brady Robinson, Access Fund, Executive Director
Zachary Lesch-Huie, Access Fund, Southeast Regional Coordinator

¹ http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000797/k.40E2/Collaboration_with_federal_agencies.htm.

² <http://status.accessfund.org>.

³ www.climbingmanagement.org.

⁴ The Access Fund sponsors approximately 130 Adopt a Crag events annually across the country. Adopt a Crag is the Access Fund's signature stewardship program. It exists to unite local climbing communities in partnerships with land managers to conserve local climbing areas. Adopt-a-Crag events typically include activities such as litter clean-ups, trail construction and restoration, erosion control, and invasive weed removal. *See* <http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000889/k.166C/AdoptaCrag.htm>.

⁵ In July 2011, the Access Fund launched a Conservation Team that will spend ten months a year traveling the country addressing conservation issues. *See* <http://www.accessfund.org/site/apps/nlnet/content2.aspx?c=tmL5KhNWLrH&b=7903133&ct=13665559¬oc=1>.

⁶ *Examples include:* Luther Rock, Lake Tahoe, CA; Pinnacles National Monument, CA; Eldorado Canyon State Park, CO; Jefferson County Open Space, CO; Acker Rock, OR; Trout Creek, OR; Boulder Canyon, CO.

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

⁸ http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000903/k.9722/Grants_program.htm.

⁹ http://www.accessfund.org/site/c.tmL5KhNWLrH/b.7653393/k.AEEB/Conservation_Team.htm.