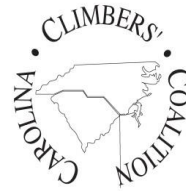




Protect America's Climbing



12/15/2015

Nantahala-Pisgah National Forest Supervisor's Office  
Forest Plan Revision: Wilderness Inventory Areas Evaluation  
160 Zillicoa Street, Suite A  
Asheville, NC 28801  
[NCPlanRevision@fs.fed.us](mailto:NCPlanRevision@fs.fed.us)

**RE: Nantahala-Pisgah National Forest Plan Revision: Wilderness Inventory Areas-Evaluation Phase**

Dear Forest Planning Team,

The Access Fund and the Carolina Climbers Coalition (CCC) welcome this opportunity to comment on the Nantahala-Pisgah National Forest Plan Revision, Wilderness Inventory Areas Evaluation Phase. We applaud the work to inventory lands that may be suitable for inclusion in the National Wilderness Preservation System across the Nantahala-Pisgah National Forest Plan (NPNF). Public participation throughout the decision-making process is the cornerstone to any effective management decisions and the Access Fund and CCC applauds the NPNF's solicitation of input on this very important topic to climbers. All of the areas inventoried have exceptional roadless, ecological, and recreational values that should be preserved. We recognize the exceptional backcountry and wilderness values provided by the roadless areas of the Nantahala and Pisgah National Forests, including solitude, scenic integrity, water quality, wildlife habitat, cultural traditions, and primitive and unconfined outdoor recreation.

The Access Fund and the Carolina Climbers Coalition feel some of the inventoried areas have not accounted for changing and new recreational uses that may make the area less suitable for wilderness designation. These areas include the Lost Cove and Harper Creek Wilderness Study Areas; and Dobsons Knob Extension B, Panthertown Valley, and Cedar Rock Mountain designated as *May be Suitable Wilderness*. All of these areas deserve protection but the Access Fund and the Carolina Climbers Coalition believe that alternate designations are more appropriate. Please see below for our specific recommendations.

We are also pleased to support shared recommendations from our ongoing work alongside a diverse group of forest stakeholders representing recreation, conservation, wilderness, wildlife, and local business interests. This collective proposal advocates for a new Grandfather National Recreation Area, a new Pisgah National Recreation Area, and new Wilderness designations on 109,961 acres of the Nantahala-Pisgah National Forest.<sup>1</sup>

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<sup>1</sup> NRA MOU\_121415 submitted to NPNF planning staff via email by Brent Martin, Wilderness Society, on December 14, 2015.

## **Access Fund**

The Access Fund is a national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment. A 501(c)(3) non-profit and accredited land trust supporting and representing millions of climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is the largest US climbing advocacy organization with over 11,000 members and 100 affiliates. The Access Fund provides climbing management expertise, stewardship, project specific funding, and educational outreach.

## **Carolina Climbers Coalition**

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](http://www.carolinaclimbers.org).

## **Climbing and the Nantahala-Pisgah National Forest**

Climbing is a significant, historic and popular recreational use of the Nantahala-Pisgah National Forest (NPNF). Climbing areas like Big Lost Cove Cliff and Linville Gorge provide premier climbing opportunities that represent the archetype of unconfined primitive wilderness recreation. Other classic and popular areas like Looking Glass, Table Rock and Lost Cove Boulders offer front country climbing experiences that are nationally renowned and valued by climbers. The many climbing opportunities in the NPNF 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.

Management areas defined through this plan revision process will dictate the management strategy for specific zones within the Forests. The Access Fund and CCC are concerned that specific boundaries and definitions associated with certain management areas may not appropriately support climbing and other forms of human-powered recreation.<sup>2</sup> We welcome the

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<sup>2</sup> The ability of climbers to use a *de minimus* number of fixed anchors is necessary to experience Wilderness climbing. For the Access Fund's position on fixed anchors, see this [link](#). Currently, there are several established climbing areas within the Forests' designated wilderness. The Access Fund and CCC agree that there is a need to update wilderness management direction and strongly recommend that future wilderness management include provisions that recognize rock climbing as a legitimate wilderness activity and the conditional use of fixed climbing anchors as

opportunity to recommend some changes that both optimize opportunities for human-powered recreation and support the Forest's mission. In short, instead of recommending wilderness designation we feel that many climbing areas within the NPNF are more appropriately zoned as MA-3 (Backcountry), MA-5 (SIAs), MA-6 (WSAs and RWAs) and MA-10 (Concentrated Recreation Areas), among others. See more detail below.

### Comments

A required part of the NPNF's Forest Plan revision process includes identifying and evaluating lands that may be suitable for inclusion in the National Wilderness Preservation System and determining whether to recommend any such lands for wilderness designation. The current evaluation comment period is focused on the special values of each particular area. These comments provide input on which areas we think can best meet the whole spectrum of social and ecological needs, including Wilderness and recreation. Because of existing use patterns, the presence of fixed anchors, or otherwise the Access Fund and CCC believe that a number of climbing areas do not consistently meet the four criteria for evaluating the wilderness characteristics: 1) apparent naturalness, 2) outstanding opportunities for solitude or for a primitive and unconfined type of recreation, 3) ecological, geological, or other features of scientific, educational, scenic, or historical value, and manageability to preserve its wilderness characteristics. We recommend the following management designations for climbing areas that are either existing WSAs or evaluated as *May be Suitable Wilderness*.

The USFS has designated Lost Cove and Harper Creek as Wilderness Study Areas. Accordingly, we suggest these areas instead be recommended for inclusion in a proposed Grandfather National Recreation Area and zoned Backcountry. Dobsons Knob Extension B, Panthertown Valley, and Cedar Rock Mountain were evaluated in the inventory as *May be Suitable Wilderness*. The Access Fund and CCC believes that Dobsons Knob Extension B and Panthertown Valley should be zoned Backcountry, and Cedar Rock Mountain should be part of the proposed Pisgah National Recreation Area and zoned Backcountry. In this way these outstanding climbing areas will be receive a high degree of protection and allow for an appropriate level of recreational activity.

#### I. Recommendations for Climbing Resources in Established Wilderness Study Areas

##### Lost Cove and Harper Creek

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appropriate. Fixed anchors are necessary tools for climbing and the local ethic dictates judicious use of fixed anchors and honors the current prohibition against power drills in designated wilderness. The Access Fund and CCC fundamentally believe that the ability of climbers to place a *de minimus* number of wilderness fixed anchors is a privilege worth protecting because it embodies "outstanding opportunities for solitude or a primitive and unconfined type of recreation."<sup>2</sup> Many federal public lands have included such provisions in their management plans and we recommend that the Forests include recognition that conditional use of fixed anchors is appropriate within the revised Nantahala and Pisgah Land Management Plan.

The Nantahala-Pisgah National Forests designated for Lost Cove and Harper Creek as Wilderness Study Areas. There are several established climbing areas within these two areas. Lost Cove provides ice climbing, front country bouldering, and backcountry multi-pitch and single-pitch traditional rock climbing routes. Harper Creek provides front country top-roping opportunities at the popular Little Lost Cove Cliff, and a variety of dispersed front and backcountry bouldering and single pitch climbing opportunities.

We recognize that the Harper Creek and Lost Cove Wilderness Study Areas offer outstanding opportunities for solitude and recreation. In particular, Harper Creek and Lost Cove Wilderness Study Areas contain significant, nationally renowned rock climbing resources. We also recognize the suitability of these areas for other forms of recreational use. Accordingly we recommend that NPNF redesignate Harper Creek and Lost Cove as part of the proposed Grandfather National Recreation Area, and manage these areas to protect their special backcountry and wilderness values through NRA management or a combination of Backcountry, SIAs, and ecological restoration management zones, among others.

## **II. Recommendations for Climbing Areas Evaluated as May be Suitable Wilderness**

Dobsons Knob Extension B, Panthertown Valley, and Cedar Rock Mountain were proposed in the inventory as *May be Suitable Wilderness*. Dobson's Knob and the west-facing mountain flank described as Dobson's Knob Extension B are home to multiple climbing resources that offer opportunities for bouldering, single pitch climbing and ice climbing. Specific areas include Black Fork, Linville Cavern boulders and Chossy Mountain. Known regionally as the Yosemite of the East because of the many impressive, tall granite cliffs, Panthertown Valley is home to Big Green, a historic backcountry climbing resource with adventurous single and multipitch routes on high quality granite. The Cedar Rock Mountain area contains a wide variety of distinct granite cliffs offering scenic views and fantastic, regionally popular backcountry single and multi-pitch climbing. Specific climbing areas include Cedar Rock, Stone Depot, John Rock, and Cathey's Creek Crag.

We do not support wilderness recommendations for Dobson Knob, Panthertown Valley, or Cedar Rock Mountain 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. See footnote 1 regarding the management of wilderness fixed anchors. In addition to popular rock climbing resources, these areas are host to other recreational uses like hunting, past and current vegetation management, the use of seasonal roads, and even have power lines. Because of these conditions and use patterns we believe the climbing opportunities and the other uses of these areas will be more effectively managed as MA-3 Backcountry.

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The Access Fund and CCC appreciate this opportunity to provide comments on the Nantahala-Pisgah Forest Plan Revision-Wilderness Inventory Area Evaluation, and thank you for considering our input and recommendations. We are very much interested in remaining engaged in the planning process. Our experience, expertise,<sup>3</sup> and resources can assist NPNF planners to develop management policy that protects natural resource values and maximizes recreational access. In particular our specific knowledge of specific climbing areas throughout the planning area can help the NPNF with its wilderness evaluation and recommendation process. In sum, we recommend The USFS re-designate Lost Cove and Harper Creek as part of the proposed Grandfather National Recreation Area and zoned Backcountry; Dobsons Knob Extension B, Panthertown Valley be designated as Backcountry; and Cedar Rock Mountain incorporated into a Pisgah National Recreation Area and zoned Backcountry. Please contact us for further assistance developing climbing management policies for the wilderness of the Forest.

Sincerely,



Zachary Lesch-Huie  
Southeast Regional Director  
Access Fund



Brian Payst  
President  
Carolina Climbers Coalition

cc: Brady Robinson, Executive Director, Access Fund  
Carolina Climbers Coalition board of directors  
Erik Murdock, Policy Director, Access Fund

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<sup>3</sup> Our publication, Climbing Management: A Guide to Climbing Issues and the Development of a Climbing Management Plan [https://www.accessfund.org/uploads/ClimbingManagementGuide\\_AccessFund.pdf](https://www.accessfund.org/uploads/ClimbingManagementGuide_AccessFund.pdf), and website [www.climbingmanagement.org](http://www.climbingmanagement.org), have both proven to be a useful tool for land managers across the country.