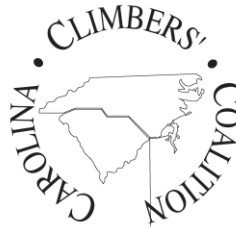




Protect America's Climbing



April 30, 2013

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

**RE: Access Fund and Carolina Climbers' Coalition Assessment Comments for
Nantahala and Pisgah National Forests Land and Resource Management Plan
Revision**

Dear Forest Planning Team,

The Access Fund and Carolina Climbers' Coalition welcome this opportunity to contribute to Assessment Phase of the Nantahala and Pisgah National Forests Land and Resource Management Plan (the Plan) revision. 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 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 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 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 Forests' existing climbing management is generally effective. Local climbers and the Carolina Climbers' Coalition maintain annual communications with Forests' staff to address climbing related issues; educate the climbing community regarding the Forests' general and area-specific climbing policies, appropriate rock climbing practices, and sustainable recreational use of the resource. CCC organizes volunteer stewardship and trail days to help manage climbing related impacts.² Current climbing management allows sufficient recreational access while protecting natural and cultural resource values. For example, seasonal peregrine closures at Whiteside, N.C. Wall, and other cliffs successfully balance peregrine falcon protection with recreational access.

The Plan needs to acknowledge the legitimacy of fixed anchor use within the Forests. "A fixed anchor is defined as any piece of climbing equipment that is left in place to facilitate a safe ascent or rappel. Examples include, but are not limited to, bolts, pitons, and slings."³ Fixed anchors are an inherent and important part of climbing safely in front-country, backcountry, and wilderness. The local ethic is to use fixed anchors judiciously and the current prohibition against power drills in wilderness is the best means to minimize the unnecessary proliferation of bolts in designated wilderness areas. A stronger partnership between the Forests and local climbing community and a simplified project approval process will allow climbers to better mitigate climbing related impacts. Climbers want to contribute to the sustainable management of Forests' trails and natural resources.

Access Fund and CCC Assistance

The Access Fund manages the largest crowd-sourced list of wildlife related and other climbing closures in the country.⁴ 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.⁵ In many cases, climbers actively assist⁶ by maintaining trails, removing trash,⁷ and participating in the locating, monitoring, and reporting on species of concern.⁸ The Access Fund has 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*⁹ and website www.climbingmanagement.org, have both proven to be a useful tool for land managers across the country. The Access Fund, CCC and 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 Program¹⁰ or assistance from our Conservation Team¹¹ 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 the Nantahala and Pisgah National Forests. The Access Fund and CCC look forward to participating 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 telephone (303-545-6772 x113) or email (rd@accessfund.org) to discuss this matter further.

Best Regards,



s/ Scott Gilliam

R.D. Pascoe
Policy Director
Access Fund

Scott Gilliam
President
Carolina Climbers Coalition

Cc: Brady Robinson, Access Fund, Executive Director
Zachary Lesch-Huie, Access Fund, Southeast Regional Coordinator
Brian Payst, Carolina Climbers Coalition
Mike Trew, Boone Climbers Coalition
Mike Reardon, Carolina Climbers Coalition
Phillip Hoffman, Carolina Climbers Coalition

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

² Looking Glass Rock: All trails to the base have been maintained in Adopt-A-Crags, including the Nose Area, South Side, and North Side. Linville: Trails to the base of Table Rock and the Amphitheatre via the Mountains to Sea trail have been maintained through Adopt a Crags. The public trail leading from Nantahala NF land to the CCC property at Laurel Knob has been maintained by AF (JEEP Conservation Team) and CCC members. Whiteside's base trail as well as many more.

³ Definition from Joshua Tree National Park: http://home.nps.gov/jotr/planyourvisit/fixe_anchors.htm

⁴ <http://status.accessfund.org>.

⁵ www.climbingmanagement.org.

⁶ 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>.

⁷ In July 2011, the Access Fund launched a new Conservation Team that will spend ten (10) months a year traveling the country addressing conservation issues. *See* <http://www.accessfund.org/site/apps/nlnet/content2.aspx?c=tmL5KhNWLrH&b=5000939&ct=11053041>.

⁸ *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.

⁹ <http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/CM-web.pdf>.

¹⁰ http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000903/k.9722/Grants_program.htm.

¹¹ http://www.accessfund.org/site/c.tmL5KhNWLrH/b.7653393/k.AEEB/Conservation_Team.htm.