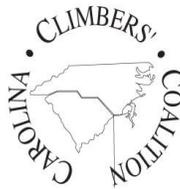




Protect America's Climbing



10/01/2017

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

**RE: Nantahala-Pisgah National Forest Plan Revision: Climbing Recommendations for Preliminary Plan Content**

Dear Forest Planning Team,

The Access Fund and the Carolina Climbers Coalition (CCC) welcome this opportunity to provide comments on the Nantahala-Pisgah National Forest Plan Revision, and summarize recent climbing-related proposals and recommendations the Access Fund advanced in the respective collaborative planning groups, The Nantahala-Pisgah Forest Partnership ('The Partnership') and The National Forest Foundation facilitated Forum group ('The Forum').

**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 7.2 million 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 15,000 members and 110 affiliates. The Access Fund provides climbing management expertise, stewardship, project specific funding, and educational outreach. Access Fund maintains an active Memorandum of Understanding with the United States Forest Service.<sup>1</sup>

**Carolina Climbers Coalition**

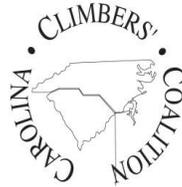
Carolina Climbers Coalition (CCC) is a local 501(c)(3) non-profit climbing organization whose

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<sup>1</sup> USFS-Access Fund MOU: <https://www.accessfund.org/uploads/Access-Fund-USFS-MOU-2014.pdf>.



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mission is preserving, protecting and expanding climbing opportunities in North and South Carolina. Founded in 1995, the CCC works with municipal, state and federal land managers to steward climbing areas and to protect climbing access. The CCC also works with private landowners, and has purchased four 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; Buckeye Knob boulders in Vilas, NC, 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).

### **Collaborative Planning and Proposals**

Access Fund and CCC recognize and applaud Nantahala-Pisgah National Forest (NPNF) for an ongoing commitment to collaborative planning through the public meetings, robust outreach and a high level of participation in the respective collaborative stakeholder groups, The Partnership and The Forum. Sharing pieces of the draft plan as a work in progress was very useful and provided valuable transparency. Information and discussion provided by NPNF staff who were present at public meetings and collaborative groups continue to be helpful and is appreciated by the climbing community as we work together to shape a new Forest Plan.

We have actively participated in The Partnership and The Forum. As members of these respective groups we are also pleased to support their shared recommendations from our ongoing work alongside a diverse group of forest stakeholders representing many diverse interests including recreation, conservation, timber, wilderness, wildlife, and local businesses.<sup>2</sup> The underscored recommendations outlined below have received full support from The Partnership and partial support in The Forum where proposal review remains in progress.

### **Wildlife and Vegetation**

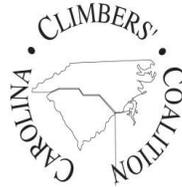
Conservation of the climbing environment is central to Access Fund's and CCC's missions and programs. Access Fund and CCC maintain longstanding partnerships with biologists and local,

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<sup>2</sup> See the Nantahala-Pisgah Forest Partnership's *Proposals for the Nantahala Pisgah National Forest Plan Revision on Preliminary Plan Content, Geographic and Management Area Building Blocks* document submitted to the NPNF Planning Team by email on September 30, 2017. A complete formal summary of proposals from The Forum has yet to be submitted, however The Forum made progress on this front at their meeting on September 25, 2017 through a complete review and of all members' proposals.



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state and federal land managers to support land management which provides both climbing access and protection for wildlife and other natural resources. Cliff vegetation and cliff-nesting raptors, such as peregrine falcons, are two important focus areas for our management support, research, education, and land manager collaboration. In general, necessary closures if needed should be science and monitoring based, site-specific, and flexible to accommodate changes in wildlife behavior, the environment or recreational use patterns.

### *Peregrine Falcons*

Regarding peregrine falcon protection and climbing management, we recommend changes to corresponding Geographic Area goal language in the Eastern Escarpment, Pisgah Ledge, and Highland Domes GAs; and Forestwide in the Management Approach language for plan chapters Threatened and Endangered Species and/or Species of Conservation Concern.

Recommendation - Continue to support conservation and protection of peregrine falcons through monitoring, seasonal closure orders on rock faces, and collaboration with the climbing and recreation community.

### *Cliff Plants and Vegetation*

Regarding recreation management and protection for cliff-area plants and vegetation, we recommend changes to the corresponding Geographic Area goal language, and Forestwide in the Management Approach language for the Threatened and Endangered Species and/or Species of Conservation Concern plan chapters.

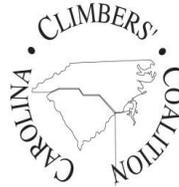
Recommendation - Maintain the integrity and resiliency of rare rock outcrop plant communities through site specific management, user group collaboration, stewardship and education.

### **Climbing Fixed Anchors**

Early in the NPNF Forest Planning process Access Fund and CCC identified climbing fixed



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anchors as an important topic to address in the NPNF plan revision.<sup>3</sup> Past NP Forest Management Plans have not addressed or included guidance on climbing fixed anchors, despite continuous and growing climbing use, and climbing fixed anchor use, for more than 70 years. Climbing fixed anchors are essential for the climbing experience, safety, and a recognized management tool for resource protection and management of visitor use and flow. Replacement of old fixed anchors on NPNF is a maintenance need broadly recognized by the climbing community.<sup>4</sup> We are therefore recommending new guidance for climbing fixed anchors as a new Standard for Wilderness and non-Wilderness areas of the Forest, along with the USFS definition.

After collaborative work with the climbing community, input and support from The Forest Partnership and The Forum<sup>5</sup>, and ongoing collaborative work with national-level USFS Recreation, Heritage and Volunteer Resources staff, we specifically recommend new guidance for climbing fixed anchors as a new Standard for Wilderness and non-Wilderness areas of the Forest, along with the USFS definition. We recommend this new guidance be included as Standard under Recreation Settings: Opportunities. The Wilderness specific guidance may also be included in the Wilderness management section of the plan.<sup>6</sup> We recommend including the USFS definition of climbing fixed anchors definition in the appropriate Appendix or definitions section of the Plan. These recommendations are listed below.

**Recommendation** - Climbing Fixed Anchors Definition: Climbing fixed anchors are defined as climbing equipment (e.g., bolts, pitons or slings) left in place to facilitate ascent or descent of technical terrain (USDA Forest Service, 1999).<sup>7</sup>

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<sup>3</sup> See Access Fund-CCC comment letter dated April 30, 2013. We have also presented on the topic of fixed anchors at Forest Partnership and Forum meetings.

<sup>4</sup> Many of the educational and commercial organizations who provide climbing programs or guiding through NPNF climbing permits also recognize this need for fixed anchor replacement.

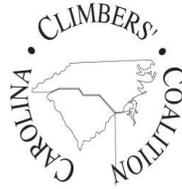
<sup>5</sup> The Partnership has given full support for this proposal. The Forum's review of the proposal is in progress.

<sup>6</sup> For additional guidance regarding Wilderness climbing, see again the Access Fund-CCC Wilderness Inventory comment letter dated 12/15/2015. The ability of climbers to use a *de minimus* number of fixed anchors is necessary to experience Wilderness climbing. Currently, there are several established climbing areas within NPNF's designated wilderness and WSAs. 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 use of fixed climbing anchors as appropriate.

<sup>7</sup> Federal Register, Vol. 64, No 209, Department of Agriculture, 36 CFR Chapter II, Forest Service, Negotiated Rulemaking Advisory Committee; Fixed Anchors in Wilderness, at: <http://www.gpo.gov/fdsys/pkg/FR-1999-10-29/pdf/99-28219.pdf>



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Recommendation - Non-Wilderness Management Areas: Fixed anchors are essential for climbing, and climbers may use, place and replace fixed anchors. Fixed anchors for climbing can be placed in such a way to protect natural resources, improve social conditions, enhance safety, and provide outstanding recreational opportunities. Fixed anchor hardware should be climbing-specific and comply with modern, currently accepted standards. Fixed anchors should be camouflaged to match the surrounding environment.

Recommendation - Wilderness: Fixed anchors are essential for climbing, and climbers may use, place and replace fixed anchors. Fixed anchors for climbing can be placed in such a way to protect natural resources, improve social conditions, enhance safety, and provide outstanding recreational opportunities. In Wilderness, climbers should use fixed anchors as a last resort, where removable anchor placements are not viable. Motorized drills are prohibited for placement of new fixed anchors in Wilderness. Fixed anchors should be camouflaged to match the surrounding environment.

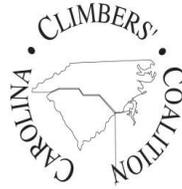
### **Climbing Stewardship and Erosion Control**

NPNF supports a large number recreational visitors and many, diverse recreational uses and sites. There are recreational resources and uses not serviced by designated sites, trails or other Forest transportation systems. For example, scenic overlooks, waterfalls, swimming holes, boating put-ins and take-outs, climbing areas, rockhounding sites, fishing access along rivers, or specific places managed for hunting. These non-system access routes and sites may require greater management action and mitigation to achieve or improve sustainability. Designation or closure are available as management actions, however they are not always feasible, necessary or desirable solutions. Erosion control and other mitigation strategies like education offer effective alternatives that have proven to be successful on National Forests across the U.S. and here on NPNF.

A stand-out example for this type of work on NPNF is the Pisgah District Davidson River project, being carried out in partnership with Trout Unlimited. This project is a model and precedent for how the Forest may authorize erosion control, among other resource management tools, to mitigate impacts, protect water quality and also improve sustainability of recreational use and access that, in many cases, falls outside designated trails, roads, parking spots or other sites. This same approach can be applied to other sites and routes, and a new recommended



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guideline clarifying the appropriate use of erosion control would enhance both resource protection and sustainable recreational access and management. It would also provide a new avenue for increased collaboration and public-private partnership, bringing outside funding and other resources to bear on needed Forest management.

After constructive and useful consideration, input and changes from the climbing community, The Partnership and The Forum, we recommend an Erosion Control/Mitigation be added to the Recreation: Trails section of the plan under a Management Approach, and/or as an approach in the Trails section for Forestwide Objectives, with the following language:

Recommendation - User-created access routes that are not part of the Forest's designated trail system (social trails and other overland travel routes) are critical to providing recreational access to dispersed recreation sites like climbing areas, scenic overlooks, boating access, waterfalls, and access for hunters and anglers. They also pose a management and stewardship need. We recommend that the Forest Service have the option of utilizing erosion control/mitigation activities to sustainably manage these non-system access routes.

In making this recommendation, we want refer NPNF to other successful examples and precedents where Access Fund and the following National Forests have applied erosion control work and undertaken successful climbing stewardship projects: Coronado NF, AZ (Mt. Lemmon and Cochise Stronghold); Bighorn NF, WY; Arapaho-Roosevelt NF, CO; El Dorado NF, CA; Uinta-Wasatch-Cache NF, UT; and Manti La Sal NF, UT.<sup>8</sup> The majority of these projects have been and continue to be accomplished by volunteers, our local climbing organization partners, and Access Fund's Conservation Teams, with funding support obtained through grants or private sources. And we also again want to point to the success of the Davidson River project and Trout Unlimited's partnership, and highlight it as a promising example for how appropriate erosion control activity could enhance climbing area stewardship, sustainability and public-private partnership.

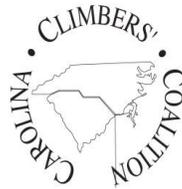
We recognize that a wide range of trail management strategies may be appropriate for sustainable recreation management and access. Access Fund is a longstanding supporter of the

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<sup>8</sup> Contact Access Fund's Stewardship Director Ty Tyler for more information and documentation on these USFS climbing stewardship projects: [ty@accessfund.org](mailto:ty@accessfund.org).



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Trail Stewardship Act, and both the Access Fund and CCC are willing to provide volunteers and resources to that end.

## **Management Areas**

### *Special Interest Areas*

Recreation is listed as a potential defining characteristic for SIAs: unique attributes may be recreational, should remain persistent over time, and can benefit from specific management direction to maintain the special attributes of the resources in question. We noted that few Special Interest Areas (MA-5) utilize recreation as a defining unique attribute. In fact only two SIAs are designated for unique recreational attributes, despite significant, longstanding recreational use within a majority of the listed SIAs. Linville Gorge, Looking Glass, and Whiteside Mountain—three of the Forest's most significant and highly visited recreational sites—are just three outstanding examples where recreation should be recognized as one of the unique attributes that warrants their SIA status.

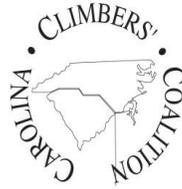
In recognition of their unique recreational attributes, including rock and ice climbing, we recommend Recreation be listed in addition to the other qualifying criteria for the SIAs listed below. Climbing and recreation at these areas has remained persistent over time—in some cases for more than fifty years—and could therefore benefit from specific management direction to maintain the special attributes of the climbing resource. This following list makes additions to our comment letter dated January 14, 2015, based on further climbing community input, and input and support from The Partnership and The Forum.

Recommendation: Add and include Recreation as a new unique attribute and qualifying criteria for the existing NPNF Special Interest Areas listed below.

- Black Mountains
- Craggy Mountains/Big Ivy
- Linville Gorge
- Bonas Defeat Gorge
- Cullasaja Gorge
- Ellicott Rock-Chattooga River Gorge
- Scaly Mountain and Catstairs



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- Whiteside Mountain
- Whitewater Falls
- Dismal Falls
- Fork Ridge/Mount Hardy
- John Rock
- Black Rock Mtn/Granite City
- Looking Glass Rock
- Linville Dolomite
- Fodderstacks
- Upper Santeelah

Including recreation in these areas' unique attributes is important and needed to more accurately account for the unique characteristics which make these areas special. Doing so will memorialize needed management plan revisions that can substantiate the continued maintenance of valuable recreation and climbing opportunities.

#### *Matrix, Interface and Ecological Restoration*

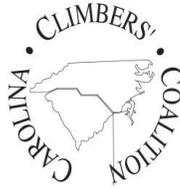
We recognize the draft Interface and Matrix MAs as useful constructs to guide management on NPNF. We also recognize merits in The Partnership's NEPA Alternatives proposal, and the ecological restoration goals and MA described therein. We share some Partnership member's concerns of impeding progress and plan implementation when an alternative approach of adapting ecological restoration guidelines to the Interface MA could prove successful. In general draft MAs such as Interface or Ecological Restoration should fully account for the social and human dimension, including recreation and associated Desired Conditions, Standards and Guidelines and other benchmarks.

#### *All Management Areas*

NPNF supports an enormous diversity of climbing experiences and sites. There are climbing areas located in nearly all of the current and draft MAs, including Matrix, Interface, Backcountry, Wilderness, Wilderness Study Areas, Special Interest Areas, Wild & Scenic Rivers,



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and National Scenic Byways. Our area-specific knowledge of climbing areas throughout the planning area, including climbing area maps<sup>9</sup>, may assist the NPNF planning team.

\* \* \*

The Access Fund and CCC appreciate this opportunity to provide comments on the Nantahala-Pisgah Forest Plan Revision and thank you for considering our input and recommendations. We will remain engaged in the planning process and continue to offer our experience, expertise, and resources to assist NPNF planners in developing management policy that protects natural resource values and maximizes recreational and climbing access.

Sincerely,

Zachary Lesch-Huie  
Southeast Regional Director  
Access Fund

Brian Payst  
President  
Carolina Climbers Coalition

cc: Brady Robinson, Executive Director, Access Fund  
Erik Murdock, Policy Director, Access Fund  
Katie Goodwin, Public Land Associate, Access Fund  
Laura Boggess, Board Member, Carolina Climbers Coalition

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<sup>9</sup> See climbing area map here, developed with support from Outdoor Alliance, with The Partnership input:  
<https://outdooralliance.maps.arcgis.com/apps/MapSeries/index.html?appid=97e2986b355242438b1c6eb8c4f3897a>