



April 25, 2014

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

RE: Access Fund Comments on *Revising the Nantahala and Pisgah Land Management Plan – Preliminary Need to Change the Existing Land Management Plan*

Dear Forest Planning Team,

The Access Fund and Carolina Climbers' Coalition welcome this opportunity to comment on the document *Revising the Nantahala and Pisgah Land Management Plan – Preliminary Need to Change the Existing Land Management Plan* (the Document). 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 2.3 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 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

Recreation and Economics

The Access Fund and CCC are encouraged that the Document identifies the overarching need “to better recognize and potentially enhance the role of the Nantahala and Pisgah NFs in supporting local economies through both commodity production, including timber and other multiple-use products, and the service-based economy that includes recreation and tourism.”² Recreation is a key element to service-based economies. The high-quality climbing destinations on the Forests will continue to attract local and visiting climbers, and significantly contribute to local economies. Rock climbing participants continue to grow in proportion to other recreation user groups and it is likely that public demand for rock climbing will increase relative to other outdoor activities in the near future.³ In fact, several recent economic studies indicate the benefits of climbing on local communities.⁴

Rock climbing also has a significant impact on quality of life and the Access Fund and CCC applaud the Forests for recognizing “the need to promote outdoor physical activities, especially among youth.”⁵ The Access Fund is committed to educating young climbers on best practices while climbing and visiting natural landscapes and wilderness, and has recently initiated a new education program directed at facilitating environmentally responsible transitions from indoor gym climbing to climbing outdoors – a new trend that is driven by the popularity of indoor climbing gyms. In that light, we hope that the Forests will continue to manage rock climbing resources in a manner that balances access to recreation and conservation of the climbing environment.

Designated Areas

The Document identifies the need to “update plan direction for managing wilderness.”⁶ 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 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.”⁷ 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.

In addition, it should be noted that there are a few potential wilderness areas that include established climbing resources (e.g., Dobson Knob, Upper Wilson Creek and Lost Cove WSA). The Access Fund and CCC hope that the Forests will consider those climbing areas as established and legitimate while assessing the potential for wilderness designation and wilderness management.

There are also several climbing areas located within Special Interest Areas and potential Special Interest Areas. The Access Fund and CCC recommend that the Forests specifically recognize climbing as an appropriate activity when the Forests “clarify and update plan direction regarding designated areas including Special Interest Areas.”⁸

Existing Climbing Management

The Forests’ existing climbing management is generally effective. Local climbers and the CCC 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.⁹ 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. In sum, 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.¹⁰ 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.¹¹ In many cases, climbers actively assist¹² by maintaining trails, removing trash,¹³ and participating in the locating, monitoring, and reporting on species of concern.¹⁴ 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*¹⁵, 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 Program¹⁶ or assistance from our Conservation Team¹⁷ 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 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 email (erik@accessfund.org) to discuss this matter further.

Best Regards,



Erik Murdock
Policy Director
Access Fund

Cc: Brady Robinson, Access Fund, Executive Director
Zachary Lesch-Huie, Access Fund, Southeast Regional Coordinator
Brian Payst, Carolina Climbers Coalition, President

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

² Revising the Nantahala and Pisgah Land Management Plan – Preliminary Need to Change the Existing Land Management Plan, page 1

³ Cordell, H.K. (2012). *Outdoor Recreation Trends and Futures: A Technical Document Supporting the Forest Service 2010 RPA Assessment*. US Dept. of Agriculture, National Forest Service, Southern Research Station, p. 184.

⁴ <http://www.climbingmanagement.org/research/economic-benefits-of-climbing>

⁵ Revising the Nantahala and Pisgah Land Management Plan – Preliminary Need to Change the Existing Land Management Plan, page 6

⁶ Id., page 4

⁷ Wilderness Act of 1964, Pub. L. 88-577, § Sec. 2(c)(2).

⁸ Revising the Nantahala and Pisgah Land Management Plan – Preliminary Need to Change the Existing Land Management Plan, page 4

⁹ 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 and other trails.

¹⁰ <http://status.accessfund.org>.

¹¹ www.climbingmanagement.org.

¹² 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>.

¹³ 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>.

¹⁴ *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.

¹⁵ <http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/CM-web.pdf>.

¹⁶ http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000903/k.9722/Grants_program.htm.

¹⁷ http://www.accessfund.org/site/c.tmL5KhNWLrH/b.7653393/k.AEEB/Conservation_Team.htm.