

## Black Mountains

12,473 acres

Part of the South Toe River basin, the Black Mountain range has unique high-elevation communities including virgin spruce-fir forest at upper elevations that contain numerous rare species such as mountain paper birch, the Appalachian cottontail, and arctic bentgrass. Hikers will experience different types of old-growth forest along the trail loop. The Black Mountains area is on the Appalachian Ranger District of the Pisgah National Forest, southeast of Burnsville, NC in Yancey County. The area lies immediately north of and Mount Mitchell State Park (which borders the area). The Black Mountains have exceptional wilderness characteristics.

### What's at stake for this area?

The Forest Service is proposing to consider 11,447 acres in only one of the four draft alternatives (Alternative C) which means that the Black Mountains won't be recommended as wilderness to Congress if the Forest Service selects Alternative A, B, or D.

### Highlights from this evaluation

- The Forest Service has taken an unreasonable approach to assessing the apparent naturalness of this area.
- The Forest Service needs to appropriately document the opportunities for solitude and primitive recreation.
- The evaluation claims that you can hear blasting from a nearby gravel quarry.
- The evaluation claims that the topography limits recreation use to the ridgetop along the Crest Trail.
- Mt. Mitchell State Park is portrayed as a detraction from the wilderness characteristics of the Black Mountains.
- "Sights and sounds" from outside the area are exaggerated.
- The evidence of historical mining should be perceived as a unique or outstanding historical quality, rather than a detraction from wilderness characteristics. The Ray Mine Area needs to be excluded.
- There are 3,064 acres of old-growth forest in the area, but the evaluation only mentions the presence of forest with "old growth characteristics"
- The Forest Service implies that the boundary configuration of the Black Mountains area is not conducive to management as wilderness.

### Evaluation of Wilderness Characteristics and Corresponding Talking Points

Use any first-hand experience that you have to talk about the trails that you have used in this area. Talk about how you recreate in the area. Emphasize the opportunities for solitude and recreation that it provides.

USFS Evaluation	How to Comment	TWS Evaluation Response
<b>Apparent Naturalness</b>		
The area has a history of railroad logging in the early 1900's, followed by wildfires, non-native insect infestations and acid deposition; all of which have	*Does this area seem natural to you? This evaluation overemphasizes the impact of historical factors on current apparent naturalness, but the	It's unclear how these historical factors play into evaluation of apparent naturalness. They would be largely irrelevant to the average user, the reference for this characteristic, who

altered the extent, structure, and composition of its spruce-fir and hardwood forests. Remnants of railroad grades are still visible on both sides of the mountain, and one is now used as the Buncombe Range Horse Trail and Mountains to Sea Trail. The area has 12.4 miles of NFS Trails managed as Trail Class 2 for hiking, 4.7 miles of Trail Class 2 horse trail, and 2.8 miles of Trail Class 3 horse trail. Trails of these classes are minimally developed, with native surface tread and few structures. There was a helicopter landing zone in the north near Bowlen's Pyramid, but it has been allowed to grow up in recent years; as has its primitive access trail. These past impacts and features have blended or recovered to the point where they are no longer substantially noticeable to the average viewer. In the northwest part of the area, Bowlen's Creek serves as a secondary water supply for the Town of Burnsville. Although the access road (NFSR 5578) terminates outside the evaluation area, there is a primitive roadbed extending approximately one mile into the area which is occasionally used by the Burnsville Water Department for access to a diversion dam and water intake structure. Under the roadbed is a 6" water main extending to State Road 1109. The northern and western sides of the area have a history of mineral and mica mining, with at least eight documented mine locations. There are approximately four

average user will perceive this area as natural. Areas showing evidence of past logging will regain their apparent naturalness over time. The Eastern Wilderness Areas Act refuted the Forest Service's "purity theory" and mandates that the agency take a reasonable approach in assessing evidence of human activity and impact when considering the wilderness characteristics of an area.

\*Historical mining adds to the historical interest of the area and should be considered a unique historical quality.

\*Boundaries should be drawn to exclude the Ray Mine Area from the potential wilderness area.

would perceive the area as having a high degree of apparent naturalness. If pointed out, these historical factors could be points of interest at the recuperative power of Southern Appalachian forests. Such historical features used as bars for wilderness consideration were rejected by the Eastern Wilderness Areas Act's refutation of the "purity theory". The fact contained in the evaluation that "These past impacts and features have blended or recovered to the point where they are no longer substantially noticeable to the average viewer" should be emphasized more as the takeaway under apparent naturalness.

TWS and other groups are suggesting boundary adjustments that eliminate most if not all of the infrastructure listed, including the diversion dam and water intake structure, the Ray Mine area, and roadbeds in the Ray Mine area.

The historical mining noted in the area adds to the historical interest of the area. It certainly should not be considered a detriment to natural characteristics per a "purity theory" This was rejected by enactment of the Eastern Wilderness Areas Act.

miles of old roadbed and tramway which were used for mining exploration in south fork of Cattail Creek, and several mine shafts and associated roads in the Ray Mine area. None of these roadbeds are NFS roads, but some of them have been regraded recently so that steel grates could be installed over mine shaft entrances for protection of bats and public safety. Ray Mine is a local and regional attraction for rock hounding in the mine spoil piles. Many of these features have a constructed and unnatural appearance.

**Opportunities for Solitude or Primitive & Unconfined Recreation**

With its remote and rugged character, the Black Mountains area offers many opportunities for solitude, and primitive and unconfined recreation. However, sights and sounds of civilization or high potential for user encounters do impact opportunities for solitude in certain locations or at certain times, but they are not pervasive across the entire area. Opportunities for unconfined recreation are also impacted to some degree because of the area’s relatively narrow shape and topography. The core area is traversed by a ridge running its entire length, while area boundaries are generally on steep side-slopes. This topography acts to limit recreation use on the side-slopes and focus users to the ridgetop along the Crest Trail; it also allows views of surrounding development in the adjacent valleys.

\*This evaluation goes into great detail about “unnatural” features, yet only briefly mentions the remote and rugged character of the Black Mountains area. The Forest Service should capture in greater detail the opportunities for solitude and primitive and unconfined recreation that the Black Mountains Area offers.

\*The evaluation needs to discuss in greater detail the semi-primitive, non-motorized core of this area, which is greater than 10,000 acres.

\*Tell the Forest Service about your experiences being in the Black Mountains, and how the area affords a sense of remoteness despite being close to civilization.

\*The Forest Service perceives Mt. Mitchell State Park as a detractor from the wilderness

The lack of any reference in the solitude characteristic description to the Semi-Primitive non-motorized (SPNM) core in the context of solitude for the area is odd. SPNM core is documented in the quantitative summary, but is not discussed. The area has a very large SPNM core by eastern standards. The SPNM core of the area is documented in the quantitative summary as almost 10,000 acres. However, we get a figure greater than 10,000 acres, even if the portion in the adjacent Bearwallow area is not considered. SPNM core is one of the more objective measures of solitude potential; it is insufficient to just document this in the quantitative summary; it is also an important factor that should be discussed under the solitude characteristics.

The evaluation reference to sights and sounds is ambiguous and troubling. While acknowledging that sights and sounds are not pervasive, the evaluation does seem to over-stress these. Possibility of sights and sounds

From the “Crest” looking east, there are residential developments, agricultural lands, a golf course resort, and an airstrip visible in the South Toe River Valley. Private lands to the west are generally forested, with some agricultural, residential, and commercial development visible in the Cane River Valley. There is also a gravel quarry to the northwest, and although it is not visible from the area, sounds from blasting are occasionally heard. Segments of the Blue Ridge Parkway are visible to the south and southeast from certain locations along the ridge. At the southwestern boundary, in the highly visited Mount Mitchell State Park, there are paved roads, parking lots, an observation platform, communication towers, and buildings visible. Outfitter and guide services also operate in the area, sometimes with large groups, and recreation events with hundreds of participants have been permitted in the past. Primitive types of recreation are the primary recreation uses in the Black Mountains area, including day-hiking, backpacking, horseback riding, viewing wildlife, hunting, and fishing. The Black Mountain Crest Trail is very popular with backpackers seeking a remote and challenging experience. The Crest Trail spans the entire length of the Black Mountains area from Mount Mitchell State Park in the south to Bowlen’s Creek in the north, with nine of its 11 miles within the area.

characteristics of the Black Mountains, but we believe that this adds to the need to recommend the Black Mountains for wilderness. The combined area offers a diversity of recreation experiences for people of all background and interests, from those who prefer an easy experience to others who want a backcountry, challenging experience.

\*Emphasize to the Forest Service that there are several recreation opportunities in the area beyond simply the Crest Trail along the ridgeline.

\*The Forest Service has stated that you can occasionally hear blasting from a gravel quarry in the northwest but, in our experience, that is not the case. Tell the Forest Service about your experiences in the area and whether or not you have heard blasting.

\*“Sights and Sounds” from outside of the area should not disqualify it from moving forward into analysis. We must preserve our last remaining wildlands, which will become increasingly rare as the population in the east continues to grow.

\*The evaluation makes claims about views of nearby communities, yet most of the views of communities are outside the Black Mountains area in the Bearwallow Inventory Area and the area

are present throughout the east, even in most designated wilderness areas. The references seem to echo the “purity theory” that was rejected in the Eastern Wilderness Areas Act. The opportunities for solitude are actually remarkably high in the Black Mountain area. While a visitor may be able to glimpse communities in the surrounding valleys, these fairly rare views tend to emphasize the fact that the area is removed and remote from these outside influences.

The discussion of opportunities for unconfined recreation is also ambiguous and somewhat misleading. The discussion of the topography limiting recreation use to the Crest Trail is not accurate. The area has several system trails on the side slopes: Woody Ridge Trail, Colbert Ridge Trail, and the Buncombe Horse Trail. The Mount Mitchell /Mtns to Sea Trail and the Higgins Bald Ground Trail just outside the area provide access to area trails from the Mount Mitchell area and the Black Mountain Campground. In addition, the non-system trail into the Middle Creek RNA and other off-trail options provide additional recreation opportunities. The entire area has numerous recreation opportunities, not just along the Crest. The Crest Trail does tend to unify these other trails and offer additional levels of challenge for those wanting multi-day or more challenging opportunities.

There are some views in the valleys from the side slope trails, although most of the opportunities for views of communities are outside the area in the Bearwallow area and the area between Bearwallow and the Black Mountain area. At any rate these very

<p>There are other challenging hiking trails in the area and the Buncombe Range Horse Trail, part of which is also designated the Mountains-to-Sea National Recreation Trail. There are no highly developed trails, mountain bike trails, or motorized trails in the area.</p>	<p>between Bearwallow and the Black Mountain area.</p> <p>*Talk about recreation opportunities beyond the Crest Trail. This evaluation states that the Black Mountain area’s relatively narrow boundary configuration, steep side-slopes, and central ridge tend to limit recreation use to the ridgeline.</p>	<p>occasional views should not be considered a detriment to solitude.</p> <p>Similarly, views of Toe Valley and Cane River communities from the Crest Trail are few and far between and do not by any reasonable standard detract from either opportunity for solitude or primitive recreation.</p> <p>We have been in the Black Mountain area frequently and have never heard blasts from the gravel quarry. We have also questioned a number of other people very familiar with the area who have never heard blasting noises while in the area. Any such sounds audible from the area would be very infrequent if they are audible at all.</p> <p>The proximity of Mount Mitchell State Park in and of itself should not be considered an impact to solitude and primitive recreation within the area. The state park has its own trail system that interconnects with the area’s trails. Use from Mount Mitchell tends to be self-limiting with visitors using the shorter park trails unless they want a more challenging wilderness experience. Any view of park development or sound from the park itself from inside the area would be extremely rare.</p>
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**Other Values - Unique or Outstanding Qualities**

<p>The Black Mountain area boasts some of the highest peaks in the east and is one of the most scenic places on the Pisgah National Forest. Its high-elevation ridge and spruce-fir forests are unique in the southern Appalachian Mountains. The spruce-fir ecozone is rare within the region and only survives in the cooler climates of higher elevations</p>	<p>*The ecological importance of this area alone warrants wilderness recommendation.</p> <p>*The old-growth in this area is understated in this evaluation. The Black Mountains aren’t home to forest with simply “old-growth characteristics.” There are, in fact, 3,064 acres of old-growth forest in the area.</p>	<p>In addition to what is noted in the evaluation about the Middle Creek NRA, this area was established to recognize unique old growth forest and important ecological communities.</p> <p>There is a total of approximately 3,064 acres of existing old growth forest within the Black Mountain area. The Black Mountain/Celo Knob and the Upper Bolens Creek Significant Natural Heritage areas lie within this area (a</p>
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<p>such as the Black Mountains. The Black Mountains area is one of the last strongholds for several rare species, including two federally-endangered animals and two animal species of conservation concern. Middle Creek Research Natural Area is within the Black Mountains area. This Research Natural Area serves as an outdoor laboratory to study natural systems. Designation as a Research Natural Area does not preclude consideration or recommendation for inclusion in the National Wilderness Preservation System; this management is consistent with the educational and scientific values of wilderness. Within the Research Natural Area, Middle Creek Falls is indicative of the area's diversity, supporting four rare plant species.</p>	<p>*The presence of two NC Significant Natural Heritage areas (Black Mountain/Celo Knob and Upper Bolens Creek) within this area are testament to its importance as a refuge for rare and threatened species:</p> <ul style="list-style-type: none"> <li>- Carolina northern flying squirrel</li> <li>- spruce-fir moss spider</li> <li>- northern long-eared bat</li> <li>- rock gnome lichen</li> <li>- peregrine falcon</li> <li>- Allegheny woodrat</li> <li>- southern rock vole</li> <li>- pygmy salamander</li> <li>- least weasel</li> <li>- alder flycatcher</li> <li>- numerous rare plants and bryophytes</li> </ul>	<p>total of 7,524 acres of State Natural Heritage Areas within this WIA).</p> <p>Opportunities to increase the ecological representation of ecological types that are currently under-represented in the Wilderness Preservation system include a variety of ecological types, especially Appalachian Cove Hardwood, Appalachian Hemlock-Hardwood; Appalachian Oak, Appalachian Oak – xeric; Appalachian Montane Oak, spruce-fir, and Small Stream and Riparian.</p> <p>Because the Blacks were formed by a younger upthrust (compared to the rest of the Blue Ridge), they offer a unique geology.</p> <p>This area's scenic qualities are unique to the east. Along with the adjacent Mount Mitchell State Park, the area contains 10 peaks over 6,000 feet - the greatest collection of 6,000 ft peaks in the Eastern US. With views of charismatic giants like Cattail Peak and Balsam Cone along the main ridgeline, views of the Blue Ridge to the south and east, and views of Big Butt to the west, the Blacks provide one of the most dramatic mountain landscape in the South.</p>
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**Size and Manageability**

<p>The Black Mountain area is roughly 2.5 miles wide at its widest point, and approximately nine miles long. The area is primarily a ridge-top with boundaries at mid-slope on each side, and there are several narrow fingers of ownership on the northeastern side. A non-NFS road extends approximately one mile into the area to the northwest, providing access to a municipal water intake at</p>	<p>*The Forest Service discussion implies that the boundary configuration of the Black Mountains area is not conducive to management as wilderness. In some places the area is almost 3 miles wide. With boundary adjustments proposed by TWS, the area is about 7 miles long. The non-NFS road and the Ray Mine area is excluded from the TWS proposed boundary.</p>	<p>In places the area is almost 3 miles wide. With boundary adjustments proposed by TWS, the area is only about 7 miles long. The non-NFS road and the Ray Mine area is excluded from the TWS proposed boundary.</p>
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<p>Bowlen’s Creek. The northern most extension of the area contains the Ray Mines and associated non-NFS access roads.</p> <p>With minor boundary adjustments to exclude these features, the area could be managed to preserve wilderness characteristics.</p>		
<p><b>Conclusion</b></p>		
<p>With most of the Black Mountains area in an Inventoried Roadless Area, botanical special interest area, and Research Natural Area, these protections have allowed it to retain many wilderness characteristics. It has opportunities for solitude across much of the area, although private development in the South Toe River valley can be seen from some locations, the sound of blasting can occasionally be heard from a nearby quarry, and parts of the area receive high visitation in peak use seasons. The area has opportunities for primitive and unconfined recreation in many locations, but the area’s relatively narrow boundary configuration, steep side-slopes, and central ridge do tend to limit recreation use to the ridgeline. The area has outstanding and unique values, such as being part of the highest mountain range in the eastern United States, having one of the best examples of a high elevation spruce-fir forest in the Southern Appalachian Mountains, and being a destination for viewing exceptional scenery. Also, within the Research Natural Area,</p>	<p>*While we agree that the Black Mountain area has outstanding wilderness characteristics, the conclusions in the evaluation that areas either have wilderness characteristics or not and the use of the conclusions as a decision to carry areas forward in analysis (or not) is problematic.</p> <p>*The Black Mountains have exceptional wilderness characteristics, as detailed in this evaluation, and should most certainly be recommended to Congress as wilderness in the revised Nantahala-Pisgah Forest Management Plan.</p>	<p>While we agree that the Black Mountain area has outstanding wilderness characteristics, the conclusions in the evaluation that areas either have wilderness characteristics or not and the use of the conclusions as a decision to carry areas forward in analysis (or not) is problematic. Conclusions in the evaluations that judge areas to have no wilderness characteristics are both factually wrong and procedurally inappropriate. All wilderness inventory areas have wilderness characteristics on a spectrum. Under the planning directives it is the task of the evaluation to “evaluate the degree to which” areas possess these wilderness characteristics. When the evaluation concludes that an area or a portion of an area “does not possess wilderness characteristics” this conclusion is false because all of these areas have demonstrable wilderness characteristics to some degree (often noted in other portions of the evaluation). This conclusion also avoids the task laid out by the directives for the evaluation to “evaluate the degree to which” areas possess these wilderness characteristics. Furthermore, this conclusion is being used as a decision point about which areas to take forward in analysis. Deciding which areas have sufficient wilderness characteristics to take</p>

scientific studies are conducted in this rare ecosystem to determine long-term species composition and abundance changes from environmental stressors. Manageability of the area could be improved with boundary adjustments to exclude Ray Mine and Bowlen's Creek municipal water intake, so the boundary was adjusted to best reflect the portion of the area with wilderness characteristics.

forward into analysis is the task of subsequent steps. This is clear from the Forest Plan directives as well as other guidance around Chapter 70. To conflate the evaluation process with the selection of areas to take forward in alternatives is a fundamental error in the process outlined in the directives.

The sights and sounds of the Toe Valley do not significantly affect the solitude of the Black Mountain area when evaluated by criteria in the directives and judged under reasonable standards established under precedent in the Eastern Wilderness Areas Act.