

Chunky Gal
7,785 acres

The Chunky Gal area in Clay County is a potential extension to the Southern Nantahala Wilderness. Standing Indian Campground is nearby, where several “blue blaze” trails lead up to the Appalachian Trail. Chunky Gal is located between US64 to the north and west, Deep Gap Road (NFSR71) to the east, and the Shooting Creek community to the west.

What’s at stake for this area?

The Forest Service is proposing to only analyze 3,774 acres in Alternative B and C. The area that will be analyzed excludes the northwest portion, a significant portion in the northeast (that was adjacent to the Southern Nantahala Extension Area) and another portion at the southwestern end of the inventoried area.

Highlights from this evaluation

- Much of this area is being dropped from analysis due to the presence of Forest Service Road 71D and a few wildlife openings.
- The evaluation completely understates the opportunities for solitude and primitive recreation here, even claiming that the Appalachian Trail detracts from solitude.
- The evaluation downplays the ecological significance of this area by underestimating the old growth acreage, presence of populations of rare plant species, and ignoring the fact that the unique ecosystems in this area would strengthen the National Wilderness Preservation System.
- The evaluation fixates on a “peninsula” created by US 64 around the northern portion of this area. Instead, the Forest Service should consider the complex of important areas as a whole, and the opportunity to hear to create a large block of protected land.

Evaluation of Wilderness Characteristics and Corresponding Talking Points

Use any first-hand experience that you have to talk about how you have used this area. Remember to be as specific and informative as possible.

USFS Evaluation	How to Comment	TWS Response to Evaluation
Apparent Naturalness		
Portions of the Chunky Gal area have natural appearing forests, and the Special Interest Areas at Riley Knob and Whiteoak Stamp are set aside because of old growth characteristics and intact high-elevation bog habitat, respectively. Much of the area has been managed for backcountry recreation and is untouched by recent timber or wildlife management. This is particularly true in the Inventoried Roadless Areas at	*There is more old-growth forest in this area than Forest Service data show: Chunky Gal contains 1,523 (not 450) acres of old-growth forest that needs to be protected. *The evaluation says that the presence of wildlife openings and Forest Service gravel roads detract from apparent naturalness. It is not appropriate to make	The Special Interest Areas at Riley Knob and White Oak Stamp would fit well within wilderness management. Chunky Gal contains 1,523 acres of old-growth both inside the special interest areas and outside. NFSR71D would affect natural conditions to some extent, but this could recover apparent naturalness if allowed to revert to natural conditions. Roads and wildlife openings should be documented, but the fact that the area includes a road

<p>Chunky Gal Mountain and Sharptop Ridge.</p> <p>Between Chunky Gal Mountain and Yellow Mountain is a closed low maintenance level road (NFSR71D) which is maintained as a linear wildlife opening over its entire length, and bisects the area almost to Southern Nantahala Wilderness. There are also recent timber management activities in the Yellow Mountain area. To the southwest between Sharptop Ridge and Bly Gap Trail are other NFS roads and recent timber harvests. These human modifications adversely affect naturalness in their immediate vicinities but do not affect apparent naturalness of the area as a whole.</p>	<p>management trade-offs during the evaluation.</p> <p>*The presence of Forest Service road 71D is being used as justification for dropping a significant portion of this area from analysis. Yellow Mountain portion of this area could be treated as its own extension area, with the area west of NFSR71D going forward.</p> <p>*The evaluation mentions the presence of multiple roads between Sharptop Ridge and Bly Gap trail. The only road within the area in the Sharptop Ridge area is NFSR6230C, which could be excluded from the boundary along with the inholding near Sharptop Ridge.</p>	<p>or a wildlife opening does not disqualify that portion of the area. It is not appropriate to consider management tradeoffs during the evaluation stage. The Yellow Mountain portion of the area is also contiguous with the existing wilderness so could go forward on its own with the road excluded.</p> <p>The only road within the area in the Sharptop Ridge area is NFSR6230C, which could be excluded from the boundary along with the inholding near Sharptop Ridge.</p>
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Opportunities for Solitude and Recreation

<p>The area offers opportunities for solitude, primarily in parts of the Chunky Gal Mountain and Sharptop Ridge IRAs. However, the adjacent US64 and NFSR71 encircle the area’s northern third and impact solitude with the sights and sounds of vehicles. Other impacts to solitude in this northern area are agricultural, commercial, and residential uses visible to the west in Shooting Creek community.</p> <p>Further to the southwest in the Eagle Fork Creek area, there are also views of private developments and farmlands. Other impacts to solitude come from the heavy use along the Appalachian Trail in the through-hiking seasons of spring and fall.</p>	<p>*If you have hiked the Chunky Gal trail or used this area in other ways, tell the USFS if and where “sights and sounds” from US64 and NFSR71 impacted your experience. We believe the impact of the roads is overstated.</p> <p>*In your comments, emphasize the amazing, long-distance and primitive recreation opportunities in this area. The Chunky Gal area provides a corridor between the Southern Nantahala Wilderness Area to Boteler Peak Roadless Area and beyond to the Tusquitee Roadless Area. You can hike AT → Chunky Gal Trail → Fires</p>	<p>The effects of US64 and NFSR71 and other outside developments are negligible except near the border of the area. Sights and sounds are not pervasive in this portion of the area and they certainly are not pervasive in the Chunky Gal area as a whole. These external sights and sounds are not disqualifying features under precedent set by the Eastern Wilderness Areas Act.</p> <p>It is hard to separate the solitude and recreational experiences in this area. Southern Nantahala, with these extensions, forms a hub for long-distance, primitive use, connecting other intact natural areas to the north and west.</p> <p>Chunky Gal Mountain provides a trail corridor to the Boteler Peak Roadless</p>
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<p>Outside these peak use seasons, visitor encounters would be less likely.</p> <p>The area offers many opportunities for primitive recreation, such as hiking, backpacking, hunting, fishing, and nature study. In areas adjacent to Southern Nantahala Wilderness, recreation users are unconfined with unfettered access to thousands of acres wild and unroaded NFS lands.</p> <p>Conversely, the area's northern "peninsula" encircled by US64 and NFSR71 confine recreation users to this relatively narrow strip of land. This boundary configuration and shape affects much of the northern area and is not conducive to providing unconfined recreation.</p>	<p>Creek Rim Trail. This is an amazing corridor for recreational and wildlife use that should be protected.</p> <p>*According to the evaluation, the Appalachian Trail detracts from opportunities for solitude. Tell the USFS about your experiences on or near the Appalachian Trail, and how it offers solitude and recreational opportunities. Proximity to the Appalachian Trail should not be justification for further reducing the area of the Chunky Gal Extension for analysis.</p> <p>*Regarding the "peninsula" created by US64 on the northern boundary: an area does not need to have outstanding opportunities on every acre in order to have wilderness characteristics.</p>	<p>Area and beyond to the Tusquitee Roadless Area.</p> <p>It also contains the Appalachian Trail, the Chunky Gal Trail and other day hiking trails.</p> <p>Proximity to the Appalachian Trail should not be justification for further reducing the area of the Chunky Gal Extension for analysis. During peak thru-hiking season on the Appalachian Trail, thru-hikers are not likely to leave the Appalachian Trail, thereby limiting the impact of thru-hikers on other trails such as the "blue blaze" trails leading up to the A.T. Portions of the Chunky Gal Extension should not be excluded based on heavy A.T. hiker use for half of the year because one can often walk on the A.T. in the winter without seeing another person.</p> <p>The Riley Knob Special Interest Area does not appear to be within the boundary of the area of the Chunky Gal extension that is proposed for analysis. As the directives explain, an area does not "need to have outstanding opportunities on every acre."</p>
<p>Other Values</p>		
<p>Although the area serves as a scenic backdrop for US64 and nearby communities, most of the area possesses common characteristics within the context of the Southern Appalachian Mountains.</p> <p>However, there are over 450 acres of unique old growth White Oak forest and high-elevation bog identified as Special Interest Areas within the Chunky Gal Extension area.</p>	<p>*The evaluation is downplaying the ecological significance of this area and surrounding area. Chunky Gal Mountain contains a sizeable resource of quality old growth forest: 1,523 acres (not 450) of old-growth within and beyond the White Oak Stamp Natural Area.</p> <p>*Riley Knob is home to one of the largest populations of the globally rare glade spurge.</p>	<p>Chunky Gal Mountain contains a sizeable resource of quality old growth forest: 1,523 acres of old-growth both within the White Oak Stamp Natural Area and outside it.</p> <p>White Oak Stamp contains a rare high elevation mountain bog. In fact, the bog complexes along the upper portion of the Nantahala River support a high diversity and abundance of amphibians and other wildlife – some of which are rare - so while the Nantahala Mountains possess</p>

	<p>*Protecting the Chunky Gal area (with minor border adjustments) would increase the representation of ecological types that are under-represented in the National Wilderness Preservation System [Appalachian Montane Oak, Appalachian Cove Hardwood, Appalachian Hemlock-Hardwood; Appalachian Oak, Appalachian Oak –xeric; Appalachian Bog and Fen, and Small Stream and Riparian.].</p>	<p>"common characteristics within the context of the Southern Appalachian Mountains" they are, in fact, quite unique and special.</p> <p>Riley Knob is home to one of the largest populations of the globally rare glade spurge.</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 Montane Oak, Appalachian Cove Hardwood, Appalachian Hemlock-Hardwood; Appalachian Oak, Appalachian Oak – xeric; Appalachian Bog and Fen, and Small Stream and Riparian.</p> <p>State Natural Heritage Areas are located wholly or partly within the extension: Chunky Gal/Riley Knob (portion is currently recognized as SIA)</p>
Size & Manageability		
<p>The Chunky Gal Extension area is approximately 7,785 acres in size and most of the southeastern border is adjacent to the Southern Nantahala Wilderness. The northern portion of the area is a long and relatively narrow "peninsula" encircled by US64 and NFSR71. Although the majority of area boundaries are adjacent to NFS lands, sights and sounds of US64 and nearby communities are evident from much of the area; especially in the northern third. This northern boundary configuration and adjacent land use adversely affect opportunities for unconfined recreation and for</p>	<p>*The impact of the "peninsula" created by Highway 64 is being overstated. Instead, the USFS should consider the size and shape of the area as though all of the potential extensions are included with the existing wilderness area to create one contiguous, large block of protected land. The potential extensions to the Southern Nantahala Wilderness would add to the value and integrity of the existing Southern Nantahala Wilderness.</p> <p>*The USFS has reduced the acreage of this potential</p>	<p>The potential extensions to the Southern Nantahala Wilderness would add to the value and integrity of the existing Southern Nantahala Wilderness.</p> <p>"Sights and sounds" should not be used to disqualify an eligible area. Congress explicitly rejected the idea that an area's wilderness character should be judged by what happens <i>outside</i> its boundaries. The Eastern Wilderness Areas Act rejected this "purity theory".</p>

<p>solitude. There is also a private inholding east of Sharptop Ridge; approximately five miles of closed low maintenance level NFS road being maintained as linear wildlife openings; and approximately 293 acres of outstanding or reserved subsurface mineral rights in the area. These conditions adversely affects management for wilderness characteristics from certain locations within the area.</p> <p>However, two portions of the area adjacent to the existing wilderness (including parts of the IRAs) could be managed to preserve wilderness characteristics of apparent naturalness and opportunities for solitude or primitive and unconfined recreation. While these parts of the IRA would each be less than 5,000 acres, they could be considered as they are extensions to the existing Southern Nantahala wilderness.</p>	<p>addition too much, by overemphasizing the impact of low maintenance level roads, past timber harvests, and wildlife fields. The forest of the southern Appalachian Mountains has a remarkable ability to recover and restore with time. By dropping portions of this area from analysis, the USFS is making inappropriate management trade-offs.</p>	
<p>Conclusion</p>		
<p>The Chunky Gal Extension inventory area includes low maintenance level NFS roads, recent timber harvests, and maintained wildlife fields that detract from naturalness. The northern boundary's configuration and shape confine recreation users to a relatively narrow peninsula encircled by a state highway. Opportunities for solitude are also adversely affected in this northern area by sights and sounds of the adjacent highway and highly developed communities to the west. When adjusting the area to exclude the portions that impact wilderness</p>	<p>*It is inappropriate to include a "conclusion" section at this stage in the planning process.</p> <p>*It is also wrong to conclude that an area or a portion of an area in the Wilderness Inventory has no wilderness characteristics, as all areas in the inventory inherently do to some degree or they would not have been included to begin with. Decisions about whether or not to carry forward an area into analysis should not take place until subsequent steps.</p>	<p>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</p>

characteristics, two separate areas result:

1. In the southwest of the area, adjacent to the Southern Nantahala Wilderness, the portion of the area known as Sharptop Ridge that is currently managed as an Inventoried Roadless Area better reflects wilderness characteristics. This area is being identified in summary tables as the Sharptop Ridge area. While this area is less than 5,000 acres, it is of sufficient size as to make practicable its preservation and use in an unimpaired condition because it is adjacent to an existing wilderness area.

2. The portion of the area that is known as Chunky Gal Inventoried Roadless Area also reflects wilderness characteristics. While this area is less than 5,000 acres, it is of sufficient size as to make practicable its preservation and use in an unimpaired condition because it is adjacent to an existing wilderness area.

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 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.

Low maintenance level closed roads, past timber harvests, and wildlife fields should be documented in the evaluation, but they are not a valid reason to drop portions of the area from further analysis. Recovery and restoration from these negative effects could occur over fairly short time frames. Rejection of portions of the area from further analysis at this point implies management tradeoffs, which is inappropriate for the evaluation. “Sights and sounds” should not be used to disqualify an eligible area. Congress explicitly rejected the idea that an area’s wilderness character should be judged by what happens *outside* its boundaries. The term wilderness “character” was deliberately chosen (and substituted for the earlier version’s “environment”) because “‘environment’ might be taken to mean the surroundings of the wilderness rather than the wilderness entity.”^[1] Congress has repeatedly rejected agency attempts to disqualify areas based on sights and sounds,

		<p>designating areas over agency objections.</p> <p>[1] Solitude, “Sights and Sounds” and the Wilderness Act” (April 2003) (citing legislative history of S.3809, 86th Congress).</p>
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