

## **Craggy Mountains**

### **10,653 acres**

The Craggy Mountains extend from the high elevations of the Blue Ridge Parkway at 6,000 feet down to lower elevation rich coves at 3,000 feet. The area, also known as Big Ivy, which takes its name from the river with headwaters in the area, is extremely important for its biological diversity and scenic and recreational values. It includes the Craggy Mountain Wilderness Study Area, Big Butt Ridge and much of the land in between, including the Walker Cove Natural Area. Although an isolated section of national forest land, it is well connected to the rest of the Black Mountains through protected conservation lands, the Asheville Watershed and the Big Tom Wilson Preserve. A large designated Forest Service old growth patch stands within this area, and there are four verified sites containing 2,857 acres of old growth forest. Most of the old growth sites overlap with areas of significant biological habitat. The combination of extensive old-growth forests, high elevation peaks and the rich soils derived from magnesium-rich mafic rock make the Craggy Mountains an incomparable natural area.

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

Only 3,450 acres of the 10,653-acre area are included in alternative B and C, and even fewer – 2,578 acres – are included in Alternative D for analysis. The Wilderness Society and Friends of Big Ivy are advocating for an expanded area of 7,900 acres be analyzed, with the remaining acres being protected as backcountry. It is not enough to only analyze a fraction of this area for potential recommendation.

### **Highlights from this evaluation**

- The evaluation does not document in sufficient detail the old growth forest in this area, including forest in the northern portion which the Forest Service proposes to drop from analysis.
- The evaluation exaggerates sights and sounds of civilization outside the boundaries of the Craggy Mountains area. Not only is this an exaggeration, but according to the rules that the agency should follow, they should not evaluate activities and features outside of the boundary.
- We wish that the Forest Service would consider the boundaries proposed by Friends of Big Ivy, The Wilderness Society, and over 30 other groups that support an expanded wilderness boundary of 7,900 acres that includes the northern portion of the evaluated area.
- The evaluation completely understates the ecological value of this entire area.
- The evaluation is holding the Craggy Mountains up to such high standards that even existing wilderness areas such as Shining Rock and Middle Prong could not meet.
- There is such strong support for this area to be designated wilderness that it should be considered in every draft alternative and with a greatly expanded acreage.

### **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 Evaluation Response
<b>Apparent Naturalness</b>		
There are many miles of NFS roads and trails in the northern three-quarters of the area, as well as wildlife fields that detract from a natural appearance. Near	*The evaluation fails to properly document old growth forest in this area. Remind the Forest Service that there is old growth	In the expanded area TWS, Friends of Big Ivy, and other groups have proposed, no incompatible roads or wildlife openings are included. And in the northern section of Big Ivy, all of

<p>the Big Butt Trail on the eastern boundary, there is little evidence of human modification in the diverse high-elevation forests. The southern portion of the area in the Wilderness Study Area has little noticeable evidence of historic logging. There is an old growth hemlock forest in the Wilderness Study Area near Douglas Falls, but it is now mostly dead as a result of the nonnative invasive hemlock woolly adelgid.</p>	<p>forest in the expanded wilderness proposed by several groups. Remind the USFS that there is also old growth in the northern section of Big Ivy, including parts of Cedar Cliff Knob, Pigpen Knob, Sheepwallow Knob, High Knob, Big Butt, Little Butt, Sugarhouse Cove, and Pinnacle Mountain.</p>	<p>the Forest Service (closed) roads and wildlife openings are located in a narrow section along State Road 197. Most of the forest’s old-growth forests and much of its rare species habitat occurs in the expanded wilderness area, as the Forest Service’s own inventories indicate. Almost 100 acres of spruce-fir forest occur in the high-elevation corridor above Laurel Gap Trail and along Brush Spring Ridge. Old-growth forests are also located in the northern section of Big Ivy—including parts of Cedar Cliff Knob, Pigpen Knob, Sheepwallow Knob, High Knob, Big Butt, Little Butt, Sugarhouse Cove, and Pinnacle Mountain.</p>
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**Opportunities for Solitude or Primitive & Unconfined Recreation**

<p>Opportunities for solitude exist within the area along the Big Butt Trail and in the Wilderness Study Area. Sights and sounds of civilization are evident in the south from the Blue Ridge Parkways, and from adjacent private lands to the northwest. Encounters with vehicles, hunters, rock climbers, mountain bikers and horseback riders is likely along most trails and NFS roads in the northern three-quarters of the area (outside the Wilderness Study Area). There are also opportunities for primitive and unconfined recreation throughout the area, especially along the eastern boundary and in the Wilderness Study Area. Heavy mountain bike use in the central portion of the area is not considered primitive recreation.</p>	<p>*Contrary to the evaluation, sights and sounds from the Blue Ridge Parkway are not apparent.</p> <p>*Tell the Forest Service that encounters with other people do not detract from a wilderness experience.</p> <p>* Tell the Forest Service that you support the expanded wilderness boundaries proposed by The Wilderness Society and Friends of Big Ivy. These boundaries capture the areas with wilderness characteristics (south, east, and north) while excluding the central portion that is heavily used by mountain bikers but still has great opportunities for primitive</p>	<p>If you spend much time in the area, you realize that sights and sounds from the Blue Ridge Parkway or private lands are not apparent. There would be no encounters with vehicles or mountain bike riders within the boundaries proposed by TWS, Friends of Big Ivy and other groups. You may encounter hunters, rock climbers, and horseback riders. However, why would this detract from a wilderness experience? These are other users who also could easily be wilderness users. Some encounters with other users should be expected in wilderness. The evaluation statement seems to be based on a “purity theory” that the Eastern Wilderness Areas Act rejected.</p> <p>Although the central section in the boundaries proposed by TWS connecting the southern and northern sections is relatively narrow, the extremely steep topography of the area shields this section from sounds of the Blue Ridge Parkway and from roads and mountain bike trails below the</p>
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	<p>recreation.</p> <p>* The northern portion of this area has important wilderness characteristics and should not be disqualified from analysis. The area is important for the overall opportunities in the area for solitude, and primitive and unconfined recreation.</p> <p>* The Big Butt Trail is an ideal wilderness trail with unique opportunities for solitude and primitive recreation.</p> <p>* There might be limited sights and sounds of civilization in some parts of this area, but not to a degree that isn't found in existing designated wilderness areas (including Middle Prong and Shining Rock Wilderness Areas). This factor certainly should not disqualify the area from recommendation.</p> <p>*Remind the Forest Service of how economically and socially important this area is, as illustrated by the 200 people who attended the September 2016 Buncombe County Commissioners meeting in support of expanded wilderness protection for the area.</p>	<p>boundary. The narrowness is also deceptive because National Park wildlands below the Blue Ridge Parkway should be considered in conjunction with Forest Service lands. The northern portion of the area is an important part of the overall area that contributes to the solitude and primitive and unconfined recreation of the entire area.</p> <p>The Big Butt Trail is an ideal wilderness trail with unique opportunities for solitude and primitive recreation. As The Forest Service's own evaluation states, "Near the Big Butt Trail on the eastern boundary, there is little evidence of human modification in the diverse high-elevation forests." The Forest Service evaluation also confirms that "there are also opportunities for primitive and unconfined recreation throughout the area, especially along the eastern boundary." The central portion with heavy mountain bike use is not included in our expanded area, but the strenuous trails and rugged, remote area lends itself to primitive &amp; unconfined recreation such as hiking, hunting, horseback riding, and camping.</p> <p>Limited sights and sounds might be evident in certain portions of the area. However, these are no different in type or quantity from other designated wilderness areas, including Shining Rock and Middle Prong Wilderness Areas. That factor alone should not disqualify this area and the expansion we seek. In fact, the scenic value of this area is important both socially and economically, as members of the public have expressed to the agency in comments and at the Big Ivy public meeting.</p>
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Other Values - Unique or Outstanding Qualities		
<p>The Craggy Mountains area offers scenic beauty and rich hardwood forests. Overlooks of this area from the Blue Ridge Parkway at Pinnacle Gap, Craggy Pinnacle, and Craggy Gardens are some of the most visited in the area. The Big Ivy area is highly prized for its old-growth hardwood forests and plant diversity. Douglas Falls in the Wilderness Study Area is a popular destination point.</p>	<p>*The evaluation completely understands the ecological value of this <u>entire</u> area. Remind the Forest Service of:</p> <ul style="list-style-type: none"> <li>- 32 rare species of regional and global importance documented in the northern portion of the area (which they are proposing to drop from analysis)</li> <li>- confirmed cerulean warbler habitat</li> <li>- the Natural Heritage Areas in this area, each of which are high priority</li> <li>- Native brook trout habitat</li> </ul> <p>*The northern portion of this area is a significant portion of the Blue Ridge Parkway viewshed and should be protected</p> <p>*Wilderness is an appropriate protection for the Mountains to Sea Trail corridor</p>	<p>Other Values: Over 20 documented locations of 32 rare plant and animal species are located in the northern section of Big Ivy and along the high-elevation corridor that is currently excluded from wilderness recommendation. Regionally and globally rare plants recently identified in the northern section of Big Ivy include <i>Primula media</i>, <i>Rudbeckiabeadleyi</i>, <i>Thalictrummacrostylum</i>, <i>Aconitumreclinatum</i>, <i>Polygalasenega</i>, and <i>Cypripediumparviflorum</i> var <i>parviflorum</i>.</p> <p>Additional cerulean warbler habitat has recently been confirmed on Pigpen Knob and Sheepwallow Knob. The North Carolina Natural Heritage Areas Program recognizes the ecological significance of the Big Butt/Brush Fence Ridge high-elevation corridor and the northern section of Big Ivy. Over 1,200 acres of natural heritage areas are identified on High Knob, Pinnacle Mountain, and in Sugarhouse Cove, and an additional 252 acres are located on Cedar Cliff Knob. Each of these natural heritage areas is listed as a high priority area. The northern section of Big Ivy and the high-elevation corridor are a significant portion of the Blue Ridge Parkway viewshed, especially from the Craggy Gardens Visitor Center, one of the most popular visitor points along the Parkway. The Mountains to Sea Trail would also be better protected by an expanded Craggy wilderness boundary. Native brook trout abound in the headwaters of Corner Rock Creek, Straight Creek/North Fork, and Town Branch. Rich cove forests and exposed cliff faces are found on slopes and</p>

		ridges throughout the northern section of Big Ivy, including High Knob, Pigpen Knob, Sheepwallow Knob, and Cedar Cliff Knob.
<b>Size and Manageability</b>		
<p>The entire Craggy Mountains evaluation area is more than 10,000 acres. Most of the area outside the Wilderness Study Area are interspersed with open NFS roads, mountain bike trails, and maintained wildlife openings. The configuration of these features divides the area into many small tracts (the open NFS Road 74 (which is cherry stemmed out of the area) almost bisects the area from north to south).</p> <p>The southern portion has been managed to preserve wilderness characteristics since its designation as a Wilderness Study Area in 1984, and was recommended for wilderness designation in the 1987 Nantahala and Pisgah National Forest Land and Resource Management Plan. Additionally, a small area north of the Wilderness Study Area called Locust Ridge also retains a natural appearance, and opportunities for solitude and primitive recreation. That area lies between the Wilderness Study Area boundary at Bullhead Ridge and Staire Branch, excluding NFSR 5555 and linear wildlife fields at Laurel Gap. Together the Wilderness Study Area and Locust Ridge area are less than 5,000 acres, but could be managed to preserve wilderness characteristics</p>	<p>*The Wilderness Society, Friends of Big Ivy, and other groups are advocating for an expanded area of 7,900 acres be analyzed, with the remaining acres being protected as backcountry. It is not enough to only analyze a fraction of this area for potential recommendation.</p> <p>*The evaluation should note that this area is in the heart of 100,000 contiguous aprotected acres. Wilderness is the most appropriate form of management for this area.</p> <p>*If the Forest Service considers the boundaries proposed by other groups, the roads in the center of the area would no longer preclude the area from wilderness management.</p> <p>*It is really important that the Forest Service re-examine the northern portion of this area. It contributes to the overall solitude and primitive and unconfined recreation opportunities of the entire area.</p>	<p><b>Size and Manageability:</b> This expanded Craggy Mountain wilderness area is the heart of a 100,000 acre contiguous protected area surrounding it, which includes the BigTom Wilson Preserve, Blue Ridge Parkway, Mount Mitchell State Park, and the Asheville Watershed, along with adjacent Pisgah National Forest lands. In this context, management of this area (Current area and expansion to the north and east with FSR 74 cherry stemmed into the area for access) is much more appropriate as wilderness than other management. With the west-central portion removed from consideration and the north and east expansion, FSR 74 does not “bisect” the area and would not preclude management as Wilderness.</p> <p>Although the central section in boundaries proposed by TWS connecting the southern and northern sections is relatively narrow, the extremely steep topography of the area shields this section from sounds of the Blue Ridge Parkway and from roads and mountain bike trails below the boundary. The narrowness is also deceptive because National Park wildlands below the Blue Ridge Parkway should be considered in conjunction with Forest Service lands. The northern portion of the area is an important part of the overall area that contributes to the solitude and primitive and unconfined recreation of the entire area. This section is also best managed as wilderness. It is sensitive</p>

<p>because of topography, boundary configuration, and isolated nature.</p>		<p>view shed from Parkway land and should be managed to protect biodiversity values and view shed values.</p>
<p>Conclusion</p>		
<p>Northern and central portions of the Craggy Mountains area as inventoried in 2015, contain features that detract from wilderness characteristics of naturalness, solitude, and primitive recreation. Roads, wildlife fields, and mountain bike trails divide the area into small tracts of insufficient size to manage as wilderness. However, the Wilderness Study Area as designated by Congress does retain wilderness characteristics; as does the Locust Ridge area immediately north of the Wilderness Study Area. The evaluation boundary has been adjusted to best reflect the portion of the area with wilderness characteristics. While this adjusted area is less than 5,000 acres, it could be managed to preserve wilderness characteristics in an unimpaired condition.</p>	<p>*Strong and broad local support for hands-off management indicates that this area should be considered for wilderness recommendation. The local Big Ivy community also supports an expanded wilderness boundary. Big Ivy bear hunters like Hoyte Dillingham have voiced their support for the bear habitat and mast from old-growth oaks that wilderness provides, and local farmers like Paul Littman of Ivy Creek Family Farm support the clean water protections of an expanded Craggy wilderness.</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 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. Support: Strong and broad local support for hands-off management indicates that this area should be</p>

		<p>considered for wilderness recommendation. The local Big Ivy community also supports an expanded wilderness boundary. Big Ivy bear hunters like Hoyte Dillingham have voiced their support for the bear habitat and mast from old-growth oaks that wilderness provides, and local farmers like Paul Littman of Ivy Creek Family Farm support the clean water protections of an expanded Craggy wilderness.</p> <p>This expanded wilderness area is supported by Friends of Big Ivy's 2,000 members and 34 outdoor businesses and organizations, including International Mountain Biking Association, Pisgah Area SORBA, Ivy River Partners, Clean Water for North Carolina, Nantahala Hiking Club, Southeastern Climbers Coalition, The Access Fund, Mountain True, WNC Trail Runners, The Wilderness Society, Sierra Club, Wild South, Backcountry Horsemen of Western North Carolina, American Whitewater, Southern Appalachian Wilderness Stewards, and Outdoor Alliance.</p>
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