

Daniel Ridge

11,695 acres

The Daniel Ridge area is located in Transylvania County, and lies between Davidson River Road (NFSR475) and the Blue Ridge Parkway. Parts of this area have steep and rugged terrain. A prominent landmark within the area is Pilot Mountain. The area also has several other peaks and ridges over 4,000 feet and contains the headwaters of the North Fork French Broad and Davidson Rivers. A broad range of ecozones are represented in this area, including acidic cove, rich cove, dry-mesic oak, dry-oak, northern hardwoods, northern red oak, and some spruce-fir at the highest elevations.

What's at stake for this area?

The evaluation of Daniel Ridge illustrates a lot of the systemic and fundamental issues with the evaluation as a whole. From what we know of draft Alternative B, the Forest Service's intent is for this area to go to active management. It's important for the wilderness evaluation to properly document the wilderness characteristics of Daniel Ridge so that we can work towards protecting it with backcountry or special biological area management.

Highlights from this evaluation

- The Eastern Wilderness Areas Act of 1975 was passed to stop the Forest Service from using an overly strict definition of wilderness that it invented and that undermines the intent of the Wilderness Act. The current evaluations ignore this Act (details to follow).
- This evaluation exaggerates the impact of historical logging in the area, failing to recognize that much of the area has recovered, and the remainder will recover in time. Despite past logging, this area supports a number of rare and threatened species, and has embedded within its boundaries three State Natural Heritage Areas.
- The evaluation dwells on the current uses of this area by many different user groups (and presence of structures), citing this as a detraction from its wilderness characteristics. What the Forest Service is actually doing is making management trade-offs at a time when it is supposed to be objectively documenting the wilderness characteristics of an area.
- This evaluation exaggerates views of the Blue Ridge Parkway and sights and sounds from beyond the boundary of this area, claiming that they impact opportunities for solitude. According to the evaluation, opportunities for solitude exist only in the most remote coves of this area.
- The evaluation dwells again on existing uses of the area, again making several management trade-offs. While mountain biking "is not considered a primitive form of recreation", public lands that preserve solitude and opportunities for primitive recreation is clearly important to many mountain bike users.
- The evaluation completely ignores the significant outstanding ecological features of this area, instead focusing on "scenic waterfalls" that the Forest Service claims "are not particularly unique." There are, in fact, THREE Significant Natural Heritage Areas embedded within this area.
- The evaluation fails to mention the presence of over 1,900 acres of old growth forest.
- Overall, the evaluation exaggerates the presence and impact of roads, structures, and sights and sounds of civilization. However, none of these factors are more pervasive than they are in designated wilderness areas (including nearby Middle Prong and Shining Rock Wilderness Areas).
- Concluding that the Daniel Ridge area "does not have wilderness characteristics" puts it at risk of not being protected by means other than wilderness recommendation. This area should be managed as backcountry.

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
Apparent Naturalness		
<p>Although many locations within the area have a natural appearance, these forests have been heavily logged in the past and contain recent wildlife habitat improvement and vegetation management activities. Maintained wildlife fields and low maintenance-level roads are commonly seen in the east, west and south; many of them are well established. There are heavily used mountain bike trails throughout the area that detract from the area's natural appearance. Constructed features include remnants of the old trout rearing station along Davidson River, a shelter on Art Loeb Trail, trail bridges, numerous road culverts, and bear hanging devices (designed to protect food and gear from bears and reduce bear encounters). From many locations within the area, the Blue Ridge Parkway is visible on the high ridge along the entire northern boundary; including cut rock faces and permanent vista openings.</p>	<p>*Remind the Forest Service that these forests recover from logging. The evaluation fixates too much on this area's history of logging. Most areas in the east have been logged, and for that reason, Congress passed the 1975 Eastern Wilderness Areas Act. Standards established in the Act allow for ongoing recovery of areas from past human impacts and reject the Forest Service's overly strict standards that undermine the Wilderness Act.</p> <p>*Remind the Forest Service that despite this area's history of logging, it reflects normal ecological conditions and supports a number of rare species.</p> <p>*The evaluation fails to mention the presence of at least 1,900 acres of old growth forest in this area.</p> <p>*The evaluation does not properly document the natural conditions</p>	<p>The criteria in the directives is "apparent naturalness". Areas in the east would have been expected to have "been heavily logged in the past". Vegetation management 21-40 years old will already be regaining apparent naturalness and as the years pass will increasingly appear natural. Standards established in the Eastern Wilderness Areas Act allow for ongoing recovery of areas from past human impacts and reject the purity standard. Acreage in vegetation management 0-20 years old and maintained wildlife fields are relatively minor in relationship to the entire area and do not detract from the area as a whole. Despite past management, the area reflects ecological conditions that would normally be associated with the area and supports rare species native to the area. In fact the area is considered a stronghold for the rare Pinkshell azalea (<i>Rhododendron vaseyi</i>). The area contains at least 1,900 acres of existing old growth.</p> <p>Heavy use of mountain bike trails is a management tradeoff not an impact to natural conditions. Many mountain bike users use these trails because they immerse users in "natural conditions" and mountain bike users enjoy this experience as well as hikers. It is an issue for analysis to decide whether areas should be devoted to mountain bike use vs hiker use vs wilderness recommendation. It is inappropriate to bring in current use as a factor under the natural conditions criteria. Nowhere in the directives does it mention current use as a measure of natural conditions.</p> <p>Constructed features that are actually within the area listed should be considerations, but are not major considerations to natural conditions. We question whether the ruins of</p>

	<p>of this area, instead focusing too heavily on current uses and existing constructed features. Precluding an area from analysis because it is heavily used by mountain bikers goes against the directives. The role of the evaluation is to properly document the wilderness characteristics of this area. Mountain biking is no doubt popular in this area because of its apparent naturalness.</p> <p>*The evaluation exaggerates views of the Blue Ridge Parkway. Speaking from your experience if possible, let the Forest Service know that the Parkway is only visible from the highest elevations on exposed terrain (usually, forest blocks views).</p> <p>*Remind the Forest Service that anything outside of the boundary is not relevant to the evaluation of wilderness characteristics.</p>	<p>the old trout rearing station on the Davidson River are actually within the area (or could easily be excluded. The shelter at Deep Gap on the Art Loeb Trail is a factor that should be noted. However, it is not a disqualifying feature. Wilderness has been designated with similar structures, and some existing wilderness has more significant structures still remaining within its boundaries. Similarly, trail bridges, road culverts, and bear hanging devices are fairly ephemeral structures that could be removed, are not disqualifying features, and only affect the natural appearance of the area to a very limited extent. Many of these factors highlighted in the evaluation appear to be management tradeoffs rather than impacts to natural conditions. As such they are more appropriate as considerations during analysis rather than evaluation.</p> <p>We dispute the statement that “From many locations within the area, the Blue Ridge Parkway is visible on the high ridge along the entire northern boundary...”. There are locations where the Blue Ridge Parkway is visible, but almost exclusively in the higher elevations in exposed terrain where lack of vegetation allows long range views. These views of the Parkway are not disqualifying features. The directives state: “The extent to which improvements <i>included in the area</i> (emphasis added) (sec. 71.22 of this Handbook) represent a departure from apparent naturalness. The Parkway is external to the area to be evaluated and should not be used as an impact to natural conditions of the area itself in evaluating natural conditions. Certainly many designated wilderness areas have similar external views.</p>
<p>Opportunities for Solitude or Primitive & Unconfined Recreation</p>		
<p>While opportunities for solitude exist in remote coves and steep slopes in the area, there are many miles of heavily used trails where encounters with</p>	<p>*The evaluation totally exaggerates impacts to solitude in the area. Remind the Forest Service that you don’t need to be totally</p>	<p>The directives state for solitude: “<i>Consider impacts that are pervasive and influence a visitor’s opportunity for solitude within the evaluated area. Factors to consider may include topography, presence of screening, distance from impacts, degree of permanent</i></p>

<p>other forest visitors is a high probability throughout the year. Mountain bikers, hikers, rock climbers, hunters and fishermen access the area from multiple trailhead parking lots around the perimeter; which are often filled to capacity. Sights and sounds of civilization are evident from locations near NC215, Davidson River Road, Headwaters Road, Courthouse Falls, Cove Creek Group Campground, and the Blue Ridge Parkway. There are many opportunities for primitive and unconfined recreation in the area. The Art Loeb National Recreation Trail passes through the area. This trail is popular with school and camp groups for multi-day backpacking trips, often these groups contain 20 or more participants which would affect opportunities for solitude. The many rock outcrops and cliffs attract climbers, while area streams and managed forests provide fishing and hunting opportunities. The area also contains several miles of mountain bike trails which is not considered a primitive form of recreation.</p>	<p>isolated in order to enjoy solitude. Encountering other people in an area does not mean that the area does not have opportunities for solitude.</p> <p>*Again, remind the Forest Service that they are only supposed to evaluate within the boundary of this area. The evaluation fixates on external features.</p> <p>*Tell the Forest Service your experience with “sights and sounds” in this area – are they pervasive enough to impact your experience?</p> <p>*Remind the Forest Service that they are not supposed to make management trade-offs at this stage of the process. They are simply supposed to objectively document the wilderness characteristics of this area.</p> <p>*Tell the Forest Service that this area needs to be protected as backcountry, because primitive experiences are important to all people, regardless of how they use the forest (for example, many people who mountain</p>	<p><u><i>intrusions, and pervasive sights and sounds from outside the area.</i></u>” The fact that a user may encounter other users on some trails is not a barrier to solitude. Users seeking solitude expect to meet other users and total isolation is not a condition for solitude to occur. Impacts to solitude by encounters with other users are by no stretch “pervasive” in Daniel Ridge and opportunities for solitude exist even on the most used trails during the busiest times of the year.</p> <p>While sights and sounds of civilization may be apparent very near NC215, Davidson River Road, Headwaters Road, Courthouse Falls, Cove Creek Group Campground, and the Blue Ridge Parkway, these features are all external to the area being evaluated. Sights and sounds from these features are only apparent on the very periphery of the area close to these features. Otherwise vegetation screening and topography largely screens the area from sights and sounds originating from these features and in no case are these sights and sounds “pervasive” in the area as a whole. Use of these features to deny that the area as a whole lacks solitude seems to harken back to purity standards rejected by standards set in the Eastern Wilderness Areas Act.</p> <p>We agree with the documentation that there are numerous opportunities for primitive and unconfined recreation. However, the factors enumerated documenting other users that affect solitude or that could conflict with primitive and unconfined recreation are actually management tradeoffs that should be brought in during analysis and comparison of alternatives. While mountain bike use is incompatible with wilderness designation, it is not incompatible with other types of designations including backcountry. In fact many mountain bike users value solitude and opportunities for primitive recreation: see IMBA FAQs: https://www.imba.com/resources/land-protection/frequently-asked-questions-</p>
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	<p>bike enjoy solitude and primitive experiences). The Forest Service needs to safeguard these characteristics.</p>	<p>wilderness-and-imba Allocation of public lands that preserve solitude and opportunities for primitive recreation is clearly important to many mountain bike users. It is essential to properly document solitude and opportunity for primitive recreation characteristics for use during the analysis process and comparison of alternatives so that this information is not only available for wilderness recommendations but also for other allocations such as backcountry that would safeguard these characteristics.</p>
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Other Values - Unique or Outstanding Qualities

<p>There are many scenic waterfalls in the area including Daniel Ridge/Tom’s Spring Falls and Courthouse Falls, however, they are common within the context of the Southern Appalachian Mountains, and not particularly unique. Other water resources include the headwaters of the North Fork French Broad and Davidson Rivers, the latter of which is an eligible Wild and Scenic River.</p>	<p>*Here, the evaluation completely ignores the significant outstanding qualities of the area, instead focusing on “scenic waterfalls ... [that] are not particularly unique.” However, the Daniel Ridge Area has exceptional and important ecological features including rare plant and animal communities, and rare ecosystems.</p> <p>*Tell the Forest Service that they MUST document the old growth in this area (over 1,900 acres). Remind them that the features of the three Significant Natural Heritage Areas embedded within this area deserve to be documented.</p> <p>*Many people come to the Daniel Ridge area when the rare and endemic Pinkshell</p>	<p>The focus in the evaluation on scenic waterfalls is not that useful in documenting <u>“the degree to which the area may contain ecological, geological, or other features of scientific, educational, scenic, or historical value.”</u> The scenic waterfalls are not the most significant outstanding qualities of the area. Significant old growth (at least 1,900 acres) is found in the area. Significant old growth tracts are an uncommon feature in the Southern Appalachians and deserving of recognition and protection. Part of the area is also a large patch old growth area under the existing Plan. The area includes three Significant Natural Heritage Areas that have unique or outstanding biological values: Pisgah Ridge/Pilot Mountain, Case Camp/Seniard Mountain, and Devils’s Courthouse. Pisgah Ridge/Pilot Mountain and Devil’s Courthouse are rated as “exceptional” (the highest rating possible) in both R-Rating (Representational Rating) and C_Rating (Element Collective Rating). The “Exceptional” R-Rating is defined as <u>“Site containing one of the two best examples of G1 and G2 elements.”</u> The C_Ranking <u>“evaluates the conservation value of each SNHA based on the number of tracked elements present, and the rarity of those elements...”</u> These science based delineations by the NC Natural Heritage Program certainly should fit within the evaluation criteria: <u>“Rare plant or animal communities or rare ecosystems. Rare can be determined locally, regionally, nationally, or within the system of</u></p>
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	<p>azalea (<i>Rhododendron vaseyi</i>) are in bloom because area trails go through significant populations of this species.</p> <p>* We agree that “the headwaters of the North Fork French Broad and Davidson Rivers, the latter of which is an eligible Wild and Scenic River” is a significant characteristic to note under the category of <u>“high quality water resources or important watershed features”</u>.</p>	<p><u>protected designations.”</u> It is of note that prior to the R_ and C_ rankings the Natural Heritage program rated the 3 SNHAs as of national or regional significance.</p> <p>These rare communities and SNHAs have been identified before in previous evaluation comments. The wilderness evaluation is failing to adequately document wilderness characteristics according to Planning Rule directives when it fails to recognize and document qualifying characteristics when they are identified by the public.</p> <p>Many people come to the Daniel Ridge area when the rare and endemic Pinkshell azalea (<i>Rhododendron vaseyi</i>) are in bloom because area trails go through significant populations of this species. In fact, Carolina Mountain Club has had organized hikes to feature these blooming events.</p> <p>We agree that “the headwaters of the North Fork French Broad and Davidson Rivers, the latter of which is an eligible Wild and Scenic River” is a significant characteristic to note under the category of <u>“high quality water resources or important watershed features”</u>.</p>
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Size & Manageability

<p>At 11,695 acres, the Daniel Ridge area appears to be large enough to manage as wilderness; however, area boundaries are fairly irregular and cherry-stem around multiple open roads and developed recreation facilities in the area. The Blue Ridge Parkway parallels the entire northern boundary and lies along the highest ridge above the area, where sights and sounds of the roadway are evident from many locations. With the exception of the border along the Blue Ridge Parkway, the area is completely surrounded by</p>	<p>*The evaluation exaggerates the cherry stemmed roads in this area. Their presence is no more common than other designated wilderness areas or backcountry areas.</p> <p>*The evaluation exaggerates the irregular boundaries of this area.</p> <p>*The evaluation ignores the fact that a large portion of the center of this area is unroaded, which would make active management likely</p>	<p>There are some cherry stems of open roads in the area but no more than other designated wilderness or areas managed for backcountry. The boundaries are no more irregular than other wilderness or backcountry areas. A large portion of the central core of the area as well as the upper portion along the BRP is unroaded and would pose management challenges (likely insurmountable) for active management.</p> <p>The fact that “The Blue Ridge Parkway parallels the entire northern boundary and lies along the highest ridge above the area” should be a non-factor or at most a minor factor in the evaluation of the area. This statement is equally true for both Shining Rock Wilderness and Middle Prong Wilderness just across the Blue Ridge Parkway from the Daniel Ridge area. The sights and sounds of the Blue Ridge Parkway are noticeable in places within</p>
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<p>National Forest System lands.</p>	<p>insurmountable.</p> <p>*The evaluation cites the fact that the Blue Ridge Parkway parallels the northern boundary as a detraction from its wilderness characteristics. However, what about the existing Shining Rock Wilderness and Middle Prong Wilderness?</p> <p>*The Forest Service is again taking too strict of an approach to evaluating wilderness characteristics, which Congress addressed with the 1975 Eastern Wilderness Areas Act. The agency MUST use realistic standards.</p>	<p>Shining Rock and Middle Prong as they are in various locations within Daniel Ridge. However, the sights and sounds are not “pervasive” within Shining Rock and Middle Prong and they are not “pervasive” within Daniel Ridge. This line of argument that sights and sounds are disqualifying appears to be a throwback to the “purity theory” that the Forest Service developed for areas in the eastern US after the Wilderness Act was initially passed. This purity theory was roundly rejected by Congress through standards established by the Eastern Wilderness Areas Act in 1975. It is clear that realistic standards should apply instead. Shining Rock Wilderness was established by the original Wilderness Act of 1964 following the intent of the original drafters of the legislation that realistic standards were to be used; The Eastern Wilderness Areas Act rejected the purity theory in 1975 opening the way for additional designation under realistic standards; Middle Prong was established in 1984 using realistic standards rather than the purity standards. It is unreasonable to reject areas, particularly during the evaluation process under what are clearly a throwback to purity standards that congress has rejected not only in the original wilderness Act and the Eastern Wilderness Areas Act but in essentially every wilderness bill involving eastern areas.</p>
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<p>Conclusion</p>		
<p>Overall, the Daniel Ridge area does not have wilderness characteristics. Heavy recreation use, abundant infrastructure, and recent vegetation management all negatively impact naturalness and opportunities for solitude in the area. The area is of sufficient size but has boundaries that would be difficult to manage to preserve wilderness characteristics.</p>	<p>* The Daniel Ridge area certainly has wilderness characteristics. In our experience in this area, the Blue Ridge Parkway, adjacent roads and infrastructure, recreation use, and past management has a negligible effect on wilderness characteristics.</p> <p>*By saying that the</p>	<p>The Daniel Ridge area certainly has wilderness characteristics. In our experience in this area, the Blue Ridge Parkway, adjacent roads and infrastructure, recreation use, and past management has a negligible effect on wilderness characteristics.</p> <p>Conclusions in the evaluation 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</p>

<p>The Daniel Ridge area has outstanding scenic attributes and water resources, but these are not unique in the Southern Appalachian Mountains.</p>	<p>Daniel Ridge Area “does not have wilderness characteristics” puts it at risk of not being protected by means other than wilderness. This area should be managed as backcountry.</p>	<p>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.</p>
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