

Mackey Mountain
14,985 acres

The Mackey Mountain area is on the Grandfather Ranger District of the Pisgah National Forest in McDowell County, NC. Much of the area has steep and rugged terrain, with dense forests and boulder-strewn streams. Mackey Mountain and the valley of Mackey Creek contain the largest unbroken tract of old-growth forest on the Pisgah National Forest with 5,476 acres of existing old growth.

What’s at stake for this area?

Only 7,355 acres (out of 14,985 acres) of the Mackey Mountain area are included for analysis in one of the four draft alternatives: Alternative C. The Forest Service cut the acreage of this area in half, claiming that sights and sounds of civilization impact the wilderness characteristics of the area, so that only the core inventoried roadless area is appropriate for analysis. We disagree, and it is important to address this concern in your comments.

Highlights from this evaluation

- The evaluation mentions that much of this area was not logged in the 20th century, but also mentions the evidence of past logging in other places. We hope that they will consider these artifacts as historical points of interest rather than factors that negatively impact apparent naturalness.
- The evaluation exaggerates “sights and sounds of civilization,” claiming that the Blue Ridge Parkway, US Highways, residences, farms, quarry, I-40, and the towns of Old Fort, West Marion, and Marion are evident from numerous locations, especially at the area’s boundary. Staff of The Wilderness Society have spent a lot of time in the Mackey Mountain area and disagree with this assessment.
- The evaluation understates the ecological value of this area and its extensive old growth forest.
- It is excessive to reduce the area in half and only consider the core inventoried roadless area. There are better ways to adjust the boundaries of the Mackey Mountain area to accommodate other uses.

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	TWS Description	TWS Evaluation Response
Apparent Naturalness		
The majority of the area has been managed for backcountry recreation for many years. There are no highly developed hiking trails, timber management areas, or maintained wildlife fields in the area. There is one low maintenance level NFS road used to access a municipal water intake on Mackey Creek, and the	*Tell the Forest Service how important it is to preserve the old growth forest. Mackey Mountain and the valley of Mackey Creek contain the largest unbroken tract of old-growth forest on the Pisgah National Forest with 5,476 acres of existing old growth.	The forests in the area, both the remaining old growth as well as forest that has grown back after logging is natural appearing. We agree with the evaluation that “parts of the area were untouched by early 20th century logging, where old growth characteristics have been preserved across

<p>associated intake structure. Much of this area was rail and flume logged in the past and evidence of past management in the area includes old rail routes, old logging cables left in the woods, and an old cart. However, parts of the area were untouched by early 20th century logging, where old growth characteristics have been preserved across thousands of acres; representing one of the largest contiguous blocks of natural appearing forest on the Pisgah NF.</p>	<p>*Remind the Forest Service that they should consider the artifacts of early 20th century logging as historical points of interest rather than negative factors against apparent naturalness.</p> <p>*Tell the Forest Service that you support the boundaries that The Wilderness Society has suggested, which exclude the municipal water supply and road access.</p>	<p>thousands of acres; representing one of the largest contiguous blocks of natural appearing forest on the Pisgah NF”.</p> <p>While portions of the area were logged early in the 20th century, this is not a major consideration under standards set in the Eastern Wilderness Areas Act. Also most of the artifacts left from early 20th century logging are over a century old now and should be considered historical points of interest rather than negative factors for apparent naturalness.</p> <p>TWS has suggested boundary adjustments that exclude the municipal water supply and the road accessing the water supply.</p>
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Opportunities for Solitude or Primitive & Unconfined Recreation

<p>Although area boundaries have adjacent private lands and roads where sights or sounds of civilization are evident, the area is predominately a remote backcountry with many opportunities for solitude; especially in the core area centered on the IRA. To the northwest is the Blue Ride Parkway, and to the east and south are US highways and adjacent residences, farms, and a quarry. In the distance is I-40 and the towns of Old Fort, west Marion, and Marion; and vehicles use Lower Mackey Creek Road administratively to access the Marion water intake. All of these sights and sounds of civilization are evident from various locations and negatively affect solitude, but they are primarily experienced closer to area boundaries. For the</p>	<p>* We disagree that opportunities for solitude are limited to the core area of the inventoried roadless area.</p> <p>*Use your experience in this area to tell the Forest Service about the opportunities for solitude in this area throughout the entire Mackey Mountain area.</p> <p>*The evaluation claims that sounds from outside of the area detract from solitude.</p> <p>*The Evaluation claims that sights of civilization detract from solitude. But at the vistas, we believe that people stop at these for the perspective they give of a predominantly natural landscape.</p> <p>*Remind the Forest Service that</p>	<p>We disagree that solitude is limited to the core area centered on the IRA. The Blue Ridge Parkway, US highways, adjacent residents, farms, quarry, I-40, and the towns of Old Fort, West Marion, and Marion are all external to the area and in some cases at a fairly great distance from the area. We have been throughout the Mackey Mountain area. The area is dominated by natural sounds with a near absence of outside sounds. Vegetation screening also makes the factors listed totally moot for outside sights. There are very few vistas giving views. People often stop at these for the perspective they give of a predominantly natural landscape. Sights and sounds from any of the listed factors have never disturbed our solitude. Some of these factors might be apparent on the very</p>
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<p>most part, area trails are not heavily used and encounters with other visitors is typically low; but some special use permit holders take multiple groups of 10 or more into the area at certain times of year.</p> <p>Most of the area is undeveloped and offers many opportunities for primitive and unconfined recreation, such as hiking, backpacking, hunting, fishing, and nature study. There is some mountain bike use in the area, which is not considered a primitive type of recreation, but this use is not prevalent across the area. Some inholdings, rights-of-way, and narrow arms of federal land along the eastern and southern boundaries tend to confine recreation use in these locations; as users would not have the ability to move through these areas without the possibility of encountering infrastructure or motorized vehicles.</p>	<p>areas should be evaluated as a whole instead of in a piecemeal fashion.</p>	<p>edges of the area, but areas should be evaluated as a whole not in a piecemeal fashion. The directives are clear that areas do not have to have outstanding opportunities for solitude on every acre.</p> <p>Also solitude should be considered under the guidance given in the directives:</p> <p><i>a. 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 intrusions, and pervasive sights and sounds from outside the area.</i></p> <p>TWS has suggested boundary adjustments that exclude the inholdings, right of ways, and access to municipal water.</p> <p>While "narrow arms of federal land" may not have the greatest opportunity for recreation within the area, the directives state for both primitive recreation as well as solitude "nor does it need to have outstanding opportunities on every acre."</p>
<p>Other Values - Unique or Outstanding Qualities</p>		
<p>Portions of the Mackey Mountain area were included in one of the first National Forest acquisitions in the east under the Weeks Act. Some locations in the area have forests with old growth characteristics.</p>	<p>*This area represents significant ecological value with extensive remnant old growth (5,476 acres). Most of the forest that was logged in the early 20th century is recovering mature forest with good ecological integrity.</p> <p>*Tell the Forest Service that they have here an opportunity to increase the ecological representation of ecological</p>	<p>As stated under the natural conditions portion of the evaluation: "...parts of the area were untouched by early 20th century logging, where old growth characteristics have been preserved across thousands of acres; representing one of the largest contiguous blocks of natural appearing forest on the Pisgah NF." Nowhere else on the Pisgah is there an equal amount of old growth forest of various ecozones in</p>

	<p>types in the Wilderness Preservation system, including Appalachian Cove Hardwood, Appalachian Hemlock-Hardwood; Appalachian Oak, Appalachian Oak –xeric; Appalachian Montane Oak, and Small Stream and Riparian Forest.</p> <p>*Point out that there are stands of Carolina hemlock in the Mackey Mountain Significant Natural Heritage Area.</p>	<p>excellent condition. This large amount of old growth forest also creates opportunity to increase the ecological representation of ecological types that are currently under-represented in the Wilderness Preservation system on the Forest as well as system wide. Ecological types currently underrepresented that Mackey Mountain would help increase include Appalachian Cove Hardwood, Appalachian Hemlock-Hardwood; Appalachian Oak, Appalachian Oak –xeric; Appalachian Montane Oak, and Small Stream and Riparian Forest. Stands of Carolina hemlock are found within the Mackey Mountain Significant Natural Heritage Area. There are 1,944 acres of State Natural Heritage Areas within the Mackey Mountain Area: Mackey Mountain Beartree Ridge</p>
<p>Size & Manageability</p>		
<p>At 14,985 acres, the area is of sufficient size to manage its preservation and use in an unimpaired condition in most locations. However, area boundaries have several narrow protrusions and non-federal lands extending into the area. There are two non-federal inholdings with rights of way, 182 acres of outstanding subsurface mineral rights, and a municipal water intake on Mackey Creek. However the core area is currently managed backcountry recreation, and could be managed to preserve wilderness characteristics with boundary adjustments.</p>	<p>*There are better ways to alter the boundaries of the Mackey Mountain area that do not significantly reduce the acreage of the area. Tell the Forest Service that you support the boundaries that The Wilderness Society has suggested, which exclude the inholdings, right of ways, and the municipal water intake, and the road to the water intake.</p>	<p>TWS has recommended boundaries that exclude the inholdings, right of ways, and the municipal water intake, and the road to the water intake.</p>
<p>Conclusion</p>		

The Mackey Mountain area overall is predominately natural appearing, and has opportunities for solitude, and for primitive and unconfined recreation. This is primarily true for the core Inventoried Roadless Area. Portions of the area outside the IRA have convoluted boundaries, private inholdings, easements, views of adjacent communities and highways, and a municipal water intake with an administrative access road, all of which negatively impact wilderness characteristics and manageability. Even within parts of the IRA, solitude is affected by views of Marion, West Marion, Old Fort, and the Interstate 40 corridor. However, these are only visible from high ridges and southern slopes, so impacts are not pervasive across the entire IRA. The area has been adjusted to better reflect the portions of the area that evaluated as having wilderness characteristics.

*Tell the Forest Service you disagree that the wilderness characteristics of Mackey Mountain are confined to the core inventoried roadless area.

We agree that the Mackey Mountain area possesses wilderness characteristics. We disagree that this is primarily confined to the inventoried roadless area. The conclusion in the evaluation that portions of areas either have wilderness characteristics or not and the use of the conclusions 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 to decide 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.
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