

Southern Nantahala Extension Area

4,298 acres

The Southern Nantahala Extension area is a potential extension to the existing Southern Nantahala Wilderness in Macon County and Northern Georgia. The area is adjacent to the popular Standing Indian Campground, where several “blue blaze” trails lead up to the Appalachian Trail. Congress arbitrarily designated parts of this Wilderness Area’s boundary along the 4,400’ contour line, but parts of this potential extension area would bring the boundary down to its logical border along the channel of the Nantahala River.

What’s at stake for this area?

The Forest Service is proposing to only analyze 1,207 acres in Alternative B and C. The area that will be analyzed excludes the Little Indian Addition and all potential additions between Chunky Gal and Little Indian (the northwest portion of the area that contains Park Creek and Park Ridge Trails, among others).

Highlights from this evaluation

- The evaluation fixates on evidence of past logging, even though the 1975 Eastern Wilderness Areas Act mandates that the Forest Service take a reasonable approach when considering the wilderness characteristics of an area.
- The evaluation oversimplifies the concept of “wilderness characteristics,” making it a black-and-white-issue.
- The evaluation claims that the trails near Standing Indian Campground are heavily used and therefore diminish opportunities for solitude.
- Since the area would be an extension to an existing wilderness area, its narrowness should not matter.
- It is wrong to conclude that an area in the Inventory has no wilderness characteristics, as all areas in the inventory inherently do to some degree.

Evaluation of Wilderness Characteristics and Corresponding Talking Points

Use any first-hand experience that you have to talk about how you recreate in the area (for example, the fishing opportunities that this area provides warrant protecting more of the watershed as wilderness). Emphasize the opportunities for solitude and recreation that they provide. Remember to be as specific and informative as possible.

USFS Evaluation	Talking Points	TWS Response to Evaluation
Apparent Naturalness		
The Southern Nantahala Extension area has been logged in the recent past in the Park Creek area and there are remnants of old logging roads and dispersed campsites throughout the area. Several hiking and horse trails run through the area. There are approximately 20 acres of	*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	It’s unclear how these historical factors play into evaluation of apparent naturalness. Recent logging may affect apparent naturalness to some extent, but these areas will quickly regain their apparent naturalness if they do not already appear natural. Other more distant past logging evidence would be largely irrelevant to the average user who would perceive the area as having

wildlife fields that are maintained by regular mowing.	considering the wilderness characteristics of an area.	a high degree of apparent naturalness. These historical features used as bars for wilderness consideration were rejected by the Eastern Wilderness Act's refutation of the "purity theory". Regarding evidence of past logging in the area, anything over 50 years old is considered historic according to the Eastern Wilderness Areas Act.
Opportunities for Solitude and Recreation		
Contiguous to the Southern Nantahala Wilderness, this area provides opportunities for solitude and primitive recreation. The areas currently managed as an Inventoried Roadless Area (1,783 acres) provide the best opportunity for solitude away from sights and sounds of open roads. Trails in the area adjacent to the Standing Indian Campground are extensively used, thereby detracting from the opportunity for solitude in that area.	<p>*The Forest Service is oversimplifying the concept of "Wilderness characteristics", making them a black-and-white issue. The Forest Service was tasked with identifying the degree to which an area possesses wilderness characteristics. They should not be making judgements on an area based on what happens outside its boundaries.</p> <p>*The "sights and sounds" in this case are not pervasive enough to warrant disqualifying the area from analysis. Tell the Forest Service which trails you have hiked, and how they offer remarkable opportunities for both recreation and solitude.</p>	<p>The role of the evaluation is to assess the degree that areas possess wilderness characteristics not to identify the "the best opportunity for solitude away from sights and sounds". Congress explicitly rejected in the Eastern Wilderness Areas Act the idea that an area's wilderness character should be judged by what happens <i>outside</i> its boundaries. "Sights and sounds" should not be used to disqualify an eligible area unless their effect is pervasive within the area, and that is not the case here.</p> <p>It is also not valid to eliminate portions of areas because trails may be "extensively used". This is undefined and vague. We have used these trails and have discussed this with others who frequent these trails. Often few people are seen on these trails. Opportunities for solitude are readily available on the trails out of Standing Indian Campground.</p>
Other Values		
This area contains southern Appalachian bogs and swamp-bog complexes as well as some forests with old growth character. Approximately 800 acres of The Nantahala River, an eligible Wild and Scenic River, are within the northern section of the area.	*Some of the swamp-bog complexes along NFSR67 could be excluded from the wilderness proposal and managed as special biological areas.	These swamp-bog complexes are important Natural Heritage Areas. Some of the swamp-bog complexes along NFSR67 could be excluded from the wilderness proposal and managed as special biological areas.

Size & Manageability		
<p>The area would be an extension of the Southern Nantahala Wilderness with the other boundary defined by NFSR 67 and NFSR 83. The area is less than 100 feet across at its narrowest point where NFSR67 comes in close proximity to the Southern Nantahala Wilderness.</p>	<p>*Since the area would be a wilderness extension, the narrowness of the extension is not relevant.</p> <p>*The proposed extensions are more logical than the existing boundaries of the Southern Nantahala Wilderness. Congress arbitrarily set its north and east boundaries at the 4,400-foot contour rather than to the logical physical boundary of the Nantahala River. This boundary was contrary to the desires of the local campaign to establish this area as wilderness.</p>	<p>Since the area would be a wilderness extension, the narrowness of the extension is not relevant to manageability.</p> <p>The proposed extensions would make more logical and manageable boundaries than the existing boundaries. An example of this is in the Little Indian portion of the area, essentially the basin of Little Indian Creek that feeds into the Nantahala River to the north-northeast. Congress arbitrarily set the north and east boundaries of the Southern Nantahala Wilderness to follow the 4,400-foot contour line rather than to the logical physical boundary of the Nantahala River. The proposed boundaries correct these issues.</p>
<p>Conclusion Recent vegetation management and existing wildlife fields detract from the naturalness in parts of the Southern Nantahala Extension Area. Opportunities for solitude or primitive and unconfined recreation are impacted in the northern portion of the area by the adjacent developed campground, dispersed campsites and the high recreation use. The best opportunity for wilderness characteristics are in the eastern sections that are less accessible and are within designated Inventoried Roadless Areas. The evaluation area boundary was refined to better reflect the portions of the area that evaluated as having wilderness characteristics.</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 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 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 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.</p>

		<p>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>
--	--	---