

**Tellico Bald**  
**12,525 acres**

The Tellico Bald area is located in Macon County, North Carolina, 10 miles northwest of Franklin in the Wayah Ranger District of the Nantahala National Forest. This high altitude area is characterized by dense, high elevation old-growth forest. The bed of FS 7114 is the most likely route of the Cherokee trading path from Cowee Town to Tellico. This area is at the heart of one of the largest expanses of public land in the region. The special places are too numerous to name; however, the outcrops of Cliff Ridge and the Rich Cove Forest of DeWeese Creek are two examples. Unfortunately, much of this area is zoned for timber production under the current Forest Plan and the area was impacted by the 500-acre Horseshoe Timber Sale.

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

The Forest Service does not plan to analyze the Tellico Bald Area in any of the draft alternatives, meaning that the area will inevitably be excluded from recommendation for wilderness, and it could go unprotected altogether. If this area is able to retain its unique values, it will need more conservation-minded management under the next Forest Plan.

**Highlights from this evaluation**

- This evaluation overemphasizes the impact of historical logging in this area, which is not evident to the untrained eye
- The evaluation also overemphasizes the impact of old logging roads and wildlife habitat improvements within the area, and agriculture and development outside the area
- The Forest Service seriously exaggerates the number of hikers you can encounter on the Appalachian Trail during the peak season.
- Even after citing the area's outstanding features, the Forest Service claims that the 12,525 Tellico Bald area "does not have wilderness characteristics."

**Evaluation of Wilderness Characteristics and Corresponding Talking Points**

Use any first-hand experience that you have to talk about this area.

USFS Evaluation	How to Comment	TWS Response
Apparent Naturalness		
<p>Much of the area has had historic logging, although there are thousands of acres of natural appearing older forest and heath balds, especially on the steeper slopes and higher elevations. This is particularly true in the core area east of Copper Ridge Bald. Evidence of past timber management and wildlife habitat improvement is most obvious near the area's perimeter. Vegetation management has occurred on</p>	<p>* Evidence of past logging is not evident to the untrained eye.</p> <p>* Logging roads along the area's boundaries and interior are not apparent in leaf out, and naturalness seems intact for the general observer.</p> <p>* As noted in the evaluation, evidence of past timber management,</p>	<p>Evidence of past logging is not evident to the untrained eye, and views from the Appalachian Trail afford what appears to be unbroken forest as one looks into the Little Tennessee Valley and the area's eastern boundaries. Old growth forest begins approximately one mile south of Tellico Bald on the spine of the Nantahala mountains, and large Scarlet Oaks, White Oaks, and Northern Red Oaks are abundant almost to Burningtown Gap. American Chesnut sprouts are also abundant along the Appalachian Trail for over two miles,</p>

<p>167 acres in the past 20 years and associated skid roads are also evident in certain locations.</p> <p>The area has 29.5 acres of wildlife fields maintained by mowing. There are over 11 miles of low- maintenance level NFS roads, many of which are mowed as wildlife fields, access wildlife openings and/or are used as trails. There are seven road stream crossings in the area, some of which have culverts. Inventoried Roaded Natural ROS Setting (buffer of adjacent roads): There is a shelter and a privy along the Appalachian Trail at Cold Springs. Wayah Bald historic fire tower is visible near the southern boundary, and the Wesser Bald fire tower/observation platform can be seen at the northern boundary as northbound hikers descend to Tellico Gap.</p>	<p>wildlife habitat improvements, and roads are most obvious near the area’s perimeter, leaving a core area where these features are not noticeable and wilderness characteristics predominate.</p>	<p>and some are three to four inches in diameter. Logging roads along the area’s boundaries and interior are not apparent in leaf out, and naturalness seems intact for the general observer. Rocky Bald is an outstanding feature, with sweeping views of unbroken forest to the east, as well as significant rock outcrop features.</p> <p>We question the size of the ROS semi-primitive core. Primitive roads (ML 1 and some ML 2 roads) are not supposed to be used in the calculation of SPNM.</p> <p>As noted in the evaluation, evidence of past timber management, wildlife habitat improvements, and roads are most obvious near the area’s perimeter, leaving a core area where these features are not noticeable and wilderness characteristics predominate.</p> <p>The shelter and privy are fairly minor considerations for consideration of apparent naturalness of the area as a whole. Views of Wayah Bald and Wesser Bald fire towers should not be considered as a consideration under natural conditions. The directives criteria under apparent naturalness is <u>“The extent to which improvements <b>included in the area</b> (sec. 71.22 of this Handbook) represent a departure from <u>apparent naturalness.</u>”</u> (emphasis added)</p>
<p>Opportunities for Solitude or Primitive &amp; Unconfined Recreation</p>		
<p>About 28% of the area is currently managed for backcountry recreation, which offers some opportunities for solitude. The Appalachian National Scenic Trail runs north to south along the ridge and intersects the east-west Bartram Trail outside the area at Wayah</p>	<p>*The Forest Service seriously exaggerates the number of hikers you can encounter on the Appalachian Trail during the peak season. Tell the Forest Service that you will never encounter "thousands of thru-hikers along the trail."</p>	<p>While much of the area’s use is concentrated in the southern part of the area around Wayah Bald and Burningtown Gap, the northern end of the area is very remote and offers great opportunities for solitude and unconfined recreation. AT use is heavy during early spring, but drops off steeply following the through hiker</p>

<p>Bald. In the spring, thousands of through-hikers can be encountered along the Appalachian Trail, which detracts from solitude along the trail corridor. The area is adjacent to NFS Road 711 which receives regular use, and SR1397 to the west, and SR1365 to the north. Although SR1397 and 1365 receive relatively little use, vehicular noise is evident at times.</p> <p>Developed residential and agricultural lands are adjacent to the boundary near many of the protrusions, particularly along the northeastern (near Burnett Fields, Tellico) western (Kyle), and northwestern borders (Otter Mountain, Owenby Cove). Low-maintenance level NFS roads within the area are often used by hunters, hikers, horseback riders, and mountain-bikers. Dirty John Shooting Range is located off NFS Road 711, and sounds of gunfire may be audible in southwestern portions of the area. Additionally, the Franklin airport is six miles to the east with flight patterns often crossing the area.</p> <p>Opportunities for primitive and unconfined recreation exist across most of the area, but are mixed with uses not considered to be primitive. Primitive recreation activities within the area include hunting, fishing, hiking, backpacking, horseback riding, backcountry recreation, scenery viewing, and nature study. Other activities inconsistent with wilderness</p>	<p>*Remind the Forest Service that the northern end of this area is very remote.</p> <p>*Tell the Forest Service that they must consider this area within the context of the greater landscape: Tellico Bold sits between Siler Bald and Weser Bald. The concentration of these large areas along the Nantahala is significant for their cumulative acreage and recreational value, coupled with opportunities for solitude and unconfined recreation.</p> <p>* The fact that roads, residential areas, and agricultural areas are outside the area being evaluated does not directly affect solitude or opportunities for primitive recreation. In reality these outside influences have very little effect.</p> <p>*Tell the Forest Service that you support the Nantahala Hiking Club. This local maintaining club of the Appalachian Trail would like this area to be recommended for wilderness.</p>	<p>season, and day hikers can hike to Rocky Bald and Cold Springs gap with few encounters of other visitors. The area sits within the center of two other significant Mountain Treasures areas – Siler Bald and Wesser Bald – separated by lightly used but major FS corridors, but nonetheless the concentration of these large areas along the Nantahala is significant for their cumulative acreage and recreational value, coupled with opportunities for solitude and unconfined recreation.</p> <p>The inclusion of the Appalachian Trail might have some impacts to solitude during certain times, but its inclusion is entirely within reasonable standards – many other designated wilderness areas include the Appalachian Trail or other seasonally well used trails such as the Pacific Crest Trail.</p> <p>The fact that roads, residential areas, and agricultural areas are outside the area being evaluated does not directly affect solitude or opportunities for primitive recreation. In reality these outside influences have very little effect on solitude or opportunity for primitive recreation within the area. These influences certainly are not pervasive. Topography and vegetation screening filter out most sights and sounds. Similarly, while airplane noise might occasionally be present, it is certainly not pervasive and is no more a factor than in many other designated wilderness areas in the east.</p> <p>Mountain bike use on closed NFS roads is more than likely outside the area to be evaluated. To the extent that it is within the evaluated area, it is a management tradeoff that should be considered during analysis not evaluation. Boundary adjustments could be made to allow existing</p>
---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

<p>characteristics include mountain bike use on closed NFS roads.</p>		<p>mountain bike use while still considering a core wilderness area.</p> <p>The Nantahala Hiking Club, the local maintaining Club of the Appalachian Trail, has expressed their support for all of the Mountain Treasure Areas along the AT to be recommended for Wilderness and are prepared to maintain the trail according to Wilderness standards. The Bartram Trail runs east-west and crosses the Appalachian Trail near the very southern end of this Mountain Treasure area at Wayah Bald. This is a key junction that allows for long-distance hiking loop opportunities in this region.</p> <p>We question the size of the ROS semi-primitive core. Primitive roads (ML 1 and some ML 2 roads) are not supposed to be used in the calculation of SPNM.</p>
<p><b>Other Values-Unique or Outstanding Qualities</b></p>		
<p>The area's high ridges, knobs, heath balds, rock outcrops, and dense high-elevation old growth forests are outstanding within the surrounding landscape. A side trail from the Appalachian Trail leads northeast to a rock outcrop on Rocky Bald providing long range views to the Great Smoky Mountains National Park and north of this trail is the remnant of a rock retaining wall constructed by the Civilian Conservation Corps. The Trail of Tears is present in the area. Habitats for rare plants exist within the area.</p>	<p>*Emphasize to the Forest Service that this area contains 1,846 acres of old growth acreage. This forest is outstanding.</p> <p>*Remind the Forest Service that this area contains two State Natural Heritage Area with state significance.</p>	<p>The Tellico Bald Mountain Treasure Area contains 1,846 acres of old growth acreage.</p> <p>This area contains two State Natural Heritage Areas:</p> <p>Wayah Bald/Wine Spring Bald. The Representational rating for this natural area is very high (R2); its Collective rating is exceptional (C1). Under the old NCNHP significance ranking, this area was rated as State significant – a site with one of the best element occurrences in the state. NCNHP proposed this natural area for new priority SIA.</p> <p>Burningtown Bald/Cliff Ridge. The NCNHP Representational rating for this natural area is very high (R2); its Collective rating is very high (C2). Under the old NCNHP significance ranking, this area was rated as State significant – a</p>

		site with one of the best element occurrences in the state.
<b>Size &amp; Manageability</b>		
<p>The Tellico Bald area is 12,525 acres but has a highly irregular shape with numerous protrusions on all sides. Where area boundaries are not coincident with roads they are not easily discernible on the ground. There are no non-federal inholdings but there are 2,083 acres of outstanding or reserved subsurface mineral rights in the area.</p>	<p>* This area's significant size and unique features should dictate the importance of protecting its roadless and natural qualities. Adjusted boundaries could avoid many features that degrade wilderness character.</p>	<p>Though the area has an irregular shape, with some roads and past logging, its significant size and unique features should dictate the importance of protecting its roadless and natural qualities. Adjusted boundaries that include the core of the area could avoid many features that degrade wilderness character. Adjusted boundaries could also avoid subsurface rights.</p> <p>The area provides an accessible and needed wilderness experience that fits with management for the AT as well. The Nantahala Hiking Club, which is the AT maintenance club in this area, has asked that it be recommended for Wilderness.</p>
<b>Conclusion</b>		
<p>Overall, the Tellico Bald area does not have wilderness characteristics. An irregular boundary shape and numerous narrow protrusions affect manageability as wilderness. Given the configuration, sights and sounds from the area roads and from the adjacent residential and agricultural lands affect solitude in some sections. Tellico Bald area has opportunities for solitude and primitive recreation in the area currently managed for backcountry. However, this core area is still relatively small at less than 2,500 acres and would be difficult to manage as wilderness. Additionally, many locations within the area have existing uses and infrastructure which detract from naturalness.</p>	<p>*The Forest Service is absolutely wrong to claim that the Tellico Bald area "does not have wilderness characteristics."</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 from very low to very high degree. And areas will also have different degrees for different wilderness characteristics. 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</p>

		<p>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>
--	--	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------