

Tusquitee Bald
29,156 acres

The Tusquitee Bald area is located south of Andrews, NC in Macon, Clay, and Cherokee Counties on the Tusquitee Ranger District of the Nantahala National Forest. The area encompasses almost the entire Fires Creek watershed, and extends northwest to National Forest boundaries near Andrews, southeast to NF boundaries near Hayesville, and northeast to Tuni Gap.

What’s at stake for this area?

The Forest Service is proposing to only analyze 8,389 acres (out of 29,156 acres) in one of the four draft alternatives: Alternative C. This excludes all but the westernmost portion of the inventoried area and leaves most of the Fires Creek watershed unprotected. The Inventoried Roadless Area acreage alone is 13,791 acres so only analyzing 8,389 acres is simply inadequate.

Highlights from this evaluation

- The evaluation does not mention the 4,000 acres of old-growth forest, much of which is in the western portion (which the Forest Service proposes to drop from analysis)
- Evidence of human impact is noted as detracting from apparent naturalness. However, much of what is in this area is older than 50 years and therefore should be considered an historic quality.
- The evaluation understates the opportunities for solitude and primitive recreation, as well as the cultural significance of this area for the Cherokee.
- The evaluation claims that you can see Andrews and Hayesville from the Rim Trail.
- The evaluation completely understates the presence of important habitat for rare and threatened species.
- Fires Creek Road is used as justification for dropping much of this area. However, roads are commonly “cherry-stemmed’ out of wilderness boundaries.
- The dramatically reduced area that the Forest Service proposes to analyze (dropping around 21,000 acres) is unacceptable and does not capture the potential for solitude and recreation in this area.

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>Many locations within Tusquitee Bald area have natural appearing conditions. This is particularly true along parts of the “Rim” and to the east in the Inventoried Roadless Area. Other parts of the area have recent vegetation treatments, maintained wildlife fields, and low maintenance level</p>	<p>*The evaluation does not mention the presence of 4,000 acres of old-growth forest, much of which is along the west side (which the USFS is proposing to drop from analysis).</p> <p>*Remind the Forest Service that evidence of human impact (such as concrete footings) over 50 years of age is considered historic by the 1975 Eastern Wilderness Areas Act and</p>	<p>The vast majority of the area along the “Rim” does have natural appearing conditions; in fact, there are about 4,000 acres of old growth forest, much of which is along the west side.</p> <p>The Wilderness Society and other groups suggested boundaries that exclude all or most of these features that are listed as detracting from</p>

<p>roads. Some of the roads have culverts and one has a vehicular bridge. There are remnants of concrete footings from a fire tower that once stood at Big Stamp, and over 160 acres of private inholdings where the FS has little influence over future uses. These human modifications, infrastructure, and private inholdings are distributed across various parts of the area, and not concentrated in any one location.</p>	<p>should be noted as such, rather than as detractor from apparent naturalness.</p>	<p>apparent naturalness.</p> <p>Concrete footings from the fire tower: anything over 50 years old is considered historic (reference the Eastern Wilderness Act).</p>
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Opportunities for Solitude or Primitive and Unconfined Recreation

<p>The Tusquitee Bald area provides opportunities for solitude in many locations, especially to the east within the Inventoried Roadless Area. However, sights and sounds of civilization are prominent north and south of the “Rim” where slopes are oriented toward the towns Andrews, Hayesville, and surrounding communities. Near the Fires Creek corridor, where there are FS developed recreation sites, mowed wildlife fields, and open NFS roads, opportunities for solitude are also unlikely.</p> <p>Opportunities for primitive recreation are available throughout the area, including hiking, backpacking, horseback riding, hunting, fishing, and nature study; however, mountain biking is allowed on closed NFS roads in the</p>	<ul style="list-style-type: none"> * The evaluation understates the opportunities for solitude in this area. They are outstanding, and the 26-mile loop Rim Trail alone is unique in this region. * The evaluation completely exaggerates “sights and sounds of civilization” - you cannot see or hear Andrews and Hayesville from the Rim Trail or a reasonable distance from the rim outside of the basin. *The presence of wildlife openings does not equate to a lack of opportunities for solitude. * This area offers outstanding opportunities for recreation, with a trail network that offers numerous options that increase opportunities for solitude. * The diminished area proposed by the USFS for analysis fails to capture much of the solitude potential of the area. 	<p>Most of the Rim Trail and crest of the Inventoried Roadless Area provide outstanding opportunities for solitude with little exposure to human influences. In fact, the area and Rim Trail are unique in the region, providing access to sustained solitude in a loop trail for 26 miles.</p> <p>The trail network provides many different options for loops and point-to-point excursions, making it possible to use the area without crossing roads or encountering other visitors.</p> <p>Sights and sounds of civilization: Although some slopes in the area are oriented towards Hayesville and Andrews, NC, there is little actual influence from these areas due to vegetation screening and geographic isolation. Areas should be considered as a whole in the evaluation process; including these slopes protects the opportunities for solitude provided in the area as a whole.</p>
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<p>area. Overall, the size and configuration of the area does allow for unconfined recreation, especially to the east in the large block of unroaded NFS land managed as backcountry and an Inventoried Roadless Area. In locations north of the “Rim” near Andrews, and south of the “Rim” near Hayesville, recreation users would be more confined to areas between adjacent private lands and the ridgetop. These areas are typically less than a mile wide, and in some cases, are only 1/3 of a mile downslope from the “Rim”.</p>		<p>Multiple trail opportunities throughout the entire rim, including trails coming from the Fires Creek area as well as from outside the Tusquitee Bald area, provide unparalleled opportunities for accessing experiences of solitude and recreation. The SPNM core of the area is substantial consisting of over 15,000 acres and wrapping around most of the rim and slopes.</p> <p>TWS and other groups have suggested boundaries that optimize preserving these experiences while addressing impacts to solitude by existing roads, inholdings, and other infrastructure.</p> <p>The diminished area proposed by the USFS for analysis fails to capture much of the solitude potential of the area.</p>
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Other Values – Unique or Outstanding Qualities

<p>With the Valley River Mountains on the north side and the Tusquitee Mountains on the south, these landforms converge at Tusquitee Bald to form the “Rim”; which encircles the Fires Creek watershed and offers scenic vistas. It also contains habitats for rare plants and animals. Fires Creek and the “Rim” are also valued because the unique recreation opportunities they provide.</p> <p>Fires Creek watershed has been identified as having outstanding resource waters by the North Carolina Division of Environmental Quality, and the Rim Trail</p>	<p>* This area has great cultural significance in Cherokee History. Historical Cherokee trails have been documented in the area, and "Tusquitee" itself means "Land Where the Water Dogs Laughed." Tell the Forest Service that it's important to preserve cultural significance.</p> <p>* In addition, the Trail of Tears is present in the area. The evaluation understates the cultural significance of this area.</p> <p>* The evaluation understates the presence of habitat for rare plants and animals. There are actually two State Natural Heritage Areas in the area, implying that it is an ecologically important area. The Forest Service needs to protect all forms of biodiversity – rare and threatened</p>	<p>The cultural significance of the area has been well documented by ethnographers such as James Mooney in "Cherokee History, Myths and Sacred Formulas". In the Cherokee language, "Tusquitee" means "Land Where the Water Dogs Laughed." Historical Cherokee trails have been documented in the area.</p> <p>Two State Natural Heritage Areas are located wholly or partly within the extensions: Fires Creek Rim/Fires Creek Gorge, Western Valley River Mountains</p> <p>Opportunities to increase the ecological representation of ecological types that are currently under-represented in the</p>
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<p>creates a 25 mile ridgetop loop offering expansive views of the Nantahala Mountains to the east and the Snowbird Mountains to the north. The mountains of Georgia and Tennessee are visible in the distance. Almost all of the “Rim” and the Fires Creek watershed are public lands managed by the Nantahala NF. There is no other place in western North Carolina where the landform and almost contiguous public ownership allow a long-distance, ridgetop, loop trail opportunity. The Trail of Tears is present in the area.</p>	<p>species.</p> <ul style="list-style-type: none"> * The outstanding resource waters in this area need to be protected. These waters support several rare aquatic species, such as crayfish and hellbender, both of which prefer undisturbed habitat. * Fires Creek is home to one of the largest and most robust populations of mountain camellia. This plant is famously difficult to propagate and grow, so it is very important to preserve natural populations. * It is important to protect this area in the face of climate change. The great range of elevation offers excellent opportunity for climate adaptation via species migration up an elevational gradient. * Reiterate to the Forest Service the unique values of the Rim Trail. As the evaluation states, there is no other place in western North Carolina that allows a long-distance, ridgetop, loop trail. 	<p>Wilderness Preservation system include a variety of ecological types especially Appalachian Montane Oak, Appalachian Cove Hardwood, Appalachian Hemlock-Hardwood; Appalachian Oak, Appalachian Oak –xeric; and Small Stream and Riparian.</p> <p>The pristine waters of Fires Creek support several rare aquatic species including Hiwassee Headwaters Crayfish and Hellbender. The rare southern water shrew inhabits the streamside zone as does one of the largest and most robust populations of the rare mountain camellia.</p> <p>The extensive range in elevation offers excellent opportunity for climate adaptation through species adapting through movement along this gradient.</p>
<p>Size & Manageability</p>		
<p>Due to the central corridor along Fires Creek Road being excluded from the area, and almost bisecting it from west to east, the Tusquitee Bald area is essentially broken into three parts: the two portions north and south of Fires Creek, and the eastern section around Tusquitee Bald itself.</p> <p>North of Fires Creek there are several NFS roads, recent vegetation treatments, and a 50 acre private inholding. The slopes north of the</p>	<ul style="list-style-type: none"> *The evaluation presents Fires Creek Road as a detraction from wilderness. However, many designated wilderness areas have roads excluded from the official boundary (“cherry stem”) so that people may have access to the wilderness area. *The Forest Service is saying that the presence of Fires Creek Road breaks the Tusquitee Bald into three areas. However, their own analyses show that this area has a massive core of primitive values. *Reasonable boundaries can be drawn to exclude inholdings and 	<p>The term "bisecting" goes too far in creating a bias in considering wilderness characteristics objectively. Fires Creek Road does provide access into the interior of the watershed, but this type of cherry-stem is not atypical of designated wilderness areas, and provides access for use of the area. We disagree that the area is broken into three parts, because the entire area is continuous SPNM area. In fact the area contains a very large SPNM core of greater than 15,000 acres.</p> <p>The boundaries proposed by TWS and other groups have excluded all</p>

“Rim” look directly down on the town of Andrews and the surrounding community. On the south side of the Fires Creek watershed there are fewer NFS roads and vegetation treatments; however, more of the land base lies south of the “Rim” overlooking the town of Hayesville and its surrounding communities. All of these conditions affect opportunities for solitude and for unconfined recreation in these two portions of the area.

The eastern part of the Tusquitee Bald area is comprised primarily of the Inventoried Roadless Area and backcountry management. This portion of the area provides thousands of acres where there are natural appearing forests with old growth characteristics, opportunities for solitude, and opportunities for primitive and unconfined recreation. Some locations within this eastern portion of the area also have NFS roads, private inholdings, and views of Andrews or Hayesville, but a block of NFS land in excess of 5,000 acres could be delineated to minimize these impacts and allow for the preservation of wilderness characteristics.

roads while maintaining an area that is conducive to wilderness management.

*Again, the Forest Service is saying that you can see Andrews and Hayesville from the Rim Trail, and that this detracts from opportunities for solitude. Views should not impact the agency’s ability to manage this area for wilderness.

*The size of the area that satisfies the Forest Service’s criteria is much larger than the area identified by the evaluation.

of the inholdings and most of the roads mentioned in the evaluation.

The town of Andrews is largely out of view from the Rim Trail. There are no real trails going down the north slope; however, if someone did venture into the area, vegetation screens the view of Andrews. While Andrews is visible from the old fire tower foundation near Big Stamp, this is not atypical of designated wilderness areas. This type of "purity standard" was overturned by the 1975 Eastern Wilderness Act.

Similarly, we are not aware of any views of the Hayesville area within the Tusquitee Bald area. Vegetation and geographic screening would provide little opportunity to see Hayesville from the area. However, if there were views, this would not be atypical of designated wilderness in the east. overlooks Hayesville as it is currently vegetated.

The conditions of the area as described in the evaluation do not actually impact opportunities for solitude and primitive and unconfined recreation.

The size of the area that satisfies criteria for natural conditions, solitude, and primitive recreation opportunities extends beyond the area identified by the evaluation. This larger area should also be manageable. The factors relating to Hayesville and Andrews should not impact the ability to manage this area for wilderness.

Conclusion

At over 29,000 acres, the Tusquitee Bald area is the

Conclusions in the evaluations that judge areas to have no wilderness

largest in the Nantahala and Pisgah National Forest's inventory of areas that may be suitable for inclusion in the National Wilderness Preservation System.

Consequently, characteristics of such a large area differ greatly across the area based on past and current management, boundary configurations, location of constructed features, adjacent land uses, topography, etc. North of Fires Creek there are several NFS roads, recent vegetation treatments, and a 50 acre private inholding. The slopes north of the "Rim" look directly down on the town of Andrews and the surrounding community. On the south side of the Fires Creek watershed there are fewer NFS roads and vegetation treatments; however, more of the land base lies south of the "Rim" overlooking the town of Hayesville and its surrounding communities. All of these conditions negatively affect opportunities for solitude and for unconfined recreation in these two portions of the area.

The portion of the Tusquitee Bald area that has wilderness characteristics is part of the Inventoried Roadless Area surrounding Tusquitee Bald itself in the eastern part of the area. This area provides thousands of acres where there are natural appearing forests with old growth characteristics, opportunities for solitude, and opportunities for primitive and

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.

Because the Tusquitee Bald area is such a large potential wilderness candidate, it is counterintuitive to attempt to limit it to a smaller area that would, in turn, limit its wilderness potential.

Evaluating the degree of wilderness characteristics required by the

unconfined recreation. Some locations within this eastern portion of the area also have NFS roads, private inholdings, and views of Andrews or Hayesville, but an area that excludes these detracting characteristics has been delineated. This adjusted evaluation area is large enough to manage its preservation and use in an unimpaired condition.

directives is not binary – a gradient exists of the degree to which areas and portions of areas meet wilderness characteristics. To confine the selection of Tusquitee Bald area to the highest end of the spectrum is inconsistent with the intent of the directives.

TWS and other groups have proposed boundaries that are less than the entire area but that extend substantially beyond the area identified in the evaluation. The roads and other infrastructure in this area that could affect solitude are excluded from our proposed boundaries. Many of the roads in the Tusquitee Bald area are closed roads that have been inadequately maintained. It is not appropriate to use these unmaintained roads - many of which have the appearance of being a trail – to disqualify a large portion of this area from further analysis when, in reality, these roads have no effect on solitude.