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Comments: GMUG Forest Management Plan Comments

Dear GMUG Planning Team,

The recreation section of the GMUG National Forests Draft Revised Land Management Plan proposes four alternatives for the acreage of summer recreation opportunities (Page 63, Table 8). The No Action Alternative allocates 360,000 acres of primitive recreation while Alternatives B and C allocated even less acreage for primitive recreation. Reducing land area designated for primitive recreation allows for greater recreation allocation for semi-primitive mechanized and semi-primitive motorized recreation. These forms of recreation, motorized in particular, have a greater environmental impact than primitive forms of recreation (Taylor, 2006). Those impacts include soil erosion, soil compaction, damage to vegetation, noise pollution, water pollution, and disturbance to wildlife (Taylor, 2006)[Taylor, R. B. (2006). The effects of off-road vehicles on ecosystems. Texas Parks and Wildlife, 12.]. Similarly, alternatives A, B, and C do not increase allocation for primitive recreation during winter recreation months (Page 64, Table 9). As human development continues to expand and outdoor recreation gains more popularity, the environment has become even more vulnerable to degradation. There has been a sevenfold increase in motorized recreation on U.S. National Forest lands since the 1990s (Wilson, 2008)[Wilson, P. I. (2008). Preservation versus motorized recreation: Institutions, history, and public lands management. The Social Science Journal, 45(1), 194[ndash]202. https://doi.org/10.1016/j.soscij.2007.12.003].

Therefore, it is important that we as a society manage public lands in a more restrictive manner to preserve ecosystem services, biodiversity, and resilience to climate change (Anderson & Mammides, 2020)[Anderson, E., & Mammides, C. (2020). The role of protected areas in mitigating human impact in the world[rsquo]s last wilderness areas. Ambio, 49(2), 434[ndash]441. https://doi.org/10.1007/s13280-019-01213-x]. This is especially important given the likelihood these forms of recreation and tourism will continue to gain popularity over the time frame of the forest management plan. Increasing the area of land designated for primitive recreation designation can alleviate the burden of recreation on the environment while also preserving the

solitude and scenic integrity of primitive recreation. This is why I suggest the use of these aspects of Alternative D, which allocates 812,000 acres of land for primitive recreation during summer and 793,000 acres for primitive recreation during winter, to be included in the main forest management plan.

References

Anderson, E., & Mammides, C. (2020). The role of protected areas in mitigating human impact in the world[rsquo]s last wilderness areas. Ambio, 49(2), 434[ndash]441. https://doi.org/10.1007/s13280-019-01213-x

Taylor, R. B. (2006). The effects of off-road vehicles on ecosystems. Texas Parks and Wildlife, 12.

Wilson, P. I. (2008). Preservation versus motorized recreation: Institutions, history, and public lands management. The Social Science Journal, 45(1), 194[ndash]202. https://doi.org/10.1016/j.soscij.2007.12.003

Dear GMUG Planning Team,

The role of wilderness in the GMUG National Forests Draft Revised Land Management Plan is lacking. In Chapter 3, management area direction, the proposed draft alternatives B and C include minimal to no areas to be analyzed as wilderness (Page 80, Table 17). Draft alternative B allocates 34,000 acres to be analyzed as wilderness while draft alternative C proposes 0 acres. This is far too minimal, especially given the local grassroots effort in the area, such as the Gunnison Public Lands Initiative, which advocates for the designation of more wilderness areas (About Gunnison Public Lands Initiative). Wilderness preservation provides the [ldquo]greatest level of protection for the ecological and social values of lands held in trust for future generations[rdquo] (Tricker & Landres, 2018)[Tricker, J., & Landres, P. (2018). Mapping threats to wilderness character in

the National Wilderness Preservation System. Biological Conservation, 227, 243[ndash]251. https://doi.org/10.1016/j.biocon.2018.09.010]. Given the alarming pressures of anthropogenic climate change and the increased human burden on the environment, it is more important than ever that areas of land are protected and preserved for their natural capital and ecosystem services (Anderson & Mammides, 2020)[Anderson, E., & Mammides, C. (2020). The role of protected areas in mitigating human impact in the world[rsquo]s last wilderness areas. Ambio, 49(2), 434[ndash]441. https://doi.org/10.1007/s13280-019-01213-x]. Wilderness areas provide space for unconfined and primitive recreation that is less impactful on the environment. I strongly support the inclusion of standard MA-STND-RECWLD-02, which would allow areas to be analyzed as wilderness to only allow pre-existing nonconforming uses that do not impair the area[rsquo]s wilderness characteristics. This is beneficial for alleviating human disturbances that could negatively affect flora and fauna. I think that the draft D alternative for areas to be analyzed as wilderness (1.2) should be incorporated into the main forest management plan for the sake of long-term environmental integrity. 261,000 acres of land to be analyzed as wilderness is more progressive and beneficial in the long term than settling on 34,000 acres. Since it will be a minimum of 15 years that a new forest management plan is created, it is important that these areas are set aside and are not subject to any type of exploitation.

References

About Gunnison Public Lands Initiative. GPLI. (n.d.). https://www.gunnisonpubliclands.org/about

Anderson, E., & Mammides, C. (2020). The role of protected areas in mitigating human impact in the world[rsquo]s last wilderness areas. Ambio, 49(2), 434[ndash]441. https://doi.org/10.1007/s13280-019-01213-x

Tricker, J., & Landres, P. (2018). Mapping threats to wilderness character in the National Wilderness Preservation System. Biological Conservation, 227, 243[ndash]251.

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