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Comments: Potential Wilderness Inventory and Evaluation Process Comment

What is Wilderness? In common usage, "wilderness" is used to describe lands that represent some idyllic notion of preservation, calm, ecological balance, and psychological escape. In the public lands world, Wilderness is a formal land designation that can be accomplished only by Congress. The 1964 Wilderness Act was the product of 8 years of Congressional debate requiring 60 bill drafts to reach an agreement. The Act is considered a crowning achievement by some, but it represents perhaps the most restrictive language in the preservation world, defining Wilderness as a place "where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain." 16 U.S.C. 1131. The 1964 Act prohibits commercial enterprises, roads, motorized vehicles or equipment, landing of aircraft, mechanical transport, or any structure or installation. 16 U.S.C. 1133. You cannot ride a mountain bike in Wilderness. You cannot even pull a wheeled cart to remove elk quarters since that is considered "mechanical transport."

Across all agencies, there is over 107 million acres of designated Wilderness nationally! If we somehow wanted to "maximize" our Wilderness by putting all lands under Wilderness designation, we could not as the remaining undesignated lands do not meet the lofty standards of the 1964 Act. Through a web of statutes, regulations, and bureaucratic directives, the agencies have for decades studied lands with possible Wilderness characteristics. Finally, visitor use statistics do not suggest that we need more Wilderness. Nationally, only about 5 percent of user visits to the Forest System are in Wilderness areas.

Wilderness Economics: Wilderness advocates frequently claim new Congressional designations of Wilderness areas will drive economic growth, which claims are supported by generalized assertions by the Outdoor Industry Association (OIA) research findings that outdoor recreation is \$646 Billion dollar a year industry. The relationship of this research and Congressionally designated Wilderness is unclear at best, as the OIA research specifically includes valuations of activities such as motorized recreation, Bicycling, RV camping, and Snowmobiling.

<http://outdoorindustry.org/images/researchfiles/OIA_OutdoorRecEconomyReport2012.pdf>

http://outdoorindustry.org/images/researchfiles/OIA_OutdoorRecEconomyReport2012.pdf The lack of clarity in this relationship is based on the fact these activities are illegal in Congressionally designated Wilderness areas.

In reality, most Americans are, for various reasons, unable or unwilling to enlist in the rigorous adventures of Congressionally designated Wilderness areas. The hunting community has concluded that "access is the most important factor associated with hunting participation that is not a time-related or demographic factor-in other words, the most important factor over which agencies and organizations can have an important influence." This research continues: "Data show that hunters use many different modes of transportation to access the land on which they hunt: 70% use a car or truck (by far the top mode of transportation), followed by walking (51%) and ATV (16%)" <<http://www.nssf.org/PDF/research/HuntingAccessReport2011.pdf>>

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While Wilderness advocates have provided a wide range of their own research to support the position that recreational usage of Wilderness is an economic driver, USFS research does not support this position. USFS research and conclusions are based on over 20 years of user group research, and generally recognized as the best available science. These conclusions are clear and find users excluded by a Congressional Wilderness

designation spend far more per day than those choosing to recreate in Wilderness areas.

<http://www.fsl.orst.edu/lulcd/Publicationsalpha_files/White_Stynes_NVUM2010b.pdf>

http://www.fsl.orst.edu/lulcd/Publicationsalpha_files/White_Stynes_NVUM2010b.pdf The lower per day per visitor spending profile of Wilderness users compounds concerns regarding the limited visitation of the public to Congressionally designated Wilderness areas for recreation. Other researchers have stated this relationship as follows: "The argument often stated by the environmental community that Wilderness is good for local economies is simply not supported by the data. When comparing Wilderness and Non-Wilderness Counties, Wilderness Counties are at an economic disadvantage to their Non-Wilderness counterparts."

<<http://www.environmentaltrends.org/single/article/the-economic-costs-of-wilderness.html>>

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Wilderness and Forest Health Well, if Wilderness does not create economic growth, is that an acceptable tradeoff for the extreme protection of Mother Earth and the ecological sanctity we create through Wilderness? Absolutely not. Hundreds of millions of humans have tipped the ecological balance, and our impacts must be managed. There is a tension inherent in the concept of Wilderness, that areas will be "healthy" if they are left alone. However, our forests face broad-scale ecological threats that require well designed management responses that do not stop at the Wilderness boundary. In New Mexico, we only need to look outside to see the devastation tied to catastrophic wildfires and the pine and spruce beetle outbreaks. Management practices such as treatments of areas where the trees have been effected by beetles would have created age class diversity, enhanced the vigor of remaining trees, and improved stand resiliency to drought or insect attack-such as timber harvest and thinning - all of which are prohibited by wilderness designation.

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