

**Alpine Lakes Protection Society • Center for Biological Diversity • El Sendero
Endangered Species Coalition • Federation of Western Outdoor Clubs
Friends of Bumping Lake • Friends of the Earth • Friends of Wild Sky
Issaquah Alps Trails Club • The Mazamas • Middle Fork Outdoor Recreation Coalition
North Cascades Conservation Council • Olympic Forest Coalition • Sierra Club
Washington Native Plant Society • Western Lands Project • Wildlands CPR**

August 23, 2012

TO: Cynthia Wilkerson, TWS
Steven Malloch, NWF
Gregg Bafundo, TU
Michael Garrity, AR

RE: **Yakima Plan – Lands Component – your letter dated August 10, 2012**

Proposed National Recreation Areas – our letter dated March 11, 2012

As organizations that have worked hard over years or decades to build and enhance support for the protection of Washington's wild lands, waters and endangered species, we are writing to express our concerns about your letter dated August 10, 2012 inviting many of us to participate in a series of meetings facilitated by Bill Ross, to discuss the January 4, 2012 proposal of the Watershed Lands Subcommittee of the Yakima River Basin Water Enhancement Project (YRBWEP) Workgroup. We cannot accept the invitation without clarification as to statements and omissions in your letter that are important to the fairness of the upcoming facilitated process.

(1) **Preconditions for participation.** Your invitation letter was emailed to us on August 10, 2012 as a Word file named "Washington Conservation Community Workgroup Invite Letter 8-9-12" and it refers to formation of an entity called "Washington Public Lands Advocates Workgroup." Your letter states in part:

"Participants from the public lands advocates organizations will consist of those who by self-selection have agreed that they are supportive of the overall purposes and intent of the Yakima River Basin Water Enhancement Project Integrated Plan. Participants take part in this endeavor with the express goal of making the Integrated Plan more effective in its stated goals and principles."

We are willing to meet with other advocates to provide our views on positive and negative elements of the Yakima Plan. However, we cannot agree to your letter's proposed requirement that participants "have agreed that they are supportive of the overall purposes and intent of the ...Plan", nor do we agree "with the express goal of making the Integrated Plan more effective in

its stated goals and principles,” because these provisions are overbroad and ambiguous, as the Plan EIS is about 900 pages long, and endless arguments could be made about what overall purposes, intent, goals and/or principles are contained in the Plan. The above-cited language could be construed to act as a barrier to participation by advocates with legitimate concerns about the Plan, so we ask that you strike it altogether.¹

These meetings are being proposed because there is controversy about whether the Plan (or pieces of it) should be supported or not. For workgroup organizers to seek a purported resolution of this controversy by requiring participants to take what could be interpreted as an oath of loyalty to the Plan in order to even be heard is unfair and counterproductive. This is especially true of organizations that were not represented in the Yakima Workgroup and Watershed Lands Subcommittee when the Plan and NRA Proposal were written. If we participate in discussions with you, please confirm that you will not expressly or implicitly attribute to us support or endorsement of things we do not in fact support or endorse.

We insist on serious reconsideration of the issues previously decided without our input – including deletions from the proposal, and not merely “additions to the existing proposal.”

We cannot agree to be part of the proposed “Washington Public Lands Advocates Workgroup” until we collectively agree to the goals and groundrules for participation (as well as how dissenting positions will be handled publicly if they should arise). It is obviously of concern that we have control over how our potential participation in the Washington Public Lands Advocates Workgroup will be characterized. It is very important to each organization that its participation will not be construed as expressly or implicitly endorsing a provision of the complicated Plan that it does not.

(2) **Process direction.** We believe the Bill Ross process should be open and transparent. Because of the controversy about the Plan, and due to past concerns about Plan process, we would appreciate more information on how the meetings will be facilitated, including copies of any contract(s) or memoranda or instructions or direction relating to the work of Ross Strategic regarding any aspect of the Yakima Plan. Please clarify whether the Bureau of Reclamation and/or Department of Ecology are directing this process.

(3) **National Forest regulatory processes.** As we said in our March 2012 letter, the NRA Proposal undermines two long-awaited administrative processes in which conservation and recreation groups are heavily engaged and have committed significant resources and time. The first is the Okanogan-Wenatchee National Forest Plan Revision, which offers a rare opportunity to advocate through a public process for the agency (the U.S. Forest Service) to make

¹ Your August 23, 2012 emailed memorandum “Response to Questions” just adds to the confusion. For example, it says “participation does not constitute endorsement of the Plan” (and you will honor requests to not be associated with the final recommendations), but it then goes on to refer to “the goals which we are being asked to support in order to participate,” so you still need to eliminate the “support” precondition for participation.

recommendations to Congress for Wilderness and Wild and Scenic River designations on this Forest. The second is the Okanogan-Wenatchee National Forest Travel Management Plan, which determines which roads and trails will be open to motorized use, and which trails will not be open to motorized use (i.e. ATVs, motorcycles, and 4x4s on trails, or not). The Travel Management process implements the Nixon-Carter Executive Orders on off-road vehicle use on federal lands; we have been waiting 40 years for this Forest Service process to designate motorized versus non-motorized use in this National Forest. Your invitation letter asserted the “potential for both consistency and reinforcement” between the existing National Forest processes and the Lands Subcommittee’s NRA Proposal, but your letter fails to acknowledge the potential for the opposite to occur: inconsistency and conflict between the two efforts, resulting in waste, confusion and counterproductive worsening of problems. To be clear: *The NRA Proposal in the Yakima Plan process undermines the National Forest processes and poses numerous threats to the ecosystem, watersheds, and non-motorized recreational opportunities. Designation of motorized and non-motorized routes and areas should be moved out of the Yakima Plan and into the existing National Forest regulatory process, where it belongs.*

We remind you that our concerns we raised in our March 11, 2012 letter to the Workgroup (attached) have not been answered. Will these be addressed before or during the meetings facilitated by Bill Ross?

(4) **Inclusion.** As we said in our March 2012 letter, the concerns expressed by our organizations as well as many of our partners in the conservation and recreation community and the U.S. Forest Service reflect a lack of stakeholder involvement in the development of the Lands Subcommittee proposal. Conservation Northwest wrote that the NRA Proposal has caused “mistrust” in our community, and that the NRA proponents needed to “raise their game.” In light of this concern, and our communication of it to you, we are further concerned that your August 10 invitation list for the Bill Ross meeting neglected to include many organizations that signed our March 2012 letter. In particular, please confirm that the following organizations are invited to the Bill Ross meetings:

- Federation of Western Outdoor Clubs
- Friends of Wild Sky
- The Mazamas
- Olympic Forest Coalition
- Western Lands Project

(5) **Additional process defects.** In reviewing our March 2012 letter, please note that significant facts arose after our March 2012 letter was written and approved. In March 2012, the January 4, 2012 NRA Proposal was incorporated into the Final EIS of the Yakima Basin Integrated Plan (YBIP) although the NRA Proposal had not been mentioned in the Draft EIS. The public comment period for the Draft EIS had ended on January 3, 2012, the day before the NRA

proposal was published, so the public was denied the opportunity to comment on the NRA Proposal.

(6) **Timing of RSVPs.** Please be aware that due to the Cle Elum fire and/or summer vacations, several other organizations will not finish processing your invitation letter by its requested August 24 response date.

Thank you for acknowledging and responding to this letter.

Rick McGuire, President
Alpine Lakes Protection Society

Kieran Suckling, Executive Director
Center for Biological Diversity

Gus Bekker, President
El Sendero

Brock Evans, President
Endangered Species Coalition

Joan Zuber, President
Federation of Western Outdoor Clubs

Chris Maykut, President
Friends of Bumping Lake

Ben Schrieber, Tax Analyst
Friends of the Earth

Mike Town, President
Friends of Wild Sky

Dave Kappler, President
Issaquah Alps Trails Club

Doug Couch, President
Mazamas

Mark Boyar, President

Middle Fork Outdoor Recreation Coalition

Karl Forsgaard, President
North Cascades Conservation Council

John Woolley, President
Olympic Forest Coalition

Mark Lawler, National Forests Chair, Washington State Chapter
Sierra Club

Dean Longrie, President
Washington Native Plant Society

Janine Blaeloch, Director
Western Lands Project

Bethanie Walder, Executive Director
Wildlands CPR

Attachments

cc (w/attachs):

US Interior Secretary Kenneth Salazar
US Bureau of Reclamation Commissioner Michael Connor
Okanogan-Wenatchee National Forest Supervisor Becki Heath
Cle Elum District Ranger Judy Hallissey
Governor Christine Gregoire
YRBWEP Workgroup
Bill Ross
Other Bill Ross invitees