

Please OPPOSE the National Recreation Area (NRA) Proposal

A March 11, 2012 letter signed by 26 non-motorized recreation and conservation organizations strongly opposed the National Recreation Areas (NRAs) as proposed in the “Watershed Land Conservation Subcommittee Proposal,” a 19-page report dated January 4, 2012 (see excerpts on reverse side).

Substantive objections to the NRA Proposal include the following:

- Off-road vehicles (ORVs) have significant environmental impacts.
- The proposed NRAs would increase ORV use, which would increase impacts.
- Advances in technology allow ORVs to access formerly inaccessible places, and this increases the likelihood of trespass off of the designated routes that would be open to use.
- It is unclear how the proposed NRAs would protect key habitat functions, and it seems unlikely that they could do this with their limited budgets and staffing, especially for enforcement.
- ORVs cause user conflicts with non-motorized users and displace people and wildlife.
- A statutory designation is radically different from an administrative designation.
- Problems with a statutory designation include:
 - Executive Orders governing ORV use of federal lands can't be enforced.
 - The designation is redundant and unnecessary because ORV use does not need Congressional authority and designation; the use can and does occur all over Washington State.
 - The NRA Proposal would overrule current resource protections that many conservation groups have worked hard to obtain, such as Late Successional Reserve (LSR) and Adaptive Management Area (AMA) protections.

Procedural objections to the NRA Proposal include the following:

- The Yakima Integrated Plan Draft Programmatic Environmental Impact Statement (DPEIS) failed to analyze the NRA Proposal.
- There was no extension of the DPEIS comment period, but the NRA Proposal was published the day after the DPEIS comment period closed.
- Subcommittee meetings were held without notice to the public and/or were closed to the public.
- The Land Subcommittee published the NRA Proposal without conducting due diligence, and without adequately analyzing the impacts of the NRA Proposal.
- The Land Subcommittee published the NRA Proposal without consulting or even notifying the many conservation and non-motorized recreation organizations working these issues in the same geography.
- The Land Subcommittee published the NRA Proposal without even notifying the National Forest District personnel who would be required to manage this land and the increased number of ORV users NRAs would bring.

The 26 organizations signing the March 11, 2012 letter stating the above objections are: Alpine Lakes Protection Society, Aqua Permanente, Center for Biological Diversity, Center for Environmental Law & Policy, El Sendero, Endangered Species Coalition, Federation of Western Outdoor Clubs, Friends of Bumping Lake, Friends of the Earth, Friends of the Teanaway, Friends of Wild Sky, Issaquah Alps Trails Club, Kittitas Audubon Society, Kittitas County Conservation Coalition, Mazamas, Middle Fork Outdoor Recreation Coalition, North Cascades Conservation Council, Olympic Forest Coalition, Seattle Audubon Society, Sierra Club, Washington Native Plant Society, Wenatchee Mountains Coalition, Western Lands Project, Western Watersheds Project, Wilderness Watch, and Wildlands CPR.

<http://www.usbr.gov/pn/programs/yrbwep/2011integratedplan/meetings/wtrlandssubfinal.pdf>

Bureau of Reclamation website – excerpts of National Recreation Area Proposal, from page 1:

Yakima Basin Study
Proposed Integrated Water Resource Management Plan
Watershed Land Conservation Subcommittee Proposal
January 4, 2012

and from page 13:

