

March 13, 2012

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Yakima River Basin Water Enhancement Project Work Group
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Dear Work Group Members:

As organizations that have worked hard over the last decade to build and enhance support for the protection of Washington's wild lands and waters, we are writing to express our concerns about the recent proposal including congressional designations put forward by the Watershed Lands Subcommittee (WLS) of the Yakima River Basin Water Enhancement Project (YRBWEP) Work Group.

History of Engagement in Past Public Lands Legislative & Administrative Proposals

Our organizations have committed substantial capacity and resources over the past five years into two significant and historic administrative public processes associated with the Okanagan-Wenatchee National Forest (OWNF), the Forest Plan and the Motorized Travel Management Plan revisions. The OWNF forest plan revision, which began in 2005, marks the first opportunity (and obligation) by the Forest Service to engage the public in a public process to recommend roadless areas as wilderness and evaluate rivers for wild and scenic eligibility within the forest planning process. Further, the forest plan affords an opportunity to designate large tracts of inventoried roadless areas for non-motorized backcountry recreation. The WLS proposal would essentially stunt this process by legislating land management designations before the public process is complete.

Pursuant to the 1994 Off Highway Vehicle (OHV) Planning Rule, for the first time all national forests are required to proactively designate authorized off road vehicle routes (i.e., trails) for summer motorized recreation in order to address the problem of unmanaged off road vehicle use. The draft plan (EIS) for the motorized travel management plan for the Okanagan-Wenatchee National Forest is scheduled for later this year, offering a historic opportunity to direct sustainable OHV use on the forest as part of a public process.

Additionally, our organizations have all been involved in the strategic planning and implementation of recent public-lands legislative proposals in Washington State. Our coalition-based efforts succeeded in establishing the Wild Sky Wilderness, the first designated wilderness on national forest lands in Washington State in a quarter century, under the leadership of Senator Patty Murray and Congressman Rick Larsen in 2008. Our organizations have also played a leadership role in efforts to designate additions to the Alpine Lakes Wilderness and Wild and Scenic River protections for the Middle Fork Snoqualmie and Pratt Rivers, currently moving through Congress under the leadership of Senator Murray and Congressman Dave Reichert.

For the last three years, most of our organizations have been working with local stakeholders on the Olympic Peninsula to advocate for additional wilderness and wild and scenic rivers designations as well as willing-seller additions to Olympic National Park. Last year, Senator

Murray and Congressman Norm Dicks put forward their own congressional proposal for the Wild Olympics to solicit additional feedback from local stakeholders before introducing legislation.

And finally, our organizations are each involved in a more recent campaign, Cascades Wild, a Puget headwaters initiative which seeks to advocate for wilderness and wild and scenic river protections for the upper watersheds of the west slope of the North Cascades and the rivers that connect these special areas to the ailing Puget Sound.

Response to the Watershed Lands Subcommittee Report

On January 4, 2012, the Watershed Lands Subcommittee of the YRBWEP published on the U.S. Bureau of Reclamation Pacific Northwest Region's web site a report outlining elements of a proposal including congressional designations such as proposed wilderness and wild and scenic river designations and motorized and non-motorized backcountry elements of two National Recreation Areas (NRA).

We were disappointed that none of our organizations were asked to review or give formal input to the proposal nor were we informed about the report before or when it was made public. Based on our history and experience in working on wilderness and wild and scenic proposals statewide, we feel that broader input would have been helpful to the Subcommittee. If this proposal is to move forward, a clear process for stakeholder input needs to be defined that addresses the issues below.

Our organizations are writing to express a several concerns about the process, strategic approach and content of that proposal.

- The proposal undermines two long awaited administrative processes that the broader conservation and recreation communities are engaged in and have committed significant resources and time. The first is the Okanagan-Wenatchee National Forest Plan Revision which offers the first opportunity to advocate through a public process for the agency recommended wilderness and wild and scenic rivers. The second is the Okanagan-Wenatchee National Forest Motorized Travel Management Plan which, for the first time would designate suitable off road vehicle routes on the forest – a key step toward the broader goal of balancing motorized and non-motorized recreation management. Both of these processes are only at the scoping stage and draft plans (in the form of an EIS) are expected out later this year. The WLS proposal would freeze the current scoping level of recommended wilderness, and backcountry motorized recreation without the benefit of the draft plan or subsequent stakeholder feedback through this process.
- The two National Recreation Areas in the WSL proposal fall short of striking a balance between motorized and non-motorized recreation management. As a whole, the WLS plan proposed 41,000 acres to be legislatively designated for backcountry motorized recreation while only managing 1,000 acres for non-motorized recreation. While the proposal recommends 21,000 acres of wilderness (which, if added to the non-motorized total, is still almost half the motorized area) these acres would necessarily exclude some non-motorized users such as mountain bikers, who do not seem to be accounted for in the

WSL proposal. In addition, the proposal fails to address the current lack of winter travel planning. Our organizations have advocated for four-season non-motorized backcountry recreation areas.

- Our experience tells us that stakeholder outreach and collaboration on a proposal *before* releasing it publicly with boundaries and maps will foster the most productive and informed feedback to move a proposal successfully forward. We are concerned about the strategic approach to make detailed legislative proposal recommendations (i.e., wilderness and motorized and non-motorized NRA acreages, and wild and scenic river boundaries) without direct formalized stakeholder outreach on the proposal itself to key organizations representing hikers, climbers, paddlers, mountain bikers, equestrians and motorized users. In our experience on campaigns like Wild Sky, Alpine Lakes and Wild Olympics, we have made it a point as a community to do significant direct stakeholder outreach on a proposal before releasing it publicly with boundaries and maps in order to foster the most productive and informed feedback moving forward. 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 engagement in the development of the WSL proposal.

Thank you for your consideration of these comments as you contemplate the next steps of the broader initiative.

Sincerely,

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CC: Senator Patty Murray
Senator Maria Cantwell
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