



National Association of Conservation Districts

January 31, 2011

The Honorable Ken Salazar, Secretary
Department of Interior
1849 C Street N.W.
Washington, DC 20240

Re: Department of Interior; Secretarial Order 3310

Dear Secretary Salazar,

On behalf of the National Association of Conservation Districts (NACD) and America's 3,000 conservation districts, I am writing to express our concerns in regard to the Department of Interior's (DOI) recent issuance of Secretarial Order No. 3310, which would overturn the established moratorium on new wilderness inventories on public land. The Order directs the Bureau of Land Management (BLM) to begin to inventory, designate, and manage federal lands as wilderness independent of the United States Congress.

Secretarial Order 3310 undermines the established public process for land use planning and expressly violates the intent of the Federal Land Policy and Management Act (FLPMA) as only Congress has the authority to designate lands as wilderness. Further, as local governments, many of our member districts have participated as cooperating agencies in the Resource Management Plan process and as such this order has derailed these planning processes.

Conservation Districts, as local governments should be fully involved as affected partners in any process to designate wilderness. The designation of wilderness areas has a tremendous impact on the natural resource management and conservation programs and projects that are implemented by conservation districts. As well, the designation of wilderness areas has had detrimental impacts to the overall resource health due to the inability to effectively manage natural resources within these restricted areas.

This order gives the BLM immediate authority to "designate appropriate areas with wilderness characteristics under its jurisdiction as 'Wild Lands' and to manage them to protect their wilderness values." We believe this order represents a considerable departure from the method for designating lands as "Wilderness Areas" specified in the Wilderness Act of 1964. The Wilderness Act gives the U.S. Congress -- and only the U.S. Congress -- the power to designate public lands as protected "Wilderness Areas." Secretarial Order 3310 circumvents Congress and the federal rulemaking process by designating potentially millions of acres of publicly owned lands in western states as de facto wilderness under a new, loosely defined "wild lands" category.

National Headquarters
509 Capitol Court, NE, Washington, DC 20002
Phone: (202) 547-6223 Fax: (202) 547-6450
www.nacdnet.org

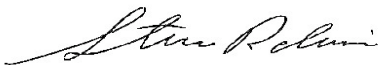
The directive states, "In accordance with Section 20I of FLPMA, the BLM shall maintain a current inventory of land under its jurisdiction and identify within that inventory lands with wilderness characteristics that are outside of the areas designated as Wilderness Study Areas and that are pending before Congress or units of the National Wilderness Preservation System." In fact, Section 20I of FLPMA directs an inventory of all resources and resource values on BLM lands and does not single out wilderness. The order singles out wilderness characteristics, and ignores other resources, ignoring multiple-use management. If a new inventory is going to occur, we suggest all multiple-use resources be included so a rational and responsible decision can be made.

We believe public lands should be managed in a way that provides the greatest benefit to the public. The multiple-use philosophy -- which encourages the environmentally responsible use of public lands for conservation, recreation, and economic purposes -- is the best way to accomplish that goal. Multiple-use has been the bedrock for many rural economies for decades. Conversely, an ambiguous "wild lands" designation based on "wilderness characteristics" is not a good management approach.

If a portion of land is deserving of wilderness designation, the Administration should engage Congress, not attempt to work around it. This new "wild lands" policy introduces more uncertainty and will arbitrarily delay the reasonable use and development of our public lands.

NACD respectfully requests that the Department of the Interior immediately rescind Secretarial Order 3310.

Sincerely,



Steve Robinson
President