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NWMA Strongly Opposes Secretarial Order 3310

Wild Lands Policy is an assault on the multiple-use management of our federal public lands

Secretarial Order 3310, issued December 22, 2010 after Congress adjourned, directs BLM to inventory and review once again millions of acres of public lands to see if they qualify for inclusion in a new, expansive category of protected lands called Wild Lands. The order unilaterally set in place policies that extend wilderness protections to a yet-to-be determined amount of land that might not qualify for Wilderness designation.

The new Wild Lands Policy outlined in Secretarial Order 3310 unnecessarily restricts access to our federal public lands and is a job-killing policy that threatens our Nation's economic security. It will lead to an increased dependency on foreign sources of strategic minerals and metals, threatening our national security and making the goal of energy independence impossible.

- The Wilderness Act of 1964 gives Congress, and only Congress, the statutory authority to create new Wilderness areas. The Wild Lands order is a clear attempt to circumvent the law and allow the Administration to create *de facto* Wilderness areas without Congressional approval.
- Secretarial Order 3310 elevates wilderness characteristics above all other multiple-uses in violation of the Federal Land Policy and Management Act (FLPMA).
- This arbitrary edict is already causing endless bureaucratic delays that will lead to litigation and restrictions that could completely lock-up much of the large and needed store of wealth and recreational opportunities our vast system of public lands can provide.
- The Wild Lands Policy allows project opponents to interfere with proposed projects on federal land.
 - Project opponents will be able to assert that proposed project areas are on lands with wilderness characteristics and should thus be off-limits to the proposed development
 - BLM will be forced to evaluate these claims in environmental review documents prepared for proposed projects, adding another regulatory hurdle to the permitting process.
- Rural communities that depend on public lands for their livelihoods already have some of the highest unemployment rates in the country due to onerous existing federal restrictions. This order further threatens their livelihoods and the ability of the affected states and communities to provide public education and other basic services.
- BLM currently manages 8.7 million acres of designated Wilderness and 13 million acres of Wilderness Study Areas that are managed for "non-impairment of wilderness characteristics." Even if Congress legislatively releases a Wilderness Study Area from further consideration for inclusion in the Wilderness Preservation System, the released land could still be subject to the wilderness-like protections of the Secretary's order.