



C. L. "BUTCH" OTTER
GOVERNOR

January 12, 2011

Secretary Ken Salazar
United States Department of the Interior
1849 C Street, NW
Washington, DC 20240

Re: Secretarial Order 3310

Dear Secretary Salazar,

I am extremely disappointed with your recent decision to issue Secretarial Order 3310. It reflects the same type of "top-down," "one-size-fits-all" management approach to which Idaho was subjected during the waning hours of the Clinton Administration and Chief Forester Mike Dombeck. Without any state or public input, the Interior Department has circumvented the sovereignty of states and the will of the public by shifting from the normal planning processes of the Federal Lands Policy and Management Act ("FLPMA") to one that places significant and sweeping authority in the hands of unelected federal bureaucrats.

In your press conference, you said the order would "restore balance" and eliminate the tired debate between multiple-use activities and protecting backcountry areas. This assumption rests on a false premise. Suggesting that current BLM practices favor multiple-use activities over preservation simply ignores the reality that the agency has succumbed to endless bureaucratic recalcitrance, resource constraints and lawsuits by environmental groups. This order will only exacerbate these problems.

The Interior Department's attempt to soft-peddle the real, on-the-ground impact of this policy is equally disappointing and unavailing. The BLM's draft policy makes it clear that areas designated as "Wild Lands" will carry a heavy presumption of de facto "W"ilderness management. As you are undoubtedly aware, this type de facto "W"ilderness designation by administrative fiat was categorically rejected by Judge Brimmer in the State of Wyoming's challenge to the 2001 Clinton Roadless Rule.

In light of these and numerous other concerns, I ask that you immediately withdraw this Secretarial Order and initiate proper federal rulemaking pursuant to the Administrative Procedure Act. Clearly, this type of sweeping change without public input, proper notice and environmental compliance – including the National Environmental Policy Act – cannot engender the necessary support and inevitably will lead to endless lawsuits.

As Always—Idaho, "Esto Perpetua" (unless this Secretarial Order stands)

C.L. "Butch" Otter
Governor of Idaho

C: Bob Abbey, BLM Director
Steve Ellis, BLM State of Idaho Director

State Congressional Delegation