

BMHC

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September 16, 2004

Content Analysis Team
ATTN: Roadless State Petitions
USDA Forest Service
P. O. Box 221090
Salt Lake City, UT 84122
Email: statepetitionroadless@fs.fed.us
Re: Roadless Areas

In 2001, the Clinton Administration, by administrative rule, added 58 million acres identified as roadless by the United States Forest Service. The rule has been challenged by nine lawsuits. The rule has not been implemented, but the Forest Service has issued an interim directive to conserve the roadless areas.

The challengers of the rule have pointed out that some of the areas designated as roadless do in fact have roads in them; millions of the acres affected are in danger of wildfire and some state and private lands are landlocked by the rule.

The Bush Administration recently proposed a new procedure for accessing national forest areas inventoried as "roadless" by proposing to afford state governors the opportunity to petition the Forest Service to identify areas to be included in the roadless designation and to identify ways to protect the forest.

Critics of the Bush Administration proposal contend that it would likely eliminate protection for most of the 58 million acres and that areas protected under the Clinton Administration rule constitute most of the large unfragmented forest blocks remaining in the United States.

BMHC has developed an environmental policy statement that addresses the issues raised by the debate over roadless areas:

"We recognize that large unfragmented forest blocks that are relatively unaffected by human activities may present unique opportunities to protect our environment. We support consensus-based efforts involving all stakeholders to identify such areas and to develop plans for their protection along with remnant populations of endangered indigenous tree species and core habitat for endangered species. We support sustainable forest management and harvesting plans outside these protected areas to provide economic opportunities with minimum impact on the environment."

Accordingly, BMHC supports consensus-based decisions regarding the designation of roadless areas. We believe that litigation is not the best approach to resolve these issues. The new rule proposed by the Bush Administration does not appear to be designed to reach consensus-based decisions involving all stakeholders. We encourage the Forest Service in its proposed rules to make sure that access is afforded to all interested parties in identifying roadless areas for protection and that the process include consideration of maintaining large unfragmented forest blocks taking into consideration protection from fire and disease.



Yours truly,

Paul S. Street, Senior Vice President,
Chief Administrative Officer, General Counsel
and Corporate Secretary