

Idaho Conservation League \_ Greater Yellowstone Coalition \_ Idaho Trout Unlimited \_  
Hells Canyon Preservation Council \_ The Lands Council \_ Selkirk Conservation Alliance \_  
Friends of the Clearwater

Dale Bosworth  
Chief, U.S. Forest Service  
1400 Independence Ave., SW  
Washington, D.C. 20250-0003

March 30, 2006

Dear Chief Bosworth:

We are a coalition of conservationists, hunters, anglers, backpackers, and hikers. We are writing to you concerning the future of Idaho's last wild forests and the benefits these last roadless forests provide to the citizens of Idaho as well as the benefits they provide to all Americans who share ownership of these national treasures.

On May 5, 2005, the Department of Agriculture announced the adoption of a final rule requiring Governors to file petitions with the Forest Service in order to receive protections for roadless areas within their states above those afforded by the forest planning process.

According to the Rule, any such petition must be submitted to the Secretary of Agriculture no later than November 13, 2006. After the petition is submitted, it will be reviewed by a National Advisory Committee that will provide advice and recommendations to the Secretary on any subsequent State-specific rulemakings within 90 days.

If the petition is accepted, the Forest Service shall be directed to initiate notice and comment rulemaking to address the petition.

According to a statement by Agriculture Secretary Mike Johanns concurrent with the issuance of the rule, the rule would, "advance President Bush's commitment to cooperatively conserve inventoried roadless areas within our national forests."

Similarly, on September 6, 2005, Under Secretary of Agriculture Mark Rey stated, "we are providing interim protection to roadless areas, pending the development of state specific rules provided for in our 2005 rulemaking."

On February 9, the Governor of Washington joined California, Oregon and New Mexico in challenging the legality of the repeal of the 2001 Roadless Rule. That suit has also been joined in Amicus filings by the states of Maine and Montana. The Rule has also been challenged in court by 20 conservation organizations.

On February 28<sup>th</sup> of this year, over a quarter of a million American's petitioned the Department of Agriculture pursuant to the Administrative Procedures Act to reinstate the 2001 rule. The act requires a prompt determination by the agency.

In light of the legal clouds surrounding the new rule, the unprecedented petition for reinstatement, and consistent with the administration's stated intent to "cooperatively conserve inventoried roadless areas within our national forests," and provide "interim protection to roadless areas, pending the development of state specific rules," we ask the Forest Service to suspend any projects in inventoried roadless areas that might disqualify areas or portions of areas from protection, or degrade their special roadless qualities, and to halt and withdraw all such

projects under development (see attachment) as long as the disposition of these areas remains unresolved.

Consistent with these statements, and in order to ensure that no actions are taken which might preclude a full range of options for consideration by the state, we write to request that the Forest Service agree to not propose projects in inventoried roadless areas that would alter the roadless qualities of the areas, and to halt and withdraw all such projects under development (see attachment) until the Forest Service has completed and adopted final rulemaking to establish management direction for these areas for Idaho's National Forests.

In the 2005 Final Rule, 36 C.F.R. § 294.12-294.14, the Department of Agriculture asked each state, at significant taxpayer expense, to review and present recommendations on the management of existing Forest Service roadless areas. In response, Idaho Governor Dirk Kempthorne, announced a plan in which individual counties throughout the state would conduct their own public hearing and comment process. Individual counties would then submit recommendations to the governor regarding the suggested management changes for roadless areas in their county. In light of the fact that the petition process has not been completed in Idaho, and Idaho's governor has yet to submit a petition to the Department of Agriculture, it would be inappropriate for the Forest Service to approve or implement projects in Idaho's roadless areas at this time.

The roadless areas of our national forests provide Idaho's citizens not only rich scenic and recreational opportunities, but also serve as a part of the economic foundation of our state. Decisions regarding the management of these lands as roadless areas must be afforded significant consideration and weight. Indeed, Americans have spoken in favor of protection of all these areas. Moreover, decisions to take actions which may disqualify areas or portions of areas from protection, or degrade their roadless qualities and values should not be made as long as the dispositions of these areas remains unresolved.

We look forward to your response.

Respectfully,

**Idaho Conservation League**

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Encl: Project List (Attachment 1)

## Attachment 1

By our calculation, the Forest Service currently is proposing at least 13 projects (See Table 1) in inventoried roadless areas in the state of Idaho. If all these projects were approved as proposed, Idaho would lose an estimated 4,100 inventoried roadless acres. Many of these projects are still in the scoping phase and there is a likelihood that the number of inventoried roadless areas acres impacted could increase.

**Table 1.** Current and proposed projects within inventoried roadless areas on National Forests in Idaho.

Project	Forest	Roadless area acres	Current Status
Simplot Phosphate Mine	Caribou-Targhee	17	EIS for mine expansion in process
Rising Cougar Timber Sale	Idaho Panhandle	Approximately 4,000	DEIS due spring 2006
Big Creek Fuels Reduction	Payette National	?	Rescoping
Yellowpine Fuels Reduction	Payette	?	Rescoping
Eiguren Ranch Fuels Reduction	Payette	?	Rescoping
Johnson Creek Fuels Reduction	Boise	?	Prescoping
Three Basin Timber Sale	Caribou-Targhee	80	EIS in process
Silver Button Mine Exploration	Idaho Panhandle	?	Rescoping
Riggins Temporary Mining Roads	Salmon-Challis	3.0	Categorically Excluded in August 2005
North Plat Exploration	Salmon Challis	0.5	Proposed CE
Raft River Road	Sawtooth	?	CE
Big Creek/Cold Creek Recreational Access	Salmon-Challis	?	Proposed CE
Warm Springs Fuels Reduction	Sawtooth	19	Proposed CE
Cape Horn Powerline Fuels Reduction	Salmon-Challis	0	Roadless entry dropped, maybe be some thinning in IRA next to powerline corridor without road construction – Proposed CE
Job Creek Timber Sale	Sawtooth	53	Rescoping
Eddy Basin Prescribed Burn	Salmon-Challis	?	?

Eightmile Prescribed Burn	Salmon-Challis	?	CE
Joy/Junior Mineral Exploration	Salmon-Challis	0.02	Proposed CE
Montana Gulch Suction Dredging	Salmon-Challis	?	Proposed CE

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As detailed in the preceding letter, we hereby request that these projects, which would alter the roadless qualities of Inventoried Roadless Areas in the State of Idaho, precluding a full range of options for their protection, be halted and withdrawn.