

**Southern Appalachian Forest Coalition • Southern Environmental Law Center
Western North Carolina Alliance • Southern Appalachian Biodiversity Project
Audubon of North Carolina • SouthWings**

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

March 30, 2006

Dear Chief Bosworth,

We are writing to you concerning the future of North Carolina's last wild forests and the benefits these last roadless forests provide to the citizens of North Carolina 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 not 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."

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 until the

Forest Service has completed and adopted a final rulemaking to establish protective management direction for these areas in North Carolina's National Forests.

In the 2005 Final Rule, 36 C.F.R. § 294.12-294.14, the Department of Agriculture asked each state to review and present recommendations on the management of existing Forest Service roadless areas. North Carolina's Governor Easley filed his petition on March 9, 2006 in response – seeking protection for all inventoried areas consistent with the 2001 Roadless Rule. Given this, it would be inappropriate for the Forest Service to approve or conduct projects in Inventoried Roadless Areas or to restrict the boundaries of those areas until the Forest Service finalizes a protective rulemaking for North Carolina's National Forests.

The roadless areas of our national forests provide North Carolina'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. 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 while the state is reviewing its options for the conservation of these areas per the request of the Department of Agriculture.

We look forward to your response.

Respectfully,

Southern Appalachian Forest Coalition
46 Haywood Street, Suite 323
Asheville, NC 28801

Southern Environmental Law Center

Western North Carolina Alliance

Southern Appalachian Biodiversity Project

Audubon of North Carolina

SouthWings