

Friends of the Columbia Gorge * Friends of Elk River * Friends of Mt. Hood * Headwaters * Hells Canyon Preservation Council * Klamath-Siskiyou Wildlands Center * McKenzie Guardians * Oregon Natural Desert Association * Oregon Natural Resources Council * Oregon State Public Interest Research Group (OSPIRG) Portland Audubon Society * Sierra Club * Siskiyou Project * Soda Mountain Wilderness Council * Umpqua Watersheds

March 30, 2006

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

Dear Chief Bosworth,

On behalf of the tens of thousands of members that collectively make up our Oregon membership, we write to you today to express our concern over development projects that threaten the roadless qualities of National Forest System roadless areas in the state of Oregon. Until a roadless area conservation policy for these lands is adopted, and until on-going litigation against the 2005 Roadless Repeal rule is settled, we hereby request that an immediate moratorium be enacted on logging and other development within roadless areas, including any current and proposed projects.

As you are aware, the US Department of Agriculture announced the Roadless Repeal rule on May 5, 2005, which requires 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. The new rule, which replaces the 2001 Roadless Area Conservation Rule, allows for mining, logging, and other development within National Forest System roadless areas.

According to this new Roadless Repeal 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 Department of Agriculture Secretary Mike Johanns, 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.”

To ensure that no actions are taken which might preclude a full range of options for protection of these areas, we write to request that the Forest Service agree to avoid proposing projects in inventoried roadless areas that would alter the roadless qualities of the areas, and to halt and withdraw all such projects under development.

The importance of Oregon's roadless forests cannot be overstated. Unspoiled roadless forests in Oregon provide hundreds of thousands of people with clean and reliable drinking water. The city of Bend's water supply, for example, comes entirely from an area called the Bend Watershed Roadless Area. Logging in the roadless areas that provide Oregonians with drinking water would be costly, and as Governor Kulongoski notes, "is likely to erode water quality in the State of Oregon."

Oregon's roadless forests also provide habitat to a diversity of wildlife, including several different species listed as threatened and endangered. By the US Forest Service's own assessment, development in roadless areas would adversely affect a number of threatened and endangered species including the bald eagle, the brown pelican, and several ESUs of fishes, including coho and chinook salmon, steelhead, and bull trout. Roadless forests are important habitat because they provide large contiguous parcels of wildlands where animals can seek refuge and forage without the distractions and threats from vehicles, clear cutting, and other harmful activities.

At the same time, roadless areas are an important engine for Oregon's outdoor recreation and tourism industries. Each year, millions visit Oregon's national forests to view wildlife, hike, camp, fish, hunt, mountain bike, kayak, and more. Oregon's roadless backcountry is enjoyed for its outstanding scenery, solitude, trails, and ideal areas for hunting and fishing, and through money spent on travel, lodging, equipment, guides, and food it adds millions of dollars to the state's economy and is a long-term and diverse revenue source for rural communities.

It should be noted that Oregonians strongly support protecting roadless forests. For example, during the 13-month official review and public comment period that preceded the adoption of the 2001 Roadless Area Conservation Rule, 79,676 Oregonians submitted official comments, the highest per capita rate in the nation. During the 4-month comment period for the 2004 proposal for new Roadless Repeal rule, over 55,000 Oregonians submitted comments. In both circumstances, the overwhelming majority favored complete protections for all roadless forests.

Additionally, Oregon's governor has been a strong proponent of safeguarding unspoiled roadless lands. On October 14, 2005, the Governor petitioned you, Secretary of Agriculture Mike Johanns, and Under Secretary of Natural Resources and Environment Mark Rey to reinstate the 2001 Roadless Rule so Oregon could quickly and efficiently resume protection on all inventoried roadless areas. Oregon is also one of four states challenging the repeal of the 2001 Roadless Rule in court.

Lastly, it should be noted that on February 28th, 2006, more than 260,000 American's petitioned the Department of Agriculture pursuant to the Administrative Procedures Act (APA) to reinstate the 2001 Roadless Rule. The APA petition requires a prompt determination by the agency, which is still outstanding.

Given the overwhelming and recent support for roadless forest protection by Oregonians, the actions of Oregon's Governor to reinstate the 2001 Roadless Rule and reapply complete protections for all inventoried roadless areas, and in light of on-going litigation and the submission of an APA petition by more than 260,000 Americans, it would also seem inappropriate for the Forest Service to approve or conduct projects in inventoried roadless areas or to restrict the boundaries of those areas until the disposition of these areas has been resolved.

Considering the value of wildlife, clean drinking water, tourism, recreation, and Oregon's quality of life, decisions regarding the management of roadless forests 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,

Oregon Natural Resources Council
5825 North Greeley
Portland, OR 97217

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Attachment

By our calculation, the Forest Service is currently proposing at least four commercial projects in inventoried roadless areas in the state of Oregon, mainly in southwestern Oregon. If all these projects were approved as proposed, a significant amount of Oregon's inventoried roadless areas (about 20,000 acres) would be degraded or lost. Perhaps of greater concern is what projects may be proposed in the time between now and when a final rulemaking is issued regarding management of Oregon's roadless forests.

As detailed in the preceding letter, we hereby request that any current and future projects that could be introduced before a final rulemaking is issued, which would alter the roadless qualities of inventoried roadless areas in the State of Oregon, be halted and withdrawn.