



THEODORE R. KULONGOSKI  
Governor

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Content Analysis Team - Roadless State Petitions  
USDA Forest Service  
PO Box 221090  
Salt Lake City, UT 84122

Dear Content Analysis Team:

Thank you for the opportunity to comment on the proposed revision to the 2001 Roadless Area Conservation Rule. After decades of debate, I thought we had resolution of this issue. Unfortunately, I was wrong. What was once clear, today has become unclear.

Roadless, undeveloped areas on National Forests benefit our citizens with a wide array of ecological services and benefits. They provide clean air and water, wildlife habitat, and recreational opportunities often not found on other land ownerships. There are 1,965,000 acres of inventoried roadless lands on public lands in Oregon that are entrusted to the stewardship of the U.S. Forest Service. Considering over 30 years of intense public debate over management of roadless areas including controversy over Roadless Area Review and Evaluation, several roadless lawsuits, and the fact that more than 2 million people commented on the 2001 rule, it is clear that the future of roadless areas of the National Forest System, both inventoried and uninventoried, is a debate that will not end.

Because of the current unsatisfactory implementation of federal forest land use allocation, including roadless areas, I continue to believe that commercial entry into the IRA's will break up the integrity of the forest ecosystem of large contiguous roadless areas, which in turn, will lead to severe environmental damage to these sensitive areas.

While the federal forests belong to all Americans, the State of Oregon would like a larger role in national forest planning for the 16 million acres of national forest land located within our borders. Greater state involvement in forest planning, including federal forest land use allocation, can help federal land managers to better understand the potential environmental, economic, and community effects of proposed management actions. However, there is no guarantee the Secretary of Agriculture will accept any state petition. It

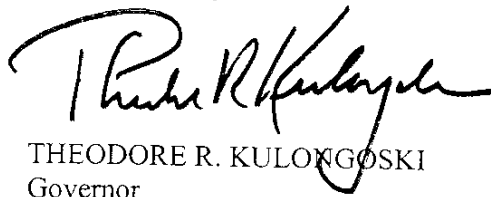
is inconsistent to shift the difficult work of roadless area designation from the Forest Service to states when the states do not have the authority to see that decisions are implemented. Asking Oregon to create yet another planning process for federal lands without any real management responsibility or budget control is simply an unproductive use of the state's time, energy and resources.

The public has vigorously debated the management of national forests for the past few decades while the lands continue to be governed by a collection of decades-old, uncoordinated statutes that do not reflect modern science or current social values. I believe the future of roadless areas is part of a much bigger debate on the role of national forests in the 21<sup>st</sup> century. Ultimately, the appropriate forum for that debate is the U.S. Congress. In support of the critical changes that need to be evaluated by Congress, I believe that the State of Oregon should be articulating a much clearer vision of how federal lands fit within the sustainability of our forested landscape and then work with our delegation to realize that vision. This I believe will be a much more productive use of our energies, rather than allowing issues to be resolved by piecemeal administrative rulemaking susceptible to changes in White House administrations.

If the federal government is unable or unwilling to address a comprehensive resolution of the management of all federally managed forest lands in Oregon, Oregon is opposed to the proposed revision to the 2001 Roadless Area Conservation Rule.

Thank you again for the opportunity to comment on this important issue.

Yours very truly,



THEODORE R. KULONGOSKI  
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