

**Pew Environment Group ♦ The Wilderness Society ♦ Earthjustice
Clean Water Action ♦ Environment America ♦ Greenpeace ♦ Defenders of Wildlife
National Wildlife Federation ♦ League of Conservation Voters
Natural Resources Defense Council ♦ Sierra Club**

March 31, 2008

Gail Kimbell
Chief, Forest Service
USDA
Sidney R. Yates Federal Building
1400 Independence Ave., SW
Mail stop 1144, Room 4NW
Washington, D.C. 20250-0003

Mark Rey
Undersecretary for Natural Resources & Environment
USDA
1400 Independence Avenue, SW
Room 217 E, Whitten Building
Washington, DC 20250

c/o Roadless Area Conservation-Idaho
P.O. Box 162909,
Sacramento, CA 95816-2909
facsimile to 916-456-6724.

Dear Undersecretary Rey and Chief Kimbell:

Over the past several years, you have received correspondence from our respective organizations, on behalf of the millions of individuals whom we represent, urging the administration to abandon its efforts to repeal or weaken the 2001 Roadless Area Conservation Rule. We write again to express our grave concerns with proposed rulemakings that would remove current protections afforded to national forest roadless areas under the roadless rule.

Spanning 58.5 million acres in 38 states, America's national forest roadless areas contain much of our nation's last pristine forests. Roadless areas provide numerous environmental and social benefits and are an increasingly important part of our country's natural legacy as we defend against the loss of open space. These last tracts of unspoiled backcountry provide habitat for wildlife, headwaters to rivers, and unparalleled recreational opportunities for millions of Americans. Recent actions by the administration now threaten pristine forest lands of the National Forest System in Idaho, Colorado, and Alaska.

The administration has initiated a national rulemaking that will decide the fate of more than 9.3 million acres of roadless areas in Idaho's National Forests, including part of the Greater Yellowstone Ecosystem. Idaho's roadless backcountry makes up the core of America's last intact forest ecosystem outside of Alaska – the last place where all of the native plants, fish, and wildlife – from the smallest plant to the largest predator – can still be found. Many threatened and endangered species, such as salmon, steelhead, and bull trout rely on Idaho's roadless areas and the streams found there for spawning. It is critically important to protect these vital ecosystems by safeguarding these roadless areas from further disturbance from roadbuilding, mining and logging.

Among its many flawed elements, the proposal for Idaho allows for a dramatic increase in phosphate mining on forestland near Grand Teton and Yellowstone National Parks. Selenium contamination and the environmental damage caused by mining in Southeastern Idaho currently present a

threat to the area's irreplaceable fish and wildlife habitat and livestock. We are concerned about the impact of more phosphate mining on these sensitive lands.

The proposed Idaho roadless rule would also allow temporary and permanent roads in 5.9 million acres of pristine forests. The National Forests of Idaho already have over 34,000 miles of inventoried roads and the agency estimates a \$646 million backlog of needed maintenance for these existing roads. It is irresponsible for the administration to propose new roads when current funding is inadequate to meet the maintenance needs of existing ones.

Recent actions by the administration also threaten natural treasures within our National Forests in two other states. In Colorado, the administration plans to remove current protections that prevent development in prime recreation lands, wildlife habitat, and watersheds in the Rocky Mountains. Colorado's National Forest roadless areas would be placed at risk by the proposed plan to open them to increased road construction, logging, and other development, including oil and gas drilling, through a state specific rulemaking similar to Idaho's.

Lastly, in Alaska, the administration recently unveiled management plans to increase old-growth logging in pristine parts of the Tongass National Forest, the heart of the world's largest surviving temperate rain forest. Under the plan, about 2.3 million acres that are currently without roads could be open to logging, roadbuilding, and other development.

The wild areas in Idaho and Colorado are currently protected under the 2001 Roadless Area Conservation Rule, but the proposed rulemakings would remove these protections and open the door to mining, logging, and oil and gas drilling, as well as other development. We believe these rulemakings in Idaho and Colorado are unwise and unnecessary. We ask that the protections of the 2001 Roadless Area Conservation Rule remain in place for these and all national forest roadless areas.

America's national forest roadless areas are a unique natural treasure, supporting outstanding ecological values and providing world-class recreation opportunities. Recent attempts to open pristine backcountry in Idaho, Colorado and Alaska to industrial development, underscore the need for reliable, nationally consistent protections for all of America's last roadless areas. The Roadless Area Conservation Rule provides these protections and should remain in place nationwide.

This landmark conservation policy provides balance and accommodates necessary fuels reduction, recreation, and emergency access while prohibiting the kind of new development in the backcountry — like road construction, industrial logging, mining, and oil and gas drilling — that would destroy the unique qualities of these wild places. We ask that you abandon these processes and instead uphold and enforce the Roadless Area Conservation Rule throughout the entire National Forest System in accordance with the wishes of the American people.

Sincerely,

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