

May 1, 2007

Gail Kimbell, Chief
Office of the Chief
4NW Sidney R. Yates Federal Building
201 14th Street, SW at Independence Ave., SW
Washington, DC 20250

Brad Gilbert, Idaho Roadless Interdisciplinary Team Leader
Roadless Area Conservation-Idaho
P.O. Box 162909
Sacramento, CA 95816-2909

Dear Chief Kimbell and Mr. Gilbert:

We write to request an extension of the comment period for scoping comments as presented in the Notice of Intent (NOI) to prepare an environmental impact statement for Roadless Area Conservation on National Forest System Lands in Idaho (72 Fed. Reg. 17816, April 10, 2007). We submit this letter on behalf of our hundreds of thousands of members throughout the country, who have repeatedly expressed their interest in protecting the last intact wild forests on our public lands.

The State of Idaho contains over 9.3 million acres of National Forest roadless areas –the most of any state outside of Alaska. The roadless National Forest lands of Idaho make up the heart of the Northern Rockies—the last great wilderness frontier in the lower 48 states. These roadless areas are of national and global significance. Idaho and the Northern Rockies are the last place in the lower 48 states where nearly all of the wildlife species that characterized the region before European settlement can still be found. The variety of landscapes represented by these roadless lands is unmatched by any other state outside of Alaska.

As such, these federally owned National Forest lands, and their management are of significance and importance to all Americans throughout the nation.

This rulemaking is intended to determine the management of over nine million acres of federal lands in Idaho. This is the first time that the proposal has been presented to the public for consideration and comment, and the first time that comments have been requested on a national level for a rulemaking specific to Idaho's roadless areas.¹

Given the national significance of Idaho's roadless areas, and the changes proposed in their management, the 30-day comment period is inadequate. The NOI for the proposed rulemaking calls for a 30-day comment period and no public hearings. This is half the time allotted for the comment period on the NOI for the 2001 Roadless Area Conservation Rule, which in addition to having a 60-day comment period also included 187 public meetings throughout the country.

Further, the State of Idaho itself has stressed the importance of allocating ample time for the public to comment. Even though the scoping comment period for the 2001 rule was twice the length of this proposed rulemaking, the State of Idaho argued that the process was invalid because it was rushed and did not allow enough time for public comment. In his request that the 60-day comment period be extended to 180 days, then-Governor Dirk Kempthorne, on behalf of the State of Idaho wrote:

“Your agency should not be trying to ramrod a decision that will shut down eight million acres of Idaho land into 'a short time frame.' You should be honoring the spirit - not to mention the clear mandate - of NEPA by providing meaningful opportunity for public participation and careful, principled, environmental analysis.”²

It should be noted that the Forest Service, in the April 10, 2007 NOI, specifically references "the denial of requests to lengthen the public review period" as part of the basis for this new rulemaking process. The new process, however, reduces the public comment period to half that of the process it purports to improve upon, and has no public hearings, compared to 187 for the 2001 roadless rule.

We therefore request that the comment period be extended to 90 days, or be reissued with a 60-day comment period from the time of reissue. We further request that the Forest Service conduct public hearings at this stage of rulemaking at representative locations throughout the country.

Sincerely Yours,

Robert Vandermark
Heritage Forests Campaign
1200 18th St NW
Washington, DC 20036

Caitlin Hills
American Lands Alliance
726 7th Street SE
Washington, DC 20003

Kevin Curtis
National Environmental Trust
1201 18th St NW
Washington, DC 20037

Amy Mall
Natural Resources Defense Council
1200 New York Ave., NW, Suite 400,
Washington, DC 20005

Sean Cosgrove
Sierra Club
408 C St., N.E.
Washington, DC 20002

Anna Aurilio
US Public Interest Research Group
218 D Street SE
Washington, DC 20003

Bob Witzeman
Maricopa Audubon Society
4619 E. Arcadia Lane
Phoenix, AZ 85018

Michael Painter
Californians for Western Wilderness
P.O. Box 210474
San Francisco, CA 94121

Kent Stromsmoe
Forestry Monitoring Project
2215 Pine Street
Martinez, CA 94553

Paul Hughes
Forests Forever
50 First St., #401
San Francisco, CA 94105

Mike Leahy
Defenders of Wildlife
1130 17th Street, NW
Washington, DC 20036

Lynne Stone
boulder-White Clouds Council
Box 6313
Ketchum, ID 83340

Gary Macfarlane
Friends of the Clearwater
PO Box 9241
Moscow, ID 83843

Gene Eatman
Friends of the Lolo Trail
4160 Four Mile Road
Weippe, ID 83553

Marv Hoyt
Greater Yellowstone Coalition
162 North Woodruff Avenue
Idaho Falls, ID 83401

Jonathan Oppenheimer
Idaho Conservation League
PO Box 844
Boise, ID 83701

Craig Gherke
The Wilderness Society
350 N. 9th St. Suite 302
Boise, ID 83702

Sally Ferguson
Winter Wildlands Alliance
910 Main Street Suite 235
Boise, ID 83702

Jim Bensman
Heartwood
PO Box 1011
Alton, IL 62002

Mark Donham
Regional Association of Concerned
Environmentalists
RR # 1, Box 308
Brookport, IL 62910

Doug Cornett
Northwoods Wilderness Recovery
P.O. Box 122
Marquette, MI 49855

Larry Campbell
Friends of the Bitterroot
Box 442
Hamilton, MT 59840

Matthew Koehler
WildWest Institute
P.O. Box 7998
Missoula, MT 59807

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

Bryan Bird
Forest Guardians
312 Montezuma
Santa Fe, NM 87501

Nathan Newcomer
New Mexico Wilderness Alliance
142 Truman St. Suite B1
Albuquerque, NM 87108

Emily Platt
Gifford Pinchot Task Force
917 SW Oak St.
Portland, OR 97205

Steve Pedery
Oregon Wild
5825 North Greeley
Portland, OR 97217

Francis Eatherington
Umpqua Watersheds
P.O. Box 101
Roseburg, OR 97470

Scott Groene
Southern Utah Wilderness Alliance
425 East 100 South
Salt Lake City, UT 84111

William McCarvill
Wasatch Mountain Club
3607 Golden Hills Ave
Salt Lake City, UT 84121

David W. Carr, Jr
Southern Environmental Law Center
201 W. Main Street, Suite 14
Charlottesville, VA 22902

Steve Brooks
Virginia Forest Watch
1097 Old Quarry Dr.
Nickelsville, VA 24271

Jim Northup
Forest Watch
PO Box 188
Richmond, VT 05477

Mike Petersen
Lands Council
423 W. 1st Ave, Suite 240
Spokane, WA 99201

Jonathan Ratner
Western Watershed Project
PO Box 1160
Pinedale, WY 82941

Bonnie Phillips
Olympic Forest Coalition
606 Lilly Road NE #115
Olympia, WA 98506

CC: Roadless Area Advisory Committee

¹ While the State of Idaho did accept comments during the development of the Idaho Petition, public outreach was limited within Idaho and non-existent outside of Idaho. Comments from outside Idaho counties containing roadless areas were discounted, and written comments were assessed by an industry group with proven conflicts of interest.

² December 3, 1999 letter from Gov. Dirk Kempthorne to Forest Service Chief Michael Dombeck.