

June 27, 2019

The Honorable Vicki Christiansen
Chief
Forest Service
U.S. Department of Agriculture
1400 Independence Avenue, SW
Washington, D.C. 20250

Dear Chief Christiansen:

We write today to discuss Forest Plan revisions taking place in Idaho, in both the Northern and Intermountain Regions of the Forest Service. We understand the need to update land management plans but want to be certain these, and future plan revisions, appropriately addresses the Idaho Roadless Rule (36 CFR 294 Subpart C).

As you know, the Idaho Roadless Rule is unique to our great state. The Rule was created through a collaborative process with a diverse group of stakeholders, has withstood legal challenges, and has successfully guided management of roadless areas in Idaho for over a decade. It is the principal governing document over roadless area management in Idaho, and any proposed land management plans must either align with the Rule or postpone implementation until the Rule can be amended before taking effect.

This is not a new conversation between the State of Idaho and the Forest Service. As a result of Forest Plan revision efforts in 2012, Governor Otter expressed concern over discrepancies between proposed Forest Plan revisions and the Idaho Roadless Rule to the Northern and Intermountain Regional Foresters. Their response, which is included for your review, provides guidance for then-current and future revision processes.

Their response states, “the provisions in the Idaho Roadless Rule (36 CFR 294 Subpart C) shall take precedence over any inconsistent land management plan component unless and until the rule is amended.” It goes on to limit circumstances where plan alternatives could contradict the Rule and states that if the chosen alternative was inconsistent with the Rule, the Record of Decision would need to note that the conflicting provisions would not be implemented until the Rule could be modified.

We appreciate that management circumstances change. The ability to adapt to unique features of Idaho’s landscape is key to what has made the Idaho Roadless Rule successful. As plan alternatives are developed and future plan revisions considered, we request that the guiding principles presented in the June 2012 letter are honored and the Regional Guidance document (F-12 Titled—Considering Wilderness Recommendations in Idaho Roadless Themes, dated March 2019) be updated to reflect these principles. There is a clear process for Rule corrections and modifications, when appropriate, but unless that process takes place, the Idaho Roadless Rule takes precedence over all other land management plans in Idaho.

We encourage you and your staff to coordinate closely with the Idaho Governor’s Roadless Rule Implementation Commission and promptly attend to this matter.

Sincerely,



Brad Little
Governor of Idaho



James E. Risch
United States Senator



Mike Simpson
Member of Congress



Mike Crapo
United States Senator



Russ Fulcher
Member of Congress

cc:

Ms. Leanne Marten, Regional Forester, Northern Region
Ms. Nora Rasure, Regional Forester, Intermountain Region

Enclosures:

Northern and Intermountain Regional Forester letter to Governor Otter, dated June 18, 2012
Idaho Roadless Rule and Forest Plan Revisions, Guiding Principles
F-12 Titled—Considering Wilderness Recommendations in Idaho Roadless Themes, dated
March 2019