

January 24, 2005

Mr. Jack Blackwell
Regional U.S. Forester
1323 Club Drive
Vallejo, CA 94592

Dear Regional Forester Blackwell,

The State of California has a keen interest in the management of all National Forest System lands—regardless of designation—under the stewardship of Region Five of the USDA Forest Service (USFS.)

We note that the USFS Interim Directive 1920-2004-1, that provides guidance for addressing road and forest management activities in inventoried roadless areas, is set to expire January 2006. With the changes listed below, we believe this Interim Directive provides an appropriate level of protection for our inventoried roadless areas (IRAs). The purpose of this letter is to request that the USFS promulgate a rule that provides at least the same level of protection as the Interim Directive with the changes listed below for existing IRAs in California before the Interim Directive expires.

The Region 5 Roadless Areas should be governed by the following principles:

- The USFS Chief should have no greater discretion than the Regional Forester or Forest Supervisor in approving or disapproving road construction or reconstruction in inventoried roadless areas.
- Maps of IRAs need to be updated and shared with the State to confirm that the maps accurately reflect current conditions.
- Where roads exist in IRAs, we must conduct thoughtful, common sense-based reviews of whether these roads should be actively managed or decommissioned. For example, roads that provide access for Native American Tribes to widely acknowledged sacred sites or meet legitimate public safety objectives or well-managed recreational use should be actively managed. Roads that cannot be managed to mitigate sedimentation in sensitive watersheds should be decommissioned.
- Roadless status limitations should not compromise our fire fighting efforts consistent with existing authority.

We believe that California's interests are best served when truly roadless areas remain roadless. However, unlike wilderness areas, a multitude of activities like those mentioned above are allowed in roadless areas so long as new roads are not created for such activities.

The State of California looks forward to working with you to address this important issue.

Sincerely,



MIKE CHRISMAN
Secretary for Resources

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