



March 15, 2006

Bernard Weingardt, Regional Forester
Pacific Southwest Region
UNITED STATES FOREST SERVICE
1323 Club Drive
Vallejo, CA 94592

Re: **Southern California Forest Plans**

Dear Regional Forester Weingardt:

Thank you for your recent decision to withdraw Land Management Plans for the Angeles, Cleveland, Los Padres and San Bernardino national forests in Southern California. Regardless of the issues in question, we appreciate the difficulty of making such a decision and believe that the public will benefit as a result.

We understand that your staff is addressing technical issues so that the four land use management plans can be published in the near future. Prior to your re-issuing the Records of Decision on the Southern California Forests Plans, the Resources Agency requests that you address our concerns regarding certain land designations in the four plans.

As you will recall, on January 24, 2005, I wrote to Regional Forester Jack Blackwell regarding the protection of all National Forest System lands in California (copy attached). This letter requested that the USDA Forest Service (USFS) promulgate a rule that provided at least the same level of protection as the Interim Directive 1920-2004-1, with four specified modifications, including that roadless status limitations should not compromise our fire fighting efforts consistent with existing authority.

In response to my letter, on January 27, 2005, the Regional Forester provided assurances to the state that USFS would respect the protections of the Interim Directive and the four modifications we had specified so that truly roadless areas would remain roadless (copy attached). In light of the Regional Forester's commitment to keep truly roadless areas roadless, we were concerned that the Land Management Plans for the four Southern California forests appeared to designate hundreds of thousands of Inventoried Roadless Areas as being suitable for road construction.

Specifically, the Land Management Plans allocate 253,584 acres of Inventoried Roadless Areas to a "Back Country" land-use zoning designation, 245,209 acres of Inventoried Roadless Areas to a "Back Country Motorized Use Restricted" designation and 38,511 acres of Inventoried Roadless Areas to a "Developed Area Interface" designation. (See Final EIS, Vol. I, Table 548, ch. 2, p. 66.) The "Back Country" and "Developed Area Interface" designations allow any and all "road construction or re-construction" while the "Back Country Motorized Use Restricted" designation allows for "road construction or re-construction" for authorized uses.

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Mr. Weingardt
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(See Land Management Plan Part 2, Angeles National Forest Strategy Table 2.1.3; Land Management Plan Part 2, Cleveland National Forest Strategy, Table 2.2.3; Land Management Plan Part 2, Los Padres National Forest Strategy Table 2.3.3; and, Land Management Plan Part 2, San Bernardino National Forest Strategy Table 2.4.3.)

USFS planning staff has informed us that both official and unofficial national forest system routes may be present in these Inventoried Roadless Areas designated "Back Country," "Back Country Motorized Use Restricted," and "Developed Area Interface." We understand that individual national forests are undertaking a route designation process designed to identify the locations of all routes—official and unofficial--on national forest system lands. The USFS is waiting to complete this route designation process until the four Southern California Land Management Plans have been finalized. USFS staff has also informed us that they are considering various projects in the Inventoried Roadless Areas that may require roads, although these projects are not discussed in the land management plans. At the time the public and the decisionmaker were considering the proposed Land Management Plans, they did not have updated route designation information identifying the location of official and unofficial roads in the Inventoried Roadless Areas. Moreover, in considering its land designations in IRAs, the USFS was aware that possible future projects would require roads in the IRAs. This information, which may have affected the USFS's decisions on land designations, was not available to the public. The absence of this data made it difficult for the public and the decisionmaker to evaluate all aspects of the proposed Land Management Plans and their potential environmental impacts.

In light of the information currently available, we are concerned that the four Southern California Land Management Plans do not protect Inventoried Roadless Areas as required by the commitments in your January 27, 2005 letter. Any such failure to protect the Inventoried Roadless Areas would be contrary to federal policy to conserve roadless areas and to provide appropriate deference to state concerns with respect to roadless areas. See Final Rule re State Petitions for Inventoried Roadless Area Management, 70 Fed. Reg. 25653 (May 13, 2005).

Accordingly, we request that the USDA Forest Service take immediate steps to ensure that all Inventoried Roadless Areas are protected in the manner set forth in your January 27, 2005 letter.

Thank you for your immediate attention and consideration of this letter.

Sincerely,



Mike Chrisman, Secretary
CALIFORNIA RESOURCES AGENCY

cc: Judy Noiron, Forest Supervisor
Angeles National Forest
701 N. Santa Anita Avenue
Arcadia, CA 91006

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Cleveland National Forest
10845 Rancho Bernardo Rd., Suite 200
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Gloria Brown, Forest Supervisor
Los Padres National Forest
6755 Hollister Avenue, Suite 150
Goleta, CA 93117

Forest Supervisor
San Bernardino National Forest
1824 S. Commercenter Circle
San Bernardino, CA 92408

Southern California Forest Plan Revisions
USDA FOREST SERVICE CONTENT ANALYSIS CENTER
P.O. Box 22777
Salt Lake City, UT 84122



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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File Code: 1900

Date: January 27, 2005

Mr. Michael Chrisman
Secretary
CA Resources Agency
1416 Ninth Street - Suite 1311
Sacramento, CA 95814

Dear Secretary Chrisman:

Thank you for your letter of January 24, 2005, concerning the management of Inventoried Roadless Areas in the national forests in California. I share your view that California's interests are best served when truly roadless areas remain roadless consistent with the need to avoid compromising our firefighting efforts.

You are correct that Forest Service Interim Directive 1920-2004-1 will expire in January 2006. It is our expectation that the Forest Service will complete a new roadless rule prior to that date. Future roadless protection will be determined by the forthcoming rule.

With respect to the four changes you request for interim roadless protection, we can agree with each.

The Interim Directive does grant the Chief of the Forest Service broader discretion than Regional Foresters to approve road construction in Inventoried Roadless Areas. To date, the Chief has not approved any road construction in roadless areas in California under the terms of the Interim Directive. There are no plans to do so. By this letter, you can assume that will remain the Agency's policy for California pending the completion of a final roadless rule.

We will provide you updated maps of the Inventoried Roadless Areas as they are completed. We concur with the need to provide appropriate access for: 1) Native American sacred sites; 2) legitimate public safety objects; 3) well-managed recreational use; and 4) firefighting efforts. We look forward to continuing to work with the state in decommissioning Forest Service roads that are negatively affecting sensitive watersheds.

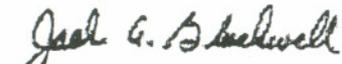


Secretary Michael Chrisman

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Finally, as we complete work on a final roadless rule, we look forward to developing a regulation that fully protects roadless values at least as successfully as the Interim Directive and in a fashion that meets the State's goals for the protection of wild areas in California.

Sincerely,


JACK A. BLACKWELL
Regional Forester