



JAMES E. RISCH  
GOVERNOR

October 5, 2006

The Honorable Mike Johanns  
Secretary of Agriculture  
U.S. Department of Agriculture  
1400 Independence Ave., SW  
Washington, D.C. 20250

**RE: Initiate Rulemaking to Establish New Management Provisions for Idaho's Inventoried Roadless Areas**

Dear Secretary Johanns:

As the Governor of Idaho, I am petitioning the United States Department of Agriculture to engage with the State in rulemaking to establish new management provisions for Idaho's 275 inventoried roadless areas consistent with the recommendations in the *Petition of Governor James E. Risch for Roadless Area Management in Idaho*, dated October 5, 2006. I request this action pursuant to 5 U.S.C. §553(e), which states:

Each agency shall give an interested person the right to petition for the issuance, amendment, or repeal of a rule.

This request is also made pursuant to 7 C.F.R. §1.28, which states:

Petitions by interested persons in accordance with 5 U.S.C. 553(e) for the issuance, amendment or repeal of a rule may be filed with the official that issued or is authorized to issue the rule. All such petitions will be given prompt consideration and petitioners will be notified promptly of the disposition made of their petitions.

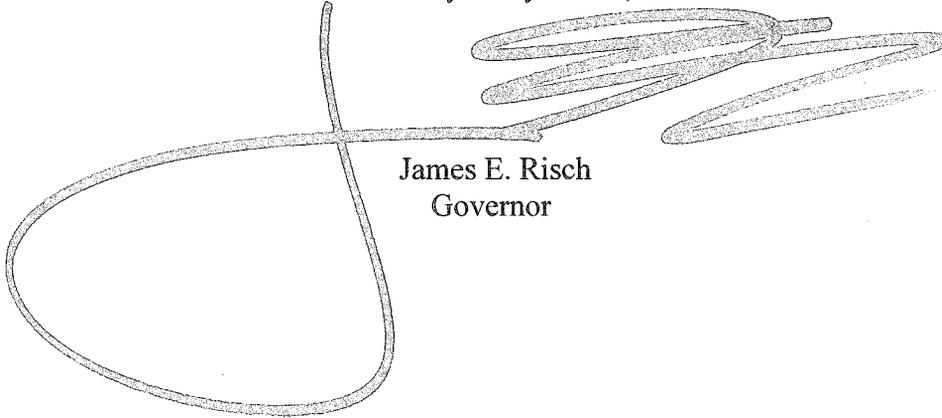
Furthermore, this petition is made under any additional federal laws, rules or regulations that empower the Department to begin a rulemaking process.

I realize the current process as established under the 2005 State Petition Rule is being forestalled by litigation in federal district court. The issue of roadless area management, however, has been subject to litigation for decades and this trend will likely continue into the future. This does not mean that alternative processes for rule making, such as the Administrative Procedure Act, are any less viable to achieve the direction the people of Idaho have recommended for these unique areas.

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Attached for your consideration is a series of management recommendations for each inventoried roadless area in the State. I look forward to partnering with you to create a rule for the management of Idaho's inventoried roadless areas.

Very Truly Yours,

A large, stylized handwritten signature in black ink, consisting of several loops and a long horizontal stroke that extends to the left.

**James E. Risch**  
**Governor**