SKIP BRANDT, FIRST DISTRICT
KOOSKIA, IDAHO

TED LINDSLEY, SECOND DISTRICT
GRANGEVILLE, IDAHO

BRAD HIGGINS, THIRD DISTRICT
COTTONWOOD, IDAHO

Phone (208)983-2751 FAX (208)983-1428

320 West Main Street, Grangeville, ID 83530

BOARD OF IDAHO COUNTY COMMISSIONERS

September 29, 2026

Governor Brad Little
State Capitol
PO Box 83720
Boise, ID 83720

Subject: Idaho County Request to Initiate Development of an Idaho Roadless Rule Modification

Dear Governor Little:

The Idaho County Board of Commissioners is writing to notify you that Idaho County intends to request modification of the management classifications assigned to Idaho Roadless Areas within Idaho County, pursuant to 36 CFR 294.27(b). The reason for our request is compelling.

Idaho County encompasses approximately 5.5 million acres, of which approximately 4.5 million acres are federally managed. Within those federal lands:

- approximately 2.2 million acres are Congressionally Designated Wilderness;
- approximately 100,000 additional acres are Recommended Wilderness, administratively managed to maintain their wilderness character;
- 348 miles of designated Wild and Scenic Rivers, including river corridors outside Wilderness (111,360 acres within these corridors); and
- lands outside Wilderness and Wild and Scenic River corridors remain subject to stringent federal protections for visuals and ESA-listed fish and wildlife and their habitat, further constraining management across substantial portions of Idaho County.

On top of those restrictions, Idaho County contains another 1,727,241 acres (32% of the County) of Idaho Roadless Areas. **Yet only 75 of Idaho County's 1,727,241 roadless acres are classified as General Forest, Rangeland and Grassland, the least restrictive management theme under the Idaho Roadless Rule.** Approximately 4.1 million acres—roughly three-quarters of Idaho County's entire land base—are therefore Wilderness, Recommended Wilderness, Wild and Scenic River corridors, or Idaho Roadless Areas, before even accounting for ESA-listed fish and wildlife habitat, and other federal land-management requirements. The majority of the roadless areas in Idaho County are managed under the Backcountry Restoration Theme which does allow for tree removal under limited circumstances. However, as a practical matter, the

Forest Service rarely chooses to use the allowances and flexibility under the Rule. These restrictions severely hamper Idaho County and its citizens' ability to:

- protect communities from wildfire;
- provide safe ingress and egress to homes and infrastructure;
- recreate as allowed by Forest Service planning documents, intended by Congress, and desired by local residents and visitors alike;
- improve wildlife habitat to preserve local customs, culture and economics;
- provide sustainable timber harvest to improve forest conditions and contribute to our rural economy.

Acres by Roadless Area theme in Idaho County:

Idaho Roadless Rule Theme	Acres in Idaho County
General Forest, Rangeland and Grassland	75
Backcountry Restoration	1,082,961
Primitive	291,041
Wildland Recreation	239,317
Special Areas of Historic or Tribal Significance	48,581

By contrast, four southeastern Idaho counties with phosphate-mining areas have no Congressionally Designated Wilderness, Recommended Wilderness, or designated Wild and Scenic Rivers, yet received significant General Forest, Rangeland and Grassland acreage under the Idaho Roadless Rule. The four southeastern Idaho counties do have a small amount of Wilderness Study Area, however, it is very minor in comparison with the extent of the public lands in those counties. In addition, those counties have much less federal land and their economies are not beholden to federal actions and inactions.

Nearly eighteen years of implementation have demonstrated the practical consequences of this imbalance. Projects intended to reduce hazardous fuels, protect communities, improve ingress and egress, and improve forest health have been reduced, modified, or otherwise affected by the presence and management classifications of Idaho Roadless Areas. Whether intended by the Rule itself or not, the Forest Service has developed many "process papers" for how to plan, design and implement projects in Idaho Roadless. Those additional processes are onerous and result in many projects simply excluding Idaho Roadless Areas due to the planning and litigation challenges of working through the process. Some recent examples from the Idaho County portion of the Nez Perce-Clearwater National Forest where Idaho Roadless Areas affected the size, design, outcome and effectiveness include:

- Lowell Wildland Urban Interface Project
- Interface Fuels
- Johnson Bar Salvage
- Clear Creek Integrated Restoration Project

- Windy Shingle Fuels Reduction
- Center-Johnson
- Dixie-Comstock Community Protection Project
- Orogrande Community Protection Project
- Red-Seagle
- Tinker Bugs
- Hungry Ridge Integrated Restoration Project
- 2015 Roadside Salvage

Additionally, other past decisions and projects are currently being analyzed that may further demonstrate how the burdensome processes have impeded projects in Idaho County.

The concerns raised by Idaho County are consistent with those identified by yourself and Senator James Risch in your February 19, 2026 letter to Chief Schultz, which concluded that implementation of the Idaho Roadless Rule "has failed to reach its full potential" and called for greater use of the Rule's existing authorities to accomplish community-protection work. Idaho County believes that fully using existing authorities is important, but as summarized above, our experience also demonstrates the need to reconsider the management classifications themselves.

The Idaho Roadless Rule expressly provides a mechanism for doing so. Under **36 CFR 294.27(b)**, the Chief may modify the designations and management classifications established by the Rule based on "changed circumstances or public need." This modification would not require rulemaking and is fully consistent with the intent and expectations in the Idaho Roadless Rule.

Idaho County's request is to convert the 1,727,241 acres of Idaho Roadless Areas within Idaho County to the General Forest, Rangeland and Grassland theme. The lands would remain Idaho Roadless Areas; the requested modification would change their management classification to provide greater flexibility to properly manage them to meet Forest Service and County goals. Idaho County has plenty of "protected" land without the Roadless acres being under the more restrictive themes.

As we prepare the final request, we will work with other counties and National Forests in the event they have interest in petitioning for modifications as well. We also believe that Idaho County's request for modification can stand on its own since Idaho County already carries 18 percent of all the Idaho Roadless Area acreage in the entire state and an extraordinary share of Idaho's most restrictive federal land designations in Wilderness and Wild and Scenic River designations. After nearly eighteen years of experience under the Idaho Roadless Rule, **only 75 General Forest acres among 1.727 million roadless acres is an imbalance that deserves reconsideration.**

At this time, we request a point-of-contact on your staff to work with Idaho County and direct the Roadless Commission to assist as we prepare additional geographic, wildfire-risk, project, resource, public-need, or other information and analysis you may need to fully consider this requested modification under §294.27(b). Our intent is to submit the formal request for your

review by November 1, 2026. We look forward to working with you, the Roadless Commission, federal Congressional staff, other counties and the Forest Service as we prepare our formal request.

Sincerely,

R. Skipper Brandt, Chairman Ted Lindsley Brad Higgins

cc: Tom Schultz, Chief, USDA Forest Service
Senator James E. Risch
Senator Michael Crapo
Congressman Mike Simpson
Congressman Russ Fulcher
Idaho Roadless Rule Implementation Commission
Troy Heithacker, Regional Forester, Regions 1 and 2
Daniel McKeague, Acting Deputy Regional Forester, Northern Region
Jon Word, Forest Supervisor, Nez Perce-Clearwater National Forests

OFFICE OF GOVERNOR BRAD LITTLE
OFFICE OF U.S. SENATOR JAMES E. RISCH

October 26, 2026

Idaho County Board of Commissioners
320 West Main Street
Grangeville, Idaho 83530

Re: Proposed Idaho Roadless Rule Modification

Dear Commissioners:

Thank you for your letter to Governor Little regarding Idaho County's request to modify management themes under the Idaho Roadless Rule. County officials and residents know their communities best and experience the direct results of federal land management decisions on their resources and economy. We recognize your frustration with the U.S. Forest Service's efforts to reduce hazardous fuels and improve forest health, and your request for greater flexibility warrants serious consideration.

The Idaho Roadless Rule was developed by Idahoans to ensure local voices shape the management of these lands, particularly when addressing and reducing wildfire risk to our communities.

At its core, the Rule is intended to enable responsible management, not to provide an excuse for inaction. We share your concerns that the Forest Service has not made full and effective use of the existing tools available through the Rule and recognize you are seeking better implementation.

Your proposal would place approximately 1.7 million acres of Idaho Roadless Areas in Idaho County under the General Forest, Rangeland, and Grassland theme. A proposal of this magnitude requires careful consideration and coordination with the Idaho Roadless Rule Implementation Commission.

The Commission was created by Executive Order No. 2006-43, and its responsibilities are codified in Idaho Code § 67-826. Its charge is to coordinate with the U.S. Forest Service and advise on projects, plans, and policies within or affecting Idaho Roadless Areas, as defined in 36 C.F.R. § 294.21. This includes addressing community protection, forest health, and the federal agency's interpretation and implementation of the Idaho Roadless Rule.

We appreciate your request for the Commission's assistance, and we are committed to working with you on the county's proposed modification once you have secured its support. As you proceed through this process, we encourage you to compile and present very specific examples of necessary projects, community wildfire risk information, and other supporting analyses so the Commission can assess the benefits of a Backcountry Restoration theme change that aligns with the Rule's framework.

We stand ready to work with you and the Commission toward that goal. We appreciate your leadership on behalf of Idaho County and share your commitment to healthier forests, safer communities, and a strong rural economy.

Sincerely,



Brad Little
Governor of Idaho



James E. Risch
U.S. Senator