





April 26, 2018

The Honorable Sonny Perdue Secretary of Agriculture U.S. Department of Agriculture 1400 Independence Ave, S.W. Washington DC 20250

Dan Jiron
Acting Deputy Undersecretary for Natural Resources and Environment
U.S. Department of Agriculture
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Washington, DC 20250

Vicki Christiansen Interim Chief, USDA Forest Service 1400 Independence Ave, S.W. Washington, DC 20250 Chris French Associate Deputy Chief, USDA Forest Service 1400 Independence Ave, S.W. Washington, DC 20250

Dear Secretary Perdue, Deputy Undersecretary Jiron, Chief Christiansen and Deputy Chief French,

We are aware that you have either received correspondence pertaining to or are generally aware of the matter of future use of four specific backcountry airstrips within the Frank Church – River of No Return Wilderness (FC-RONRW). Our organizations have been involved for decades in management of wilderness areas in Idaho and would like to take this opportunity to share with you our perspective on this issue.

To begin with, it is unfortunate that the controversy over the Simonds, Vines Ranch, Dewey Moore and Mile Hi airstrips in the Big Creek drainage in the FC-RONRW has continued for so long. The U.S. Forest Service rightly concluded decades ago that these airstrips did not meet the minimum standards for Forest Service airstrips and were not in regular use at the time of passage of the Central Idaho Wilderness Act. Subsequent obfuscation and contradictory statements from various Payette National Forest supervisors over the years derailed the initial efforts to forthrightly deal with these airstrips. Efforts by the Forest Service over the past several years to accommodate "emergency use" of these airstrips has not resolved this matter and in fact has made the situation worse. The Forest Service should stand by its original determination that these airstrips were not in regular use at the time of wilderness designation and close them.

It is noteworthy in 1982, when the Forest Service planned to allow these four airstrips to revert to a natural state without physical action to make them usable, the State of Idaho Transportation Department, Division of Aeronautics and Public Transportation, agreed with Forest Service that the airstrips "... are not suitable for public use" and supported the Forest Service's plan, stating "(o)ur suggested course of action would be to let the strips revert back to a natural state, without any physical action to make them usable." That letter is attached.

It cannot logically be argued that the FC-RONRW is lacking in air access resources, given the multiple airstrips that would still be available even if these four airstrips on Big Creek were closed. Additionally, the use of airstrips in this wilderness has exceeded the traditional access occurring at the time of designation, no doubt far beyond what the authors of the Central Idaho Wilderness Act were trying to preserve. The current practices of multi-airplane rendezvous, practicing "touch and go" landings, airstrip "bagging" and overnight camping next to an airplane are a far cry from the occasional airstrip use to

facilitate backcountry access that was occurring when Ted Trueblood and others were championing wilderness designation.

It is inevitable that, just like the Forest Service was finally forced to confront burgeoning jet boat traffic in Hells Canyon after passage of that legislation, the Forest Service will someday have to confront the escalation of air traffic that is occurring in the FC-RONRW. The wilderness values of this landscape are at risk if not already degraded by the amount of unnecessary airstrip use that is occurring.

The FC-RONRW Management Plan established the Wilderness Desired Future Condition:

Preserving the <u>wilderness character</u> of the FC-RONRW is the overriding goal of the (Central Idaho Wilderness Act) legislation and management (emphasis added).

The Forest Service's manual on wilderness management states:

Manage the wilderness resource to ensure its <u>character</u> and values are dominant and enduring (emphasis added).

On a nearly daily basis it is the responsibility of the Forest Service to meet its public obligation to <u>ensure the preservation of the wilderness character</u> of the FC-RONRW. That mandate is the bar by which the managing agency must judge the competing uses of wilderness.

That bar has changed over time. It will continue to change. The Idaho of 2018 is not the Idaho of 1950, 1960, or 1970. The demands upon the FC-RONRW have evolved and indisputably increased over the past 70 years. In the face of that change the Forest Service must keep one goal front and center: the preservation of the wilderness character of the FC-RONRW.

The proposed action for the "Big Creek Four" airstrips is, frankly, one of the mildest actions the Forest Service could take to address the growth in air traffic in the FC-RORNW and the subsequent conflicts with wilderness users who should not have to be subjected to the level of air traffic noise associated with airstrips in the FC-RONRW.

In closing, we urge that the Forest Service implement its original plan to close these airstrips. This is the action determined decades ago to meet the intent of the Central Idaho Wilderness Act and today meet the intent of the management plan to preserve the wilderness character of the FC-RONRW.

Please keep our organizations informed on further developments in this matter.

Regards,

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福祉 10 一年

March 3, 1982

Earl F. Dobbs District Forest Ranger Payette National Forest Big Creek Ranger District McCall, ID 83638

Dear Mr. Dobbs:



We have reviewed your February 23, 1982 correspondence regarding Vines Ranch, Simonds, Moore Ranch, and Mile-Hi Airstrips.

We agree that these airstrips are not suitable for general public use.

It is our understanding that Vines Ranch is on the backcountry mail route. Any action regarding this airstrip should be coordinated with Ray Arnold at Cascade. We also assume that closing these strips would not create a hardship for any backcountry residents who might depend on them from a supply standpoint.

Our suggested course of action would be to let the strips revert back to a natural state, without any physical action to make them unusable.

In conjunction with this action, you could prohibit use except by prior permission or in an extreme emergency only situation. would be a combination of Alternatives 1 and 2.

Please let us know of any official action taken on these airports, so we can make the proper adjustments to our records.

Sincerely,

WORTHIE M. RAUSCHER Administrator

LARRY A. HIPPLER

Airport Development

LAH/vp

cc: Mike Tank - USFS - Ogden

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