



IDAHO TRANSPORTATION DEPARTMENT

Division of Aeronautics
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SEP 04 2014

Rick Brazell
Forest Supervisor
Nez Perce-Clearwater National Forests
903 3rd Street
Kamiah, ID 83536

Dear Rick,

The Division of Aeronautics welcomes the opportunity to provide comments on the proposed action for the revised Nez Perce-Clearwater National Forest Land Management Plan. We recognize the amount of effort that is going into this revision and we hope that the comments the Division provides will benefit the Nez Perce-Clearwater National Forests and the various aviation interests that utilize the seven public use airports that are located with their boundaries.

We were pleased to note that the public-use airport system was mentioned early on in the document. The introduction (Distinctive Roles and Contributions) specified that the airports "provide a distinct opportunity for access". We submit that this attribute is true for more than just recreational users.

The historic value of many of the airports, Moose Creek USFS (1U1) in particular, is well documented. Its shorter airstrip was considered as "contributing structure" on the nomination form for the Moose Creek Administrative Site in the National Register of Historic Places.

Access to "recreation settings" and for "land management and public needs and purpose of the Forest" (pages 46-47), are statements that underscore the importance of these seven airstrips. We feel the value of these airports to the recreating citizens and other users is commensurate with the road and trails systems. As such the State of Idaho would like to see airports/airstrips considered as part of the "entire forest development transportation facility" (Maintenance definition, Appendix A-Glossary). In that definition upkeep of roads, parking and traffic control devices are mentioned. Runway surfaces and approaches would seem a logical inclusion in our view.

Maintenance of the airstrips is acknowledged in Chapter 2, (Human Uses of the Forest - Access) with direction to meet standards identified in the individual airport management plans. Specific language similar to that related to the cutting of "hazard trees" (aviation hazard tree) included in the guidelines for "Eligible Wild and Scenic Rivers" (page 74) would provide clearer direction for District Rangers in the drafting and review of the individual airstrip maintenance plans. Paragraph FW-DC-REC-17 states that the airstrips are "not to expand in size but are maintained to historical site conditions to provide safe and functioning airstrips . . ." We would contend that many, if not all of the airstrips in the NP-CNF have had substantial tree growth adjacent to, and on the ends of the runways over the decades since their creation. This is borne out by an examination of historic aerial photographs of the airstrips.

At minimum, addition of more specific direction (pertaining to runway surface and approach maintenance) should be accomplished during the review and update of the airstrip management plans as is suggested in Appendix E (page 74), if determined too specific for the Forest Plan.

We realize that the "Plan" is a strategic document, that "provides general management guidance", but the Division of Aeronautics regards the runway surfaces and approaches to be on par, in terms of importance, with roads and trails. As such, more specific mention of these two airstrip attributes in the plan would give emphasis to the maintenance of both.

The Division of Aeronautics will continue to encourage the National Forests within the State of Idaho to address runway conditions and approach encroachment (as well as other less safety-critical airstrip issues) through our participation in the Idaho Airstrip Network.

Finally we did want to point out a typographical error on page 48. The reference to the Idaho Airstrip Network, which is the correct title of the organization, is incorrectly called the "Idaho Aeronautics Network".

All in all, this Forest Plan update is a good document, especially because it mentions airstrips and their need in greater detail than previously, I believe this is a testament to the cooperation provided by the United States Forest Services' participation in the Idaho Airstrip Network.

Sincerely,

A handwritten signature in dark ink, appearing to read "Mike Pape", with a stylized flourish extending to the right.

MIKE PAPE
Administrator
Idaho Division of Aeronautics