



Recreational Aviation Foundation

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Champe Green, Forest Planner
Cibola National Forest and National Grasslands
2113 Osuna Road NE
Albuquerque, NM 87113

Via email to comments-southwestern-cibola@fs.fed.us

RE: Cibola National Forest Plan Revision

Comments on the Needs for Change and Proposed Action Document, February 9, 2015

Dear Forest Planner Green,

On behalf of the Recreational Aviation Foundation (RAF) please accept the following comments and suggestions regarding the latest needs-for-change statement dated February 9th 2015.

We thank you for taking our considerations and comments into account from our letter submitted last year in response to the planning draft revision. We are encouraged to see recreational aviation mentioned in several places in the needs-for-change statement, such as page 28 line (e) and page 32, paragraph 4.

We believe that sufficient guidance has been issued to include recreational aviation as an integral part of each forest plan. Because all subsequent plans created on a National Forest are subservient to the Forest Plan, the RAF believes it is critical that the forest plan contain language addressing recreational aviation, thus creating the authority to include recreational aviation planning in future activities. Many examples of appropriate language concerning recreational aviation, airstrips, airfields, and similar subjects to consider for inclusion in the Cibola Forest Plan can be found by referring to the 2012 Planning Rule as well as the final Planning Directives, and searching on aviation, access by air, airstrips, etc.

Note also that the Cibola National Forest has long hosted aeronautical activities, including those at the recreational soaring site on Sandia Crest.

The Recreational Aviation Foundation recently entered into a Memorandum of Understanding (MOU) with the USFS and this MOU recognizes the following mutual benefits:

- *Airstrips are an important part of the administrative and recreational infrastructure on Forest Service lands.*
- *Use of these airstrips for recreational access is a valued and important activity for the aviation community and many visitors.*
- *Backcountry airstrips provide a low impact method of access to various remote and isolated recreation sites and areas.*
- *Some backcountry airstrips contain important historical and cultural values that are reminders of a bygone era.*
- *Backcountry airstrips provide potential access for emergency services, firefighting efforts, and other administrative activities of the Forest Service.*

Further, the FS and the RAF believe that collaboration between the recreational aviation community and the U.S. Forest Service is important and necessary to ensure that backcountry airstrips are recognized as valuable sources of recreation opportunities, that airstrips receive support from aviation volunteer groups for ongoing maintenance and operations, and that future needs for airstrip policy can be identified. This Memo of Understanding will facilitate and encourage further collaboration between the recreational aviation community and the Forest Service.

Here below are a few examples of specific needs which should be covered or expanded in the Needs for Change document, although many more may be needed as cited in our prior letter and the documents and MOU mentioned above.

P. 27 Add new leading paragraph as follows to define recreational opportunities per the Planning Rule directives:

D. Recreation

There is a need to define Recreation Opportunity as an opportunity to participate in a specific recreation activity in a particular recreation setting to enjoy desired recreation experiences and other benefits that accrue. Recreation opportunities include non-motorized, motorized, developed, and dispersed recreation on land, water, and in the air (36 CFR 219.19). 1909.12_zero_code Page 16

P. 28 Expand paragraph as follows:

e. There is a need for the revised plan to address recreational aviation activities and opportunities.

P. 29 change top paragraph to:

There is a need for plan direction that addresses the use of volunteers for dispersed and developed recreation maintenance and construction consistent with volunteer regulations. The plan should take into account existing Memoranda of Understanding between the Forest Service and recreational and special use groups. Management approach.

P. 38 consider the need to start the Infrastructure section with the definition of infrastructure need as provided in the Planning Rule Directive as follows:

F. Infrastructure

There is a need for the Interdisciplinary Team to identify and evaluate available information such as the location and condition of infrastructure within the plan area. The plan area's infrastructure includes the forest road system, recreational infrastructure (such as developed facilities, trails, resorts, and recreational residences), airstrips, administrative facilities, dams, water diversions, fences, communication towers, and bridges within the plan area. This information is for basic understanding of the role of infrastructure in the plan area, not to make evaluations about specific facilities.

P. 39 Add following paragraph to page [and/or could be located elsewhere as appropriate]

There is a need to acknowledge the long history of soaring from Sandia Crest and plan for other recreational aviation access and uses in the future.

SUMMARY

Future planning for transportation and access needs on USFS Lands is critical to the RAF mission of "Keeping the legacy of recreational aviation strong by preserving, maintaining, and creating public use recreational and backcountry airstrips nationwide ..." and **the references to aviation in the Planning Rule and Planning Directive clarify and solidify aviation as a legitimate mode of access, and one of the three legs of the National Forest Transportation System.** The final directives provide sufficient guidance to ensure that access by airplane be considered in forest plan development on both land and water. We are becoming familiar with the directive in order to provide appropriate input to FS planners during a Forest's revision process.

While the Planning Rule Directive may encourage Forest Service line officers to work with aviators on new or existing airstrips, congruent with their current Forest Plan, their primary value is in guiding Forest Plan revisions as they take place.

We thank you once again for considering recreational and back country aviation as a significant part of the Cibola National Forest plan and look forward to working with you in the future.

Sincerely Yours,



Rol Murrow, Member of the Board
Southwest Region Coordinator
Recreational Aviation Foundation