

Recreational Aviation Foundation

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November 5, 2021

Travis Moseley Responsible Official
Attention: Forest Plan Revision Team
Lincoln National Forest
3463 Las Palomas Road
Alamogordo, NM 88310
Via attached pdf to comment form at
https://cara.ecosystem-management.org/Public//CommentInput?Project=45148

RE: Lincoln National Forest Draft Land Management Plan Comments

Dear Forest Plan Revision Team,

On behalf of the Recreational Aviation Foundation (RAF) please accept the following additional comments regarding the development of a revised Land Management Plan for the Lincoln National Forest, including any new or possible future plans that may be considered.

This letter includes a specific request for added language.

We have written before in 2012 and I have attached that letter to our online form since it provides much more information about our organization and partners as well as relevant reference materials that may well be useful to you.

In short the RAF is a nonprofit 501 c 3 national organization representing thousands of backcountry and recreational pilots and airstrip supporters in all 50 states. The RAF has been working closely with the Aviation Division of the New Mexico Department of Transportation, the New Mexico Airstrip Network Committee, and the Recreational Aviation and Backcountry Committee of the New Mexico Pilots Association in studying the Forest Plan revision.

Recreational Aviation Defined: Recreational aviation can be broadly defined as the use of aircraft to provide access from the air to recreational opportunities such as camping, hiking, fishing, and all other similar recreational activities typically available to the public on public lands.

We believe that sufficient guidance has been issued in the national Planning Rule of 2012 and related documents to include recreational aviation as an integral part of each forest plan. The aircraft are typically light general aircraft ranging from Ultralights, Piper Cubs, and small Cessnas to other light aircraft typically used by General Aviation pilots. A new

generation of aircraft is coming that are powered electrically. Other aircraft might include gliders, balloons, and similar unpowered aircraft.

In reviewing the draft Land Management Plan and the draft Environmental Impact statements we are pleased that recreational aviation and associated facilities are mentioned in a number of places. The documents appear to maintain a flexible approach to planning in the future, focusing on statements of current and changing conditions, providing stated needs in broad terms, and avoiding setting many hard constraints on the ongoing planning process.

Our request: We request an addition to the section "Recreation and Scenic Character" on page 12 of the draft plan. This closely tracks the language of CFR 219.10 Multiple use. (b) (1) (i). Please add a third bulleted need statement as follows:

• There is a need for plan components, including standards or guidelines, to provide for sustainable recreation; including recreation settings, opportunities, and access; and scenic character. Recreation opportunities may include nonmotorized, motorized, developed, and dispersed recreation on land, water, and in the air.

Importance of including Recreational Aviation: 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 contains language addressing recreational aviation, thus creating the authority to include recreational aviation planning in future activities.

Please also review our original letter which is also attached to today's comment submission. And note that after it was written USFS Region 3 joined numerous other agencies and NGOs as a party to the MOU establishing the New Mexico Airstrip Network, similar in language and purpose to the Idaho Airstrip Network MOU and to the three national MOUs between the RAF and the USFS, BLM, and National Park Service.

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

Sincerely Yours,

Rol Murrow, Director Emeritus Recreational Aviation Foundation

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Attachment: Lincoln NF Plan RAF input Assessment FINAL 160229.pdf