



## Recreational Aviation Foundation

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Sabrina Flores, Forest Planner  
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Via email to [lnf\\_fpr\\_comments@fs.fed.us](mailto:lnf_fpr_comments@fs.fed.us)

RE: Lincoln National Forest Plan Revision Assessment Input

Dear Forest Planners Flores and Cole,

On behalf of the Recreational Aviation Foundation (RAF) please accept the following comments and suggestions regarding the development of a revised and updated Forest Plan for the Lincoln National Forest, including any new or possible future plans that may be considered. We will refer to the Lincoln National Forest in this document as “the Lincoln NF” or simply “the Forest.”

The Recreational Aviation Foundation 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 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. Other aircraft might include gliders, balloons, and similar unpowered aircraft.

**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. Many examples of appropriate language concerning recreational aviation, airstrips, airfields, and similar subjects to consider for inclusion in the Lincoln Forest Plan can be found by referring to the 2012 Planning Rule as well as the final Planning Directive, and searching them for terms such as aircraft, aviation, air access, airstrips, landing fields, etc. I provide some examples at the end of this letter.

Note also that the Lincoln National Forest has many superb recreational opportunities the use of which may be enhanced by permitting and encouraging access by air, either from within or outside the Forest itself. In addition there is some evidence that there may be places within the Forest that have been used in the past for landing aircraft, or possibly even in use now. This is a subject for further research, and a statewide survey of historical airstrips and other landing areas is currently under way.

**Purpose of these comments:** In essence our intent is to give the Forest planners clear and logical reasons for including recreational aviation, backcountry airstrips, and related topics in the revision as additional topics, and to provide a set of tools to ensure the future diversity of Forest access and uses. Such language should be considered mandated as it has been provided for all NFS forests in the 2012 USFS National Planning Rule, implementation documents, and other policy statements as discussed below.

Light recreational aircraft provide an alternative transportation method for travel from a visitor's home area to the national forests. Forest personnel no doubt have noticed a change in the transportation methods used by Forest visitors when visiting the Forests. The trend is for new access methods and recreational uses to increasingly supplement tent camping, hiking, fishing, and hunting. A trend has developed towards increasingly sophisticated RV's such as motor homes and camper trailers, along with new recreational activities involving ATV's, snowmobiles, mountain bikes, high end boats, and other motorized or nonmotorized equipment.

There are others who have long chosen aircraft as their method of accessing public lands including the national forests, since the earliest days of aviation, and in recent years this has increased because of the adoption of newer, light aircraft capable of operating into very small areas with minimal, or in many cases, no need for improved landing sites.

In terms of costs, these vehicles are often quite a bit less expensive than many RV's, boats, or other vehicles found in the Nation's Forests.

Blackwater airstrip in the Blackwater River State Forest in Florida, North Fox Island airstrip in Michigan, along with airstrips in National Forests such as Double Circle airstrip in Arizona, and Negrito airstrip in the Gila National Forest in New Mexico are all just a few examples of airstrips recently reopened or where public use has been encouraged on public lands, thus expanding and dispersing the recreational experiences of forest visitors. In addition, in Montana a brand new airstrip was recently built and opened at Russian Flat in the Lewis and Clark National Forest, largely with the help of volunteers from the RAF and the Montana Pilots Association.

**Discussion of Impacts:** Unlike almost all other motorized vehicles, aircraft do not have wheels driven by engine power and therefore are not capable of comparably disturbing

vegetation and contributing towards erosion like most other forms of transportation – even horses. A small area is used for landing, and then the aircraft is parked. No long road through a forest is necessary. Once the aircraft is on the ground most visitors simply enjoy typical light recreation activities such as hiking, tent camping, photography, and swimming. The large impacts caused by heavier recreational uses are not possible because of the limited hauling capacity of small aircraft.

Airstrips occupy ground with minimal slope, in large open areas, and if any construction is even needed are generally constructed of native materials, and over time become naturally vegetated. Except for possible airstrip markers or perhaps a wind sock, the airstrip is typically unnoticeable to other users or hikers, and even persons in vehicles unless they drive onto the strip.

In recreational aviation we have a saying about aviation access - it is “the only mode that needs no road!”

One consideration for enhancing airstrip availability could be the reopening of old or abandoned airstrips or the use of primitive road areas already in place. This would have the benefit of already having a footprint on the ground. Another consideration is to strategically locate a new airstrip to accomplish a dispersion objective by moving visitors to a desired location such as an underutilized area of a forest, thereby relieving congestion at some other point. Air campers like some recreation assets to be nearby, such as being close to a trail. Thus an airstrip can form an internal “aeronautical trail head” that needs no access road, in locations such as on a ridge with a scenic outlook, or in an area with wildlife to observe and photograph, to name a few.

**Relevant Examples:** Our ‘close to home’ examples to consider are in the Gila National Forest. Members of the RAF and the New Mexico Pilots Association have worked with the District Rangers in the Gila to maintain and establish use agreements for a number of airstrips in the area, including Negrito, Beaverhead, Jewett Mesa, and Me-own.

We have conducted work parties comprised of volunteer pilots from all over the region to assist with infrastructure maintenance, improvements, and backcountry aviation education.

These airstrips are truly an asset and add fantastic recreational value for the Gila National Forest and surrounding areas, and also contribute to the economy of the state of New Mexico, as we have seen in Idaho with the development of the Idaho Airstrip Network (IAN) and work by the RAF and other groups developing a robust system of rural and remote backcountry airstrips serving visitors from throughout the United States with low impact recreational opportunities.

**Benefits of Aviation and Airstrips for Others:** Note that such airfields also provide significant benefits for other users too, such as rapidly and economically transporting medical personnel and medical supplies in and injured visitors out of remote areas, providing access for scientists to conduct wildlife and other scientific studies, serving the Forest Service’s need for certain firefighting activities, providing emergency safe landing facilities for aircraft overflying large areas of forested and rough terrain, and allowing writers and photographers covering stories about our public lands easy access to remote areas, resulting in spectacular photo essays in such journals as National Geographic. The

conservation and environmental support group LightHawk also uses volunteer pilots and their aircraft to promote the natural values of our public lands and to transport scientists, media representatives, and public officials over and into our natural places as part of their mission.

Note also that nearby communities may benefit greatly from aviation access to the Forests. Such communities often have airfields of their own and can provide fuel, provisions, and other supplies to those utilizing aircraft to recreate in the Forests. This has been demonstrated in Idaho, where the network of airstrips on public and private lands has been shown to be a significant economic driver for the state and for communities which serve as departure points for flights into the Forests and other public lands there.

Finally, please be aware that there are more than 70 charitable public benefit flying organizations. At their own cost, volunteer pilots for these groups fly patients for care, deliver relief workers and supplies following disasters, conduct conservation and environmental support missions (as with LightHawk, mentioned above), and perform many other missions of service. In some cases volunteer pilots use their skills to transport special needs children and disabled persons of all ages, such as our wounded and recovering veterans, into remote areas so they too can enjoy the natural surroundings and solitude that would otherwise be inaccessible to them.

By placing reference to recreational and backcountry aviation and airfields in the revision the Forest will acquire a tool to be considered when a need arises to provide some "outside the box" opportunities. Since this plan will be in existence for a number of years, probably more years than the stated revision frequency, and since most of the existing staff will eventually move on to other jobs and forests, the plan will provide follow on Forest personnel with a set of tools that will ensure the continued success of the Lincoln National Forest.

**How to Implement These Recommendations:** At an absolute minimum statements should be inserted at appropriate places in recreation and infrastructure sections of the Forest Plan, and in the alternatives of the Environmental Impact Statement, such as: "Consideration for recreational aviation activities and access to airstrips and Forest Service lands for recreational purposes should be included in planning considerations for recreation and infrastructure."

As examples, staff can simply add the phrase "aviation access and airfields" to the list of infrastructure resources and modes of access wherever these topics are mentioned or may be appropriate in this revision of the Cibola Forest plan document. This phrase or one similar can be inserted wherever roads, trails, mountain bicycles, trailheads, parking areas, or other modes of access or recreational use are discussed. We would be happy to work with staff on recommending such insertions and discussions.

We have seen states like Idaho, Montana, and Alaska among others, embrace and promote aviation on public lands, including lands administered by the Forest Service. New Mexico has great potential considering the variety of terrain it offers, much of it in remote areas, and it would be a pity if this opportunity were to be lost or delayed because it was not considered as part of current or future planning phases for this Forest.

We realize that backcountry and recreational flying may be a foreign concept to many people. However, we have very experienced team members who can be consulted and who are willing to share information about the preservation, maintenance, and opening of airstrips on public lands. In addition the many volunteers from the national and state recreational aviation and backcountry flying organizations not only keep the airstrips clean and trash free, but also pitch in to maintain and administer many airstrips through agreements with the controlling entities.

For example the National Park Service has for some years been a party in a MOU with the Recreational Aviation Foundation (RAF) for the maintenance and operation of several airstrips in Death Valley National Monument, including Stovepipe Wells and the remotely located Chicken Strip adjacent to the Saline Valley Warm Springs.

### **Sources of Guidance for Forest Service Planning:**

Congress and the United States Forest Service have already provided significant direction to guide the various Forests in dealing with recreational aviation and airstrips. As just a few examples, please note the following excerpts from various documents relating to the matter:

**Guidance has come from Congress:** *"Back-country airstrips.—The Committee notes that backcountry airstrips are an appropriate use of certain National Forest System (NFS) lands that can provide enhanced access for a variety of legitimate activities.* (PAGE 92 112TH CONGRESS REPORT 1ST SESSION, HOUSE OF REPRESENTATIVES REPORT).

**Guidance from the House Committee on the Interior and Appropriations:** *The Committee directs the Forest Service to consult with Congress, State and local officials, and affected stakeholders prior to making a determination to close or terminate the use of any rural airstrips.*

**Guidance from the Chief of the Forest Service:** *"As Chief, I want line officers and resource planning staff to support use of recreational aircraft and backcountry airstrips on NFS lands where appropriate considering local resource conditions and as part of a balanced, safe, and efficient forest transportation system. It is our policy to develop aircraft landing facilities, including backcountry airstrips, on NFS lands consistent with the applicable land management plan and applicable Federal Aviation Administration regulations (49 U.S.C. 1349)."* (File Code: 1900123 0015 10015 3 00/5400/7700 Date: July 2, 2009)

**Guidance from the 2012 Planning Rule:** *"Sustainable recreation; including recreation settings, opportunities, and access; and scenic character. Recreation opportunities may include non-motorized, motorized, developed, and dispersed recreation on land, water, and in the air."* PAGE 21266 FEDERAL REGISTER / VOL. 77, NO. 68 / MONDAY, APRIL 9, 2012 / RULES AND REGULATIONS, 219.10.b (1) (i), UNDER MULTIPLE USE.

**The Preamble to the 2012 Rule states:** *"The rule recognizes and states in 219.10 and the definition in 219.19 that recreational opportunities include non-motorized, motorized, developed, and dispersed recreation on land, water, and air. Examples include activities such as hiking, biking, hunting, geocaching, recreational aviation, hang gliding and many more."*

**And further the Preamble states:** *"Responsible officials must also consider placement and management of infrastructure, including recreational facilities. It is appropriate to refer to such facilities as infrastructure because recreational facilities are fixed capital installations that enhance recreational experiences. These facilities include: campgrounds, roads, trails, backcountry airstrips, and drinking water and waste water."* PAGE 21222 FEDERAL REGISTER / VOL. 77, NO. 68 / MONDAY, APRIL 9, 2012 / RULES AND REGULATIONS.

**And lastly The Travel Management Rule states:** *Forest transportation system. The system of National Forest System roads, National Forest System trails, and airfields on National Forest System lands.*

### **Memorandum of Understanding: Forest Service and Recreational Aviation Foundation**

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 access to recreational opportunities 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.*

For all the above reasons and more, the Recreational Aviation Foundation believes sufficient guidance has been issued to mandate including recreational aviation as an integral and important part of any forest plan. Because all subsequent plans created on a National Forest are subservient to the 2012 National Forest Planning Rule, the RAF believes it is critical that this Forest Plan contains language addressing recreational aviation, thus enhancing or creating the authority to include recreational aviation planning in future activities in the Lincoln National Forest administered areas.

## **Examples of Topics Recommended for Inclusion in the Forest Plan**

Here below are a few specific examples of topics which should be covered in the Forest Plan, although many more may well be needed as cited in this letter and the documents and MOU mentioned above.

**Add** new paragraphs as follows to define recreational opportunities per the Planning Rule directives, plus additional language below for Access and Infrastructure:

### **Recreation:**

*The Plan should 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*

*The Plan should address recreational aviation activities and opportunities.*

*The Plan should support and address 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.*

### **Access:**

Wherever access to recreational opportunities is mentioned in the Plan, access by means of aviation, airstrips, and landing areas should be included along with access by means of roads, trails, waterways, and other facilities whether by users on foot, bicycles, ATV's, horseback, automobiles, RV's, and other means of transport.

The Plan should introduce its section on Infrastructure with a statement such as the following:

### **Infrastructure**

*The Interdisciplinary Team should 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.*

*There is a need to acknowledge the long history of aviation usage and airstrips in the Forest and to plan for other recreational aviation access and uses in the future.*

Wherever infrastructure facilities and capabilities are mentioned in the Plan such as campgrounds, hiking trails, picnic areas, parking lots, roadways, historical structures, and such, please make sure to include airfields, airstrips, landing areas whether formal or informal, and facilities and navigational aids appropriate to them such as tiedown areas, airfield camping areas, windsocks, and markings.

## **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.”

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 must be considered in forest plan development on both land and water. We have been 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 the aviation community on formal or informal landing areas including any existing or possible new airstrips, congruent with their current Forest Plan, the Directive’s 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 Lincoln National Forest plan and look forward to working with you in the future.

Sincerely Yours,



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