

Data Submitted (UTC 11): 2/5/2020 7:00:00 AM

First name: Mark

Last name: Spencer

Organization: Recreation Aviation Foundation

Title: Arizona State Liaison

Comments: Thanks for the note! I really appreciated the opportunity to get together with your team and other members of the public in Phoenix last week. I always learn something valuable at these engagements. My hat is certainly tipped to you and the team for all you do to help ensure the sustainability of our forests through careful planning! Thank you in advance for considering our suggestions. I have updated our suggestions, see attached and please use this revised document going forward, primarily the introduction, but also a correction in one section line number, and the additions discussed in at the Phoenix meeting, excerpted here for convenience: Management Approaches, Page 27: 06. Utilize collaborative partnerships where volunteers plan, lead, and execute a majority of motorized and non-motorized trail infrastructure maintenance. Also added to the attached regarding page 134 for the plan, : Guidelines (RWMA-G) Page 134: Management activities, including transplants (e.g., removal, reintroduction, or supplemental introduction) of wildlife species, should be permitted to use motorized and mechanical means (e.g., helicopter, shortfield aircraft landings) if necessary to perpetuate or recover a threatened or endangered species, to restore the population of an indigenous species, or to manage wildlife populations. Lastly, and per my original email. We remain concerned that Grapevine airstrip is not mentioned as a formal airstrip in the Draft Environmental Impact Statement Volume 1 page 229, along with Pleasant Valley, 24AZ. With its associated volunteer improvements totaling several hundred thousand dollars in value, these improvements, and subsequent charting with the FAA as AZ88, and the use it now enjoys for not only recreation, but by multiple governmental agencies including the USFS and US Air Force, this seems to be an oversight. You had mentioned that it would require input from others on the Forest Team, and we would gladly participate in conversations with anyone necessary to see this change in the EIS. Please also see the attached MOU between the USFS and the RAF as this, along with the willing team at the Tonto, lays the groundwork for the collaboration we've enjoyed thus far

While aviation has been part of dispersed low impact access on the Tonto for decades, the increased popularity of backcountry short field capable aircraft over the last decade created an impetus for the aviation community to collaborate with the Tonto, and other forests around the country, on planning and maintenance related to this form of recreational access. In 2015 the Recreational Aviation Foundation entered a Memo of Understanding with the USFS recognizing this need and laying the groundwork for such collaboration. With 2 charted airstrips, Pleasant Valley/Young (24AZ) and Grapevine (88AZ) and two remote uncharted airstrips, Red Creek, and Buzzard Roost the Tonto is among the two forests in region where such access is most enjoyed in region 3. In addition to recreational use, volunteer efforts over the last 7 years have enabled the Grapevine airstrip to now be regularly used by multiple governmental agencies, including the Forest Service, and Air Force. The Forest service, under several Fire & Aviation's officers, the most recent being Justin Jagar, has been able to hold a multi-agency training at the airstrip, and the Air Force regularly uses the facility to conduct search & rescue training. The general aviation community has worked with both these groups to deconflict these uses with recreation. While the main purpose of the Grapevine airstrip is indeed recreation, joint use has been a goal of the aviation community. Thousands of volunteer man hours and many thousands of dollars in donations from the aviation community have been invested in the Grapevine, 88AZ airstrip. Aviation facilities have been considered by some in the region 3 as Fire & Aviation assets, but with no resources to maintain them, they provide little to no functionality for their needs. Recognition from congress and the Forest Service that these airstrips provide important recreational infrastructure helped pave the way to the partnerships between the aviation community and the USFS that now helps to provide the maintenance needed, and the resulting functionality and current joint use of these assets. It is based on this that we believe aviation must be addressed more fully in the Tonto plan. Please consider our suggested edits to the current draft plan offered below.

In the current "Draft" aviation is mentioned only one time. Recreation (REC) on page 21 Third Paragraph (see below). This seems insufficient to allow for future planning and management of recreational airstrips.

"Outdoor recreation is a multi-billion-dollar industry, continuously growing, and a vital economic opportunity for the communities the Tonto serves. More than three out of every four Americans participate in outdoor recreation each year. The Tonto National Forest offers many diverse recreation opportunities including hiking, mountain biking, horseback riding, rock climbing, four-wheeling, motorized and nonmotorized boating, whitewater paddling, hunting and fishing, wildlife viewing, scenic driving, developed and dispersed camping, backpacking, target shooting, back country aviation and much more. Every year, new forms of recreation emerge on the forest."

Need REC-DC, REC-O, REC-S, REC-G (note: these abbreviations are the FS designation for each topic from the plan) we suggest the following under each of the following:

Rec-DC

11 Airfields provide for the dispersion of recreation activities into areas of the forest that are underutilized, and the requirement exists to manage overcrowding at popular facilities.

REC-O

07 Airstrips are considered as an option for forest access in lieu of road construction.

REC-S

04 Airstrips are planned, constructed, and maintained to standards established by Forest Service Aviation.

REC_G

10 Airstrips are placed to enhance access while not detracting from the natural condition of the area.

Management Approaches for Recreation

The REC statements covers aviation adequately on page 23 under 07, and on page 24 under 11. Dispersed Recreation (REC-DIS) suggested additions page 25 first paragraph: "Dispersed recreation occurs throughout the forest, outside of developed Forest Service recreation sites, and involves activities which are not dependent upon developed facilities or sites. Examples include but are not limited to hiking, backpacking, hunting, wildlife viewing, rock climbing, off-highway vehicle use, equestrian use, and mountain biking, and airplane camping."

Needs REC-DIS-S, REC-DIS-G We suggest the following additions, page 25, 26: (We believe these additions are very important if nothing else!)

REC_DIS_DC

06 Airfields provide for the dispersion of recreation activities into areas of the forest that are underutilized, and the requirement exists to manage overcrowding at popular facilities

REC-DIS-S

04 Construction and maintenance maintain the natural condition of landing areas.

REC-DIS-G

09 Closed road surface may be used as runway in areas of road removal.

Management Approaches for Dispersed Recreation covers aviation adequately, page 27, 06, but we suggest the following in order to expand the use of volunteers beyond that of trails:

06. Utilize collaborative partnerships where volunteers plan, lead, and execute a majority of motorized and non-motorized trail infrastructure maintenance.

All of the above would be unnecessary if, like Water-Based Recreation (REC-DIS-WB) Page 30, Aviation could be inserted as a recreation activity along with aviation required components suggested below. Alternatively, this section could reside under transportation on or about page 58:

Aviation-Based Recreation (REC-DIS-AV) (The following wording is taken from existing WB statement) Aviation based recreational opportunities on the Tonto National Forest attract visitors and provide benefits to people at local regional, and national scales. Aviation access is time efficient, and low impact, and the aviation community generally maintains airstrips through volunteer efforts.

(The following could go under the water based recreation on page 30, or under roads since airstrips are simply an alternative to automobile and roads.)

DESIRED CONDITIONS (REC-DIS-AV-DC)

01 Airfields provide access for recreation and administrative activities in areas where road construction is not suitable or determined not to meet management area criteria.

02 Airfields provide continued access to areas where road profiles are removed, but an administrative requirement continues to exist.

03 Airfields provide for the dispersion of recreation activities into areas of the forest that are underutilized, and the requirement exists to manage overcrowding at popular facilities.

04 Airfields function as internal trailheads providing access to trail sections rarely used and areas of uncommon scenery.

OBJECTIVES (REC-DIS-AV-O):

01 Airstrips are considered as an option for forest access in lieu of road construction.

02 Airstrips accomplish providing access to area for administration, fire control, and recreation opportunities.

03 Construction and maintenance of airstrips provides reduction in overall transportation costs.

STANDARDS (REC-DIS-AV-S):

01 Airstrips are planned, constructed, and maintained to standards established by Forest Service Aviation.

02 Airstrips provide a safe approach and departure avenue to access the runway.

03 Construction and maintenance maintain the natural condition of the landing area.

GUIDELINES (REC-DIS-AV-G):

01 Airstrips are placed to enhance access while not detracting from the natural condition of the area.

02 Construction and maintenance are accomplished through volunteer agreements with pilot organizations.

03 Closed road surface may be used as runway in areas of road removal.

SUITABILITY (REC-DIS-AV-SU):

01 Airstrips will be determined based on the desired conditions applicable to those lands.

Facilities (FC) we suggest the following additions on page 59:

"The Forest manages a variety of buildings and infrastructure for a variety of purposes. These include administrative facilities (e.g., offices, warehouses, employee housing, and fire facilities) and public recreational facilities (e.g., visitor centers, campground or picnic area restrooms, airstrips, and storage buildings), associated water and wastewater treatment systems, dams, and electronic and communication towers."

Need FC-DC, FC-G Suggest:

F-DC

09 Construction and maintenance of airstrips provides reduction in overall transportation costs.

FC-G

06 Airstrips are placed to enhance access while not detracting from the natural condition of the area.

Guidelines (RWMA-G) Page 134:

Management activities, including transplants (e.g., removal, reintroduction, or supplemental introduction) of wildlife species, should be permitted to use motorized and mechanical means (e.g., helicopter, shortfield aircraft landings) if necessary to perpetuate or recover a threatened or endangered species, to restore the population of an indigenous species, or to manage wildlife populations.

Inventoried Roadless Areas (IRAMA) Page 146

Inventoried Roadless Areas only prohibit new road construction but allow existing roads to continue use within the roadless area (CFR's). Construction of airstrips could be allowed if provided some authority in the plan. Given the nature of airstrips (flat meadow, native vegetation runway surface) the impact of an airstrip is negligible within the roadless area and could provide necessary emergency and valuable recreational access to the interior of these areas.

Perhaps we could discuss the following as I am not certain how the Tonto treats roadless areas.

Appendix B. Proposed Probable and Possible Future Actions Page 184

Recreation:

07 Over the next 10 years consider additional airstrip sites.

Attachment: Service-wide MOU between the Recreational Aviation Foundation and the USDA, Forest Service,

WO

Thanks for chiming in! I understand and agree on the closed road issue. Use of closed roads would make sense only if some sort of low impact access to a roadless area was a desired goal. In a much more stringent model, airstrips in several wilderness areas in the northwestern states, for example, bring administrative and recreational access to the interior of these areas resulting in further dispersion of activities in these wilderness areas. People who have hiked the more common foot, mule, or equestrian access routes into wilderness areas would likely understand the need to offer alternative methods of access to the interior of wilderness areas. Again, we understand that any motorized access to a roadless area may not be a goal, but if it were left an option, it may come in handy from time to time. Certainly not a sticking point from our community however.

I hope this email finds you well!

I am very sorry, but I have conflicts with pretty much every meeting scheduled in the recent email. I was hopeful that perhaps I could swing by the Supervisor's office and sit down with you on January 28th or 29th as I will be in Phoenix those days. PLEASE LET ME KNOW!

We've read the proposed plan, and have some comments, but I should say up front that we believe there are two ways of addressing our concerns, one is to sort of a piece meal approach where aviation is inserted in areas where other modes of recreation are delineated, and the other, perhaps a more organized approach is to simply add an aviation specific section. Please see attached and let me know what you think! We feel that the addition of at least one or two of our suggested verbiage is critical in order to provide authorization of aviation in future travel planning activities.

Apart from the attached, one thing that really stands out is in the Draft Environmental Impact Statement Volume 1. This mentions, on page 229, "The Pleasant Valley Airstrip located in Young, AZ is the only one that is officially part of the Tonto National Forest transportation infrastructure..." It seems that Grapevine, now being officially charted as AZ88, and the use this now very popular airstrip it enjoys between the USFS, USAF, and recreational aviation community, it should be considered along with Pleasant Valley, 24AZ, as part of the formal infrastructure.

We'd also like something like this added "all airstrips on the Tonto National Forest, regardless of status, are being maintained by user group volunteers and private donations..." This is such nice model and success story, seems it would make sense to mention it. We've taken a serious look at the draft plan and have attached the following document detailing our suggested changes involving aviation. The bottom line is we appreciate what you and the planning team are doing, and we want to provide meaningful input.

On the meetings, I believe we'll have various members of the RAF and board members of the Arizona Pilot's Association present, but we will all be working from this email and attached as far as our suggestions.

Thanks in advance for your consideration of our efforts to date and suggestions here!

Thanks for chiming in! I understand and agree on the closed road issue. Use of closed roads would make sense only if some sort of low impact access to a roadless area was a desired goal. In a much more stringent model, airstrips in several wilderness areas in the northwestern states, for example, bring administrative and recreational access to the interior of these areas resulting in further dispersion of activities in these wilderness areas. People who have hiked the more common foot, mule, or equestrian access routes into wilderness areas would likely understand the need to offer alternative methods of access to the interior of wilderness areas. Again, we understand that any motorized access to a roadless area may not be a goal, but if it were left an option, it may

come in handy from time to time. Certainly not a sticking point from our community however.

I hope this email finds you well!

I am very sorry, but I have conflicts with pretty much every meeting scheduled in the recent email. I was hopeful that perhaps I could swing by the Supervisor's office and sit down with you on January 28th or 29th as I will be in Phoenix those days. PLEASE LET ME KNOW!

We've read the proposed plan, and have some comments, but I should say up front that we believe there are two ways of addressing our concerns, one is to sort of a piece meal approach where aviation is inserted in areas where other modes of recreation are delineated, and the other, perhaps a more organized approach is to simply add an aviation specific section. Please see attached and let me know what you think! We feel that the addition of at least one or two of our suggested verbiage is critical in order to provide authorization of aviation in future travel planning activities.

Apart from the attached, one thing that really stands out is in the Draft Environmental Impact Statement Volume 1. This mentions, on page 229, "The Pleasant Valley Airstrip located in Young, AZ is the only one that is officially part of the Tonto National Forest transportation infrastructure..." It seems that Grapevine, now being officially charted as AZ88, and the use this now very popular airstrip it enjoys between the USFS, USAF, and recreational aviation community, it should be considered along with Pleasant Valley, 24AZ, as part of the formal infrastructure.

We'd also like something like this added "all airstrips on the Tonto National Forest, regardless of status, are being maintained by user group volunteers and private donations..." This is such nice model and success story, seems it would make sense to mention it. We've taken a serious look at the draft plan and have attached the following document detailing our suggested changes involving aviation. The bottom line is we appreciate what you and the planning team are doing, and we want to provide meaningful input.

On the meetings, I believe we'll have various members of the RAF and board members of the Arizona Pilot's Association present, but we will all be working from this email and attached as far as our suggestions.

Thanks in advance for your consideration of our efforts to date and suggestions here!