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May 16, 2011

Forest Service Planning DEIS
C/o Bear West Company
132 E 500 S
Bountiful, UT 84010

Re: 36 CFR Part 219 National Forest System Land Management Planning; Proposed Rule

To Whom It May Concern:

The Aircraft Owners and Pilots Association (AOPA) is a not-for-profit individual membership association that represents the general aviation interests of more 400,000 members, including two-thirds of the nation's pilots. AOPA is committed to ensuring the future viability, safety and development of general aviation airports and their facilities as part of a national transportation system. Our members enjoy using the many backcountry airstrips located in the national forests. AOPA participated in all four of the Forest Service Planning Rule National Roundtables and the National Forum and appreciates the opportunity to submit the following comments on the proposed rule.

A backcountry airstrip is an essential part of a forest transportation system that allows access to remote parts of the forest for recreation, forest management and humanitarian needs. An airstrip serves as a trailhead for pilots and their friends and families to experience the forests by hiking, camping and fishing in a wider dispersed area than regular forest visitors. An airstrip allows a limited-mobility visitor to experience the forest to get a true backcountry experience that is not available via wheeled transportation; an experience not normally available to such people. An airstrip provides an emergency landing field for an overflying aircraft in trouble. And, an airstrip serves a vital role in emergency services in the event of trying to evacuate an accident victim from the forest. In recognition of these many benefits that backcountry airstrips provide to the general public, the United States Congress passed a resolution recognizing "the value of recreational aviation and backcountry airstrips located on the Nation's public lands and commends aviators and the various private organizations that maintain these airstrips for public use." House Resolution 1473, 111th Congress, 2d Session, September 14, 2010.

Our specific comments to the proposed Planning Rule focus primarily on Section 219.10, Multiple Uses. In Section 219.10 the planning rule states that "the plan *must provide* (emphasis added) for multiple uses, including ecosystem services, outdoor recreation, range, timber, watershed, wildlife and fish, as follows..." Section 219.10 (a) (1) lists a number of items that the responsible official shall consider, AOPA requests that airstrips be added to that list as an item for consideration. Again in subsection (a) (3) we suggest adding the words "to include airstrips" at the end of that clause.

In Section 219.10 (b) (1) we recommend replacing the word “should” in the second sentence with the word “shall” so that it reads “The plan shall identify recreational settings and desired conditions for scenic landscape character.”

Outdoor recreation is identified in the DEIS as an important component of national forest and grassland management. It continues to grow as more and more Americans take advantage of our national forests and public lands. Given the multitude of recreational uses and activities we suggest that the Planning Rule make Outdoor Recreation a standalone section and enumerate uses and access methods to include aircraft landing sites on land and water that must be considered by the responsible official. This would be consistent with the Service’s goal of dispersed recreation by utilizing internal trailheads.

Another area of concern to AOPA is that the Forest Planning Rule does not seem to coordinate with other required planning actions such as the Travel Management Plan required for each Forest Service unit. In our experience with general aviation airports across the country, we regularly see municipality comprehensive plans fail to take into consideration airport master plans with sometimes debilitating effects on the airports. While the analogy is not exact, we contend that travel management plans must be written so as to adhere to the Planning Rule and request a section in the Planning Rule stating that.

AOPA commends the Forest Service for including aviation as a legitimate use of the national forests in the definition of sustainable recreation. Given the long history of aviation on the forests it is only fitting that recreational aviation continue to play a role in introducing citizens to these national treasures and allowing those who might not otherwise be able to experience the wonder of the backcountry an opportunity to do so.

Thank you for your consideration of our views on this planning rule. We look forward to continuing to work with the Forest Service to maintain and enhance recreational aviation access to the national forests.

Sincerely,

A handwritten signature in dark ink, appearing to read "John L. Collins", written in a cursive style.

John L. Collins
Manager
Airport Policy