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June 11, 2024

Department of the Interior
Bureau of Land Management
Monticello Field Office
365 North Main Street
P.O. Box 7
Monticello, UT 84535

**Re: Bears Ears National Monument Resource Management Plan Comments
(NEPA Number: DOI-BLM-UT-Y020-2022-0030-RMP-EIS)**

Aircraft Owners and Pilots Association (AOPA) is the world's largest aviation community representing hundreds of thousands of pilots nationally, over 31,000 in the Northwest Mountain Region, and over 3,100 in the state of Utah alone. **AOPA strongly opposes the onerous restrictions to airstrip access being proposed by this recent Bureau of Land Management (BLM) Resource Management Plan (RMP) that would prohibit aircraft operations at all but two of 18 airstrips in Bears Ears Monument.**

Access by general aviation aircraft for private, non-commercial use of airstrips protects the National Monument by exposing the natural beauty of the area to a wide range of our populous. Backcountry aviation enthusiasts are thoughtful stewards of airstrips on Federal lands wherever they are. For instance (and according to the Utah Backcountry Pilots (UBCP) organization), in the past 70 years, there has not been a single noise complaint due to aircraft operations in the Bears Ears Monument area. Any noise from aircraft is transient and of short duration, in fact peer-reviewed research substantiates the fact that small aircraft noise has no detrimental impact on wildlife.

As a guiding philosophy, aviators are non-motorized recreationists, participating in hiking, camping and other low-impact activities. The evidence is clear that these users practice "Leave No Trace" ethics and do in fact leave these airstrips in better condition than when the users first arrived. Finally, these strips are often so rustic that other individuals recreating in these wilderness areas are rarely even aware of their existence. Aviation has a small environmental footprint, the lightest footprint form of access to these lands. Access by air requires NO road, nor infrastructure like bridges or corrals, eliminates miles of dusty road traffic and as these airstrips are situated on natural flat land features, such as level, open meadows, there is little (if any) occurrence of soil disturbance or erosion.

AOPA has been seeing an unsettling nationwide trend of federal agencies like the BLM seeking to impose unreasonable and unjustified restrictions and prohibitions on aircraft operations on PUBLIC lands and implore this decision-making body to reject the aircraft-restricting aspects of

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this RMP as we find actions such as these restricting and/or prohibiting operations on public lands both needless and discriminatory against the aviation community.

AOPA views proposed restrictions and/or prohibitions to flight at any airport/airstrip anywhere as a threat to the freedom to fly enjoyed by all pilots, particularly as these long-established backcountry airstrips are part of our aviation history and experience. Most Utah backcountry airstrips predate the 1964 Wilderness Act and as such, access and use of these airstrips should be retained. Moreover, safety is also impacted as fewer strips are available for emergency operations such as firefighting, rescue, or emergency aircraft landings because of an inflight emergency.

For many individuals with mobility challenges, access to this pristine region can only be accomplished via air. On July 26, 2024, the Biden administration will recognize the 34th Anniversary of the Americans with Disabilities Act (ADA) where we will again celebrate the inclusion and access promoted by this landmark civil rights law for disabled Americans. Continued access to airstrips like these 18 provides access to many of our fellow citizens that they would not have if it were not for the existence of these airstrips.

AOPA and the entire aviation community seek a continued cooperative and collaborative approach working with the BLM, US Forestry Service, and others to preserve access to airstrips on public land. We strongly recommend that all these airstrips within Bears Ears Monument area remain open for occasional use and that these airstrips will not only be recognized, but also better charted and included in the final iterations of this RMP as well as future Travel Management Plans.

Please consider me a resource on this issue and other matters impacting general aviation. I can be reached at email: brad.schuster@aopa.org or by phone: 202-851-7502.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Brad Schuster', written over a light blue horizontal line.

Brad Schuster, AOPA
Northwest Mountain Regional Manager