



Drone Service Providers Alliance

August 17, 2021

To whom it may concern.

It was with great disappointment that I found out that GMUG is considering closing 38,000 acres to UAS (drone) use. FW-STND-REC-09 is a wholly unnecessary and an unfair attempt to close off perfectly good areas of the National Forest to safe and responsible drone flyers.

But first a little about myself: I am a commercial drone pilot with 100's of hours in the air, and 1000's of flights under my belt. I work as a Drone Safety volunteer for the FAA Safety Team out of the Denver FSDO, I'm a member of the FAA's Drone Advisory Committee, and Director of Legislative Affairs for UAS Colorado. I am also the VP/COO of Drone Service Providers Alliance, a 501(c)(6) that works as advocates for the small and medium size commercial drone pilots. We represent about 95% of the 237,394 registered commercial drone pilots listed on the FAA's Pilot Summary.

Our National Forests provide some of the most beautiful areas in Colorado to fly our drones and capture imagery worthy of sharing with others. Closing off some of the most accessible areas to us would be a shame. It would also be an undue burden on many who are mobility challenged. Many people in that category use drones to increase their ability to see things that they otherwise could not. That includes people in wheelchairs of course, but it also includes those who may be elderly, suffer from respiratory issues, or even be limited in their ability to walk.

At 58 years old myself, I'm not able to walk as far as I once could. I have degenerative knee issues, and am limited over rough terrain. At present, there would't be that many issues with me walking a ways to get to a legal launch area, but down the road that will not be an option w/o surgery. And even surgery is not a guarantee.

And there really is no reason for this drastic approach.

Drone use is not the problem some thinks it is. There hasn't been the proliferation of drones that many feared, nor will there ever likely be. By all mean, drones have no place in Wilderness areas, wildlife areas, research areas, and many other areas designated in your plan. Even prohibiting drone use at campgrounds, visitor centers and parking lots is also not a bad idea. Most of those areas are congested at times, and who really wants to hear a drone at a



campground? As an avid drone user myself, I know I wouldn't want to. We would also like to see a definition of a parking lot included. Obviously ones around visitors centers and scenic overlooks would be considered lots, but what about pull offs on backcountry roads? See below for more on pull offs.

But to close off 38,000 acres of the aptly named *Recreation Emphasis Corridor* defeats the very purpose of those areas. Recreation is why many of us fly our drones.

And closing off areas of roads and trails isn't logical at all.

The main *legitimate* complaint we hear from non-drone users is noise. And yes, our drones create noise. It's a matter of physics. But that noise is mitigated by distance and prop design. Modern drones have quieter props, and are barely audible from as close away as 100'. And when it comes to roads, drones are the least of the contributors to noise. You have motorcycles, 4-wheelers, and other off-road vehicles. Prohibiting drones is pointless in those areas. It would do marginally little (if anything) to diminish noise there.

Additionally, it would be a safety factor if you closed those roads off. Roads afford us open areas to be able to fly from. Both commercial and recreational drone owners must keep their drones in sight at all times (some commercial operators do have waivers, but it's unlikely that would come into play in GMUG lands). If we can't fly from those open areas near roads, then we have to fly from the forested areas. So we would have limited line of sight unless we could make it out to an area that was open. And in those areas, we'd be much more likely to have areas we wouldn't be able to safely launch from, and we'd be more likely to disturb wildlife. If wildlife is disturbed by human interaction and noise, they would be less likely to be near roads and trails. Flying from those roads and trails would be less disturbing to them.

Many off-road enthusiasts use drones to capture imagery of their trail rides. So closing those off would make their perfect safe and creative use of drones illegal.

Let's talk a bit more about safety. The FAA has many rules in place already to address drone safety. Those include not flying over people (new rules now allow that in limited instances), as well as the aforementioned line of sight (VLOS) rules. We also must register our drones if they are over 250 grams, and take a safety course to be able to fly. The new FAA rules for recreational flyers, whom it seems these rules are geared towards, include the requirement to take The Recreational UAS Safety Test (TRUST) before they are allowed to fly. Recreational users must take that and carry their completion certificate with them when they fly. Because of that, both recreational and commercial drone users are now more educated about safety and such than ever before.



Closing the areas you are looking to close is a solution in search a problem. There are many other solutions for actual problems that exist already. DOI can require that anyone flying drones from NFS property be property credentialed (TRUST or 107 Certificate), follow all FAA regulations, and stay a certain number of feet away from other people when launching and landing.

There are multiple ways for the GMUG areas to address the issue of drone flights w/o the drastic measure of needlessly closing off so much of the areas that are proven to be safe and pleasurable for drone users to fly from.

Also, if GMUG were to institute rules like this, it could easily set a precedent for other districts to follow, thus compounding the issue on a national scale. Unnecessarily closing the National Forest areas to the UAS community would show bad will from the DOI, and be very disappointing to every drone owner in the United States. We enjoy our national forests just as much as every other user. We should be allowed to continue to safely do so with our marvelous flying machines.

As a UAS industry leader, I'm more than willing to work with you and the National Forest Foundation to come up with a reasonable compromise to your plan that would satisfy all but the most militant from each side. I've done this before with many city and county agencies, and even helped write Colorado drone law with this very outcome in mind.

Thank you in advance for you time, and I look forward to working together for a reasonable outcome on this issue.

Vic Moss.

Owner/Moss Photography-www.mossphotography.biz
VP COO/Drone Service Providers Alliance-www.dspalliance.org