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Comments: My scanner will not capture my signature and with no mailing address I can't submit a copy by mail. I should be well known as I have had close contact with the Gallatin for years.

Date: 8/27/2020

I, as a member of the pilot community and a regular user of airstrips on public land, object to the draft Record of Decision, Forest Plan and FEIS for the Custer Gallatin National Forest Land Management Plan released by Regional Forester Leanne Marten.

I am a retired U.S. Forest Service (FS) employee of Region One, Engineering pursuing a lifelong passion for backcountry camping using an aircraft for access. I am currently the Montana State Liaison for the Recreational Aviation Foundation (RAF) who represents over 10,000-pilots from across the US. I am also a member of the Montana Pilots Association (MPA) who represents over 600-pilots across Montana.

Having participated in the Early (1990's) planning activities within the FS, participated in the public scoping of the 2012 Planning Rule, participated in the public scoping of the USFS Directives from which the FSH 1909.12 was derived, and having participated in numerous public agency planning activities, I have a good understanding of the process.

I have standing on this issue because I have participated in the scoping process beginning with the [Idquo]Community Meeting Kickoff [ndash] Winter 2016[rddquo]; commented on the [Idquo]Proposed Action[rddquo](See Appendix1); attended all meetings and commented to all comment periods throughout the process and have commented (winter/spring 2019) on the Draft Plan/DEIS Pub. No. R1-19-08 (See Appendix 2).

Italic text is excerpts from the FIES, CFRs, or other official guidance.

Text in Red is suggested improvement of statement or document text requested to be removed or replaced.

Review of this plan shows a professionally written plan with appropriate treatment of the many aspects addressed by a forest located geographically where the Custer Gallatin is positioned. The treatment of planning components provides a clear picture for future managers addressing the changing conditions, as applies to wildlife, landscape, and social challenges on direction to proceed over the next 20 [ndash] 25 years. However, several plan components are missing from some of the activities addressed in this plan. Wolverine is an example, page 67,68, where only a desired condition and guideline are presented. Also, standards and guidelines throughout the document tend to be negative (as thou shalt not) rather than provide constructive guidance that allows the standard or guideline to be applied to the activity or project being considered. This shortfall is addressed in:

CFR 36 [sect]219.7 New plan development or plan revision states: (e) Plan components. Plan components guide future project and activity decision making. The plan must indicate whether specific plan components apply to the entire plan area, to specific management areas or geographic areas, or to other areas as identified in the plan.

(1) Required plan components. Every plan must include the following plan components:

(i) Desired conditions, (ii) Objectives, (iii) Standards, (iv) Guidelines, (v) Suitability of lands

This is interpreted to mean that each management activity identified as important to manage should have at least one statement in each of the above listed components.

This brings us to the main issue of this objection.

Issue:

Airfields, Aircraft Landing Strips (AIRFIELDS) Page 87

Situation: A narrative inserted at appropriate places to help you envision the problem a future manager is going to have trying to use this plan.

Five years down the road a new ranger has been assigned to the Ashland Ranger District; his previous experience is on the Pisgah National Forest in North Carolina. He is approached by a pilot group to build an airstrip on the district and goes to the forest plan and this section to get guidance for his discussion with the pilot group. He learns there are no airstrips on the Custer Gallatin, he also learns there is no guidance in this section other than some [ldquo]shalt not[rsquo][rdquo]. How does he proceed?

CFR 36 219.7 (above) states it clearly! This section does not meet the requirements of this CFR.

The forest attempted to accomplish tiering with this statement: Desired conditions under Roads and Trails and General Recreation apply to public recreational motorized aircraft landing strips. (Introduction page 87)However, the listed sections in this statement do not mention airstrips in any of the components of these sections. I direct you to the H L&C NF Forest Plan, May 2020 for a proper tiering approach: (See Recreational Opportunity Spectrum, page 67 [ndash] 68; Recreation Access, page 72; Infrastructure, page 103; Facilities, page 106; Social and Economic Characteristics; page 178) for airstrip treatment using tiering instead of a specific airstrip section.

Addressing the incomplete plan components: (A set of suggested components is provided below)

Standards (FW-STD-AIRFIELDS)

01 Public recreational motorized aircraft landing and take-off shall only be allowed at designated and authorized sites. (page 87)

This standard is in conflict with CFR 36[sect]212.51 Designation of roads, trails, and areas, and [sect]261.13 Motor vehicle use, both of which exempts aircraft.

02 Any new public landing and take-off locations shall be constructed, maintained, and operated by the holder of a special use authorization. (page 87)

This standard is a negotiating point between the FS and the pilot community and should not be listed as a strict rule with no flexibility. To our knowledge no FS backcountry airstrip is under special use permit except a few such as Lincoln Airstrip in Lincoln, Montana, which is administered by the State of Montana. As for construction, I reference Russian Flat airstrip on the H L&C NF, which was funded, and constructed by pilot funding and without use of FS appropriated funds. As to maintenance, the pilot community mostly maintains the backcountry airstrips on NFS lands, and it should be pointed out congress, since 2013 has been designating \$750,000 from

the recreation appropriation (Appendix 3) be expended on backcountry airstrip maintenance. The pilot community mostly manages airstrips on NFS land by meeting at least annually with the affected forest, communicating good neighbor practices to pilots, and holding safety gatherings to discuss backcountry etiquette, mountain flying, and any issue that arises. The Recreational Aviation Foundation maintains a Memorandum of Understanding (Appendix 4) and a Cost Share Agreement (Appendix 5) with the FS which are supposed to pave the way for closer cooperation than we see with this forest.

Our new Ranger has no guidance as to what standards are required to accomplish the establishment of an airstrip on the ranger district, nor any useful information to discuss what must be addressed to meet standards set forth in the plan with the pilot group.

Suitability (FW-SUIT-AIRFIELDS)

01 Public aircraft landing strips are not suitable in designated wilderness, the Hyalite Porcupine Buffalo Horn Wilderness Study Area, the Cabin Creek Recreation and Wildlife Management Area, National Natural Landmarks, the Wild Horse Territory, research natural areas, special areas, recommended wilderness areas, within $\frac{1}{4}$ mile each side of eligible wild rivers, within $\frac{1}{2}$ mile each side of the Continental Divide Trail, riparian management zones, areas of primitive or semi-primitive nonmotorized recreation opportunity spectrum, or within the grizzly bear recovery zone. Public aircraft landing strips are suitable in areas of rural, roaded natural and semi-primitive summer motorized recreation opportunity spectrum, outside of the areas listed in the preceding sentence.

Not sure how to address this piece of negatives[rsquo], across the U.S. there are airstrips in every one of the above stated areas. The pilot community recognizes new airstrips will not be built in designated wilderness,, National Natural Landmarks, and research natural areas as these are cover by law, and wild rivers, cover by plan directives. The rest of this list is negotiable on decision making addressing future requirements for forest access and prevailing access methods, which the pilot community feels aircraft access will a large consideration, as will the requirement for recreation expansion into areas where road access is not available and not desired. The FEIS accompanying this plan has designated 940,256 acres across the geographic areas of alternative F (the preferred alternative) as acreage suitable for aircraft landing strips. You would think a set of positive suitability component statements to support the decision-making process would be provided to help identify areas within this huge designated acreage to put a less than five (5) acre airstrip.

Here again our ranger is at a loss for guidance as to where suitable areas are for discussion with the pilot group. He also can find no official (regs, policy, or law) guidance that restricts his choice of placing an airstrip in any of the listed areas. Having just come from a forest overrun by recreationists and closing in hollows (meadows) he is shocked at the deficiency of usable planning guidance to address this airstrip activity being proposed by the pilot community. There are no [rsquo]Desired Conditions[rsquo] to provide an understanding of what the results the project should present at project completion: No [rsquo]Objective[rsquo] statements to provide understanding of what he wants to archive in the way of solving existing problems that address access: No [rsquo]Guidelines[rsquo] to help him understand his options on placement, insurance of no environmental damage, or where does help to accomplish the project come from.

Suggested Solution

Pilot Community suggests rewrite of the: Airfields, Aircraft Landing Strips (AIRFIELDS)

Should you reconsider your stated position on the (Airfields) section, may we suggest some statements for Desired Conditions, Objectives, Standards, Guidelines, and Suitability.

DESIRED CONDITIONS (FW-DC-Airfields)

1. Airfields provide access for recreation and administrative activities in areas where road construction is not suitable or determined not to meet management area criteria.
2. Airfields provide continued access to areas where road profiles are removed, but an administrative requirement continues to exist.
3. 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.
4. Airfields function as internal trailheads providing access to trail sections rarely used and areas of uncommon scenery.

OBJECTIVES (FW-OBJ-AIRFIELDS):

1. Airstrips are considered as an option for forest access in lieu of road construction.
2. Airstrips accomplish providing access to area for administration, fire control, and recreation opportunities.
3. Construction and maintenance of airstrips provides reduction in overall transportation costs.

STANDARDS (FW-STD-AIRFIELDS):

1. Airstrips are planned, constructed, and maintained to standards established by Forest Service Aviation.
2. Airstrips maintain a safe approach and departure avenue to access the runway.
3. Construction and maintenance maintain the natural condition of the landing area.
4. Sufficient airstrip infrastructure (windsock, landing area delineation) is maintained to ensure safe aircraft operation into and out of the airstrip.

GUIDELINES FW-GDL-AIRFIELDS):

1. Airstrips are placed to enhance access while not detracting from the natural condition of the area.
2. Construction and maintenance are accomplished through volunteer agreements with pilot organizations.
3. Closed road surface may be used as runway in areas of road removal.

SUITABILITY (FW-SUIT-AIRFIELDS):

1. Airstrips will be determined based on the desired conditions applicable to those lands.
 2. Airstrips are suitable to provide access to trails, lakes, and streams where access is not available by other means.
 3. Airstrips are suitable to be placed near underutilized recreation assets.
 - 4.
- Airstrips are suitable in all management areas where impact is determined to be within established limits.

Goals (FW-GLS-AIRFIELDS)

1. Make remote sections of the forest more accessible to handicapped and elderly visitors.
2. Expand dispersed recreation opportunities to relieve overcrowded facilities.
3. Address the changing character of access methods.
4. Provide quicker access for administration, fire, and safety.

Justification:

The reason for airfields on NFS Land in the beginning was the extreme distances traveled by horseback to accomplish administrative activities such as Fire Lookout resupply, trail maintenance, fire suppression, emergency rescue, and administrative site maintenance. Over the years, since the 1930's, road construction for inholding access, logging, and administrative site access has provided an access network that reduced the reliance on the airplane. But these activities are still supported by airfields on the Flathead NF, Nez Perce-Clearwater NF, Helena-Lewis and Clark NF, and Tonto NF to name just a few supporting and utilizing airstrips.

With the requirement to reduce road density on national forests, an increased congestion on forest roads by recreationists, and a continued administrative requirement on remote landscapes, the airplane and airstrips still have a utility. They also provide a recreation dispersion to areas of prime recreation opportunities that are at present underutilized. (Appendix 6)

Some disturbing statistics for you folks still working in the FS is that in 2012 CNN broadcast that "Baby Boomers were becoming eligible to retire at the rate of 7,000 per day (that's 2,549,750 per year; and 637,438 if only 25% retire in a given year). You are seeing it today and trying to adjust so your plan must accommodate this impact in a positive forward-looking guidance.

Our ranger deserves guidance he can use to provide him background, positive forest policy which is in accord with national forest policy (Appendix 7), and meets the requirements of congressional guidance (Appendix 3; 112 Congress Report; Backcountry Airstrips), National Forest guidance found in the 2012 Planning Rule and the Forest Directives so he can communicate effectively with interest groups (in this case Aviation) that seek to utilize the Forest.

A Short History

The problem the pilot community has encountered lies in the long term (over 20 years) negative position on airstrips within the boundaries of the Custer Gallatin National Forest. Montana Pilots Association made contact (Appendix 8) with the Gallatin Forest as early as 1998 and have discussed, negotiated through meetings, participated in planning from the early 2000's, including attendance at all public meetings, and commenting on all opportunities from the assessment, through the present draft Plan and Draft EIS for the plan development under the 2012 Planning Rule. The extent of the Forest's negative position of the is expressed in an "Aircraft Use Restriction" order posted 7/13/2007. (Appendix 9)

Given the Forest's decision to create a section for treatment of Airfields, Aircraft Landing Strips (AIRFIELDS), the pilot community would like to receive consideration that meets the intent and requirement of the planning regulations, provides forward looking guidance, and establishes aircraft access as a planned for management consideration.

Thank you for considering this objection

Ron Normandeau

Montana Pilots Association

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