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First name: Patrick

Last name: McKay

Organization: Colorado Offroad Trail Defenders

Title: Vice President

Comments: I would like to briefly respond to the comments by Great Old Broads for Wilderness regarding drones.

First I wish to point out that contrary to the Broads' assertion, the majority of the drone advocates on the webinar regarding the proposed drone restrictions were Colorado locals who frequently visit the GMUG NF and have often flown drones there themselves. Colorado happens to be a regional hub of the drone industry with many drone companies, organizations, and users based here. Colorado drone enthusiasts (including both commercial and recreational photographers) have long enjoyed the ability to fly largely unhindered on National Forest lands, which provide excellent locations to capture scenic video footage and photographs from the air. Great Old Broads' characterization of drone advocates' interest in this process as mainly out-of-state commercial users exploiting the Forest for profit is simply untrue.

Second, there is no basis for prohibiting drones in Special Management Areas, Colorado Roadless Areas, and Wildlife Management Areas, as Broads requests. There is no scientific evidence that drones have any lasting negative effects on the wildlife species the WMAs in the draft plan are intended to protect. While it could be appropriate to prohibit drones in specific places where there is a documented risk of negative impacts to wildlife (near raptor nests, for example), such prohibitions should be based on the best available science and should be narrowly targeted. Prohibiting drones in all Wildlife Management Areas across the board is simply not warranted or scientifically justified.

Colorado Roadless Areas were established solely to prohibit new road construction and logging operations, and there is no basis for prohibiting drones there. Drone flying does not involve any surface disturbance and does not create any impacts that the Roadless Rule was intended to address. The Colorado Roadless Rule also expressly allows the presence of motorized trails, so it does not create any expectation that motorized devices will be prohibited there as they are in Wilderness. While Wilderness groups like Great Old Broads love to treat Roadless Areas as if they are essentially the same as Wilderness, legally that is simply not the case. Roadless areas are not Wilderness, nor are they exclusively dedicated to so-called "quiet uses". There is therefore no basis in law or practice to categorically exclude drones from being flown in Colorado Roadless Areas.

The same is true of the special management areas proposed in Alternative D. These management areas are proposed to be managed for a variety of specific goals and objectives. There is no inherent nexus between the goals of these proposed SMAs and prohibitions on drone use. Because drones are motorized devices, a case could be made that for consistency, drones should be prohibited in SMAs that are designated as having 'no' motorized suitability. But that would not apply to the majority of SMAs which allow at least limited motorized use. As discussed in our previous comments, there is no rational basis for prohibiting drones in areas where other far more impactful motorized uses are allowed.

Finally, I wish to address Great Old Broads' contention that, "drone footage on social media has contributed to overuse and abuse of some scenic areas within the GMUG." There is no evidence that drone footage on social media has had any greater effect than ground-based photography in promoting increased recreation on the GMUG. Even if there were, however, we note that taking photographs on public lands and then sharing them on the Internet is a form of First Amendment protected expression. As a governmental entity, it would be wholly inappropriate for the GMUG National Forest to consider the effects of Forest users' speech as a basis for imposing restrictions on photography, whether aerial or ground-based. As was pointed out multiple times during the drone webinar, drones are primarily flying cameras and are used as tools which enable First Amendment expression. While the government may regulate the activity of flying

drones, it may not regulate the speech they enable without running afoul of the First Amendment. Any restrictions on drone operation in the Forest Plan should therefore be based solely on the impacts of drones themselves, not the speech they enable.