



AIRCRAFT OWNERS AND PILOTS ASSOCIATION

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Gary E. Slagel
Monument Manager
BLM Lewistown Field Office
PO Box 1160
Lewistown, MT 59457

Dear Mr. Slagel:

The Aircraft Owners and Pilots Association (AOPA), is the world's largest aviation association representing more than 404,000 individual pilots and aircraft owners nationwide. Thank you for the opportunity to provide these comments to the Upper Missouri River Breaks National Monument Draft Resource Management Plan.

General aviation aircraft offer safe, efficient and environmentally friendly access to our nation's remote and backcountry regions. AOPA offers the following comments to the Upper Missouri River Breaks National Monument Draft Resource Management Plan.

Background on general aviation and backcountry airstrips

General aviation by definition includes all flying except military scheduled passenger airlines. General aviation contributes more than \$102 billion annually to the U.S. economy and transports more than 166 million passengers a year. While general aviation may be a large industry comprised of a variety of aircraft, a significant number of aircraft weigh less than a passenger car and carrying but a few people.

A number of general aviation aircraft are ideally suited to be operated by pilots with exceptional skill on unimproved airstrips. These aircraft operators have the utmost respect for the environment and operate in such areas to enjoy the beauty of their surrounding, such as the backcountry airstrips in the Upper Missouri River Breaks National Monument area.

In addition to providing access for visitors, backcountry airstrips save lives by providing general aviation aircraft options for a safe landing in the event of an in-flight emergency. Especially while flying over otherwise unforgiving landscape, a backcountry airstrip can be used by a pilot experiencing mechanical problems or needing to wait out the ever-changing and potentially dangerous weather that is prevalent in the region.

Furthermore, backcountry airstrips provide a means to provide supplies to campers, assist in search and rescue efforts and can be used by aircraft involved in wildlife conservation and aerial firefighting.

Backcountry airstrips are vital assets that need to be preserved and accounted for. AOPA encourages the BLM to reject Alternative E of the Draft Resource Management Plan, which would close all airstrips.

Discussion on Alternative F – Preferred Alternative

AOPA generally supports the Alternative F, the preferred alternative.

AOPA is especially encouraged to see that Alternative F would allow minimal hand maintenance of airstrips, and more extensive maintenance and improvements with prior authorization. Pilots utilizing these airstrips have a strong desire to be involved in their maintenance and care. This is largely based on the simple principal that pilots want to make the airstrip safe and useable for the next pilot to land there. AOPA strongly encourages the adoption of this provision in the final Resource Management Plan.

Alternative F would keep six of the ten existing airstrips open. While AOPA understands the selection of airstrips to avoid clustering, we remain concerned about the loss of potentially valuable places to land. AOPA would encourage the BLM to maintain its existing posture of working with the aircraft operators utilizing these airstrips to see if arrangements can be reached to maintain and preserve additional landing facilities within the Upper Missouri River Breaks National Monument.

Procedures for closing airstrips

The Draft Resource Management Plan does not outline the procedure by which the BLM would utilize to close an airstrip. AOPA is extremely concerned that the safety and well being of a pilot could be jeopardized if an airstrip is not properly marked for closure. The accepted Federal Aviation Administration (FAA) procedure for closing a runway is to issue notification to pilots and to mark the runway or landing area with a visible "X" placed near the landing ends of the runway. (see FAA Advisory Circular 150/5340-1J)

Most importantly, AOPA encourages the BLM to consider the safety of the pilots who may be either unknowingly attempting to land on a closed airstrip or encountering an emergency that would constitute a need to land. We believe that obstructions must not be placed across a runway and that no ditches be dug on the landing surface since obstructing the landing area could endanger the life of the pilot and passengers. We expect the BLM to follow the FAA's guidance to properly mark closed runways.

Conclusion

AOPA generally supports the preferred alternative, Alternative F. We look forward to working with the BLM and hope we can achieve a mutual agreement to preserve as many airstrips as possible.

If you have any questions, do not hesitate to contact me at (301) 695-2106.

Sincerely,



Roger Cohen
Vice President
Regional Affairs