



August 28, 2021

National Park Service
 Natural Sounds and Night Skies Division
 OLYM and MORA ATMP
 1201 Oakridge Dr., Suite 100
 Fort Collins, CO 80525

Dear National Park System Managers:

We write to express our deep concern about the inadequate process being used to solicit public comments on proposed Air Tour Management Plans (ATMPs) for Mount Rainier and Olympic national parks, and especially about the potential loss of natural sounds and quiet in these world-class park treasures.

National parks are a treasured and beloved resource to Americans and represent the culmination of hard-fought conservation battles resulting in core wildlife habitat protection, legislative Wilderness protections and a world-class recreational experience for American citizens and international visitors alike. Many of the undersigned organizations have worked to achieve these protections and policies. The draft ATMPs fall short of valuing and protecting these values and ignore consideration of the environmental impacts on this incredible resource.

As you know, ATMPs have been required pursuant to the National Parks Air Tour Management Act of 2000 (NPATMA) at national parks with significant or potential air tour activity where natural soundscapes may be at risk or degraded. Among the 24 parks subject to this requirement, Mount Rainier and Olympic are on the list because of current air tours or past proposals.

We understand that after 20 years no ATMPs had been finalized, and this resulted in a federal court order last year to enact these plans. We also understand that the current process of proposing ATMPs is being done with a deadline of August 2022 for completion. However, there is still time to do it right and these national parks deserve a more considered public process which results in better protection of park resources and visitor experience.

As you know, these ATMPs would only apply to commercial air tours – not private aviation, military or commercial airlines – within a limited area immediately above the parks up to 5,000 feet above the ground and within ½ mile of the park boundary. That low-level bubble of airspace is where impacts are most likely to occur from non-military aircraft for wildlife and park visitors, but it can easily be de-conflicted by requiring air tours to fly beyond that range to minimize impacts on wildlife, visitor experiences or wilderness values. Additionally, the peaks,

unbroken forests and other scenic views in these parks can, in most cases, be viewed equally well from outside of that immediate airspace.

Mount Rainier National Park

Mount Rainier National Park is one of the crown jewels of the national park system and is the tallest peak in Washington State and the entire Cascade Range. Mt. Rainier ranks 18th in visitation among all of America's national parks with more than 1.2 million visitors in 2020. For Mount Rainier, the proposed plan describes the park as "97% of the Park is designated wilderness. The Park offers a variety of natural sounds and a quietness not found in most urban or suburban environments." The plan goes on to describe that the "most developed areas in the Park...are of national significance and are included in the comprehensive Mount Rainier National Historic Landmark District." The plan also indicated that, "the Park serves as habitat for numerous federally-listed threatened and endangered species..." and "sound generating activities...have the potential to adversely affect marbled murrelets and northern spotted owls."

Olympic National Park

Olympic National Park is known for its iconic coastline, home to the largest temperate rainforest in the lower 48 states, deemed the quietest spot in the U.S. outside of Alaska. The park ranked 9th most popular among all national parks in 2020 with more than 2.5 million visitors. For Olympic, the proposed plan says "95% is designated wilderness. The Park's wilderness character is of inestimable value and among the most precious of the region's resources." The plan points out that "the Park has several national and international designations, including...UNESCO International Biosphere Reserve...UNESCO World Heritage List...and Point of Arches as a National Natural Landmark." The plan also indicates that "the Park serves as habitat for numerous federally-listed threatened and endangered species...northern spotted owls and marbled murrelets are likely to be disrupted by loud noises...or when activity occurs within the line of sight of nesting birds."

Obligations under the National Park Service Organic Act

The 1916 National Park Service Organic Act directs the National Park Service (NPS) "to conserve the scenery and the natural and historic objects and wildlife therein, and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." These proposed ATMPs fail to uphold that mandate by allowing low-level commercial air tours to continue based solely on flights the industry operators choose to fly, rather than an assessment of whether such activity serves any park purpose, or impairs park resources or visitor experience. Further, these proposed plans can be amended at any time if an existing air tour operator chooses to expand or a new operator starts up. The exclusion for now of helicopter air tours is appreciated, but at best temporary under the proposed plans and may change if a future operator, as in the past, wants to fly them.

There is no justification or data presented which indicates that these park values will be properly protected from commercial air tour noise. Even though NPATMA's legislative purpose is about protecting the natural sounds and quiet of these special places, neither the word "decibel" (the basic measure of noise level) nor any sound level numbers appear in these short proposed plans.

Insufficient Level of National Environmental Policy Act (NEPA) Analysis

This planning exercise is confusing and truncated as the overall goal is to create individual plans for 24 air tour management plans for 24 parks. Four parks, including Mt. Rainier and Olympic are moving forward with the current public comment period.

While it does not indicate how this process is complying with the NEPA (i.e., environmental impact statement, environmental assessment, categorical exclusion), we have been advised by NPS staff that each of the plans is proceeding under a categorical exclusion. This exempts it from analysis or consideration of alternatives, cumulative impacts analysis and environmental impacts to endangered species, wilderness character, and other resources and uses of the park. These categorical exclusions are being put forward in the absence of any programmatic assessment on such impacts for air tours and parks. Furthermore, similar planning efforts like a US Forest Service travel management plan, usually covering a smaller unit like a ranger district or watershed, are done as an environmental assessment.

NEPA requires a “hard look” at impacts and options, which this process is thwarting despite the resources and treasured landscapes at stake. At minimum, the NPS and Federal Aviation Administration (FAA) should be conducting an Environmental Assessment before allowing low-level commercial air tours over these wilderness parks.

One option which should be considered is a “no air tour alternative” which may be most appropriate over these parks and would also serve as a baseline for comparing other choices.

Our organizations and members call upon the NPS and FAA to take a closer look at more options to protect the resources and experience of Mount Rainier and Olympic national parks, including a “no air tour” option, and to preserve and restore the natural sounds and quiet of these nationally significant wilderness landscapes as much as possible.

Sincerely,

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U.S. Senator Patty Murray
U.S. Senator Maria Cantwell
U.S. Representative Kim Schrier
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