



August 26, 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:

On behalf of The Mountaineers, thank you for the opportunity to provide comments on the proposed Air Tour Management Plans (ATMPs) for Mount Rainier and Olympic National Parks.

The Mountaineers, based in Seattle, Washington and founded in 1906, is a nonprofit outdoor education, conservation, and recreation organization whose mission is “to enrich the community by helping people explore, conserve, learn about and enjoy the lands and waters of the Pacific Northwest and beyond.” The Mountaineers Books publishing division expands the mission internationally through award-winning publications including instructional guides, adventure narratives, and conservation photography. 1,600 skilled volunteers lead 3,200 outdoor education trips and courses annually for 14,000 members. Our youth programs provide over 10,000 opportunities each year for children to get outside. We are a passionate, engaged, and knowledgeable community that cares about the outdoors, and protects the outdoor experience for current and future generations.

As a conservation-oriented recreation organization based in Western Washington, we have a strong interest in protecting the resources and experience of Mount Rainier and Olympic National Parks. We regularly conduct trips and courses in the parks, and thousands of our members enjoy recreating in the parks year round. Our members are frequent visitors to these special places, enjoying opportunities for hiking, climbing, backcountry skiing, and snowshoeing. Mountaineers Books has published a number of books on Mount Rainier and Olympic National Parks, including the popular *Day Hiking: Mount Rainier*, *Day Hiking Olympic Peninsula*, *Olympic Mountains Trail Guide*, *Hiking the Wonderland Trail*, and *Mount Rainier: A Climbing Guide*.

Since our founding, we have advocated for the conservation of wild places. Indeed, The Mountaineers advocated for the creation of Olympic National Park in 1938, and for setting aside wilderness areas within Mount Rainier National Park. We advocate for wilderness protection because our members value “opportunities for solitude or a primitive and unconfined type of recreation,” as the Wilderness Act of 1964 states.



For those reasons, we are concerned about the potential loss of natural sounds and quiet in Mount Rainier and Olympic National Parks, as well as the inadequate process being used to solicit public comments on the proposed Air Tour Management Plans (ATMPs). The draft ATMPs fall short of valuing and protecting these wilderness values and do not go far enough to consider 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 above or outside of that immediate airspace.

### **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.

The natural soundscape of a [national] park is defined as: "the combination of all of the natural sounds occurring in the park, absent the human-induced sounds, as well as the physical capacity for transmitting those natural sounds." Experiencing the natural soundscape is a fundamental element of enjoying a national park or forest. This is even more true for visitors to nationally designated wilderness areas.

### **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 Mount 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 in an Environmental Assessment 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.

Thank you for considering our comments. We encourage you 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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