

NATIONAL PARKS CONSERVATION ASSOCIATION®

Protecting Parks for Future Generations®

May 6, 2010

Keith Lusk
Federal Aviation Administration
P.O. Box 92007
Los Angeles, CA 90009-2007
Keith.Lusk@faa.gov

Re: Scoping comments on the Environmental Assessment guiding development of Mount Rainier National Park's Air Tour Management Plan

Dear Keith Lusk:

On behalf of our 320,000 members, the National Parks Conservation Association (NPCA) would like to thank you for the opportunity to provide recommendations to be included in the Environmental Assessment (EA) intended to guide the development of Mount Rainier National Park's Air Tour Management Plan. Our members care deeply for America's shared natural and cultural heritage that is preserved by units of the National Park System such as Mount Rainier National Park.

With over 1.7 million visitors each year, elevations ranging from 1,600 to over 14,000 feet, the resultant richness in biodiversity, thousands of years of cultural history, and more than a quarter million acres of federally designated wilderness—including wilderness that will be directly impacted by this planning process—Mount Rainier is one of the iconic parks in the National Park Service system.

Considering the multiple impacts of this proposed plan to Mount Rainier National Park, NPCA has serious concerns that we feel must be addressed in an EA for the proposed project. Further, NPCA believes the issue is controversial and may have significant impacts to resources and/or visitors' experience. As such a full environmental impact statement (EIS) is mandated.

We have organized our concerns and recommendations into the following categories:

- **Alternatives.** The EA must include a full range of alternatives, and the development of alternatives for this EA must include the recommendations of all stakeholders.

NPCA suggests including at least the following three alternatives in the Environmental Assessment for detailed analysis:

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1. No commercial air tours over the park (consider air tours viewing the mountain from airspace beyond park boundaries).
 2. Commercial air tours capped at the current level of 114 per year, with existing percentages of helicopters and fixed-wing aircraft
 3. Commercial air tours capped at the current level of 114 per year, with stricter limits on helicopter tours as a percentage of total tours
- **Noise.** At 235,625 acres, Mount Rainier is a relatively small park. By comparison, other northwest parks such as North Cascades and Olympic are two and four times larger respectively. Because of the small size concentrating visitors and with nearly half the park in subalpine, alpine or ice environments, air tour noise has the ability to impact large sections of the park, as well as most park visitors. As such, NPCA asks that the EA include alternatives that investigate air tour noise impacts on visitors throughout the entire park.
 - **Wildlife.** Mount Rainier has a mix of ecosystems from inland rainforest to high alpine tundra. The wildlife that lives in these various environments will each react differently to air tours. The times of day and year, and number of tours will also cause unique impacts to park wildlife. The EA must pay particular attention to high elevation wildlife such as the Pika, Marmot and Mountain Goat, as they will bear a disproportionate burden of these impacts.

In addition, the state of Washington is finalizing a plan to recover the gray wolf. Mount Rainier and the nearby Gifford Pinchot national forest are potential recovery areas. The MORA ATMP EA should include discussion of air tour impacts upon gray wolf recovery efforts.

- **Safety** Mount Rainier even in the best weather conditions is a difficult place to fly. Over the past 50 years there have been at least 15 aviation crashes in the park resulting in 68 deaths. Mount Rainier's topography and unpredictable weather challenge even experienced pilots. Military aviation deaths represent roughly half of all park related fatalities. It is possible Mount Rainier may represent the most dangerous park in the Lower 48 to conduct air tours.

The park's topography and weather also make search and rescue operations difficult. In fact one crash site wasn't discovered for nearly 20 years. As such, the ATMP EA must include an investigation of how to protect air tour passengers, the park's general visitors and expected costs of search and rescue efforts.

- **Economics** According to the public scoping packet provided by the NPS and FAA, ATMP alternatives should be "technically and economically feasible." Given the

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unpredictable and difficult weather conditions at Mount Rainier, it's conceivable that available flight days will be small. This small and random operation window makes the profitability of any Mount Rainier air tours highly suspect. We ask the FAA and NPS to consider this fact when drafting alternatives that authorize air tour operations.

- **Wilderness impacts.** As the plan proposed by this EA will directly impact Mount Rainier National Park's federally designated wilderness, we recommend that the FAA and NPS conduct a thorough review of The Wilderness Act of 1964 before preparing this environmental document, as mandated by the National Environmental Policy Act. Air Tours have the potential to significantly impact wilderness values and public enjoyment.
- **Environmental justice.** Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations,"¹ provides that "each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations." Air tours at Mount Rainier, as well as the approach routes to the mountain have the potential to impact both Native American and low income populations. Any MORA ATMP must investigate these impacts.
- **Proximity** As a private pilot who has flown throughout Washington State, I can attest that Mount Rainier is the dominant feature of the state. On clear days, the volcano can be seen from hundreds of miles away. Therefore, it is possible to have an air tour operation that never enters the park proper, yet still provides passengers with stunning and unique views of the mountain. Therefore, we ask the FAA and NPS to draft an alternative that includes air tour operations that operate outside the park.
- **Additional recommendations.** If air tours are authorized in this planning process, NPCA recommends for both safety and environmental reasons that the minimum elevation for all air tour operations be maintained at 5,000 feet above ground level, unless the aircraft is landing. In some places however this will still be roughly 4 to 5 thousand feet below the mountain summit and could significantly impact public enjoyment and wilderness. In addition, because of the risky nature of on ice search and rescue, we'd also ask that any park air tours refrain from flying directly over park glaciers and snowfields.

We also propose that there be a registration and fee system for all commercial aircraft touring Mount Rainier National Park, in order to deal with the increased management necessary for preserving unimpaired the resources of the park in the face of this added challenge to its resources, as well as the additional challenges to ensuring visitor safety

¹ 59 Fed. Reg. 7629 (1994).



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and a high level of visitor experience.

NPCA also supports the consolidation of disparate air tour routes into a more unified and standard route through the national park, if indeed there are air tours authorized in a final plan.

The National Parks Conservation Association looks forward to continued involvement in this environmental process regarding the Mount Rainier Air Tour Management Plan. Please feel free to contact me directly at ssmith@npca.org in order to continue a dialogue to ensure that this proposed plan does not degrade the federally mandated protection of Mount Rainier National Park.

Sincerely,



Sean Smith
Policy Director

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