





Environmental Impact Statement Newsletter

Preliminary Alternatives for Public Comments

April 2011

# Meeting Times and Locations

Volcano
Monday, April 18
5:30-7:30 PM
Hawai'i Volcanoes
National Park

Kīlauea Visitor Center 1 Crater Rim Drive

Pahoa

Tuesday, April 19 5:00 - 7:00 PM

Pahoa Community Center 15-2910 Puna Rd.

Naʻalehu

Wednesday, April 20 5:00 - 7:00 PM

Naʻalehu Community Center 95-5635 Mamalahoa Highway

# Hawai'i Volcanoes National Park Air Tour Management Plan Update

In 2004, the Federal Aviation Administration (FAA) and National Park Service (NPS) asked for your comments on an Air Tour Management Plan (ATMP) Environmental Assessment (EA) related to managing commercial air tour overflights at Hawaiʻi Volcanoes National Park. In 2005, the project was upgraded to an Environmental Impact Statement (EIS). Since 2007, a planning team composed of staff from FAA, NPS, and the Volpe National Transportation Systems Center has been working on preliminary alternatives for air tour operations over the park

# Why has it taken so long?

The planning process has experienced several delays due to differences in FAA and NPS policy and deciding how to best integrate the environmental compliance guidance of both agencies into the air tour management planning (ATMP) process.

Many of you commented during public meetings and in correspondence for both the EA and the EIS scoping efforts. We would like to share our progress on this project over the past several years and encourage your renewed involvement. This newsletter contains a summary of the preliminary alternatives for the Hawai'i Volcanoes National Park ATMP for your review and comment. A description of expected tasks during the upcoming months is also provided, as well as information on additional opportunities for you to provide input. We hope you will join us at one of our open houses to share your ideas and any comments about commercial air tour overflights.

Thank you for your continued interest and involvement in developing an ATMP for Hawai'i Volcanoes National Park.

The purpose of this document is to present preliminary alternatives for the Hawai'i Volcanoes National Park ATMP EIS for public and stakeholder input. It is important to emphasize that final decisions have not been made on any of the alternatives and elements of the alternatives, and no detailed analysis of environmental impacts has been performed yet. After public and stakeholder input are received, the alternatives and elements of the alternatives may be refined, dismissed from further consideration, or new alternatives may be considered. Alternatives that are carried forward will be analyzed in the Draft EIS. As required by the Council on Environmental Quality (CEQ) regulations implementing the National Environmental Policy Act (NEPA), the Draft EIS will be made available for review and public comment.

Under NEPA, alternatives must meet the purpose (i.e., objective) and need for the action. Under the National Parks Air Tour Management Act (NPATMA) of 2000, an ATMP needs to be established "for any national park or tribal land for which such a plan is not in effect whenever a person applies for authority to conduct commercial air tour operation over the park." The objective of an ATMP as defined by NPATMA "shall be to develop acceptable and effective measures to mitigate or prevent the significant adverse impacts, if any, of commercial air tour operations upon the natural and cultural resources, visitor experiences, and tribal lands." According to NPATMA, Commercial air tour operations are defined as any flight conducted for compensation or hire in a powered aircraft, where a purpose of the flight is sightseeing over a national park, within ½-mile outside the boundary of any national park, or over tribal lands during which the aircraft flies below 5,000 feet above ground level (AGL).

# An ATMP will incorporate the following:

- **Reporting requirements** There will be a requirement for commercial air tour operators to provide regular reporting of air tour flights approved under the ATMP.
- FAA airspace authority The FAA has authority for all airspace matters, including any enforcement actions for violations under the ATMP, which will be processed in accordance with existing FAA procedures and regulations.
- Competitive bidding NPATMA states whenever an ATMP limits the number of commercial air tour operations during a specified time frame, a competitive bidding process is triggered. Since the number of flights would be limited for Alternatives 3, 4, and 5, competitive bidding would be required.
- Above Ground Level (AGL) The range of altitudes examined in the alternatives will be from 500 to 5,000 feet AGL. Altitudes for fixed-wing aircraft must be separated by 500 feet above the altitudes listed for helicopters. It is unlawful to operate any aircraft within 1,000 feet AGL of any humpback whale in the vicinity of the Hawaiian Islands.
- Flight Routes and In-flight Deviations The maps included in the preliminary alternatives show general representations of where flights occur, as there is no single line that would represent where all aircraft would fly. The routes represent what will be used for modeling purposes in impact analysis. Pilots may deviate from routes and corridors when necessary due to weather, volcanic activity, or other safety issues.

#### INSTRUCTIONS FOR PUBLIC COMMENT:

Please comment on any alternative and/or alternative element described below. Comments that describe why something will or will not work, or provide new ideas or factual information to correct or adjust assumptions made, as opposed to just expressing like or dislike, are particularly helpful.

#### Alternative 1: No Action, Interim Operating Authority (IOA)

**Objective**: Required by the CEQ and NEPA regulations.

Description: Alternative 1 represents a continuation of what is currently flown and allowed under existing law including, but not limited to, each company's IOA as granted by the FAA (Federal Register, Vol. 70, No. 194, October 7, 2005, page 58778), applicable regulations that govern air safety found at Title 14 Code of Federal Regulations Part 136, Appendix A (formerly Special Federal Aviation Regulation 71), and any FAA deviations issued to individual operators as outlined by the Hawai'i Air Tour Common Procedures Manual (HI Manual). The companies granted IOA for Hawaii Volcanoes National Park include the following 10 helicopter operators: K&S doing business as Tropical Helicopters, Safari Aviation, Sunshine Helicopters, Blue Hawaiian Helicopters, Hawaii Helicopters, Maui Island Air doing business as Volcano Air Tours and Maui Air, Paragon Air, Rainbow Pacific Helicopters, Makani Kai Helicopters, and Manuiwa Airways, Inc., doing business as Volcano Helicopters. The following four fixed wing operators have been granted IOA:Call Air, Big Island Air, Above It All, doing business as Island Hoppers and Mokuele Flight Service. These companies are granted authority to fly up to a total of 28,441 air tours (22,758 helicopter and 5,683 fixed-wing) annually over Hawai'i Volcanoes National Park within a ½-mile buffer of the park boundary below 5,000 feet AGL. The actual number of annual air tours may fluctuate dependent upon demand, but cannot exceed the IOA amount authorized.

Based on fees collected in 2008, the NPS believes that approximately 18,000 helicopter and fixed-wing air tours were flown above the park and within the ½-mile buffer zone. There are no mandatory flight routes or no-fly zones. The actual flight path of air tours can vary due to operator preference, safety considerations, weather conditions, and volcanic activity at the time of the tour. There are temporary, voluntary no-fly periods for events which occur occasionally. The attached map for this alternative shows where commercial operators have indicated that air tour operations are generally known to occur or have historically been flown by operators that have IOA. Operators have been granted deviations to fly below 1,500 feet AGL over Hawaiʻi Volcanoes National Park and within a ½-mile buffer provided they meet certain requirements and limitations set forth by the FAA in the HI Manual. Areas where operators are allowed to fly below 1,500 feet AGL are shown on the maps in the HI Manual.

## **Alternative 2: No Park Air Tours**

**Objective:** Alternative 2 seeks the greatest protection for the purposes, resources, and values of the park including the summits of Kīlauea and Mauna Loa that hold spiritual and cultural significance to Native Hawaiians; threatened and endangered species and other wildlife sensitive to noise; Congressionally-designated wilderness and visitor opportunities for solitude; ground-based visitor experience; Native Hawaiian traditional cultural practices; scenic qualities, and natural sounds.

**Description**: Commercial air tour operations below 5,000 feet AGL within the entire park and within the  $\frac{1}{2}$  mile buffer zone around the park would not be allowed. The park itself is designated as an area to remain free

of commercial air tours under 5,000 feet AGL regardless of future eruptions or lava flows. In this alternative, air tours could still continue to be flown outside the planning area above 5,000 feet AGL and outside the ½-mile buffer. Viewing of lava flows and ocean entry flows outside the planning area is possible.

Based on current air tour activity, routes outside of the park planning area are expected to be similar to existing routes. An unlimited number of air tours originating on Hawaiʻi Island from Hilo, Kailua-Kona, Hapuna and Waikaloa, and airports on Maui and Oahu would still continue to fly outside of the park and ½-mile buffer below 1,500 feet AGL in accordance with the HI Air Tour Common Procedures Manual. The actual flight path of air tours outside the planning area would vary due to operator preference, volcanic activity, and weather conditions at the time of the air tour. The attached map for this alternative shows where commercial operators indicate that air tour flights would most likely occur outside the park and ½-mile buffer and above 5,000 AGL based on currently known flights.

# Alternative 3: Access to Southeast and Southwest Rift Zones; Mitigation Measures and Adaptive Management for Southwest Rift Zone

**Objective:** Alternative 3 examines the impacts of providing multiple air tour route access to historically active volcanic areas of the park with some mitigations and incorporates adaptive management to address the potential for future change.

Description: Commercial air tour operations would fly across the edge of Halema'uma'u Crater and Kīlauea's remote southeast rift to access the Pu'u 'Ō'ō flight zone with west side viewing of Pu'u 'Ō'ō for quiet technology (QT) aircraft only. A flight transit zone for flights from Kailua-Kona Airport and Waikoloa and Hapuna Heliports would cross north of the park parallel to the Mauna Loa Road and continue southeast along Highway 11 toward the Pu'u 'Ō'ō flight zone. Alternatively, flights could proceed from Kīlauea Caldera west-southwest along Highway 11 and out to the coast if a weather route was needed. The Southwest Rift flight zone shown in this area within the park would be considered as an adaptive management strategy for flight concentrations if lava emerges. A coastal flight corridor would also pass inland along the coastal boundary of the park along the park's designated wilderness, both inside and outside of the planning area. No air tours would occur below 5,000 feet AGL in the rest of the planning area. Safety considerations and levels of impacts to resources determined by the analyses would be used to establish appropriate altitudes within the planning area. The attached map shows where commercial air tour operations would fly.

## Alternative elements:

- Caps on numbers of flights allowed annually, and daily:
  - O A range of flight numbers would be analyzed; 10 percent (1,800); 35 percent (6,300); and 60 percent (10,800) of the 2008 flight levels of 18,000 flights.
  - O Daily Caps: Impacts analyses would be used to set daily caps that would potentially limit the number of air tours flown on any one day or the maximum number of flights allowed per day.

#### • Loitering/Circling:

Impacts analyses would be used to set mandatory time limits within Puʻu ʻÕʻō Concentrated Flight Zone e.g., 8-15 minutes allowed for Puʻu ʻŌʻō (east side only, exception on west side for QT aircraft only) and within the Southwest Rift flight zone.

#### • Time of day and day of week restrictions will be analyzed to include the following:

Flights would be allowed on all days except Sunday and Wednesday between the hours of 10:00 a.m. – 4:00 p.m. (exception for QT helicopters noted below).

## • Adaptive Management:

Adaptive management is a systematic approach for improving resource management by learning from management actions or choices. For example, how should the ATMP address changed conditions like a new lava flow in a different area of the park, or if the breeding habitat of a sensitive species has moved to a new area? Alternative 3 would analyze an adaptive management strategy for the following: 1) analyze air tours that utilize quiet technology where there are new lava flows; and 2) analyze curtailing air tours if sensitive species move into an air tour route.

#### • Quiet Technology (QT) and Incentives:

NPATMA requires that the ATMP include incentives for the adoption of QT by air tour operations. Examples include preferred commercial air tour routes and altitudes, and relief from caps and curfews. This alternative would lessen day of week restriction to include flights on Sundays for QT. Time of day restrictions would also increase hours from 9:00 a.m.-5:00 p.m. The PuʻuʻŌʻō route approaching Nāpau wilderness on the west side could only be flown by QT aircraft. Potential cap relief would be subject to impact analysis. After an impact analysis is conducted, an option to allow QT aircraft to fly lower than regular aircraft would be considered. Use of QT would also be examined in competitive bidding.

#### • Interpretive Training and Education:

NPS would provide air tour operators with *mandatory* training regarding park resources, including training on the cultural significance of red lava and other park resources that are important to Native Hawaiians. NPS believes this would provide air tour operators with current and accurate information about park resources that could be shared with their passengers, as well as provide explanations for reasons why air tours are limited in some areas. Training would include the following: 1) annual training class for pilots by NPS in park's natural/cultural resources; 2) brochures developed by NPS to be distributed to air tour passengers.

Education/notification for ground visitors: Park visitors on the ground would be alerted to existence of areas that would most likely be affected by air tours so that they have the option to avoid them.

## • Restrictions for Special Events

This alternative would analyze a mandatory 5-mile standoff for special events limited to the day of the event. These would include the following: 1) Native Hawaiian Cultural Festival; 2) Native Hawaiian Investiture; 3) Other natural and cultural resource programs with two months notice; and 4) Voluntary standoff for events not yet identified.

#### Alternative 4: East Rift Zone Access

**Objective:** This alternative examines the impacts of air tour access on Kīlauea's southeast rift along the Pu'u 'Ō'ō concentrated flight zone, with west-side access across the lower southern edge of Kahuku, on the southwest rift of Mauna Loa. The heart of the park would be free of commercial air tours.

**Description/Characteristics:** Flights would occur within the current Pu'u 'Ō'ō concentrated flight zone historically used by air tours with a modification to exclude viewing on the west side of Pu'u 'Ō'ō Crater. A flight transit corridor would cross the lower south side of the Kahuku Unit and would also pass inland along the coastal boundary of the park along the park's designated wilderness, both inside and outside of the planning area. The attached map for this alternative shows where commercial air tour operations would fly. Safety considerations and levels of impacts to resources determined by the analyses will be used to determine appropriate altitudes within the planning area.

#### **Other Alternative Elements:**

- Caps on numbers of flights allowed annually, and weekly:
  - O This alternative would analyze a range of numbers of flights: 2008 flight levels- 18,000; 60 percent (10,800); 35 percent (6,300) and 10 percent (1,800).
  - Weekly Caps: Set weekly caps limiting the number of flights flown in any week and determine so as not to exceed allowable weekly impacts. This weekly cap would be the maximum number of flights allowed per week.
- **Loitering/Circling:** Not allowed.
- **Time of day and day of week restrictions:** Overflights allowed 9:00 a.m. 5:00 p.m. (exceptions below for QT aircraft). No overflights on Sunday.
- Quiet Technology (QT) and Incentives:

NPATMA requires that the ATMP include incentives for the adoption of QT by air tour operations. This alternative incorporates the following QT incentives:

- Time of day restrictions lessened for quiet technology aircraft:
   8:00 a.m. 5:00 p.m.\*
- O Cap relief: Potential cap relief would be subject to impact analysis, potential altitude relief, and advantage for competitive bidding allowed for QT aircraft to the extent it does not exceed To Be Determined (TBD) impacts threshold. It could be allowed anytime, or only in the event of an eruption (when there may be a greater demand for overflights).

<sup>\*</sup> Afternoon restriction time is not extended due to potential impacts to night flying of Threatened and Endangered bird species leaving their nests.

o Altitude: May allow QT aircraft to fly lower than regular aircraft.

#### • Pilot Interpretive Training and Education:

NPS would provide *voluntary* training for air tour pilots regarding park resources, including information on cultural significance of red lava and park resources to Native Hawaiians. NPS believes this would provide air tour operators with current and accurate information about park resources that could be shared with their passengers, as well as provide explanations for reasons why air tours are limited in some areas. Training would include the following: 1) annual training class for pilots by NPS on the park's natural/cultural resources; 2) brochures developed by NPS to be distributed to air tour passengers.

While the training is voluntary, participation by air tour operators would be one of the factors evaluated in the competitive bidding process.

Education/notification for ground visitors: Park visitors on the ground would be alerted to
existence of areas that would most likely be affected by air tours, so that they have the option to
avoid those areas.

### • Restrictions for Special Events

Voluntary 3-mile standoff for special events which could be impacted by overflights, limited to the day of the event. These include the following: 1) Native Hawaiian Cultural Festival; 2) Native Hawaiian Investiture; 3) Other natural and cultural resource programs with 2 months notice; and 4) Voluntary standoff for events not yet identified.

# Alternative 5: Access to East and Southwest Rift Zones; Limited Mitigation; Incorporates Range of Numbers Including IOA

**Objective:** This alternative examines the impacts of multiple air tour route access to historically active volcanic areas of the park.

Description/Characteristics: Alternative 5 is comprised of commercial air tour routes that would access across the edge of Halema'uma'u Crater and Kīlauea's southwest rift and southeast rift including Pu'u 'Ō'ō with west side viewing of Pu'u 'Ō'ō included. It would also have several routes for west side or circle island air tour operators. A flight transit zone for west side flights from Kailua-Kona Airport, Waikoloa and Hapuna Heliports crosses north of the park parallel to the Mauna Loa Road and continues southeast along Highway 11 toward the Pu'u 'Ō'ō concentrated flight zone. Alternatively, flights could proceed from the Kīlauea Caldera southwest along Highway 11 to the southwest rift concentrated flight zone if red lava were to emerge there, or if a weather route were needed. Flights from Hilo would proceed to and from the Pu'u 'Ō'ō concentrated flight zone from the northeast. A coastal flight corridor also passes inland along the coastal boundary of the park above park wilderness. No air tours below 5,000 feet AGL are allowed in the rest of the planning area. Safety considerations and levels of impacts to resources determined by the analyses will be

used to establish appropriate altitudes within the planning area. The attached map for this alternative shows where commercial air tour operations would fly.

#### Other alternative elements:

- Caps on numbers of flights allowed annually:
  - O This alternative would analyze a range of numbers of flights: IOA at 28,441, 2008 flight levels 18,000; 60 percent (10,800), 35 percent (6,300) and 10 percent (1,800) of 18,000. QT exceptions may also apply and QT aircraft may be allowed additional flights.
- Time of day and day of week restrictions: None, except as provided per existing FAA regulations.
- Loitering/Circling: Impacts analyses would be used to determine the time limit within the zone e.g., 8-15 minutes allowed for Pu'u 'Ō'ō (east side only, exception below for QT aircraft).
- Quiet Technology (QT) and Incentives: This alternative might allow QT aircraft to fly lower than regular aircraft. Potential cap relief for QT is subject to impacts analysis, potential advantage for QT in competitive bidding.
- Pilot Training and Education: None.
- Restrictions for Special Events: None.

# **NEXT STEPS**

The planning team expects to complete the following tasks in the upcoming months:

- Hold open-house public meetings to solicit comments on preliminary alternatives (Comments will be due by June 6, 2011).
- Revise alternatives as needed.
- Complete noise impacts modeling.
- Complete and distribute Draft Environmental Impact Statement (DEIS) for public and agency comment.
- Hold public meetings/hearings to solicit comments on the DEIS.

# **Public Meetings**

Volcano Monday, April 18 5:30-7:30 PM

Hawaiʻi Volcanoes National Park Kilauea Visitor Center 1 Crater Rim Drive

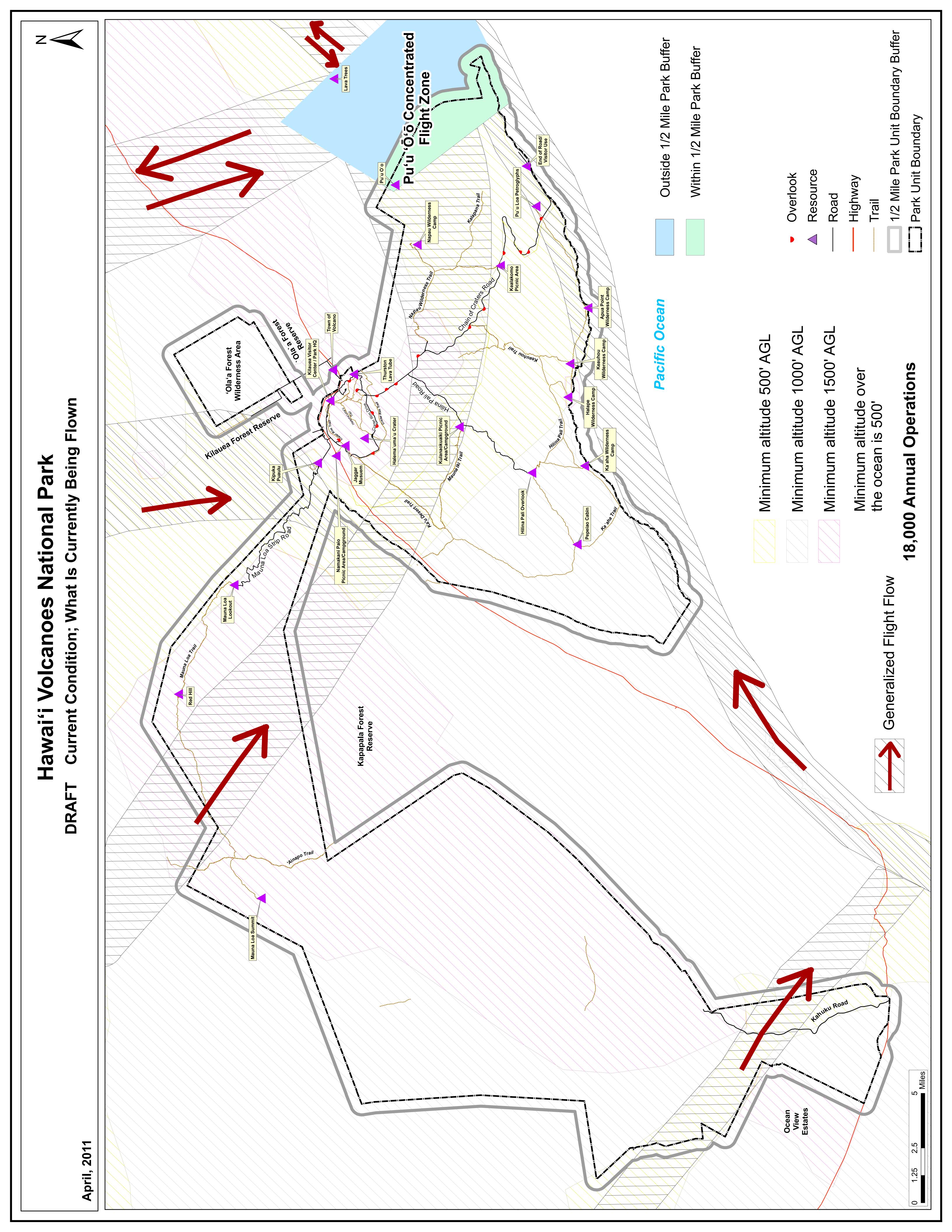
> Pahoa Tuesday, April 19 5:00 - 7:00 PM

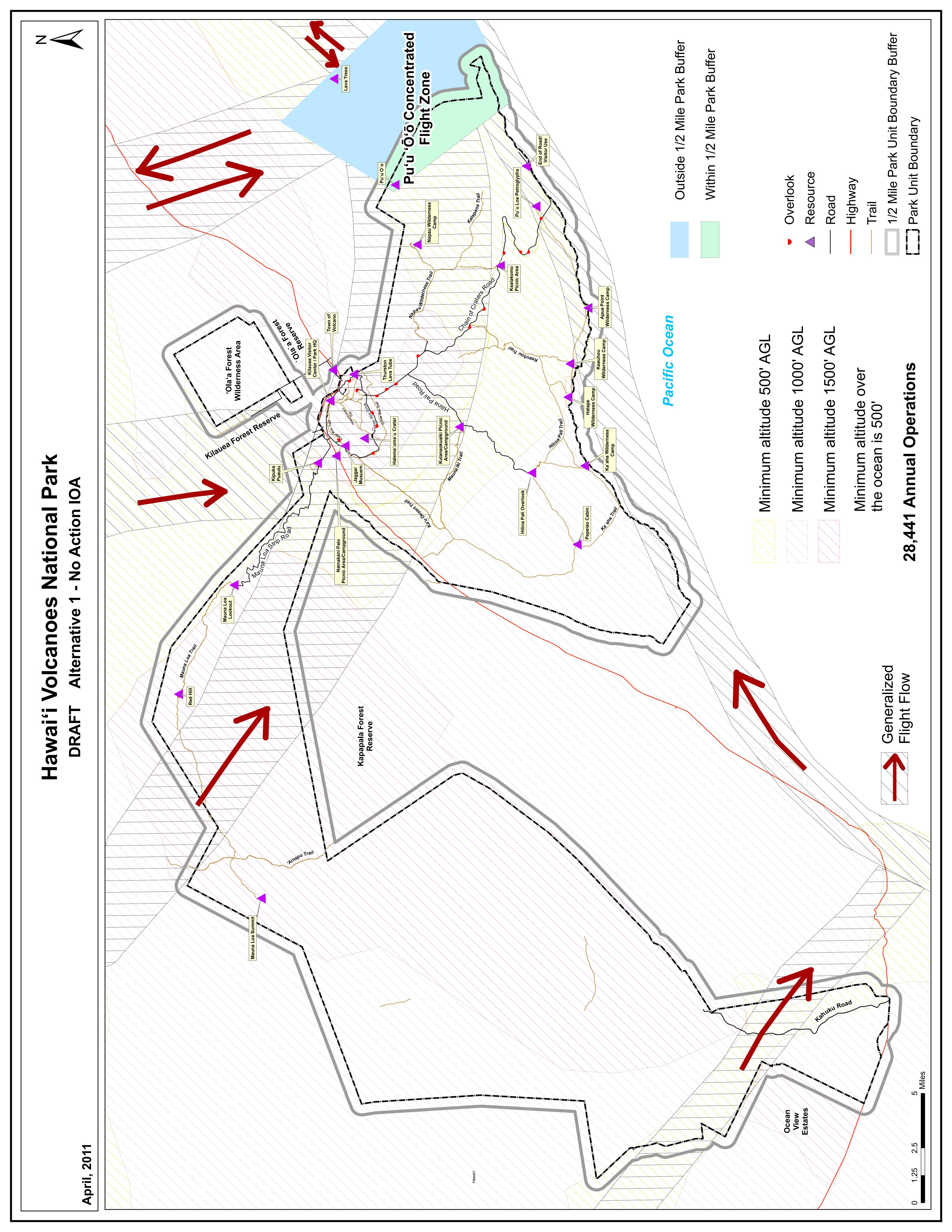
Pahoa Community Center 15-2910 Puna Road

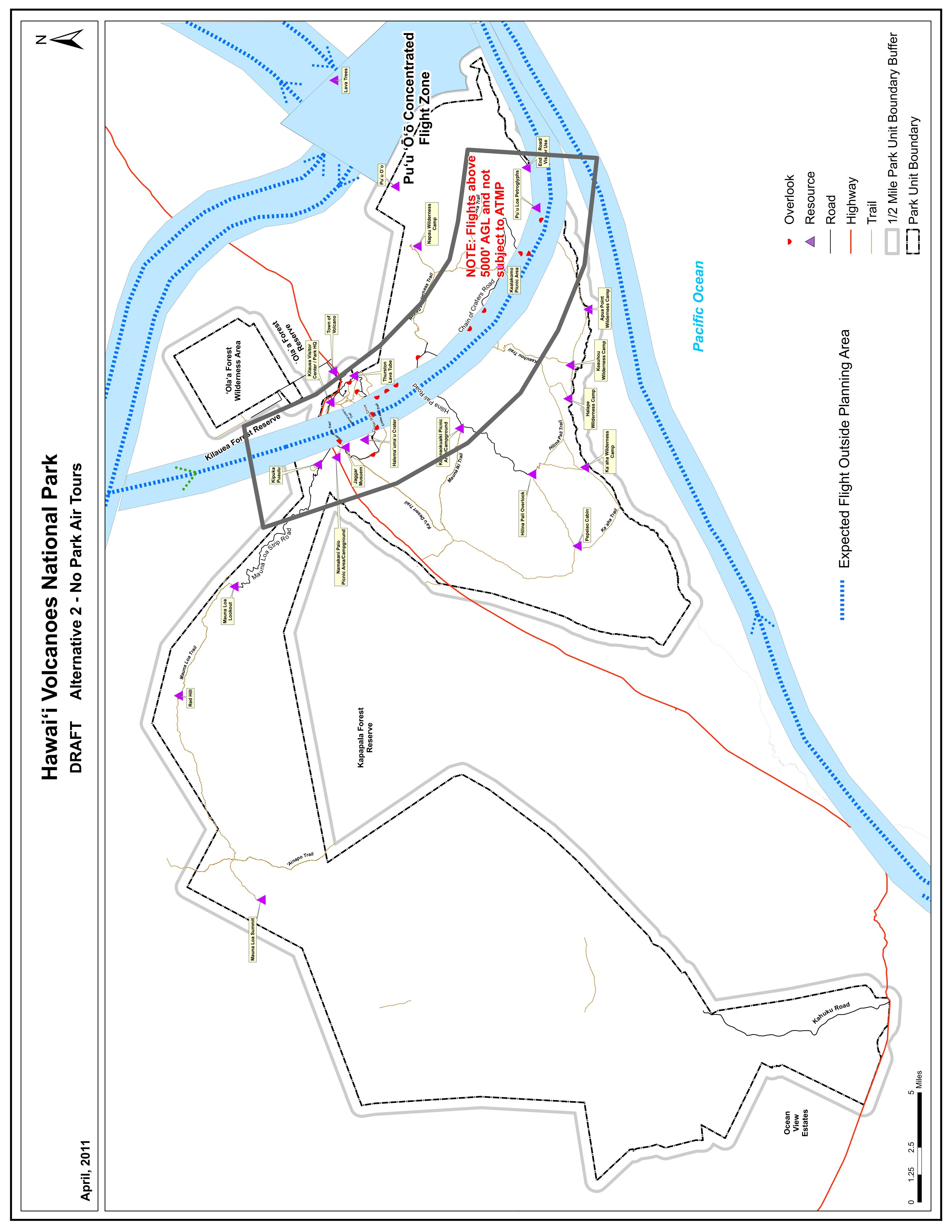
Naʻalehu Wednesday, April 20 5:00 - 7:00 PM

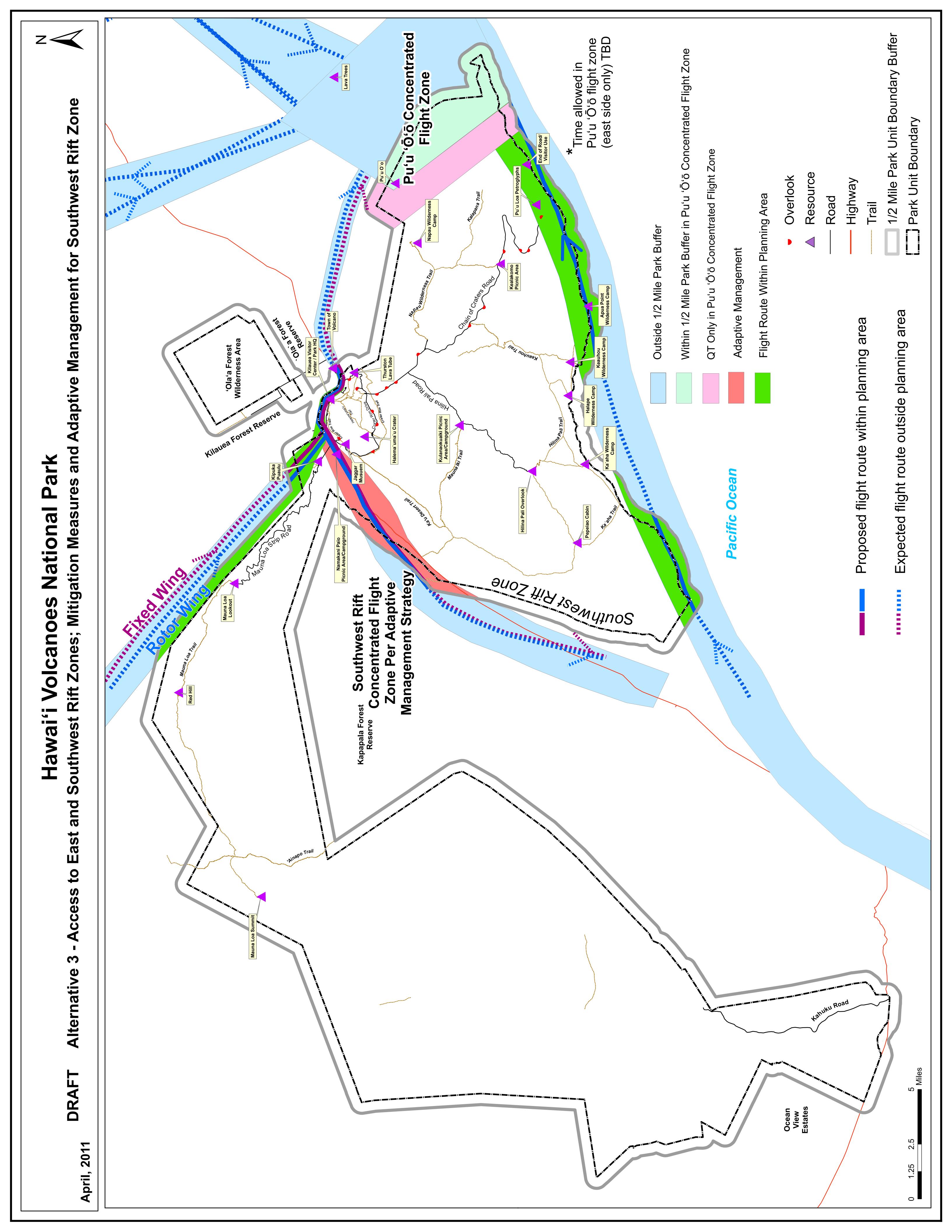
Naʻalehu Community Center 95-5635 Mamalahoa Highway

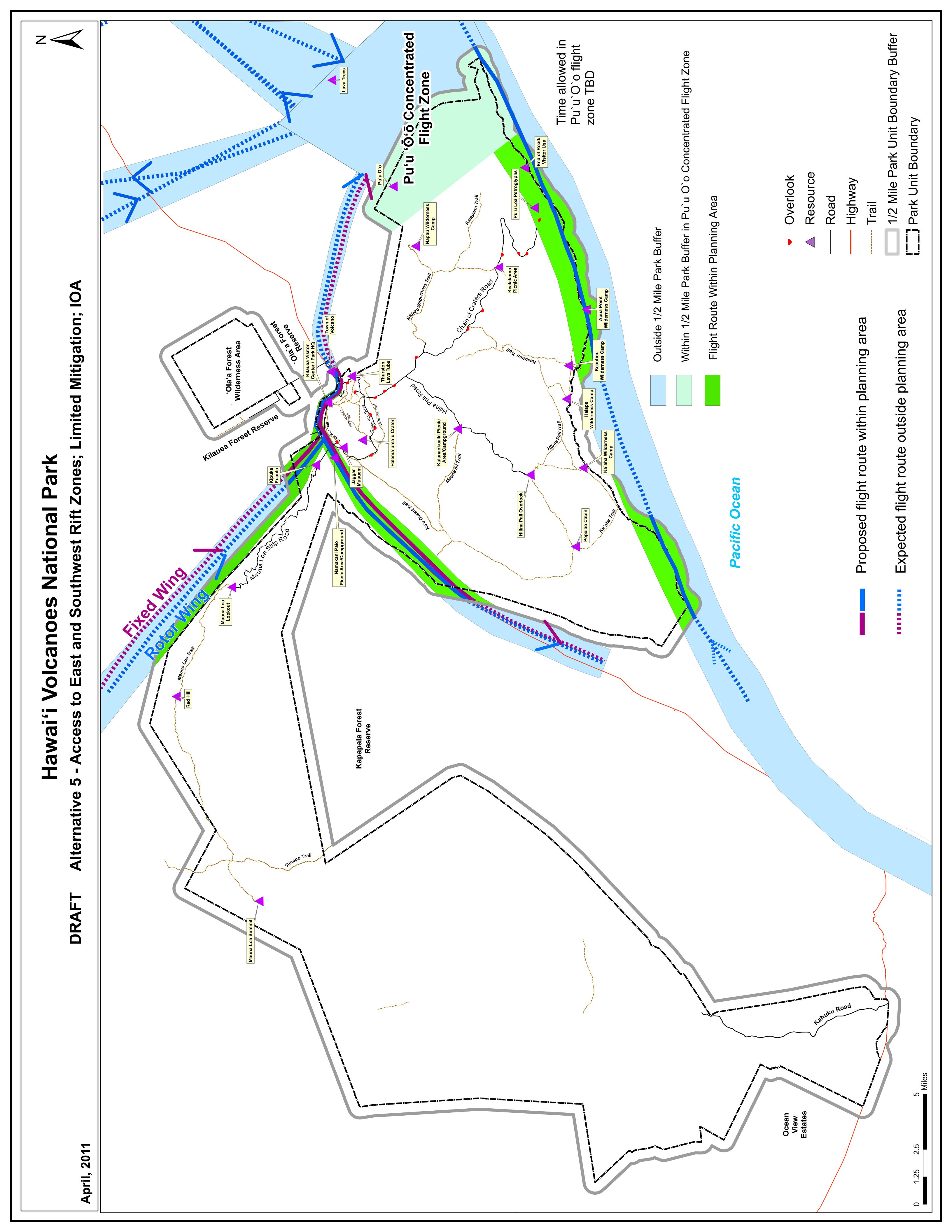
		Prelimir	Preliminary Alternatives		
Alternative	1- No Action IOA	2 – No Park Air Tours	3 -Access to Southeast and Southwest Rift Zones; Mitigation Measures and Adaptive Management for Southwest Rift Zone	4- East Rift Zone Access	5- Access to East and Southwest Rift Zones; Limited Mitigation; Incorporates Range of Numbers Including IOA
General Description	What is currently flown and allowed under existing law	Air tours not allowed below 5000' AGL within the entire park and within the half-mile buffer zone around the park. Air tours could still confinue to be flown outside of this area. Park itself is designated to remain free of commercial air tours below 5,000 AGL regardless of future eruptions or lava flows.	Air tours would fly across the edge of Halemaniuma' Crater and Klauea's southeast rift to access the Pui U' O' flight zone. West side viewing for OT aircraft only. Flight transit zone for lights from Kallua-Kona would cross north of the park parallel to the Mauna Los Road and continue southeast along Highway 11 towards Pu'u O' o' flight zone Flights could also proceed from Klauea Caldera west-southwest along Highway 11 to the coast if a weather route was needed A coastal flight coundor would also pass inland along the coastal boundary of the park. A Southwest Rift flight zone would be considered an adaptive management strategy for flight concentrations if lava emerges in this area.	Air tours would occur within the Pu'u 'Ö' ö flight zone currently floww with a modification to exclude viewing on the west side of Pu'u 'Ö' ö Crater. A flight transit corridor for west-side flights would cross the lower south side of the Kahuku Uhit and would also pass inland along the coastal boundary of the park, both inside and outside of the planning area.	Air four routes would access across the edge of Helaman unau Crater and Klaueas southwest rift and southeast rift including Puu V Ö with west side viewing of Puu V Ö o' included. A flight transit some for flights from Klaulau-Kona crosses north of the park parallel to the Mauna Loa Road and continues southeast along Highway 11 towards the Puu V Ö flight zone. Allightis could proceed from the Klauea Caldera southwest along Highway 11 to a southwest rift flight zone if red lava were to energe there, or if a weather route was needed. A coastal flight cornidor also passes inland along the coastal boundary of the park. No air tours below 5,000 AGL in the rest of the planning area.
Objective	Required by the Council on Environmental Quality and NEPA	Examines the impacts of no air tours in the ATMP planning area.	Examines the impacts of providing multiple air tour route access to historically active volcanic areas of the park with some miligations and incorporates adaptive management to address the potential for future change.	Examines the impacts of air tour access to Kilauea's southeast rift and the Pu'u 'O' o' flight zone, with west-side transit across the lower southern edge of Kahuku, on the southwest rift of Manua Loa. The heart of the park will be free of commercial air tours in designated wildemess and above many cultural and visitor use areas.	Examines the impacts of multiple air tour access to historically active volcanic areas of the park.
Annual Number of Flights	Limited to IOA: Up to 28.441 flights. Current condition existing number of flights within ATMP planning area for 2008: 18.000 flights	None within park or 1/2 mile buffer below 5,000' AGL	Range of numbers based on existing current conditions or 18,000 flights; 60% (10,800), 33% (10,800) and 10% (1,800). This alternative will consider use of daily caps. Quiet technology (QT) exceptions may also apply and QT alteraft may be allowed additional flights.	Range of numbers based on existing current conditions or 18 about playins 50% (1,0800), 38% (6,300) and 10% (1,800) This alternative will consider use of weekly caps. Quiet technology (QT) exceptions may also apply and QT aircraft may be allowed additional flights.	Range of numbers based on IOA - 28,441; existing current conditions of 18,000; 60% (10,800), 35% (6,300), and 10% (1,800) of 18,000.
Number of Operators	Limited to IOA: 11 helicopters and 4 fixed wing operators	Unlimited outside ATMP planning area. None within park or 1/2 mile buffer below 5,000' AGL	To Be Determined (TBD) based on competitive bidding	TBD based on competitive bidding	TBD based on competitive bidding
Routes	Trans-park including Kilauea and Mauna Loa calderas, Kahuku crossing, coastal, Pu'u 'Ô 'ō flight zone (see map)		coa Comidor, edge of Hale ma uma u Highway 11 east to Pu'u 'O'ō flight zone or 11 west and then out to coast on park y for weather route. Southwest Riff flight uild be option if lava emerges in this area b).	Kahuku transit route and Pu'u 'Ö 'ö flight zone and coastal route (see map).	Mauna Loa corridor, Highway 11, Pu'u'O'ō fiight zone and coastal route (see map).
Minimum altitudes	Per HI Air Tour Common Procedures Manual	5,000 ft. AGL over park and within 1/2 mile buffer	500'-5,000' AGL.	500'-5,000' AGL.	500'-5,000' AGL.
Time of Day	Per existing FAA regulations	N/A within ATMP planning area	Overflights allowed 10am-4pm (QT 9am-5pm)	Overflights allowed 9am-5pm (QT 8am-5 pm)	None except as per existing FAA regulations
Day of Week	None	N/A within ATMP planning area	No overflights Sunday (QT exempted) and	No overflights Sunday	None
Loitering/Circling	None	N/A		No Loitering/Circling	TBD based on analyses of various time limits within Pu'u 'Ö 'ö flight zone (east side only, exception below for QT aircraft)
Adaptive Management	None	N/A	May allow air tours where there are new lava flows 2) May curtail air tours if sensitive species move into an air tour route	попе	попе
Quiet Technology Incentives	None	N/A	Potential cap relief subject to impact analysis, route allowed per adaptive management for future red lava areas and west of Pu'u O' o, altitude rellef, relaxed time of day/day of week restrictions, advantage for competitive bidding	Potential cap relief subject to impact analysis for future red lava areas, potential attitude relief and relaxed time of day restrictions, advantage for competitive bidding	Potential cap relief subject to impacts analysis, potential attitude relief and advantage for competitive bidding
Competitive Bidding	N/A	N/A	Required	Required	Required
Pilot Interpretive Training and Education	Not Required	WA	Mandatory for operators, also notification for ground visitors on locations of air tours so they have option to avoid (to be developed by NPS)	Voluntary for operators, factor in competitive bidding, also notification for ground visitors on locations of air tours so they have option to avoid (to be developed by NPS)	None
Restrictions for Particular Events	Voluntary No-fly for special events	N/A	Mandatory 5-mile standoff distance for special events which could be impacted by air four overlights, limited to the day of the event. These include the following: 1) Native Hawaiian Cultural Festival. 2) Native Hawaiian Investiver: 3) other natural and cultural resource programs with two months notice; 4) voluntary standoff for events not yet identified.	Voluntary 3-mile standoff distance for special events which could be impacted by air four overlights, limited to the day of the event. These include: 1) Native Hawaiian (Cultural Festival: 2) Native Hawaiian Investiure; 3) other natural and cultural resource programs with two months notice; 4) voluntary standoff for events not yet identified.	None











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The name or address you have is incorrect; (please change it as indicated below).  Please add my name to the mailing list.  Please remove my name from the mailing list.  Please send me information only by e-mail.	
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Organization, if any:	
Mailing Address:	

Please fold this form in half, showing the preprinted address on the outside, tape it closed (no staples please), and drop in the mail.

City/State/Zip:





# **Comment Form**

We would like to have your thoughts on this issue. After completing your comments, please fold this form in the middle and tape it closed (please no staples).

You may also respond at <a href="http://parkplanning.nps.gov/projectHome.cfm?projectID=36002">http://parkplanning.nps.gov/projectHome.cfm?projectID=36002</a>

Your comments would be most helpful if received no later than JUNE 6, 2011. Thank you.