

Final EA – Additional Appendix Materials

Appendix G – Cultural Resources Consultation and Summary

Concurrence from South Dakota State Historic Preservation Office

Concurrence from Assiniboine and Sioux Tribes of the Fort Peck Indian Reservation

Concurrence from Northern Cheyenne Tribe

Concurrence from Eagle Aviation Inc.

Comment from Turtle Mountain Band of Chippewa Indians



April 13, 2023

Judith Walker
FAA
Federal Preservation Officer
Environmental Policy Division (AEE-400)

SECTION 106 PROJECT CONSULTATION

Project: 221028008F – Air Tour Management Plan for Mount Rushmore National Memorial

Location: Pennington

FAA - Federal Aviation Administration

Dear Judith,

Thank you for the opportunity to comment on the above referenced project pursuant to 54 U.S.C. 306108, also known as Section 106 of the National Historic Preservation Act of 1966 (as amended). The South Dakota Office of the State Historic Preservation Officer (SHPO) concurs with your determination regarding the effect of the proposed undertaking on the non-renewable cultural resources of South Dakota.

On October 28, 2022, the South Dakota Office of the State Historic Preservation Officer (SHPO) received your submission and information titled, "*Continuing Consultation under Section 106 of the National Historic Preservation Act for the development of an Air Tour Management Plan for Mount Rushmore National Memorial*". Your correspondence indicated that the Federal Aviation Administration (FAA) will be the lead agency and is coordinating with the National Park Service (NPS).

At that time, with the provided preliminary information, SHPO had no concerns with the proposed Area of Potential Effect (APE). SHPO recommended that the FAA continues to engage in meaningful consultation with Indian Tribes regarding the delineation of the APE and the identification of historic properties. In specific, properties of religious and cultural significance to Tribes; and the proposed undertaking's effects on historic properties.

On March 20, 2023, additional information was received which included your letter, a list of Consulting Parties, a map of the Area of Potential Effects (APE), a List of Historic Properties in the APE including Historic Characteristics, and a Summary of Noise Technical Analysis from NEPA review.

Based upon the information provided, the proposed undertaking is for the development of an Air Tour Management Plan (ATMP). This ATMP applies to all commercial air tours over the Park and within one-half mile of its boundary, during which the aircraft flies below 5,000 feet above ground level (except solely for the purposes of takeoff or landing, or necessary for safe operation of an aircraft as determined under the rules and regulations of the FAA requiring the pilot-in-command to take action to ensure the safe operation of the aircraft) or less than one miles laterally from any geographic feature within the Park (unless more than 1/2 miles outside the Park boundary).

During consultation, many tribal representatives expressed concern about how the air tours would impact wildlife, plants, and the soundscapes; the latter of which would negatively impact their ability to conduct ceremonies in the area. Therefore, the preferred alternative (Alternative 2: No air tours in the planning





area) was chosen under the National Environmental Policy Act (NEPA). After reviewing the newly-submitted information against our records, the identified Historic Properties within the proposed APE will not be adversely affected by the proposed ATMP (No flights in the planning area). Therefore, SHPO concurs with your determination of "No Adverse Effect" for the proposed undertaking

Changes in the location and/or nature of activities from those identified in your request will require the submission of additional documentation pertaining to the identification of historic properties, as described in 36 C.F.R. § 800.4, and/or the undertaking's effects on historic properties, as described in 36 C.F.R. § 800.11.

Concurrence of the SHPO does not relieve the federal agency official from consulting with other appropriate parties, as described in 36 C.F.R. § 800.2(c). The submitted information indicates that FAA has engaged in meaningful consultation with Indian Tribes, and that the concerns that were expressed over the proposed ATMP influenced Alternative 2 being selected as the preferred alternative. Consultation is an ongoing process, and we anticipate that FAA will continue to engage in meaningful and good-faith consultation with all relevant parties; including Indian Tribes.

If historic properties are discovered or unanticipated effects on historic properties are found after the agency official has completed the Section 106 process, the agency official shall avoid, minimize or mitigate the adverse effects to such properties and notify the SHPO and Indian tribes that might attach religious and cultural significance to the affected property within 48 hours of the discovery, pursuant to 36 C.F.R. § 800.13.

Should you require any additional information, please contact Jozef Lamfers at Jozef.Lamfers@state.sd.us or at 605-773-6004. Your concern for the non-renewable cultural heritage of our state is appreciated.

Sincerely,
Ted M. Spencer
State Historic Preservation Officer

A handwritten signature in black ink that reads "Jozef Lamfers".

Jozef Lamfers
Review & Compliance Archaeologist

C.C.: Shauna Haas - Department of Transportation



Fort Peck Assiniboiné & Sioux Tribes
CULTURAL RESOURCE DEPARTMENT
Tribal Historic Preservation Office | Tribal Museum & Archives

501 Medicine Bear Road | P.O. Box 1027 | Poplar MT, 59255 | Office: 406.768.2382

April 14, 2023

Judith Walker, Federal Preservation Officer
Senior Environmental Policy Analyst
Environmental Policy Division (AEE-400)
Federal Aviation Administration
Ph: 202-267-4185 Em: Judith.Walker@faa.gov

RE: Continuing Consultation and Finding of No Adverse Effect under Section 106 of the National Historic Preservation Act for the development of an Air Tour Management Plan for Mount Rushmore National Memorial

Judith Walker,

Thank you for your request to comment and your time to consult with the Fort Peck Assiniboiné and Sioux Tribes. We appreciate the acknowledgment to our aboriginal homelands. All of which are significant to the history of the Assiniboiné and Sioux tribal members residing on the Fort Peck Indian Reservation.

The laws and policies that protect historic and cultural resources, whether they be at the local, state or federal level, are essential and often the most effective tools to accomplishing historic preservation; yet no other approach is as controversial or misunderstood.

Information is a powerful tool. The most basic, yet critical information for successful preservation activity is the simple identification of historic and cultural resources. If we don't know what exists, how can we preserve it, let alone, use it effectively for the betterment of our communities? With every year, more properties are viewed as historic. Many different property types and architectural styles become acknowledged as significant. T.H.P.O. survey and inventory are an ongoing and constant evolving endeavor. Once a community is aware of the historic resources it has, information on the tools, funding, methods and technologies of preservation become essential.

After careful review of the project consultation efforts, cultural resource significance, traditional cultural landscape recognition and mitigation, the Fort Peck Assiniboiné and Sioux Tribes concur with the Federal Aviation Association, with the findings that there will be no adverse effects to historic properties. It is our understanding that a "no flight plan" has been mitigated amongst the agency, and the Fort Peck Tribes' comments have been recognized through this process.

Concurrence is based on project proposing minimal impacts to previously recorded historical/archaeological sites (historic waterways, wetlands, irrigation canal, tribal cultural properties, and tribal cultural landscapes). If that changes, so will the Tribal Historic Preservation Office's concurrence to this project. All drastic modifications to the project must conduct an on-site visitation with the Tribal Historic Preservation Officer.

For the Fort Peck Tribes, the task of protecting tribal cultural and historical heritage is inherently a challenging one. The challenge is promoting awareness of the importance to preserving an inheritance whose loss is irreversible for precisely the reason that its value is unquantifiable. While preserving sites for our future generations are important, it is also central to our traditional culture that homage and communion practices be understood. We have lost a significant number of traditional practitioners who stood up for preservation while falling short to communicate intangible knowledge over generational lines.

Many features are important to maintaining ceremonial practices of the Fort Peck Tribes in hopes of continuing generational spirituality. Examples of places important to the continuation of traditional survival practices include the special prairie fields from which the Assiniboiné and Sioux gather the materials they need to continue their healing ceremonial traditions, which habitat many animals and plants utilized by both tribes today. We must proactively protect ALL that utilize the cultural landscape for sustenance.

Cultural landscapes have significance that goes far beyond its economic function. Besides providing an income, the project development area constitutes an important part of a traditionalists' everyday life, with high relevance for individual self-esteem, self-image, social connections and inclusion into their religious communities and societies at large. The cultural landscapes are a place in which many tribal folks manifest their religious convictions – or wish to do so.

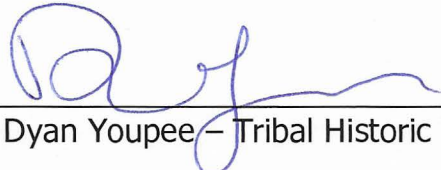
Thank you for your time to consult with the Fort Peck Assiniboiné and Sioux Tribes.

Respectfully,



Mr. Floyd Azure – Tribal Chairman

4/14/2023
Date



Ms. Dyan Youpee – Tribal Historic Preservation Officer

4-14-23
Date

Cc: Sheri Lares – Environmental Protection Specialist, FAA



Northern Cheyenne Tribal Historic Preservation

14 E. Medicine Lodge Drive | P.O. Box 128 | Lance, MT. 59043

Ph: (406) 477- 4838/ 4839/ 8113/ 8114

CONSULTATION REQUEST

CONSULTING AGENCY

US Department of
Transportation- FAA

ADDRESS

CITY/STATE/ZIP

Great Lakes Region

PHONE

701.323-7388

FAX

E-MAIL

sheri.lares@faa.gov

AGENCY CONTACT

Sheri Lares

PROJECT CONTACT

PREPARED BY:

Gary LaFranier

PROJECT TYPE

National Parks Air Tour Management Program

FEDERAL AGENCY

United States Department of Transportation.

STATE / COUNTY

South Dakota

CORRESPONDENCE

DATE RECEIVED REVIEW PERIOD

3/14/2023

30-DAY

DEADLINE

4/14/2023

DOCUMENTATION RECEIVED

MAPS

YES

SURVEY

CLASS III

TRIBAL SURVEY

NO

DETERMINATION

FINDING

NO ADVERSE EFFECT

COMMENT

Your undertaking may proceed as planned

ADDITIONAL COMMENTS

Northern Cheyenne concurs with the findings of No Adverse Effect. Northern Cheyenne also concurs with Alternative 2 No Air Tours in the Planning Area.

Teanna Limpy

Tribal Historic Preservation Officer

4/14/2023

DATE

LITTLEWOLF AND MORNING STAR- Out of Defeat and exile they led us back to Montana and won
our Cheyenne Homeland that we will keep forever

From: [Ray A Jilek](#)
To: [ATMPTeam](#)
Subject: RE: Section 106 Continuing Consultation - Air Tours at Mount Rushmore National Memorial - Eagle Aviation, Inc.
Date: Friday, April 7, 2023 2:42:07 PM

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Ms. Walker:

Eagle Aviation, Inc. concurs with the agencies finding of no significant impact for both Mount Rushmore National Monument and Badlands National Park. Should there be any questions, I can be reached at 605-642-4112. Thanks.

*Ray A. Jilek, President
Eagle Aviation, Inc.
605-642-4112*

From: ATMPTeam [mailto:ATMPTeam@dot.gov]
Sent: Friday, April 07, 2023 6:42 AM
To: rayj@eagleaviationinc.com
Cc: Walker, Judith <FAA> <judith.walker@faa.gov>; Lares, Sheri <FAA> <sheri.lares@faa.gov>
Subject: FW: Section 106 Continuing Consultation – Air Tours at Mount Rushmore National Memorial - Eagle Aviation, Inc.

Hello,

This is a friendly reminder that the FAA sent your office a Section 106 consultation letter for the development of an Air Tour Management Plan (ATMP) for Mount Rushmore National Memorial. On March 14, 2023, the FAA requested your review of the attached letter within 30 days. The 30-day comment period ends on April 14, 2023.

The attached letter describes the undertaking (Alternative 2 – No Air Tours in the Planning Area under the National Environmental Policy Act for the ATMP); the Area of Potential Effects (APE); a description of steps taken to identify historic properties and the characteristics that qualify them for listing in the National Register of Historic Places; and proposes a finding of no adverse effects to historic properties in accordance with 36 CFR 800.5(c). The FAA respectfully requests your concurrence with the proposed finding by April 14, 2023.

Should you seek additional information, please contact me at (202) 267-4185 or Judith.Walker@faa.gov, copying ATMPTeam@dot.gov.

Respectfully,

Judith Walker

From: ATMPTeam <ATMPTeam@dot.gov>

Sent: Tuesday, March 14, 2023 1:31 PM

To: rayj@eagleaviationinc.com

Cc: Ohms, Rene E <rene_ohms@nps.gov>; Beeco, Adam A <adam_beeco@nps.gov>; Lares, Sheri <FAA> <sheri.lares@faa.gov>; Walker, Judith <FAA> <judith.walker@faa.gov>; Papazian, Jennifer (Volpe) <Jennifer.Papazian@dot.gov>; Hanchera, Shelby (Volpe) <Shelby.Hanchera@dot.gov>; Haas, Shauna (Volpe) <shauna.haas@dot.gov>; Kathy_Boden@nps.gov

Subject: Section 106 Continuing Consultation – Air Tours at Mount Rushmore National Memorial - Eagle Aviation, Inc.

Dear Eagle Aviation:

The Federal Aviation Administration (FAA) and the National Park Service (NPS) are continuing Section 106 consultation with your office for the development of an Air Tour Management Plan (ATMP) for Mount Rushmore National Memorial. FAA is the lead federal agency for compliance with the Section 106 consultation for this undertaking.

The attached letter describes the preferred alternative under the National Environmental Policy Act for the ATMP, which is the proposed undertaking; the Area of Potential Effects (APE); a description of steps taken to identify historic properties and the characteristics that qualify them for listing in the National Register of Historic Places; and proposes a finding of no adverse effects to historic properties in accordance with 36 CFR 800.5(c). The FAA and NPS respectfully request your concurrence with the proposed finding within thirty days.

Should you seek additional information about any of the above, please contact me at (202) 267–4185 or Judith.Walker@faa.gov, copying ATMPTeam@dot.gov.

Thank you for your time and consideration.

Best Regards,
Judith Walker

From: [Larus Longie](#)
To: [ATMPTeam](#)
Subject: RE: Section 106 Continuing Consultation - Air Tours at Mount Rushmore National Memorial – Turtle Mountain Band of Chippewa Indians of North Dakota
Date: Thursday, March 16, 2023 10:32:11 AM

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I Larus Longie TMBCI THPO concur with the local THPO and people of the APE that know of the history, culture of the area in question.

From: ATMPTeam <ATMPTeam@dot.gov>
Sent: Tuesday, November 1, 2022 1:37 PM
To: Jamie S. Azure <jamie.azure@tmbci.org>
Cc: Larus Longie <larus.longie@tmbci.org>; FireCloud, Dorothy L <Dorothy_FireCloud@nps.gov>; LeBeau, Albert <Albert_LeBeau@nps.gov>; kathy_boden@nps.gov; rene_ohms@nps.gov; adam_beeco@nps.gov; Walker, Judith <FAA> <judith.walker@faa.gov>; Papazian, Jennifer (Volpe) <Jennifer.Papazian@dot.gov>; Hanchera, Shelby (Volpe) <Shelby.Hanchera@dot.gov>; Haas, Shauna (Volpe) <shauna.haas@dot.gov>; Lares, Sheri <FAA> <sheri.lares@faa.gov>
Subject: Section 106 Continuing Consultation - Air Tours at Mount Rushmore National Memorial – Turtle Mountain Band of Chippewa Indians of North Dakota

Dear Chairman Azure:

We are resending this correspondence to include Tribal Historic Preservation Officer Larus Longie.

The Federal Aviation Administration (FAA) and the National Park Service (NPS) are continuing Section 106 consultations with your office for the development of an Air Tour Management Plan (ATMP) at Mount Rushmore National Monument. FAA is acting as the lead federal agency for purposes of complying with Section 106 for this undertaking.

We are providing the attached letter to describe the undertaking in accordance with 36 CFR 800.3(a) and 800.16(y) and present our proposed APE pursuant to 36 CFR 800.4(a)(1). FAA has also completed its initial historic property identification in accordance with 36 CFR 800.4 and requests your assistance in identifying additional historic properties that may be located within the proposed APE.

Please let us know if you have any comments regarding our proposed APE and initial historic property identification efforts.

Should you would wish additional information about any of the above, please contact Judith Walker at Judith.Walker@faa.gov or 202-267-4185 and copy the ATMP team at ATMPTeam@dot.gov.

Thank you for your time and consideration.

Best Regards,
Judith Walker

Final EA – Additional Appendix Materials

Appendix I – Section 4(f) Analysis

Official with Jurisdiction Letter to U.S. Forest Service



U.S. Department
of Transportation
**Federal Aviation
Administration**

United States Department of Transportation
FEDERAL AVIATION ADMINISTRATION
Office of Policy, International Affairs & Environment
Office of Environment and Energy

NATIONAL PARKS AIR TOUR MANAGEMENT PROGRAM

April 24, 2023

Re: Consultation under Section 4(f) of the U.S. Department of Transportation Act (49 U.S.C. § 303) for the development of an Air Tour Management Plan for Mount Rushmore National Memorial

Jeff Tomac
U.S. Forest Service
1019 N. 5th Street
Custer, SD 57730

Dear Jeff Tomac:

The Federal Aviation Administration (FAA), in cooperation with the National Park Service (NPS) (collectively, the agencies), are developing an Air Tour Management Plan (ATMP) for the Mount Rushmore National Memorial (Park). The FAA is preparing documentation for the ATMP in accordance with the National Parks Air Tour Management Act of 2000 (the Act) and other applicable laws, including Section 4(f) of the U.S. Department of Transportation (DOT) Act (Section 4(f)). The purpose of this letter is to coordinate with you on FAA's preliminary findings related to the ATMP's potential impacts to the Black Hills National Forest and Norbeck Wildlife Preserve National Game Refuge, which are protected properties under Section 4(f).

Project Background and Purpose of the Action

The Act (Public Law 106-181, codified at 49 U.S.C. § 40128), directs the agencies to develop ATMPs for commercial air tour operations over units of the National Park System. A commercial air tour operation is defined as "a flight conducted for compensation or hire in a powered aircraft where the purpose of the flight is sightseeing over a National Park, within ½ mile outside the boundary of a National Park or over tribal lands, during which the aircraft flies below an altitude of 5,000 feet (ft.) above ground level (AGL) or less than 1 mile laterally from any geographic feature within the Park (unless more than ½ mile outside the boundary)." When the Act was passed in 2000, existing air tour operators were permitted to continue air tour operations in parks until an ATMP was completed. To facilitate this continued use, FAA issued Interim Operating Authority (IOA) to existing air tour operators. IOA set an annual limit of the number of flights per operator for each park. In 2012, the Act was amended by Congress to, among other things, require operators to report the number of flights conducted on a quarterly interval each year. On February 14, 2019, Public Employees for Environmental Responsibility and the Hawai'i Coalition Malama Pono filed a petition in the United States Court of Appeals for the District of Columbia Circuit Court for the agencies to complete ATMPs or voluntary agreements at seven specified Parks, In re Public Employees for Environmental Responsibility, et al., Case No. 19-1044 (D.C. Cir.). On May 1, 2020,

the Court granted the petition and ordered the agencies to submit a schedule to bring 23 eligible parks, including Mount Rushmore National Memorial, into compliance with the Act within two years or to show specific, concrete reasons why doing so will take longer. Consistent with the Court's order, agencies submitted a proposed plan and schedule (Compliance Plan) on August 31, 2020. On June 21, 2022, the Court ordered the agencies to file a joint supplemental report and propose firm deadlines for bringing each of the parks included in the Compliance Plan into compliance with the Act. On July 21, 2022, the agencies filed their report and provided a deadline of December 31, 2023, to complete the ATMP for the Park.

Section 4(f) is applicable to historic sites and publicly owned parks, recreation areas, and wildlife and waterfowl refuges of national, State, or local significance that may be impacted by transportation programs or projects carried out by the U.S. Department of Transportation (USDOT) and its operating administrations, including the FAA. Section 4(f) of the Department of Transportation Act (codified at 49 U.S.C. § 303(c)), states that, subject to exceptions for *de minimis* impacts:

“... the Secretary may approve a transportation program or project...requiring the use of publicly owned land of a public park, recreation area, or wildlife and waterfowl refuge of national, State, or local significance, or land of an historic site of national, State, or local significance (as determined by the Federal, State, or local officials having jurisdiction over the park, area, refuge, or site) only if –

1. There is no prudent and feasible alternative to using that land; and
2. The program or project includes all possible planning to minimize harm to the park, recreation area, wildlife and waterfowl refuge, or historic site resulting from the use.”

The term “use” refers to both physical and constructive impacts to Section 4(f) resources. A physical use involves the physical occupation or alteration of a Section 4(f) resource, while constructive use occurs when a proposed action results in substantial impairment of a resource to the degree that the activities, features, or attributes of the resource that contribute to its significance or enjoyment are substantially diminished. Under the ATMP, potential impacts to Section 4(f) resources from commercial air tours may include noise from aircraft within the acoustic environment, as well as visual impacts.

Description of the Proposed Action

In accordance with the Act, the agencies are developing an ATMP at the Park. Commercial air tours have been operating intermittently over the Park for over 20 years. Since 2005, these air tours have been conducted pursuant to IOA issued by FAA in accordance with the Act. IOA does not provide any operating conditions (e.g., routes, altitudes, time of day, etc.) for air tours other than a limit of 5,608 air tours per year. The ATMP will replace IOA.

The agencies have documented the existing conditions for commercial air tour operations at the Park. The FAA and the NPS consider the existing operations for commercial air tours to be an average of 2017-2019 annual air tours flown, which is 3,914 flights. The agencies decided to use a three-year average because it reflects the most accurate and reliable air tour conditions based on available operator reporting, and accounts for variations across multiple years, excluding more recent years affected by the COVID-19 pandemic.

The proposed action is implementing the ATMP at the Park. The ATMP will prescribe operating parameters to mitigate impacts from commercial air tours on Park resources. The agencies considered

three alternatives for the Park's ATMP. The alternatives considered include: Alternative 1 which serves as the No Action; Alternative 2, which is identified as the Preferred Alternative and would prohibit air tours within the ATMP planning area;¹ Alternative 3 which would permit an approximate 7% reduction of air tours compared to existing conditions with additional operational modifications in the ATMP planning area; and Alternative 4 which would permit an approximate 81% reduction of air tours compared to existing conditions with additional operational modifications within the ATMP planning area. In accordance with FAA Order 1050.1F, the FAA determined through an initial assessment if the proposed action and alternatives would result in use of any of the properties to which Section 4(f) applies. The No Action Alternative provides a basis for comparison but is not considered a selectable alternative because it does not meet the purpose and need for the ATMP. Furthermore, the FAA consulted with the NPS on the potential for substantial impairment to Section 4(f) resources that would occur under the No Action Alternative, and the NPS determined that the No Action Alternative cannot be mitigated to avoid or prevent unacceptable impacts to the Park's natural and cultural resources and visitor experience. The FAA did not advance the No Action Alternative for detailed Section 4(f) analysis as the NPS does not consider it a selectable alternative. Detailed analysis of Section 4(f) resources is provided below for the Preferred Alternative. Detailed analysis of Section 4(f) resources under Alternatives 3 and 4 is included in **Attachments B** and **C**.

The following elements of the ATMP are included for the Park under the Preferred Alternative:

- Prohibits air tours within the ATMP planning area to maximize Park resource protection. Air tours could continue to fly outside the ATMP planning area (i.e., at or above 5,000 ft. AGL or more than ½-mile outside of the Park's boundary), see **Attachment A**;
- There are no designated routes or altitudes prescribed in **Attachment A**, however, operators may continue to fly to points of interest in the area outside of the ATMP planning area where they already fly, fly around the ATMP planning area similar to existing flights, or above the ATMP planning area (above at or 5,000 ft. AGL); and
- The establishment of the ATMP would result in the termination of IOA for the operators.

The agencies are both responsible for monitoring and oversight of the ATMP.

Section 4(f)

The study area for considering Section 4(f) resources for the ATMP consists of the Park and ½-mile outside the boundary of the Park (ATMP planning area) plus a two-mile buffer around this area. The Section 4(f) study area corresponds with the Area of Potential Effects (APE) used for compliance with Section 106 of the National Historic Preservation Act (NHPA) of 1966 (Section 106) for the Park. See **Attachment A** for a depiction of the Section 4(f) study area. Historic properties were identified as part of the Section 106 consultation process. Parks, recreational areas, and wildlife and waterfowl refuges were identified using public datasets from federal, state, and local sources, which included the U.S. Forest Service. Each resource that intersected the Section 4(f) study area (i.e., some portion of the property fell within the one and ½ mile buffer around the Park) was included in the Section 4(f) analysis.

¹ An ATMP regulates commercial air tours over a national park or within ½-mile outside the park's boundary during which the aircraft flies below 5,000 ft. AGL. This is referred to as the ATMP planning area.

Potential Use of Section 4(f) Resources

Evaluating potential impacts to Section 4(f) resources focuses on changes in aircraft noise exposure and visual effects resulting from implementing the ATMP. A constructive use of a Section 4(f) resource would occur if there was a substantial impairment of the resource to the degree that the activities, features, or attributes of the site that contribute to its significance or enjoyment are substantially diminished. This could occur as a result of both visual and noise impacts. The FAA evaluated the Section 4(f) resources for potential noise (including vibration) and visual impacts to determine if there was substantial impairment to Section 4(f) resources due to the ATMP that might result in a constructive use.

Noise Impacts Analysis

The FAA's noise evaluation is based on Day Night Average Sound Level Average Annual Day (Ldn or DNL), the cumulative noise energy exposure from aircraft. As part of the ATMP noise analysis, the NPS provided supplemental metrics to assess the impact of commercial air tours on visitor experience in quiet settings, including noise sensitive areas of Section 4(f) resources. The metrics and acoustical terminology considered for the Section 4(f) noise analysis are shown in the table below.

Metric	Relevance and citation
Equivalent sound level, $L_{Aeq, 12\text{ hr}}$	The logarithmic average of commercial air tour sound levels, in dBA ² , over a 12-hour day. The selected 12-hour period is 7 AM to 7 PM to represent typical daytime commercial air tour operating hours.
Day-night average sound level, L_{dn} (or DNL)	<p>The logarithmic average of sound levels, in dBA, over a 24-hour day, DNL takes into account the increased sensitivity to noise at night by including a 10 dB penalty on noise events occurring between 10 PM and 7 AM local time.</p> <p>Note: Both $L_{Aeq, 12\text{ hr}}$ and DNL characterize:</p> <ul style="list-style-type: none">Increases in both the loudness and duration of noise eventsThe number of noise events during specific time period (12 hours for $L_{Aeq, 12\text{ hr}}$ and 24-hours for DNL) <p>If there are no nighttime events, then $L_{Aeq, 12\text{ hr}}$ is arithmetically three dBA higher than DNL as the events are averaged over 24 hours instead of 12 hours.</p> <p>The FAA's (2015, Exhibit 4-1) indicators of significant impacts are for an action that would increase noise by DNL 1.5 dB or more for a noise sensitive area that is</p>

² dBA (A-weighted decibels): Sound is measured on a logarithmic scale relative to the reference sound pressure for atmospheric sources, 20 μPa . The logarithmic scale is a useful way to express the wide range of sound pressures perceived by the human ear. Sound levels are reported in units of decibels (dB) (ANSI S1.1-1994, American National Standard Acoustical Terminology). A-weighting is applied to sound levels in order to account for the sensitivity of the human ear (ANSI S1.42-2001, Design Response of Weighting Networks for Acoustical Measurements). To approximate human hearing sensitivity, A-weighting discounts sounds below 1 kHz and above 6 kHz.

	exposed to noise at or above the DNL 65 dB noise exposure level, or that will be exposed at or above the DNL 65 dB level due to a DNL 1.5 dB or greater increase, when compared to the No Action Alternative (existing conditions) for the same timeframe.
Time Audible Natural Ambient	<p>The total time (minutes) that aircraft noise levels are audible to an attentive listener with normal hearing under natural ambient conditions.</p> <p>The natural ambient is the sound level exceeded 50 percent of the time L_{50}, determined from the natural sound conditions found in a ATMP planning area, including all sounds of nature (i.e., wind, streams, wildlife, etc.), and excluding all human and mechanical sounds. Time audible does not indicate how loud the event is, only if it might be heard.</p>
Time Above 35 dBA	<p>The amount of time (in minutes) that aircraft sound levels are above a given threshold (i.e., 35 dBA).</p> <p>In quiet settings, outdoor sound levels exceeding this level degrade experience in outdoor performance venues (American National Standards Institute (ANSI), 2007)³; blood pressure increases in sleeping humans (Haralabidis et al., 2008)⁴; maximum background noise level inside classrooms (ANSI/Acoustical Society of America S12.60/Part 1-2010).⁵</p>
Time Above 52 dBA	<p>The amount of time (in minutes) that aircraft sound levels are above a given threshold (i.e., 52 dBA).</p> <p>At this background sound level, normal voice communication at five meters (two people five meters apart), or a raised voice to an audience at ten meters would result in 95% sentence intelligibility (United States Environmental Protection Agency, Office of Noise Abatement and Control, 1974)⁶. This metric represents the level at which one may reasonably expect interference with Park interpretive</p>

³ American National Standards Institute, Inc. (2007). Quantities and procedures for description and measurement of environmental sound — Part 5: Sound level descriptors for determination of compatible land use. ANSI/ASA S12.9-2007/PART 5 (R2020), 1-20. <https://webstore.ansi.org/Standards/ASA/ANSIASAS122007PartR2020>.

⁴ Haralabidis A.S., Dimakopoulou, K., Vigna-Taglianti, F., Giampaolo, M., Borgini, A., Dudley, M., & Jarup, L. (2008). Acute effects of night-time noise exposure on blood pressure in populations living near airports. European Heart Journal Advance Access. <https://academic.oup.com/eurheartj/article/29/5/658/440015>.

⁵ American National Standards Institute, Inc. (2002). Acoustical performance criteria, design requirements, and guidelines for schools, Part 1: Permanent schools. Acoustical Society of America, ANSI/ASA S12.60-2002/Part 1. <https://webstore.ansi.org/Standards/ASA/ANSIASAS1260Part2010R2020>.

⁶ United States Environmental Protection Agency, Office of Noise Abatement and Control. (1974). Information on levels of environmental noise requisite to protect public health and welfare with an adequate margin of safety. NPC Online Library, 550/9-74-004, 1-78. <https://www.nrc.gov/docs/ML1224/ML12241A393.pdf>.

	programs, activities that require communication from a distance and other general visitor communication.
Maximum sound level, L_{\max}	The loudest sound level, in dBA, generated by the loudest event; it is event-based and is independent of the number of operations. L_{\max} does not provide any context of frequency, duration, or timing of exposure.

Under the Preferred Alternative, commercial air tours would not be conducted within the ATMP planning area which would reduce this source of noise originating from within the Section 4(f) study area. The acoustic impacts of Preferred Alternative cannot be modeled because, although some speculation about air tour routes can be made, it is unknown where air tours would fly when outside the ATMP planning area, so data on the resultant DNL for this alternative is not available. The Preferred Alternative would provide 365 days per year without air tours within the ATMP planning area and would reduce noise at Section 4(f) resources.

Since commercial air tour operations would be limited or prohibited within the ATMP planning area under Alternatives 2, 3, and 4, these alternatives could result in the displacement of tours outside of this area. The indirect effects analysis conducted for the EA indicates that it is highly unlikely that the air tours that are displaced to outside the ATMP planning area under Alternatives 2, 3, and 4 would generate a noise exposure level at or above DNL 65 dB in a single location in accordance with FAA Order 1050.1F, including those that overlap with Section 4(f) properties. Additionally, the FAA and the NPS are unable to predict with specificity if, where, and to what extent any displaced air tours would result in visual impacts in different and/or new areas, including Section 4(f) resources.

The FAA also considered the potential for vibrational effects on Section 4(f) resources under the Preferred Alternative. However, since the Preferred Alternative would not authorize commercial air tours to be conducted within the ATMP planning area, vibrational effects would not occur and there would be no constructive use from vibrational effects of Section 4(f) resources.

As a result, FAA concludes there would be no substantial impairment of Section 4(f) resources in the Section 4(f) study area from noise-related or vibrational effects caused by the implementation of the Preferred Alternative, which does not allow air tours in the ATMP planning area.

Visual Impacts Analysis

Recognizing that some types of Section 4(f) resources may be affected by visual effects of commercial air tours, the FAA and NPS considered the potential for the introduction of visual elements that could substantially diminish the significance or enjoyment of Section 4(f) resources in the study area. Since the Preferred Alternative would not authorize air tours within the ATMP planning area, visual effects would not occur and there would be no constructive use of Section 4(f) resources due to visual effects.

The indirect effects analysis for visual effects identifies that some indirect visual impacts could occur if flights were displaced to outside the ATMP planning area. Air tour operators would likely continue to fly to points of interest outside of the ATMP planning area elsewhere in the region, such as Crazy Horse Monument, Iron Mountain Road, Horsethief Lake, Black Elk Peak, and Sylvan Lake, or would conduct tours just outside of the perimeter of the ATMP planning area since the sculpture would still be visible

from this area. Section 4(f) resources are present in these areas and could experience visual effects if air tours were visible from those resources. However, the FAA and the NPS are unable to predict with specificity if, where, and to what extent any displaced air tours would result in visual impacts in different and/or new areas, including Section 4(f) resources.

Preliminary Finding

The FAA has preliminarily determined the Preferred Alternative would not substantially diminish the protected activities, features, or attributes of the Section 4(f) resources in the Section 4(f) study area. The Preferred Alternative would not result in substantial impairment of Section 4(f) resources; therefore, based on the analysis above, FAA intends to make a determination of no constructive use of the Black Hills National Forest and Norbeck Wildlife Preserve National Game Refuge. We request that you review this information and respond with any concerns or need for further consultation on the FAA's preliminary proposed no substantial impairment finding within fourteen days of receiving this letter.

Should you have any questions regarding any of the above, please contact Eric Elmore at 202-267-8335 or eric.elmore@faa.gov and copy the ATMP team at ATMPTeam@dot.gov.

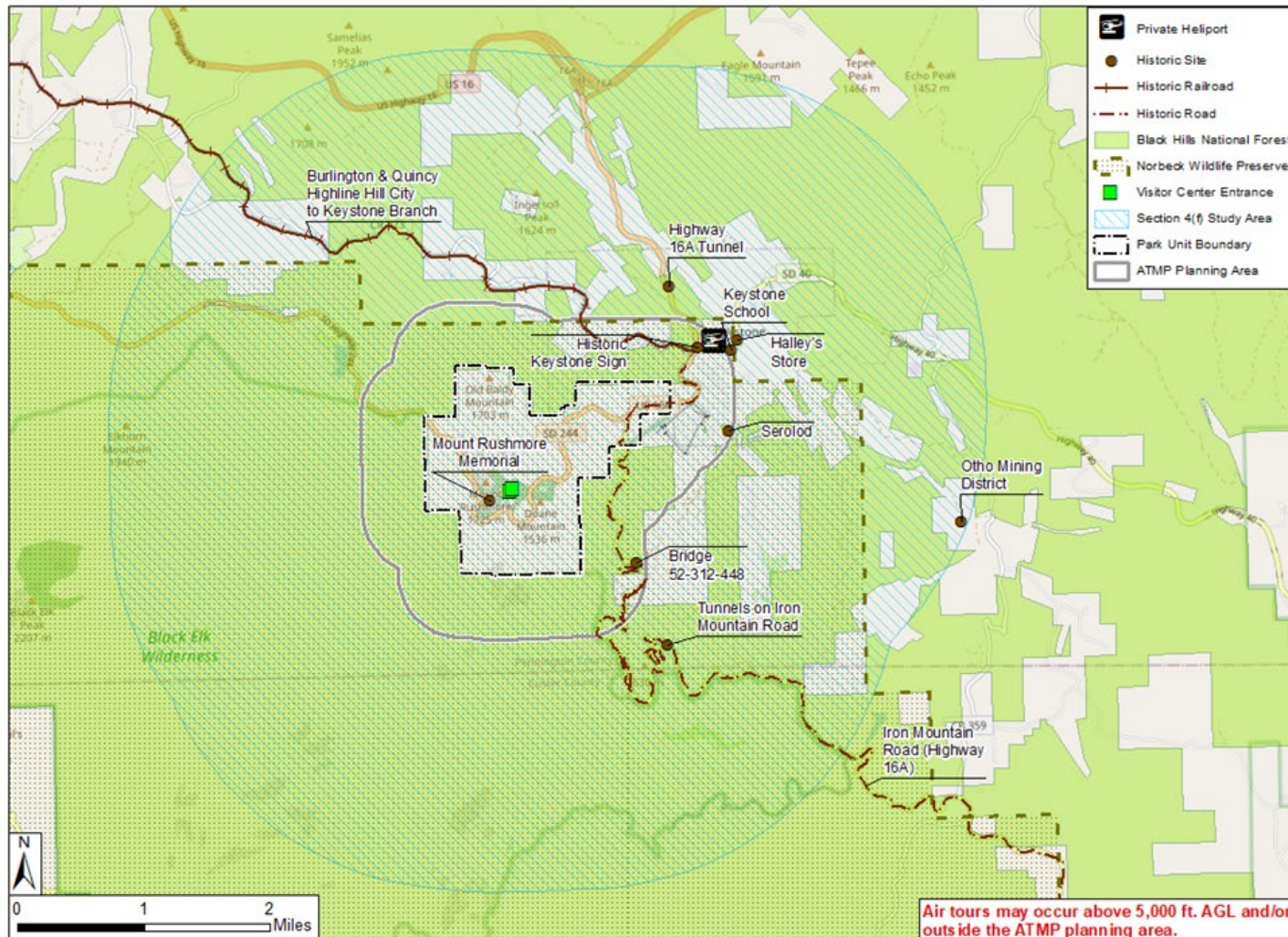
Sincerely,

Eric Elmore
Senior Policy Advisor
Office of Environment and Energy
Federal Aviation Administration

Attachments

- A. Map including proposed Commercial Air Tour Routes, Section 4(f) Section 4(f) study area, and Section 4(f) Resources
- B. Detailed Section 4(f) analysis for Alternatives 3 and 4
- C. Section 4(f) location point analysis for Alternatives 3 and 4

Map of Section 4(f) Section 4(f) study area and Section 4(f) Resources



ATTACHMENT B

Detailed Section 4(f) Analysis for Alternatives 3 and 4

Noise Impacts Analysis

The FAA developed a detailed Section 4(f) analysis for Alternatives 3 and 4 to understand the potential impact to Section 4(f) resources under these alternatives. For aviation noise analyses under the National Environmental Policy Act (NEPA), the FAA determines the cumulative noise energy exposure of individuals resulting from aviation activities in terms of the Average Annual Day (AAD). However, because Alternative 3 and 4 operations over the Park would occur at low annual operational levels and would be highly seasonal in nature, the FAA based the noise analysis on the number of aircraft operations for each aircraft and route proposed under these alternatives. This approach provides a conservative evaluation of potential noise impacts to Park resources, as well as Section 4(f) resources, under Alternatives 3 and 4.

The noise was modeled for the acoustic indicators in the table and aircraft operations above using the FAA's Aviation Environmental Design Tool (AEDT) version 3e. Two types of analyses were performed using FAA's AEDT, Version 3e: 1) contour analysis and 2) representative location point analysis. A noise contour presents a graphical illustration or "footprint" of the area potentially affected by the noise. Location point results present the metric results at specific points of interest. The NPS provided a list of 38 location points, geographically located across the entire Park, where noise levels were to be evaluated. Contours were developed for the following metrics: 12-hour equivalent sound level, time audible for natural ambient, and time above 35 dBA. Location point analysis was conducted for the same set of metrics, as well as time above 52 dBA and the maximum sound level. See **Attachment C** for details of the location point analysis.

The noise analysis indicates that Alternatives 3 and 4 would not result in any noise impacts that would be reportable under FAA's policy for the NEPA. The resultant DNL due to Alternatives 3 and 4 is expected to be less than 60 dB and there would be a reduction in overall noise footprint under either of these alternatives.

Alternative 3

Under Alternative 3, 3,657 air tours, 93% of the existing number of flights based on the three-year average of reporting data from 2017-2019, would be authorized to fly within the ATMP planning area along routes consistent with those currently flown over the ATMP planning area. Because the number of authorized flights under Alternative 3 would be less than existing conditions and air tours would be limited to flying on designated routes within the ATMP planning area, evaluation of NPS supplemental metrics⁷ show that impacts to Section 4(f) resources would be less than impacts currently occurring within the ATMP planning area:

- On days when commercial air tours would occur, noise levels above 35 dBA (an indicator used by the NPS to assess the potential for degradation of the natural sound environment) would occur for at least 75 minutes in the ATMP planning area, including between 180 and 225

⁷ Noise contours were produced for the time above 35 dBA metric, but not the time above 52 dBA metric. For time above 52 dBA, location points across the Section 4(f) study area were used to assess impacts on Section 4(f) resources.

minutes in small areas (<9 %) below flight routes, up to 180 minutes in 19% of the ATMP planning area, and between 120 and 135 minutes in 55% of the ATMP planning area.

- On days when commercial air tours would occur, noise levels above 52 dBA (which is associated with speech interference) are not anticipated to exceed 68.1 minutes in the ATMP planning area. Location points (provided by the NPS) are specific points of interest geographically located across the entire ATMP planning area where noise levels were evaluated.

In addition, Alternative 3 would limit the operation of commercial air tours to one hour after sunrise until one hour before sunset or beginning at sunrise and ending at sunset for operators that have converted to quiet technology aircraft. These time restrictions provide times when visitors seeking solitude may experience the Section 4(f) resources without disruptions from commercial air tours. The altitudes required by Alternative 3, which would limit minimum altitudes to no lower than 900 ft. AGL for helicopters and no lower than 1,400 ft. AGL for fixed-wing aircraft, would reduce the maximum noise levels at sites directly below the air tour routes. In addition, Alternative 3 would limit the number of commercial air tours within the ATMP planning area to no more than 25 tours per day across all operators and limit the number of tours each operator could conduct on the days where air tours are permitted. Alternative 3 also prohibits hovering and circling by air tours.

Alternative 4

Under Alternative 4, 751 air tours, or 19% of the existing number of flights based on the three-year average of reporting data from 2017-2019, would be authorized to fly within the ATMP planning area along routes consistent with those currently flown over the ATMP planning area. Because the number of authorized flights under Alternative 4 would be substantially less than existing conditions, evaluation of NPS supplemental metrics⁸ show that impacts to Section 4(f) resources would be less than impacts currently occurring:

- On days when commercial air tours would occur, noise levels above 35 dBA (an indicator used by the NPS to assess the potential for degradation of the natural sound environment) would occur for at least 15 minutes in the ATMP planning area, including between 45 and 60 minutes in 42% of the ATMP planning area, up to 75 minutes in small regions (1%) below flight routes.
- On days when commercial air tours would occur, noise levels above 52 dBA (which is associated with speech interference) are not anticipated to exceed 21.1 minutes in the ATMP planning area. Location points (provided by the NPS) are specific points of interest geographically located across the ATMP planning area where noise levels were evaluated.

In addition, Alternative 4 would limit the operation of commercial air tours to between the hours of 9:00 AM and 5:00 PM, or beginning at sunrise and ending at sunset for operators that have converted to quiet technology aircraft. These time restrictions provide times when visitors seeking solitude may experience the Section 4(f) resources without disruptions from commercial air tours. Alternative 4 would limit minimum altitudes at least 900 ft. AGL for helicopters and at 1,400 ft. AGL for fixed-wing aircraft, and prohibit air tours below 5,000 ft. AGL within the ATMP planning area except those conducted on the authorized routes. These altitude restrictions would reduce the maximum noise levels at sites directly below the air tour routes. Alternative 4 would also limit the number of commercial air

⁸ Noise contours were produced for the time above 35 dBA metric, but not the time above 52 dBA metric. For time above 52 dBA, location points across the Section 4(f) study area were used to assess impacts on Section 4(f) resources.

tours within the ATMP planning area to no more than eight tours per day across all operators and limit the number of tours each operator could conduct on the days where air tours are permitted. In addition, Alternative 4 would prohibit hovering and circling by air tours.

As a result of the analysis presented above, FAA concludes there would be no substantial impairment to Section 4(f) resources in the Section 4(f) study area from noise-related effects under Alternatives 3 and 4. This conclusion supports the FAA's determination that Alternatives 3 and 4 would not constitute constructive use of Section 4(f) resources in the Section 4(f) study area.

The FAA also considered the potential for vibrational impacts on Section 4(f) resources under Alternatives 3 and 4. A review of vibrational impacts on sensitive structures such as geological resources, historic buildings, parklands, and forests suggests that the potential for damage resulting from helicopter overflights is minimal, if any, as the fundamental blade passage frequency is well above the natural frequency of these structures. Additionally, the vibration amplitude of these overflights at the altitudes prescribed in Alternatives 3 and 4 would be well below recommended limits.^{9, 10} Vibrational impacts are not anticipated to affect surrounding parkland and state forest areas given that aircraft overflights do not contain vibrational energy at levels which would affect outdoor areas or natural features and there is no substantial change from existing conditions.

Visual Impacts Analysis

Recognizing that some types of Section 4(f) resources may be affected by visual effects of commercial air tours, the FAA and the NPS considered the potential for the introduction of visual elements that could substantially diminish the significance or enjoyment of Section 4(f) resources in the Section 4(f) study area.

Alternatives 3 and 4 would limit the number of commercial air tours per year to 3,657 flights and 751 flights, respectively, and would limit those routes to five designated flight paths over the ATMP planning area. These restrictions would result in fewer areas of the ATMP planning area, and therefore, fewer Section 4(f) properties, from which a commercial air tour could be visible. Alternatives 3 and 4 would not introduce visual elements or result in visual impacts that would substantially diminish the activities, features or attributes of a Section 4(f) resource. Therefore, there would be no constructive use from visual impacts to Section 4(f) resources under Alternatives 3 and 4.

⁹ Hanson, C.E., King, K.W., et al. (1991). "Aircraft Noise Effects on Cultural Resources: Review of Technical Literature," NPOA Report No. 91-3 (HMMH Report No.290940.04-1), September 1991.

¹⁰ Volpe National Transportation Systems Center, Department of Transportation. (2014). Literature Review: Vibration of Natural Structures and Ancient/Historical Dwellings, Internal Report for National Park Service, Natural Sounds and Night Skies Division, August 21, 2014.

ATTACHMENT C

Section 4(f) Location Point Analysis

To assess time above 52 dBA at Section 4(f) resources under Alternatives 3 and 4, location points within 1.5 miles of each Section 4(f) resource were identified (Figure 1). The time above 52 dBA at location points and the range of time above 52 dBA at Section 4(f) resources based on nearby location points were then calculated and reported as high and low values. Table 1 shows the low and high modelled time above 52 dBA values under Alternative 3 and Alternative 4 at each Section 4(f) resource. Table 2 shows the distance between each Section 4(f) resource and nearby location point and the time above 52 dBA at the corresponding location point. A distance of 0.00 miles indicates that the location point falls within the Section 4(f) property. The longest time above 52 dBA in the Section 4(f) study area on days when air tours occur is 68.1 minutes under Alternative 3 and 21.1 minutes under Alternative 4.

Section 4(f) Study Area with Properties for ATMP at Mount Rushmore National Memorial

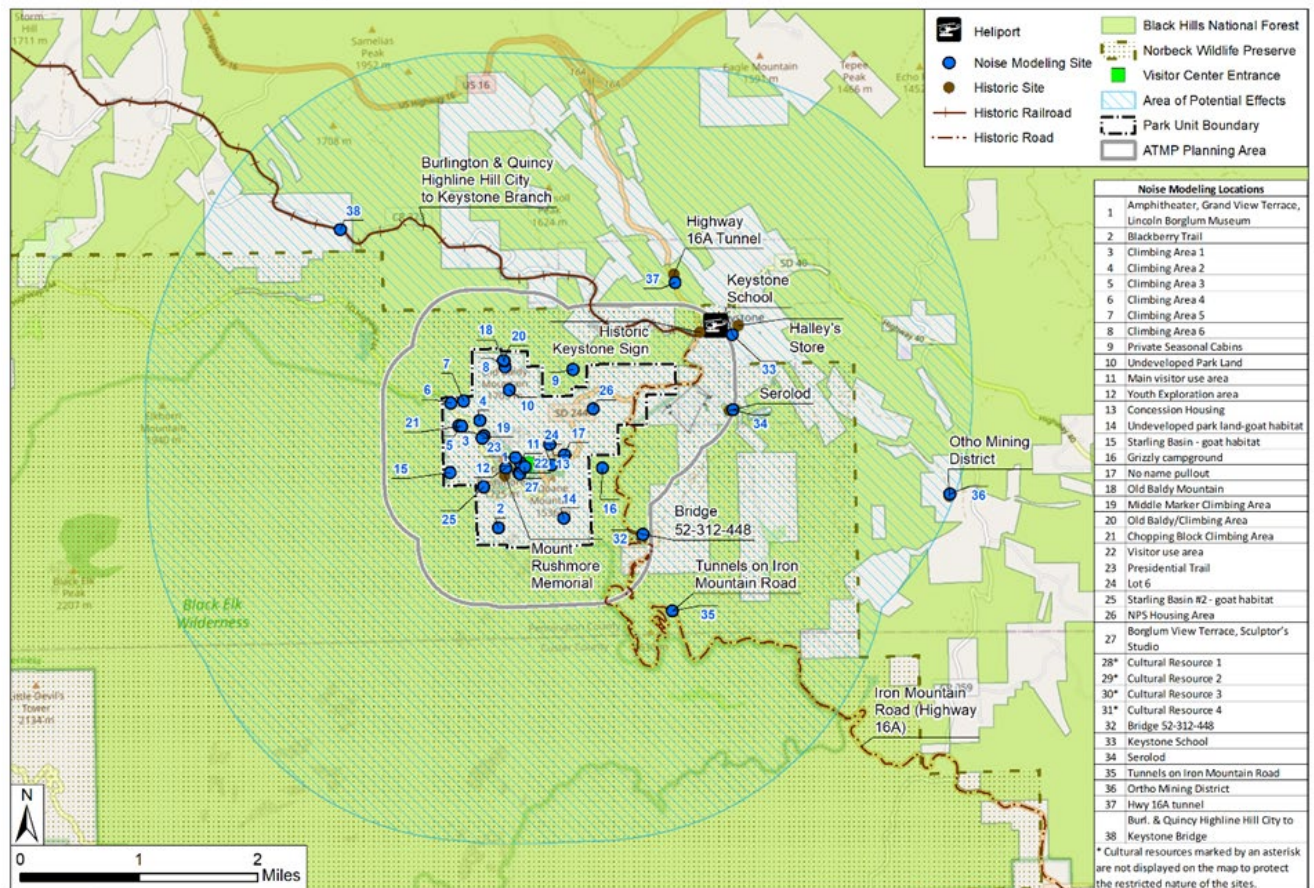


Figure 1. Section 4(f) resources and location points in the Section 4(f) study area.

Table 1. Low and high modelled values for Time above 52 dB under Alternatives 3 and 4 for Section 4(f) resources

Section 4(f) Resource	Time Above 52 dBA – Low (minutes) under Alternative 3	Time Above 52 dBA – High (minutes) under Alternative 3	Time Above 52 dBA – Low (minutes) under Alternative 4	Time Above 52 dBA – High (minutes) under Alternative 4
Black Hills National Forest	0	68.1	0	21.1
Bridge 52-312-448	5.9	68.1	2.3	21.1
Burlington & Quincy Highline Hill City to Keystone Branch	1.1	65.8	0.4	20.6
Halley's Store	8.6	41	3	13
Highway 16A Tunnel	8.6	41	3	13
Historic Keystone Sign	8.6	62.7	3	19.5
Iron Mountain Road (Highway 16A)	0.4	68.1	0.4	21.1
Keystone School	8.6	41	3	13
Mount Rushmore Memorial	3.9	68.1	1.3	21.1
Norbeck Wildlife Preserve National Game Refuge	0	68.1	0	21.1
Otho Mining District	0	0	0	0
Serolod	8.6	62.7	3	19.5
Tunnels on Iron Mountain Road	0.4	68.1	0.4	21.1

Table 2. Section 4(f) resources and corresponding location point data for air tours under Alternatives 3 and 4

Section 4(f) Resource	Location Point ID	Location Point Name	Distance to Location Point (Miles)	Time Above 52 dBA Under Alternative 3 (Minutes)	Time Above 52 dBA Under Alternative 4 (Minutes)
Black Hills National Forest	1	1. Amphitheater, Grand View Terrace, Lincoln Borglum Museum	0.39	32.1	10.3
Black Hills National Forest	2	2. Blackberry Trail	0.14	43.8	14
Black Hills National Forest	3	3. Climbing Area 1	0.33	3.9	1.3
Black Hills National Forest	4	4. Climbing Area 2	0.21	18	5.7
Black Hills National Forest	5	5. Climbing Area 3	0.12	20.1	6.6
Black Hills National Forest	6	6. Climbing Area 4	0.05	28.2	8.6
Black Hills National Forest	7	7. Climbing Area 5	0.03	27.8	8.9
Black Hills National Forest	8	8. Climbing Area 6	0.11	23.7	7.7
Black Hills National Forest	9	9. Private Seasonal Cabins	0.0	23.5	8.1
Black Hills National Forest	10	10. Undeveloped Park Land	0.25	22.3	7.6
Black Hills National Forest	11	11. Main Visitor Use Area	0.43	44	14
Black Hills National Forest	12	12. Youth Exploration Area	0.3	41.8	13.5
Black Hills National Forest	13	13. Concession Housing	0.35	48.7	15.3
Black Hills National Forest	14	14. Undeveloped Park Land-Goat Habitat	0.23	68.1	21.1
Black Hills National Forest	15	15. Starling Basin - Goat Habitat	0.04	23.1	7.9
Black Hills National Forest	16	16. Grizzly Campground	0.0	62.7	19.5
Black Hills National Forest	17	17. No name pullout	0.21	59.1	18.4
Black Hills National Forest	18	18. Old Baldy Mountain	0.06	17.8	6.3

Section 4(f) Resource	Location Point ID	Location Point Name	Distance to Location Point (Miles)	Time Above 52 dBA Under Alternative 3 (Minutes)	Time Above 52 dBA Under Alternative 4 (Minutes)
Black Hills National Forest	19	19. Middle Marker Climbing Area	0.31	14	4.5
Black Hills National Forest	20	20. Old Baldy/Climbing Area	0.06	38.1	12.6
Black Hills National Forest	21	21. Chopping Block Climbing Area	0.15	15.2	5.1
Black Hills National Forest	22	22. Visitor Use Area	0.4	49.1	15.5
Black Hills National Forest	23	23. Presidential Trail	0.41	46.7	15
Black Hills National Forest	24	24. Lot 6	0.33	65.8	20.6
Black Hills National Forest	25	25. Starling Basin #2 - Goat Habitat	0.07	30.5	10.2
Black Hills National Forest	26	26. NPS Housing Area	0.17	41	13
Black Hills National Forest	27	27. Borglum View Terrace, Sculptor's Studio	0.45	34.6	11.1
Black Hills National Forest	28	28. Cultural Resource 1**	<1.5 mi	0.7	0.7
Black Hills National Forest	29	29. Cultural Resource 2	<1.5 mi	32	10.3
Black Hills National Forest	30	30. Cultural Resource 3**	<1.5 mi	0.4	0.4
Black Hills National Forest	31	31. Cultural Resource 4	<1.5 mi	23.1	7.8
Black Hills National Forest	32	32. Bridge 52-312-448	0.0	48.5	15.7
Black Hills National Forest	33	33. Keystone School**	0.23	36.1	11.3
Black Hills National Forest	34	34. Serolod	0.0	8.6	3
Black Hills National Forest	35	35. Tunnels on Iron Mountain Road**	0.0	5.9	2.3
Black Hills National Forest	36	36. Ortho Mining District**	0.11	0	0
Black Hills National Forest	37	37. Highway 16A Tunnel**	0.0	29.6	9.1
Black Hills National Forest	38	38. Burlington & Quincy Highline Hill	0.1	1.1	0.4

Section 4(f) Resource	Location Point ID	Location Point Name	Distance to Location Point (Miles)	Time Above 52 dBA Under Alternative 3 (Minutes)	Time Above 52 dBA Under Alternative 4 (Minutes)
		City to Keystone Bridge**			
Bridge 52-312-448	1	1. Amphitheater, Grand View Terrace, Lincoln Borglum Museum	1.17	32.1	10.3
Bridge 52-312-448	2	2. Blackberry Trail	1.22	43.8	14
Bridge 52-312-448	11	11. Main Visitor Use Area	1.19	44	14
Bridge 52-312-448	12	12. Youth Exploration Area	1.28	41.8	13.5
Bridge 52-312-448	13	13. Concession Housing	1.09	48.7	15.3
Bridge 52-312-448	14	14. Undeveloped Park Land-Goat Habitat	0.68	68.1	21.1
Bridge 52-312-448	16	16. Grizzly Campground	0.65	62.7	19.5
Bridge 52-312-448	17	17. No name pullout	0.94	59.1	18.4
Bridge 52-312-448	22	22. Visitor Use Area	1.15	49.1	15.5
Bridge 52-312-448	23	23. Presidential Trail	1.25	46.7	15
Bridge 52-312-448	24	24. Lot 6	0.97	65.8	20.6
Bridge 52-312-448	25	25. Starling Basin #2 - Goat Habitat	1.4	30.5	10.2
Bridge 52-312-448	26	26. NPS Housing Area	1.14	41	13
Bridge 52-312-448	27	27. Borglum View Terrace, Sculptor's Studio	1.15	34.6	11.1
Bridge 52-312-448	29	29. Cultural Resource 2	<1.5 mi	32	10.3
Bridge 52-312-448	31	31. Cultural Resource 4	<1.5 mi	23.1	7.8
Bridge 52-312-448	32	32. Bridge 52-312-448	0.0	48.5	15.7
Bridge 52-312-448	34	34. Serolod	1.3	8.6	3
Bridge 52-312-448	35	35. Tunnels on Iron Mountain Road**	0.69	5.9	2.3
Burlington & Quincy Highline Hill City to Keystone Branch	1	1. Amphitheater, Grand View Terrace, Lincoln Borglum Museum	1.45	32.1	10.3

Section 4(f) Resource	Location Point ID	Location Point Name	Distance to Location Point (Miles)	Time Above 52 dBA Under Alternative 3 (Minutes)	Time Above 52 dBA Under Alternative 4 (Minutes)
Burlington & Quincy Highline Hill City to Keystone Branch	3	3. Climbing Area 1	1.34	3.9	1.3
Burlington & Quincy Highline Hill City to Keystone Branch	4	4. Climbing Area 2	1.23	18	5.7
Burlington & Quincy Highline Hill City to Keystone Branch	5	5. Climbing Area 3	1.31	20.1	6.6
Burlington & Quincy Highline Hill City to Keystone Branch	6	6. Climbing Area 4	1.15	28.2	8.6
Burlington & Quincy Highline Hill City to Keystone Branch	7	7. Climbing Area 5	1.1	27.8	8.9
Burlington & Quincy Highline Hill City to Keystone Branch	8	8. Climbing Area 6	0.74	23.7	7.7
Burlington & Quincy Highline Hill City to Keystone Branch	9	9. Private Seasonal Cabins	0.48	23.5	8.1
Burlington & Quincy Highline Hill City to Keystone Branch	10	10. Undeveloped Park Land	0.94	22.3	7.6
Burlington & Quincy Highline Hill City to Keystone Branch	11	11. Main Visitor Use Area	1.37	44	14
Burlington & Quincy Highline Hill City to Keystone Branch	12	12. Youth Exploration Area	1.48	41.8	13.5
Burlington & Quincy Highline	13	13. Concession Housing	1.12	48.7	15.3

Section 4(f) Resource	Location Point ID	Location Point Name	Distance to Location Point (Miles)	Time Above 52 dBA Under Alternative 3 (Minutes)	Time Above 52 dBA Under Alternative 4 (Minutes)
Hill City to Keystone Branch					
Burlington & Quincy Highline Hill City to Keystone Branch	16	16. Grizzly Campground	1.18	62.7	19.5
Burlington & Quincy Highline Hill City to Keystone Branch	17	17. No name pullout	1.15	59.1	18.4
Burlington & Quincy Highline Hill City to Keystone Branch	18	18. Old Baldy Mountain	0.7	17.8	6.3
Burlington & Quincy Highline Hill City to Keystone Branch	19	19. Middle Marker Climbing Area	1.37	14	4.5
Burlington & Quincy Highline Hill City to Keystone Branch	20	20. Old Baldy/Climbing Area	0.69	38.1	12.6
Burlington & Quincy Highline Hill City to Keystone Branch	21	21. Chopping Block Climbing Area	1.3	15.2	5.1
Burlington & Quincy Highline Hill City to Keystone Branch	22	22. Visitor Use Area	1.45	49.1	15.5
Burlington & Quincy Highline Hill City to Keystone Branch	23	23. Presidential Trail	1.36	46.7	15
Burlington & Quincy Highline Hill City to Keystone Branch	24	24. Lot 6	1.26	65.8	20.6
Burlington & Quincy Highline Hill City to Keystone Branch	26	26. NPS Housing Area	0.7	41	13

Section 4(f) Resource	Location Point ID	Location Point Name	Distance to Location Point (Miles)	Time Above 52 dBA Under Alternative 3 (Minutes)	Time Above 52 dBA Under Alternative 4 (Minutes)
Burlington & Quincy Highline Hill City to Keystone Branch	27	27. Borglum View Terrace, Sculptor's Studio	1.38	34.6	11.1
Burlington & Quincy Highline Hill City to Keystone Branch	31	31. Cultural Resource 4	<1.5 mi	23.1	7.8
Burlington & Quincy Highline Hill City to Keystone Branch	33	33. Keystone School**	0.3	36.1	11.3
Burlington & Quincy Highline Hill City to Keystone Branch	34	34. Serolod	0.69	8.6	3
Burlington & Quincy Highline Hill City to Keystone Branch	37	37. Highway 16A tunnel**	0.39	29.6	9.1
Burlington & Quincy Highline Hill City to Keystone Branch	38	38. Burlington & Quincy Highline Hill City to Keystone Bridge**	0.0	1.1	0.4
Halley's Store	9	9. Private Seasonal Cabins	1.44	23.5	8.1
Halley's Store	26	26. NPS Housing Area	1.41	41	13
Halley's Store	31	31. Cultural Resource 4	<1.5 mi	23.1	7.8
Halley's Store	33	33. Keystone School**	0.09	36.1	11.3
Halley's Store	34	34. Serolod	0.71	8.6	3
Halley's Store	37	37. Highway 16A tunnel**	0.65	29.6	9.1
Highway 16A Tunnel	9	9. Private Seasonal Cabins	1.17	23.5	8.1
Highway 16A Tunnel	26	26. NPS Housing Area	1.32	41	13
Highway 16A Tunnel	31	31. Cultural Resource 4	<1.5 mi	23.1	7.8
Highway 16A Tunnel	33	33. Keystone School**	0.71	36.1	11.3

Section 4(f) Resource	Location Point ID	Location Point Name	Distance to Location Point (Miles)	Time Above 52 dBA Under Alternative 3 (Minutes)	Time Above 52 dBA Under Alternative 4 (Minutes)
Highway 16A Tunnel	34	34. Serolod	1.25	8.6	3
Highway 16A Tunnel	37	37. Highway 16A tunnel**	0.07	29.6	9.1
Historic Keystone Sign	9	9. Private Seasonal Cabins	1.12	23.5	8.1
Historic Keystone Sign	16	16. Grizzly campground	1.41	62.7	19.5
Historic Keystone Sign	26	26. NPS Housing Area	1.11	41	13
Historic Keystone Sign	31	31. Cultural Resource 4	<1.5 mi	23.1	7.8
Historic Keystone Sign	33	33. Keystone School**	0.27	36.1	11.3
Historic Keystone Sign	34	34. Serolod	0.71	8.6	3
Historic Keystone Sign	37	37. Highway 16A tunnel**	0.47	29.6	9.1
Iron Mountain Road (Highway 16A)	1	1. Amphitheater, Grand View Terrace, Lincoln Borglum Museum	0.82	32.1	10.3
Iron Mountain Road (Highway 16A)	2	2. Blackberry Trail	1.04	43.8	14
Iron Mountain Road (Highway 16A)	3	3. Climbing Area 1	1.18	3.9	1.3
Iron Mountain Road (Highway 16A)	4	4. Climbing Area 2	1.23	18	5.7
Iron Mountain Road (Highway 16A)	5	5. Climbing Area 3	1.4	20.1	6.6
Iron Mountain Road (Highway 16A)	6	6. Climbing Area 4	1.49	28.2	8.6
Iron Mountain Road (Highway 16A)	7	7. Climbing Area 5	1.39	27.8	8.9

Section 4(f) Resource	Location Point ID	Location Point Name	Distance to Location Point (Miles)	Time Above 52 dBA Under Alternative 3 (Minutes)	Time Above 52 dBA Under Alternative 4 (Minutes)
Iron Mountain Road (Highway 16A)	8	8. Climbing Area 6	1.11	23.7	7.7
Iron Mountain Road (Highway 16A)	9	9. Private Seasonal Cabins	0.56	23.5	8.1
Iron Mountain Road (Highway 16A)	10	10. Undeveloped Park Land	1.02	22.3	7.6
Iron Mountain Road (Highway 16A)	11	11. Main Visitor Use Area	0.82	44	14
Iron Mountain Road (Highway 16A)	12	12. Youth Exploration Area	0.94	41.8	13.5
Iron Mountain Road (Highway 16A)	13	13. Concession Housing	0.63	48.7	15.3
Iron Mountain Road (Highway 16A)	14	14. Undeveloped Park Land-Goat Habitat	0.5	68.1	21.1
Iron Mountain Road (Highway 16A)	15	15. Starling Basin - Goat Habitat	1.4	23.1	7.9
Iron Mountain Road (Highway 16A)	16	16. Grizzly Campground	0.15	62.7	19.5
Iron Mountain Road (Highway 16A)	17	17. No name pullout	0.48	59.1	18.4
Iron Mountain Road (Highway 16A)	18	18. Old Baldy Mountain	1.13	17.8	6.3
Iron Mountain Road (Highway 16A)	19	19. Middle Marker Climbing Area	1.19	14	4.5
Iron Mountain Road (Highway 16A)	20	20. Old Baldy/Climbing Area	1.14	38.1	12.6
Iron Mountain Road (Highway 16A)	21	21. Chopping Block Climbing Area	1.38	15.2	5.1

Section 4(f) Resource	Location Point ID	Location Point Name	Distance to Location Point (Miles)	Time Above 52 dBA Under Alternative 3 (Minutes)	Time Above 52 dBA Under Alternative 4 (Minutes)
Iron Mountain Road (Highway 16A)	22	22. Visitor Use Area	0.81	49.1	15.5
Iron Mountain Road (Highway 16A)	23	23. Presidential Trail	0.87	46.7	15
Iron Mountain Road (Highway 16A)	24	24. Lot 6	0.57	65.8	20.6
Iron Mountain Road (Highway 16A)	25	25. Starling Basin #2 - Goat Habitat	1.12	30.5	10.2
Iron Mountain Road (Highway 16A)	26	26. NPS Housing Area	0.3	41	13
Iron Mountain Road (Highway 16A)	27	27. Borglum View Terrace, Sculptor's Studio	0.78	34.6	11.1
Iron Mountain Road (Highway 16A)	28	28. Cultural Resource 1**	<1.5 mi	0.7	0.7
Iron Mountain Road (Highway 16A)	29	29. Cultural Resource 2	<1.5 mi	32	10.3
Iron Mountain Road (Highway 16A)	30	30. Cultural Resource 3**	<1.5 mi	0.4	0.4
Iron Mountain Road (Highway 16A)	31	31. Cultural Resource 4	<1.5 mi	23.1	7.8
Iron Mountain Road (Highway 16A)	32	32. Bridge 52-312-448	0.0	48.5	15.7
Iron Mountain Road (Highway 16A)	33	33. Keystone School**	0.37	36.1	11.3
Iron Mountain Road (Highway 16A)	34	34. Serolod	0.39	8.6	3
Iron Mountain Road (Highway 16A)	35	35. Tunnels on Iron Mountain Road**	0.01	5.9	2.3

Section 4(f) Resource	Location Point ID	Location Point Name	Distance to Location Point (Miles)	Time Above 52 dBA Under Alternative 3 (Minutes)	Time Above 52 dBA Under Alternative 4 (Minutes)
Iron Mountain Road (Highway 16A)	37	37. Highway 16A tunnel**	0.58	29.6	9.1
Keystone School	9	9. Private Seasonal Cabins	1.37	23.5	8.1
Keystone School	26	26. NPS Housing Area	1.33	41	13
Keystone School	31	31. Cultural Resource 4	<1.5 mi	23.1	7.8
Keystone School	33	33. Keystone School**	0.0	36.1	11.3
Keystone School	34	34. Serolod	0.64	8.6	3
Keystone School	37	37. Highway 16A tunnel**	0.65	29.6	9.1
Mount Rushmore National Memorial	1	1. Amphitheater, Grand View Terrace, Lincoln Borglum Museum	0.12	32.1	10.3
Mount Rushmore National Memorial	2	2. Blackberry Trail	0.45	43.8	14
Mount Rushmore National Memorial	3	3. Climbing Area 1	0.38	3.9	1.3
Mount Rushmore National Memorial	4	4. Climbing Area 2	0.51	18	5.7
Mount Rushmore National Memorial	5	5. Climbing Area 3	0.57	20.1	6.6
Mount Rushmore National Memorial	6	6. Climbing Area 4	0.76	28.2	8.6
Mount Rushmore National Memorial	7	7. Climbing Area 5	0.72	27.8	8.9
Mount Rushmore National Memorial	8	8. Climbing Area 6	0.92	23.7	7.7
Mount Rushmore National Memorial	9	9. Private Seasonal Cabins	1.06	23.5	8.1

Section 4(f) Resource	Location Point ID	Location Point Name	Distance to Location Point (Miles)	Time Above 52 dBA Under Alternative 3 (Minutes)	Time Above 52 dBA Under Alternative 4 (Minutes)
Mount Rushmore National Memorial	10	10. Undeveloped Park Land	0.72	22.3	7.6
Mount Rushmore National Memorial	11	11. Main Visitor Use Area	0.17	44	14
Mount Rushmore National Memorial	12	12. Youth Exploration Area	0.06	41.8	13.5
Mount Rushmore National Memorial	13	13. Concession Housing	0.46	48.7	15.3
Mount Rushmore National Memorial	14	14. Undeveloped Park Land-Goat Habitat	0.62	68.1	21.1
Mount Rushmore National Memorial	15	15. Starling Basin - Goat Habitat	0.46	23.1	7.9
Mount Rushmore National Memorial	16	16. Grizzly Campground	0.82	62.7	19.5
Mount Rushmore National Memorial	17	17. No name pullout	0.53	59.1	18.4
Mount Rushmore National Memorial	18	18. Old Baldy Mountain	0.97	17.8	6.3
Mount Rushmore National Memorial	19	19. Middle Marker Climbing Area	0.37	14	4.5
Mount Rushmore National Memorial	20	20. Old Baldy/Climbing Area	0.97	38.1	12.6
Mount Rushmore National Memorial	21	21. Chopping Block Climbing Area	0.55	15.2	5.1
Mount Rushmore National Memorial	22	22. Visitor Use Area	0.13	49.1	15.5
Mount Rushmore National Memorial	23	23. Presidential Trail	0.17	46.7	15

Section 4(f) Resource	Location Point ID	Location Point Name	Distance to Location Point (Miles)	Time Above 52 dBA Under Alternative 3 (Minutes)	Time Above 52 dBA Under Alternative 4 (Minutes)
Mount Rushmore National Memorial	24	24. Lot 6	0.4	65.8	20.6
Mount Rushmore National Memorial	25	25. Starling Basin #2 - Goat Habitat	0.2	30.5	10.2
Mount Rushmore National Memorial	26	26. NPS Housing Area	0.93	41	13
Mount Rushmore National Memorial	27	27. Borglum View Terrace, Sculptor's Studio	0.18	34.6	11.1
Mount Rushmore National Memorial	29	29. Cultural Resource 2	<1.5 mi	32	10.3
Mount Rushmore National Memorial	31	31. Cultural Resource 4	<1.5 mi	23.1	7.8
Mount Rushmore National Memorial	32	32. Bridge 52-312-448	1.26	48.5	15.7
Norbeck Wildlife Preserve National Game Refuge	1	1. Amphitheater, Grand View Terrace, Lincoln Borglum Museum	0.0	32.1	10.3
Norbeck Wildlife Preserve National Game Refuge	2	2. Blackberry Trail	0.0	43.8	14
Norbeck Wildlife Preserve National Game Refuge	3	3. Climbing Area 1	0.0	3.9	1.3
Norbeck Wildlife Preserve National Game Refuge	4	4. Climbing Area 2	0.0	18	5.7
Norbeck Wildlife Preserve National Game Refuge	5	5. Climbing Area 3	0.0	20.1	6.6
Norbeck Wildlife Preserve National Game Refuge	6	6. Climbing Area 4	0.0	28.2	8.6

Section 4(f) Resource	Location Point ID	Location Point Name	Distance to Location Point (Miles)	Time Above 52 dBA Under Alternative 3 (Minutes)	Time Above 52 dBA Under Alternative 4 (Minutes)
Norbeck Wildlife Preserve National Game Refuge	7	7. Climbing Area 5	0.0	27.8	8.9
Norbeck Wildlife Preserve National Game Refuge	8	8. Climbing Area 6	0.0	23.7	7.7
Norbeck Wildlife Preserve National Game Refuge	9	9. Private Seasonal Cabins	0.0	23.5	8.1
Norbeck Wildlife Preserve National Game Refuge	10	10. Undeveloped Park Land	0.0	22.3	7.6
Norbeck Wildlife Preserve National Game Refuge	11	11. Main Visitor Use Area	0.0	44	14
Norbeck Wildlife Preserve National Game Refuge	12	12. Youth Exploration Area	0.0	41.8	13.5
Norbeck Wildlife Preserve National Game Refuge	13	13. Concession Housing	0.0	48.7	15.3
Norbeck Wildlife Preserve National Game Refuge	14	14. Undeveloped Park Land-Goat Habitat	0.0	68.1	21.1
Norbeck Wildlife Preserve National Game Refuge	15	15. Starling Basin - Goat Habitat	0.0	23.1	7.9
Norbeck Wildlife Preserve National Game Refuge	16	16. Grizzly Campground	0.0	62.7	19.5
Norbeck Wildlife Preserve National Game Refuge	17	17. No name pullout	0.0	59.1	18.4
Norbeck Wildlife Preserve National Game Refuge	18	18. Old Baldy Mountain	0.0	17.8	6.3
Norbeck Wildlife Preserve National Game Refuge	19	19. Middle Marker Climbing Area	0.0	14	4.5
Norbeck Wildlife Preserve National Game Refuge	20	20. Old Baldy/Climbing Area	0.0	38.1	12.6

Section 4(f) Resource	Location Point ID	Location Point Name	Distance to Location Point (Miles)	Time Above 52 dBA Under Alternative 3 (Minutes)	Time Above 52 dBA Under Alternative 4 (Minutes)
Norbeck Wildlife Preserve National Game Refuge	21	21. Chopping Block Climbing Area	0.0	15.2	5.1
Norbeck Wildlife Preserve National Game Refuge	22	22. Visitor Use Area	0.0	49.1	15.5
Norbeck Wildlife Preserve National Game Refuge	23	23. Presidential Trail	0.0	46.7	15
Norbeck Wildlife Preserve National Game Refuge	24	24. Lot 6	0.0	65.8	20.6
Norbeck Wildlife Preserve National Game Refuge	25	25. Starling Basin #2 - Goat Habitat	0.0	30.5	10.2
Norbeck Wildlife Preserve National Game Refuge	26	26. NPS Housing Area	0.0	41	13
Norbeck Wildlife Preserve National Game Refuge	27	27. Borglum View Terrace, Sculptor's Studio	0.0	34.6	11.1
Norbeck Wildlife Preserve National Game Refuge	28	28. Cultural Resource 1**	<1.5 mi	0.7	0.7
Norbeck Wildlife Preserve National Game Refuge	29	29. Cultural Resource 2	<1.5 mi	32	10.3
Norbeck Wildlife Preserve National Game Refuge	30	30. Cultural Resource 3**	<1.5 mi	0.4	0.4
Norbeck Wildlife Preserve National Game Refuge	31	31. Cultural Resource 4	<1.5 mi	23.1	7.8
Norbeck Wildlife Preserve National Game Refuge	32	32. Bridge 52-312-448	0.0	48.5	15.7
Norbeck Wildlife Preserve National Game Refuge	33	33. Keystone School**	0.0	36.1	11.3
Norbeck Wildlife Preserve National Game Refuge	34	34. Serolod	0.0	8.6	3

Section 4(f) Resource	Location Point ID	Location Point Name	Distance to Location Point (Miles)	Time Above 52 dBA Under Alternative 3 (Minutes)	Time Above 52 dBA Under Alternative 4 (Minutes)
Norbeck Wildlife Preserve National Game Refuge	35	35. Tunnels on Iron Mountain Road**	0.0	5.9	2.3
Norbeck Wildlife Preserve National Game Refuge	36	36. Ortho Mining District**	0.79	0	0
Norbeck Wildlife Preserve National Game Refuge	37	37. Highway 16A tunnel**	0.2	29.6	9.1
Norbeck Wildlife Preserve National Game Refuge	38	38. Burlington & Quincy Highline Hill City to Keystone Bridge**	0.18	1.1	0.4
Otho Mining District	36	36. Ortho Mining District**	0.02	0	0
Serolod	9	9. Private Seasonal Cabins	1.37	23.5	8.1
Serolod	16	16. Grizzly Campground	1.18	62.7	19.5
Serolod	17	17. No name pullout	1.44	59.1	18.4
Serolod	26	26. NPS Housing Area	1.15	41	13
Serolod	31	31. Cultural Resource 4	<1.5 mi	23.1	7.8
Serolod	32	32. Bridge 52-312-448	1.28	48.5	15.7
Serolod	33	33. Keystone School**	0.64	36.1	11.3
Serolod	34	34. Serolod	0.03	8.6	3
Serolod	37	37. Highway 16A tunnel**	1.18	29.6	9.1
Tunnels on Iron Mountain Road	14	14. Undeveloped Park Land-Goat Habitat	1.2	68.1	21.1
Tunnels on Iron Mountain Road	16	16. Grizzly Campground	1.34	62.7	19.5
Tunnels on Iron Mountain Road	29	29. Cultural Resource 2	<1.5 mi	32	10.3
Tunnels on Iron Mountain Road	30	30. Cultural Resource 3**	<1.5 mi	0.4	0.4
Tunnels on Iron Mountain Road	32	32. Bridge 52-312-448	0.69	48.5	15.7

**Location point is outside the ATMP planning area.

Final EA – Additional Appendix Materials

Appendix J – Public Scoping Materials

Copies of all public comments received during public scoping

Copies of All Public Comments Received during Public Scoping

Correspondence ID: 1 Project: 97377 Document: 123303
Name: Pattee, Nathan
Received: Sep,06 2022 11:04:47
Correspondence Type: Web Form

Correspondence: As a visitor to Mount Rushmore many times throughout my life, I strongly oppose air tours of all kinds. The noise, distraction, and threat to somber, meaningful experience to the vast majority of visitors betrays the integrity and missions of the NPS. Mount Rushmore has many different ways to appreciate and learn from the site in a respectful, accessible way. Of all the options being considered, I firmly believe that prohibiting air tours over or within a half-mile of the park is the clear, best option for the site, the black hills environment, its associated tribes, and many visitors. Thank you for your consideration!

Correspondence ID: 2 Project: 97377 Document: 123303
Name: ,
Received: Sep,06 2022 13:19:26
Correspondence Type: Web Form

Correspondence: Having been a seasonal ranger back in 1972 and 1973 one of the biggest complaints I received from visitors was why are aircraft allowed to fly in the area of the monument. When informed they had to fly at a specified distance they said that's not right. There should not be aircraft making noise interfering with my visit.

I agree with that comment. I vote for no aircraft within 1 mile of the park boundary.

Correspondence ID: 3 Project: 97377 Document: 123303
Name: Wolfe, Paul P
Received: Sep,06 2022 13:30:20
Correspondence Type: Web Form

Correspondence: Please limit tourism flights to no more than one an hour. I've camped at one of the Park Service campgrounds near Mt Rushmore and helicopter flights almost directly overhead, nearly every ½ hour all day, everyday. Made for a less than enjoyable vacation.

Correspondence ID: 4 Project: 97377 Document: 123303
Name: Pattee, Evan
Received: Sep,06 2022 13:33:02
Correspondence Type: Web Form

Correspondence: Alternative 2 - "No Air Tours in the Planning Area" is the best and ONLY option to the greatest protection of

the Park's natural and cultural resources and visitor experience management objectives. I have visited Mount Rushmore many times and my favorite moments have been the quiet and serene moments on a lookout where I can enjoy the sounds of nature and feel the impact of the park. Please do not ruin this. Alternative 2 is the only way to go.

Correspondence ID: 5 Project: 97377 Document: 123303

Name: ,
Received: Sep,06 2022 14:48:50
Correspondence Type: Web Form

Correspondence: Commercial air tours over Mount Rushmore National Memorial should be prohibited over or within a half-mile of the park.

Correspondence ID: 6 Project: 97377 Document: 123303
Name: ,
Received: Sep,06 2022 21:38:29
Correspondence Type: Web Form

Correspondence: Please please please eliminate totally the constant barrage of helicopter flights over the campgrounds and black elk wilderness and Custer state park! This has gotten to a horrific level of noise in an area that people are trying to utilize to escape from noise! We hike in the wilderness and camp at places throughout the Hills and have coptors constantly flying over us low enough to not even be able to hear another person talk!

What a beautiful area we have to have it totally destroyed by these flights!

Correspondence ID: 7 Project: 97377 Document: 123303
Name: Swenson, Greg
Received: Sep,06 2022 21:57:47
Correspondence Type: Web Form

Correspondence: I find helicopter flights near Mt. Rushmore, or in any national park, to be a significant distraction. They produce visual, noise, and air pollution. They detract from the experience of visiting places that are notable for their natural beauty. I would prefer that such flights not be allowed at low altitudes, or at distances where the aircraft can be heard.

Correspondence ID: 8 Project: 97377 Document: 123303
Name: ,
Received: Sep,07 2022 05:18:21
Correspondence Type: Web Form

Correspondence: I am opposed to helicopter touring around Mt Rushmore The high noise levels are disruptive to the visitor experience People come to the Black Hills to enjoy nature and the frequency and intensity of noise ruins the experience. Those who come to the monument should not have their visit diminished by Loyd helicopters overhead

Correspondence ID: 9 Project: 97377 Document: 123303
Name: ,
Received: Sep,07 2022 05:18:23
Correspondence Type: Web Form

Correspondence: I am opposed to helicopter touring around Mt Rushmore The high noise levels are disruptive to the visitor experience People come to the Black Hills to enjoy nature and the frequency and intensity of noise ruins the experience. Those who come to the monument should not have their visit diminished by Loyd helicopters overhead

Correspondence ID:	10	Project: 97377	Document:	123303
Name:	,			
Received:	Sep,07 2022 05:41:00			
Correspondence Type:	Web Form			

Correspondence: We have a home near Keystone,SD and feel there are already too many flights around Mt. Rushmore and the surrounding area.

This causes disruption of the serenity of the Hills, changes in animal behavior, wild and domestic, difficulty holding conversation,

disruption in learning opportunities from park ranger talks and other educational endeavors. Camping is not the "back to nature" experience that it should be for families with so much noise from flights overhead. I believe flight numbers should NOT

be increased and should be decreased over Rushmore, the Black Elk Wilderness, and surrounding areas due to noise pollution in such a pristine wilderness setting.

Correspondence ID:	11	Project: 97377	Document:	123303
Name:	,			
Received:	Sep,07 2022 05:41:01			
Correspondence Type:	Web Form			

Correspondence: We have a home near Keystone,SD and feel there are already too many flights around Mt. Rushmore and the surrounding area.

This causes disruption of the serenity of the Hills, changes in animal behavior, wild and domestic, difficulty holding conversation,

disruption in learning opportunities from park ranger talks and other educational endeavors. Camping is not the "back to nature" experience that it should be for families with so much noise from flights overhead. I believe flight numbers should NOT

be increased and should be decreased over Rushmore, the Black Elk Wilderness, and surrounding areas due to noise pollution in such a pristine wilderness setting.

Correspondence ID:	12	Project: 97377	Document:	123303
Name:	Puffer, Matthew J			
Received:	Sep,07 2022 06:15:41			
Correspondence Type:	Web Form			

Correspondence: I live very near Mt Rushmore and have enjoyed visiting many many times including the visitor center, amphitheater and surrounding walking and hiking areas. I have also made use of the Black Elk Wilderness hiking trails, picnic areas, climbing sites and viewpoints. Also, I am a frequent visitor to Custer State Park including Sylvan Lake which is relatively close to Mt Rushmore. Helicopters are LOUD! They are just the opposite of the greatest attributes of Mt Rushmore and surrounding areas: peace, serenity and natural beauty. They are made use of by very few people but negatively affect many many more who are actually making use of the wonderful natural outdoors! These helicopter tours are a for profit business and do not enhance the overall visitor or resident experience! Also, realize they are not based at Mt Rushmore so must travel over these other areas and private lands to get to and from Mt Rushmore. So why make things way worse for most people to benefit just a few? I VOTE FOR DECREASING THE ALLOWED NUMBER OF HELICOPTER FLIGHTS! Thank you.

Correspondence ID:	13	Project: 97377	Document:	123303
Name:	,			
Received:	Sep,07 2022 08:25:59			
Correspondence Type:	Web Form			

Correspondence: Please stop all air tour flights over National Parks, including Mount Rushmore. These flights seriously distract from the reverence and awe of our national and protected areas. The parks are reminders of all the great things about our country that we hold dear - whether that is beauty, nature, or heroic figures. These places are special and should be treated with special care. Even limited flights for a few distract a lot from the many. Allowing a few flights is a reminder that not all are equal in opportunities while disturbing the experience of most people. Traveling to the parks is often a once-in-a-lifetime trip. Let's see if we can keep America the home of opportunities for all, and where democracy and greatness is revered.

Correspondence ID:	14	Project: 97377	Document:	123303
Name:	Christensen, Chris			
Received:	Sep,07 2022 09:39:39			
Correspondence Type:	Web Form			

Correspondence: Let them fly as much as they want just don't let them fly directly over keep them back 1/2 mile.

Correspondence ID:	15	Project: 97377	Document:	123303
Name:	,			
Received:	Sep,07 2022 17:14:47			
Correspondence Type:	Web Form			

Correspondence: Alternative 2 seems overly restrictive, and just pushes the same number of flights further out from the sculpture. Alternative 4, limiting seasons, hours, and routes, along with the number of flights per day, is the best option.

Correspondence ID:	16	Project: 97377	Document:	123303
Name:	,			
Received:	Sep,08 2022 19:36:59			
Correspondence Type:	Web Form			

Correspondence: Alternative 4 would allow these tour operators to continue, with limits. The past few years they have deviated from previous tour routes, fly directly over inhabited residences. They need to be governed a bit tighter and locked into the published routes in Alternative 4, with limits on flights and times and dates.

Correspondence ID:	17	Project: 97377	Document:	123303
Name:	Cahoon, Brandy			
Received:	Sep,11 2022 10:46:31			
Correspondence Type:	Web Form			

Correspondence: Good morning,

I am writing in response to the helicopter tours around Mount Rushmore. My husband and I have traveled to South Dakota to have an experience of learning more about our wonderful country we live in.

After visiting the site and realizing I would not be able to walk up the trail due to health issues. We decided to do a flight tour with Black Hills Aerial Adventure. I can not express what that meant to me! The pilot was knowledgeable and shared facts and information. Being able to see the monument up close was just inspiring and the feeling of patriotism was more than I could express. It would be heart breaking if others - especially those who have health issues that can not make that walk - had the opportunity to see this amazing site taken away from them. Please do not take this away from many people like me who want this memorable experience.

Brandy Cahoon

Correspondence ID:	18	Project: 97377	Document:	123303
Name:	,			
Received:	Sep,11 2022 13:48:09			
Correspondence Type:	Web Form			

Correspondence: I think that there should be no change at all. The tours currently provided in my opinion have the lowest impact of all visitation types leaving behind no trace, produce the least amount of noise and emissions compared to other means of transportation (especially the motorcycles), the air tours provide a relief to the park during peak times of the season and also provides a vital economic benefit to the surrounding communities. To add to these points, the air tours also provide a unique and memorable service to those with disabilities who would normally not be able to experience the park as a whole.

Limiting these air tours would not benefit anyone, in fact I personally believe it would harm the community of the black hills by decreasing the amount of available activities for visitors, and cause more harm in the park on the ground.

Correspondence ID:	19	Project: 97377	Document:	123303
Name:	Schlueter, Austyn M			
Received:	Sep,12 2022 12:35:46			
Correspondence Type:	Web Form			

Correspondence: Air tourism provides a fun and safe way for people to view and enjoy the black hills and Mount Rushmore. Some people are handicap and unable to see certain areas and helicopter tours allow them that great experience. It also brings more tourism and visitors to the area which helps all local businesses thrive. Also air tours are much quieter than the loud motorcycles that rev thru the parks. Air tours should not be limited in any way. Especially since they are in the air hundreds of feet above ground not on the ground making noise like motorcycles.

Correspondence ID:	20	Project: 97377	Document:	123303
Name:	McKenzie, Jesse J			
Received:	Sep,14 2022 10:14:52			
Correspondence Type:	Web Form			

Correspondence: Hello, I recently had the amazing opportunity to take a helicopter tour by Mt Rushmore with my brother. My brother is disabled and has a very hard time walking so going to see the park and it's surrounding areas would be next to impossible without the help of Rushmore Helicopters. I was deeply saddened when I learned that they may soon not be able to continue flying near the monument because for families like mine this is the most effective way to see many of the landmarks in the area. I think that helicopter tours are a valuable asset to many people with disabilities or mobility

issues because I believe that all people should have the opportunity to enjoy the parks in a safe non invasive way.

Correspondence ID:	21	Project: 97377	Document:	123303
Name:	,			
Received:	Sep,14 2022 10:19:45			
Correspondence Type:	Web Form			

Correspondence: Hello,

I was able take a tour by helicopter around Mt. Rushmore and it was absolutely incredible. Being able to see the land from above was something I will never forget. While I was taking a flight, I saw the employees assist one with disabilities into a helicopter. This made me think of what an incredible opportunity it was for this person. He was in no shape to walk the trails around Mt. Rushmore so this was another way for him to experience the history of the area. This is just one person out of the many who are disabled where walking is difficult for them. It is sad to think that if there is no helicopters tours, there is no way for these people to be able to see history. Also if these tours were stopped there would be a major increase in the parks which would lead to the experience being much less enjoyable. I think the helicopter tours should continue to happen to help those who wouldn't be able to experience the park from the ground and lessen the foot traffic at the park itself.

Correspondence ID:	22	Project: 97377	Document:	123303
Name:	Tester, John			
Received:	Sep,15 2022 03:36:07			
Correspondence Type:	Web Form			

Correspondence: Test message body

Correspondence ID:	23	Project: 97377	Document:	123303
Name:	Tester, John			
Received:	Sep,15 2022 03:40:40			
Correspondence Type:	Web Form			

Correspondence: Test message body

Correspondence ID:	24	Project: 97377	Document:	123303
Name:	Mathiowetz, Adam W			
Received:	Sep,16 2022 06:49:12			
Correspondence Type:	Web Form			

Correspondence: I have visited Mount Rushmore National Memorial 5 times in the last 10 years and every time, a personal conversation or information from park staff has been missed or interrupted due to the noise of the air traffic.

I support Alternatives 2 and 4. My first choice would be Alternative 2, but I recognize the economic benefits of at least allowing some aerial tourism and begrudgingly think Alternative 4 is probably the best overall option. Either a significant reduction in air traffic or no close air traffic at all would greatly enhance the enjoyment of most people that visit the memorial.

I also offer another alternative or possible addition to the various ATMP's. Instead of a 1/2 mile lateral buffer, which I call an exclusion zone, directly around the memorial sculpture, increase that distance to

3/4 of a mile. Based on the flight path routes shown on the map in the Alternative 1 section on page 10 of the document there is a convergence point for the best view and it is right on the edge of the 1/2 later buffer. Increasing that buffer distance would not only help with the noise, but it may also allow for a similar number of flights as the average that is shown in the ATMP document and thus Alternative 3 becomes far more reasonable in my mind.

Thank you for your consideration.

Correspondence ID:	25	Project: 97377	Document:	123303
Name:	O'Gara, Hugh			
Received:	Sep,16 2022 13:21:17			
Correspondence Type:	Web Form			

Correspondence: If not outright banned, the helicopter tours around Mt. Rushmore should be severely limited. In the more than four decades I have lived near the Faces, I have found them to be disruptive to the monument's intent of reflecting on the nation's history...what were their intentions and what did they accomplish. Any sort of introspection is difficult if not impossible with copters swooping around the edges. One of the local copter tour owners - Mike Jacobs - stated in the local weekly paper that (and I'm paraphrasing) people with the money should be able to enjoy Mt. Rushmore from the air. Well, I'm not sure us earth-bound serfs agree.

Your ATMP should restore the reflective quiet around the memorial.

Thanks

Hugh O'Gara

Correspondence ID:	26	Project: 97377	Document:	123303
Name:	Schlaefli, Mark			
Received:	Sep,16 2022 18:54:58			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to provide comment on the proposed Air Tour Management Plan (ATMP) for Mount Rushmore National Memorial (MORU)

I support the concept of Air Tour Management Plans (ATMP) and Voluntary Agreements (VA). Responsible operators should work hand in hand with stakeholders, communities, and park units to create structures that protect resources, provide opportunities, and encourage economic benefit for the public.

However, the process that is now underway for the development of the ATMP at MORU gives cause for serious concern. The development of the ATMP for MORU by the National Park Service (NPS) and the Federal Aviation Administration (FAA) is taking a path that all stakeholders including the park units - should be concerned about.

Both NPS and the FAA are engaging in significant government overreach behind closed doors. The NPS is taking the opportunity to forward an agenda through actions that are not required or mandated by the Air Tour Management Act of 2000 (NPATMA) or the court order that has compressed the timeline for plan development. The Voluntary Agreement option that is an approved process by NPATMA and the courts is being wholeheartedly ignored in an effort to shut out interested parties.

A Voluntary Agreement for MORU was completed but never fully executed as the NPS pulled out of it prior to its execution. The Voluntary Agreement process represents the fastest possible implementation of the plan required by NPATMA, while satisfying the requirements of the court order. Current delays in

the implementation process can be directly attributed to action by the NPS to further their internal agenda to eliminate Air Tours. A Voluntary Agreement could be completed immediately.

The NPS and the FAA have shut out stakeholders, operators, and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of NPATMA.

NPOAG guidance is critical to safety and the economic stability of the air tour industry while balancing the needs of the environment, tribal interests, the NPS, and the FAA. Representatives from all the above factions have a seat on NPOAG and provide valuable expertise. Excluding NPOAG in the ATMP process is negligent and violates congressional intent.

This unilateral action by the NPS under the guise of regulatory lite designed to avoid the inclusion of stakeholders represents several potential violations of NPATMA. Additionally, the FAA has taken a backseat to the NPS and has failed to provide input that maintains safety or satisfies the needs of aviation interests - key components of the FAA mission.

The Proposed Options in the September Newsletter produced by the NPS is largely boilerplate and was designed to pre-shape public comment by offering options with no justification or data to support the offerings as required by NPATMA. This is a terribly flawed process, designed to produce an NPS desired outcome over what is best for aviation safety, public interest, and local economic stability.

In the absence of input from stakeholders, operators, and the NPOAG, serious safety concerns from elevated risks will result from the implementation of any of the proposed options. The NPS does not have the expertise to make these adjustments. The FAA, who is tasked as the lead agency, has failed to provide adequate risk assessment and safety input in the decision-making process. Current operations inside MORU are the direct result of cooperation and collaboration between operators and the local MORU stakeholders. The operators meet yearly with NPS staff for orientation and discussion, facts that are conveniently left out of the September Newsletter.

Aerial tourism at Mt. Rushmore has origins all the way back to the 1960s. The experience of viewing this man-made wonder from the air should remain available to all. Air tour companies are dedicated to community compatible operation and should be at the table as a key element of plan development. The operators, not the agencies, possess the expertise necessary to design and implement an approach that satisfies all stake holders.

The economic impact these plans will have on air tour companies is significant. Air tour operators play a key role in workforce development for the vertical lift industry. Air Ambulance, Firefighting and Utility operations depend on the Air Tour sector as a source of qualified and experienced pilots and mechanics. The reduction or in some cases outright elimination of this workforce pool would exacerbate current pilot shortages and have impacts well beyond the limited footprint of MORU.

These impacts have reverberating consequences for the local and state economy, both of which are required elements of consideration under NPATMA and have so far been ignored. The economic value of Air Tours to the local and state economy is significant and must be considered in the Implementation of any plan as required by NPATMA.

While the proposed options offer only small adjustments to flight routes, the flight allocation reductions and restrictions present a significant increase in risk, as those flights would then simply move outside of the memorial boundary and compress air traffic into a smaller area. Given the small size of the memorial at 1272 acres, and the fact that Air Tours only fly through less than a third of that area, the theoretical impacts would not at all be reduced. In fact, the result will be significantly increased risk and greater community impact, both elements that the operators are continuously striving to minimize.

The proposed reductions and restrictions do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends

change, and NPS should in good faith respect that dynamic, as visitors alter their destinations and activities according to those trends.

Air Tours are a vital option for many visitors. The experience provides a once-in-a-lifetime opportunity to experience natural and man-made landmarks. Air Tours also provide opportunities to persons with disabilities, the very young and the elderly to experience our public lands in a way that creates equal opportunity for enjoyment.

Visitors choosing aerial tourism represent the lowest impact form of visitation to any park, recreation area, or memorial. To date, the agencies have failed to conduct any studies that indicate otherwise. The Town of Keystone, immediately adjacent to Mt. Rushmore conducted a noise study through a third party, and it found the number one contributor to noise came from motorcycles and other vehicles, not helicopter traffic. As the parking garage is immediately adjacent to the memorial, more vehicles enter MORU in a few hours over the course of any day during the busy season than Air Tours over the course of an entire year.

Aerial tourism reduces impacts to parks, recreation areas and memorials by offering an alternative method of visitation. Air Tours represents the lowest form of impact in the park, leaving absolutely no trace, while reducing congestion and demand on park infrastructure in a significant way. For the NPS to ignore this fact is disingenuous at best. Independent studies should be conducted to establish data that should guide the process, not internal politics within an agency of government.

By further restricting an already very limited number of allowable air tours, we are reducing the most environmentally responsible access to Mt. Rushmore, which is in opposition to the very goals stated by the NPS in the September Newsletter. Through strict altitude and route requirements to mitigate noise just to name a few efforts air-tour operators are continually working to ensure they are responsible stewards of the environment.

Currently, there are no restrictions or mitigation efforts proposed for other vehicles operating inside the boundaries of Mt. Rushmore. For example, throughout the summer months, heavy motorcycle traffic at the memorial produces far more noise impact than aerial tourism. A study was completed by the Town of Keystone, adjacent to the memorial that clearly shows this to be the case.

For individuals and groups with disabilities, aerial tourism provides the access promised in the mission of the NPS. The Memorial should be available for all visitors to enjoy. Oppressive limitations within the memorial boundary unfairly limits the elderly, very young, handicapped, and others who wish to experience the memorial. Limiting flights over the memorial restricts access for those who might not have the time, resources, or physical ability to see the memorial any other way.

The NPS cannot and should not be permitted to independently drive the ATMP process behind closed doors. I strongly urge you to consult with the stakeholders, operators and NPOAG on the further development of the ATMP for MORU to collaboratively address the concerns as an alternative to the current flawed approach.

Correspondence ID:	27	Project: 97377	Document:	123303
Name:	Bolek, Temple			
Received:	Sep,18 2022 17:24:36			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory

Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

NPOAG guidance is critical to the safety and economic stability of the air tour industry while balancing the needs of the environment, tribal interests, the NPS, and the FAA. Excluding NPOAG in the ATMP process is negligent and violates congressional intent.

The Public Scoping Documents serve to pre-shape public comment by offering options with no justification or data to support the offerings. This is a terribly flawed process, moving forward without critical NPOAG input, to produce an agency desired outcome.

Without the expertise and safety input from stakeholders, operators, and the NPOAG, serious safety concerns will arise as the NPS, with no expertise, moves, compresses, combines and shifts flight routes and altitudes that have been in place for years. The very routes in question were designed jointly between operators and the local Park Unit stakeholders.

Aerial tourism at Mt. Rushmore dates back to the 1960s. The economic impact these plans will have on the existing air tour companies threatens to shut down businesses that have been operating safely and responsibly for the past 30 years. This impact has reverberating consequences for the local and state economy, both of which are required elements of consideration and have been ignored.

Aerial tourism provides significant workforce development opportunities that support other sectors of the vertical lift industry to include firefighting and emergency medical services. The elimination of this workforce pool would exacerbate current pilot shortages and have impacts well beyond the limited footprint of the Mt Rushmore National Memorial.

The proposed options suggest flight allocation numbers that do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change, and NPS should in good faith respect that dynamic, as visitors alter their destinations and activities according to those trends.

Air tours are a vital option for many visitors providing a once-in-a-lifetime opportunity to experience natural and man-made landmarks. Visitors choosing aerial tourism represent the lowest impact to any park, recreation area, or memorial. Aerial tourism reduces impacts to parks, recreation areas and memorials. Aerial tourism provides the lowest form of impact in the park, leaving absolutely no trace, while reducing congestion and demand on park infrastructure in a significant way. For the NPS to ignore this fact is disingenuous at best.

By further restricting an already very limited number of allowable air tours, we are reducing the most environmentally responsible access to Mt. Rushmore, which is in opposition to the very goals stated by the NPS in the Public Scoping Documents. Through strict altitude and route requirements to mitigate noise just to name a few efforts air-tour operators are continually working to ensure they are responsible stewards of the environment.

Currently, there are no restrictions or mitigation efforts for other vehicles operating inside the boundaries of Mt. Rushmore. For example, throughout the summer months, heavy motorcycle traffic at the memorial produces far more impact than aerial tourism. A study was completed by the Town of Keystone, adjacent to the memorial that clearly shows this to be the case.

For individuals and groups with disabilities, aerial tourism provides the access promised in the mission of the NPS. The Memorial should be available for all visitors to enjoy. Limiting flights within the memorial boundary unfairly limits the elderly, very young, handicapped, and others who wish to experience the memorial. Limiting flights over the Memorial restricts access for those who might not have the time, resources, or physical ability to see the memorial any other way.

The NPS cannot independently drive the ATMP process behind closed doors. I strongly urge you to consult with the stakeholders, operators and NPOAG on the further development of the ATMPs to collaboratively address the concerns as an alternative to the current flawed approach.

Correspondence ID:	28	Project: 97377	Document:	123303
Name:	Stephens, Ashley			
Received:	Sep,18 2022 20:14:57			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

NPOAG guidance is critical to the safety and economic stability of the air tour industry while balancing the needs of the environment, tribal interests, the NPS, and the FAA. Excluding NPOAG in the ATMP process is negligent and violates congressional intent.

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Aerial tourism at Mt. Rushmore dates back to the 1960s. The economic impact these plans will have on the existing air tour companies threatens to shut down businesses that have been operating safely and responsibly for the past 30 years. This impact has reverberating consequences for the local and state economy, both of which are required elements of consideration and have been ignored.

Aerial tourism provides significant workforce development opportunities that support other sectors of the vertical lift industry to include firefighting and emergency medical services. The elimination of this workforce pool would exacerbate current pilot shortages and have impacts well beyond the limited footprint of the Mt Rushmore National Memorial.

The proposed options suggest flight allocation numbers that do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change, and NPS should in good faith respect that dynamic, as visitors alter their destinations and activities according to those trends.

Air tours are a vital option for many visitors providing a once-in-a-lifetime opportunity to experience natural and man-made landmarks. Visitors choosing aerial tourism represent the lowest impact to any park, recreation area, or memorial. Aerial tourism reduces impacts to parks, recreation areas and memorials. Aerial tourism provides the lowest form of impact in the park, leaving absolutely no trace, while reducing congestion and demand on park infrastructure in a significant way. For the NPS to ignore this fact is disingenuous at best.

By further restricting an already very limited number of allowable air tours, we are reducing the most environmentally responsible access to Mt. Rushmore, which is in opposition to the very goals stated by the NPS in the Public Scoping Documents. Through strict altitude and route requirements to mitigate noise just to name a few efforts air-tour operators are continually working to ensure they are responsible stewards of the environment.

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For individuals and groups with disabilities, aerial tourism provides the access promised in the mission of the NPS. The Memorial should be available for all visitors to enjoy. Limiting flights within the memorial boundary unfairly limits the elderly, very young, handicapped, and others who wish to experience the memorial. Limiting flights over the Memorial restricts access for those who might not have the time, resources, or physical ability to see the memorial any other way.

The NPS cannot independently drive the ATMP process behind closed doors. I strongly urge you to consult with the stakeholders, operators and NPOAG on the further development of the ATMPs to collaboratively address the concerns as an alternative to the current flawed approach.

Correspondence ID:	29	Project: 97377	Document:	123303
Name:	Moore, David			
Received:	Sep,18 2022 21:01:39			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

NPOAG guidance is critical to the safety and economic stability of the air tour industry while balancing the needs of the environment, tribal interests, the NPS, and the FAA. Excluding NPOAG in the ATMP process is negligent and violates congressional intent.

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Aerial tourism at Mt. Rushmore dates back to the 1960s. The economic impact these plans will have on the existing air tour companies threatens to shut down businesses that have been operating safely and responsibly for the past 30 years. This impact has reverberating consequences for the local and state economy, both of which are required elements of consideration and have been ignored.

Aerial tourism provides significant workforce development opportunities that support other sectors of the vertical lift industry to include firefighting and emergency medical services. The elimination of this workforce pool would exacerbate current pilot shortages and have impacts well beyond the limited footprint of the Mt Rushmore National Memorial.

The proposed options suggest flight allocation numbers that do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change, and NPS should in good faith respect that dynamic, as visitors alter their destinations and activities according to those trends.

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The NPS cannot independently drive the ATMP process behind closed doors. I strongly urge you to consult with the stakeholders, operators and NPOAG on the further development of the ATMPs to collaboratively address the concerns as an alternative to the current flawed approach.

Correspondence ID:	30	Project: 97377	Document:	123303
Name:	Wells, Donald			
Received:	Sep,18 2022 21:05:44			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

NPOAG guidance is critical to the safety and economic stability of the air tour industry while balancing the needs of the environment, tribal interests, the NPS, and the FAA. Excluding NPOAG in the ATMP process is negligent and violates congressional intent.

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Aerial tourism provides significant workforce development opportunities that support other sectors of the vertical lift industry to include firefighting and emergency medical services. The elimination of this workforce pool would exacerbate current pilot shortages and have impacts well beyond the limited footprint of the Mt Rushmore National Memorial.

The proposed options suggest flight allocation numbers that do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change, and NPS should in good faith respect that dynamic, as visitors alter their destinations and activities according to those trends.

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The NPS cannot independently drive the ATMP process behind closed doors. I strongly urge you to consult with the stakeholders, operators and NPOAG on the further development of the ATMPs to collaboratively address the concerns as an alternative to the current flawed approach.

Correspondence ID:	31	Project: 97377	Document:	123303
Name:	Wells, Suzanne			
Received:	Sep,18 2022 21:38:33			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

NPOAG guidance is critical to the safety and economic stability of the air tour industry while balancing the needs of the environment, tribal interests, the NPS, and the FAA. Excluding NPOAG in the ATMP process is negligent and violates congressional intent.

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Correspondence ID:	32	Project: 97377	Document:	123303
Name:	Adams, Robert			
Received:	Sep,19 2022 05:03:23			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

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Correspondence ID:	33	Project: 97377	Document:	123303
Name:	Metzger, Terri			
Received:	Sep,19 2022 07:07:39			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

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By further restricting an already very limited number of allowable air tours, we are reducing the most environmentally responsible access to Mt. Rushmore, which is in opposition to the very goals stated by the NPS in the Public Scoping Documents. Through strict altitude and route requirements to mitigate noise just to name a few efforts air-tour operators are continually working to ensure they are responsible stewards of the environment.

Currently, there are no restrictions or mitigation efforts for other vehicles operating inside the boundaries of Mt. Rushmore. For example, throughout the summer months, heavy motorcycle traffic at the memorial produces far more impact than aerial tourism. A study was completed by the Town of Keystone, adjacent to the memorial that clearly shows this to be the case.

For individuals and groups with disabilities, aerial tourism provides the access promised in the mission of the NPS. The Memorial should be available for all visitors to enjoy. Limiting flights within the memorial boundary unfairly limits the elderly, very young, handicapped, and others who wish to experience the memorial. Limiting flights over the Memorial restricts access for those who might not have the time, resources, or physical ability to see the memorial any other way.

The NPS cannot independently drive the ATMP process behind closed doors. I strongly urge you to consult with the stakeholders, operators and NPOAG on the further development of the ATMPs to collaboratively address the concerns as an alternative to the current flawed approach.

Correspondence ID:	34	Project: 97377	Document:	123303
Name:	Featherston, Mary			
Received:	Sep,19 2022 07:23:48			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

NPOAG guidance is critical to the safety and economic stability of the air tour industry while balancing the needs of the environment, tribal interests, the NPS, and the FAA. Excluding NPOAG in the ATMP process is negligent and violates congressional intent.

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Aerial tourism at Mt. Rushmore dates back to the 1960s. The economic impact these plans will have on the existing air tour companies threatens to shut down businesses that have been operating safely and responsibly for the past 30 years. This impact has reverberating consequences for the local and state economy, both of which are required elements of consideration and have been ignored.

Aerial tourism provides significant workforce development opportunities that support other sectors of the vertical lift industry to include firefighting and emergency medical services. The elimination of this workforce pool would exacerbate current pilot shortages and have impacts well beyond the limited footprint of the Mt Rushmore National Memorial.

The proposed options suggest flight allocation numbers that do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change, and NPS should in good faith respect that dynamic, as visitors alter their destinations and activities according to those trends.

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For individuals and groups with disabilities, aerial tourism provides the access promised in the mission of the NPS. The Memorial should be available for all visitors to enjoy. Limiting flights within the memorial boundary unfairly limits the elderly, very young, handicapped, and others who wish to

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Correspondence ID:	35	Project: 97377	Document:	123303
Name:	Winter, Patricia			
Received:	Sep,19 2022 07:53:03			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

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Correspondence ID:	36	Project: 97377	Document:	123303
Name:	sailors, Judy			
Received:	Sep,19 2022 10:04:13			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

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Correspondence ID:	37	Project: 97377	Document:	123303
Name:	Uhal, Howard			
Received:	Sep,19 2022 10:19:11			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

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Correspondence ID:	38	Project: 97377	Document:	123303
Name:	McKenzie, Scott			
Received:	Sep,19 2022 11:53:12			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

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Correspondence ID:	39	Project: 97377	Document:	123303
Name:	McKenzie, Scott			
Received:	Sep,19 2022 11:53:22			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

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Correspondence ID:	40	Project: 97377	Document:	123303
Name:	Basnight, Kathleen			
Received:	Sep,19 2022 12:02:25			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

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Correspondence ID:	41	Project: 97377	Document:	123303
Name:	Nehls, Ingo			
Received:	Sep,19 2022 13:03:57			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

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Correspondence ID:	42	Project: 97377	Document:	123303
Name:	Lee, Stephen			
Received:	Sep,19 2022 13:07:25			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

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Aerial tourism at Mt. Rushmore dates back to the 1960s. The economic impact these plans will have on the existing air tour companies threatens to shut down businesses that have been operating safely and responsibly for the past 30 years. This impact has reverberating consequences for the local and state economy, both of which are required elements of consideration and have been ignored.

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Currently, there are no restrictions or mitigation efforts for other vehicles operating inside the boundaries of Mt. Rushmore. For example, throughout the summer months, heavy motorcycle traffic at the memorial produces far more impact than aerial tourism. A study was completed by the Town of Keystone, adjacent to the memorial that clearly shows this to be the case.

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Correspondence ID:	43	Project: 97377	Document:	123303
Name:	Volle, Adam			
Received:	Sep,19 2022 13:19:17			
Correspondence Type:	Web Form			

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Correspondence ID:	44	Project: 97377	Document:	123303
Name:	Friedrich-Hupke, Shane			
Received:	Sep,19 2022 13:28:59			
Correspondence Type:	Web Form			

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Correspondence ID:	45	Project: 97377	Document:	123303
Name:	Werth, Mario			
Received:	Sep,19 2022 13:51:46			
Correspondence Type:	Web Form			

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Correspondence ID:	46	Project: 97377	Document:	123303
Name:	Pray, Patricia A			
Received:	Sep,19 2022 14:39:31			
Correspondence Type:	Web Form			

Correspondence: We loved the opportunity to see the view. It should not be eliminated. It has no ecological effect on the monuments nor environment.

Correspondence ID:	47	Project: 97377	Document:	123303
Name:	Clancy, Mike			
Received:	Sep,19 2022 14:48:37			
Correspondence Type:	Web Form			

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Correspondence ID:	48	Project: 97377	Document:	123303
Name:	Markle, Matthew			
Received:	Sep,19 2022 14:50:05			
Correspondence Type:	Web Form			

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Correspondence ID:	49	Project: 97377	Document:	123303
Name:	Wilkins, Malcolm			
Received:	Sep,19 2022 14:50:41			
Correspondence Type:	Web Form			

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Correspondence ID:	50	Project: 97377	Document:	123303
Name:	Diamond, Michelle			
Received:	Sep,19 2022 14:51:10			
Correspondence Type:	Web Form			

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Correspondence ID:	51	Project: 97377	Document:	123303
Name:	Sherlock, Richard			
Received:	Sep,19 2022 14:53:08			
Correspondence Type:	Web Form			

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Aerial tourism at Mt. Rushmore dates back to the 1960s. The economic impact these plans will have on the existing air tour companies threatens to shut down businesses that have been operating safely and responsibly for the past 30 years. This impact has reverberating consequences for the local and state economy, both of which are required elements of consideration and have been ignored.

Aerial tourism provides significant workforce development opportunities that support other sectors of the vertical lift industry to include firefighting and emergency medical services. The elimination of this workforce pool would exacerbate current pilot shortages and have impacts well beyond the limited footprint of the Mt Rushmore National Memorial.

The proposed options suggest flight allocation numbers that do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change, and NPS should in good faith respect that dynamic, as visitors alter their destinations and activities according to those trends.

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By further restricting an already very limited number of allowable air tours, we are reducing the most environmentally responsible access to Mt. Rushmore, which is in opposition to the very goals stated by the NPS in the Public Scoping Documents. Through strict altitude and route requirements to mitigate noise just to name a few efforts air-tour operators are continually working to ensure they are responsible stewards of the environment.

Currently, there are no restrictions or mitigation efforts for other vehicles operating inside the boundaries of Mt. Rushmore. For example, throughout the summer months, heavy motorcycle traffic at the memorial produces far more impact than aerial tourism. A study was completed by the Town of Keystone, adjacent to the memorial that clearly shows this to be the case.

For individuals and groups with disabilities, aerial tourism provides the access promised in the mission of the NPS. The Memorial should be available for all visitors to enjoy. Limiting flights within the memorial boundary unfairly limits the elderly, very young, handicapped, and others who wish to experience the memorial. Limiting flights over the Memorial restricts access for those who might not have the time, resources, or physical ability to see the memorial any other way.

The NPS cannot independently drive the ATMP process behind closed doors. I strongly urge you to consult with the stakeholders, operators and NPOAG on the further development of the ATMPs to collaboratively address the concerns as an alternative to the current flawed approach.

Correspondence ID:	52	Project: 97377	Document:	123303
Name:	Buff, Haylee			
Received:	Sep,19 2022 14:53:20			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

NPOAG guidance is critical to the safety and economic stability of the air tour industry while balancing the needs of the environment, tribal interests, the NPS, and the FAA. Excluding NPOAG in the ATMP process is negligent and violates congressional intent.

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experience the memorial. Limiting flights over the Memorial restricts access for those who might not have the time, resources, or physical ability to see the memorial any other way.

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Correspondence ID:	53	Project: 97377	Document:	123303
Name:	Tuttle, Todd			
Received:	Sep,19 2022 14:53:46			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

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Correspondence ID:	54	Project: 97377	Document:	123303
Name:	Ledbetter, Greg			
Received:	Sep,19 2022 14:56:49			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

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Correspondence ID:	55	Project: 97377	Document:	123303
Name:	Diamond, Christopher			
Received:	Sep,19 2022 14:57:40			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

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Correspondence ID:	56	Project: 97377	Document:	123303
Name:	Mitchell, Sheena			
Received:	Sep,19 2022 14:57:41			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

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Correspondence ID:	57	Project: 97377	Document:	123303
Name:	Darr, Jason			
Received:	Sep,19 2022 15:03:49			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

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Correspondence ID:	58	Project: 97377	Document:	123303
Name:	Chase, Richard			
Received:	Sep,19 2022 15:13:44			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

Having visited Mt Rushmore in the fall of 2021, I can assure you the biggest contributor to unpleasant noise were motorcyclists who feel the need to rev their engines and the inconsiderate people who ran their foul mouths without regard to those in their presence. In the approximately four hours that we were at Mount Rushmore, I did not notice any helicopter noise, and having worked in the helicopter industry for forty years of my life, I can assure you I am attuned to the sound of a helicopter anywhere in my vicinity.

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

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Correspondence ID:	59	Project: 97377	Document:	123303
Name:	Allen, Robert			
Received:	Sep,19 2022 15:27:01			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

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Air tours are a vital option for many visitors providing a once-in-a-lifetime opportunity to experience natural and man-made landmarks. Visitors choosing aerial tourism represent the lowest impact to any park, recreation area, or memorial. Aerial tourism reduces impacts to parks, recreation areas and memorials. Aerial tourism provides the lowest form of impact in the park, leaving absolutely no trace, while reducing congestion and demand on park infrastructure in a significant way. For the NPS to ignore this fact is disingenuous at best.

By further restricting an already very limited number of allowable air tours, we are reducing the most environmentally responsible access to Mt. Rushmore, which is in opposition to the very goals stated by the NPS in the Public Scoping Documents. Through strict altitude and route requirements to mitigate noise just to name a few efforts air-tour operators are continually working to ensure they are responsible stewards of the environment.

Currently, there are no restrictions or mitigation efforts for other vehicles operating inside the boundaries of Mt. Rushmore. For example, throughout the summer months, heavy motorcycle traffic at the memorial produces far more impact than aerial tourism. A study was completed by the Town of Keystone, adjacent to the memorial that clearly shows this to be the case.

For individuals and groups with disabilities, aerial tourism provides the access promised in the mission of the NPS. The Memorial should be available for all visitors to enjoy. Limiting flights within the memorial boundary unfairly limits the elderly, very young, handicapped, and others who wish to experience the memorial. Limiting flights over the Memorial restricts access for those who might not have the time, resources, or physical ability to see the memorial any other way.

The NPS cannot independently drive the ATMP process behind closed doors. I strongly urge you to consult with the stakeholders, operators and NPOAG on the further development of the ATMPs to collaboratively address the concerns as an alternative to the current flawed approach.

Correspondence ID:	60	Project: 97377	Document:	123303
Name:	Dickensheets, John			
Received:	Sep,19 2022 15:29:58			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

NPOAG guidance is critical to the safety and economic stability of the air tour industry while balancing the needs of the environment, tribal interests, the NPS, and the FAA. Excluding NPOAG in the ATMP process is negligent and violates congressional intent.

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Without the expertise and safety input from stakeholders, operators, and the NPOAG, serious safety concerns will arise as the NPS, with no expertise, moves, compresses, combines and shifts flight routes and altitudes that have been in place for years. The very routes in question were designed jointly between operators and the local Park Unit stakeholders.

Aerial tourism at Mt. Rushmore dates back to the 1960s. The economic impact these plans will have on the existing air tour companies threatens to shut down businesses that have been operating safely and responsibly for the past 30 years. This impact has reverberating consequences for the local and state economy, both of which are required elements of consideration and have been ignored.

Aerial tourism provides significant workforce development opportunities that support other sectors of the vertical lift industry to include firefighting and emergency medical services. The elimination of this workforce pool would exacerbate current pilot shortages and have impacts well beyond the limited footprint of the Mt Rushmore National Memorial.

The proposed options suggest flight allocation numbers that do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry

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Correspondence ID:	61	Project: 97377	Document:	123303
Name:	Fein, Tammy			
Received:	Sep,19 2022 15:32:13			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

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Correspondence ID:	62	Project: 97377	Document:	123303
Name:	Buehler, Andrew			
Received:	Sep,19 2022 15:37:43			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

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Correspondence ID:	63	Project: 97377	Document:	123303
Name:	Johnson, Kenneth			
Received:	Sep,19 2022 15:39:40			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

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Correspondence ID:	64	Project: 97377	Document:	123303
Name:	Schwarzbach, Daniel			
Received:	Sep,19 2022 16:08:15			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

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Correspondence ID:	65	Project: 97377	Document:	123303
Name:	Rogers, Robin			
Received:	Sep,19 2022 17:07:57			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

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Correspondence ID:	66	Project: 97377	Document:	123303
Name:	Kulbeth, Jason			
Received:	Sep,19 2022 17:09:41			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

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Correspondence ID:	67	Project: 97377	Document:	123303
Name:	Parks, Brianna			
Received:	Sep,19 2022 17:12:40			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

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The NPS cannot independently drive the ATMP process behind closed doors. I strongly urge you to consult with the stakeholders, operators and NPOAG on the further development of the ATMPs to collaboratively address the concerns as an alternative to the current flawed approach.

Correspondence ID:	68	Project: 97377	Document:	123303
Name:	Mayer, Robert			
Received:	Sep,19 2022 17:19:07			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

NPOAG guidance is critical to the safety and economic stability of the air tour industry while balancing the needs of the environment, tribal interests, the NPS, and the FAA. Excluding NPOAG in the ATMP process is negligent and violates congressional intent.

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Without the expertise and safety input from stakeholders, operators, and the NPOAG, serious safety concerns will arise as the NPS, with no expertise, moves, compresses, combines and shifts flight routes and altitudes that have been in place for years. The very routes in question were designed jointly between operators and the local Park Unit stakeholders.

Aerial tourism at Mt. Rushmore dates back to the 1960s. The economic impact these plans will have on the existing air tour companies threatens to shut down businesses that have been operating safely and responsibly for the past 30 years. This impact has reverberating consequences for the local and state economy, both of which are required elements of consideration and have been ignored.

Aerial tourism provides significant workforce development opportunities that support other sectors of the vertical lift industry to include firefighting and emergency medical services. The elimination of this workforce pool would exacerbate current pilot shortages and have impacts well beyond the limited footprint of the Mt Rushmore National Memorial.

The proposed options suggest flight allocation numbers that do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change, and NPS should in good faith respect that dynamic, as visitors alter their destinations and activities according to those trends.

Air tours are a vital option for many visitors providing a once-in-a-lifetime opportunity to experience natural and man-made landmarks. Visitors choosing aerial tourism represent the lowest impact to any park, recreation area, or memorial. Aerial tourism reduces impacts to parks, recreation areas and memorials. Aerial tourism provides the lowest form of impact in the park, leaving absolutely no trace, while reducing congestion and demand on park infrastructure in a significant way. For the NPS to ignore this fact is disingenuous at best.

By further restricting an already very limited number of allowable air tours, we are reducing the most environmentally responsible access to Mt. Rushmore, which is in opposition to the very goals stated by the NPS in the Public Scoping Documents. Through strict altitude and route requirements to mitigate noise just to name a few efforts air-tour operators are continually working to ensure they are responsible stewards of the environment.

Currently, there are no restrictions or mitigation efforts for other vehicles operating inside the boundaries of Mt. Rushmore. For example, throughout the summer months, heavy motorcycle traffic at the memorial produces far more impact than aerial tourism. A study was completed by the Town of Keystone, adjacent to the memorial that clearly shows this to be the case.

For individuals and groups with disabilities, aerial tourism provides the access promised in the mission of the NPS. The Memorial should be available for all visitors to enjoy. Limiting flights within the memorial boundary unfairly limits the elderly, very young, handicapped, and others who wish to experience the memorial. Limiting flights over the Memorial restricts access for those who might not have the time, resources, or physical ability to see the memorial any other way.

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Correspondence ID:	69	Project: 97377	Document:	123303
Name:	Dickerson, Richard			
Received:	Sep,19 2022 17:20:49			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

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Correspondence ID:	70	Project: 97377	Document:	123303
Name:	Darling, Barbara			
Received:	Sep,19 2022 18:01:18			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

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Correspondence ID:	71	Project: 97377	Document:	123303
Name:	Demeter, Daniel			
Received:	Sep,19 2022 18:22:36			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

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Correspondence ID:	72	Project: 97377	Document:	123303
Name:	Castillo, Randy			
Received:	Sep,19 2022 18:40:17			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

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Correspondence ID:	73	Project: 97377	Document:	123303
Name:	Bratkovics, David			
Received:	Sep,19 2022 18:42:29			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

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Correspondence ID:	74	Project: 97377	Document:	123303
Name:	Larsen, Susanne			
Received:	Sep,19 2022 19:07:12			
Correspondence Type:	Web Form			

Correspondence: I would like to preface the below email by saying that I was fortunate enough to be an employee at a helicopter tour company in the Black Hills all through high school and college. Not only did I value and appreciate tourism, I also gained a real appreciation for aerial adventures. One of our most popular tours we offered was of Mt. Rushmore. The amount of joy our tours brought to peoples vacations were countless. It was an amazing experience to view Mt Rushmore from the air, and it added another level of awe to the historic monument. It is disappointing to think that others in the future would possibly not have that experience. Congress and the powers that be have plenty of other things in our country to prioritize beyond touristic scenic views. Please turn your sights on the actual needs of our country, and avoid pulling non-existent problems out of literal thin air.

Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

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Correspondence ID:	75	Project: 97377	Document:	123303
Name:	Schofield, Jennifer			
Received:	Sep,19 2022 19:38:14			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

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Correspondence ID:	76	Project: 97377	Document:	123303
Name:	McDonald, Ryan			
Received:	Sep,19 2022 19:58:29			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

NPOAG guidance is critical to the safety and economic stability of the air tour industry while balancing the needs of the environment, tribal interests, the NPS, and the FAA. Excluding NPOAG in the ATMP process is negligent and violates congressional intent.

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Aerial tourism at Mt. Rushmore dates back to the 1960s. The economic impact these plans will have on the existing air tour companies threatens to shut down businesses that have been operating safely and responsibly for the past 30 years. This impact has reverberating consequences for the local and state economy, both of which are required elements of consideration and have been ignored.

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The NPS cannot independently drive the ATMP process behind closed doors. I strongly urge you to consult with the stakeholders, operators and NPOAG on the further development of the ATMPs to collaboratively address the concerns as an alternative to the current flawed approach.

Correspondence ID:	77	Project: 97377	Document:	123303
Name:	Wilson, Michael			
Received:	Sep,19 2022 20:35:23			
Correspondence Type:	Web Form			

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Correspondence ID:	78	Project: 97377	Document:	123303
Name:	Fronk, Colten			
Received:	Sep,19 2022 20:53:45			
Correspondence Type:	Web Form			

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Correspondence ID:	79	Project: 97377	Document:	123303
Name:	Adams, Daniel			
Received:	Sep,19 2022 21:27:51			
Correspondence Type:	Web Form			

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Correspondence ID:	80	Project: 97377	Document:	123303
Name:	Jacob, Michael			
Received:	Sep,19 2022 21:28:33			
Correspondence Type:	Web Form			

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Correspondence ID:	81	Project: 97377	Document:	123303
Name:	Kendall, John			
Received:	Sep,19 2022 21:54:35			
Correspondence Type:	Web Form			

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Correspondence ID:	82	Project: 97377	Document:	123303
Name:	Chartrand, Walter			
Received:	Sep,19 2022 22:00:02			
Correspondence Type:	Web Form			

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Correspondence ID:	83	Project: 97377	Document:	123303
Name:	Lazo, Kristoffer			
Received:	Sep,19 2022 22:05:55			
Correspondence Type:	Web Form			

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Correspondence ID:	84	Project: 97377	Document:	123303
Name:	Moser, Jake			
Received:	Sep,20 2022 05:45:16			
Correspondence Type:	Web Form			

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marketing trends change, and NPS should in good faith respect that dynamic, as visitors alter their destinations and activities according to those trends.

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By further restricting an already very limited number of allowable air tours, we are reducing the most environmentally responsible access to Mt. Rushmore, which is in opposition to the very goals stated by the NPS in the Public Scoping Documents. Through strict altitude and route requirements to mitigate noise just to name a few efforts air-tour operators are continually working to ensure they are responsible stewards of the environment.

Currently, there are no restrictions or mitigation efforts for other vehicles operating inside the boundaries of Mt. Rushmore. For example, throughout the summer months, heavy motorcycle traffic at the memorial produces far more impact than aerial tourism. A study was completed by the Town of Keystone, adjacent to the memorial that clearly shows this to be the case.

For individuals and groups with disabilities, aerial tourism provides the access promised in the mission of the NPS. The Memorial should be available for all visitors to enjoy. Limiting flights within the memorial boundary unfairly limits the elderly, very young, handicapped, and others who wish to experience the memorial. Limiting flights over the Memorial restricts access for those who might not have the time, resources, or physical ability to see the memorial any other way.

The NPS cannot independently drive the ATMP process behind closed doors. I strongly urge you to consult with the stakeholders, operators and NPOAG on the further development of the ATMPs to collaboratively address the concerns as an alternative to the current flawed approach.

Correspondence ID:	85	Project: 97377	Document:	123303
Name:	Lay, Jerry			
Received:	Sep,20 2022 06:42:04			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

NPOAG guidance is critical to the safety and economic stability of the air tour industry while balancing the needs of the environment, tribal interests, the NPS, and the FAA. Excluding NPOAG in the ATMP process is negligent and violates congressional intent.

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Aerial tourism at Mt. Rushmore dates back to the 1960s. The economic impact these plans will have on the existing air tour companies threatens to shut down businesses that have been operating safely and responsibly for the past 30 years. This impact has reverberating consequences for the local and state economy, both of which are required elements of consideration and have been ignored.

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Correspondence ID:	86	Project: 97377	Document:	123303
Name:	Settembrino, Christopher			
Received:	Sep,20 2022 07:03:45			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

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Correspondence ID:	87	Project: 97377	Document:	123303
Name:	Carver, Brittney			
Received:	Sep,20 2022 07:17:45			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

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Correspondence ID:	88	Project: 97377	Document:	123303
Name:	fisher, matthew			
Received:	Sep,20 2022 07:24:29			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

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Correspondence ID:	89	Project: 97377	Document:	123303
Name:	Van Dell, Wesley			
Received:	Sep,20 2022 07:38:52			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

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Correspondence ID:	90	Project: 97377	Document:	123303
Name:	Carver, Tyler			
Received:	Sep,20 2022 08:18:51			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

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Correspondence ID:	91	Project: 97377	Document:	123303
Name:	Buehler, Andrew			
Received:	Sep,20 2022 09:27:50			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

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Correspondence ID:	92	Project: 97377	Document:	123303
Name:	,			
Received:	Sep,20 2022 09:51:04			
Correspondence Type:	Web Form			

Correspondence: Motor cycles are much louder than these helicopters !!!

I Believe this service is necessary for patron's to use !!

Easier to explore this national park !!!

Correspondence ID:	93	Project: 97377	Document:	123303
Name:	Kays, Heather			
Received:	Sep,20 2022 09:56:05			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

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For individuals and groups with disabilities, aerial tourism provides the access promised in the mission of the NPS. The Memorial should be available for all visitors to enjoy. Limiting flights within the memorial boundary unfairly limits the elderly, very young, handicapped, and others who wish to experience the memorial. Limiting flights over the Memorial restricts access for those who might not have the time, resources, or physical ability to see the memorial any other way.

The NPS cannot independently drive the ATMP process behind closed doors. I strongly urge you to consult with the stakeholders, operators and NPOAG on the further development of the ATMPs to collaboratively address the concerns as an alternative to the current flawed approach.

Correspondence ID:	94	Project: 97377	Document:	123303
Name:	Chicosky, Tracey			
Received:	Sep,20 2022 11:04:08			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

NPOAG guidance is critical to the safety and economic stability of the air tour industry while balancing the needs of the environment, tribal interests, the NPS, and the FAA. Excluding NPOAG in the ATMP process is negligent and violates congressional intent.

The Public Scoping Documents serve to pre-shape public comment by offering options with no justification or data to support the offerings. This is a terribly flawed process, moving forward without critical NPOAG input, to produce an agency desired outcome.

Without the expertise and safety input from stakeholders, operators, and the NPOAG, serious safety concerns will arise as the NPS, with no expertise, moves, compresses, combines and shifts flight routes and altitudes that have been in place for years. The very routes in question were designed jointly between operators and the local Park Unit stakeholders.

Aerial tourism at Mt. Rushmore dates back to the 1960s. The economic impact these plans will have on the existing air tour companies threatens to shut down businesses that have been operating safely and responsibly for the past 30 years. This impact has reverberating consequences for the local and state economy, both of which are required elements of consideration and have been ignored.

Aerial tourism provides significant workforce development opportunities that support other sectors of the vertical lift industry to include firefighting and emergency medical services. The elimination of this workforce pool would exacerbate current pilot shortages and have impacts well beyond the limited footprint of the Mt Rushmore National Memorial.

The proposed options suggest flight allocation numbers that do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change, and NPS should in good faith respect that dynamic, as visitors alter their destinations and activities according to those trends.

Air tours are a vital option for many visitors providing a once-in-a-lifetime opportunity to experience natural and man-made landmarks. Visitors choosing aerial tourism represent the lowest impact to any park, recreation area, or memorial. Aerial tourism reduces impacts to parks, recreation areas and memorials. Aerial tourism provides the lowest form of impact in the park, leaving absolutely no trace, while reducing congestion and demand on park infrastructure in a significant way. For the NPS to ignore this fact is disingenuous at best.

By further restricting an already very limited number of allowable air tours, we are reducing the most environmentally responsible access to Mt. Rushmore, which is in opposition to the very goals stated by the NPS in the Public Scoping Documents. Through strict altitude and route requirements to mitigate noise just to name a few efforts air-tour operators are continually working to ensure they are responsible stewards of the environment.

Currently, there are no restrictions or mitigation efforts for other vehicles operating inside the boundaries of Mt. Rushmore. For example, throughout the summer months, heavy motorcycle traffic at the memorial produces far more impact than aerial tourism. A study was completed by the Town of Keystone, adjacent to the memorial that clearly shows this to be the case.

For individuals and groups with disabilities, aerial tourism provides the access promised in the mission of the NPS. The Memorial should be available for all visitors to enjoy. Limiting flights within the memorial boundary unfairly limits the elderly, very young, handicapped, and others who wish to experience the memorial. Limiting flights over the Memorial restricts access for those who might not have the time, resources, or physical ability to see the memorial any other way.

The NPS cannot independently drive the ATMP process behind closed doors. I strongly urge you to consult with the stakeholders, operators and NPOAG on the further development of the ATMPs to collaboratively address the concerns as an alternative to the current flawed approach.

Correspondence ID:	95	Project: 97377	Document:	123303
Name:	Roth, Brian			
Received:	Sep,20 2022 11:12:08			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

NPOAG guidance is critical to the safety and economic stability of the air tour industry while balancing the needs of the environment, tribal interests, the NPS, and the FAA. Excluding NPOAG in the ATMP process is negligent and violates congressional intent.

The Public Scoping Documents serve to pre-shape public comment by offering options with no justification or data to support the offerings. This is a terribly flawed process, moving forward without critical NPOAG input, to produce an agency desired outcome.

Without the expertise and safety input from stakeholders, operators, and the NPOAG, serious safety concerns will arise as the NPS, with no expertise, moves, compresses, combines and shifts flight routes and altitudes that have been in place for years. The very routes in question were designed jointly between operators and the local Park Unit stakeholders.

Aerial tourism at Mt. Rushmore dates back to the 1960s. The economic impact these plans will have on the existing air tour companies threatens to shut down businesses that have been operating safely and responsibly for the past 30 years. This impact has reverberating consequences for the local and state economy, both of which are required elements of consideration and have been ignored.

Aerial tourism provides significant workforce development opportunities that support other sectors of the vertical lift industry to include firefighting and emergency medical services. The elimination of this workforce pool would exacerbate current pilot shortages and have impacts well beyond the limited footprint of the Mt Rushmore National Memorial.

The proposed options suggest flight allocation numbers that do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change, and NPS should in good faith respect that dynamic, as visitors alter their destinations and activities according to those trends.

Air tours are a vital option for many visitors providing a once-in-a-lifetime opportunity to experience natural and man-made landmarks. Visitors choosing aerial tourism represent the lowest impact to any park, recreation area, or memorial. Aerial tourism reduces impacts to parks, recreation areas and memorials. Aerial tourism provides the lowest form of impact in the park, leaving absolutely no trace, while reducing congestion and demand on park infrastructure in a significant way. For the NPS to ignore this fact is disingenuous at best.

By further restricting an already very limited number of allowable air tours, we are reducing the most environmentally responsible access to Mt. Rushmore, which is in opposition to the very goals stated by the NPS in the Public Scoping Documents. Through strict altitude and route requirements to mitigate noise just to name a few efforts air-tour operators are continually working to ensure they are responsible stewards of the environment.

Currently, there are no restrictions or mitigation efforts for other vehicles operating inside the boundaries of Mt. Rushmore. For example, throughout the summer months, heavy motorcycle traffic at the memorial produces far more impact than aerial tourism. A study was completed by the Town of Keystone, adjacent to the memorial that clearly shows this to be the case.

For individuals and groups with disabilities, aerial tourism provides the access promised in the mission of the NPS. The Memorial should be available for all visitors to enjoy. Limiting flights within the memorial boundary unfairly limits the elderly, very young, handicapped, and others who wish to experience the memorial. Limiting flights over the Memorial restricts access for those who might not have the time, resources, or physical ability to see the memorial any other way.

The NPS cannot independently drive the ATMP process behind closed doors. I strongly urge you to consult with the stakeholders, operators and NPOAG on the further development of the ATMPs to collaboratively address the concerns as an alternative to the current flawed approach.

Correspondence ID:	96	Project: 97377	Document:	123303
Name:	Rassi, Jason			
Received:	Sep,20 2022 11:16:16			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

NPOAG guidance is critical to the safety and economic stability of the air tour industry while balancing the needs of the environment, tribal interests, the NPS, and the FAA. Excluding NPOAG in the ATMP process is negligent and violates congressional intent.

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Without the expertise and safety input from stakeholders, operators, and the NPOAG, serious safety concerns will arise as the NPS, with no expertise, moves, compresses, combines and shifts flight routes and altitudes that have been in place for years. The very routes in question were designed jointly between operators and the local Park Unit stakeholders.

Aerial tourism at Mt. Rushmore dates back to the 1960s. The economic impact these plans will have on the existing air tour companies threatens to shut down businesses that have been operating safely and responsibly for the past 30 years. This impact has reverberating consequences for the local and state economy, both of which are required elements of consideration and have been ignored.

Aerial tourism provides significant workforce development opportunities that support other sectors of the vertical lift industry to include firefighting and emergency medical services. The elimination of this workforce pool would exacerbate current pilot shortages and have impacts well beyond the limited footprint of the Mt Rushmore National Memorial.

The proposed options suggest flight allocation numbers that do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change, and NPS should in good faith respect that dynamic, as visitors alter their destinations and activities according to those trends.

Air tours are a vital option for many visitors providing a once-in-a-lifetime opportunity to experience natural and man-made landmarks. Visitors choosing aerial tourism represent the lowest impact to any park, recreation area, or memorial. Aerial tourism reduces impacts to parks, recreation areas and memorials. Aerial tourism provides the lowest form of impact in the park, leaving absolutely no trace, while reducing congestion and demand on park infrastructure in a significant way. For the NPS to ignore this fact is disingenuous at best.

By further restricting an already very limited number of allowable air tours, we are reducing the most environmentally responsible access to Mt. Rushmore, which is in opposition to the very goals stated by the NPS in the Public Scoping Documents. Through strict altitude and route requirements to mitigate noise just to name a few efforts air-tour operators are continually working to ensure they are responsible stewards of the environment.

Currently, there are no restrictions or mitigation efforts for other vehicles operating inside the boundaries of Mt. Rushmore. For example, throughout the summer months, heavy motorcycle traffic at the memorial produces far more impact than aerial tourism. A study was completed by the Town of Keystone, adjacent to the memorial that clearly shows this to be the case.

For individuals and groups with disabilities, aerial tourism provides the access promised in the mission of the NPS. The Memorial should be available for all visitors to enjoy. Limiting flights within the memorial boundary unfairly limits the elderly, very young, handicapped, and others who wish to experience the memorial. Limiting flights over the Memorial restricts access for those who might not have the time, resources, or physical ability to see the memorial any other way.

The NPS cannot independently drive the ATMP process behind closed doors. I strongly urge you to consult with the stakeholders, operators and NPOAG on the further development of the ATMPs to collaboratively address the concerns as an alternative to the current flawed approach.

Correspondence ID:	97	Project: 97377	Document:	123303
Name:	Byland, James			
Received:	Sep,20 2022 11:24:42			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

NPOAG guidance is critical to the safety and economic stability of the air tour industry while balancing the needs of the environment, tribal interests, the NPS, and the FAA. Excluding NPOAG in the ATMP process is negligent and violates congressional intent.

The Public Scoping Documents serve to pre-shape public comment by offering options with no justification or data to support the offerings. This is a terribly flawed process, moving forward without critical NPOAG input, to produce an agency desired outcome.

Without the expertise and safety input from stakeholders, operators, and the NPOAG, serious safety concerns will arise as the NPS, with no expertise, moves, compresses, combines and shifts flight routes and altitudes that have been in place for years. The very routes in question were designed jointly between operators and the local Park Unit stakeholders.

Aerial tourism at Mt. Rushmore dates back to the 1960s. The economic impact these plans will have on the existing air tour companies threatens to shut down businesses that have been operating safely and responsibly for the past 30 years. This impact has reverberating consequences for the local and state economy, both of which are required elements of consideration and have been ignored.

Aerial tourism provides significant workforce development opportunities that support other sectors of the vertical lift industry to include firefighting and emergency medical services. The elimination of this workforce pool would exacerbate current pilot shortages and have impacts well beyond the limited footprint of the Mt Rushmore National Memorial.

The proposed options suggest flight allocation numbers that do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change, and NPS should in good faith respect that dynamic, as visitors alter their destinations and activities according to those trends.

Air tours are a vital option for many visitors providing a once-in-a-lifetime opportunity to experience natural and man-made landmarks. Visitors choosing aerial tourism represent the lowest impact to any park, recreation area, or memorial. Aerial tourism reduces impacts to parks, recreation areas and memorials. Aerial tourism provides the lowest form of impact in the park, leaving absolutely no trace, while reducing congestion and demand on park infrastructure in a significant way. For the NPS to ignore this fact is disingenuous at best.

By further restricting an already very limited number of allowable air tours, we are reducing the most environmentally responsible access to Mt. Rushmore, which is in opposition to the very goals stated by the NPS in the Public Scoping Documents. Through strict altitude and route requirements to mitigate noise just to name a few efforts air-tour operators are continually working to ensure they are responsible stewards of the environment.

Currently, there are no restrictions or mitigation efforts for other vehicles operating inside the boundaries of Mt. Rushmore. For example, throughout the summer months, heavy motorcycle traffic at the memorial produces far more impact than aerial tourism. A study was completed by the Town of Keystone, adjacent to the memorial that clearly shows this to be the case.

For individuals and groups with disabilities, aerial tourism provides the access promised in the mission of the NPS. The Memorial should be available for all visitors to enjoy. Limiting flights within the memorial boundary unfairly limits the elderly, very young, handicapped, and others who wish to experience the memorial. Limiting flights over the Memorial restricts access for those who might not have the time, resources, or physical ability to see the memorial any other way.

The NPS cannot independently drive the ATMP process behind closed doors. I strongly urge you to consult with the stakeholders, operators and NPOAG on the further development of the ATMPs to collaboratively address the concerns as an alternative to the current flawed approach.

Correspondence ID:	98	Project: 97377	Document:	123303
Name:	Stark, John			
Received:	Sep,20 2022 15:13:13			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

NPOAG guidance is critical to the safety and economic stability of the air tour industry while balancing the needs of the environment, tribal interests, the NPS, and the FAA. Excluding NPOAG in the ATMP process is negligent and violates congressional intent.

The Public Scoping Documents serve to pre-shape public comment by offering options with no justification or data to support the offerings. This is a terribly flawed process, moving forward without critical NPOAG input, to produce an agency desired outcome.

Without the expertise and safety input from stakeholders, operators, and the NPOAG, serious safety concerns will arise as the NPS, with no expertise, moves, compresses, combines and shifts flight routes and altitudes that have been in place for years. The very routes in question were designed jointly between operators and the local Park Unit stakeholders.

Aerial tourism at Mt. Rushmore dates back to the 1960s. The economic impact these plans will have on the existing air tour companies threatens to shut down businesses that have been operating safely and responsibly for the past 30 years. This impact has reverberating consequences for the local and state economy, both of which are required elements of consideration and have been ignored.

Aerial tourism provides significant workforce development opportunities that support other sectors of the vertical lift industry to include firefighting and emergency medical services. The elimination of this workforce pool would exacerbate current pilot shortages and have impacts well beyond the limited footprint of the Mt Rushmore National Memorial.

The proposed options suggest flight allocation numbers that do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry

marketing trends change, and NPS should in good faith respect that dynamic, as visitors alter their destinations and activities according to those trends.

Air tours are a vital option for many visitors providing a once-in-a-lifetime opportunity to experience natural and man-made landmarks. Visitors choosing aerial tourism represent the lowest impact to any park, recreation area, or memorial. Aerial tourism reduces impacts to parks, recreation areas and memorials. Aerial tourism provides the lowest form of impact in the park, leaving absolutely no trace, while reducing congestion and demand on park infrastructure in a significant way. For the NPS to ignore this fact is disingenuous at best.

By further restricting an already very limited number of allowable air tours, we are reducing the most environmentally responsible access to Mt. Rushmore, which is in opposition to the very goals stated by the NPS in the Public Scoping Documents. Through strict altitude and route requirements to mitigate noise just to name a few efforts air-tour operators are continually working to ensure they are responsible stewards of the environment.

Currently, there are no restrictions or mitigation efforts for other vehicles operating inside the boundaries of Mt. Rushmore. For example, throughout the summer months, heavy motorcycle traffic at the memorial produces far more impact than aerial tourism. A study was completed by the Town of Keystone, adjacent to the memorial that clearly shows this to be the case.

For individuals and groups with disabilities, aerial tourism provides the access promised in the mission of the NPS. The Memorial should be available for all visitors to enjoy. Limiting flights within the memorial boundary unfairly limits the elderly, very young, handicapped, and others who wish to experience the memorial. Limiting flights over the Memorial restricts access for those who might not have the time, resources, or physical ability to see the memorial any other way.

The NPS cannot independently drive the ATMP process behind closed doors. I strongly urge you to consult with the stakeholders, operators and NPOAG on the further development of the ATMPs to collaboratively address the concerns as an alternative to the current flawed approach.

Correspondence ID:	99	Project: 97377	Document:	123303
Name:	Gonzalez, Tristan			
Received:	Sep,20 2022 16:18:58			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators, and the National Parks Overflight Advisory Group (POAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

NPOAG guidance is critical to the safety and economic stability of the air tour industry while balancing the needs of the environment, tribal interests, the NPS, and the FAA. Therefore, excluding NPOAG in the ATMP process is negligent and violates congressional intent.

The Public Scoping Documents serve to pre-shape public comment by offering options with no justification or data to support the offerings. This is a flawed process, moving forward without critical NPOAG input to produce an agency's desired outcome.

Without the expertise and safety input from stakeholders, operators, and the NPOAG, serious safety concerns will arise as the NPS, with no expertise, moves, compresses, combines, and shifts flight routes and altitudes that have been in place for years. Moreover, the same ways were designed jointly between operators and the local Park Unit stakeholders.

Aerial tourism at Mt. Rushmore dates back to the 1960s. The economic impact these plans will have on the existing air tour companies threatens to shut down businesses operating safely and responsibly for the past 30 years. This impact has reverberating consequences for the local and state economy, both of which are required elements of consideration and have been ignored.

Aerial tourism provides significant workforce development opportunities that support other vertical lift industry sectors, including firefighting and emergency medical services. The elimination of this workforce pool would exacerbate current pilot shortages and have impacts well beyond the limited footprint of the Mt Rushmore National Memorial.

The proposed options suggest flight allocation numbers that do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change, and NPS should, in good faith, respect that dynamic, as visitors alter their destinations and activities according to those trends.

Air tours are a vital option for many visitors providing a once-in-a-lifetime opportunity to experience natural and man-made landmarks. Visitors choosing aerial tourism represent the lowest impact on any park, recreation area, or Memorial. Aerial tourism reduces the effects on parks, recreation areas, and memorials. Aerial tourism provides the lowest impact on the playground, leaving absolutely no trace while significantly lowering congestion and demand on park infrastructure. For the NPS to ignore this fact is disingenuous at best.

By further restricting an already minimal number of allowable air tours, we are reducing the most environmentally responsible access to Mt. Rushmore, which contradicts the goals stated by the NPS in the Public Scoping Documents. Through strict altitude and route requirements to mitigate noise to name a few efforts air-tour operators are continually working to ensure they are responsible stewards of the environment.

Currently, there are no restrictions or mitigation efforts for other vehicles operating inside the boundaries of Mt. Rushmore. For example, heavy motorcycle traffic at the Memorial produces far more impact than aerial tourism throughout the summer months. A study was completed by the Town of Keystone, adjacent to the Memorial, that clearly shows this to be the case.

For individuals and groups with disabilities, aerial tourism provides the access promised in the mission of the NPS. The Memorial should be available for all visitors to enjoy. Limiting flights within the memorial boundary unfairly limits the elderly, very young, handicapped, and others who wish to experience the Memorial. Limiting flights over the Memorial restricts access for those who might not have the time, resources, or physical ability to see the Memorial any other way.

The NPS cannot independently drive the ATMP process behind closed doors. Therefore, I strongly urge you to consult with the stakeholders, operators, and NPOAG on the further development of the ATMPs to collaboratively address the concerns as an alternative to the current flawed approach.

Correspondence ID:	100	Project: 97377	Document:	123303
Name:	Zimmerman, Gene			
Received:	Sep,20 2022 18:59:38			
Correspondence Type:	Web Form			
Correspondence:	To whom it may concern:			

Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

NPOAG guidance is critical to the safety and economic stability of the air tour industry while balancing the needs of the environment, tribal interests, the NPS, and the FAA. Excluding NPOAG in the ATMP process is negligent and violates congressional intent.

The Public Scoping Documents serve to pre-shape public comment by offering options with no justification or data to support the offerings. This is a terribly flawed process, moving forward without critical NPOAG input, to produce an agency desired outcome.

Without the expertise and safety input from stakeholders, operators, and the NPOAG, serious safety concerns will arise as the NPS, with no expertise, moves, compresses, combines and shifts flight routes and altitudes that have been in place for years. The very routes in question were designed jointly between operators and the local Park Unit stakeholders.

Aerial tourism at Mt. Rushmore dates back to the 1960s. The economic impact these plans will have on the existing air tour companies threatens to shut down businesses that have been operating safely and responsibly for the past 30 years. This impact has reverberating consequences for the local and state economy, both of which are required elements of consideration and have been ignored.

Aerial tourism provides significant workforce development opportunities that support other sectors of the vertical lift industry to include firefighting and emergency medical services. The elimination of this workforce pool would exacerbate current pilot shortages and have impacts well beyond the limited footprint of the Mt Rushmore National Memorial.

The proposed options suggest flight allocation numbers that do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change, and NPS should in good faith respect that dynamic, as visitors alter their destinations and activities according to those trends.

Air tours are a vital option for many visitors providing a once-in-a-lifetime opportunity to experience natural and man-made landmarks. Visitors choosing aerial tourism represent the lowest impact to any park, recreation area, or memorial. Aerial tourism reduces impacts to parks, recreation areas and memorials. Aerial tourism provides the lowest form of impact in the park, leaving absolutely no trace, while reducing congestion and demand on park infrastructure in a significant way. For the NPS to ignore this fact is disingenuous at best.

By further restricting an already very limited number of allowable air tours, we are reducing the most environmentally responsible access to Mt. Rushmore, which is in opposition to the very goals stated by the NPS in the Public Scoping Documents. Through strict altitude and route requirements to mitigate noise just to name a few efforts air-tour operators are continually working to ensure they are responsible stewards of the environment.

Currently, there are no restrictions or mitigation efforts for other vehicles operating inside the boundaries of Mt. Rushmore. For example, throughout the summer months, heavy motorcycle traffic at the memorial produces far more impact than aerial tourism. A study was completed by the Town of Keystone, adjacent to the memorial that clearly shows this to be the case.

For individuals and groups with disabilities, aerial tourism provides the access promised in the mission of the NPS. The Memorial should be available for all visitors to enjoy. Limiting flights within the memorial boundary unfairly limits the elderly, very young, handicapped, and others who wish to experience the memorial. Limiting flights over the Memorial restricts access for those who might not have the time, resources, or physical ability to see the memorial any other way.

The NPS cannot independently drive the ATMP process behind closed doors. I strongly urge you to consult with the stakeholders, operators and NPOAG on the further development of the ATMPs to collaboratively address the concerns as an alternative to the current flawed approach.

Correspondence ID:	101	Project: 97377	Document:	123303
Name:	Leininger, John			
Received:	Sep,21 2022 09:00:08			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

NPOAG guidance is critical to the safety and economic stability of the air tour industry while balancing the needs of the environment, tribal interests, the NPS, and the FAA. Excluding NPOAG in the ATMP process is negligent and violates congressional intent.

The Public Scoping Documents serve to pre-shape public comment by offering options with no justification or data to support the offerings. This is a terribly flawed process, moving forward without critical NPOAG input, to produce an agency desired outcome.

Without the expertise and safety input from stakeholders, operators, and the NPOAG, serious safety concerns will arise as the NPS, with no expertise, moves, compresses, combines and shifts flight routes and altitudes that have been in place for years. The very routes in question were designed jointly between operators and the local Park Unit stakeholders.

Aerial tourism at Mt. Rushmore dates back to the 1960s. The economic impact these plans will have on the existing air tour companies threatens to shut down businesses that have been operating safely and responsibly for the past 30 years. This impact has reverberating consequences for the local and state economy, both of which are required elements of consideration and have been ignored.

Aerial tourism provides significant workforce development opportunities that support other sectors of the vertical lift industry to include firefighting and emergency medical services. The elimination of this workforce pool would exacerbate current pilot shortages and have impacts well beyond the limited footprint of the Mt Rushmore National Memorial.

The proposed options suggest flight allocation numbers that do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change, and NPS should in good faith respect that dynamic, as visitors alter their destinations and activities according to those trends.

Air tours are a very vital option for many visitors providing a once-in-a-lifetime opportunity to experience natural and man-made landmarks. Visitors choosing aerial tourism represent the lowest

impact to any park, recreation area, or memorial. Aerial tourism reduces impacts to parks, recreation areas and memorials. Aerial tourism provides the lowest form of impact in the park, leaving absolutely no trace, while reducing congestion and demand on park infrastructure in a significant way. For the NPS to ignore this fact is disingenuous at best.

By further restricting an already very limited number of allowable air tours, we are reducing the most environmentally responsible access to Mt. Rushmore, which is in opposition to the very goals stated by the NPS in the Public Scoping Documents. Through strict altitude and route requirements to mitigate noise just to name a few efforts air-tour operators are continually working to ensure they are responsible stewards of the environment.

Currently, there are no restrictions or mitigation efforts for other vehicles operating inside the boundaries of Mt. Rushmore. For example, throughout the summer months, heavy motorcycle traffic at the memorial produces far more impact than aerial tourism. A study was completed by the Town of Keystone, adjacent to the memorial that clearly shows this to be the case.

For individuals and groups with disabilities, aerial tourism provides the access promised in the mission of the NPS. The Memorial should be available for all visitors to enjoy. Limiting flights within the memorial boundary unfairly limits the elderly, very young, handicapped, and others who wish to experience the memorial. Limiting flights over the Memorial restricts access for those who might not have the time, resources, or physical ability to see the memorial any other way.

The NPS cannot independently drive the ATMP process behind closed doors. I strongly urge you to consult with the stakeholders, operators and NPOAG on the further development of the ATMPs to collaboratively address the concerns as an alternative to the current flawed approach.

Correspondence ID:	102	Project: 97377	Document:	123303
Name:	,			
Received:	Sep,21 2022 12:31:55			
Correspondence Type:	Web Form			

Correspondence: As a resident of Custer, Sd and the Black Hills, I believe that Mount Rushmore and the Badlands National Park are paramount for the survival of our community. With that said, not all folks have the ability to fully enjoy the magic that these special places provide us, due to old age or disabilities. Air tours provide these folks the ability to see and experiences these places in ways they would other wise not be able to. With air tours being a very low impact way to explore the parks, I would hope you do consider my request to leave the restrictions as they are. The money that is brought into our communities and local businesses by the air tours is paramount.

Correspondence ID:	103	Project: 97377	Document:	123303
Name:	Rierner, Christopher			
Received:	Sep,21 2022 14:15:55			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

NPOAG guidance is critical to the safety and economic stability of the air tour industry while balancing the needs of the environment, tribal interests, the NPS, and the FAA. Excluding NPOAG in the ATMP process is negligent and violates congressional intent.

The Public Scoping Documents serve to pre-shape public comment by offering options with no justification or data to support the offerings. This is a terribly flawed process, moving forward without critical NPOAG input, to produce an agency desired outcome.

Without the expertise and safety input from stakeholders, operators, and the NPOAG, serious safety concerns will arise as the NPS, with no expertise, moves, compresses, combines and shifts flight routes and altitudes that have been in place for years. The very routes in question were designed jointly between operators and the local Park Unit stakeholders.

Aerial tourism at Mt. Rushmore dates back to the 1960s. The economic impact these plans will have on the existing air tour companies threatens to shut down businesses that have been operating safely and responsibly for the past 30 years. This impact has reverberating consequences for the local and state economy, both of which are required elements of consideration and have been ignored.

Aerial tourism provides significant workforce development opportunities that support other sectors of the vertical lift industry to include firefighting and emergency medical services. The elimination of this workforce pool would exacerbate current pilot shortages and have impacts well beyond the limited footprint of the Mt Rushmore National Memorial.

The proposed options suggest flight allocation numbers that do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change, and NPS should in good faith respect that dynamic, as visitors alter their destinations and activities according to those trends.

Air tours are a vital option for many visitors providing a once-in-a-lifetime opportunity to experience natural and man-made landmarks. Visitors choosing aerial tourism represent the lowest impact to any park, recreation area, or memorial. Aerial tourism reduces impacts to parks, recreation areas and memorials. Aerial tourism provides the lowest form of impact in the park, leaving absolutely no trace, while reducing congestion and demand on park infrastructure in a significant way. For the NPS to ignore this fact is disingenuous at best.

By further restricting an already very limited number of allowable air tours, we are reducing the most environmentally responsible access to Mt. Rushmore, which is in opposition to the very goals stated by the NPS in the Public Scoping Documents. Through strict altitude and route requirements to mitigate noise just to name a few efforts air-tour operators are continually working to ensure they are responsible stewards of the environment.

Currently, there are no restrictions or mitigation efforts for other vehicles operating inside the boundaries of Mt. Rushmore. For example, throughout the summer months, heavy motorcycle traffic at the memorial produces far more impact than aerial tourism. A study was completed by the Town of Keystone, adjacent to the memorial that clearly shows this to be the case. Why are only air tours the only subject of the "Natural Quiet" scrutiny?

For individuals and groups with disabilities, aerial tourism provides the access promised in the mission of the NPS. The Memorial should be available for all visitors to enjoy. Limiting flights within the memorial boundary unfairly limits the elderly, very young, handicapped, and others who wish to experience the memorial. Limiting flights over the Memorial restricts access for those who might not have the time, resources, or physical ability to see the memorial any other way.

The NPS cannot independently drive the ATMP process behind closed doors. I strongly urge you to consult with the stakeholders, operators and NPOAG on the further development of the ATMPs to collaboratively address the concerns as an alternative to the current flawed approach.

Correspondence ID:	104	Project: 97377	Document:	123303
Name:	,			
Received:	Sep,21 2022 18:18:43			
Correspondence Type:	Web Form			

Correspondence: Alternative 2 is best. They can fly outside the line.

Correspondence ID:	105	Project: 97377	Document:	123303
Name:	Enoch-Kroger, Janice			
Received:	Sep,22 2022 19:39:16			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

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Aerial tourism at Mt. Rushmore dates back to the 1960s. The economic impact these plans will have on the existing air tour companies threatens to shut down businesses that have been operating safely and responsibly for the past 30 years. This impact has reverberating consequences for the local and state economy, both of which are required elements of consideration and have been ignored.

Aerial tourism provides significant workforce development opportunities that support other sectors of the vertical lift industry to include firefighting and emergency medical services. The elimination of this workforce pool would exacerbate current pilot shortages and have impacts well beyond the limited footprint of the Mt Rushmore National Memorial.

The proposed options suggest flight allocation numbers that do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change, and NPS should in good faith respect that dynamic, as visitors alter their destinations and activities according to those trends.

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while reducing congestion and demand on park infrastructure in a significant way. For the NPS to ignore this fact is disingenuous at best.

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The NPS cannot independently drive the ATMP process behind closed doors. I strongly urge you to consult with the stakeholders, operators and NPOAG on the further development of the ATMPs to collaboratively address the concerns as an alternative to the current flawed approach.

Please take into consideration the many people who want to stay off the crowded roads and view the beauty of the park by air.

Correspondence ID:	106	Project: 97377	Document:	123303
Name:	Meiris, Jessica			
Received:	Sep,23 2022 12:32:45			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

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The NPS cannot independently drive the ATMP process behind closed doors. I strongly urge you to consult with the stakeholders, operators and NPOAG on the further development of the ATMPs to collaboratively address the concerns as an alternative to the current flawed approach.

Correspondence ID:	107	Project: 97377	Document:	123303
Name:	Thorsrud, Derek			
Received:	Sep,23 2022 14:03:29			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

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Roll Tide.

Correspondence ID:	108	Project: 97377	Document:	123303
Name:	,			
Received:	Sep,24 2022 09:36:30			
Correspondence Type:	Web Form			

Correspondence: STOP GOV OVERREACH!!!

Correspondence ID:	109	Project: 97377	Document:	123303
Name:	,			
Received:	Sep,24 2022 09:45:24			
Correspondence Type:	Web Form			

Correspondence: If this happens to the Air Tour company in South Dakota, then Sturgis Rally should stop they are more noisy, and people drive drunk in motorcycles and fatal accidents do occur and kill innocent people driving sober. And I'm sure people would stop coming to South Dakota because the only cool thing here is the Helicopter tours and small companies would go out of business as well. Don't Eliminate Air Tours at Mt.Rushmore and Badlands

Correspondence ID:	110	Project: 97377	Document:	123303
Name:	Fogg, Ben			
Received:	Sep,24 2022 13:08:51			
Correspondence Type:	Web Form			

Correspondence: Dear committee ,

Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

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For individuals and groups with disabilities, aerial tourism provides the access promised in the mission of the NPS. The Memorial should be available for all visitors to enjoy. Limiting flights within the memorial boundary unfairly limits the elderly, very young, handicapped, and others who wish to experience the memorial. Limiting flights over the Memorial restricts access for those who might not have the time, resources, or physical ability to see the memorial any other way.

The NPS cannot independently drive the ATMP process behind closed doors. I strongly urge you to consult with the stakeholders, operators and NPOAG on the further development of the ATMPs to collaboratively address the concerns as an alternative to the current flawed approach.

Correspondence ID:	111	Project: 97377	Document:	123303
Name:	Scofield, Russell			
Received:	Sep,24 2022 21:55:27			
Correspondence Type:	Web Form			

Correspondence: I have visited Mount Rushmore multiple times and on each visit have been disturbed by air tours both on park lands and adjoining public lands administered by the Forest Service. This environmental assessment must contain a through analysis of air tours' green house gas emissions, any additional climate impacts, noise pollution effects on park resources particularly sensitive wildlife, and the sociological impacts of noise pollution upon park and adjoining Forest Service visitors.

An alternative with higher minimum above ground level (AGL) limits must be developed and analysis of noise impacts on wildlife and visitors from various AGLs must be included in the development of this new alternative. The current minimum AGL of 900 feet for helicopters feels predecisional and appears arbitrary and capricious. It also seems that by having all but one route have the minimum AGL of 900 feet in the two action alternatives that allow air tours seems to limit your range of alternatives.

I do want to thank you for a thoughtful and complete planning newsletter. Table 6 is particularly useful for alternative comparison.

Correspondence ID:	112	Project: 97377	Document:	123303
Name:	Abrams, Shawn			
Received:	Sep,26 2022 10:17:15			
Correspondence Type:	Web Form			

Correspondence: I have read and think the proposed changes in regulations are going to affect the aviation industry. I echo and agree with what is said below:

Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

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Correspondence ID:	113	Project: 97377	Document:	123303
Name:	Taylor, Emma			
Received:	Sep,27 2022 01:48:43			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

As a supporter of the rotor industry, I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

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Correspondence ID:	114	Project: 97377	Document:	123303
Name:	Yeager, Warren			
Received:	Sep,27 2022 03:11:17			
Correspondence Type:	Web Form			

Correspondence: Helicopter tours of National Parks are an important way to share them with the People.

I understand the need for balance between many elements, including safety, noise and environmental concerns, but changes in regulation which puts helicopter tours out of business, or to price their services out of the reach of average visitors is a disservice to the intent of Public lands.

Correspondence ID:	115	Project: 97377	Document:	123303
Name:	Howell, John			
Received:	Sep,27 2022 05:12:23			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

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Aerial tourism at Mt. Rushmore dates back to the 1960s. The economic impact these plans will have on the existing air tour companies threatens to shut down businesses that have been operating safely and responsibly for the past 30 years. This impact has reverberating consequences for the local and state economy, both of which are required elements of consideration and have been ignored.

Aerial tourism provides significant workforce development opportunities that support other sectors of the vertical lift industry to include firefighting and emergency medical services. The elimination of this workforce pool would exacerbate current pilot shortages and have impacts well beyond the limited footprint of the Mt Rushmore National Memorial.

The proposed options suggest flight allocation numbers that do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change, and NPS should in good faith respect that dynamic, as visitors alter their destinations and activities according to those trends.

Air tours are a vital option for many visitors providing a once-in-a-lifetime opportunity to experience natural and man-made landmarks. Visitors choosing aerial tourism represent the lowest impact to any park, recreation area, or memorial. Aerial tourism reduces impacts to parks, recreation areas and memorials. Aerial tourism provides the lowest form of impact in the park, leaving absolutely no trace, while reducing congestion and demand on park infrastructure in a significant way. For the NPS to ignore this fact is disingenuous at best.

By further restricting an already very limited number of allowable air tours, we are reducing the most environmentally responsible access to Mt. Rushmore, which is in opposition to the very goals stated by the NPS in the Public Scoping Documents. Through strict altitude and route requirements to mitigate noise just to name a few efforts air-tour operators are continually working to ensure they are responsible stewards of the environment.

Currently, there are no restrictions or mitigation efforts for other vehicles operating inside the boundaries of Mt. Rushmore. For example, throughout the summer months, heavy motorcycle traffic at the memorial produces far more impact than aerial tourism. A study was completed by the Town of Keystone, adjacent to the memorial that clearly shows this to be the case.

For individuals and groups with disabilities, aerial tourism provides the access promised in the mission of the NPS. The Memorial should be available for all visitors to enjoy. Limiting flights within the memorial boundary unfairly limits the elderly, very young, handicapped, and others who wish to experience the memorial. Limiting flights over the Memorial restricts access for those who might not have the time, resources, or physical ability to see the memorial any other way.

The NPS cannot independently drive the ATMP process behind closed doors. I strongly urge you to consult with the stakeholders, operators and NPOAG on the further development of the ATMPs to collaboratively address the concerns as an alternative to the current flawed approach. Thanks.

Correspondence ID:	116	Project: 97377	Document:	123303
Name:	Facory, Omar			
Received:	Sep,27 2022 09:34:47			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I have concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

NPOAG guidance is critical to the safety and economic stability of the air tour industry while balancing the needs of the environment, tribal interests, the NPS, and the FAA. Excluding NPOAG in the ATMP process is negligent and violates congressional intent.

The Public Scoping Documents serve to pre-shape public comment by offering options with no justification or data to support the offerings. This is a terribly flawed process, moving forward without critical NPOAG input, to produce an agency desired outcome.

Without the expertise and safety input from stakeholders, operators, and the NPOAG, serious safety concerns will arise as the NPS, with no expertise, moves, compresses, combines and shifts flight routes and altitudes that have been in place for years. The very routes in question were designed jointly between operators and the local Park Unit stakeholders.

Aerial tourism at Mt. Rushmore dates back to the 1960s. The economic impact these plans will have on the existing air tour companies threatens to shut down businesses that have been operating safely and responsibly for the past 30 years. This impact has reverberating consequences for the local and state economy, both of which are required elements of consideration and have been ignored.

Aerial tourism provides significant workforce development opportunities that support other sectors of the vertical lift industry to include firefighting and emergency medical services. The elimination of this workforce pool would exacerbate current pilot shortages and have impacts well beyond the limited footprint of the Mt Rushmore National Memorial.

The proposed options suggest flight allocation numbers that do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry

marketing trends change, and NPS should in good faith respect that dynamic, as visitors alter their destinations and activities according to those trends.

Air tours are a vital option for many visitors providing a once-in-a-lifetime opportunity to experience natural and man-made landmarks. Visitors choosing aerial tourism represent the lowest impact to any park, recreation area, or memorial. Aerial tourism reduces impacts to parks, recreation areas and memorials. Aerial tourism provides the lowest form of impact in the park, leaving absolutely no trace, while reducing congestion and demand on park infrastructure in a significant way. For the NPS to ignore this fact is disingenuous at best.

By further restricting an already very limited number of allowable air tours, we are reducing the most environmentally responsible access to Mt. Rushmore, which is in opposition to the very goals stated by the NPS in the Public Scoping Documents. Through strict altitude and route requirements to mitigate noise just to name a few efforts air-tour operators are continually working to ensure they are responsible stewards of the environment.

Currently, there are no restrictions or mitigation efforts for other vehicles operating inside the boundaries of Mt. Rushmore. For example, throughout the summer months, heavy motorcycle traffic at the memorial produces far more impact than aerial tourism. A study was completed by the Town of Keystone, adjacent to the memorial that clearly shows this to be the case.

For individuals and groups with disabilities, aerial tourism provides the access promised in the mission of the NPS. The Memorial should be available for all visitors to enjoy. Limiting flights within the memorial boundary unfairly limits the elderly, very young, handicapped, and others who wish to experience the memorial. Limiting flights over the Memorial restricts access for those who might not have the time, resources, or physical ability to see the memorial any other way.

The NPS cannot independently drive the ATMP process behind closed doors. I strongly urge you to consult with the stakeholders, operators and NPOAG on the further development of the ATMPs to collaboratively address the concerns as an alternative to the current flawed approach.

Correspondence ID:	117	Project: 97377	Document:	123303
Name:	Haines, Todd			
Received:	Sep,27 2022 10:33:41			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

Please allow tour operators to continue with their service as it provides views that are otherwise unseen.

Correspondence ID:	118	Project: 97377	Document:	123303
Name:	Wright, Ross M			
Received:	Sep,27 2022 13:32:42			
Correspondence Type:	Web Form			

Correspondence: I am writing to express my disappointment with the huge increase in helicopter traffic above the Black Hills in general and specifically above Mount Rushmore National Monument. My family has recreated year round in the Black Hills my entire life. I have witnessed firsthand, the fact that congestion has not only gotten worse on the ground, but in the skies as well. Aircraft can be seen flying lower and more erratically than ever before with little regard for safety of those on board or on the ground. This situation severely limits the ability of those on the ground to find any peace and quiet in their homes, their campsites, or in the woods not to mention the adverse impact this has on wildlife in

the area. I believe it is only a matter of time until there is an in flight collision between competing tour companies or aircraft from the same company. To my knowledge, only one tour operator uses ADSBs on his aircraft, while another tour operator refuses to do so. I have personally communicated with FAA staff and management about low flying aircraft on behalf of clients as part of my law practice. Many of these landowners homesteaded this area long before helicopters arrived. These folks have provided pictures and videos of aircraft repeatedly well below 500 ft directly above their homes, sometimes dozens of times a day. For these reasons, I ask that no flights be allowed to fly over Mt. Rushmore within the ATMP management area going forward as it severely detracts from the experience for visitors.

Correspondence ID:	119	Project: 97377	Document:	123303
Name:	Huling, Murray			
Received:	Sep,27 2022 13:34:25			
Correspondence Type:	Web Form			

Correspondence: Please find dissenting comments from the Aircraft Owners and Pilots Association (AOPA) regarding the U.S. National Park Service (NPS) and Federal Aviation Administration (FAA) proposed Air Tour Management Plan for Mount Rushmore National Memorial.

The Aircraft Owners and Pilots Association (AOPA) is the world's largest aviation membership association representing pilots, aircraft owners, and aviation enthusiasts. AOPA serves its membership through advocacy, promoting safety, fun, and maintaining the right to fly. AOPA respectfully submits this comment on behalf of its more than 300,000 members in response to the proposed Air Tour Management Plan (ATMP) for Mt. Rushmore National Memorial.

We have serious concerns with the proposal and the ATMP development process of the Air Tour Management Plan for Mt. Rushmore National Memorial. Both NPS and the FAA have ignored stakeholders, operators, and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000. With an AOPA member on the NPOAG, we have witnessed firsthand the lack of NPOAG involvement and are very disappointed with NPS and FAA for the lack of commitment to adhere to the original congressional intent of the NPOAG when established. The elimination of NPOAG's involvement in developing proposed ATMPs is also a safety concern due to the proposals being produced without NPOAG industry expert involvement. Please note that an NPS and FAA briefing provided to the NPOAG after the fact of what NPS/FAA has developed in a government silo does not meet the congressional intent of NPOAG involvement.

NPOAG's involvement and recommendations are critical to the safety and economic stability of the air tour industry while balancing the needs of the environment, tribal interests, the NPS, and the FAA. Excluding NPOAG in the ATMP process is negligent, violates congressional intent, and above all else, increases risks to life and property due to the lack of safety consideration in those ATMPs developed without industry safety expertise of the NPOAG during development.

The Public Scoping Documents serve to pre-shape public comment and opinion by offering options with no justification or support data to substantiate those options. Moving forward without critical NPOAG input to produce the agency's desired outcome is not sustainable. AOPA calls for the NPS and FAA to immediately change course and return to a model of NPOAG involvement in developing all proposals as originally intended by congress. All ATMPs developed without NPOAG involvement in their development should be reopened for NPOAG industry expertise involvement in the pursuit of an amenable resolution.

Without the expertise and safety input from stakeholders, operators, and the NPOAG, serious safety concerns will arise as the NPS, with limited to no expertise, moves, compresses, combines, and shifts flight routes and altitudes that have been in place for years. The very routes in question were designed jointly between operators and the local Park Unit stakeholders.

Aerial tourism at Mt. Rushmore dates back to the 1960s. The economic impact these plans will have on the existing air tour companies threatens to shut down businesses that have been operating safely and responsibly for the past 30 years. This impact has reverberating consequences for the local and state economy, both of which are required elements of consideration and have been ignored.

Air tours are a vital option for many visitors providing a once-in-a-lifetime opportunity to experience natural and man-made landmarks. Visitors choosing aerial tourism represent the lowest impact on any park, recreation area, or memorial. Aerial tourism reduces impacts on parks, recreation areas, and memorials. Aerial tourism leaves no trace while reducing congestion and demand on park surface infrastructure. For the NPS to ignore this fact is disingenuous at best.

For individuals and groups with disabilities, aerial tourism provides the access promised in the mission of the NPS. The Memorial should be available for all visitors to enjoy. Limiting flights within the memorial boundary discriminates against the elderly, very young, handicapped, and others who wish to experience the memorial. Limiting flights over the Memorial restricts access for those who might not have the time, resources, or physical ability to see the memorial any other way.

The NPS and FAA cannot continue to force the ATMP process behind closed doors. AOPA urges the government to utilize the NPOAG as originally intended by congress to ensure public safety and access to our national parks without discrimination. Reducing and eliminating opportunities for many who must fly to enjoy Mt. Rushmore and all other national parks is discriminatory. In addition, with NPS publicly stating their goal is to stop all tour overflights eventually, they are not considering or caring about the severe economic impact on the tour companies, their employees, and the local communities.

AOPA requests that NPS and FAA hold off on finalizing the current Mt. Rushmore National Memorial ATMP until the NPOAG is allowed to complete its congressionally directed role. The current direction NPS and FAA is taking with ATMPs is government overreach and must be corrected. As the West Virginia v. EPA case demonstrates, bypassing what is a congressional responsibility, the congressional mandate for including the NPOAG in ATMP development, any other option than following congressional decisions is not acceptable.

Correspondence ID:	120	Project: 97377	Document:	123303
Name:	,			
Received:	Sep,27 2022 17:51:26			
Correspondence Type:	Web Form			

Correspondence: Alternative 2 is the best. Air tours can continue farther out from the monument. Protecting visitor experience at Mt. Rushmore should be a priority and helicopters flying nearby detract from that experience.

Correspondence ID:	121	Project: 97377	Document:	123303
Name:	Olson, Jodi			
Received:	Sep,28 2022 06:37:47			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I have worked with Black Hills Aerial Adventures in the past. Every single individual that has flown in any of the helicopters, have found the experience to be the most beautiful way to see and experience the Black Hills. It even has helped disabled people heal from the trauma of flight and fear of heights to become a wonderful memory. This business impacts the community and all its tourism!

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

NPOAG guidance is critical to the safety and economic stability of the air tour industry while balancing the needs of the environment, tribal interests, the NPS, and the FAA. Excluding NPOAG in the ATMP process is negligent and violates congressional intent.

The Public Scoping Documents serve to pre-shape public comment by offering options with no justification or data to support the offerings. This is a terribly flawed process, moving forward without critical NPOAG input, to produce an agency desired outcome.

Without the expertise and safety input from stakeholders, operators, and the NPOAG, serious safety concerns will arise as the NPS, with no expertise, moves, compresses, combines and shifts flight routes and altitudes that have been in place for years. The very routes in question were designed jointly between operators and the local Park Unit stakeholders.

Aerial tourism at Mt. Rushmore dates back to the 1960s. The economic impact these plans will have on the existing air tour companies threatens to shut down businesses that have been operating safely and responsibly for the past 30 years. This impact has reverberating consequences for the local and state economy, both of which are required elements of consideration and have been ignored.

Aerial tourism provides significant workforce development opportunities that support other sectors of the vertical lift industry to include firefighting and emergency medical services. The elimination of this workforce pool would exacerbate current pilot shortages and have impacts well beyond the limited footprint of the Mt Rushmore National Memorial.

The proposed options suggest flight allocation numbers that do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change, and NPS should in good faith respect that dynamic, as visitors alter their destinations and activities according to those trends.

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By further restricting an already very limited number of allowable air tours, we are reducing the most environmentally responsible access to Mt. Rushmore, which is in opposition to the very goals stated by the NPS in the Public Scoping Documents. Through strict altitude and route requirements to mitigate noise just to name a few efforts air-tour operators are continually working to ensure they are responsible stewards of the environment.

Currently, there are no restrictions or mitigation efforts for other vehicles operating inside the boundaries of Mt. Rushmore. For example, throughout the summer months, heavy motorcycle traffic at

the memorial produces far more impact than aerial tourism. A study was completed by the Town of Keystone, adjacent to the memorial that clearly shows this to be the case.

For individuals and groups with disabilities, aerial tourism provides the access promised in the mission of the NPS. The Memorial should be available for all visitors to enjoy. Limiting flights within the memorial boundary unfairly limits the elderly, very young, handicapped, and others who wish to experience the memorial. Limiting flights over the Memorial restricts access for those who might not have the time, resources, or physical ability to see the memorial any other way.

The NPS cannot independently drive the ATMP process behind closed doors. I strongly urge you to consult with the stakeholders, operators and NPOAG on the further development of the ATMPs to collaboratively address the concerns as an alternative to the current flawed approach.

Correspondence ID:	122	Project: 97377	Document:	123303
Name:	Harwell, Jason			
Received:	Sep,28 2022 21:42:43			
Correspondence Type:	Web Form			

Correspondence: To whom it may concern:

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

NPOAG guidance is critical to the safety and economic stability of the air tour industry while balancing the needs of the environment, tribal interests, the NPS, and the FAA. Excluding NPOAG in the ATMP process is negligent and violates congressional intent.

The Public Scoping Documents serve to pre-shape public comment by offering options with no justification or data to support the offerings. This is a terribly flawed process, moving forward without critical NPOAG input, to produce an agency desired outcome.

Without the expertise and safety input from stakeholders, operators, and the NPOAG, serious safety concerns will arise as the NPS, with no expertise, moves, compresses, combines and shifts flight routes and altitudes that have been in place for years. The very routes in question were designed jointly between operators and the local Park Unit stakeholders.

Aerial tourism at Mt. Rushmore dates back to the 1960s. The economic impact these plans will have on the existing air tour companies threatens to shut down businesses that have been operating safely and responsibly for the past 30 years. This impact has reverberating consequences for the local and state economy, both of which are required elements of consideration and have been ignored.

Aerial tourism provides significant workforce development opportunities that support other sectors of the vertical lift industry to include firefighting and emergency medical services. The elimination of this workforce pool would exacerbate current pilot shortages and have impacts well beyond the limited footprint of the Mt Rushmore National Memorial.

The proposed options suggest flight allocation numbers that do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change, and NPS should in good faith respect that dynamic, as visitors alter their destinations and activities according to those trends.

Air tours are a vital option for many visitors providing a once-in-a-lifetime opportunity to experience natural and man-made landmarks. Visitors choosing aerial tourism represent the lowest impact to any park, recreation area, or memorial. Aerial tourism reduces impacts to parks, recreation areas and memorials. Aerial tourism provides the lowest form of impact in the park, leaving absolutely no trace, while reducing congestion and demand on park infrastructure in a significant way. For the NPS to ignore this fact is disingenuous at best.

By further restricting an already very limited number of allowable air tours, we are reducing the most environmentally responsible access to Mt. Rushmore, which is in opposition to the very goals stated by the NPS in the Public Scoping Documents. Through strict altitude and route requirements to mitigate noise just to name a few efforts air-tour operators are continually working to ensure they are responsible stewards of the environment.

Currently, there are no restrictions or mitigation efforts for other vehicles operating inside the boundaries of Mt. Rushmore. For example, throughout the summer months, heavy motorcycle traffic at the memorial produces far more impact than aerial tourism. A study was completed by the Town of Keystone, adjacent to the memorial that clearly shows this to be the case.

For individuals and groups with disabilities, aerial tourism provides the access promised in the mission of the NPS. The Memorial should be available for all visitors to enjoy. Limiting flights within the memorial boundary unfairly limits the elderly, very young, handicapped, and others who wish to experience the memorial. Limiting flights over the Memorial restricts access for those who might not have the time, resources, or physical ability to see the memorial any other way.

The NPS cannot independently drive the ATMP process behind closed doors. I strongly urge you to consult with the stakeholders, operators and NPOAG on the further development of the ATMPs to collaboratively address the concerns as an alternative to the current flawed approach.

Correspondence ID:	123	Project: 97377	Document:	123303
Name:	Anderson, Jon			
Received:	Sep,28 2022 22:14:34			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

NPOAG guidance is critical to the safety and economic stability of the air tour industry while balancing the needs of the environment, tribal interests, the NPS, and the FAA. Excluding NPOAG in the ATMP process is negligent and violates congressional intent.

The Public Scoping Documents serve to pre-shape public comment by offering options with no justification or data to support the offerings. This is a terribly flawed process, moving forward without critical NPOAG input, to produce an agency desired outcome.

Without the expertise and safety input from stakeholders, operators, and the NPOAG, serious safety concerns will arise as the NPS, with no expertise, moves, compresses, combines and shifts flight routes and altitudes that have been in place for years. The very routes in question were designed jointly between operators and the local Park Unit stakeholders.

Aerial tourism at Mt. Rushmore dates back to the 1960s. The economic impact these plans will have on the existing air tour companies threatens to shut down businesses that have been operating safely and responsibly for the past 30 years. This impact has reverberating consequences for the local and state economy, both of which are required elements of consideration and have been ignored.

Aerial tourism provides significant workforce development opportunities that support other sectors of the vertical lift industry to include firefighting and emergency medical services. The elimination of this workforce pool would exacerbate current pilot shortages and have impacts well beyond the limited footprint of the Mt Rushmore National Memorial.

The proposed options suggest flight allocation numbers that do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change, and NPS should in good faith respect that dynamic, as visitors alter their destinations and activities according to those trends.

Air tours are a vital option for many visitors providing a once-in-a-lifetime opportunity to experience natural and man-made landmarks. Visitors choosing aerial tourism represent the lowest impact to any park, recreation area, or memorial. Aerial tourism reduces impacts to parks, recreation areas and memorials. Aerial tourism provides the lowest form of impact in the park, leaving absolutely no trace, while reducing congestion and demand on park infrastructure in a significant way. For the NPS to ignore this fact is disingenuous at best.

By further restricting an already very limited number of allowable air tours, we are reducing the most environmentally responsible access to Mt. Rushmore, which is in opposition to the very goals stated by the NPS in the Public Scoping Documents. Through strict altitude and route requirements to mitigate noise just to name a few efforts air-tour operators are continually working to ensure they are responsible stewards of the environment.

Currently, there are no restrictions or mitigation efforts for other vehicles operating inside the boundaries of Mt. Rushmore. For example, throughout the summer months, heavy motorcycle traffic at the memorial produces far more impact than aerial tourism. A study was completed by the Town of Keystone, adjacent to the memorial that clearly shows this to be the case.

For individuals and groups with disabilities, aerial tourism provides the access promised in the mission of the NPS. The Memorial should be available for all visitors to enjoy. Limiting flights within the memorial boundary unfairly limits the elderly, very young, handicapped, and others who wish to experience the memorial. Limiting flights over the Memorial restricts access for those who might not have the time, resources, or physical ability to see the memorial any other way.

The NPS cannot independently drive the ATMP process behind closed doors. I strongly urge you to consult with the stakeholders, operators and NPOAG on the further development of the ATMPs to collaboratively address the concerns as an alternative to the current flawed approach.

Correspondence ID:	124	Project: 97377	Document:	123303
Name:	Tucker, Tim			
Received:	Sep,29 2022 01:13:00			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and

recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

NPOAG guidance is critical to the safety and economic stability of the air tour industry while balancing the needs of the environment, tribal interests, the NPS, and the FAA. Excluding NPOAG in the ATMP process is negligent and violates congressional intent.

The Public Scoping Documents serve to pre-shape public comment by offering options with no justification or data to support the offerings. This is a terribly flawed process, moving forward without critical NPOAG input, to produce an agency desired outcome.

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The NPS cannot independently drive the ATMP process behind closed doors. I strongly urge you to consult with the stakeholders, operators and NPOAG on the further development of the ATMPs to collaboratively address the concerns as an alternative to the current flawed approach.

Thank you

Correspondence ID:	125	Project: 97377	Document:	123303
Name:	Young, Christopher			
Received:	Sep,29 2022 13:41:27			
Correspondence Type:	Web Form			

Correspondence: To whom it may concern,

Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

NPOAG guidance is critical to the safety and economic stability of the air tour industry while balancing the needs of the environment, tribal interests, the NPS, and the FAA. Excluding NPOAG in the ATMP process is negligent and violates congressional intent.

The Public Scoping Documents serve to pre-shape public comment by offering options with no justification or data to support the offerings. This is a terribly flawed process, moving forward without critical NPOAG input, to produce an agency desired outcome.

Without the expertise and safety input from stakeholders, operators, and the NPOAG, serious safety concerns will arise as the NPS, with no expertise, moves, compresses, combines and shifts flight routes and altitudes that have been in place for years. The very routes in question were designed jointly between operators and the local Park Unit stakeholders.

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The proposed options suggest flight allocation numbers that do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change, and NPS should in good faith respect that dynamic, as visitors alter their destinations and activities according to those trends.

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persons with disabilities see these sites that they might not otherwise physically be capable of. For the NPS to ignore this fact is disingenuous at best.

By further restricting an already very limited number of allowable air tours, we are reducing the most environmentally responsible access to Mt. Rushmore, which is in opposition to the very goals stated by the NPS in the Public Scoping Documents. Through strict altitude and route requirements to mitigate noise just to name a few efforts air-tour operators are continually working to ensure they are responsible stewards of the environment.

Currently, there are no restrictions or mitigation efforts for other vehicles operating inside the boundaries of Mt. Rushmore. For example, throughout the summer months, heavy motorcycle traffic at the memorial produces far more impact than aerial tourism. A study was completed by the Town of Keystone, adjacent to the memorial that clearly shows this to be the case.

For individuals and groups with disabilities, aerial tourism provides the access promised in the mission of the NPS. The Memorial should be available for all visitors to enjoy. Limiting flights within the memorial boundary unfairly limits the elderly, very young, handicapped, and others who wish to experience the memorial. Limiting flights over the Memorial restricts access for those who might not have the time, resources, or physical ability to see the memorial any other way.

The NPS cannot independently drive the ATMP process behind closed doors. I strongly urge you to consult with the stakeholders, operators and NPOAG on the further development of the ATMPs to collaboratively address the concerns as an alternative to the current flawed approach.

Correspondence ID:	126	Project: 97377	Document:	123303
Name:	,			
Received:	Sep,30 2022 18:37:42			
Correspondence Type:	Web Form			

Correspondence: I personally believe that there needs to be a ban on all aircraft activity above and around the monument and park. The sight of an aircraft can take way from the view of the monument and the natural beauty surrounding it. Also, the sounds these aircrafts make are annoying and take away from the experience.

Correspondence ID:	127	Project: 97377	Document:	123303
Name:	Owens, Ken			
Received:	Oct,02 2022 13:27:59			
Correspondence Type:	Web Form			

Correspondence: I worked as a volunteer at Mount Rushmore in the summer of 1992. I remember the noise that the helicopter tours produced at the Visitor Center and the main visitor area in general. It was always noticeable and often interrupted the guided tours, and interfered with the narration of the rangers. While I appreciate the views that an aerial tour provides, the small number of visitors for whom these tours are available have a noticeable and undesired impact on the far greater number of visitors who visit the Memorial in person.

It is my opinion that these tours be disallowed and Alternative 2 be adopted.

In the event that tours are allowed to continue, the number of flights should be reduced and Alternative 4 be adopted, with the provision that the distance of closest approach be increased so that the noise impact be reduced further as measured by noise levels from the parking structure - the farthest point from the mountain which still supports significant pedestrian traffic.

Thank you for your attention and for the opportunity to comment.

Correspondence ID:	128	Project: 97377	Document:	123303
Name:	,			
Received:	Oct,02 2022 19:12:11			
Correspondence Type:	Web Form			

Correspondence: Yes to limiting air tours to outside a 1/2 mile of the site

Yes to limiting the # of air tours per day to minimize sound disturbances

Correspondence ID:	129	Project: 97377	Document:	123303
Name:	Brown, Lisa			
Received:	Oct,03 2022 04:42:44			
Correspondence Type:	Web Form			

Correspondence: Thank you for following procedure and allowing for public comment. As homeowners, residents of the Black Hills, residing east of Custer, SD, we experience the intrusion of the noise of the helicopter tourist traffic on a daily basis end of April through October. Experiencing the spirit of the Black Hills includes the experiencing the quiet one can experience here. Places of quiet are a rare commodity. As a physician, I am keenly aware of humans needing quiet spaces to feel safe, rest, restore oneself. Humans visiting the Black Hills are in need of quiet. Offering protection for this quiet to allow for a best possible experience at Mt. Rushmore would be the right thing to do. I would recommend Option 2, the highest level of restriction

Correspondence ID:	130	Project: 97377	Document:	123303
Name:	,Jennifer			
Received:	Oct,03 2022 06:55:17			
Correspondence Type:	Web Form			

Correspondence: When I had the pleasure to visit Mount Rushmore I was taken aback by it's beauty, phenomenal artwork and amazing craftsmanship. I also experienced a quiet peacefulness. After reading about the proposed air traffic in the area I found it important to write the following:

I hope this does NOT pass and everyone who comes to visit can experience Mount Rushmore in quiet peacefulness.

Correspondence ID:	131	Project: 97377	Document:	123303
Name:	Murray, Michael			
Received:	Oct,03 2022 13:28:45			
Correspondence Type:	Web Form			

Correspondence: October 3, 2022

Ms. Michelle Wheatley, Superintendent

Mount Rushmore National Memorial

13000 Highway 244

Building 31, Suite 1

Keystone, SD 57751

Subject: Potential Air Tour Management Plan (ATMP) Alternatives for Mount Rushmore National Memorial

Dear Superintendent Wheatley:

I am writing on behalf of over 2,200 members of the Coalition to Protect America's National Parks (Coalition), who collectively represent more than 45,000 years of national park management experience. The Coalition studies, educates, speaks, and acts for the preservation of America's National Park System. Among our members are former National Park Service (NPS) directors, regional directors, superintendents, resource specialists, rangers, maintenance and administrative staff, and a full array of other former employees, volunteers, and supporters.

We offer the following comments for your consideration regarding Potential Alternatives for the Air Tour Management Plan (ATMP) for Mount Rushmore National Memorial (MORU), as described in the Newsletter at:

<https://parkplanning.nps.gov/document.cfm?parkID=152&projectID=97377&documentID=123303>

GENERAL COMMENTS

1. First, we appreciate that MORU plans to prepare an environmental assessment (EA) in accordance with Council of Environmental Quality (CEQ) National Environmental Policy Act (NEPA) implementing regulations at 40 CFR Parts 1500 - 1508 and the NPS NEPA Handbook 2015 - We have been deeply concerned about the many proposed ATMPs for other parks that NPS issued previously without considering a reasonable range of alternatives and without preparing any sort of NEPA compliance for public review. We applaud you and the planning team for following the applicable process requirements that this proposal deserves.

However, the fact that you are preparing an EA while most parks have not begs the question - why did NPS not prepare an EA for many of the other parks that have already issued "proposed ATMPs"? As a practical matter, all 24 proposed ATMPs are being prepared under the same court order; but NPS is preparing an EA in only a very limited number of cases. We therefore ask NPS to explain in the forthcoming EA its basis for deciding to prepare an EA for MORU while not doing so for many other parks where the NPS and the FAA have also been ordered to prepare ATMPs.

2. The planning newsletter makes no mention of the NPS Organic Act (54 USC §100101) and offers no explanation as to the Act's relevance to the proposed action - While the National Parks Air Tour Management Act of 2000 requires the FAA and NPS to prepare ATMPs for parks where a certain level of commercial air tours have occurred, the NPS Organic Act requires NPS to protect park resources and values, which is, or at least should be, the core purpose of an ATMP. As with all NPS management plans, the NPS "conservation mandate" should drive the ATMP planning process and serve as the basis for evaluating the adequacy of proposed restrictions and related protective measures intended to minimize adverse impacts of air tours over parks.

Regarding the Organic Act, NPS Management Policies 2006 Section 1.4.1 states: "The most important statutory directive for the National Park Service is provided by interrelated provisions of the NPS Organic Act of 1916 and the NPS General Authorities Act of 1970, including amendments to the latter law enacted in 1978." As further stated in Management Policies Section 1.4.3:

The fundamental purpose of the national park system, established by the Organic Act and reaffirmed by the General Authorities Act, as amended, begins with a mandate to conserve park resources and values. This mandate is independent of the separate prohibition on impairment and applies all the time with respect to all park resources and values, even when there is no risk that any park resources or values may be impaired... Congress, recognizing that the enjoyment by future generations of the national parks can be ensured only if the superb quality of park resources and values is left unimpaired, has provided that when there is a conflict between conserving resources and values and providing for enjoyment of them, conservation is to be predominant. This is how courts have consistently interpreted the Organic Act. (Emphasis added)

Given that this EA is or should be focused on evaluating potential impacts of commercial air tours on natural and cultural resources and visitor experience opportunities within a unit of the National Park System, we would expect the NPS conservation mandate to serve as a key basis for the agencies to evaluate impacts to national park resources and values and determine an appropriate level of air tours. To be clear, Chapter 1 of the EA should include a section summarizing applicable laws, including the NPS Organic Act, relevant to the proposed action.

3. As described in MORU's 2015 Foundation Document, the visitor experience at MORU is closely associated with the "natural setting" of the Sculpture. As a result, NPS should make it a high priority to protect the natural setting at established viewing areas from visual and noise intrusions caused by low flying air tour aircraft - See: <http://npshistory.com/publications/foundation-documents/moru-fd-2015.pdf>.

Relevant sections of the Foundation Document include the following:

(p. 6) Fundamental Resources and Values: "Fundamental resources and values help focus planning and management efforts on what is truly significant about the park. One of the most important responsibilities of NPS managers is to ensure the conservation and public enjoyment of those qualities that are essential (fundamental) to achieving the purpose of the park and maintaining its significance. (Emphasis added) If fundamental resources and values are allowed to deteriorate, the park purpose and/or significance could be jeopardized. The following fundamental resources and values have been identified for Mount Rushmore National Memorial:

The Natural Setting. The Black Hills of South Dakota provide a dramatic natural setting for the sculpture at Mount Rushmore National Memorial. The pine forest, landscaping, natural soundscape, and night sky that comprise this setting are important not only for their aesthetic appeal, but also represent a place of great spiritual and cultural significance to the American Indian tribes who have connections to the land." (Emphasis added)

Views of the Sculpture. The views of the sculpture are critical to the experience at Mount Rushmore National Memorial. A variety of viewing opportunities are provided throughout the site, including the unimpeded views at Grand View Terrace, historic views from the sculptor's studio, and modern views from the Avenue of Flags and points along the highway. Visitors can gain an appreciation of the scale and setting of the sculpture as they move between these viewing opportunities. (Emphasis added)

(p. 16) Threats to the Natural Setting - "Noise from helicopters has impacted visitor experience and wildlife within the park."

(p. 17) Existing Data - "Soundscape study." Comment: We know that soundscape data exists for many parks where commercial air tours have been occurring; yet NPS has not provided any such information in any of the other ATMP planning documents to date. We therefore ask that NPS include detailed information from its MORU soundscape study in the upcoming EA. For example, to the extent that the study is relatively recent, it could/should serve as the baseline description of noise levels resulting from the current numbers of air tours that have been occurring, essentially unregulated except for an upper limit on the number of flights, under an Interim Operating Authority (IOA).

The numbers of visitors potentially impacted by air tours should also be considered in the EA. MORU typically receives over 2 million visitors per year; and, as previously described, the quality of their experience is closely associated with the quality of the park's "natural setting." MORU is relatively unique among units of the National Park System in that virtually 100% of its visitors are there to see one thing - the iconic Sculpture in its natural setting. The vast majority of those visitors will experience the Sculpture from the unimpeded views at Grand View Terrace, historic views from the sculptor's studio, and modern views from the Avenue of Flags.

We urge NPS to make it a high priority to protect this highly treasured visitor experience from visual intrusions and noise impacts caused by air tours flying above or near the established viewing areas. Protective measures (or “Alternative Attributes” as NPS calls them) should include constraints that eliminate visible overflights that could be easily seen by visitors from the viewing areas; and additional measures designed to minimize the intrusion of aircraft noise into the viewing areas. We will recommend modification of some of the proposed Attributes later in this letter.

4. Consistent with Management Policies Section 1.5, the EA should include an “appropriate use analysis” for the proposed action - The National Parks Air Tour Management Act of 2000 (49 USC 40128) established procedural requirements for allowing air tours over parks; however, the Act does NOT mandate that commercial air tours are appropriate and must be allowed. In fact, section (b)(3)(A) of the Act provides that the agencies “may prohibit commercial air tour operations over a national park in whole or in part.” Under the Act, air tours are essentially a discretionary activity subject to agency approval. To our knowledge, NPS has never formally considered or determined whether commercial air tours are an appropriate use of (or over) MORU. We therefore request that the EA include an appropriate use analysis as described in Management Policies Section 1.5.

5. The EA should include an “impairment determination” for the proposed action, as described in Management Policies Section 1.4.7, which states, in part - “Before approving a proposed action that could lead to an impairment of park resources and values, an NPS decision-maker must consider the impacts of the proposed action and determine, in writing, that the activity will not lead to an impairment of park resources and values. If there would be an impairment, the action must not be approved.” (Emphasis added)

Furthermore, “[t]he impact threshold at which impairment occurs is not always readily apparent. Therefore, the Service will apply a standard that offers greater assurance that impairment will not occur. The Service will do this by avoiding impacts that it determines to be unacceptable. These are impacts that fall short of impairment, but are still not acceptable within a particular park's environment.” See Management Policies 1.4.7.1. (Emphasis added)

6. The EA should identify its preparers as well as the respective roles of the NPS and the FAA/USDOT in the NEPA process - The newsletter solicits public comments that may be submitted electronically to the NPS via the park's PEPC website; or in writing (i.e., hard copy) to the U.S. Department of Transportation (USDOT) at the Volpe Center. As a result, it is confusing which agency is actually coordinating preparation of the EA and serves as the “lead agency” as described in 40 CFR §1501.7; and which agency serves as the “cooperating agency” as described in 40 CFR §1501.8.

This is a concern primarily if NPS plays a passive “reviewer only” role as a cooperating agency during the preparation of the pending EA, as NPS often does when it functions as a cooperating agency. In contrast, the CEQ NEPA implementing regulations provide for a cooperating agency to play a much more active role in the planning process and we strongly encourage NPS to do so in this case. For example, 40 CFR 1501.8(b)(3) provides that each cooperating agency “shall... [o]n request of the lead agency, assume responsibility for developing information and preparing environmental analyses, including portions of the environmental impact statement or environmental assessment concerning which the cooperating agency has special expertise.” (Emphasis added)

The NPS Natural Sounds Program clearly has special expertise with regard to measuring and assessing the impacts of air tour noise on park resources and values, including impacts to wildlife, wilderness, and visitor experience. As a result, we would expect the NPS, not the FAA or the Volpe Center, to prepare the analyses of such impacts. Since the primary purpose of the EA is to assess potential impacts of air tours on park resources and values at MORU, it is imperative that experienced NPS subject matter experts and NEPA practitioners, who regularly evaluate potential resource impacts through the lens of

the NPS conservation mandate, are active participants in preparing the various impact analyses for this proposal.

SECTION-BY-SECTION COMMENTS ABOUT THE NEWSLETTER

1. Resources for Consideration in the EA (p. 4) - The proposed list of impact topics appears complete to us. We especially appreciate that NPS has distinguished between and will separately analyze impacts to: Noise and compatible land use (acoustic environment and Park soundscape); Visitor experience; Visual effects (visual resources and visual character); and Wilderness. The impact analysis for each topic should include a discussion of available data, such as previous sound surveys, as well as a review of relevant scientific literature related to the impacts of aircraft noise on specific resources. When analyzing impacts to the Visitor Experience in the EA, we encourage NPS to describe the close connection between the quality of the natural setting and the quality of the visitor experience. In essence, protecting the visitor experience at MORU requires minimizing air tour impacts at the primary viewing areas for the Sculpture.

2. Thus far, no NPS-proposed ATMP has identified any applicable reference materials or data that were considered by NPS during the preparation of the proposed action. We therefore ask NPS to actively consider the following information, as well as other references identified in other sections of our comments, during the preparation of the EA for MORA:

- Effects of Aircraft Overflights on the National Park System. Report to Congress 1995:
<https://www.nonoise.org/library/npreport/intro.htm>

- An assessment of noise audibility and sound levels in U.S. National Parks:
<https://sites.warnercnr.colostate.edu/soundandlightecologyteam/wp-content/uploads/sites/146/2020/11/landscapeecology2011b.pdf>

- Protecting National Park Soundscapes: National Academy of Engineering 2013:
<https://www.nap.edu/catalog/18336/protecting-national-park-soundscapes>

- Effects of Noise on Wildlife: https://www.nps.gov/subjects/sound/effects_wildlife.htm

- A Synthesis of Two Decades of Research on the Effects of Noise on Wildlife:
<https://sites.warnercnr.colostate.edu/soundandlightecologyteam/wp-content/uploads/sites/146/2020/11/biologicalreviews2015.pdf>

- Conserving the wild life there in - protecting park fauna from anthropogenic noise:
<https://sites.warnercnr.colostate.edu/soundandlightecologyteam/wp-content/uploads/sites/146/2020/11/parkscience2009.pdf>

- A review of the effects of aircraft noise on wildlife and humans 2003:
https://www.researchgate.net/publication/8683287_A_Review_of_the_Effects_of_Aircraft_Noise_on_Wildlife_and_Humans_Current_Control_Mechanisms_and_the_Need_for_Further_Study

- Effects of Noise on Wilderness: https://www.nps.gov/subjects/sound/effects_wilderness.htm

- Noise pollution is pervasive in U.S. protected areas:
<https://www.science.org/doi/10.1126/science.aah4783>

- Effects of Noise on Visitors: https://www.nps.gov/subjects/sound/effects_visitors.htm

- Effects of Noise on Cultural-Historic Resources:
https://www.nps.gov/subjects/sound/effects_cultural.htm

- MORU Baseline Ambient Sound Levels 2003: <https://irma.nps.gov/DataStore/DownloadFile/554859>

In general, all of the reference materials listed above are available via links found on the NPS Natural Sounds Program website at: <https://www.nps.gov/subjects/sound/index.htm>. Since NPS has NOT

referred to any of this information in ANY of the previous proposed ATMPs issued to date, we ask NPS to include it now in the upcoming MORU EA.

In addition, the MORU Baseline Ambient Sound Levels report cited above is obviously quite dated. NPS should consider doing a new survey to more accurately document the noise impacts of the current level of air tours. Ideally NPS would produce an ATMP that results in a measurable reduction in noise impacts in the affected park. However, if NPS does not have reasonably accurate and current baseline data, then measuring the effectiveness of the plan at reducing ambient sound levels will be not be possible.

4. Alternatives Considered but Dismissed (pp. 6-7) - This section indicates that “[t]he agencies considered but dismissed alternatives that would allow air tour operations at or above existing numbers... because the NPS determined they would result in unacceptable impacts to the Park's natural and cultural resources, and visitor enjoyment.” Table 1 (p. 9) identifies the “existing” (or recent annual average) number of flights to be 3,914 from 2017-2019. We agree with the NPS determination and will refer to this information in our comments about Alternative 3 below.

5. Alternative 1 - No Action/No ATMP (pp. 8-10) - As described in the “Objective” section for this alternative, “[t]he no action alternative provides a basis for comparison but is not a selectable alternative because it does not meet the purpose and need for the ATMP and is not in compliance with the Act.” (Emphasis added) We agree that Alternative 1 is not selectable for the reasons stated.

However, NPS describes Alternative 1 as allowing the maximum theoretical number of flights (5,608) that could occur under Interim Operating Authorities (IOAs), rather than as the “existing number” of flights (i.e., 3,914 from 2017-2019) identified in Table 1. We have several concerns about NPS's choice to describe the No Action Alternative as the maximum theoretical number of air tour flights allowable under the IOAs, rather than the much more realistic “existing numbers of flights with current operating parameters” (which the agencies also considered but dismissed). See Comment # 4 above.

While we would expect NPS to have documentation and data regarding impacts of the existing numbers of flights, we question whether the maximum theoretical number of flights (5,608) can serve as a valid “basis for comparison” with the proposed action alternatives. As described in the NPS NEPA Handbook 2015, p. 56:

It is important to note that the no-action alternative is different than the baseline used for predicting changes to the condition of resources. The current state of the resources affected (typically what is described in the affected environment section of a NEPA document) serves as the baseline for predicting changes to the human environment that could occur if any of the alternatives under consideration, including the no-action alternative, are implemented. The current state of the resources affected (typically what is described in the affected environment section of a NEPA document) serves as the baseline for predicting changes to the human environment that could occur if any of the alternatives under consideration, including the no-action alternative, are implemented. (Emphasis added)

For the basis of comparison with the action alternatives, we recommend that NPS consider the “existing number” of flights (3,914) as the baseline in the No Action Alternative, rather than the theoretical maximum (5,608) allowed under the IOAs. First, the agencies have already determined that the “existing number” of flights is not selectable “because the NPS determined they would result in unacceptable impacts to the Park's natural and cultural resources, and visitor enjoyment.” Whereas that determination already establishes a practical baseline for what would be “unacceptable,” using the maximum theoretical number of flights as the baseline for comparison would only obscure the threshold between “unacceptable” and “acceptable” levels of impacts.

In addition, NPS likely has information and data regarding actual impacts of the existing numbers of flights that would allow for a meaningful analysis and comparison of the baseline with the action alternatives. In contrast, there is likely no such information on hand to document the potential impacts of a much higher theoretical number of flights that could occur under the IOAs (but has not). Using non-existent information as the baseline for comparison obviously makes meaningful comparison and analysis much more difficult. Lastly, we believe such a comparison (to the much higher theoretical number) would only serve to make Alternative 3 appear more acceptable than it really is in terms of the relative severity of its impacts.

We therefore recommend that NPS consider “the existing number of flights with current operating parameters” as the No Action Alternative in the EA. It would provide a much more accurate description of what has actually been happening under a “No ATMP” scenario; and thus allow for more meaningful analysis and comparison(s) between the No Action and the Action Alternatives.

5. Action Alternatives (pp. 11-22): General Comment - In general, alternatives 2-4 provide a range of alternatives as required by NEPA. Of these, Alternative 2, no air tours, would undoubtedly cause the least amount of impacts; and Alternative 3 (Daily Cap of 25 Air Tours with Additional Modifications) would cause the most severe impacts, based largely on the proposed flight numbers. In contrast, Alternative 4 (Daily Cap of 13 Air Tours with Additional Modifications) would cause a moderate level of impacts.

A concern is that the differentiation between action alternatives 3 and 4 is not as great as it could, or perhaps should, be, to provide for a meaningful comparison of “Alternative Attributes” and associated impacts. As summarized in Table 6, except for the differences in annual and daily flight number limits, Alternatives 3 and 4 are virtually the same on all other Attributes, including ALL of the following: Routes; Minimum Altitudes; Time of Day; Seasonal Restrictions; Day of Week; Quiet Technology (QT) Incentives; Operator Training and Education; Annual Meeting; Restrictions for Particular Events; Adaptive Management; and Amendments.

We have specific concerns about some of the Attributes described for Alternatives 2 and 3. To provide a more meaningful analysis and comparison of potential impacts that may be caused by the respective alternatives (as a result of their Attributes), we recommend that NPS consider varying (between Alternatives 2 and 3) the Attributes that are most likely to contribute to the overall level of impacts. We will provide suggestions for revising those Attributes in our comments about Alternative 4 below.

6. Alternative 2: No Air Tours in the Planning Area (pp. 11-13) - We strongly endorse Alternative 2 because, as described in the newsletter, it “would provide the greatest protection of the Park's natural and cultural resources and visitor experience management objectives.” However, we are very concerned with the boilerplate language used in the “Amendment” section on p. 12, which states that “the ATMP may be amended at any time” if either the NPS or the FAA notifies the other agency. This seems to unnecessarily leave the door open for future resumption of commercial air tours at MORU, even if the final ATMP were to eliminate all air tours.

Our experience has been that many NPS decisions to curtail or eliminate controversial recreational and commercial activities in parks, such as commercial air tours, ORV use, hunting, etc., are subject to industry lobbying and political reversal, especially when there is a change in administration. The Amendment provision in Alternative 2 provides no certainty that air tours would, in fact, remain eliminated at MORU if this alternative were selected. We therefore ask NPS to eliminate the “Amendment” provision in this alternative, so that a decision to eliminate air tours at MORU is “final” and cannot be easily reversed without the agencies initiating and completing an entirely new planning process.

7. Alternative 3: Daily Cap of 25 Air Tours with Additional Modifications (pp. 14-10) - In general, we do not support Alternative 3 as it would cause the most extensive adverse impacts of any of the action alternatives. Our foremost concern about Alternative 3 is that it would allow 3,657 flights annually, which is only 7% fewer than the "existing number" of 3,914 flights that NPS has already "considered but dismissed" because it "would result in unacceptable impacts." See Comment # 4 above.

It is difficult to believe that a mere 7% reduction in the total number of flights could change the impact level from "unacceptable" to "acceptable." We do understand that the small reduction in the number of flights proposed for Alternative 3 would be combined with implementation of operating parameters (or proposed "Alternative Attributes"). However, based on the limited information provided in the newsletter, it is unclear to us how and how much the proposed "Attributes" could sufficiently reduce air tour noise to change the impact level from "unacceptable" to "acceptable" for nearly the same number of flights that NPS determined would cause "unacceptable impacts" under "current operating parameters." We therefore ask NPS to explain in the EA how and to what extent specific Attributes would, in fact, reduce impacts compared to the current situation. This should include whatever information and evidence NPS has to support whatever the purported reduction(s) in noise levels would be if the Attributes are implemented at MORU.

Lastly, we have concerns about some of the Attributes described for Alternative 3, which we believe are not sufficiently protective of the park visitor experience at MORU. However, for the sake of encouraging NPS to analyze a broader range of alternatives and Attributes, we will describe these concerns below in our comments about Alternative 4.

8. Alternative 4: Daily Cap of 13 Air Tours with Additional Modifications (pp. 20-22) - We strongly support the proposed reductions in the annual and daily caps on the number of air tours that would be implemented under this alternative, which are 1,833/year and 13/day respectively (or about 50% fewer flights than would be allowed under Alternative 3). We believe that the most direct and effective way to reduce cumulative air tour impacts is to reduce the total number of flights allowed; and Alternative 4 would clearly accomplish that.

However, our primary concern about Alternative 4 is that it is exactly the same as Alternative 3 for the vast majority of Alternative Attributes that would be implemented. The primary difference between the two would only be the number of flights allowed. As summarized in Table 6, the common Attributes shared by Alternatives 3 and 4 include: Routes and Altitudes; Time of Day, Day of Week, and Seasonal Restrictions; Quiet Technology (QT) Incentives; Restrictions for Particular Events; Adaptive Management; Operator Training and Education; Annual Meeting; Competitive Bidding; Operators, Initial Allocation of Air Tours, Aircraft Types, and Interim Operating Authority; New Entrant; Monitoring and Enforcement; and Amendment.

Having both alternatives share many of the same Attributes unnecessarily limits the range of protective measures being considered and to be analyzed in the EA. As stated previously, the quality of the visitor experience at MORU is closely connected to and dependent upon the quality of the natural setting, including natural ambient sound levels, surrounding the Sculpture. Rather than assume that ALL the common Attributes are "spot on" as proposed, we recommend that NPS consider different levels of intensity for at least some of them. This would expand the range of Attributes being considered and allow for a more meaningful analysis of impacts and comparison of the effectiveness of not only the respective alternatives, but also the Attributes themselves in the EA. We therefore suggest that the following Attributes be revised and considered under Alternative 4:

a. Flight Routes - We have two primary concerns about the proposed flight routes for Alternative 4 as shown in Figure 5. First, we ask NPS to explain the basis for deciding that a 2,600-foot setback from the Sculpture (i.e., the Red circle in Figure 5) is sufficient to minimize aircraft noise on the ground within

the primary viewing areas on the southeast side of the Sculpture. We do not believe that the 2,600-foot setback from the Sculpture will be sufficient to minimize the noise of numerous flights per day that adversely impact the natural setting within which the majority of park visitors view the Sculpture. Furthermore, we suggest that the hard (i.e., rocky) elevated surface of Mount Rushmore likely reflects aircraft sounds coming from that same southeast side of the Sculpture, which may compound the impacts of nuisance aircraft noise experienced from the viewing area. We therefore recommend that NPS consider a 3,900-foot (i.e., 50% larger) setback under Alternative 4 in order to create greater differentiation in the level of impacts between Alternatives 3 and 4. This would allow a more meaningful analysis of the relative impacts of different setback distances as well as of the effectiveness of the proposed 2,600-foot setback distance.

Conversely, if NPS believes that 2,600-foot is setback is completely adequate to protect the visitor experience at Mount Rushmore, then we ask NPS to provide modeling and/or air contour map analysis to support such a finding. Note: There are a number of references describing the modeling of aircraft noise and development of air contour maps (e.g., https://onlinepubs.trb.org/onlinepubs/acrp/acrp_wod_043.pdf; and https://www.faa.gov/regulations_policies/policy_guidance/noise/basics).

Second, the meandering flight routes shown in Figure 5 would allow virtually every air tour to conduct three “fly-bys” on the same southeast side of the Sculpture, with each fly-by leg being located at a different distance. Having the aircraft meander back and forth 3 times just outside the visitor center complex will undoubtedly increase the nuisance factor of aircraft noise impacting park visitors on the ground. We therefore recommend that NPS consider a “two fly-by” route option in Alternative 4. This, when combined with the 3,900 foot setback described above, would eliminate the closest fly-by portion of the routes shown in Figure 5; and thus significantly reduce the impacts of air tour noise to park visitors on the ground.

b. Minimum Altitudes - We have several concerns about Alternative 4's proposed minimum altitudes for helicopters (900 feet AGL) and airplanes (1,300 feet AGL). First, we are particularly concerned about the adequacy of the 900 feet AGL requirement for helicopters. Many of our members have experience working in and around helicopters during the course of their NPS careers (e.g., for wildland firefighting or search and rescue purposes). Our observation is that helicopters typically fly lower and slower and are perceived as being much louder and more annoying to people on the ground than a single-engine airplane flying higher and faster overhead.

Our observation is borne out by multiple references that document that helicopters noise is widely perceived as being louder and more annoying than airplane noise. For example, see: <https://executiveflyers.com/why-are-helicopters-so-loud/>; <https://www.noisequest.psu.edu/sourcesofnoise-helicopternoise.html>; and <https://vtol.org/files/dmfile/12HelicopterNoiseLeverton2.pdf>. According to the Helicopter Association International (HAI), the sound of a helicopter flying at 500 feet is about 87 decibels. At 1,000 feet, the sound drops to 78 decibels, which is still louder than a vacuum cleaner and nearly as loud as a hair dryer (see: <https://aerocorner.com/blog/why-are-helicopters-so-loud/>).

Can you imagine having your once-in-a-lifetime visit to Mount Rushmore ruined by having to listen to someone next to you on the Avenue of Flags using a vacuum cleaner or a hair dryer? Obviously, that is unlikely to happen; yet, NPS is proposing essentially the same sound level equivalent of that (i.e., the same intensity of noise impact) with 900-foot minimum altitude for helicopters at MORU. We could continue identifying references about the how loud and annoying people perceive low flying helicopters to be. However, our point is that the proposed minimum altitude of 900 feet AGL for air tour helicopters is clearly insufficient to minimize nuisance noise intrusions and prevent visitor disturbance within the primary Sculpture viewing areas at MORU.

Our second concern relates to the fact that significant portions of the proposed air tour routes would fly directly over the Black Elk Wilderness adjacent to the memorial. The proposed minimum altitudes are clearly insufficient to prevent significant noise impacts on wilderness character. We recommend that all air tour aircraft be required to fly at least 2,000 feet AGL over designated wilderness.

Last but not least, the proposed minimum altitudes at MORU are considerably lower than FAA's own recommendations for minimizing aircraft noise impacts over national parks, wilderness areas, and other "noise sensitive areas." Specifically, FAA Advisory Circular AC No: 91-36D identifies National Parks, National Wildlife Refuges, Waterfowl Production Areas and Wilderness Areas as "noise sensitive areas"; and recommends that "pilots operating noise producing aircraft (fixed-wing, rotary-wing and hot air balloons) over noise sensitive areas fly not less than 2,000 feet above ground level (AGL), weather permitting." (Emphasis added) See: [https://rgl.faa.gov/Regulatory_and_Guidance_Library/rgAdvisoryCircular.nsf/list/AC 91-36D/\\$FILE/AC91-36d.pdf](https://rgl.faa.gov/Regulatory_and_Guidance_Library/rgAdvisoryCircular.nsf/list/AC%2091-36D/$FILE/AC91-36d.pdf). Similarly, NPS has adopted AC No. 91-36D's recommendation that "All aircraft are requested to maintain a minimum altitude of 2,000 feet above the surface of lands and waters administered by the NPS, UFWS, or USFS Wilderness areas." See: <https://www.nps.gov/articles/mitigating-the-impacts-of-aviation.htm#:~:text=All aircraft are requested to,UFWS, or USFS Wilderness areas.>

Given each agency's recommendations about minimum flight altitudes, the NPS and the FAA have presented no justification for proposing to deviate so significantly from their respective longstanding minimum altitude standard of 2,000 feet AGL over national parks and wilderness areas. To address these concerns and provide a wider range of Attributes for analysis, we recommend that NPS consider minimum altitudes of no less than 1,500 feet AGL for both helicopters and airplanes conducting commercial air tour over the memorial; and at least 2,000 feet AGL over the adjacent wilderness area. If, for aircraft safety reasons, it is necessary to provide altitude separation between helicopter and airplane tour routes, then we recommend that NPS consider a minimum altitude of 1,500 feet AGL for helicopters and 1,800 feet AGL for airplanes. Air tours that wish to fly lower than that can and should remain outside the ATMP Planning Area.

c. Time of Day - As proposed, Alternative 4 would allow air tours to fly from one hour after sunrise until one hour before sunset for non-QT flights; and from sunrise to sunset for QT flights, the same as Alternative 3. The proposed schedule will make it extremely difficult for park visitors to plan to see the Sculpture when air tours are not occurring. We believe that park visitors traveling to western South Dakota for a once-in-a-lifetime visit to Mount Rushmore should have a reasonable opportunity to see the Sculpture in its natural setting, absent intrusive air tour noise, for at least a few hours every day. For this reason and to provide a broader range of Attributes and related impacts to analyze in the EA, we recommend that in Alternative 4 NPS consider time of day restrictions that would allow air tours to fly from three hours after sunrise until three hours before sunset. This minor adjustment would triple the amount of air tour noise-free quiet time in the morning and the afternoon.

While we have read what the newsletter says about Quiet Technology Incentives (QTI), NPS has provided no description or data regarding how much measurable sound reduction QTI would provide. For example, would it reduce sound levels by 10 dBA, 20 dBA, or more? And is it reasonable to think that a local air tour company in western South Dakota would have the financial resources to invest in technologically advanced but expensive QT helicopters?

As a result, we cannot offer an informed comment about what time of day restrictions would be appropriate for QT aircraft; and we do not know if it is financially realistic for the tour operator(s) to implement in this case. However, since NPS does propose a Quiet Technology Incentive in the newsletter, we ask NPS to provide more detailed information in the EA about what the public could expect in terms of the measurable sound reduction when QT aircraft are used. If the noise reduction is substantial, then we recommend that Alternative 4 allow QT aircraft to fly from one hour after sunrise

until one hour before sunset not. If the noise reduction is not substantial, then we recommend that QT aircraft be limited to the same time of day restrictions as other aircraft. Our intent in making these recommendations is to eliminate early morning and late afternoon air tour noise so that park visitors have at least a small opportunity each morning and afternoon to experience the natural sounds of the memorial without hearing intrusive air tour noise.

d. Operator Training and Education - As described in Table 6, operator training and education is "mandatory if requested and/ or made available by the NPS." What does this really mean? If requested by whom? It sounds like training is actually optional unless NPS decides it is mandatory, presumably at the park level. We understand that the MORU newsletter is using boilerplate language that has been previously used in other ATMP newsletters and that the decision of whether to require training is likely to be made at the park level. However, since this newsletter applies specifically to MORU, why can't the park decide if it wants to require training or not, and then present that as the proposed Attribute for this alternative?

Having dealt with a variety of other commercially guided tours in parks, we would highly recommend that under Alternative 4 NPS require and provide annual air tour operator and pilot training at MORU (i.e., train not only the owners/operators/permittees, but also their pilots). It would not only increase the chances of operator and pilot compliance with the ATMP requirements, it would also provide an opportunity for NPS to share accurate information with operators regarding park history, significance, and interpretive themes - all information the operator could and should share with its customers to provide a more informative experience to people visiting the park "from above."

e. Amendments - As described in Table 6, the ATMP may be amended at any time upon notification of either agency to the other. Similar to our concern under Alternative 2, the way this Attribute is written creates tremendous uncertainty about the longevity of whatever ATMP details the agencies decide upon this time. It opens the door for political pressure and industry lobbying to expand the numbers of flights allowed or to "relax" (i.e., weaken) measures intended to minimize the adverse impacts of air tour noise.

Since it has taken NPS and the FAA over 20 years (since the passage of the Act) to begin preparation of the park's first ATMP, we would hope the new ATMP would provide stable, long-term guidance for the management of air tours at MORU. However, something that can be "amended at any time" is neither stable nor long-term. We therefore recommend that NPS revise the wording of this Attribute for Alternative 4 to convey the notion that "the ATMP is intended to provide long-term guidance for the management of air tours at MORU. However, future minor adjustments may be made in the ATMP upon the request of either agency to address concerns that arise after its implementation."

9. The EA should identify the NPS "preferred alternative" as well as the "environmentally preferable alternative" as described in the NPS NEPA Handbook 2015, Section 4.3: See: https://www.nps.gov/subjects/nepa/upload/NPS_NEPAHandbook_Final_508.pdf.

As described in handbook section 4.3(C), "A preferred alternative is the alternative that 'would best accomplish the purpose and need of the proposed action while fulfilling [the NPS] statutory mission and responsibilities, giving consideration to economic, environmental, technical, and other factors' (46.420(d)). It is standard NPS practice to identify the preferred alternative in EAs[.]"

As described in handbook section 4.3 (D), "The environmentally preferable alternative is the alternative developed and analyzed during the NEPA process 'that causes the least damage to the biological and physical environment and best protects, preserves, and enhances historical, cultural, and natural resources' (46.30). An environmentally preferable alternative must be identified in a ROD and may be identified in EAs, FONSI, and draft and final EISs (1505.2(b); 46.450)." (Emphasis added)

The value of NPS identifying both the preferred alternative and the environmentally preferable alternative in this EA is that it would add much needed transparency to what has been a rather murky and not always public process for the past 20 years. While we appreciate that the agencies are now finally moving forward with the ATMP planning process at MORU, the fact remains that stakeholders had to file litigation in order to force NPS and the FAA to comply with the provisions of the National Parks Air Tour Management Act of 2000 after many years of ineffective progress by the agencies. Improving transparency in the planning process now would be a helpful step toward restoring public confidence that NPS is fully committed to its conservation mandate such that "when there is a conflict between conserving resources and values and providing for enjoyment of them, conservation is to be predominant."

In closing, we appreciate the opportunity to comment on this important issue.

Sincerely,

Michael B. Murray

Chair

cc: Bert Frost, Director of Regions 3, 4, and 5, National Park Service

Karen Trevino, Chief, Natural Sounds and Night Skies Division, National Park Service

Ray Sauvajot, Associate Director for Natural Resource Stewardship and Science, NPS

Correspondence ID:	132	Project: 97377	Document:	123303
Name:	,			
Received:	Oct,03 2022 15:28:55			
Correspondence Type:	Web Form			

Correspondence: No helicopter air traffic allowed within the boundaries Memorial Boundary.
Disturbs wildlife and visitors

Correspondence ID:	133	Project: 97377	Document:	123303
Name:	Kretschmar, Luke			
Received:	Oct,03 2022 17:07:49			
Correspondence Type:	Web Form			

Correspondence: Hello.

As president of the Black Hills Climbers Coalition we are calling for a no fly zone around the memorial.
Thanks.

Luke Kretschmar

Correspondence ID:	134	Project: 97377	Document:	123303
Name:	, Steve			
Received:	Oct,03 2022 18:18:10			
Correspondence Type:	Web Form			

Correspondence: In my opinion, Alternative 2 to the ATMP should be adopted - No Air Tours.

I feel there should be no air tours over Mount Rushmore, Black Elk Wilderness, and Custer State Park. These are very natural areas and the near constant drone of the helicopters is a real nuisance. The Helicopters are a visual distraction, but the real problem is the noise pollution.

I do not want to be against someone's business, but I think they certainly could find other scenic areas to fly that would still please their clients.

Correspondence ID:	135	Project: 97377	Document:	123303
Name:	Olson, Shamus			
Received:	Oct,03 2022 18:36:42			
Correspondence Type:	Web Form			

Correspondence: I grew up visiting the Black Hills and Rushmore area as a kid and have continued coming back to climb, bike and hike in the surrounding area. I believe there should be no flights over Rushmore, Custer State park, or the Black Elk wilderness. It is a great distraction and large amount of noise pollution. At a minimum there needs to be elevation restriction. It is awful to be enjoying a nice quiet day in the woods and then have a helicopter buzz over at 100ft making a lot of noise.

Correspondence ID:	136	Project: 97377	Document:	123303
Name:	MacDonald, Ian			
Received:	Oct,04 2022 08:43:56			
Correspondence Type:	Web Form			

Correspondence: Hello,

I am an avid outdoor user of the Mount Rushmore National Memorial (and Black Elk Wilderness). As someone who spends a lot of time hiking, climbing and trail running within the National Memorial boundary I would encourage the park to employ the Alternative 2 plan (no air tours in the planning area).

Helicopter tours have a major impact on my ability to enjoy the peace and quiet of the outdoors while within the boundary. I will often go several hours without seeing another person, however during that time I will hear several loud helicopters fly overhead. When this happens it completely removes me from the beauty that the landscape provides.

As a climber the loud interruption of the helicopter is also a safety concern. When a helicopter flies overhead there will be a 30-60 second period where a climber and a belayer cannot communicate with each other. At a minimum this is a frustrating annoyance, but at a maximum there are safety implications if a climber is misheard or not heard at all and an incorrect action is taken by the belayer.

In order to preserve the wilderness as true wilderness I strongly encourage the park to consider Alternative 2 as laid out in the MORU scoping newsletter.

Thank you,

Ian

Correspondence ID:	137	Project: 97377	Document:	123303
Name:	Morrison, Amanda			
Received:	Oct,04 2022 08:50:07			
Correspondence Type:	Web Form			

Correspondence: October 4, 2022

Volpe National Transportation Systems Center

Kaitlyn Rimol, V-326

Attn: Mount Rushmore National Memorial ATMP

55 Broadway

Cambridge, MA 02142

To Mount Rushmore National Memorial ATMP:

The South Dakota Department of Agriculture and Natural Resources, Resource Conservation & Forestry Division (RCF) in coordination with the Department of Game, Fish, and Parks (GFP) has completed its review of the Mount Rushmore National Memorial Air Tour Management Plan Scoping Letter and respectfully submit the following comments.

RCF & GFP supports the purpose and need for developing acceptable and effective measures to mitigate or prevent adverse impacts of commercial air tour operations on the natural and cultural resources, tribal sacred sites and ceremonial areas, wilderness character, and visitor experience; though there is concern that the alternatives presented do not go far enough to address impacts on the natural resources and wilderness character of the Mount Rushmore National Memorial (MRNM).

The MRNM is home to a variety of wildlife, including the mountain goat (*Oreamnos americanus*). The South Dakota Mountain Goat Management Plan, 2018-2027 highlights the increasing demand for use of public lands for recreational activities while also highlighting the sensitivity of these animals to human disturbances. The Black Hills has limited escape terrain and it is critical that those areas remain secure from human disturbance as to not increase the probability of predation risk (SDGFP, 2018). Escape terrain is a term often used to describe steep, broken, rocky terrain consisting of rocky outcrops, ledges, and cliffs.

A study conducted in 1995 found helicopter flights caused the disintegration of social groups and the distance between mountain goat groups and the helicopter was the most important factor affecting their behavior (Cote, 1996). A follow-up study looked at habituation of mountain goats to helicopter disturbance over a 10-year period and found the goats are only very slightly habituated to helicopter flights (Cote, 2013). Both studies concluded that mountain goats had a very high probability of being moderately and strongly disturbed when approached within 500m of a helicopter.

Cote (1996) suggested helicopters should remain $\geq 2\text{km}$ away from goat herds and alpine areas and cliffs known to support mountain goat populations to minimize disturbance; and in cases where helicopters must infringe on goat habitats, aircraft should stay $\geq 300\text{m}$ (984 ft.) above ground level.

The current above ground level of all four rotary wing (helicopter) routes, in Alternatives 1, 3 and 4 is 900 ft.

In addition, at the point the helicopter's take their 1st turn into the tight S-turn is a granite rock outcrop, mountain goats are known to occupy this outcrop and have been recorded during SDGFP's mountain goat surveys (which is conducted every 2 years) and is a core area for mountain goats. This rock outcrop is also passed over by the fixed wing airplane twice; once as it begins the big loop and again as it exits the loop.

We are proposing that additional Alternatives be considered for the ATMP. Alternatives that not only address the frequency of flights, but also the flight path and altitude. We suggest, additional alternatives (or a revision to the current alternatives) be considered that address the impact helicopters have on the resident mountain goat population and specify a minimum above ground level flight path of no less than 300m or 984 ft.

Mountain goats give birth from mid-May to early June, and it is thought that the parturition window is short, where roughly 80% of kids are born within 2 weeks of the first birth (SDGFP, 2018). It is very important these core areas are protected during this vulnerable time; therefore, we suggest adjusting the

current proposed seasonal restrictions of Alternatives 3 and 4 to include the mountain goat parturition window (May 15 - June 15) and not allow flights to occur.

RCF & GFP supports the idea of seasonal restrictions and restrictions for specific events as identified in Alternatives 3 and 4; but would also ask for additional restrictions to be considered. Allowing air tours any day of the week, albeit reduced in numbers does not adequately provide relief from the noise of air tours to visitors & wildlife of Black Elk Wilderness. Allowing for 'quiet' days, or through additional tour hour limitations for those aircraft which do not utilize quiet technology could further improve the wilderness character and visitor experience of Black Elk Wilderness.

Thank you for the opportunity to comment on this project. Please contact Amanda Morrison at 605-394-2279, or John Kanta at 605-394-2391 if you have any questions.

Sincerely,

Amanda Morrison, Natural Resource Planner, RCF

John Kanta, Terrestrial Section Chief, GFP

Literature Cited Above:

South Dakota Department of Game, Fish and Parks. 2018. South Dakota Mountain Goat Management Plan, 2018-2027. Completion Report 2018-01. South Dakota Department of Game, Fish and Parks, Pierre, South Dakota, USA.

Côté, S.D. 1996. Mountain Goat Responses to Helicopter Disturbance. Wildlife Society Bulletin 24:681-685.

Côté, S. D. S. Hamel, A. St-Louis, and J. Mainguy. 2013. Do mountain goats habituate to helicopter disturbance? Journal of Wildlife Management 77: 1244-1248.

Correspondence ID:	138	Project: 97377	Document:	123303
Name:	,			
Received:	Oct,04 2022 09:07:18			
Correspondence Type:	Web Form			

Correspondence: As a local Black Hills outdoor enthusiast, conservationist and rock climber, I highly encourage the FAA and Mount Rushmore National Memorial to pursue Alternative 2. It is disappointing to be out in the nature and experience such noise pollution in an area that holds precious wildlife and is location designated as an 'escape' from an urban environment. I cannot begin to imagine how disrupting the noise is to the bird and mammal habitats. Second, it is concerning to be up on a rock climbing route and not be able to communicate to your belayer due to the loud buzz of a helicopter flying at a relatively low altitude. Third, I have lived in the Black Hills long enough to know that regardless of a flying altitude restriction, I have often witnessed the helicopters flying lower than permitted; these regulations are often not taken seriously. Thank you for your consideration.

Correspondence ID:	139	Project: 97377	Document:	123303
Name:	brummitt, David			
Received:	Oct,04 2022 10:22:32			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

NPOAG guidance is critical to the safety and economic stability of the air tour industry while balancing the needs of the environment, tribal interests, the NPS, and the FAA. Excluding NPOAG in the ATMP process is negligent and violates congressional intent.

The Public Scoping Documents serve to pre-shape public comment by offering options with no justification or data to support the offerings. This is a terribly flawed process, moving forward without critical NPOAG input, to produce an agency desired outcome.

Without the expertise and safety input from stakeholders, operators, and the NPOAG, serious safety concerns will arise as the NPS, with no expertise, moves, compresses, combines and shifts flight routes and altitudes that have been in place for years. The very routes in question were designed jointly between operators and the local Park Unit stakeholders.

Aerial tourism at Mt. Rushmore dates back to the 1960s. The economic impact these plans will have on the existing air tour companies threatens to shut down businesses that have been operating safely and responsibly for the past 30 years. This impact has reverberating consequences for the local and state economy, both of which are required elements of consideration and have been ignored.

Aerial tourism provides significant workforce development opportunities that support other sectors of the vertical lift industry to include firefighting and emergency medical services. The elimination of this workforce pool would exacerbate current pilot shortages and have impacts well beyond the limited footprint of the Mt Rushmore National Memorial.

The proposed options suggest flight allocation numbers that do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change, and NPS should in good faith respect that dynamic, as visitors alter their destinations and activities according to those trends.

Air tours are a vital option for many visitors providing a once-in-a-lifetime opportunity to experience natural and man-made landmarks. Visitors choosing aerial tourism represent the lowest impact to any park, recreation area, or memorial. Aerial tourism reduces impacts to parks, recreation areas and memorials. Aerial tourism provides the lowest form of impact in the park, leaving absolutely no trace, while reducing congestion and demand on park infrastructure in a significant way. For the NPS to ignore this fact is disingenuous at best.

By further restricting an already very limited number of allowable air tours, we are reducing the most environmentally responsible access to Mt. Rushmore, which is in opposition to the very goals stated by the NPS in the Public Scoping Documents. Through strict altitude and route requirements to mitigate noise just to name a few efforts air-tour operators are continually working to ensure they are responsible stewards of the environment.

Currently, there are no restrictions or mitigation efforts for other vehicles operating inside the boundaries of Mt. Rushmore. For example, throughout the summer months, heavy motorcycle traffic at the memorial produces far more impact than aerial tourism. A study was completed by the Town of Keystone, adjacent to the memorial that clearly shows this to be the case.

For individuals and groups with disabilities, aerial tourism provides the access promised in the mission of the NPS. The Memorial should be available for all visitors to enjoy. Limiting flights within the memorial boundary unfairly limits the elderly, very young, handicapped, and others who wish to

experience the memorial. Limiting flights over the Memorial restricts access for those who might not have the time, resources, or physical ability to see the memorial any other way.

The NPS cannot independently drive the ATMP process behind closed doors. I strongly urge you to consult with the stakeholders, operators and NPOAG on the further development of the ATMPs to collaboratively address the concerns as an alternative to the current flawed approach. There's laws in place to protect the rights of these air tour companies. Restricted more air space will be a big blow to the economy and air tour companies. Do any of you read and abide by the laws or rules set forth ?

Correspondence ID:	140	Project: 97377	Document:	123303
Name:	Leon, McInelly			
Received:	Oct,04 2022 10:28:02			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA).

As a disabled veteran aerial tourism provides me and other individuals with disabilities, the access promised in the mission of the NPS. The Memorial should be available for all visitors to enjoy. Limiting flights within the memorial boundary unfairly limits the elderly, very young, handicapped, and others who wish to experience the memorial. National Parks are for the benefit of all not just the personal playground for the Park Service.

The NPS and the FAA have ignored the general public, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

Air tours are a vital option for many visitors providing a once-in-a-lifetime opportunity to experience natural and man-made landmarks.

Visitors choosing aerial tourism represent the lowest impact to any park, recreation area, or memorial. Aerial tourism reduces impacts to parks, recreation areas and memorials. Aerial tourism provides the lowest form of impact in the park, leaving absolutely no trace, while reducing congestion and demand on park infrastructure in a significant way. For the NPS to ignore this fact is disingenuous at best.

Currently, there are no restrictions or mitigation efforts for other vehicles operating inside the boundaries of Mt. Rushmore. For example, throughout the summer months, heavy motorcycle traffic at the memorial produces far more impact than aerial tourism. A study was completed by the Town of Keystone, adjacent to the memorial that clearly shows this to be the case.

The NPS cannot independently and willfully disregard Congressional issued National Parks Air Tour Management Act of 2000 and drive the ATMP process behind closed doors. I strongly urge you to consult with the stakeholders, operators and NPOAG on the further development of the ATMPs to collaboratively address the concerns as an alternative to the current flawed approach.

Thank you for the opportunity to comment.

Correspondence ID:	141	Project: 97377	Document:	123303
Name:	Mulkern, Coleman			
Received:	Oct,04 2022 10:32:47			

Correspondence Type:

Web Form

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

NPOAG guidance is critical to the safety and economic stability of the air tour industry while balancing the needs of the environment, tribal interests, the NPS, and the FAA. Excluding NPOAG in the ATMP process is negligent and violates congressional intent.

The Public Scoping Documents serve to pre-shape public comment by offering options with no justification or data to support the offerings. This is a terribly flawed process, moving forward without critical NPOAG input, to produce an agency desired outcome.

Without the expertise and safety input from stakeholders, operators, and the NPOAG, serious safety concerns will arise as the NPS, with no expertise, moves, compresses, combines and shifts flight routes and altitudes that have been in place for years. The very routes in question were designed jointly between operators and the local Park Unit stakeholders.

Aerial tourism at Mt. Rushmore dates back to the 1960s. The economic impact these plans will have on the existing air tour companies threatens to shut down businesses that have been operating safely and responsibly for the past 30 years. This impact has reverberating consequences for the local and state economy, both of which are required elements of consideration and have been ignored.

Aerial tourism provides significant workforce development opportunities that support other sectors of the vertical lift industry to include firefighting and emergency medical services. The elimination of this workforce pool would exacerbate current pilot shortages and have impacts well beyond the limited footprint of the Mt Rushmore National Memorial.

The proposed options suggest flight allocation numbers that do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change, and NPS should in good faith respect that dynamic, as visitors alter their destinations and activities according to those trends.

Air tours are a vital option for many visitors providing a once-in-a-lifetime opportunity to experience natural and man-made landmarks. Visitors choosing aerial tourism represent the lowest impact to any park, recreation area, or memorial. Aerial tourism reduces impacts to parks, recreation areas and memorials. Aerial tourism provides the lowest form of impact in the park, leaving absolutely no trace, while reducing congestion and demand on park infrastructure in a significant way. For the NPS to ignore this fact is disingenuous at best.

By further restricting an already very limited number of allowable air tours, we are reducing the most environmentally responsible access to Mt. Rushmore, which is in opposition to the very goals stated by the NPS in the Public Scoping Documents. Through strict altitude and route requirements to mitigate noise just to name a few efforts air-tour operators are continually working to ensure they are responsible stewards of the environment.

Currently, there are no restrictions or mitigation efforts for other vehicles operating inside the boundaries of Mt. Rushmore. For example, throughout the summer months, heavy motorcycle traffic at the memorial produces far more impact than aerial tourism. A study was completed by the Town of Keystone, adjacent to the memorial that clearly shows this to be the case.

For individuals and groups with disabilities, aerial tourism provides the access promised in the mission of the NPS. The Memorial should be available for all visitors to enjoy. Limiting flights within the memorial boundary unfairly limits the elderly, very young, handicapped, and others who wish to experience the memorial. Limiting flights over the Memorial restricts access for those who might not have the time, resources, or physical ability to see the memorial any other way.

The NPS cannot independently drive the ATMP process behind closed doors. I strongly urge you to consult with the stakeholders, operators and NPOAG on the further development of the ATMPs to collaboratively address the concerns as an alternative to the current flawed approach.

As important as all these points are I feel the most egregious is the whittling away of the FAAs authority to regulate airspace. The more we let owners and managers of property on the surface regulate what happens above them the more watered down the FAAs control becomes. Soon you will have every little community citing the precedent set here as a form of discrimination if you dont let them control the sky above their domains. We certainly do not want to head down that path.

Correspondence ID:	142	Project: 97377	Document:	123303
Name:	Laird, Brandon			
Received:	Oct,04 2022 10:51:59			
Correspondence Type:	Web Form			

Correspondence: Focus elsewhere. Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

NPOAG guidance is critical to the safety and economic stability of the air tour industry while balancing the needs of the environment, tribal interests, the NPS, and the FAA. Excluding NPOAG in the ATMP process is negligent and violates congressional intent.

The Public Scoping Documents serve to pre-shape public comment by offering options with no justification or data to support the offerings. This is a terribly flawed process, moving forward without critical NPOAG input, to produce an agency desired outcome.

Without the expertise and safety input from stakeholders, operators, and the NPOAG, serious safety concerns will arise as the NPS, with no expertise, moves, compresses, combines and shifts flight routes and altitudes that have been in place for years. The very routes in question were designed jointly between operators and the local Park Unit stakeholders.

Aerial tourism at Mt. Rushmore dates back to the 1960s. The economic impact these plans will have on the existing air tour companies threatens to shut down businesses that have been operating safely and responsibly for the past 30 years. This impact has reverberating consequences for the local and state economy, both of which are required elements of consideration and have been ignored.

Aerial tourism provides significant workforce development opportunities that support other sectors of the vertical lift industry to include firefighting and emergency medical services. The elimination of this workforce pool would exacerbate current pilot shortages and have impacts well beyond the limited footprint of the Mt Rushmore National Memorial.

The proposed options suggest flight allocation numbers that do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change, and NPS should in good faith respect that dynamic, as visitors alter their destinations and activities according to those trends.

Air tours are a vital option for many visitors providing a once-in-a-lifetime opportunity to experience natural and man-made landmarks. Visitors choosing aerial tourism represent the lowest impact to any park, recreation area, or memorial. Aerial tourism reduces impacts to parks, recreation areas and memorials. Aerial tourism provides the lowest form of impact in the park, leaving absolutely no trace, while reducing congestion and demand on park infrastructure in a significant way. For the NPS to ignore this fact is disingenuous at best.

By further restricting an already very limited number of allowable air tours, we are reducing the most environmentally responsible access to Mt. Rushmore, which is in opposition to the very goals stated by the NPS in the Public Scoping Documents. Through strict altitude and route requirements to mitigate noise just to name a few efforts air-tour operators are continually working to ensure they are responsible stewards of the environment.

Currently, there are no restrictions or mitigation efforts for other vehicles operating inside the boundaries of Mt. Rushmore. For example, throughout the summer months, heavy motorcycle traffic at the memorial produces far more impact than aerial tourism. A study was completed by the Town of Keystone, adjacent to the memorial that clearly shows this to be the case.

For individuals and groups with disabilities, aerial tourism provides the access promised in the mission of the NPS. The Memorial should be available for all visitors to enjoy. Limiting flights within the memorial boundary unfairly limits the elderly, very young, handicapped, and others who wish to experience the memorial. Limiting flights over the Memorial restricts access for those who might not have the time, resources, or physical ability to see the memorial any other way.

The NPS cannot independently drive the ATMP process behind closed doors. I strongly urge you to consult with the stakeholders, operators and NPOAG on the further development of the ATMPs to collaboratively address the concerns as an alternative to the current flawed approach.

Correspondence ID:	143	Project: 97377	Document:	123303
Name:	Mehrer, Ruby			
Received:	Oct,04 2022 11:01:32			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial. Having been involved in the air ambulance industry for nearly 40 years gives me an unique appreciation of the role of helicopters and fixed wing aircraft in the civilian world. These tour companies help grow the pilots we need in the Emergency Medical Services field. Our flight hours requirements of pilots are daunting. Your actions are highly concerning. Your pressing forward with process without the NPOAG at the table is negligent and reckless.

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

NPOAG guidance is critical to the safety and economic stability of the air tour industry while balancing the needs of the environment, tribal interests, the NPS, and the FAA. Excluding NPOAG in the ATMP process is negligent and violates congressional intent.

The Public Scoping Documents serve to pre-shape public comment by offering options with no justification or data to support the offerings. This is a terribly flawed process, moving forward without critical NPOAG input, to produce an agency desired outcome.

Without the expertise and safety input from stakeholders, operators, and the NPOAG, serious safety concerns will arise as the NPS, with no expertise, moves, compresses, combines and shifts flight routes and altitudes that have been in place for years. The very routes in question were designed jointly between operators and the local Park Unit stakeholders.

Aerial tourism at Mt. Rushmore dates back to the 1960s. The economic impact these plans will have on the existing air tour companies threatens to shut down businesses that have been operating safely and responsibly for the past 30 years. This impact has reverberating consequences for the local and state economy, both of which are required elements of consideration and have been ignored.

Aerial tourism provides significant workforce development opportunities that support other sectors of the vertical lift industry to include firefighting and emergency medical services. The elimination of this workforce pool would exacerbate current pilot shortages and have impacts well beyond the limited footprint of the Mt Rushmore National Memorial.

The proposed options suggest flight allocation numbers that do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change, and NPS should in good faith respect that dynamic, as visitors alter their destinations and activities according to those trends.

Air tours are a vital option for many visitors providing a once-in-a-lifetime opportunity to experience natural and man-made landmarks. Visitors choosing aerial tourism represent the lowest impact to any park, recreation area, or memorial. Aerial tourism reduces impacts to parks, recreation areas and memorials. Aerial tourism provides the lowest form of impact in the park, leaving absolutely no trace, while reducing congestion and demand on park infrastructure in a significant way. For the NPS to ignore this fact is disingenuous at best.

By further restricting an already very limited number of allowable air tours, we are reducing the most environmentally responsible access to Mt. Rushmore, which is in opposition to the very goals stated by the NPS in the Public Scoping Documents. Through strict altitude and route requirements to mitigate noise just to name a few efforts air-tour operators are continually working to ensure they are responsible stewards of the environment.

Currently, there are no restrictions or mitigation efforts for other vehicles operating inside the boundaries of Mt. Rushmore. For example, throughout the summer months, heavy motorcycle traffic at the memorial produces far more impact than aerial tourism. A study was completed by the Town of Keystone, adjacent to the memorial that clearly shows this to be the case.

For individuals and groups with disabilities, aerial tourism provides the access promised in the mission of the NPS. The Memorial should be available for all visitors to enjoy. Limiting flights within the memorial boundary unfairly limits the elderly, very young, handicapped, and others who wish to experience the memorial. Limiting flights over the Memorial restricts access for those who might not have the time, resources, or physical ability to see the memorial any other way.

The NPS cannot independently drive the ATMP process behind closed doors. I strongly urge you to consult with the stakeholders, operators and NPOAG on the further development of the ATMPs to collaboratively address the concerns as an alternative to the current flawed approach.

Correspondence ID:	144	Project: 97377	Document:	123303
Name:	Brumbaugh, Wyatt O			
Received:	Oct,04 2022 11:30:37			
Correspondence Type:	Web Form			

Correspondence: The helicopter tours in the National Memorial are constant and for this being a memorial and a sight of natural wonder it is not only disturbing it is repulsive. I being a climber already dislike the helicopter tours because of their proximity to climbers and the rock, after the crash on the Needles Highway and the deaths thereof, although I had not yet been born i see the memorial plack every time i drive past. I would like the Helicopters to not be permitted within park boundaries and for them to be banned from air tours for the foreseeable future.

Correspondence ID:	145	Project: 97377	Document:	123303
Name:	Brumbaugh, Wyatt O			
Received:	Oct,04 2022 11:31:07			
Correspondence Type:	Web Form			

Correspondence: The helicopter tours in the National Memorial are constant and for this being a memorial and a sight of natural wonder it is not only disturbing it is repulsive. I being a climber already dislike the helicopter tours because of their proximity to climbers and the rock, after the crash on the Needles Highway and the deaths thereof, although I had not yet been born i see the memorial plack every time i drive past. I would like the Helicopters to not be permitted within park boundaries and for them to be banned from air tours for the foreseeable future.

Correspondence ID:	146	Project: 97377	Document:	123303
Name:	Bellisle, Laura			
Received:	Oct,04 2022 11:36:04			
Correspondence Type:	Web Form			

Correspondence: As a climber, it sometimes scares me to have helicopters fly so close to where we climb. A minimum elevation would help keep climbers safe! Thank you for your consideration.

Correspondence ID:	147	Project: 97377	Document:	123303
Name:	,			
Received:	Oct,04 2022 12:30:29			
Correspondence Type:	Web Form			

Correspondence: I have been around the Black Hills of SD for the past 12 years. In that time I have enjoyed climbing, biking, hiking, working as a nurse, taking scenic drives, viewing historical landmarks, and gardening. There are many traits that make the Black Hills what it is. Some of them positive, and some of them negative. This positivity and negativity presents different to every individual that shares the Black Hills.

Everyone holds differing hobbies and opinions. For me, one of the biggest positives includes sharing a wild space that isn't crowded and overloaded with too many people (yet). There is ample wild spaces, public land, and remote locations one can go to escape the buzz, no matter the time of year. One can even escape part of the bustle and the noise from the Sturgis Motorcycle Rally if willing to hike/travel into the more remote areas of the Black Hills. The one exception to this rule, is involving aircraft. No matter where one goes, no matter the time of year, the noise and disruption caused by aircrafts cannot be escaped or controlled. Whether it be from the air force base, helicopter tour companies, medical

helicopters/fixed wings, or the commercial airports, the noise and disruption exists constantly. That being said, many of these functions cannot be controlled or changed.

That's why I think it even more important to take advantage of the opportunity to mitigate some of the noise and disruptions. These wild places that are presented to the public are supposed to be just that, wild. There are regulations for other mechanicals and aircrafts ("Launching, landing or operating remotely piloted aircraft within Mount Rushmore National Memorial is prohibited"(36 CFR 1.5)). Why then shouldn't there be regulations for the most intrusive loud type of machine that plagues the Black Hills? I think regulations on flight elevation, duration, flight routes, and the number of flights allowed is a great start for catering towards every party involved. No businesses need to be jeopardized. Yet, the disruption of sacred wild places and the negative effects it has on peoples' (and animals') experiences, can be mitigated or lessened.

I could go into memories and experiences of the past and present, explaining situations where the carelessness, close proximity, loudness, and frequency of helicopter flights has impacted others and myself. Impacted not only the experience of enjoying the outdoors, but also impacted the safety of our health and even our lives. Ultimately however, the details and intensity of these stories are unnecessary when you look at the bigger picture, what really matters- common sense, fairness, and consideration to all who experience these areas. Climbers and other people of various passions have respected and followed wilderness and monument rules of no mechanics (motorized vehicles/bikes, hand drilling bolts vs power drilling, drones, highlining locations/protection, and many more). Although this project plan covers only the Rushmore National Monument area, I would argue to say that any public land or wilderness (Custer State Park, Black Elk Wilderness, Black Hills National Forest) that falls ill to this same problem should also be included in this regulation consideration.

Thank you!!

Mary B

Correspondence ID:	148	Project: 97377	Document:	123303
Name:	Rogne, Joshua			
Received:	Oct,04 2022 12:33:16			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

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and altitudes that have been in place for years. The very routes in question were designed jointly between operators and the local Park Unit stakeholders.

Aerial tourism at Mt. Rushmore dates back to the 1960s. The economic impact these plans will have on the existing air tour companies threatens to shut down businesses that have been operating safely and responsibly for the past 30 years. This impact has reverberating consequences for the local and state economy, both of which are required elements of consideration and have been ignored.

Aerial tourism provides significant workforce development opportunities that support other sectors of the vertical lift industry to include firefighting and emergency medical services. The elimination of this workforce pool would exacerbate current pilot shortages and have impacts well beyond the limited footprint of the Mt Rushmore National Memorial.

The proposed options suggest flight allocation numbers that do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change, and NPS should in good faith respect that dynamic, as visitors alter their destinations and activities according to those trends.

Air tours are a vital option for many visitors providing a once-in-a-lifetime opportunity to experience natural and man-made landmarks. Visitors choosing aerial tourism represent the lowest impact to any park, recreation area, or memorial. Aerial tourism reduces impacts to parks, recreation areas and memorials. Aerial tourism provides the lowest form of impact in the park, leaving absolutely no trace, while reducing congestion and demand on park infrastructure in a significant way. For the NPS to ignore this fact is disingenuous at best.

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Correspondence ID:	149	Project: 97377	Document:	123303
Name:	Dubois, Noah			
Received:	Oct,04 2022 12:35:54			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

NPOAG guidance is critical to the safety and economic stability of the air tour industry while balancing the needs of the environment, tribal interests, the NPS, and the FAA. Excluding NPOAG in the ATMP process is negligent and violates congressional intent.

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Aerial tourism at Mt. Rushmore dates back to the 1960s. The economic impact these plans will have on the existing air tour companies threatens to shut down businesses that have been operating safely and responsibly for the past 30 years. This impact has reverberating consequences for the local and state economy, both of which are required elements of consideration and have been ignored.

Aerial tourism provides significant workforce development opportunities that support other sectors of the vertical lift industry to include firefighting and emergency medical services. The elimination of this workforce pool would exacerbate current pilot shortages and have impacts well beyond the limited footprint of the Mt Rushmore National Memorial.

The proposed options suggest flight allocation numbers that do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change, and NPS should in good faith respect that dynamic, as visitors alter their destinations and activities according to those trends.

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By further restricting an already very limited number of allowable air tours, we are reducing the most environmentally responsible access to Mt. Rushmore, which is in opposition to the very goals stated by the NPS in the Public Scoping Documents. Through strict altitude and route requirements to mitigate noise just to name a few efforts air-tour operators are continually working to ensure they are responsible stewards of the environment.

Currently, there are no restrictions or mitigation efforts for other vehicles operating inside the boundaries of Mt. Rushmore. For example, throughout the summer months, heavy motorcycle traffic at the memorial produces far more impact than aerial tourism. A study was completed by the Town of Keystone, adjacent to the memorial that clearly shows this to be the case.

For individuals and groups with disabilities, aerial tourism provides the access promised in the mission of the NPS. The Memorial should be available for all visitors to enjoy. Limiting flights within the memorial boundary unfairly limits the elderly, very young, handicapped, and others who wish to

experience the memorial. Limiting flights over the Memorial restricts access for those who might not have the time, resources, or physical ability to see the memorial any other way.

The NPS cannot independently drive the ATMP process behind closed doors. I strongly urge you to consult with the stakeholders, operators and NPOAG on the further development of the ATMPs to collaboratively address the concerns as an alternative to the current flawed approach.

As a future helicopter tour pilot, these jobs are extremely important to my success in the field. These rules and regulations would make it hard for tour companies to survive and therefore reducing my chances of a tour job on my career path. Keeping ariel tour companies alive is critical to my future career and a lot of other helicopter pilots.

Correspondence ID:	150	Project: 97377	Document:	123303
Name:	Busse, Andrew C			
Received:	Oct,04 2022 12:38:45			
Correspondence Type:	Web Form			

Correspondence: It cannot be understated; the area has a helicopter problem. This is a problem in terms of safety and noise. I have provided numerous emails and letters over the past 7 years to the FAA and NPS regarding this issue. I have personally done everything possible to help both government entities resolve these issues.

As for the ATMP comments: Please refer to the email I sent the NPS and FAA officials on 5/19/2020 outlining a balanced approach to the Air Tour Management Plan. It specifically laid out a proposed route that was .52 nm away from SD HWY 244 at an elevation of 6,000' MSL/1364' AGL 137 degrees southeast of the Visitor Center. This route was produced to maximize safety, consolidate noise along the roadway, and balance out viewing opportunities.

It significantly reduced the decibels below the 52 dBA threshold for 95% of Park visitors, climbers, and hikers.

I also detailed the need to reduce the number of helicopters in the air at any given time to 2 per operator, stagger take off times by 10 mins, and increase the shortest duration of flights offered to increase time between noise exposures.

It is also surprisingly notable the absence of any detailed plan to address competitive bidding to ensure competition in the provision of commercial air tour operations over the park/tribal land as explicitly stated in 49 U.S.C. § 40128(a)(2)(B):

The Administrator, in cooperation with the Director, shall develop an open competitive process for evaluating proposals from persons interested in providing commercial air tour operations over the park. In making a selection from among various proposals submitted, the Administrator, in cooperation with the Director, shall consider relevant factors, including--

- (i) the safety record of the person submitting the proposal or pilots employed by the person;
- (ii) any quiet aircraft technology proposed to be used by the person submitting the proposal;
- (iii) the experience of the person submitting the proposal with commercial air tour operations over other national parks or scenic areas;
- (iv) the financial capability of the person submitting the proposal;
- (v) any training programs for pilots provided by the person submitting the proposal; and
- (vi) responsiveness of the person submitting the proposal to any relevant criteria developed by the National Park Service for the affected park.

This need for competition and competitive bidding to prevent a monopoly language is also reiterated again in 14 CFR 136.41(c):

New entrant operators. The Administrator, in cooperation with the Director, may grant interim operating authority under this paragraph (c) to an air tour operator for a national park or tribal lands for which that operator is a new entrant air tour operator if the Administrator determines the authority is necessary to ensure competition in the provision of commercial air tour operations over the park or tribal lands.

The intent of the 106th Congress was not to monopolize our National Parks but to protect them. Currently, these draft ATMPs will only solidify the monopoly held by a select few operators who were allegedly operating when the National Parks Air Tour Management Act of 2000 was passed on 4/5/2000; over twenty-one years ago. It was not Congress's intent to hand only those self-proclaimed operators the permanent keys to the doors of one of our Nation's greatest treasures and with it a valuable right to be bought and sold, it was to reign in the industry and hold operators accountable to preserve our treasured resource.

Again, this notion is reiterated by the FAA's Final Ruling on IOAs by Deputy Chief Counsel James W. Whitlow in the Federal Register/Vol. 72, No. 29:

Given the specificity of the IOA authority and the limitations placed on that authority, FAA has concluded that Congress did not intend for the operators to possess it as a valuable right to be bought and sold. IOA was designed as a temporary solution to allow operators already conducting air tours at the time of the enactment of the Act to continue to operate pending completion of the ATMP, or new entrants to begin operation to ensure competition.

If this is the case, why is it that when BHAA was purchased last year for over \$7,000,000.00 with less than \$1,000,000.00 of physical assets and no real property; were they allowed to continue operations in MRNM uninterrupted? Why did they pay an extra \$6,000,000.00 above physical asset evaluation; especially when normal helicopter tour company evaluations are 4-5 times EBITA? What was sold were IOAs in direct violation of the Federal Regulations and the FAA ruling.

As the FAA also states, "the operation specification authorizing IOA, ATMP, or VA is not a property interest of the certificate holder and may not be purchased or sold between certificate holders or operators. Rather, it is an operating privilege that can be modified or revoked by the FAA".

In summary, if the ATMPs do not specifically address this issue in detail, we can presume the timeline for amendment could prolong these monopolies for another 21 years. The public will not be granted the ability to freely choose amongst operators for reasons of safety and financial feasibility as set forth in the provision of commercial air tour operations over the Parks as mentioned in 49 USC 40128, Title 14 CFR Part 136, Mr. Whitlow's findings in the Federal Register Vol. 72/No. 29, FAA Order 8900.1, FAA N8900.312 and FAA AC 136-1.

Failure to include a detailed plan for competitive bidding in the ATMP will effectively monopolize our National Parks for the foreseeable future and in doing so, we have completely violated the interests of the American people and the intent of the 106th Congress.

It would be my recommendation, to include a detailed competitive bidding process for flights into our National Parks in every ATMP to prevent a monopoly as stated in the plain law and not an amendment as proposed. Please understand it has been over 21 years of the joint effort of the NPS and FAA to develop these draft ATMPs that range from 14 to 15 pages long per Park/Monument. An amendment, could trigger a need for N.E.P.A studies and a possible EIS and further prolong a monopoly indefinitely, if one exists.

Lastly, please reconsider our previous recommendations for routes, altitudes and reduction in the number of aircraft in air.

Respectfully,

Andrew Busse

Correspondence ID:	151	Project: 97377	Document:	123303
Name:	Gurley, Kevin			
Received:	Oct,04 2022 12:56:48			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

NPOAG guidance is critical to the safety and economic stability of the air tour industry while balancing the needs of the environment, tribal interests, the NPS, and the FAA. Excluding NPOAG in the ATMP process is negligent and violates congressional intent.

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Aerial tourism at Mt. Rushmore dates back to the 1960s. The economic impact these plans will have on the existing air tour companies threatens to shut down businesses that have been operating safely and responsibly for the past 30 years. This impact has reverberating consequences for the local and state economy, both of which are required elements of consideration and have been ignored.

Aerial tourism provides significant workforce development opportunities that support other sectors of the vertical lift industry to include firefighting and emergency medical services. The elimination of this workforce pool would exacerbate current pilot shortages and have impacts well beyond the limited footprint of the Mt Rushmore National Memorial.

The proposed options suggest flight allocation numbers that do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change, and NPS should in good faith respect that dynamic, as visitors alter their destinations and activities according to those trends.

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By further restricting an already very limited number of allowable air tours, we are reducing the most environmentally responsible access to Mt. Rushmore, which is in opposition to the very goals stated by the NPS in the Public Scoping Documents. Through strict altitude and route requirements to mitigate

noise just to name a few efforts air-tour operators are continually working to ensure they are responsible stewards of the environment.

Currently, there are no restrictions or mitigation efforts for other vehicles operating inside the boundaries of Mt. Rushmore. For example, throughout the summer months, heavy motorcycle traffic at the memorial produces far more impact than aerial tourism. A study was completed by the Town of Keystone, adjacent to the memorial that clearly shows this to be the case.

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The NPS cannot independently drive the ATMP process behind closed doors. I strongly urge you to consult with the stakeholders, operators and NPOAG on the further development of the ATMPs to collaboratively address the concerns as an alternative to the current flawed approach.

Thank you,

Kevin Gurley

Correspondence ID:	152	Project: 97377	Document:	123303
Name:	Switzer, Benjamin			
Received:	Oct,04 2022 12:56:49			
Correspondence Type:	Web Form			

Correspondence: First of all, Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I believe that the National parks of the united states and around the world are treasures that should be enjoyed by all. There are many ways to enjoy the parks and aerial helicopter tours are a great way to see a large part of the park at once. I have personally taken many helicopter tours around and in national parks around the country. With this experience, I gained a better idea of how to navigate and enjoy the national park. As well as many other advantages. Every single one of these tours holds a special place in my heart and I recommend them to anyone visiting the national parks.

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

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Correspondence ID:	153	Project: 97377	Document:	123303
Name:	Kopitnik, Thomas			
Received:	Oct,04 2022 12:59:14			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and

recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

NPOAG guidance is critical to the safety and economic stability of the air tour industry while balancing the needs of the environment, tribal interests, the NPS, and the FAA. Excluding NPOAG in the ATMP process is negligent and violates congressional intent.

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Aerial tourism at Mt. Rushmore dates back to the 1960s. The economic impact these plans will have on the existing air tour companies threatens to shut down businesses that have been operating safely and responsibly for the past 30 years. This impact has reverberating consequences for the local and state economy, both of which are required elements of consideration and have been ignored.

Aerial tourism provides significant workforce development opportunities that support other sectors of the vertical lift industry to include firefighting and emergency medical services. The elimination of this workforce pool would exacerbate current pilot shortages and have impacts well beyond the limited footprint of the Mt Rushmore National Memorial.

The proposed options suggest flight allocation numbers that do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change, and NPS should in good faith respect that dynamic, as visitors alter their destinations and activities according to those trends.

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By further restricting an already very limited number of allowable air tours, we are reducing the most environmentally responsible access to Mt. Rushmore, which is in opposition to the very goals stated by the NPS in the Public Scoping Documents. Through strict altitude and route requirements to mitigate noise just to name a few efforts air-tour operators are continually working to ensure they are responsible stewards of the environment.

Currently, there are no restrictions or mitigation efforts for other vehicles operating inside the boundaries of Mt. Rushmore. For example, throughout the summer months, heavy motorcycle traffic at the memorial produces far more impact than aerial tourism. A study was completed by the Town of Keystone, adjacent to the memorial that clearly shows this to be the case.

For individuals and groups with disabilities, aerial tourism provides the access promised in the mission of the NPS. The Memorial should be available for all visitors to enjoy. Limiting flights within the memorial boundary unfairly limits the elderly, very young, handicapped, and others who wish to experience the memorial. Limiting flights over the Memorial restricts access for those who might not have the time, resources, or physical ability to see the memorial any other way.

The NPS cannot independently drive the ATMP process behind closed doors. I strongly urge you to consult with the stakeholders, operators and NPOAG on the further development of the ATMPs to collaboratively address the concerns as an alternative to the current flawed approach.

Correspondence ID:	154	Project: 97377	Document:	123303
Name:	L, Alison			
Received:	Oct,04 2022 13:17:17			
Correspondence Type:	Web Form			

Correspondence: The ever increasing number of helicopter tours flying daily through Custer State Park, Black Elk Wilderness and Mt Rushmore memorial area are a complete and total nuisance. There is msp way they are flying above 2000 feet when they are ripping down into drainages. This is not safe and incredibly unfair to all of the hikers, climbers, fishers and others out trying to enjoy the wilderness when a loud obnoxious helicopter is flying down above you all day. It's had completely disrupted out once quiet and serene areas. Please please limit the number of daily excursions and where they can go. It's ruining the outdoors for the locals. Thank you.

Correspondence ID:	155	Project: 97377	Document:	123303
Name:	Rendon, Marcus			
Received:	Oct,04 2022 13:18:53			
Correspondence Type:	Web Form			

Correspondence: I wholly support the following comment and hope it is taken into consideration.

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Correspondence ID:	156	Project: 97377	Document:	123303
Name:	Redden, Darren C			
Received:	Oct,04 2022 13:22:58			
Correspondence Type:	Web Form			

Correspondence: The sound of a helicopter all day long in the Black Hills is not the experience people are going for out there. People can see the monument by foot. Leave the chopper at home

Correspondence ID:	157	Project: 97377	Document:	123303
Name:	Maisey-Ireland, Mary			
Received:	Oct,04 2022 13:43:15			
Correspondence Type:	Web Form			

Correspondence: The number of helicopter tour providers and the frequency of flights has increased exponentially over the last few years.

While I appreciate the excitement and the beauty of seeing Mt. Rushmore from the sky, it is disruptive for the vast majority of visitors to the memorial and in the surrounding areas.

I lead outdoor weddings in many places that are in the flight patterns of the Mt Rushmore-bound helicopter tours and often have to wait for them (and their noise) to pass before continuing the ceremony.

We are avid hikers in the same areas. The frequency of flights and the noise levels definitely diminish our enjoyment of being in nature.

Part of what makes Mt. Rushmore so amazing is that it's tucked into this beautiful forest. It feels like being in nature, but the helicopters are starting to make it feel like being in Washington DC. And not everyone wants a helicopter in their photos of Mt. Rushmore.

Please respect the experiences of others -- the majority of whom have their feet on the ground.

Mary Maisey-Ireland

Correspondence ID:	158	Project: 97377	Document:	123303
Name:	Rafferty, Mark C			
Received:	Oct,04 2022 13:58:12			
Correspondence Type:	Web Form			

Correspondence: I think the helicopter tours are very distracting from the beautiful scenery that is the mt Rushmore recreational areas, especially when rock climbing. There has been multiple scenarios where I can't hear my climbing partner yelling down at me to tell me if I should take them off belay or take in rope for safety. They fly very low to the point where I can see facial expressions and hat logos inside the helicopter. I understand they are trying to give a great experience to their paying customer, but it's at the expense of other user groups quality of recreation. I hope that they have more regulation on flight patterns or to just simply be not allowed to fly in the memorial at all.

Correspondence ID:	159	Project: 97377	Document:	123303
Name:	Karpel, Alan			
Received:	Oct,04 2022 13:58:31			
Correspondence Type:	Web Form			

Correspondence: I am opposed to any helicopter tour flying over the monument. It is disturbing to my experience.

Correspondence ID:	160	Project: 97377	Document:	123303
Name:	LaHood-Burns, Murray			
Received:	Oct,04 2022 14:21:41			
Correspondence Type:	Web Form			

Correspondence: I support Alternative 2 of no helicopter tours. The constant noise pollution of helicopters creates a public nuisance for the millions of people visiting Rushmore and the surrounding hills every year. A relatively small number of people should not have the right to have such an outsized negative impact on visitors and locals who come here to enjoy the beautiful sights and sounds of the Black Hills, and participate in the growing outdoor recreational opportunities that support almost every business here.

Correspondence ID:	161	Project: 97377	Document:	123303
Name:	Groves, Daniel			
Received:	Oct,04 2022 14:22:10			

Correspondence Type: Web Form

Correspondence: The public should be able to experience the park without the disruption of a low-flying helicopter every few minutes. At the very least, a minimum height above ground for air tours would be helpful.

Correspondence ID: 162 Project: 97377 Document: 123303
Name: Parr, James A
Received: Oct,04 2022 14:34:08
Correspondence Type: Web Form

Correspondence: Helicopters have ruined the wilderness experience that can be found in and around the Mount Rushmore Memorial. Not only do they create a lot of noise and disturb the natural habit of the Black Hills but they also create a dangerous barrier in communication when climbing. This can create extremely dangerous situations for climbers. Being able to hear each other especially on the wandering and meandering routes in the hills where sometimes you cannot see your partner and are only able to communicate through voice connection is vital to enjoying the sport safely.

Correspondence ID: 163 Project: 97377 Document: 123303
Name: Hinn, Terry
Received: Oct,04 2022 14:37:55
Correspondence Type: Web Form

Correspondence: I am a runner, hiker, and climber. The helicopters take away some of the pristine beauty and add sound pollution. I have also seen them hover close to the spires as people were climbing and was on Harney Peak when one flew below the 500ft above occupied ground FAA regulation.

Correspondence ID: 164 Project: 97377 Document: 123303
Name: Hinn, Peyton A
Received: Oct,04 2022 14:55:03
Correspondence Type: Web Form

Correspondence: Hi, I am commenting because I would love to see helicopters stop flying in Mtn Rushmore and Custer state park. As someone who grew up in the area, it makes me sad when I'm trying to enjoy the environment and the wilderness. The helicopters fly so low, it's all I can hear, which can make climbing dangerous. It's also polluting the sounds of nature when I'm hiking or even just trying to listen to the creek or birds. I find winter so much more enjoyable because of the absence of helicopters in the sky.

Correspondence ID: 165 Project: 97377 Document: 123303
Name: ,
Received: Oct,04 2022 14:55:14
Correspondence Type: Web Form

Correspondence: The noise level from helicopters is annoying, troublesome and disturbing to wildlife and polluting as well. Is there some sort of restriction we can put on helicopter tours? I think limiting the number of yours a company can give per day and limiting how many more helicopter tour companies can start up would be helpful. Thank you for considering. The noise pollution is frustrating: I don't hear birds sing until up to 5 minutes after a helicopter passes, just in time for another one to fly by.

Correspondence ID:	166	Project: 97377	Document:	123303
Name:	Eisenbeisz, Hadly C			
Received:	Oct,04 2022 15:03:01			
Correspondence Type:	Web Form			

Correspondence: To Whom It May Concern,

It has come to my attention that Mt Rushmore National Park (MRNP) is seeking input from the community regarding the commercial tour helicopters that frequently fly over the park and adjacent Black Elk Wilderness area/Custer State Park (CSP). My name is Dr. Hadly Carson Eisenbeisz and I am originally from Pierre, SD, but have lived in Rapid City the past 2 years while finishing medical school. I also frequently visited the hills and MRNP/CSP specifically before living in the area to pursue my various hobbies of rock climbing, mountain and road biking, fishing, and hiking. Ever since I can remember, my outdoor experiences in CSP and the Keystone area have been tainted by the frequent flyovers of private helicopter tours, but recently it seems there has been exponential growth of the tours with more and more helicopters constantly buzzing the natural areas. As I typed out this email now from the Cathedral Spires area at 11 am, I can hear at least 3 different helicopters and can see 1 below my eye level near the parking lot for the Cathedral Spires trailhead. I cannot understate how disappointed I am by the complete disrespect these helicopter operators have for the natural environment around MRNP and CSP. I have never visited any other state or national parks which allow or tolerate such motorized perturbation of the wilderness. I have brought countless friends and family members out to the park and without fail they have all commented on how disturbing and distracting these helicopters are. I fully support clearing the MRNP, CSP and Black Elk Wilderness airspace of these helicopters and hope there is something the National Park or state government can do to enforce such common sense regulation. There are better ways to experience the park and I don't believe it is justified for the entitled few who can afford these helicopter rides to ruin the experience for everyone else (especially those paying for a park pass on the ground), not to mention constantly disrupt animals which may be living or migrating through the area. If I cannot ride a mountain bike or fly a drone in Black Elk Wilderness, I certainly shouldn't have to listen to the constant whir of helicopters just 100 ft above the ground. Please let me know if there is anything else I can do to support the park in its efforts or if there is a better place to put forth this complaint.

I support the most aggressive limitations possible for these helicopters which by my understanding would be Alternative 2 to the Mount Rushmore National Memorial Air Tour Management Plan (ATMP) Environmental Assessment (EA). Thank you, and have a good day.

H. Carson Eisenbeisz, MD

Correspondence ID:	167	Project: 97377	Document:	123303
Name:	Groseth, Tate			
Received:	Oct,04 2022 15:10:02			
Correspondence Type:	Web Form			

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For individuals and groups with disabilities, aerial tourism provides the access promised in the mission of the NPS. The Memorial should be available for all visitors to enjoy. Limiting flights within the memorial boundary unfairly limits the elderly, very young, handicapped, and others who wish to experience the memorial. Limiting flights over the Memorial restricts access for those who might not have the time, resources, or physical ability to see the memorial any other way.

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Correspondence ID:	168	Project: 97377	Document:	123303
Name:	johnston, ward			
Received:	Oct,04 2022 15:15:47			
Correspondence Type:	Web Form			
Correspondence:	The Black Hills is a still al wild place where even though tourists may be on the highway's, once you leave the crowds, the quiet of the hills is all around. Helicopters are constantly interrupting this quiet and continue to subtract from the beauty of the hills. I think it should be law that just as bikes aren't allowed in the black elk wilderness, helicopters should not be able to occupy the air above. All of the most popular sites should get rid of this air traffic and allow the plants, animals, and humans occupying space in the hills some peace and quiet.			
Correspondence ID:	169	Project: 97377	Document:	123303
Name:	Cooper, Anthony J			
Received:	Oct,04 2022 15:18:13			
Correspondence Type:	Web Form			
Correspondence:	Sir/Ma'am, Thank you for taking the time to read this. Please consider reducing and/or eliminating helicopter tours in the Mt Rushmore area. The tours severely reduce the ability of those on foot to enjoy the monument and the surrounding area. Considering that there is already a guided walking tour, there are no shortage of options to enjoy the space. Further, acknowledging that the area is sacred to the Oglala Sioux and other indigenous persons, eliminating helicopter tours goes some way towards acknowledging that, by reducing the noise pollution and allowing everyone to enjoy the space in the quiet natural way it was intended to be enjoyed. Thank you for considering this.			
Correspondence ID:	170	Project: 97377	Document:	123303
Name:	, Austin			
Received:	Oct,04 2022 15:18:31			
Correspondence Type:	Web Form			
Correspondence:	I am NOT in favor of limiting or restricting any flight patterns pertaining to anyone or any aircraft.			
Correspondence ID:	171	Project: 97377	Document:	123303
Name:	Samuelsen, Jason			
Received:	Oct,04 2022 15:30:28			
Correspondence Type:	Web Form			
Correspondence:	Please help limit the number of helicopter tours in the black hills. It is very annoying and defeats the purpose of nature. Thank you,			
Correspondence ID:	172	Project: 97377	Document:	123303
Name:	Schwarzbach, Daniel			
Received:	Oct,04 2022 15:31:25			
Correspondence Type:	Web Form			

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Correspondence ID:	173	Project: 97377	Document:	123303
Name:	Scheirbeck, Susan J			
Received:	Oct,04 2022 15:47:21			
Correspondence Type:	Web Form			

Correspondence: Greetings,

Thick files should exist in your records regarding the problems of helicopters tours in the late 80's/early 90's. Helicopters were regularly flying below the many summit spires at Rushmore, in Custer State Park, and in the Cathedral Spires - admittedly to "get close to climbers for their passengers";

Sue Shroeder from MN had one hover next to her as she was leading pitch two on some hard route near Garfield goes to Washington. Actually overing above the highway!! It was so close she could see him laughing and the letter on his hat!!

Several Sylvan Rocks guides experienced helicopters flying far too close and hovering as well.. several clients complained to you that their classes were interrupted because the guides couldn't speak and they couldn't hear them - certainly a safety issue!

We had a huge letter writing effort and people sent photos (before cell phones or we would have had many more). Hikers also regularly commented while shopping at Granite Sports that the helicopters really ruined the wilderness experience.

I fully agree with the Black Hills Climbing Coalition that they should not be allowed within the monument. I would also say not in CSP or Black Elk Wilderness Area as well. People come from far and wide to enjoy the wilderness - they don't want the awful sound.

Thank you for all you do to protect our wild places. I look forward to hearing the outcome. There is plenty of forest service land to fly over.

Susan Scheirbeck

Founder - Sylvan Rocks Guide Service and Granite Sports

Correspondence ID:	174	Project: 97377	Document:	123303
Name:	Mordfin, Matthew			
Received:	Oct,04 2022 16:05:37			
Correspondence Type:	Web Form			

Correspondence: I spend a lot of my free time rock climbing and hiking in and around Mt Rushmore. The constant barrage of helicopters are the single greatest factor that ruin my outdoor experience in the area. They are loud, constant, and annoying. If it is possible I would like to see them stop all together.

Correspondence ID:	175	Project: 97377	Document:	123303
Name:	Vitale, Julia			

Received:

Oct,04 2022 16:14:28

Correspondence Type:

Web Form

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For individuals and groups with disabilities, aerial tourism provides the access promised in the mission of the NPS. The Memorial should be available for all visitors to enjoy. Limiting flights within the memorial boundary unfairly limits the elderly, very young, handicapped, and others who wish to experience the memorial. Limiting flights over the Memorial restricts access for those who might not have the time, resources, or physical ability to see the memorial any other way.

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Correspondence ID:	176	Project: 97377	Document:	123303
Name:	Woyczesczyk, Helene M			
Received:	Oct,04 2022 16:42:12			
Correspondence Type:	Web Form			

Correspondence: Despite not being a local, I consider the Black Hills to be a home away from home. Last year alone, I spent nearly 2 months in the Custer/Rapid City area. While the Hills serve as a place of great solace to me, the constant air traffic in the form of helicopters is a frequent disrupter to the calm the land provides. It feels as if there is no area "safe" from the noise helicopters produce.

From a customer satisfaction standpoint, it seems illogical to support the enjoyment of small parties in helicopters at the expense of hundreds of people quietly trying to enjoy the park.

There are so many better ways to enjoy this historic and beautiful place. To those who may argue that helicopter tours make viewing the Hills more accessible to folks of different physical abilities, I say there are other forms of alternative transportation far less disruptive that could be utilized (ie: trail wheelchairs, hot air balloons).

Thank you for opening up this discussion to the public.

Correspondence ID:	177	Project: 97377	Document:	123303
Name:	Mercy, Michael M			
Received:	Oct,04 2022 16:56:18			
Correspondence Type:	Web Form			

Correspondence: I've considered starting a petition to get the helicockers outta keystone. Imagine grilling with friends in your fenced back yard and you have to constantly pause conversation due to the helicockers flying extremely low ...all day long....all summer long. I feel like they should at least have to be set up outside city limits and not be able to fly directly over cities and houses. I feel like they should be limited to traveling above existing roadways so that their immense noise pollution is at least with the traffic boundaries as they are traffic. Imagine hiking 3 hours with your friend, deep into the Black Hills to get some peace and quiet. Only to find out that your camp will constantly be buzzed by helicockers, all day, all summer, by fatasses with \$50. You can already see the hills by hiking, biking, horse backing, and Lord knows utvs. Do we really need to make the most serene places, the most accessable? We used to not climb at wrinkled Rock during the rally and now it's like a rally in the air all summer. What about noise pollution in the norbeck wildlife preserve? Isn't there something in there about how wildlife, not responding well to helicockers? Hermosa, Hot springs, Piedmont. These are further areas surrounding the hills that could offer a scenic tour of the hills. No you wouldn't be access black elk, crazy horse, and Rushmore in the face within 5minutes from the air but should you be able to? it would be more expensive and profit margins would probably be less and less people flying bc of that but isn't that what

should happen? I mean at least the rally feed the whole black hills, helicoickers only feed a few. Shouldn't we try to make the black hills more scared, instead of less?

Correspondence ID:	178	Project: 97377	Document:	123303
Name:	Bybee, Joshua K			
Received:	Oct,04 2022 17:04:20			
Correspondence Type:	Web Form			

Correspondence: I request that there be no helicopters flown within the national memorial boundary. I can not even count the amount of times I have not been able to hear my climbing partner because of the helicopters. Not only can this be dangerous for my partner and I but also dangerous for those passing by on the ground who may not hear a warning about potential rock fall.

Correspondence ID:	179	Project: 97377	Document:	123303
Name:	Chastain, James M			
Received:	Oct,04 2022 17:12:34			
Correspondence Type:	Web Form			

Correspondence: I am in the outdoors quite a bit including the boundaries of the Mount Rushmore National Monument. I am a climber and a hiker and the noise from helicopters is very distracting. It also takes away from the experience of being in the outdoors. Especially when climbing a more difficult route the noise of a helicopter flying overhead can be very distracting.

There needs to be a minimum flight altitude that is higher than what it currently is. This would reduce the amount of noise for hikers, climbers and other people in the outdoors. This would also reduce the amount of noise that visitors at the monument would have to endure.

I know this is beyond the scope but I would like to see a higher minimum altitude for all helicopter flights above not only Mount Rushmore national Monument but the Black Elk Wilderness Area as well.

Correspondence ID:	180	Project: 97377	Document:	123303
Name:	Smith, Sara			
Received:	Oct,04 2022 17:19:42			
Correspondence Type:	Web Form			

Correspondence: No more copters :(

Correspondence ID:	181	Project: 97377	Document:	123303
Name:	Hansen, Eric			
Received:	Oct,04 2022 17:49:10			
Correspondence Type:	Web Form			

Correspondence: Hello all, I am a long-term user of the Black Hills and I'm getting tired of the helicopter noise ruining my backcountry experience. At times when out with my family we have to wait every 3 to 5 minutes for a helicopter to pass by before we can continue enjoying our outdoor experience. I'm also a rock climber and at times the helicopter noise makes it dangerous when I cannot communicate with my partner on the rock. I have experienced low-flying helicopters flying level with me when I'm high in the rock. Please stop this pollution!!

Thank you!

Correspondence ID:	182	Project: 97377	Document:	123303
Name:	Tolman, Tom E			
Received:	Oct,04 2022 18:13:28			
Correspondence Type:	Web Form			

Correspondence: The helicopters are getting ridiculous. I understand tourism drives our economy, but there is no more peace and quiet in the central hills. You can be in the heart of the Black Elk Wilderness area and it sounds like a landing zone during the Vietnam War. Pardon the hyperbole, but when I'm standing on top of Spire 4 and get passed by more helicopters than there are pitches on the route it's just lame.

Communicating while on routes is tough when all the helicopters are flying around. You're trying to yell to let your partner know what is going on and the message has to be shouted eight times. The Black Hills used to be a quiet place to enjoy, now it's a gaudy tourist trap as bad as Pigeon Forge, TN. As a local who has lived here for 31 years, it's a bummer to see how it has sold out to make a buck, rather than making a community around an awesome resource. It's doubtful you guys will change your policy, so just remember how lame you're making the hills before you go to bed every night. Ohh and your monument full of racist dudes ruined a perfectly good mountain.

Correspondence ID:	183	Project: 97377	Document:	123303
Name:	Oxner, Payton D			
Received:	Oct,04 2022 19:32:24			
Correspondence Type:	Web Form			

Correspondence: As a local resident of the area, employee of the area, and avid climber. I believe the helicopter use have gotten out of hand in the area. I worked at Rushmore Tramway adventures for 3 1/2 years which is within sight of the monument, the loud buzz of helicopters is constant and happens too often to count. Not only are they high in number, they fly so low it seems to take away from the natural beauty. As a climber it definitely takes away from the experience as well. It has been sad to see this overtake in recent years but it brings me a lot of hope to see attention being given to this topic. I feel restrictions on the number of flights and altitude of flights would make a vast improvement and bring some lost beauty back to the monument and surrounding area.

Correspondence ID:	184	Project: 97377	Document:	123303
Name:	Matzen, Gage			
Received:	Oct,04 2022 19:35:46			
Correspondence Type:	Web Form			

Correspondence: Alternative 2 - no flying in the planning area.

Correspondence ID:	185	Project: 97377	Document:	123303
Name:	Miller, Jake			
Received:	Oct,04 2022 19:40:04			
Correspondence Type:	Web Form			

Correspondence: There needs to be serious regulations of the helicopter tours it's so annoying to be out for a hike in the black hills and hear a helicopter coming flying by it's a distraction to my mental state and physical doing I don't understand the need to have a helicopter fly by every minute of the day it's unfair to our outdoor recreation all im saying is limit the use of helicopters in the hills!

Correspondence ID:	186	Project: 97377	Document:	123303
Name:	Trupe, Garret			
Received:	Oct,04 2022 20:30:08			
Correspondence Type:	Web Form			
Correspondence:	I was fortunate enough to draw a once in a lifetime mountain goat tag in South Dakota. During my 12 days of hunting/scouting up in black elk wilderness, I counted at least 20 helicopters daily. It seemed excessive to have that many tours flying through such a breath taking area so frequently.			
Correspondence ID:	187	Project: 97377	Document:	123303
Name:	Paisley, Cam			
Received:	Oct,04 2022 20:46:25			
Correspondence Type:	Web Form			
Correspondence:	I have been out climbing a multitude of times in the southern hills and see these helicopters quite frequently. Not only do I feel they fly to low and can be quite loud and disruptive. But I have seen them come quite close to some rock formations in the cathedral spires area and the black elk wilderness.			
Correspondence ID:	188	Project: 97377	Document:	123303
Name:	Spahni, Anthony			
Received:	Oct,04 2022 20:49:42			
Correspondence Type:	Web Form			
Correspondence:	I'm a Helicopter student/pilot at the University of North Dakota and all I've gotta say is this;			
	If y'all go through with this, you're only going to create more job issues for pilots like me who already struggle to find jobs as it is. You'd be killing jobs, killing my dreams (mine and tourists), killing good career opportunities, and you'd be killing the American spirit of having freedom to do as we Americans please. The more you take away from us, the more and more people turn away and distrust government like you.			
Correspondence ID:	189	Project: 97377	Document:	123303
Name:	Schelske, Steven D			
Received:	Oct,04 2022 21:02:48			
Correspondence Type:	Web Form			
Correspondence:	I have hunted deer and elk for over 25 years in the areas that helicopters fly frequently today and the numbers of deer and elk in those areas have drastically been reduced and some places no longer have deer and elk, which I believe is due to the constant low flying helicopters driving the wildlife away from their natural habitat.			
Correspondence ID:	190	Project: 97377	Document:	123303
Name:	,			
Received:	Oct,04 2022 21:13:10			
Correspondence Type:	Web Form			
Correspondence:	I recreate in the wilderness for peace and quiet. Please ban helicopters!			

Correspondence ID:	191	Project: 97377	Document:	123303
Name:	Frein, Lindsey			
Received:	Oct,04 2022 22:12:28			
Correspondence Type:	Web Form			

Correspondence: To the NPS and USFS, SD State Parks and Custer County officials, local residents of Custer, and all those who enjoy the privilege of visiting this incredible place,

I write this comment in the hope that you will continue to protect this sacred place. And I say sacred loosely, it is both sacred to the local who has lived here for generations as well as the tourist stepping foot on a 10 minute hike for the first time. Sacred to the mountain goats and sacred to the little bugs. I believe anyone who spends time here has seen the magic of the hills. I want everyone to have an equal opportunity to enjoy this magic, not just today but for generations to come. And I want them to be able to see it in a pure, unabashed, and wild way. This wild is the sound of birds in the distance, the little mammals snickering by, the sightings of mountain goats teaching their kids to climb. And a helicopter flying by ruins all of these magical moments. Helicopters are incredibly loud and scare away tremendous amounts of wildlife. Your chances of seeing buffalo, mountain goats, and more are drastically reduced when a giant loud flying helicopter is overhead. It is possible that there are nesting falcons being disturbed by such aircrafts too.

Helicopters could threaten rock climbers if they startle them in a dangerous situation. They look ugly in the sky for those tourists who want beautiful views of spires in their hike or photo. Helicopters have so much ground to fly over already, I hope you please try to limit them. Ideally they are prohibited to give tours in most areas, but even limiting them will increase people's true connection to nature so much! The Black Hills are incredibly accessible already via car and foot, we do not need helicopters to see the views. Sylvan Rocks climbing school can offer the up close and special view of being UP in the rocks, and is a much more meaningful experience too. I hope these ideas help you create a sustainable management plan for the future that focuses on keeping nature wild and peaceful to all.

Correspondence ID:	192	Project: 97377	Document:	123303
Name:	Muller, Lindsay M			
Received:	Oct,04 2022 22:21:24			
Correspondence Type:	Web Form			

Correspondence: Hello, I'm a native to Minnesota and South Dakota. I've always loved the black hills. It's been a happy place of mine for years. Last summer I worked at Custer State Park as a Naturalist, and I regularly lead groups of students from my university out to the hills for rock climbing trips. After I graduate I plan on moving out to the area full time. Through the years, there has been one issue in particular that disturbs the peace not only in my opinion, but in the opinions of other outdoor enthusiasts in the area. The regular helicopter tours over the black hills create some pretty significant disturbance. People go out to find nature, not the sight and loud sounds of aggressive helicopters every 15 minutes. Not only is it simply unappealing. But can actually be quite dangerous for humans and wildlife alike. When rock climbing, communication with your partner at the top/bottom of a route is essential to ensure a safe climb. It is difficult enough to communicate without the sounds of the helicopters passing by. It is nearly impossible to hear your partner until after they have passed which poses some serious safety concerns. The loud noises also disturb wildlife and their usual behaviors. Those seemingly minor thing to the average tourist can have some significant impacts to our wild spaces in a negative way. As such, I would like to propose the idea of considering stricter regulations on helicopter tours in order to sleep our wild places wild and to minimize anthropogenic disturbances.

Thanks for the consideration,

-Lindsay

Correspondence ID:	193	Project: 97377	Document:	123303
Name:	,			
Received:	Oct,04 2022 22:42:34			
Correspondence Type:	Web Form			

Correspondence: Please help preserve the wilderness of the Black Hills and don't allow helicopters to fly in protected areas! Not only is this incredibly disruptive to people enjoying the "wilderness" areas, but it is also extremely harmful and disrespectful to the wildlife who call these areas home. Consider the small group of people the helicopters are benefitting vs. the massive number of people and animals who are being negatively effected by this.

Correspondence ID:	194	Project: 97377	Document:	123303
Name:	Roseland, Jane A			
Received:	Oct,05 2022 03:23:19			
Correspondence Type:	Web Form			

Correspondence: I have been an avid hiker in the Black Hills for the past 40 years. In that time, I've seen increased logging, destruction of old logging trails from an idiotic explosion of ATVs, many once pristine creeks now choked with algae resulting from cattle grazing, and the once peaceful silence interrupted by almost constant droning of helicopters. The term "wilderness " should convey the concept where there is an effort to limit man's impact in his environment. Wilderness should be a sanctuary for all living things to enjoy, while limiting negative impact!

I used to rock climb until about ten years ago and was annoyed and troubled how close the helicopters would fly by. I can only imagine how the problem has gotten worse.

ATVs need to be restricted!! In the absence of a work force to control them, they go where they want to, when they want to, leaving scars on the lands. They tend to travel in obnoxious convoys, sometimes with drunken malignant attitudes.I've seen oil and antifreeze pollution on the forest ground. Increase the price of the ATV permits and require professional guides for rentals.increase the salaries of law enforcement, so there is more oversight.

Grazing rights are archaic. Really? \$2 a cow? Let them shit all over in what used to be pristine running water. The nitrogen from their waste produces ugly algae. Increase grazing permits or get rid of them altogether. I grew up on a ranch. Cattle don't belong in the Hills.

The number of helicopters have exploded too, so there is now a near constant drone of very loud noise in what used to be a forest of quiet. What is being done to limit these?

I can't imagine wildlife flourishing under these conditions.

Correspondence ID:	195	Project: 97377	Document:	123303
Name:	Matush, Madeline			
Received:	Oct,05 2022 04:07:47			
Correspondence Type:	Web Form			

Correspondence: Helicopter tours in the Black Hills are incredibly disruptive to hikers, campers, climbers, etc. Not only is it unpleasant for people looking to enjoy the nature, I'm sure that it is damaging to wildlife in the area. The helicopters fly extremely low creating a loud and quite frankly frightening environment.

Correspondence ID:	196	Project: 97377	Document:	123303
Name:	LaRue, Joseph			
Received:	Oct,05 2022 06:21:53			
Correspondence Type:	Web Form			

Correspondence: To Whom it may concern

Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

NPOAG guidance is critical to the safety and economic stability of the air tour industry while balancing the needs of the environment, tribal interests, the NPS, and the FAA. Excluding NPOAG in the ATMP process is negligent and violates congressional intent.

The Public Scoping Documents serve to pre-shape public comment by offering options with no justification or data to support the offerings. This is a terribly flawed process, moving forward without critical NPOAG input, to produce an agency desired outcome.

Without the expertise and safety input from stakeholders, operators, and the NPOAG, serious safety concerns will arise as the NPS, with no expertise, moves, compresses, combines and shifts flight routes and altitudes that have been in place for years. The very routes in question were designed jointly between operators and the local Park Unit stakeholders.

Aerial tourism at Mt. Rushmore dates back to the 1960s. The economic impact these plans will have on the existing air tour companies threatens to shut down businesses that have been operating safely and responsibly for the past 30 years. This impact has reverberating consequences for the local and state economy, both of which are required elements of consideration and have been ignored.

Aerial tourism provides significant workforce development opportunities that support other sectors of the vertical lift industry to include firefighting and emergency medical services. The elimination of this workforce pool would exacerbate current pilot shortages and have impacts well beyond the limited footprint of the Mt Rushmore National Memorial.

The proposed options suggest flight allocation numbers that do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change, and NPS should in good faith respect that dynamic, as visitors alter their destinations and activities according to those trends.

Air tours are a vital option for many visitors providing a once-in-a-lifetime opportunity to experience natural and man-made landmarks. Visitors choosing aerial tourism represent the lowest impact to any park, recreation area, or memorial. Aerial tourism reduces impacts to parks, recreation areas and memorials. Aerial tourism provides the lowest form of impact in the park, leaving absolutely no trace, while reducing congestion and demand on park infrastructure in a significant way. For the NPS to ignore this fact is disingenuous at best.

By further restricting an already very limited number of allowable air tours, we are reducing the most environmentally responsible access to Mt. Rushmore, which is in opposition to the very goals stated by the NPS in the Public Scoping Documents. Through strict altitude and route requirements to mitigate

noise just to name a few efforts air-tour operators are continually working to ensure they are responsible stewards of the environment.

Currently, there are no restrictions or mitigation efforts for other vehicles operating inside the boundaries of Mt. Rushmore. For example, throughout the summer months, heavy motorcycle traffic at the memorial produces far more impact than aerial tourism. A study was completed by the Town of Keystone, adjacent to the memorial that clearly shows this to be the case.

For individuals and groups with disabilities, aerial tourism provides the access promised in the mission of the NPS. The Memorial should be available for all visitors to enjoy. Limiting flights within the memorial boundary unfairly limits the elderly, very young, handicapped, and others who wish to experience the memorial. Limiting flights over the Memorial restricts access for those who might not have the time, resources, or physical ability to see the memorial any other way.

The NPS cannot independently drive the ATMP process behind closed doors. I strongly urge you to consult with the stakeholders, operators and NPOAG on the further development of the ATMPs to collaboratively address the concerns as an alternative to the current flawed approach.

Correspondence ID:	197	Project: 97377	Document:	123303
Name:	Zimmerman, Mark			
Received:	Oct,05 2022 06:27:19			
Correspondence Type:	Web Form			

Correspondence: Please - enough is enough is way too much.

Choppers have ruined so much for so many.

Make them go away - choose Alternative 2 - no air tours in the planning area.

Correspondence ID:	198	Project: 97377	Document:	123303
Name:	Frey, Bobby			
Received:	Oct,05 2022 06:33:05			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial. Helicopters do less damage than people on the ground.

Air tours are a vital option for many visitors providing a once-in-a-lifetime opportunity to experience natural and man-made landmarks. Visitors choosing aerial tourism represent the lowest impact to any park, recreation area, or memorial. Aerial tourism reduces impacts to parks, recreation areas and memorials. Aerial tourism provides the lowest form of impact in the park, leaving absolutely no trace, while reducing congestion and demand on park infrastructure in a significant way. For the NPS to ignore this fact is disingenuous at best.

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Correspondence ID:	199	Project: 97377	Document:	123303
Name:	White, Griffin			
Received:	Oct,05 2022 07:27:18			
Correspondence Type:	Web Form			

Correspondence: I very much dislike helicopters flying over my favorite parts of the black hills. I think it ruins the experience with the constant noise pollution.

Correspondence ID:	200	Project: 97377	Document:	123303
Name:	Crossland, Michael			
Received:	Oct,05 2022 07:29:01			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

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Currently, there are no restrictions or mitigation efforts for other vehicles operating inside the boundaries of Mt. Rushmore. For example, throughout the summer months, heavy motorcycle traffic at the memorial produces far more impact than aerial tourism. A study was completed by the Town of Keystone, adjacent to the memorial that clearly shows this to be the case.

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Correspondence ID:	201	Project: 97377	Document:	123303
Name:	, Kari			
Received:	Oct,05 2022 07:43:44			
Correspondence Type:	Web Form			

Correspondence: My husband and I have been climbing and hiking in the Mount Rushmore area for a couple years. The constant sound of helicopters is loud and a nuisance. We're supposed to be enjoying quiet days in nature, but it's constantly interrupted and not subtly. We complain about the helicopters every time. It's gotten bad enough that we usually opt to go up to Spearfish for our outdoor activities now to avoid the noise and get some quiet. I think making the helicopter tours take different routes around the Rushmore area will bring peace and quiet back to hikers and climbers in the area so that we can fully enjoy the experience the Black Hills has to offer.

Correspondence ID:	202	Project: 97377	Document:	123303
Name:	Slichter, Jim			
Received:	Oct,05 2022 08:06:58			
Correspondence Type:	Web Form			

Correspondence: Good morning to you. I have been climbing, hiking and exploring in Mount Rushmore National Monument and the surrounding area for the past 50 years beginning when I was a

student at SDSMT in Rapid City. Now I am a full time resident living between Hill City and Keystone who still gets out to climb 2-3 times per week. In the 1970's there were multiple times when I was on top of Old Baldy and was aggressively buzzed by the helicopters flying out of Keystone. It was not uncommon to have them fly over only 50-100 feet above us to the point where I could feel the downdraft from their rotors. Today that no longer seems to be a problem as they appear to be maintaining a higher altitude on their routes. However even though the closeness of the encounters has decreased, the sheer quantity of flights has dramatically increased. It has reached a point where these flights happen multiple times each hour and really impact one's ability to enjoy the outdoors and the actual carving itself.

I appreciate that you are aware of this issue and are actively seeking public input to develop new guidelines for addressing the problem. My preference would be to eliminate all helicopter flights over the Mount Rushmore National Monument boundaries. This would provide the maximum benefit for the maximum number of visitors. If this is impossible or unfeasible to do, then I would suggest establishing a minimum flight altitude of at least 3000' and preferably 6000' above ground level. Hopefully whatever steps you do take will tremendously reduce the noise pollution over the Monument and allow visitors to enjoy their outdoor experience.

Thank you.

Correspondence ID:	203	Project: 97377	Document:	123303
Name:	Richey, Nathan			
Received:	Oct,05 2022 08:29:08			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

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Aerial tourism at Mt. Rushmore dates back to the 1960s. The economic impact these plans will have on the existing air tour companies threatens to shut down businesses that have been operating safely and responsibly for the past 30 years. This impact has reverberating consequences for the local and state economy, both of which are required elements of consideration and have been ignored.

Aerial tourism provides significant workforce development opportunities that support other sectors of the vertical lift industry to include firefighting and emergency medical services. The elimination of this

workforce pool would exacerbate current pilot shortages and have impacts well beyond the limited footprint of the Mt Rushmore National Memorial.

The proposed options suggest flight allocation numbers that do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change, and NPS should in good faith respect that dynamic, as visitors alter their destinations and activities according to those trends.

Air tours are a vital option for many visitors providing a once-in-a-lifetime opportunity to experience natural and man-made landmarks. Visitors choosing aerial tourism represent the lowest impact to any park, recreation area, or memorial. Aerial tourism reduces impacts to parks, recreation areas and memorials. Aerial tourism provides the lowest form of impact in the park, leaving absolutely no trace, while reducing congestion and demand on park infrastructure in a significant way. For the NPS to ignore this fact is disingenuous at best.

By further restricting an already very limited number of allowable air tours, we are reducing the most environmentally responsible access to Mt. Rushmore, which is in opposition to the very goals stated by the NPS in the Public Scoping Documents. Through strict altitude and route requirements to mitigate noise just to name a few efforts air-tour operators are continually working to ensure they are responsible stewards of the environment.

Currently, there are no restrictions or mitigation efforts for other vehicles operating inside the boundaries of Mt. Rushmore. For example, throughout the summer months, heavy motorcycle traffic at the memorial produces far more impact than aerial tourism. A study was completed by the Town of Keystone, adjacent to the memorial that clearly shows this to be the case.

For individuals and groups with disabilities, aerial tourism provides the access promised in the mission of the NPS. The Memorial should be available for all visitors to enjoy. Limiting flights within the memorial boundary unfairly limits the elderly, very young, handicapped, and others who wish to experience the memorial. Limiting flights over the Memorial restricts access for those who might not have the time, resources, or physical ability to see the memorial any other way.

The NPS cannot independently drive the ATMP process behind closed doors. I strongly urge you to consult with the stakeholders, operators and NPOAG on the further development of the ATMPs to collaboratively address the concerns as an alternative to the current flawed approach.

Correspondence ID:	204	Project: 97377	Document:	123303
Name:	Kertzman, Brent K			
Received:	Oct,05 2022 08:29:09			
Correspondence Type:	Web Form			

Correspondence: Greetings,

Having reviewed the entire document and alternatives I've come to a different conclusion. I have been rock climbing in the Mt Rushmore area since 1975. I've continually noticed increasing air traffic flying around and near MORU. The air traffic over the Memorial is very distracting to all visitors at MORU.

My understanding is that the NPS operates on a preservation model as opposed to a conservation model. In light of the preservation model I'm going to suggest "No Aircraft Travel" within/over Mt Rushmore National Memorial.

Sincerely,

Brent K. Kertzman

Correspondence ID:	205	Project: 97377	Document:	123303
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Name: ,
Received: Oct,05 2022 09:20:15
Correspondence Type: Web Form

Correspondence: I manage a few local businesses and am in full support of tourism in the Black Hills; however, I believe the use of helicopters for paid tours is being abused.

I am not sure which companies are responsible, but a landowner near Mt. Rushmore believes the keystone based flight pads are going beyond their legal boundaries and below legal flying level.

I have seen this occur on a daily basis during the summer months, from 9 am - 6 pm

Myself and many other residents/business owners do not support an abuse of air travel that harms wildlife and the natural acoustics of Black Elk Wilderness.

Air travel is fine under limited circumstances, but those legal boundaries appear to not be enforced at this time. Please do not allow anymore air travel as it is already beyond an acceptable level.

Please preserve what little wilderness we have left in this country.

Thank you

Correspondence ID: 206 Project: 97377 Document: 123303
Name: Martinez, Lisa G
Received: Oct,05 2022 11:04:02
Correspondence Type: Web Form

Correspondence: I would like to see the wilderness and sanctuary of the Black Hills remain that way for generations to come. The helicopter tours are loud, disruptive, and unnecessary to enjoy the beauty of this area. They hurt wildlife with sound pollution and excessive vibration, they distract from the peace of outdoors activities, and they need to be stopped in order to keep the Black Hills pristine and healthy. I've grown up here and have been outside regularly in the hills for most of my life. The past few years I've noticed a marked increase in these tours and I'm not alone in this observation. Consider putting sanctions or putting a stop to these tourism flights before they ruin the wilderness we have left.

Correspondence ID: 207 Project: 97377 Document: 123303
Name: White, Collin
Received: Oct,05 2022 11:17:26
Correspondence Type: Web Form

Correspondence: It seems highly unfair that helicopters are able to travel through the wilderness while all other motor vehicles are prohibited. These helicopters often ruin the peace and quiet of the wilderness while not contributing anything back the affected public. I believe these companies should at the very least be restricted to non-wilderness areas. There is no legitimate reason why they should be allowed in the Black Elk Wilderness.

Correspondence ID: 208 Project: 97377 Document: 123303
Name: Jensen, Kiana
Received: Oct,05 2022 11:26:39
Correspondence Type: Web Form

Correspondence: I personally, and I'm sure many others, visit the Black Hills to appreciate nature. Nothing ruins this peaceful experience like the constant helicopters passing over and disrupting the

peace. I have heard visitors in the area complaining about this as well. I am sure it is a reason many visitors don't return. There's plenty of other mountains where you won't have your experience ruined in this way. I love the hills and would love to see a compromise found to remedy this issue.

Correspondence ID:	209	Project: 97377	Document:	123303
Name:	Carmody, Sean			
Received:	Oct,05 2022 11:30:00			
Correspondence Type:	Web Form			

Correspondence: It feels like you're in fucking Vietnam when hiking/climbing anywhere near Rushmore or Black Elk. Put some regulation on this--it has gotten completely ridiculous in the warm months. Make a change so people can enjoy the outdoors FROM THE GROUND.

Correspondence ID:	210	Project: 97377	Document:	123303
Name:	Oliver, Tyler			
Received:	Oct,05 2022 11:40:38			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

NPOAG guidance is critical to the safety and economic stability of the air tour industry while balancing the needs of the environment, tribal interests, the NPS, and the FAA. Excluding NPOAG in the ATMP process is negligent and violates congressional intent.

The Public Scoping Documents serve to pre-shape public comment by offering options with no justification or data to support the offerings. This is a terribly flawed process, moving forward without critical NPOAG input, to produce an agency desired outcome.

Without the expertise and safety input from stakeholders, operators, and the NPOAG, serious safety concerns will arise as the NPS, with no expertise, moves, compresses, combines and shifts flight routes and altitudes that have been in place for years. The very routes in question were designed jointly between operators and the local Park Unit stakeholders.

Aerial tourism at Mt. Rushmore dates back to the 1960s. The economic impact these plans will have on the existing air tour companies threatens to shut down businesses that have been operating safely and responsibly for the past 30 years. This impact has reverberating consequences for the local and state economy, both of which are required elements of consideration and have been ignored.

Aerial tourism provides significant workforce development opportunities that support other sectors of the vertical lift industry to include firefighting and emergency medical services. The elimination of this workforce pool would exacerbate current pilot shortages and have impacts well beyond the limited footprint of the Mt Rushmore National Memorial.

The proposed options suggest flight allocation numbers that do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry

marketing trends change, and NPS should in good faith respect that dynamic, as visitors alter their destinations and activities according to those trends.

Air tours are a vital option for many visitors providing a once-in-a-lifetime opportunity to experience natural and man-made landmarks. Visitors choosing aerial tourism represent the lowest impact to any park, recreation area, or memorial. Aerial tourism reduces impacts to parks, recreation areas and memorials. Aerial tourism provides the lowest form of impact in the park, leaving absolutely no trace, while reducing congestion and demand on park infrastructure in a significant way. For the NPS to ignore this fact is disingenuous at best.

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Currently, there are no restrictions or mitigation efforts for other vehicles operating inside the boundaries of Mt. Rushmore. For example, throughout the summer months, heavy motorcycle traffic at the memorial produces far more impact than aerial tourism. A study was completed by the Town of Keystone, adjacent to the memorial that clearly shows this to be the case.

For individuals and groups with disabilities, aerial tourism provides the access promised in the mission of the NPS. The Memorial should be available for all visitors to enjoy. Limiting flights within the memorial boundary unfairly limits the elderly, very young, handicapped, and others who wish to experience the memorial. Limiting flights over the Memorial restricts access for those who might not have the time, resources, or physical ability to see the memorial any other way.

The NPS cannot independently drive the ATMP process behind closed doors. I strongly urge you to consult with the stakeholders, operators and NPOAG on the further development of the ATMPs to collaboratively address the concerns as an alternative to the current flawed approach.

Correspondence ID:	211	Project: 97377	Document:	123303
Name:	Anderson, Anna J			
Received:	Oct,05 2022 12:04:20			
Correspondence Type:	Web Form			
Correspondence:	Please select Alternative 2.			

Correspondence ID:	212	Project: 97377	Document:	123303
Name:	O'Hara, Michael			
Received:	Oct,05 2022 12:20:15			
Correspondence Type:	Web Form			

Correspondence: As both a natural and cultural resource, Mount Rushmore and the surrounding Black Hills and Black Elk Wilderness area are a uniquely special resource, and thus ought to be treated as such. While the views from a helicopter may be unique in their own way, the adverse affects of regular helicopter traffic in terms of disturbance of both wildlife and people who go to the Black Hills to appreciate nature bring detriment to our natural resources and to the tourism industry in South Dakota. Helicopter traffic, while perhaps difficult to eliminate entirely, must be, at the very least, kept to a bare minimum in our natural, unique, and sacred places in South Dakota.

Correspondence ID:	213	Project: 97377	Document:	123303
Name:	McCraw, Ellie			

Received:

Oct,05 2022 12:34:16

Correspondence Type:

Web Form

Correspondence: There needs to be a change with the helicopters around Mount Rushmore National Monument. It is a popular spot for hiking and climbing and with so many tours a day and with these helicopters coming so close to the monument, there is a struggle with healthy communication during hikes and climbs.

I am a both a hiker and climber, but when I am climbing and I need to speak to my belayer, or hear my climber for certain commands, I cannot with the helicopters being so close in the area. Some of these commands are very very important for the safety and lives of climbers and belayers. If I rock comes loose and I am on the ground belaying and my climber yells it out, but I can't hear? That puts my life in danger and I think the city and helicopters companies need to see that, and understand how scary it is when you have someone's life in your hands and you can't hear certain, important, commands.

1 option is to have less flights during the week peak of the day.

Another option is to still have the same amount of tours, but not fly as close to Mount Rushmore. It is big enough where you can clearly see it from 10+ miles out. I realize the sound may still carry in the wind, but it will be quieter to where it can keep climbers and hikers safer when communicating.

Thank you for taking the time to read this and consider options in changing the rules of distance and/or flight patterns for the monument and surrounding area. I appreciate you taking in the consideration of safety and content for climbers and hikers in the area.

Correspondence ID:

214 Project: 97377 Document: 123303

Name:

Whitesel, Bryan

Received:

Oct,05 2022 13:31:42

Correspondence Type:

Web Form

Correspondence: Please consider the safety of climbers recreating around Mount Rushmore and the danger helicopter tours present.

Correspondence ID:

215 Project: 97377 Document: 123303

Name:

Edelman, Stephanie

Received:

Oct,05 2022 14:29:19

Correspondence Type:

Web Form

Correspondence: Rushmore helicopters inc in particular is too close to the residential and business area in Keystone. We literally have to stop doing business with paying customers if we are doing anything in our outdoor yard (which is frequent) until they have landed. We also have rental properties for tourists to explore, experience, and stay in our beautiful area and the noise from the helicopters whose landing pad is VERY close is a negative and we receive lots of complaints.

Correspondence ID:

216 Project: 97377 Document: 123303

Name:

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Received:

Oct,05 2022 14:51:44

Correspondence Type:

Web Form

Correspondence: No more helicopters in the Black Hills!

Correspondence ID:

217 Project: 97377 Document: 123303

Name: Moses, Ali
Received: Oct,05 2022 14:56:44
Correspondence Type: Web Form

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

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Aerial tourism at Mt. Rushmore dates back to the 1960s. The economic impact these plans will have on the existing air tour companies threatens to shut down businesses that have been operating safely and responsibly for the past 30 years. This impact has reverberating consequences for the local and state economy, both of which are required elements of consideration and have been ignored.

Aerial tourism provides significant workforce development opportunities that support other sectors of the vertical lift industry to include firefighting and emergency medical services. The elimination of this workforce pool would exacerbate current pilot shortages and have impacts well beyond the limited footprint of the Mt Rushmore National Memorial.

The proposed options suggest flight allocation numbers that do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change, and NPS should in good faith respect that dynamic, as visitors alter their destinations and activities according to those trends.

Air tours are a vital option for many visitors providing a once-in-a-lifetime opportunity to experience natural and man-made landmarks. Visitors choosing aerial tourism represent the lowest impact to any park, recreation area, or memorial. Aerial tourism reduces impacts to parks, recreation areas and memorials. Aerial tourism provides the lowest form of impact in the park, leaving absolutely no trace, while reducing congestion and demand on park infrastructure in a significant way. For the NPS to ignore this fact is disingenuous at best.

By further restricting an already very limited number of allowable air tours, we are reducing the most environmentally responsible access to Mt. Rushmore, which is in opposition to the very goals stated by the NPS in the Public Scoping Documents. Through strict altitude and route requirements to mitigate noise just to name a few efforts air-tour operators are continually working to ensure they are responsible stewards of the environment.

Currently, there are no restrictions or mitigation efforts for other vehicles operating inside the boundaries of Mt. Rushmore. For example, throughout the summer months, heavy motorcycle traffic at the memorial produces far more impact than aerial tourism. A study was completed by the Town of Keystone, adjacent to the memorial that clearly shows this to be the case.

For individuals and groups with disabilities, aerial tourism provides the access promised in the mission of the NPS. The Memorial should be available for all visitors to enjoy. Limiting flights within the memorial boundary unfairly limits the elderly, very young, handicapped, and others who wish to experience the memorial. Limiting flights over the Memorial restricts access for those who might not have the time, resources, or physical ability to see the memorial any other way.

The NPS cannot independently drive the ATMP process behind closed doors. I strongly urge you to consult with the stakeholders, operators and NPOAG on the further development of the ATMPs to collaboratively address the concerns as an alternative to the current flawed approach.

Thank you.

Correspondence ID:	218	Project: 97377	Document:	123303
Name:	Whetham, Cheryl R			
Received:	Oct,05 2022 15:00:03			
Correspondence Type:	Web Form			

Correspondence: I'm pleased to see that the NPS notices that there is a problem with the number of air tours within Mount Rushmore National Memorial. There are also problems with the air tours over Black Elk Wilderness and Custer State Park. Basically, the entire Black Hills.

I'm a local outdoor enthusiast and over the past few years, my outdoor experience has been degraded by the number of air tours and the constant noise while trying to enjoy nature and solitude - remoteness from sights and sounds.

I think a combination of Alternative 2 and Alternative 4 would help meet the goals of the plan and protect the natural and cultural resources, wilderness character, visitor experience, and tribal lands. The current daily cap of 25 is degrading the Black Hills. It interferes with the atmosphere of peace and tranquility in the area as well as natural experiences in adjacent wilderness managed by the Black Hills National Forest. Even a 50% reduction to 13 daily / 1833 annually is still a large number of tours, while 0 tours is probably unrealistic, although highly desirable.

The most important considerations are number of flights allowed and implementation of noise reduction/quiet technology requirements.

The plan should also consider the impact of all residents and visitors in the Black Hills, not just at Mount Rushmore National Memorial. While I can seek a quieter time to hike Black Elk Wilderness, the July 4th tourist is trapped. They can't possibly enjoy a hike within Black Elk Wilderness with constant noise interruptions. When does the businesses desire for profit and a person's right to make a living become more important than the individual's right to enjoy the peace and solitude of nature in the Black Hills? Residents also have rights. In fact, don't we own the land?

Thank you for tackling this issue. Please do what's best for the land, air quality, wildlife and cultural resources.

Respectfully, Cheryl Whetham

Correspondence ID:	219	Project: 97377	Document:	123303
Name:	Crossland, Robin			
Received:	Oct,05 2022 15:01:05			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

NPOAG guidance is critical to the safety and economic stability of the air tour industry while balancing the needs of the environment, tribal interests, the NPS, and the FAA. Excluding NPOAG in the ATMP process is negligent and violates congressional intent.

The Public Scoping Documents serve to pre-shape public comment by offering options with no justification or data to support the offerings. This is a terribly flawed process, moving forward without critical NPOAG input, to produce an agency desired outcome.

Without the expertise and safety input from stakeholders, operators, and the NPOAG, serious safety concerns will arise as the NPS, with no expertise, moves, compresses, combines and shifts flight routes and altitudes that have been in place for years. The very routes in question were designed jointly between operators and the local Park Unit stakeholders.

Aerial tourism at Mt. Rushmore dates back to the 1960s. The economic impact these plans will have on the existing air tour companies threatens to shut down businesses that have been operating safely and responsibly for the past 30 years. This impact has reverberating consequences for the local and state economy, both of which are required elements of consideration and have been ignored.

Aerial tourism provides significant workforce development opportunities that support other sectors of the vertical lift industry to include firefighting and emergency medical services. The elimination of this workforce pool would exacerbate current pilot shortages and have impacts well beyond the limited footprint of the Mt Rushmore National Memorial.

The proposed options suggest flight allocation numbers that do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change, and NPS should in good faith respect that dynamic, as visitors alter their destinations and activities according to those trends.

Air tours are a vital option for many visitors providing a once-in-a-lifetime opportunity to experience natural and man-made landmarks. Visitors choosing aerial tourism represent the lowest impact to any park, recreation area, or memorial. Aerial tourism reduces impacts to parks, recreation areas and memorials. Aerial tourism provides the lowest form of impact in the park, leaving absolutely no trace, while reducing congestion and demand on park infrastructure in a significant way. For the NPS to ignore this fact is disingenuous at best.

By further restricting an already very limited number of allowable air tours, we are reducing the most environmentally responsible access to Mt. Rushmore, which is in opposition to the very goals stated by the NPS in the Public Scoping Documents. Through strict altitude and route requirements to mitigate noise just to name a few efforts air-tour operators are continually working to ensure they are responsible stewards of the environment.

Currently, there are no restrictions or mitigation efforts for other vehicles operating inside the boundaries of Mt. Rushmore. For example, throughout the summer months, heavy motorcycle traffic at the memorial produces far more impact than aerial tourism. A study was completed by the Town of Keystone, adjacent to the memorial that clearly shows this to be the case.

For individuals and groups with disabilities, aerial tourism provides the access promised in the mission of the NPS. The Memorial should be available for all visitors to enjoy. Limiting flights within the memorial boundary unfairly limits the elderly, very young, handicapped, and others who wish to experience the memorial. Limiting flights over the Memorial restricts access for those who might not have the time, resources, or physical ability to see the memorial any other way.

The NPS cannot independently drive the ATMP process behind closed doors. I strongly urge you to consult with the stakeholders, operators and NPOAG on the further development of the ATMPs to collaboratively address the concerns as an alternative to the current flawed approach.

Aerial viewing has the lowest impact on our national treasures; leaving minimal effect on our natural resources. It also provides opportunity for the very young, elderly and those with disabilities to enjoy the monument. Motorcycles, busses and people produce more noise than the helicopters.

Access to national parks should be for all, not just a select few.

Correspondence ID:	220	Project: 97377	Document:	123303
Name:	Huhtiniemi, Jukka L			
Received:	Oct,05 2022 15:30:19			
Correspondence Type:	Web Form			

Correspondence: Mount Rushmore Air Tour Management Plan Comments

Being a local hiking enthusiast I'm pleased to see that the NPS notices that there is a problem with the number of air tours within Mount Rushmore National Memorial. To me memorial should be a place to enjoy nature and solitude without noise from helicopters. Nowadays there is no solitude at Mount Rushmore Memorial or in Black Elk Wilderness Area.

New plans are needed to tackle the issue!

I think a combination of Alternative 2 and Alternative 4 would help meet the goals of the plan and protect the natural and cultural resources, wilderness character, visitor experience, and tribal lands.

Correspondence ID:	221	Project: 97377	Document:	123303
Name:	Dargatz, Deborah A			
Received:	Oct,05 2022 15:37:17			
Correspondence Type:	Web Form			

Correspondence: As a resident of Keystone for 25 years I have been continuously annoyed by the constant and low flying helicopters over our home. When Bruce Shultz had this attraction it never bothered us as he flew quite high and not directly over our home. Since Bill Durst brought the Black Hills Ariel Adventures to our community it has been beyond annoyance. They fly very low over our property, our conversations are continually interrupted, we can't hear the news and it's intrusive to our privacy to have people fly over our back yard where we spend a lot of time in the summer. I believe it has even harmed my hearing and past two years even experienced PTSD! Please stop this attraction. The community has brought complaints to the town board with out any action as they say it's an FAA issue. It's just too low and too loud for this small community. Hope things change this time.

Correspondence ID:	222	Project: 97377	Document:	123303
Name:	Richards, Mark			
Received:	Oct,05 2022 16:27:06			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

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Correspondence ID:	223	Project: 97377	Document:	123303
Name:	Malloy, Robert			
Received:	Oct,05 2022 16:42:04			
Correspondence Type:	Web Form			

Correspondence: Helicopters need to stay out of the national monument. I find it scary and dangerous that every time I go to the memorial the helicopters are hovering over my head, just a couple hundred feet above me. If one were to malfunction or if the pilot would commit an error there would be a catastrophe on the ground. Additionally the noise pollution is just obnoxious. The presidents would be ashamed if they would still be around to witness this.

Correspondence ID:	224	Project: 97377	Document:	123303
Name:	,			
Received:	Oct,05 2022 19:35:28			
Correspondence Type:	Web Form			

Correspondence: The helicopters that fly around Mount Rushmore are a wonderful experience for the small percentage of visitors who can afford the price. For the rest of Mount Rushmore visitors - and visitors to the Black Hills in general - the helicopters are a noisy menace and eye-sore. The helicopters seems to routinely push the limits of what is legally allowed, flying close to the Memorial boundaries and bringing their incessant noise with them. The sound makes it very difficult to hear ranger programming, or to even enjoy a peaceful moment of reflection below the sculpture. The helicopter tours benefit a very small proportion of the population, both for locals and visitors. Those benefits do not, and should not be allowed to, outweigh the negative impacts on other visitors. I support restricting helicopter tours around Mount Rushmore for the benefit of the greater population.

Correspondence ID:	225	Project: 97377	Document:	123303
Name:	,			
Received:	Oct,05 2022 21:14:52			
Correspondence Type:	Web Form			

Correspondence: As part of our mission to advocate for sustainable use of public lands, Norbeck Society comments reflect a desire to support a long-term management approach for the Mount Rushmore National Memorial that recognizes the importance of natural and cultural resources that serve and support growing numbers of people.

The Norbeck Society supports Alternative 2, no air tours in the planning area, because it provides the greatest protection of the Park's natural and cultural resources.

Norbeck Society constituents care about sites of spiritual and cultural significance, threatened and endangered species and other wildlife sensitive to noise; visitor opportunities for enjoyment and

solitude; ground-based visitor experiences; scenic qualities, and natural sounds. Alternative 2 is the alternative most congruent with some of the Park's most important management objectives such as:

- Visitor acoustic experience, hear and enjoy natural sounds, and be able to hear interpretive programming.
- Enjoy birds and wildlife that are not being disturbed. Ecological and biological processes can prevail.
- Preservation of traditional and cultural resources.

Additionally, the Norbeck Society is pleased that Alternative 2 would ensure the acoustic resources of the Black Elk Wilderness Area, helping to preserve wilderness character and to provide opportunities for solitude, primitive and unconfined recreation, including remoteness from sights and sounds. Alternative 2 enhances the untrammelled wildness, the naturalness, and undeveloped nature of the Black Elk Wilderness.

Conclusion

We support the duty of this Federal Agency to preserve and protect the Nation's natural and cultural assets. This important resource belongs to all American people. These most precious resources and our ability to enjoy them should not be cast aside for a few profiteers and their clients. The Norbeck Society favors Alternative 2 of the Air Tour Management plan.

Thank you for the opportunity to provide input to the National Park Service about the management of the Mount Rushmore National Memorial.

Correspondence ID:	226	Project: 97377	Document:	123303
Name:	A, E			
Received:	Oct,05 2022 21:36:26			
Correspondence Type:	Web Form			

Correspondence: Helicopters have added risk to climbers in the area, who cannot communicate with another on the rock over the loud noise pollution. It also takes away from the entire experience of being in the outdoors to escape from distractions like that.

Correspondence ID:	227	Project: 97377	Document:	123303
Name:	Dargatz, Christine A			
Received:	Oct,05 2022 23:10:06			
Correspondence Type:	Web Form			

Correspondence: I live in keystone. I have CPTSD and struggle to remain calm with the constant helicopter noise. It also interrupts the rare, few, quiet moments I have during the overwhelming busy summer season. Phone and in person conversations are nearly impossible during the day, especially since the helicopters fly inexcusably low over my house. It causes static and flickering on my TV. I highly doubt that the pilots and owner of this company would be comfortable if this chaotic noise was occurring over their places of residence. Imagine having your thoughts drowned out daily by unnecessary means. I fully support business in a keystone, however, it should not come at the cost of those of us who live here. There is simply no reason severe enough for these helicopters to be flying so dangerously low.

Correspondence ID:	228	Project: 97377	Document:	123303
Name:	Voters, Most True Local			
Received:	Oct,05 2022 23:15:47			

Correspondence Type:

Web Form

Correspondence: As a long time resident of the town of Keystone, the vast majority of us agree that the increase in Helicopter traffic flying over our homes has been incredibly disruptive. We are a small community and have the control of our community... We strongly encourage alternative number two and many of us are hoping to stop flights over our homes and businesses in Old Keystone altogether. Outside interests have begun taking over to make a quick buck and then get out each winter, without concern to the local population or the affect they have on us. We can and should be very picky about what we allow in our town, there has to be a balance, and we certainly don't need any disruptions to our way of life. These businesses like to say they are helping us as a community, but any and all businesses can be successful here simply because Mount Rushmore is right above us. The sheer volume ATVs are tearing up our trails and disrupting the family experience our area had always provided. The aerial traffic, if not held in check, will grow even worse, leaving little true peace and serenity we know and love.

Correspondence ID:	229	Project: 97377	Document:	123303
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Name:	Huot, Michael
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Received:	Oct,06 2022 05:38:48
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Correspondence Type:	Web Form
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Correspondence: I love to road bike on the roads around Mount Rushmore, it's so beautiful up there. However, anymore it sounds like a war zone with helicopters constantly flying over. The Mount Rushmore area is enjoyed by thousands of people each year, it doesn't seem right that a handful of people taking helicopter tours can make it so unpleasant for so many people. This is taking advantage of public spaces, tragedy of the commons.

Correspondence ID:	230	Project: 97377	Document:	123303
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Name:	,
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Received:	Oct,06 2022 06:47:17
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Correspondence Type:	Web Form
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Correspondence: Sound pollution (along with overpopulation) is one of the more pressing issues that the Black Hills faces today.

I appreciate the National Park Service for bringing this issue up for conversation. The NPS has a great opportunity to set a precedence for collaborating entities in the state to reevaluate what they think are appropriate sound pollution levels in their area.

Our animals today face a deluge of hurdles to living in and around the Black Hills. As people cram houses and lodging into every thinkable space, the animals of the Black Hills and the prairie are forced to adapt or perish. Migration and foraging patterns are disturbed or eliminated, carnivores are seen as a nuisance, and people recreate in nearly every corner of the map leaving little uninterrupted space for animals to exist. To complicate things further with sound pollution seems nasty and uninformed.

Less than 3% of land in the lower 48 is protected. Should we be having a conversation about making these spaces any less than sanctuaries for the plants and animals that have lived here for thousands of years? We do not have any greater right to be here than the animals who remain.

While it is necessary for The National Park Service to severely restrict the routes and levels that these helicopters fly at, I have concern that it may heavily impact surrounding areas with lower levels of restriction.

Mount Rushmore National Memorial has, by its very existence, made significant adverse impacts on natural and cultural resources, wilderness character, visitor experience, and tribal lands. While I support

decreasing the level of sound pollution in the Memorial, it seems the most critical to look at sound pollution in the Black Elk Wilderness.

The Wilderness Act of 1964 defines wilderness as "an area where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain." The Act's purpose was to preserve and protect natural ecosystems and wild areas and provide opportunities for solitude and retrospective recreation.

The Black Hills, as a whole, has strayed far from this ideal. We are quick to sell out for tourism, recreation, and production. The Black Hills have been a point of conflict and contention for centuries. People in power must uphold and protect the Black Hills as a place of solitude, peace, and reparation. I hope the National Park Service, as well as the National Forest Service, will choose integrity and compassion over industry and economy.

Do better.

Correspondence ID:	231	Project: 97377	Document:	123303
Name:	Westberry, Michael			
Received:	Oct,06 2022 07:07:08			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

NPOAG guidance is critical to the safety and economic stability of the air tour industry while balancing the needs of the environment, tribal interests, the NPS, and the FAA. Excluding NPOAG in the ATMP process is negligent and violates congressional intent.

The Public Scoping Documents serve to pre-shape public comment by offering options with no justification or data to support the offerings. This is a terribly flawed process, moving forward without critical NPOAG input, to produce an agency desired outcome.

Without the expertise and safety input from stakeholders, operators, and the NPOAG, serious safety concerns will arise as the NPS, with no expertise, moves, compresses, combines and shifts flight routes and altitudes that have been in place for years. The very routes in question were designed jointly between operators and the local Park Unit stakeholders.

Aerial tourism at Mt. Rushmore dates back to the 1960s. The economic impact these plans will have on the existing air tour companies threatens to shut down businesses that have been operating safely and responsibly for the past 30 years. This impact has reverberating consequences for the local and state economy, both of which are required elements of consideration and have been ignored.

Aerial tourism provides significant workforce development opportunities that support other sectors of the vertical lift industry to include firefighting and emergency medical services. The elimination of this workforce pool would exacerbate current pilot shortages and have impacts well beyond the limited footprint of the Mt Rushmore National Memorial.

The proposed options suggest flight allocation numbers that do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry

marketing trends change, and NPS should in good faith respect that dynamic, as visitors alter their destinations and activities according to those trends.

Air tours are a vital option for many visitors providing a once-in-a-lifetime opportunity to experience natural and man-made landmarks. Visitors choosing aerial tourism represent the lowest impact to any park, recreation area, or memorial. Aerial tourism reduces impacts to parks, recreation areas and memorials. Aerial tourism provides the lowest form of impact in the park, leaving absolutely no trace, while reducing congestion and demand on park infrastructure in a significant way. For the NPS to ignore this fact is disingenuous at best.

By further restricting an already very limited number of allowable air tours, we are reducing the most environmentally responsible access to Mt. Rushmore, which is in opposition to the very goals stated by the NPS in the Public Scoping Documents. Through strict altitude and route requirements to mitigate noise just to name a few efforts air-tour operators are continually working to ensure they are responsible stewards of the environment.

Currently, there are no restrictions or mitigation efforts for other vehicles operating inside the boundaries of Mt. Rushmore. For example, throughout the summer months, heavy motorcycle traffic at the memorial produces far more impact than aerial tourism. A study was completed by the Town of Keystone, adjacent to the memorial that clearly shows this to be the case.

For individuals and groups with disabilities, aerial tourism provides the access promised in the mission of the NPS. The Memorial should be available for all visitors to enjoy. Limiting flights within the memorial boundary unfairly limits the elderly, very young, handicapped, and others who wish to experience the memorial. Limiting flights over the Memorial restricts access for those who might not have the time, resources, or physical ability to see the memorial any other way.

The NPS cannot independently drive the ATMP process behind closed doors. I strongly urge you to consult with the stakeholders, operators and NPOAG on the further development of the ATMPs to collaboratively address the concerns as an alternative to the current flawed approach.

Let us also take into consideration the recent rulings by the Supreme Court from Wisconsin V. EPA in that the regulatory findings in there stated that executive agencies such as the EPA, and in suite in this case, the FAA and NPS, are not at liberty nor do they have the authority to change rules and regulations as they see fit. It is not within their power as an executive agency and in so lies within the jurisdiction of the judicial branches, ie, Congress. Thank you and good day sir/ma'am.

Correspondence ID:	232	Project: 97377	Document:	123303
Name:	Cummings, Ehakela			
Received:	Oct,06 2022 07:35:37			
Correspondence Type:	Web Form			

Correspondence: Like many people residing in the Black Hills, I seek solitude among the beautiful granite spires and lush forests in Mt. Rushmore Memorial, Black Elk Wilderness, and Custer State Park. If you've spent even just a couple of hours hiking in any of these areas on a fair weather day, chances are sure that a helicopter or several roared past, disturbing the peace we seek by entering these areas. As a young Lakota, this land holds a special place in my heart that words cannot describe. It is part of me, my family, my ancestors, and my culture. I spend a lot of time rock climbing in the memorial. The emotions I feel driving up to and past the faces are heavy every trip. The masses of people stopped along the road, taking pictures and admiring one of the most remarkable feats of racism on display in our country, is a slap in the face, but one I have learned to tolerate. Can we let that be enough? The helicopter tours are blatantly disrespectful and downright obnoxious. They disturb our experiences in nature, disrupt the ecological flow of these areas, and are an unnecessary emitter of greenhouse gases. Everything about the helicopter tours is unnatural.

Correspondence ID:	233	Project: 97377	Document:	123303
Name:	MOHROR, CAROLE A			
Received:	Oct,06 2022 07:38:54			
Correspondence Type:	Web Form			
Correspondence:	i don't approve of the tourist helicopters flying right over the KEYSTONE ELDERLY BUILDING all summer long during the tourist season and before, and beyond. it is disruptive and it is annoying for the people who live in this area. it is noise pollution. we do not like it. isn't there another route these helicopters can take?			
Correspondence ID:	234	Project: 97377	Document:	123303
Name:	Woodland, Jakob K			
Received:	Oct,06 2022 07:57:32			
Correspondence Type:	Web Form			
Correspondence:	These flight paths may technically fall in the memorial area but the impact of these tours is currently being felt in the surrounding wilderness areas. If the purpose of the wilderness designation is to provide sanctuary for wildlife, then the current altitude and frequency in the general area of all tours is unacceptable. Frequently, helicopters fly below the altitude of the Cathedral spires which is extraordinarily disruptive to wildlife and people enjoying quiet, human powered activities. Quiet is an underrated quality that is in danger of being lost.			
Correspondence ID:	235	Project: 97377	Document:	123303
Name:	Plourde, Doug			
Received:	Oct,06 2022 08:29:16			
Correspondence Type:	Web Form			
Correspondence:	The helicopters around the black hills are an extreme Inconvenience and in some situations a safety hazard. They have been flying at mostly reasonably heights all summer but as of recently i've seen them fly 200 feet off the ground. I find it extremely inconsiderate for the helicopter tour company's to conduct their business with no regards for how they impact the out door experience of the people on the ground. It would greatly improve everyone's outdoor experience if the helicopters would fly at least 2000 feet higher.			
Correspondence ID:	236	Project: 97377	Document:	123303
Name:	Jarvis, Ryan R			
Received:	Oct,06 2022 08:37:50			
Correspondence Type:	Web Form			
Correspondence:	Helicopters make me scared and ruin the outdoors			
Correspondence ID:	237	Project: 97377	Document:	123303
Name:	Thoemke, Brooke			
Received:	Oct,06 2022 09:06:34			
Correspondence Type:	Web Form			
Correspondence:	When hiking, climbing and camping in the area I feel it's no longer a peaceful retreat as it used to be. With the constant helicopters flying overhead the noise is disturbing to tourists ans			

definitely also for the wildlife. This should be brought to a minimum or decreased to only certain days or hours in the day. It just seems constant now.

Correspondence ID:	238	Project: 97377	Document:	123303
Name:	,			
Received:	Oct,06 2022 09:25:47			
Correspondence Type:	Web Form			

Correspondence: Helicopter tours allow diverse and equitable opportunities for people of all backgrounds and lifestyles to experience the many benefits that the Parks provide. Without airborne tours via helicopter, those who are unable to hike, walk or otherwise mobilize to the parks cannot experience them. Flying allows the layman to see the world in perspective, as opposed to the tyranny of the ground. As for noise, Sturgis Week in South Dakota is the far more imperative threat to hearing and nature. Loud motorcycles disrupt the immersion of nature and the beauty of the environment to a point that helicopters can in no way meet. Lastly, the business and other influence that helicopter tours and their pilots provide is something that would negatively impact the local community in a significant way, especially with small towns such as Keystone and Interior.

Correspondence ID:	239	Project: 97377	Document:	123303
Name:	Emery, Brandon			
Received:	Oct,06 2022 10:38:35			
Correspondence Type:	Web Form			

Correspondence: I am the owner/manager at sylvan rocks climbing school in Custer SD, a guided rock climbing tour company. The helicopter tours have continuously been an issue for rock climbers over the course of the past 10 years. In previous years, they have continued to fly closer and closer to the ground as well as the rocks. This is not only an issue in Mount Rushmore (where my business is a paying CUA holder), but also a serious issue over Custer State Park.

It is not at all uncommon for helicopters to be flying at an elevation which can be presumed less than 300ft, as they are almost ALWAYS flying lower than the tallest rock formations. It is very frequent that when on the summit of a rock, I can look the pilot in the face, and count the number of passengers in the helicopter, indicating that they are flying FAR too close to the rock and in turn myself, my employees, our customers, and other recreational climbers.

I have reached out to the company for years with no success.

In addition to the general safety concern of their proximity to rocks and other humans, I have noticed a decrease in wildlife such as deer and mountain goats. I presume this is because of the noise and disruption of the helicopters flying at such obnoxiously low elevations, to the point that it quite literally rattles rock gullies as they fly over.

I have had numerous encounters with helicopters, 98% of which have been negative and created serious distress to myself, and has caused my customers to be upset. Instead of spending their time in the wilderness on a hard earned summit, they are ready to get down because of the constant roar of the helicopters flying so close that it makes them nervous.

We have had a helicopter crash and death before in the black hills. At the elevation they are flying and with how frequent they are going, it is only a matter of time before it happens again.

For all these reasons, I strongly believe that a minimum elevation of 2,000ft should be STRICTLY enforced. And those pilots in violation of this order should lose their license.

I know for a fact the company near Keystone owned by Andrew Busse adheres to current FAA regulations. Andrew is a climber and respects the height requirements. He also takes a different less disruptive path on his tours. His company is not the issue.

Black Hills Aerial Adventures, the company located off of highway 385 between hill city and Custer, notoriously flies under 200ft in both Custer state park and Mount Rushmore and has done so for the past 10 years and unless something is done will continue to do so. They also recently painted all their helicopters a very bright like green, leaving no doubt which company the helicopter belongs to.

I would be happy to share my opinion on this as another tourism based local business owner who has felt the negative impacts of the helicopter tours, should that be desired.

Correspondence ID:	240	Project: 97377	Document:	123303
Name:	Bellisle, Andrew			
Received:	Oct,06 2022 12:52:27			
Correspondence Type:	Web Form			

Correspondence: Helicopters on patterns near/within the memorial boundaries have become more and more of an issue since I moved to the Hills. The sound they emit can completely engulf the spaces between spires and rock formations. As a rock-climber, I've found myself in multiple scenarios where I am unable to communicate effectively with a partner over the noise of a chopper. But not only is this a real danger to us, it's a nuisance to anyone trying to enjoy the Rushmore area (hikers, cyclists, climbers, etc). In the summer, it feels almost impossible to escape the noise of choppers and motorcycles in the hills. I know you can't control motorcycles. But it seems like you are in a position to at least reduce the noise pollution from the air, by directing flight patterns further away from the more remote wilderness areas of recreation.

Thanks for your consideration.

Andrew Bellisle

Owner of Black Hills Basecamp (Climbing Gym)

Correspondence ID:	241	Project: 97377	Document:	123303
Name:	Allen, Alice			
Received:	Oct,06 2022 13:41:21			
Correspondence Type:	Web Form			

Correspondence: Dear Superintendent, MORU

Thank you for the opportunity to comment on the ATMP EA. We were not on your original mailing list. We request to be added to your mailing list for this project.

I am the current President of Black Hills Back Country Horsemen of South Dakota. Our mission is to promote the common sense use and enjoyment of horses in America's back country and wilderness areas; to work to ensure that public lands remain open to recreational stock use; to assist the various government, state and private agencies in their maintenance and management of said resource; and to educate, encourage, and solicit active participation in the wise and sustaining use of the back country resource by horsemen and the general public commensurate with our heritage.

To that end we have worked closely with the National Park Service at Mt. Rushmore National Memorial in reconstructing and improving the Blackberry Trail located in the southwest corner of the Memorial. In fact our organization is recognized in the display at the kiosk at the Blackberry trailhead. Hundreds of horsemen use the Blackberry Trail each summer to visit and appreciate the sculpture from the hitchrails

and picnic tables located at the top of the trail. Access to the Blackberry Trail for horsemen is from the trails on the Black Hills National Forest which pass through the adjacent Black Elk wilderness.

I can say from personal experience that the noise and vibrations from helicopter tours banking their turn directly overhead of the picnic tables is NOT a wilderness or back country experience and greatly detracts from the enjoyment of the Memorial.

In addition, many of the horsemen who use this trail bring their own personal animals from locations all across the country. Many of these animals may not have experienced the noise and vibrations of helicopters in very close proximity. These animals can react violently with the potential to injure themselves and their riders. This has become a major safety issue with the huge increase in the number and frequency of helicopter tours over the past few years.

Please consider changing your approved routes for helicopter air tours to avoid a banking turn directly over the Blackberry Trail, hitchrails and picnic site.

We fully support the intent of the ATMP to reduce existing impacts to the visitor experience, wilderness character of the Black Elk wilderness, and equestrian safety. We prefer Alternative 2 which would mitigate all of our concerns. Alternative 4 would be preferable to Alternative 3, as we consider the impacts to already be too high. Alternative 4 in conjunction with an altered route would greatly improve the experience and safety for equestrians using the Blackberry Trail.

Thank you again for the opportunity to comment.

Alice Allen, President

Black Hills Back Country Horsemen of South Dakota

Correspondence ID:	242	Project: 97377	Document:	123303
Name:	,			
Received:	Oct,06 2022 14:11:20			
Correspondence Type:	Web Form			

Correspondence: The hills are so beautiful & peaceful. During the rally it sure gets loud & disturbing. The increase in helicopter tours has created a rally like experience throughout the entire summer season.

This cannot be great for the animals in our area as well.

Thank you for taking comments, I vote no helicopters in the hills.

Correspondence ID:	243	Project: 97377	Document:	123303
Name:	Beaumont, Derek			
Received:	Oct,06 2022 14:38:19			
Correspondence Type:	Web Form			

Correspondence: As both a climber and a recreational pilot, I do not see why one hobby takes priority over another. There are many other areas to blink that get less helicopter traffic if that's what people are after. Tourism is also an important i distort to the area. Regulation rarely is the best answer.

Correspondence ID:	244	Project: 97377	Document:	123303
Name:	McClure, Lynn			
Received:	Oct,06 2022 15:22:41			
Correspondence Type:	Web Form			

Correspondence: To: National Park Service and Federal Aviation Administration

Re: Scoping comments for the Mount Rushmore National Memorial air tour management plan

Please find comments from the National Parks Conservation Association (NPCA) on the alternatives presented in the Mount Rushmore National Memorial air tour management plan. Since 1919, NPCA has been the leading voice of the American people in protecting and enhancing our National Park System. On behalf of our nearly 1.6 million members and supporters, we ask you to consider our views. NPCA strongly supports the National Park Service (NPS) in adopting Alternative 2 - no air tours in the planning area - as the preferred alternative.

The following excerpt from the Mount Rushmore National Memorial Scoping Document indicates clear and documented impacts to the Park resources:

"The NPS determined that the noise from the current level of air tours is inconsistent with the Park's purpose and values. Frequent and loud noise interruptions from air tours impact sacred sites and ceremonial uses associated with Tribal Nations, impact public enjoyment and interpretive programing, and degrade the Park's cultural and natural setting."

According to its 2006 Management Policies, NPS is required to avoid impacts to sacred sites to the extent possible (NPS 2006 Management Policies 5.3.5.3.2). Also from the Scoping Document:

"Tribes and individual tribal members have consistently noted that persistent air tours over the Park unreasonably interfere with their connections to the sacred landscape of the Black Hills."

Finally, the Scoping Document states:

"Existing air tour operations also repeatedly interrupt and unreasonably interfere with interpretive programs and visitor activities at many sites, including the Park amphitheater, Presidential Trail, Youth Exploration Area, and Mount Baldy. The current level of air tours diminishes visitor opportunities to learn about and be inspired by the Park's resources and values, and unreasonably interferes with the atmosphere of peace and tranquility in the Park as well as natural soundscapes in adjacent wilderness managed by the Black Hills National Forest."

The NPS acknowledges that the current level of air tours at Mount Rushmore National Memorial cannot be mitigated to avoid or prevent unacceptable impacts to Tribal lands and people, wildlife and wilderness values, and visitor enjoyment of the site.

The above excerpts from the Scoping Document point clearly to Alternative 2 - no air tours in the planning area - as the Preferred Alternative of the NPS. NPCA strongly supports the NPS at Mount Rushmore in discontinuing air tours at the Park.

Sincerely,

Lynn McClure

Senior Director, Midwest

312-343-7216

lmcclure@npca.org

Correspondence ID:	245	Project: 97377	Document:	123303
Name:	STISSER, Daryl J			
Received:	Oct,06 2022 15:50:36			
Correspondence Type:	Web Form			

Correspondence: Hello National Park Service

If something in my visual field is unpleasant to me, I can choose not to look at it, but short of wearing a set of really fancy noise canceling headphones we cannot keep the noise caused by helicopter tours from wrecking our outdoor experience when visiting the Southern Black Hills and Mount Rushmore.

Perhaps when there were just one or 2 helicopters operating it was tolerable, but now we have multiple operators and they fly multiple aircraft such that it seems that there is never a peaceful moment. Recently while visiting Mount Rushmore there were low flying aircraft passing overhead every 7 minutes. So, in reality, there was never a quiet moment as of course helicopters are really loud so you hear them from a long ways away and not just when they are overhead. This is unacceptable and I hope you can do something to stop it. If nothing else, just making these machines fly higher and faster would be a start. It be even better though if we could rid the Black Hills of these operators all together! The noise and petrol pollution they spew is unacceptable.

Unfortunately, I realize that whatever you do to push the aircraft out of Rushmore areas airspace will likely just put more pressure on Custer State Park, The Black Elk Wilderness and surrounding areas...such as where I am lucky enough to live. Still, getting the tour operators to follow suggested elevation limits and stop or limit flights in MORU will be a great start. The public will thank you for your efforts.

Correspondence ID:	246	Project: 97377	Document:	123303
Name:	Rufrano, Catherine			
Received:	Oct,06 2022 16:09:49			
Correspondence Type:	Web Form			

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I have serious concerns with the process of the Air Tour Management Plan for Mt. Rushmore National Memorial by the National Park Service (NPS) and the Federal Aviation Administration (FAA). Both NPS and the FAA have ignored stakeholders, operators and the National Parks Overflight Advisory Group (NPOAG), a rulemaking committee put in place by congress to provide advice, information, and recommendations to the agencies in the implementation of the National Parks Air Tour Management Act of 2000.

NPOAG guidance is critical to the safety and economic stability of the air tour industry while balancing the needs of the environment, tribal interests, the NPS, and the FAA. Excluding NPOAG in the ATMP process is negligent and violates congressional intent.

The Public Scoping Documents serve to pre-shape public comment by offering options with no justification or data to support the offerings. This is a terribly flawed process, moving forward without critical NPOAG input, to produce an agency desired outcome.

Without the expertise and safety input from stakeholders, operators, and the NPOAG, serious safety concerns will arise as the NPS, with no expertise, moves, compresses, combines and shifts flight routes and altitudes that have been in place for years. The very routes in question were designed jointly between operators and the local Park Unit stakeholders.

Aerial tourism at Mt. Rushmore dates back to the 1960s. The economic impact these plans will have on the existing air tour companies threatens to shut down businesses that have been operating safely and responsibly for the past 30 years. This impact has reverberating consequences for the local and state economy, both of which are required elements of consideration and have been ignored.

Aerial tourism provides significant workforce development opportunities that support other sectors of the vertical lift industry to include firefighting and emergency medical services. The elimination of this workforce pool would exacerbate current pilot shortages and have impacts well beyond the limited

footprint of the Mt Rushmore National Memorial. In addition, it will affect the students currently enrolled in flight programs at various schools and university across the county.

The proposed options suggest flight allocation numbers that do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change, and NPS should in good faith respect that dynamic, as visitors alter their destinations and activities according to those trends.

Air tours are a vital option for many visitors providing a once-in-a-lifetime opportunity to experience natural and man-made landmarks. Visitors choosing aerial tourism represent the lowest impact to any park, recreation area, or memorial. Aerial tourism reduces impacts to parks, recreation areas and memorials. Aerial tourism provides the lowest form of impact in the park, leaving absolutely no trace, while reducing congestion and demand on park infrastructure in a significant way. For the NPS to ignore this fact is disingenuous at best.

By further restricting an already very limited number of allowable air tours, we are reducing the most environmentally responsible access to Mt. Rushmore, which is in opposition to the very goals stated by the NPS in the Public Scoping Documents. Through strict altitude and route requirements to mitigate noise just to name a few efforts air-tour operators are continually working to ensure they are responsible stewards of the environment.

Currently, there are no restrictions or mitigation efforts for other vehicles operating inside the boundaries of Mt. Rushmore. For example, throughout the summer months, heavy motorcycle traffic at the memorial produces far more impact than aerial tourism. A study was completed by the Town of Keystone, adjacent to the memorial that clearly shows this to be the case.

For individuals and groups with disabilities, aerial tourism provides the access promised in the mission of the NPS. The Memorial should be available for all visitors to enjoy. Limiting flights within the memorial boundary unfairly limits the elderly, very young, handicapped, and others who wish to experience the memorial. Limiting flights over the Memorial restricts access for those who might not have the time, resources, or physical ability to see the memorial any other way.

The NPS cannot independently drive the ATMP process behind closed doors. I strongly urge you to consult with the stakeholders, operators and NPOAG on the further development of the ATMPs to collaboratively address the concerns as an alternative to the current flawed approach.

Correspondence ID:	247	Project: 97377	Document:	123303
Name:	Kelley, John			
Received:	Oct,06 2022 16:14:57			
Correspondence Type:	Web Form			

Correspondence: Comments on Scoping for Mount Rushmore National Memorial ATMP, Oct 6, 2022

Preface. Mount Rushmore National Memorial is not a "natural setting". There is nothing "natural" about spending a decade blasting a sculpture into a mountain. There is nothing of a natural setting with a highway that ushers in up to 3 million visitors. There is nothing natural that parks the vehicles caravanning 3 million visitors, or feeding them, or disposing of their waste. Get over it. Yes, Mount Rushmore has a few things to offer the nation in terms of history, reflection (slave holders, Indian genocide, Klansman sculptor), but it's not a natural setting. (The NPS folks in Cambridge need to read that.) While a review appears in law, one is also struck by the hypocrisy to review aerial tour "impacts" while the NPS ignores the terrain-based human and polluting vehicle impacts treading on a fraction of the 2-square mile memorial. The NPS should review and cap the maximum numbers of visitors and their motor vehicles at Mount Rushmore. Aviation and aerial sightseeing existed decades before there was a

Mount Rushmore National Memorial (MRNM); and decades before there were vehicle-based tours to MRNM. Aerial sightseeing ought to have a precedent among sightseeing tours and visitation.

Alternative 1 is inartfully framed as it reaches for the pre-determined goal of the inquiry of the National Park Service. A proper framing of Alternative 1, no action, would be to continue the annual Interim Operating Authority (IOA) with its annual amendments that allow the NPS to comply with the Air Tour Management Plan. The IOA is not fixed in stone. Yet the NPS acts with Alternative 1, as if the IOA is fixed in stone. It is not. Therefore, I favor Alternative 1, modified to the world we live in - an adaptable management world.

Alternative 2 is similarly, lazily, thoughtlessly framed as an also do next to nothing alternative. (I.e., shut down aerial tours, pretending the surface insults ((outside the scope of the proposed EA) do not affect MRNM). Alternative 2 ignores that aerial sightseeing of MRNM, or of its former names Cougar Mountain, Sugarloaf Mountain, Slaughterhouse Mountain and Keystone Cliffs. Alternative 2 ignores the effects on employees, businesses, and tax revenues in Keystone, Custer, Pennington, Custer, and Lawrence Counties.

Alternative 3 is the only reasonable alternative for the NPS, MRNM, and the aerial sightseeing businesses - yet Alternative 3 carries fatal flaws. I secondarily favor a harshly modified Alternative 3.

a) First, the NPS, MRNM ought to ACT like the federal government. Alternative 3 ought lay out at the annual meeting with aerial sightseeing operators - the dates and times for the seasons "no fly" windows (time windows and dates) in the meeting. In this manner the MRNM and sightseeing operators can schedule. Scheduling will deconflict noise issues. This is not hard. The Fourth of July occurs at the same time annually. NPS should, acting like the federal government, build an expectation, an annual, seasonal expectation.

b) MRNM must give the operators an annual quota. Visitation is not stagnant or steady state at either MRNM or at the operators. MRNM does not limit its visitation per day and neither should MRNM impose a daily limit on the operators. Annual quotas with reasonable growth are a reasonable expectation. Aerial sightseeing growth may come at a cost - ie. quiet technology, timeframe adjustments, etc.

c) Alternatives 3 & 4 failed via the diagrams/maps, to carve out an operational flight window for the Keystone heliport. This failure subjects every take off and landing to a non-compliance issue. This mapping oversight is careless and thoughtless.

d) There is no incentive in Alternatives 3 and 4 for operators to embrace quiet aviation technology - and by doing so to decrease flight levels and increase sightseeing visitation. Quiet technology that the Alternatives 3 and 4 must embrace include NOTAR (no tail rotor) helicopters, electrically powered aviation, and other modifications. Alternative 3 reads as if the NPS, MRNM "adaptive management" only "adapts" in the more restrictive direction.

e) The NPS, MRNM pretends it's a science-based organization. Yet this MRNM IGNORES measuring, analyzing, and applying aviation noise science - noise on which the MRNM proposal imagines is an issue. The NPS MRNM has no idea which routes, and which aircraft types, and which times of day create a lesser or greater noise at any specific place on the developed (visited) places on MRNM. The NPS, MRNM has no acoustical metrics to guide its analysis; thus it's likely the NPS MRNM identification of a "problem" and alternatives for a "cure" are arbitrary and capricious. The NPS MRNM should complete a 2 year noise study to collect, document, and measure impacts before arbitrarily concocting remedies.

e) Giving any group an open invitation for celebrations, reflections, and ceremonies is disingenuous, arbitrary, and capricious. Aerial sightseeing operators have investment-backed expectations. Pick a date and set a time window: for the naturalization ceremony (if a judge is not available, then find another),

for tribal reflections (be mindful that the tribes didn't use the Georgian calendar so fencing of the month of June as the NPS did at Bear Lodge (Devil's Tower) NM) is wildly unreasonable, arbitrary, and capricious.

f) Limiting aerial sight seeing tours to an hour after sunrise to an hour before sunset appears lacking in any rule of reason or aviation safety, and thus appears as arbitrary and capricious. Sunrise is an exceptional time to view the southeast facing sculpture.

g) The analysis ignores any impact on local businesses that directly and indirectly cater to aerial sightseeing tours. While economics are not determinative; economics are a key component of the human condition.

Mount Rushmore is NOT the Grand Canyon; it is not a "natural wonder" in a "natural setting" - and should not be treated as if it were.

Correspondence ID:	248	Project: 97377	Document:	123303
Name:	Vidal, Britton L			
Received:	Oct,06 2022 16:15:50			
Correspondence Type:	Web Form			

Correspondence: As a born and raised Black Hills resident, I have enjoyed the outdoors for my physical, mental and spiritual well-being. With the addition of the helicopters flying in the Black Hills, the peace of the Black Hills has changed drastically. I know personally that the most recent helicopter company used the argument that the motorcycles cause similar noise pollution; however, motorcycles are not found in remote areas where hikers and climbers are trying to enjoy the peace and serenity of the Black Hills. Now, the helicopters are everywhere and the noise is disturbing all places. Please put restrictions on their flight patterns out of the wilderness areas and national formats. Thank you for your considerations.

Correspondence ID:	249	Project: 97377	Document:	123303
Name:	, Gus			
Received:	Oct,06 2022 16:30:53			
Correspondence Type:	Web Form			

Correspondence: I commend the MORU NPS Team for addressing this important issue. I urge the Team to adopt Alternative 4. There are economic values to the flight operators which would be eliminated with Alternative 2. By proximity the Black Elk Wilderness (BEW) suffers from this intrusion of air space. The solitude element is severely hampered by the noise. As a user of the Blackberry trail I can attest to the abrupt jarring of helicopter noise (not so much with fixed wing) along the trail when you are out there to enjoy nature's sounds or silence. Have any studies been conducted on wildlife in association with helicopter noise? Obvious MORU is not designated Wilderness but the values inherent to Wilderness are affected by the flight paths. Any regulation controlling flight tours in the air space of the Memorial would be welcome. Alternative 4 seems to keep business in place but give visitors a break by season and hours.

Correspondence ID:	250	Project: 97377	Document:	123303
Name:	,			
Received:	Oct,06 2022 16:54:25			
Correspondence Type:	Web Form			

Correspondence: The helicopters are loud and I'm noxious it ruins my chance to enjoy peace with the democracy I love you so much. Alternative 2

Correspondence ID:	251	Project: 97377	Document:	123303
Name:	Pattee, William J			
Received:	Oct,06 2022 18:30:27			
Correspondence Type:	Web Form			

Correspondence: I am firmly against all forms of air tour at Rushmore (and any site for that matter). The tours impact the environment, integrity of the site, and the vast majority of visitors in a negative way. Additionally, tour companies only benefit the most wealthy visitors and provide little support to gateway communities.

Correspondence ID:	252	Project: 97377	Document:	123303
Name:	Beck, Rika			
Received:	Oct,06 2022 18:35:22			
Correspondence Type:	Web Form			

Correspondence: I no longer live in South Dakota, but I spent a large portion of my formative years living and recreating in the Black Hills. When I was back to visit recently, I noticed how awful and distracting the constant helicopter noise is. The helicopter pilots often fly over the Black Elk Wilderness even though they are not supposed to. It really detracts from the gorgeous scenery and peace and quiet of nature. I hope that NPS will consider some limits on the number and duration of helicopter tours. Recreationalists deserve to enjoy the beauty of the parks as well and the loud helicopters really take away from the nature experience.

Correspondence ID:	253	Project: 97377	Document:	123303
Name:	,			
Received:	Oct,06 2022 18:54:37			
Correspondence Type:	Web Form			

Correspondence: 1. The objective of this project is stated in "Project Introduction" on page 2. "The objective of the ATMP, under the Act, is to develop acceptable and effective measures to mitigate or prevent the SIGNIFICANT adverse impacts of commercial air tour operation on the Park's natural and cultural resources, tribal sacred sites and ceremonial areas, wilderness character, and visitor experience." [Emphasis added to the word "significant" which is clearly the requirement of the Act.]

The project "Need" states, "The Act requires that the FAA and the NPS develop acceptable and effective measures to mitigate or prevent SIGNIFICANT adverse impacts, if any, of commercial air tour operations on natural and cultural resources, wilderness character, visitor experience, and tribal lands." [Emphasis again on mitigating or preventing "significant" adverse impacts, if any.]

The Air Tour Act [49 USC 4012] states, "An air tour management plan for a national park - shall justify and document the need for measures taken pursuant to subparagraphs (A) through (E) and include such justifications in the record of decision."

Based on the stated objective, need, and justification required for measures taken, levels of significance must be established and fully explained for this project in the proposed EA to establish compliance.

2. The scoping document proposes several "Alternatives Considered and Dismissed"; prematurely and inappropriately.

The Newsletter states that "These alternatives were dismissed from further consideration because the NPS determined they would result in UNACCEPTABLE impacts... under the NPS Management Policies 2006 1.4.7.1." [Emphasis added to the term 'unacceptable';.]

NPS Management Policies 2006 1.4.7 states, "In making a determination of whether there would be an impairment, an NPS decision-maker must use his or her professional judgment. This means that the decision-maker must consider any environmental assessments or environmental impact statements required by the National Environmental Policy Act of 1969 (NEPA); consultations required under section 106 of the National Historic Preservation Act (NHPA), relevant scientific and scholarly studies; advice or insights offered by subject matter experts and others who have relevant knowledge or experience; and the results of civic engagement and public involvement activities relating to the decision. The same application of professional judgment applies when reaching conclusions about "unacceptable impacts."

Therefore, the dismissal of alternative(s) is premature.

3. The scoping document states, "The NPS has determined that the current level of air tours cannot be mitigated to avoid or prevent unacceptable impacts and therefore any alternative that would maintain the current number of air tours over the Park does not meet the purpose and need for the plan." How was this determined prior to analyzing impacts in the EA? Again a premature determination.

4. The "Quiet Technology Incentives" section states, "Operators that have converted to quiet technology aircraft may request to be allowed to conduct air tours beginning at sunrise or ending at sunset on all days that flights are authorized." Quiet technology helicopters require millions of dollars of investment. Adding one hour of available flight time after sunrise and one hour before sunset for a maximum of 16 flights per day, and no flights from October 1 through April 30, seems like the proposed "incentive" is laughably inadequate, and not in compliance with the Act.

The purpose of "incentives" is to encourage air tour operators to invest in very expensive aircraft. The EA must therefore include an analysis of the economics to determine if the incentives are realistic and meaningful.

Correspondence ID:	254	Project: 97377	Document:	123303
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Name:	DeHaai, Jimmy
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Received:	Oct,06 2022 19:00:47
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Correspondence Type:	Web Form
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Correspondence: The density of helicopter tours over Mount Rushmore National Memorial is far too high. The constant noise from rotary blades has become a nuisance. I would recommend limiting the volume of tours, limiting the hours allowed and/or heightening the flight altitude over Mount Rushmore and surrounding areas. Thanks.

Correspondence ID:	255	Project: 97377	Document:	123303
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Name:	Scott, Robin
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Received:	Oct,06 2022 20:25:56
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Correspondence Type:	Web Form
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Correspondence: Please let them fly.

Correspondence ID:	256	Project: 97377	Document:	123303
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Name: , Kevin
Received: Oct,06 2022 21:06:45
Correspondence Type: Web Form

Correspondence: On multiple occasions at mt Rushmore and nearby surrounding areas, family, friends and myself have had our peace and quiet rudely interrupted by the roar of multiple helicopters. This is a great distraction from the awe inspiring monument and the sacred natural areas surrounding the monument. While I favor an outright ban on helicopter noise in the area perhaps a balance between the rights of everyday citizens to enjoy the area in quiet grandeur and the business operating the helicopter tours can be found. Something needs to be done and I implore this body to find a solution.

Correspondence ID: 257 Project: 97377 Document: 123303
Name: Kenyon, Craig
Received: Oct,06 2022 21:11:01
Correspondence Type: Web Form

Correspondence: It is my opinon as a frequent visitor to Mount Rushmore National Memorial that helicopter tours should not occur below 2,000 ft AGL.

The reasons for this are as follows:

1. Noise from the current, frequent helicopter tours interferes with saftey commands spoken between climbing partners while technical climbing at the Mount Rushmore Natl Memorial Park, causing serious safety situations at critical moments.
2. Frequent, low flying helicopter tours degrades the outdoor experience for user groups, including climbers, on the ground because of the high decibles of noise
3. Keeping aircraft above 2,000 ft AGL would aleveate the detrimental effects of machine noise on users of the monument that are outside on the ground

Correspondence ID: 258 Project: 97377 Document: 123303
Name: Kruse, Katrina
Received: Oct,06 2022 21:14:19
Correspondence Type: Web Form

Correspondence: I spend a 1-2 weeks every summer at Camp Judson, right between Keystone and Hill City. In the last ten years I have noticed the increasing air traffic. The constant noise pollution takes away from the natural beauty of the hills. Please consider limiting flights in the Black Hills National First.

Thanks for your consideration,
Katrina Kruse

Correspondence ID: 259 Project: 97377 Document: 123303
Name: Fitch, Ken
Received: Oct,06 2022 21:40:03
Correspondence Type: Web Form

Correspondence: The fact is that Mt. Rushmore would be a priority terrorist target.
What precautions would be necessary to prevent such an action from occurring?

Are pilots required to have security clearance?

What kind of measures are necessary to insure thorough background checks?

What security checks would be conducted for staff at the aircraft facilities?

What mental health screenings would take place?

International terrorists would be expected, but home-grown alienated persons would also be suspect.

This may seem like a projected movie scenario, but all that is needed is a rogue pilot, or one with mental illness issues to initiate an attack on the Memorial.

What security measures are in force that the facilities where the aircraft are housed?

What scans are conducted on aircraft before flights?

What monitoring is in place at those facilities?

What means of detecting weapons present in the aircraft, including retrofitted drones that might otherwise seem harmless?

I would assume there is an FAA zone of protection (secret) for the Memorial area, but how secure is that zone?

One is concerned that the planning effort is also public with information that would be of interest to potential terrorists..

Given the current historical revisionism at large in the nation, disaffected persons might be easily recruited into conspiracies and radical action.

What resources would be needed for all the measures cited above? where would funding originate.

I realize that the expense to assemble resources necessary to conduct all these security measures would be very high and be cost prohibitive to deploy.

Unfortunately, contactors might seem an alternative, but high-level US security agency personnel would be preferred.

A better solution would be the no-fly alternative, but only the undertaking of classified assessments should make such an evaluation and determination.

Correspondence ID:	260	Project: 97377	Document:	123303
Name:	Sauder, Timothy			
Received:	Oct,06 2022 22:14:37			
Correspondence Type:	Web Form			

Correspondence: Please limit the air traffic to keep the helicopter tourism industry all limited to the same local traffic pattern, to limit competition between the helicopter businesses with low air traffic patterns as to maintain peace for the visitors below. If the air traffic pattern is established with better boundaries, the climbers, and other visitors will find more peace while still maintaining equal competition and opportunity for the helicopter industry.

Correspondence ID:	261	Project: 97377	Document:	123303
Name:	sauder, brianna			
Received:	Oct,06 2022 22:19:01			

Correspondence Type:

Web Form

Correspondence: I am a rock climber and have been climbing in the Black Hills for 12 years. The Rushmore area is excellent for such a sport, as the rock is world-class quality and the low population provides such a serene climbing experience. The last several years I have noticed an increase in noise however, not coming from people but instead from helicopters above. I would highly suggest banning all tour helicopters from the Mount Rushmore Memorial boundary. This would decrease the intrusive noise and allow everyone who is below to enjoy a peaceful time rock climbing, hiking, or otherwise. It is an obvious safety concern for climbers trying to communicate but aside from that, it takes away from the enjoyment of the area. Thank you for your consideration!

Correspondence ID: 262 Project: 97377 Document: 123303

Name: Eisenbeisz, Bennett

Received: Oct,06 2022 23:41:46

Correspondence Type: Web Form

Correspondence: Please ban all helicopter flights over Mount rushmore National Monument, Custer State Park, and Black Elk Wilderness Area. I frequent all of these areas as a hiker, cyclist and climber. In the height of the season the jarring chopping of helicopters can be heard constantly during the day. Just as one starts to fade another is coming into earshot. Any sense of wilderness and natural beauty is spoiled by their loud intrusions. I am constantly hearing from other climbers and hikers how disrupting they find them as well. I believe it is fair to ban them from flying over these areas because they disrupt many more people than the small number that benefit from their flights. A person visiting South Dakota's state parks, national monuments, and especially wilderness areas should not have to listen to helicopters all day long.

Correspondence ID: 263 Project: 97377 Document: 123303

Name: Tippey, Samuel A

Received: Oct,06 2022 23:43:10

Correspondence Type: Web Form

Correspondence: Option one, the do-nothing option, combined with the potential to restrict flights specifically over tribal ceremonies, is the only sensible course of action. While air tours can create noise around the monument, they create far less noise and irritation than any of the many thousands of motorcycles and trucks driving by the monument each year. The minimal noise that they do cause is further offset by the fact that they further the mission of the NPS to teach about the mountain and allow a greater viewing experience for a large variety of people.

Of course, concessions must be made to respect the ceremonies of native peoples in the area. For their sake, restrictions should be allowed on specific days to avoid interference. Otherwise, please continue to allow air tour operations to carry on as before.

Demographics - Demographics Report - PEPC ID: 97377