# **Final EA – Additional Appendix Materials**

# Appendix G – Cultural Resources Consultation and Summary

Concurrence from Bobby Camara

Concurrence from Elizabeth Bell

Concurrence from the Hawai'i Department of Lands and Natural Resources Division of Forestry and Wildlife

Objection from the Hawai'i State Historic Preservation Division (SHPD)

**Objection from John Carse** 

Objection from National Trust for Historic Preservation

Objection from the Office of Hawaiian Affairs (OHA)

**Objection from Kamehameha Schools** 

Objection from the National Parks Conservation Association

Resolution of Objection from OHA

Request for Advisory Council on Historic Preservation's (ACHP) Review of FAA's Finding

ACHP Opinion

FAA's Response to ACHP Opinion

From:	Bobby Camara	
То:	<u>Walker, Judith <faa>; ATMPTeam</faa></u>	
Cc:	Rhonda Loh; Danielle M Foster	
Subject:	HAVO ATMP comments	
Date:	Friday, April 28, 2023 5:21:20 PM	

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Welina mai,

RE Your letter dated March 27, 2023, postmarked April 10, 2023, and received April 14, 2023, about the ATMP for HAVO:

I concur with the Finding of No Adverse Effect on Historic Properties, with reservations.

I understand that proposed regulations only apply to flights up to 5,000 feet AGL. Despite that, we desire that flights respect the limitless airspace above all lands of HAVO as kapu, because if we deem the land, under many circumstances, as kapu and/or sacred, then the limitless airspace above, and all lands into the earth below must also be deemed kapu and/or sacred. I urge officials to better understand concerns fervently expressed by those with cultural understandings and expertise, and amend laws and regulations to reflect those concerns.

I am pleased that the outcome of many many sometimes frustrating years of meetings, research, and information sharing has resulted in limiting flights over HAVO. I hope that similar processes at other areas will proceed much more expeditiously, and with greater understanding for, and appreciation of, Native cultural practices. Those Native practices have histories spanning many many hundreds and sometimes thousands of years, and MUST be recognized at the outset of any planning efforts.

Mahalo for your work.

Bobby Camara, HAVO Kupuna, and Retired employee HC3 Box 4696 Keaau HI 96749 (808) 557-5720

From:	ebell@hawaii.rr.com	
То:	<u>Walker, Judith <faa></faa></u>	
Cc:	<u>ATMPTeam</u>	
Subject:	ATMP - Hawai'i Volcanoes National Park (HAVO)	
Date:	Saturday, April 29, 2023 12:00:36 AM	

**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.

Aloha,

I concur with the Finding of No Adverse Effect on Historic Properties, with much uncertainty and sadness. Airspace above this national park must be respected and held sacred and <u>no</u> <u>aircraft</u> be allowed anywhere and anytime.

Mahalo.

Elizabeth Bell, HAVO Kupuna and Retired employee P O Box 89 Hawaii National Park HI 96718 (808) 895-7059 JOSH GREEN, M.D. GOVERNOR | KE KIA'ĂINA

SYLVIA LUKE LIEUTENANT GOVERNOR | KA HOPE KIA'ÄINA





STATE OF HAWAI'I | KA MOKU'ĀINA 'O HAWAI'I DEPARTMENT OF LAND AND NATURAL RESOURCES KA 'OIHANA KUMUWAIWAI 'ĀINA

> DIVISION OF FORESTRY AND WILDLIFE 19 EAST KAWILI STREET HILO, HI 96720

DAWN N.S. CHANG CHAIRPERSON BOARD OF LAND AND NATURAL RESOURCES COMMISSION ON WATER RESOURCE MANAGEMENT

> LAURA H.E. KAAKUA FIRST DEPUTY

M. KALEO MANUEL DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES BOATING AND OCEAN RECREATION BUREAU OF CONVEYANCES COMISSION ON WATER RESOURCE MANAGEMENT CONSERVATION AND COASTAL LANDS CONSERVATION AND RESOURCES ENFORCEMENT ENGIREERING FORESTRY AND WILDLIFE HISTORIC PRESERVATION KAHOOLAWE ISLAND RESERVE COMMISSION LAND STATE PARKS

March 28, 2023

TO: Judith Walker, Federal Preservation Officer, Senior Environmental Policy Analyst Environmental Policy Division (AEE-400), Federal Aviation Administration
 FROM: Steven Bergfeld, Hawai'i Island Branch Manager SS Hawai'i Department of Land and Natural Resources, Division of Forestry and Wildlife
 SUBJECT: 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 Hawai'i Volcanoes National Park (HICRIS Project 2022PR00353)

Thank you for the opportunity to comment on the subject Finding of No Adverse Effect for the Air Tour Management Plan for Hawai'i Volcanoes National Park. We are writing in response to your request to review this Plan and we would like to **concur** with the plan's findings.

Hawai'i Volcanoes National Park has always been a strong partner in the conservation of sensitive ecosystems, endangered species, and historically significant sites on Hawai'i Island. This plan aligns with our program goals on adjacent lands managed by the Division of Forestry and Wildlife.

Again, thank you for the opportunity to review your Finding of No Adverse Effect for the Air Tour Management Plan for Hawai'i Volcanoes National Park. Feel free to reach out to us for further information or assistance.

JOSH GREEN, M.D. GOVERNOR | KE KOA'AINA SYLVIA LUKE LIEUTENANT GOVERNOR | KA HOPE KIA'AINA





DAWN N. S. CHANG CHARPERSON BOARD OF LAND AND NATURAL RESOURCES OMMISSION ON WATER RESOURCE MANAGEMENT

> LAURA H.E. KAAKUA FIRST INPITY

M. KALEO MANUEL DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES BOATING AND OCEAN RECREATION BUREAU OF CONVEYANCES COMMESSION ON WATER RESOURCE MANAGEMENT CONSERVATION AND COASTAL LANDS CONSERVATION AND RESOURCES ENFORCEMENT ENGINEERING FORESTRY AND WILDLIFE HISTORIC PRESERVATION KAHOOLAWE ELAND RESERVE COMMISSION LAND STATE PARKS

#### STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAI'I DEPARTMENT OF LAND AND NATURAL RESOURCES

STATE HISTORIC PRESERVATION DIVISION KAKUHIHEWA BUILDING 601 KAMOKILA BLVD, STE 555 KAPOLEI, HAWAII 96707

July 26, 2023

Judith Walker Federal Preservation Officer Senior Environmental Policy Analyst Environmental Policy Division (AEE-400) Federal Aviation Administration Email Reply to: judith.walker@faa.gov

Rachel Mangum Program Analyst Advisory Council on Historic Preservation 401 F Street NW, Suite 308 Washington, D.C. 20001 Email Reply to: <u>rmangum@achp.gov</u>

Electronic Transmittal Only, No Hard Copy to Follow

Dear Judith Walker and Rachel Mangum:

SUBJECT: National Historic Preservation Act (NHPA) Section 106 Review – Continued Consultation Air Tour Management Plan for Hawai'i Volcanoes National Park Humu'ula, Kahue, Kealakomo, Lae'apuki, Pānaui-iki, 'Āpua, Poupou 1-2, Pūlama, Pānauinui, Kamoamoa, Kahauale'a, Kaulanamauna, Kapu'a, Anapuka, Ho'opūloa, Pāpā 1, Pāpā 2, 'Alikā, Kīpahoehoe, Ka'apuna, 'Ōla'a, Kea'au, Kī'ao, Kamā'oa, Pu'u'eo, Ke, Pākiniiki, Pākininui, Pu'ulena, Waiomao, Kiolaka'a, Pu'umaka'ā, Manukā, Wai'ōhinu, Ka'alāiki, Hi'ona'ā, Pā'au'au 1, Palima, Halelua, Wailoa, Kumu, Keaīwa, Pā'au'au 2, Ka'ala'ala, Kanaio, Wailau, Nīnole, Ka'a, Kahuku, Kapāpala, Keauhou, Ka'ohe Mauka, Ki'ilae, Keālia 1, and Keauhou 2 Ahupua'a North Hilo, Puna, North Kona, South Kona, Ka'ū, and Hāmākua Districts, Island of Hawai'i TMK: (3) various

On March 27, 2023, the State Historic Preservation Division (SHPD) received a letter dated March 27, 2023 from the U.S. Department of Transportation, Federal Aviation Administration (FAA) to continue the Section 106 historic preservation process and to request the State Historic Preservation Officer's (SHPO's) concurrence with the effect determination for the Development of an Air Tour Management Plan for Hawai'i Volcanoes National Park on the island of Hawai'i (HICRIS Submission No. 2021PR00353.009). Included within the FAA's letter was an invitation to a Section 106 consultation meeting to be held April 18, 2023 "to explain how the FAA arrived at the proposed finding of no adverse effect on historic properties." The SHPO responded in a letter dated April 20, 2023 stating:

To reach a determination of concurrence with the proposed effect determination, the SHPO must take into consideration the information, and any consulting party comments, received during the consulting party meeting proposed to be held on April 18, 2023 by the FAA. The receipt of additional information restarts the SHPO's Section 106 review timeline. Therefore, the SHPO will review and comment on the

IN REPLY REFER TO: Project No.: 2021PR00353

Doc No.: 2307SH10

Archaeology

Architecture

submission received March 27th subsequent to the consultation meeting. Further, per 36 CFR 800.11(e)(6), please submit to SHPD any comments received from consulting parties or the public regarding the information and findings provided in the March  $27^{th}$  letter.

Subsequent to the April meeting, the FAA continued to hold consultation meetings with consulting parties, the most recent held on July 20, 2023. These meetings were limited to consulting parties who provided written objections. The SHPD and other consulting parties opposed the FAA's exclusion of certain parties from consultation via email and verbal communication. Written objections were filed, at minimum, by the Office of Hawaiian Affairs, Historic Hawai'i Foundation, the National Trust for Historic Preservation, and the National Parks Conservation Association.

A letter from FAA dated April 28, 2023, requesting the SHPO's concurrence with the FAA's effect determination states:

Summaries of public input received to date have been included in the March 27, 2023 letter. The SHPD has already received consulting party comments and the agency responses to the consulting party meeting held Nov. 21, 2022. The agency held an informational meeting on April 18, 2023. The purpose of the informational meeting was to explain the assessment of effects for the undertaking and the proposed finding of no adverse effects. Consequently, the agency did not accept comments on the proposed finding at the meeting. Consulting parties were invited to provide written responses to the finding of effects letter. The agency will also be requesting public input through the environmental review process. The public review period will commence in May.

To allow sufficient time to hear the objections raised by consulting parties, the FAA and NPS met independently with consulting parties throughout the month of July 2023. SHPD staff have notified the FAA that the SHPO awaits copies or summaries of any comments provided by consulting parties and the public, to date, accompanied by an account for how the FAA considered the comments and objections received in reaching their effect determination and documentation of whether/how objections were resolved. The SHPO requires this information be submitted prior to completing our review of the FAA's proposed effect determination. However, FAA has decided that their next step will be to appeal to the Advisory Council on Historic Preservation and foreclose the SHPO's opportunity to finalize our comments.

SHPD staff have participated in consultation for the proposed undertaking and have considered the comments and concerns raised by consulting parties, namely Native Hawaiian Organizations (NHOs), despite having an incomplete submittal from FAA. Among the concerns raised is the impact the air tours will have on traditional cultural properties (TCPs) and on-going traditional cultural practices. As FAA has pointed out, the undertaking has the potential to adversely affect setting and feeling of historic properties.

Based on the information provided by FAA, and comments provided by consulting parties, the SHPO does not concur with FAA's determination that the proposed Air Tour Management Plan will have no adverse effect on historic properties. The SHPO has determined that the proposed plan will result in an adverse effect to TCPs and traditional cultural practices.

Despite holding numerous consultation meetings, FAA has not made a good faith effort to consult, rather they have only moved through the motions to comply with the four-step process and 36 CFR § 800. The FAA has not taken into consideration how the air tour management plan could be amended to avoid, minimize, or mitigate effects to historic properties, nor have they amended their determination of effect to consider these effects, which have been raised by the SHPO and consulting parties throughout the consultation meetings including those held recently as referenced above.

Federal agencies are required to avoid, minimize, or mitigate adverse effects. Please note that if the federal agency and the SHPO concur that the adverse effect cannot be avoided, the Section 106 process will not conclude until the consultation process is complete, an MOA is developed, executed, and implemented, and if applicable, the formal comments of the Advisory Council on Historic Preservation have been received, pursuant to 36 CFR § 800.6.

Please submit any forthcoming information and correspondence related to the subject project to SHPD via HICRIS under Project No. 2021PR00353 using the Project Supplement option.

Judith Walker July 26, 2023 Page 3

The SHPD looks forward to continuing the Section 106 process for the proposed project.

The FAA and the National Park Service (NPS) are the offices of record for this undertaking. Please maintain a copy of this letter with your environmental review record for this undertaking.

For matters related to the identification of historic places, architectural resources, or the built environment please contact Jessica Puff, Architecture Branch Chief, at (808) 462-3083 or at <u>Jessica.Puff@hawaii.gov</u>. Please contact Stephanie Hacker, Historic Preservation Archaeologist IV, at <u>Stephanie.Hacker@hawaii.gov</u> or at (808) 692-8046 for matters regarding archaeological resources or this letter.

Aloha, Alan Downer

Alan S. Downer, PhD Administrator, State Historic Preservation Division Deputy State Historic Preservation Officer

cc: ATMPTeam@dot.gov

achp@achp.gov Summer Roper Todd, NPS (summer\_roper\_todd@nps.gov) Shauna Haas, US DOT (shauna.haas@dot.gov) Kathering Giraldo, US DOT (k.giraldo@dot.gov) Amy Hootman, US DOT (amy.hootman@dot.gov) Lindsay Moore, NPS (lindsay\_moore@nps.gov) Jessica Puff, SHPD (jessica.puff@hawaii.gov) Sean Naleimaile, SHPD (sean.p.naleimaile@hawaii.gov)

3

From:	<u>John Carse</u>	
To:	<u>Walker, Judith <faa></faa></u>	
Cc:	<u>ATMPTeam</u>	
Subject:	Section 106 Comments	
Date:	Friday, April 28, 2023 8:55:50 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.

#### Dear ATMP Team Members,

I do not concur with the Federal Aviation Administration's finding that the proposed Air Tour Management Plan for Hawai'i Volcanoes National Park will have no adverse effects on historic properties. I feel the FAA's Section 106 conclusions have ignored the community's concerns and questions regarding the air tour nuisance problem in the park and surrounding neighborhoods.

Implementation of the plan presented will clearly effect historic areas outside of the park boundaries, which the ATMP is required to consider according to 40 Code of Federal Regulations, Section 1508.8. Why does this plan continue to ignore this rule that both the FAA and NPS have been made aware of? Just citing the definition of air tours and the specific regions mentioned in the Air Tour Management Act of 2000 does not relieve the FAA from the responsibility of obeying federal NEPA regulations concerning indirect effects.

Also, all the lists, routes, rules, and regulations in the world are worthless without monitoring and enforcement. This was pointed out to the NPS and FAA by the Government Accountability Office back in 2006 after an audit of the ATMP for HVNP that is still under development. When asked about this in 2010, FAA ATMP Administrator Keith Lusk wrote: "We are not that far along in the development of the air tour management plan for Hawaii Volcanoes National Park to provide any specifics regarding your question about possible monitoring methods." Now, thirteen years later, this obvious flaw in the ATMP and Section 106 documents still has not been addressed. And this is despite the facts that both the FAA and NPS have been made aware that the FAA's recently installed, state-of-the-art, ADS-B tracking system does not function over many of the historic properties listed and that the NPS has no flight tracking equipment.

I am also very concerned that no videos of the recent Section 106 Zoom meetings are made available to the public, despite that being the standard procedure for all other government agencies. A review of the November 12, 2022 consulting party meeting would show, if it were available, that many Native Hawaiian elders -- whose ancestors have been here for over 40 generations -- felt that there should be absolutely no air tours over the park, while the vast majority of air tour operation owners -- who have only been profiting from this destruction of the park for a bit over two decades -- are Caucasian males. How can allowing these extremely noisy and disruptive businesses to continue polluting our precious island environment be considered anything but the codification of white colonial imperialism into the HVNP regulations for perpetuity?

Please take the time to consider these comments.

Aloha, John Carse



April 28, 2023

Judith Walker Federal Preservation Officer Federal Aviation Administration U.S. Department of Transportation Office of Policy, International Affairs & Environment Office of Environment and Energy 800 Independence Ave. SW, Suite 900 West Washington D.C. 20591

Sent via email to: judith.walker@faa.gov and ATMPTeam@dot.gov

# Re: Comments on Proposed Finding of No Adverse Effect Hawai'i Volcanoes National Park Air Tour Management Plan

Dear Ms. Walker,

The National Trust for Historic Preservation ("National Trust") appreciates this opportunity to comment on the Hawaii Volcanoes National Park Air Tour Management Plan ("ATMP") pursuant to Section 106 of the National Historic Preservation Act ("NHPA") and 36 C.F.R. §§ 800.2(c)(5) and 800.3(f)(3). We have previously expressed our support for the comments and concerns raised by the Historic Hawai'i Foundation in their December 1, 2022 letter, and that many of those concerns remain unaddressed. We also support the comments that have been raised by the Office of Hawaiian Affairs. We encourage the FAA to more directly address these concerns, as well as those raised by the Native Hawaiian organizations and individuals who have participated in this consultation.

This letter responds to the proposed finding of no adverse effect by the Federal Aviation Administration ("FAA") for this undertaking, and to the discussion at the April 18, 2023 consulting parties meeting. The National Trust disagrees with the FAA's proposed finding of no adverse effect, pursuant to 36 C.F.R. § 800.5(c)(2)(i). In our view, this undertaking will indeed have adverse effects upon historic properties, and the majority of the other consulting parties obviously agree that adverse effects will occur. We believe the FAA's proposed finding is based on an erroneous interpretation of relevant law.

During the April 18, 2023 consulting parties meeting, the FAA's representative stated that the proposed finding of no adverse effect was based on a comparison of future air tour operations under the new ATMP versus current air tour operations. The FAA's representative stated that, since the undertaking does not propose to increase existing adverse effects to historic properties, the undertaking merits a finding of no adverse effect. This represents a fundamental misstatement of the scope of this undertaking and of the FAA's statutory responsibility to evaluate adverse effects under Section 106 of the NHPA.

This undertaking is being developed pursuant to the National Parks Air Tour Management Act of 2000 (Pub. L. 106-181) and its implementing regulations contained in 14 C.F.R. Part 136. Nowhere in either the statute or the regulations are ATMPs required to permit existing adverse effects. The development of this ATMP is instead a *de novo* evaluation of appropriate air tour uses within Hawaii Volcanoes National Park. It is an exercise of federal jurisdiction and management authority. There is thus no baseline that is required to be accepted in the Section 106 process, and *all* adverse effects resulting from this undertaking must be taken into account.

Indeed, the FAA has the authority to prohibit air tours within Hawaii Volcanoes National Park. The National Trust has previously communicated our preference for that result ("Alternative 2") in connection with the National Environmental Protection Act review for this project, as it would truly avoid or minimize adverse effects.<sup>1</sup> If the FAA instead adopts an ATMP that allows air tours, a finding of adverse effects is appropriate in connection with the Section 106 review of this undertaking.

The National Trust specifically asserts that the permitting of air tours within Hawaii Volcanoes National Park would cause adverse effects by diminishing the "setting … feeling, or association" of the park's historic resources per 36 C.F.R. § 800.5(a)(1). Air tours within the park also result in an "[I]ntroduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features;" per 36 C.F.R. § 800.5(a)(2)(v).

During the April 18, 2023 consulting parties meeting, the FAA did not explicitly dispute that air tours cause adverse effects to historic properties within the Hawaii Volcanoes National Park. Rather, the FAA's position that this undertaking will have no adverse effects seemed primarily based on the argument that it would not result in an overall increase to existing adverse effects, and under some metrics, existing adverse effects would be reduced. As we stated during the consultation meeting, this represents a failure to consider *cumulative* impacts. The Section 106 regulations explicitly require the consideration of "reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be *cumulative*." 36 C.F.R. § 800.5(a)(1) (emphasis added). And cumulative effects are defined to include "past" effects:

Cumulative effects . . . result from the incremental effects of the action when added to the effects of other *past*, present, and reasonably foreseeable actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative effects can result from individually minor but collectively significant actions taking place over a period of time.

40 C.F.R. § 1508.1(g)(3) (emphasis added).

The National Trust remains concerned about the potential precedent that an agency

<sup>&</sup>lt;sup>1</sup> Comments submitted digitally on April 1, 2022.

management plan or decision explicitly authorizing adverse effects could be deemed allegedly *not* adverse, simply because the authorized adverse effects are not as severe as they used to be, when the agency has the authority to prohibit the adverse effects. Accordingly, we urge the FAA to revise its proposed finding of effect to reflect the reality that the undertaking as currently proposed would result in cumulative adverse effects to historic properties. In the absence of a revised finding, it will be necessary for the FAA to refer this disagreement to the ACHP, pursuant to 36 C.F.R. § 800.5(c)(2)-(3), given the widespread opposition to the finding among the consulting parties.

Thank you for your consideration of our comments, and we look forward to continuing to participate in this Section 106 consultation.

Sincerely,

Eljabeth Merrit

Elizabeth S. Merritt Deputy General Counsel

bis ( och

Chris Cody Associate General Counsel

cc: Rachel Mangum and Jaime Loichinger, ACHP Rhonda Loh, NPS Superintendent, HAVO Summer Roper Todd, NPS Archaeologist Alan Downer, Jessica Puff, Stephanie Hacker, and Susan Lebo Hawaii State Historic Preservation Office Kamakana Ferreira, OHA Kiersten Faulkner, Historic Hawai'i Foundation



STATE OF HAWAI'I OFFICE OF HAWAIIAN AFFAIRS 560 N. NIMITZ HWY., SUITE 200 HONOLULU, HAWAI'I 96817

April 20, 2023

Judith Walker Federal Preservation Officer Federal Aviation Administration 800 Independence Ave Washington, DC 20591

Re: National Parks Air Tour Management Plan for Hawai'i Volcanoes National Park NHPA Section 106, Continuing Consultation and Finding of No Adverse Effect Kapāpala and Keahou Ahupua'a, Ka'u Moku, Hawai'i Mokupuni Tax Map Keys: (3) 9-9-001:001; 9-8-001:001; 1-1-004:003, 020, 034; and, 1-1-001:012

Aloha e Ms. Walker:

The Office of Hawaiian Affairs (OHA) is in receipt of your March 27, 2023, letter continuing National Historical Preservation Act (NHPA) Section 106 consultation and providing a Finding of No Adverse Effect for the Hawai'i Volcanoes National Park (HAVO) Air Tour Management Plan (ATMP). The Federal Aviation Administration (FAA) is preparing this ATMP in cooperation with the National Park Service (NPS) for all commercial air tours flown at or below 5,000 feet above ground and within a half mile of the HAVO park boundaries. Absent an ATMP, commercial air tour flights over HAVO would continue virtually unrestricted under the FAA's Interim Operating Authority (IOA) with no limits on flight routes, altitudes, or times of day. Consultation was first initiated in March 2021 via a letter from the FAA, with various virtual meetings and updates occurring between October 2021 and present.

The current letter indicates that Alternative 4 has been selected as the preferred alternative and that there would be no adverse effect to historic properties from its implementation. This alternative would include three main flight routes (Kahuku, Coastal, Pu'u ' $\bar{o}$ ' $\bar{o}$ ) with set flight times between 10AM to 2PM for non-quiet tech flights and 9AM to 5PM for quiet-tech (QT) flights. Sundays would be designated as no-fly days, whereas Wednesdays would allow only QT type flights during permitted hours. A mandatory 5 miles standoff distance would be implemented for cultural events, with at least a 2 monthsnotice provided to operators. The FAA argues that implementation of Alternative 4 would reduce existing air traffic by at least 86%, minimizing flights from an annual average of 11,376 to 1,565. Further, the *Noise Technical Analysis* conducted by the FAA establishes specific noise level decibel thresholds that would interrupt the outdoor experience and interpretive programs. It is believed that the implementation of QT flights per the ATMP

Judith Walker, Federal Aviation Administration ATMP for Hawai'i Volcanoes National Park, Re: Finding of No Adverse Effect April 20, 2023 Page **2** of **4** 

would keep noise within these thresholds and greatly reduce existing aircraft related noise. Soundscape monitoring would be conducted by NPS to ensure thresholds are met.

#### **Background on OHA Section 106 Involvement**

Previously, OHA participated in NHPA Section 106 consultations for the ATMP and did submit formal comments on January 5, 2022. We were alerted about the ATMP from concerned beneficiaries who believed air tours in the area were disrupting and endangering their cultural practices. As noted in our letter, we detailed that a helicopter enroute to HAVO crashed on OHA property within the Wao Kele o Puna forest reserve in March 2020. Other consulting parties had reported another crash in a residential area near HAVO. Given these concerns, we recommended specific trainings be implemented for pilots, establishment of a sterile cockpit during air tours, and enhanced aircraft maintenance protocols.

Our letter also strongly recommended that a traditional cultural property (TCP) study be done to better understand cultural resources within the park and to ensure that adequate vertical buffers were implanted to protect cultural practitioners and the cultural landscape. Throughout the Section 106 consultation process, many park visitors, Native Hawaiian beneficiaries, and the Kupuna Council (cultural advisors to HAVO) consistently advocated against commercial air tours due to adverse effects caused by low flying commercial flights on the use and serenity of the vast cultural landscape present within HAVO boundaries. Further, the Kupuna Council believes that Kīlauea is sacred and has requested a no-fly zone for decades.

Additionally, a formal letter was provided to the FAA by OHA on March 30, 2022, indicating a preference for Alternative 2, which would have restricted all commercial air tours below 5,000 ft. We further suggested that should Alternative 4 be retained for consideration, that it be refined to add no-fly days on Sundays, restrict flights during cultural events, require mandatory interpretive training for pilots, add explicit noise thresholds, and provide monitoring methods for QT flights.

# **OHA Comments on FAA Finding of No Adverse Effect**

OHA certainly acknowledges that the current preferred Alternative would indeed greatly reduce the number of flights occurring per year and that many of our suggestions have been incorporated into the ATMP elements. However, we believe, the determination of no adverse effect is still premature as it is solely based on improving current flight conditions without a full understanding of the cultural resources within HAVO. Since our initial comments, it has been our stance that absent the completion of a TCP study, the FAA may not be able to fully grasp the adverse effects on cultural resources. Judith Walker, Federal Aviation Administration ATMP for Hawai'i Volcanoes National Park, Re: Finding of No Adverse Effect April 20, 2023 Page **3** of **4** 

It is OHA's understanding that NPS is actually working on completing a TCP pursuant to a Programmatic Agreement condition for HAVO's Disaster Recovery project. In fact, we were provided with an early draft of part 1 of the TCP on December 1, 2022, and participated in an NPS TCP consultation meeting on February 3, 2023. The direction and completion of the study was well supported by the Kupuna Council and the Advisory Council on Historic Preservation (ACHP). It appeared to OHA that a more complete draft would be available by July or August of 2023.

The FAA letter fails to acknowledge the ongoing effort to complete a TCP or even the utility of completing one. OHA maintains that a TCP study be done first prior to issuing an adverse effect determination and that appropriate vertical buffers be established given the abundance of cultural concerns presented during Section 106 consultations. <u>It is simply</u> not enough to reduce the current number of flights without fully understanding the cultural needs of the Native Hawaiian people and cultural resources within HAVO. Considering NPS's current efforts on the TCP and respective timeline, it would arguably appear that proceeding with the ATMP determination absent evaluation of the TCP study materials would be rushed and poorly informed.

Further, it would appear that OHA's suggestions for improved pilot training accountability and aircraft maintenance have been ignored. In regard to pilot training, we noted that the FAA revised their Operations Specification (OPSS) B048 and Letter of Authorization (LOA) B548 to require cue-based training for air tour operations. Thus, we recommended that the updated cue-based training records be provided to NPS HAVO staff and the Kupuna Advisory Council as part of annual safety meetings. As Alternative 4 does include a provision for semi-annual reports to be provided to NPS for altitude monitoring, it would not seem overly onerous to OHA to include records of cue-based pilot training as well within these semi-annual reports.

In regards to aircraft maintenance, we expressed concern over the impact of volcanic ash, sulfur, and even salt air on aircraft engines and airframes. The FAA does in fact acknowledge the potential dangers of volcanic ash on aircraft operation and safety.<sup>1</sup> Based on recommendations from aircraft manufacturer Pratt & Whitney<sup>2</sup>, some of these effects can be greatly minimized through more frequent checks for corrosion, daily desalination rinses for aircraft turbine engines, and engine borescope inspections during every fuel nozzle. Its further OHA's understanding that many air carriers (e.g., Corporate Air, Transair, Blue Hawaiian Helicopters) operating turboprop engines in Hawai'i do in fact include these additional maintenance tasks to improve flight safety and aircraft performance. Thus, we still implore the FAA to consider these additional maintenance actions as requirements for air tour operators operating within HAVO under an ATMP. Arguably, while this requirement may not make intuitive sense for other National parks, it

<sup>&</sup>lt;sup>1</sup> See FAA Order 8900.1 Volume 3, Chapter 26, Section 7.

<sup>&</sup>lt;sup>2</sup> See aircraft engine manufacturer Pratt & Whitney's "4 Maintenance Best Practices for Preventing Salt Air Corrosion" - <u>https://www.pwc.ca/en/airtime-blog/articles/technical-tips/4-maintenance-best-practices-for-preventing-salt-air-corrosion</u>

Judith Walker, Federal Aviation Administration ATMP for Hawai'i Volcanoes National Park, Re: Finding of No Adverse Effect April 20, 2023 Page **4** of **4** 

seems especially relevant considering that the area is a volcano park with active volcanoes in a salt air environment.

# **Closing Remarks**

Mahalo for the opportunity to comment. OHA looks forward to continuing consultation and seeing that the FAA fully considers are recommendations. Should you have any questions, please contact OHA's Lead Compliance Specialist, Kamakana C. Ferreira at (808) 594-0227 or by email at kamakanaf@oha.org.

'O wau iho nō me ka 'oia 'i'o,



Sylvia M. Hussey, Ed.D. Ka Pouhana, Chief Executive Officer

SH:kf

CC: Rhonda Loh, Super Intendant, Hawai'i Volcanoes National Park Mililani Trask, OHA Hawai'i Island Trustee



April 27, 2023

Judith Walker Federal Preservation Officer Senior Environmental Policy Analyst Environmental Policy Division Federal Aviation Administration Via email: Judith.Walker@faa.gov and ATMPTeam@dot.gov

# Subject: Proposed Area of Potential Effect under Section 106 of the National Historic Preservation Act for the Development of an Air Tour Management Plan for Hawai`i Volcanoes National Park

Aloha Ms. Walker:

The Federal Aviation Administration (FAA), in coordination with the National Park Service (NPS) has initiated and is continuing consultation under Section 106 of the National Historic Preservation Act (NHPA) for the development of an Air Tour Management Plan (ATMP) for Hawai'i Volcanoes National Park (HVNP). This proposed undertaking will require commercial air tour operators to fly on three designated routes over HVNP and within ½ mile of its boundary (the ATMP planning area) as authorized by the National Park Air Tours Management Act.

Kamehameha Schools requests that the proposed Area of Potential Effect (APE) should be revised and expanded further north of Kīlauea Crater to encompass an appropriate area within which the undertaking may directly or indirectly cause alterations in the character and use of historic properties. Because we are requesting that the proposed APE be revised and expanded, we do not concur with your no adverse effect determination at this time.

# Introduction

Kamehameha Schools is a private trust established by Ke Ali'i Bernice Pauahi Bishop, the great granddaughter and last royal descendent of Kamehameha I. Our mission is to create educational opportunities in perpetuity to improve the capability and well-being of people of Hawaiian ancestry.

KS approach to its 'āina portfolio is through culturally-rooted stewardship of its real estate portfolio of 'Āina Pauahi (KS lands). This includes the stewardship of a diverse real estate portfolio of approximately 365,000 acres of land in the State of Hawai'i. Through culturally-rooted stewardship, our organization believes the outcomes we will see include *Waiwai* (wealth, prosperity), *Lawa Kūpono* (sustainability), and *Honua Ola* (well-being) to build resilient communities across Hawai'i for the betterment of our Lāhui (Native Hawaiian community).

KS has actively managed 'Āina Pauahi for native ecosystem health and well-being, cultural landscape restoration and stewardship including the lands of Keauhou, Ka'ū near the proposed undertaking.

Judith Walker Federal Preservation Officer April 27, 2023 Page 2 of 2

# Proposed Area of Potential Effect (APE)

The initial APE delineated by the FAA and NPS consisted of HVNP and a ½-mile boundary around it. The proposed APE was expanded to also include a small portion of our Keauhou, Ka'ū lands north of Kīlauea Crater and southwest of the 'Ōla'a Forest tract.

# Request to Revise and Expand Proposed APE

In your February 21, 2023 letter to consulting parties the FAA recognized *that ...it is reasonably foreseeable that operators would fly just outside of the ATMP planning area surrounding the volcanoes in order to view Kīlauea crater...* and.*..implementation of the ATMP may result in more flights in this area as they may be able to hover and view the crater...* These are critical points that Kamehameha Schools strongly agrees with. Thousands of students annually participate in educational programs that are based on our lands to the immediate north of Kīlauea Crater. These lands also house the Keauhou Bird Conservation Center, one of only two propagation facilities for endangered Hawaiian birds, including the 'alalā. Increased flights and prolonged hovering will potentially introduce audible and visual elements that may adversely impact our on-going educational programs, endangered species recovery and native ecosystem restoration, cultural practices, and historic properties on our Keauhou, Ka'ū lands.

We believe the impact of increased flights and tour operators hovering outside of the ATMP planning area north of Kīlauea Crater has not been fully analyzed. Because the current analysis supposes that there will be no increased flights or hovering in this area, impact to the adjacent ATMP planning area is unknown and that analysis is incomplete. Expanding the APE will allow for additional efforts to identify historic properties, a complete assessment of direct and indirect effects and the development of appropriate mitigation measures.

Thank you for the opportunity to provide comments. We look forward to continuing consultation with the FAA, NPS and all other parties.

Please contact me with any questions at <u>belindse@ksbe.edu.</u>

Mahalo,

Keola Lindsey

Keola Lindsey Senior Project Manager, Natural and Cultural Ecosystems Kamehameha Schools

From:	Neal Desai
То:	ATMPTeam
	Walker, Judith <faa>; Ward, Vicki L; Haas, Shauna (Volpe); Trevino, Karen; Hodara Nelson, Rachel; sarah killinger@nps.gov; summer roper todd@nps.gov; Jackson-Retondo, Elaine</faa>
Subject:	NPCA Objection to Proposed Findings for Haleakalā National Park and Hawai'i Volcanoes National Park
Date:	Tuesday, July 11, 2023 12:24:07 AM
Attachments:	Final Air tour letter from NPCA and NTHP - HAVO and HALE 6-20-2023.pdf

**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.

# FAA:

This email letter follows up on our discussion on Friday July 7, 2023, where the National Parks Conservation Association (NPCA) expressed our objection to the proposed Finding of No Adverse Effect for both Haleakala and Hawaii Volcanoes National Parks. Per your prompt inquiring if NPCA would be submitting an objection in writing, we write here to do that.

Despite consultation with Native Hawaiian Organizations, Kupuna, and others highlighting that allowing even a reduced level of air tours, as proposed in the undertaking, would not sufficiently mitigate the impacts to traditional, ceremonial, cultural, and religious use and connection to the Park, the FAA decided to find No Adverse Effects for both parks. This finding is factually incorrect. NPCA agrees with commentors, for the reasons they have outlined and which are referenced in the proposed Finding, that adverse effects will be present under the proposed undertaking. NPCA's NEPA comment letter, which speaks to acoustical data and analyses found within the proposed Findings for both parks and is attached here, also explains why there would be adverse effects in both parks under the proposed undertakings.

Thank you, Neal

\_\_\_\_\_

# Neal Desai

Senior Program Director, Pacific Region | National Parks Conservation Association Mobile: 510.368.0845 |<u>ndesai@npca.org</u> (Pronouns: he/him/his)

# Preserving Our Past. Protecting Our Future.

Speak up for national parks. Join us at npca.org

From: ATMPTeam <ATMPTeam@dot.gov>

**Sent:** Friday, July 7, 2023 2:49 PM

**To:** ATMPTeam <ATMPTeam@dot.gov>

**Cc:** Walker, Judith <FAA> <judith.walker@faa.gov>; Ward, Vicki L <vicki\_ward@nps.gov>; Haas, Shauna (Volpe) <shauna.haas@dot.gov>; Trevino, Karen <Karen\_Trevino@nps.gov>; Hodara Nelson,

Rachel <Rachel\_Hodara@nps.gov>; sarah\_killinger@nps.gov; summer\_roper\_todd@nps.gov; Jackson-Retondo, Elaine <Elaine\_Jackson-Retondo@nps.gov>

**Subject:** FAA/NPS Section 106 Meeting for Haleakalā National Park and Hawai'i Volcanoes National Park

Greetings,

The Federal Aviation Administration (FAA) and the National Park Service (NPS) are scheduling a meeting to report back to the objecting parties on next steps in the Section 106 process for the development of Air Tour Management Plans (ATMP) for Haleakalā National Park and Hawai'i Volcanoes National Park. The meeting is scheduled for 10 am HT on Tuesday, July 11, 2023. A calendar file is attached for your use.

Connection information for the meeting is included below. Should you have any questions, please contact me at (202) 267–4185 or at judith.walker@faa.gov, copying ATMPTeam@dot.gov. If you have any logistical issues accessing the meeting, please reach out to ATMPTeam@dot.gov or 857-998-3008.

Best regards, Judith Walker

# Join ZoomGov Meeting https://usdot.zoomgov.com/j/1614943096?pwd=dTl3Mmlqd1NhTW5NSlJJZjZrWmsrZz09 Meeting ID: 161 494 3096 Passcode: 285809 One tap mobile +16692545252,,1614943096#,,,,\*285809# US (San Jose) +16468287666,,1614943096#,,,,\*285809# US (New York) Dial by your location +1 669 254 5252 US (San Jose) +1 646 828 7666 US (New York) +1 646 964 1167 US (US Spanish Line) +1 669 216 1590 US (San Jose) +1 415 449 4000 US (US Spanish Line) +1 551 285 1373 US Meeting ID: 161 494 3096 Passcode: 285809 Find your local number: <u>https://usdot.zoomgov.com/u/ad7vRCPB47</u> Join by SIP 1614943096@sip.zoomgov.com Join by H.323 161.199.138.10 (US West) 161.199.136.10 (US East) Meeting ID: 161 494 3096 Passcode: 285809





June 20, 2023

National Park Service and Federation Aviation Administration c/o Volpe National Transportation Systems Center Kaitlyn Rimol, V-326 Attn: HAVO/HALE ATMPs 55 Broadway Cambridge, MA 02142

Re: Opposition to the preferred alternatives (Alternative 3) in the Air Tour Management Plans for Hawai'i Volcanoes and Haleakala National Parks

Dear NPS Director Chuck Sams and FAA Administrator Billy Nolen:

On behalf of the National Parks Conservation Association and the National Trust for Historic Preservation, and our nearly 2.6 million members and supporters nationwide, we submit these comments on the Air Tour Management Plans (ATMP) for Hawai'i Volcanoes and Haleakala National Parks.

Since 1919, National Parks Conservation Association (NPCA) has been the leading voice of the American people in protecting and enhancing our National Park System. The National Trust for Historic Preservation in the United States is a private nonprofit organization chartered by Congress in 1949 to "facilitate public participation" in the preservation of our nation's heritage, and to further the historic preservation policy of the United States.

We believe the National Park Service (NPS) and Federal Aviation Administration's (FAA) should have prohibited air tours in both parks in order to protect natural sounds, visitor experiences, Indigenous sacred sites and ceremonial areas, natural and cultural resources, wildlife, and wilderness resources and values. We assert the preferred alternatives allowing commercial air tours 1) result in unacceptable impacts to the aforementioned resources and people and 2) do not support the management objectives of the parks.

The agencies incorrectly applied the National Air Tour Management Act (49 U.S.C. 40128) and National Park Service laws (54 U.S.C.) in the ATMPs for both parks. These laws are intended to protect national parks, not promote commercial air tours.

The NPS Organic Act and the Redwoods Amendment Act together create a clear conservation mandate, and that use of national parks cannot derogate from the values and purposes for which those protected areas were established. The NPS's 2006 Management Policies create a binding interpretation of the

Organic Act (*Greater Yellowstone Coal. v. Kempthorne*, 577 F. Supp. 2d 183, 196). The NPS Management Policies explain that the Organic Act creates two independent mandates: a conservation mandate and a prohibition on impairment. Those mandates require NPS to "seek ways to avoid, or to minimize to the greatest extent practicable, adverse impacts on park resources and values" but also "allow impacts to park resources and values when necessary and appropriate to fulfill the purposes of the park, so long as the impact does not constitute impairment of the affected resources and values." § 1.4.3. Further, where there is conflict between conserving resources and values and providing for enjoyment of them, conservation is to be predominant.

In Hawai'i Volcanoes and Haleakala National Parks, the NPS has identified the protection of natural sounds as a primary purpose for each park. The NPS 2006 Management Policies define the natural soundscape as a park resource. § 1.4.6. The policies also define "unacceptable impacts" as "impacts that, individually or cumulatively, would... unreasonably interfere with... the natural soundscape maintained in wilderness and natural, historic, or commemorative locations within the park." § 1.4.7. There is no doubt natural sound is a resource protected under the NPS Organic Act.

Furthermore, NPS 2006 Management Policies' section on "soundscape management" states, in part, that "The National Park Service will preserve, to the greatest extent possible, the natural soundscapes of parks" (§ 4.9) and a section on "cultural soundscape management" provides that "The Service will preserve soundscape resources and values of the parks to the greatest extent possible to protect opportunities for appropriate transmission of cultural and historic sounds that are fundamental components of the purposes and values for which the parks were established" (§ 5.3.1.7).

Air tours are and will continue under the preferred alternatives to cause unacceptable impacts to park resources including natural sounds, visitors and Indigenous communities that utilize the parks. Existing air tours are already impairing park resources and conditions per the NPS Organic Act.

Furthermore, when implementing the Wilderness Act (16 U.S. C. 1131-1136), NPS is obligated to choose Alternative 2 which offers the "greatest protection" for the designated, eligible and proposed wilderness for both parks. In a case involving snowmobile noise near wilderness, *Izaak Walton League of America, Inc. v. Kimbell*, 516 F. Supp.2d 982 (D. Minn. 2007). Conservation organizations sued U.S. Forest Service challenging the decision to construct a snowmobile trail connecting lakes adjacent to Boundary Waters Canoe Area Wilderness. The plaintiffs claimed that the trail at issue would project the sights and sounds of snowmobiles into the wilderness area in violation of § 4(b) of the Wilderness Act.

The court held, *inter alia* on cross motions for summary judgment: (1) fact issues existed as to whether the agency's actions degraded the wilderness character of designated wilderness area; (2) the Environmental Assessment (EA) failed to properly analyze noise impact resulting from snowmobile use on the trail; and (3) the EA did not conduct any quantitative measurements of the sound impact in the wilderness. The court concluded:

"[T]he analysis of sound impact contained in the EA is inadequate to support the [Finding of No Significant Impact]. The EA provides no quantitative evidence or analysis of decibel levels projected by the South Fowl Trail into the adjoining wilderness... As discussed above, agency activity that results in sound that is louder, more constant, more frequent, or of a different quality, than the sound that presently exists within the wilderness, is more likely to degrade the wilderness character from its present condition and thus result in a violation of § 4(b) of the Wilderness Act. *Id.* at 995-96. (Emphasis added.). Notably, the court also observed that "an agency's duty to preserve the wilderness character under § 4(b) of the Wilderness Act may apply to agency activity that occurs outside of the boundaries of the wilderness area."<sup>1</sup> *Id.* at @989. We raise this specific issue because both parks are considering commercial air tour management within and near federally designated wilderness.

For both parks units, we believe the National Environmental Policy Act (42 United States Code (U.S.C.), 4321 et seq.) has not been correctly applied. The starting point of the analysis should be the natural ambient sounds of each park unit, and the impact analysis must judge the noise impacts of commercial air tours while they are taking place in each park—specifically which areas will be impacted by noise from air tours in each park. We encourage the agencies to apply this approach to every ATMP.

# Hawai'i Volcanoes National Park

NPS created foundational documents for every park unit. They are grounded by each park's enabling legislation and provide guidance for planning and management decisions. Foundation documents speak to the purpose, significance, fundamental resources and values, and interpretive themes for each park.

NPS describes fundamental resources in the following way:

The fundamental resources and values are those features, systems, processes, experiences, stories, scenes, sounds, smells, or other attributes determined to warrant primary consideration during planning and management processes because they are essential to achieving the purpose of the park and maintaining its significance. Fundamental resources and values are closely related to a park's legislative purpose and are more specific than significance statements.

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. 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 <u>Hawai'i Volcanoes National</u> <u>Park</u>:

- Volcanoes and Associated Volcanic Features and Processes. Two active hot-spot shield volcanoes, dynamic geologic processes, and volcanic features demonstrate the effects of the forces of nature and record the geologic history.
- Body of Scientific Knowledge and Investigations. Documents, collections, and observations contribute to scientific discovery and range from early first-hand accounts of eruptive events to current scientific research and museum collections.

<sup>&</sup>lt;sup>1</sup> But note: The court also stated that: "In other words, where the agency activity does not increase or exacerbate the existing sound impact on the wilderness area, such activity would not degrade the wilderness character of the area. On the other hand, agency activity that results in noise that is louder, more constant, more frequent, or of a different quality, is more likely to degrade the wilderness character from its present condition and thus violate § 4(b)." *Id.* at 989-990.

- Opportunities for Scientific Research and Monitoring. The park serves as a world-class living laboratory for geologic research, conservation biology, ecosystem development, island biogeography, and evolution that continues to build on the existing body of scientific knowledge for resource protection, public safety, and environmental understanding.
- **Biological Diversity.** The park contains an extraordinary assemblage of native plants and animals more than 90% of which are endemic to the Hawaiian Islands and many of which are rare, endangered, and threatened with extinction.
- Ecological Integrity. The park perpetuates native ecosystems and communities, many of which are unique to the park, and provides a refuge for endemic plants and animals that span seven ecological zones ranging from seacoast to alpine. The park also supports the continuation of natural processes and interactions among species and between the biotic and abiotic environments.

• **Natural Sounds.** Park soundscapes are protected from many human-caused sounds and are dominated by the sounds of wind, ocean, volcanic activity, and native species.

- Night Sky and Scenic Vistas. The unobscured night sky is characterized by an absence of artificial light and scenic vistas are unobstructed by development and human-caused air pollution.
- **Remote and Challenging Experiences.** The park promotes opportunities for visitors to experience solitude, primitive conditions, and challenge.
- Natural Landscape Character. From mauka (toward the mountain) to makai (toward the ocean), vast expanses of the park's wilderness have been affected primarily by the forces of nature—retaining their primeval character.
- First-hand Volcanic Experiences. The park provides opportunities for visitors to approach and experience active volcanic eruptions including fountains, fissures, and flows.
- **Pelehonuamea.** Volcanic landscapes and all active flows and products of eruptive events are the representation of Pelehonuamea, deity of Hawaiian volcanoes.
- Wahi Kapu (Sacred Places) and Wahi Pana (Celebrated Places). The entire park landscape and all of its inhabitants and features, including the sky as a layered extension of the landscape, are sacred to Native Hawaiians, particularly Halema'uma'u Crater (home of Pelehonuamea), Mauna Loa's Moku'āweoweo caldera (a focal point for the greater Hawaiian relationship to the universe-stars, sun, moon), and mauka forested areas.
- **Opportunity for Traditional Cultural Use.** Native Hawaiian traditional uses in the park perpetuate traditional practices, knowledge, and the cultural importance of this area. These practices, including chants and dances, depend upon natural sounds, unobstructed views of mountain summits, and an environment that has not been greatly altered by human-caused changes.

• **Cultural Resources.** The park's rich and varied cultural resources, including objects, archeological sites, cultural landscapes, historic structures, and ethnographic resources are preserved and contribute to interpreting and understanding the greater Hawaiian culture and the more recent human history within the park.

As described above, Hawaii Volcanoes is national park with many unique resources and attributes. From active volcanoes to rare, endemic species, this wilderness is enjoyed by over a million visitors a year. The park is sacred to many Native Hawaiians and part of their centuries-old culture. Commercial air tours are not a fundamental resource or value and create unacceptable impacts to those resources and values.

In the Environmental Assessment, the agencies conclude that Alternative 2 prohibiting commercial air tours will best protect the fundamental resources identified by the NPS in its foundational document. It states:

*Noise*: "Alternative 2 would provide 365 days per year without noise from air tours within the ATMP planning area and would reduce noise in the most noise sensitive regions of the Park resulting in direct beneficial effects compared to the No Action Alternative and Alternative 3." (page 39)

*Biological Resources: "*Under Alternative 2, commercial air tour aircraft would not fly within the ATMP planning area which would eliminate this source of noise from the planning area. Therefore, there would be a direct beneficial effect on biological resources since the intensity and likely presence of noise from commercial air tours would be less than under the No Action Alternative." (page 73). *Cultural Resources:* "Under Alternative 2, commercial air tour aircraft would not fly within the ATMP planning area. The elimination of commercial air tours from the ATMP planning area would reduce the noise and visual intrusions from directly impacting the feeling and setting of cultural resources within the APE and result in beneficial impacts to ethnographic resources and sacred sites, TCPs, archeological resources, cultural landscapes, historic districts, and prehistoric and historic buildings and structures compared to current conditions." (page 93).

*Wilderness*: "Under Alternative 2, commercial air tour aircraft would not fly within the ATMP planning area, which would offer the greatest protection to Wilderness. Compared to current conditions, this would enhance Wilderness character by reducing the intensity of noise and number of noise events over Wilderness areas. There would be direct beneficial impacts to the natural quality of Wilderness and the opportunities for solitude under Alternative 2." (page 105)

*Visitor Use and Experience*: "Under Alternative 2, commercial air tours would not fly within the ATMP planning area which would eliminate this source of noise from the ATMP planning area. Therefore, there would be a direct beneficial impact to Park visitor use and experience since the intensity and presence of noise from commercial air tours would be less than under the No Action Alternative. Alternative 2 offers the greatest protection of visitor use and experience." (page 115).

It is obvious the ATMP should have recommended eliminating commercial air tours as it provides the "greatest protection" and "direct beneficial impact" for the park. Both the ATMP and Environmental Assessment provide evidence that the current commercial air tours as well as Alternative 3 that would continue to allow air tours, will harm visitors, natural and cultural resources, wilderness, and wildlife. The agencies found that, "The Park has the highest visitor use among the nine NPS units in Hawai'i. Noise from low flying air tours can have notable impacts on visitor experience. A 2007 survey conducted at the Park found that the majority of people who reported hearing aircraft considered it either unacceptable or annoying and reported negative emotions or feelings associated with aircraft sound." (ATMP at page 11). These broad statements about noise impacts to visitor experience have been ignored for decades by NPS and FAA. Now that the agencies have an opportunity to address this direct conflict by prohibiting commercial air tours, this ATMP recommends continuing this conflict in areas of the park.

Knowing several species could be harmed by noise, the agencies propose mitigation measures that will not guarantee the best possible conditions for them. The ATMP states, "Helicopter noise detrimentally affects physiology, pairing and breeding success, and territory size of birds by limiting communication between individuals. These effects could have a greater impact on critically endangered Hawaiian endemics, which already face a number of additional stressors." (page 11). This careless approach to ensuring the survival of many species violates NPS laws and policies.

We continue to be baffled by the ATMP's recommendations allowing helicopters to hover over the park. On one hand the ATMP states, "Hovering, loitering and/or circling on the Kahuku Route and the Coastal Route are prohibited because they could negatively impact visitor experience and cultural and natural resources, including sensitive sites." (page 12). As a general matter, we agree that hovering over an area is hugely disruptive for visitors and resources. Yet, the ATMP allows hovering where it states, "Hovering, loitering, and/or circling for up to five minutes is permitted on the Pu 'u 'o 'o Route and in the Pu 'u 'o 'o QT Zone. Circling aircraft must turn away from the advancing blade as much as possible minimize noise." (at page 7). The flight path where hovering is allowed is directly adjacent to a state protected area, Kahauale'a Natural Area Reserve and close to the East Rift Designated Wilderness in the park. As we mentioned earlier, the Wilderness Act's protections apply to activities inside and outside of a wilderness area. Allowing commercial air tours is already problematic in the park, adding up to five minutes of hovering and loitering only adds to the violation of laws and policies.

#### Hakeakala National Park

The following fundamental resources and values have been identified for Haleakalā National Park:

• Natural Sounds, Viewsheds, and Dark Night Skies – Natural sounds, panoramic views, and dark night skies greatly contribute to Haleakalā's unique sense of place. Ambient sound levels in the Haleakalā Crater are so low that they approach the threshold of human hearing, and the crater and summit offer world-renowned stargazing opportunities. Visitors flock to the summit to witness spectacular sunrises over the park's natural landscape—this and other views in the park are supported by its excellent air quality. In addition to being highly desired values for visitors, dark night skies and natural soundscapes are vital components of a healthy, intact, biological community. Each plays an important role in wildlife communication and behavior. The preservation of natural sounds, viewsheds, and dark night skies is also critical to effective wilderness management.

• Kīpahulu Moku District (including 'Ohe'o Gulch and Palikea Stream) – Handed down over the centuries through oral tradition and practice, the 'Aha Moku system is the traditional Hawaiian system of natural resource division and management for ocean and land resources. The undiverted free-flowing Palikea stream and 'Ohe'o Gulch are part of an intact East Maui watershed that begins at the piko, or navel, of the island. The park is fortunate to protect nearly all of the Kīpahulu moku, including intact ahupua'a (smaller land divisions) within it. The Kīpahulu Biological Reserve is discussed and analyzed as part of the Native Hawaiian Biological Diversity fundamental resource and value.

 Wilderness – Approximately 24,000 acres of Haleakalā National Park is federally designated wilderness. The wilderness area includes the majority of the Haleakalā Crater and the Kīpahulu Biological Reserve, which protects one of the most intact rainforest ecosystems in the Hawaiian Islands. The wilderness area also has cultural and spiritual significance to Native Hawaiians, who have used these lands since ancient times, and continue to visit sites and features within the wilderness for traditional practices. Visitors have opportunities to participate in wilderness experiences—from expansive views across undeveloped lands to primitive recreation and solitude.

- Ongoing Connections to Living Hawaiian Culture Haleakalā National Park has cultural and spiritual value for Native Hawaiians who have used particular places, sites, and resources in the park for a broad range of activities from ancient times to the present. Among these traditional cultural activities are ritual ceremonies, spiritual training, and practices related to birth and burial. For Native Hawaiians, traditional uses and connections between people and all things spiritual and physical are incorporated in the ancient, sacred tradition of the *Kumulipo* that has been passed down orally for generations in the form of a *mele ko'ihonua* or chant of more than 2,000 lines. The Kumulipo recounts the origin of the universe and the beginnings of the Hawaiian world; it inventories and explains the existence of all resources so that proper care and respect is applied through kuleana (responsibility). Sustaining the connections and interrelationships between Native Hawaiians and culturally significant park resources and places is an important objective of park managers.
- Outstanding Geological Resources, Including the Haleakalā Volcano and Crater Rising to 10,023 feet in elevation, the Haleakalā volcano—also known as the East Maui volcano—is the primary geological feature of the park, and preserves a record of Maui's volcanic history. At the volcano's summit is the enormous depression known as Haleakalā Crater—described by Congress in the 1916 enabling legislation as the "largest and most spectacular crater in the world." In truth, the label "crater" is somewhat of a misnomer, as this impressive depression was not shaped solely by volcanic activity, but also by water and erosion. Northeasterly tradewinds collided with the great volcano, producing rainfall, and over time streams cut channels down the slopes of the mountain. Eventually, two streams that eroded their way up the mountain joined, ultimately creating the long and deep depression that survives today. Later, volcanic vents in this area formed richly colored cinder cones and young lava flows—major scenic features of the park. Lava at Haleakalā National Park includes lower viscosity "ropy flows" (also called *pāhoehoe*) and the higher viscosity "rough and jagged flows" (also called 'a'ā). There are at least 24 known lava tube caves in the park.
- Archeological and Historic Resources Associated with Native Hawaiian Culture Haleakalā National Park preserves a high density and variety of precontact and historic archeological resources. These resources exist in many locations and include Native Hawaiian temples (*heiaus*), trails, altars, fishing shrines, house platforms, and other features. Historic resources such as historic agricultural sites and astrological shelters are also preserved by the park. Some of these resources are still used today as part of the vibrant Hawaiian culture. The upper Kīpahulu Valley, on the park's windward side, exemplifies this rich biodiversity With its wet rainforests and bogs, the upper Kīpahulu Valley is a key refuge for native Hawaiian plant and animal species that are disappearing elsewhere. The park manages this area as the Kīpahulu Biological Reserve. Within the reserve, no trails or roads are planned in order to prevent nonnative species, which are capable of rapidly spreading and outcompeting native rainforest plants, from penetrating the valley. Entry to the reserve is allowed only to resource managers and scientists who are conducting research and management essential to understanding and protecting this rare relict ecosystem.
  - Native Hawaiian Biological Diversity Haleakalā, rising from sea to summit, and exposed to both the windward moist tradewinds and leeward drying air, features a striking variety of ecosystems that support a tremendous range of native biological diversity. The park protects endemic and iconic species including the nēnē (Hawaiian goose), 'ahinahina (Haleakalā silversword), 'akohekohe (the

critically endangered crested honeycreeper), and many other threatened and endangered species. The park's remarkable ecological diversity is recognized by its designation as a United Nations International Biosphere Reserve. Haleakalā serves as a scientific laboratory for studies in climate history and change, classification of species, and taxonomy.

The upper Kīpahulu Valley, on the park's windward side, exemplifies this rich biodiversity – With its wet rainforests and bogs, the upper Kīpahulu Valley is a key refuge for native Hawaiian plant and animal species that are disappearing elsewhere. The park manages this area as the Kīpahulu Biological Reserve. Within the reserve, no trails or roads are planned in order to prevent nonnative species, which are capable of rapidly spreading and outcompeting native rainforest plants, from penetrating the valley. Entry to the reserve is allowed only to resource managers and scientists who are conducting research and management essential to understanding and protecting this rare relict ecosystem.

• Kuleana – The Native Hawaiian concept of kuleana is generally recognized as the responsibility passed down from the kūpuna (ancestors) to present and future generations for stewardship and respect for all things spiritual and physical. Under the traditional 'Aha Moku system of regional boundary management based on observational knowledge and sense of place, certain people had kuleana for site specific management and families had certain roles within their moku (land division). The Pōhaku Pālaha (the place where the moku boundaries converge) marks the beginning of the interconnected system linking the heavens to the depths of the ocean. How kuleana is managed affects other moku outside park boundaries as well as ocean resources. The National Park Service has accepted kuleana for the management of Haleakalā National Park. The National Park Service and the individuals who serve as konohiki (managers and stewards) represent the kia'i, or guardians of this sacred place for Hawaiian people.

There is no doubt Haleakala is a celebrated national park because of its spectacular natural resources from the volcano, rainforest, desert to its rich biodiversity. The cultural traditions and resources are abundant, park managers embrace stewardship concepts handed down by generations of Native Hawaiians. The ATMP should have chosen the most protective management for such a special place. The Environmental Assessment validates the best, most protective management for the park is Alternative 2 which would prohibit commercial air tours, it states:

*Noise*: "Alternative 2 would provide 365 days per year that are free of noise from air tours within the ATMP planning area and would reduce noise in the most noise sensitive regions of the Park resulting in direct beneficial effects compared to the No Action Alternative and Alternative 3." (page 39).

*Biological Resources:* "Under Alternative 2, commercial air tour aircraft would not fly within the ATMP planning area which would eliminate this source of noise from the planning area. Therefore, there would be a direct beneficial effect on biological resources since the intensity and likely presence of noise from commercial air tours would be less than under the No Action Alternative." (page 64).

*Cultural Resources*: "Under Alternative 2, commercial air tour aircraft would not fly within the ATMP planning area. The elimination of commercial air tours from the ATMP planning area would reduce the noise and visual intrusions from impacting the feeling and setting of cultural resources within the APE and result in beneficial impacts, including ethnographic resources and sacred sites, TCPs, archeological resources, cultural landscapes, historic districts, and prehistoric and historic buildings and structures compared to current conditions." (page 81).

*Wilderness*: "Under Alternative 2, commercial air tour aircraft would not fly within the ATMP planning area, which would offer the greatest protection to Wilderness. Compared to current conditions, this would enhance Wilderness character by reducing the intensity of noise and number of noise events over Wilderness areas. There would be direct beneficial impacts to the natural quality of Wilderness and the opportunities for solitude under Alternative 2." (page 93).

*Visitor Use and Experience*: "Under Alternative 2, commercial air tours would not fly within the ATMP planning area which would eliminate this source of noise from the ATMP planning area for up to 1.05 million Park visitors each year. Therefore, there would be a direct beneficial impact to Park visitor use and experience since the intensity and presence of noise from commercial air tours would be less than under the No Action Alternative. Alternative 2 offers the greatest protection of visitor use and experience." (page 102).

NPS and FAA should be choosing the alternative that had a "direct beneficial impact" and offers the "greatest protection" for Haleakala.

According to the ATMP's "justification for measures taken," "The number of flights authorized per year was selected to reduce impacts to noise sensitive areas in the Park including those with Wilderness values, cultural resources, natural acoustic environment, wildlife, and visitor experience while also providing expansive views of the coastal areas to commercial air tour customers. These are noise sensitive areas of the Park where a quiet setting is a generally recognized feature or attribute." (page 14). This is a subjective goal determined by the agencies in the ATMP, but this does not comport with the National Park Air Tour Management Act (NPATMA), the law that governs this process. The National Park Air Tour Management Act does not guarantee "customers" anything, in fact, allowing commercial activity in a park is a privilege and not a goal under NPATMA or any other the law. The law states:

Objective.--The objective of any air tour management plan shall be to develop acceptable and effective measures to mitigate or prevent the significant adverse impacts, if any, of commercial air tour operations upon the natural and cultural resources, visitor experiences, and tribal lands.

The agencies continuously admit in the ATMP that natural and cultural resources, visitor experiences and Native Hawaiian cultural sites and interactions will be negatively impacted by commercial air tours. The current noisy conditions in the park are violating laws and policies, slight management changes will not protect the park. The ATMP seeks to minimize flights to one path, but this is guidance and likely won't be strictly enforced. This is just a shell game rather than a true comparison of the ideal protection for the park. The "reduction" noted above is not significant enough to justify continuing commercial air tours. In fact, on page 13 of the ATMP, the agencies pick winners and losers where they identify some areas that will have less noise than others. More specifically, in the Environment Assessment appendices (atTable8. Location point results for Alternative 3), there are a total of 44 locations surveyed for noise, of those, 21 locations report some level of noise above 35 decibels during the day.

We disagree with the NPS and FAA approach comparing noise impacts among the alternatives studied by the agencies. Instead of using the ambient natural sounds (a fundamental resource) as a baseline for judging noise impacts, it compares the alternatives with the current conditions that include thousands of noisy air tours. The ATMP chooses Alternative 3 as its preferred alternative for future air tour management. Using this approach, the Environmental Assessment states, "Time Audible Natural

Ambient: Compared to the No Action Alternative, the overall time audible noise footprint for Alternative 3 potentially is only 1% smaller than the No Action Alternative..." (page 42). This means noise will continue to permeate the park under the agencies' chosen alternative.

The Environmental Assessment states, "Native Hawaiians have consistently noted that the persistent air tours over the Park unreasonably interfere with the silence needed to perform ceremonies conducted by Native Hawaiian practitioners at these sacred sites, some of which rely on hearing natural sounds. Under the No Action Alternative, these impacts to ethnographic resources would continue to occur." (page 80). There is no mention of Native Hawaiian views of continued commercial air tours under Alternative 3, the ATMP chosen management direction.

The forest birds in Haleakala require proactive protection to ensure their survival. The ATMP states, "At least two federally endangered forest bird species within the Park, the kiwikiu and 'akohekohe, are at imminent risk of extinction, with fewer than 200 and 1800 individuals, respectively, left in the wild. In addition to impacts to the birds themselves, aircraft noise adversely impacts the NPS's ability to monitor federally protected Hawaiian forest birds, which is done primarily by acoustic-based surveys to detect birdsongs." (at page 13). If the NPS cannot conduct the studies, the agency could be violating several laws from those governing the NPS to the Endangered Species Act. We would urge the agencies to use the precautionary principle, do not put the forest birds at risk in order to allow commercial air tours.

The ATMP has a prohibition on hovering or circling. The Environment Assessment provides the following reason for this restriction where it states, "This alternative would prohibit hovering and circling because it could negatively impact visitors, cultural, and natural resources, including sensitive sites." (page 22). We appreciate the consideration of visitors and resources, but we find it baffling air tours are allowed at all when the agencies know they have a negative impact.

# General concerns that apply to both parks

As described above, only Alternative 2 meets the Park management objective to protect natural sounds. Alternative 3 does not achieve this objective. Similarly, only Alternative 2 meets management objectives to protect wilderness character. Alternative 3 does not achieve this objective. Had the ATMPs taken as the starting point of the analysis the natural ambient sounds of each park unit, this would have been obvious.

Moreover, the ATMPs EAs for both parks failed to account for the indirect and cumulative impacts of air tour noise in their assessment of the Alternative 3s. In particular, there are a number of entirely foreseeable adaptations to the Alternative 3s that operators will make that will significantly impact park resources, but that were not analyzed, including flights outside the ½ mile ATMP buffer around national parks, the use of larger, noisier equipment, and the use of slower flights that extend the time and noise exposure over the park. Also, the policies to implement the Quiet Technology incentives are too weak and ill-defined to actually mitigate impacts. Each of these is further described below. By not properly analyzing each of these, the assessment of Alternative 3 understates the actual impacts that will result.

#### Flights outside the ½ mile buffer

As the EA notes in several places, with fewer permitted operations within the ATMP planning areas, some operations will be displaced outside the ½ mile boundary. This could be particularly problematic when the noise of the ATMP routes is added to the noise from the non-ATMP flights. Consequently, the

EA understated the noise impact on the park of the ATMP flights because it did not address the cumulative impact of the non-ATMP flights. There are numerous locations where the Park Objectives concerning wilderness character and natural sounds are not met by Alternative 3, and additional noise will further degrade those resources. The Hawaii Volcanoes Coastal Route provides one example, where the ATMP route is only 640 feet from the ATMP planning boundary.<sup>2</sup> The noise of aircraft flying 640 feet further from the Wilderness Area was not analyzed.

The noise from non ATMP tours should have been modeled by the EA where such occurrences are predictable. In the case of the Coastal Route, it is likely that two flights outside the ATMP planning area would have similar noise impacts to one flight on the ATMP Coastal Route. Moreover, it is likely that not only will operations be displaced, but in order to meet Quiet Technology incentives, it is likely that operators will use Quieter Technology flights within the park and noisier technology outside the park. The noisier equipment on the "half mile" coastal route could have a greater impact than the actual ATMP Coastal Route. The expected cumulative adverse effects of the "half-mile" coastal route, coupled with the lack of analysis in the EA, make the ATMP Coastal Route severely deficient.

Even without considering the cumulative impacts, the Coastal Route is extremely problematic. It should be noted that the ATMP Coastal Route does not provide an adequate buffer for the adjacent Wilderness Area. The Coastal Route is 2000 feet off shore but extends ¼ mile (1,320 feet) on either side, leaving only a 680 foot buffer to the wilderness area. According to the EA, "The Coastal Route runs bidirectionally offshore along the edge of the Park boundary, but within ½-mile of the Park boundary. Air tours on the Coastal Route would maintain 2,000 ft. lateral distance from shore and a minimum altitude of 2,000 ft. AGL" (EA, 21). But the EA for both parks also notes that "Air tour routes within the ATMP planning area are represented by a line with a ¼-mile buffer on either side of the route that indicates the acceptable range of deviation that would not trigger enforcement action" (EA, 20).

Flights 680 lateral feet from a wilderness area provide negligible additional buffer than what is provided by the 2,000 foot minimum height. The noise path following the hypotenuse of a triangle with legs of 2,000 feet (height) and 680 feet (lateral distance) is only 112 feet longer than a direct overflight path. The lateral distance to the Wilderness Area is not sufficient.

# The cumulative impacts of non-ATMP and ATMP routes, including the Coastal Route and other routes where displaced flights may impact the parks, and particularly wilderness areas, must be quantified and analyzed.

# Larger, noisier aircraft

Larger, and likely noisier, aircraft are another possible indirect impact not considered. Given that operations are allocated, and not the number of passengers, it is entirely foreseeable that operators will seek to maximize the number of passengers with possibly noisier aircraft to increase the number of paying passengers. This outcome will change the mix of aircraft modeled by the EA. The only protection is the unspecified (by the EA and AMTP) Quiet Technology and replacement requirements (see below for a further discussion concerning the insufficient Quiet Technology policy). The replacement and Quiet Technology policy must be updated as described below.

<sup>&</sup>lt;sup>2</sup> The Coastal Route is 2000 lateral feet from the wilderness area, while the half mile ATMP planning area is 2640 feet from the wilderness area, a difference of only 640 lateral feet.

#### Longer time in the ATMP area

It is almost certain that the EAs' noise modeling has understated the time aircraft will spend in the ATMP planning areas. Given that only operations are allocated, and not time in the ATMP planning airspace, it is entirely foreseeable that operators will seek to lengthen flights or increase revenue generating hours of flights, by flying at a slower rate, increasing noise exposure in the Park.<sup>3</sup> This scenario, which the ATMP allows for, would make the impacts analysis in the EAs inaccurate and inadequate. The AMTPs and EAs should have included time limits to routes in the form of an annual time budget for the year. The annual time over the ATMP planning areas that was modeled should have been disclosed. That time was the basis for the EAs' decision and should have been described in the EA as a condition of the operations granted. Instead, the time over the ATMP planning areas was not disclosed. It is not possible to know if the time assumptions were reasonable and what impact operations of greater time might have, as the ATMPs allow for aircrafts to spend greater time in the ATMP planning areas than the EAs analyzed. The lack of this information makes the ATMPs and EAs analysis of Alternative 3 inadequate.

The FAA and NPS relied on numerous time-above metrics<sup>4</sup> in assessing the impact of noise, and **more time in the ATMP planning area is directly related to more impacts.** To achieve the impacts shown in the Alternative 3 analysis, the time operators are over the ATMP areas must be limited to those times in the modeling.

Consequently, Alternative 3 needed to contain an annual noise budget as much as it needed to limit operations to the number modeled. The budget should be based on the assumptions in the EA noise modeling, and if the budget is exceeded before the permitted operations are used, no further operations shall occur that year or those operations shall deducted from the following year's allocation.<sup>5</sup>

It should be noted that the total time an operator is over the ATMP planning areas is currently required to be tracked and is part of the required reporting data, so determination of compliance with the operations would be no different than for the time.

Moreover, without a time limit within the ATMP planning areas, the ATMP's no hovering or circling rules are ineffective. Not only are these terms not defined, but operators could easily evade the no hovering rule by simply flying slower at specific locations, and possibly during the entire flight. Consequently, without adding a time limit, the EA modeling almost certainly understates the noise impacts.

# In addition to prescribing annual operations, the ATMPs Alternative 3 should have prescribed the annual time permitted in the ATMPs planning areas. Otherwise operators will just fly slower and

<sup>4</sup> E.g. time audible, time above 35dba, time above 52dba

<sup>&</sup>lt;sup>3</sup> It should be noted that we have heard concerns from helicopter operators who feel that the sharing of routes by fixed wing and helicopters, due to their different speeds, creates safety hazards. While we are not in a position to judge the level of hazard, there is no need to create multiple routes for each aircraft type. The aircraft can be segregated by simple time of day or day of week schedules for each aircraft type on a particular route.

<sup>&</sup>lt;sup>5</sup> An annual time budget, based on the cumulative time each operation was modeled in the ATMPs planning areas in the EA, would provide operators with flexibility due to weather, traffic, and other factors throughout the year, yet ensure that impacts are no greater than those modeled by the EA. If operators were to claim that the annual budget developed from the modeling assumptions is not sufficient due to safety or some other consideration, this would mean that the initial EA modeling assumptions were wrong and understated the noise impact of flights, and would need to be recalculated with operations further limited to limit impacts on park resources.

increase impacts to resources beyond those described in the EA. The impact of operations is directly related to the time those operations are over the park.

# Quiet Technology Policy

Neither the EAs nor the ATMPs define or describe Quiet Technology. Consequently, the proposed Quiet Technology policy is insufficient to protect park resources from increasing impacts. The current plan treats quiet technology as a static condition and will not encourage further reductions in noise levels; it rewards quieter technology with more times to fly (extending hours during the day and on Wednesdays), but does not incentivize future gains. In fact, as more quiet technology aircraft are integrated into the fleet mix, the "quiet technology times" will only get louder as more aircraft take advantage of those times.

The proposed incentives for Quiet Technology are poorly designed and do not reflect a serious effort to reduce adverse impacts from operators. Had the agencies taken this aspect seriously, they would have proposed and analyzed incentives in the ATMPs and EAs that create a competitive marketplace for quiet, not incentives that expand operating times and days.

For example, a much more effective Quiet Technology incentive would be to reserve 25% to 50% of operations for the operators who fly the quietest technology. To implement such a policy, the FAA/NPS, based on the reporting data submitted by operators, would determine the rank of each operator in terms of their use of Quiet Technology equipment. In the first and second year of the ATMP, the distribution of operations would be the same as currently proposed in the ATMP, with the 25% -50% reward for Quiet Technology incentive being awarded as in the current ATMP. In the third year, the 25%-50% would be allocated to operators in proportion to their rank during the first year. In subsequent years, the 25% - 50% Quiet Technology incentive would be redistributed based on the next calculation year. Effectively, this would create a 1 year lag to allow the NPS/FAA time to collect and analyze the reporting data and allow operators to adjust their schedules based on the new allocation.

The AMTP does not define Quiet Technology, but the definition is critical to the minimization of impacts on park resources. We propose a very simple definition of Quiet Technology aircraft. Quiet Technology aircraft are those aircraft with the least noise impact on the park.

Before exploring this definition, however, it is important to recognize that previous work by the FAA published in Advisory Circular AC-93-2, is not helpful or appropriate for application in AMTPs. This document lists aircraft meeting a "noise efficiency standard" that reduces noise per seat.

The Advisory Circular is outdated and a "noise efficiency standard" is a poor definition of Quiet Technology because it may or may not correspond to a lesser impact of overflight noise on parks. The simple reason is because **noise efficiency** and **quiet technology** are not the same thing. Less noise per passenger seat does not equate to less noise and fewer impacts per operation on the park. Therefore, noise efficiency does not measure the effectiveness of quiet technology on parks.

It is actually impossible to determine which technology is quietest using AC-93-2 criteria, because the Advisory Circular employs five different equations (see below), three different metrics (EPNL, SEL, and LAmax), and 5 different methodologies.

EPNL(H) = 80 +10log(# PAX seats/2) dB

SEL(J) = 77 +10log(# PAX seats/2) dB LAmax(F) = 69 +10log(# PAX seats/2) dB LAmax(G) = 74 +10log(# PAX seats/2) dB LAmax(G) = 77+10log(# PAX seats/2) dB

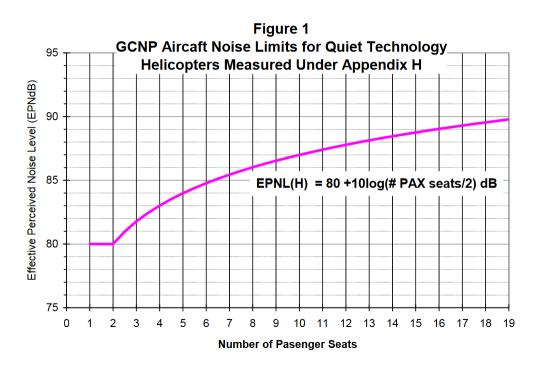
The FAA AC-93-2 noise efficiency or per passenger seat noise metric, as expressed by the equation

Noise Threshold= X dB + 10Log(#PAX seats/2) dB

is not a useful metric to identify technology that has the least impact on a national park. If it were used as the criteria, it would be very problematic and exacerbate the problem discussed above in the section entitled "Larger, noisier aircraft." It is a metric suited for minimizing the noise per passenger, not the noise imposed on the park. **Only if the park were allocating passenger seats would it be a viable option**. But since parks allocate operations and not passenger seats, the metric has the perverse effect of *maximizing* aircraft noise impacts on the park per operation.<sup>6</sup>

Consider, for example, Figure 1 from AC-93-2

(https://www.faa.gov/documentLibrary/media/Advisory\_Circular/AC\_93-2.pdf).



The vertical axis is the noise level; the horizontal axis is number of passengers. Aircraft that fall below the pink line qualify as quiet technology. The pink line defining quiet technology is actually a function of the number of passenger seats on the aircraft. In the equation, the independent variable is passenger

<sup>&</sup>lt;sup>6</sup> It should be noted that it maximizes noise impacts within a given bound, the set of aircraft meeting the A-93-2 criteria. It encourages operators to use the largest/noisiest equipment the market can sustain, and therefore incentivizes those aircraft with the most noise.

seats while the dependent variable is the noise level experienced in the park. The greater the number of passenger seats, the greater the noise impact on the park that qualifies as quiet technology.

The curve of the pink line results from the logarithmic component of the equation (ten times the logarithm of the number of passenger seats divided by 2). The shape of the curve seems to be based on an equal energy hypothesis. The rationale for the initial threshold value (the initial starting value for 1 passenger in Figures 1-4 of AC-93-2) is not given.

The assumption underlying this equal energy hypothesis is that the combined impact of aircraft noise events on the park is related to the combined sound energy of those individual noise events on a per passenger seat basis. Consequently, each doubling of the number of passenger seats allows the addition of 3 dB to the permitted level, just as each doubling of the number of equal noise events (flights for example) adds 3 dB to the total noise level. For example, a helicopter with 4 passengers is permitted to be 83 dBA, a helicopter with 8 passengers is permitted to be 86 dB, and two operations of the 4 passenger helicopter have the same combined noise level as one operation of the 8 passenger helicopter.

The major problem with the AC-93-2 equal energy hypothesis is that it would be an effective metric **only if** the parks allocated passenger seats, not operations, to operators.<sup>7</sup> If parks allocated a limited number of passenger seats, then any distribution of those seats among aircraft would have the same noise impact on the park.<sup>8</sup> In this case, the impact on the park is dependent on the number of seats allocated, and independent of the number of operations used to meet the allocation.

The ATMPs, however, allocate operations instead of allocating passenger seats. In this real world condition, the noise in the park is dependent on the size of the aircraft conducting the allocated operations: the larger the aircraft, the more the impact on the park.

Instead of all configurations of seats among operations resulting in the same noise impact when allocating passenger seats, when operations are allocated using the A-93-2 equations, the incentive is to increase the noise effect on the park. For example, if the limit were four operations, that could be met with either four 4-passenger seat operations which combine to 89 dB, or four 8-passenger operations which combine to 92 dB, or four 16-passenger operations which combine to 95 dB. Clearly, the impact on the park in the above example is dependent on, and increases with, the number of seats per aircraft. With limited operations, the operator will have an incentive to use the largest aircraft the market can sustain, causing the largest noise impact on the park.

The reason for quiet technology incentives in the ATMPs is to promote the use of quieter equipment. But the currently proposed incentives, and particular, if they are combined with the AC definition of Quiet Technology, will instead, incentivize larger noisier aircraft. There are other incentives that more effectively promote the use of quiet technology, such as rewarding operators with operations for their

<sup>&</sup>lt;sup>7</sup> There are additional problems with the AC-93-2 quiet technology designation that should also be noted, including: 1. The use of multiple non-comparable noise metrics.

<sup>2.</sup> The use of a threshold for quiet technology designation.

The threshold actually is a disincentive for the development of future quiet technology and a disincentive for the use of the quietest technology currently since there is no reward for being quieter than the threshold.

<sup>&</sup>lt;sup>8</sup> If for example, 16 passenger seats were allocated, then that allocation can be accomplished for the same approximately 89 dB with either one 89 dB 16 seat aircraft, or two 86 dB 8 seat aircraft, or perhaps a 83 dB 4 passenger aircraft and a 88 dB 12 passenger aircraft (or any other combination of aircraft with seats that add to 16).

use of quiet technology, that we outline but which were not studied and presented in the ATMPs and EAs.

Because quieter technology exists and is constantly being developed, and that today's quietest technology is tomorrow's noisy technology,<sup>9</sup> it is important to define quiet aircraft technology in terms of the quietest aircraft. Static definitions, such as those in AC-93-2 become outdated and disincentives that discourage future technology improvements beyond the minimum threshold. Once the threshold for quiet technology is met, there is no incentive to develop even quieter equipment and no differentiation between aircraft meeting the threshold.<sup>10</sup>

A better alternative to the AC method of identifying quiet technology equipment is to use the AEDT model to determine which operators used the quietest equipment, but such a process is very time and labor intensive, and ultimately unnecessary.

The simplest and most relevant measure of Quiet Technology for national parks is the Sound Exposure Level (SEL) of an aircraft in level flight at 2,000 feet, and it can easily be employed to determine which operators used the quietest equipment. The SEL<sup>11</sup> metric provides a good comparison of noise between aircraft. The other possible metric, the LAmax<sup>12</sup> provides the highest decibel level and measures the impact when it is most intrusive, but it lacks a measure of the duration of the event. The SEL metric combines both magnitude and duration in one metric. The 2,000 foot height is the most common operation permitted by the ATMP.<sup>13</sup>

The SEL noise level can be measured from overflights or derived from the FAA's AEDT noise model, either through modeling or the so called "Noise Power Distance" curves. Once the SEL of each aircraft used in overflights is known, the aircraft can be ranked from quietest to noisiest. From that, a simple weighted average of the "noise rankings" based on the number of operations of each operator will allow comparison between operators to determine their relative rank. For example if there were two operators, and one flew 75 operations with the quietest aircraft and 25 with the second quietest aircraft, and the other operator flew 50 operations with the quietest aircraft and 30 operations with the second quietest aircraft, their weighted average noise ranking would be:

 Operator 1:
 [(75 ops X 1 rank) + (25 ops X 2 rank)]/100 Total ops = 1.25

 Operator 2:
 [(50 ops X 1 rank) + (30 ops X 2 rank)]/80 Total ops = 1.375

The operator with the lowest weighted average ranking is the operator with the least impact on the park, and the one entitled to the greatest reward or incentive for quiet technology.

<sup>&</sup>lt;sup>9</sup> For example, Stage II commercial aircraft are now considered noisy but, were once considered quiet technology. <sup>10</sup> Moreover, it should be noted that "quiet technology" is really a misnomer, since these "quiet technology" aircraft are still very loud. Quietest available technology is a better term.

<sup>&</sup>lt;sup>11</sup> "The Sound Exposure Level (SEL) metric represents all the acoustic energy (a.k.a. sound pressure) of an individual noise event as if that event had occurred within a one-second time period. SEL captures both the level (magnitude) and the duration of a sound event in a single numerical quantity, by "squeezing" all the noise energy from an event into one second. This provides a uniform way to make comparisons among noise events of various durations." (FAA, Fundamentals of Noise and Sound,

https://www.faa.gov/regulations\_policies/policy\_guidance/noise/basics/)

<sup>&</sup>lt;sup>12</sup> LAmax is the maximum A-weighted sound level of an event such as an overflight.

<sup>&</sup>lt;sup>13</sup> The FAA and NPS should develop criteria beyond just the A-weighted SEL to account for other acoustic characteristics such as frequency and sound quality that also determine the intrusiveness of the noise.

After the Quiet Technology rankings of each operator are calculated, and each operator is ranked, the 25% - 50% of operations reserved for operators with the quiet technology can be distributed using a formula such as:

Rank of Operator in Use of Quiet Technology	Incentive (Percentage of Quiet Technology Operations Awarded)
1	30%
2	25%
3	20%
4	15%
5	10%

The ATMPs and EAs analysis of Alternative 3s failed to adequately define Quiet Technology and provide meaningful incentives for use of Quiet Technology.

# Conclusion

In order to protect and preserve Haleakala and Hawaii Volcanoes, the agencies should adopt Alternative 2 (prohibition on air tours).

The ATMPs and EAs for these parks do not propose a serious attempt to address the significant adverse impacts from air tours to the natural and cultural resources and the visitor experiences. A serious attempt would have studied and presented alternatives that include features such as no new entrants, elimination of the Coastal Route at Hawaii, the consideration of cumulative impacts of non-ATMP air tours, the establishment of time in ATMP airspace allocations, and the establishment of an effective Quiet Technologies incentives program.

Sincerely,

Neal Desai Senior Program Director, Pacific Region National Parks Conservation Association Elizabeth Merritt Deputy General Counsel National Trust for Historic Preservation



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

July 11, 2023

Re: Continuing Consultation under Section 106 of the National Historic Preservation Act for the development of an Air Tour Management Plan at Haleakalā National Park and Hawai'i Volcanoes National Park

Dear Kamakana Ferreira:

The Federal Aviation Administration (FAA) and National Park Service (NPS) appreciate your participation in ongoing consultation under Section 106 of the National Historic Preservation Act for the Air Tour Management Plans (ATMPs) at Haleakalā National Park and Hawai'i Volcanoes National Park (Parks). The FAA, as lead federal agency for Section 106, is following up on the meeting of July 6, 2023, which was held to discuss the Office of Hawaiian Affairs' (OHA's) letters from April 20 and April 27, 2023, objecting to the findings of no adverse effect for the ATMPs at the Parks. The FAA is providing confirmation of the commitments agreed to at this meeting and the resolution of OHA's objections.

1) Traditional Cultural Property (TCP) Studies

OHA provided comments strongly recommending a TCP study be done at each of the Parks to better understand cultural resources within the Parks and to ensure that adequate vertical buffers are implemented. The development of the ATMPs is under court supervision and the agencies must complete the ATMPs by December 31, 2023. While a TCP study is underway at Hawai'i Volcanoes National Park, it will not be completed in 2023. Haleakalā National Park has an eligibility determination for the park as a TCP, but a complete study has not been conducted. While the agencies acknowledge the value of TCP studies, due to the time needed to complete a TCP study in good faith, the agencies have instead opted to take a conservative approach in treating properties without a formal designation to be eligible for listing in the National Register of Historic Places and considering the entirety of each Park as a TCP. The agencies based their assessment on information from existing sources, including comments received from cultural practitioners and consulting parties and ethnographic studies/archaeological overviews, including an Ethnographic Study of the Cultural Impacts of Commercial Air Tours over Haleakalā National Park. Based on these sources and cultural concerns presented during Section 106 consultations, the FAA extended the APE to 10,000 ft above MSL at Haleakalā National Park and has no vertical limit at Hawai'i Volcanoes National Park to ensure effects to historic resources extending above the ATMP planning area were taken into consideration.

The agencies also emphasize that the ATMPs are living documents and allow for an amendment process. The effectiveness of the ATMPs will be monitored following their implementation and annual meetings will be held to discuss any amendments or other changes needed to the ATMPs

(Sections 3 and 4). The ATMPs allow for amendments if new or unanticipated effects are identified, new information is received, including information received through Native Hawaiian input and/or consultation, or circumstances have changed. These provisions are more fully explained in the ATMPs, including Section 8 for Adaptive Management and Section 9 Amendment.

While a TCP study for each park would be helpful in understanding historic properties within each park, the studies would not be completed in time to assist in evaluating historic properties for the undertakings at each park. Based on this understanding by the parties, the FAA considers this objection resolved.

2) No-Fly Days

OHA requested an explanation on how the current no-fly days were determined at Haleakalā National Park and that the agencies reconsider the number of no-fly days in response to comments received as part of Section 106 consultation. The ATMP at Haleakalā National Park currently includes 6 no-fly days generated by following the Hawaiian Moon Calendar and Makahiki Season. The park added two Hawai'i State Holidays that are historically significant to Native Hawaiians, bringing the number of culturally and/or historically significant no-fly days related to 8. Additionally, every Sunday and Wednesday are no-fly days bringing the total number of no-fly days up to 112.<sup>1</sup> The ATMP also includes provisions for NPS to establish additional temporary no fly periods for other special events.

The no-fly days were determined through joint Kīpahulu and Summit Kūpuna Group meeting held in 2014 to discuss commercial free days for the Park's Commercial Services Plan. These days were identified with the intention to provide opportunities for Native Hawaiians to conduct cultural practices without interruption from commercial tours. The Park asked for input from Hawaiian staff and community members, as requested through Kūpuna Group consultation. The input included Kamehameha Day, days honoring the passing of Hawaiian park staff and astrologically significant days.

During the April 20, 2023, Section 106 information meeting to explain and respond to questions about the agency's proposed finding and assessment of effects, a consulting party requested the agencies increase the number of no-fly days associated with days of significance to Native Hawaiians. The matter was deferred to the National Environmental Policy Act (NEPA) process, as changes to the ATMP are being considered through the public comment process on the Draft EA and ATMP and increasing the number of no-fly days would not change the agency's proposed finding of no adverse effect. The comments received through the Section 106 consultation process requesting additional no-fly days have been sent to the NPS's Planning, Environment and Public Comment (PEPC) site on behalf of the commenters. The NPS is considering these requests.

The FAA understands this objection is resolved as the matter is being considered through the NEPA process and identification of any additional no-fly days would be determined through ongoing consultation outside of Section 106.

<sup>&</sup>lt;sup>1</sup> This number is assuming that the eight culturally and/or historically significant no fly days do not fall on a Sunday or Wednesday.

## 3) Possible Impacts to the Lo'alo'a Heiau in Kaupō

Following comments that the FAA and NPS received from consulting parties in November 2022, the APE at Haleakalā National Park was expanded to include the Kaupō area bounded to the south by the southern limits of the ½ mile buffer around the Kaupō Denman parcel. During the April 20, 2023, information meeting, residents of Kaupō had noted that the Lo'alo'a Heiau is in this area and that helicopter noise has been disturbing cultural practices. OHA noted and the agencies recognize that this heiau is listed in the National Register of Historic Places. OHA requested that Lo'alo'a Heiau and Naholoku archaeological sites be included as part of the list of historic properties in the APE and a re-evaluation of the current flight route in light of this information.

The Naholoku archaeological sites are within the APE and listed as a historic property in the Finding of Effects Letter. The FAA received boundary information from the SHPD for the Lo'alo'a Heiau and determined it is outside the APE. Mapping was screen shared at the July 6, 2023, meeting and a map showing the location of the heiau in relation to the APE is attached to this letter to confirm. The OHA requested that the location of the heiau is depicted on a map showing the APE and is shared with the consulting parties. The concerns noted in the April information meeting were regarding current noise, and the agencies do not believe it is reasonably foreseeable that impacts from the ATMP would extend outside the APE.

The agencies are providing the attached map to show the location of the Lo'alo'a Heiau, which is close to but outside the APE, and will be including this in future correspondence to all consulting parties. Based on this information and the commitment by the agencies, the FAA understands this objection is resolved.

## 4) Improved pilot training accountability and aircraft maintenance

OHA has made additional recommendations regarding improved pilot training accountability and aircraft maintenance that are outside the scope of Section 106 considerations. These comments have been sent to PEPC in full on behalf of OHA for consideration in the continued development of the ATMP. Due to the nature of these recommendations, the FAA does not consider them to be objections under Section 106.

If you have any questions or concerns regarding this correspondence, please do not hesitate to contact me at (202) 267–4185 or Judith.Walker@faa.gov, copying <u>ATMPTeam@dot.gov</u>.

Sincerely,

Judith Walker Federal Preservation Officer Senior Environmental Policy Analyst Environmental Policy Division (AEE-400) Federal Aviation Administration

Cc: Mililani Trask, Office of Hawaiian Affairs Hulu Lindsey, Office of Hawaiian Affairs Stephanie Hacker, Archaeologist, HI SHPD Jessica Puff, Architecture Branch Chief, HI SHPD

Enclosure:

APE map showing Lo'alo'a Heiau (Not for public release)

APE map showing Loʻaloʻa Heiau

(Figure redacted)



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

July 24, 2023

Re: Advisory Council on Historic Preservation Review Pursuant to 36 CFR §800.5(c)(2) of the Federal Aviation Administration's Proposed Finding of No Adverse Effect on Historic Properties from the Implementation of an Air Tour Management Plan for Hawai'i Volcanoes National Park

Ms. Jaime Loichinger Assistant Director Office of Federal Agency Programs Advisory Council on Historic Preservation 401 F Street, Ste. 308 Washington, DC 20001

Dear Ms. Loichinger:

The Federal Aviation Administration (FAA), as the lead Federal agency and in coordination with the National Park Service (NPS), respectfully requests that the Advisory Council on Historic Preservation (ACHP) review the FAA's proposed finding of no adverse effect on historic properties from the implementation of an Air Tour Management Plan (ATMP) for Hawai'i Volcanoes National Park (the Park) made under Section 106 of the National Historic Preservation Act. The FAA submits this request in accordance with 36 CFR §800.5(c)(2)(i) in response to objections from five consulting parties, specifically, Mr. John Carse, the National Trust for Historic Preservation (NTHP), the Office of Hawaiian Affairs (OHA), and Kamehameha Schools (KS), and the National Parks Conservation Association (NPCA) to the proposed finding. The FAA is concurrently notifying all consulting parties about this request and will make the request documentation available to the public at:

https://www.faa.gov/about/office\_org/headquarters\_offices/ara/programs/air\_tour\_management\_pla\_n.

Enclosed is the correspondence sent to, and received from, consulting parties throughout the consultation process (*see* Exhibits 1 through 9). In particular, Exhibit 8 contains the agency's March 27, 2023, finding of effect letter, which meets the requirements of 36 CFR §800.11(e). The finding of effect letter describes the undertaking, the Area of Potential Effects (APE), a description of steps taken to identify historic properties, a description of historic properties in the APE and the characteristics that qualify them for listing in the National Register of Historic Places, and an explanation of why the criteria of adverse effect do not apply to this undertaking. It also describes the Section 106 consultation process and public involvement for this undertaking.

Included in **Exhibit 9** are the responses to FAA's March 27, 2023, letter received from consulting parties. While the FAA received concurrence with the proposed finding of no adverse effect from Bobby Camara (Kupuna), Elizabeth Bell (Kupuna), and the Hawai'i Department of Lands and Natural Resources (DLNR), Division of Forestry and Wildlife; the NTHP, OHA, KS, Mr. Carse, and the NPCA objected to the FAA's determination.

This letter includes background about the National Parks Air Tour Management Act (NPATMA), describes the undertaking and the history of air tours over the Park, provides an overview of the Section 106 consultation process for the undertaking, and addresses the elements of the objections that were made and the FAA's responses.

## The National Parks Air Tour Management Act

NPATMA requires that all commercial air tour operators conducting or intending to conduct a commercial air tour operation over a unit of the National Park System apply to the FAA for authority to undertake such activity. 49 U.S.C. §40128(a)(2)(A). As amended by the FAA Modernization and Reform Act of 2012, NPATMA further requires the FAA, in cooperation with the NPS, to establish an ATMP or voluntary agreement for each park for which applications were made, unless a park has been exempted from this requirement. *Id.* §40128(b)(1)(A), (b)(7). The objective of an ATMP is to "develop acceptable and effective measures to mitigate or prevent the significant adverse impacts, if any, of commercial air tour operations upon the natural and cultural resources, visitor experiences, and tribal lands." *Id.* §40128(b)(1)(B).

FAA regulations define a commercial air tour as:

[A]ny flight, conducted for compensation or hire in a powered aircraft where a purpose of the flight is sightseeing over a national park, within ½ mile outside the boundary of any national park, or over tribal lands during which the aircraft flies:

(i) Below 5,000 feet above ground level (except for the purpose of takeoff or landing, or as necessary for the safe operation of an aircraft as determined under the rules and regulations of the Federal Aviation Administration requiring the pilot-in-command to take action to ensure the safe operation of the aircraft); [or]

(ii) Less than 1 mile laterally from any geographic feature within the park (unless more than  $\frac{1}{2}$  mile outside the boundary). . . .

14 CFR §136.33(d).

Because Congress anticipated that the development of ATMPs would take time, it provided in NPATMA that prior to the establishment of an ATMP, the FAA "*shall* grant interim operating authority" to existing air tour operators that apply for prospective operating authority. 49 U.S.C. §40128(c)(1) (emphasis added). NPATMA required that interim operating authority (IOA) was the greater of the number of commercial air tour flights over the park during the 12-month period, or the average number of commercial air tour flights within the 36-month period, prior to the enactment of NPATMA. *Id.* §40128(c)(2).

# The History of Air Tours at the Park

Commercial air tours have been operating over the Park for more than 40 years. Prior to NPATMA's enactment in 2000, the FAA did not regulate air tours over national parks, and the NPS did not have authority to regulate commercial air tours. Air tour operators were subject only to FAA's general safety

regulations and Special Federal Aviation Regulation (SFAR) No. 71, Special Operating Rules for Air Tour Operators in The State of Hawai'i (14 CFR 136 Appendix A). Per SFAR-71, commercial air tour operators could not operate below 1,500 ft. above the surface in all areas of the State of Hawai'i, unless otherwise authorized by the FAA. At that time there were no limits on the number of air tours that could be conducted per year and no designated flight paths or altitudes for flights.

Since 2005, most commercial air tours over national parks, including Hawai'i Volcanoes National Park, have been conducted pursuant to IOA issued by the FAA in accordance with NPATMA. *See* 70 Fed. Reg. 36,456 (June 23, 2005). Because the FAA's grant of IOA was a non-discretionary agency act mandated by Congress, compliance with the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act was not required. *See Sugarloaf Citizens Ass'n v. FERC*, 959 F.2d 508, 513 (4th Cir. 1992) (holding that where an agency did not have the discretion to deny certification to a facility that met certain criteria, compliance with NEPA and Section 106 was not required); *Sac & Fox Nation of Missouri v. Norton*, 240 F.3d 1250, 1263 (10th Cir. 2001) (compliance with Section 106 and NEPA is not required for nondiscretionary actions).

In 2008, the FAA published an operational guidance document for commercial air tours in Hawai'i, the Hawai'i Air Tour Common Procedures Manual (Manual). The Manual covers a variety of training requirements and operational requirements, including air tour operations below 1,500 ft. AGL. It also includes detailed maps and delineates areas on the Island of Hawai'i where operators may fly below 1,500 ft. AGL.

Currently, ten<sup>1</sup> operators hold IOA to conduct 26,664 air tours each year over the Park and within ½ mile of the Park's boundary. The agencies consider the existing operations for commercial air tours to be an average of 2017-2019 annual air tours flown, which is 11,376 air tours. A three-year average is used because it reflects the most accurate and reliable air tour conditions, and accounts for variations across multiple years. Under existing conditions, there are no designated flight paths or no-fly zones that operators must adhere to; however, commercial air tours are generally concentrated along the east portion of the Park and around the Kīlauea Crater according to available automatic dependent surveillance-broadcast (ADS-B) systems data<sup>2</sup> of flight paths. Minimum altitudes for commercial air tours within the ATMP planning area are flown in accordance with the Manual, from 500 to 1,500 ft. above ground level (AGL), weather dependent and contingent on location over the island.

In accordance with NPATMA and a plan mandated and approved by the U.S. Court of Appeals for the District of Columbia Circuit (Court), the FAA and the NPS are developing an ATMP for the Park. The Court retained jurisdiction to approve the agencies' plan and monitor their progress. Thus, the planning process to implement an ATMP for the Park has proceeded, and remains, under Court supervision.

## The Undertaking

The FAA has determined that the development and implementation of an ATMP for the Park is an undertaking under the National Historic Preservation Act. The ATMP for the Park includes the following:

- Reduces the annual number of commercial air tours permitted within the ATMP planning area to 1,565 flights.
- Designates three flight paths within the ATMP planning area. The flight paths are intended to protect visitor experience, natural and cultural resources, and acoustic resources of the

<sup>&</sup>lt;sup>1</sup> Only seven of the ten operators that hold IOA for the Park reported flying commercial air tours over the Park between 2013 and 2020.

<sup>&</sup>lt;sup>2</sup> ADS-B systems periodically transmits aircraft location data in real-time.

Park by consolidating existing transportation corridors and avoiding noise-sensitive wildlife habitat and historic properties;

- Would not allow air tours to be conducted over designated or eligible, or potential Wilderness within the Park.
- Sets a minimum altitude of 1,500 ft. AGL or 2,000 ft. AGL over sensitive sites;
- Sets time-of-day restrictions for flights to 10 AM 2 PM for non-quiet technology flights and 9 AM – 5 PM for quiet technology flights;
- Establishes no-fly days on Sundays and quiet technology-only days on Wednesdays;
- Limits loitering and circling, permitting up to 5 minutes on the Pu'u'ō'ō Route and in the Pu'u'ō'ō QT Zone;
- Provides incentives for operators to adopt and use quiet technology;
- Provides for operator training and education;
- Permits the NPS to establish no fly periods for special events or planned park management with two months' notice to the operators and sets a mandatory 5-mile stand-off distance for special events that may be impacted by overflights. Special events may include Native Hawaiian events or other natural and cultural resource programs;
- Provides for mandatory annual meetings between the FAA Flight Standards District Office (FSDO), Park staff, and the operators. The agencies may also invite other stakeholders, such as Native Hawaiian Organizations, to attend;
- Authorizes specific types of aircraft to be used on the tours and specifies that any new or replacement aircraft must not be noisier than the authorized aircraft;
- Requires operators to provide semi-annual reports to the agencies including flight monitoring data;
- Includes safety requirements relating to in-flight communications;
- Allows for minor modifications to the ATMP through adaptive management as long as the environmental impacts of such changes have been previously analyzed;
- Outlines a process for amending the ATMP;
- Provides information regarding the process for operators to apply for operating authority as a new entrant; and
- Sets forth a general process for conducting competitive bidding for air tour allocations, where appropriate.

For further details related to the various elements of the ATMP for the Park, refer to the summary in the FAA's March 27, 2023, finding of effect letter (*see* **Exhibit 8**).

In summary, the number of air tours authorized under the ATMP is 5.9% of those currently allowed under IOA, which is 14% of the 3-year average, and the ATMP requires that operators fly on designated paths that have been delineated to avoid flying over noise sensitive resources, including historic properties. Figure 2 in **Exhibit 4** to this letter depicts ADS-B systems data of flight tracks within the APE under existing conditions. The designated paths under the ATMP are depicted in **Exhibit 8** (Attachment B of the FAA's finding of effect letter).

Under NPATMA, all IOA for the Park terminates by operation of law 180 days after the establishment (effective date) of the ATMP, 49 U.S.C. § 40128(c)(2)(E), after which time no operator may continue to rely on any operating specifications issued under IOA as authority to conduct commercial air tours within the ATMP planning area.

#### **Section 106 Consultation Summary**

## **Consultation Initiation**

The FAA initiated Section 106 consultation with the Hawai'i State Historic Preservation Division (SHPD), Native Hawaiians (including Native Hawaiian Organizations and members of the Park's Kūpuna consultation group), operators, and other consulting parties by letter between March and August of 2021, inviting them to participate in Section 106 consultation and requesting their expertise regarding historic properties, including properties of significance to Native Hawaiian Organizations, such as TCPs, that may be located within the ATMP planning area (*see* **Exhibit 1**). The agencies received responses from the SHPD and five other consulting parties expressing interest in consultation (*see* **Exhibit 1**). Additional newly identified consulting parties were invited throughout the Section 106 process.

## Consulting Party Meetings, Initial APE and Historic Property Identification

The agencies have held listening sessions and consulting party meetings to discuss the ATMP planning process, the range of alternatives, and Section 106 consultation. The agencies held an informational webinar on October 28, 2021, to provide background on the ATMP development process at the Park and held a listening session for the agencies to learn about the historic or sacred areas within the park and listen to the consulting parties past and current concerns on December 10, 2021(*see* **Exhibit 2**). In a letter dated January 24, 2022, OHA provided comments regarding the need for adequate vertical buffers, flight safety, and flight monitoring, and requesting a Traditional Cultural Property (TCP) study for the Park (*see* **Exhibit 2**).

The FAA provided a preliminary list of historic properties in the Park to the SHPD for their review and comment in the scoping cover letter dated March 8, 2022, and another consulting party meeting was held on March 11, 2022 (*see* **Exhibit 3**). On March 16, 2022, Bobby Camara (Kupuna) provided comments noting a deeply intrusive helicopter presence and their noise over several areas of the Park and expressing opposition to any commercial air tours over the Park. During a March 24, 2022, phone call with retired Park staff, Joni Mae Makuakane-Jarrell (Kupuna) voiced support for Alternative 2 (no air tours) and noted that air tours negatively impact and destroy the work to protect and preserve Park resources. In a letter dated April 1, 2022, OHA also expressed support for Alternative 2 (no air tours). In a letter dated April 18, 2022, the SHPD confirmed receipt of the scoping letter and provided recommendations for additional consulting parties. Responses to the March 2022 scoping letter and consulting party meeting are included in **Exhibit 3**.

A consulting party meeting inviting all consulting parties was held on November 21, 2022 (*see* **Exhibit 4**). A preliminary APE, historic property identification list, and maps of the proposed alternatives were included in the invitations and meeting materials for the November 2022 consulting party meeting. The agencies sent a follow-up letter, dated November 22, 2022, requesting comments on the APE and historic properties list (*see* **Exhibit 5**). Between November 2022 and January 2023, the FAA received comments from the Park's Kūpuna consultation group, OHA, Historic Hawai'i Foundation (HHF), Mr. Carse, Aku Hauanio (Kupuna and Kalapana Fishing Council), Earl Louis (Kupuna), NTHP, Nona Wilson (Kupuna), and the Department of Hawaiian Home Lands (DHHL). These comments are included in **Exhibit 5**.

## Expanded APE, Revised Historic Properties List, and Comment Response Letter

The FAA expanded the APE following consulting party feedback during and after the November 21, 2022, meeting. The FAA sent a letter dated December 23, 2022, to the SHPD with a description of the expanded APE and a revised APE map to incorporate additional areas potentially affected by the

undertaking (*see* **Exhibit 6**). The SHPD responded on January 27, 2023, that they do not object to the APE (*see* **Exhibit 6**). On February 21, 2023, the FAA sent a Section 106 consultation letter to all consulting parties that provided responses to comments received during and following the November 2022 consulting party meeting, a revised APE map, and a revised historic properties list and asked for assistance in identifying cultural resources within the revised APE (*see* **Exhibit 7**). The FAA did not receive any responses to the February 21, 2023, letter.

## Finding of Effect Letter and April Informational Meeting

The FAA thoroughly analyzed the effects of the undertaking to support its determination of no adverse effect in its March 27, 2023, letter (*see* Exhibit 8). In accordance with 36 CFR § 800.5(c), the FAA sent the correspondence to all 70 consulting parties, requesting that they concur with the agency's finding. The letter included an invitation to an informational meeting on April 18, 2023, to explain how the FAA arrived at the proposed finding of no adverse effect on historic properties as well as the documentation specified in 36 CFR § 800.11(e). The agencies sent a meeting summary and Question and Answer (Q&A) document with agency responses to questions asked during the informational meeting to all consulting parties on April 28, 2023 (*see* Exhibit 8).

In a letter dated April 21, 2023, the SHPD stated that in order to determine whether to concur with the FAA's proposed effect determination, it must take into account information received during the April 18, 2023, informational meeting. In the same letter, the SHPD requested all of the consulting parties' responses received by the agency to the finding of effect letter as well as comments provided during the April 2023 informational meeting for the ATMP (*see* **Exhibit 9**) and that it would respond to the FAA's March 27, 2023, letter following receipt of this information. The FAA responded in a letter dated April 28, 2023, providing the meeting summary and Q&A document from the April 18, 2023, informational meeting. The FAA noted that the finding of effect letter provided the SHPD with the documentation specified in 36 CFR § 800.11(e) and requested SHPD's response to the finding of no adverse effect by May 1, 2023 (*see* **Exhibit 9**). Although not required under 36 CFR § 800.11(d), the FAA also provided consulting party responses to the March 27, 2023, finding of effect letter. The SHPD did not provide a response to the finding of effect letter.

## **Consulting Party Objections**

The FAA sent its finding of effect letter on March 27, 2023, to all 70 consulting parties requesting that they concur with the agency's finding. Seven consulting parties provided responses to the request. The State of Hawai'i DLNR, Division of Forestry and Wildlife and two individuals from the Kūpuna concurred with the FAA's proposed finding of no adverse effects for the undertaking. The FAA received objections from four consulting parties during the 30-day review period: the OHA, Mr. Carse, the NTHP, and KS. Through continuing consultation, the FAA was able to resolve the objections with OHA. As such, their concerns will not be further addressed in this document. **Exhibit 9** shows the commitments the agency made to resolve the disagreement with OHA. The remaining objections are summarized below:

The NTHP bases its objection on three issues: (1) it contends that the FAA used an incorrect baseline to assess the effects of the undertaking; (2) it claims that the FAA did not consider cumulative effects when assessing the effects of the undertaking; and, (3) it argues that a finding of adverse effects is the

<sup>&</sup>lt;sup>3</sup> In consultation with the SHPD, representatives from the SHPD's office explained that the SHPD does not respond to an agency's proposed finding of no adverse effect for an undertaking until consultation is complete, including any consultation, pursuant to 36 CFR § 800.5(c)(2)(i), with objecting parties.

appropriate finding if the undertaking permits air tours (*see* Exhibit 9).<sup>4</sup> Mr. Carse bases his objection on three issues, (1) he contends that the assessment of effects of the undertaking does not consider indirect effects; (2) relates to his concerns about the efficacy of the monitoring and enforcement requirement provisions in the undertaking; and, (3) that the consultation meetings are not recorded (*see* Exhibit 9). KS's objection relates to the delineation of the APE, specifically that the APE should be further expanded to include KS property north of the Kīlauea Crater (*see* Exhibit 9).

On June 14, 2023, the NPCA requested to be added as a consulting party for the Section 106 process for the Park. In response, the FAA invited the NPCA to be a consulting party and sent them the finding of effect letter on June 15, 2023. The FAA sent its previous consultation documentation to the NPCA on June 22, 2023, and held a meeting to listen to their comments on July 7, 2023. During that meeting, the NPCA noted that their objections were the same as those stated by other objecting parties, particularly the NTHP. The NPCA sent their written objection to the FAA on July 11, 2023, including a letter dated June 20, 2023, which was also submitted to the agencies through the NEPA public comment process (*see* **Exhibit 9**). The agency found only one issue relevant to the Section 106 process in the June 20, 2023, letter, which was their concern regarding the noise analysis, specifically that the modeling assumptions could be incorrect because air tour operators could use larger, noisier aircraft in order provide more passengers air tours (*see* **Exhibit 9**).

The federal agencies held a meeting on June 15, 2023, to continue consultation with the parties that had objected in an effort to resolve the objections in accordance with 36 CFR §800.5(c)(2). Representatives from the FAA and the NPS met with all four parties that had objected to the finding at that time, as well as representatives of the SHPD and ACHP. The meetings were held to allow for any clarification on the objecting points and seek resolution. The agencies were not able to discuss all comments within the timeframe allotted by this meeting. In order to ensure meaningful consultation with each party, the FAA continued consultation by holding individual meetings with the consulting parties that objected to the agency's proposed finding, as well as the SHPD. Individual meetings were held with the SHPD, NTHP, OHA, KS, and the NPCA.<sup>5</sup> Mr. Carse did not respond to the requests for an individual discussion. The other meetings included a full discussion of the points made by each party and the agencies' responses, but the parties maintained their opposition to the FAA's proposed finding. At the conclusion of the individual consultations the agency held a meeting on July 20, 2023, inviting all parties that have objected to the agency's proposed findings to brief them on the outcome of the consultations and discuss the next steps in the Section 106 process.

# FAA's Response to Consulting Party Objections

The following sections provide the FAA's response to the objections that were not resolved through consultations with the objecting parties.

<sup>&</sup>lt;sup>4</sup> The NTHP, in its April 28, 2023, objection letter, expressed its support for comments and concerns raised by other consulting parties during past consultations. The agencies do not consider NTHP's expression of support for these comments as a part of NTHP's objection. The agencies consider the comments resolved because they have already been addressed and the commentors did not raised them again. See Exhibits 7 and 9.

<sup>&</sup>lt;sup>5</sup> During meeting with the SHPD they informed the agencies that they would like to be included in all of the individual objecting party consultation meetings. The SHPD was invited to all of the individual objecting party meetings but did not attend.

#### **Baseline Conditions**

The NTHP asserts that the baseline for the undertaking (developing and implementing an ATMP for the Park) should be an environment where there are no air tours occurring over the Park. To support this NTHP states that

[t]his undertaking is being developed pursuant to the National Parks Air Tour Management Act of 2000 (Pub. L. 106-181) and its implementing regulations contained in 14 C.F.R. Part 136. Nowhere in either the statute or the regulations are ATMPs required to permit adverse effects. The development of this ATMP is instead a *de novo* evaluation of appropriate air tour uses within Hawaii Volcanoes National Park. It is an exercise of federal jurisdiction and management authority. There is thus no baseline that is required to be accepted in the Section 106 process, and all adverse effects resulting from this undertaking must be taken into account.

The NTHP cites no authority for their legal argument that the development of an ATMP was required to be a *de novo* evaluation of air tour uses over the Park. At the time NPATMA was enacted, commercial air tours were occurring over national parks, including the Park. The legislation, as originally enacted, authorized the agencies to address the impacts of those air tours by establishing ATMPs for parks (with certain exceptions). However, Congress also required the FAA to grant IOA to existing air tour operators. 49 U.S.C. §40128(c)(1). Given that Congress expressly preserved the status quo of existing air tour operations pending the establishment of an ATMP, had it intended to require the agencies to evaluate the impacts of regulating air tours under an ATMP against a condition of no air tours, it would have done so expressly.

The NTHP incorrectly presumes that under NPATMA air tour operations are considered adverse and therefore any ATMP that would allow air tours would result in an adverse effect. The NTHP's argument conflates the agencies' authority to regulate air tours through an ATMP under NPATMA with the determination of the effects of the undertaking (the ATMP) on historic properties under Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations. Under NPATMA, the agencies have the authority to prohibit commercial air tours over national parks in whole or in part, but they are not required to do so. *See* 49 U.S.C. § 40128. NPATMA requires the agency to assess the environmental impacts of the ATMP (the undertaking) and not the operations of air tours generally. *Id.* § 40128(b)(2). Neither NPATMA nor the NHPA require the effects of the undertaking (an ATMP) to be measured against a condition under which no air tours are occurring.

The FAA correctly measured the effects of the ATMP against the existing condition of commercial air tours over the Park. As discussed above, air tours have been occurring over the Park for more than 40 years. Prior to NPATMA, the FAA did not regulate air tours over national parks and the NPS did not have the authority to regulate commercial air tours. After the passage of NPATMA, the FAA granted interim operating authority to existing operators pursuant to Congress's mandate, which, as a non-discretionary act, did not necessitate Section 106 compliance. *See Sugarloaf Citizens Ass'n v. FERC*, 959 F.2d at 513. Consequently, neither the FAA nor the NPS had any compliance obligations under Section 106 related to air tours over the Park, until the undertaking. Therefore, the agencies identified the existing condition of air tours occurring within the ATMP planning area based on a three-year average of operator-reported tours (11,376 air tours per year), including other general operating conditions such as flight paths and altitudes. The FAA then took into account the effects of the ATMP by comparing them to this existing condition. The ATMP includes measures designed to avoid or reduce impacts to historic properties compared to the existing condition of air tours over the Park, including limiting the number of

air tours permitted annually, setting flight paths, increasing minimum altitudes for tours, setting no fly days and establishing the potential to set no fly periods for special events, among other conditions.

The standard set out in the ACHP's regulations for assessing visual and audible effects is whether there is an introduction of visual or audible elements that diminish the integrity of the property's significant historic features. *See* 36 CFR § 800.5(a)(2)(v). The FAA's assessment of the effects of the undertaking is consistent with this standard. As explained in the finding of effect letter, the implementation of the undertaking would reduce noise levels associated with commercial air tour operations over the Park across most of the APE (*see* Exhibit 8). Around the Halapē Wilderness Camp where noise increases in both duration and frequency, the sound levels remain low compared to existing conditions, and when combined with the other minimization measures such as time of day restrictions and no fly days, do not diminish the integrity of historic properties in the area. For example, the 12-hour equivalent sound level increases by seven decibels to 30 dBA (*see* Exhibit 8). Visual impacts to historic properties would decrease due to the decrease in commercial air tour operations overall.

For these reasons, the FAA's use of existing conditions as the baseline against which to measure the impacts of its undertaking is appropriate. The FAA's finding that the undertaking would not diminish the characteristics of any historic properties located within the APE but instead would represent a reduction in audible and visual effects on historic properties when compared to existing conditions is supported and consistent with the ACHP's regulations implementing Section 106 of the NHPA.

#### **Cumulative Impacts**

The NTHP also alleges that the FAA failed to consider cumulative impacts in assessing the effects of the undertaking and proposing a finding that the undertaking will have no adverse effects (*see* Exhibit 9). This is incorrect. The FAA did consider reasonably foreseeable cumulative effects in the assessment of the effects of the undertaking. The regulations describe an adverse effect as:

an undertaking may alter, directly or indirectly, any characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling or association... Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.

## 36 CFR § 800.5(a)(1)

Here, the undertaking reduces the number of flights that may occur within the ATMP planning area by 86% compared to the current condition. It restricts the air tours that will be permitted to three designated flight paths at increased altitudes than are flown under existing conditions (minimum 1,500 – 2,000 ft. AGL, depending on location over the Park and ATMP boundary). The ATMP authorizes the use of specific fixed wing aircraft and helicopters and requires that any new or replacement aircraft must not exceed the noise level produced by the aircraft being replaced (*see* **Exhibit 8**). As a result of these and other provisions in the ATMP, implementation of the undertaking would result in a noticeable reduction of noise and viewshed impacts compared to existing conditions. Air tours will no longer be allowed in the areas with the densest flights under current conditions. Air tour flights themselves and their impacts are transient in nature. Commercial air tours do not cause physical impacts that build upon past impacts. For these reasons, the incremental effect from the implementation of the undertaking would not be adverse.

## ATMP Continues to Allow Adverse Effects

Comments received from the NTHP and others imply the mere existence of air tours is an adverse effect. In clarifying their comments, it became evident that the commenters were noting their preference for a ban of air tours. In their April 28, 2023, letter, the NTHP writes that the ATMP is permitting existing adverse effects and that there are existing adverse effects from air tours. Specifically, NTHP has stated:

The National Trust specifically asserts that the permitting of air tours within Hawaii Volcanoes National Park would cause adverse effects by diminishing the integrity of "setting, ... feeling, or association" of the park's historic resources per 36 C.F.R. § 800.5(a)(1). Air tours within the park also result in an "[I]ntroduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features;" per 36 C.F.R. § 800.5(a)(2)(v).

Permitting air tours or the presence of air tours is not the standard the regulations implementing the National Historic Preservation Act impose when assessing visual and auditory effects from an undertaking. Rather, the standard is whether there is an *introduction* of visual or audible elements that diminish the integrity of the property's significant historic features. *See* 36 CFR §800.5(a)(2)(v). The undertaking is not introducing new noise impacts or new visual impacts, as air tours already exist in the ATMP planning area and have for over 40 years. However, the ATMP would instead *reduce* noise and visual impacts when compared to existing conditions. As further described in the finding of effect letter dated March 27, 2023 (*see* Exhibit 8), the undertaking would not directly or indirectly alter the integrity of the characteristics of a historic property that qualify the property's location, design, setting, materials, workmanship, feeling or association. 36 CFR § 800.5(a)(1). Therefore, the FAA has determined that the implementation of the ATMP will not result in adverse effects on any historic properties.

# APE – Indirect Effects of Air Tour Displacement

KS have objected to the FAA's proposed finding of no adverse effect for the undertaking, solely based on their request to expand the APE to include KS school property near area north of Kīlauea Crater due to their concerns regarding indirect effects from displaced flights as a result of the reduction of air tours in the ATMP planning area. The area of requested expansion was clarified in consultation to include the area to the north of the APE east of the Mauna Loa Unit and southwest of the 'Ōla'a Forest tract. The area can be identified in the vicinity of the label for Safari Aviation on Figure 2 in **Exhibit 4**, where several air tours enter the park based on reported flight paths and ADS-B data. The FAA has declined to further expand the APE at this time for the following reasons.

The FAA initially proposed an APE that included the Park and the area within ½-mile of the Park's boundary which corresponded to the area regulated by the ATMP for the Park (also referred to as the ATMP planning area). In identifying the expanded APE, the FAA considered the number and altitude of commercial air tours in these areas to further assess the potential for visual effects to historic properties, assuming they exist, and any change in noise levels that may result in alteration of the characteristics of historic properties qualifying them as eligible for listing in the National Register. In order to determine where the undertaking would cause indirect effects on historic properties, the FAA reviewed reported routes and ADS-B data to determine where air tour operations were currently occurring and whether the implementation of the undertaking would change air tour flights outside of the ATMP planning area.

As stated in the finding of effect letter, it is reasonably foreseeable with the implementation of the undertaking that operators will continue to fly to areas outside of the ATMP planning area where park features may be visible. The area north of the expanded APE area and west of 'Ōla'a Forest tract

identified by KS was not included in the revised APE because currently reported routes and ADS-B data show a high density of air tours flying over the area under current conditions. Furthermore, while KS speculate that implementing the undertaking will cause an increase in air tour flights hovering over their property, neither KS nor the FAA has data to show that it is reasonably foreseeable the air tour operators will change their current flight routes in that location as a result of the undertaking. However, as discussed with KS during the consulting party meeting, the ATMP includes an amendment provision, which permits revisions to the ATMP if new information, such as effects on historic properties caused by the undertaking that were not addressed during the Section 106 process.

Mr. Carse also voiced an objection related to the indirect impacts of air tour displacement. In particular, he noted in his April 29, 2023, email that "implementation of the plan presented will clearly affect historic areas outside of the park boundaries, which the ATMP is required to consider according to 40 Code of Federal Regulations, Section 1508.8." He did not identify specific areas outside of the APE that he contends will be affected by the introduction of air tours as a result of the ATMP, nor does he supply any basis for identifying any such areas. The agencies cannot speculate regarding whether or where flights will increase in this area in the future based on such a broad assertion.

In sum, the FAA considered available information, consistent with applicable regulations, in determining the area of potential effects for the undertaking, which includes those areas where, based on available data, there may be indirect effects as a result of the ATMP.

#### Listening to Cultural Practitioners

Mr. Carse commented that the Section 106 consultation meetings were not recorded and made available to the public, contending that this is standard procedure for other government agencies. Mr. Carse stated that such recordings would show that "many Native Hawaiian elders – whose ancestors have been here for over 40 generations – felt that there should be absolutely no air tours over the park." However, there is no requirement under 36 CFR Part 800 to record Section 106 consultation meetings and no established standard practice to do so. The method in which consultation meetings are held and documented are at the discretion of the lead federal agency.

The FAA chose to not record consultation meetings for the undertaking to encourage an open dialogue and respect those attendees who may not feel comfortable speaking if a meeting is recorded. The FAA has been very transparent in its consultation and has openly shared relevant information with all consulting parties, including those not in attendance at the meetings. FAA has also taken the comments provided by all consulting parties into consideration in delineating the APE, identifying historic properties, and assessing the effects of the undertaking on historic properties. In accordance with 36 CFR § 800.2(c)(2)(ii)(A), the agency ensured that consultation in the Section 106 process provided the consulting parties, including Native Hawaiian Organizations a reasonable opportunity to identify their concerns about historic properties, advise on the identification and evaluation of historic properties, including those of traditional religious and cultural importance, and articulate their views on the undertaking's effects on such properties.

As noted above, the federal agencies held consultation meetings and listening sessions for the Park's Kūpuna consultation group on December 10, 2021, March 11, 2022, and November 21, 2022; an informational meeting to go over the finding of effect with consulting parties, including Native Hawaiian Organizations and the Park's Kūpuna consultation group, was held on April 18, 2023. Meeting minutes from the December 2021 listening session, which included comments received from Native Hawaiian Organizations and Kūpuna, were provided in the FAA's invitation to the March 2022 listening session, dated March 2, 2022 (*see* Exhibit 3). Comments received during and following the November 2022

consulting party meeting along with agency responses were shared with all consulting parties in a letter dated February 21, 2023 (*see* **Exhibit 7**). Following the April informational meeting, the agencies provided a meeting summary and Q&A to all consulting parties on April 28, 2023; this included all questions asked during the meeting and agency responses to the questions (*see* **Exhibit 8**). Summaries of all comments received as part of the Section 106 process are included in the finding of effect documentation and were considered in the assessment of effects (*see* **Exhibit 8**).

A number of consulting parties imply that because the no air tour alternative is not the undertaking they have not been heard. Comments received from Native Hawaiian Organizations and Kūpuna, including those received during earlier consultations since the passage of NPATMA in 2000, were taken into consideration throughout the ATMP development and Section 106 processes. In particular, these comments were considered regarding identification of historic properties, including the consideration of the entire park as a TCP, and in determining the restrictions to be included in the ATMP. A northern designated flight path proposed in public scoping materials was removed from consideration following comments expressing opposition to this flight path and recommending avoidance of Kīlauea Caldera and other culturally sensitive areas. Time-of-day restrictions in the ATMP were also expanded following these times. Comments were also received that resulted in changes to the restrictions for flights during cultural events, increasing the standoff distance, and mandatory training was added as a requirement for pilots.

## Modeling Assumptions

The NPCA contends that the initial noise modeling assumptions could be incorrect because air tour operators may use larger noisier aircraft that can hold more passengers in order to make up for limitations on air tours imposed by the undertaking. However, the NPCA's assumption that air tour operators independently determine to use larger, noisier aircraft is incorrect. The assumptions made in the noise technical report for the Park are accurate and based on the approved aircraft for the Park. Section 3.3, Aircraft Type, of the ATMP or the undertaking authorizes which type of aircraft may be used for commercial air tours. Furthermore, the undertaking specifies that operators must notify the FAA and NPS in writing of any prospective new or replacement aircraft and obtain concurrence before initiating air tours with the new or replacement aircraft. In addition, new or replacement aircraft must not exceed the noise level produced by the aircraft being replaced.

# Comments Outside the Scope of Section 106

Mr. Carse noted monitoring and enforcement are inadequate and the FAA's ADS-B tracking does not function over many of the historic properties listed in his email objecting to the proposed finding. This comment is outside the scope of the request to concur or not concur with the FAA's proposed finding.

However, comments on matters outside the scope of Section 106 considerations have been sent in full to NPS's Planning, Environment and Public Comment (PEPC) site on behalf of the commenters for consideration in the continued development of the ATMP.

## **Request for Review and Concurrence**

For the reasons stated in the finding of effect letter and as stated above, the FAA has proposed a finding of no adverse effect on historic properties. The FAA respectfully requests the ACHP's review of its proposed finding in accordance with 36 CFR § 800.5(c)(3).

Should you have any questions regarding any of the above, please contact me at 202-267-4185 or <u>Judith.Walker@faa.gov</u> and copy the ATMP team at <u>ATMPTeam@dot.gov</u>.

Sincerely,

Judith Walker Federal Preservation Officer Senior Environmental Policy Analyst Environmental Policy Division (AEE-400) Federal Aviation Administration

CCs: John Carse

Betsy Merritt, National Trust for Historic Preservation Christopher Cody, National Trust for Historic Preservation Namaka Whitehead, Kamehameha Schools Keola Lindsey, Kamehameha Schools Neal Desai, National Parks Conservation Association

Enclosures:

Exhibit 1 – March 29, 2021, Consultation Initiation Letter and Responses

Exhibit 2 – Invitation to December 10, 2021, Listening Session and Responses

Exhibit 3 – Invitation to March 11, 2022, Consulting Party Meeting; March 8, 2022, Scoping Letter; and Responses

Exhibit 4 – Invitation to November 21, 2022, Consulting Party Meeting

Exhibit 5 – November 22, 2022, Request for Comments Letter and Responses

Exhibit 6 – December 23, 2022, APE Letter to the HI SHPD and Response

Exhibit 7 – February 21, 2023, Response to Comments Letter

Exhibit 8 – March 27, 2023, Finding of Effect Letter with Invitation to April 18, 2023, Informational Meeting; Meeting Reminder; and Meeting Summary and Q&A

Exhibit 9 – Responses to Finding of Effect Letter; National Parks Conservation Association (NPCA) Consulting Party Request; and Office of Hawaiian Affairs (OHA) Objection Resolution



Ms. Raquel Girvin Regional Administrator Western-Pacific Region Federal Aviation Administration 777 S Aviation Avenue, Suite 150 El Segundo, CA 90245

# Ref: Proposed Air Tour Management Plan (ATMP) at Hawai'i Volcanoes National Park Hawai'i County, Hawai'i ACHP Project Number: 019858

Dear Ms. Girvin:

On July 24, 2023, the Federal Aviation Administration (FAA) requested that the Advisory Council on Historic Preservation (ACHP) review its finding of "no adverse effect" for the referenced undertaking. The ACHP's opinion was requested pursuant to 36 CFR §§800.5(c)(2) and (3) of the regulations implementing Section 106 of the National Historic Preservation Act (NHPA), "Protection of Historic Properties" (36 CFR Part 800). Four consulting parties objected to the FAA's finding within the 30-day review period; two additional objections were received later from another consulting party and the Hawai'i State Historic Preservation Officer (SHPO). FAA resolved the objection of one of the parties, the Office of Hawai'ian Affairs (OHA), through additional consultation.

Based on the documentation submitted, it appears FAA has not appropriately applied the criteria of adverse effect [36 CFR § 800.5(a)(1)] for this undertaking and that a finding of adverse effect, based on the potential for adverse effects to occur, is appropriate. While we acknowledge the FAA has attempted to reduce the potential for adverse effects through imposition of several conditions, these conditions do not avoid the possibility for adverse effects to result. The rationale for this advisory opinion follows.

# Background

FAA's undertaking consists of the development and implementation of an Air Tour Management Plan (ATMP) for the Hawai'i Volcanoes National Park (Park) to regulate commercial air tours within the ATMP planning area. The undertaking does not include the operation of air tours themselves but "implementing a plan that applies to all commercial air routes over the Park and within ½ mile outside the boundary of the Park." Commercial air tours subject to the ATMP are those conducted for compensation or hire in a powered aircraft for the purposes of sightseeing during which the aircraft flies below 5,000 feet (ft.) above ground level (with minor safety exceptions) and less than one mile laterally from any geographic feature within the Park.

Development of this ATMP or a voluntary agreement is required to comply with the National Parks Air Tour Management Act (NPATMA) enacted in 2000. While commercial air tours have been operating over the Park for more than 20 years, prior to NPATMA, air tour operators were subject only to FAA's general safety regulations. After 2005, air tours operated in accordance with an interim operating authority, also required by NPATMA, for which compliance with Section 106 was not required because it

ADVISORY COUNCIL ON HISTORIC PRESERVATION

did not impose any conditions other than an annual limit on the number of flights. In initiating consultation under Section 106, FAA has asserted that the baseline or existing condition against which it is assessing the potential effects of the undertaking is air tour operation prior to the implementation of the ATMP (i.e., following the interim operating authority), not a condition in which no air tours operate.

FAA, in consultation with the National Park Service (NPS) and consulting parties, including the Hawai'i State Historic Preservation Office (SHPO), Native Hawai'ian Organizations (NHO), members of the Park's Kūpuna consultation group, and operators, delineated the Area of Potential Effects (APE) and conducted its identification effort, which identified 43 historic properties where setting and feeling are primary elements of integrity to the property's National Register of Historic Places (NRHP) eligibility, assuming these historic properties are most sensitive to the effects of aircraft overflights. These include cultural landscapes, rural historic districts, outdoor spaces designed for meditation or contemplation, and certain Traditional Cultural Properties (TCPs) associated with cultural practices, customs, or beliefs that continue to be held or practiced today.

FAA, in consultation with the NPS, determined that the entirety of Hawai'i Volcanoes National Park is a TCP significant for its association with Native Hawai'ian culture, traditions, and sacred uses. A TCP Study to detail all the contributing elements is in progress but is not yet complete.

In considering effects from the implementation of the ATMP, the FAA considered that the number of air tours per year would decrease by 86 percent from the total average number of tours that operated annually from 2017 to 2019, reducing annual number from 11,376 to 1,565. Further, operators would be required to fly on three consolidated routes within the ATMP planning area that avoid noise sensitive resources, including historic properties by increasing the minimum altitude, including time-of-day restrictions, incentivizing the use of quiet technology aircraft, and setting regular no-fly days and the option for additional days for Native Hawai'ian events or other programs. The FAA, in the draft ATMP, included a requirement for semi-annual reporting with flight monitoring data by operators as well as an annual training course and an annual meeting with Park Staff, local FAA Flight Standards District (FSDO), and all operators.

The FAA determined that the undertaking would have "no adverse effect" on historic properties, basing its finding on the aforementioned reduction in tours, and because aircraft are transitory elements in a site or viewshed, meaning that the visual effects would be relatively short in duration.

The FAA recognized that noise from air tours can disruptive to traditional practices, and reiterated its assertion that these effects are temporary and transitory in nature, and would not result in a diminishment of the characteristics of the properties that qualify them for inclusion in the NRHP.

# ACHP's Review of Finding

In making its finding of "no adverse effect," the FAA has relied on its interpretation of 36 CFR \$800.5(a)(2)(v), stating its belief that it is only required to consider potential adverse effects caused by the introduction of audible or visual elements. Because the air tours are a continuation of activities that have occurred for over 20 years, FAA asserts that these are not an introduction of new elements and therefore should not be considered an adverse effect. However, as the ACHP has previously opined to FAA, this section of the regulations includes examples of adverse effects, but does not constitute an exhaustive list, as other changes may also result in an adverse effect.

The FAA's correspondence is clear that the intent is to move air tours away from the most sensitive and avoid direct overflights of *most* historic properties, but it is not clear how FAA determined which historic properties were most sensitive to noise or visual intrusions. From FAA's analysis, flights would increase along the Coastal Route and the Kahuku Route, and noise modeling demonstrated an increase in noise associated with the flights in the vicinity of historic properties near the Coastal Route compared to existing conditions. Any increase in effects from existing conditions, where these effects are also already temporary, represents the potential for adverse effect to historic properties which the FAA has not acknowledged in its finding. As a result, the FAA appears to be prioritizing the reduction of flights over certain historic properties in the Park, such as Kīlauea Crater, at the potential expense of increasing adverse effects to others on these three routes.

While the ACHP agrees it is not within FAA's purview to assess effects that occurred prior to its involvement in the ATMP, it cannot reasonably deny that effects from air tours have been occurring to historic properties in the Park. Further, the measures proposed would reduce or minimize the likelihood that noise from an air tour would interrupt Native Hawai'ian traditional practices and diminish the integrity of setting and feeling for these historic properties, but the conditions set by the ATMP do not completely avoid these effects. Absent ending air tours altogether, there does not appear to be a way to eliminate the potential for adverse effects.

Accordingly, the ACHP recommends that the FAA reconsider its "no adverse effect" finding to be consistent with the threshold in 36 CFR §800.5(a)(1), which recognizes that an adverse effect finding is appropriate when such diminishment of integrity may result from the undertaking, but that diminishment does not have to be a certainty. The FAA should then document the proposed minimization measures and training and reporting requirements as commitments in a Memorandum of Agreement (MOA) and consult further on the development of other measures to resolve adverse effects on historic properties. An MOA would allow FAA to specify contingencies and Section 106 consultation procedures should the measures in the ATMP need to be changed, or adverse effects to historic properties are identified in the future. Should FAA revise its finding to adverse effect, the ACHP would accept the invitation to participate in the continuing consultation to resolve adverse effects.

In accordance with 36 CFR § 800.5(c)(3)(ii)(B), the FAA is required to take into account this advisory opinion in reaching a final decision on its finding of no adverse effect and provide to the ACHP, SHPO, NHOs, and other consulting parties its rationale and a summary of how this opinion was considered. If the FAA affirms its initial finding, once the summary of the decision has been sent to the ACHP and other parties, the agency official's Section 106 responsibilities are fulfilled for review of this undertaking.

Thank you for the opportunity to comment on this dispute regarding effects to historic properties. If we may be of further assistance, or you would like to discuss this matter, please contact Ms. Rachael Mangum, at (202) 517-0214, or via e-mail at rmangum@achp.gov.

Sincerely,

Jalme Wichinger

Jaime Loichinger Acting Director Office of Federal Agency Programs



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

September 12, 2023

Re: Response to the Advisory Council on Historic Preservation's Opinion Pursuant to 36 CFR 800.5(c)(3)(ii)(B) on the Federal Aviation Administration's Proposed Finding of No Adverse Effect on Historic Properties from the Implementation of an Air Tour Management Plan for Hawai'i Volcanoes National Park (ACHP Project Number: 019858)

Ms. Jaime Loichinger Assistant Director Office of Federal Agency Programs Advisory Council on Historic Preservation 401 F Street, Ste. 308 Washington, DC 20001

Dear Ms. Loichinger:

Thank you for your advisory opinion letter dated August 23, 2023, in response to the Federal Aviation Administration's (FAA) request for the Advisory Council on Historic Preservation's (ACHP) review of the proposed finding of no adverse effect for the undertaking (air tour management plan (ATMP)) at Hawai'i Volcanoes National Park. After careful review of the ACHP advisory opinion, the FAA is confirming the finding that implementing the ATMP at Hawai'i Volcanoes National Park would have no adverse effect. The FAA respectfully disagrees for the reasons stated below with the ACHP's opinion that the FAA may not have appropriately applied the criteria of adverse effect [36 CFR § 800.5(a)(1)] for this undertaking and that a finding of adverse effect, based on the potential for adverse effects to occur, is appropriate.

• The ACHP states that, in making its finding of "no adverse effect" [the FAA] has relied on its interpretation of 36 CFR § 800.5(a)(2)(v), stating its belief that it is only required to consider the potential adverse effects caused by the introduction of audible or visual elements. Because air tours are a continuation of activities that have occurred for over 20 years, FAA asserts that these are not an introduction of new elements and therefore should not be considered an adverse effect. However, as ACHP has previously opined to FAA, this section of the regulations includes examples of adverse effects, but does not constitute an exhaustive list, as other changes may also result in an adverse effect.

The FAA acknowledges that 36 CFR § 800.5(a)(2)(v) provides examples of adverse effects and is not an exhaustive list. However, as the FAA explained in assessing the effects of the undertaking on historic

properties within the area of potential effects (APE), the standard the FAA used was whether implementing the ATMP would alter the characteristics that qualify the property for eligibility for listing or inclusion on the National Register of Historic Places (National Register) in accordance with 36 CFR § 800.5(a)(1). In determining whether an effect was adverse, the agency analyzed whether implementing the ATMP would introduce visual or audible elements or change the character of the property within the setting that contributes to its historic significance in a manner that would diminish the integrity of the property. The ACHP suggests that there are "other changes" that may result in an adverse effect; however, the ACHP does not identify what those other changes may be. The FAA, in assessing the effects of the undertaking, analyzed any changes that could result from the implementation of the ATMP, rather than the effects of the existing condition of air tour operations. The FAA assessed the effects of the undertaking in accordance with the Section 106 regulations and appropriately determined that none of the minor noise increases occurring less than two minutes a day when flights occur would diminish the integrity of the historic properties within the APE.

• The ACHP states that "it is clear that the [FAA's] intent is to move air tours away from the most sensitive and avoid direct overflights of most historic properties, but it is not clear how the FAA determined which historic properties were most sensitive to noise or visual intrusions."

In assessing the effects of the undertaking, the FAA did not determine which historic properties were most sensitive; the agency focused on assessing the effects of the undertaking on properties where setting and feeling are the characteristics contributing to the property's National Register eligibility, because they are the type of property most sensitive to the effects of aircraft overflights.

The FAA analyzed impacts to resources, flight safety, and consulted with Native Hawaiians and other consulting parties. This process is how the agencies arrived at the terms and conditions for this undertaking. In the case of Hawai'i Volcanoes National Park, Native Hawaiian Organizations, the Park's Kūpuna consultation group, and individuals articulated a preference for zero air tours because of concerns about impacts from air tours. However, the size and topography of Hawai'i Volcanoes National Park provided several opportunities for reducing air tour impacts. The Kahuku Route was developed to follow a highway with existing noise intrusions in order to mask helicopter noise by the existing highway noise. The Coastal Route was developed over water to avoid historic properties. The Pu'u 'Ō'ō Route, with a single entry and exit over the ocean and following a lava field, was developed to protect Park species.

The FAA learned about specific properties through consultation and public input and gathered significant characteristics through existing documentation and feedback from the consulting parties and Park staff. Consulting party input was considered in the refinement of alternatives for the ATMP. Following initial Section 106 consultation and preliminary environmental analysis, four potential alternatives (No Action Alternative (Alternative 1), Alternative 2 which would not permit air tours within the ATMP planning area, and Alternatives 3 and 4 which would permit limited numbers of air tours in the ATMP planning area on various routes) were released for review and comment during the public scoping period in February 2022. Input received from Native Hawaiian Organizations and Kūpuna were taken into consideration in the development of the alternatives. In response to comments regarding sensitive resources, the agencies dismissed Public Scoping Alternative 3, which included a proposed northern designated flight path, from consideration to avoid Kīlauea Caldera and other culturally sensitive areas in the north. Other modifications included expanding time-of-day restrictions to avoid

cultural practices during sunrise and sunset, increasing the standoff distance during cultural events, and adding mandatory training for pilots. Finally, the undertaking was developed to protect Park resources while allowing air tours by: moving flights away from noise sensitive areas in the Park; creating no-fly zones over the summits of Kīlauea and Mauna Loa to provide greater protection from noise impacts to cultural resources, Native Hawaiian cultural practices, ceremonial sites, and traditional cultural properties; setting minimum altitudes; significantly limiting number of flights; and establishing no-fly days.

Air tours have been operating over Hawai'i Volcanoes National Park for more than 40 years and were operating when most of the historic properties in the APE were determined eligible for or listed on the National Register. Most historic properties in the APE were not determined eligible in an ideal setting devoid of air traffic or modern visual and noise intrusions. The ATMP, which reduces existing air tours over the Park, will therefore not diminish the integrity of the historic properties in the APE.

• The ACHP states, "From FAA's analysis, flights would increase along the Coastal Route and the Kahuku Route, and noise modeling demonstrated an increase in noise associated with the flights in the vicinity of historic properties near the Coastal Route compared to existing conditions. Any increase in effects from existing conditions, where these effects are also already temporary represents a potential for adverse effect to historic properties which the FAA has not acknowledged."

The ACHP is applying a broader standard for determining adverse effects than is stated in 36 CFR § 800.5(a)(1). While the ACHP seems to be stating that any increase in noise represents a potential for an adverse effect, an adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify it for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design setting materials, workmanship, feeling or association. *Id.* The Kahuku Route follows a highway with existing modern intrusions and the Coastal Route is over water instead of land, avoiding direct overflights of historic properties. While the FAA noted that there were noise increases along the Coastal Route in assessing the effects of the undertaking, individuals might only experience minor noise increases for an average of two minutes per day on days when flights are allowed to fly.<sup>1</sup> Therefore, the FAA did not find that the noise increases comprised an adverse effect because the increases were minor and infrequent and would not diminish the integrity of the APE.

Moreover, the ACHP's analysis focuses exclusively on noise impacts, but fails to note other measures in the ATMP that will have beneficial impacts on traditional cultural properties in the ATMP planning area, including those in the vicinity of the Coastal Route and the Kahuku Route compared to current conditions. The ATMP sets Sundays as a no-fly day – meaning no air tours will occur on that day. It also sets time of day restrictions for commercial air tours on those days when air tours are permitted, where such restrictions do not exist under current conditions. In particular, air tours are not authorized during

<sup>&</sup>lt;sup>1</sup> Individuals may experience noise increases for an average of 2 minutes across a 4-8 hour day on days that flights are allowed. The five flights allowed per day are not frequent enough to cause chronic noise disruptions. Note that the noise from air tours will only reach levels that would disrupt noise-sensitive activities for a total maximum of 10 non-consecutive minutes per day and levels that may cause speech interference for one minute per day. These timeframes would be spread across a 4-8 hour operating day; therefore, they would only be experienced for seconds or up to a couple minutes during each of the 5 flights allowed per day and only on days that flights are allowed.

sunrise or sunset, which are both important times of day for traditional cultural activities. Under current conditions, air tours are conducted during these times. Furthermore, as a result of Section 106 consultation and public comment, the ATMP sets 8 annual no-fly days for certain days that are important to traditional cultural practices, in addition to setting Sundays as a no-fly day. The ATMP also provides that the NPS may, with two months' notice to operators, set additional no-fly days for Native Hawaiian cultural events. Further, the ATMP prohibits hovering, loitering, and circling on the Kahuku Route and the Coastal Route and sets a required minimum altitude for flights. No such prohibitions exist under the existing condition. Thus, though there are minor noise increases near these two routes, when appropriately considered within the context of all the operating parameters included in the ATMP that do not exist under the existing condition, the ATMP clearly will not have an adverse effect on historic properties, including those in the vicinity of the Coastal Route and the Kahuku Route.

• The ACHP states, "While the ACHP agrees it is not within FAA's purview to assess effects that occurred prior to its involvement in the ATMP, it cannot reasonably deny that effects from air tours have been occurring to historic properties in the Park. Further, the measures proposed would reduce or minimize the likelihood that noise from an air tour would interrupt Native Hawaiian traditional practices and diminish the integrity of setting and feeling for these historic properties, but the conditions set by the ATMP do not completely avoid these effects. Absent ending air tours altogether, there does not appear to be a way to eliminate the potential for adverse effects."<sup>2</sup>

Impacts from the existing condition of air tours over the Park is the appropriate baseline for determining whether the undertaking (ATMP) will adversely affect historic properties. ACHP correctly acknowledges that it is "not within FAA's purview" to assess the effects of air tours conducted under interim operating authority. However, the ACHP then goes on to state that the agency must acknowledge the effect of existing air tour operations on historic properties in the Park. Though its reasoning is not clear, the ACHP seems to assume that air tour operations under existing conditions have an adverse effect on historic properties.<sup>3</sup> Therefore, the FAA's undertaking must completely ban air tours to remove the adverse effect, and any action that does less than a total ban does not address the adverse effect of air tours. That view goes beyond the authority of the Section 106 process and its implementing regulations.

The Section 106 regulations state that one of the purposes of the Section 106 process is to require Federal agencies "to take into account the *effects of their undertakings* on historic properties and afford the Council [or ACHP] a reasonable opportunity to comment on such undertakings." (Emphasis added) 36 CFR § 800.1(a). Pursuant to Section 106 regulations the FAA assessed the effects of the undertaking, the ATMP, compared to existing conditions. The regulations do not call for an assessment of the existing conditions. As the FAA explained in its request to the ACHP for an opinion on this finding, neither the National Parks Air Tour Management Act (NPATMA) nor the National Historic Preservation Act (NHPA)

<sup>&</sup>lt;sup>2</sup> The ACHP states that any potential for adverse effects is an adverse effect. However, the ACHP does not explain what the "potential" adverse effect could be that the FAA has not already analyzed. The regulations at 36 CFR § 800.1(a) limit the scope of an adverse effect to reasonably foreseeable effects caused by the undertaking, whether the effects are later in time, farther removed in distance or cumulative.

<sup>&</sup>lt;sup>3</sup> ACHP took a different view in their opinion on the Great Smoky Mountains National Park ATMP, where they agreed with the FAA finding of no adverse effect although there was not a total ban of air tours over the park.

require the effects of the undertaking to be measured against a condition under which no air tours are occurring.

Furthermore, neither NPATMA nor NHPA require the agency to assess the effects of the undertaking assuming that the existing conditions already have an adverse effect. This is no different than how a ground-based undertaking would be assessed under Section 106. For example, if the agency had an undertaking that involved a historic building that had been damaged prior to their involvement and were now proposing to fund or permit repairs, the agency would not be required to assess impacts of the repairs compared to how the building existed in its original pristine condition. Making in-kind repairs to improve the condition of the building rather than fully restoring the building to its original condition would not result in an adverse effect. The assessment of effects for the undertaking on the building would be limited just to the effect of the undertaking; the existing condition of the building would be taken into consideration as a factor in determining its integrity and evaluating effects. The agency would not evaluate the effects of the circumstances that led to the damage if it was out of the agency's control (for example, disaster damage is not an undertaking). It is no different with assessing the effects of the ATMP. The FAA correctly measured the effects of the ATMP against the existing condition of commercial air tours over the Park, making no assumptions about the existing conditions, and the proposed finding of no adverse effect is appropriate.

After careful consideration of the ACHP's advisory opinion, the FAA is confirming its finding that the ATMP at Hawai'i Volcanoes National Park would have no adverse effect on historic properties within the APE.

Should you have any questions regarding any of the above, please contact Judith Walker at 202-267-4185 or <u>Judith.Walker@faa.gov</u> and copy the ATMP team at <u>ATMPTeam@dot.gov</u>.

Sincerely,

Jul Slarks

Julie Marks Executive Director (A), AEE-1 FAA Office of Environment and Energy

CCs: John Carse

Betsy Merritt, National Trust for Historic Preservation Christopher Cody, National Trust for Historic Preservation Namaka Whitehead, Kamehameha Schools Keola Lindsey, Kamehameha Schools Neal Desai, National Parks Conservation Association Susan A. Lebo, Hawai'i State Historic Preservation Division Stephanie Hacker, Hawai'i State Historic Preservation Division Jessica Puff, Hawai'i State Historic Preservation Division

## Enclosure

Exhibit 1 – ACHP Opinion Letter, dated August 23, 2023

Final EA – Additional Appendix Materials

# Appendix H – Section 7 Consultation

Concurrence from U.S. Fish and Wildlife Service

Concurrence from National Marine Fisheries Service



# United States Department of the Interior

FISH AND WILDLIFE SERVICE Pacific Islands Fish and Wildlife Office 300 Ala Moana Boulevard, Room 3-122 Honolulu, Hawai'i 96850



In Reply Refer To: 2023-0058774-S7-001

June 16, 2023

Michelle L. Carter, Environmental Protection Specialist WASO-NRSS Environmental Quality Division National Park Service PO Box 25287 Denver, CO 80225

Subject: Informal Consultation for Hawai'i Volcanoes National Park Air Tour Management Plan, Volcano, Hawai'i Island

Dear Michelle Carter:

The U.S. Fish and Wildlife Service (Service) received your request for informal consultation on May 15, 2023, requesting our concurrence with your determination that the proposed actions in the Air Tour Management Plan (ATMP), may affect, but will not adversely affect, the following threatened and endangered species:

- Ōpe'ape'a or Hawaiian hoary bat (Lasiurus cinereus semotus),
- Hawaiian forest birds, including the Hawai'i 'ākepa (*Loxops coccineus*), Hawai'i creeper or 'alawī (*Loxops mana*), 'i'iwi or scarlet honeycreeper (*Drepanis coccinea*), 'akiapōlā'au (*Hemignathus wilsoni*), and 'alalā or Hawaiian crow (*Corvus hawaiiensis*),
- Hawaiian seabirds, including the 'ua'u or Hawaiian petrel (*Pterodroma sandwichensis*), 'a'o or Newell's Townsend's shearwater (*Puffinus auricularis newelli*), and the 'akē'akē or Hawai'i distinct population segment (DPS) of the band-rumped storm-petrel (*Oceanodroma castro*),
- Nēnē or Hawaiian goose (Branta sandvicensis),
- Hawaiian waterbirds, including the ae'o or Hawaiian stilt (*Himantopus mexicanus knudseni*), and the 'alae ke'oke'o or Hawaiian coot (*Fulica americana alai*), and
- Hawaiian sea turtles, including the honu or Green see turtle (Chelonia mydas), loggerhead sea turtle (*Caretta caretta*), leatherback sea turtle (*Dermochelys coriacea*), Olive Ridley sea turtle (*Lepidochelys olivacea*), and honu'ea or Hawksbill sea turtle (*Eretmochelys imbricata*).

# PACIFIC REGION 1

The following species were determined by the action agency to have "No Effect" determinations and are not included in this letter of concurrence (see enclosure):

- Insects, including three species of Hawaiian picture wing flies (*Drosophila digressa*, *Drosophila mulli*, *Drosophila ochrobasis*), the Orangeblack Hawaiian damselfly (*Megalagrion xanthomelas*), and the Anchialine Pool shrimp (*Procaris hawaiana*),
- Federally listed plant species (see enclosed species list).

This letter has been prepared under the authority of, and in accordance with, section 7 of the Endangered Species Act of 1973 (16 U.S.C. 1531*et seq.*) as amended (ESA).

## **Project Description**

The Federal Aviation Administration (FAA), in cooperation with the National Park Service (Park), is developing an Air Tour Management Plan (ATMP) for Hawai'i Volcanoes National Park (Park) for commercial air tour operations. These commercial tours are 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 1/2 mile outside the boundary of a national park... 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 1/2 mile outside the boundary)." On February 14, 2019, Public Employees for Environmental Responsibility and the Hawai'i Coalition Malama Pono filed a petition for writ of mandamus seeking to have the agencies complete air tour management plans 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 United States Court of Appeals for the District of Columbia Circuit granted the petition and ordered the agencies to file a proposed schedule for bringing twenty-three eligible parks, including Hawai'i Volcanoes National Park, into compliance within two years. The D.C. Circuit subsequently entered an order requiring the agencies to propose firm completion dates to bring all parks into compliance; the completion date set for the Park is December 31, 2023.

## Past and Current Commercial Air Tour Activity

Based on reported data from 2017-2019, the average annual number of commercial air tours over the Park is 11,376 flights, which are flown at altitudes ranging from 500 ft. to 1,500 ft. AGL depending on location.

#### Area Affected

The area affected includes all areas associated with the proposed air tour management plan, including the Park and the land within a ½-mile boundary from the Park depicted in Figure 1 and Figure 2. The ATMP applies to all commercial air tours within the action area and commercial air tours are defined as any flight conducted for compensation or hire in a powered aircraft where a purpose of the flight is sightseeing over the Park, during which the aircraft flies:

• Below 5,000 ft. 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 mile laterally from any geographic feature within the Park (unless more than 1/2-mile outside the Park boundary).



Figure 1. Map of Hawaii, HI, and location of Hawai'i Volcanos National Park (nps.gov/havo/planyourvisit/maps.htm)

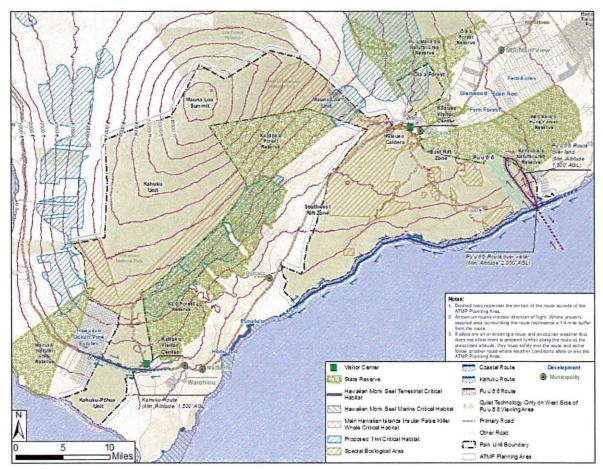


Figure 2. Commercial Air Tour Route at the Park under Proposed action.

# **Proposed Action**

The proposed action is implementation of an ATMP for the Park, which establishes conditions for the management of commercial air tour operations. The draft ATMP will remain in effect until amended, at which time the agencies would reinitiate consultation pursuant to 50 CFR 402.16.

# Commercial Air Tours

The current draft of the ATMP authorizes 1,565 commercial air tours over the Park each year, which is only 14% of the existing number of flights that have been occurring. Going forward under the new plan, flights would only be permitted between the hours of 10:00 AM and 2:00 PM, unless using a quiet technology aircraft. Flights would be permitted on Monday, Tuesday, Thursday, Friday, and Saturday. Air tours would not be allowed on Sundays. Operators that have converted to quiet technology aircraft could request to be allowed to conduct air tours on Wednesdays.

# Commercial Air Tour Routes and Altitudes

The draft ATMP requires aircraft operators to follow a single flight path with a minimum altitude of 1,500 ft. AGL over land and 2,000 ft. AGL over the ocean. Flights more than <sup>1</sup>/<sub>2</sub>-mile outside the Park

boundary are outside of the action area and are subject to the altitude restrictions of the 2008 FAA Hawai'i Air Tour Common Procedures Manual.

There are three designated routes that operators must follow (Figure 2):

- <u>Pu'u'ō'ō Route</u>: Travels on the east rift of Kīlauea in the Pu'u'ō'ō area with a single entry and exit point over the ocean. Operators that have converted to quiet technology aircraft may request to be allowed to conduct air tours in an expanded fly zone directly west of this route near Pu'u'ō'ō (the Pu'u'ō'ō Quiet Technology Zone). The minimum altitude is 1,500 ft. AGL over land and 2,000 ft. AGL over the ocean. Hovering, loitering, and/or circling is allowed for up to five minutes.
- <u>Coastal Route</u>: Bi-directional route offshore along the edge of the park boundary with a 2,000 ft. lateral distance from shore and at minimum altitude of 2,000 ft. AGL. over the ocean.
- <u>Kahuku Route</u>: Bi-directional route across the south side of the Kahuku Unit following Highway 11 at minimum altitude of 1,500 ft. over land.

The draft ATMP limits the number of commercial air tours within the action area to no more than 16 tours per day across all operators. Hovering, loitering, and/or circling for up to five minutes would be permitted only on the Pu'u'ō'ō Route and in the Pu'u'ō'ō Quiet Technology Zone. Circling aircraft would have to turn away from the advancing blade as much as possible to minimize noise. The Park would conduct periodic acoustic monitoring to ensure that the terms and conditions of the ATMP remain consistent with park management objectives.

#### Quiet Technology Incentives

The draft ATMP incentivizes the adoption of quiet technology by commercial air tour operators. Operators that have converted to quiet technology aircraft would be allowed to conduct commercial air tours from 9:00 AM to 5:00 PM (two hours longer than non-quiet technology aircraft) on all days that air tours are authorized. Quiet technology aircraft are permitted to fly on Wednesdays and conduct commercial air tours in additional locations in the Pu'u'ō'ō Quiet Technology Zone.

#### Potential Stressors Associated with Proposed Actions

The proposed action does not include ground-based activities. Therefore, potential stressors to federally listed species would be limited to noise and direct strikes. The draft ATMP includes several provisions to minimize potential noise impacts. The draft ATMP would ensure that noise would not be constant and that there would be substantial time intervals between noise events from air tours by limiting the number of flights each day. The draft ATMP also ensures that large segments of the Park would not be exposed to air tour noise by establishing a designated air tour route.

Noise modeling was completed to estimate noise from commercial air tours under the proposed action for a standard day and a quiet technology only day (Attachment 2, *Noise Technical Analysis*). In summary, the noise modeling for a standard day predicts that the maximum sound pressure level (Lmax) generated by commercial air tours in the Park would be 63.7 dBA and would occur at 'Āpua Point Camp. The Lmax noise metric is event based and does not provide any context of frequency, duration, or timing of exposure. The time above (TA) noise metric specifies the amount of time (in minutes) aircraft sound levels would be above a given noise level during a 24-hour period. The

TA35dBA and TA52dBA were modeled for the proposed action. Based on the modeling, the maximum time that noise from air tours would be above 35 dBA is between 30 and 45 minutes a day, representing 1% of the action area; 29% of the action area would experience noise above 35 dBA for at least 0.1 minutes a day. The maximum time above 52 dBA experienced across all points modeled would be 5.8 minutes, and 87% of points modeled would experience time above 52 dBA for up to 0.8 minutes.

The FAA has established a significance threshold for noise that uses the day-night average sound level (DNL) metric (see FAA Order 1050.1F, Exhibit 4-1). The resultant DNL due to the ATMP is well below the FAA's threshold within the action area. As described in the *Noise Technical Analysis*, contours for equivalent continuous sound level (LAeq) show that the maximum value was less than 45 dBA and affected portions of the action area would generally be 35 to <40 dBA, representing 6% of the total area. DNL will be arithmetically three dB lower than the 12-hour equivalent sound level, and therefore less than 45 dB, as there are no nighttime events at the Park. Figure 3 compares common outdoor and indoor sound levels for context.

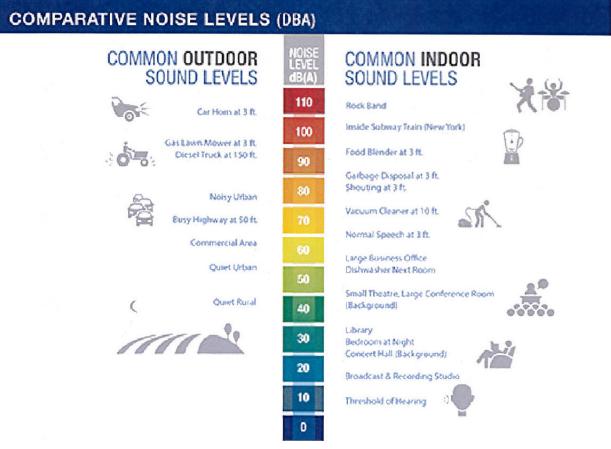


Figure 3. Comparative Noise Levels (FAA 2020)

# Summary of Conservation Measures

The proposed action includes the following measures protective of species:

- Reduces the number of air tours over the Park from 11,376 (three-year average) to 1,565, an 86% reduction.
- Permits flights only between the hours of 10:00 AM and 2:00 PM, unless using a quiet technology aircraft then flights would be permitted from 9:00 AM to 5:00 PM for those aircraft. This proposed window of operation would provide additional protection to wildlife during critical dusk/dawn periods that are prime times of day for foraging, mating, and communication.
- Aircraft will not hover or circle while conducting air tours over the Park, unless on the Pu'u'ō'ō Route and in the Pu'u'ō'ō Quiet Technology Zone where this is permitted for up to five minutes.
- Sets minimum altitudes of 1,500 ft. AGL over land and 2,000 ft. AGL over the ocean, which is an increase of 500 to 1,500 ft. AGL compared to existing operations. This increase in altitude would reduce noise intensity at ground level.
- Adaptive management of the route, frequency, and timing will be considered, analyzed, and included in the draft ATMP for the protection of bird movement patterns and climate change-induced range shifts impacted by air tours.

#### Effects to Listed Species

#### Hawaiian Hoary Bat

Direct strikes and noise impacts are potential impacts to the 'ōpe'ape'a. The possibility of direct strikes is considered discountable because 'ōpe'ape'a are nocturnal and commercial air tours will occur during daylight hours only (between 10:00 AM to 2:00 PM or from 9:00 AM to 5:00 PM if using quiet technology aircraft), so 'ōpe'ape'a would be roosting in trees during the time of day at which air tours occur, and therefore the risk of an aircraft striking a bat would be unlikely to occur. The risk of direct strikes around dusk when this species forages could increase for operators that use quiet technology aircrafts, as flights can be conducted later in the day. However, the risk of a helicopter strike will remain extremely low if operators convert to quiet technology aircraft because the minimum flight altitude would be 1,500 ft. AGL over land and most bat flights would occur near or below the tree canopy height. Therefore, the likelihood of an aircraft striking a bat is extremely low and the effects are considered discountable.

Bats could be intermittently exposed to commercial air tour noise while roosting in trees during the daytime and during the pupping season. Air tours would be limited during the hours of 10:00 AM to 2:00 PM unless the operators have converted to a quiet technology aircraft, which would allow for air tours to occur from 9:00 AM to 5:00 PM. Anthropogenic noise has been found to reduce foraging success of bats. Based on the values for noise used, conditions for commercial air tours under the proposed action are unlikely to inhibit foraging success in bats. Additionally, restrictions on flight altitudes would prevent flights from occurring below 1,500 ft. AGL within the action area, which is greater than the 10 - 15 meters (33 - 49 ft.) that elicited a negative foraging response in bats. Noise associated with commercial air tours would be short in duration and could cause bats within the action area to shift their foraging areas to less noisy areas. The minimum flight altitude would be 1,500 ft. AGL over land under the proposed action, which would limit the intensity of noise exposure. Given the relatively low magnitude and slow onset rate of the air tour helicopter noise, it is unlikely

an 'ōpe'ape'a would abandon a roost site unless the noise were accompanied by visual or tactical cues that may cause a bat to perceive the noise as a threat.

Based on the proposed project design and implementation of Service-recommended avoidance and minimization measures, Hawaiian hoary bats are extremely unlikely to be measurably disrupted from their normal behaviors. Injury or mortality of Hawaiian hoary bats would not occur. The proposed project will not disturb, remove, or trim woody plants 15-ft tall or greater during the bat-pupping season (June 1 through September 15) and barbed wire fencing will not be used above ground level. Therefore, effects to the Hawaiian hoary bat are insignificant.

#### Hawaiian Forest Birds

Hawaiian forest birds could be exposed to intermittent sound and potentially by direct strikes; however, Hawaiian forest bird habitat generally occurs at high elevations. Although Hawaiian forest birds fly at altitudes high enough where they could interact with aircraft, this event is extremely unlikely, as the birds are extremely unlikely to overlap with air space where the tours occur. Noise from commercial air tours would not be chronic due to restrictions on the number of flights per day and the requirement of a designated route. The designated air tour route, caps on the number of daily flights, and time of day restrictions would limit the amount of habitat that is flown over and minimize noise impacts to these species.

Based on implementation of these measures, effects to Hawaiian forest birds from direct strikes would be discountable and impacts from noise would be insignificant. Based on the proposed project design and implementation of Service-recommended avoidance and minimization measures, Hawaiian forest birds are unlikely to be measurably disrupted from their normal behaviors and effects are insignificant.

#### Hawaiian Seabirds

Direct strikes and noise are potential impacts to Hawaiian seabirds. Many seabirds are nocturnal, underground burrow nesters that travel to and from nest sites during the night. Direct strikes could occur if flights are conducted near dusk or dawn. However, under the proposed action, flights are restricted to only occur from 10:00 AM - 2:00 PM, or 9:00 AM - 5:00 PM if using quiet technology aircraft, so the likelihood of an aircraft striking a seabird is extremely low and the effects are considered discountable. Noise from air tours could impact seabirds during their nesting season. However, designated air tour routes, caps on the number of daily flights, and time of day restrictions would limit the amount of nesting habitat that is flown over and minimize impacts to seabirds during the nesting season.

Any potential impact resulting from direct strikes would be discountable and impacts from noise would be insignificant. Based on the proposed project design and implementation of Service-recommended avoidance and minimization measures for Hawaiian seabirds, Hawaiian seabirds traversing the area at night are unlikely to be measurably disrupted from their normal behaviors. Therefore, effects to Hawaiian seabirds are insignificant.

#### Hawaiian Goose

Direct strikes and noise impacts are potential stressors to Hawaiian goose, as this species may occur throughout the Park. According to observations from Park and maintenance staff, low level flight

impacts from administrative flights included birds flushing and agitation of birds at nests. Although direct collisions with aircrafts are possible, the probability is low based on the minimum altitudes in the proposed action. Bird strikes most often occur during the approach and landing of airplanes, however, no take off or landings will occur within the action area. Temporary disturbance has been observed by Park staff when air tours at current altitudes approach or fly low near areas where Hawaiian goose occur, causing them to fly away. Noise can also impact Hawaiian goose during molting, flocking periods, and during their nesting season from October to April.

Under the proposed action, Hawiian goose would be exposed intermittently to audible air tour noise. As discussed above, the minimum flight altitude of 1,500 ft. AGL and other provisions of the draft ATMP would limit exposure to air tour noise. Based on the relatively low magnitude and frequency of exposure, noise is not expected to affect the fitness of individual birds and any effects would be limited. The amount of habitat that is flown over by commercial air tours is limited by the designated route, and the minimum altitudes and daily caps on the number of air tours would limit noise impacts. Therefore, any potential impact resulting from direct strikes would be discountable and impacts from noise would be insignificant.

Based on the proposed project design and implementation of the above Service-recommended avoidance and minimization measures, Hawaiian goose are unlikely to be measurably disrupted from their normal behaviors. We do not expect any nest failure, injury, or mortality of Hawaiian goose. Therefore, effects to the Hawaiian goose are insignificant.

#### Hawaiian Waterbirds

These species do not fly at altitudes high enough that they would be exposed to contact with aircraft used for commercial air tours, which must fly at a minimum of 1,500 ft. AGL over land. Therefore, direct strikes of waterbirds with aircraft are extremely unlikely. Several studies documented that noise from helicopters and fixed-wing aircraft can elicit behavioral responses including flushing and reduced foraging to various waterbird species at close elevations. However, the minimum flight altitude of 1,500 ft. AGL over land and other provisions of the draft ATMP would limit exposure to air tour noise. Based on the relatively low magnitude and frequency of exposure, individual birds exposed to air tour noise would be expected to return to their normal behavior shortly after exposure. Noise from commercial air tours is not expected to affect the fitness of individual birds of conservation concern and any effects would be insignificant. Based on the proposed project design and implementation of Service-recommended avoidance and minimization measures, Hawaiian waterbirds are unlikely to be measurably disrupted from their normal behaviors. Therefore, effects to Hawaiian waterbirds are discountable and insignificant.

#### Hawaiian Sea Turtles

Sea turtles hauled out on shore could be exposed to noise; however, it is unlikely this would elicit a response for individual turtles. Adverse effects have been noted as occurring to sea turtles when flight altitudes are 600 ft. or lower. We do not expect that sea turtles would be measurably disrupted by these flights because the noise levels of the proposed action are well below those found to show a behavioral response. Based on the proposed project design and implementation of Service recommended avoidance and minimization measures for sea turtles, sea turtles are unlikely to be injured, killed, or measurably disrupted from their normal behaviors. Therefore, effects to the sea turtles are discountable.

# Summary

Based on the project description, the draft Environmental Assessment, the incorporation of Servicerecommended avoidance and minimization measures for each of the listed species that occurs or could occur in the project action area, and our assessment of potential project impacts, we anticipate that the potential for adverse effects to listed species are insignificant (undetectable) or discountable (extremely unlikely to occur). We concur with your determination that these proposed activities may affect, but are not likely to adversely affect, the Hawaiian hoary bat, Hawaiian goose, Hawaiian waterbirds, Hawaiian seabirds, and Hawaiian sea turtles. Reinitiation of consultation is required and shall be requested if:

- New information reveals effects of the action that may affect listed species or critical habitat in a manner or to an extent not previously considered;
- The identification action is subsequently modified in a manner that causes an effect to the listed species or critical habitat that was not considered in the written concurrence; or,
- A new species is listed, or critical habitat designated that may be affected by the identified action.

Thank you for participating with us in the protection of our endangered species. If you have any questions, please contact James Yrigoyen at james\_yrigoyen@fws.gov or by telephone at 808-490-1745 or Lindsy Asman, lindsy\_asman@fws.gov, 808-348-3394. When referring to this project, please include this reference number: 2023-0058774-S7-001.

Sincerely,

LINDSY ASMAN Digitally signed by LINDSY ASMAN Date: 2023.06.16 12:16:31 -10'00'

Lindsy Asman Hawaiʻi and Maui Nui Island Team Manager Pacific Islands Fish and Wildlife Office

Enclosure:

cc:	Rhonda Loh, NPS
	Kevin W. Welsh, FAA

altitude of commercial air tours are anticipated to outweigh the *de minimis* impacts from any increase in the area exposed to the noise.

 Adaptive management of the route, frequency, and timing will be considered, analyzed, and included in the draft ATMP for the protection of bird movement patterns and climate changeinduced range shifts impacted by air tours.

#### Listed Species and Critical Habitat Potentially Occurring within the Action Area

The U.S. Fish and Wildlife Service's (USFWS) Information Planning and Consultation (IPaC) tool and the NPS species list were used to assess the potential for any federally listed species or designated critical habitat that may occur within the action area. Species listed in Table 2 are those that are known to occur within the Park. All listed species including those that do not occur in the Park, but were identified via IPaC, can be found in the IPaC Official Species List (Attachment 3).

Birds - Scientific Name	Birds - Common name	Birds - Status (Federal)	Birds - Critical Habitat in the Action Area (Y/N)	Birds - Proposed Finding
Branta (=Nesochen) sandvicensis	Hawaiian Goose (=nēnē)	Threatened		NLAA
Corvus hawaiiensis	'alalā	Endangered	N	NLAA
Drepanis coccinea	ʻl'iwi	Threatened	Proposed	NLAA
Hemignathus wilsoni	'Akiapōlā'au	Endangered	N	NLAA
Loxops coccineus	Hawai'i 'ākepa	Endangered	N	NLAA
Loxops mana	Hawai'i Creeper	Endangered	N	NLAA
Oceanodroma castro	Band-rumped Storm-Petrel	Endangered	N	NLAA
Pterodroma sandwichensis	Hawaiian Petrel	Endangered	N	NLAA
Puffinus newelli	Newell's Shearwater	Threatened	N	NLAA
Reptiles - Scientific Name	Reptiles - Common name	Reptiles - Status (Federal)	Reptiles - Critical Habitat in the Action Area (Y/N)	Reptiles - Proposed Finding
Caretta caretta	Loggerhead Sea Turtle	Endangered	N	NLAA
Chelonia mydas	Green Sea Turtle	Threatened	N	NLAA
Dermochelys coriacea	Leatherback Sea Turtle	Endangered	N	NLAA
Eretmochelys imbricata	Hawksbill Sea Turtle	Endangered	N	NLAA
Lepidochelys olivacea	Olive Ridley Sea Turtle	Threatened	N	NLAA

Table 2. Listed Species and Critical Habitat Potentially Occurring in the Action Area

Mammals - Scientific Name	Mammals- Common name	Mammals - Status (Federal)	Mammals - Critical Habitat in the Action Area (Y/N)	Mammals - Proposed Finding	
Lasiurus semotus	Hawaiian Hoary Bat	Endangered	Ν	NLAA	
Insects - Scientific Name	Insects - Common name	Insects - Status (Federal)	Insects - Critical Habitat in the Action Area (Y/N)	Insects - Proposed Finding	
Drosophila digressa	Hawaiian Picture- wing Fly	Endangered	N	No Effect	
Drosophila mulli	Hawaiian Picture- wing Fly	Threatened	Y	No Effect	
Drosophila ochrobasis	Hawaiian Picture- wing Fly	Endangered	Y	No Effect	
Megalagrion xanthomelas	Orangeblack Hawaiian Damselfly	Endangered	N	No Effect	
Procaris hawaiana	Anchialine Pool Shrimp	Endangered	N	No Effect	
Flowers - Scientific Name	Flowers - Common name	Flowers - Status (Federal)	Flowers - Critical Habitat in the Action Area (Y/N)	Flowers - Proposed Finding	
Argyroxiphium kauense	Mauna Loa (=ka'u) Silversword	=ka'u) Endangered		No Effect	
Clermontia lindseyana	'oha Wai	Endangered	N	No Effect	
Clermontia peleana	'oha Wai	Endangered	N	No Effect	
Cyanea stictophylla	Haha	Endangered	Y	No Effect	
Cyanea tritomantha	'aku	Endangered	N	No Effect	
Cyrtandra giffardii	Ha 'iwale	Endangered	Y	No Effect	
Cyrtandra tintinnabula	Ha'iwale	Endangered	N	No Effect	
Exocarpos menziesii	Heau	Endangered	N	No Effect	
Hibiscadelphus giffardianus	Hau Kuahiwi	Endangered	Y	No Effect	
lschaemum byrone	Hilo Ischaemum	Endangered	Y	No Effect	
Joinvillea ascendens ascendens	'ohe	Endangered	N	No Effect	
Melicope zahlbruckneri	Alani	Endangered	N	No Effect	
Neraudia ovata	No Common Name	Endangered	N	No Effect	
Nothocestrum breviflorum	'aiea	Endangered	N	No Effect	
Ochrosia haleakalae	Holei	Endangered	N	No Effect	
Ochrosia kilaueaensis	Holei	Endangered	N	No Effect	
Phyllostegia floribunda	No Common Name	Endangered	N	No Effect	

Phyllostegia stachyoides	No Common Name	Endangered	Ν	No Effect
Phyllostegia velutina	No Common Name	Endangered	Y	No Effect
Pittosporum hawaiiense	Hoawa	Endangered	Ν	No Effect
Plantago hawaiensis	Kuahiwi Laukahi	Endangered	Y	No Effect
Pleomele hawaiiensis	Hala Pepe	Endangered	Y	No Effect
Portulaca sclerocarpa	Po'e	Endangered	Y	No Effect
Portulaca villosa	Ihi	Endangered	N	No Effect
Pritchardia lanigera	Loulu	Endangered	N	No Effect
Pritchardia maideniana	Loulu	Endangered	N	No Effect
Ranunculus hawaiensis	Makou	Endangered	N	No Effect
Sanicula sandwicensis	No Common Name	Endangered	N	No Effect
Schiedea diffusa subsp. diffusa	No Common Name	Endangered	N	No Effect
Sesbania tomentosa	Ohai	Endangered	Y	No Effect
Sicyos albus	'anunu	Endangered	Y	No Effect
Sicyos macrophyllus	'anunu	Endangered	N	No Effect
Silene hawaiiensis	No Common Name	Threatened	Y	No Effect
Solanum incompletum	Popolo Ku Mai	Endangered	N	No Effect
Spermolepis hawaiiensis	No Common Name	Endangered	N	No Effect
Stenogyne angustifolia var. angustifolia	No Common Name	Endangered	N	No Effect
Zanthoxylum hawaiiense	A'e	Endangered	N	No Effect
Ferns and Allies - Scientific Name	Ferns and Allies - Common Name	Ferns and Allies - Status (Federal)	Ferns and Allies - Critical Habitat in the Action Area (Y/N)	Ferns and Allies - Proposed Finding
Adenophorus periens	Pendant Kihi Fern	Endangered	Y	No Effect
Asplenium peruvianum var. insulare	No Common Name	Endangered	Y	No Effect

#### **Other Protected Native Birds**

Within the action area, there are several bird species that are not listed under the ESA but are protected under the Migratory Bird Treaty Act (MBTA). See Table 3.

Hawai'i 'amakihi (*Chlorodrepanis virens*) is a common, widely distributed omnivorous forest bird most abundant in upland mesic forest and subalpine woodland. The breeding season for Hawai'i 'amakihi occurs from November to May. The Island of Hawai'i hosts a population of over 800,000 birds (Gorresen et al., 2009; Kendall et al., 2022). Based on population trend studies, this species appears to have mixed trends across the Park (Judge et al., 2017).



U.S. DEPARTMENT OF COMMERCE National Oceanic and Atmospheric Administration NATIONAL MARINE FISHERIES SERVICE Pacific Islands Regional Office 1845 Wasp Blvd., Bldg 176 Honolulu, Hawaii 96818 (808) 725-5000 · Fax: (808) 725-5215

May 31, 2023

Danielle Foster National Park Service Hawaii Volcanoes National Park PO Box 52 1 Crater Rim Drive Hawaii National Park, HI 96718-0052

RE: Request for Informal ESA Consultation on National Park Service and Federal Aviation Administration Hawaii Volcanoes National Park Air Tour Management Plan (ATMP) (I-PI-23-2148-DG; PIRO-2022-03604; INQ-2022-00301).

# Dear Ms. Foster:

On May 15, 2023, NOAA's National Marine Fisheries Service (NMFS) received your written request for informal consultation on the National Park Service and Federal Aviation Administration proposed action to authorize the Hawaii Volcanoes National Park Air Tour Management Plan (ATMP), developed in accordance with the National Parks Air Tour Management Act of 2000. Your request, including the biological evaluation assessment, qualified for our expedited review. It met our screening criteria and contained all required information on your proposed action and its potential effects to listed species and designated critical habitat.

We reviewed your consultation request document and related materials. Based on our knowledge, expertise, and the materials you provided, we concur with your conclusions that the proposed action may affect, but is not likely to adversely affect Hawaiian monk seals and their designated critical habitat.

This concludes informal consultation under section 7 of the ESA for species under our jurisdiction. A complete record of this consultation is on file at the Pacific Island Regional Office, Honolulu, Hawaii. Reinitiation of consultation is required and shall be requested by the National Park Service or by NMFS, where discretionary Federal involvement or control over the action has been retained or is authorized by law and if:

- a. Take occurs to an ESA-listed species;
- b. New information reveals effects of the action that may affect ESA-listed species or designated critical habitat in a manner or to an extent not previously considered;
- c. The identified action is subsequently modified in a manner that causes an effect to ESAlisted species or designated critical habitat that was not considered in this concurrence; or
- d. A new species is listed or critical habitat designated that may be affected by the identified action.

If you have further questions, please contact Joshua Rudolph at (808) 725-5147 or joshua.rudolph@noaa.gov. Thank you for working with us to protect our nation's living marine resources.

Sincerely,

Dawn Golden

Dawn Golden Assistant Regional Administrator Protected Resources Division

CC: R. Loh, NPS K. Welsh, FAA M. Carter, NPS

# Final EA – Additional Appendix Materials

# Appendix I – Section 4(f) Analysis

Official with Jurisdiction Letter to U.S. Fish and Wildlife Service

Official with Jurisdiction Letter to Department of Land and Natural Resources (DLNR)

Response Letter from DLNR



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 Hawai'i Volcanoes National Park

Leah Messer U.S. Fish and Wildlife Service 60 Nowelo St., Ste. 100 Hilo, HI 96720

### Dear Leah Messer:

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 Hawai'i Volcanoes National Park (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 Hakalau Forest National Wildlife Refuge, which is a protected property 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 Hawai'i Volcanoes National Park, 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 26,664 air tours per year. The ATMP would 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 11,376 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 would 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: the No Action Alternative,

representing a continuation of what is currently flown (11,376 flights); Alternative 2, which would not authorize air tours in the ATMP planning area;<sup>1</sup> and Alternative 3, which is identified as the Preferred Alternative, an 86% reduction in number of flights from the existing conditions and further described below. The FAA considered the potential for constructive use of Section 4(f) resources under all alternatives but focused the Section 4(f) analysis on the Preferred Alternative (Alternative 3). 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 Park resources including those that unreasonably interfere with ceremonies conducted by Native Hawaiian practitioners at cultural sites, Park programs, activities, the atmosphere of peace and tranquility, and the natural soundscapes in the Park's Wilderness areas. 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. Effects to Section 4(f) resources under Alternative 2 would be expected to be similar or less than those under Alternative 3 as there would be no air tours authorized in the ATMP planning area under this alternative. Therefore, the Section 4(f) analysis does not analyze the potential for constructive use of Section 4(f) resources in detail under Alternative 2. Detailed analysis of Section 4(f) resources is provided for Alternative 3 (Preferred Alternative).

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

- A maximum of 1,565 commercial air tours<sup>2</sup> are authorized per year on the route depicted in **Attachment A**;
- The designated altitudes in **Attachment A** require minimum altitudes of 1,500 ft. AGL over land and 2,000 ft. AGL over the ocean.
- The aircraft types authorized for the commercial air tours includes: CE-337-T337H, CE-421-C, AS-350-B2, EC-130-B4, EC-130-T2, BHT-407-407, BHT-430-430, MD-369-D, MD-369-E, C208B, and AS-350-BA. Any new or replacement aircraft must not exceed the noise level produced by the aircraft being replaced;
- Air tours may operate between 10:00 AM and 2:00 PM local time, except as provided by the quiet technology incentive, on all days of the week except Wednesday and Sunday and designated no-fly days;
- Hovering, loitering, and/or circling for up to five minutes is permitted on the Pu'u'ō'ō Route and in the Pu'u'ō'ō Quiet Technology Zone. Circling aircraft would have to turn away from the advancing blade as much as possible to minimize noise. Hovering, loitering and/or circling is prohibited on the Kahuku Route and the Coastal Route.
- Operators are required to equip all aircraft used for air tours with flight monitoring technology, to use flight monitoring technology during all air tours under the ATMP, and to report flight monitoring data as an attachment to the operator's semi-annual reports, along with the number of commercial air tours conducted;

<sup>&</sup>lt;sup>1</sup> 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.

<sup>&</sup>lt;sup>2</sup> The number of commercial tours authorized under the ATMP is 14% of the 2017-2019 reporting average.

- When made available by Park staff, operators/pilots are required to attend an annual interpretive training when made available by the NPS. The training will include Park information that operators can use to further their own understanding of Park priorities and management objectives as well as enhance the interpretive narrative for air tour clients and increase understanding of Parks by air tour clients;
- Helicopter operators are required to complete the FAA Introduction to Fly Neighborly training, in addition to the above NPS interpretive training;
- At the request of either of the agencies, the Park staff, the FAA Flight Standards District Office (FSDO), and the operators will meet once per year to discuss the implementation of the ATMP and any amendments or other changes to the ATMP; and
- For situational awareness when conducting tours of the Park, the operators will utilize frequency 122.85 and report when they enter the ATMP boundary to begin the route and upon completion of the route. The pilots will identify their company, aircraft, and route to make any other aircraft in the vicinity aware of their position.

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

# Section 4(f)

The Section 4(f) study area for considering Section 4(f) resources for the ATMP consists of the commercial air tour route within the Park and ½-mile outside the boundary of the Park (ATMP planning area) and extends to correspond 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 Section 4(f) study area) was included in the Section 4(f) analysis.

# 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 (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 <sub>Aeq, 12 hr</sub>	The logarithmic average of commercial air tour sound levels, in dBA, 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 <sub>dn</sub> (or	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.					
DNL)	Note: Both L <sub>Aeq, 12hr</sub> and DNL characterize:					
	Increases in both the loudness and duration of noise events					
	• The number of noise events during specific time period (12 hours for L <sub>Aeq, 12hr</sub> and 24-hours for DNL)					
	If there are no nighttime events, then $L_{Aeq, 12hr}$ is arithmetically three dBA higher than DNL as the events are averaged over 24 hours instead of 12 hours.					
	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 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	The total time (minutes) that aircraft noise levels are audible to an attentive listener with normal hearing under natural ambient conditions.					
Ambient	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.					
Time Above 35 dBA	The amount of time (in minutes) that aircraft sound levels are above a given threshold (i.e., 35 dBA).					
	In quiet settings, outdoor sound levels exceeding this level degrade experience in outdoor performance venues (American National Standards Institute (ANSI), 2007);					

Metric	Relevance and citation
	blood pressure increases in sleeping humans (Haralabidis et al., 2008); maximum background noise level inside classrooms (ANSI/Acoustical Society of America S12.60/Part 1-2010).
Time Above 52 dBA	The amount of time (in minutes) that aircraft sound levels are above a given threshold (i.e., 52 dBA).
	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). This metric represents the level at which one may reasonably expect interference with Park interpretive programs, activities that require communication from a distance and other general visitor communication.
Maximum sound level, L <sub>max</sub>	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.

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 the Preferred Alternative operations over the Park occur at low annual operational levels and are highly seasonal in nature, the FAA based the noise analysis on the number of aircraft operations for each aircraft and route proposed under the Preferred Alternative. This approach provides a conservative evaluation of potential noise impacts to Park resources, as well as Section 4(f) resources, under the Preferred Alternative.

The Preferred Alternative would authorize three flight routes with minimum altitude requirements of 1,500 – 2,000 ft. AGL. Air tour routes within the ATMP planning area are represented by a line with a ¼-mile buffer on either side of the route that indicates the acceptable range of deviation that would not trigger enforcement action. For the Park, the peak month average day (PMAD) under existing conditions, as derived from operator reporting, is 48.5 flights. For noise modeling, the number of air tours using these aircraft types and routes are representative of an 86% reduction in PMAD activity under existing conditions:

- Aerospatiale AS-350D, 1 flight on route shown in Attachment A
- Eurocopter EC-130, 3 flights on route shown in Attachment A
- Cessna 208, 1 flight on route shown in Attachment A

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

46 location points, geographically located across the entire Park, where noise levels were to be evaluated (see **Attachment B** for a map of location points in relation to Section 4(f) resources). 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.

The noise analysis indicates that the Preferred Alternative would not result in any noise impacts that would be "reportable" under FAA's policy for the NEPA.<sup>3</sup> Under the Preferred Alternative, commercial air tours are restricted to designated routes and minimum altitudes of 1,500 ft. AGL over land and 2,000 ft. AGL over the ocean. The number of flights authorized in the Preferred Alternative is a substantial reduction from the three-year average for 2017-2019. The resultant DNL due to the Preferred Alternative is expected to be below DNL 45 dB and would eliminate or reduce noise in many noise sensitive regions of the ATMP planning area compared to current conditions.

As indicated by the supplemental noise metrics, some points overlapping with or near Section 4(f) resources may experience an increase in noise intensity or duration as compared to existing conditions as routes include flights near these resources under the Preferred Alternative. For parks and recreational sites that are Section 4(f) properties, at some points that are closest to the authorized routes under the Preferred Alternative (Points 9, 10, 14, 17, 18, 20, 24, 31, 39, 40, 41,) time above 35 dBA or 52 dBA may be higher for quiet technology-only days compared to standard days because some quiet technology aircraft, while quieter overall, may be audible for a slightly longer period of time than standard aircraft based on the specific route location and type of aircraft modeled. Of the Section 4(f) park and recreational sites that are within the Section 4(f) study area, this would be most likely to affect Kahauale'a Natural Area Reserve, Keaoi Islet Seabird Sanctuary, and State Resource Management Area which are located closest to these modeled location points and the routes for the Preferred Alternative.

Based on the noise analysis, nine location points (14, 17, 18, 19, 20, 24, 39, 40, 41) are anticipated to experience increases in noise under both standard and quiet technology-only days as indicated by the supplemental metrics (time audible natural ambient, time above 35 dBA, time above 52 dBA, maximum sound level) as compared to current conditions. The FAA identified whether these points were near any parks and recreational Section 4(f) properties (refer **Attachment B** for the Section 4(f) location point analysis):

- Point 24 is within 1.10 miles of the Ka'ū Forest Reserve and within 0.77 miles of the State Resource Management Area;
- Point 39 is within 0.27 miles of the Keaoi Islet Seabird Sanctuary;
- Point 40 is within 1.47 miles of the Keaoi Islet Seabird Sanctuary.
- At the location point closest to the Hakalau Forest National Wildlife Refuge (Point 22, 1.18 miles), there is no expected increase in noise under the Preferred Alternative. The time above

<sup>&</sup>lt;sup>3</sup> Per FAA Order 1050.1F, the FAA refers to noise changes meeting the following criteria as "reportable": for DNL 65 dB and higher, ± DNL 1.5 dB; for DNL 60 dB to <65 dB, ± DNL 3 dB; for DNL 45 dB to <60 dB, ± DNL 5 dB. See 1050.1F Desk Reference, Section 11.3.

52 dBA (associated with speech interference) at Point 22 was modeled to be 0 minutes on both standard and quiet technology-only days.

The FAA then evaluated the supplemental noise metrics to determine changes in noise duration and intensity that would be experienced at those Section 4(f) properties under the Preferred Alternative compared to existing conditions. Points 24 and 40 would experience increases in noise duration under all conditions but increases in noise intensity (as indicated by maximum sound level) would only occur on standard days on which air tours would be permitted. Increases in noise intensity either do not occur or are minimal (< 3 dBA) on quiet technology-only days. The increases in 'Time Above' metrics are minimal (at Point 24, time above 35 dBA would increase from 1.8 to 10.9 minutes; time above 52 dBA would increase from 2.2 to 7.7 minutes; time above 52 dBA would increase from 0.2 to 0.8 minutes). The time audible for natural ambient would increase at these points but less on quiet technology-only days (at Point 24, increase from 10.2 minutes to 46.6 minutes on a standard day and 37.7 minutes on a quiet technology-only day). Note that in all cases, these durations are the summation of several non-contiguous events that would span across the operating day.

Point 39 represents a coastal point near the Keaoi Islet Seabird Sanctuary, and noise at Point 39 would increase for all modeled noise metrics. Specifically, the maximum sound level would increase by 2 dBA on quiet technology days and almost 8 dBA on standard days, with the highest level at 60.7 dBA. Time above 35 dBA and 52 dBA would slightly increase under the Preferred Alternative based on the modeling results, with time above 35 dBA experienced for a total of 7 minutes on a standard day and 10 minutes on a quiet technology-only day, and time above 52 dBA experienced for 1 minute on both a standard day and on a quiet technology-only day. At Point 39, air tours would be audible for 36 minutes on quiet technology-only days and about an hour (61 minutes) on standard days.

Because noise is modeled using conservative assumptions and implementing the ATMP under the Preferred Alternative would result in limiting the number of flights to 14% of the three-year average of flights flown from 2017-2019 using three consolidated routes and the same aircraft to fly at higher altitudes than existing conditions, noise impacts to Section 4(f) parks and recreational resources are expected to experience an overall reduction under the Preferred Alternative. Air tours are currently occurring in these areas, and the Preferred Alternative would substantially reduce the number of air tours within the ATMP planning area, move the air tours away from most Section 4(f) resources in the Section 4(f) study area, and increase the altitude at which air tours must fly. Although the Preferred Alternative would shift authorized air tour operations to the three proposed flight paths and may expose some Section 4(f) resources to increased noise impacts, any increases in noise impacts would not result in substantial impairment of these Section 4(f) resources. The inclusion of no-fly days, time-of-day restrictions to avoid sunrise and sunset, quiet technology incentives, and limiting flights to certain days of the week minimizes impacts to Section 4(f) resources. Furthermore, air tours are transitory in nature, and any noise impacts would be temporary, infrequent, and in many cases less intrusive than existing conditions in the Section 4(f) study area.

The FAA also considered the potential for vibrational impacts on Section 4(f) resources under the Preferred Alternative. 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, 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 the Preferred Alternative would be well below recommended limits.<sup>4, 5</sup> 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.

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 and vibrational effects by the implementation of Preferred Alternative. The Preferred Alternative would not result in significant or reportable increase in noise at the Park. Likewise, vibrational impacts from air tour overflights would be minimal. These findings support the FAA's determination that implementation of the Proposed Action would not constitute a constructive use of Section 4(f) resources in the Section 4(f) study 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 Section 4(f) study area. The Preferred Alternative limits the number of commercial air tours to 1,565 flights per year (an 86% reduction compared to the No Action Alternative) and would limit those flights to three designated flight paths. These restrictions which would result in fewer areas of the Section 4(f) study area, and therefore, fewer Section 4(f) properties, from which a commercial air tour could be visible. The Preferred Alternative 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 of Section 4(f) resources.

# **Preliminary Finding**

The FAA has preliminarily determined the Preferred Alternative would not substantially diminish or impair the protected activities, features, or attributes of the Section 4(f) resources in the Section 4(f) study area; therefore, based on the analysis above, FAA intends to make a determination of no constructive use of Hakalau Forest National Wildlife 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.

<sup>&</sup>lt;sup>4</sup> Hanson, C.E., King, K.W., et al., "Aircraft Noise Effects on Cultural Resources: Review of Technical Literature," NPOA Report No. 91-3 (HMMH Report No.290940.04-1), September 1991.

<sup>&</sup>lt;sup>5</sup> 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.

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

Sincerely,

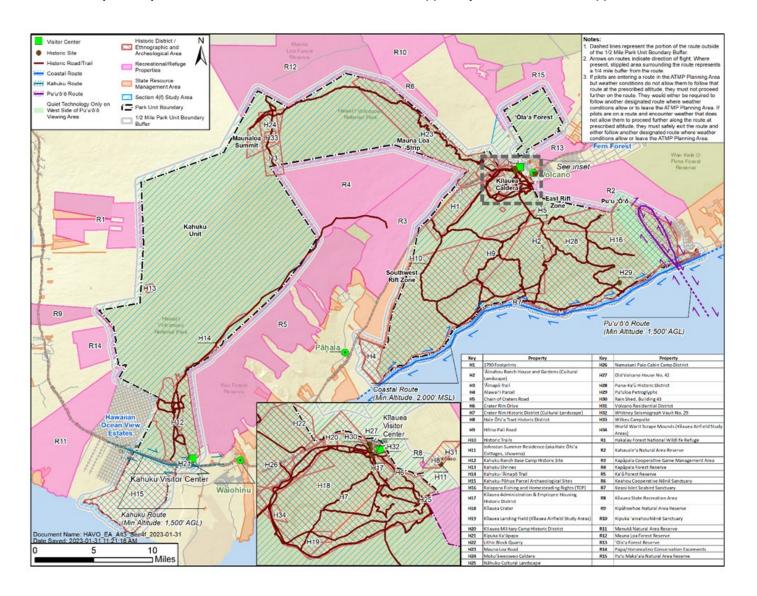
Eric Elmore Senior Policy Advisor Office of Environment and Energy Federal Aviation Administration

Attachments

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

#### ATTACHMENT A

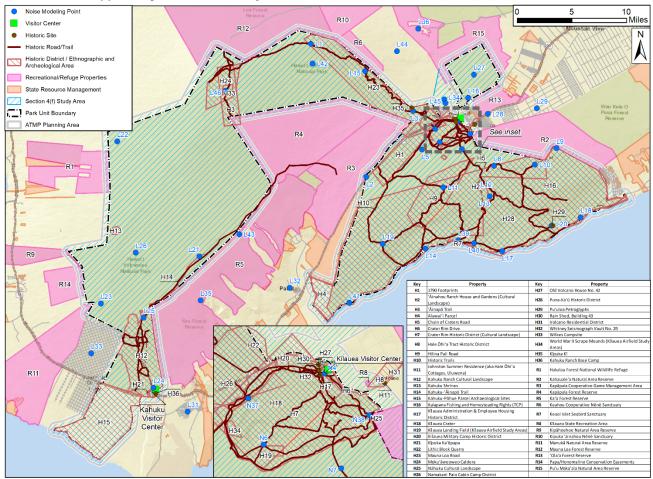
#### Map of Proposed Commercial Air Tour Routes, Section 4(f) study area, and Section 4(f) Resources



### ATTACHMENT B

### Section 4(f) Location Point Analysis

To assess time above 52 dBA at Section 4(f) resources under the Preferred Alternative, 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 1shows the low and high modelled time above 52 dB values under the Preferred Alternative at each Section 4(f) resource. Table 2shows the distance between each Section 4(f) resource and nearby location point and the time above 52 dB at the corresponding location point. A distance of 0.0 miles indicates that the location point falls within the Section 4(f) property. The longest time above 52 dB in the Section 4(f) study area is 5.8 minutes on standard days and 9.7 minutes on quiet technology (QT)-only days.



Section 4(f) Study Area and Properties for ATMP at Hawai'i Volcanoes National Park

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

Section 4(f) Resource	Time Above 52 dBA – Low, Standard Day (minutes)	Time Above 52 dBA – High, Standard Day (minutes)	Time Above 52 dBA – Low, QT Day (minutes)	Time Above 52 dBA – High, QT Day (minutes)
1790 Footprints	0.0	0.0	0.0	0.0
'Āinapō Trail	0.0	0.0	0.0	0.0
'Āinahou Ranch House and Gardens (Cultural Landscape)	0.0	0.0	0.0	0.0
Chain of Craters Road	0.0	1.5	0.0	1.4
Crater Rim Drive	0.0	0.0	0.0	0.0
Crater Rim Historic District (Cultural Landscape)	0.0	0.0	0.0	0.0
Hakalau Forest National Wildlife Refuge	0.0	0.0	0.0	0.0
Hale Ōhi'a Tract Historic District	0.0	0.0	0.0	0.0
Hilina Pali Road	0.0	0.0	0.0	0.0
Historic Trails	0.0	2.1	0.0	2.5
Johnston Summer Residence (aka Hale Ōhi'a Cottages, Uluwena)	0.0	0.0	0.0	0.0
Kahauale'a Natural Area Reserve	0.0	5.8	0.0	9.7
Kahuku Ranch Cultural Landscape	0.0	0.7	0.0	0.0
Kahuku-Pōhue Parcel Archaeological Sites	0.0	0.7	0.0	0.0
Kahuku-'Āinapō Trail	0.0	0.7	0.0	0.0
Kalapana Fishing and Homesteading Rights (TCP)	0.0	5.8	0.0	9.7
Kapāpala Cooperative Game Management Area	0.0	0.0	0.0	0.0
Ka'ū Forest Reserve	0.0	0.7	0.0	0.0
Keahou Cooperative Nēnē Sanctuary	0.0	0.0	0.0	0.0
Keaoi Islet Seabird Sanctuary	0.8	1.2	0.4	1.2
, Kilauea Military Camp Historic District	0.0	0.0	0.0	0.0
Kīlauea Administration & Employee Housing Historic District	0.0	0.0	0.0	0.0
Kīlauea Crater	0.0	0.0	0.0	0.0

Table 1. Low and high modelled values for Time Above 52 dB under the Preferred Alternative for Section 4(f) resources. Noise modeling results are shown for a standard day and quiet technology-only day.

Section 4(f) Resource	Time Above 52 dBA – Low, Standard Day (minutes)	Time Above 52 dBA – High, Standard Day (minutes)	Time Above 52 dBA – Low, QT Day (minutes)	Time Above 52 dBA – High, QT Day (minutes)
Kīlauea Landing Field (Kīlauea Airfield Study Areas)	0.0	0.0	0.0	0.0
Kīlauea State Recreation Area	0.0	0.0	0.0	0.0
Kīpuka Ka'ōpapa	0.0	0.7	0.0	0.0
Lithic Block Quarry	0.0	0.0	0.0	0.0
Manukā Natural Area Reserve	0.0	0.0	0.0	0.0
Mauna Loa Forest Reserve	0.0	0.0	0.0	0.0
Mauna Loa Road	0.0	0.0	0.0	0.0
Moku'āweoweo Caldera	0.0	0.0	0.0	0.0
Namakani Paio Cabin Camp District	0.0	0.0	0.0	0.0
Nāhuku (Thurston Lava Tube) Cultural Landscape	0.0	0.0	0.0	0.0
'Ola'a Forest Reserve	0.0	0.0	0.0	0.0
Old Volcano House No. 42	0.0	0.0	0.0	0.0
Puna-Ka'ū Historic District	0.0	5.8	0.0	9.7
Pu'uloa Petroglpyhs	0.0	0.0	0.0	0.0
Pu'u Maka'ala Natural Area Reserve	0.0	0.0	0.0	0.0
Rain Shed, Building 43	0.0	0.0	0.0	0.0
State Resource Management Area (SRMA)	0.0	0.7	0.0	0.0
Volcano Residential District	0.0	0.0	0.0	0.0
Whitney Seismograph Vault No. 29	0.0	0.0	0.0	0.0
Wilkes Campsite	0.0	0.0	0.0	0.0
World War II Scrape Mounds (Kīlauea Airfield Study Areas)	0.0	0.0	0.0	0.0

Section 4(f) Resource	Location Point ID	Location Point Name	Distance to Location Point (Miles)	Time Above 52 dBA, Standard Day (Minutes)	Time Above 52 dBA, QT Day (Minutes)
1790 Footprints	2	Vicinity of Halfway House	0.71	0.0	0.0
1790 Footprints	3	Kipuka Puaulu	1.12	0.0	0.0
1790 Footprints	5	Cone Peak, Nene Area	0.45	0.0	0.0
1790 Footprints	6	Halemaumau Crater	1.25	0.0	0.0
1790 Footprints	37	Nahuku (Thurston Lava Tube)	0.90	0.0	0.0
Chain of Craters Road	7	Puhimau Hot Spot	0.02	0.0	0.0
Chain of Craters Road	8	Puʻ u Huluhulu View Pt.	1.18	0.0	0.0
Chain of Craters Road	12	Ainahou Ranch	0.76	0.0	0.0
Chain of Craters Road	13	Kipuka Kahalii	0.52	0.0	0.0
Chain of Craters Road	18	End of Road / Visitor Use	1.19	1.5	1.4
Chain of Craters Road	20	Puʻu Loa Petroglpyhs	0.48	0.0	0.0
Chain of Craters Road	38	Jaggar/HVO	1.09	0.0	0.0
Crater Rim Drive	4	Park HQ Developed Area	0.03	0.0	0.0
Crater Rim Drive	5	Cone Peak, Nene Area	1.03	0.0	0.0
Crater Rim Drive	6	Halemaumau Crater	0.04	0.0	0.0
Crater Rim Drive	7	Puhimau Hot Spot	0.86	0.0	0.0
Crater Rim Drive	37	Nahuku (Thurston Lava Tube)	0.12	0.0	0.0
Crater Rim Drive	38	Jaggar/HVO	0.0	0.0	0.0
Crater Rim Historic District (Cultural Landscape)	4	Park HQ Developed Area	0.0	0.0	0.0

Table 2. Section 4(f) resources and corresponding location point data for air tours under the Preferred Alternative. Noise modeling results are shown for a standard day and quiet technology (QT)-only day.

Section 4(f) Resource	Location Point ID	Location Point Name	Distance to Location Point (Miles)	Time Above 52 dBA, Standard Day (Minutes)	Time Above 52 dBA, QT Day (Minutes)
Crater Rim Historic District (Cultural Landscape)	5	Cone Peak, Nene Area	0.97	0.0	0.0
Crater Rim Historic District (Cultural Landscape)	6	Halemaumau Crater	0.0	0.0	0.0
Crater Rim Historic District (Cultural Landscape)	7	Puhimau Hot Spot	0.65	0.0	0.0
Crater Rim Historic District (Cultural Landscape)	37	Nahuku (Thurston Lava Tube)	0.0	0.0	0.0
Crater Rim Historic District (Cultural Landscape)	38	Jaggar/HVO	0.0	0.0	0.0
Crater Rim Historic District (Cultural Landscape)	45	Keauhou Bird Conservation Center	1.21	0.0	0.0
Hakalau Forest National Wildlife Refuge	22	Northwest Kahuku	1.18	0.0	0.0
Hale Ōhi'a Tract Historic District	4	Park HQ Developed Area	1.43	0.0	0.0
Hale Ōhi'a Tract Historic District	38	Jaggar/HVO	0.95	0.0	0.0
Hilina Pali Road	7	Puhimau Hot Spot	1.07	0.0	0.0
Hilina Pali Road	11	Kulanaokuaiki Camp	0.0	0.0	0.0
Historic Trails	1	Red Hill	0.0	0.0	0.0
Historic Trails	2	Vicinity of Halfway House	1.24	0.0	0.0
Historic Trails	3	Kipuka Puaulu	0.95	0.0	0.0
Historic Trails	4	Park HQ Developed Area	0.08	0.0	0.0
Historic Trails	5	Cone Peak, Nene Area	0.35	0.0	0.0
Historic Trails	6	Halemaumau Crater	0.01	0.0	0.0
Historic Trails	7	Puhimau Hot Spot	0.64	0.0	0.0

Section 4(f) Resource	Location Point ID	Location Point Name	Distance to Location Point (Miles)	Time Above 52 dBA, Standard Day (Minutes)	Time Above 52 dBA, QT Day (Minutes)
Historic Trails	8	Puʻ u Huluhulu View Pt.	0.03	0.0	0.0
Historic Trails	10	Napau Wilderness Camp	0.0	0.0	0.0
Historic Trails	11	Kulanaokuaiki Camp	0.04	0.0	0.0
Historic Trails	13	Kipuka Kahalii	0.36	0.0	0.0
Historic Trails	14	Kaaha Wilderness Camp	0.27	1.4	1.6
Historic Trails	15	Top of Strip Road	0.16	0.0	0.0
Historic Trails	17	Apua Pt. Camp	0.11	2.1	2.5
Historic Trails	19	Kipuka Pepeiao Wilderness Camp	0.03	0.0	0.0
Historic Trails	20	Puʻu Loa Petroglpyhs	0.01	0.0	0.0
Historic Trails	24	Upper Reservoir Kahuku	1.17	0.7	0.0
Historic Trails	25	Frontcountry Kahuku	1.23	0.0	0.0
Historic Trails	37	Nahuku (Thurston Lava Tube)	0.06	0.0	0.0
Historic Trails	38	Jaggar/HVO	0.0	0.0	0.0
Historic Trails	39	Halape Wilderness Camp	0.0	1.2	1.2
Historic Trails	40	Keauhou Camp	0.02	0.8	0.4
Historic Trails	46	Mauna Loa Wilderness Camp	0.02	0.0	0.0
Johnston Summer Residence (aka Hale Ōhi'a Cottages, Uluwena)	38	Jaggar/HVO	0.94	0.0	0.0
Kahauale'a Natural Area Reserve	7	Puhimau Hot Spot	1.33	0.0	0.0

Section 4(f) Resource	Location Point ID	Location Point Name	Distance to Location Point (Miles)	Time Above 52 dBA, Standard Day (Minutes)	Time Above 52 dBA, QT Day (Minutes)
Kahauale'a Natural Area Reserve	8	Puʻ u Huluhulu View Pt.	1.45	0.0	0.0
Kahauale'a Natural Area Reserve	9	Pu' u Oo	0.05	5.8	9.7
Kahauale'a Natural Area Reserve	10	Napau Wilderness Camp	0.60	0.0	0.0
Kahauale'a Natural Area Reserve	28	Volcano Village	1.26	0.0	0.0
Kahauale'a Natural Area Reserve	29	Fern Forest	0.60	0.0	0.0
Kahauale'a Natural Area Reserve	38	Jaggar/HVO	0.05	0.0	0.0
Kahuku Ranch Cultural Landscape	21	Nene Cabin Kahuku	0.03	0.0	0.0
Kahuku Ranch Cultural Landscape	24	Upper Reservoir Kahuku	0.0	0.7	0.0
Kahuku Ranch Cultural Landscape	25	Frontcountry Kahuku	0.0	0.0	0.0
Kahuku-Pōhue Parcel Archaeological Sites	24	Upper Reservoir Kahuku	1.29	0.7	0.0
Kahuku-'Āinapō Trail	21	Nene Cabin Kahuku	0.25	0.0	0.0
Kahuku-'Āinapō Trail	24	Upper Reservoir Kahuku	1.40	0.7	0.0
Kahuku-'Āinapō Trail	25	Frontcountry Kahuku	0.01	0.0	0.0
Kahuku-'Āinapō Trail	43	Endangered Forest Bird Habitat 1	0.47	0.0	0.0
Kalapana Fishing and Homesteading Rights (TCP)	8	Pu' u Huluhulu View Pt.	1.01	0.0	0.0
Kalapana Fishing and Homesteading Rights (TCP)	9	Pu' u Oo	0.0	5.8	9.7
Kalapana Fishing and Homesteading Rights (TCP)	10	Napau Wilderness Camp	0.96	0.0	0.0

Section 4(f) Resource	Location Point ID	Location Point Name	Distance to Location Point (Miles)	Time Above 52 dBA, Standard Day (Minutes)	Time Above 52 dBA, QT Day (Minutes)
Kalapana Fishing and Homesteading Rights (TCP)	12	Ainahou Ranch	0.77	0.0	0.0
Kalapana Fishing and Homesteading Rights (TCP)	13	Kipuka Kahalii	0.0	0.0	0.0
Kalapana Fishing and Homesteading Rights (TCP)	17	Apua Pt. Camp	0.0	2.1	2.5
Kalapana Fishing and Homesteading Rights (TCP)	18	End of Road / Visitor Use	0.0	1.5	1.4
Kalapana Fishing and Homesteading Rights (TCP)	20	Puʻu Loa Petroglpyhs	0.0	0.0	0.0
Kalapana Fishing and Homesteading Rights (TCP)	39	Halape Wilderness Camp	0.0	1.2	1.2
Kalapana Fishing and Homesteading Rights (TCP)	40	Keauhou Camp	0.0	0.8	0.4
Kapāpala Cooperative Game Management Area	2	Vicinity of Halfway House	0.04	0.0	0.0
Kapāpala Cooperative Game Management Area	3	Kipuka Puaulu	0.89	0.0	0.0
Ka'ū Forest Reserve	21	Nene Cabin Kahuku	0.71	0.0	0.0
Ka'ū Forest Reserve	24	Upper Reservoir Kahuku	1.10	0.7	0.0
Ka'ū Forest Reserve	25	Frontcountry Kahuku	0.74	0.0	0.0
Ka'ū Forest Reserve	35	Kau Forest Reserve	0.0	0.0	0.0
Ka'ū Forest Reserve	43	Endangered Forest Bird Habitat 1	0.0	0.0	0.0
Keahou Cooperative Nēnē Sanctuary	15	Top of Strip Road	0.44	0.0	0.0

Section 4(f) Resource	Location Point ID	Location Point Name	Distance to Location Point (Miles)	Time Above 52 dBA, Standard Day (Minutes)	Time Above 52 dBA, QT Day (Minutes)
Keaoi Islet Seabird Sanctuary	39	Halape Wilderness Camp	0.27	1.2	1.2
Keaoi Islet Seabird Sanctuary	40	Keauhou Camp	1.47	0.8	0.4
Kilauea Military Camp Historic District	4	Park HQ Developed Area	0.98	0.0	0.0
Kilauea Military Camp Historic District	37	Nahuku (Thurston Lava Tube)	1.12	0.0	0.0
Kilauea Military Camp Historic District	45	Keauhou Bird Conservation Center	1.19	0.0	0.0
Kīlauea Administration & Employee Housing Historic District	4	Park HQ Developed Area	0.0	0.0	0.0
Kīlauea Administration & Employee Housing Historic District	38	Jaggar/HVO	1.26	0.0	0.0
Kīlauea Crater	4	Park HQ Developed Area	0.0	0.0	0.0
Kīlauea Crater	5	Cone Peak, Nene Area	1.10	0.0	0.0
Kīlauea Crater	6	Halemaumau Crater	0.0	0.0	0.0
Kīlauea Crater	7	Puhimau Hot Spot	1.44	0.0	0.0
Kīlauea Crater	34	Volcano Golf Course Community	1.04	0.0	0.0
Kīlauea Crater	37	Nahuku (Thurston Lava Tube)	0.0	0.0	0.0
Kīlauea Crater	38	Jaggar/HVO	0.94	0.0	0.0
Kīlauea Crater	45	Keauhou Bird Conservation Center	0.68	0.0	0.0
Kīlauea Landing Field (Kīlauea	6	Halemaumau Crater	0.03	0.0	0.0

Section 4(f) Resource	Location Point ID	Location Point Name	Distance to Location Point (Miles)	Time Above 52 dBA, Standard Day (Minutes)	Time Above 52 dBA, QT Day (Minutes)
Airfield Study Areas)					
Kīlauea Landing Field (Kīlauea Airfield Study Areas)	37	Nahuku (Thurston Lava Tube)	1.30	0.0	0.0
Kīlauea State Recreation Area	4	Park HQ Developed Area	1.09	0.0	0.0
Kīlauea State Recreation Area	38	Jaggar/HVO	0.77	0.0	0.0
Kīpuka Ka'ōpapa	24	Upper Reservoir Kahuku	0.56	0.7	0.0
Lithic Block Quarry	3	Kipuka Puaulu	1.07	0.0	0.0
Lithic Block Quarry	4	Park HQ Developed Area	1.26	0.0	0.0
Lithic Block Quarry	6	Halemaumau Crater	1.20	0.0	0.0
Lithic Block Quarry	34	Volcano Golf Course Community	1.11	0.0	0.0
Lithic Block Quarry	37	Nahuku (Thurston Lava Tube)	0.0	0.0	0.0
Lithic Block Quarry	45	Keauhou Bird Conservation Center	0.92	0.0	0.0
Manukā Natural Area Reserve	23	Pu'u Ohohia	0.65	0.0	0.0
Manukā Natural Area Reserve	33	Ocean View Community	1.45	0.0	0.0
Mauna Loa Forest Reserve	1	Red Hill	0.89	0.0	0.0
Mauna Loa Road	1	Red Hill	0.0	0.0	0.0
Mauna Loa Road	3	Kipuka Puaulu	0.0	0.0	0.0
Mauna Loa Road	4	Park HQ Developed Area	1.07	0.0	0.0
Mauna Loa Road	5	Cone Peak, Nene Area	1.44	0.0	0.0
Mauna Loa Road	6	Halemaumau Crater	1.32	0.0	0.0

Section 4(f) Resource	Location Point ID	Location Point Name	Distance to Location Point (Miles)	Time Above 52 dBA, Standard Day (Minutes)	Time Above 52 dBA, QT Day (Minutes)
Mauna Loa Road	15	Top of Strip Road	0.0	0.0	0.0
Mauna Loa Road	37	Nahuku (Thurston Lava Tube)	0.03	0.0	0.0
Mauna Loa Road	42	Petrel Breeding Area	1.05	0.0	0.0
Mauna Loa Road	45	Keauhou Bird Conservation Center	1.35	0.0	0.0
Moku'āweoweo Caldera	46	Mauna Loa Wilderness Camp	0.0	0.0	0.0
Namakani Paio Cabin Camp District	37	Nahuku (Thurston Lava Tube)	0.61	0.0	0.0
Nāhuku (Thurston Lava Tube) Cultural Landscape	38	Jaggar/HVO	0.0	0.0	0.0
Old Volcano House No. 42	4	Park HQ Developed Area	0.17	0.0	0.0
Puna-Ka'ū Historic District	8	Puʻ u Huluhulu View Pt.	0.0	0.0	0.0
Puna-Ka'ū Historic District	9	Pu' u Oo	0.0	5.8	9.7
Puna-Ka'ū Historic District	10	Napau Wilderness Camp	0.0	0.0	0.0
Puna-Ka'ū Historic District	11	Kulanaokuaiki Camp	0.0	0.0	0.0
Puna-Ka'ū Historic District	12	Ainahou Ranch	0.0	0.0	0.0
Puna-Ka'ū Historic District	13	Kipuka Kahalii	0.0	0.0	0.0
Puna-Ka'ū Historic District	14	Kaaha Wilderness Camp	0.0	1.4	1.6
Puna-Ka'ū Historic District	17	Apua Pt. Camp	0.0	2.1	2.5
Puna-Ka'ū Historic District	18	End of Road / Visitor Use	0.0	1.5	1.4
Puna-Ka'ū Historic District	19	Kipuka Pepeiao	0.0	0.0	0.0

Section 4(f) Resource	Location Point ID	Location Point Name	Distance to Location Point (Miles)	Time Above 52 dBA, Standard Day (Minutes)	Time Above 52 dBA, QT Day (Minutes)
		Wilderness Camp			
Puna-Ka'ū Historic District	20	Pu' u Loa Petroglpyhs	0.0	0.0	0.0
Puna-Ka'ū Historic District	39	Halape Wilderness Camp	0.0	1.2	1.2
Puna-Ka'ū Historic District	40	Keauhou Camp	0.0	0.8	0.4
Puna-Ka'ū Historic District	41	Great Crack Coastal Fishing Camp	0.0	2	2.3
Pu'uloa Petroglpyhs	20	Puʻu Loa Petroglpyhs	0.11	0.0	0.0
Pu'u Maka'ala Natural Area Reserve	34	Volcano Golf Course Community	1.45	0.0	0.0
Pu'u Maka'ala Natural Area Reserve	36	Olaa Kilauea Forest Partnership	0.0	0.0	0.0
Rain Shed, Building 43	4	Park HQ Developed Area	0.29	0.0	0.0
Volcano Residential District	4	Park HQ Developed Area	1.19	0.0	0.0
Volcano Residential District	28	Volcano Village	0.82	0.0	0.0
Volcano Residential District	38	Jaggar/HVO	0.75	0.0	0.0
Whitney Seismograph Vault No. 29	4	Park HQ Developed Area	0.11	0.0	0.0
Wilkes Campsite	46	Mauna Loa Wilderness Camp	0.0	0.0	0.0
World War II Scrape Mounds (Kīlauea Airfield Study Areas)	4	Park HQ Developed Area	1.40	0.0	0.0
World War II Scrape Mounds (Kīlauea Airfield Study Areas)	5	Cone Peak, Nene Area	1.16	0.0	0.0

Section 4(f) Resource	Location Point ID	Location Point Name	Distance to Location Point (Miles)	Time Above 52 dBA, Standard Day (Minutes)	Time Above 52 dBA, QT Day (Minutes)
World War II Scrape Mounds (Kīlauea Airfield Study Areas)	6	Halemaumau Crater	0.60	0.0	0.0
World War II Scrape Mounds (Kīlauea Airfield Study Areas)	37	Nahuku (Thurston Lava Tube)	0.53	0.0	0.0
'Ola'a Forest Reserve	16	Ola'a Transect 19	0.37	0.0	0.0
'Ola'a Forest Reserve	28	Volcano Village	0.03	0.0	0.0
'Ola'a Forest Reserve	29	Fern Forest	1.33	0.0	0.0
'Āinapō Trail	46	Mauna Loa Wilderness Camp	0.0	0.0	0.0
'Āinahou Ranch House and Gardens (Cultural Landscape)	12	'Ainahou Ranch	0.0	0.0	0.0
'Āinahou Ranch House and Gardens (Cultural Landscape)	13	Kipuka Kahalii	1.48	0.0	0.0
State Resource Management Area	2	Vicinity of Halfway House	0.32	0.0	0.0
State Resource Management Area	4	Park HQ Developed Area	1.00	0.0	0.0
State Resource Management Area	16	Ola'a Transect 19	1.20	0.0	0.0
State Resource Management Area	24	Upper Reservoir Kahuku	0.77	0.7	0.0
State Resource Management Area	28	Volcano Village	0.03	0.0	0.0
State Resource Management Area	29	Fern Forest	1.47	0.0	0.0
State Resource Management Area	30	Kalapana	1.12	0.0	0.0
State Resource Management Area	31	Discovery Harbor, Naalehu	0.79	0.0	0.0

Section 4(f) Resource	Location Point ID	Location Point Name	Distance to Location Point (Miles)	Time Above 52 dBA, Standard Day (Minutes)	Time Above 52 dBA, QT Day (Minutes)
State Resource Management Area	32	Pahala	0.50	0.0	0.0
State Resource Management Area	34	Volcano Golf Course Community	0.97	0.0	0.0
State Resource Management Area	38	Jaggar/HVO	0.62	0.0	0.0



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 Hawai'i Volcanoes National Park

Dawn N. S. Chang Department of Land and Natural Resources 1151 Punchbowl St. Honolulu, HI 96813

Dear Dawn Chang:

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 Hawai'i Volcanoes National Park (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 Keahou Cooperative Nēnē Sanctuary, 'Ola'a Forest Reserve, Ka'ū Forest Reserve, Kapāpala Forest Reserve, Mauna Loa Forest Reserve (and game management area), Kapāpala Cooperative Game Management Area , Kahauale'a Natural Area Reserve, Kipāhoehoe Natural Area Reserve, Manukā Natural Area Reserve, Pu'u Maka'ala Natural Area Reserve, Kipuka 'Ainahou Nēnē Sanctuary, Kīlauea State Recreation Area, Pāpā/Honomalino Conservation Easements (Nature Conservancy of Hawai'i Kona Hema Preserve), Keaoi Islet Seabird Sanctuary, and the State Resource Management Area (SRMA), 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 Hawai'i Volcanoes National Park, 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 26,664 air tours per year. The ATMP would 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 11,376 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 would 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: the No Action Alternative, representing a continuation of what is currently flown (11,376 flights); Alternative 2, which would not authorize air tours in the ATMP planning area;<sup>1</sup> and Alternative 3, which is identified as the Preferred Alternative, an 86% reduction in number of flights from the existing conditions and further described below. The FAA considered the potential for constructive use of Section 4(f) resources under all alternatives but focused the Section 4(f) analysis on the Preferred Alternative (Alternative 3). 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 Park resources including those that unreasonably interfere with ceremonies conducted by Native Hawaiian practitioners at cultural sites, Park programs, activities, the atmosphere of peace and tranquility, and the natural soundscapes in the Park's Wilderness areas. 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. Effects to Section 4(f) resources under Alternative 2 would be expected to be similar or less than those under Alternative 3 as there would be no air tours authorized in the ATMP planning area under this alternative. Therefore, the Section 4(f) analysis does not analyze the potential for constructive use of Section 4(f) resources in detail under Alternative 2. Detailed analysis of Section 4(f) resources is provided for Alternative 3 (Preferred Alternative).

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

- A maximum of 1,565 commercial air tours<sup>2</sup> are authorized per year on the route depicted in **Attachment A**;
- The designated altitudes in **Attachment A** require minimum altitudes of 1,500 ft. AGL over land and 2,000 ft. AGL over the ocean.
- The aircraft types authorized for the commercial air tours includes: CE-337-T337H, CE-421-C, AS-350-B2, EC-130-B4, EC-130-T2, BHT-407-407, BHT-430-430, MD-369-D, MD-369-E, C208B, and AS-350-BA. Any new or replacement aircraft must not exceed the noise level produced by the aircraft being replaced;
- Air tours may operate between 10:00 AM and 2:00 PM local time, except as provided by the quiet technology incentive, on all days of the week except Wednesday and Sunday and designated no-fly days;
- Hovering, loitering, and/or circling for up to five minutes is permitted on the Pu'u'ō'ō Route and in the Pu'u'ō'ō Quiet Technology Zone. Circling aircraft would have to turn away from the

<sup>&</sup>lt;sup>1</sup> 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.

<sup>&</sup>lt;sup>2</sup> The number of commercial tours authorized under the ATMP is 14% of the 2017-2019 reporting average.

advancing blade as much as possible to minimize noise. Hovering, loitering and/or circling is prohibited on the Kahuku Route and the Coastal Route.

- Operators are required to equip all aircraft used for air tours with flight monitoring technology, to use flight monitoring technology during all air tours under the ATMP, and to report flight monitoring data as an attachment to the operator's semi-annual reports, along with the number of commercial air tours conducted;
- When made available by Park staff, operators/pilots are required to attend an annual interpretive training when made available by the NPS. The training will include Park information that operators can use to further their own understanding of Park priorities and management objectives as well as enhance the interpretive narrative for air tour clients and increase understanding of Parks by air tour clients;
- Helicopter operators are required to complete the FAA Introduction to Fly Neighborly training, in addition to the above NPS interpretive training;
- At the request of either of the agencies, the Park staff, the FAA Flight Standards District Office (FSDO), and the operators will meet once per year to discuss the implementation of the ATMP and any amendments or other changes to the ATMP; and
- For situational awareness when conducting tours of the Park, the operators will utilize frequency 122.85 and report when they enter the ATMP boundary to begin the route and upon completion of the route. The pilots will identify their company, aircraft, and route to make any other aircraft in the vicinity aware of their position.

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

# Section 4(f)

The Section 4(f) study area for considering Section 4(f) resources for the ATMP consists of the commercial air tour route within the Park and ½-mile outside the boundary of the Park (ATMP planning area) and extends to correspond 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 Section 4(f) study area) was included in the Section 4(f) analysis.

# 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 (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 <sub>Aeq, 12 hr</sub>	The logarithmic average of commercial air tour sound levels, in dBA, 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 <sub>dn</sub> (or DNL)	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.				
	Note: Both L <sub>Aeq, 12hr</sub> and DNL characterize:				
	<ul> <li>Increases in both the loudness and duration of noise events</li> <li>The number of noise events during specific time period (12 hours for L<sub>Aeq</sub>, 12hr and 24-hours for DNL)</li> </ul>				
	If there are no nighttime events, then $L_{Aeq, 12hr}$ is arithmetically three dBA higher than DNL as the events are averaged over 24 hours instead of 12 hours.				
	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 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	The total time (minutes) that aircraft noise levels are audible to an attentive listener with normal hearing under natural ambient conditions.				
Ambient	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.				
Time Above 35 dBA	The amount of time (in minutes) that aircraft sound levels are above a given threshold (i.e., 35 dBA).				
	In quiet settings, outdoor sound levels exceeding this level degrade experience in outdoor performance venues (American National Standards Institute (ANSI), 2007); blood pressure increases in sleeping humans (Haralabidis et al., 2008); maximum				

Metric	Relevance and citation
	background noise level inside classrooms (ANSI/Acoustical Society of America S12.60/Part 1-2010).
Time Above 52 dBA	The amount of time (in minutes) that aircraft sound levels are above a given threshold (i.e., 52 dBA).
	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). This metric represents the level at which one may reasonably expect interference with Park interpretive programs, activities that require communication from a distance and other general visitor communication.
Maximum sound level, L <sub>max</sub>	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.

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 the Preferred Alternative operations over the Park occur at low annual operational levels and are highly seasonal in nature, the FAA based the noise analysis on the number of aircraft operations for each aircraft and route proposed under the Preferred Alternative. This approach provides a conservative evaluation of potential noise impacts to Park resources, as well as Section 4(f) resources, under the Preferred Alternative.

The Preferred Alternative would authorize three flight routes with minimum altitude requirements of 1,500 – 2,000 ft. AGL. Air tour routes within the ATMP planning area are represented by a line with a ¼-mile buffer on either side of the route that indicates the acceptable range of deviation that would not trigger enforcement action. For the Park, the peak month average day (PMAD) under existing conditions, as derived from operator reporting, is 48.5 flights. For noise modeling, the number of air tours using these aircraft types and routes are representative of an 86% reduction in PMAD activity under existing conditions:

- Aerospatiale AS-350D, 1 flight on route shown in Attachment A
- Eurocopter EC-130, 3 flights on route shown in Attachment A
- Cessna 208, 1 flight on route shown in Attachment A

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 46 location points, geographically located across the entire Park, where noise levels were to be

evaluated (see **Attachment B** for a map of location points in relation to Section 4(f) resources). 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.

The noise analysis indicates that the Preferred Alternative would not result in any noise impacts that would be "reportable" under FAA's policy for the NEPA.<sup>3</sup> Under the Preferred Alternative, commercial air tours are restricted to designated routes and minimum altitudes of 1,500 ft. AGL over land and 2,000 ft. AGL over the ocean. The number of flights authorized in the Preferred Alternative is a substantial reduction from the three-year average for 2017-2019. The resultant DNL due to the Preferred Alternative is expected to be below DNL 45 dB and would eliminate or reduce noise in many noise sensitive regions of the ATMP planning area compared to current conditions.

As indicated by the supplemental noise metrics, some points overlapping with or near Section 4(f) resources may experience an increase in noise intensity or duration as compared to existing conditions as routes include flights near these resources under the Preferred Alternative. For parks and recreational sites that are Section 4(f) properties, at some points that are closest to the authorized routes under the Preferred Alternative (Points 9, 10, 14, 17, 18, 20, 24, 31, 39, 40, 41,) Time Above 35 dBA or 52 dBA may be higher for quiet technology-only days compared to standard days because some quiet technology aircraft, while quieter overall, may be audible for a slightly longer period of time than standard aircraft based on the specific route location and type of aircraft modeled. Of the Section 4(f) park and recreational sites that are within the Section 4(f) study area, this would be most likely to affect Kahauale'a Natural Area Reserve, Keaoi Islet Seabird Sanctuary, and State Resource Management Area which are located closest to these modeled location points and the routes for the Preferred Alternative.

Based on the noise analysis, nine location points (14, 17, 18, 19, 20, 24, 39, 40, 41) are anticipated to experience increases in noise under both standard and quiet technology-only days as indicated by the supplemental metrics (time audible natural ambient, time above 35 dBA, time above 52 dBA, maximum sound level) as compared to current conditions. The FAA identified whether these points were near any parks and recreational Section 4(f) properties (refer **Attachment B** for the Section 4(f) location point analysis):

- Point 24 is within 1.10 miles of the Ka'ū Forest Reserve and within 0.77 miles of the State Resource Management Area;
- Point 39 is within 0.27 miles of the Keaoi Islet Seabird Sanctuary;
- Point 40 is within 1.47 miles of the Keaoi Islet Seabird Sanctuary.

The FAA then evaluated the supplemental noise metrics to determine changes in noise duration and intensity that would be experienced at those Section 4(f) properties under the Preferred Alternative compared to existing conditions. Points 24 and 40 would experience increases in noise duration under all conditions but increases in noise intensity (as indicated by maximum sound level) would only occur

<sup>&</sup>lt;sup>3</sup> Per FAA Order 1050.1F, the FAA refers to noise changes meeting the following criteria as "reportable": for DNL 65 dB and higher, ± DNL 1.5 dB; for DNL 60 dB to <65 dB, ± DNL 3 dB; for DNL 45 dB to <60 dB, ± DNL 5 dB. See 1050.1F Desk Reference, Section 11.3.

on standard days on which air tours would be permitted. Increases in noise intensity either do not occur or are minimal (< 3 dBA) on quiet technology-only days. The increases in time above metrics are minimal (at Point 24, time above 35 dBA would increase from 1.8 to 10.9 minutes; time above 52 dBA would increase from less than 0.1 minutes to 0.7 minutes; at Point 40, time above 35 dBA would increase from 2.2 to 7.7 minutes; time above 52 dBA would increase from 0.2 to 0.8 minutes). The time audible for natural ambient would increase at these points but less on quiet technology-only days (at Point 24, increase from 10.2 minutes to 46.6 minutes on a standard day and 37.7 minutes on a quiet technology-only day; at Point 40, increase from 0 minutes to 88.6 minutes on a standard day and 51.5 minutes on a quiet technology-only day). Note that in all cases, these durations are the summation of several non-contiguous events that would span across the operating day.

Point 39 represents a coastal point near the Keaoi Islet Seabird Sanctuary, and noise at Point 39 would increase for all modeled noise metrics. Specifically, the maximum sound level would increase by 2 dBA on quiet technology days and almost 8 dBA on standard days, with the highest level at 60.7 dBA. Time above 35 dBA and 52 dBA would slightly increase under the Preferred Alternative based on the modeling results, with time above 35 dBA experienced for a total of 7 minutes on a standard day and 10 minutes on a quiet technology-only day, and time above 52 dBA experienced for 1 minute on both a standard day and on a quiet technology-only day. At Point 39, air tours would be audible for 36 minutes on quiet technology-only days and about an hour (61 minutes) on standard days.

Because noise is modeled using conservative assumptions and implementing the ATMP under the Preferred Alternative would result in limiting the number of flights to 14% of the three-year average of flights flown from 2017-2019 using three consolidated routes and the same aircraft to fly at higher altitudes than existing conditions, noise impacts to Section 4(f) parks and recreational resources are expected to experience an overall reduction under the Preferred Alternative. Air tours are currently occurring in these areas, and the Preferred Alternative would substantially reduce the number of air tours within the ATMP planning area, move the air tours away from most Section 4(f) resources in the Section 4(f) study area, and increase the altitude at which air tours must fly. Although the Preferred Alternative would shift authorized air tour operations to the three proposed flight paths and may expose some Section 4(f) resources to increased noise impacts, any increases in noise impacts would not result in substantial impairment of these Section 4(f) resources. The inclusion of no-fly days, time-of-day restrictions to avoid sunrise and sunset, quiet technology incentives, and limiting flights to certain days of the week minimizes impacts to Section 4(f) resources. Furthermore, air tours are transitory in nature, and any noise impacts would be temporary, infrequent, and in many cases less intrusive than existing conditions in the Section 4(f) study area.

The FAA also considered the potential for vibrational impacts on Section 4(f) resources under the Preferred Alternative. 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, 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 the Preferred Alternative would be well below recommended limits. <sup>4, 5</sup> 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.

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 and vibrational effects by the implementation of Preferred Alternative. The Preferred Alternative would not result in significant or reportable increase in noise at the Park. Likewise, vibrational impacts from air tour overflights would be minimal. These findings support the FAA's determination that implementation of the Proposed Action would not constitute a constructive use of Section 4(f) resources in the Section 4(f) study 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 Section 4(f) study area. The Preferred Alternative limits the number of commercial air tours to 1,565 flights per year (an 86% reduction compared to the No Action Alternative) and would limit those flights to three designated flight paths. These restrictions which would result in fewer areas of the Section 4(f) study area, and therefore, fewer Section 4(f) properties, from which a commercial air tour could be visible. The Preferred Alternative 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 of Section 4(f) resources.

# **Preliminary Finding**

The FAA has preliminarily determined the Preferred Alternative would not substantially diminish or impair the protected activities, features, or attributes of the Section 4(f) resources in the Section 4(f) study area; therefore, based on the analysis above, FAA intends to make a determination of no constructive use of Keahou Cooperative Nēnē Sanctuary, 'Ola'a Forest Reserve, Ka'ū Forest Reserve, Kapāpala Forest Reserve, Mauna Loa Forest Reserve (and game management area), Kapāpala Cooperative Game Management Area , Kahauale'a Natural Area Reserve, Kipāhoehoe Natural Area Reserve, Manukā Natural Area Reserve, Pu'u Maka'ala Natural Area Reserve, Kipuka 'Ainahou Nēnē Sanctuary, Kīlauea State Recreation Area, Pāpā/Honomalino Conservation Easements (Nature Conservancy of Hawai'i Kona Hema Preserve), Keaoi Islet Seabird Sanctuary, and the State Resource Management Area (SRMA). 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.

<sup>&</sup>lt;sup>4</sup> Hanson, C.E., King, K.W., et al., "Aircraft Noise Effects on Cultural Resources: Review of Technical Literature," NPOA Report No. 91-3 (HMMH Report No.290940.04-1), September 1991.

<sup>&</sup>lt;sup>5</sup> 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.

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

Sincerely,

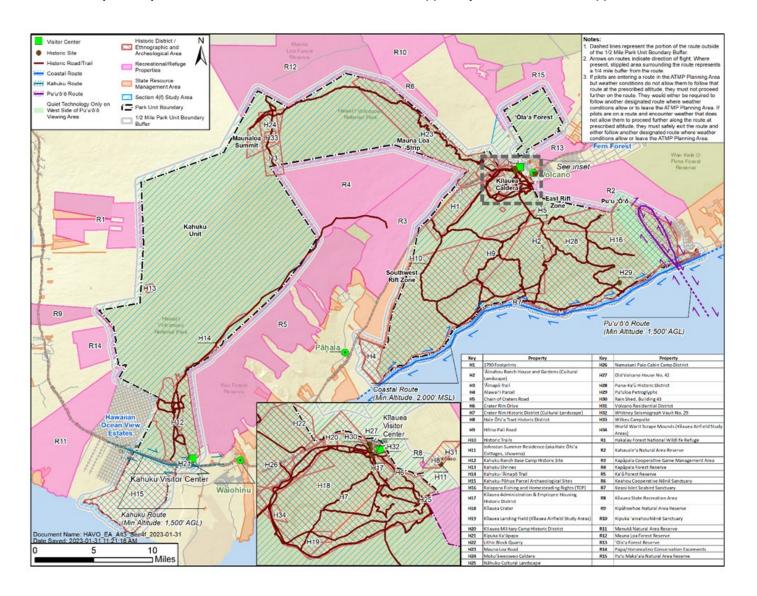
Eric Elmore Senior Policy Advisor Office of Environment and Energy Federal Aviation Administration

Attachments

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

#### ATTACHMENT A

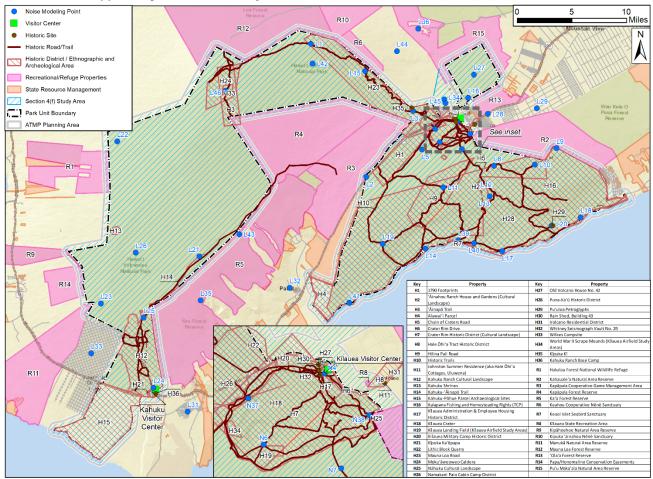
#### Map of Proposed Commercial Air Tour Routes, Section 4(f) study area, and Section 4(f) Resources



# ATTACHMENT B

# Section 4(f) Location Point Analysis

To assess time above 52 dBA at Section 4(f) resources under the Preferred Alternative, 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 1shows the low and high modelled time above 52 dB values under the Preferred Alternative at each Section 4(f) resource. Table 2shows the distance between each Section 4(f) resource and nearby location point and the time above 52 dB at the corresponding location point. A distance of 0.0 miles indicates that the location point falls within the Section 4(f) property. The longest time above 52 dB in the Section 4(f) study area is 5.8 minutes on standard days and 9.7 minutes on quiet technology (QT)-only days.



Section 4(f) Study Area and Properties for ATMP at Hawai'i Volcanoes National Park

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

Section 4(f) Resource	Time Above 52 dBA – Low, Standard Day (minutes)	Time Above 52 dBA – High, Standard Day (minutes)	Time Above 52 dBA – Low, QT Day (minutes)	Time Above 52 dBA – High, QT Day (minutes)
1790 Footprints	0.0	0.0	0.0	0.0
'Āinapō Trail	0.0	0.0	0.0	0.0
'Āinahou Ranch House and Gardens (Cultural Landscape)	0.0	0.0	0.0	0.0
Chain of Craters Road	0.0	1.5	0.0	1.4
Crater Rim Drive	0.0	0.0	0.0	0.0
Crater Rim Historic District (Cultural Landscape)	0.0	0.0	0.0	0.0
Hakalau Forest National Wildlife Refuge	0.0	0.0	0.0	0.0
Hale Ōhi'a Tract Historic District	0.0	0.0	0.0	0.0
Hilina Pali Road	0.0	0.0	0.0	0.0
Historic Trails	0.0	2.1	0.0	2.5
Johnston Summer Residence (aka Hale Ōhi'a Cottages, Uluwena)	0.0	0.0	0.0	0.0
Kahauale'a Natural Area Reserve	0.0	5.8	0.0	9.7
Kahuku Ranch Cultural Landscape	0.0	0.7	0.0	0.0
Kahuku-Pōhue Parcel Archaeological Sites	0.0	0.7	0.0	0.0
Kahuku-'Āinapō Trail	0.0	0.7	0.0	0.0
Kalapana Fishing and Homesteading Rights (TCP)	0.0	5.8	0.0	9.7
Kapāpala Cooperative Game Management Area	0.0	0.0	0.0	0.0
Ka'ū Forest Reserve	0.0	0.7	0.0	0.0
Keahou Cooperative Nēnē Sanctuary	0.0	0.0	0.0	0.0
Keaoi Islet Seabird Sanctuary	0.8	1.2	0.4	1.2
, Kilauea Military Camp Historic District	0.0	0.0	0.0	0.0
Kīlauea Administration & Employee Housing Historic District	0.0	0.0	0.0	0.0
Kīlauea Crater	0.0	0.0	0.0	0.0

Table 1. Low and high modelled values for Time Above 52 dB under the Preferred Alternative for Section 4(f) resources. Noise modeling results are shown for a standard day and quiet technology-only day.

Section 4(f) Resource	Time Above 52 dBA – Low, Standard Day (minutes)	Time Above 52 dBA – High, Standard Day (minutes)	Time Above 52 dBA – Low, QT Day (minutes)	Time Above 52 dBA – High, QT Day (minutes)
Kīlauea Landing Field (Kīlauea Airfield Study Areas)	0.0	0.0	0.0	0.0
Kīlauea State Recreation Area	0.0	0.0	0.0	0.0
Kīpuka Ka'ōpapa	0.0	0.7	0.0	0.0
Lithic Block Quarry	0.0	0.0	0.0	0.0
Manukā Natural Area Reserve	0.0	0.0	0.0	0.0
Mauna Loa Forest Reserve	0.0	0.0	0.0	0.0
Mauna Loa Road	0.0	0.0	0.0	0.0
Moku'āweoweo Caldera	0.0	0.0	0.0	0.0
Namakani Paio Cabin Camp District	0.0	0.0	0.0	0.0
Nāhuku (Thurston Lava Tube) Cultural Landscape	0.0	0.0	0.0	0.0
'Ola'a Forest Reserve	0.0	0.0	0.0	0.0
Old Volcano House No. 42	0.0	0.0	0.0	0.0
Puna-Ka'ū Historic District	0.0	5.8	0.0	9.7
Pu'uloa Petroglpyhs	0.0	0.0	0.0	0.0
Pu'u Maka'ala Natural Area Reserve	0.0	0.0	0.0	0.0
Rain Shed, Building 43	0.0	0.0	0.0	0.0
State Resource Management Area (SRMA)	0.0	0.7	0.0	0.0
Volcano Residential District	0.0	0.0	0.0	0.0
Whitney Seismograph Vault No. 29	0.0	0.0	0.0	0.0
Wilkes Campsite	0.0	0.0	0.0	0.0
World War II Scrape Mounds (Kīlauea Airfield Study Areas)	0.0	0.0	0.0	0.0

Section 4(f) Resource	Location Point ID	Location Point Name	Distance to Location Point (Miles)	Time Above 52 dBA, Standard Day (Minutes)	Time Above 52 dBA, QT Day (Minutes)
1790 Footprints	2	Vicinity of Halfway House	0.71	0.0	0.0
1790 Footprints	3	Kipuka Puaulu	1.12	0.0	0.0
1790 Footprints	5	Cone Peak, Nene Area	0.45	0.0	0.0
1790 Footprints	6	Halemaumau Crater	1.25	0.0	0.0
1790 Footprints	37	Nahuku (Thurston Lava Tube)	0.90	0.0	0.0
Chain of Craters Road	7	Puhimau Hot Spot	0.02	0.0	0.0
Chain of Craters Road	8	Puʻ u Huluhulu View Pt.	1.18	0.0	0.0
Chain of Craters Road	12	Ainahou Ranch	0.76	0.0	0.0
Chain of Craters Road	13	Kipuka Kahalii	0.52	0.0	0.0
Chain of Craters Road	18	End of Road / Visitor Use	1.19	1.5	1.4
Chain of Craters Road	20	Puʻu Loa Petroglpyhs	0.48	0.0	0.0
Chain of Craters Road	38	Jaggar/HVO	1.09	0.0	0.0
Crater Rim Drive	4	Park HQ Developed Area	0.03	0.0	0.0
Crater Rim Drive	5	Cone Peak, Nene Area	1.03	0.0	0.0
Crater Rim Drive	6	Halemaumau Crater	0.04	0.0	0.0
Crater Rim Drive	7	Puhimau Hot Spot	0.86	0.0	0.0
Crater Rim Drive	37	Nahuku (Thurston Lava Tube)	0.12	0.0	0.0
Crater Rim Drive	38	Jaggar/HVO	0.0	0.0	0.0
Crater Rim Historic District (Cultural Landscape)	4	Park HQ Developed Area	0.0	0.0	0.0

Table 2. Section 4(f) resources and corresponding location point data for air tours under the Preferred Alternative. Noise modeling results are shown for a standard day and quiet technology (QT)-only day.

Section 4(f) Resource	Location Point ID	Location Point Name	Distance to Location Point (Miles)	Time Above 52 dBA, Standard Day (Minutes)	Time Above 52 dBA, QT Day (Minutes)
Crater Rim Historic District (Cultural Landscape)	5	Cone Peak, Nene Area	0.97	0.0	0.0
Crater Rim Historic District (Cultural Landscape)	6	Halemaumau Crater	0.0	0.0	0.0
Crater Rim Historic District (Cultural Landscape)	7	Puhimau Hot Spot	0.65	0.0	0.0
Crater Rim Historic District (Cultural Landscape)	37	Nahuku (Thurston Lava Tube)	0.0	0.0	0.0
Crater Rim Historic District (Cultural Landscape)	38	Jaggar/HVO	0.0	0.0	0.0
Crater Rim Historic District (Cultural Landscape)	45	Keauhou Bird Conservation Center	1.21	0.0	0.0
Hakalau Forest National Wildlife Refuge	22	Northwest Kahuku	1.18	0.0	0.0
Hale Ōhi'a Tract Historic District	4	Park HQ Developed Area	1.43	0.0	0.0
Hale Ōhi'a Tract Historic District	38	Jaggar/HVO	0.95	0.0	0.0
Hilina Pali Road	7	Puhimau Hot Spot	1.07	0.0	0.0
Hilina Pali Road	11	Kulanaokuaiki Camp	0.0	0.0	0.0
Historic Trails	1	Red Hill	0.0	0.0	0.0
Historic Trails	2	Vicinity of Halfway House	1.24	0.0	0.0
Historic Trails	3	Kipuka Puaulu	0.95	0.0	0.0
Historic Trails	4	Park HQ Developed Area	0.08	0.0	0.0
Historic Trails	5	Cone Peak, Nene Area	0.35	0.0	0.0
Historic Trails	6	Halemaumau Crater	0.01	0.0	0.0
Historic Trails	7	Puhimau Hot Spot	0.64	0.0	0.0

Section 4(f) Resource	Location Point ID	Location Point Name	Distance to Location Point (Miles)	Time Above 52 dBA, Standard Day (Minutes)	Time Above 52 dBA, QT Day (Minutes)
Historic Trails	8	Puʻ u Huluhulu View Pt.	0.03	0.0	0.0
Historic Trails	10	Napau Wilderness Camp	0.0	0.0	0.0
Historic Trails	11	Kulanaokuaiki Camp	0.04	0.0	0.0
Historic Trails	13	Kipuka Kahalii	0.36	0.0	0.0
Historic Trails	14	Kaaha Wilderness Camp	0.27	1.4	1.6
Historic Trails	15	Top of Strip Road	0.16	0.0	0.0
Historic Trails	17	Apua Pt. Camp	0.11	2.1	2.5
Historic Trails	19	Kipuka Pepeiao Wilderness Camp	0.03	0.0	0.0
Historic Trails	20	Puʻu Loa Petroglpyhs	0.01	0.0	0.0
Historic Trails	24	Upper Reservoir Kahuku	1.17	0.7	0.0
Historic Trails	25	Frontcountry Kahuku	1.23	0.0	0.0
Historic Trails	37	Nahuku (Thurston Lava Tube)	0.06	0.0	0.0
Historic Trails	38	Jaggar/HVO	0.0	0.0	0.0
Historic Trails	39	Halape Wilderness Camp	0.0	1.2	1.2
Historic Trails	40	Keauhou Camp	0.02	0.8	0.4
Historic Trails	46	Mauna Loa Wilderness Camp	0.02	0.0	0.0
Johnston Summer Residence (aka Hale Ōhi'a Cottages, Uluwena)	38	Jaggar/HVO	0.94	0.0	0.0
Kahauale'a Natural Area Reserve	7	Puhimau Hot Spot	1.33	0.0	0.0

Section 4(f) Resource	Location Point ID	Location Point Name	Distance to Location Point (Miles)	Time Above 52 dBA, Standard Day (Minutes)	Time Above 52 dBA, QT Day (Minutes)
Kahauale'a Natural Area Reserve	8	Pu' u Huluhulu View Pt.	1.45	0.0	0.0
Kahauale'a Natural Area Reserve	9	Pu' u Oo	0.05	5.8	9.7
Kahauale'a Natural Area Reserve	10	Napau Wilderness Camp	0.60	0.0	0.0
Kahauale'a Natural Area Reserve	28	Volcano Village	1.26	0.0	0.0
Kahauale'a Natural Area Reserve	29	Fern Forest	0.60	0.0	0.0
Kahauale'a Natural Area Reserve	38	Jaggar/HVO	0.05	0.0	0.0
Kahuku Ranch Cultural Landscape	21	Nene Cabin Kahuku	0.03	0.0	0.0
Kahuku Ranch Cultural Landscape	24	Upper Reservoir Kahuku	0.0	0.7	0.0
Kahuku Ranch Cultural Landscape	25	Frontcountry Kahuku	0.0	0.0	0.0
Kahuku-Pōhue Parcel Archaeological Sites	24	Upper Reservoir Kahuku	1.29	0.7	0.0
Kahuku-'Āinapō Trail	21	Nene Cabin Kahuku	0.25	0.0	0.0
Kahuku-'Āinapō Trail	24	Upper Reservoir Kahuku	1.40	0.7	0.0
Kahuku-'Āinapō Trail	25	Frontcountry Kahuku	0.01	0.0	0.0
Kahuku-'Āinapō Trail	43	Endangered Forest Bird Habitat 1	0.47	0.0	0.0
Kalapana Fishing and Homesteading Rights (TCP)	8	Pu' u Huluhulu View Pt.	1.01	0.0	0.0
Kalapana Fishing and Homesteading Rights (TCP)	9	Pu' u Oo	0.0	5.8	9.7
Kalapana Fishing and Homesteading Rights (TCP)	10	Napau Wilderness Camp	0.96	0.0	0.0

Section 4(f) Resource	Location Point ID	Location Point Name	Distance to Location Point (Miles)	Time Above 52 dBA, Standard Day (Minutes)	Time Above 52 dBA, QT Day (Minutes)
Kalapana Fishing and Homesteading Rights (TCP)	12	Ainahou Ranch	0.77	0.0	0.0
Kalapana Fishing and Homesteading Rights (TCP)	13	Kipuka Kahalii	0.0	0.0	0.0
Kalapana Fishing and Homesteading Rights (TCP)	17	Apua Pt. Camp	0.0	2.1	2.5
Kalapana Fishing and Homesteading Rights (TCP)	18	End of Road / Visitor Use	0.0	1.5	1.4
Kalapana Fishing and Homesteading Rights (TCP)	20	Puʻu Loa Petroglpyhs	0.0	0.0	0.0
Kalapana Fishing and Homesteading Rights (TCP)	39	Halape Wilderness Camp	0.0	1.2	1.2
Kalapana Fishing and Homesteading Rights (TCP)	40	Keauhou Camp	0.0	0.8	0.4
Kapāpala Cooperative Game Management Area	2	Vicinity of Halfway House	0.04	0.0	0.0
Kapāpala Cooperative Game Management Area	3	Kipuka Puaulu	0.89	0.0	0.0
Ka'ū Forest Reserve	21	Nene Cabin Kahuku	0.71	0.0	0.0
Ka'ū Forest Reserve	24	Upper Reservoir Kahuku	1.10	0.7	0.0
Ka'ū Forest Reserve	25	Frontcountry Kahuku	0.74	0.0	0.0
Ka'ū Forest Reserve	35	Kau Forest Reserve	0.0	0.0	0.0
Ka'ū Forest Reserve	43	Endangered Forest Bird Habitat 1	0.0	0.0	0.0
Keahou Cooperative Nēnē Sanctuary	15	Top of Strip Road	0.44	0.0	0.0

Section 4(f) Resource	Location Point ID	Location Point Name	Distance to Location Point (Miles)	Time Above 52 dBA, Standard Day (Minutes)	Time Above 52 dBA, QT Day (Minutes)
Keaoi Islet Seabird Sanctuary	39	Halape Wilderness Camp	0.27	1.2	1.2
Keaoi Islet Seabird Sanctuary	40	Keauhou Camp	1.47	0.8	0.4
Kilauea Military Camp Historic District	4	Park HQ Developed Area	0.98	0.0	0.0
Kilauea Military Camp Historic District	37	Nahuku (Thurston Lava Tube)	1.12	0.0	0.0
Kilauea Military Camp Historic District	45	Keauhou Bird Conservation Center	1.19	0.0	0.0
Kīlauea Administration & Employee Housing Historic District	4	Park HQ Developed Area	0.0	0.0	0.0
Kīlauea Administration & Employee Housing Historic District	38	Jaggar/HVO	1.26	0.0	0.0
Kīlauea Crater	4	Park HQ Developed Area	0.0	0.0	0.0
Kīlauea Crater	5	Cone Peak, Nene Area	1.10	0.0	0.0
Kīlauea Crater	6	Halemaumau Crater	0.0	0.0	0.0
Kīlauea Crater	7	Puhimau Hot Spot	1.44	0.0	0.0
Kīlauea Crater	34	Volcano Golf Course Community	1.04	0.0	0.0
Kīlauea Crater	37	Nahuku (Thurston Lava Tube)	0.0	0.0	0.0
Kīlauea Crater	38	Jaggar/HVO	0.94	0.0	0.0
Kīlauea Crater	45	Keauhou Bird Conservation Center	0.68	0.0	0.0
Kīlauea Landing Field (Kīlauea	6	Halemaumau Crater	0.03	0.0	0.0

Section 4(f) Resource	Location Point ID	Location Point Name	Distance to Location Point (Miles)	Time Above 52 dBA, Standard Day (Minutes)	Time Above 52 dBA, QT Day (Minutes)
Airfield Study Areas)					
Kīlauea Landing Field (Kīlauea Airfield Study Areas)	37	Nahuku (Thurston Lava Tube)	1.30	0.0	0.0
Kīlauea State Recreation Area	4	Park HQ Developed Area	1.09	0.0	0.0
Kīlauea State Recreation Area	38	Jaggar/HVO	0.77	0.0	0.0
Kīpuka Ka'ōpapa	24	Upper Reservoir Kahuku	0.56	0.7	0.0
Lithic Block Quarry	3	Kipuka Puaulu	1.07	0.0	0.0
Lithic Block Quarry	4	Park HQ Developed Area	1.26	0.0	0.0
Lithic Block Quarry	6	Halemaumau Crater	1.20	0.0	0.0
Lithic Block Quarry	34	Volcano Golf Course Community	1.11	0.0	0.0
Lithic Block Quarry	37	Nahuku (Thurston Lava Tube)	0.0	0.0	0.0
Lithic Block Quarry	45	Keauhou Bird Conservation Center	0.92	0.0	0.0
Manukā Natural Area Reserve	23	Pu'u Ohohia	0.65	0.0	0.0
Manukā Natural Area Reserve	33	Ocean View Community	1.45	0.0	0.0
Mauna Loa Forest Reserve	1	Red Hill	0.89	0.0	0.0
Mauna Loa Road	1	Red Hill	0.0	0.0	0.0
Mauna Loa Road	3	Kipuka Puaulu	0.0	0.0	0.0
Mauna Loa Road	4	Park HQ Developed Area	1.07	0.0	0.0
Mauna Loa Road	5	Cone Peak, Nene Area	1.44	0.0	0.0
Mauna Loa Road	6	Halemaumau Crater	1.32	0.0	0.0

Section 4(f) Resource	Location Point ID	Location Point Name	Distance to Location Point (Miles)	Time Above 52 dBA, Standard Day (Minutes)	Time Above 52 dBA, QT Day (Minutes)
Mauna Loa Road	15	Top of Strip Road	0.0	0.0	0.0
Mauna Loa Road	37	Nahuku (Thurston Lava Tube)	0.03	0.0	0.0
Mauna Loa Road	42	Petrel Breeding Area	1.05	0.0	0.0
Mauna Loa Road	45	Keauhou Bird Conservation Center	1.35	0.0	0.0
Moku'āweoweo Caldera	46	Mauna Loa Wilderness Camp	0.0	0.0	0.0
Namakani Paio Cabin Camp District	37	Nahuku (Thurston Lava Tube)	0.61	0.0	0.0
Nāhuku (Thurston Lava Tube) Cultural Landscape	38	Jaggar/HVO	0.0	0.0	0.0
Old Volcano House No. 42	4	Park HQ Developed Area	0.17	0.0	0.0
Puna-Ka'ū Historic District	8	Puʻ u Huluhulu View Pt.	0.0	0.0	0.0
Puna-Ka'ū Historic District	9	Pu' u Oo	0.0	5.8	9.7
Puna-Ka'ū Historic District	10	Napau Wilderness Camp	0.0	0.0	0.0
Puna-Ka'ū Historic District	11	Kulanaokuaiki Camp	0.0	0.0	0.0
Puna-Ka'ū Historic District	12	Ainahou Ranch	0.0	0.0	0.0
Puna-Ka'ū Historic District	13	Kipuka Kahalii	0.0	0.0	0.0
Puna-Ka'ū Historic District	14	Kaaha Wilderness Camp	0.0	1.4	1.6
Puna-Ka'ū Historic District	17	Apua Pt. Camp	0.0	2.1	2.5
Puna-Ka'ū Historic District	18	End of Road / Visitor Use	0.0	1.5	1.4
Puna-Ka'ū Historic District	19	Kipuka Pepeiao	0.0	0.0	0.0

Section 4(f) Resource	Location Point ID	Location Point Name	Distance to Location Point (Miles)	Time Above 52 dBA, Standard Day (Minutes)	Time Above 52 dBA, QT Day (Minutes)
		Wilderness Camp			
Puna-Ka'ū Historic District	20	Pu' u Loa Petroglpyhs	0.0	0.0	0.0
Puna-Ka'ū Historic District	39	Halape Wilderness Camp	0.0	1.2	1.2
Puna-Ka'ū Historic District	40	Keauhou Camp	0.0	0.8	0.4
Puna-Ka'ū Historic District	41	Great Crack Coastal Fishing Camp	0.0	2	2.3
Pu'uloa Petroglpyhs	20	Puʻu Loa Petroglpyhs	0.11	0.0	0.0
Pu'u Maka'ala Natural Area Reserve	34	Volcano Golf Course Community	1.45	0.0	0.0
Pu'u Maka'ala Natural Area Reserve	36	Olaa Kilauea Forest Partnership	0.0	0.0	0.0
Rain Shed, Building 43	4	Park HQ Developed Area	0.29	0.0	0.0
Volcano Residential District	4	Park HQ Developed Area	1.19	0.0	0.0
Volcano Residential District	28	Volcano Village	0.82	0.0	0.0
Volcano Residential District	38	Jaggar/HVO	0.75	0.0	0.0
Whitney Seismograph Vault No. 29	4	Park HQ Developed Area	0.11	0.0	0.0
Wilkes Campsite	46	Mauna Loa Wilderness Camp	0.0	0.0	0.0
World War II Scrape Mounds (Kīlauea Airfield Study Areas)	4	Park HQ Developed Area	1.40	0.0	0.0
World War II Scrape Mounds (Kīlauea Airfield Study Areas)	5	Cone Peak, Nene Area	1.16	0.0	0.0

Section 4(f) Resource	Location Point ID	Location Point Name	Distance to Location Point (Miles)	Time Above 52 dBA, Standard Day (Minutes)	Time Above 52 dBA, QT Day (Minutes)
World War II Scrape Mounds (Kīlauea Airfield Study Areas)	6	Halemaumau Crater	0.60	0.0	0.0
World War II Scrape Mounds (Kīlauea Airfield Study Areas)	37	Nahuku (Thurston Lava Tube)	0.53	0.0	0.0
'Ola'a Forest Reserve	16	Ola'a Transect 19	0.37	0.0	0.0
'Ola'a Forest Reserve	28	Volcano Village	0.03	0.0	0.0
'Ola'a Forest Reserve	29	Fern Forest	1.33	0.0	0.0
'Āinapō Trail	46	Mauna Loa Wilderness Camp	0.0	0.0	0.0
'Āinahou Ranch House and Gardens (Cultural Landscape)	12	'Ainahou Ranch	0.0	0.0	0.0
'Āinahou Ranch House and Gardens (Cultural Landscape)	13	Kipuka Kahalii	1.48	0.0	0.0
State Resource Management Area	2	Vicinity of Halfway House	0.32	0.0	0.0
State Resource Management Area	4	Park HQ Developed Area	1.00	0.0	0.0
State Resource Management Area	16	Ola'a Transect 19	1.20	0.0	0.0
State Resource Management Area	24	Upper Reservoir Kahuku	0.77	0.7	0.0
State Resource Management Area	28	Volcano Village	0.03	0.0	0.0
State Resource Management Area	29	Fern Forest	1.47	0.0	0.0
State Resource Management Area	30	Kalapana	1.12	0.0	0.0
State Resource Management Area	31	Discovery Harbor, Naalehu	0.79	0.0	0.0

Section 4(f) Resource	Location Point ID	Location Point Name	Distance to Location Point (Miles)	Time Above 52 dBA, Standard Day (Minutes)	Time Above 52 dBA, QT Day (Minutes)
State Resource Management Area	32	Pahala	0.50	0.0	0.0
State Resource Management Area	34	Volcano Golf Course Community	0.97	0.0	0.0
State Resource Management Area	38	Jaggar/HVO	0.62	0.0	0.0

JOSH GREEN, M.D. GOVERNOR | KE KIA'AINA

SYLVIA LUKE LIEUTENANT GOVERNOR J KA HOPE KIA'ÁINA



DAWN N.S. CHANG CHAIRPERSON BOARD OF LAND AND NATURAL RESOURCES COMMISSION ON WATER RESOURCE MANAGEMENT

> LAURA H.E. KAAKUA FIRST DEPUTY

M. KALEO MANUEL DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES BOATING AND OCEAN RECREATION BUREAU OF CONVEYANCES COMMISSION ON WATER RESOURCE MANAGEMENT CONSERVATION AND COASTAL LANDS CONSERVATION AND RESOURCES ENFORCEMENT ENGINEERING FORESTRY AND WILDLIFE HISTORIC PRESERVATION KAHOOLAWE ISLAND RESERVE COMMISSION LAND STATE PARKS



STATE OF HAWAI'I | KA MOKU'ĀINA 'O HAWAI'I DEPARTMENT OF LAND AND NATURAL RESOURCES KA 'OIHANA KUMUWAIWAI 'ĀINA

> DIVISION OF FORESTRY AND WILDLIFE 1151 PUNCHBOWL STREET, ROOM 325 HONOLULU, HAWAII 96813

> > August 30, 2023

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

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 Hawai'i Volcanoes National Park

Dear Mr. Eric Elmore:

The Department of Land and Natural Resources (Department) has received your request for comments on the FAA's preliminary proposed no substantial impairment findings for the Section 4 (f) resources under the Air Tour Management Plan (ATMP) for Hawai'i Volcanoes National Park (HVNP). The Federal Aviation Administration (FAA), in cooperation with the National Park Service (NPS) (collectively, the agencies), are developing an ATMP for the HVNP. 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)). 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. 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. 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 their analysis, FAA intends to make a determination of no constructive use of Keahou Cooperative Nēnē Sanctuary, 'Ola'a Forest Reserve, Ka'ū Forest Reserve, Kapāpala Forest Reserve, Mauna Loa Forest Reserve (and game management area), Kapapala Cooperative Game Management Area, Kahauale'a Natural Area Reserve, Kipāhoehoe Natural Area Reserve, Manukā Natural Area Reserve, Pu'u Maka'ala Natural Area Reserve, Kipuka 'Ainahou Nēnē Sanctuary, Kīlauea State Recreation Area, Papa/Honomalino and Kapua conservation easements (Nature Conservancy of Hawai'i Kona Hema Preserve), Keaoi Islet Seabird Sanctuary, and the State Resource Management Area (SRMA).

The Department concurs that the current level of air tour activity in the HVNP results in frequent and loud noise disruptions that adversely impact resource management activities, traditional and customary practices, activities of spiritual and cultural significance, recreational and wilderness user experience, and potentially harms numerous protected seabird species including the 'ua 'au or the Hawaiian Petrel (*Pterodroma sandwichensis*), 'a'o or Newell's Shearwater (*Puffinus newelli*), and 'akē'akē or Band-rumped Storm-Petrel (*Oceanodroma castro*); as well as critically endangered species of Hawaiian forest birds like the Akaiapōlā'au (*Hemignathus wilsoni*), Hawai'i ākepa (*Loxops coccineus coccineus*), 'alawī or Hawai'i Creeper (*Oreomystis* (*Loxops*) mana), and threatened 'i'iwi or the Scarlet Honeycreeper (*Drepanis coccinea*).

The Department commented on the proposed ATMP for Haleakalā National Park on March 28th, 2022, detailing that the commercial air tours impacts are widespread, affecting thousands of acres of public trust lands that serve to protect Hawai'i's unique biological and cultural treasures and to provide cultural and spiritual values for the public benefit. The Department strongly supports better management of air tours, urging the FAA to reduce and minimize flights over the National Park to the greatest extent, including supporting complete restrictions of air tours. The Department is in support of Alternative 2 in the HVNP ATMP and Draft Environmental Assessment (EA), in which commercial air tour aircraft would not fly within the ATMP planning area. As stated in the Draft EA, the elimination of commercial air tours from the ATMP planning area would result in direct beneficial impacts on the Park's air quality, noise and acoustic environment, biological resources, viewsheds, natural quality of Wilderness, as well as serve to preserve the opportunity to experience solitude in the wilderness. Furthermore, Alternative 2 would reduce the noise and visual intrusions from impacting the feeling and setting of cultural resources within the Area of Potential Effects (APE), including ethnographic resources and sacred sites, Native Hawaiian Traditional Cultural Properties (TCPs), archeological resources, cultural landscapes, historic districts, and prehistoric and historic buildings and structures, compared to current conditions.

We recognize that the FAA section 4 (f) ATMP analysis concluded, "Noise impacts to Section 4(f) parks and recreational resources are expected to experience an overall reduction under the Preferred Alternative. Air tours are currently occurring in these areas, and the Preferred Alternative would substantially reduce the number of air tours within the ATMP planning area, move the air tours away from most Section 4(f) resources in the Section 4(f) study area, and increase the altitude at which air tours must fly. Although the Preferred Alternative would shift authorized air tour operations to the three proposed flight paths and may expose some Section 4(f) resources to increased noise impacts, any increases in noise impacts would not result in substantial impairment of these Section 4(f) resources. The inclusion of no-fly days, time-of-day restrictions to avoid sunrise and sunset, quiet technology incentives, and limiting flights to certain days of the week minimizes impacts to Section 4(f) resources.

Furthermore, air tours are transitory in nature, and any noise impacts would be temporary, infrequent, and in many cases less intrusive than existing conditions in the Section 4(f) study area." This is supported in the FAA's data collection. "The noise analysis indicates that the Preferred Alternative would not result in any noise impacts that would be "reportable" under FAA's policy for the NEPA. The number of flights authorized with the Preferred Alternative is a substantial reduction from the three-year average for 2017-2019. The resultant DNL or Daynight average sound level due to the Preferred Alternative is expected to be below DNL 45 dB and would eliminate or reduce noise in many noise-sensitive regions of the ATMP planning

area compared to current conditions. Vibrational impacts from air tour overflights would be minimal." Furthermore, regarding visual impacts, "The Preferred Alternative limits the number of commercial air tours to 1,565 flights per year (an 86% reduction compared to the No Action Alternative) and would limit those flights to three designated flight paths. These restrictions which would result in fewer areas of the Section 4(f) study area, and therefore, fewer Section 4(f) properties, from which a commercial air tour could be visible. "

While we acknowledge and appreciate these findings, the Department still expresses concern that the ATMP for HVNP, while resulting in an overall reduction in overall impacts to 4(f) federal resources it could simultaneously result in more commercial air tour pressure and thus impacts on state resources and lands. The Department continues to echo our former requests to ask the FAA to better manage and restrict commercial flights on state lands and enact the same protections that the ATMP will grant to Federal Lands to the buffering adjacent state lands. Without extensions of similar protections to these contiguous state forest reserves and native ecosystems, which the same endangered and threatened species from the Park also exist on and utilize, there will be disconnect and disturbance to habitat connectivity and species protections. The same concerns that exist for the Park are valid on State lands in terms of commercial flights causing disturbance to mating, resting, communication, and foraging, all key survival behaviors for protected birds and other listed terrestrial and marine animals.

As stated in a previous letter written by the Department to the FAA regarding regulation of flight paths of commercial tour operators throughout the state of Hawai'i, dated May 28<sup>th</sup>, 2021; noise, low-flying helicopters, safety issues over neighborhoods, lack of compliance with flight tracking/following requirements, disruption of the public's enjoyment of the sanctity of the outdoors, and disturbance to endangered birds and other species in sensitive natural areas and critical habitat are significant concerns. This has especially been an issue during recent volcanic eruptions over the last 20 years and the resulting increased commercial air tours that coincide. This issue in air tour traffic has continued to increase in recent years and has reverberated as well in the state legislature, county councils, and many of the local neighborhood boards. If the FAA is unable to manage and regulate commercial air traffic in ways to minimize detrimental impacts to our native wildlife, ecosystems, and communities on and around state land, then the Department asks that you grant the Department the authority to manage and restrict air traffic on state lands in these efforts. We look forward to further collaboration with the FAA to minimize and mitigate the impacts of commercial air tours on stand lands and natural resources in Hawai'i.

Sincerely,

Dawn N.S. Chang Chairperson

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: 103522 Document: 118739
Name:	Belfield, Thomas
Received:	Feb,28 2022 13:41:06
Correspondence Type:	Web Form

Correspondence: I worked at the HAVO for over sixteen years as a botanist specializing in rare plants restoration and survey/monitoring of endangered plant species. I know the park well and remember this issue coming up before. I am opposed to overflights of the Kīlauea caldera. These flights are not necessary and are a detriment to visitor experiences. I do not believe the kupuna would approve of these flight either, or the any Hawaiian native for that matter. Kīlauea caldera is sacred and should be respected and treated as such. There is even a reasonably argument to be made that flights into the East Rift or along the coast should be banned or curtailed to protect wildlife and also visitor experience.

Thank you for your time and consideration to the comments.

Correspondence ID:	2	Project: 103522 Document:	118739	
Name:	Douglas, Bob			
Received:	Feb,28 2022 14:29:49			
Correspondence Type:	Web I	Form		

Correspondence: I support reducing the amount of tours as it infringes upon a sacred location to the native Hawaiians. The hours should be in consult with the native Hawaiian practitioners.

Additionally these tours impact native Hawaiian homes that these helicopters fly over. In particular Pana'ewa in Hilo. Many pilots take short cuts over the properties at low elevations. The noise is terrible but more dangerously are the pollutants from the exhaust and the chance of a crash. Any plan must include restricting non emergency flight paths over Pana'ewa.

Correspondence ID:	3	Project: 103522 Document:	118739	
Name:	Berghuis, Peter			
Received:	Feb,28 2022 15:24:43			
Correspondence Type:	Web	Form		

Correspondence: I currently live in Eden Roc Subdivision. My lot borders the Wao Kele O Puna Forest Reserve. I have noticed an increase in helicopter flights flying from the northwest to the southwest in recent years. At first the flights were not noisy. Currently they are noisier. They are also flying almost over my house instead of flying over the reserve on their way to the volcano. I understand commerce and business and for that reason I do not oppose the helecopter flights for the purposes of tourism.

However, the map shown on the alternative flight patterns show that helicopters are required to fly at 1500' above 80% of Eden Roc. Some current flights are flying right on the border of the forest reserve at less than 1500' because 500' altitude flights are permited over the reserve. Those flights are noisy.

My suggestion/comment is to require flights on these bearings to fly down the middle of the reserve that borders the subdivisions such as Eden Roc. With that requiremenet pilots could start at 1500' and descend to 500' while headed to the crater. Noise in the subdivisions would be reduced if the flights were 2-4 miles east (over the reserve) of the subdivisions as well.

Received:

Feb,28 2022 15:49:26

Correspondence Type:

Web Form

Correspondence: Aloha,

Please Please Please limit flights near/over populated areas including Mauna Loa Estates, Volcano Village and Volcano golf course. There are suitable routes that would allow for tourism and maintain the peace and quiet of our unique area. The noise of these flights are quite disturbing for the people and the wildlife. Mahalo

Correspondence ID:	5 Project: 103522 Document: 118739
Name:	Todd, Kazuo S
Received:	Feb,28 2022 16:25:42
Correspondence Type:	Web Form
Correspondence: NO COMMENTS.	
Correspondence ID:	6 Project: 103522 Document: 118739
Name:	Camarillo, James M
Received:	Feb,28 2022 17:00:02
Correspondence Type:	Web Form

Correspondence: Please stop all commercial air tours over Volcanoes National Park as they disturb the peace and quiet of being in the park. Air tourism has ruined the quiet solitude of parks like The Grand Canyon and others and should be stopped. Thank you for your consideration.

Correspondence ID:	7	Project: 103522 Document:	118739	
Name:	Boyea, Ralph C			
Received:	Feb,28	3 2022 17:24:31		
Correspondence Type:	Web F	form		

Correspondence: Our National Parks provide for some of the rarest places on earth - places where one can enjoy the sounds of nature.

Places where you can get away from the incessant sounds of motorized vehicles.

Ahhh, beautiful peace and quiet.

Then the sounds of one helicopter, then another and another to tune of 11,376 overflights in a year, over thirty flights a day at Hawaii Volcano National Park.

PLEASE - ban helicopter overflights at our National Parks.

Correspondence ID:	8	Project: 103522 Document:	118739
Name:	Soares, Daryl		
Received:	Feb,28 2022 18:18:07		
Correspondence Type:	Web F	form	

Correspondence: Helicopter Tour Co. are in the sightseeing business and charge customers for this service. As a for-profit business their routes are defined by the shortest path between tour destinations to provide the lowest cost fares. Also, the quicker the tour route is completed the more tours are possible per day.

A 1994 study sponsored by the Hawaii Department of Transportation was published by UH Professor Panos Prevedouros. This report shows that Helicopter NOISE has the LOUDEST impact of all types of noise in our

community. Fast moving low flying Helicopters on cloudy days over hard terrane produce the greatest degree of noise due to the reflection of the sound between the clouds and hard surfaces.

Helicopter tours customers pay to have a good views. Hawaii is the only state which allows a minimum altitude of 500 feet above ground over residential communities during cloudy weather. Therefore, most of the time they operate at MINIMUM altitudes. The pilots want to complete the route quickly, therefore operates at near MAXIMUM speeds. Hawaii Island is volcanic and our ground is HARD. Also, located at a higher elevations we have more CLOUDY then sunny day per year.

Tour Helicopters produce the greatest noise of any other equipment operated in our community due to the nature of their business.

"Noise annoys, awakens, angers and frustrates people" as published in the State of Hawaii (DOH) Noise Reference Manual.

Correspondence ID:	9	Project: 103522 Document:	118739	
Name:	, Bill			
Received:	Feb,28 2022 18:31:10			
Correspondence Type:	Web F	form		

Correspondence: I have seen national parks over run by commercialism elsewhere in the world. As an American, I have discovered many of us trying to get away from the noise of the city by going to a national park often have the serenity smashed by the arrival of a group of helicopters. While I think both can be accommodated, the new legislation should reflect that the needs of the many should not be outweighed by the needs of the few. Please consider restricting noise pollution to certain times of the day.

Correspondence ID:	10	Project: 103522 Document:	118739			
Name:	,					
Received:		Feb,28 2022 18:57:06				
Correspondence Type:	Web F	orm				
Correspondences. I lived on Wee Vale Pood in Heureijan Acres from 2000-2014, the land still belonge to my						

Correspondence: I lived on Wao Kele Road in Hawaiian Acres from 2009-2014, the land still belongs to my family. Our home was directly on a flight path, the helicopters were constant, often they would be incredibly low (sometimes just above the tree line). Even though I moved away 8 years ago I am very happy to see this issue being addressed.

Correspondence ID:	11	Project: 103522 Document:	118739	
Name:	,			
Received:	Feb,28 2022 19:02:08			
Correspondence Type:	Web I	Form		

Correspondence: As a local resident and frequent visitor to the park, the preferred option is alternative 2. Given the multitude of culturally significant sites and native species in the area this is the only plan that would not interfere with cultural practices or ecosystems protected in the park. It is unreasonable to expect a two month notice for individual cultural practices. With the wording it seems like the park would notify the companies of this practice, but the notification process is not spelled out. How far in advance would an individual need to notify the park of an upcoming practice? Is this just for park approved events or for individual/small group cultural events?

Correspondence ID:	12 Project: 103522 Document: 118739
Name:	Olsen, Kent C
Received:	Feb,28 2022 19:26:59
Correspondence Type:	Web Form

Correspondence: As it is the purpose of National Parks to preserve, as much as possible, the natural environment for the enjoyment of the general public, now and into the future; I view the noise and disturbance associated with the current operation of air tours as an unacceptable degradation of the environment and the collective Park experience.

A few individuals desiring a view from above should not impact Park visitors on the ground, nevermind the disturbance to wildlife in the area. It should not be the burden of the Park Service or the public to prove disturbance, but the responsibility of tour operators to conduct operations in a manner so as to minimize ANY impacts on the Park experience for the public. They DO NOT have a right to conduct business in and around our public resources. The noise of current air operations is clearly impacting experiences in the Parks, as well as disturbing surrounding communities. This disturbance is avoidable.

Drones are banned, yet helicopters are OK? It is clear many more visitors could experience wonderful aerial views of the Park, from safe vantage points, with regulated commercial operation of drones within the Parks, over preapproved routes at pre-approved times, with far less impact to all stakeholders.

I am all for allowing well run commercial tours of our National Parks. Let's harness the technology at our disposal to leverage our stewardship and maximize our resources without degrading them. This is our kuleana. Aloha

Correspondence ID:	13 Project: 103522 Document: 118739
Name:	Chai, David K
Received:	Feb,28 2022 19:33:26
Correspondence Type:	Web Form

Correspondence: Aloha,

Our house lot is immediately across the highway from Kilauea Military Camp. The helicopter tour noise is unbearable throughout the day and stresses my family and our neighbors. I've watched the Apapane change their behavior and fly away in panic as the helicopters approach and the noise level increases. When we are in the Park and exploring its natural resources, the excruciating noise is the worst kind of pollution that contaminates the experience of all who visit the Park. As a native Hawaiian, I appreciate the signs at some points along the crater rim that mandate quiet in respect of our culture. Why does this not apply to the terrible noise from these Helicopters?

Mahalo,

David Chai

Correspondence ID:	14 Project: 103522 Document: 118739
Name:	Cheshire, Robert
Received:	Feb,28 2022 19:43:25
Correspondence Type:	Web Form

Correspondence: Please increase minimum altitude for flights over the areas surrounding Kilauea Caldera and limit the number of flights.

Hiking the Napau Trail I felt like I was back in Viet Nam in 1967.

Correspondence ID:	15	Project: 103522 Document:	118739
Name:	Reathe	rford, CT	
Received:	Feb,28	2022 19:54:15	
Correspondence Type:	Web Fo	orm	

Correspondence: The flight plans need to restricted to coastal/state/federal lands and have them stop flying over private property every day the sun is shining. I have to endure 6 - 12 helicopters flying directly over or within a half mile of my property every single day that there is at least some sun shining. I have contacted the helicopter

tour companies directly, the FAA and Hawaii DOT and everyone says there is nothing they can do because there is no regulation of this industry. So they are free to not only disturb the area of our National parks but also private land holders, with no accountability.

If drones are not allowed to be flown in the park, why are helicopters? If nothing else, restrict the flights to Hawaiian owned tour companies. Each of these companies is owned by out of state organizations and very little of the actual revenue stays in this state to help mitigate the impact.

Correspondence ID:	16	Project: 103522 Document:	118739	
Name:	Collins, Susan			
Received:	Mar,01 2022 04:52:28			
Correspondence Type:	Web Form			

Correspondence: I do not support any helicopter tours in the park. The noise takes away from the joy of walking through the park as a hiker. Helicopter tours are only available to people with certain income and is not a service available to all. This makes the tours an elitist service.

Hawaii Volcanoes National Park is a heavily used park and does not need the added burden of noise from constant tours by helicopters.

Correspondence ID:	17	Project: 103522 Document:	118739
Name:	Yundt, Stephen		
Received:	Mar,01 2022 07:29:28		
Correspondence Type:	Web F	orm	

Correspondence: As a resident of Leilani Estates, I experienced the last major eruption of Kilauea firsthand. For over 6 months, loud helicopters full of tourists flew way too low overhead from dawn to dusk daily. We complained but to no avail. It is our opinion that an ocean-based corridor be established to eliminate noise pollution over neighborhoods of residents. If they traveled via ocean routes and only flew over unoccupied land masses it could be very beneficial. We plea again for consideration of our privacy and our ears!

Correspondence ID:	18	Project: 103522 Document:	118739
Name:	Rawlins, Julie		
Received:	Mar,01 2022 09:00:53		
Correspondence Type:	Web Form		

Correspondence: Say " no" to air tours of Volcanoes National Park: The whole idea of a National Park is to preserve the area in it's natural state for the people to appreciate and enjoy. The park provides a place to appreciate bird sounds and quiet nature. Allowing air tours is not in keeping with the intention of the park. Noise coming from air tours would be awful never mind the visual impact.

Correspondence ID:	19 Project: 103522 Document: 118739
Name:	Carvalho, Christian
Received:	Mar,01 2022 10:25:30
Correspondence Type:	Web Form

Correspondence: Thank you for the opportunity to comment. By way of brief introduction, I am a Hilo native, career Federal employee and lifelong lover and supporter of HVNP. As I look towards retirement, I look towards returning to the Big Island, most likely Volcano Village, where my family has roots going back over a century. No one needs me to tell them of the monumental environmental changes HVNP was already facing decades before climate change became a tragic daily phrase, or of HVNP's importance to Native Hawaiians, the scientific community, and the Big Isle's tourism and service economies. To me personally, that land is as sacred as it gets and

every action that helps to positively protect the park from noise pollution, emissions, invasives and the myriad other challenges is a plus worth paying for. Which is why i am voicing my support, first and foremost, for " Alternative 2," greatly curtailing commercial air activity in and around HVNP, with " Alternative 3" as a second choice. I've hided a good chunk of the park, from my childhood in the 70s through now, and never cease to marvel at and love its incredibly dynamic yet familiar features. The near constant drone of commercial flights and helicopters is a detriment that mars the park and its purpose. My father complained of it as far back as the 1960s, when restrictions were largely nonexistent. The park is sacred space, scientific space, conservation space and yes, recreational space. But there's already enough aircraft noise from USGS, HVO and HVNP craft, which are necessary for study, monitoring, maintenance and other legitimate purposes. Turning Kilauea or the East Rift Zone into a commercially-oriented gawking sphere was, and continues to be, a mistake. It's time to end commercial air tours of HVNP, end the wasteful emissions, end the added noise pollution and put the park and her people first. Thank you.

Correspondence ID:	20	Project: 103522 Document:	118739
Name:	Whirley	y, Jo Ann	
Received:	Mar,01	2022 11:18:47	
Correspondence Type:	Web Fo	orm	

Correspondence: Why not base the helicopters closer to where they fly? It would save fuel, noise and be a potential safety net for them if problems arise, Also, it will reduce their impact on surrounding communities.

Correspondence ID:	21	Project: 103522 Document:	118739	
Name:	McMahon, James			
Received:	Mar,01 2022 11:58:43			
Correspondence Type:	Web I	Form		

Correspondence: As I pilot and a frequent NP visitor, I would like to see a simple and consistent set of nearly universal basic flight rules applied to all national parks including HVNP prohibiting all commercial and private flight operations below 5000'AGL within 1NM of a NP boundary except for QT aircraft operating under a single use special permit. That would be the general rule. These rules would need to be adjusted to accommodate some parks located at higher elevations or parks containing or located near public aerodromes. Parks should remain visually and aurally natural as possible.

As an alternative to low level sightseeing overflights in HVNP and other NPs, I would like to see greater use of unmanned aerial vehicles (UAVs) or fixed cameras operated by the NPS staff or licensed contractors to gather high quality video footage which could be shared in real time with the public over the internet. I believe it will be eventually possible to provide a more immersive and pleasant experience to a much larger set of online viewers using higher resolution and larger aperture cameras, ambient sound recoding equipment than anyone could ever expect to experience from a helicopter or fixed wing aircraft even under ideal flight and viewing conditions. Thanks to technology, it is becoming more practical to experience more of our NPs without having to drive to or fly over them. Whether or not this would universally reduce the environmental and other pressures experienced by the parks is unknown and still needs to be studied. Accessibility would certainly be improved. But this doesn't necessarily reduce the demand for in person visitation overall. But I believe it would at least significantly reduce interest in and therefore the demand for sightseeing flights.

Mahalo for the opportunity to comment on this important topic.

Correspondence ID:	22	Project: 103522 Document:	118739	
Name:	Jackson, Marc			
Received:	Mar,01 2022 13:08:36			
Correspondence Type:	Web I	Form		

Correspondence: The air tours over Hawaii Volcanoes National Oark are very distracting for anyone visiting the park and detract from the overall experience. On a recent trip to the park there was the constant sound of tour helicopters overhead. I wish I could of have enjoyed the natural wonders around me without the constant barrage of helicopter rotors above me. In my opinion the number of air tours allowed to operate in the National Park needs to be reduced quite a bit. That's really the only way that any semblance of serenity can be maintained for visitors on the ground.

Correspondence ID:	23	Project: 103522 Document:	118739
Name:	Burke, Nathaniel		
Received:	Mar,0	1 2022 15:17:26	
Correspondence Type:	Web I	Form	

Correspondence: I advocate for significant reduction or outright cancellation of helicopter / aircraft traffic over Mountain View destined for volcano parks. The noise is fairly constant over my property and I see no reason why visitors can't enjoy the park on foot or by vehicle. I'm not against visitors and tourists, but the helicopter / aircraft noise has gotten out of hand. Thank you for your consideration.

Correspondence ID:	24	Project: 103522 Document:	118739
Name:	Wells, David		
Received:	Mar,01 2022 15:35:15		
Correspondence Type:	Web I	Form	

Correspondence: Aloha Kākou,

I support restricted air travel over HVNP due increased noise levels on visitors and the soundscape.

Studies have shown that helicopter noise has an effect on the soundscape and affects birds and others animals in the area. To reference Karen Gallardo's thesis, Helicopter noise in Hawai'i's protected natural areas changes temporal characteristics, of songbird vocalizations, some of the effects are: changes in songs/calls, increased activity, increase in stress behavior, brain injury, heart beats faster, increase in stress hormones, decrease in ability to find mates, decrease in hatching success. On a personal level, it can be hard to hold a conversation when the helicopters are in proximity. I like to enjoy the outdoors for many reason, but one is the quiet it offers in this louder and louder world.

Please limit the noise. Mahalo,

David

Correspondence ID:	25	Project: 103522 Document:	118739
Name:	Wilson, Carol A		
Received:	Mar,01 2022 20:40:41		
Correspondence Type:	Web I	Form	

Correspondence: We recently visited Volcanoes National Park and loved it. However, we were frustrated and disappointed that the peace and quiet of our hikes was disrupted by helicopters flying over the eruption area. They are so loud and their noise carries over a large area. I'm glad that helicopter flights are being reconsidered.

Correspondence ID:	26	Project: 103522 Document:	118739
Name:	Chase, Marjorie		
Received:	Mar,02 2022 08:01:22		
Correspondence Type:	Web Fo	orm	

Correspondence: Please consider alternative 2. As a frequent hiker in the park, the helicopters flying overhead are quite distracting and take away from the peace. I imagine it is especially unpleasant for the native birds as well. Alternative 2 would allow visitors to still see the area from the air while lessening the noise impact as we see more visitors and hence more traffic over the area. I believe it is a very good compromise.

Correspondence ID:	27 Project: 103522 Document: 118739		
Name:	De Villiers, Rachel K		
Received:	Mar,02 2022 10:52:06		
Correspondence Type:	Web Form		

Correspondence: Alternative #2 is the only option that should be considered. The noise caused by airtours is unacceptable! I am a Native Hawaiian who believes it not only disrespectful for Volcanoes National Park to allow this, but it is detrimental to the health and well being of all those who live near the Park and visit it. The penetrating sound pollution of helicopters and planes gives me headaches. Stop the air tours please!

Correspondence ID:	28	Project: 103522 Document:	118739
Name:	Haun, Jeffrey S		
Received:	Mar,03 2022 17:24:46		
Correspondence Type:	Web F	orm	

Correspondence: I believe Alternative 2 should be implemented. I have been to the Park many times and found there to be too much helicopter noise. It is contrary to the purpose of the Park to allow artificial noise at this level. It is obvious and common sense to me that the park can only be genuinely experienced first hand and without helicopter noise. This experience should be the Park's highest priority. This is experience cannot happen from inside a plane or helicopter or when one is flying nearby.

29 Project: 103522 Document: 118739		
Diaz, Gabriele M		
Mar,04 2022 03:52:45		
Web Form		

Correspondence: We don't want any helicopters or other air service flying over the National Park nor the community. This is a peaceful area and we don't want the constant noice invasion around us.

Correspondence ID:	30	Project: 103522 Document:	118739
Name:	Dunni	ng, Jeanne	
Received:	Mar,04 2022 11:06:39		
Correspondence Type:	Web F	orm	

Correspondence: re: plans to allow helicopter tours over the park

I urge you with all my heart not to allow helicopter tours to fly over the crater and park lands. This place is like no other on earth, and one of its most precious qualities is the profound silence you can experience while hiking through or sitting in this immense space. There is no need for helicopter tours when it is so easy to drive up and enjoy the amazing views, and walk a ways into the crater or further and enjoy the stillness and power of the unique landscape and vast sky.

Please please do not allow this unnecessary desecration to the heart of East of Maui. Mahalo, Jeanne Dunning Received:

Mar,04 2022 11:06:40

Correspondence Type:

Web Form

Correspondence: re: plans to allow helicopter tours over the park

I urge you with all my heart not to allow helicopter tours to fly over the crater and park lands. This place is like no other on earth, and one of its most precious qualities is the profound silence you can experience while hiking through or sitting in this immense space. There is no need for helicopter tours when it is so easy to drive up and enjoy the amazing views, and walk a ways into the crater or further and enjoy the stillness and power of the unique landscape and vast sky.

Please please do not allow this unnecessary desecration to the heart of East of Maui. Mahalo, Jeanne Dunning

Correspondence ID:	32	Project: 103522 Document:	118739
Name:	Atwell, John		
Received:	Mar,04 2022 12:04:23		
Correspondence Type:	Web F	orm	

Correspondence: As I sit enjoying my morning coffee and the glorious sound of the native birds at 8:40 am on this lazy Friday morning, the tranquility of my homestead here in the Kurtistown-Mountain View Area is rudely taken from me, without so much as a "by your leave," by the sound of rotating blades above, which drown out the quiet and nature's music, prompting me to act on my earlier intentions of submitting comments on this issue of corporate inconsideration, of unneighborly profit chasing. Interestingly, as I read the verbiage on the NPS website that leads to this comment form, it notes " The potential alternatives consider several factors such as natural and cultural resources, wilderness character, visitor experience, and Native Hawaiian Traditional Cultural Properties including Native Hawaiian sacred sites and ceremonial areas." Disappointingly absent is any mention of the impact on local residents, whose lives are rooted along the flight paths. The behavior of the helicopter companies and the federal government (through FAA and now NPS) is far from the storied Aloha of yore, which some say is dying precisely because of this type of insensitivity and inconsideration by outsiders.

I strongly support efforts to move flight paths away from residential areas.

Correspondence ID:	33	Project: 103522 Document:	118739
Name:	HOWA	RD, JUDY S	
Received:	Mar,05	2022 02:42:37	
Correspondence Type:	Web Fo	orm	

Correspondence: The number of flights should be severely restricted. They are a nuisance to everyone around them, and detract significantly from the enjoyment others can take of their environment. Why should five or six people be entitled to impose so much unpleasantness on the many others who have come to visit the park?

Minimum elevation of the few permitted flights should be raised, and then enforced. That's a huge problem. Generally, when complaints are made, we are informed that the minimum flight altitudes are unenforceable because methods of measuring altitude available to the public are unsatisfactory. The burden should be shifted to the operators. If there's a complaint, they should be required to prove that they have not violated the minimum altitude laws. If they cannot do so, their license to operate in that airspace should be revoked.

Correspondence ID:	34	Project: 103522 Document:	118739
Name:	Friesen	, Christian	
Received:	Mar,05	2022 11:28:57	
Correspondence Type:	Web Fo	orm	

Correspondence: Dear comment reviewers,

I shall begin by saying that I strongly support the no-overflights alternative.

Our national parks are places to relax, hike, observe/enjoy nature and witness historical culture. Every single one of these important activities is disturbed by noisy overflights.

Loud helicopter flights are a theft, where a half dozen passengers obtain some enjoyment, but only by stealing from the peace and quiet of thousands of people quietly pursuing their on-ground activities.

Please follow national park practice and forbid all non-essential flights over the park.

Respectfully, CF

Correspondence ID:	35	Project: 103522 Document:	118739	
Name:	,			
Received:	Mar,05 2022 12:53:14			
Correspondence Type:	Web F	form		

Correspondence: I have always thought of National Parks as refuges where people can commune with nature in a peaceful and beautiful environment and wild animals can wander freely without fear. The deafening noise of tour helicopters overhead negates any possibility of this and I am therefore totally opposed to allowing them to fly over Hawaii Volcanoes National Park. And when the volcano is erupting the situation becomes much worse. We also have to consider giving respect to Native Hawaiians and their ability to conduct spiritual practices in the park.

I therefore support Option 2 - the No Fly Alternative.

Correspondence ID:	36	Project: 103522 Document:	118739
Name:	Friesen, Amy		
Received:	Mar,05 2022 16:51:38		
Correspondence Type:	Web Form		

Correspondence: Option 2 is preferable, as far as I am concerned.

Option 1 does nothing to improve the problem of helicopters flying over the park and interfering with people's enjoyment of this beautiful natural area. The vast majority of people who visit the park do not visit by helicopter: but that majority is impacted negatively by the interests of helicopter operators and visitors who come via helicopter. Helicopters over the park are like motorcycles with no mufflers to reduce sound: the person who has the motorcycle may enjoy their own experience, but this is at the expense of the peace & amp; quiet of everyone around them. In addition, there may be harms to native species, such as the nene, tropic birds, and honey creepers who make the park their home.

Options 3 & amp; 4 may somewhat reduce problems with option (1); but they continue to have the same problems, just to a bit lesser degree. Having some days where helicopters can continue to interfere in the experience for other visitors to the park unfairly harms those who cannot arrange to go at times when helicopters are disallowed. Overflights of any sort may continue to negatively impact bird life at the park.

No option, besides (2), does justice to the values that native Hawaiians place on keeping the park be an area of special religious and cultural significance. Just as one would not want a helicopter flying over one's church during service, Hawaiians may not want helicopters flying over a place of tranquility and spiritual significance that is meaningful to them. Although I am not a native Hawaiian, I too feel that the park should be a place of tranquility.

Correspondence ID:	37	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,05 2022 18:00:13		
Correspondence Type:	Web F	Form	

Correspondence: People visiting the park deserve to be able to enjoy it without being subjected to the air pollution and noise helicopters cause. Helicopter tours are a pricey and environmentally damaging way of engaging with the island and their impact on quality of life for island residents should be enough to rule them out.

Correspondence ID:	38	Project: 103522 Document:	118739
Name:	Taylor, Daniel		
Received:	Mar,05 2022 22:23:41		
Correspondence Type:	Web Fo	orm	

Correspondence: Narrative that describes air tour and Park objectives are clear, but deeply flawed because none of the four alternatives accounts for impacts on the many communities that lie under all of the described flight patterns.

Perceived impacts on park natural and cultural resources are briefly and accurately recorded. The air tour industry position on most issues is noted, but mostly not explained with reference to FAA purpose and goals.

For the following reasons I find none of the four alternatives to be acceptable:

Correspondence ID:	39	Project: 103522 Document:	118739
Name:	Taylor, Daniel		
Received:	Mar,05 2022 23:47:10		
Correspondence Type:	Web F	form	

Correspondence: Your draft ATMP is written clearly with four alternatives well organized and properly concise. I notice the Park's articulation of overflight impacts are accurate and consistent with the Park's mission and purpose. I regret the FAA's statements of mission and purpose are not precise or relevant to the purposes of this ATMP.

The Park consistently expresses its purpose to protect natural and cultural resources, though might expand to more fully explain the importance of tranquility and the harmful impact of aircraft (especially helicopters) intrusion upon the expectations of those who are in spacious and tranquil settings. This expectation should not apply only to the four designated Wilderness Areas, but also to the Kilauea summit trails and pathways.

The FAA primary purpose is to promote safety of aircraft operations. There seems to be a secondary purpose to exploit all available air space, to the extent that pilot have been known to lament the denial of air space by regulations promoted by the National Park Service, and other land management entities. It must be remembered that the National Park Service (Hawaii Volcanoes was established in 1916) has been in operation long before there were industrial air tour operations.

The narrative explains that fewer than 5% of annual visitation to the park are passengers in air tours. One must consider that this category of visitor imposes a significantly greater proportion of impact, in a relatively short visit. Contrarily, visitors on the ground are subject to the sounds of aircraft motors and the sight of circling aircraft often for most hours from 8AM to 4PM every day, as tour operators rotate their customers in shuttle fashion from landing sites to scenic destinations.

Alternatives 3 and 4 absurdly make reference to "Quiet Technology." The FAA invokes this myth without defining what makes a helicopter "quiet," and with no explanation about the technical manipulations the operators will provide. Nor does the FAA provide any measure of noise or visibility mitigation that would provide a tangible result. A visitor in a serene and tranquil environment would probably not be capable of reconciling the intrusion of an overhead flying vehicle with a theoretical "Quiet Technology."

I recommend none of the four alternatives be implemented. Rather, I recommend an alternative that would prohibit commercial air tours in all parts of the national park. Furthermore, I would recommend that this ATMP be significantly expanded to include air tour impacts on communities that are near the park and are therefore subject to the noise and intrusion of flights that are destined for the park The Covid-19 pandemic restrictions that reduced movement of visitors, which prevailed for nearly two years, provided a significant measure of relief from

air tours. This had the effect of reminding most of us how precious the quiet skies in the park and the communities can be. Such a welcome relief validates the virtue of a no-fly alternative.

Correspondence ID:	40	Project: 103522 Document:	118739
Name:	BEGG	, JOHN P	
Received:	Mar,0	7 2022 09:23:53	
Correspondence Type:	Web F	orm	

Correspondence: Personally, I have taken helicopter flights over Niagra Falls and the Kilauea eruption of 2018. It is a disappointing experience, anticlimactic, and doesn't meet expectations.

I oppose any flights over residential areas.

HVNP flights must be high enough altitude to avoid noise disturbance to on-the-ground park visitors and Volcano House guests.

Correspondence ID:	41 Proj	ject: 103522 Document:	118739
Name:	DeCamp, Bo	ob	
Received:	Mar,07 2022	2 15:27:07	
Correspondence Type:	Web Form		

Correspondence: To be fair, the latest effort to manage air tours has little to do with protecting the physical "resources and wilderness." After all, air tours do no damage to the environment, causing only a temporary sound footprint. In fact they prevent damage by significantly reducing the number of people who hike into the wilderness. If the idea is to protect the environment, hiking should be banned immediately, because it causes much more damage than air tours. The real issue is and always has been about the visitor and residents' "experience," which is a very valid concern. I told the tour operators years ago, when I was president of the Hawaii statewide helicopter association, that they will see attempts at "management" again and again until they agree to have flight-tracking equipment onboard every aircraft which would record where each tour went, including its altitude. This would allow for the establishment of designated "deterrence areas" which would minimize or eliminate flights and/or set minimum altitudes over popular hiking areas, sacred landscapes and residences. I believe such technology is now installed on all tour aircraft. A suitable, fair (to all stakeholders) system just needs to be implemented.

For an apples-to-apples comparison, when airlines fly over the islands and take off and land at every airport around the state, it's impossible for them not to disturb a portion of those on the ground. Similarly, air tours unavoidably annoy a segment of the visitor and resident population. The key is to agree to an overflight program and to have the ability to monitor it, so pilots/operators can be penalized when they don't follow it (unless safety precludes it). As long as Hawaii is such a popular destination, it will never be possible to satisfy everyone, but it's definitely possible to reduce and to "manage" the overall nuisance factor of air tours, just as is done with airlines at airports. It would be unfair to treat air tours differently than normal air traffic and it would be a travesty to greatly hinder them. Air tours not only protect the environment and contribute enormous benefits to the economy, they also afford hundreds of thousands of visitors, including the elderly and disabled, the opportunity to experience the unmatched beauty of Hawaii, which they otherwise could not have done.

Correspondence ID:	42 Project: 103522 Document: 118739
Name:	Donlon, Timothy A
Received:	Mar,08 2022 12:01:50
Correspondence Type:	Web Form

Correspondence: The increasingly incessant flyovers of helicopters is becoming a grave nuisance and has an increasingly negative impact on our health. I moved here to get away from such intrusions. The flyovers have

become nearly constant in the past months. Please limit the number of flyovers so that more people may enjoy the solitude and don't let the urban environment eliminate our greatest resource!

Correspondence ID:	43	Project: 103522 Document:	118739
Name:	Hendrickson, Cheryl		
Received:	Mar,08 2022 12:31:11		
Correspondence Type:	Web Form		
Correspondence: Alternative 2 is the only choice to protect Volcanos National Park.			

The NPS was established to give the public access to quiet enjoyment of these special places free of urban sounds for perpetuity.

Aviation tours interfere with the natural soundscape. They negatively impact bird and wildlife behaviors, interrupt cultural practices and

visitor experience and solitude. The sky quality is hindered as well as naturally occuring wind and weather sounds.

Air traffic should only be allowed for search and rescue as well as fire prevention, control and extinguishing.

Please adopt Alternative 2 to preserve the original intention of the NPS and protect Volcanos NP from the exploitation and greed of this selfish industry.

Many Mahalos

Correspondence ID:	44	Project: 103522 Document:	118739
Name:	Hessler, Scott C		
Received:	Mar,1	0 2022 14:18:47	
Correspondence Type:	Web F	orm	
Correspondence: Aloha,			

I am writing regarding helicopter tours over Haleakala National Park on Maui, Hawaii. I strongly suggest Alternative 2 - no helicopter tours over Haleakala. This is a wilderness area where people go to enjoy the quiet solitude that is a critical characteristic of this place. Personally, I would describe the quiet and solitude one of the main experiences here; it is the essence of this Hawaiian place. This place is considered the quietest place on Earth down to 0 decibels. There is no place like this on Earth. To have loud helicopter engines or drones in the vicinity of this crater will destroy that environment. This is a peaceful place like no other and helps the endangered species thrive in peace and flock and fly over the crater. I believe the helicopters noise and heavy wind turbulence that comes with them will affect the endangered Hawaiian Nene goose with a negative impact. They are finally thriving more, and I would hate to see their population decline quickly again because of the helicopters and drones. I have commented in support of :

2). No helicopter tours whatsoever over Haleakala and a buffer created so that helicopters cannot be heard even if they are skirting the outer areas.

Respectfully,

Scott C. Hessler

Correspondence ID:	45	Project: 103522 Document:	118739
Name:	P, Erin		
Received:	Mar,10 2022 14:22:53		
Correspondence Type:	Web Fo	orm	

Correspondence: Alternative 2 - no helicopter tours over Haleakala

Correspondence ID:	46	Project: 103522 Document:	118739
Name:	Newman, Jesse G		
Received:	Mar,10 2022 14:29:33		
Correspondence Type:	Web For	rm	
Correspondence: Nene, Endangered , state bird, The reservation implication was made for noise and amount of people, Keep helicopters away from this amazing and sacred place. Jesse Newman Resident and environmental enthusiast			
Correspondence ID:	47	Project: 103522 Document:	118739
Name:	francis, l	kirk h	

Correspondence Type: Web Form Correspondence: NO helicopter air traffic in volcanos park!

NO NO NO!!

Received:

whoever thought that idea up must work for the helicopter companies, as they clearly do not have the PEOPLE', much less the park's, best interests in mind.

Mar,11 2022 09:22:10

to repeat: NO helicopters in volcanos park!!!!!!!

Correspondence ID:	48	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,12 2022 10:03:00		
Correspondence Type:	Web F	form	

Correspondence: Asking for comments and then threatening people with public disclosure of personal information? Who benefits?

I live near the park for a reason....so that I can be in quiet nature often, of course the choppers destroy that experience and property values also. This should be a no brainer. Even science says our health benefits from quiet time spent in nature. To add insult to injury, choppers use the airspace over Bird Park to hover and wait their turn. Bird Park is where people go to hear birds! Not mechanical ones!

This issue is totally about wealth. The wealthy are the ones with the choppers, or can pay for rides in the choppers, so they get to destroy everyone else's experience. Evidently the wealthy need to be the center of attention and we get to pay homage whether we want to or not, But these are public lands for the benefit of people who actually pay taxes, which the wealthy know how to avoid. One cannot fly a drone in the park but huge noisy choppers which can do much more disruption than drones are allowed? What about the affect on wildlife? Noise is the biggest complaint of humans, it's got to be worse for animals

The wealthy can afford to buy their own nature and fly over it all they want.

All land of Hawaii is sacred to the Hawaiian people and especially Volcanos National Park. The total lack of respect shown by helicopter companies and the government agencies that allow them makes democracy a joke. Even the United Nations says Hawaii was "acquired" illegally by the USA, so our access to the volcanos is only by the grace of the true Hawaiian people.

Received:

Mar,12 2022 16:56:25

Correspondence Type:

Web Form

Correspondence: It seems obvious that you are starting from an extreme environmentalist perspective, inconsistent to some degree with the your mission to allow people to enjoy the parks. We cannot all hike any considerable distance. That said,

Alternative one-- that you label "no action" and unacceptable-- seems to be concern for nothing. First of all, one operator is flying 75% of the flights, and all operators together are flying less than HALF of the IOA, meaning that limiting flights to half of the current IOS might accomplish most of the desired results without affecting the ability of tourists to enjoy the park, or damaging the business and livelihoods of the operators.

Alternative 2 is clearly too extreme. It denies people the ability to enjoy the park in one particularly appropriate way-- from the air. It also damages the economy and puts a number of companies out of business unnecessarily. It could be labelled "too MUCH" action.

Alternative 3 makes sense, until you get to the details. What, for example, is the reason to restrict the hours of flights? It seems that would only crowd the flights into a narrow window, making the noise, etc. worse during that time. It also suggests a "cap" on annual flights that could be "a minimum of 1" when the status quo is already less than HALF the IOA. Setting the minimum should be 35% and a maximum of 50% of the IOA would be a huge CUT in the allowed total flights, but with minimal disruption to the visitor experience. I recommend it as the best compromise all around.

Alternative 4 is simply unacceptable, just slightly less onerous than Alternative 2.

Correspondence ID:	50	Project: 103522 Document:	118739
Name:	cabral	, syl	
Received:	Mar,13 2022 17:02:34		
Correspondence Type:	Web F	orm	

Correspondence: I VOTE ZERO helicopters over Haleakala. Sure to interfere with observatories. why let a couple of people get rich and ruin an entire island eco system, people's right to visit the grounds and enjoy the quiet of the Mountain. The House of the Sun.

Correspondence ID:	51	Project: 103522 Document:	118739
Name:	, Gary		
Received:	Mar,15 2022		
Correspondence Type:	Web Form		

Correspondence: Flights should be significantly reduced (to 4-6 per day), sensitive areas should be closed except for occasional scientific flights (i.e. 1 per week), and minimum altitudes should be increased by 500 ft.

Correspondence ID:	52	Project: 103522 Document:	118739
Name:	, frederickjh		
Received:	Mar,15 2022		
Correspondence Type:	Web I	Form	

Correspondence: I think that the use of Quiet Technology incentives and the FAA Fly Neighborly training in alternatives 3 and 4 would not only benefit those in the park but those of us that live in neighborhoods that get flown over regularly at low altitudes many days with multiple flights carrying helicopter tourist. There are days where multiple helicopter flights pass directly over my property or the neighboring properties, sometimes the sound from the first helicopter has not yet subsided before we hear the second one approaching.

It is too bad that the Federal Government mandated ATMP only seeks to lessen the noise in the park and ignores the fact that these tourist helicopter flights have to cross over communities to even get to the park. There should

also be some restrictions regarding these for profit flights and the noise they make for those living in areas they fly over as well.

Correspondence ID:	53	Project: 103522 Document:	118739
Name:	Wakat	, Karie	
Received:	Mar,1	5 2022 22:47:31	
Correspondence Type:	Web F	orm	

Correspondence: As a resident of Hawaii Island I have seen an increase in helicopter tours in general. And since October 2021 I personally have been subjected to daily tours flying directly over my home 4 times a day starting at 730 Am. The helicopter(s) fly low enough that my house shakes and I can see the pilots face. It is very intrusive, and frankly down right disturbing that tourists are looking into my house and property. The helicopter(s) are flying directly from or near the Kona (KOA) airport to Volcanos National Park. I live on the slop of Hualalai volcano at 2500 feet in the forest. The helicopter(s) are intrusive to the native wildlife as well. Our federally listed endangered Hoary bat lives here along with a host of other endemic aviary wild life.

I 100% support the option to set a single flight plan, and limit the number of daily tours.

Correspondence ID:	54	Project: 103522 Document:	118739
Name:	Miller	Bonnie	
Received:	Mar,1	6 2022 11:27:17	
Correspondence Type:	Web F	orm	

Correspondence: I've been hearing a growing number of copters over HPP lately--with great dismay. They are incredibly loud and long lasting. How can this be after so much time, so many complaints, and even a serious helicopter accident? I suppose it's all about money. Those making a profit off of our peace and quiet are apparently making money for the politicians who do nothing about this problem. I'm not surprised--I'm just growing more and more cynical. Any delay beyond the August 2022 deadline is unacceptable!

Correspondence ID:	55	Project: 103522 Document:	118739
Name:	Kudra	y, Gregory M	
Received:	Mar,10	5 2022 15:53:26	
Correspondence Type:	Web F	orm	

Correspondence: Thanks you so much for updating this plan! An update is sorely needed, the noise from helicopter tours is nearly constant within the park during good weather and significantly diminishes the visitor experience. The benefits to a small group of companies and clients is not worth the extreme degradation of the visitor experience. I strongly support alternative 2 with the maximum restrictions on air flights.

Correspondence ID:	56	Project: 103522 Document:	118739
Name:	Maly,	Onaona	
Received:	Mar,1	6 2022 19:57:03	
Correspondence Type:	Web F	Form	

Correspondence: Emergency Air Traffic Only over HAVO Lands.

To quote John Muir, a foundational contributor to the vision and mission of National Parks, "No synonym for God is so perfect as Beauty. Whether as seen carving the lines of the mountains with glaciers, or gathering matter into stars, or planning the movements of water, or gardening - still all is Beauty!"

For Native Hawaiians, that "perfect beauty" is the honua ola/'āina--the wahi pana (storied/sacred landscape)--where its myriad voices of our biocultural landscape may be heard without the intrusion of air traffic. We must do everything we can to maintain the sanctity of place, where the natural living environment may speak

to, and heal us. The incessant intrusion of helicopters (and other aircraft) has a significant impact on the voices of nature and one's ability to commune with God (Goddesses).

Keeping Air Tour Traffic out of the park boundaries is the preferred choice and is in alignment with the NPS mandate. Experience the living landscape from afar, or visit it on foot as our kūpuna (ancestors) did.

Correspondence ID:	57 Project: 103522 Document: 118739
Name:	Naidu, THalia
Received:	Mar,17 2022 10:38:02
Correspondence Type:	Web Form

Correspondence: I support helicopter tours over the active volcanic eruptions as they offer some of the most spectacular viewing especially to the elderly, handicapped. those with limited time on the island, and those who are unable to access overcrowded and underserved access venues within the park. Sometimes the eruption activity is not accessible on foot at all. That being said, their routes should be over the ocean at a high as possible altitude and away from residential areas from all approach angles. Limiting the number of flights to minimize impacts within the park should also be considered. I live on South Point Rd and we typically have at least one a day fly over. some have gone directly over our house. The noise is disruptive not only to humans, but the agricultural animals, native birds. We deliberately purchased our property in a rural area to enjoy the peace and quiet. I can't imagine how disturbing it must be with multiple flights over the Puna district. Mahalo for your consideration in this regard.

Correspondence ID:	58	Project: 103522 Document:	118739
Name:	Alexan	der, Daniel	
Received:	Mar,17	2022 13:14:24	
Correspondence Type:	Web F	orm	

Correspondence: Helicopter overflights are completely incompatible with Wilderness Areas. While there are many considerations and I applaud the draft plan for considering many of these, flights over or within 0.5-miles of Wilderness Areas should be an absolute red line. These areas are supposed to allow for experience of nature in it's rawest form, they offer something that is rarely available today to get away from all the traffic and built world that surrounds us and to truly experience nature. Helicopters flying overhead completely destroy this experience. Therefore, Alternative 1 should be dismissed (period!). Secondly, Alternative 3 should be modified to push the flight path at least 0.5-miles out from the Kau Desert Wilderness Area. Thirdly, the "Coastal Route" in Alternatives 3 and 4 should be modified to require flying at least 0.5-miles out from the Kau Desert Wilderness Area.

Thank you for your work on this. I look forward to the adoption of these rules that take into the above comments. I think this will be a giant win for Volcanoes National Park and all the public that visits it.

Correspondence ID:	59	Project: 103522 Document:	118739	
Name:	Tester	Tester, John		
Received:	Mar,1	Mar,17 2022 14:39:48		
Correspondence Type:	Web F	Form		
Correspondence: PPPPPPPPP				
Correspondence ID:	60	Project: 103522 Document:	118739	
Name:	Tester, John			
Received:	Mar,17 2022 14:43:19			
Correspondence Type:	Web Form			

## Correspondence: PPPPPPPP

Correspondence ID:	61 Project: 103522 Document: 118739
Name:	Morrison, Gayle
Received:	Mar,17 2022 15:20:11
Correspondence Type:	Web Form

Correspondence: Helicopter tours over our national parks, including Hawaii Volcanoes, should be extremely limited, if not entirely curtailed. The current situation has gone on too long and is unacceptably abusive.

Correspondence ID:	62	Project: 103522 Document:	118739
Name:	Gawel	, Michael	
Received:	Mar,1	7 2022 19:43:21	
Correspondence Type:	Web F	orm	

Correspondence: Will a separate Hawai'i Volcanoes National Park Air Tour Management Plan be created to address future use of unmanned drones for virtual air tours?

Correspondence ID:	63	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,1	7 2022 19:44:35	
Correspondence Type:	Web F	Form	

Correspondence: Limiting a VFR sightseeing flight to specific routes and minimum altitudes has historically proven to be extremely dangerous. This leaves the pilot with very few options when encountered with adverse weather conditions.

Even if the pilot is offered an option to deviate because of conditions, but then required to "report the deviation to the FAA", this will be considered by pilots as a "last ditch" option, and the danger will absolutely increase substantially because of this. Would YOU like to be on a flight where the pilot feels he has limited route and altitude choices when the weather gets bad?

The "options" presented all appear to be dictating routes, and this is absolutely and definitively an increase in risk and danger to the flight. A better solution entirely would not limit routes or altitudes in remote areas at all, and would instead present limitations on approaching sensitive public areas, either by altitude or an exclusion zone, or possibly both. A small selected area to "avoid" is a substantially safer alternative in the flight environment, rather than a required "route".

In light of this, my strong opinion is that none of the new alternatives are acceptable, and a safer choice is to leave AS IS.

- Jay Smith

Correspondence ID:	64	Project: 103522 Document:	118739
Name:	Chang	, Jeff a	
Received:	Mar,1	7 2022 23:46:50	
Correspondence Type:	Web F	form	

Correspondence: These over flights are at best a noise nuisance and an unnecessary affront to indigenous beliefs long ignored. It is only those who can afford such who engage in this practice. Maybe trying to understand the perspective of those who actually care for our home might be offered instead of blindly seeking to profit. Enough of the neglect already. When will you listen. Not just to hear us but to listen.

Correspondence ID:	65	Project: 103522 Document:	118739
Name:	Delga	dillo, Sarah	
Received:	Mar,1	7 2022 23:58:08	
Correspondence Type:	Web F	Form	

Correspondence: I am opposed to all helicopter tours. The noise is a nuisance and it not only disputes the residents quality of life but the experience of anyone on the ground. I propose a hard stop to all helicopter and drone activity in the Park.

Correspondence ID:	66 Project: 103522 Document: 118739	
Name:	Tester, John	
Received:	Mar,18 2022 07:08:16	
Correspondence Type:	Web Form	
Correspondence: Test message body		
Correspondence ID:	67 Project: 103522 Document: 118739	
Name:	Stanberry, Shanon	
Received:	Mar,18 2022 12:55:45	

Correspondence Type:

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plans for Hawaii Volcanoes National Park.

Web Form

I have serious concerns with the development process of the Air Tour Management Plans (ATMP) by the National Park Service (NPS) and the Federal Aviation Administration (FAA). NPS and the FAA have ignored 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. Excluding the NPOAG from providing input on the ATMP process is in direction contradiction of FAA Order No. 1110.138A.

NPS does not have the necessary expertise to fundamentally redesign the airspace over these parks. The ATMPs proposed by NPS would relocate, constrict, and combine flight routes and would make substantial changes to flight altitudes. The current flight routes and altitudes have been in place for years and are well understood by industry. The changes proposed by ATMP have severe aviation safety implications that should have been deliberated in the NPOAG, as Congress intended in the National Parks Air Tour Management Act of 2000.

The proposals currently under consideration will force aircraft into potentially unsafe flight conditions. The NPS has proposed increasing the minimum flight altitude over Hawaii Volcanoes National Park from an allowed minimum 500 feet AGL to 1,500 feet AGL, which does not provide adequate safe options for navigation in typical weather patterns that exist in the park. Even more concerning is that the proposals have fixed narrow flight routes that do not take into account the areas constantly changing weather patterns.

I also have serious concerns with the economic impact these plans will have on helicopter air tour companies. The draft plans' flight allocation numbers do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change and NPS needs to respect that dynamic, as visitors alter their destinations according to those trends.

The NPS has failed to reach out to the operators to enquire what economic impacts might arise implementing a management plan that restricts overflights. Operators are already suffering economically post COVID-19, loosing over 80% of their businesses due to the shutdown of international travel. Further restrictions will cripple an already fragile industry trying to rebuild.

In 2020, Hawaii Volcanoes National Park welcomed 590,000 visitors, a 57% decrease from 2019 when the park welcomed over 1,300,000 visitors. This year many National Parks saw their resources strained by the large number of visitors as the public began to travel again. Air tours are an important option for many visitors conducting a one-in-a-lifetime trip to see famous natural landmarks. Visitors taking advantage of air tours benefit by avoiding traffic, wait times, and walking trails that are inaccessible for the handicapped or elderly, while reducing congestion and demand on park infrastructure.

Like ground-based tours, air tours are a valid part of our visitor experience, providing a unique window from which we can share our cultural, historical and environmental sites with the world. Air tours require no ground-based infrastructure at the park, which allows visitors accessibility without the need for roads, trails, signs, bathrooms, garbage cans, or other services.

By further restricting an already limited number of allowable air tours, we are reducing opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance. Through carbon-offset efforts and strict altitude requirements to control noise just to name a few efforts air-tour operators are working to ensure they are responsi

Correspondence ID:	68	Project: 103522 Document:	118739
Name:	Carver, Tyler		
Received:	Mar,18 2022 12:59:56		
Correspondence Type:	Web F	orm	

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plans for Hawaii Volcanoes National Park.

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Correspondence ID:	69	Project: 103522 Document:	118739	
Name:	Zager, Morrie			
Received:	Mar,18 2022 13:01:43			
Correspondence Type:	Web F	orm		

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plans for Hawaii Volcanoes National Park.

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Correspondence ID:	70 Project: 103522 Document: 118739
Name:	Simpkins, TJ
Received:	Mar,18 2022 13:07:53
Correspondence Type:	Web Form

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plans for Hawaii Volcanoes National Park.

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Correspondence ID:	71	Project: 103522 Document:	118739
Name:	LONE	OO, ROBERT	
Received:	Mar,18	8 2022 13:09:46	
Correspondence Type:	Web F	orm	

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plans for Hawaii Volcanoes National Park.

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Correspondence ID:	72	Project: 103522 Document:	118739
Name:	Hunti	ngton, Thomas	
Received:	Mar,1	8 2022 13:20:24	
Correspondence Type:	Web F	orm	

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Correspondence ID:	73	Project: 103522 Document:	118739
Name:	Meiris, Jessica		
Received:	Mar,18 2022 13:24:22		
Correspondence Type:	Web F	form	

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Correspondence ID:	74	Project: 103522 Document:	118739
Name:	Buehl	er, Andrew	
Received:	Mar,1	8 2022 13:24:53	
Correspondence Type:	Web I	Form	

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Correspondence ID:	75	Project: 103522 Document:	118739
Name:	Troha	, Todd	
Received:	Mar,1	8 2022 13:44:02	
Correspondence Type:	Web F	orm	

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Received:

Mar,18 2022 13:56:13

Correspondence Type:

Web Form

Correspondence: Your plan does not go far enough! The enjoyment of our national parks and state parks is being significantly impacted by air tours. While your plan does place some restrictions on air tours, it still favors the air tour industry. It's like you, as well as the FAA, are overly influenced/controlled by the air tour industry. Why? The only good this industry brings to Hawaii is a relatively few jobs and some tax income. The good is to the tourists at the cost of residents. The residents of Hawaii will applaud significant curtailment and regulator of this industry out of control.

The altitude at which they fly needs to be increased. They are very disruptive to those on the ground. Not just in the national parks, but also anywhere on their tour flight path. The residents of Hawaii have been forced to endure the significant level of community disruption due to the rapidly increasing number of air tours. Per capita, Hawaii has more air tours than anywhere in the country.

The number of air tours, both helicopter and fixed wing, needs to be reduced significantly. Consider rolling back the number of flights to the number in 1990. The number of air tour operators also needs to be capped. Demand based control does not work. There must be a physical limit, much like the number of liquor stores allowed is controlled.

Finish the plan. Enforcement of violations of the plan. And significantly penalize. even ban those who chose to violate the plan. Make this count!

Thanks for your work and for seeking some public input.

Correspondence ID:	77	Project: 103522 Document:	118739
Name:	Withy	combe, William	
Received:	Mar,1	8 2022 14:12:32	
Correspondence Type:	Web F	Form	

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Correspondence ID:	78	Project: 103522 Document:	118739	
Name:	Lee, James			
Received:	Mar,18 2022 14:18:00			
Correspondence Type:	Web Form			

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Correspondence ID:	79	Project: 103522 Document:	118739
Name:	PLOE	TZ, FREDERICK	
Received:	Mar,1	8 2022 14:31:05	
Correspondence Type:	Web F	orm	

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Correspondence ID:	80	Project: 103522 Document:	118739
Name:	Brayall, Kari		
Received:	Mar,18 2022 14:37:39		
Correspondence Type:	Web F	orm	

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Correspondence ID:	81	Project: 103522 Document:	118739	
Name:	Halvorson, Kent			
Received:	Mar,18 2022 15:04:22			
Correspondence Type:	Web F	orm		

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Correspondence ID:	82	Project: 103522 Document:	118739	
Name:	Fitzpatrick, Brendan			
Received:	Mar,18 2022 15:29:58			
Correspondence Type:	Web F	form		

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Correspondence ID:	83	Project: 103522 Document:	118739
Name:	Horto	n, Charles	
Received:	Mar,1	8 2022 16:00:37	
Correspondence Type:	Web F	orm	

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Correspondence ID:	84	Project: 103522 Document:	118739
Name:	Shorey	y, Jonathan	
Received:	Mar,18	3 2022 16:05:51	
Correspondence Type:	Web F	orm	

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Correspondence ID:	85	Project: 103522 Document:	118739	
Name:	Bratkovics, David			
Received:	Mar,18 2022 17:02:42			
Correspondence Type:	Web I	Form		

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Correspondence ID:	86	Project: 103522 Document:	118739	
Name:	Davidson, James			
Received:	Mar,18 2022 17:07:37			
Correspondence Type:	Web I	Form		

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Correspondence ID:	87	Project: 103522 Document:	118739	
Name:	Reppuhn, Thomas M			
Received:	Mar,18 2022 18:15:02			
Correspondence Type:	Web I	Form		

Correspondence: Way too much air traffic! The noise is very disturbing and continuous. Helicopters and planes continue to fly over the village. It's a good thing all of the 'stingers' were sent to the Ukraine

Correspondence ID:	88	Project: 103522 Document:	118739
Name:	Mitch	ell, Sheena	
Received:	Mar,1	8 2022 18:33:16	
Correspondence Type:	Web F	Form	

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Correspondence ID:	89	Project: 103522 Document:	118739	
Name:	,			
Received:	Mar,18 2022 19:04:17			
Correspondence Type:	Web I	Form		

Correspondence: I am strongly in favor of Alternative 2, prohibiting air tours within the ATMP planning area. Noisy air tours have plagued residents, visitors to the Park, and wildlife for decades. I've been told by Park staff that current operators regularly violate height limitations and thumb their noses at hikers and other people on the ground. (Actually, they are said to use ruder gestures than thumbing their noses.) I admit to personally having accompanied visiting friends on helicopter tours in the past and acknowledge that an aerial view of the magnificent landscape and eruptive activity is an indelible memory. However, it's not worth the disruption and stress in the lives of the people, birds, and other denizens of the land below.

Correspondence ID:	90	Project: 103522 Document:	118739	
Name:	sebranek, Sue			
Received:	Mar,18 2022 19:30:57			
Correspondence Type:	Web F	Form		

Correspondence: Aloha the national parks were set aside for the use of all people. They were to be a preserved natural setting that people could go to experience and rejuvenate themselves. I don't think loud over head copper noise is part of the natural setting of any place.

By letting the coopers use the park for there tourists flights we are defeating the original purpose of the park system

that the creates had in mine.

for this reason I don't think there should be any flights over the park. It will be bad enough that they can fly around the park borders but that is another issue.ahalo

Correspondence ID:	91	Project: 103522 Document:	118739	
Name:	Mayle, Carolyn			
Received:	Mar,18 2022 19:35:25			
Correspondence Type:	Web Form			

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Correspondence ID:	92	Project: 103522 Document:	118739	
Name:	Loro, Anthony			
Received:	Mar,18 2022 21:33:01			
Correspondence Type:	Web Form			

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Correspondence ID:	93	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,18 2022 21:38:31		
Correspondence Type:	Web F	Form	

Correspondence: Of the four alternatives, I like Alternative 2. We've visited HVNP four times in the past year. It is highly annoying to have helicopters over the park when you're hiking and enjoying this special place. Helicopters for research are acceptable, but I don't support it "just" for tourism. Helicopter tours cost a lot of money, and it's annoying to think that tourists with money to burn can ruin the national park experience that's available for all. If Alternatives 3 or 4 are chosen, I like the idea of incentivizing Quiet Technology, but I do not support letting them fly on a no-fly day or letting them fly more hours. If tours are to be allowed, I'd like to know there are certain days in the week that I can go and not be disturbed by noise from above.

Correspondence ID:	94	Project: 103522 Document:	118739
Name:	Rogers,	, Larry	
Received:	Mar,18	2022 22:27:22	
Correspondence Type:	Web Fo	orm	

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Correspondence ID:	95	Project: 103522 Document:	118739
Name:	Robso	n, Donald	
Received:	Mar,19	9 2022 06:25:40	
Correspondence Type:	Web F	orm	

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Correspondence ID:	96	Project: 103522 Document:	118739
Name:	Chelf,	Winston	
Received:	Mar,1	9 2022 06:34:11	
Correspondence Type:	Web F	orm	

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Correspondence ID:	97	Project: 103522 Document:	118739
Name:	Graue	r, Steve	
Received:	Mar,19 2022 06:48:38		
Correspondence Type:	Web Form		

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Correspondence ID:	98	Project: 103522 Document:	118739
Name:	straube, Jim		
Received:	Mar,19 2022 11:28:07		
Correspondence Type:	Web Form		

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Correspondence ID:	99	Project: 103522 Document:	118739
Name:	Dallwi	g, Barry	
Received:	Mar,19 2022 12:35:02		
Correspondence Type:	Web F	orm	

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Correspondence ID:	100         Project: 103522         Document:         118739	
Name:	Host, Kenneth	
Received:	Mar,19 2022 18:12:17	
Correspondence Type:	Web Form	

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Correspondence ID:	101 Project: 103522 Document: 118739		
Name:	Mayo Riley, Carol		
Received:	Mar,19 2022 18:21:33		
Correspondence Type:	Web Form		

Correspondence: Living next to the National Park has become increasing unpleasant due to the amount of helicopter traffic and the altitude at which they come over my house. I appreciate that visitors want to view the volcano, but I support a no-fly zone, option #2.

Correspondence ID:	102 Project: 103522 Document: 118739	
Name:	Buck, James D	
Received:	Mar,19 2022 21:07:31	
Correspondence Type:	Web Form	

Correspondence: It seems like there is always somebody flying over the park.

It's very irritating to be hiking through a beautiful rain forest and you can hardly hear the birds.

I don't think helicopters should be allowed to fly over the National Park.

Make them drive in and experience it on the ground, like the rest of us.

They cannot see how truly wonderful it is without seeing in from their car or trail.

Correspondence ID:	103 Project: 103522 Document: 118739
Name:	Bennett, Ricarda
Received:	Mar,20 2022
Correspondence Type:	Web Form

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Received:

## Mar,20 2022 08:54:30

Correspondence Type:

Web Form

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Correspondence ID:	
Name:	
Received:	

 105
 Project: 103522
 Document:
 118739

 Kline, Stacy
 Mar,20
 2022
 09:48:01

## Correspondence Type:

## Web Form

Correspondence: I am writing this comment to advocate for the ending of helicopter/airplane flights over all national parks in United States, especially Hawaii Volcanoes and Haleakala. People visit our beautiful and unique national parks for their wilderness quality, natural silence, and dark skies. Visitors do not want to listen to engine noise of any kind. It is inappropriate to fly over our national parks and it is inappropriate to allow motorized vehicles on unpaved trails.

Thank you for considering my comment.

Correspondence ID:	106	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,20 2022 11:03:26		
Correspondence Type:	Web Fo	orm	

Correspondence: The helicopters offer an accessible way to view volcanoes in a park which offers few options for disabled access to its unique features. When we visited there were no alternatives to hiking in -- although transit could easily have been provided, or wheelchairs available on rent, had the Park Service been willing to make that minor investment. The park already concentrates people and their detrimental effects. Forced away from the park, helicopter tours will have more islandwide impacts, inevitably including other more remote and pristine locations. It is unreasonable to expect to eliminate environmental disruption AND provide national park level public access. The alternatives posted go too far in restricting public access. There are separate reserve lands strictly for the enjoyment of local residents and preservation of wildlife, currently outside the normal helicopter routes, as well as great swathes of back country accessible only to the able bodied within the park. As a visitor, the helicopter presence was not as disruptive as the crowds on the ground jockeying to position themselves and their photography equipment without consideration of sharing.

Correspondence ID:	107	Project: 103522 Document:	118739
Name:	Campbell, Nancy		
Received:	Mar,20 2022 12:30:29		
Correspondence Type:	Web Form		

Correspondence: Aloha,

I would hate to see any increase in air traffic in any National Parks, but especially in Hawai'i Volcanoes National Park, the home of Tutu Pele. The cultural significance cannot be overstated, and to be honest any amount of air traffic is too much for such a sacred place. Cultural practitioners should be free to practice without the disturbance of air traffic.

Please do not allow any more air traffic, and ideally greatly reduce or eliminate it all together. Mahalo Nancy Campbell

Correspondence ID:	108	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,20 2022 13:30:33		
Correspondence Type:	Web Form		

Correspondence: I think it would be best to limit the flights to airspace over the park and ocean instead of them flying over residential areas. I hike in the park weekly and don't have any objections to helicopters.

Correspondence ID:	109	Project: 103522 Document:	118739
Name:	Gartner, Jeff		
Received:	Mar,2	0 2022 13:59:17	

Correspondence Type:

Web Form

Correspondence: I am in favor of your alternative option 3 because it limits the air traffic to specific routes and times. I live in an area near the park and currently there are no limits to helicopters flying directly over at any time of the day which is often noisy and distracting.

Correspondence ID:	110	Project: 103522 Document:	118739
Name:	Tatum, Russell		
Received:	Mar,20 2022 15:07:16		
Correspondence Type:	Web Form		

Correspondence: Air space over all off HVNP should restricted! NOTHING! If you want to experience the park it should be done in person.

Correspondence ID:	111 Project: 103522 Document: 118739
Name:	McBeath, Dale G
Received:	Mar,20 2022 17:44:56
Correspondence Type:	Web Form

Correspondence: Aloha,

Thank you for preparing the documents and FAQS for the VNP ATMP alternatives, I found them very helpful, clear, and beneficial to understanding both the park's, air-tour's, visitors, community, and cultural stakes in the process. I live in Volcano, teach at the local school, and volunteer at the park as a 'guardian' and trail guide for Kipukapuaulu. In the years I've lived here, the helicopter noise has increased and I've seen the affect on park visitors and our community. I'll only comment on the Alternatives today.

I appreciate that you added "Alternative #1" (No Change) both as a comparison, and to state that it is NOT an alternative being considered.

I also appreciate that you added "Alternative #2" (Greatest Protection) which shows us that having no air tours is actually an option. I was surprised by this, because after living both here and Kauai for years and seeing little or no significant response from the FAA and tour industries to community concerns, I didn't think that was even a possibility. Mahalo for that.

"Alternative #3" (Mixed Use) concentrates air traffic into two corridors, and the northern one has all that air traffic flying near or over the Volcano communities. This would be awful, as already the noise is considered bad by many of those who live here. In addition, most of that traffic would also impact the most visited parts of the park, including the visitor center and displays, Volcano House, Steam Vents, Kilauea crater and overlook, the lava tube, and many trails. The concentration of flights and associated noise would, in my opinion, could be much worse than it is now, especially for those of us who live and work in Volcano, and the students at our schools.

"Alternative #4" (mostly coastal) is well though out, in that it keeps most of the visitor active areas of the park off-limits, and keeps air-tours limited to coastal and pu'u o'o flow areas. Though it doesn't allow flyovers of the rest of the park, I worry that, especially since loitering and circling would be allowed, that the air-tour noise would still be an ever-present (except the single no-fly day), though lower level annoyance. I didn't see any data on whether the aircraft could be heard from the rest of the park, if at all.

I would like to see an Alternative similar to #2, but just using the coastal route. I'm not saying that's my favorite, but might be a compromise the Volcano community would better live with.

I look forward to being able to comment further as the process advances.

Mahalo,

Dale McBeath

Correspondence ID:	112	Project: 103522 Document:	118739
Name:	Diaz, Gabriele M		
Received:	Mar,21 2022		
Correspondence Type:	Web Form		

Correspondence: Our community is a small and quiet one and having the noise of tour helicopters constantly flying overhead is disturbing. I'm not in favor of this so called alternative plan. Most of the time tour companies get complacent and do whatever brings in more revenues and before we know helicopters fly all day over our houses. So my answer is no to air tours.

Correspondence ID:	113 Project: 103522 Document: 118739	
Name:	Diaz, Gabriele M	
Received:	Mar,21 2022	
Correspondence Type:	Web Form	

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Received:	Mar,21 2022	
Correspondence Type:	Web Form	

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Correspondence ID:	115 Project: 103522 Document: 118739
Name:	Lewis, Gary
Received:	Mar,21 2022 02:08:48
Correspondence Type:	Web Form

Correspondence: A visit to a National Park ANYWHERE should not be disturbed by the constant droning of helicopters on regular 'tourist runs'. A hike into a wilderness area should not include seeing passing helicopters every 30-60 mins.

As you can tell, I am completely against any tourist helicopters flying over HVNP.

Correspondence ID:	116	Project: 103522 Document:	118739
Name:	Barcla	y, Douglas	
Received:	Mar,21 2022 07:50:05		
Correspondence Type:	Web Form		

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plans for Hawaii Volcanoes National Park.

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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. Excluding the NPOAG from providing input on the ATMP process is in direction contradiction of FAA Order No. 1110.138A.

NPS does not have the necessary expertise to fundamentally redesign the airspace over these parks. The ATMPs proposed by NPS would relocate, constrict, and combine flight routes and would make substantial changes to flight altitudes. The current flight routes and altitudes have been in place for years and are well understood by industry. The changes proposed by ATMP have severe aviation safety implications that should have been deliberated in the NPOAG, as Congress intended in the National Parks Air Tour Management Act of 2000.

The proposals currently under consideration will force aircraft into potentially unsafe flight conditions. The NPS has proposed increasing the minimum flight altitude over Hawaii Volcanoes National Park from an allowed minimum 500 feet AGL to 1,500 feet AGL, which does not provide adequate safe options for navigation in typical weather patterns that exist in the park. Even more concerning is that the proposals have fixed narrow flight routes that do not take into account the areas constantly changing weather patterns.

I also have serious concerns with the economic impact these plans will have on helicopter air tour companies. The draft plans' flight allocation numbers do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change and NPS needs to respect that dynamic, as visitors alter their destinations according to those trends.

The NPS has failed to reach out to the operators to enquire what economic impacts might arise implementing a management plan that restricts overflights. Operators are already suffering economically post COVID-19, loosing over 80% of their businesses due to the shutdown of international travel. Further restrictions will cripple an already fragile industry trying to rebuild.

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Correspondence ID:	117	Project: 103522 Document:	118739
Name:	Finn, I	Robert	
Received:	Mar,2	1 2022 11:04:00	
Correspondence Type:	Web F	orm	

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Correspondence ID:	118         Project: 103522         Document:         118739		
Name:	Dagostino, Jason		
Received:	Mar,21 2022 11:14:36		
Correspondence Type:	Web Form		

Correspondence: Helicopters and small planes ruin the national park experience...more restrictions please... maybe only mid day flights on the weekends? Thank you for caring !!! Silence is an important part of the national park experience!!!! Aloha! Mahalo !

Correspondence ID:	119         Project: 103522         Document:         118739	
Name:	Chan, Bonnie	
Received:	Mar,21 2022 11:46:52	

Correspondence Type:

Web Form

Correspondence: (This is the same comment I submitted for the Haleakala National Park.) I've already submitted letters & amp; emails to all my federal legislators, asking them to PLEASE do something about the abundance of noisy helicopters/low-flying aircrafts. I've submitted Letters to the Editor from the Honolulu Star-Advertiser. I've also submitted my emails & amp; responses to/from the FAA. Included in all these letters/emails are my journals of days & amp; times when these helicopters/low-flying aircraft passed overhead. On one day, I counted FORTY times (this was not a rare occasion); I also included when the noise was especially LOUD. I know that this comment only pertains to the National Parks in Hawaii, but as I live in Aiea, I am asking for restrictions for ALL of Hawaii. The noise has gotten out of control.

Correspondence ID:	120	Project: 103522 Document:	118739
Name:	Harris	, Serena K	
Received:	Mar,2	1 2022 13:10:11	
Correspondence Type:	Web F	orm	

Correspondence: In order to preserve the ecosystem within the park, including endemic species found nowhere else on earth, I highly urge the NPS to impose strict restrictions on helicopter tourism within Hawaii's National Parks. The negative impact of helicopter tours outweighs any perceived benefits a profit-driven helicopter tour operation might bring. The disturbance to native fauna and visitors seeking a peaceful refuge is inherent in helicopter operation, and the only way to avoid these disturbances is to limit the range of helicopter use within and around the National Parks. These air tours are fundamentally inconsistent with the founding mission of the natural parks: "to preserve unimpaired the natural and cultural resources and values of the National Park System for the enjoyment, education, and inspiration of this and future generations." By including these air tours, the parks are no longer a place in nature to reconnect with the natural world outside the confines of our human-built environment, but just another exploited zone. I urge the NPS and FAA to enforce the strictest limits possible on these air tours and remove them from the parks. No person, corporation, or entity has the right to destroy the national parks, especially if the motivation is profit and tourism. The National Parks have been overrun with tourists since the start of the Covid-19 pandemic, and now is the time to take measures to ensure their viability for generations to come. I urge the NPS to select this option: maximum protection/no air tours under 5,000 feet above ground within a half mile of the parks.

Correspondence ID:	121	Project: 103522 Document:	118739
Name:	Carole	, Joanna	
Received:	Mar,21	2022 14:19:00	
Correspondence Type:	Web F	orm	

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Correspondence ID:	122	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,21 2022 16:35:05		
Correspondence Type:	Web F	form	

Correspondence: I prefer Alternative 2. While Alternative 3 seems like a nice compromise, I believe it will compress the tours into the 10-2 window, with it sounding like a war zone during that time, thus further damaging this important and sensitive natural resource area. Alternative 4 is slightly better than Alternative 1, but falls far short of protecting the habitat.

While I understand that this change may result in the loss of jobs for some in the tour industry, I believe these talented people will be able to pivot their highly technical skills and find other means of gainful employment. They may be able to ask the government for help in the interim (job training, unemployment compensation, etc.). A long time ago, we relied on helicopters to monitor traffic on the roads. With improved camera and other technology, we seldom employ helicopters for traffic purposes these days. Traffic pilots were able to find other employment, and I'm sure that will be the case for tourism pilots.

I also believe that with current and future technology, both people with disabilities and those without will be able to enjoy an AI-type of virtual tour, thus negating the need for helicopter tourism anywhere on the islands.

Evaluating tourism and its impact on HVNP must be a priority to protect this precious natural resource. Once damaged or destroyed, our natural resources will be nearly impossible and/or very expensive to restore. It is best to stop potentially destructive activities on HVNP when we now know that our actions may be causing harm.

While our national parks were created for us to enjoy, we must enjoy them responsibly and not cause harm or destruction. We must take responsibility for protecting them for future generations to enjoy.

Correspondence ID:	123 Project: 103522 Document: 118739
Name:	Mower, Michael
Received:	Mar,21 2022 16:40:55
Correspondence Type:	Web Form

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Correspondence ID:	124	Project: 103522 Document:	118739
Name:	Bryan, Timothy O		
Received:	Mar,21 2022 17:00:37		
Correspondence Type:	Web Form		
Correspondence: I strongly agree with and support Alternative 2.			

Correspondence ID:	125 Project: 103522 Document: 118739		
Name:	Kupchak, Patricia G		
Received:	Mar,21 2022 17:56:37		
Correspondence Type:	Web Form		

Correspondence: We have a house in Volcano on Maealani Pl above KMC. We have been spending a lot more time there recently because of covid. We support option 2 - no air tours. It is impossible to have a conversation at our house or on the trail in HVNP when a helicopter flies over and there are way too many flights. It certainly affects our enjoyment of our house and of the trails and overlooks in HVNP. I don't know what effects it has on the native birds, but I'm sure they are affected by the noise also.

There are many ways for tourists to enjoy the volcano - driving, walking and through the webcams on the USGS Volcano website. Air tours are not necessary for the tourists to enjoy the volcano and eliminating them will not keep tourists from coming to Hawaii or to HVNP.

Correspondence ID:	126 Project: 103522 Document: 118739
Name:	Riemer, Christopher
Received:	Mar,21 2022 18:38:59
Correspondence Type:	Web Form

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Correspondence ID:	127	Project: 103522 Document:	118739
Name:	Campl	oell, Trish A	
Received:	Mar,2	1 2022 18:42:18	
Correspondence Type:	Web F	orm	

Correspondence: To whom it may concern,

I absolutely do NOT support aircraft flying near, through, above our national parks. I support Senator Case, "no company or person has the right to destroy our national parks for any reason, including tourism, that we have many other opportunities for different people of different abilities to enjoy our national parks, and that air tours are fundamentally inconsistent with the reasons for which we established our national parks to start with."

Aircraft flying over our home on Tantalus has been incredibly disturbing, helicopters, small planes, and commercial flights.

Sincerely, Trish Campbell

Correspondence ID:	128 Project: 103522 Document: 118739
Name:	Pegg, Erik
Received:	Mar,22 2022 01:05:31
Correspondence Type:	Web Form

Correspondence: I am writing in support of Alternative 1 (no action) regarding the Air Tours Management Plan (ATMP) for Hawaii Volcanoes National Park.

As a resident of the island of Oahu, one of my fondest memories of visiting the "Big Island" of Hawaii was visiting the active volcano, Kilauea. When I was younger, around 10 or 12 years old, my father took us to see the volcano. At the time, there was a helicoper tour that actually had a helipad not far from the visitor center, and not stationed at the airport. This meant that less time was spent flying from the airport at Hilo up to the volcano and back. This in itself probably decreased the amount of noise pollution that so many residents are concerned about.

What really made the air tours of the volcano so special was that the helicoper could hover over an open lava flow. I distinctly remeber being able to feel the heat of the lava through the window of the helicopter. I was an experience I will never forget. More importantly, for some people, especially those who are not physically able to hike 20 miles to a crater or lava field, air tours are the only way for for these people to experience the park.

Correspondence ID:	129 Project: 103522 Document: 118739
Name:	Wilson, Michael
Received:	Mar,22 2022 10:20:25
Correspondence Type:	Web Form

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plans for Hawaii Volcanoes National Park.

I have serious concerns with the development process of the Air Tour Management Plans (ATMP) by the National Park Service (NPS) and the Federal Aviation Administration (FAA). NPS and the FAA have ignored 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. Excluding the NPOAG from providing input on the ATMP process is in direction contradiction of FAA Order No. 1110.138A.

NPS does not have the necessary expertise to fundamentally redesign the airspace over these parks. The ATMPs proposed by NPS would relocate, constrict, and combine flight routes and would make substantial changes to flight altitudes. The current flight routes and altitudes have been in place for years and are well understood by industry. The changes proposed by ATMP have severe aviation safety implications that should have been deliberated in the NPOAG, as Congress intended in the National Parks Air Tour Management Act of 2000.

The proposals currently under consideration will force aircraft into potentially unsafe flight conditions. The NPS has proposed increasing the minimum flight altitude over Hawaii Volcanoes National Park from an allowed minimum 500 feet AGL to 1,500 feet AGL, which does not provide adequate safe options for navigation in typical weather patterns that exist in the park. Even more concerning is that the proposals have fixed narrow flight routes that do not take into account the areas constantly changing weather patterns.

I also have serious concerns with the economic impact these plans will have on helicopter air tour companies. The draft plans' flight allocation numbers do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change and NPS needs to respect that dynamic, as visitors alter their destinations according to those trends.

The NPS has failed to reach out to the operators to enquire what economic impacts might arise implementing a management plan that restricts overflights. Operators are already suffering economically post COVID-19, loosing over 80% of their businesses due to the shutdown of international travel. Further restrictions will cripple an already fragile industry trying to rebuild.

In 2020, Hawaii Volcanoes National Park welcomed 590,000 visitors, a 57% decrease from 2019 when the park welcomed over 1,300,000 visitors. This year many National Parks saw their resources strained by the large number of visitors as the public began to travel again. Air tours are an important option for many visitors conducting a one-in-a-lifetime trip to see famous natural landmarks. Visitors taking advantage of air tours benefit by avoiding traffic, wait times, and walking trails that are inaccessible for the handicapped or elderly, while reducing congestion and demand on park infrastructure.

Like ground-based tours, air tours are a valid part of our visitor experience, providing a unique window from which we can share our cultural, historical and environmental sites with the world. Air tours require no ground-based infrastructure at the park, which allows visitors accessibility without the need for roads, trails, signs, bathrooms, garbage cans, or other services.

By further restricting an already limited number of allowable air tours, we are reducing opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance. Through carbon-offset efforts and

strict altitude requirements to control noise just to name a few efforts air-tour operators are working to ensure they are responsi

Correspondence ID:	130	Project: 103522 Document:	118739
Name:	Kudra	y, Luke	
Received:	Mar,2	2 2022 13:11:33	
Correspondence Type:	Web F	form	

Correspondence: I'm lucky to be a frequent Kama'aina visitor to our beautiful Haleakala and Hawaii Volcanoes parks and strongly support ALTERNATIVE 2 for flight traffic control.

There are so precious few quiet natural places left in the world, free of the sounds of construction, traffic, or aircraft. This seems like a tremendous opportunity to preserve the spaces we have for current and future generations. As endangered flora and fauna struggle with climate change and rising foot traffic post-COVID, ALTERNATIVE 2 is a step towards creating safe (sound) spaces where visitors can reach and beyond.

Thank you for presenting these alternatives and for allowing comments!

Correspondence ID:	131	Project: 103522 Document:	118739
Name:	Mittell	holtz, Rob S	
Received:	Mar,22	2 2022 17:02:51	
Correspondence Type:	Web F	orm	

Correspondence: The parks need to remain open to helicopter traffic. These tours allow the visitor to see a unique version of the beautiful parks in Hawaii and beyond. Closing the airspace above these areas rob people from seeing these parts and leaves the visitor to wonder why the park doesn't want people to visit. This is a very 'locals only' approach which is frowned upon by many visitors and very narrow minded.

Correspondence ID:	132	Project: 103522 Document:	118739
Name:	Wells,	Jared	
Received:	Mar,2	2 2022 17:07:40	
Correspondence Type:	Web F	orm	

Correspondence: After recently touring the island, I, Jared Wells, along with my wife, Haley Wells, are both deeply concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

Air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	133 Project: 103522 Document: 118739
Name:	McDiarmid, Scott D
Received:	Mar,22 2022 17:08:55
Correspondence Type:	Web Form

Correspondence: As an annual tourist to Hawaii I see the benefit the helicopter tour offer as a business and educational service. I support the current regulations and encourage NPS to not destroy this business. It's an excellent way with little to no impact on the park to enjoy Volcano National Park.

Correspondence ID:	134 Project: 103522 Document: 118739
Name:	Lujan, Ed
Received:	Mar,22 2022 17:09:34
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Received:

Mar,22 2022 17:09:36

Correspondence Type:

Web Form

Correspondence: I took a great ride around the island and am so happy I did. Learned of much and breathtaking landscape makes me appreciate nature and not to forget the memories I made.

I'd love to share this trip again with my mom and dad and my Future kids!!

Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

Air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Correspondence ID:	136 Project: 103522 Document: 118739
Name:	McDowell, Kelly
Received:	Mar,22 2022 17:10:08
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

Air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

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Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	137	Project: 103522 Document:	118739
Name:	Kust, I	Matthew W	
Received:	Mar,2	2 2022 17:10:37	
Correspondence Type:	Web F	Form	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	138         Project: 103522         Document:         118739
Name:	Hawks, Robert J
Received:	Mar,22 2022 17:12:57
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly

regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

Air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Correspondence ID:	139	Project: 103522 Document:	118739
Name:	Smith, Kate		
Received:	Mar,22 2022 17:17:13		
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly. I am elderly and cannot hike to areas I was fortunate enough to fly over. My helicopter tour was one of the highlights of my Life!!!

Air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	140	Project: 103522 Document:	118739
Name:	Martin	n, David	
Received:	Mar,22 2022 17:17:26		
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Helicopters are fun!

Correspondence ID:	141	Project: 103522 Document:	118739
Name:	Harris	, Lisa	
Received:	Mar,22 2022 17:23:08		
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

• Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

• Air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

• Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

• Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

• The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	142 Project: 103522 Document: 118739
Name:	Mossa, Marty
Received:	Mar,22 2022 17:24:33
Correspondence Type:	Web Form

Correspondence: My wife and I thoroughly enjoyed our two hour island tour. All along we felt safe, as well as secure knowing how professional and experienced our pilot was. This regulation proposed is another example of government overreach. Leave the good, hard working, decent businesses of Hawaii alone and allow them to provide the service for tourists.

Name:

Received:

Correspondence Type:

Web Form

Mar,22 2022 17:27:02

Correspondence: Hello,

I wanted to comment about the planned regulation.

I understand Hawaii air tours are already the most heavily regulated in the country.

One of the reasons I went to Hawai'i was to take an air tour to see the volcano. My visit, and those of the others in the helicopter, contributed to the economy of the island. The pilots were extremely careful not to violate volcano airspace and keep us safe. I felt completely comfortable with their skill and ability to follow regulations. They were highly professional.

I don't think further regulation will help HVNP. I think it will only hinder and take away the opportunity for tourists to enjoy one of our country's most amazing sites. It will harm the economy and spoil the enjoyment of the island for many tourists.

I ask you to please reconsider.

All the best, AMS

Correspondence ID:	144 Project: 103522 Document: 118739	
Name:	Kogut, Jeffrey E	
Received:	Mar,22 2022 17:28:34	
Correspondence Type:	Web Form	
Common an demose. Ili Livet become evene of the ATMD review		

Correspondence: Hi, I just became aware of the ATMP review.

We stayed in Hilo, HI this past December and took a helicopter trip over Volcanoes NP - really an amazing experience - and I wouldn't want others to miss out on this opportunity.

While staying in Hilo, traveling by car to Volcanoes NP, and being in the NP I don't ever recall hearing a helicopter that was farther away than maybe half a mile. They seemed relatively quiet when we did hear one, which to my recollection was only in Hilo when near the airport (and the planes were 10X noisier). They certainly weren't a nuisance or change the experience we had on the ground.

Correspondence ID:	145 Project: 103522 Document: 118739
Name:	Hydamacka, Deborah J
Received:	Mar,22 2022 17:30:40
Correspondence Type:	Web Form

Correspondence: While visiting the beautiful island of Hawaii, the highlight of our visit was the helicopter tour over the volcanoes and waterfalls. During the trip we were able to see the countryside and we all agreed it was absolutely incredible. My boyfriend and 2 grandkids, aged 11 and 15 were along for this tour. I have never seen my grandson so excited and the look on his face was worth the trip. Seeing the volcano up close has made him far more interested in the history of the islands and volcanoes in general. I would hate to see this opportunity be taken away from those who have not been able to see this.

The pilot was knowledgable and very aware of his surroundings, always looking to make sure we were safe and I felt totally safe. It was a very profound experience for all of us.

Correspondence ID:	146	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,22 2022 17:31:08		
Correspondence Type:	Web F	form	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	147	Project: 103522 Document:	118739
Name:	Walke	r, Laura	
Received:	Mar,22 2022 17:36:18		
Correspondence Type:	Web F	orm	

Correspondence: Air tours provide us the opportunity to enjoy our parks with little to no environmental footprint, versus tour buses or cars. We fear you may be listening to a few loud mouths and not taking into account the impact this will have on current businesses and jobs.

Air tours are a safe and enjoyable way for the elderly and mobility challenged to experience our parks and the wonders of Mother Nature. Please do not take this away from them.

Correspondence ID:	148	Project: 103522 Document:	118739
Name:	Kerns,	Lauren A	
Received:	Mar,22 2022 17:36:28		
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	149 Project: 103522 Document: 118739	
Name:	Wamack, David C	
Received:	Mar,22 2022 17:37:08	
Correspondence Type:	Web Form	

Correspondence: Please do not continue to add more and more restrictions to helicopter vendors trying to provide a service to those that may not be able to enjoy the lands of the NPS due to restrictions.

Keep the helicopter vendors honest and provide for both a visitation for those visiting on the ground while providing the same service for those that wish to visit by air.

Remember, the Islands are supported by visitor and the taxes they pay as tourists. Keep the local community in mind as you look to regulate the helicopter vendors.

Thanks

Correspondence ID:	150 Project: 103522 Document: 118739	
Name:	Osborne, Joann	
Received:	Mar,22 2022 17:37:34	
Correspondence Type:	Web Form	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	151 Project: 103522 Document: 118739
Name:	Katz, Marsha R
Received:	Mar,22 2022 17:43:32
Correspondence Type:	Web Form

Correspondence: Please don't implement the ATMP alternatives currently proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. I took a helicopter tour in Dec. 3021 in part because Hawaii air tours are already the most highly regulated in the country. As an older person who is no longer able to effectively hike into back country places, I would hate to see any new regulations reduce the accessibility of our public spaces for people like me.

Air tours allow my son and I to share Hawaii's cultural, historical and environmental sites in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the disabled as well as to older people.

On my flight I was so impressed by the skill of my female pilot, and her attention to safety, omitting a planned stop on the tour because of cloud cover/weather.

While I have been told that the NPS and the FAA have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000, it seems they are doing so without all the voices/stakeholders at the table. It is imperative to go beyond any token representation and meaningfully involve those whose livelihoods would be involved. I am confident that significantly involving them could help both NPS and FAA come up with strategies and solutions that could work for and be acceptable by all concerned. I urge you to consider Hawaii's air-tour operators and pilots in the HVNP ATMP, and not go forward with the current proposals without their involvement.

Thank you for this opportunity to comment. Sincerely, Marsha Katz Missoula, Montana

Correspondence ID:	152	Project: 103522 Document:	118739
Name:	Dolfi,	Eugene W	
Received:	Mar,2	2 2022 17:46:42	
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

Air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	153 Project: 103522 Document: 118739
Name:	Moore, K
Received:	Mar,22 2022 17:49:01
Correspondence Type:	Web Form

Correspondence: We were able to enjoy a helicopter ride like no other when we visited Hawai'i. Please keep helicopter tours operating safely with these in mind:

I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Name:	Kovac, Marc L
Received:	Mar,22 2022 17:51:02
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	155 Project: 103522 Document: 118739
Name:	Nichols, Ian
Received:	Mar,22 2022 17:51:19
Correspondence Type:	Web Form

Correspondence: I rode with Paradise Helicopters in Hawaii during one of my trips. I had a wonderful time and felt very safe. I understand there is a safety regulation being proposed that would limit their business. I'm all for public safety but would be sad to hear that Paradise Helicopters, and businesses alike, would no longer be able to operate.

Correspondence ID:	156 Project: 103522 Document: 118739
Name:	Vail, Evan G
Received:	Mar,22 2022 17:57:39
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

The helicopter tours are awesome, please don't force these people out of business for no good reason.

Correspondence ID:	157 Project: 103522 Document: 118739
Name:	, Jana
Received:	Mar,22 2022 17:58:37
Correspondence Type:	Web Form

Correspondence: Greetings,

I'm so glad you are looking at this issue to preserve the natural and cultural beauty of Hawaii and her people. I am in favor of more helicopter restrictions. I took a helicopter ride last year around Hawaii and felt it was quite invasive.

The pilot and company were exemplary and fastidious with safety and rule-following. I jus think the rules over national parks should be stricter. No cell towers on NPS land, either. Thank you.

Correspondence ID:	158 Project: 103522 Document: 118739
Name:	Guilloz, Nahua
Received:	Mar,22 2022 17:59:39
Correspondence Type:	Web Form

Correspondence: Aloha:

I am a Hawaii island resident and local air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly. Air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Mahalo!

Correspondence ID:	159 Project: 103522 Document: 118739
Name:	Soller, Jennifer
Received:	Mar,22 2022 18:02:02
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	160 Project: 103522 Document: 118739		
Name:	Solis, Tim G		
Received:	Mar,22 2022 18:04:38		
Correspondence Type:	Web Form		

Correspondence: Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly

Correspondence ID:	161	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,22	2 2022 18:06:32	
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	162	Project: 103522 Document:	118739
Name:	Murugesan, Premkumar		
Received:	Mar,22	2 2022 18:10:13	
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	163	Project: 103522 Document:	118739
Name:	Van,		
Received:	Mar,2	2 2022 18:11:07	
Correspondence Type:	Web I	Form	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	164	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,22	2 2022 18:13:11	
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices

represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	65 Project: 103522 Document: 118739	
Name:	1edvedeff, Kirk E	
Received:	1ar,22 2022 18:13:22	
Correspondence Type:	Veb Form	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	166         Project: 103522         Document:         118739
Name:	Davies, Janene K
Received:	Mar,22 2022 18:13:27
Correspondence Type:	Web Form

Correspondence: Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

Correspondence ID:	167 Project: 103522 Document: 118739
Name:	Sanchez, Francisco
Received:	Mar,22 2022 18:16:09
Correspondence Type:	Web Form

Correspondence: I hope that the decision to restrict airspace in these areas is not made by a group of politicians who, when their relatives go on vacation, are the ones who violate said restrictions.

Not following the air path we visited during our trip would be very selfish. Don't forget the jobs that you would be eliminating and perhaps tourism will lose interest in these trips. To execute this ordinance, I hope a conscientious and sufficiently convincing analysis is made because I do not see how the environment is affected by these tours. Instead of wasting time thinking about how to eliminate this tourist attraction, they should think about how to create new ones.

Correspondence ID:	168         Project: 103522         Document:         118739
Name:	Noaeill, Leah
Received:	Mar,22 2022 18:17:42
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	169 Project: 103522 Document: 118739
Name:	, James
Received:	Mar,22 2022 18:17:49
Correspondence Type:	Web Form

Correspondence: I would strongly encourage the NPS to continue allowing helicopters to fly over the parks of Hawaii. The helicopters are very safe, and I felt that the pilots did a great job of being low impact on the environment. The helicopters allow us to see the Parks especially on Big Island in a way that is not otherwise possible. And only by allowing people to see how incredible and amazing the our environment is can we help to encourage sustainability and protection of the environment.

Correspondence ID:	170	Project: 103522 Document:	118739
Name:	Chole	wa, Mike	
Received:	Mar,2	2 2022 18:18:04	

Correspondence Type:

Web Form

Correspondence: Let the helicopters fly over the park like they have been for years. It is safe and fun way to see nature.

Correspondence ID:	171 Project: 103522 Document: 118739
Name:	Richey, Jackie
Received:	Mar,22 2022 18:18:08
Correspondence Type:	Web Form

Correspondence: I believe that helicopters should continue to be allowed to operate in the manner in which they are doing so now. The operators take very specific safety measures while allowing visitors to experience the beauty and majesty of Hawaii from the air.

Correspondence ID:	172 Project: 103522 Document: 118739
Name:	Santos, Alex
Received:	Mar,22 2022 18:18:39
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	173	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,22	2022 18:22:26	
Correspondence Type:	Web Fo	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours

over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Correspondence ID:	174 Project: 103522 Document: 118739
Name:	Koenning, Diana
Received:	Mar,22 2022 18:23:06
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	175 Project: 103522 Document: 118739
Name:	Wang, Xinghan
Received:	Mar,22 2022 18:29:28
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	6 Project: 103522 Document	t: 118739
Name:	ng, Michael	
Received:	ar,22 2022 18:31:40	
Correspondence Type:	eb Form	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Correspondence ID:	177 Project: 103522 Document: 118739
Name:	Waters, Michael D
Received:	Mar,22 2022 18:32:42
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Correspondence ID:	178 Project: 103522 Document: 118739
Name:	Canada, Chris
Received:	Mar,22 2022 18:40:26
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly

regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Correspondence ID:	179 Project: 103522 Document: 118739
Name:	Hsu, Lee
Received:	Mar,22 2022 18:40:59
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Correspondence ID:	180	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,22	2 2022 18:44:26	
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	181         Project: 103522         Document:         118739	
Name:	MEADOWS, WIL	
Received:	Mar,22 2022 18:46:02	
Correspondence Type:	Web Form	

Correspondence: My wife and I did a two-hour helicopter tour in Oahu with Paradise Helicopters. The pilot was professional, clearly explained all safety protocols, and we had a great time. At no time did my wife or myself feel unsafe on the tour. I felt safer flying in the helicopter than driving around Oahu in a car. I also did not observe any adverse impact from the helicopter on the environment. I had no concerns whatsoever and would do the tour again without any modification in protocols.

Correspondence ID:	182	Project: 103522 Document:	118739
Name:	Lepon	e, Justin	
Received:	Mar,22	2 2022 18:46:46	
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Sincerely, Justin Lepone

Correspondence ID:	183         Project: 103522         Document:         118739
Name:	Reeder, Don L
Received:	Mar,22 2022 18:46:47
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly

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Correspondence ID:	184 Project: 103522 Document: 118739
Name:	Schmidt, Richard A
Received:	Mar,22 2022 18:52:27
Correspondence Type:	Web Form

Correspondence: am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	185	Project: 103522 Document:	118739
Name:	Cripps	s, Loren	
Received:	Mar,22	2 2022 19:01:10	
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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• The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	186 Project: 103522 Document: 118739
Name:	Rodriguez, Leopoldo V
Received:	Mar,22 2022 19:01:56
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP).

For many years, I have done Helicopter tours over the volcanoes in HI. The proposed changes would basically close down the Helicopter tour companies, which may be your objective, or it may simply be ignorance of what attracts tourists, which is the #1 source of income of the state of Hawaii.

Your proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. If Air tours disappear, it will limit a tourist's view of Hawaii's cultural, historical, and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

Air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

Pilots will be forced to narrow routes at high altitude, which is tourist deterrent, and also will make it difficult for them to fly. If they close down, hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

You should be more inclusive, the lack of diversity of voices represented by the current plan is concerning.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	187	Project: 103522 Document:	118739
Name:	Johnson, Hailey		
Received:	Mar,2	2 2022 19:17:27	
Correspondence Type:	Web F	form	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. The air tours provide a very informational experience for people coming to the island.

Correspondence ID:	188 Project: 103522 Document: 118739
Name:	Spradley, Sydney
Received:	Mar,22 2022 19:17:49
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Received:

Mar,22 2022 19:18:29

Correspondence Type:

Web Form

Correspondence: As a National Park Foundation Champions Society member, I have a strong interest in preserving, maintaining, and also experiencing our National Parks. A few years ago, I was fortunate enough to visit Hawaii and Hawai'i Volcanoes National Park, a dream of mine since I was a child. The island and the park are breathtaking and awe-inspriring. Though my family did not take a helicopter tour over the park, we did take a tour over the Kohala valleys. It was one of the most amazing things I have ever experienced. Providing the opportunity for people to view such an amazing and unique park from the air brings value and interest to Hawai'i Volcanoes National Park, and inspires awe and wonder and an appreciation for such a special place. Limits and restrictions on commercial flights should be in place to protect the park, while also providing the opportunity for people to have this experience. I think Alternatives 3 and 4 are the only reasonable options for the new Air Tour Management Plan.

Correspondence ID:	190         Project: 103522         Document:         118739
Name:	Coleman, Amanda T
Received:	Mar,22 2022 19:19:31
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	191	Project: 103522 Document:	118739
Name:	Carvalho	o, Jessica	
Received:	Mar,222	2022 19:31:13	
Correspondence Type:	Web For	rm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours

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Correspondence ID:	192         Project: 103522         Document:         118739
Name:	Butterworth, Mark A
Received:	Mar,22 2022 19:34:53
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Correspondence ID:	193	Project: 103522 Document:	118739	
Name:	Reno, Ladine D			
Received:	Mar,22 2022 19:36:39			
Correspondence Type:	Web F	orm		

Correspondence: My husband and I learned so much about the island, both by commentary and geographically through our helicopter tour. Please don't limit this great service.

Correspondence ID:	194	Project: 103522 Document:	118739	
Name:	,			
Received:	Mar,22 2022 19:37:35			
Correspondence Type:	Web F	orm		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	195	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,22	2 2022 19:41:55	
Correspondence Type:	Web F	orm	
Correspondence: Re: ATMP Alternatives for Dear Sirs:	Hawaii V	Volcanoes National Park	
In reviewing the Alternatives under consideration	on, only	Alternative 2 that proposes a con	nplete ban on commercial

air tour activity over the designated area, meets the criteria appropriate for the goals and mission of Volcanoes National Park for the following reasons:

1. Protection of critically endangered species of birds and other wildlife from the disruptive effects of noise pollution when nesting, foraging and mating. Thus adhering to the mission of the park to conserve and protect.

2. Preserves key elements of Hawaiian Culture which regard as sacred the lands under the influence of the Goddess Pele, with the commercialization of these lands for the benefit casual tourists an affront to ancient traditions.

3. Enhances the visitor experience in the back country through the enjoyment of pristine wilderness without the intrusion of noisy commercial air traffic. At the Visitor Center and summit area visitors can best experience the park on the ground, rather than at a distance in the air, through ranger-led nature walks and exhibits that serve to educate while providing an appreciation for the outdoors. Thus adhering to the mission of the park to educate.

The other Alternatives fail in several important ways:

1. Fees currently paid to the Park by air tour companies are totally inadequate at \$25, considering that entrance fees are substantially higher. Therefore, if any Special Limited Use Permits are ever to be considered under unusual or extreme circumstances, a fee of \$1,000 for each and every tour paid to Park the would be more suitable, and never more than one tour total per day.

2. The flight corridors proposed in the other alternatives are totally unacceptable in terms of air and noise pollution, not only for local residents who live nearby (along Highway 11, for example) but for native bird populations such as terns, white-tailed tropic birds, Nene etc. that have coastal and upland habitats and nesting sites in the path of air traffic.

Your consideration of these comments will be greatly appreciated.

Correspondence ID:	196	Project: 103522 Document:	118739	
Name:	Johns, Raymond			
Received:	Mar,22 2022 19:43:18			
Correspondence Type:	Web F	orm		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	197 Project: 103522 Document: 118739
Name:	Harr, Michelle
Received:	Mar,22 2022 19:43:35
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	198	Project: 103522 Document:	118739	
Name:	Perry, Ken			
Received:	Mar,22 2022 19:46:08			
Correspondence Type:	Web Form			

Correspondence: I am a frequent visitor to the Hawaiian islands. I have visited one island at least once a year for the last 15 years. Most of the time I end up visiting the Big Island for it's spectacular, rugged beauty and wonderful full time people who live on the island.

The island depends on people like me for its livelihood. As a visitor who loves Hawaii and wants to return as often as possible, I believe we need to develop responsible solutions that protect the environment and respect native people. But we must also allow visitors to enjoy the beauty Hawaii offers. There is a balance between all of these that can be achieved.

I have enjoyed several helicopter tours of the islands. It's not only a great way to get an overview of each island, it is safe and environmentally friendly. No roads or gasoline powered cars or tourbusses are needed to enjoy the islands when taking a helicopter ride. Visitors come in all shapes and sizes. Some are older or handicapped and can't hike or take long walks to enjoy the natural beauty of Hawaii's volcanos.

The current guidelines are too restrictive against helicopter operators. These are not large corporations. Most are small businesspeople who live on the island with their families and employees.

Please continue to allow helicopter operators to take visitors to view the volcanoes. This is a less disruptive way of visiting the park than other ways such as traveling by car or even over-used hiking paths and large tourbusses with their trash and need for restrooms and other facilities. It allows more types of visitors to enjoy Hawaii's beauty.

Don't shut out helicopter companies or destroy family-run businesses. These are good people - and several have owned their businesses for several generations.

We all appreciate and respect Hawaii. Please continue to let everyone continue to enjoy its beauty and majesty. Don't shut down the helicopters.

Mahalo

Ken Perry

Correspondence ID:	199	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,22	2 2022 19:53:13	
Correspondence Type:	Web F	orm	

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• Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

• The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	200 Project: 103522 Document: 118739
Name:	Ward, Tim P
Received:	Mar,22 2022 19:57:36
Correspondence Type:	Web Form

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Correspondence ID:	201	Project: 103522 Document:	118739
Name:	McCauley, Mathew		
Received:	Mar,22	2 2022 20:00:31	
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Correspondence ID:	202	Project: 103522 Document:	118739
Name:	Windon	n, Scott A	
Received:	Mar,222	2022 20:00:59	
Correspondence Type:	Web For	rm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Correspondence ID:	203	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,2	2 2022 20:02:50	
Correspondence Type:	Web F	form	

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Correspondence ID:	204	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,22 2022 20:05:39		
Correspondence Type:	Web I	Form	

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Correspondence ID:	205 Project: 103522 Document: 118739
Name:	Burriesci, Holly and Rob
Received:	Mar,22 2022 20:08:28
Correspondence Type:	Web Form

## Correspondence: Hello -

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Correspondence ID:	206 Project: 103522 Document: 118739	
Name:	Morris, Trey	
Received:	Mar,22 2022 20:12:43	
Correspondence Type:	Web Form	

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Correspondence ID:	207 Project: 103522 Document: 118739
Name:	Warr, James D
Received:	Mar,22 2022 20:14:00
Correspondence Type:	Web Form

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Correspondence ID:	208	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,2	2 2022 20:14:55	
Correspondence Type:	Web I	Form	

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Correspondence ID:	209	Project: 103522 Document:	118739
Name:	Goto, Kevin		
Received:	Mar,22 2022 20:19:44		
Correspondence Type:	Web F	form	

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Thank you.

Correspondence ID:	210	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,22 2022 20:20:49		
Correspondence Type:	Web F	form	

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Correspondence ID:	211	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,22 2022 20:21:33		
Correspondence Type:	Web F	Form	

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Correspondence ID:	212	Project: 103522 Document:	118739	
Name:	White	Whitehill, David		
Received:	Mar,22	2 2022 20:21:35		
Correspondence Type:	Web F	orm		

Correspondence: Suggested comments:

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Correspondence ID:	213	Project: 103522 Document:	118739
Name:	Tyrrell, Jim		
Received:	Mar,22 2022 20:22:18		
Correspondence Type:	Web Form		

Correspondence: Allowing helicopter pilots and the tour operators to safely fly over volcanos national park is import for aircraft and passenger safety including challenges with weather and volcanic activity. These operators are already heavily regulated, why do you need to impact safety with your proposed changes. What are you thinking???

Correspondence ID:	14 Project: 103522 Document: 118739		
Name:			
Received:	Mar,22 2022 20:24:50		
Correspondence Type:	7eb Form		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Correspondence ID:	215 Project: 103522 Document: 118739	
Name:	Bhullar, Mandeep	
Received:	Mar,22 2022 20:27:47	
Correspondence Type:	Web Form	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country.

Correspondence ID:	216	Project: 103522 Document:	118739
Name:	Marcoux, Jake		
Received:	Mar,22 2022 20:31:07		
Correspondence Type:	Web Form		
Correspondence: Awesome sERVIce super sa	afe can't	wait to get back!	
Correspondence ID:	217	Project: 103522 Document:	118739
Num	C Ial		

Name:	G., Jake
Received:	Mar,22 2022 20:31:08
Correspondence Type:	Web Form
1	TMP alternatives proposed by the National Park Service for

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Correspondence ID:	218 Project: 103522 Document: 118739
Name:	Paxton, James A
Received:	Mar,22 2022 20:32:22
Correspondence Type:	Web Form

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ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	219 Project: 103522 Document: 118739		
Name:	McIntyre, Maureen C		
Received:	Mar,22 2022 20:32:31		
Correspondence Type:	Web Form		

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Correspondence ID:	220 Project: 103522 Document: 118739
Name:	Lague, Mathieu
Received:	Mar,22 2022 20:33:19
Correspondence Type:	Web Form
a 1 m	

Correspondence: Hi,

As a regular foreign visitor, I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Thank you,

Mathieu Lague

Correspondence ID:	221	Project: 103522 Document:	118739
Name:	Blakemore, Kalena K		
Received:	Mar,22 2022 20:33:53		
Correspondence Type:	Web F	orm	

Correspondence: To whom it may concern,

As a Kanaka 'Ōiwi and resident of Volcano, Hawai'i for the last 24 years, I have strong opinions regarding the ATMP and our majestic 'āina. After reviewing the proposed alternatives it is with sad heart that I must agree to one of these choices and sacrifice our 'āina for commercial endeavors which violate our natural and cultural environment and resources.

In review of your Park Planning - ATMP website, Alternative #2 is the best choice in the interim until we can initiate Congress to intercede on behalf of Kanaka 'Ōiwi to create a No-Fly Zone over Hawai'i Volcanoes National Park.

In addition, I would like to request these inclusions to Alternative #2:

• A No-Fly day on Sundays

- Time of day 10am 2pm for non-QT Flights and 10am 4pm for QT Flights
- Interpretive Training Mandatory

• Restrictions for Particular Events - Mandatory 3-mile standoff distance with two months notice provided to operator.

Sincerely, Kalena K. Blakemore

Correspondence ID:	222	Project: 103522 Document:	118739
Name:	Wilson, Jenny		
Received:	Mar,22	2 2022 20:35:49	
Correspondence Type:	Web F	orm	

Correspondence: As a visitor to your beautiful islands and having taken a helicopter flight over the Volcanoes National Park, I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Kind regards

Jenny Wilson

Correspondence ID:	223	Project: 103522 Document:	118739
Name:	Bollhardt, Erik		
Received:	Mar,22 2022 20:39:10		
Correspondence Type:	Web F	orm	

Correspondence: Air tours are a safe way to experience the park. Why make pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make passengers and pilots LESS safe.

I VISIT Hawaii once per year and always take a helicopter trip. If you strip the safely, my family will not be able to fly anymore.

Correspondence ID:	224 Project: 103522 Document: 118739	
Name:	Osborne, Karine	
Received:	Mar,22 2022 20:39:25	
Correspondence Type:	Web Form	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

Air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	225 Project: 103522 Document: 118739	
Name:	Osborne, Karine	
Received:	Mar,22 2022 20:39:25	
Correspondence Type:	Web Form	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly

regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	226 Project: 103522 Document: 118739	
Name:	Abrahamson, Kim E	
Received:	Mar,22 2022 20:39:47	
Correspondence Type:	Web Form	

Correspondence: As a long-time Hawai'i hospitality professional, I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Mahalo,

Kim

Name:	Smith, Trent
Received:	Mar,22 2022 20:41:08
Correspondence Type:	Web Form

Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

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Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	228 Project: 103522 Document: 118739
Name:	McVety, Ronald
Received:	Mar,22 2022 20:41:19
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots.

Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

• Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.
Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP

ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	229 Project: 103522 Document: 118739		
Name:	Colon, William		
Received:	Mar,22 2022 20:41:44		
Correspondence Type:	Web Form		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

As a Former United States Marine Corps Helicopter Mechanic with hundreds of flight hours, only the pilot in command or aircrew should managed the safety of flight, period.

Correspondence ID:	230 Project: 103522 Document: 118739
Name:	Paramasivam, Sanjay
Received:	Mar,22 2022 20:42:02
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	231 Project: 103522 Document: 118739			
Name:	Rafferty, Anna			
Received:	Mar,22 2022 20:44:59			
Correspondence Type:	Web Form			

Air tours allow me and my family to enjoy Hawaii's cultural, historical and environmental sites in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

Air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

Air tours are a safe way to experience the park. My family actually participated in an Air Tour that combined linked in with a land tour. We would not have even visited the Parks if the Air portion did not provide the acceptability and experience it currently provides. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further. This would negatively impact the experience of touring your beautiful island.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	232 Project: 103522 Document: 118739			
Name:	Ricketts, James F			
Received:	Mar,22 2022 20:46:34			
Correspondence Type:	Web Form			

Correspondence: Air Tour Management Plan (ATMP) for Hawaii Volcanoes National Park.

I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

• Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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• Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	233 Project: 103522 Document: 118739			
Name:	Keller, Linda M			
Received:	Mar,22 2022 20:47:23			
Correspondence Type:	Web Form			

Correspondence: For many, an air visual by helicopter is a once in a lifetime epic event. The economic impact of further limiting their business would be detrimentally impactful for their business and also their supporting businesses. I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	234 Project: 103522 Document: 118739			
Name:	Edgeworth, Kristin			
Received:	Mar,22 2022 20:53:17			
Correspondence Type:	Web Form			

Correspondence: I have flown over the national park and it was an incredible experience that I wouldn't want other travellers to miss out on,

I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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• Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

• Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Name:	Sands, Robert
Received:	Mar,22 2022 20:57:27
Correspondence Type:	Web Form

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Correspondence ID:	236 Project: 103522 Document: 118739	
Name:	Petrow, Hayley	
Received:	Mar,22 2022 20:57:37	
Correspondence Type:	Web Form	

Correspondence: I strongly believe that these restrictive measures would take a toll on the tourism industry, jobs, National Park appreciation, small and local businesses. This was a highlight on out last two week long vacation, and would be saddened if we couldnt bring our kids on air tours next time we come. We spend a great deal of time on the island amd love exploring the parks and history of the island. I hope these restrictions will be reconsidered.

Correspondence ID:	237	Project: 103522 Document:	118739
Name:	Franklin, Amy		
Received:	Mar,22 2022 21:02:57		
Correspondence Type:	Web F	orm	

Correspondence: My experience with Paradise Helicopters on Oahu in July 2021 was by far the most captivating way to view the island! It was my first time on a helicopter tour and it opened my eyes to a new way to see the world! Please allow these very experienced and safe providers to continue to their livelihoods as they bring such enriching experiences to their customers (like my husband and I!) As a tourism-based business owner myself, I believe it is important to promote US tourism as much as possible because so many of us are small, often family-owned and operated businesses. Thank you for your kind consideration!! Mahalo and Aloha!!

Correspondence ID:	238	Project: 103522 Document:	118739	
Name:	Tillett, Charlie			
Received:	Mar,2	2 2022 21:03:08		
Correspondence Type:	Web F	Form		

Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

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Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	239	Project: 103522 Document:	118739	
Name:	Flores, David			
Received:	Mar,22	2 2022 21:05:25		
Correspondence Type:	Web F	orm		

Correspondence: We went on a family vacation in December 2017 and the helicopter tour from the air over volcanoes national park was one of the highlights of our Hawaii vacation. My family considered walking tours of volcanoes national park but i have osteoarthritis and cannot walk long distances because of the pain I have when walking. The only way persons with disabilities can see the actual volcano flows is from the guided helicopter tours.

I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit.

Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

If these restrictive measures are put into place at volcanoes national park many families who have family members with disabilities would not be able to see the wonderful volcanic structures and flows that are visible only from the helicopter tours.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	240	Project: 103522 Document:	118739
Name:	, MARK		
Received:	Mar,22 2022 21:05:46		
Correspondence Type:	Web Form		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Regards,

Mark

Correspondence ID:	241 Project: 103522 Document: 118739		
Name:	Connan, Roxanne		
Received:	Mar,22 2022 21:06:04		
Correspondence Type:	Web Form		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	242 Projec	ct: 103522 Document:	118739
Name:	Fleck, Brian J		
Received:	Mar,22 2022 2	21:07:43	
Correspondence Type:	Web Form		

Correspondence: To The National Park Service:

It was recently brought to my attention that the NPS has somehow been required or mandated to create an Air Tour Management Plan for Hawaii Volcanoes National Park. From my perception and experience, all this is going to do is impose unnecessary constraints on the businesses that provide an amazing tourist attraction! What exactly is the point of this plan anyways? Is it a group of people's idea that this will somehow protect this particular national park by imposing restrictions on the companies and pilots who offer a wonderful way to experience this park? What exactly is the danger this group of individuals sees in air tourism? I'm very concerned by government overreach at any level and this is no different! Is it the goal to simply shut down these businesses in the interest of "climate change" and eliminating everything that uses a fossil fuel? Please help me out here! Doesn't the state of Hawaii depend on tourism as one of the primary components of its economy? Isn't air travel and sight seeing far less intrusive and impactful on the environment by allowing many people to see and experience the cultural, historical and natural wonders of these beautiful islands without the need for additional infrastructure? Does the NPS realize that forcing pilots to fly in fixed and limited routes and from higher altitudes make it more challenging, potentially dangerous and expensive to operate? Do the people behind this ridiculous idea have any idea how many families and partner businesses would be directly effected if the air tourism businesses fail because of needless restrictions? I strongly and respectfully encourage anyone behind the creation and implementation of this "management plan" think again about the need for it at all!

Respectfully, Brian Fleck

Correspondence ID:	243 Project: 103522 Document: 118739
Name:	Ingweiller, Joe
Received:	Mar,22 2022 21:08:14
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

• Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

• Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

• Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	244	Project: 103522 Document:	118739
Name:	Heim, Sue		
Received:	Mar,22 2022 21:11:45		
Correspondence Type:	Web F	orm	

-Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

-Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

-Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe.

The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	245	Project: 103522 Document:	118739
Name:	Waning, Paul		
Received:	Mar,22 2022 21:15:58		
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Received:

## Mar,22 2022 21:17:34

Correspondence Type:

Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP).

My concerns fall into the following categories:

1. Safety. I would think the last thing regulators would want is to compromise safety in any way. My experience flying with several tour operators was that they were extremely concerned with and prioritized safety highly. Respecting their safety concerns with new regulations (being restricted to higher altitudes for example) would seem to be paramount for an organization with a duty to prioritize safety.

2. Economy. Obviously, the tour operators and a number of people connected to their businesses depend on tours for their livelihood. Finding a way to keep and enhance their economic opportunity seems like a win all around.

3. Opportunity. As I mentioned, have used several tour operators over the years and experienced Hawaii and the volcano area by air myself and with my children. It is one of our favorite activities on the island, and I think it would be tragic to reduce that opportunity in the future.

Overly restrictive measures could impact the availability of air tours over the park or introduce potentially unsafe policies for pilots/passengers. Hawaii air tours are already the most highly regulated in the country, so adjusting policies should only be done with careful consideration and in cooperation with air tour operators.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	247 Project: 103522 Document: 118739
Name:	Asselmeier, Larry
Received:	Mar,22 2022 21:19:51
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	248	Project: 103522 Document:	118739
Name:	Guillo	z, Jeff	
Received:	Mar,22	2 2022 21:24:41	
Correspondence Type:	Web F	orm	

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Mahalo, Jeff Guilloz

Correspondence ID:	249 Project: 103522 Document: 118739
Name:	Wooding, Christine M
Received:	Mar,22 2022 21:26:11
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). These restrictive measures could eliminate air tours over the park or introduce potentially unsafe policies. Hawaii air tours are already the most highly regulated in the country. These proposals target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours restricts accessibility for the handicapped and elderly. Please note: higher-flying aircraft spread their sound signature further.

Thank you for this opportunity to comment. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	250	Project: 103522 Document:	118739
Name:	Sutherland, Shannon		
Received:	Mar,22 2022 21:26:43		
Correspondence Type:	Web F	form	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Shannon Sutherland

Correspondence ID:	251 Project: 103522 Document: 118739
Name:	Moak, Sabrina A
Received:	Mar,22 2022 21:27:41
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Correspondence ID:	252	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,2	2 2022 21:27:59	
Correspondence Type:	Web F	form	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	253 Project: 103522 Document: 118739
Name:	Kerridge, Pennie L
Received:	Mar,22 2022 21:28:02
Correspondence Type:	Web Form

Correspondence: We personally experienced a flight seeing trip with Paradise Helicopters and we're very pleased with their attention to detail, safety instructions and professionalism of the staff in all aspects of the flight. We would love to be able to bring our grandkids back to experience this with us, when they are old enough.

Correspondence ID:	254 Project: 103522 Document: 118739	
Name:	Kouwe, Robert N	
Received:	Mar,22 2022 21:28:57	
Correspondence Type:	Web Form	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Correspondence ID:	255 Project: 103522 Document: 118739	
Name:	Roberts, Robert	
Received:	Mar,22 2022 21:32:48	
Correspondence Type:	Web Form	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

Air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Correspondence ID:	256 Project: 103522 Document: 118739		
Name:	Kho-Spangler, Angel		
Received:	Mar,22 2022 21:35:07		
Correspondence Type:	Web Form		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

Correspondence ID:	257 Project: 103522 Document: 118739		
Name:	Graham, Doug		
Received:	Mar,22 2022 21:43:26		
Correspondence Type:	Web Form		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Received:

Mar,22 2022 21:44:23

Correspondence Type:

Web Form

Correspondence: Please allow the helicopter pilots the flexability to continue to select altitude, and area they fly in. Existing regulations and restrictions are adequate.

Correspondence ID:	259	Project: 103522 Document:	118739	
Name:	,			
Received:	Mar,22 2022 21:45:01			
Correspondence Type:	Web Form			

Correspondence: Air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

Correspondence ID:	260	Project: 103522 Document:	118739
Name:	Woods, Elaine M		
Received:	Mar,22 2022 21:47:34		
Correspondence Type:	Web Form		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

I want you to know that when I traveled to Hawaii and took a helicopter ride over the volcanic area, it was the highlight of my vacation. Please do not take this wonderful experience away from the public and the tourism industry!

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Sincerely,

Elaine Woods

Correspondence ID:	261 Project: 103522 Document: 118739
Name:	Baumann, Wendy J
Received:	Mar,22 2022 21:47:43
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours

over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

I personally have had the pleasure in partaking of a helicopter tour which included the Jurassic movie terrain, and it would be upsetting to know that I would not be able to enjoy this experience again if more regulation is enforced.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	262	Project: 103522 Document:	118739
Name:	Schirr	ipa, Douglas P	
Received:	Mar,22 2022 21:53:59		
Correspondence Type:	Web F	orm	

Correspondence: I have heard of restrictions ATMP are proposing for HVNP and I was really taken aback. I though that during our visit my wife and I were really looking forward to seeing a birds eye view of the lovely historic and cultural areas of Hawaii as well as the volcanoes we only read about..

We were lucky enough to come across Paradise Helicopters and booked a flight with them. It was an amazing experience, which gave us a quick overview of the island, its volcanic history and the layout of the island, which we would not have been able to see on our own or by ground vehicle.

We still talk about the experience to our friends who are hoping for the lifting of covid restrictions to go to Hawaii too.

Our pictures are often looked at and admired and I am sure will result in many visitors to Hawaii in the future, benefiting not just Paradise helicopters but the region in general with hotels, restaurants, other operators and the like, all able to receive business from the visitors.

I found Paradise helicopter very professional and in no way affected the area by flying over, rather than land vehicles that drive over the land.

I certainly believe making helicopters change their pattern or fly higher would take away the the joy and pleasure so many people from around the world would experience.

it also would have a big impact on the viability of some of the operators and thus an affect on the economy of the island.

I suggest you all hope on a flight and witness first hand, the safe, non environmental affect, these helicopters have and the pleasure it gives your visitors.

Thanks for the opportunity to comment but was surprised at the shortness of time you are giving for comment. Please consider carefully as your decision could affect some many people and their lively hoods with no benefits long term.

Douglas Schirripa Adelaide Australia

Correspondence ID:	263	Project: 103522 Document:	118739
Name:	Pulsche	er, Melanie S	
Received:	Mar,22 2022 21:55:35		
Correspondence Type:	Web Fo	orm	

Correspondence: Aloha! I have taken a number of Helicopter tours on Big Island and I am personally aware that they take seriously their impact. Flights are cancelled when any danger at all is suspected including smoke, vog, wind, etc. etc... The pilots have always been respectful of areas they fly and the safety of everyone. I recently spent over a month on the island and in my personal experience I was only distracted once by a loud helicopter this entire trip (it was at my rare visit to the beach). During my 3 days in the Volcano area I dont even recall being disturbed by or even seeing a helicopter. When I have been over the HVNP in a helicopter, it's typically for a very short period of time- no long lingering and I don't recall aircraft waiting in line behind us to follow. It seems to me that regulations should be left as is. Especially if limiting its' use could cause them to go out of business completely. Therefore, I would have to express concerns about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures could effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. I wouldn't doubt that Hawaii air tours are already the most highly regulated in the country as Ive seen how safe they are and cautious. They've cancelled on more than one occassion with safety being their most primary concern. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses could be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated. Thank you for your time!

Correspondence ID:	264	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,22 2022 22:00:48		
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Helicopter air tours must necessarily allow judgement by the pilots. Pilots and operators should be given guidelines but they must be allowed to deviate for the sake of safety and effective touring as well. Rigid hard rules reduce safety and the tour experience by not allowing the pilots to use their judgement. They have a vested interest in both safety and effective tourism. Train them and trust them.

These tours safely and efficiently enhance the experience of thousands of visitors. These visitors have as much ownership of this public space as the people that whine about and dislike/discredit the helicopter tours. Do not take away the rightful access of the majority of visitors.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the

environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	265	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,22 2022 22:00:50		
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Helicopter air tours must necessarily allow judgement by the pilots. Pilots and operators should be given guidelines but they must be allowed to deviate for the sake of safety and effective touring as well. Rigid hard rules reduce safety and the tour experience by not allowing the pilots to use their judgement. They have a vested interest in both safety and effective tourism. Train them and trust them.

These tours safely and efficiently enhance the experience of thousands of visitors. These visitors have as much ownership of this public space as the people that whine about and dislike/discredit the helicopter tours. Do not take away the rightful access of the majority of visitors.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	266         Project: 103522         Document:         118739		
Name:	Hanson, Aaron		
Received:	Mar,22 2022 22:03:34		
Correspondence Type:	Web Form		

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plans for Hawaii Volcanoes National Park.

I have serious concerns with the development process of the Air Tour Management Plans (ATMP) by the National Park Service (NPS) and the Federal Aviation Administration (FAA). NPS and the FAA have ignored 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. Excluding the NPOAG from providing input on the ATMP process is in direction contradiction of FAA Order No. 1110.138A.

NPS does not have the necessary expertise to fundamentally redesign the airspace over these parks. The ATMPs proposed by NPS would relocate, constrict, and combine flight routes and would make substantial changes to flight altitudes. The current flight routes and altitudes have been in place for years and are well understood by industry. The changes proposed by ATMP have severe aviation safety implications that should have been deliberated in the NPOAG, as Congress intended in the National Parks Air Tour Management Act of 2000.

The proposals currently under consideration will force aircraft into potentially unsafe flight conditions. The NPS has proposed increasing the minimum flight altitude over Hawaii Volcanoes National Park from an allowed minimum 500 feet AGL to 1,500 feet AGL, which does not provide adequate safe options for navigation in typical weather patterns that exist in the park. Even more concerning is that the proposals have fixed narrow flight routes that do not take into account the areas constantly changing weather patterns.

I also have serious concerns with the economic impact these plans will have on helicopter air tour companies. The draft plans' flight allocation numbers do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change and NPS needs to respect that dynamic, as visitors alter their destinations according to those trends.

The NPS has failed to reach out to the operators to enquire what economic impacts might arise implementing a management plan that restricts overflights. Operators are already suffering economically post COVID-19, loosing over 80% of their businesses due to the shutdown of international travel. Further restrictions will cripple an already fragile industry trying to rebuild.

In 2020, Hawaii Volcanoes National Park welcomed 590,000 visitors, a 57% decrease from 2019 when the park welcomed over 1,300,000 visitors. This year many National Parks saw their resources strained by the large number of visitors as the public began to travel again. Air tours are an important option for many visitors conducting a one-in-a-lifetime trip to see famous natural landmarks. Visitors taking advantage of air tours benefit by avoiding traffic, wait times, and walking trails that are inaccessible for the handicapped or elderly, while reducing congestion and demand on park infrastructure.

Like ground-based tours, air tours are a valid part of our visitor experience, providing a unique window from which we can share our cultural, historical and environmental sites with the world. Air tours require no ground-based infrastructure at the park, which allows visitors accessibility without the need for roads, trails, signs, bathrooms, garbage cans, or other services.

By further restricting an already limited number of allowable air tours, we are reducing opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance. Through carbon-offset efforts and strict altitude requirements to control noise just to name a few efforts air-tour operators are working to ensure they are responsi

Correspondence ID:	267 Project: 103522 Document: 118739		
Name:	Edney, Judith G		
Received:	Mar,22 2022 22:04:02		
Correspondence Type:	Web Form		

Correspondence: My husband and I have visited Hawaii Volcanoes National Park, a trip that we both enjoyed immensely. We have operated adventure based tourism and at no time did we feel unsafe, the tours were operated to a very high standard.

I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

• Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

• Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or

restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. • Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	268	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,22 2022 22:05:07		
Correspondence Type:	Web Fo	orm	

Correspondence: I have enjoyed an amazing helicopter tour a few years ago at Hawaii. That was one of my most beautiful memories. I heard about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP), and I have some concerns. Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	269	Project: 103522 Document:	118739
Name:	White	hill, David	
Received:	Mar,2	2 2022 22:06:02	
Correspondence Type:	Web F	orm	

Correspondence: When will we stop losing public access by our County, State, and now possibly Federal Parks? Helicopter viewing and sharing in person with family, friends, and visitors of one of the Wonders of the World whether it was experienced by land, by sea or air is surely on everyone's bucket list. Normally I would support the National Parks Service, but not on taking away the experience of flying over the Volcano in a Helicopter. It is safer than driving home at night. Please let the tour helicopters keep flying over the Volcano and the rest of the Big Island for that once-in-a-lifetime experience. Otherwise, bucket lists and adventurist experiences will again be diminished by politics to a mere indoor viewing on the computer screen? This is definitely not the National Parks Service I know and have supported. Don't make it another sad sad day for my children for your children and your children's children :(

Life is too short to not experience,

Thank you for your time and consideration,

Aloha,

David

David Whitehill P.O. Box 1138 Kailua-Kona, HI. 96745

Correspondence ID:	270 Project: 103522 Document: 118739
Name:	Olson, Sarah A
Received:	Mar,22 2022 22:09:46
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Correspondence ID:	271 Project: 103522 Document: 118739
Name:	Halverson, Jill
Received:	Mar,22 2022 22:13:32
Correspondence Type:	Web Form

Correspondence: We try to visit beautiful Hawaii Island to see family but also to your. I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. Safety is important, but not extreme rules that make it impossible for free enterprise: a constitutional right to Americans. Be sure decisions are not made that allow a company to monopolize your tourism. It's wrong and difficult to overcome and correct later.

Thank you for reading and considering my concerns

Correspondence ID:	272 Project: 103522 Document: 118739		
Name:	Worboys, Josephine s		
Received:	Mar,22 2022 22:14:33		
Correspondence Type:	Web Form		

Correspondence: To NPS,

I have just been made aware of the ATMP alternatives proposed for Hawaii Volcanoes National Park.

I am extremely concerned about the restrictive measures that would greatly impact & amp; eliminate air tours over the park.

We have had many trips over the volcanoes in Hawaii and these trips have been the best highlights of our family, the best experiences ever.

Our family would be greatly saddened and upset if we could not return and do these tours again because of the new proposed restrictions.

1. Air tours leave no environmental footprint or damage to the land as do ground vehicles. Our experience with the company we use (Paradise Helicopters) has been one of utmost care for your land and how they manage their operations. If it wasn't for them I would not have been able to see all that we did due to my limited mobility.

2. If these restrictions go ahead we would not get to see the beautiful volcano park that we have come to love, honor and respect.

3. Air tours are an extremely safe way to experience the park and due to my limited mobility and age I would be extremely disappointed if I could not again enjoy the air volcano tours that we enjoy each year when we come to Hawaii.

4. The pilots are very experienced and need the flexibility to make safe decisions and choose their routes and altitudes.

Thank you for the opportunity to comment. I hope you do consider Hawaii's air tour operators in the HVNP ATMP. THE ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be accepted.

Please remember all the families and the elderly, those who have enjoyed and continue to enjoy these great adventures in the air. It is our highlight of us coming to Hawaii each year, please don't spoil that for us. Trust your Air tours as they really do fly safely and put the HVNP first in caring for the environment. Kindest regards Josephine Worboys

Correspondence ID:	273	Project: 103522 Document:	118739
Name:	Long, Garry A		
Received:	Mar,22 2022 22:42:28		
Correspondence Type:	Web F	orm	

Correspondence: Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Correspondence ID:	274	Project: 103522 Document:	118739
Name:	Stipis, Nickolas		
Received:	Mar,22 2022 23:03:09		
Correspondence Type:	Web F	form	

Correspondence: We have National Parks to Showcase nature's beauty and best. It is important that as visitors we leave a very small footprint. Helicopters leave no footprint as they don't land. Therefore there is no physical disturbance from the many thousands that use helicopters to get a bird's eye view.

Helicopter operations are already regulated and do not need yo be more restrict or should they impinge on the professional judgment of the pilots and tour operators. There can be no safer judgement than the pilot he/ she have a vested interest in SAFETY.

WE enjoyed our volcano tour and were in good hands.

Don't stuff it up with over regulation. Let the pilot use his professional judgement. He knows best when he is flying

Correspondence ID:	275	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,2	2 2022 23:04:15	
Correspondence Type:	Web F	form	

Correspondence: I visited Hawaii several years ago and enjoyed my tour with Paradise Helicopters. They sent me notification that regulations may be put into place that are unsafe or too regulatory. The helicopter pilots at Paradise know what they are doing and need to be allowed to fly safely.

I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	276 Project: 103522 Document: 118739
Name:	Schwartz, Mike D
Received:	Mar,22 2022 23:05:45
Correspondence Type:	Web Form

Correspondence: Don't limit our access to experience the volcanos and public lands over HI. Further restrictions will limit my families ability to enjoy this part my country.

Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

Air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Mike Schwartz

Correspondence ID:	277 Project: 103522 Document: 118739	
Name:	Wong, Michael A	
Received:	Mar,22 2022 23:12:36	
Correspondence Type:	Web Form	

Correspondence: We flew on a volcano tour with Paradise Helicopters and it was a very enjoyable trip. The pilot was informative and courteous. The on ground preparation was precise and direct with their explanations.

All in all, we felt very safe and had a wonderful time. It was a great way to see the volcano and the surrounding area.

Correspondence ID:	278 Project: 103522 Document: 118739		
Name:	, Terri		
Received:	Mar,22 2022 23:27:22		
Correspondence Type:	Web Form		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

- Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

- Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

- Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	279	Project: 103522 Document:	118739
Name:	Willemse, Gerard P		
Received:	Mar,23 2022		
Correspondence Type:	Web F	form	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Web Form

Correspondence: First, air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

And also, air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

Correspondence ID:	281	Project: 103522 Document:	118739
Name:	Marco	oni, Katy M	
Received:	Mar,2	3 2022	
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Sincerely, Katy and Bob Marconi

Correspondence ID:	282         Project: 103522         Document:         118739		
Name:	Anizan, Cyrille		
Received:	Mar,23 2022 01:16:00		
Correspondence Type:	Web Form		

Correspondence: Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly

Correspondence ID:	283 Project: 103522 Document: 118739		
Name:	Draper, Brad		
Received:	Mar,23 2022 01:17:07		
Correspondence Type:	Web Form		

Correspondence: To whom it may concern,

I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Sincerely

Brad Draper

Correspondence ID:	284 Project: 103522 Document: 118739	
Name:	McAllister, Brett W	
Received:	Mar,23 2022 01:44:03	
Correspondence Type:	Web Form	

Correspondence: I agree with the comments below. Locking up or restricting access to National Parks is NOT the way to go.

The public must be able to see and access all areas in National Parks (within reason) to be able to appreciate and then protect it for the future.

I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	285	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,23	2022 01:52:56	
Correspondence Type:	Web Fo	orm	

Correspondence: Usually I side with NPS on rules regarding visitation to the park but in this case, I think implementing the Air Tour Management Plan is a mistake. Air tour operators are well aware that flying in the vicinity of an active volcano is already dangerous for not only themselves but their passengers as well. NPS needs to realize that an air tour operator that is operated in an unsafe or irresponsible fashion, won't be in business long. Either OSHA, FAA or some other governmental agency will shut them down. The National Parks were created for

the Public to see these areas for not only this generation but future. Being too restrictive will make it harder for NPS to justify additional funding to maintain and continue the parks. Recently I visited Haleakala National Park and was disappointed to find both visitor centers and the observation pavilion at the summit closed down. An automated pay station was at the entrance to the park with a long line of cars. If this is what NPS sees as the future for running parks, I hope they realize fewer employees will be needed. National Parks were not intended to be available to a privileged few but for all. My father spent 40 years working for the National Park Service and spent every day of his career in maintaining the delicate balance between visitors and keeping the parks in pristine condition. You can't appreciate what you can't see. Finally, Hawaii is heavily dependent on tourism as a source of income and the recent COVID-19 shutdowns made that evident. Make access to the volcanoes more restrictive and NPS will be responsible for the loss of many tourism related jobs in in Hawaii and I doubt that will sit well with anyone. So if ATMP is implemented, expect negative consequences to follow.

Correspondence ID:	286	Project: 103522 Document:	118739
Name:	Harper	, Ross	
Received:	Mar,23	2022 01:55:59	
Correspondence Type:	Web Fo	orm	

Correspondence: A couple of years ago, my wife & amp; I visited Hawaii. One of the highlights was a helicopter flight around the island of Hawaii, including the then erupting Kilauea volcano, with Pardadise helicopters. I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP.

Yours Sincerely, Ross Harper Australia

Correspondence ID:	287 Project: 103522 Document: 118739		
Name:	Pabst, Carsten		
Received:	Mar,23 2022 02:23:06		
Correspondence Type:	Web Form		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Correspondence ID:	288         Project: 103522         Document:         118739		
Name:	Vanasia, Katia		
Received:	Mar,23 2022 02:34:05		
Correspondence Type:	Web Form		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

• Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.
Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	289	Project: 103522 Document:	118739
Name:	van der Wel, Paul J		
Received:	Mar,23 2022 02:53:09		
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support. Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Name:	Rogie, Marie
Received:	Mar,23 2022 03:10:54
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	291	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,23 2022 03:16:21		
Correspondence Type:	Web F	form	

Correspondence: I think you should restrict access to the most desirable places on the island. I mean it's not like the prime income comes from tourism. Make it as undesirable to tourists as your obvious attitudes to them are overtly shared. I have been to Hawaii many times and hope to never return as most the consider themselves "native" are about as racist as you get.

Correspondence ID:	292	Project: 103522 Document:	118739
Name:	Brown, Jason		
Received:	Mar,23 2022 03:18:51		
Correspondence Type:	Web Form		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	293 Project: 103522 Document: 118739		
Name:	Subramanian, Subbiah		
Received:	Mar,23 2022 03:19:33		
Correspondence Type:	Web Form		

Correspondence: Paradise helicopter tour was safe, affordable and very respectful of the environment. It have us an opportunity to take a closer look at amazing Hawaii.

I hope it stays that way for future visitors.

Correspondence ID:	294	Project: 103522 Document:	118739
Name:	Heind	el, Robert L	
Received:	Mar,23	3 2022 03:25:38	
Correspondence Type:	Web Form		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	295	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,23 2022 03:30:22		
Correspondence Type:	Web Form		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

Air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	296	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,23 2022 03:32:37		
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	297	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,23	2022 03:32:37	

Correspondence Type:

## Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	298 P	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,23 2022 03:32:38		
Correspondence Type:	Web Form		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices

represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	299	Project: 103522 Document:	118739
Name:	Husse	y, Jerry D	
Received:	Mar,23 2022 03:34:01		
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	300	Project: 103522 Document:	118739
Name:	Corde	ro Castro, Antonio	
Received:	Mar,23 2022 03:37:02		
Correspondence Type:	Web Form		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	301	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,23 2022 03:59:26		
Correspondence Type:	Web F	form	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

Air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	302	Project: 103522 Document:	118739
Name:	Hopper	r, Debra	
Received:	Mar,23	2022 04:19:04	
Correspondence Type:	Web Form		

Correspondence: When we flew over the volcano it was erupting. It was a wonderful trip. We felt safe and the staff were great. Not everyone is able to walk for miles so this is a good way to see areas that you cannot access by walking. We had a brilliant time and it would be ashame if people can't experience what we did.

Name:	Ángulo, Ray
Received:	Mar,23 2022 04:31:52
Correspondence Type:	Web Form

Correspondence: Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Also, air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

These two paragraphs apply not only to my family but many others.

\*My sister is handicapped and if not by helicopter then how?

\* The footprints and trash left by many careless tourists would be detrimental to the ecology.

\*I just retired as an airline pilot having flown over your land many times, without helicopters my wife would never have seen your beautiful land as I have, and at their operational altitude I was further impressed.

\*And as a pilot I know that restricted air corridors are dangerous, the saturation will lead to additional sanctions placed on helicopter operators let alone the high potential for a mid air collision.

Correspondence ID:	4 Project: 103522 Doc	ument: 118739
Name:	owd, Sabrina	
Received:	ar,23 2022 04:38:43	
Correspondence Type:	eb Form	

Correspondence: Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

The sights my family saw were a one in a lifetime and made each and everyone of us want to help protect and save this earth. Not often do you get to see the earth as it is being born. Ever should have the opportunity to see such an amazing thing. We thank Paradise Helicopters for the experience we had.

Correspondence ID:	305         Project: 103522         Document:         118739
Name:	Sexton, David G
Received:	Mar,23 2022 04:41:41
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are

dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	306 Project: 103522 Document: 118739
Name:	Pfaller, Robert G
Received:	Mar,23 2022 05:00:21
Correspondence Type:	Web Form
Correspondence: To whom it concerns	

Full disclosure, I did cut and paste the below paragraph.

I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Now my comments. I had the pleasure of using Paradise Helicopters during a visit to Oahu a couple of years ago and consider my time with them over the island one of the highlights of my adult life and would hope they are able to continue providing that experience for future visitors to your beautiful State. I respectfully ask you to carefully consider if these restrictions are actually needed and truly accomplish anything.

Thank you for your time today Bob Pfaller Lowell Michigan

Correspondence ID:	307 Project: 103522 Document: 118739
Name:	Holeton, Kerry J
Received:	Mar,23 2022 05:04:02
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

Air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices

represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	308	Project: 103522 Document:	118739
Name:	Shaw,	Matthew E	
Received:	Mar,2	3 2022 05:13:28	
Correspondence Type:	Web F	form	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Correspondence ID:	309	Project: 103522 Document:	118739
Name:	Merrin	nan, Terence	
Received:	Mar,23	3 2022 05:20:00	
Correspondence Type:	Web F	orm	

Correspondence: It would be a shame if the helicopter trips where stopped, we took a trip on Paradise Helicopters in 2018 it made our holiday to the Big Island.

Correspondence ID:	310	Project: 103522 Document:	118739
Name:	Kopp,	Sandra	
Received:	Mar,23 2022 05:33:33		
Correspondence Type:	Web F	orm	

Correspondence: Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

Correspondence ID:	311	Project: 103522 Document:	118739
Name:	McKe	nzie, Nan	
Received:	Mar,2	3 2022 05:43:47	
Correspondence Type:	Web F	orm	

Correspondence: I enjoyed our Helicopter tour in Hilo. Our pilot was a former military pilot and was very knowledgeable and Confident. I felt completely safe with him and enjoyed every ministers of the tour.

Correspondence ID:	312	Project: 103522 Document:	118739
Name:	Barth,	Deborah	
Received:	Mar,23	3 2022 05:51:35	
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	313 Project: 103522 Document: 118739
Name:	MCALLISTER, ROBERT D
Received:	Mar,23 2022 05:52:05
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots and passengers. From what I have read Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces .I would love to be able to hike the park but am no longer able. The years have been rough on me. Helicopter tours provide me with the access to view and learn about a subject that has fasinated me since childhood.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support. As with any small business they are vital to the local economy.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. They do create a level of noise some object to but less real impact then trails and ground based vehicles. Higher-flying aircraft spread their sound signature further. They are the only good access some of us have to much of the park.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe and drasticly reduce the experience of the park for the passenger .I've seen the weather patterns at the National Park, they are dynamic and pilots need flexibility to make safe decisions and options for choosing their route and altitude. As a former pilot (fixed wing) I totally understand what they have to deal with.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect there communities, flight safety, the state's economy and park accessibility for many should many of the current proposals be incorporated.

Correspondence ID:	314 Project: 103522 Document: 118739
Name:	Burtner, Jeffrey L
Received:	Mar,23 2022 06:20:42
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

Air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	315	Project: 103522 Document:	118739
Name:	Chand	ler Helton, Barbara L	
Received:	Mar,23	3 2022 06:20:51	
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

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Correspondence ID:	316	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,23 2022 06:26:05		
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	317 Project: 103522 Document: 118739	
Name:	Fox, Gloria	
Received:	Mar,23 2022 06:29:28	
Correspondence Type:	Web Form	
Correspondence: I enjoyed my ride and hope the limitations do not spoil the experience.		
Correspondence ID:	318 Project: 103522 Document: 118739	
Name:	Fitzhugh, Patricia J	
Received:	Mar,23 2022 06:36:57	

Web Form

Correspondence Type:

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support..

The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

We flew over the volcanoes on our trip to Hawaii, and that was one of the main reasons we went. There are things you can't see from the ground, and things that don't make that much of an impact. I am not a beach person, and the fly-over was the highlight of our trip. I am too old to "hike" and my asthma prevents me from doing so. As much as it costs for a tourist to visit your state, there must be something for a tourist to do that they can't get anywhere else. We were just talking about another trip to Hawaii to fly the helicopter over the volcanoes again.

Correspondence ID:	319	Project: 103522 Document:	118739
Name:	Gritter	rs, Marcia S	
Received:	Mar,23	3 2022 06:37:26	
Correspondence Type:	Web F	orm	

Correspondence: My husband I visited Hawaii in early 2020, before covid hit. For states and countries that rely on tourism the way Hawaii does for it's economy, Covid had to have been devastating! We loved to be able to see God's beautiful creation that was the state of Hawaii. Because of age and mobility issues, and because some of those absolutely gorgeous vistas are only visible from the air, we took a helicopter ride around the Island of Hawaii. We were able to see the most amazing waterfalls, we were able to see the small amount of lava that was visible to the surface of the earth, we were able to see the coffee fields spread out, we were able to distiguish the old lava flows from the newer ones. It was spectacular in a way only looking from above would afford, and although expensive, it was the best money we spent on our trip to The Islands.

Now I see that there is an initiative that may restrict the airways in a way that would make flying for the helicopter companies prohibitive for those companies. No one knows how to fly those islands better than the pilots that do it on a daily basis. No one can tell you air currents and storm movement the way those pilots can. We had to make adjustments in our flight from the regularly scheduled because the weather wasn't cooperating from the norm, but because the pilots had the freedom to choose a different route, we were still able to go and have a most spectacular day!

At least in your deliberations, please have a native pilot to help you understand the individual personalities of the islands and how terrain and weather can affect flight paths, please!

These are my personal comments, and I will include the comments sent by the Flight company because I feel they are more official that my weak plea. Thanks, Marcia Gritters

I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	320 Project: 103522 Document: 118739
Name:	Cameron, Christine M
Received:	Mar,23 2022 06:38:59
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Correspondence ID:	321 Project: 103522 Document: 118739
Name:	Callanan, Kevin
Received:	Mar,23 2022 06:45:54
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	322	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,23 2022 06:48:23		
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	323 Project: 103522 Document: 118739
Name:	Waldmanj, Adam
Received:	Mar,23 2022 06:49:29
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	324 Project: 103522 Document: 118739
Name:	Mendez Chacon, Edgar S
Received:	Mar,23 2022 06:49:49
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	325	Project: 103522 Document:	118739
Name:	Wittru	p, Evan	
Received:	Mar,23	3 2022 06:50:50	
Correspondence Type:	Web F	orm	

Correspondence: We had the pleasure to be part of a Paradise Helicopter tour. We flew from the Kona Airport and we had an extensive tour of the island and the Hawai'i Volcanoes National park. During that flight we did not observe any other aircraft and we had an enjoyable but uneventful flight. The weather was partly cloudy but we had a good view of the park. There was minimal volcanic activity when we viewed the park. The employees that worked for Paradise Helicopters were very courteous and professional. This includes the ground staff and the pilot. In my opinion we were provided with a safe and enjoyable experience. Overall this was a well run tour and provided us with a memorable experience.

Evan & amp; Sue Wittrup Toronto, Canada Received:

## Mar,23 2022 06:55:17

Correspondence Type:

Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	327	Project: 103522 Document:	118739
Name:	Luczał	k, Edward J	
Received:	Mar,23 2022 06:59:08		
Correspondence Type:	Web F	orm	

Correspondence: Air tours are one of the least evasive ways of viewing nature. Your focus should be on people on the ground, taking rocks, smashing vegetation, leaving trash, defacing the environment and simply leaving a human footprint that changes what nature provided for us. Please do not implement this ATMP policy. The points below also cover many other concerns.

I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are

dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Thank you Edward Luczak

Correspondence ID:	328	Project: 103522 Document:	118739	
Name:	berger, jan			
Received:	Mar,23 2022 07:00:04			
Correspondence Type:	Web Form			
Correspondence: Please let paradise helicopters keep flying				
Correspondence ID:	329	Project: 103522 Document:	118739	
Name:	Wier, David S			
Received:	Mar,23 2022 07:04:24			
Correspondence Type:	Web Form			

Correspondence: Dear NPS officials:

I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Dave Wier

Correspondence ID:	330 Pr	oject: 103522 Document:	118739	
Name:	Cenac, Set	Cenac, Seth		
Received:	Mar,23 202	22 07:14:40		
Correspondence Type:	Web Form	1		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

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Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	331         Project: 103522         Document:         118739	
Name:	West, Geri	
Received:	Mar,23 2022 07:24:28	
Correspondence Type:	Web Form	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Correspondence ID:	332         Project: 103522         Document:         118739
Name:	Batten, Roland A
Received:	Mar,23 2022 07:27:13
Correspondence Type:	Web Form

Correspondence: I was fortunate to visit your beautiful island four years ago when my daughter treated me and my wife to a holiday to celebrate my 75th birthday. Part of my birthday treat was a flight in a helicopter with Paradise Helicopters over the active volcano.

It was the highlight of my holiday, not only giving me the once-in-a-lifetime experience of seeing an active volcano at fairly close quarters from the safety of a helicopter, but the trip to and from it, enabled me to see some of the beautiful island. It would be a shame if other visitors to your island were denied the trip that I so much enjoyed. Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Helicopter flights must surely impact less on the environment than many other forms of tourism transport and, in the case of a volcano, enable tourists to "get up close" safely, something a ground visit would not permit.

Correspondence ID:	333	Project: 103522 Document:	118739	
Name:	hunt, a	hunt, adrian r		
Received:	Mar,2	Mar,23 2022 07:30:29		
Correspondence Type:	Web F	orm		

Correspondence: I have visited Hawaii over a dozen times, often enjoying tours of the islands by helicopter. Many of us are concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). These restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

• Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.
Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	334 Project: 103522 Document: 118739	
Name:	Hartshorn, Nicole	
Received:	Mar,23 2022 07:36:14	
Correspondence Type:	Web Form	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would negatively impact or eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. The hit the Hawaii economy has taken during the pandemic may never recover if eliminating this piece of significant stimulus.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. We would hate to see other types of tours increase that harm the landscape.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. These tours we've taken several times are part of what draws our family to the island.

Thank you for this opportunity to comment. Please consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated. Please revise your plans! Thank you

Correspondence ID:	335	Project: 103522 Document:	118739
Name:	, Luke		
Received:	Mar,23 2022 07:46:50		
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	336         Project: 103522         Document:         118739	
Name:	Luczak, Patricia M	
Received:	Mar,23 2022 07:51:58	
Correspondence Type:	Web Form	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

I have had the opportunity to experience a helicopter ride while visiting the Big Island, it was the highlight of my trip. At 64 years old, I would not have been able to traverse the area otherwise. Other future visitors should be able to enjoy this safe means of viewing the beauty of the island.

Correspondence ID:	337         Project: 103522         Document:         118739
Name:	Salmans, Mark A
Received:	Mar,23 2022 07:52:06
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

• Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

• Air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

• Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

• Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

• The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

My wife, Cindy, and I thoroughly enjoyed our recent trip to the big island. We had a wonderful experience. We would not nearly have seen as much in such a short time-frame without taking the helicopter ride. The helicopter ride allowed us to also view your gorgeous volcanoes in a safe manner. Please do not destroy such a pleasant and memorable experience for other tourists by overregulating the helicopter companies and diminishing their joy and wonder for your beautiful island.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	338	Project: 103522 Document:	118739
Name:	Theric	ot, Lester	
Received:	Mar,23	3 2022 07:53:53	
Correspondence Type:	Web F	orm	

Correspondence: Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further

Name:	Bowen, Jeremy L
Received:	Mar,23 2022 08:09:09
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Sincerely Jeremy Bowen

Correspondence ID:	340         Project: 103522         Document:         118739
Name:	Kwiatek, Bogdan M
Received:	Mar,23 2022 08:13:29
Correspondence Type:	Web Form

## Correspondence: Hello,

As an international tour guide I was leading tours to different countries in the world, and most of the states in the United States of America. Many times in many places I have used air tours with flying companies: TAT at Denali NP, Papilon at Grand Canyon NP, Air Safari at Mt. Cook/Aoraki NP in NZ, heli over Iguazu waterfall NP in Brasil, Vatnajokull NP glacier and volcanoes in Iceland or Down Under Cruise and Dive flying heli over Great Barrier Reef in Cairns Australia. Same way I was lucky to fly with my groups over Hawai'i Volcanos NP partnering with Paradise Helicopters from Hilo.

I see HVNP and possibilities to fly over the lava field as a major tourist attraction in Hawaian Islands and especially on Big Island and the unique perspective to see and understand extreme forces of Mother Nature to create and destroy.

I write it as a response to some restrictions planned to take according to their operations. Please make the plans resonable and balanced cause it would be a big loss when limiting space and time for their flights. HVNP is a gem worth to visit from many ways: roads, sea and air. And the air visit is both quick and compact way of getting knowledge about the Park.

Best regards, Bogdan Kwiatek

Correspondence ID: Name: Received: 341 Project: 103522 Document: 118739
Bates, Gibby
Mar,23 2022 08:18:38

Correspondence Type:

#### Web Form

Correspondence: My helicopter tour was just about the best part of my visit to HI. I've been telling people they should do the tour if they travel to your state. It's such a unique and exhilarating experience and way to view the beauty of the islands. Please don't over-regulate. This was the first time and probably the only time I would ride in a helicopter.

Correspondence ID:	342         Project: 103522         Document:         118739
Name:	Nachtwey, Steve W
Received:	Mar,23 2022 08:20:07
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Correspondence ID:	343	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,23	3 2022 08:23:59	
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Correspondence ID:	344         Project: 103522         Document:         118739
Name:	Reis, Valerie
Received:	Mar,23 2022 08:27:01
Correspondence Type:	Web Form

Correspondence: Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Our visit to the island would not have been as memorable or magnificent as it was if not for Paradise Helicopter tours and the route we went. They were completely professional and took all precautions.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Correspondence ID:	345 Project: 103522 Document: 118739
Name:	Wade, Guy I
Received:	Mar,23 2022 08:33:27
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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• Air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

• Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

• Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

• The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	346	Project: 103522 Document:	118739
Name:	McMi	chael, Deborah	
Received:	Mar,23	3 2022 08:33:48	
Correspondence Type:	Web F	orm	

Correspondence: 1

I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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and elderly.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Thank you for your time. This is so important to all Americans who could hope to see such a wonderful site as Hawaii National Park . Please do not take this National Treasure and make it so it cannot be safely enjoyed by all.

Sincerely,

Deborah McMichael

Forward

Correspondence ID:	347	Project: 103522 Document:	118739
Name:	Wendle	er, Brandy	
Received:	Mar,23	2022 08:34:34	
Correspondence Type:	Web Fo	orm	

Correspondence: Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Correspondence ID:	348         Project: 103522         Document:         118739
Name:	Darmokid, Bernard L
Received:	Mar,23 2022 08:36:18
Correspondence Type:	Web Form

Correspondence: Our helicopter tour over the lava fields was the highlight of our trip. I recently learned about changes that i have some concerns about.

I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Correspondence ID:	349         Project: 103522         Document:         118739
Name:	, Scott
Received:	Mar,23 2022 09:04:34
Correspondence Type:	Web Form

Correspondence: Hi, in 2019 we took a vacation to Hawaii first visiting Kauai and then spending an additional four days on the Big Island Hawaii. While on the Big Island we took a tour to Mauna Kea and a second tour on Paradise Island Helicopters. Both tours were EPIC once in a life time experiences. Being on the older side as adventurous retired individuals we wanted to see as much as we could with the limited time we had. The bus tour to Mauna Kea was excellent and easily manageable by my wife & amp; I. The Helicopter tour was the icing on the cake flying over Kilauea volcano and then flying up the North side of the island to see the various waterfalls. They dropped us off in a valley where we met up with another tour group to hike into see various waterfalls. Had we taken the bus tour to the Valley it would have been too long and too much for us. Having the helicopter drop us off in a verdant valley was AMAZING. The views from the helicopter were AMAZING. While only having flown in a helicopter once before (Grand Canon tour) I felt Paradise Island did an EXCELLENT job providing us amazing views, we felt safe in the handling by the pilot, and just totally enjoyed the experience. I have read online several stories about the park service considering restricting access to various areas and while I understand park management has to do what is best for the environment, the parks inhabitants, and I don't fully understand what the needs are for additional restrictions....I hope you allow helicopter tours to continue like Paradise does. These are once in a life time experiences for folks who can make it to your islands. I would have thought some of the fee's charged go to park preservation and improvement. Rather than restrict the flights please consider increasing the fee's to gain the benefits of the tour operators providing these experiences. I struggled to find a time/date that would accommodate my wife and I's visit so clearly there is a demand for these tours. IF we are ever fortunate enough to return to Hawaii we would love to do these tours or one like them again.

Correspondence ID:	350	Project: 103522 Document:	118739
Name:	Newel	l, Susan	
Received:	Mar,23	3 2022 09:11:59	
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Correspondence ID:	351 Project: 103522 Document: 118739		
Name:	, James		
Received:	Mar,23 2022 09:21:09		
Correspondence Type:	Web Form		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

I have visited Hawaii many many times over the past 50 years. It is my most favorite piece of land on this entire planet. For the past 20 years, I have had to resort to helicopter tours since I am physically restricted from hiking or walking to see the marvels of the islands up close.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	352 Project: 103522 Document: 118739			
Name:	Kraynack, Bryan			
Received:	Mar,23 2022 09:22:42			
Correspondence Type:	Web Form			

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	353 Project: 103522 Document: 118739
Name:	Sanders, Barbara W
Received:	Mar,23 2022 09:23:08
Correspondence Type:	Web Form

Correspondence: As a previous customer of Air tours, I strongly oppose the proposal to restrict pilots routes further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Please reconsider your restrictive and short sighted proposal Sincerely Barbara Sanders

Correspondence ID:	354 Project: 103522 Document: 118739
Name:	Chang, Vivian R
Received:	Mar,23 2022 09:25:40
Correspondence Type:	Web Form

Correspondence: I took a helicopter tour with Paradise Helicopters when the volcano on the Big Island was erupting. It was my first (and maybe last) helicopter ride - I did not know I could get "car sick" when flying, or maybe it was the sulfur fumes? I had also visited Hawaii Volcanos National Park previously, by car, and it was amazing - but nothing like seeing it from the air.

Despite my mild nausea, it was one of the most awesome moments of my life. I got to see a live volcano erupting, with liquid lava running down the slopes of the Big Island, into the sea. With the experienced local pilot making sure we got a good view, while carefully monitoring the smoke, wind, heat and fume conditions, I got to see Pele making more island.

I live on Oahu, and I am concerned about tourism and visitors vs those who live here, in Instagrammed scenic spots. We are a visitor destination because of our remoteness, our incredible landscape, and our aloha lifestyle.

We need to carefully balance our economic needs with the impact of too much of the wrong kind of tourism. What we locals know about our environment, and how to safely manage the real risks and rewards of the beauty of our home, are priceless assets.

Helicopters fly over my house, on the way to visit Diamondhead. But these visitors are touring Oahu without driving cars on our roads and parking at our surf spots, as they get the big picture. They bring money to our state, and I am sure that they are awed and humbled by the specialness of our island home.

Please carefully consider the testimony of Paradise Helicopters about legislation on the impact of certain aspects of the Air Tour Management Plan for Hawaii Volcanos National Park. They know their stuff, and their tours bring value to those of us lucky enough to see Hawaii in a comprehensive manner.

Correspondence ID:	355	Project: 103522 Document:	118739
Name:	Ferguson, Jeffrey		
Received:	Mar,23 2022 09:30:17		
Correspondence Type:	Web F	form	

Correspondence: Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

Correspondence ID:	356	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,2	3 2022 09:30:18	
Correspondence Type:	Web F	form	

Correspondence: I fully support the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Thank you for protecting our precious natural resources!

Correspondence ID:	357	Project: 103522 Document:	118739
Name:	Farver, Kelly		
Received:	Mar,23 2022 09:30:24		
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Our trips to Hawaii and use of Helicopter tours have been some of our greatest highlights. Please do not regulate these tours to the point of extinction.

Kelly

Correspondence ID:	358	Project: 103522 Document:	118739	
Name:	Hinz, Wolfgang			
Received:	Mar,2	3 2022 09:44:54		
Correspondence Type:	Web F	orm		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy, and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	359	Project: 103522 Document:	118739
Name:	Haney, Douglas		
Received:	Mar,23 2022 09:46:12		
Correspondence Type:	Web F	orm	

Correspondence: I am writing to comment on the proposed restrictions on flying tours over the Hawaii Volcanoes National Park by helicopter tour operators. I just finished reading the proposal for the Air Tour Management Plan in the February 2022 Newletter. I am currently a Boeing 777 captain with a major airline, and have over 10,000 flight hours over a 40 year career.

I have had to opportunity to take a tour of the HVNP twice with the Paradise Tour company in one of their helicopters. On both occasions, the pilots conducting the tour were extremely professional and focused on providing their passengers with a thrilling once-in-a-lifetime experience over the wonders of the park. At the same time, they were extremely focused on safety and on minimizing their impact on the park below.

The tours out of Hilo I took, flew over the PuU 'O "O crater at about 2000 feet above the ground I'd estimate, then flew along the lava flow down to where it entered the ocean, and then flew back over some of the waterfalls east of the park southwest of Hilo. At no time did I observe us coming close to any noise-sensitive areas, or to anyone on the ground at all.

There is no way we could have observed the wonder of the PuU 'O 'O crate were it not for the Paradise helicopter tour.

I would urge the park service to be cautious in imposing too many more restrictions on the air tour operators that conduct tours above the park. They provide a service that is obviously in great demand by the American public and other foreign visitors. If you impose severe restrictions that require the operators to fly too high or avoid the

lava flows, you will probably cause the operators to lose business and eventually go out of business. That will also lead to lost tax revenue, lost jobs, and a severe impact on the local economy.

If restrictions to the air tours are needed, they should be limited to not just mitigating noise impacts on the ground near sensitive areas of the park, but they should also recognize the financially significant impact the tour operators have on the local economy, along with the valuable perspective they offer park visitors to the wonders of the park.

Correspondence ID:	360	Project: 103522 Document:	118739	
Name:	Jensen, Jan			
Received:	Mar,23 2022 09:49:10			
Correspondence Type:	Web F	orm		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Correspondence ID:	361	Project: 103522 Document:	118739
Name:	Stewart, Douglas W		
Received:	Mar,23 2022 09:54:13		
Correspondence Type:	Web F	orm	

Correspondence: We previously visited and enjoyed our Helicopter Tour of the Big Island. This was a unique oportunity and provide first hand the significant impacts of volcanoesand transofration of the natural and built environment. We felt safe and were well looked after by our pilot. Our birds eye view was unique and very informative. We also saw how the pilot had to adjust our flight to meet the conditions of the day to ensure our enjoyment and saftey.

We are concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

Air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

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Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Douglas

Correspondence ID:	362 Project: 103522 Document: 118739
Name:	LaPlante, Tommy
Received:	Mar,23 2022 09:56:06
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Correspondence ID:	363	Project: 103522 Document:	118739	
Name:	Ballard, Jacki			
Received:	Mar,23 2022 09:58:02			
Correspondence Type:	Web F	orm		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Correspondence ID	):	364	Project: 103522 Document:	118739
Name:		OBrien, Michael		
Received:		Mar,23	3 2022 09:59:15	
Correspondence Ty	pe:	Web F	orm	
Correspondence:	Professional organization. I	Pilots and	d staff were attentive to custome	rs and safety was priority

Correspondence ID:	365	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,2	3 2022 10:01:02	
Correspondence Type:	Web F	orm	

Correspondence: I enjoyed a helicopter tour with my sisters (one of whom is handicapped) in February 2021. It was a highlight of my life and I have travelled and seen things all around the world. I think it is a wonderful, stunning, non-invasive way to enjoy our beautiful island and Hawaii Volcanoes National Park.

I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	366 Project: 103522 Document: 118739
Name:	Jow, Rick
Received:	Mar,23 2022 10:01:07
Correspondence Type:	Web Form

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plans for Hawaii Volcanoes National Park.

I have serious concerns with the development process of the Air Tour Management Plans (ATMP) by the National Park Service (NPS) and the Federal Aviation Administration (FAA). NPS and the FAA have ignored 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. Excluding the NPOAG from providing input on the ATMP process is in direction contradiction of FAA Order No. 1110.138A.

NPS does not have the necessary expertise to fundamentally redesign the airspace over these parks. The ATMPs proposed by NPS would relocate, constrict, and combine flight routes and would make substantial changes to flight altitudes. The current flight routes and altitudes have been in place for years and are well understood by industry. The changes proposed by ATMP have severe aviation safety implications that should have been deliberated in the NPOAG, as Congress intended in the National Parks Air Tour Management Act of 2000.

The proposals currently under consideration will force aircraft into potentially unsafe flight conditions. The NPS has proposed increasing the minimum flight altitude over Hawaii Volcanoes National Park from an allowed minimum 500 feet AGL to 1,500 feet AGL, which does not provide adequate safe options for navigation in typical weather patterns that exist in the park. Even more concerning is that the proposals have fixed narrow flight routes that do not take into account the areas constantly changing weather patterns.

I also have serious concerns with the economic impact these plans will have on helicopter air tour companies. The draft plans' flight allocation numbers do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change and NPS needs to respect that dynamic, as visitors alter their destinations according to those trends.

The NPS has failed to reach out to the operators to enquire what economic impacts might arise implementing a management plan that restricts overflights. Operators are already suffering economically post COVID-19, loosing over 80% of their businesses due to the shutdown of international travel. Further restrictions will cripple an already fragile industry trying to rebuild.

In 2020, Hawaii Volcanoes National Park welcomed 590,000 visitors, a 57% decrease from 2019 when the park welcomed over 1,300,000 visitors. This year many National Parks saw their resources strained by the large number of visitors as the public began to travel again. Air tours are an important option for many visitors conducting a one-in-a-lifetime trip to see famous natural landmarks. Visitors taking advantage of air tours benefit by avoiding traffic, wait times, and walking trails that are inaccessible for the handicapped or elderly, while reducing congestion and demand on park infrastructure.

Like ground-based tours, air tours are a valid part of our visitor experience, providing a unique window from which we can share our cultural, historical and environmental sites with the world. Air tours require no ground-based infrastructure at the park, which allows visitors accessibility without the need for roads, trails, signs, bathrooms, garbage cans, or other services.

By further restricting an already limited number of allowable air tours, we are reducing opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance. Through carbon-offset efforts and strict altitude requirements to control noise just to name a few efforts air-tour operators are working to ensure they are responsi

Correspondence ID:	367	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,23	2022 10:15:48	
Correspondence Type:	Web Fo	orm	

Correspondence: We live in Pennsylvania and visited Hawaii in 2017. During our stay on the Big Island we were able to take a helicopter tour to see the area by air. It was one of the highlights of our trip. The helicopter service was very well-managed and the tour was conducted cautiously in terms of safety and consideration for the

environment and individuals on the ground. It would be unfortunate if these tours were not able to continue because of excessive regulatory restrictions. Please consider these comments during the evaluation process.

Correspondence ID:	368	Project: 103522 Document:	118739
Name:	DeCar	lo, Laura	
Received:	Mar,23	3 2022 10:22:43	
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	369	Project: 103522 Document:	118739	
Name:	Seibel, Eric A			
Received:	Mar,2	3 2022 10:23:12		
Correspondence Type:	Web F	orm		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	370	Project: 103522 Document:	118739
Name:	String	nam, Joy	
Received:	Mar,2	3 2022 10:23:53	
Correspondence Type:	Web F	orm	

Correspondence: We flew with Paradise Helicopters and the safety instructions and concern for our well being was acutely evident. We had every confidence in our pilot and truly believe that he needs the ability to alter flight path and altitude to keep us safe. It was an awesome experience flying around active lava flows while maintaining a safe distance. We would not have gotten to experience this as we are not be able to experience this type of adventure any other way. We are older and hiking or ATV are not a option. The helicopters provide a valuable service, especially for elders and handicap issues . I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Correspondence ID:	371	Project: 103522 Document:	118739	
Name:	Martell, Rodolfo			
Received:	Mar,23 2022 10:25:16			
Correspondence Type:	Web F	orm		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Correspondence ID:	372 Project: 103522 Document: 118739		
Name:	, Don		
Received:	Mar,23 2022 10:26:03		
Correspondence Type:	Web Form		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Correspondence ID:	373	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,2	3 2022 10:43:26	
Correspondence Type:	Web F	orm	

Correspondence: The limitation of helicopter flights over Volcano National Park, will lead to increased numbers of visitors trespassing into the caldera in order to gain a vantage point to view lava floes. Trespassing visitors generally require rescue or recovery via helicopter.

Additionally, limiting the flights could eliminate the businesses that provide critical air rescue support as seen during the eruptions in 2018.

The FAA and flying public understand the rigor of flight protocols and the risks involved with aviation.

Restriction of a mode of transportation and tourist funding, will impact not only the Big Island - but the entire state of HI.

Correspondence ID:	374	Project: 103522 Document:	118739
Name:	Donofri	o, Donald M	
Received:	Mar,23 2022 10:51:56		
Correspondence Type:	Web For	rm	

Correspondence: Leave the air tour routes the way the are! I was only in Hawaii, Oahu, for a few days. If it were not for the helicopter tour I would have hardly got to see anything. It was a phenomenal experience that anyone should be able to do. Limiting airspace would have a drastic affect on tourist options.

Correspondence ID:	375	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,2	3 2022 10:54:37	
Correspondence Type:	Web F	orm	
Correspondence: This is a beautiful and safe opportunity to view the volcano experience!			ice!

Name:	Shaffer, James E
Received:	Mar,23 2022 11:00:54
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

When I visited Hawaii in the past I was able to use a helicopter service to fly over the volcano. This is a very valuable service that should be allowed to remain. Please work with the companies providing this service and together come up with safe and sensible regulations that allow for the continuation of the helicopter services in an economic, safe and sensible manner. Don't impose undue regulation on that industry just because you can.

Thanks You!

Correspondence ID:	377	Project: 103522 Document:	118739
Name:	Kende	l, Yvonne	
Received:	Mar,23 2022 11:08:12		
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	378         Project: 103522 Document:         118739	
Name:	Mason, Hilary E	
Received:	Mar,23 2022 11:08:56	
Correspondence Type:	Web Form	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Correspondence ID:	379         Project: 103522         Document:         118739
Name:	Thompson, Wendi D
Received:	Mar,23 2022 11:10:55
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Air tours make people want to protect and support the parks and the state as a whole. Please don't hinder their ability to operate.

Wendi Thompson

Correspondence ID:	380	Project: 103522 Document:	118739
Name:	Schmi	d, Andy	
Received:	Mar,23	3 2022 11:22:27	
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Correspondence ID:	381	Project: 103522 Document:	118739
Name:	Rush, Tami L		
Received:	Mar,23 2022 11:24:18		
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	382	Project: 103522 Document:	118739
Name:	Ayau, Manu		
Received:	Mar,23 2022 11:47:17		
Correspondence Type:	Web F	orm	

Correspondence: Helicopter tours are safe options for all people to see what Pele the volcano goddess looks like.

Correspondence ID:	383 Project: 103522 Document: 118739
Name:	Johnson, Randolph
Received:	Mar,23 2022 11:47:38
Correspondence Type:	Web Form

Correspondence: I received an email from Paradise Helicopters with concerns about ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). We have taken two tours with Paradise Helicopters, both my wife and I and also with two others. The ability to see Hawaii from the air, both the landscape and the volcanic area is not possible without these tours. As a further item to consider, these tours give the handicapped and elderly, along with the general public, views that are not accessible while on the ground, let alone using ground-based vehicles, which would even have a more impactful negative affect on HVNP and the surrounding areas.

We have always felt safe on these tours, and to limit their tours, either by restricting their routes or altitudes makes no sense in that these helicopter companies know the best factors to follow, and by limiting them you are taking away from them being able to use their professional judgement. As a side not, our first experience with scheduling a helicopter ride was a failure, since the weather both days caused the company to cancel flights those two days. Obviously, these companies are being careful with the prevailing conditions and will cancel if there are problems.

These companies were severely hurt by the Pandemic and loss of tourism these last couple of years, and now to institute restrictive guidelines may cause some companies to go out of business. Is this really the goal of this group. If there are problems, are you working with these companies and do they have viable voices in these meetings, or is this a draconian effort by the NPS and FAA to institute policies with little or no input by those who are being affected?

I urge you to work WITH these companies, and if possible in debates, be more lenient to the companies concerns.

Thank you!

Randolph Johnson

Correspondence ID:	384	Project: 103522 Document:	118739
Name:	Chung	, Yip-Wah	
Received:	Mar,23 2022 11:53:30		
Correspondence Type:	Web F	orm	

Correspondence: I am a certificated commercial multi-engine instrument pilot and am an engineering professor teaching at Northwestern University in Illinois. Although my home is in Illinois, I consider Hawaii as my second home state and visit it several times a year, especially the Big Island. During my visit, I sometimes rented a Cessna 172 to fly around the volcanoes and sometimes flew commercial helicopter tours to enjoy the beauty and grandeur of the Volcanoes National Park. As I learned from my colleagues in Hawaii, I am concerned about the Air Tour Management Plan (ATMP) alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of Big Island's economy. With this plan, air tours would have to reroute over other areas, increasing flight times and costing more for both consumers and air tour operators. This could potentially drive some operators out of business, with devastating impacts on many families and individuals. Whether by a Cessna 172 or an air tour helicopter, flying provides a safe way to experience the Park with little environmental impact. This alternative plan forces pilots to fly in fixed narrow corridors and at higher altitudes than are currently allowed. This restriction does not necessarily make flying safer. Remember: the complex interplay among wind, mountain topography, and the volcanoes results in dynamic weather patterns around the National Park. We pilots need flexibility in choosing route and altitude to ensure flight safety in a dynamic environment. Restrictions articulated in ATMP remove that flexibility.

Correspondence ID:	385         Project: 103522         Document:         118739
Name:	Willoughby, Teresa E
Received:	Mar,23 2022 11:54:41
Correspondence Type:	Web Form

Correspondence: We truly enjoyed our helicopter tour around the Island, we toured for two hours and we will continue to book helicopter tours. Helicopters are an easy way to see ever aspect of the National Parks without having to maintain roads and trails for public travel. By using a helicopter there is no maintenance, garbage, National Park Rangers to patrol the areas, no off road vehicles and bikes damaging the Parks.

We love the National Parks and Tourism in Hawaii and around the world.

Thank You

Correspondence ID:	386	Project: 103522 Document:	118739
Name:	Renner	, J.	
Received:	Mar,23	2022 11:57:27	
Correspondence Type:	Web Fo	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

Air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	387 Project: 103522 Document: 118739	
Name:	VIRGIN, TERESA	
Received:	Mar,23 2022 12:10:59	
Correspondence Type:	Web Form	

Correspondence: We had a blast! We flew over the volcanos and the waterfalls along the coast. We saw way more from above that we could ever have saw from the ground! Lots of room in the helicopter. We will do it again!!!

Correspondence ID:	388	Project: 103522 Document:	118739
Name:	LANCA	ASTER, CRAIG A	
Received:	Mar,23	2022 12:11:26	

## Correspondence Type:

#### Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	389         Project: 103522         Document:         118739		
Name:	Pool, Tom		
Received:	Mar,23 2022 12:14:12		
Correspondence Type:	Web Form		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	390	Project: 103522 Document:	118739
Name:	Kantov	vitz, Barry	
Received:	Mar,23	2022 12:14:15	
Correspondence Type:	Web Fo	orm	

Correspondence: I am a senior citizen who took a helicopter flight at Volcano Nat Park that allowed me to view flowing lava I could not have otherwise seen in person. It was a great experience. I hope that any future restrictions will not keep other seniors from taking this trip and have copied below the objections that I support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Correspondence ID:	391	Project: 103522 Document:	118739
Name:	Manmo	ohan, Ed	
Received:	Mar,23	2022 12:15:28	
Correspondence Type:	Web Fo	orm	

Correspondence: I feel air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Also, my girlfriend and I are not competent long-distance hikers and we would have missed so much of your island's beautiful scenery by having to hike to it.

Regards,

Ed

Correspondence ID:	392	Project: 103522 Document:	118739
Name:	Krogh, Dennis J		
Received:	Mar,23 2022 12:26:26		
Correspondence Type:	Web Form		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Respectfully,

Dennis Krogh

Correspondence ID:	393	Project: 103522 Document:	118739
Name:	Spinnir	ng, Kristen	
Received:	Mar,23	2022 12:26:47	
Correspondence Type:	Web Fo	orm	

Correspondence: I received a request from a tour operator to comment on this issue.

Though I fully enjoyed my helicopter experience a few years ago and rank at as one of my most memorable moments, I now regret contributing to the visual and noise pollution of this very special place. As a multiple time visitor to the park on the ground, I agree with the assessment that unrestricted helicopter traffic negatively impacts the vast majority of people who can not view it from the sky. I would very much prefer to see greater restrictions in place.

Correspondence ID:	394	Project: 103522 Document:	118739
Name:	EFRO	N, Paul	
Received:	Mar,23	3 2022 12:28:21	
Correspondence Type:	Web F	orm	

Correspondence: Paradise Helicopters was completely professional. I felt safe at all times and had a fantastic experience. The take safety seriously. My initial flight was scrubbed because of weather. It was iffy on the other side of the island. They chose to be safe and not fly that day. They honored my payment and got me on a flights a few days later. The way the regulations are now, do not need to be changed in my opinion.

Correspondence ID:	395         Project: 103522         Document:         118739	
Name:	Colenbrander, Ariane	
Received:	Mar,23 2022 12:28:31	
Correspondence Type:	Web Form	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP).

Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country.

These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place.

Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Correspondence ID:	396         Project: 103522         Document:         118739
Name:	CALABRO, RICHARD A II & M
Received:	Mar,23 2022 12:28:41
Correspondence Type:	Web Form

Correspondence: I recently learned of yet another restrictive regulation proposed by the National Park Service for Hawaii Volcanoes National Park that I want to urge you DO NOT implement. Hawaii's air tours are a wonderful way to experience the park in a safe way. These restriction will certainly make these tours less safe by limiting the pilots ability to make safe flying decisions when flying routes of these public spaces. Making fixed routes and higher altitudes will endanger the aircrafts unnecessarily. I fear the result of this proposal will force small business to cease operations and result in a loss of jobs and tourism dollars for Hawaii's economy. I urge you to not implement the restrictions being propose.

Correspondence ID:	397         Project: 103522 Document:         118739		
Name:	Long, Kim		
Received:	Mar,23 2022 12:29:46		
Correspondence Type:	Web Form		

Correspondence: I'm concerned about the proposed restrictions to flights over Hawaii's Volcanoes National Park.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Vehicle tours and their associated traffic and parking problems, would increase pollution and damage to parklands, while not allowing visitors a chance to truly see the size and beauty of the volcanoes, especially if they are erupting and the NPS is restricting access. Eliminating or restricting air tours unnecessarily impedes accessibility for the handicapped and elderly, and increases the environmental footprint of those who do visit.

Air tours are a safe way to experience the park. However, forcing pilots to fly helicopters in fixed narrow routes and at higher altitudes than are already allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their routes and altitude.

Correspondence ID:	398         Project: 103522         Document:         118739
Name:	Mol, Lisa
Received:	Mar,23 2022 12:29:56
Correspondence Type:	Web Form

Correspondence: What are you thinking? We loved our air tour.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Correspondence ID:	399	Project: 103522 Document:	118739
Name:	Perez,	Christopher J	
Received:	Mar,23	3 2022 12:33:59	
Correspondence Type:	Web F	orm	

Correspondence: As a frequent visitor of Hawaii Volcanoes National Park, I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	400	Project: 103522 Document:	118739	
Name:	Gregory, Kalei			
Received:	Mar,23 2022 12:37:52			
Correspondence Type:	Web F	orm		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Correspondence ID:	401	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,2	3 2022 12:38:44	
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts access to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need the flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy, and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	402	Project: 103522 Document:	118739
Name:	SPRIN	KLE, TOMMY L	
Received:	Mar,23	3 2022 12:38:56	
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Correspondence ID:	403	Project: 103522 Document:	118739
Name:	Dowli	ng, Pete	
Received:	Mar,2	3 2022 12:39:36	
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	404 Project: 103522 Document: 118739		
Name:	Makowski, James M		
Received:	Mar,23 2022 12:42:22		
Correspondence Type:	Web Form		

Correspondence: \*\*\*Please do not sell or provide my PII to anyone outside your organization\*\*\*

I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	405 Project: 103522 Document: 118739	
Name:	Waller, Anne	
Received:	Mar,23 2022 12:42:45	
Correspondence Type:	Web Form	

Correspondence: Dear NPS,

One of our highlights while visiting the Big Island in 2016 was begin able to experience a helicopter flight over Kilauea with Paradise Helicopters. I previously had visited the park in December of 1979 but only remember standing along a fence with not much to see.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Helicopters are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

The overly restrictive ATMP proposals that are currently under consideration constrain access to our public spaces and even have the potential to force longtime businesses on the Island of Hawaii to close for good.

Please allow people to continue to enjoy Hawai'i Volcanos National Park by helicopter.

Kind regards,

Anne Waller

Correspondence ID:	406 Project: 103522 Document: 118739
Name:	Kedersha, Kip
Received:	Mar,23 2022 12:43:50
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives suggested by the NPS for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly.

In our most recent visit to Hawaii, the helicopter tour we took was, and will be, the most memorable part of our trip. We would hate to see this wonderful opportunity to be restricted, which would likely negatively affect Hawaii tourism.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	407	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,23	2022 12:45:33	
Correspondence Type:	Web Form		
Correspondence: safety must come 1st			
Correspondence ID:	408	Project: 103522 Document:	118739

Name: Received: Correspondence Type:

Mar,23 2022 12:45:49 Web Form

Correspondence: Please allow the pilots to fly over the National park. We flew it and it was the Best time we had. We would want generations to enjoy this in safely manner.

Sodani, Kirti

Correspondence ID:	409	Project: 103522 Document:	118739
Name:	Collins	, James	
Received:	Mar,23	2022 12:46:03	
Correspondence Type:	Web Fo	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	410	Project: 103522 Document:	118739
Name:	Kreide	el, Axel H	
Received:	Mar,2	3 2022 12:46:21	
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	411 Project: 103522 Document: 118739
Name:	Ginsberg, Lawrence E
Received:	Mar,23 2022 12:46:33
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	412 Project: 103522 Document: 118739
Name:	DiMartino Jr, Frank
Received:	Mar,23 2022 12:46:36
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Name:	Cleverly, Douglas R
Received:	Mar,23 2022 12:48:37
Correspondence Type:	Web Form

Correspondence: To whom it may concern...

We have enjoyed Hawaii four times in the past decade and the last two trips we visited a lot of the wilderness by air, especially the volcanoes.

This is a unique means to see something tourists rarely if ever get to see and it is a privilege to have such a service amongst your tourism portfolio.

The protection of this service and its freedoms is critical as it promotes indigenous peoples, their lands and we had a great deal of discussion about the ceremonial sites. The service clearly provides interested people with an extremely unique insight into not just the cultural aspects of the land but also the land itself, which is globally unique. Restricting this access is to restrict learning and this is against the mission statement for NPS, which is...

The National Park Service preserves unimpaired the natural and cultural resources and values of the National Park System for the enjoyment, education, and inspiration of this and future generations.

I trust that any restrictions to access, learning and enjoyment of Hawaii from the air are measured agents the enormous cultural good and sheep pleasure that comes from it. We are from New Zealand and we love our outdoors, we want to keep loving the Hawaii outdoors too, all the best, Cleverly Family

Correspondence ID:	414 Project: 103522 Document: 118739	
Name:	Smith, Rebecca	
Received:	Mar,23 2022 12:48:53	
Correspondence Type:	Web Form	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Correspondence ID:	415 Project: 103522 Document: 118739
Name:	,
Received:	Mar,23 2022 12:54:49
Correspondence Type:	Web Form

Correspondence: When I visited Hawaii, the helo tour over the volcano area was a highlight. I don't believe therd is a better way to appreciate the size and power of these geological phenomena than to fly over the vast lava fields. I hope that the USNPS and helo services can cooperate and continue to make these flights possible and safe. That said, the resource itself must be respected, so rules protecting the volocanos as well as all tourists need to exist and be enforced.

Correspondence ID:	416 Project: 103522 Document:	118739
Name:	Segler, Christopher P	
Received:	Mar,23 2022 12:55:00	
Correspondence Type:	Web Form	

Correspondence: Dear National Park Service,

I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Thank you,

Christopher Segler

Correspondence ID:	417 Proje	ect: 103522 Document:	118739
Name:	WYZLIC, Ale	lexandre	
Received:	Mar,23 2022	12:56:25	
Correspondence Type:	Web Form		

Correspondence: Greatings,

I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Best Regards				
Alexandre WYZLIC				
Correspondence ID:	418	Project: 103522 Document:	118739	
Name:	Erich,	Erich, John T		
Received:	Mar,2	3 2022 12:56:32		

Correspondence Type:

# Web Form

Correspondence: Thank you for this opportunity to comment.

As you read the comments below, you will note that they were pre-prepared for this submission. However, this does not mean I don't agree with the comments. I had a 40-year career working for the USFS and then environmental agencies in two states. I also worked for Carson Helicopters as a signalman where my ultimate purpose was safety. I have also been involved with the EMS services in an agency that interacts with air-medical services more than any other agency in our region. Therefore, I feel that my comments concerning air tourism by helicopter have a greater perspective than a "routine tourist".

I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Correspondence ID:	419	Project: 103522 Document:	118739
Name:	White	М.	
Received:	Mar,2	3 2022 12:57:49	
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Received:

Mar,23 2022 12:58:30

Correspondence Type:

Correspondence: Dear NPS,

It has come to my attention that The National Park Service (NPS) is required to create an Air Tour Management Plan (ATMP) for Hawaii Volcanoes National Park and that the overly restrictive ATMP proposals that are currently under consideration constrain access to public spaces and even have the potential to force longtime businesses on the Island of Hawaii to close for good.

Web Form

Importantly, several of the proposals reduce pilot options that are needed to fly safely to avoid volcanic activity, weather, and other aircraft. Hawaii's air-tour operators are already strictly regulated on the number of flights and altitudes at which they can fly.

I have been a visitor to four Hawaiian islands, Maui, Oahu, Kauai and The Big Island. Two of the most memorable moments during these trips where helicopter tours. The most recent being over an active volcano on the Big Island!

Please help local Hawaiian businesses thrive and keep helicopter tours available. They create moments that will be treasured and never forgotten.

Thank you,

Beth Allen

Correspondence ID:	421	Project: 103522 Document:	118739
Name:	Prater,	Michael D	
Received:	Mar,23	3 2022 12:58:37	
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	422 Project: 103522 Document: 118739
Name:	Yeo, Lincoln
Received:	Mar,23 2022 13:03:19
Correspondence Type:	Web Form

Correspondence: My wife and I took a heli tour whilst in Hawaii during our honeymoon a few years ago. It was one of the most memorable things that I've ever done! Nothing else comes close, in terms of allowing you to

experience the scale of the volcanoes, flows, and general national park, than doing it from a helicopter. My appreciation for Hawaiian national parks has grown significantly, as a result of being able to see it from the air like that.

Please don't restrict these guys! I want others to be able to experience what we did, plus I want to do it again!

Regards,

Lincoln Yeo

PS: I <3 Hawaii!

Correspondence ID:	423 Project: 103522 Document: 118739
Name:	Egger, Rudolf
Received:	Mar,23 2022 13:04:28
Correspondence Type:	Web Form

Correspondence: Prefer open sky. For over thirty years we have visited the most beautiful Islands of Hawaii over a hundred times. During all that time I booked once a Helicopter flight in Hilo, Big Island. Wonderful memories and a Pilot who was very sensitive regarding flying over areas where concern are.

Correspondence ID:	424	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,23 2022 13:09:12		
Correspondence Type:	Web F	orm	

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Thank you

Correspondence ID:	425	Project: 103522 Document:	118739	
Name:	Brown, Bridget			
Received:	Mar,23	Mar,23 2022 13:11:47		
Correspondence Type:	Web Fo	orm		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours

over the park. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Correspondence ID:	426	Project: 103522 Document:	118739	
Name:	,			
Received:	Mar,23 2022 13:11:58			
Correspondence Type:	Web F	Form		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

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Correspondence ID:	427	Project: 103522 Document:	118739
Name:	Katzg	raber, Helmut	
Received:	Mar,23 2022 13:12:09		
Correspondence Type:	Web I	Form	

Correspondence: Companies like Paradise Helicopters provide a service in the interest of the islands by showcasing nature and culture. Restricting their air space would heavily impair operations and, frankly, remove tourism from the island.

Correspondence ID:	428	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,23 2022 13:12:39		
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Correspondence ID:	429	Project: 103522 Document:	118739
Name:	Bell, David		
Received:	Mar,23 2022 13:16:47		
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Correspondence ID:	430	Project: 103522 Document:	118739
Name:	HOFF	MAN, DEBBIE	
Received:	Mar,2	3 2022 13:16:56	
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Correspondence ID:	431	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,23 2022 13:17:20		
Correspondence Type:	Web F	orm	

Correspondence: Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Correspondence ID:	432	Project: 103522 Document:	118739
Name:	Rojas, Julian		
Received:	Mar,23 2022 13:19:23		
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Correspondence ID:	433 Project: 103522 Document: 118739		
Name:	Fix, Roger		
Received:	Mar,23 2022 13:19:30		
Correspondence Type:	Web Form		

Correspondence: Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Name:	Helsen, Chris
Received:	Mar,23 2022 13:20:20
Correspondence Type:	Web Form

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Correspondence ID:	435 Project: 103522 Document: 118739		
Name:	Cassou, Jennifer		
Received:	Mar,23 2022 13:20:47		
Correspondence Type:	Web Form		

Correspondence: Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Correspondence ID:	436 Project: 103522 Document: 118739
Name:	Freiburger, Craig A
Received:	Mar,23 2022 13:21:52
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Correspondence ID:	437	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,23 2022 13:23:11		
Correspondence Type:	Web F	Form	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	438	Project: 103522 Document:	118739
Name:	Prindle	e, John	
Received:	Mar,23	3 2022 13:23:17	
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	439 Project: 103522 Document: 118739
Name:	Bryant, Randy W
Received:	Mar,23 2022 13:24:14
Correspondence Type:	Web Form

Correspondence: Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further

We have always looked forward to experiencing The Beauty of Hawaii on our many visits by helicopter

Correspondence ID:	440	Project: 103522 Document:	118739
Name:	Perry, Brian		
Received:	Mar,23 2022 13:24:23		
Correspondence Type:	Web Form		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	441	Project: 103522 Document:	118739
Name:	MAYE	UX, CHARLES J	
Received:	Mar,23	2022 13:25:13	
Correspondence Type:	Web Fo	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Correspondence ID:	442	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,23 2022 13:25:30		
Correspondence Type:	Web Form		

Correspondence: Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Arbitrary limits of days or hours of operation will only compress the amount of operations in weather friendly times. This will put unnecessary pressure on pilots to fly in less than optimal weather, flying closer to terrain and to other aircraft. This is a recipe for midair collisions and inadvertent entry into clouds, which has proven to be extremely dangerous with fatal consequences.

Please consider alternatives to your approach to limit environmental impact that puts safety first.

Correspondence ID:	443 Project: 103522 Document: 118739
Name:	Romero, Julia
Received:	Mar,23 2022 13:26:04
Correspondence Type:	Web Form

Correspondence: Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	444	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,23 2022 13:27:28		
Correspondence Type:	Web Form		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support. Received:

Correspondence Type:

Mar,23 2022 13:29:38

Web Form

Correspondence: Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Correspondence ID:	446 Project: 103522 Document: 118739
Name:	Chell, Jennifer
Received:	Mar,23 2022 13:30:32
Correspondence Type:	Web Form

Correspondence: As a handicapped woman, I'd have been unable to visit and enjoy Volcanoes National Park. Flying over the lava vents in an open-air helicopter was the reason my husband and I traveled to Hilo from Oahu. Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. I sincerely encourage you to rethink such restrictive policies. Not only will it harm the tourism capital spent in your state, but it would harm individual business owners.

Thank you for your consideration.

Correspondence ID:	447	Project: 103522 Document:	118739
Name:	Amstutz, Marcel		
Received:	Mar,23 2022 13:32:07		
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	448	Project: 103522 Document:	118739
Name:	Stovall,	Sandra A	
Received:	Mar,23	2022 13:32:20	
Correspondence Type:	Web Fo	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	449	Project: 103522 Document:	118739
Name:	Rojas,	Reuben	
Received:	Mar,2	3 2022 13:35:59	
Correspondence Type:	Web F	form	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	450 Project: 103522 Document: 118739
Name:	Leckie, Annette
Received:	Mar,23 2022 13:37:42
Correspondence Type:	Web Form

Correspondence: I wanted to share my concern about proposals by the National Park Service for Hawaii Volcanoes National Park. Many of these measures could effectively eliminate air tours over the park and may even introduce unsafe policies for pilots. These proposals target a vital part of the Island's economy and reduce the accessibility of public spaces.

• Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the

operations that air-tour companies directly support.

• Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit.

• Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for the opportunity to comment. I urge you to consider Hawaii's air-tour operator concerns and how the HVNP proposals would affect communities, flight safety, the state's economy and park accessibility.

Correspondence ID:	451 Project: 103522 Document: 118739
Name:	Smith, Ellen M
Received:	Mar,23 2022 13:37:52
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need the flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy, and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	452 Project: 103522 Document: 118739
Name:	Montemurro, Ryan J
Received:	Mar,23 2022 13:39:38
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	453	Project: 103522 Document:	118739
Name:	V, Hee	ctor	
Received:	Mar,2	3 2022 13:42:58	
Correspondence Type:	Web F	Form	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Correspondence ID:	454 Project: 103522 Document: 118739
Name:	Valk, Edzard
Received:	Mar,23 2022 13:43:03
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Correspondence ID:	455	Project: 103522 Document:	118739
Name:	STRIC	CK, CYNTHIA	
Received:	Mar,2	3 2022 13:45:30	
Correspondence Type:	Web F	form	

Correspondence: am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	456	Project: 103522 Document:	118739
Name:	, Jonat	han	
Received:	Mar,23	3 2022 13:47:55	
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	457 Project: 103522 Document: 118739
Name:	Malone, Kenneth A
Received:	Mar,23 2022 13:50:39
Correspondence Type:	Web Form

Correspondence: Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. i believe air tours are the best and most environmentally friendly way to experience the parks and and all of Hawaii.

Name:		Ceresnakova, Eva
Received:		Mar,23 2022 13:50:59
Correspondence Type:		Web Form
	с ,	

Correspondence: Air tours are a safe way to experience the park, we enjoyed a lot and we were happy to have this option. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Correspondence ID:	459 Project: 103522 Document: 118739
Name:	Jones, Eric S
Received:	Mar,23 2022 13:52:09
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	460 Project: 103522 Document: 118739	
Name:	Eddins, Jason	
Received:	Mar,23 2022 13:53:05	
Correspondence Type:	Web Form	

Correspondence: Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. This is a valuable service to visitors and an important business to the islands that should not be limited any further.

Correspondence ID:	461	Project: 103522 Document:	118739
Name:	King, L	inda	
Received:	Mar,23	2022 13:55:17	
Correspondence Type:	Web Fo	orm	

Correspondence: Please do not change already exiting regulations for air flights over Hawaii National Parks. All the pilots we have the pleasure to work with are extraordinarily competent and safety conscious. They are highly regulated already. The pilots that we have dealt with always have passenger safety first. Thank you

Correspondence ID:	462 Project: 103522 Document: 118739
Name:	Leroux, Jordan
Received:	Mar,23 2022 13:55:23
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated

Correspondence ID:	463	Project: 103522 Document:	118739	
Name:	Hayes, Krista			
Received:	Mar,23 2022 13:56:26			
Correspondence Type:	Web F	form		

Correspondence: Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Correspondence ID:	464 Project: 103522 Document: 118739
Name:	Moeller, Barbara
Received:	Mar,23 2022 13:56:26
Correspondence Type:	Web Form

Correspondence: A friend and I visited Hawaii a few years ago and were able to take a helicopter tour around the volcano area as well as the waterfalls. I was most interested in the past lava flows and tubes. It was a pleasant surprise to new vegetation growing in old lava flow area. This is a view and trip that cannot be taken on foot. It is a wonderful educational trip, and I would do it again if I have the privilege to visit Hawaii again.

Correspondence ID:	465 Project: 103522 Document: 118739
Name:	Patel, Dhruvin
Received:	Mar,23 2022 13:56:55
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly

regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	466	Project: 103522 Document:	118739	
Name:	Ingweiler, Jacquelyn			
Received:	Mar,23 2022 13:57:25			
Correspondence Type:	Web F	orm		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	467 Project: 103522 Document: 118739		
Name:	Kumar, Vikram		
Received:	Mar,23 2022 13:58:30		
Correspondence Type:	Web Form		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support. Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	468 Project: 103522 Document: 118739
Name:	Bloch, Douglas
Received:	Mar,23 2022 13:59:03
Correspondence Type:	Web Form

Correspondence: Our helicopter tour of the big island was one of the hi-lights of our Hawaii vacation. I am concerned about the new regulations being considered. All four of the passengers felt safe and secure during our flight. It greatly nuanced our experience and would not hesitate to take another helicopter tour, provided it was not restricted in scope, duration or airspace. Please do not go forward with the ATMP alternatives proposed.

Thank you

Correspondence ID:	469 Project: 103522 Document: 118739
Name:	Robinson, Nancy A
Received:	Mar,23 2022 14:00:32
Correspondence Type:	Web Form

Correspondence: Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

I am personally aware of helicopter flight safety. As a registered nurse, I spent 8 years as a Life Flight nurse. We were responsible for safety in and around the helicopter. I traveled to the big island with my sister when we were able to enjoy our 3 hour tour with Paradise Helicopter tours. We enjoyed it so much we took a second flight when we then visited Kauahi. Both flights provided exceptional views of both islands.

Thank you, Nancy Robinson

Correspondence ID:	470 Project: 103522 Document: 118739
Name:	Robinson, Nancy A
Received:	Mar,23 2022 14:00:35
Correspondence Type:	Web Form

Correspondence: Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

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Thank you, Nancy Robinson

Correspondence ID:	471	Project: 103522 Document:	118739	
Name:	England, David			
Received:	Mar,23 2022 14:00:35			
Correspondence Type:	Web F	orm		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy, and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	472 Project: 103522 Document: 118739			
Name:	Shinn,			
Received:	Mar,23 2022 14:01:04			
Correspondence Type:	Web Form			

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Correspondence ID:	473	Project: 103522 Document:	118739
Name:	Reinh	ardus, Dave	
Received:	Mar,2	3 2022 14:02:24	
Correspondence Type:	Web F	form	

Correspondence: Good Afternoon,

I have been made aware of possible changes to the air tours by the National Park Service for Hawaii Volcanoes National Park (HVNP) and I would like to comment on the ATMP alternatives proposed. As I have been informed, many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Viewing the park from the air allows one to see its vastness and contributes to the understanding of the ecosystem in a way a ground tour cannot. Understanding the effect that lava flows have had on the environment cannot be truly understood unless seen from both the micro view of ground based tours and the macro view from the air. My understanding and appreciation of the events that shaped and continue to shape the island were greatly expanded by being able to view from both lenses. Please continue to allow the air tours and circling of the open lava flows that allow the park to shine in all of its splendor. Sincerely,

Dave Reinhardus

Correspondence ID:	474	Project: 103522 Document:	118739
Name:	COOK	X, WILLIAM	
Received:	Mar,2	3 2022 14:02:34	
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Correspondence ID:	475	Project: 103522 Document:	118739
Name:	Peterser	n, Anthony J	
Received:	Mar,23	2022 14:02:34	
Correspondence Type:	Web Fo	rm	

Correspondence: Memories that last a lifetime!!!! Enough said!!!! Priceless!!!

Correspondence ID:	476 Project: 103522 Document: 118739		
Name:	Campbell, Alexander		
Received:	Mar,23 2022 14:04:29		
Correspondence Type:	Web Form		

Correspondence: As someone who has enjoyed air tours over the park, and an experienced helicopter pilot... PLEASE PROTECT OUR PARKS! I understand the hardship that businesses will experience from increased regulation is not insignificant, but that pales in comparison to the continual erosion of an irreplaceable landmark. I have seen the slow decline of the parks in my short lifetime, and encourage the strongest measures to protect our parks.

Correspondence ID:	477 Project: 103522 Document: 118739
Name:	Scalzo, Gene
Received:	Mar,23 2022 14:05:48
Correspondence Type:	Web Form

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plans for Hawaii Volcanoes National Park.

I have serious concerns with the development process of the Air Tour Management Plans (ATMP) by the National Park Service (NPS) and the Federal Aviation Administration (FAA). NPS and the FAA have ignored 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. Excluding the NPOAG from providing input on the ATMP process is in direction contradiction of FAA Order No. 1110.138A.

NPS does not have the necessary expertise to fundamentally redesign the airspace over these parks. The ATMPs proposed by NPS would relocate, constrict, and combine flight routes and would make substantial changes to flight altitudes. The current flight routes and altitudes have been in place for years and are well understood by industry. The changes proposed by ATMP have severe aviation safety implications that should have been deliberated in the NPOAG, as Congress intended in the National Parks Air Tour Management Act of 2000.

The proposals currently under consideration will force aircraft into potentially unsafe flight conditions. The NPS has proposed increasing the minimum flight altitude over Hawaii Volcanoes National Park from an allowed minimum 500 feet AGL to 1,500 feet AGL, which does not provide adequate safe options for navigation in typical weather patterns that exist in the park. Even more concerning is that the proposals have fixed narrow flight routes that do not take into account the areas constantly changing weather patterns.

I also have serious concerns with the economic impact these plans will have on helicopter air tour companies. The draft plans' flight allocation numbers do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change and NPS needs to respect that dynamic, as visitors alter their destinations according to those trends.

The NPS has failed to reach out to the operators to enquire what economic impacts might arise implementing a management plan that restricts overflights. Operators are already suffering economically post COVID-19, loosing over 80% of their businesses due to the shutdown of international travel. Further restrictions will cripple an already fragile industry trying to rebuild.

In 2020, Hawaii Volcanoes National Park welcomed 590,000 visitors, a 57% decrease from 2019 when the park welcomed over 1,300,000 visitors. This year many National Parks saw their resources strained by the large number of visitors as the public began to travel again. Air tours are an important option for many visitors conducting a one-in-a-lifetime trip to see famous natural landmarks. Visitors taking advantage of air tours benefit by avoiding traffic, wait times, and walking trails that are inaccessible for the handicapped or elderly, while reducing congestion and demand on park infrastructure.

Like ground-based tours, air tours are a valid part of our visitor experience, providing a unique window from which we can share our cultural, historical and environmental sites with the world. Air tours require no ground-based infrastructure at the park, which allows visitors accessibility without the need for roads, trails, signs, bathrooms, garbage cans, or other services.

By further restricting an already limited number of allowable air tours, we are reducing opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance. Through carbon-offset efforts and strict altitude requirements to control noise just to name a few efforts air-tour operators are working to ensure they are responsi

Correspondence ID:	478	Project: 103522 Document:	118739
Name:	Sites, Dr	:. Jimmy C	
Received:	Mar,23 2	2022 14:06:31	
Correspondence Type:	Web For	rm	

Correspondence: Greetings. My name is Jimmy Sites and I produce and host the national prime time TV series Spiritual Outdoor Adventures with Jimmy Sites. Several years ago we produced a highly-rated episode on the Big Island of Hawaii. During that episode we showcased the Hawaii Volcanoes National Park and utilized the services of a wonderful tour company called Paradise Helicopters. I have used such services literally all over the world, and my summary is that this company has top-of-the-line safety guidelines and safety protocols. After viewing your proposed Air Tour Management Plan (ATMP) for Hawaii Volcanoes National Park, I am concerned that it is overly restrictive and will constrain access to our public spaces. The plan seems to reduce pilot options that are needed to fly safely to avoid volcanic activity, weather, and other aircraft. These pilots are already strictly regulated on the number of flights and altitudes at which they can fly. If this plan is passed, I think a strong potential exists that some excellent longtime touring businesses on the Island of Hawaii will have to close permanently. I hope you will reconsider and revise the ATMP to protect these companies, and make it possible for the general public the continue to enjoy these amazing natural resources and parks.

Thank you for your consideration of this matter.

Sincerely, Dr. Jimmy Sites

Correspondence ID:	479	Project: 103522 Document:	118739
Name:	Elgart,	Steven	
Received:	Mar,2	3 2022 14:07:51	
Correspondence Type:	Web F	orm	

Correspondence: I flew as a passenger in a 2.5 helicopter tour of Hawai'i Volcanoes National Park several years ago. It was the premier experience of my trips to Hawai'i. I arranged for the front seat next to the pilot. In order to safely show the volcano area and other areas of the island it was necessary for the pilot to make decisions based on conditions that day. These volcano and weather conditions could change on short notice. While the NPS should have an ATMP, it is essential that policy facilitate experienced pilots and service firms in making the immediate daily decisions necessary to safely transport their passengers while visiting the Park. These firms provide safe access to a Park experience which isn't possible by surface vehicle, and which could be unsafe and should be discouraged on foot. I strongly encourage development of an ATMP which enhances the service firms' ability to continue providing the visitor experience which has been available for many years.

Correspondence ID:	480	Project: 103522 Document:	118739
Name:	Martin	, Dana	
Received:	Mar,23	3 2022 14:11:13	
Correspondence Type:	Web F	orm	

Correspondence: Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

## DO NOT IMPOSE MORE REGULATIONS.

Correspondence ID:	481 Project: 103522 Document: 118739		
Name:	Kenkel, Laura		
Received:	Mar,23 2022 14:12:30		
Correspondence Type:	Web Form		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	482 Project: 103522 Document: 118739
Name:	Greving, Hendrik
Received:	Mar,23 2022 14:12:35
Correspondence Type:	Web Form

Correspondence: Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

Air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Correspondence ID:	483	Project: 103522 Document:	118739
Name:	Schwer	in, Jim	
Received:	Mar,23	2022 14:13:37	
Correspondence Type:	Web Fo	orm	
Correspondence: I support the proposed restr	ictions o	on air tours. They have been a nui	isance for many years.

Thank you

Correspondence ID:	484 Project: 103522 Document: 118739		
Name:	Freeman, Scotty L		
Received:	Mar,23 2022 14:14:26		
Correspondence Type:	Web Form		

Correspondence: Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

As the retired fire chief for US Army Hawaii. I would like to express my concern over the possible loss of some of the services provide by Air Tour companies. Most of the companies are under contract to assist firefighting efforts on Military facilities in Hawaii. These extremely competent and experienced pilots use their aircraft to do precision "Bambi Bucket" drops on fires in support of firefighters on the ground. These firefighting efforts are essential to protecting Endangered Species, Animals as well as Archeological sensitive sites, not to mention the lives of fire crews on the ground. Increased regulatory requirement could force some of these businesses to close their doors and leave the firefighters without a valuable asset.

Correspondence ID:	485	Project: 103522 Document:	118739
Name:	White,	Edward R	
Received:	Mar,23	2022 14:14:43	
Correspondence Type:	Web Fo	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Received:

Mar,23 2022 14:17:12

Correspondence Type:

Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Correspondence ID:	487	Project: 103522 Document:	118739
Name:	Merritt, Kimberly A		
Received:	Mar,23 2022 14:18:57		
Correspondence Type:	Web F	orm	

Correspondence: After speaking with acquaintances, I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park. My experience on an air tour was such a surreal, informative, memorable way to see HVNP up close, and many of these restrictive measures would eliminate air tours over the park or introduce potentially unsafe policies for pilots. My acquaintances have informed me that Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

I'm all for National Parks doing what they need to do to preserve our country's amazing places, but am speaking out in hopes that an agreement can be reached that still allows visitors an accessible way to visit HVNP and see it from air safely. Thank you.

Correspondence ID:	488 Project: 103522 Document: 118739
Name:	Vadakin, Heidi
Received:	Mar,23 2022 14:20:50
Correspondence Type:	Web Form

Correspondence: I felt very safe on my helicopter flight. It was my first flight in a chopper and I did not know what to expect. The pilots put safety first of its occupants. I would love to go up again some day in the future to enjoy the beauty from a different perspective. It is important for people to learn and appreciate the beauty so the islands will be respected and taken care of for future generations.

Received:

Correspondence Type:

Mar,23 2022 14:21:26

Web Form

Correspondence: Enjoying the island by flight is the safest and least intrusive way to explore.

Correspondence ID:	490	Project: 103522 Document:	118739
Name:	Field,	Tracy A	
Received:	Mar,2	3 2022 14:21:45	
Correspondence Type:	Web I	Form	

Correspondence: As a visitor to Hawaii, I was fortunate enough to have had the ability to see the amazing scenery via helicopter. It was truly breathtaking, and something I would not have been able to accomplish or have the same perspective of from the ground.

I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	491 Project: 103522 Document: 118739
Name:	Cortese, Loralee T
Received:	Mar,23 2022 14:25:38
Correspondence Type:	Web Form

Correspondence: Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Correspondence ID:	492         Project: 103522 Document:         118739	
Name:	Pasos, Mark	
Received:	Mar,23 2022 14:29:41	
Correspondence Type:	Web Form	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Correspondence ID:	493	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,23	3 2022 14:31:15	
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	494 Project: 103522 Document: 118739
Name:	Johnson, Rita M
Received:	Mar,23 2022 14:36:21
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours

over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

• Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.
Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	495         Project: 103522         Document:         118739
Name:	rader, ed
Received:	Mar,23 2022 14:36:44
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	496 Project: 103522 Document: 118739	
Name:	Trial, Nicholas G	
Received:	Mar,23 2022 14:37:47	
Correspondence Type:	Web Form	

Correspondence: Hello,

I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support. Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	497	Project: 103522 Document:	118739
Name:	, Steffi		
Received:	Mar,23	3 2022 14:39:34	
Correspondence Type:	Web F	orm	

Correspondence: Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

My helicopter tour over the volcanoes was an absolut highlight during my 4 weeks vaccational trip of Hawaii and I recommend it to all friends to do so. It would bw a pitty if you make it impossible due to regolations on the wrong side.

Correspondence ID:	498	Project: 103522 Document:	118739
Name:	, David	l	
Received:	Mar,23	3 2022 14:39:50	
Correspondence Type:	Web F	orm	

Correspondence: Many of these restrictive measures would effectively eliminate air tours over the park. Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators.

Correspondence ID:	499 Project: 103522 Document: 118739
Name:	Heineman, John
Received:	Mar,23 2022 14:40:37
Correspondence Type:	Web Form

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plans for Hawaii Volcanoes National Park.

I have serious concerns with the development process of the Air Tour Management Plans (ATMP) by the National Park Service (NPS) and the Federal Aviation Administration (FAA). NPS and the FAA have ignored 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. Excluding the NPOAG from providing input on the ATMP process is in direction contradiction of FAA Order No. 1110.138A.

NPS does not have the necessary expertise to fundamentally redesign the airspace over these parks. The ATMPs proposed by NPS would relocate, constrict, and combine flight routes and would make substantial changes to flight altitudes. The current flight routes and altitudes have been in place for years and are well understood by

industry. The changes proposed by ATMP have severe aviation safety implications that should have been deliberated in the NPOAG, as Congress intended in the National Parks Air Tour Management Act of 2000.

The proposals currently under consideration will force aircraft into potentially unsafe flight conditions. The NPS has proposed increasing the minimum flight altitude over Hawaii Volcanoes National Park from an allowed minimum 500 feet AGL to 1,500 feet AGL, which does not provide adequate safe options for navigation in typical weather patterns that exist in the park. Even more concerning is that the proposals have fixed narrow flight routes that do not take into account the areas constantly changing weather patterns.

I also have serious concerns with the economic impact these plans will have on helicopter air tour companies. The draft plans' flight allocation numbers do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change and NPS needs to respect that dynamic, as visitors alter their destinations according to those trends.

The NPS has failed to reach out to the operators to enquire what economic impacts might arise implementing a management plan that restricts overflights. Operators are already suffering economically post COVID-19, loosing over 80% of their businesses due to the shutdown of international travel. Further restrictions will cripple an already fragile industry trying to rebuild.

In 2020, Hawaii Volcanoes National Park welcomed 590,000 visitors, a 57% decrease from 2019 when the park welcomed over 1,300,000 visitors. This year many National Parks saw their resources strained by the large number of visitors as the public began to travel again. Air tours are an important option for many visitors conducting a one-in-a-lifetime trip to see famous natural landmarks. Visitors taking advantage of air tours benefit by avoiding traffic, wait times, and walking trails that are inaccessible for the handicapped or elderly, while reducing congestion and demand on park infrastructure.

Like ground-based tours, air tours are a valid part of our visitor experience, providing a unique window from which we can share our cultural, historical and environmental sites with the world. Air tours require no ground-based infrastructure at the park, which allows visitors accessibility without the need for roads, trails, signs, bathrooms, garbage cans, or other services.

By further restricting an already limited number of allowable air tours, we are reducing opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance. Through carbon-offset efforts and strict altitude requirements to control noise just to name a few efforts air-tour operators are working to ensure they are responsi

Correspondence ID:	500 Project: 103522 Document: 118739
Name:	Laetner, Christian
Received:	Mar,23 2022 14:41:08
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). I have been advised that many of these restrictive measures could effectively eliminate air tours over the park, unfairly targeting an important part of the Hawaii's economy and reduce access to public spaces.

We have taken Hawaian air tours and recognize that they leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. Lets go Brandon! The Krama of stupid decisions will come back to haunt your left leaning island.

Please withold any personally identifying information I have provided. Thanks.

Name:

,

Received:

Mar,23 2022 14:43:26

Correspondence Type:

Web Form

Correspondence: Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Correspondence ID:	502         Project: 103522         Document:         118739			
Name:	Baublitz, Nancy			
Received:	Mar,23 2022 14:43:34			
Correspondence Type:	Web Form			

Correspondence: We had a lovely flight over the volcanos this past February with Paradise Flights. The pilot of the helicopter was very informative & amp; he was clearly passionate about his state, Hawaii. It would be a mistake to hinder these companies by rules and regulation that may cause their demise.

Correspondence ID:	503         Project: 103522         Document:         118739			
Name:	Baublitz, Nancy			
Received:	Mar,23 2022 14:43:34			
Correspondence Type:	Web Form			

Correspondence: We had a lovely flight over the volcanos this past February with Paradise Flights. The pilot of the helicopter was very informative & amp; he was clearly passionate about his state, Hawaii. It would be a mistake to hinder these companies by rules and regulation that may cause their demise.

Correspondence ID:	504         Project: 103522 Document:         118739		
Name:	Vesel, Richard W		
Received:	Mar,23 2022 14:47:27		
Correspondence Type:	Web Form		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country.

I have experienced air tours as a passenger participant and photographer, as well as a hiker on Park Trails. The air tours were exceptional opportunities to see and photograph the volcanoes, coastline lava flows, and the rain forests and waterfalls. During hiking, I never found the air traffic to be too noisy or disturbing. In fact, my experiences were that the overflights were quite quiet, and would generally not be perceptible unless you were also looking at the flight vehicle.

The promotion and adoption of Quiet Technology is certainly going in the right direction, and my own personal "design" of a program would be simple: permit overflight paths per the current policies and regulations, limit total overflights to 12,000 per year, allow for a few (3-6) Special Event days per year, and one quiet day per week (Sunday) where no overflights are to take place. Restriction of tour flight hours from 9AM to 6PM on operational days would also be reasonable and practical.

As they stand, the stated alternative proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	505 Project: 103522 Document: 118739			
Name:	Ciarletta, David M			
Received:	Mar,23 2022 14:48:38			
Correspondence Type:	Web Form			

Correspondence: Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

I have extremely valuable personal memories of my air tour. I would be very sad to learn that new regulations will restrict the safest way to view the volcanoes and the rest of the island. We never felt unsafe in the least bit.

Thank you, Dave Ciarletta

Correspondence ID:	506	Project: 103522 Document:	118739	
Name:	Berg, Joshua			
Received:	Mar,23 2022 14:49:09			
Correspondence Type:	Web F	orm		

Correspondence: I'm not in favor of anything that further restricts or regulates helicopter flights around Volcano National Park. We were extremely nervous for our ride we took back in 2014 and our pilot was absolutely fantastic. If they claim that government regulations will force them to be less safe then I trust them explicitly. We are due to come back next year and I will not support any further government regulation on this matter.

Correspondence ID:	507	Project: 103522 Document:	118739	
Name:	Fong, Aaron			
Received:	Mar,23 2022 14:50:54			
Correspondence Type:	Web F	orm		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or

restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	508	Project: 103522 Document:	118739	
Name:	D, Cheryl			
Received:	Mar,23 2022 14:54:19			
Correspondence Type:	Web F	Form		

Correspondence: uggested comments:

I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Correspondence ID:	509	Project: 103522 Document:	118739	
Name:	,			
Received:	Mar,23 2022 14:54:41			
Correspondence Type:	Web F	form		

Correspondence: I am writing from the perspective of a former tourist who has availed myself of a tour over the volcanoes. I believe I understand the reasons for implementing the restrictions on flyovers, but your arguments for doing so are weak.

My wife and i thoroughly enjoyed our flight, and I was very impressed by the level of communication and coordination among the pilots of other craft in the area, which facilitated our being exposed to much more on our tour. It provided us with a greater appreciation of the land and culture of Hawai'i.

I do not believe any of your proposals will satisfy everyone, nor do I think one is possible. I do feel that the operators are being short-changed. Perhaps another round of planning meetings with ALL affected subjects would provide a more equitable proposal.

Correspondence ID:	510 Project: 103522 Document: 118739
Name:	Locken, Craig M
Received:	Mar,23 2022 14:54:54
Correspondence Type:	Web Form

Correspondence: We really enjoyed our helicopter ride, even though we did not get to view the volcanoes. It was cloudy the day of our ride. So, we want to make sure that when we go back, we still have the option to try again.

Correspondence ID:	511	Project: 103522 Document:	118739		
Name:	Schott, Michael				
Received:	Mar,23 2022 14:57:34				
Correspondence Type:	Web F	orm			

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Thank you for this opportunity to comment. Michael Schott

Correspondence ID:	512	Project: 103522 Document:	118739	
Name:	,			
Received:	Mar,23 2022 14:58:32			
Correspondence Type:	Web Form			

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	513	Project: 103522 Document:	118739	
Name:	Thompson, Kay L			
Received:	Mar,23 2022 15:00:56			
Correspondence Type:	Web Fe	orm		

Correspondence: Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. The tour we did was the highlight of our trip to Hawaii.

Correspondence ID:	514	Project: 103522 Document:	118739
Name:	D, C		
Received:	Mar,2	3 2022 15:02:50	
Correspondence Type:	Web F	form	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Correspondence ID:	515	Project: 103522 Document:	118739
Name:	D, C		
Received:	Mar,23 2022 15:02:51		
Correspondence Type:	Web Form		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Correspondence ID:	516	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,2	3 2022 15:03:18	
Correspondence Type:	Web F	form	

Correspondence: Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly,

and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Correspondence ID:	517	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,2	3 2022 15:04:20	
Correspondence Type:	Web F	form	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Correspondence ID:	518	Project: 103522 Document:	118739
Name:	Black, Lisa		
Received:	Mar,23 2022 15:06:52		
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

• Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.
Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect the Hawaiian helicopter tours that teach us so much about the formation and history of the islands.

Sincerely, Lisa Black

Correspondence ID:	519	Project: 103522 Document:	118739
Name:	Flatt, I	Robert	
Received:	Mar,2	3 2022 15:07:11	
Correspondence Type:	Web F	Form	

Correspondence: I support restrictions on air tours proposed by the National Park Service for Hawaii Volcanoes National Park.

Air tours create a sound footprint which disturbs the experience of the Park for other users, and disturbs residents of nearby communities.

Air tours provide no incremental benefit as the Park is accessible without these tours.

Correspondence ID:	520 Project: 103522 Document: 118739		
Name:	Erickson, Deborah		
Received:	Mar,23 2022 15:19:23		
Correspondence Type:	Web Form		

Correspondence: Like many other visitors to Hawaii, I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The air tour we took was fantastic, and one of our favorite memories now. Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. This reason should be your highest consideration -- the pilot should always be able to decide the safest route.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	521	Project: 103522 Document:	118739
Name:	Bradley, Stephen		
Received:	Mar,23 2022 15:22:11		
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

I fully endorse the above

Rgs Stephen Bradley

Name:	Wolf, Denise L
Received:	Mar,23 2022 15:23:56
Correspondence Type:	Web Form

Correspondence: An air tour is a once in a lifetime experience that I had had planned for years. Why would you further restrict the pilots to potentially have to make maneuvers that may compromise safety?!

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Correspondence ID:	523 Project: 103522 Document: 118739
Name:	Ball, Cecilia
Received:	Mar,23 2022 15:34:20
Correspondence Type:	Web Form

Correspondence: I feel the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP) are overly restrictive.

Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

One of my "must do" things when I visit the "Big Island is to take a helicopter ride. I have found helicopter companies to be exceedingly careful in their work making me feel safe at all times.

Please consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect Hawaiian communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Thank you for your consideration.

Correspondence ID:	524 Project: 103522 Document: 118739		
Name:	Thompson, Pam		
Received:	Mar,23 2022 15:38:18		
Correspondence Type:	Web Form		

Correspondence: Aloha,

Please don't stop the helicopters from flying over the volcano. It is an amazing site, and all the world should be able to see it.

Correspondence ID:	525	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,23 2022 15:44:26		
Correspondence Type:	Web I	Form	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

Air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	526	Project: 103522 Document:	118739
Name:	Hantzi, Sue		
Received:	Mar,23 2022 15:55:31		
Correspondence Type:	Web F	orm	

Correspondence: I have personally flown with local company Paradise Helicopters and consider them a safe, reliable and meticulous well maintained company/organisation.

I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	527	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,23 2022 16:01:08		
Correspondence Type:	Web Form		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Correspondence ID:	528 Project: 103522 Document: 118739		
Name:	Beilfuss, Chris		
Received:	Mar,23 2022 16:07:53		
Correspondence Type:	Web Form		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. I have been on a few of these tour where we experienced turbulent weather or a sudden weather shift. Pilots had to either change altitudes or reroute their flight pattern to keep us safe. I ask you to please listen to the pilots that fly these tours and take heed to their warnings.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	529 Project: 103522 Document: 118739		
Name:	Tedesco, Chris		
Received:	Mar,23 2022 16:11:15		
Correspondence Type:	Web Form		

Correspondence: The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Name:	Gizzie, Anthony
Received:	Mar,23 2022 16:11:57
Correspondence Type:	Web Form

Correspondence: Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

Correspondence ID:	531         Project: 103522         Document:         118739	
Name:	DiVincenti, Louis	
Received:	Mar,23 2022 16:13:09	
Correspondence Type:	Web Form	

Correspondence: Hello - I write to voice my support for limiting use of helicopters around Volcanoes National Park. My wife and I recently visited the park, and we did, in fact, take a helicopter tour. It was great, and provided a really unique overview. However, afterwards, we actually visited the park in person, and found the near constant buzz of helicopters to distract from the beauty and serenity of the park. Enacting restrictions that still allow use of the park by helicopters but limit the effect of helicopters on park visitors is advisable.

Sincerely,

Louis DiVincenti Jr

Correspondence ID:	532	Project: 103522 Document:	118739
Name:	conley, gb		
Received:	Mar,23 2022 16:15:25		
Correspondence Type:	Web F	orm	

Correspondence: I felt perfectly safe flying over the volcano's destruction & amp; fumes My pilot was excellent

The only reason for my flight was to witness first hand the damage from the volcano

To restrict flights over the volcano's damage would destroy any personal knowledge of what I witnessed.

**GB** Conley

Correspondence ID:	533         Project: 103522         Document:         118739		
Name:	Bergman, Quinn		
Received:	Mar,23 2022 16:20:35		
Correspondence Type:	Web Form		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated

Correspondence ID:	534	Project: 103522 Document:	118739
Name:	Sunday, Kevin		
Received:	Mar,23	3 2022 16:28:20	
Correspondence Type:	Web F	orm	

Correspondence: The Paradise Helicopters tour that we took in 2017 was by far the highlight of our 10 days touring the magnificent Hawaiian islands. Flying over the lava fields and volcanic caldron was absolutely spectacular. Seeing majestic waterfalls that are not accessible by land was icing on the cake.

I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	535 Project: 103522 Document: 118739		
Name:	Dolleris, Casper		
Received:	Mar,23 2022 16:40:32		
Correspondence Type:	Web Form		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	536	Project: 103522 Document:	118739
Name:	Hatcher, Tanya		
Received:	Mar,23 2022 16:41:50		
Correspondence Type:	Web Fo	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Correspondence ID:	537	Project: 103522 Document:	118739
Name:	, Lauren		
Received:	Mar,23 2022 16:52:01		
Correspondence Type:	Web Form		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

Air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	538         Project: 103522         Document:         118739
Name:	Mueller, Amiee
Received:	Mar,23 2022 16:53:06
Correspondence Type:	Web Form

Correspondence: Thank you for this opportunity to comment. I've been to Hawaii Volcanoes National Park a few times. On my first visit, we did a helicopter tour. It was the highlight of that visit. It would be sad to learn that visitors couldn't have the same experience due to new regulations...especially minimum altitudes or routes that would restrict viewing or cause safety concerns. So, please consider both the traveler's experience as well as the pilots & amp; businesses who provide these tours while you are considering what's best for the land and residents. I'm sure you can come to a decision that is best for all parties and not unnecessarily favored or detrimental to any party.

Correspondence ID:	539	Project: 103522 Document:	118739
Name:	Rodrig	guez, Melissa	
Received:	Mar,2	3 2022 16:56:02	
Correspondence Type:	Web F	orm	

Correspondence: We have flown with Sunshine on numerous occasions. Each trip was a highlight of our vacation in the islands. I have always felt the pilots did everything in their power to ensure our safety. It would be a travesty to limit these pilot's discretion or even more so to ground them permanently

Correspondence ID:	540	Project: 103522 Document:	118739
Name:	Horst, J	ferald	
Received:	Mar,23	2022 17:09:31	
Correspondence Type:	Web Fo	orm	

Correspondence: NPS is practicing overzealous bureaucratic overreach again. The same tendencies of the agency that make it a functioning steward of our treasures are making it into a tool of the narrow-minded environmental lobby. My wife and I participated in an air tour of Hawaii two years ago and it was by far the most scenic and education thing we did on our trip which lasted 32 days and covered 4 islands.

Our pilot was careful to stay above the mandated height and to not create disturbances. He had to explain this to us when we made certain requests. We are 75 years old and own public resources as well as the hiker type environmental radicals that want to control our access for their holy communion with nature.

Bottom line: Don't fuck with these air tour people. They are highly professional and competent. If you have so much idle time perhaps congress should reduce your funding.

You know, I travel a lot and I am beginning to develop a good deal of animosity towards NPS. All my personal experiences are becoming increasingly negative.

Back Down.

Correspondence ID:	541 Project: 103522 Document: 118739
Name:	Butler, Brian J
Received:	Mar,23 2022 17:10:46
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	542 Project: 103522 Document: 118739
Name:	Fan, Jimmy
Received:	Mar,23 2022 17:14:08
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	543         Project: 103522         Document:         118739
Name:	Wallace, James R
Received:	Mar,23 2022 17:14:20
Correspondence Type:	Web Form

Correspondence: I'm concerned with the added policy, that local businesses could be adversely affected.

Correspondence ID:	544         Project: 103522         Document:         118739
Name:	Wallace, James R
Received:	Mar,23 2022 17:14:20
Correspondence Type:	Web Form

Correspondence: I'm concerned with the added policy, that local businesses could be adversely affected.

Correspondence ID:	545	Project: 103522 Document:	118739
Name:	Rosett	, Chynna	
Received:	Mar,2	3 2022 17:15:53	
Correspondence Type:	Web F	orm	

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plans for Hawaii Volcanoes National Park.

I have serious concerns with the development process of the Air Tour Management Plans (ATMP) by the National Park Service (NPS) and the Federal Aviation Administration (FAA). NPS and the FAA have ignored 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. Excluding the NPOAG from providing input on the ATMP process is in direction contradiction of FAA Order No. 1110.138A.

NPS does not have the necessary expertise to fundamentally redesign the airspace over these parks. The ATMPs proposed by NPS would relocate, constrict, and combine flight routes and would make substantial changes to flight altitudes. The current flight routes and altitudes have been in place for years and are well understood by industry. The changes proposed by ATMP have severe aviation safety implications that should have been deliberated in the NPOAG, as Congress intended in the National Parks Air Tour Management Act of 2000.

The proposals currently under consideration will force aircraft into potentially unsafe flight conditions. The NPS has proposed increasing the minimum flight altitude over Hawaii Volcanoes National Park from an allowed minimum 500 feet AGL to 1,500 feet AGL, which does not provide adequate safe options for navigation in typical weather patterns that exist in the park. Even more concerning is that the proposals have fixed narrow flight routes that do not take into account the areas constantly changing weather patterns.

I also have serious concerns with the economic impact these plans will have on helicopter air tour companies. The draft plans' flight allocation numbers do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change and NPS needs to respect that dynamic, as visitors alter their destinations according to those trends.

The NPS has failed to reach out to the operators to enquire what economic impacts might arise implementing a management plan that restricts overflights. Operators are already suffering economically post COVID-19, loosing over 80% of their businesses due to the shutdown of international travel. Further restrictions will cripple an already fragile industry trying to rebuild.

In 2020, Hawaii Volcanoes National Park welcomed 590,000 visitors, a 57% decrease from 2019 when the park welcomed over 1,300,000 visitors. This year many National Parks saw their resources strained by the large number of visitors as the public began to travel again. Air tours are an important option for many visitors conducting a one-in-a-lifetime trip to see famous natural landmarks. Visitors taking advantage of air tours benefit by avoiding traffic, wait times, and walking trails that are inaccessible for the handicapped or elderly, while reducing congestion and demand on park infrastructure.

Like ground-based tours, air tours are a valid part of our visitor experience, providing a unique window from which we can share our cultural, historical and environmental sites with the world. Air tours require no ground-based infrastructure at the park, which allows visitors accessibility without the need for roads, trails, signs, bathrooms, garbage cans, or other services.

By further restricting an already limited number of allowable air tours, we are reducing opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance. Through carbon-offset efforts and strict altitude requirements to control noise just to name a few efforts air-tour operators are working to ensure they are responsi

Mar,23 2022 17:17:37

Correspondence Type:

Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Services for Hawaii Volcanoes National Park. These proposals unfairly taget a vital part of the Island's economy and reduce the accessibility of public spaces. I have a deep love for the Hawaiin Islands and have enjoyed flying over the volcanoes with Paradise Helicopters. It is by far the best way to observe the magnificent scenery of the Islands, especially the majestic volcanoes. It is the only way to appreciate this type of landscape. My last flight was in 2018, shortly after the eruption, and I was able to take some beautiful photographs looking down into the volcano. It would be a pity to deny overseas visitors such an opportunity.

Correspondence ID:	547 Project: 103522 Document: 118739
Name:	Zdunski, Michael
Received:	Mar,23 2022 17:18:03
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	548         Project: 103522         Document:         118739
Name:	medina, Stefanie
Received:	Mar,23 2022 17:20:47
Correspondence Type:	Web Form

Correspondence: Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude

Correspondence ID:	549         Project: 103522         Document:         118739	
Name:	Eads Jr, Harveye' C	
Received:	Mar,23 2022 17:23:47	
Correspondence Type:	Web Form	

Correspondence: As a patcipant in helicopter flights in Hawaii I endorse continuing the opportunity for visitors to take advantage of this magnificent opportunity to see Hawaii. It was an opportunity me t to miss.

Correspondence ID:	550 Project: 103522 Document: 118739
Name:	Hofkamp, Susan K
Received:	Mar,23 2022 17:26:54
Correspondence Type:	Web Form

Correspondence: Putting further restrictions on flights over Kilauea and other areas will only drive away tourists, cause loss of businesses, and make it unsafe for pilots. Don't we have enough regulations as it is??

Correspondence ID:	551 Project: 103522 Document: 118739
Name:	Hofkamp, Susan K
Received:	Mar,23 2022 17:26:55
Correspondence Type:	Web Form

Correspondence: Putting further restrictions on flights over Kilauea and other areas will only drive away tourists, cause loss of businesses, and make it unsafe for pilots. Don't we have enough regulations as it is??

Correspondence ID:	552 Project: 103522 Document: 118739		
Name:	Hofkamp, Susan K		
Received:	Mar,23 2022 17:26:56		
Correspondence Type:	Web Form		

Correspondence: Putting further restrictions on flights over Kilauea and other areas will only drive away tourists, cause loss of businesses, and make it unsafe for pilots. Don't we have enough regulations as it is??

Correspondence ID:	553	Project: 103522 Document:	118739
Name:	Eichte	n, Daniel	
Received:	Mar,23 2022 17:27:03		
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	554	Project: 103522 Document:	118739
Name:	Darr,	lason	
Received:	Mar,2	3 2022 17:30:34	

Correspondence Type:

#### Web Form

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plans for Hawaii Volcanoes National Park.

I have serious concerns with the development process of the Air Tour Management Plans (ATMP) by the National Park Service (NPS) and the Federal Aviation Administration (FAA). NPS and the FAA have ignored 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. Excluding the NPOAG from providing input on the ATMP process is in direction contradiction of FAA Order No. 1110.138A.

NPS does not have the necessary expertise to fundamentally redesign the airspace over these parks. The ATMPs proposed by NPS would relocate, constrict, and combine flight routes and would make substantial changes to flight altitudes. The current flight routes and altitudes have been in place for years and are well understood by industry. The changes proposed by ATMP have severe aviation safety implications that should have been deliberated in the NPOAG, as Congress intended in the National Parks Air Tour Management Act of 2000.

The proposals currently under consideration will force aircraft into potentially unsafe flight conditions. The NPS has proposed increasing the minimum flight altitude over Hawaii Volcanoes National Park from an allowed minimum 500 feet AGL to 1,500 feet AGL, which does not provide adequate safe options for navigation in typical weather patterns that exist in the park. Even more concerning is that the proposals have fixed narrow flight routes that do not take into account the areas constantly changing weather patterns.

I also have serious concerns with the economic impact these plans will have on helicopter air tour companies. The draft plans' flight allocation numbers do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change and NPS needs to respect that dynamic, as visitors alter their destinations according to those trends.

The NPS has failed to reach out to the operators to enquire what economic impacts might arise implementing a management plan that restricts overflights. Operators are already suffering economically post COVID-19, loosing over 80% of their businesses due to the shutdown of international travel. Further restrictions will cripple an already fragile industry trying to rebuild.

In 2020, Hawaii Volcanoes National Park welcomed 590,000 visitors, a 57% decrease from 2019 when the park welcomed over 1,300,000 visitors. This year many National Parks saw their resources strained by the large number of visitors as the public began to travel again. Air tours are an important option for many visitors conducting a one-in-a-lifetime trip to see famous natural landmarks. Visitors taking advantage of air tours benefit by avoiding traffic, wait times, and walking trails that are inaccessible for the handicapped or elderly, while reducing congestion and demand on park infrastructure.

Like ground-based tours, air tours are a valid part of our visitor experience, providing a unique window from which we can share our cultural, historical and environmental sites with the world. Air tours require no ground-based infrastructure at the park, which allows visitors accessibility without the need for roads, trails, signs, bathrooms, garbage cans, or other services.

By further restricting an already limited number of allowable air tours, we are reducing opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance. Through carbon-offset efforts and strict altitude requirements to control noise just to name a few efforts air-tour operators are working to ensure they are responsi

Correspondence ID:	555	Project: 103522 Document:	118739
Name:	Griffith	ıs, Kim	
Received:	Mar,23	2022 17:33:54	
Correspondence Type:	Web Fo	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Correspondence ID:	556         Project: 103522         Document:         118739
Name:	Young, Lulu K
Received:	Mar,23 2022 17:36:18
Correspondence Type:	Web Form

Correspondence: We Love Seen the island from a helicopter no better way to enjoy Oahu Paradise helicopters as a top notch company book yours today Aloha Lulu Young

Correspondence ID:	557	Project: 103522 Document:	118739
Name:	Clifton, Richard		
Received:	Mar,23	3 2022 17:46:18	
Correspondence Type:	Web F	orm	
	1 170		

Correspondence: Leave the tour helicopters alone! If it is not broken, don't fix it. Regulations were fine the way they are.

We have flown several times and the flights are safe, controlled, and very educational. Leave things alone.

# Thank you.

Correspondence ID:	558	Project: 103522 Document:	118739
Name:	Teitzel, Geoff A		
Received:	Mar,23 2022 17:47:15		
Correspondence Type:	Web Form		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	559	Project: 103522 Document:	118739
Name:	Mizroc	h, Martha	

# Mar,23 2022 17:48:05

Correspondence Type:

# Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

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Correspondence ID:	560         Project: 103522         Document:         118739	
Name:	, Tim	
Received:	Mar,23 2022 17:49:25	
Correspondence Type:	Web Form	

Correspondence: In reference to the ATMP for Hawaii Volcanoes National Park.

I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

As someone who has enjoyed the services of Paradise Helicopters and their air tours to Hawaii Volcanoes National Park I believe any plan the jeopardises the viability of these tours or makes them less safe should not be implemented.

118739

Mar,23 2022 17:51:12

# Correspondence Type:

Correspondence: I visited the large island a few years ago and one of the highlights was our helicopter tour which was simply a wonderful experience and helped us appreciate the whole island. So, I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that airtour companies directly support.

Web Form

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Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thanks for your consideration Ken Ken

Correspondence ID:	562         Project: 103522         Document:         118739		
Name:	M Libardi, Tina		
Received:	Mar,23 2022 17:58:27		
Correspondence Type:	Web Form		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Our helicopter tour was spectacular! The pilot was very attentive to the surroundings, being careful to stay far away from whales breaching so boats / whales would not be affected. We saw lava spewing out into the ocean...a site to be only viewed by air. So amazing! We felt very safe.

Correspondence Type:

Mar,23 2022 18:06:41

Web Form

Correspondence: Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Correspondence ID:	564         Project: 103522         Document:         118739
Name:	Parsons, William
Received:	Mar,23 2022 18:14:18
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	565         Project: 103522         Document:         118739
Name:	Bradley, Chris
Received:	Mar,23 2022 18:23:42
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	566         Project: 103522         Document:         118739		
Name:	A., Ken		
Received:	Mar,23 2022 18:25:27		
Correspondence Type:	Web Form		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. These proposals needlessly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the public, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further and reduces the public's appreciation of their our spaces.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	567	Project: 103522 Document:	118739
Name:	Herrin	g, Tim J	
Received:	Mar,2	3 2022 18:32:37	
Correspondence Type:	Web F	orm	

Correspondence: My wife and I took advantage and enjoyed touring the Big Island by open door helicopter on our visit to Hawaii. It was not a spur of the moment booking, but an integral part of our. visit. I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit.

Air tours are a safe way to experience the park. Forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Out of an abundance of safety, our flight was re-booked 4 days in a row because of changing weather conditions.

If anything, some of the restrictions on air space should be reviewed as too restrictive, the pilots are responsible ambassadors of the park and the island.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated. Don't break the things that are working well for Hawaii.

Tim & amp; Carol Herring

Correspondence ID:	568	Project: 103522 Document:	118739
Name:	Adams	s, Glenn	
Received:	Mar,23	3 2022 18:37:46	
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would severely limit or eliminate air tours over the park. Additionally the proposed changes introduce potentially unsafe policies for pilots which translates to less safety for tourist passengers. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Correspondence ID:	569	Project: 103522 Document:	118739	
Name:	Overway, Steven S			
Received:	Mar,23 2022 18:48:38			
Correspondence Type:	Web F	orm		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

• Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	570	Project: 103522 Document:	118739
Name:	Whitne	y, Marc	
Received:	Mar,23	2022 18:53:00	
Correspondence Type:	Web Fo	orm	

Correspondence: I have taken a helicopter tour of the volcanic features at Hawaii Volcanoes National Park. The tour was safe. The pilot explained rules regarding altitude, avoiding toxic gases and so on. At no time did the pilot do anything I thought might be hazardous either to the environment or to to the passengers. The view from the air

is not just for thrills but is an excellent way to see the overall scale and geological relationship of the features. This level of understanding cannot be achieved from maps or on the ground.

For the record, I reside in the (currently dormant) San Francisco Volcanic Field. I've spent many hours exploring relationships between the ancient people of the region and past volcanic activity.

I urge the NPS to avoid new regulations that will restrict helicopter tours in HVNP such that this educational resource is compromised.

Correspondence ID:	571	Project: 103522 Document:	118739
Name:	Harris	, Brianna M	
Received:	Mar,23	3 2022 18:59:24	
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Brianna Harris

Correspondence ID:	572	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,2	3 2022 19:04:38	
Correspondence Type:	Web F	Form	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	73 Project: 103522 Document:	118739
Name:	rodhagen, Robert J	
Received:	ar,23 2022 19:19:37	
Correspondence Type:	eb Form	

Correspondence: Hello, As a visitor to Hawaii I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	574	Project: 103522 Document:	118739	
Name:	Merrithew, H			
Received:	Mar,2	3 2022 19:20:58		
Correspondence Type:	Web F	form		

Correspondence: Please rethink your plan to restrict airspace over the Volcano National Park on the Island Of Hawaii. Visitors, I.e., tourists, come to this island in large part to see lava and the volcano, in addition to the NP. By restricting airspace you will reduce the wonder of this natural phenomenon.

Correspondence ID:	75 Project: 103522 Document: 118739		
Name:	oung, Gwen		
Received:	Mar,23 2022 19:22:41		
Correspondence Type:	7eb Form		

Correspondence: I support the most restrictive option (#2) to best preserve the 'aina and the historic and cultural experiences and beauty of Volcanos National Park.

I have several comments of consideration:

1. Sound carries different, depending on weather / cloud cover / wind situation. Do the other options at 1500 and 2000 ft consider this effect in the routes allowed?

2. I have observed that whales, monk seals, and birds can be agitated at 1500 ft regulation levels and even lower. On the water routes of options 3 and 4 considered critical for protected species and cultural activities etc.? Hence, where does the park boundary end at the water and is this considered in the altitudes being considered?

3. In option 2, do we also consider the boundary of the park as in item 2 above?

4. Option 4 has too lenient of time slots as 8 to 5pm is really close to critical spiritual times of sunrise and sunset.

Many of these cultural practices start at sunrise and continue until 9am or even 10am and start as early as 3 or 4pm to be completed at sunset (time of year depending)

with the human activity pause due to COVID our land and sea creatures have really had a change to be reinvigorated and in some cases have a new chance to survive. These proposals will help us care for and be good 'aina stewards. We must move to be sustainable in all our actions.

Thank you again for listening and your support.

Correspondence ID:	576	Project: 103522 Document:	118739
Name:	MAN	NION, EDWARD	
Received:	Mar,2	3 2022 19:27:22	
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

•Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.
Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	577 Project: 103522 Document: 118739			
Name:	Naughten, Gabrielle			
Received:	Mar,23 2022 19:33:24			
Correspondence Type:	Web Form			

Correspondence: Thank you for allowing the community to provide input regarding alternatives to air traffic over HVNP.

My preference is Alternative #4, but a close second is #3. As a resident of Volcano Village since 2017, I was very surprised by the numerous and loud helicopters running visitors over the park. I had no idea that helicopters would be allowed to fly so low, loudly, and often over a residential/populated area. I just assumed that they would fly over water until reaching the park. The latter comment is my continued preference of route for air traffic - OVER THE WATER/COAST!

During the 2018 eruption and park's closure, it was a welcome respite to not have the air traffic over my home and business. With the new eruption, the reemergence of air traffic has not ben as bad as it was before (mostly because the best viewing is at night), but it has brought a disruption to the peaceful sounds I usually hear.

Please consider having all air traffic use coastal routes only.

Mar,23 2022 20:07:38

Correspondence Type:

Web Form

Correspondence: I chose Paradise Helicopters for my trip around the island of Hawaii, including flying near the volcano, Mount Kilauea. I felt safe with all aspects of the tour.

I would recommend Paradise Helicopters fully to any future users of their services.

Correspondence ID:	579	Project: 103522 Document:	118739	
Name:	Hughes, Malcolm N			
Received:	Mar,2	3 2022 20:09:03		
Correspondence Type:	Web F	Form		

Correspondence: I chose Paradise Helicopters for my trip around the island of Hawaii, including flying near the volcano, Mount Kilauea. I felt safe with all aspects of the tour.

I would recommend Paradise Helicopters fully to any future users of their services.

Correspondence ID:	580	Project: 103522 Document:	118739	
Name:	Demuth, Phil			
Received:	Mar,23 2022 20:11:06			
Correspondence Type:	Web F	form		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. My wife and I visit the Big Island frequently with a primary focus on visiting Volcano national park. We are avid hikers and photographers. One of the most anticiapted things we do is the helecopter trip over the volcano. We do this regardless of how active the volcano is because we enjoy the beaty of the park and the pilots commentary of the area. It is even more eventful when the volcano is active. I am have become very concerned as to how you are limiting the traffic cordiors... is this making the trip and the experience more or less safe. If you are planning to limit the coridor, or force the flights to be at a higher altitude, I am trying to understand how this makes the flighs more safe. The weather in that area changes frequently and fast and limiting options is not the answer. I have been more than one fligh that started as aswesome weather that tuned by the time the trip was done. At no time did i feel uneasy, but limitin options for the flights changes that dynamic. Limiting routes also has an impact not only on the the tour comanies but the families that employee them and the local business that we will not frequent while we are in Hilo. When we do these trips, we spend the remainder of the day in Hilo supporting the local business. Before I close this comment, Bonnie and I discussed this issue and thought about how on several of our tours, we had people on the tour who had disablities where this might have been their ownl opportunity to see the beatuy of the park. I want to close this comment by thanking you to allow me to provide you my thoughts as a frequent visitor to the big Island. I urge you to condier how your decision impact not only the air tour operators, the safty of the consumers, the additional revenue brought to the Hilo area and how you may be limitin access to this wonderful park to those with disabilities.

Correspondence ID:	581	Project: 103522 Document:	118739
Name:	Littrell	, Steven P	
Received:	Mar,23	2022 20:30:16	
Correspondence Type:	Web Fo	orm	

Correspondence: I have had the opportunity to tour with Paradise Helicopters of Hawaii and feel confident in saying that they had the utmost professionalism and safety flying with my family. We absolutely enjoyed the tour they provided and experienced the natural wonders of the Hawaii Volcanoes National Park in a way that we simply couldn't without their tour services. While I don't know the particular ins and outs of flying a helicopter in that environment, I trust that they do! If they are requesting certain considerations, I have to encourage you to

indulge them in these requests. I feel that the proposed restrictions would create undue issues and hardship for not only the tour operators but visitors, such as myself! These helicopter tours do not damage the environment below and allow for visitors to safely access portions of the park that would be inaccessible with other means.

I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	582         Project: 103522         Document:         118739			
Name:	Murphy, Keith M			
Received:	Mar,23 2022 20:35:20			
Correspondence Type:	Web Form			

Correspondence: Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Correspondence ID:	583	Project: 103522 Document:	118739	
Name:	Ruf, Mark			
Received:	Mar,23 2022 20:52:40			
Correspondence Type:	Web Form			

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Correspondence ID:	584         Project: 103522 Document:         118739	
Name:	Young, Cole	
Received:	Mar,23 2022 21:02:42	
Correspondence Type:	Web Form	

Correspondence: Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly people as well. This is crazy

Correspondence ID:	585	Project: 103522 Document:	118739	
Name:	Rutherford, Robert			
Received:	Mar,2	3 2022 21:15:28		
Correspondence Type:	Web F	form		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	586	Project: 103522 Document:	118739	
Name:	Blakemore, Dale J			
Received:	Mar,23 2022 21:34:44			
Correspondence Type:	Web Form			

Correspondence: Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude

Correspondence ID:	587	Project: 103522 Document:	118739	
Name:	Lopes, John M			
Received:	Mar,23 2022 21:39:46			
Correspondence Type:	Web F	form		

Correspondence: Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Correspondence ID:	588	Project: 103522 Document:	118739
Name:	Kocot,	Terri A	
Received:	Mar,23	2022 21:49:07	

Correspondence Type:

Web Form

Correspondence: To Whom This May Concern:

I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Thank you so much,

Terri Kocot

Correspondence ID:	589	Project: 103522 Document:	118739	
Name:	Burgess, David			
Received:	Mar,23 2022 21:56:46			
Correspondence Type:	Web Form			

Correspondence: Please give the air tours operators as much leeway as possible when considering restrictions on operations. My family and I went on a helicopter ride that included Volcanoes National Park in 2017 and we all thoroughly enjoyed it. It was a wonderful experience, especially flying over the lava cauldron.

It has been almost impossible for the tour operators to survive over the past two years because of the endless, ever-changing, and severe COVID restrictions. If more restrictions are imposed now, just as they are coming out of the pandemic, many tour companies may have to close.

Seeing Hawaii by helicopter is an incredible experience, that thousands of people of all ages and abilities have enjoyed. I believe that the environmental footprint is very low, much lower than ground-based tours.

I think the NPS does a great job managing the National Parks. It always seems to find a good balance for all sides. I hope that will be the case here.

Thank you.

David Burgess

Correspondence ID:	590	Project: 103522 Document:	118739
Name:	Murte	er, Jay B	
Received:	Mar,2	23 2022 22:00:38	
Correspondence Type:	Web ]	Form	

Correspondence: On our visit to Hawaii, the helicopter tour was the absolute highlight of our trip. I cannot imagine traveling to the islands and not seeing them from a helicopter. We recently heard that more restrictions were being placed on pilots in the islands, which gives us some reservations about our return trip to Hawaii. We certainly don't want to arrive and then discover that our views of volcanic activity will be more limited.

Correspondence ID:	591 Project: 103522 Document: 118739
Name:	Miller, Tim
Received:	Mar,23 2022 22:37:01
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	592	Project: 103522 Document:	118739
Name:	Harde	n, Cory	
Received:	Mar,2	3 2022 22:45:22	
Correspondence Type:	Web F	orm	
Correspondence: Sierra Club, Hawai'i Island Group PO Box 1137, Hilo, Hawai'i 96721			

Comments on Hawai'i Volcanoes National Park Air Tour Management Plan (ATMP) file:///C:/Users/333co/Downloads/HAVO-NewsletterTemplate-2-11-2022-508Compliant - DIGITAL VERSION PEPC \_ Emails (1).pdf

Aloha,

We support a fifth alternative: no air tours over the park or within one and one-half miles of the park boundary. Since the Air Tour Management Act of 2000 does not give the National Park Service (NPS) authority to do this, we urge that NPS advocate to gain that authority through an executive order or a Congressional law.

The four proposed alternatives are all insufficient to protect the environment and people's wilderness experiences. However, we note that Alternative 2 offers more protection than the others, prohibiting air tours within the ATMP planning area (areas below 5,000 feet AGL and within ½-mile of the Park boundary).

### History:

The glacial pace of action on overflight noise is unconscionable. Attempts to address the problem have now been going on for 35 years, since Public Law 100-91 was passed in 1987, containing recommendations re. protecting national parks from overflight impacts.

It took 20 years, and a lawsuit by Hawai'i Coalition Malama Pono and Public Employees for Environmental Responsibility, to compel agencies to start writing ATMPs as required by the Air Tour Management Act of 2000.

And even the August 2022 deadline set for ATMPs after that lawsuit will not be met.

In addition, the Air Tour Common Procedures Manual has not been updated for almost 15 years, despite major changes in population and land use.

Meanwhile, air tours continue to impact people and wildlife in the park. There were over 16,500 commercial air tours over the park in 2017, an average of 46 per day.

Noise impacts:

Few, if any, places on Earth, remain free of human noise. Quiet and solitude are becoming extinct. https://www.bbc.com/future/article/20140117-earths-last-place-without-noise

The Sierra Club air tours policy states:

(1) Air tours are flights conducted for sightseeing.

(2) The Sierra Club supports management tools and methods to diminish or eliminate impacts from aircraft tours and landings, including bans of tours and landings wherever and whenever appropriate, on National Monuments and units of the National Park System and the National Wilderness Preservation System.

(3) Agencies should preserve and, where there are impacts, fully restore the natural quiet within protected areas and address this issue in their general management plans.

(a) The Sierra Club believes that, to be the most appropriate and effective, control over air

tour use of airspace above such protected areas should rest with the respective land management agencies (e.g., National Park Service, U. S. Forest Service, Bureau of Land Management, U. S. Fish and Wildlife Service). These are the agencies in position to understand these areas most intimately, and which are charged to provide them the fullest possible resource protection.

(b) The managing agency should work with responsible parties to reduce or eliminate air tours or landings outside a protected area if needed to restore natural quiet within the unit. Federal managers of adjoining areas should coordinate their management planning efforts.

(c) The Sierra Club supports the establishment of appropriate noise standards and comprehensive baseline soundlevel monitoring and sound-source inventories of all protected areas. This includes continual assessment of noise from all human-generated sources and incorporation of public comments about noise impacts. Principles of Natural Quiet

(1) The sounds and silences of nature are among the intrinsic elements that combine to form the natural environment. Natural sounds amidst intervals of stillness are inherent components of the "scenery and the natural and historic objects and the wildlife" within National Monuments and units of the National Park System and National Wilderness Preservation System.

(2) Natural quiet is the extended opportunity to experience only natural sounds amid periods of deepest silence. The quiet to be preserved or restored is as defined by the National Park Service as "the quiet at the lower end of the ambient sound level range that occurs regularly between wind gusts, animal sounds, etc., not just the average sound level." As the Park Service explains, "Lulls in the wind or interludes between animal sounds create intervals where the quiet of a sylvan setting is quite striking. In considering natural quiet as a resource, the ability to hear clearly the delicate and quieter intermittent sounds of nature,

the ability to experience interludes of extreme quiet for their own sake, and the opportunity to do so for extended periods of time [are] what natural quiet is all about."

(3) Many of these protected areas are vast, open places of astonishing beauty and wildness. Each protected area has a distinct and powerful aura, fully dependent upon the tenuous natural sounds and natural quiet. As such, these areas afford unique opportunities for undistracted respite, solitude, contemplative recreation, inspiration, and education. Further, these units also provide scarce refuge and undisturbed natural habitat for animals. Artificial, human-generated noise can disturb some sensitive animal activities. Therefore, noisy overflights that disturb the peace are not normally appropriate in our protected areas.

Quotations are from National Park Service, U.S. Department of Interior, Report to Congress on Effects of Aircraft Overflights, 1994.

Policy adopted by the National Sierra Club Board of Directors, February 17th, 2001. https://www.sierraclub.org/policy/air-tours

Large portions of the park are wilderness areas. The 1964 Wilderness Act says that wilderness areas "shall be administered...in such manner as will leave them unimpaired for future use and enjoyment as wilderness, and so as to provide for the protection of these areas, the preservation of their wilderness character..."

In Hawai'i, the sound and sight of aircraft is often reported to impact native Hawaiian cultural practices.

Quiet in the park would give island residents welcome relief from the noise and vibration of tour helicopters that has been bedeviling people in their homes for decades. Repeated and widespread concerns voiced by beleaguered communities have largely been ignored. The noise terrifies children and animals, sets off PTSD in war veterans, intrudes on sleep, interrupts conversations, and causes inescapable stress. On Hawai'i Island, during the eruption, tour helicopters never let up--they kept flying, over people who were losing their homes, their neighborhoods, and their livelihoods.

Visual Impacts:

Even if quiet technology is used, the sight of aircraft impacts wildlife and impacts people's wilderness experience.

Lead agency; monitoring, and enforcement:

NPS, not FAA, should be the lead agency and enforcing agency, since the mission of NPS is to preserve resources, but the mission of FAA is to provide an aerospace system.

NPS should do full disclosure of monitoring and key findings. Noise monitoring should be appropriate for air tours, reflecting the impacts of intermittent noise and its intrusiveness upon the natural background of quiet. Use of quiet technology should be maximized to keep noise from flights near the park from entering the park area.

Aircraft should be required to use tracking devices and keep them turned on. Complaints should be tracked.

### Carbon footprint:

The tours, which are not essential travel, generate a carbon footprint. This should be quantified by NPS.

Ultrafine particles:

Ultrafine particles from aircraft emissions affect human health, and are likely to affect the health of insects and other animals under the path of air tours.

From Quiet Skies Hawai'i https://www.quietskieshawaii.org/environmental-impacts: Aircraft emissions have environmental and health impacts. Ultra Fine Particles (UFPs) have been associated with cardiovascular and neurological effects to humans, as they have been shown to cross the blood-brain barrier. Dr. Neelakshi Hudda, Research Professor, Department of Civil & amp; Environmental Engineering at Tufts University, has been studying the impacts of aviation emissions and has published peer-reviwed research.

Preterm Birth Rates Among Mothers Exposed to Ultrafine Particles from Jet Exhaust https://static1.squarespace.com/static/6177480970b3541175fcfd91/t/6195765977aeb37bb55e5459/163718511761 3/Dr+Hudda+ANE+Symposium+.pdf

Preterm Birth Among Infants exposed to In Utero Ultrafine Particles from Aircraft Emissions https://ehp.niehs.nih.gov/doi/full/10.1289/EHP5732

Emissions from an International Airport Increase Particle Number Concentrations 4-Fold at 10km Downwind https://pubs.acs.org/doi/pdf/10.1021/es5001566

International Airport Impacts to Air Quality: Size & amp; Related Properties of Large Increases in Ultrafine Particle Number Concentrations https://pubs.acs.org/doi/pdf/10.1021/acs.est.5b05313

Impacts of Aviation Emissions on Near-Airport Residential Air Quality https://pubs.acs.org/doi/abs/10.1021/acs.est.0c01859

Criteria for comments:

NPS should consider comments supporting various alternatives even if specific reasons are not given. Large numbers of these kinds of comments are valuable for reflecting community sentiment.

We appreciate the opportunity to comment on the ATMP.

Sincerely, Sierra Club of Hawai'i, Hawai'I Island Group Authorized contact: Cory Harden, 333cory@gmail.com

Correspondence ID:	593	Project: 103522 Document:	118739
Name:	Hughe	es, Shannon	
Received:	Mar,2	3 2022 23:49:20	
Correspondence Type:	Web F	form	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude

Correspondence ID:	594         Project: 103522         Document:         118739
Name:	ZD, Anel
Received:	Mar,24 2022
Correspondence Type:	Web Form

Correspondence: Hello,

In the past I have enjoyed an air tour and I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect their communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Thank you.

Correspondence ID: Name: Received: 595 Project: 103522 Document: 118739 Schardt, Marco Mar,24 2022

### Correspondence Type:

#### Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Correspondence ID:	596         Project: 103522         Document:         118739
Name:	Taylor-Bishop, Andrew
Received:	Mar,24 2022
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	597         Project: 103522 Document:         118739
Name:	Stojak, Henry E
Received:	Mar,24 2022 01:01:44
Correspondence Type:	Web Form

Correspondence: How else would i have seen, experienced or embraced the majesty of the Nationality park and lava fields. My time on the island was extremely limited and doing this from the air was the only way available to me.

I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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	500 D 1 4 402500 D 440500
Correspondence ID:	598 Project: 103522 Document: 118739
Name:	Palstologlo, Tom
Received:	Mar,24 2022 02:35:31
Correspondence Type:	Web Form
Commence down on Devile store down of survey for	flains descendence have been been deside a desultation Des

Correspondence: Don't stop dem choppers from flying over day volcano brah. Dey needs jobs, don't take Der jobs

Much obliged good sirs and madams.

Correspondence ID:	599	Project: 103522 Document:	118739
Name:	Sumne	er, Jeremy	
Received:	Mar,2	4 2022 02:58:27	
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Correspondence ID:	600 Project: 103522 Document: 118739
Name:	Williams, Shelley L
Received:	Mar,24 2022 03:09:10
Correspondence Type:	Web Form

Correspondence: One of the reasons for our visit to the Big Island was to experience the vastness of this beautiful National Park and the magnificent volcano.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

I urge you to carefully consider the economical impacts as well as other considerations in your decision making. Your decisions have the capacity to significantly effect tourism on the Big Island.

Correspondence ID:	601         Project: 103522         Document:         118739
Name:	Williams, Shelley L
Received:	Mar,24 2022 03:09:11
Correspondence Type:	Web Form

Correspondence: One of the reasons for our visit to the Big Island was to experience the vastness of this beautiful National Park and the magnificent volcano.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. I urge you to carefully consider the economical impacts as well as other considerations in your decision making. Your decisions have the capacity to significantly effect tourism on the Big Island.

Correspondence ID:	602 Project: 103522 Document: 118739
Name:	Fryer, Steve
Received:	Mar,24 2022 04:35:09
Correspondence Type:	Web Form

Correspondence: As someone who has greatly enjoyed a helicopter tour on Hawaii's big Island, which made for outstanding positive memories for us, we are concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	603	Project: 103522 Document:	118739
Name:	Ritlan	d, John	
Received:	Mar,24	4 2022 05:18:35	
Correspondence Type:	Web F	orm	

Correspondence: My wife and I have enjoyed the air tours via helicopter in Hawaii. Being a pilot myself I enjoy the different perspective air tours provide. Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Correspondence ID:	604 Project: 103522 Document: 118739		
Name:	, Mark		
Received:	Mar,24 2022 05:33:29		
Correspondence Type:	Web Form		

Correspondence: Throughout my many trips to the Islands of Hawaii, I sincerely comment that the helicopter tours were the most rewarding and valued experiences of my vacations. I would highly encourage allowing the flights to continue as they are currently conducted. I felt safe, entertained, and perceived no impact upon persons or animals.

Please leave the responsible flying and choices to the operators and pilots, not bureaucracy, policy, and regulation.

Thank You.

Correspondence ID:	605 Project: 103522 Document: 118739
Name:	McGrath, Mike
Received:	Mar,24 2022 05:36:18
Correspondence Type:	Web Form

Correspondence: Aloha

I am an Australian aged 73. My wife and I have travelled extensively over the years. We spent time on the Big Island in July 2019, with a significant part of our interest being the volcanic activity in the years just before. We did a land based tour, which was informative, but the helicopter tour with Paradise Helicopters gave us the strategic overview which is essential to understanding both past activity, and possible future impacts. We have Australian friends who did a similar trip with Blue Hawaiian a few months earlier, and they have the same views.

I am a town planner by profession, with many years in working directly with the public on land use, infrastructure and environmental issues. I do not pretend to know the many different local factors you need to address in the ATMP, but I can guess at some.

All I ask is that you deeply consider the beneficial role played by the chopper operators. Both our friends', and our personal experiences were that the operators were careful, environmentally conscious, highly skilled, very educational, and superb ambassadors for both the HVNP and Hawaii. We returned to Australia with a much better understanding of the environmental and economic roles played by the volcanoes, and the impacts on the Island's community. We follow closely news of fresh activity, and changes in the caldera, magma chamber, etc.

We have encouraged others to visit the Islands, and if not for Covid, we would probably have been back by now! How you choose to weigh up this economic and social support in your task is, of course, up to you. I just ask that you minimise restrictions on this critical sector of tourism infrastructure and service. It's skilled operators do so well at providing a unique and essential window on HVNP, and Hawaii will be the loser if over regulation occurs. Mahalo

Mike McGrath 24 March 2022

Correspondence ID:	606	Project: 103522 Document:	118739
Name:	Davis,	Brian S	
Received:	Mar,24	4 2022 05:53:27	
Correspondence Type:	Web F	orm	

Correspondence: Having visited Hawai'i a few years ago and taken a tour of the island by helicopter, I find is extremely sad that there are currently regulations being considered that would prevent others from experiencing the beauty and thrill that my daughter and I were provided. The helicopter tour of the island rivaled every other experience we had on the island and removing this option or curtailing it would greatly diminish the appeal of visiting the island. I will definitely recommend anyone looking into visiting the island make sure that the helicopter tour of the volcano park and waterfalls is available prior to committing to such an expensive and arduous adventure.

Correspondence ID:	607	Project: 103522 Document:	118739
Name:	Bhakta	, Bina	
Received:	Mar,24	2022 06:01:49	
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	608 Project: 103522 Document: 118739
Name:	Masecar, Barbara
Received:	Mar,24 2022 06:18:53
Correspondence Type:	Web Form

Correspondence: Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Correspondence ID:	609         Project: 103522         Document:         118739
Name:	Kendrick, Jesse J
Received:	Mar,24 2022 07:17:42
Correspondence Type:	Web Form

Correspondence: My wife and I have enjoyed helicopter tours over three of the islands. As a 20 year veteran of Naval Aviation with over 4500 flight hours, I know the importance of flexibility in filing flight plans, as well as the ability to deviate once in the air to account for various factors such weather and other unforeseen circumstances.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Please do not put any further restrictions on tour providers, their current safety record should speak volumes about the way they operate. Further restrictions may force some operations to close thus resulting in the loss of jobs and tax revenue for the state.

Correspondence Type:

Mar,24 2022 07:23:44

Web Form

Correspondence: My husband and I were able to fly on our honeymoon over the park and view the Volcano. It was done with safety in mind and caution. It was a once in a lifetime moment. It allowed me to view with my handicap. The drive and walking in the national park I would not have been able to do. Please keep this in mind as you propose sanctions to the heli tours. It allows people access to amazing moments .

Correspondence ID:	611 Project: 103522 Document: 118739
Name:	Stevenson, Janice P
Received:	Mar,24 2022 07:25:16
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	612 Project: 103522 Document: 118739
Name:	Taylor, Guy
Received:	Mar,24 2022 07:42:58
Correspondence Type:	Web Form

Correspondence: The ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park severely affect the ability of the elderly to view, experience and enjoy one of this country's most spectacular PUBLIC landmarks. We are no longer able to avail ourselves of more conventional ways to view this amazing natural phenomenon. By needlessly further restricting the routes and altitudes available you will be affectively putting much of this parks' beauty off limits to the citizens you serve.

Guy & amp; Kathy Taylor

Correspondence ID:	613	Project: 103522 Document:	118739
Name:	Mapes,	Kim	
Received:	Mar,24	2022 07:43:21	
Correspondence Type:	Web Fo	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly

regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	614	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,24	4 2022 07:52:35	
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

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Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	615	Project: 103522 Document:	118739
Name:	Bell, N	lancy K	
Received:	Mar,24	4 2022 08:00:19	
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	616 Project: 103522 Document: 118739		
Name:	Conroy, Michell L		
Received:	Mar,24 2022 08:30:01		
Correspondence Type:	Web Form		

Correspondence: Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. I lived on Oahu for the better part of a decade and going on a helicopter tour was the one and only tourist thing I ever did while there. When I went to Big Island, I also enjoyed a helicopter tour over the volcano. The pilots were great and I felt completely safe even when they had to change altitudes and direction because of wind and fog/clouds. Forcing a completely designated path could impact the safety of these tours or shut them down completely. The pilots need the flexibility to provide a safe tour to guests and kama aina alike.

Correspondence ID:	617	Project: 103522 Document:	118739
Name:	Francavage, Robert A		
Received:	Mar,24 2022 08:31:40		
Correspondence Type:	Web F	orm	

Correspondence: Please Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	618	Project: 103522 Document:	118739
Name:	Kruger, Leonard		
Received:	Mar,24	4 2022 08:43:44	
Correspondence Type:	Web F	orm	
Correspondence: Hello,			

It is my sincere hope that my comments are taken seriously and others think them through. When I did the Helo tour a few years ago, it was my 2nd trip to Hawaii. On my first trip in 1983, I missed the Kilauea eruption by something like 2 weeks. I was bummed but being an outdoorist, amateur geologist and general nature appreciator, I can say that booking my 2nd trip to experience (key word) the volcano was a long time coming.

It seems to me that the proposed restrictions are from locals, local government and those in the NPS that see the volcano experience as something 'routine'. Setting limitations on routine is the way I read them but they fail to acknowledge that this experience is so TOTALLY 'new', exciting and educational to most, if not all non-Hawaiian visitors. My flight brought us down to 500(?) feet over the lava fields. We smelled the logs burning. What an AWESOME experience! The sheer power of Pele!!!

From a scientific and educational perspective, vulcanology doesnt get any more real that this. The thrill of flying in a doorless helicopter over such awesome landscape is a lifelong memory. Further, flying over the falls and the other scenic areas just reinforces how beautiful Hawaii really is. I fail to understand how limiting the flight path and distance from the ground will somehow 'preserve' the landscape. I understand the religious aspect but would counter, how else will others understand the power of Pele and respect it without seeing it up close?

As the saying for conservative hiking states: "take nothing but pictures and leave nothing but footprints", which in the volcano helo touring world is the sound of the copters in the wind, which only lasts a few minutes. Nothing was harmed.

My opinion is that no restrictions are needed or should be considered until (God help us), some unfortunate accident occurs. Until then, I still have all my pictures and memories. Thank you for reading.

Correspondence ID:	619	Project: 103522 Document:	118739
Name:	Zerega	n, Patricia	
Received:	Mar,24 2022 08:52:08		
Correspondence Type:	Web F	orm	

Correspondence: My husband and I used Paradise Helicopter Tours in October 2021. We very much enjoyed our views of Volcano NP. It provided views we never could have seen or even accessed from the ground. I sustained an ankle injury while in Hawaii, and never would have been able to hike to see the volcanoes. We felt the operator was very safety conscious and considerate of other helicopters in the area. I have been visiting National Parks for more than 50 years and respect the need to keep the parks pristine, however parks should also be accessible to all people. I believe this branch of tourism provides many jobs and money to the economy too. I would hate to see the tours stopped.

Correspondence ID:	620	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,24	4 2022 08:59:50	
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher

altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	621	Project: 103522 Document:	118739
Name:	Green	, Jeremy M	
Received:	Mar,24	4 2022 09:18:33	
Correspondence Type:	Web F	form	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	622	Project: 103522 Document:	118739
Name:	Flick,	Craig L	
Received:	Mar,2	4 2022 09:32:43	
Correspondence Type:	Web F	orm	

Correspondence: First of all let me thank you for allowing me to communicate about this issue.

The highlight of our entire trip was the door less helicopter ride over the volcano. This was amazing to get the view that only comes from a helicopter. The added aspect of the doors off was great to allow you to feel the heat and smell the smells. I was impressed with the professional ground and flight crews. Safety was very important to everyone involved; this included them ensuring we were buckled in properly & amp; giving us safety instructions. The pilot was very accomplished with many years of experience. He was also in communication with us during the whole flight to make sure we were all doing ok and that we didn't have any issues or concerns during the flight.

Please, I request you to NOT make any changes that would limit their current access or that may cause them to not be able to continue their service. If we lose the ability to do this in the future it would be a major impact on

dollars and on tourism. By us taking this helicopter ride, it encouraged us to want to see more of Volcano National Park from the ground, and we were planning on taking our kids next time on this ride.

Correspondence ID:	623	Project: 103522 Document:	118739
Name:	Sweet,	Anna	
Received:	Mar,2	4 2022 09:46:54	
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	24 Project: 103522 Document: 118739	
Name:	axton, Duane M	
Received:	Mar,24 2022 10:01:14	
Correspondence Type:	Veb Form	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	625	Project: 103522 Document:	118739
Name:	McCla	in, Sonja D	
Received:	Mar,24	4 2022 10:10:11	
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. I was a flight nurse for years so I know about flight patterns and also know how pilots need to be able to fly around certain weather patterns and need to be able to do that to keep everyone safe.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Sonja McClain PHRN, RN

Correspondence ID:	626 Project: 103522 Document: 118739		
Name:	H, Jen		
Received:	Mar,24 2022 10:11:52		
Correspondence Type:	Web Form		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Correspondence ID:	627	Project: 103522 Document:	118739
Name:	Lewis	, Colleen	
Received:	Mar,2	4 2022 10:12:13	

Correspondence Type:

#### Web Form

Correspondence: Thank you for this opportunity to comment. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Please don't take this powerful experience/attraction away those hoping to see the beautiful state of Hawaii.

Correspondence ID:	628 Project: 103522 Document: 118739
Name:	Khandekar, M
Received:	Mar,24 2022 10:19:17
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	629 Project: 103522 Document: 118739
Name:	Gassert, Tilman E
Received:	Mar,24 2022 10:22:47
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	630 Project: 103522 Document: 118739
Name:	B, Sid
Received:	Mar,24 2022 10:43:28
Correspondence Type:	Web Form

Correspondence: Dear NPS Representatives,

I have had the Wonderfull opportunity to be both a visitor to the Volcanoes NP and the Volcano House and I have never felt that my visit was hindered or disturbed at any point by the operation of the air tour services operating at any altitude. I have had the incredible opportunity to to take air tours of the volcano sites, surrounding areas and entire island. These, I must say have been some of the greatest events in my life to date. To be able to see the beauty of the park and the Island from above truly gives me a sense of awe and amazement. It takes great planning and lots of savings for me to be able to visit Hawaii, I wish I could come more often and I must state that I would certainly reconsider my options if restrictions were to be made on the air tour program. To not have the option to take a tour in the limited time I am there because of flight restrictions that limit the opportunity for those of us who have to save and plan for these special events would truly not make the trip as enjoyable or worthwhile. Weather is always a concern and can cause possible delays or rescheduling, this on top of restrictions would adversely affect the tour industry and in turn affect the overall tourist experience for any visitor to the wonderful and amazing island of Hawaii. Please let the air tour industry continue and don't hinder the experience of those who wish to see the amazing beauty of Hawaii from the air.

Correspondence ID:	631	Project: 103522 Document:	118739	
Name:	Stevenson, Jim			
Received:	Mar,24 2022 10:47:42			
Correspondence Type:	Web I	Form		
Correspondence: Aloha,				

I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP).

On all past visits to these terrific islands I/we have used helicopter services to see many different parts of the islands that are either not accessible or very difficult to access.

My photography business/hobby is directly affected by the height and flight path proposed regulations. Difficult enough to take photographs as it is, but extreme height means longer lens and much more difficulty.

The reasons given for these new rules do not make a lot of sense, getting to these locations will be more difficult and destructive on land than by air.

Please take a close look at the destructive effects to the industry, and all the related industries, by putting regulations in place that really do not accomplish anything but " feel good, virtue signalling" optics.

I will not be using these services should these restrictions be put into place.

Mahalo,

Jim Stevenson, Grump's Photography, Ottawa, Canada

Correspondence ID:	632	Project: 103522 Document:	118739	
Name:	grace, richard			
Received:	Mar,24 2022 10:58:57			
Correspondence Type:	Web F	orm		

Correspondence: I was very pleased EACH time I hired Paradise. They were efficient and well informed. I am a former USMC infantry officer and have had a lot of experience with helicopters. I was very impressed with the emphasis on safety displayed by each pilot. I will use Paradise the next time I decide to fly around the Island. I have recommended them to several other folks in the past. They, like me, were very satisfied. Richard Grace

Correspondence ID:	633	Project: 103522 Document:	118739
Name:	Gordon, Lori T		
Received:	Mar,24	4 2022 11:03:41	
Correspondence Type:	Web F	form	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	634	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,2	4 2022 11:08:44	
Correspondence Type:	Web F	Form	
			·

Correspondence: I visited the Big Island and took a helo trip a few years ago. It was beyond awesome. That being said, maintaining and protecting Kilauea and the surrounding environs is far more important than profit taking by the tourist industry. Please do whatever is necessary to keep the volcano safe and sound. Thanks for your work. Aloha

Correspondence ID:	635 Project: 103522 Document: 118739
Name:	Chess, Jay
Received:	Mar,24 2022 11:09:36
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	636	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,24 2022 11:29:30		
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	637 Project: 103522 Document: 118739
Name:	Evilsizer, Dale
Received:	Mar,24 2022 11:31:26
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated

Correspondence ID:	638	Project: 103522 Document:	118739	
Name:	,			
Received:	Mar,24 2022 11:31:39			
Correspondence Type:	Web F	orm		

Correspondence: I am in favor of these new guidelines.

Correspondence ID:	639	Project: 103522 Document:	118739	
Name:	B, Richard			
Received:	Mar,24 2022 11:42:26			
Correspondence Type:	Web F	orm		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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I have been on these tours and am confident that the company and pilots are professional in every way and felt safe and did not think the experience affected the environment in any unusual way..

Correspondence ID:	640	Project: 103522 Document:	118739
Name:	Miller	Bonnie	
Received:	Mar,24	4 2022 11:43:11	

## Correspondence Type:

### Web Form

Correspondence: PLEASE support Congressman Case on this ban. It is like living in a war zone to have these helicopters flying over and around my house. It is a huge degradation of our quality of life here. Apparently other congresspeople are supporting the helicopters as a way to generate income for the state? If this is why there isn't more support for this ban in Congress, then it should be known that this sacrifice is on the backs of those of us who live here in this flight path. Surely some creative thinking and legislating by Congress would come up with less environmentally destructive and economically rewarding ways to help the Hawaiian economy. Sincerely,

Bonnie Miller

Congressman Case Urges Public Comment Supporting Ban On Commercial Tour Helicopter/Small Aircraft Overflights Of Hawaii's Two National Parks

Ban Is One Alternative Under Consideration By National Park Service And Federal Aviation Administration In Development Of Air Tour Management Plans For Precious But Disrupted Hawai'i Volcanoes And Haleakala National Parks

Honolulu, HI, March 22, 2022

(Honolulu, HI) - Congressman Ed Case (HI-01), a member of the U.S. House Committee on Natural Resources and Subcommittee on National Parks, Forests, and Public Lands which has jurisdiction over the country's 63 National Parks, today urged the public to submit comments to call for the protection of Hawai'i Volcanoes National Park and Haleakalā National Park.

"Throughout our Hawai'i, excessive unregulated commercial helicopter/small aircraft tour operations have heightened safety concerns in the air and on the ground and severely disrupted our communities and special places," said Case. "This has been especially true in our two treasured national parks, Hawai'i Volcanoes and Haleakalā, with pre-COVID overflights of 16,500 per year for Hawai'i Volcanoes and 5,000 per year for Haleakalā, some of the very highest in the entire National Park System.

"These flights disrupt communities on the way to and from the parks, destroy the serenity of these natural treasures, have significant impacts on the natural environment and soundscape, inhibit perpetuation of cultural connections to our landscapes, impede the preservation of endemic Hawaiian ecosystems and diminish visitors' abilities to learn about and enjoy the parks' resources."

Case continued: "In 2000, Congress passed the National Parks Air Tour Management Act to require the National Park Service (NPS) and Federal Aviation Administration (FAA) to work together to set up specific air tour management plans (ATMP) for each national park, but the agencies, especially the FAA, dragged their feet for over a decade. It took a lawsuit from a Hawai'i community group for the federal courts to order FAA and NPS to implement either ATMPs or voluntary agreements for the most heavily-impacted parks including Hawaii's.

"The NPS is now proceeding with development of ATMPs for Hawai'i Volcanoes and Haleakalā and is requesting public comment on alternatives: (1) no action/status quo/historic levels; (2) maximum protection/no air tours under 5,000 feet above ground within a half mile of the parks; (3) specific routes through the parks with caps on total flight per day and annually; and (4) (for Hawai'i Volcanoes) more limited routes with caps. The Honolulu Civil Beat article here summarizes the process."

"I will be submitting comments urging maximum protection for both of our parks," said Case.

"I will be saying basically that no company or person has the right to destroy our national parks for any reason, including tourism, that we have many other opportunities for different people of different abilities to enjoy our national parks, and that air tours are fundamentally inconsistent with the reasons for which we established our national parks to start with."

"We need your help with your own comments in your own words and from your own experiences," said Case. The deadline for submission is April 1st. The NPS is asking for "substantive comments," meaning more than just that you support an alternative, but why and why the other alternatives won't work. To review the ATMP proposals and comment: here for Hawai'i Volcanoes National Park and here for Haleakalā National Park.

Received:

Correspondence Type:

#### Web Form

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plans for Hawaii Volcanoes National Park.

I have serious concerns with the development process of the Air Tour Management Plans (ATMP) by the National Park Service (NPS) and the Federal Aviation Administration (FAA). NPS and the FAA have ignored 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. Excluding the NPOAG from providing input on the ATMP process is in direction contradiction of FAA Order No. 1110.138A.

NPS does not have the necessary expertise to fundamentally redesign the airspace over these parks. The ATMPs proposed by NPS would relocate, constrict, and combine flight routes and would make substantial changes to flight altitudes. The current flight routes and altitudes have been in place for years and are well understood by industry. The changes proposed by ATMP have severe aviation safety implications that should have been deliberated in the NPOAG, as Congress intended in the National Parks Air Tour Management Act of 2000.

The proposals currently under consideration will force aircraft into potentially unsafe flight conditions. The NPS has proposed increasing the minimum flight altitude over Hawaii Volcanoes National Park from an allowed minimum 500 feet AGL to 1,500 feet AGL, which does not provide adequate safe options for navigation in typical weather patterns that exist in the park. Even more concerning is that the proposals have fixed narrow flight routes that do not take into account the areas constantly changing weather patterns.

I also have serious concerns with the economic impact these plans will have on helicopter air tour companies. The draft plans' flight allocation numbers do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change and NPS needs to respect that dynamic, as visitors alter their destinations according to those trends.

The NPS has failed to reach out to the operators to enquire what economic impacts might arise implementing a management plan that restricts overflights. Operators are already suffering economically post COVID-19, loosing over 80% of their businesses due to the shutdown of international travel. Further restrictions will cripple an already fragile industry trying to rebuild.

In 2020, Hawaii Volcanoes National Park welcomed 590,000 visitors, a 57% decrease from 2019 when the park welcomed over 1,300,000 visitors. This year many National Parks saw their resources strained by the large number of visitors as the public began to travel again. Air tours are an important option for many visitors conducting a one-in-a-lifetime trip to see famous natural landmarks. Visitors taking advantage of air tours benefit by avoiding traffic, wait times, and walking trails that are inaccessible for the handicapped or elderly, while reducing congestion and demand on park infrastructure.

Like ground-based tours, air tours are a valid part of our visitor experience, providing a unique window from which we can share our cultural, historical and environmental sites with the world. Air tours require no ground-based infrastructure at the park, which allows visitors accessibility without the need for roads, trails, signs, bathrooms, garbage cans, or other services.

By further restricting an already limited number of allowable air tours, we are reducing opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance. Through carbon-offset efforts and strict altitude requirements to control noise just to name a few efforts air-tour operators are working to ensure they are responsi

Correspondence ID:	642	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,24	2022 12:21:52	
Correspondence Type:	Web Fo	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	643	Project: 103522 Document:	118739	
Name:	Dailey, Dalton			
Received:	Mar,24 2022 12:27:27			
Correspondence Type:	Web F	orm		

Correspondence: I have visited Hawaii many times and have thoroughly enjoyed seeing our National Volcano Park from the air. I feel any restrictions proposed the potential for limited access for those who cannot hike would be inappropriate. These flights have such low impact and yet provide the best viewing for our citizens to enjoy this national treasure. I respectfully request that these new measures aren't imposed. Thank you

Correspondence ID:	644	Project: 103522 Document:	118739
Name:	Dailey, Dalton		
Received:	Mar,24 2022 12:27:28		
Correspondence Type:	Web Form		

Correspondence: I have visited Hawaii many times and have thoroughly enjoyed seeing our National Volcano Park from the air. I feel any restrictions proposed the potential for limited access for those who cannot hike would be inappropriate. These flights have such low impact and yet provide the best viewing for our citizens to enjoy this national treasure. I respectfully request that these new measures aren't imposed. Thank you

Correspondence ID:	645 Project: 103522 Document: 118739		
Name:	Garcia, H		
Received:	Mar,24 2022 12:31:20		
Correspondence Type:	Web Form		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	646	Project: 103522 Document:	118739
Name:	Crisp, David T		
Received:	Mar,24 2022 12:31:36		
Correspondence Type:	Web Form		

Correspondence: I would like to comment about the proposed restrictions as a tourist visiting The Big Island we really enjoyed the opportunity to fly over the park at a lower altitude to view it in detail and also I strongly agree with this statement Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Correspondence ID:	647	Project: 103522 Document:	118739
Name:	Legg, Linda S		
Received:	Mar,24 2022 12:54:13		
Correspondence Type:	Web Form		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Correspondence ID:	648	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,2	4 2022 12:56:23	
Correspondence Type:	Web F	form	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Correspondence ID:	649	Project: 103522 Document:	118739
Name:	goldie,	, raymond j	
Received:	Mar,24	4 2022 13:21:12	
Correspondence Type:	Web F	orm	

Correspondence: I have a PhD in volcanology. I visited and flew over Kilauea many times from 1983 to 2017 because observation of eruptions, and their products, are vital to understanding ancient volcanic rocks in Canada, the US and Australia, and the copper and nickel deposits that they host. I did not visit during 2018 because I was respectful that the volcanic activity was occurring largely in populated areas and I did not want to impose myself on people whose lives and property were at stake.

I note that helicopter flights over Hawaii Volcanoes National Park are highly regulated, and I support their continuation while maintaining concern for inhabitants who could be disturbed by noise and loss of privacy.

Correspondence ID:	650 Project: 103522 Document: 118739
Name:	Miburn, Donald P
Received:	Mar,24 2022 13:26:19
Correspondence Type:	Web Form

Correspondence: I am a general aviation pilot and a retired senior. My wife and I visited Hawaii recently and enjoyed a helicopter tour with Paradise Tours. As a pilot I check the log book hours of our pilot and the hours in the type of aircraft she was flying. I checked the number of tour flights she had successfully taken. My point is that flight restriction imposed on tours by the National Park Service are unnecessary. These restriction will take the enjoyment and pleasure out of helicopter flights over the volcanoes. We flew during active lava activity and lava flows into the ocean. We had full confidence in the pilots judgement to fly safely under the current FAA guidelines governing such areas of flight. National Parks service need to monitor the tour companies and the qualification of the pilots engaged in the tour flights and should not impose restrictions on the tour operator. I am also an aimature photographer and was able to get some great pictures of not only the volcano landscape but natural waterfalls and other areas of our great state of Hawaii. Leave the judgement of proper flying to the pilots where it belongs. The National Parks Service should not impose restrictions on altitude and and flight paths on tour operators. Pilots should have the right to alter their flights as the atmospheric conditions dictate to allow tourists an enjoyable and safe tour. Received:

Mar,24 2022 13:34:52

Correspondence Type:

Web Form

Correspondence: I do not support more restrictions on chopper flights over Volcano National Park. The one flight taken several years ago - without doors - was wonderful and more than we expected.

Correspondence ID:	652	Project: 103522 Document:	118739
Name:	Wilson	, Norman	
Received:	Mar,24	2022 13:35:51	
Correspondence Type:	Web Fo	orm	

Correspondence: Air tours are a safe way to experience the park and often a life-time experience. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe and less attractive to visitors. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Correspondence ID:	653	Project: 103522 Document:	118739
Name:	Kung, Hugh		
Received:	Mar,24 2022 14:13:17		
Correspondence Type:	Web Form		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	654	Project: 103522 Document:	118739
Name:	Lynn, D	Diann K	
Received:	Mar,24	2022 14:26:16	
Correspondence Type:	Web Fo	rm	

Correspondence: Disclaimer: I have not read all of the attached docs and am commenting based on a news report I saw on TV and an "Island Voices" article in today's (24 Mar 22) HSA. I'm a Hawai'i resident and not-often-but-avid park user (esp Volcanoes NP).

I am in general in favor of restrictions (and I should say also appropriate special allowances) that enhance park users' appreciation and understanding of park resources. I am also an "environmentalist" but in moderation. I would caution if some additional restrictions being envisioned are reactions to overly-zealous "protectors" of the 'āina and etc. - we need to ensure we are protecting it with the goal of both enjoying it as well as co-existing with it (causing no harm). (I'm probably preaching to the choir.

# My bottom line is that I think the 'Island Voices" article

(https://www.staradvertiser.com/2022/03/24/editorial/island-voices/column-more-restrictions-on-national-parkair-tours-unwise-unsafe/) makes good points that the helo services (another disclaimer - I don't even like helicopters or riding in them!) provide very important access to visitors and kama'aina alike - \*including,\* as the author points out, disabled folks who might otherwise not be able to visit - to places, views and experiences that are inaccessible any other way. Mr Dorn cites what he states are significant safety and practicality issues that might ensue with the current restrictions; I recommend the proposed rules be carefully re-evaluated with those concerns in mind.

Mahalo for the opportunity to comment! Karin Lynn Mō'ili'ili, O'ahu

Correspondence ID:	655 Project: 103522 Document: 118739
Name:	Hollamby, Darryll
Received:	Mar,24 2022 14:34:28
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots.

As a tourist, being able to see the park from the air was a major consideration in travelling to Hawaii, and we considered the air tours the most efficient way to view as much of the park highlights as safely as we could. Being geographically restricted from an air tour may mean just being able to see what is possible from the ground. Restricted ground accessibility (ie vehicular and pedestrian access) means that the park cannot be fully appreciated, hence the reason for opting for an air tour.

Many tourists may only experience the park only once in their lifetime. Make it possible for an experience that encompasses as much of the park (and its views) as possible and allow those tourists to talk about it again and again, encouraging others to witness the spectacular and unique landscape.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	656 Project: 103522 Document: 118739
Name:	Gordillo, Eric R
Received:	Mar,24 2022 14:42:08
Correspondence Type:	Web Form

Correspondence: To whom it may conern:

I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. As an elderly person, air tours give me the opportunity to enjoy the beauty of the Islands. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	657 Projec	ct: 103522 Document:	118739
Name:	Roy, Keith		
Received:	Mar,24 2022 14:45:51		
Correspondence Type:	Web Form		

Correspondence: I have included some additional comments below.

I am a part time Canadian and part time resident of the big island of Hawaii. I love taking guest on helicopter tours through the park when they come to visit me. Any policies that make that more difficult (and possibly less safe) are very concerning to me.

I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	558         Project: 103522         Document:         118739		
Name:			
Received:	Mar,24 2022 15:12:01		
Correspondence Type:	Web Form		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the

environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	659	Project: 103522 Document:	118739
Name:	CLIFT	TON, DEANNE	
Received:	Mar,2	4 2022 15:26:10	
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

Air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	660	Project: 103522 Document:	118739
Name:	Barr, Warren		
Received:	Mar,2	4 2022 15:32:06	
Correspondence Type:	Web F	form	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support. Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

As an air travel tourist, it appears you are taking all the fun out it!

Correspondence ID:	661	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,24	2022 15:49:25	
Correspondence Type:	Web Fo	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	662 Project: 103522 Document: 118739
Name:	Burton, Lowell
Received:	Mar,24 2022 16:00:28
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	663	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,2	4 2022 16:09:40	
Correspondence Type:	Web F	form	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	664	Project: 103522 Document:	118739
Name:	Dorn, Stacey		
Received:	Mar,24 2022 16:34:37		
Correspondence Type:	Web F	orm	

Correspondence: Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Correspondence ID:	665	Project: 103522 Document:	118739
Name:	Kotler,	Davod	
Received:	Mar,24	2022 17:00:22	

Correspondence Type:

#### Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	666 Project: 103522 Document: 118739
Name:	, Derek
Received:	Mar,24 2022 17:21:53
Correspondence Type:	Web Form

Correspondence: They should not be allowed to fly over or writhin 50 miles of any residential area. They are always over my neighborhood agitating the pets and birds and making noise pollution for residents. Some pilots fly low so their passengers can check out the neighborhood which is dangerous and irritating. They should only be allowed once a week to fly the park and have to enter and exit from the coastline online flying over park land. Also maintain a height as to be unnoticeable to animals in the area.

Correspondence ID:	667 Project: 103522 Document: 118739		
Name:	, Robert		
Received:	Mar,24 2022 17:24:29		
Correspondence Type:	Web Form		

Correspondence: The Air Tour industry is a vital part of Hawaii's economy and the overall visitor experience and industry. Please let's keep this alive as there is no on the ground impact to the parks, a wonderful way to view the parks and Keeps us competitive in the tourism business around the world. Don't change the minimum flight altitude and keep current flight routes as they are.let's not get into unfair, unsafe and over-restrictive policy that have the potential to ground this industry. Thank you for considering my comments

Correspondence ID:	668	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,24 2022 18:29:51		
Correspondence Type:	Web I	Form	

Correspondence: I support Alternative 2.

I would also add the I would support re-opening this discussion if and when such aviation technology exists that would permit aircraft to fly generating a comparable noise level to safe, properly maintained and unmodified land vehicles.

Correspondence ID:	669         Project: 103522 Document:         118739
Name:	Mol, Phil
Received:	Mar,24 2022 18:55:15
Correspondence Type:	Web Form

Correspondence: When my wife and I visited Hawaii we took several helicopter tours over a variety of scenic and educational destinations. Truly seeing the oil leak spots from the Arizona from the sky swelled my throat with appreciation for what those men sacrificed for our freedoms. Watching live volcano runs gave me a great appreciation for the power of nature.

Sometimes the air is the only place to gain the perspective of what's occurring, and other times the air is the only safe way for someone to see first hand the power of a volcano. If you limit the availability of the helicopter tours or unreasonably limit their paths they just may not be able to expose their tourist to what the tour's goal is. This will cause disappointment. Too much disappointment and the word will get out that these tours are not worth the expense. If that happens, the helicopter rides will close due to lack of business.

If you are regulating their traffic in the name of safety, I'm thinking that would be a little disingenuous. The number one person interested in safety is the pilot. Our Paradise Tour pilot was interested in our weight, were we sat, and even made sure we had lanyards for our phones so we didn't drop them and intuitively "chase" them as they fell. If his helicopter were to go down, he'd die right beside me; and I don't think he too keen on that idea.

Another safety angle is the number of people who visit Hawaii after decades of saving up enough to vacation in Hawaiian f. It was my wife's goal to visit for our 25th anniversary, but we didn't make it until our 30th. What does that have to do with safety? We weren't young and agile by the time we made it to Hawaii. You've got great museums, hotels and other sites to see that aren't strenuous, but if as many elderly that see the volcanos from the ski were to try to hike onto some of the available lava flow areas, the state would likely incur an increase in medical emergencies in remote areas. There are plenty of us that think, "Oh sure, I could still do that!!" Just to find out we couldn't.

Thank-you for reading my comments, and thank-you for being concerned for the safety of your tourists. But I believe the pilot is the person who has the best knowledge as to what is safe or what is stupid.

Phil

Correspondence ID:	670 Project: 103522 Document: 118739
Name:	Hugens, Steven
Received:	Mar,24 2022 19:25:11
Correspondence Type:	Web Form

Correspondence: Good Afternoon,

Thank you for allowing me to submit a thought about some proposed changes encompassed in your Air Tour Management Plan. This came to light as several years ago my Wife and I had a chance to take a one hour helicopter tour of the island of Oahu. We did not fly overt the Volcanic National Park - which. I believe is the focus of this ATMP. From our going back in our memories to the tour we experienced, my wife and I are unable to ascertain any issues that would prose problems for wildlife. The pilot very respectfully told us why were not allowed to fly closer to some posts we. We're interested in seeing close. If the pilot we had for our tour is representative of most pilots, I believe that the industry is doing a fine job of policing themselves. These are the thoughts of my wife and I. I can include "cut & amp; paste" comments as well. But the important point was that after we finished the, we were struck with the level of professionalism by those pilots. I am happy to make myself available to this process in any way we can

Correspondence ID:	671	Project: 103522 Document:	118739
Name:	Franke	, David K	
Received:	Mar,24	2022 20:30:44	

Correspondence Type:

Web Form

Correspondence: Aloha,

As a former resident of Volcano and as long-time hiker in Hawaii Volcanoes National Park, I would like to encourage you to do anything you can to reduce air tours over the park. The tours adversely affect the wilderness experience. Alternative 2 is the best solution. Short of that, please consider (1) restricting the number of flights on a particular route per hour; (2) prohibiting flights several consecutive days per week; (3) increasing the height at which they fly (4) restricting flights to only a few corridors that will have the least impact on hikers and wildlife and (5) only QT aircraft should be allowed.

Correspondence ID:	672 Project: 103522 Document: 118739		
Name:	Steinkey, Terry		
Received:	Mar,24 2022 20:49:39		
Correspondence Type:	Web Form		

Correspondence: Hello,

Having visited the Big Island many times over the past 22 years, one of the most memorable highlights of my travel experiences was to fly with Paradise helicopters. This is a once in a lifetime experience that must be be experienced. They can take you to parts of the island that is simply inaccessible or to dangerous to travel by ground for reasons you know all too well.

The only part of the operation that I would like to see dialed back for all operators are the flyovers over the falls near Hilo.

Paradise Helicopters has top notch experienced and personable pilots with the skills, quality serviced helicopters, and are very responsible and personally I felt very safe on their tours. I would not think twice about flying with them again and promoting this company to our membership of 20,000 strong, several of whom visit your beautiful and amazing island.

Thank-you, Terry Steinkey Owner - MapTown.com

Correspondence ID:	673 Project: 103522 Document: 118739
Name:	Stachowski, Caitlin L
Received:	Mar,24 2022 22:24:21
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of the public spaces. I have been on a fantastic tour myself previously and would hate to see such an opportunity be made impossible.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	674 Project: 103522 Document: 118739	
Name:	Laidlaw, Tom	
Received:	Mar,25 2022 02:04:02	
Correspondence Type:	Web Form	

Correspondence: Air tours over national parks should be supported because they give important access to people and allow them to see and learn about these special places and our Hawaiian culture and increases respect and advocacy for and appreciation of, in a way that is not damaging the national parks, environment or the communities involved.

Correspondence ID:	675 Project: 103522 Document: 118739	
Name:	McPeak, Kenneth E	
Received:	Mar,25 2022 02:24:06	
Correspondence Type:	Web Form	

Correspondence: I am in favor of much more regulations on the Helicopter Tour Companies flying over the volcano. By a Hawaii tour company CEO, Calvin Dorn, of Paradise Helicopters, he acknowledges that the 10 Helicopter companies and 4 fixed wing air-tour operators are collectively allowed up to 28,441 air tours per year. That computes to 77..92 tours each day of the year. Now how in the world can the native birds and other animals deal with that much noise! Mr. Dorn is also against raising the height limitation of 500 feet. It would seem to me that any reasonable person would be alarmed with a helicopter flying over their head that low. In the event of an unexpected downdraft, what happens if the pilot is not high enough to compensate! Down goes the helicopter and its tourist as well as any people on the ground in the area. Not even to mention a catastrophic fire that could cause damage to vegetation and wildlife. Mr Dorn also alleges that there are some vehicles that make more noise in the park than the helicopters. Don't think that there has ever been 77 or more motorcycles in the park at the same time.

I fully support fewer tour helicopters and at least a 1,500 ft. AGL. Thank you

Correspondence ID:	676 Project: 103522 Document: 118739
Name:	,
Received:	Mar,25 2022 04:26:57
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

Air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

My family and I have had some amazing helicopter flights over Hawaii volcanoes, and it would be very sad to eliminate that possibility.

Correspondence ID:	677 Project: 103522 Document: 118739
Name:	DELLACROCE, Emanuele P
Received:	Mar,25 2022 05:03:31
Correspondence Type:	Web Form

Correspondence: Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Correspondence ID:	678	Project: 103522 Document:	118739
Name:	Cater, Bobbie S		
Received:	Mar,2	5 2022 05:28:12	
Correspondence Type:	Web F	orm	

Correspondence: Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Correspondence ID:	679 Project: 103522 Document: 118739
Name:	Kennon, Michael E
Received:	Mar,25 2022 06:41:44
Correspondence Type:	Web Form
Correspondence: Dear NPS	

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

My family and I greatly enjoy the learning experience that helicopter tours provide. They are not just an amusement park ride. They are very informative and educational. They allow us to go to places we would never be able to get to or see by vehicle or on foot. For example, two of my children were at the time studying Earth Science and being able to survey the recent lava flow that was broadcast around the world was a once in a lifetime experience to see and understand the vents and cracks. Along with that, the pictures and video they captured were brought home and used in each of their classrooms educating even more children and teachers.

Please reconsider restricting helicopter tours and especially Paradise Helicopters. I have found them to environmentally sensitive and a great asset to the residents of Hawaii with the projects and emergencies they provide pilots and air support for that goes well beyond their tour business.. Their pilots, especially Josh Lang are very well tuned into the environment and are great ambassadors of the Hawaiian Islands educating many guests that fly with them.

Sincerely,

Michael Kennon

680 Project: 103522 Document: 118739
Morris, Brandon
Mar,25 2022 07:08:02
Web Form

Correspondence: Dear Park Service Representatives,

I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

I appreciatie your consideration.

Best regards, Brandon Morris

Correspondence ID:	681 Project: 103522 Document: 118739	
Name:	Miller, Randy L	
Received:	Mar,25 2022 07:30:09	
Correspondence Type:	Web Form	

Correspondence: I have reservations regarding the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). These measures are overly restrictive and would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals, if implemented, would negatively impact the Island of Hawaii's economy and would reduce accessibility to our public spaces.

- Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

- Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or

restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. - Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

My air tour over the volcanoes of Hawaii is one of my most fond travel memories. I would hate to think others would be denied the opportunity to experience the same tour.

Correspondence ID:	682 Project: 103522 Document: 118739
Name:	Clark, Dave
Received:	Mar,25 2022 07:35:31
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit.

Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	683	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,2	5 2022 08:01:08	
Correspondence Type:	Web F	orm	

Correspondence: I would like to voice my concern with ATMP policies proposed by the National Park Service for HVNP. These restrictive measure would more or less eliminate air tours over the park or create unsafe policies for pilots. When my family visits Hawaii an air tour is one of our favorite things to do. They are already the most regulated in the country. This is unfair and harmful to Hawaii's economy and these companies and pilots. Please reconsider these policies. Thank you.

Correspondence ID:	684	Project: 103522 Document:	118739
Name:	Krier,	Marion	
Received:	Mar,25 2022 08:29:48		
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

I have used the helicopter services on several of the islands over the years and can attest that they afford the visitors a unique perspective of the Islands that make minimal impact on the environment and provide lifelong memories.

Correspondence ID:	685 Project: 103522 Document: 118739
Name:	Morse, Edward
Received:	Mar,25 2022 09:00:04
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	686 Project: 103522 Document: 118739
Name:	Barley, Steven
Received:	Mar,25 2022 09:14:27
Correspondence Type:	Web Form

Correspondence: Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly,

and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Correspondence ID:	687 Project: 103522 Document: 118739
Name:	Beckstead, Dexter B
Received:	Mar,25 2022 09:15:38
Correspondence Type:	Web Form

Correspondence: My son lives in Kona. Every time I visit him, he along with other family members and friends, make it a point to enjoy the volcanic air tours. If they were to be forced out of business due to excessive regulatory polices, they would be sorely missed. It would also add to the Hilo's Feb 22 unemployment rate of 8.4% and would result in a significant loss in terms of tax for the State and the City of Hilo.

I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	688 Project: 103522 Document: 118739
Name:	Bendfeld, Janice L
Received:	Mar,25 2022 09:34:31
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP

ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	689	Project: 103522 Document:	118739
Name:	Flynn,	Eileen D	
Received:	Mar,25 2022 09:52:37		
Correspondence Type:	Web F	form	

Correspondence: Please keep the helicopters flying! They are a valuable tool used to teach visitors and residents about the park. You see things from the air you could never see from the ground.

Correspondence ID:	690 Project: 103522 Document: 118739	
Name:	Swannack, Art D	
Received:	Mar,25 2022 10:31:09	
Correspondence Type:	Web Form	

Correspondence: I am writing you because I don't like the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). I agree with the air tour agencies that many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. I've flown on these tours and note they are already the most highly regulated in the country. These tours allow safe and non-invasive access to public locations that are not easily accessibile by the public, especially when volcanic activity is unpredictable or even predictable, but the health condition of a member of the public would be challenged by visiting in another manner. I would also note you have international and state based airlines flying in and out of the airport nearby already, so noise concerns should not be an issue. The helicopter pilots stay quite a ways above ground.

I urge you not to implement restrictions which would put these people out of business. Helicopter tours of the islands are a really good way to appreciate the culture and heritage of Hawaii.

Correspondence ID:	691	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,25 2022 11:34:52		
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	692 Project: 103522 Document: 118739	
Name:	Willmann, Karen	
Received:	Mar,25 2022 12:07:40	
Correspondence Type:	Web Form	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Correspondence ID:	693 Project: 103522 Document: 118739
Name:	Willmann, Karen
Received:	Mar,25 2022 12:07:40
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Correspondence ID:	694	Project: 103522 Document:	118739
Name:	Kelly, Patrick		
Received:	Mar,25 2022 12:15:52		
Correspondence Type:	Web Form		

Correspondence: There should be absolutely NO helicopters above these parks. Their beauty which includes their tranquility should be preserved. Helicopters at any height unduly ruin the NPS experience.

Correspondence ID:	695	Project: 103522 Document:	118739
Name:	, NAT	HALIE	
Received:	Mar,25 2022 13:07:42		
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

Air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	696 Project: 103522 Document: 118739		
Name:	Foster, Michael J		
Received:	Mar,25 2022 13:15:52		
Correspondence Type:	Web Form		

Correspondence: We have enjoyed several helicopter tours over national parks during our trips to Hawaii. They have been immensely rewarding and memorable trips that have allowed us to view remote areas and lava flows within the park. We hope future regulations allows helicopter tours of the park in a reasonable and safe fashion.

Correspondence ID:	697	Project: 103522 Document:	118739
Name:	Hamil	ton, Darren M	
Received:	Mar,2	5 2022 14:27:42	
Correspondence Type:	Web F	orm	

Correspondence: The ATMP does not do a good job of explaining how air tours impact the HVNP economically. If people never set foot in the park, how do they impact the infrastructure? Why are tour providers charged for this?

As for noise impacts, if air tours are studied - and air tour fees are used to study the impact of the noise - then all sources of noise in or near the park need to be studied too: vehicles on roads, hikers, Park Rangers, biologists, etc. It seems people trekking through sensitive areas would have a much larger impact on wildlife than rotor noise from half a mile away and just a couple minutes of duration.

The wording of the ATMP is unilateral to only the HVNP's charter. They eliminate many options by saying that is is not in their charter to do so, and yet this precludes any negotiation on specific options without the voice of the very public they supposedly serve. Commercial air tour companies are not joy-riding - they are there because the general public wants to see the park from the air and are willing to pay for it. The HVNP wants to eliminate the ability of the public to see the park. But isn't that the very public whose tax dollars pay for the park to exist in the first place? Any limits need to be more carefully constructed and not so unilateral based on opinions of federal employees who should be working for the the taxpayers and not making their own rules without any discernible checks and balances.

This entire process seems broken as it has dragged on for over 2 decades.

Correspondence ID:	698	Project: 103522 Document:	118739
Name:	Riedlir	n, Frederick	
Received:	Mar,25 2022 14:43:00		
Correspondence Type:	Web F	orm	

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plans for Hawaii Volcanoes National Park.

As an avid outdoorsman and pilot, I have spent much of my life exploring the wonders of our National treasures known as the National Parks. In the last 5 years I have become handicapped and do not have the ability to explore like I once was able to. Helicopter tours provide a vital link to our nature wonders to those of us that are handicapped or too old to hike a trail. Depriving members of the handicapped community access to view the extended beauty of our National Parks that helicopter tours provide is wrong.

I have serious concerns with the development process of the Air Tour Management Plans (ATMP) by the National Park Service (NPS) and the Federal Aviation Administration (FAA). NPS and the FAA have ignored 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. Excluding the NPOAG from providing input on the ATMP process is in direction contradiction of FAA Order No. 1110.138A.

NPS does not have the necessary expertise to fundamentally redesign the airspace over these parks. The ATMPs proposed by NPS would relocate, constrict, and combine flight routes and would make substantial changes to flight altitudes. The current flight routes and altitudes have been in place for years and are well understood by industry. The changes proposed by ATMP have severe aviation safety implications that should have been deliberated in the NPOAG, as Congress intended in the National Parks Air Tour Management Act of 2000.

The proposals currently under consideration will force aircraft into potentially unsafe flight conditions. The NPS has proposed increasing the minimum flight altitude over Hawaii Volcanoes National Park from an allowed minimum 500 feet AGL to 1,500 feet AGL, which does not provide adequate safe options for navigation in typical weather patterns that exist in the park. Even more concerning is that the proposals have fixed narrow flight routes that do not take into account the areas constantly changing weather patterns.

I also have serious concerns with the economic impact these plans will have on helicopter air tour companies. The draft plans' flight allocation numbers do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change and NPS needs to respect that dynamic, as visitors alter their destinations according to those trends.

The NPS has failed to reach out to the operators to enquire what economic impacts might arise implementing a management plan that restricts overflights. Operators are already suffering economically post COVID-19, loosing over 80% of their businesses due to the shutdown of international travel. Further restrictions will cripple an already fragile industry trying to rebuild.

In 2020, Hawaii Volcanoes National Park welcomed 590,000 visitors, a 57% decrease from 2019 when the park welcomed over 1,300,000 visitors. This year many National Parks saw their resources strained by the large number of visitors as the public began to travel again. Air tours are an important option for many visitors conducting a one-in-a-lifetime trip to see famous natural landmarks. Visitors taking advantage of air tours benefit by avoiding traffic, wait times, and walking trails that are inaccessible for the handicapped or elderly, while reducing congestion and demand on park infrastructure.

Like ground-based tours, air tours are a valid part of our visitor experience, providing a unique window from which we can share our cultural, historical and environmental sites with the world. Air tours require no groun

Correspondence ID:	699	Project: 103522 Document:	118739
Name:	van Hes	st, Ina	
Received:	Mar,25	2022 15:16:04	
Correspondence Type:	Web Fo	orm	
Correspondence: Please stop the insane noise and intrusion torture we are subjected to daily.			daily.
I support Option 2, NO FLY.			
Thank you!			

Correspondence ID:	700	Project: 103522 Document:	118739
Name:	Donot	frio, Craig & Linda S	
Received:	Mar,2	5 2022 15:31:40	
Correspondence Type:	Web F	orm	

Correspondence: My wife and I thoroughly enjoyed our tour with Paradise Helicopters over HVPN. It gave us the ability to actually see areas that interested us the most. Once back on the ground, we planned our visit and exploration of the park accordingly, making it a much more memorable and rewarding experience.

We are concerned however about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Kindest Regards, Craig & amp; Linda Donofrio

Correspondence ID:	701 Project: 103522 Document: 118739		
Name:	Burney, Cheryl L		
Received:	Mar,25 2022 15:49:02		
Correspondence Type:	Web Form		

Correspondence: Thank you for the strict and balanced regulations that are currently in place for the benefit and safety of the public, tour companies and their pilots, but most of all to protect the treasure that is Hawaii. However, please, PLEASE carefully consider new constraints on air tour operators.

Hawaii is a paradise like none I have seen and experienced. The chance to view this glimpse of heaven on earth from a tiny bird is a memorable, once in a lifetime experience. In our busy and modern world it is rare indeed to see the wild beauty of the islands from a remarkable vantage point while not disturbing it. The helicopter tour in particular seems the perfect way to protect Hawaii's untamed and untouched natural beauty, while still sharing it. Current restrictions seem to be reasonable in achieving that balance, while protecting a precious treasure, Hawaii.

Again, please carefully consider any new air tour constraints that would limit our ability to experience the treasures of Hawaii.

Sincerely, Lin and Cheryl Burney

Correspondence ID: Name: Received:

702 Project: 103522 Document: 118739Onnis, RobMar, 25 2022 18:16:22

Correspondence Type:

Web Form

Correspondence: I would just like to add that the tour provider, Paradise Helicopters, provided with an experience that was of the upmost professionalism and courtesy with safety as paramount. At no time did we feel we were in any danger or placed in hazardous situations that posed any risks to us, or our other passengers. Accessibility to their services, on and off ground, were very accommodating within the constraints of the vehicle used. During the flight a sustained minimum flight height ensured there were no negative environmental impacts. All in all I would say that the service they provided, and the regulations they were operating under were sufficient to meet the current requirements for a safe, sustainable and environmentally sound experience. Regards

Rob

Correspondence ID:	703 Project: 103522 Document: 118739		
Name:	Leanos, William J		
Received:	Mar,25 2022 18:57:08		
Correspondence Type:	Web Form		

Correspondence: We are concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). These proposed restrictive measures could effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

• Our air tour allowed us to share Hawaii's cultural, historical and environmental sites in a way that required zero ground-based infrastructure at the park. The week we spent in Hilo, was constantly clouded by weather conditions. Our tour never included the National Park because the cloud cover was too low. We flew along the coast and our pilot filled us in on surroundings and the history.

• Air tours are a safe way to experience the park. The current regulations appear to keep it that way, as was stated, we did not ever fly over the park. I believe that forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. We experienced these weather changes the week we were there.

• These further restrictions could cause tour companies to go out of business if they are put in place. This would put a burden on tour families and partner businesses, as well as the operations that air-tour companies support, thus seriously affecting the local economy.

• The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. It is surprising to us that these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Thank you, Bill Leanos and Kathy Auld

Correspondence ID:	704	Project: 103522 Document:	118739
Name:	Sheard	l, Stacy	
Received:	Mar,25	5 2022 18:57:21	
Correspondence Type:	Web F	orm	

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plans for Hawaii Volcanoes National Park.

I have serious concerns with the development process of the Air Tour Management Plans (ATMP) by the National Park Service (NPS) and the Federal Aviation Administration (FAA). NPS and the FAA have ignored 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. Excluding the NPOAG from providing input on the ATMP process is in direction contradiction of FAA Order No. 1110.138A.

NPS does not have the necessary expertise to fundamentally redesign the airspace over these parks. The ATMPs proposed by NPS would relocate, constrict, and combine flight routes and would make substantial changes to flight altitudes. The current flight routes and altitudes have been in place for years and are well understood by industry. The changes proposed by ATMP have severe aviation safety implications that should have been deliberated in the NPOAG, as Congress intended in the National Parks Air Tour Management Act of 2000.

The proposals currently under consideration will force aircraft into potentially unsafe flight conditions. The NPS has proposed increasing the minimum flight altitude over Hawaii Volcanoes National Park from an allowed minimum 500 feet AGL to 1,500 feet AGL, which does not provide adequate safe options for navigation in typical weather patterns that exist in the park. Even more concerning is that the proposals have fixed narrow flight routes that do not take into account the areas constantly changing weather patterns.

I also have serious concerns with the economic impact these plans will have on helicopter air tour companies. The draft plans' flight allocation numbers do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change and NPS needs to respect that dynamic, as visitors alter their destinations according to those trends.

The NPS has failed to reach out to the operators to enquire what economic impacts might arise implementing a management plan that restricts overflights. Operators are already suffering economically post COVID-19, loosing over 80% of their businesses due to the shutdown of international travel. Further restrictions will cripple an already fragile industry trying to rebuild.

In 2020, Hawaii Volcanoes National Park welcomed 590,000 visitors, a 57% decrease from 2019 when the park welcomed over 1,300,000 visitors. This year many National Parks saw their resources strained by the large number of visitors as the public began to travel again. Air tours are an important option for many visitors conducting a one-in-a-lifetime trip to see famous natural landmarks. Visitors taking advantage of air tours benefit by avoiding traffic, wait times, and walking trails that are inaccessible for the handicapped or elderly, while reducing congestion and demand on park infrastructure.

Like ground-based tours, air tours are a valid part of our visitor experience, providing a unique window from which we can share our cultural, historical and environmental sites with the world. Air tours require no ground-based infrastructure at the park, which allows visitors accessibility without the need for roads, trails, signs, bathrooms, garbage cans, or other services.

By further restricting an already limited number of allowable air tours, we are reducing opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance. Through carbon-offset efforts and strict altitude requirements to control noise just to name a few efforts air-tour operators are working to ensure they are responsi

Correspondence ID:	705 Project: 103522 Document: 118739
Name:	Sarbin, Barbara G
Received:	Mar,25 2022 19:05:37
Correspondence Type:	Web Form

Correspondence: Aloha! As an outdoor educator at the Volcano School of Arts & amp; Sciences, and as the Director of a nonprofit that brings children out onto the trails, farms, agroforests and gardens of the Big Island, I am very concerned about the increase in air traffic, especially helicopters. The research has already been done by very reputable local organizations to show the impact of the anthrophone (human-made noise) on wildlife. I am aware of several studies that prove that the noise of airplanes and helicopters cause changes in behavior in native birds, and as their populations are already tanking, I would think that preserving the environment and wildlife would take precedence over the tourist industry profits. I am horrified at the idea that 11,376 helicopters per year

could fly over Volcano School, not to mention along the highway or the coast. My suggestion is to limit helicopter traffic to research only, and send the tourists on hikes, bike rides, walks, and vehicles that travel on the road. I do not believe that it fits with Hawaiian values and principles to increase the helicopter traffic, and it's not better to do this along the highway or the coast. I am only in support of limiting helicopter traffic to a minimum, only as needed for research or military or police work. Please look for alternatives to sending helicopters over our schools, parks, and coastlines. Aren't we supposed to be weaning ourselves from fossil fuels anyway to help reduce CO2? Wouldn't electric helicopters or solar-powered planes be quieter? Please, let's look for alternatives to the problem at the source, not to putting the helicopters in some one else's neighborhood and making it an SEP (someone else's problem). Mahalo!

Correspondence ID:	706	Project: 103522 Document:	118739
Name:	Mills, Carey		
Received:	Mar,25 2022 19:07:37		
Correspondence Type:	Web F	orm	

Correspondence: Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Correspondence ID:	707 Project: 103522 Document: 118739
Name:	Lowry, Jody M
Received:	Mar,25 2022 19:39:44
Correspondence Type:	Web Form

Correspondence: Hawaii air tours are already the most regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

I urge you to consider Hawaii's air-travel operations in the HVNP ATMP. The ATMP will affect the communities, flight safety, the sstate's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	708 Project: 103522 Document: 118739
Name:	Pierotti, Rebecca M
Received:	Mar,25 2022 20:36:48
Correspondence Type:	Web Form

Correspondence: Current air tours should go under more stringent regulation. In an ideal world, aviation tours would be completely banned from flying in and within a significant radius of Hawaii Volcanoes National Park. The frequency of current tours is not acceptable for residents, wildlife or visitors, and is a significant source of disturbance and noise pollution. Encountering low flying aircraft in the Backcountry and Wilderness (Mauna Loa, more remote coastal areas, Nāpau) is definitely unacceptable. The ones I see most often are the Blue Hawaii helicopters.

Correspondence ID:	709	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,25 2022 21:15:51		
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Correspondence ID:	710 Project: 103522 Document: 118739
Name:	Rosenthal, Andrew
Received:	Mar,26 2022 04:01:13
Correspondence Type:	Web Form

Correspondence: Helicopters and other noisy and polluting aircraft have no place in or around our National Parks. The numbers of people flying is dwarfed by the number of people disturbed by these flights. If you do a real fair economic analysis, this industry is a loser for the United States people. This is also an environmental justice issue. People with less money are less likely to take a flight and more likely to be impacted by them. Lastly, with climate change impacting the planet, we should be discouraging nonessential gas guzzling activities. Please ban ALL nonessential flights, Option 2. A complete ban will be much easier to enforce than the other alternatives. Thank you.

Correspondence ID:	711 Project: 103522 Document: 118739	
Name:	Lawson, Heather L	
Received:	Mar,26 2022 04:42:55	
Correspondence Type:	Web Form	

Correspondence: Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

Correspondence ID:	712	Project: 103522 Document:	118739
Name:	Goldschmidt, Nicole		
Received:	Mar,26 2022 05:26:14		
Correspondence Type:	Web F	form	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

Air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher

altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	713 Project: 103522 Document: 118739
Name:	Bonsack, Gerald A
Received:	Mar,26 2022 07:51:37
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	714	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,2	5 2022 08:08:21	
Correspondence Type:	Web F	orm	
Correspondence: Less government and less restrictions is what this country needs. Don't control me bro.			n't control me bro.

Correspondence ID:	715	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,26 2022 09:22:37		
Correspondence Type:	Web F	form	

Correspondence: Being a frequent visitor to Hawaii we have had the opportunity to see much of the islands. None of our sight seeing has been as enjoyable as seeing many of your pristine sights from a helicopter. The

opportunity to see these sights without damaging the islands natural beauty should not be limited by regulations that restrict people from enjoying your beautiful island.

By restricting these flights we enjoy and from the well phrased letter shows the concerns of one of your local companies.

• Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

• Air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

• Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

• Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Correspondence ID:	716	Project: 103522 Document:	118739
Name:	Rice, Joseph R		
Received:	Mar,26 2022 09:38:07		
Correspondence Type:	Web F	form	

Correspondence: We would like to see helicopter tours continue to be permitted about as they are currently. Our family did a helicopter tour a few years ago and very much enjoyed it. The area did not seem crowded and I don't recall seeing another helicopter during our tour. The company appeared to be well run and respected the environment. It was a great way for our family to appreciate the beauty of the area and support the local economy. We support reasonable regulations that protect the environment and respect the quality of life of those who live in the area, but hope a balance can be maintained or found. Thank you.

Correspondence ID:	717	Project: 103522 Document:	118739
Name:	Rennefahrt, Petra		
Received:	Mar,26 2022 11:07:05		
Correspondence Type:	Web F	orm	

Correspondence: Dear ladies and gentlemen,

No matter I live in Germany, I'm really interested what happens in Hawaii. Hawaii is our most valuable vacation destination.

I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated Sincerely Petra Rennefahrt

Correspondence ID:	718 Project: 103522 Document: 118739
Name:	Merrique, Robert M
Received:	Mar,26 2022 11:14:38
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	719 Project: 103522 Document: 118739
Name:	Meyers, Barry M
Received:	Mar,26 2022 11:59:57
Correspondence Type:	Web Form

Correspondence: I am commenting in support of Alternative #2.

In March, 2022 I traveled to Volcanoes National Park with one of my goals to hike the Kilauea Iki trail and other park trails. On Tuesday, March 8, 2022 my spouse, two companions and I started the Kilauea Iki hike. Almost immediately the quiet nature of the hike was interrupted by the loud noise from helicopters and fixed wing aircraft. These sounds continued for the duration of the hike. Our ability to experience and enjoy the beauty and sounds the hike offered were greatly interfered with by these loud aircraft noises. After completing this hike, we decided not to do any additional hikes in the park due to the aircraft noise.

Allowing aircraft flights within Volcanoes National Park (and other national parks) violates the mission of the National Park Service which is to preserve unimpaired the natural and cultural resources and values of the National Park Service for the enjoyment, education and inspiration of this and future generations.

The flights by helicopters and fixed wing aircraft only benefit a few individuals while disturbing and disrupting the enjoyment of the parks for a far larger number of visitors.

Correspondence ID:	720	Project: 103522 Document:	118739
Name:	labarth	e, frederic	
Received:	Mar,26	2022 12:04:36	

Correspondence Type:

Web Form

### Correspondence: Suggested comments:

I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	721	Project: 103522 Document:	118739
Name:	Hoover, David J		
Received:	Mar,26 2022 12:19:11		
Correspondence Type:	Web Form		
Correspondence: I think all sight-seeing fligh	: I think all sight-seeing flights over HVNP should be banned.		

Correspondence ID:	722 Project: 103522 Document: 118739		
Name:	Ly, Tina		
Received:	Mar,26 2022 12:34:50		
Correspondence Type:	Web Form		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

Air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	723 Project: 103522 Document: 118739
Name:	Watson, Michaela
Received:	Mar,26 2022 12:35:31
Correspondence Type:	Web Form

Correspondence: The Big Island of Hawaii is home to ten of the 13 different climate zones. This and our active volcano make the Big Island one of the most unique places in the world to visit. Air tours are able to show the diversity and beauty of Hawaii in a way that other tours can't. Along with our diversity we face ever changing weather patterns. These weather patterns are known by air tours pilots. Changing the area that pilots are allowed to fly will force pilots into making uncomfortable decisions in the event of poor weather. Clouds change quickly over volcano national park. By restricting the area for air tours, pilots are faced with making quick weather decisions with little flexibility. This is extremely dangerous. Please allow air tours to operate as they see fit. Let them continue to show the beauty of Hawaii Island.

Correspondence ID:	724 Project: 103522 Document: 118739
Name:	Leigh, Mondy and Sylvia
Received:	Mar,26 2022 15:39:09
Correspondence Type:	Web Form

Correspondence: We were very fortune to take the Helicopter Tours over 3 of the Hawaiian Islands. Each Island had it distinguished landmark and its unique charm. Not only do you get to see most of the Island and its uniqueness and beauty you learn much more by the added comments from the pilots. With that you learn so much more about each island and you can also appreciate the unique culture of the Hawaiian' Islands. I can't tell you how excited I was that I was going to have the opportunity to fly over a volcano in the Big Island. My anticipation was met with satisfaction. This has been a moment of my lifetime that I will treasure always. Flying over Oahu was also so awesome because so much information about this island itself. How many of my favorite movies filmed here? So much of the island was meaningful to my life. In comparison, had we drove around the Island, the most we would have gotten from the road trip was to experience the beauty of each island. There would be no added information to add the value of the islands and its unique culture. And you would not have really seen all of the island. The mountains, waterfalls, volcanos and so much more like important history moments. Fron what I have witnessed the Helicopter tour industry is very regulated to begin with. Also, I learned how the native people are complaining about the infringes to their religious believes. I find this so ironic because if helicopter tours flying over the island is violating their religions believed, then military planes and satellites should not fly over the island either. The Islands live in a 20-century society and enjoy the comforts that it offers, so then do they prefer to not live a world or modern technology? Let's face it, there is only 2 industries that support the islands, one is the military and the second is Tourism. By what we could see, Tourism is the only employment that really supports the Hawaiian Livelihood.

One of the most emotionally touching moment to me, was when we flew down the middle of Oahu Island and the pilot informed us that this was the exact route the Japanese took on December 7 to Pearl Harbor.

One can only imagine what the people were going to face when these airplanes flew over the Harbor. To think how many men and women would die and others be entombed in their ships, I am just at loss of words even to this day. I honestly believe that all visitors to the Islands should have the opportunity to experience this as a part of our history and also the beauty of the Islands. This could only be accomplished by taking the Helicopter tour over the Hawaiian Islands. We are so blessed that we had this opportunity and treasure the memories. Please consider the Helicopter Tours as vital to Hawaiian Islands and the visitors that visit these great Islands.

Correspondence ID:	725	Project: 103522 Document:	118739	
Name:	Greene, Greg			
Received:	Mar,2	6 2022 16:07:31		
Correspondence Type:	Web F	orm		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	726	Project: 103522 Document:	118739
Name:	Wonderling, Susan		
Received:	Mar,26 2022 16:42:53		
Correspondence Type:	Web F	orm	

Correspondence: I have been made aware that you are considering restrictions on the Hawaii Helicopter Tour Companies. I would like you to know that my daughter and I visited 4 of the Hawaiian Islands a few years ago. We took a helicopter tour on each island. For me, those flights were the highlight of my trip, especially being a pilot myself. I am well aware of all of the current rules and regulations already imposed on your fine Pilots. Please don't further add to their frustrations by adding more restrictions. They do an amazing job of keeping passengers safe and well informed of so much HI has to offer visitors such as myself. I think pushing more regulations on them could potentially push them out of business. I went to HI hoping to see every square inch of it - and I can only imagine other visitors feel the same. It is still the most beautiful place on Earth, and visitors want to experience that!

Correspondence ID:	727	Project: 103522 Document:	118739
Name:	Weitzel, Leslie		
Received:	Mar,26 2022 17:23:54		
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. The helicopter tour we took while visiting Hawaii was my favorite part of our trip. It is a unique experience to view an active volcano and the beautiful landscape that is Hawaii. It is my understanding that further restrictions on the air tours industry would negatively affect the industry in the following ways:

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Please withhold my personally identifiable information from public view.

Correspondence ID:	728	Project: 103522 Document:	118739
Name:	Correa Londono, Esteban		
Received:	Mar,26 2022 22:43:15		
Correspondence Type:	Web F	orm	

Correspondence: Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Correspondence ID:	729	Project: 103522 Document:	118739
Name:	Marshall, Ryan		
Received:	Mar,26 2022 23:36:37		
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

Air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	730	Project: 103522 Document:	118739	
Name:	Flynn, Maria C			
Received:	Mar,27 2022 04:22:15			
Correspondence Type:	Web F	orm		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	731	Project: 103522 Document:	118739	
Name:	Palmer, Mark S			
Received:	Mar,27 2022 05:47:47			
Correspondence Type:	Web F	orm		

Correspondence: I am a frequent overseas visitor to Hawai'i. Before the pandemic I visited annually and on each visit have enjoyed a helicopter ride over the volcano and other parts of the island. I understand the importance of preserving and safeguarding the natural environment on the island and respecting the impact of tourists like myself on wildlife, natural resources and cultural sites. I have noted that the pandemic has had a huge impact on businesses on the island and has highlighted that income from tourism is essential to a viable economy that can continue to invest in the island's infrastructure.

I have to say that on my visits to the national parks i have never found other people's helicopter trips to be intrusive or disturbing and I wonder whether some negative comments have been taken out of proportion to meet a predetermined agenda. Have you undertaken an actual evaluation of noise impact? i see nothing in your report to indicate any real life measurements of decibels of noise or measurable impacts on wildlife. I am a bird watcher and have enjoyed guided tours of sites where the island's endemic species can be seen but noise impact from

helicopters does not seem to be high on conservationists's concerns.

So i would question whether the underlying reasons for suggesting changes to flying routes and times as outlined in your report is based on scientific observations or solely being driven by political agendas. While i would support measures that mitigate actual, measurable environmental impacts my concern is that the options proposed would reduce the attractiveness of the islands to tourists and potentially reduce tourist numbers thus having a more significant and potentially harmful impact on the health and prosperity of the island as a whole.

Correspondence ID:	732	Project: 103522 Document:	118739
Name:	Cuprik	s, David	
Received:	Mar,27	2022 07:22:36	
Correspondence Type:	Web Fo	orm	

Correspondence: To Whom It May Concern:

As someone who has learned to appreciate the tremedous beauty of Hawaii from the air, I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	733 Project: 103522 Document: 118739
Name:	Vinson, Michelle
Received:	Mar,27 2022 08:30:31
Correspondence Type:	Web Form

Correspondence: I am a 63year old and have an 87-year-old mother. We had the pleasure of an air tour with Paradise Helicopters. If not for this service, we would not have had a truly fantastic experience, with awesome views that can only be seen from the air-if you are handicapped. At the time the volcano had not irrupted and we had fantastic view of the crater. Let's face it the islands do not have a lot of roads and you cannot get the true scope of the island unless you see it from the sky. Road trips or bus tours as stated below have a bigger impact on the environment with, road maintenance, air pollution, waste from littering tourists and actually probably more noise pollution than a helicopter. One needs to look at the long-term consequences of these actions as it affects the environment (of course) as well as the economic repercussions. My son, grandchildren, and 90 year old grandmother-in-law will be visiting Hawaii next month and I encouraged them to try a helicopter experience as there is no way they can be in a car for hours at a time. I concur with following point below.

I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or

introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Correspondence ID:	734	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,2	7 2022 08:39:11	
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Best regards D.K.

Correspondence ID:	735	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,2	7 2022 13:04:02	
Correspondence Type:	Web F	form	

Correspondence: Air tours are a safe and awesome way to experience the park. But making pilots fly in fixed narrow routes and at higher altitudes than currently allowed will make flying less safe! The Weather patterns in the National Park are unique and unpredictable, and pilots need flexibility to make safe decisions and options for choosing their routes and altitude! Thank You! Brad Bickford

Correspondence ID:	736	Project: 103522 Document:	118739
Name:	Dbdjjd	dj, Djdjxj	

Received:

Mar,27 2022 14:42:28

Correspondence Type:

Web Form

Correspondence: Dbtbffbbb fevers

Correspondence ID:	737	Project: 103522 Document:	118739	
Name:	Carol, Fahy			
Received:	Mar,27 2022 15:06:27			
Correspondence Type:	Web F	orm		

Correspondence: That seems like way too many flights in a year! 20,000 plus....I think was the number

I would like to see flights limited to a time of day, like 10am-3pm....so that the Park visitor could enjoy quiet the rest of the period of the day. It is always noticeable when planes are flying overhead even when they are in the distance.

By limiting flights, the price goes up and the pilot will actually make more money per flight thus keeping his or her income the same.

Special exceptions should be made for flights that take photographers and scientists up. Not sure what exceptions but they should perhaps be allowed more flights than tourist flights .....

That's my take on it! I love Volcano NP!

Correspondence ID:	738	Project: 103522 Document:	118739	
Name:	Carrothers, David			
Received:	Mar,27 2022 15:17:42			
Correspondence Type:	Web F	orm		

Correspondence: I visit the park frequently with my wife. We also bring friends who are visiting from elsewhere. We are all bird watchers and have been disappointed with the amount of helicopter noise we have to contend with to locate endemic birds for viewing or hearing. While Alternative 4 guarantees one quiet day per week, that day may not work with our off island friends schedules. No Alternative was generated that has an every other quiet day which could be worked into our visiting schedules. Therefore, I support Alternative 2.

Maholo

Correspondence ID:	739 Project: 103522 Document: 118739
Name:	Ternus, Amber
Received:	Mar,27 2022 15:28:44
Correspondence Type:	Web Form

Correspondence: I do not support any commercial helicopter activity over Hawaii volcano national park. The park has many accessible areas for viewing and enjoyment for those unable to hike. The helicopter tours cause great disruption to local park users, animals, and lower the quality of life for those living below the flight paths. The extreme noise takes away from the enjoyment of our properties! These disruptive helicopter flights benefit very few (wealthy visitors) and cause loss of enjoyment for so many (residents). Please protect our natural resources and say NO to any commercial helicopter activity in the park!

Correspondence ID:	740	Project: 103522 Document:	118739	
Name:	Camp, Carissa			
Received:	Mar,27 2022 15:54:04			
Correspondence Type:	Web Fo	orm		

Correspondence: Please protect the air space over the Park. Keep restrictions as tight as possible to protect the enjoyment of the majority of people on the ground. As a frequent visitor of Yellowstone National Park, I appreciate the air space restrictions that keep disturbances to a minimum.

Correspondence ID:	741 Projec	ct: 103522 Document:	118739	
Name:	McFarland, Ian C			
Received:	Mar,27 2022 16:00:36			
Correspondence Type:	Web Form			

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	742 Project: 103522 Document: 118739
Name:	, Kenneth
Received:	Mar,27 2022 17:10:24
Correspondence Type:	Web Form

Correspondence: Aloha,

I do not agree with the measures of the proposed ATMP. This could negatively impact our helicopter tour industry in Hawai'i by directly singling out Helicopter tour operators. Thus, this will force helicopter companies to redirect their tours into other communities which may disrupt them, which could cause many complaints. Therefore, the tour busses should be unable to run as they produce just as much if not more noise. Air tours are a safe and non invasive way to experience the park. By limiting air tours, this will cause heavy wear and tear on the park and increase the amount of foot traffic in the park. This foot traffic will cause a direct detrimental impact upon the parks endangered native species. As a Volcano National Park hiker and resident of Volcano, i'm unaffected by the helicopter noise, when you are in the park you rarely hear the helicopters more so the tour busses.

Welina me ke aloha

Correspondence ID:	743	Project: 103522 Document:	118739
Name:	Wilke	, Rebecca	
Received:	Mar,2	7 2022 18:47:07	
Correspondence Type:	Web I	Form	

Correspondence: Helicopters destroy the serene quiet and cover the noises of wildlife that you to to Haleakala to enjoy. We are avid hikers and backpackers and other hikes we have done on this Hawaiian Island and others have been marred by roar of helicopters flying overhead like clockwork every 30 minutes. It was really disappointing. Please enjoy the island in a way that's respectful and doesn't disturb the experience of everyone else.

Correspondence ID:	744	Project: 103522 Document:	118739
Name:	Debra	, Whiteflower	
Received:	Mar,2	7 2022 19:03:31	
Correspondence Type:	Web F	orm	

Correspondence: Please, no air traffic over the Park. Keep nature undisturbed. Only air traffic for scientific study.

Correspondence ID:	745	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,2	7 2022 20:15:20	
Correspondence Type:	Web F	orm	

Correspondence: The noise from the aircraft noise over the crater are really loud, we couldn't get a peaceful break from the noise every time visiting the summit, I wonder if nene and birds feel the same way. I suggest the airplanes fly at least 4000-5000 feet above the ground to reduce the noise and also limit tour time in the Park.

Correspondence ID:	746	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,2	7 2022 20:36:31	
Correspondence Type:	Web F	orm	

Correspondence: I would like to see commercial air traffic restricted from the area around the park. It would be nice to enjoy the park setting without the disturbance of aircraft. Let's do the best we can by our parks and respect the land and its resources! Thank you.

Correspondence ID:	747	Project: 103522 Document:	118739
Name:	Boyle, John		
Received:	Mar,2	7 2022 21:57:45	
Correspondence Type:	Web F	orm	

Correspondence: Keep the same permissions and restrictions.

Correspondence ID:	748	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,27	2022 22:13:50	
Correspondence Type:	Web Fo	orm	

Correspondence: It would be best to partner with the air tour operators who would be effected by an ATMP for alternative ATMP plans, seeing as it is their livelihood that will be impacted. The air tour operators would be able to provide input on preferred flight routes, altitudes necessary for safety, and methods of cooperation with NPS. Please seek their input and develop another ATMP alternative.

Correspondence ID:	749	Project: 103522 Document:	118739
Name:	stringe	er, samantha L	
Received:	Mar,2	7 2022 23:37:18	
Correspondence Type:	Web F	Form	

Correspondence: Aloha

Every time I visit the beautiful islands of Hawaii, I am sure to have an incredible helicopter flight.

Paradise Helicopters have been amazing . My last visit on the Big Island on Valentine's Day (as I'm single sadly) I would have been in the co-pilot seat.

The trip was cancelled due to vog.

The crew are respectful and professional and keeping to safety precautions...-as much as I wished trip /flight would have gone ahead...

I hope and pray helicopters trips will always be available now and in the future.

I would understand the sound would bother locals but they need to remember locals rely on tourism and bringing money and jobs to the area.

Mahalo

Samantha Stringer

Correspondence ID:	750 Project: 103522 Document: 118739
Name:	Yamich, Kara
Received:	Mar,28 2022 07:15:06
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	751 Project: 103522 Document: 118739
Name:	D'Andrea, Nino
Received:	Mar,28 2022 07:39:57
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours

over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

Air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

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Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

752	Project: 103522 Document:	118739	
Coope	r, Linda J		
Mar,28	3 2022 09:02:53		
Web F	orm		
Correspondence: A fantastic trip over the volcano, would highly recommend			
	Coope Mar,28 Web F	Cooper, Linda J Mar,28 2022 09:02:53 Web Form	

Correspondence ID:	753	Project: 103522 Document:	118739
Name:	Murray	y, Michael B	
Received:	Mar,28	2022 10:32:42	
Correspondence Type:	Web Fo	orm	
Correspondence: ELECTRONIC TRANSMIS	SSION -	NO HARD COPY TO FOLLOW	
March 28, 2022			
Ms. Rhonda Loh Superintendent Hawaii Volcanoes National Park P.O. Box 52 Hawaii National Park, HI 96718 Subject: Potential Air Tour Management Plan (A	ATMP) A	Alternatives for Hawaii Volcanoes	National Park
Subjeet. I Stendar I in Tour Management I fan (1		internatives for flawait volcanoes	

Dear Superintendent Loh:

I am writing on behalf of over 2,100 members of the Coalition to Protect America's National Parks (Coalition), who collectively represent more than 40,000 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 Hawaii Volcanoes National Park (HAVO), as described in the Newsletter at: https://parkplanning.nps.gov/document.cfm?parkID=307&projectID=103522&documentID=118739.

## GENERAL COMMENTS

1. First and foremost, we greatly appreciate that HAVO is conducting a proper planning process 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: In announcing your plans to prepare an environmental assessment (EA) of potential impacts of air tours at the park, you have invited public comment on potential alternatives, and you have identified a range of alternatives including at least one that would significantly reduce the level of impacts caused by the current level of air tours. Presumably, the EA will disclose, evaluate, and compare the various environmental impacts of those alternatives in order to provide the basis for a reasoned decision about the appropriate level of air tours, if any, at HAVO.

In essence, your approach to conducting this ATMP planning process is consistent with applicable CEQ and NPS guidance and makes good sense to us. We applaud you and the planning team for doing the right thing and following the applicable process requirements that this proposal deserves.

2. The proposed HAVO environmental assessment (EA) demonstrates it is feasible for NPS to consider a range of air tour management alternatives and disclose and evaluate their potential impacts while conducting a legitimate level of NEPA review of those alternatives: This begs the question - Why did NPS not do the same thing at all the other parks that have already issued proposed ATMPs? As a practical matter, all 23 proposed ATMPs are being prepared under the same National Parks Air Tour Management Act requirements and the same court order; so what is the NPS rationale for complying with basic NEPA requirements in only a few cases (e.g., HAVO and HALE) but not in many others?

In stark contrast to this EA, all other NPS proposed ATMPs issued to date have inexplicably failed to consider a range of alternatives, including some that would reduce the level of impacts caused by the current level of air tours. Those ATMPs proposed the current level of air tours as the only management option being considered (which is, in effect, the No Action Alternative). In addition, all of the previously issued proposed ATMPs failed to disclose or evaluate potential environmental impacts of the respective proposed actions.

We ask NPS to explain its basis for deciding to prepare EAs for only a few parks while not considering any alternatives to the proposed action and without disclosing the impacts of the proposed action for many other parks where the agencies have been ordered to prepare ATMPs.

3. The 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: "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." See NPS Management Policies 2006 Section 1.4.1. 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 the EA is 100% about 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 fully expected that the NPS conservation mandate, derived from the Organic Act of 1916, would 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, if any.

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.

4. The newsletter fails to identify management objectives related to the development of the ATMP other than compliance with the National Parks Air Tour Management Act of 2000. It also fails to mention the park's 2016 General Management Plan (GMP), which specified general objectives regarding the management of air tours at HAVO: The 2016 GMP identified a number of management objectives related to commercial air tours. See "Soundscapes and the Acoustic Environment" on p. 47 at:

https://www.nps.gov/havo/learn/management/upload/Hawaii-Volcanoes-General-Management-Plan\_2016\_508.pdf.

The GMP discussion of ATMPs includes the following information:

- The NPS, as a cooperator with the FAA, will complete an ATMP/ EIS that will develop measures to limit or prevent any significant impacts that may be caused by commercial air tour operations upon the natural and cultural resources or visitor experiences at the park. This plan will be consistent with the guiding principle of reducing noise/human sound in sensitive areas.

- To improve soundscapes and the acoustic environment, the park will expand active management practices to include: (1) implementing best management practices to limit the duration of artificial noise, (2) maximize humancaused noise free periods, (3) create more opportunities for visitors to experience natural soundscapes, and (4) implement partial closures of air space in sensitive areas. In addition, park operations and projects will be implemented using best management practices to minimize noise impacts.

- The park will strive to improve soundscapes and the acoustic environment by reducing artificial noise within wilderness; in and near critical habitat for threatened and endangered species; in traditional cultural areas such as volcano summits, active lava, or active volcanic features; and in high visitor use areas.

- The GMP also recommends the implementation of a soundscape monitoring program and will consider developing a soundscape management plan, if additional guidance is needed.

Consistent with the above information from the 2016 GMP, we request that the forthcoming EA/plan include the following:

- Adoption of the park GMP's objectives regarding commercial air tour management.

- Practical, measurable resource protection objectives, along the lines of desired future conditions (DFCs), which when combined with systematic monitoring can be used as the basis for future evaluation of the effectiveness of the plan in accomplishing its resource protection goals.

- A description of the soundscape monitoring program referenced in the GMP.

- An explanation why NPS is not preparing an EIS as indicated in the 2016 GMP.

5. 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) does not mandate that commercial air tours are to occur over units of the National Park System. 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." In other words, 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) Hawaii Volcanoes National Park. We therefore request that the EA include an appropriate use analysis as described in Management Policies Section 1.5.

6. The EA should also 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."

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." Management Policies 1.4.7.1. (Emphasis added) 7. The EA should identify its preparers as well as the respective roles of the NPS and the FAA in the NEPA process: The newsletter solicits public comments that can be submitted electronically, presumably to NPS, via the park's PEPC website; or in writing (i.e., hard copy), presumably 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 it typically does whenever it serves as a cooperating agency. Despite NPS's tendency to be passively involved, the NEPA implementing regulations provide for a cooperating agency to play a more active role in the planning process and we strongly encourage NPS to do so in this process. 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."

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 national park resources and values at HAVO, 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. Purpose and Need (p. 3): The Purpose and Need, as written, makes sense to us. The Need statement, in particular, is very well written and should serve as a model Need statement for all other park ATMPs.

2. Resources for Consideration in the EA (p. 3): The proposed list of impact topics appears complete to us. The impact analysis for each topic should include a discussion of available data, such as ambient sound surveys, as well as a review of relevant scientific literature related to the impacts of aircraft noise on specific resources. While this seems like we are stating the obvious, since NONE of the other proposed ATMPs released thus far contained any such information, we feel we need to say it here.

3. Reference materials to consider when preparing the respective impact analyses include the following:

- 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/wpcontent/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/wpcontent/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/wpcontent/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 an d\_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

- HAVO Baseline Ambient Sound Levels 2003: https://irma.nps.gov/DataStore/DownloadFile/555069

- HAVO Acoustical Monitoring Report 2013: https://irma.nps.gov/DataStore/DownloadFile/595833

While the above list is by no means complete, all of the materials listed above are available via links found on the NPS Natural Sounds Program website at: https://www.nps.gov/subjects/sound/index.htm. However, since NONE of this reference material was mentioned in ANY of the proposed park ATMPs issued to date, we feel it is necessary to call this information to your attention now.

4. Alternative 1 - No Action (p. 9): Alternative 1 represents a continuation of what is currently flown and/or allowed under existing law including each company's Interim Operating Authority (IOA) as granted by the FAA (70 Federal Register 36456 (June 23, 2005). As stated on p. 9, "[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)

The newsletter also states that the average number of air tour numbers conducted from 2017 to 2019 is 11,376. However, as described under the no action alternative, operators could fly up to the IOA limit of 26,664 air tours per year. One would reasonably expect that the severity of impacts could be quite different between 11,376 flights per year vs. 26,664 allowable under IOAs. As a result, it is unclear from the newsletter what level of air tours (i.e., how many per year) NPS would consider as the baseline level of use for the impact analysis or if NPS would evaluate the full range of impacts for both the lower and the higher number of possible flights per year.

It would be unreasonable for NPS to evaluate alternative 1 based on the maximum hypothetical number of flights of 26,664, since that number has not been occurring and there is no data documenting the actual impacts of such a high number of flights. On the other hand, there should be data documenting the actual impacts of 11,376 flights per year, which would provide a solid basis of comparison with proposed alternatives 2-4.

We strongly recommend that NPS use 11,376 flights per year (not 26,664) as the baseline for its analysis of impacts for Alternative 1.

5. Range of action alternatives (pp. 13-25): Alternatives 2-4 appear to provide an adequate range of alternatives as required by NEPA. That said, alternatives 3 and 4 are substantially similar, with subtle differences and likely similar overall impacts. For example, both 3 and 4 would allow up to 11,376 air tour flights annually (or as stated in the newsletter "above 1 and below 11,376"), which is essentially the current number of air tours based on the average in 2017-2019. We suggest that the Annual/Daily Number of Flights allowed under alternative 3 be revised to "above 1 and below 5,688" (i.e., half of the current level). This would ensure differentiation in the respective levels of potential impacts caused by alternatives 3 and 4 and provide a more diverse range of alternatives for the agencies and public to consider. See Comment # 7 below.

6. Minimum altitudes proposed for alternatives 3 and 4 (p. 24): Both alternatives would require air tours to fly at a "Minimum 1,500 ft. AGL; minimum 2,000 ft. AGL over wilderness areas and sensitive sites." We question whether these altitudes are sufficient to minimize noise impacts over national parks and wilderness, and ask that you explain/justify the basis for the selected altitudes in the EA. For example, what guideline(s) or studies can you point to that would support the selected minimum altitude(s)?

We recommend that you consider the following guidance indicating that minimum altitude for air tours, in general, at HAVO in all locations should be at least 2,000 feet AGL (not 1,500 feet as proposed):

- 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

- NPS has adopted AC No. 91-36D's recommendation on its "mitigating the impacts of aircraft" webpage, which states: "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.

- Numerous other federal land and marine sanctuary management agencies have similarly adopted 2,000 feet AGL

as the recommended minimum altitude for aircraft flying over federally protected areas.

- NPS has presented no justification for proposing to deviate significantly from the longstanding minimum altitude standard of 2,000 feet AGL.

- Lastly, we are not aware of other studies or guidance proposing a specific minimum altitude over wilderness. We therefore support FAA AC No: 91-36D's recommendation that aircraft fly at least 2,000 feet AGL over wilderness.

7. Annual/Daily Number of Flights (p. 24): Both alternatives 3 and 4 would allow " above 1 and below 11,376 flights per year, dependent on modeling." We note with concern that 11,376 air tour flights annually is the average number of flights that occurred at HAVO in 2017-2019. In other words, under both alternatives there would/could be NO MEANINGFUL REDUCTION IN THE NUMBER OF AIR TOURS COMPARED TO THE CURRENT AVERAGE. In addition, both alternatives are extremely vague about how such modeling would work; what criteria would be factored into the model(s); and what would be the desired future conditions (DFCs). Presumably, if both alternatives were to use the same modeling criteria and DFCs, both could likely end up with the same or similar number of air tours allowed annually.

In reviewing the Summary of Alternative Elements table on pp. 24-25 of the newsletter, there are a number of subtle differences between alternatives 3 and 4 (e.g., slight differences in the number of routes, time of day, etc.). However, in general the two alternatives are substantially similar in the variety and degree of operating conditions being proposed and likely would result in similar overall impacts. As a result, the range of alternatives NPS proposes to consider is actually more limited than it would appear by the total number of preliminary alternatives NPS has identified.

In order to ensure a more robust range of alternatives, we strongly encourage NPS to create a greater degree of difference(s) between alternatives 3 and 4, so that their potential impacts are likewise more distinguishable. We recommend that alternative 3 be revised by reducing the number of flights allowed annually to "above 1 and below 5,688 flights per year, dependent on modeling." (Note: 5,688 is half of 11,376.) This revision would provide a more diverse range of alternatives for the public to consider that would be clearly differentiated by the overall impacts each alternative is likely to cause.

8. Proposed new alternative based on "A Framework to Reduce the Effects of Air Tour Noise on Wilderness": We recommend that you create an alternative based on "A Framework to Assess the Effects of Commercial Air Tour Noise on Wilderness" proposed by McKenna et al in 2015. See: https://winapps.umt.edu/winapps/media2/leopold/pubs/912.pdf

The framework proposes that air tour noise impacts over wilderness can be managed and minimized by adjusting the following key factors: area of audibility; percent time audible; and percentage of the year with overflights. The framework can be used to characterize the existing level of air tour impacts as being within one of four "tiers" (or impact levels) described in the study. Areas with the greatest level of air tour noise disturbance are characterized as Tier 4 involving a large spatial area, long time or duration of noise intrusion, and high level of audibility ( $\geq$  35 dB); areas with low disturbance are Tier 1 involving a small spatial area, short time, and low level; and areas with no air tour noise would be Tier 0. Note: Presumably, alternative 2 in the EA would be properly characterized as having Tier 1 (i.e., not Tier 0) level of impacts, since the "no air tours" alternative would still allow air tours to fly at 5,000 feet AGL or higher over the park and would inevitably result in some detectable air tour noise.

In any case, depending upon the current level of impacts (i.e., tier) for wilderness areas at HAVO, to be determined by NPS based on the framework, we suggest an appropriate goal would be to impose operating restrictions at HAVO sufficient to reduce the impacts to wilderness by 1-2 tiers. For example, if current impacts are characterized as Tier 4, the goal should be to reduce them to Tier 2. If current level of impact is Tier 2 or Tier 3, then the goal should be to reduce them to Tier 1.

Note: McKenna et al was prepared with active involvement by NPS Natural Sounds Program staff, so we see no need to further explain the "framework" here.

9. Last but not least, 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, FONSIs, and draft and final EISs (1505.2(b); 46.450)."

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 moving forward with the ATMP planning process at HAVO, 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 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 Coalition to Protect America's National Parks Email: editor@protectnps.org 2 Massachusetts Ave NE Unit 77436 Washington, DC 20013

cc: Cindy Orlando, Acting Regional Director, Regions 9, 10 and 12, 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, National Park Service

Correspondence ID:	754	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,28 2022 12:02:46		
Correspondence Type:	Web F	orm	

Correspondence: We need to start charging the helicopter companies entrance fees just like everyone else has to pay! They are making huge profits while our poor National Park struggles with funding. Start charging the heli companies to see the volcano just like everyone else! MAHALO

Correspondence ID:	755	Project: 103522 Document:	118739
Name:	BRANI	DT, DEAN	
Received:	Mar,28	2022 14:58:55	
Correspondence Type:	Web Fo	orm	

Correspondence: I do not support this ATMP for Hawaii National Parks. This idea will cause unsafe conditions for pilots and their passengers. Please take this comment as a vote NO.

Correspondence ID:	756	Project: 103522 Document:	118739
Name:	,		

Received:

Mar,28 2022 15:07:06

#### Correspondence Type:

Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	757 Project: 103522 Document: 118739
Name:	Dean, Joseph
Received:	Mar,28 2022 15:16:25
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	758 Project: 103522 Document: 118739
Name:	Schoeneck, James
Received:	Mar,28 2022 15:52:02
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP restrictions proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly

regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

• Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.
Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	759	Project: 103522 Document:	118739
Name:	Gonda, Jeremy		
Received:	Mar,28	8 2022 16:04:59	
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	760 Project: 103522 Document: 118739
Name:	Cohn, Domino
Received:	Mar,28 2022 17:27:02
Correspondence Type:	Web Form

Correspondence: I work for K&S Helicopters in Hawaii. As a person who works in and loves general aviation, I am greatly concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). I worry that implementing the proposed plans will negatively affect our business and in turn, have a real and lasting affect on my ability to provide for my family, and impact my fellow 80+ colleagues.

Some of my fondest memories are of flights over Kilauea. The immense scope of our volcano's majesty and power can only be truly appreciated by air. It is not fair to my children and future grandchildren to prohibit this harmless use of public space in the future, or to restrict it so much that only the rich can afford to see it from this vantage. Air tours extremely eco-friendly. They require no invasive infrastructure in the Park; they do not allow for guests

venturing off of designated paths to damage our fragile ecosystem; and they leave no trace. Quite the contrary, air tours help to alleviate congestion in the Park, making it more enjoyable from the ground and opening access to people with disabilities who otherwise might not be able to see it at all.

Lastly, as a holder of a pilot certificate, I am aware these proposed ATMP's have the potential to create hazardous circumstances for my fellow aviators and for myself. Changing weather patterns and eruption sites already make Kilauea a dynamic place to fly; adding stringent altitude requirements and tight corridors only increases the workload on pilots.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. It is my earnest belief that the ATMP will negatively affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	761         Project: 103522         Document:         118739
Name:	Salem, Sara
Received:	Mar,28 2022 17:32:04
Correspondence Type:	Web Form

Correspondence: My husband and I took a Paradise Helicoptors tour over the Big Island years ago and it was our only time seeing active lava and one of the main reasons we wanted to visit. It was magical. It was also safer than trying to see an active volcano in other ways. So naturally I am concerned about proposed restrictions to helicopter tours of the remote, otherwise inaccessible and UNIQUE geological features of Hawaii and the National Parks in particular. Please do not settle for a one size fits all policy.

I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Air tours are a safe way to experience the park. However, forcing pilots to fly on fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need the flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	762 Project: 103522 Document: 118739
Name:	Gunderson, Laurel
Received:	Mar,28 2022 17:41:44
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Please do not restrict me or other tourists from fully enjoying Hawaii!

Thank you.

Correspondence ID:	763 Project: 103522 Document: 118739
Name:	Blakemore, Bennett
Received:	Mar,28 2022 17:48:47
Correspondence Type:	Web Form

Correspondence: With regard to instructions for public comments having to contain: "substantive comments" with "reasonable alternatives" I have serious concerns about the criteria of opinions that are to be considered "Reasonable and substantive". To a nature lover or cultural practitioner it is "reasonable" to be able to listen to the birds of the forest without the higher noise signature / pollution of a helicopter circling overhead? (as my family experiences on a daily basis in the park). The constant daily noise of air traffic going back and forth to the caldera along the 12 miles of Mauna Loa Strip road can only be free of noise one day a week in Alternative 3 on Sundays!!! How are these "alternatives" alternatives when none of them seem to contain the specific metrics of sound quality nor any targeted reduction of specific "noise signatures" associated with noise pollution of helicopters mentioned in the article below.

According to a recent article on helicopter noise in Vertical, a helicopter industry magazine:

"One interesting aspect of the noise issue is that helicopter sounds seem to be particularly annoying to many people, even though they may not actually be as loud as other sounds they are exposed to. Numerous studies have shown that people perceive helicopter noise as being much louder than it really is -- almost twice as loud.... According to Caillet, "a reason for annoyance probably lies in the specific noise signature of the helicopter," rather than the decibel level of the noise itself."

https://verticalmag.com/features/the-science-behind-helicopter-noise-how-the-industry-is-working-to-reduce-it/

To read my comments and fully understand what stakeholders are experiencing, I strongly recommend listening to the following audio track while you review the comments. You may then better understand why stakeholders feel so strongly about these issues when trying to enjoy the quiet of the outdoors at HVNP despite regular interruptions due to noise by aircraft. Try reading my comment below with the audio track on and then read it with audio track off ....The reader may get a better understanding of the key points being made.

## https://www.youtube.com/watch?v=2RtDgTm6rn4

So my substantive and reasonable comment is that regular and independent sound quality monitoring should be part of the alternative plan accountability process, preferably by an independent agency. Specific sound profiles and sound pollution targets be enforced with regard to air traffic in the National Park. Alternative plans must have requirements to monitor and reduce noise signatures associated with aircraft in the National Park. A plan should have specific targets to reduce aircraft noise profiles over a "reasonable" amount of time and the power to ENFORCE it.

For example: Partnership with the University of Hawaii to independently monitor the sound quality and report them to NPS. An alternative plan should include targeted, incremental stepped down noise levels to the point that a hiker can hear the sound of birds over the "sound profiles" of a helicopter. At the very least DEFINE a reasonable level that is specifically monitored at regular intervals. These are "substantive" elements a stakeholder would expect to see with regard to any alternative plan. So the question is: Is this "reasonable"?

Is this unreasonable? Considering these sound profiles / levels are critical factors in "visitor experience", "wilderness character" and natural resources. Stakeholders can hardly enjoy their National Park experience when noise pollution, caused by aircraft, constantly interrupts the experience. These are some of the key elements at the heart of the "visitor experience", "wilderness character" and natural resources free of sound pollution, not to mention the negative cost to animal well being. That is why a sound quality criteria must be included in any alternative plans.

Finally, as QT technologies increase so should noise signature / pollution requirements be adjusted to reflect better sound signatures into all alternative plans going forward. The alternatives presented do not seem to have specific noise pollution or noise signature targets nor the power to regulate non compliant parties.

Giving only limited alternatives, foot dragging or waiting for legal action by stakeholders will not solve these issues. Not having rigorous provisions for sound quality in these plans quite frankly lacks substantive depth and is unconscionable.... Adopting any of these plans without addressing sound quality will only have the appearance of rubber stamping a plan without addressing this key concern.

Correspondence ID:	764	Project: 103522 Document:	118739
Name:	Demeter, John		
Received:	Mar,28	8 2022 17:55:34	
Correspondence Type:	Web F	orm	
Correspondences. No. No. No. No. holicopter tours!!!!!!			

Correspondence: No. No. No. No helicopter tours!!!!!!

Correspondence ID:	765	Project: 103522 Document:	118739
Name:	johnson, dorian		
Received:	Mar,28 2022 18:50:56		
Correspondence Type:	Web F	orm	

Correspondence: Please end helicopter tours altogether over national parks, including hawaii volcanoes. they detract from the natural serenity and beauty for the vast majority of owners and visitors of the park

Correspondence ID:	766	Project: 103522 Document:	118739	
Name:	,			
Received:	Mar,28 2022 19:24:12			
Correspondence Type:	Web F	form		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

Correspondence ID:	767	Project: 103522 Document:	118739
Name:	Gray, William H		
Received:	Mar,2	8 2022 22:30:26	
Correspondence Type:	Web I	form	

Correspondence: Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly and increases the environmental footprint of those who do visit. My wife and I are both 70+ and have been fortunate enough to take two helicopter rides over Hawaii Volcanoes National Park and we thoroughly enjoyed each one. Please do not implement overly restrictive regulations on this activity.

Correspondence ID:	768	Project: 103522 Document:	118739	
Name:	ernst, bob			
Received:	Mar,28	8 2022 22:53:20		
Correspondence Type:	Web F	orm		

Correspondence: COMMENTS FROM HICOP FOR HAWAII VOLCANOES AND HALEAKALA ATMP SCOPING 2022

HICoP concurs with and supports the excellent comments of Representative Case.

"Throughout our Hawai'i, excessive unregulated commercial helicopter/small aircraft tour operations have heightened safety concerns in the air and on the ground and severely disrupted our communities and special places," said Case.

HICoP knows this first hand as since 2015 HICoP has been involved in many community meetings, FAA/HDOT Airports Division standing room only public hearings and including meetings with Superintendent Orlando and Park staff.

HICoP Board members have first hand experienced the tour copter negative impacts to the Park and have received many complaints by others.

At hicop.org the change.org link has over 700 irate members of the public describing the torture of tour copter noise, much of it at Hawaii Volcanoes. At a Friends meeting at the Park Orlando was giving her report and was drowned out by a passing tour copter.

HICOP board members participated in the 2011 ATMP hearing at the Park which is/was very similar to the current scoping and where most comments supported the then option 2 similar if not the same to the current option 2. And here we are 11 years later doing the same thing while the Park and visitors endure the tour copter continuing noise torture.

This tour copter noise is totally unnecessary since an ATMP for the Park may eliminate all tour copter operations and therefore the accompanying noise that is so disruptive to what visitors to the Park expect, not to mention impacts to supposedly protected wildlife and wilderness.

That is why HICoP joins with Representative Case and implores the Agencies to implement Option 2, "NO FLY'

It is unconscionable that for over 22 years the 2 Agencies totally failed to implement 1 ATMP and further uncounciousable that Hawaii Volcanoes, the most tour copter impacted National Park in the Nation and Haleakala the 4th have been further delayed, the atrocity continues, shameful!

"This has been especially true in our two treasured national parks, Hawai'i Volcanoes and Haleakalā, with pre-COVID overflights of 16,500 per year for Hawai'i Volcanoes and 5,000 per year for Haleakalā, some of the very highest in the entire National Park System. "These flights disrupt communities on the way to and from the parks, destroy the serenity of these natural treasures, have significant impacts on the natural environment and soundscape, inhibit perpetuation of cultural connections to our landscapes, impede the preservation of endemic Hawaiian ecosystems and diminish visitors' abilities to learn about and enjoy the parks' resources."

"I will be submitting comments urging maximum protection for both of our parks," said Case.

"I will be saying basically that no company or person has the right to destroy our national parks for any reason, including tourism, that we have many other opportunities for different people of different abilities to enjoy our national parks, and that air tours are fundamentally inconsistent with the reasons for which we established our national parks to start with."

Press Releases

Congressman Case Urges Public Comment Supporting Ban On Commercial Tour Helicopter/Small Aircraft Overflights Of Hawaii's Two National Parks

Ban Is One Alternative Under Consideration By National Park Service And Federal Aviation Administration In Development Of Air Tour Management Plans For Precious But Disrupted Hawai'i Volcanoes And Haleakala National Parks

(Honolulu, HI) - Congressman Ed Case (HI-01), a member of the U.S. House Committee on Natural Resources and Subcommittee on National Parks, Forests, and Public Lands which has jurisdiction over the country's 63 National Parks, today urged the public to submit comments to call for the protection of Hawai'i Volcanoes National Park and Haleakalā National Park.

"Throughout our Hawai'i, excessive unregulated commercial helicopter/small aircraft tour operations have heightened safety concerns in the air and on the ground and severely disrupted our communities and special places," said Case.

"This has been especially true in our two treasured national parks, Hawai'i Volcanoes and Haleakalā, with pre-COVID overflights of 16,500 per year for Hawai'i Volcanoes and 5,000 per year for Haleakalā, some of the very highest in the entire National Park System.

"These flights disrupt communities on the way to and from the parks, destroy the serenity of these natural treasures, have significant impacts on the natural environment and soundscape, inhibit perpetuation of cultural connections to our landscapes, impede the preservation of endemic Hawaiian ecosystems and diminish visitors' abilities to learn about and enjoy the parks' resources."

Case continued: "In 2000, Congress passed the National Parks Air Tour Management Act to require the National Park Service (NPS) and Federal Aviation Administration (FAA) to work together to set up specific air tour management plans (ATMP) for each national park, but the agencies, especially the FAA, dragged their feet for over a decade.

It took a lawsuit from a Hawai'i community group for the federal courts to order FAA and NPS to implement either ATMPs or voluntary agreements for the most heavily-impacted parks including Hawaii's.

"The NPS is now proceeding with development of ATMPs for Hawai'i Volcanoes and Haleakalā and is requesting public comment on alternatives:

(1) no action/status quo/historic levels;

(2) maximum protection/no air tours under 5,000 feet above ground within a half mile of the parks;

(3) specific routes through the parks with caps on total flight per day and annually; and

(4) (for Hawai'i Volcanoes) more limited routes with caps. The Honolulu Civil Beat article here summarizes the process."

"I will be submitting comments urging maximum protection for both of our parks," said Case.

"I will be saying basically that no company or person has the right to destroy our national parks for any reason, including tourism, that we have many other opportunities for different people of different abilities to enjoy our national parks, and that air tours are fundamentally inconsistent with the reasons for which we established our national parks to start with."

"We need your help with your own comments in your own words and from your own experiences," said Case. The deadline for submission is April 1st.

The NPS is asking for "substantive comments," meaning more than just that you support an alternative, but why and why the other alternatives won't work.

To review the ATMP proposals and comment: here for Hawai'i Volcanoes National Park and here for Haleakalā National Park.

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Correspondence ID:	769	Project: 103522 Document:	118739
Name:	, William		
Received:	Mar,29 2022 02:24:22		
Correspondence Type:	Web Form		

Correspondence: I have been on top of Mauna Ulu when a Blue Hawaiian helicopter flew over at less then 200 feet above me. I felt the wash of the blades. I felt it was extremely reckless and irresponsible of the pilot. Besides the unbelievable noise and threat to the native birds, I felt that if he had come any closer I would have been blown into the crater. No controls over these operators have ruined the HVNP experience for thousands of people. 3000 feet above ground level is not unreasonable. Limiting access to certain hours of the day AND severely limiting the number of flights per day over the park should be considered.

Correspondence ID:	770	Project: 103522 Document:	118739
Name:	, Bill		
Received:	Mar,2	9 2022 02:42:35	

Correspondence Type:

### Web Form

Correspondence: We live on one of the main helicopter routes to HVNP. When a cruise ship is in town we suffer up to 50 flights per day directly over our house. The COVID pandemic has reduced flights to a few per week. The Pueo and Io have returned to the forest! We currently watch 2 separate Io families and an unknown number of Pueo families from our property. These had disappeared when the helicopters were flying at 500 feet or lower.

Correspondence ID:	771 Project: 103522 Document: 118739
Name:	, Julie
Received:	Mar,29 2022 02:50:40
Correspondence Type:	Web Form

Correspondence: Please save the native birds from this constant racket. Helicopter flights should be banned during the spring nesting season for endangered native birds. During the last two years of relative quiet I have noticed an increase in the number of raptors and Nene in lower Puna bordering the Park.

Correspondence ID:	772 Project: 103522 Document: 118739		
Name:	, Ellen		
Received:	Mar,29 2022 02:58:40		
Correspondence Type:	Web Form		

Correspondence: The Park Superintendent has refused to limit helicopter flights over the park. This allowed the helicopter companies free reign to the detriment of the endangered birds and a peaceful park experience. Keep the helicopters completely offshore!

Correspondence ID:	773	Project: 103522 Document:	118739
Name:	N, Mark		
Received:	Mar,29 2022 03:03:38		
Correspondence Type:	Web Form		

Correspondence: Thank You for providing this opportunity to express my concerns about commercial air tours at Hawaii Volcanoes National Park.

The park was blessedly quiet these past 2 years of covid-19, but that peace is now erased by the seemingly constant presence of air tours, primarily helicopters. They seem to be flying everywhere, always, and much too low,

rendering the Park unenjoyable for those of us on the ground. This is unacceptable.

ATMP Potential Alternative 1 is unacceptable for the same reasons.

Alternative 2 would certainly restore peace to the Park, but air tours are going to happen anyway, so reasonable regulation (and enforcement!) are needed.

I would like to see a fair compromise, a hybrid of ATMP Potential Alternatives 3 and 4, both of which have some very insightful positives:

Initiate a cap on daily flights as is "considered" in Alternative 4.

Keep the Routes of Alternative 3, but make the SW Rift Zone a regular route (vice "Adaptive

Management"), and add a Kahuku route as in Alternative 4.

Set minimum altitudes at 2000 feet AGL on all routes.

Times per Alternative 4, Days per Alternative 3 (both with QT incentives).

No Loitering/Circling, per Alternative 3.

Interpretive Training mandatory, per Alternative 3.

Event Restrictions 3 miles standoff per Alternative 4.

Thank You!

Name:	Pfuetzner, Annegret
Received:	Mar,29 2022 06:04:11
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. Pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	775 Project: 103522 Document: 118739	
Name:	Margel, Bernadette	
Received:	Mar,29 2022 07:48:41	
Correspondence Type:	Web Form	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Correspondence ID:	776	Project: 103522 Document:	118739
Name:	Doner, Nicole		
Received:	Mar,29 2022 08:39:37		
Correspondence Type:	Web F	form	

Correspondence: To Whom it May Concern

You can't go outside any morning of the week without copter noise from approx 7:30am until afternoon. What is the sense in a federal taxpayer funded park and Kipuka Puaulu Bird Trail if you can't enjoy without copter noise for a single day. Each copter creates about 12 minutes of noise from approach, circles over caldera, and departure. This happens continuously. I own a rental in Volcano community and the significant number of flights and substantial noise are detrimental to not only Volcanoes National Park but to the community in general. Thank you

N Doner

Correspondence ID:	777	Project: 103522 Document:	118739
Name:	, Tim		
Received:	Mar,29	2022 09:10:39	

### Correspondence Type:

#### Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	778 Project: 103522 Document: 118739		
Name:	Price, JACQUELINE A		
Received:	Mar,29 2022 10:32:12		
Correspondence Type:	Web Form		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated

Correspondence ID:	779 Project: 103522 Document: 118739			
Name:	Hannan, David			
Received:	Mar,29 2022 10:48:40			
Correspondence Type:	Web Form			

Correspondence: Hawaii Volcanoes National Park

I would be concerned re any increase in the number of helicopters doing tourist flights over the park at any one time.

We did enjoy our trip but were concerned for our safety, when we momentarily were flying thro cloud, especially as there were other helicopters in the area.

Correspondence ID:	780	Project: 103522 Document:	118739
Name:	Piland, Patricia P		
Received:	Mar,29	9 2022 10:53:21	
Correspondence Type:	Web F	orm	

Correspondence: To Whom It May Concern:

I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Several years ago during an eruption I was able to see and share with my science students in NC great views of the fissure 8 due to the availability of air tours and boat tours. There was no other way to safely see the volcano. I am older and am afraid of heights, but felt safe and secure due to the skills of our pilot, who had been in the military. If I had not had this service available, I would have had to hike in which would have been riskier. Please allow this great service to remain available and trust in the skills of these pilots.

Thank you, Patricia Poplin Piland Retired Science Educator

Correspondence ID:	781	Project: 103522 Document:	118739
Name:	Koentopp, Kip		
Received:	Mar,29 2022 11:00:51		
Correspondence Type:	Web F	form	

Correspondence: To the National Park Service:

I would like you to know that my visit with Paradise Helicopters was the most fascinating flight over the Big Island and the volcano. I enjoyed it thoroughly. I'll never forget it. I had a wonderful pilot and we saw a lot. I would do it again and hope to on my next visit.

I thank everyone at Paradise.

Correspondence ID:	782	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,29	2022 11:36:11	

#### Correspondence Type:

#### Web Form

Correspondence: I took a trip with Paradise Helicopters to view the lava flow from the Volcano. I was with a friend who had flown in from Sydney, Australia. It was the highlight of our trip. We felt safe and well cared for - we are both in our 70s - and it would truly be a huge loss if they were to stop operating. I endorse the following comments

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Correspondence ID:	783 Project: 103522 Document: 118739		
Name:	Groff, Paige R		
Received:	Mar,29 2022 11:48:49		
Correspondence Type:	Web Form		

#### Correspondence: Aloha,

Hawaii air tours in my opinion are some of the best ways for visitors and locals to see and learn about the history and beauty of the Hawaiian Islands. The Big Island being so diverse, it makes it one of the most attracted places to see from the air. As a pilot myself, I truly believe that sharing the volcano and the history of the volcano with guest is like no other. I am born and raised from Kailua Kona, and my passion is to share my knowledge with guest, as well as sharing the sheer beauty of the Hawaii Island, which includes the volcanos national park. Air tours allow us to share the volcanos national park to those who may not have easy access into the park ie. Handicapped or elderly. Being able to provide air tours for guest also allows us to leave little to no carbon foot print within the national park. Hawaii air tours continues to strive for excellence in safety, both for the aviation community and the public.

Correspondence ID:	784	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,29 2022 12:07:25		
Correspondence Type:	Web F	orm	

Correspondence: Thank you for the opportunity to comment on the ATMPs for Hawai'i Volcanoes and Haleakalā national parks. I strongly support Alternative 2, which would prohibit air tours over certain areas, as a first step.

It is simply not true that "much of the beauty of our national parks may only be experienced from the sky" or is otherwise inaccessible except to hardy hikers, as stated by an air tour executive quoted in the Honolulu Star-Advertiser ("Air tours -- Delay expected for national park plans," March 14, 2022).

Air tours offer only distant, fleeting views. They show nothing of what makes up that beauty, while disturbing it, and everything else in their flight paths.

Virtual tours could offer parkgoers a richer experience. The film "Hidden Hawai'i," shown daily in Waikiki years ago, was one example. From the safety of an inexpensive Imax theater seat, people could see Hawai'i's beauty in spectacular, up-close detail. The prevailing noises were natural ones and the voice of the narrator.

See for yourselves examples of the wonders that could be included and explained in such films, in keeping with the mission of our parks:

dlnr.hawaii.gov/ecosystems/nars/donate

Sure, a helicopter ride can be thrilling. But why are we sacrificing what would be quiet skies over parks and homes to support a thrill-ride industry?

Offshore flights could well satisfy the market for air tours. And during live volcano eruptions, the U.S. Geological Survey website offers the best visuals at no cost.

Correspondence ID:	785 Project: 103522 Document: 118739
Name:	Jelly, Tracey
Received:	Mar,29 2022 12:08:57
Correspondence Type:	Web Form

Correspondence: Some of the best views can only be obtained from from a helicopter tour. These tours also make the park assessable to handicapped people. Please do not limit the park to handicapped people.

Correspondence ID:	6 Project: 103522	Document:	118739
Name:	Mohan, Krishna		
Received:	Mar,29 2022 12:56:54		
Correspondence Type:	eb Form		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	787 Project: 103522 Document: 118739		
Name:	Oropeza, Anselmo G		
Received:	Mar,29 2022 13:08:20		
Correspondence Type:	Web Form		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	788         Project: 103522         Document:         118739
Name:	Traylor, Dean
Received:	Mar,29 2022 13:12:03
Correspondence Type:	Web Form

Correspondence: The helicopter noise from volcano air tours is untenable long term. It is daily, low altitude, loud, and disruptive. My right to quietly enjoy my property is frequently disturbed. On the other hand the economic importance of the helicopter tours is something to consider. Perhaps limiting hours, providing compensation for those in the flight path, or requiring approach and departure from the ocean may be some solutions.

Correspondence ID:	789 Project: 103522 Document: 118739
Name:	Morrow, Jeremy and Mary
Received:	Mar,29 2022 13:15:22
Correspondence Type:	Web Form

Correspondence: Dear Superintendent:

My wife and I are writing to comment on the Air Tour Management Plan primarily to object to the terrible idea of establishing an air route along Highway 11, presented in Alternative 3.

We have been visiting Hawaii Volcanoes National Park (HAVO) since 1987. I am a retired USAF member with 35 years of combined active duty, reserves, and USAF civilian service. As a school teacher and later Assistant Principal, Mary led decades of annual school trips to the park, all staying at KMC, meeting with rangers for educational hikes and invasive ginger remediation projects. Of note, we are also long-time members of the Friends of Hawaii Volcanoes National Park, given our love of HAVO and support for folks like you who care deeply for the park's future.

Our comments are:

1. The current level of air tours over the park is disgusting and at variance with the whole idea of establishing and maintaining a park for everyone's enjoyment. The experience of being in HAVO is severely negatively affected by the near constant noise from clattering helicopters overhead. One enters any national park in the hopes of enjoying beautiful scenery, learning about and appreciating the land and natural habitat for unique species, and finding peace and serenity in the midst of our busy lives. These and other goals are very negatively impacted by these helicopter overflights of the very areas visitors are trying to enjoy. They are distracting, annoying, and all too frequent. The description of this impact is well and accurately described in the Feb 2022 Newsletter on the HAVO ATMP, pages 7-8. For these reasons Alternative 1 should be considered dead on arrival and untenable in every way.

2. Alternative 2 would be absolutely wonderful! It would restore peace and serenity in large measure to HAVO. What a different experience the million plus visitors a year to HAVO would have! These million plus peoples' interests should and do outweigh the up to six people in a helicopter, or the employment that activity provides to the helicopter companies. You could easily hear the birds, the wind, and even the creaking of the beautiful trees without the incessant helicopter noises overhead. We support Alternative 2 enthusiastically!

3. Alternative 3 is a completely awful and bad idea, primarily due to the inclusion of the Northern Route along, over, and around Route 11. The Northern Route would have helicopters flying in a swath near Route 11 (not necessarily directly above Route 11 per the map) during six days of every single week (if QT aircraft are included).

I should note, too, that QT does not mean no noise, it just means less noise, but residents directly underneath and nearby would definitely say still very disruptive and annoying.

The purple arrows on the map indicate the Northern Route would allow helicopters directly over and directly adjacent to large areas of the summit, Volcano Village, and the Volcano Golf Course residential area. This would constantly negatively impact the thousands of HAVO visitors in the summit/Visitors Center/Volcano House/summit trail areas, and residents of the surrounding areas. The larger map is drawn to indicate that upwards of 90% of the Golf Course residential development would be constantly overflown, along with perhaps 50% of the Volcano Village area. Though the map inset indicates a somewhat narrower swath, the negative impact of frequent helicopters flying anywhere along this route would be significant and awful for anyone visiting the park or living in these areas. It would be terribly ironic if rangers giving talks at the Visitors Center had to interrupt their talks about the beauty/serenity of the park each time a clattering/noisy helicopter using the Northern Route flew overhead the presentation.

We are currently building our retirement home in the Golf Course residential development, and have been looking forward to enjoying the amazing peace and quiet one experiences in that development when there are no helicopters. Helicopters currently overflying Volcano are now relatively infrequent, but Alternative 3's Northern Route would dramatically increase that number and very negatively affect our lives and thousands of others in the areas along Route 11.

4. Though some might view Alternative 4 as having less impact on the overall park, we are concerned that concentrating helicopter flights in primarily two areas (coastal and Pu'u O'o, with likely less frequency at Kahuku) will forever destroy the peace and serenity of those areas. For example, if one visits the coastal area now, whether by road or trail, it is an amazingly desolate but beautiful, serene, and peaceful area and experience. We always recommend visitors take the long drive down Chain of Craters Road to have that wonderful experience. However, the constant din of clattering helicopters would eliminate much of that enjoyment and experience if the coastal route is allowed.

Sincerely,

Jeremy Morrow Mary Essig-Morrow

Correspondence ID:	790	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,29 2022 15:09:17		
Correspondence Type:	Web F	orm	

Correspondence: I agree with all the comments already posted.

The helicopter trip excursion on our vacation to Hawaii was one of the highlights of our trip. What made it most most enjoyable was that it did not have any restrictions in its route or air travel. We felt very safe with our very professional pilot who took great care in giving us a wonderful experience.

Correspondence ID:	791	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,29 2022 15:12:01		
Correspondence Type:	Web F	form	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that

requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

Air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	792	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,29 2022 16:07:24		
Correspondence Type:	Web F	orm	

Correspondence: Mahalo for the opportunity to provide comments on these proposals and for your hard work thus far creating the well thought out alternatives. I believe the most important elements of the alternatives are the annual/daily number of flights, routes, restriction for particular events, and times of day. Based on these considerations alternative 2 appears to be the best option for the majority of stakeholders to resolve a number of issues with the flights and their impacts on cultural practices and celebrations, surrounding communities, visitor experiences, and environmental impacts especially on native plants and animals.

The annual and daily number of flights is the crux of the issue with the current situation impacting cultural ceremonies and practices at sacred sites, visitor experience, the wilderness character of the area, and impacts on native species such as birds in the area. These current level of flights also impacts surrounding communities and has impacted mental health of residents of the surrounding area as well as educational experiences in local schools near the park. Based on the information presented and the alternatives, it seems as though alternative one is an untenable option for multiple reason. Alternative 2 appears to be the most desirable for the majority of stakeholders that would be impacted including ecological considerations.

The flight routes are also an important consideration as they designate the specific areas that will be disrupted. Upon reviewing the map, alternative 1 would have the greatest negative impact with the current flight patterns. Again, alternative 2 appears to be the best solution to this area of concern for the majority of stakeholders. The flight paths presented in alternative 4 would minimize most of the impacts with the exception of ecological impacts on coastal and marine life so this may be a good 'middle ground' option pending results of an environmental assessment.

I appreciate the consideration for cultural practices and ceremonies, but have concerns regarding the implementation of this. Given that this is a federal park who will determine what qualifies as a 'particular event' where flights would be restricted? Having a clear policy or guidance on what would qualify as an event would be helpful. In addition, outlining the specific steps needed to apply for such an even would also be helpful. It seems like this may be a difficult issue to navigate given civil rights laws that may need to be navigated. The two month time frame requirement also seems problematic as cultural practices and ceremonies may occur more

spontaneously than this. In this area, alternative 1 does not address these concerns at all. Alternative 2 is the best solution in this area. Alternatives 3 and 4 attempt to address these areas, but the two month time frame for advance notice is problematic and clear guidance is needed on what qualifies and how to apply for this.

The times of day listed are also an important consideration for surrounding communities as well as visitors to the park. Again, alternative 2 is the best option in this area for the majority of stakeholders. Alternative 1 does not address this concern at all so it should not be considered. The 10 am to 2 pm alternative for non QT flights in alternative 3 is also a solid proposal.

Based on all these considerations alternative 2 is clearly the best option for the majority of stakeholders. Alternative 4 is a potential middle ground solution, but this option could be revised further to address considerations more thoroughly. Alternative 1 is a very poor solution and should not be considered.

I would recommend moving forward with the proposal for alternative 2. I would also recommend considering a blend of alternative 3 and 4 with the flight paths from option 4, but with the mandatory interpretive training and education as well as Quiet Technology Incentives of only allowing QT flights on Wednesdays. Please also consider blending the more limited time of day restrictions from alternative 3 with the more limited routes in alternative 4.

In addition, I have noticed multiple incidents of helicopters flying below the designated altitude in both the Mauna Loa Road area and the Mauna Ulu area. This has been difficult to report due to the quick movement of the helicopters and challenges reading their identifying codes, but it is a frequent issue. Having an app or clear directions on how to report these violations would be helpful to help manage the current air traffic in the park. Thank you for considering this input.

Correspondence ID:	793 Project: 103522 Document: 118739
Name:	Runnells, Mindy
Received:	Mar,29 2022 16:29:59
Correspondence Type:	Web Form

Correspondence: I agree that tours being restricted to certain days and reducing the number of flights would benefit the peace and tranquility of the park, her sacred places and sensitive habitats. Not flying on sacred days and holidays would also be respectful.

I also agree with raising the minimum altitude. I just hate hearing them fly so low.

Thank you for your time. . Mindy Runnells

Correspondence ID:	794 Project: 103522 Document: 118739
Name:	Lee, Gigi
Received:	Mar,29 2022 16:47:33
Correspondence Type:	Web Form

Correspondence: As a longtime local resident, the noise is relentless. It starts in the morning and just continues all day. And it's not like a fly over, it approaches then just hovers and circles for quite some time before slowly departing. Then not much later starts up again.

This is NOT an urban area and we are nowhere near an airport so this kind of daily interruption is very upsetting. Had we chosen to live somewhere that was normally inundated with street noise and city noise that would be acceptable. But we residents have to work extra hard to live up here. Nothing comes easy for us. But the reason we go to all the extra toil and effort and expense? Peace and quiet. These private commercial companies should not be allowed to continually profit at our expense. It's just too much.

If you purchase property near a school, or an airport or a busy intersection than you can expect this kind of constant noise. But we purchased our homes in a tropical rain forest next to a national park. We did not sign up for this.

One or two flights a day would be acceptable but this is just a constant barrage. If you lived here you would understand the level of disruption.

Please consider the residents that work so hard to live in this area. We are almost always underrepresented.

Correspondence ID:	795         Project: 103522         Document:         118739
Name:	Yamaguchi, Kelli
Received:	Mar,29 2022 17:00:14
Correspondence Type:	Web Form

Correspondence: - Air tours over Hawaii Volcanoes National Park (HVNP) should be completely prohibited.

- Air traffic/air tours over my home in Pahoa are daily, loud, and disruptive in an otherwise quiet community. The noise is disruptive to environment, wildlife, and people, and destroys the beauty of nature NPS strives to preserve.

- Air tours should also be prohibited because they are unnecessary-- it is a luxury only available to those who can afford it, and only benefits the businesses who run these air tours. The park is easily accessible and enjoyable via hiking, walking, vehicle, etc.

- Lastly, please make commenting an easier process for the general public. Finding this website and "Open for Comment" link was more involved than necessary, which makes it difficulty for the community to voice their strong opposition to air traffic/air tours over HVNP.

Thank you.

Correspondence ID:	796	Project: 103522 Document:	118739
Name:	Dorn, Kevin		
Received:	Mar,2	9 2022 18:24:41	
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP).

In the document "Hawaii Volcano National Park Feb 2022 Newsletter" Page 7, NPS HVO stated, "Noise from the current level of air tours inhibits the Park's ability to meet this purpose. Noise from air tours negatively impacts existing sacred sites within the Park associated with Native Hawaiian people. The NPS is required to avoid such impacts to sacred sites to the extent possible (NPS Management Policies 2006 5.3.5.3.2). Native Hawaiians have consistently noted that persistent air tours over the Park unreasonably interfere with Native Hawaiian connections to the Park's sacred areas."

Please quantify the negative effects of air tours on sacred sites. What were the decibel readings measured at these sites and what are the thresholds that inhibit the park's ability to meet its purpose and values?

In the document "Hawaii Volcano National Park Feb 2022 Newsletter" Page 7, NPS HVO stated, "A recent Park study documents that loud, frequent helicopter noise results in changes in avian vocalization (Gallardo Cruz et al 2021)."

However, Gallardo Cruz et al 2021 states: "My results suggest that birds at this site may have developed mechanisms to effectively overcome any masking effects of noise on their vocalizations given that helicopter noise has become a regular part of the soundscape at Nāpau Crater"

Developing adaptation mechanisms to deal with noise does not sound like a problem.

I would like the park to generate hard data on the threshold of which they have found that helicopter noise power levels interfere with the purpose and values of the HVO National Park. I would like HVO National Park to consider the same threshold levels of noise that apply to helicopters should also apply to the park's equipment, machinery, tour buses, etc.

In the document "Hawaii Volcano National Park Feb 2022 Newsletter" Page 7, NPS HVO stated, "Current air tours over the Park also directly interfere with resource management activities (such as the execution of acoustic based bird surveys), which impedes the NPS's ability to fully meet the Park's purpose of perpetuating endemic Hawaiian ecosystems and does not support the perpetuation of biological diversity and ecological integrity which are fundamental resources and values of the Park..."

Is it not possible for Hawaii Volcano National Park to work with Hawaii tour providers and the FAA to set aside dates to execute acoustic-based bird surveys?

I would like to see the ATMP go back to the drawing board, I would like to see NPS come up with hard quantitative details concerning the effects of high decibel noise on specific portions of the Park's purpose.

Hawaii Volcano National Park must determine the end state of the ATMP, as defined by dB acoustic impact over time, and the associated thresholds which when crossed inhibit the Park's ability to meet its purpose. The proposed ATMP cap of 11,376 overflights as the average has no basis in the anticipated end state of reducing acoustic power through time that will impact the park.

Mahalo for your consideration,

Kevin Dorn

Correspondence ID:	797 Project: 103522 Document: 118739		
Name:	Hamilton, Jeff		
Received:	Mar,29 2022 21:02:05		
Correspondence Type:	Web Form		

Correspondence: Our residence is in an area that is frequently part of the helicopter tour companies route to and from the volcano area. Very often early in the morning when the air is cooler/denser, one cannot help but to hear the approach to the area. Most often it is on the return flight to Hilo airport that we are bombarded with the noise. Many times it is two helicopters heading towards Hilo at the same time.

My wife and I often walk in the Volcano National Park area on Sundays. Regardless of where we are walking, the never ending sound of the tour helicopters is terrible. Some times we walk to the Halema'uma'u crater overlook and the noise is deafening.

It was so much better during Covid restrictions! Peace and quiet. That has ended and now we are bombarded with the sounds of helicopters going to and from the volcano area daily. There has to be a better flight pattern that would help to minimize the noise.

Correspondence ID:	798	Project: 103522 Document:	118739
Name:	Bendell, Jody		
Received:	Mar,29 2022 21:49:55		
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	799	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,29 2022 23:49:54		
Correspondence Type:	Web F	form	

Correspondence: Seeing the park is one of the most amazing things I have ever done. Then I flew in a helicopter over the craters. It was a thousand times better! I would recommend that everyone have the opportunity to see our beautiful park from the sky without any further restrictions of distance or altitudes from the craters. Helicopters flying means people are seeing amazing views that can't be seen any other way. I dont get upset if a car drives by or if people are talking while I am at the park. It just means people are enjoying the park. If I hear a helicopter fly by it means other people are visiting the park. I everyone to enjoy flights over the park. No other restrictions are needed.

Correspondence ID:	800	Project: 103522 Document:	118739
Name:	Appel, Michael		
Received:	Mar,30 2022 02:52:48		
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	801	Project: 103522 Document:	118739
Name:	Solarsk	i, Robert	
Received:	Mar,30	2022 08:29:28	
Correspondence Type:	Web Fo	orm	

Correspondence: Taking helicopter tours over the volcanos is one of the most exciting parts of our visits to Hawaii. It would be a great loss to future visits as well as tourist who may not have this opportunity.

Correspondence ID:	802 Project: 103522 Document: 118739		
Name:	Kauhane, Valerie		
Received:	Mar,30 2022 10:12:40		
Correspondence Type:	Web Form		

Correspondence: There are already over 70 flights a day. Given the carbon emissions produced and the harmful effects on our ecosystem, this number should be dramatically reduced. It is irresponsible to allow flights to continue given what we know about the effects of carbon emissions on global warming.

Correspondence ID:	803 Project: 103522 Document: 118739
Name:	Bator, Bonnie P
Received:	Mar,30 2022 10:22:22
Correspondence Type:	Web Form

Correspondence: 30 March 2022

Greetings NPS and FAA

## ALOHA!

We appreciate the opportunity to give our mana`o into the formation of the ATMP Environmental Assessment (EA).

Regarding commercial air tour operations:

ALL Commercial air tours operations/operators:

Cease and Desist - over Hawai'i Volcanoes National Park.

We wish to remain on the mailing list for the Air Tour Management Plan Environmental Assessment, please  $\sim$  MAHALO Loa $\sim$ 

The only acceptable means to retain the sanctity of the sacredness of this Wahi Pana:

- is Zero - ABSOLUTELY No commercial air tour operations over the entirety of what is referenced as: Hawai`i Volcanoes National Park.

## MAHALO Loa !!!!!

Sincerely With Our ALOHA

Malama Pono Eō

Correspondence ID:	804 Project: 103522 Document: 118739		
Name:	Hoskins, Julia		
Received:	Mar,30 2022 10:41:22		
Correspondence Type:	Web Form		

Correspondence: Suggested comments:

I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

• Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.
Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	805	Project: 103522 Document:	118739
Name:	Ez, Karen		
Received:	Mar,30 2022 10:43:01		
Correspondence Type:	Web Form		

Correspondence: Helicopter noise has destroyed the serenity of living in Volcano, most specifically in the Golf Course area. Why they insist on flying over or near residential areas is mind boggling. I live part time with my guy in that area. 7:30 am it begins!! Why should lots of people need to put up with the noise for the sake of so few... so another few can put more money in their pockets? They need they fly a different path!!! Let's have some compassion for residents. Pease!!!

Correspondence ID:	806	Project: 103522 Document:	118739	
Name:	Tester, John			
Received:	Mar,30 2022 11:44:57			
Correspondence Type:	Web Form			
Correspondence: PPPPPPPPP				
Correspondence ID:	807	Project: 103522 Document:	118739	
Name:	,			
Received:	Mar,30 2022 12:25:30			
Correspondence Type:	Web Form			

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

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Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	808 Project: 103522 Document: 118739			
Name:	Johnson, Patty G			
Received:	Mar,30 2022 12:32:00			
Correspondence Type:	Web Form			

Correspondence: Stop this racket!!

I tried every day for weeks to make a recording of the birds by the lava tube and could never get more than 6 minutes before a helicopter came through. I had to give up. I mean, not 20 minutes without the noise of a helicopter?

Is this why we have National Parks? The air space I understand is Federal.

Puna folks have been vociferously complaining for years about this noise, to no avail. I don't understand how for the economic gain and enjoyment of a few, the majority must suffer this.

The County needs to curtail this severely and it should be a major issue of concern. Our Park and our homes should be sanctuaries of peace.

Correspondence ID:	809	Project: 103522 Document:	118739
Name:	O'Brien, Lori		
Received:	Mar,30 2022 12:46:07		
Correspondence Type:	Web Form		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

Air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	810	Project: 103522 Document:	118739
Name:	ERNEN	NWEIN, Rick	
Received:	Mar,30	2022 12:46:33	

Correspondence Type:

Web Form

Correspondence: I read through the February 2022 Newsletter outlining Potential Alternatives for Public Comment for the Air Tour Management Plan (ATMP) for Hawaii Volcanoes National Park (HAVO) before reading comments from anyone else, and came up with first impression notes. Then I read comments from the Coalition to Protect America's National Parks (CPANP), of which I am a member. The comments were signed by Michael B. Murphy, dated March 28, 2022, were addressed to Superintendent Rhonda Loh, and were officially submitted to the HAVO ATMP project record. The comments stated the points in my notes and then some, and stated them in terms much better than I probably would have. So I incorporate the CPANP comments by reference in my comments here, as I agree wholeheartedly with them.

I was involved with NPATMA and ATMPs for many years before I retired from NPS several years ago, so I was very happy to see ATMPs finally coming out for public review in 2021. However, when I read through several of them, I am afraid that I was disappointed that they seemed like summaries or outlines of proposed actions without analysis of impacts or alternatives, or even much detail, inadequate in most ways.

However, with HAVO it appears that NPS and FAA are now entering the ATMP process the right way! Thank you! Scoping with the public about Potential Alternatives before proceeding with a true NEPA and NHPA process is what was envisioned when NPATMA was passed (I know because I was involved in that effort). Again, thank you!

In addition to the CPANP comments, again incorporated here by reference, I offer the following additional specific comments on the Potential Alternatives for the ATMP for HAVO:

In the comments below, page numbers refer to pages in the Newsletter.

Purpose and Need (page 3): I would especially emphasize my agreement with the CPANP comments about the Purpose and Need needing to address the NPS Organic Act and objectives and directives from the 2016 HAVO General Management Plan. I also agree there needs to be an appropriate use analysis, impairment determination, identification of a preferred alternative and environmentally preferable alternative as part of the ATMP process, consistent with NPS Management Policies.

Resources for Consideration (page 3): It would seem to me that Aviation Safety might be an additional topic that could differ among alternatives with proximity to ground visitors and volcanic eruptions. The airborne ash and other pollutants from volcanic eruptions, especially when and where lava flows into the ocean creating steam plumes, can obscure pilots' visibility to see and avoid terrain and other aircraft. Airborne ash and other pollutants (e.g., acids) can also get into aircraft engines (at least air filter systems), so alternatives that allow routes close to active lava emitting ash and other pollutants might have more safety concerns than alternatives that keep air tour aircraft further way from such pollutants.

If air tour routes can change under adaptive management in Alternatives 3 and 4 to offer closer views of active lava flows and eruptions, then the ATMP should evaluate procedures to allow and manage such route changes and ensure safety of air and ground visitors, and protection of park resources.

Active lava flows can also attract ground visitors. Many years ago now at HAVO I experienced multiple air tour helicopters present at the same time flying within 50 feet above me and other ground visitors and then into steam plumes where lava was flowing into the ocean, then "riding the elevator" up the plume. I'm sure it was very exciting for many air tour passengers, but the helicopter rotor wash kicked up volcanic ash into the faces and lungs of me and the other ground visitors, and if any aircraft lost power it would have presented a real danger to both air and ground visitors. Hopefully, SFAR 71 stopped such practices. I also note that the routes in Alternatives 3 and 4 are at 1,500 and 2,000 feet AGL minimums which should prevent my past experience from occurring again. But lava flows will always be very attractive to both ground and air tour visitors, so if there are differences in proximity-related air and/or ground safety between alternatives then it should be evaluated for public comment. This is especially relevant if any new alternatives arise out of this scoping process that allow routes at lower AGL altitudes.

NPS aircraft also sometime need to operate near active lava flows, for research, search and rescue, and other official purposes. It would seem prudent for the ATMP to recognize this and indicate procedures in place to ensure safety related to all aircraft within ATMP altitudes over the park.

ATMP Planning Area (page 4): The last sentence of this section indicates that all aircraft operations except commercial air tours would not be regulated by the ATMP. I know there are FAA regulations governing the nonair-tour operations, and I of course defer to FAA on aviation safety. But there is no indication in the Newsletter that there are or would be any provisions to prevent everyone except air tours (especially general aviation and military) from flying wherever they want in the ATMP area across or on air tour routes in any direction without being required to communicate with each other. With the high number of air tours at HAVO, and with changing lava flow locations and activity, surely there are and will be some sort of special safeguards related to the ATMP in place to ensure safety. That should be specified for public consideration in the ATMP alternatives.

Why could there not be something like the Grand Canyon Special Flight Rules Area (SFRA) result from the HAVO ATMP process, with Flight-free Zones and minimum altitudes for different types of aircraft flying over the park? Alternative 3 specifies a "fly zone" and routes, and by implication the rest of the park is flight-free zone. There are definite safety advantages to the air tours as well as the other aircraft operations, and definite impact advantages to park resources and visitors from considering something similar to the Grand Canyon SFRA at HAVO. I know that air tour pilots at Grand Canyon definitely appreciate not having to worry about non-air-tour aircraft on the tour routes, except in rare rogue circumstances. Why can't such a situation be incorporated into at least one of the HAVO alternatives, even if the FAA believes something like new legislation would be needed to implement an actual SFRA? Even though the air tour numbers at HAVO and HALE are lower than Grand Canyon, they are high enough that this seems a reasonable action to consider during this scoping process.

Flight Routes and In-Flight Deviations (page 5): The provisions in this section are excellent! They close a big loophole where some pilots could seek to justify flying tours off approved routes. If the weather on a route is too bad to fly it, they should either turn back or go to another approved route in the shortest, quickest way safely possible (I suggest adding that caveat).

FAA Airspace Authority (page 6): I suggest adding some examples of enforcement actions FAA is prepared to take for violations under the ATMP in accordance with existing FAA procedures and regulations. Make it a commitment to take action, and under what circumstances action would be taken. The public has provided numerous examples of frustration over lack of enforcement for actions clearly outside what is written in plans such as ATMPs as appropriate and/or legal.

Initial Allocation and Competitive Bidding (page 6): I do not have a copy of NPATMA handy, but I do not remember it requiring a competitive bidding process as described in this section. Isn't it discretionary by the agencies rather than required?

Potential Alternatives (page 7): In addition to the other criteria listed that the agencies considered in developing the potential alternatives, this section says "the goals of the agencies" were also considered. Those goals are very important to evaluating the effectiveness of the alternatives and should be clearly listed for public review.

Alternatives Considered and Dismissed (page 7): This is generally a very well-written section! However, there should be a strong link between the rationale in this section and the Purpose and Need, and most of the rationale in this section is not mentioned in the Purpose and Need. It should be.

Also, I am confused because this section does not identify the existing level of air tour operations that it says is unacceptable. Is it the IOA level (26,664) or the actual average reported (11,376) or the range of actual operations reported (8,333 to 16,520)? This distinction is very important to evaluating the alternatives, so it should be specified here.

Alternative 1: I agree with CPANP that the 3-year average of 11,376 seems the most reasonable air tour number for impact analysis for Alternative 1 even though there could be many more operations under IOA. If the IOA number is used for analysis, it would create an unrealistic difference in impacts with the other alternatives, skewing comparisons between alternatives. It should simply be noted in the analysis that up to 26,664 commercial air tour operations could occur under IOA, but since nothing close to that number has ever occurred, a more realistic number is used for the analysis of impacts.

Alternative 2 (page 13): Alternative 2 makes the point that "there would be no limitations on the number of air tours that could occur outside the ATMP planning area." This point is already listed in the section Elements Common to All Alternatives, so it should not be in Alternative 2 in a way that implies that it is different than the other alternatives in this respect. However, it is useful to note that Alternative 2 would not be free of air tour noise

because unlimited air tours could fly outside the ATMP area with noise traveling into the park. Also, there would likely be more tours outside the ATMP area than in the other alternatives because that is the only place tours could fly in Alternative 2. Noise modeling for the impacts analysis should take this into account.

Range of Alternatives: Alternatives 2, 3, and 4 seem to provide a reasonable range of alternatives, but only when considering that (page 15 and 20) "Soundscape modeling for Alternative 3 [4] will consider and evaluate various numbers of annual commercial air tours over the Park, ranging between 1 flight per year to below current condition (the average number of commercial air tours conducted over the Park each year from 2017-2019, in this case 11,376). The number of flights allowed over the Park on an annual basis will be selected to avoid or minimize unacceptable impacts to soundscapes based on Park management zones." Since that number of flights has yet to be determined, it is difficult to compare at this time to the number of operations in Alternative 1. It would seem that more than one number of air tours could be evaluated in Alternatives 3 and 4 to better flesh out the range of alternatives.

Soundscape Impact Analysis: The soundscape impact analysis should address the effects of the alternatives on the number and location of air tour and other flights outside the ATMP area as well as inside. Especially under Alternative 2, there may be many more flights outside the ATMP area since there would be no air tour flights inside the ATMP area, so aircraft noise in the outer parts of the ATMP area would likely increase while it would likely decrease in the inner parts, compared to the other alternatives

Thank you for the opportunity to comment, and good luck! Rick Ernenwein

Correspondence ID:	811	Project: 103522 Document:	118739
Name:	ewing,	eberle	
Received:	Mar,3	0 2022 12:57:24	
Correspondence Type:	Web F	orm	

Correspondence: I have visited Volcano National Park at least 20 times over the past 40 years. The noise pollution from the helicopters, while not at bad as the Napali Coast, is still a major annoyance. It never ceases to amaze me how the interests of a few (stakeholders in the tour companies, their employees, and the few tourists with enough money to spend on a few minutes of airtime) can disrupt the enjoyment of so many.

National parks should be refuges from unnecessary noise. We should be encouraging more people to get out on foot when possible to enjoy nature and the quiet! While I am fortunate to be able to afford a helicopter tour I would never take one on principle.

I am in favor of eliminating the helicopter tours all together, and short of that, curtailing the number of flights.

Correspondence ID:	812	Project: 103522 Document:	118739
Name:	crowle	y, buck	
Received:	Mar,30	) 2022 13:04:12	
Correspondence Type:	Web F	orm	

Correspondence: I favor more restrictions on commercial helicoptor tours. The noise is very bothersome and interferes with the enjoyment of the Park. Why should the pleasure and profits of a few people be given precedence over the many of us who want to experience a natural area without having to listen to fly overs.

Correspondence ID:	813 Project: 103522 Document: 118739
Name:	ewing, janet
Received:	Mar,30 2022 13:24:46
Correspondence Type:	Web Form

Correspondence: Stop helicopters flying over the National Parks!

If that isn't feasible then raise the altitude at which they fly, limit the days they fly, the numbers of flights, etc.

And why is it so hard to find out where and how to comment on this? I notice the helicopter tour companies and very well organized at gaining comments SUPPORTING their disgusting industry.

Correspondence ID:	814 Project: 103522 Document: 118739
Name:	,
Received:	Mar,30 2022 13:47:58
Correspondence Type:	Web Form

Correspondence: Aloha,

Any reduction in the number of tour-helicopter overflights would be very much appreciated. Those of us who live in the peace and quiet of the upland rainforest in the Volcano area understand that visitors, in particular, want to see the eruptive activity at Kīlauea's summit, and aerial viewing can be very exciting. It also supports one segment of the visitor-industry's extended membership (hell-tour companies). However, limits on the number of flights and alternative routes of approach would be helpful.

Attending a native ceremony, recently, here in forest, in a group of Volcano residents, we were silently observing and listening to the Hawaiian chanting of a kumu wahine, performing a blessing of the 'āina, when a hell-tour 'copter flew overhead on its way up to summit area; we could not hear her chant until that noise abated. To repeat: any lessening of these kinds of noisy interruptions to our peace and quiet would be much, much appreciated.

Mahalo ā nui!

Correspondence ID:	815 Project: 103522 Document: 118739
Name:	Donlon, Susan
Received:	Mar,30 2022 14:15:04
Correspondence Type:	Web Form

Correspondence: As a kamaina, and resident, of Hawai'i Island and Hawaiian cultural practitioner, protecting our sacred sites is imperative. I humbly support the National Parks Air Tour Management Act of 2000 restricting commercial aircraft within 1/2 mile outside the boundary of the Park during which the aircraft flies below 5,000 feet above ground level.

Correspondence ID:	816	Project: 103522 Document:	118739
Name:	Pataky	, Rick	
Received:	Mar,30	) 2022 14:30:06	
Correspondence Type:	Web F	orm	

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plans for Hawaii Volcanoes National Park.

I have serious concerns with the development process of the Air Tour Management Plans (ATMP) by the National Park Service (NPS) and the Federal Aviation Administration (FAA). NPS and the FAA have ignored 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. Excluding the NPOAG from providing input on the ATMP process is in direction contradiction of FAA Order No. 1110.138A.

NPS does not have the necessary expertise to fundamentally redesign the airspace over these parks. The ATMPs proposed by NPS would relocate, constrict, and combine flight routes and would make substantial changes to flight altitudes. The current flight routes and altitudes have been in place for years and are well understood by industry. The changes proposed by ATMP have severe aviation safety implications that should have been deliberated in the NPOAG, as Congress intended in the National Parks Air Tour Management Act of 2000.

The proposals currently under consideration will force aircraft into potentially unsafe flight conditions. The NPS has proposed increasing the minimum flight altitude over Hawaii Volcanoes National Park from an allowed minimum 500 feet AGL to 1,500 feet AGL, which does not provide adequate safe options for navigation in typical weather patterns that exist in the park. Even more concerning is that the proposals have fixed narrow flight routes that do not take into account the areas constantly changing weather patterns.

I also have serious concerns with the economic impact these plans will have on helicopter air tour companies. The draft plans' flight allocation numbers do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change and NPS needs to respect that dynamic, as visitors alter their destinations according to those trends.

The NPS has failed to reach out to the operators to enquire what economic impacts might arise implementing a management plan that restricts overflights. Operators are already suffering economically post COVID-19, loosing over 80% of their businesses due to the shutdown of international travel. Further restrictions will cripple an already fragile industry trying to rebuild.

In 2020, Hawaii Volcanoes National Park welcomed 590,000 visitors, a 57% decrease from 2019 when the park welcomed over 1,300,000 visitors. This year many National Parks saw their resources strained by the large number of visitors as the public began to travel again. Air tours are an important option for many visitors conducting a one-in-a-lifetime trip to see famous natural landmarks. Visitors taking advantage of air tours benefit by avoiding traffic, wait times, and walking trails that are inaccessible for the handicapped or elderly, while reducing congestion and demand on park infrastructure.

Like ground-based tours, air tours are a valid part of our visitor experience, providing a unique window from which we can share our cultural, historical and environmental sites with the world. Air tours require no ground-based infrastructure at the park, which allows visitors accessibility without the need for roads, trails, signs, bathrooms, garbage cans, or other services.

By further restricting an already limited number of allowable air tours, we are reducing opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance. Through carbon-offset efforts and strict altitude requirements to control noise just to name a few efforts air-tour operators are working to ensure they are responsi

Correspondence ID:	817	Project: 103522 Document:	118739
Name:	Kadar	usman, Christa	
Received:	Mar,30	0 2022 14:44:34	
Correspondence Type:	Web F	orm	
Correspondence: Hello,			

As a resident, of Hawai'i Island and Hawaiian cultural practitioner, protecting our sacred sites is imperative. I humbly support the National Parks Air Tour Management Act of 2000 restricting commercial aircraft within 1/2 mile outside the boundary of the Park during which the aircraft flies below 5,000 feet above ground level.

Correspondence ID:	818 Project: 103522 Document: 118739
Name:	Witzmann, André
Received:	Mar,30 2022 14:46:49
Correspondence Type:	Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	819	Project: 103522 Document:	118739
Name:	Soares	, Daryl	
Received:	Mar,30	0 2022 14:49:33	
Correspondence Type:	Web F	orm	

Correspondence: I support option 2, the noise generated by your Tour Helicopters over/near my property is so loud that my family is deprived of the peaceful enjoyment of our home. At times flights are so frequent we are forced to leave our property for needed peace and quiet. We ask you to stop the noise nuisance over my property at 18-3825 South Kulani Rd. We conduct business from our farm and your Tour Helicopters are having a negative impact on our business. I'm requesting that thy STOP operating over/near our home which is having a negative impact on my family, these conditions have become unacceptable.

Correspondence ID:	820	Project: 103522 Document:	118739
Name:	Magnu	ıs, Jeffrey	
Received:	Mar,30	0 2022 15:28:29	
Correspondence Type:	Web F	orm	

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plans for Hawaii Volcanoes National Park.

I have serious concerns with the development process of the Air Tour Management Plans (ATMP) by the National Park Service (NPS) and the Federal Aviation Administration (FAA). NPS and the FAA have ignored 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. Excluding the NPOAG from providing input on the ATMP process is in direction contradiction of FAA Order No. 1110.138A.

NPS does not have the necessary expertise to fundamentally redesign the airspace over these parks. The ATMPs proposed by NPS would relocate, constrict, and combine flight routes and would make substantial changes to flight altitudes. The current flight routes and altitudes have been in place for years and are well understood by industry. The changes proposed by ATMP have severe aviation safety implications that should have been deliberated in the NPOAG, as Congress intended in the National Parks Air Tour Management Act of 2000.

The proposals currently under consideration will force aircraft into potentially unsafe flight conditions. The NPS has proposed increasing the minimum flight altitude over Hawaii Volcanoes National Park from an allowed minimum 500 feet AGL to 1,500 feet AGL, which does not provide adequate safe options for navigation in typical weather patterns that exist in the park. Even more concerning is that the proposals have fixed narrow flight routes that do not take into account the areas constantly changing weather patterns.

I also have serious concerns with the economic impact these plans will have on helicopter air tour companies. The draft plans' flight allocation numbers do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change and NPS needs to respect that dynamic, as visitors alter their destinations according to those trends.

The NPS has failed to reach out to the operators to enquire what economic impacts might arise implementing a management plan that restricts overflights. Operators are already suffering economically post COVID-19, loosing over 80% of their businesses due to the shutdown of international travel. Further restrictions will cripple an already fragile industry trying to rebuild.

In 2020, Hawaii Volcanoes National Park welcomed 590,000 visitors, a 57% decrease from 2019 when the park welcomed over 1,300,000 visitors. This year many National Parks saw their resources strained by the large number of visitors as the public began to travel again. Air tours are an important option for many visitors conducting a one-in-a-lifetime trip to see famous natural landmarks. Visitors taking advantage of air tours benefit by avoiding traffic, wait times, and walking trails that are inaccessible for the handicapped or elderly, while reducing congestion and demand on park infrastructure.

Like ground-based tours, air tours are a valid part of our visitor experience, providing a unique window from which we can share our cultural, historical and environmental sites with the world. Air tours require no ground-based infrastructure at the park, which allows visitors accessibility without the need for roads, trails, signs, bathrooms, garbage cans, or other services.

By further restricting an already limited number of allowable air tours, we are reducing opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance. Through carbon-offset efforts and strict altitude requirements to control noise just to name a few efforts air-tour operators are working to ensure they are responsi

Correspondence ID:	821 Project: 103522 Document: 118739
Name:	Connelly, Jack
Received:	Mar,30 2022 15:44:06
Correspondence Type:	Web Form
Correspondence: Aloha,	

Thank you for letting us comment on this plan. I have been a resident of Volcano, HI for a year now. I live across the highway from the park.

Hawaii Volcanoes National Park is beautiful and unique place. There are so many native birds to see and hear it is an ornithologists dream. The Halemaumau caldera is an absolute wonder.

These unique experiences are constantly disturbed by the tourism helicopter activity. The helicopters arrive slightly before 8am, and there is a non-stop din of noise throughout the morning as one copter leaves another takes it's place. There is not even a moment of silience. This repeats several times throughout the day.

I like to hear the birdsong, and it is washed out during the tours. It makes me wonder how the birds are affected by this unnatural noise in a national protected area. Does the noise disrupt the breeding habits of the rare and endangered species? Does the noise of the copters cause stress? (It does for humans). Has the influence of helicopter noise on birds even been studied? My guess is the noise negatively impacts the quality of life for the birds, because it certainly does for humans.

A perfect example of the disruption of the copters is that when the fissure is active, it makes a ominous noise, not unlike a running jet engine. I went to the caldera to record the fissure noise for my mainland friends and was unable to hear anything except the din of the copters as one circles the caldera multiple times, then as soon as it leaves another approaches. Without a moment of silence.

The idea of the parks should be to lose yourself amongst the beauty of nature. To learn to enjoy, and respect this great planet. This is completely ruined by the tourist helicopter activities.

Ideally, I would like to see the tour helicopters completely restricted from the park airspace. I know that this restriction is unlikely. However there must be measures in place to reduce the noise and frequency of the visits. Presently the helicopter activity is out of hand.

Mahalo for reading my comments.

-Jack

Correspondence ID:	822 Project: 103522 Document: 118739
Name:	Young, Christopher
Received:	Mar,30 2022 15:54:38
Correspondence Type:	Web Form

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plans for Hawaii Volcanoes National Park.

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Correspondence ID:	823 Project: 103522 Document: 118739
Name:	Connelly, Shari
Received:	Mar,30 2022 16:23:59
Correspondence Type:	Web Form
Correspondence: Aloha,	

I agree with the significance of severely reducing helicopter flights over the VNP for cultural, environmental, and visitor experience as stated in the reports above. That said, I also firmly believe that the park has a duty to protect the peaceful enjoyment of the residents that live near or in the park and the wildlife that exists in this area. I took a video of my backyard in the morning at approximately 8:00am daily for three weeks. I also took a video of our daily walk in the Tree Molds park and Kipuka Puaulu Bird Trail. I also timed the disturbance of each helicopter in approach, circling the crater, and departure. It averages twelve minutes of noise for each one. It is disturbing to watch those videos back. What is the sense of funding those parks if you cannot enjoy the purpose of those parks, let alone being disturbed in our own backyard.

We live within walking distance of these parks and very near the Keauhou Bird Conservation Center that houses the extinct in the wild Alala. I am shocked that these beautiful, important places are disturbed by copter flyovers on a daily basis for almost the entire morning and sporadic in the afternoon. There is not a single day that you can count on peace in the sky. I also took recordings of my daily backyard morning visit by the Oma'o, hoping that they will nest, and the Apapane. The recordings all have helicopter noise in them and are extremely loud. We also frequented the park itself and find that we come home feeling sad rather than invigorated.

Our neighborhood here in the Volcano Golf Course Subdivision has several retired people, ornithologists, biologists, park rangers and people who are genuinely interested in the biology here. We spend hours taking care of and filling our yards with native plants that are important to the animal life here. It is disheartening to invest a life savings to live in a beautiful place such as this and see it disturbed by something that benefits a few humans at the expense of this special place. Why not make the visitor experience on the ground more interactive and interesting that you don't need to see it from the sky?

The duty to provide an environment that matches the purpose of the park is so very important as stated in your reports. Those attributes flow over the boundaries of the park and spread to the neighboring houses. I believe it is also the park's duty to consider the effect on these areas also. I have spoken with as many residents in this Golf Course subdivision as I could and have 100% agreement that this must change. Mahalo!

Correspondence ID:	824	Project: 103522 Document:	118739
Name:	carpenter, donald		
Received:	Mar,30 2022 16:34:29		
Correspondence Type:	Web F	orm	

Correspondence: Aloha, tour helicopter industry should be shut down until there is a governing body to control, noise carbon pollution, 90% of our islands are uninhabited, yet they fly over our homes towns farms low and loud, FAA flight standards Honolulu has an unhealthy relationship with the Tour Helicopter industry which makes safety huge issue, a uncontrollable nuisance,

Correspondence ID:	825	Project: 103522 Document:	118739	
Name:	Kulbeth, Jason			
Received:	Mar,30 2022 16:50:03			
Correspondence Type:	Web F	orm		

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Correspondence ID:	826	Project: 103522 Document:	118739	
Name:	carpenter, donald			
Received:	Mar,30 2022 16:50:22			
Correspondence Type:	Web F	form		

Correspondence: Aloha, tour helicopter industry should be shut down until there is a governing body to control, noise carbon pollution, 90% of our islands are uninhabited, yet they fly over our homes towns farms low

and loud, FAA flight standards Honolulu has an unhealthy relationship with the Tour Helicopter industry which makes safety huge issue, a uncontrollable nuisance,

Correspondence ID:	827	Project: 103522 Document:	118739	
Name:	Connel	ly, Matthew D		
Received:	Mar,30 2022 17:19:25			
Correspondence Type:	Web Fo	orm		

Correspondence: Aloha,

I'd like to voice my support for restricting air tours in the Hawaii Volcanoes National Park. I live in Hilo, but am a frequent visitor to the park and surrounding area (my parents live in the golf course subdivision). The park is an incredible place to see the raw power of the earth and the ability of unique life to spring up out of bare rock and create serene rain forests full of sweet smells and bird songs. It is a place to escape from the developed world and center yourself in nature. This experience is shared by nearly 2 million visitors annually.

Helicopter air tours, while offering exciting views of parts of the park that are otherwise inaccessible, are extremely disruptive to the park experience. One air tour can generate disruptive noise for more than 10 minutes, and with 10-15,000 flights annually, this disruption can become almost constant at times. Fewer than 100,000 visitors annually get to see the park from the sky, yet their presence affects the experience of the other 2 million.

Additionally, helicopter noise has been shown to impact native wildlife, particularly with regards to avian vocalization. Hawaii's native and endemic birds are an integral part of Hawaii Volcanoes National Park, and it is one of their last refuges protecting them from extinction. If helicopter noise is affecting their behavior and populations, it should be severely reduced.

In the spirit of providing a visitor experience that connects people to the natural value and beauty of a place, and protecting the wildlife that inhabit the park, please consider severely reducing the number of air tours operated within the park. I am in strongest support of Alternative 2 (which effectively bans all commercial air tours), but I understand that there is also some value in that experience (I have seen Pu`u O`o from a helicopter and it is something you never forget). Alternative 3 seems like a step in the right direction, but it would be nice to see the days of operation limited more, especially since flights would still be allowed on Saturday when a lot of Hawaii residents have time to visit the park. These helicopter flights also disrupt residents along the slopes of Kilauea and Mauna Loa as the helicopters transit from the airport to the park. Reducing Saturday flights would increase quality of life for our community.

Mahalo for taking the time to read and I look forward to seeing a productive solution to this issue.

Correspondence ID:	828	Project: 103522 Document:	118739
Name:	Kunigo	onis, Bob	
Received:	Mar,30 2022 17:41:08		
Correspondence Type:	Web F	orm	

Correspondence: aloha aside from the dailey noise which now is about 40-50 x a day low & amp; loud over my place in ainaloa, the possible crash on me is also a concern, BECAUSE of 'deals' with the faa the SAFE but more costly over longer water routes r IGNORED & amp; NOT MANDATED ... WTF... its better 2 chance KILLING INNOCENTS on the ground rather than SAFER flight paths over water? hb

Correspondence ID:	829	Project: 103522 Document:	118739	
Name:	Laeha, Deb			
Received:	Mar,30 2022 18:03:50			
Correspondence Type:	Web Form			

Correspondence: The tour helicopter industry has been allowed to operate virtually unregulated in the Islands for decades. These helicopters (and now fixed-wing planes) fly whenever, wherever they want with the only requirement to "fly neighborly" and "safely" (which is open to interpretation), These noisy nuisances have destroyed our once peaceful skies. This is especially true at the Hawaii National Parks where the incessant drone of helicopters is a travesty that degrades the experience for everyone on the ground.

Our National (and STATE) parks should be protected. No company or person has the right to destroy our national parks for any reason, especially tourism, that we have many other opportunities for different people of different abilities to enjoy our national parks. Air tourism is fundamentally inconsistent with the reasons for which we established our national parks to start with.

Debra Laeha

Correspondence ID:	830 Project: 103522 Document: 118739			
Name:	Rees, Whit			
Received:	Mar,30 2022 19:09:00			
Correspondence Type:	Web Form			

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support. Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	831	Project: 103522 Document:	118739	
Name:	Lukens, Susan A			
Received:	Mar,30 2022 19:32:21			
Correspondence Type:	Web Form			

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

• Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

• Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

• Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at

higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	832 Project: 103522 Document: 118739
Name:	Chun, Marylene O
Received:	Mar,30 2022 19:57:58
Correspondence Type:	Web Form

Correspondence: I would like to see helicopters n small planes limited to a maximum of 2 hours a day, preferably 7-9pm. Helicopters disturb the peace of the Park, all visitors, its fauna and birds, all of its hikes and along Mauna Loa Rd and the Bird Park, at ALL hours. Is an approach from the ocean possible as helicopters fly overhead n disturb Volcano Village's peace as well.

Just as tourist buses are now banned at some of O'ahu's beaches we should have quieter parks and environs for locals as well as visitors. There has to be a reasonable compromise between local interests (5,000 pop. in Volcano plus thousands of Park visitors) and the few who want to view the Park by air w the attendant commercial interests.

Mahalo for your attention to this matter.

Correspondence ID:	833	Project: 103522 Document:	118739	
Name:	Baldwin, Robert			
Received:	Mar,30 2022 20:04:00			
Correspondence Type:	Web Form			

Correspondence: Please allow continued unrestricted access to public spaces in Hawaii Volcanoes NP via air. Only by air can one appreciate the extent of the lava fields and the extent of volcanic activity.

Correspondence ID:	834	Project: 103522 Document:	118739
Name:	Johnso	on, M	
Received:	Mar,31	2022	
Correspondence Type:	Web F	orm	
Correspondence: In general we prefer alterna	tive 3 wi	th a couple changes:	
We like:			

-Limited hours and days: 10 am - 2 pm; M, T, Th, F, Sa

-QT limited hours 10 am - 4 pm; M-Sa

-Routes: Northern, Coastal, Puu Oo, SW rift zone

-mandatory special event restrictions & amp; adaptive management

-mandatory training on cultural and natural park priorities

-cap on the number of flights per day and year

Change/add:

-Route: add lower Kahuku from Alternative 4,

-Route: Change Puu Oo to fixed entry/exit at ocean & amp; looping path of Alternative 4

Mahalo!

Received:

Mar,31 2022 01:05:45

Correspondence Type:

Web Form

Correspondence: I have lived near the summit of Kilauea Volcano since 1975. My home is about 2.75 miles (in a straight line) from Halemaumau Crater. There is presently the most noise from daily overflights here that I have ever experienced. The noise is intrusive and unwanted. Many times one flight overlaps the next, so there are few quiet periods. This is a type of pollution that does not belong in a National Park. It is a service for the few to the detriment of the many... both local residents and visitors exploring the Park at ground level. To my surprise, I recently learned that there are no regulations in effect for Park overflights. IF these overflights

To my surprise, I recently learned that there are no regulations in effect for Park overflights. If these overflights are to continue, I feel that there should be restrictions on both frequency and altitude. Fewer flights at higher altitudes would at least reduce the noise pollution at ground level, if not eliminate it. I believe that there are many individuals who feel the same that have not taken the time to send comments. I hope something will be done to reduce this kind of noise pollution in Hawaii Volcanoes National Park. Thank you for the opportunity to comment.

Correspondence ID:836Project: 103522Document:118739Name:Urli, LucijaReceived:Mar,31202201:49:12Correspondence Type:Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Correspondence ID:	837 Project: 103522 Document: 118739	
Name:	ANTONINI, GIULIO A	
Received:	Mar,31 2022 03:20:21	
Correspondence Type:	Web Form	

Correspondence: Awesome experience!

Me and my wife tried the helicopter without door with Paradise Helicopters. Was an incredible experience. Staff was so careful and so nice. I recommend to everyone a fly like that, we could feel the warm wen we flew over the volcano. I did a lot of pictures and videos.

Just one word: AWESOME!

Correspondence ID:	838	Project: 103522 Document:	118739
Name:	Tester	, John	
Received:	Mar,3	1 2022 05:27:22	
Correspondence Type:	Web I	Form	

Correspondence: Test message body

Correspondence ID:	9 Project: 103522 Document:	118739
Name:	awn, Tim	
Received:	ar,31 2022 06:02:50	
Correspondence Type:	eb Form	

Correspondence: Please ensure any new regulations allow tourism to continue from the air. As visitors to Hawaii NP we have viewed areas we otherwise would not have seen. It's crucial for me as a supporter of NP that all can see the beauty we protect.

Thank you.

Tim

Correspondence ID:	840 Project: 103522 Document: 118739	
Name:	oliver, chris e	
Received:	Mar,31 2022 06:20:25	
Correspondence Type:	Web Form	

Correspondence: The noise level from the helicopters is extremely bad. I feel over flights in the park should be prohibited.

Correspondence ID:	841 Project: 103522 Document: 118739
Name:	Moore, Dana
Received:	Mar,31 2022 06:25:38
Correspondence Type:	Web Form
immediate danger.	licopter flights anywhere over Hawaii except when there is erupted. It was fascinating and very meaningful.
Correspondence ID:	842 Project: 103522 Document: 118739
Name:	Lee, James
Received:	Mar,31 2022 08:20:07
Correspondence Type:	Web Form

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plans for Hawaii Volcanoes National Park.

I have serious concerns with the development process of the Air Tour Management Plans (ATMP) by the National Park Service (NPS) and the Federal Aviation Administration (FAA). NPS and the FAA have ignored 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. Excluding the NPOAG from providing input on the ATMP process is in direction contradiction of FAA Order No. 1110.138A.

NPS does not have the necessary expertise to fundamentally redesign the airspace over these parks. The ATMPs proposed by NPS would relocate, constrict, and combine flight routes and would make substantial changes to

flight altitudes. The current flight routes and altitudes have been in place for years and are well understood by industry. The changes proposed by ATMP have severe aviation safety implications that should have been deliberated in the NPOAG, as Congress intended in the National Parks Air Tour Management Act of 2000.

The proposals currently under consideration will force aircraft into potentially unsafe flight conditions. The NPS has proposed increasing the minimum flight altitude over Hawaii Volcanoes National Park from an allowed minimum 500 feet AGL to 1,500 feet AGL, which does not provide adequate safe options for navigation in typical weather patterns that exist in the park. Even more concerning is that the proposals have fixed narrow flight routes that do not take into account the areas constantly changing weather patterns.

I also have serious concerns with the economic impact these plans will have on helicopter air tour companies. The draft plans' flight allocation numbers do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change and NPS needs to respect that dynamic, as visitors alter their destinations according to those trends.

The NPS has failed to reach out to the operators to enquire what economic impacts might arise implementing a management plan that restricts overflights. Operators are already suffering economically post COVID-19, loosing over 80% of their businesses due to the shutdown of international travel. Further restrictions will cripple an already fragile industry trying to rebuild.

In 2020, Hawaii Volcanoes National Park welcomed 590,000 visitors, a 57% decrease from 2019 when the park welcomed over 1,300,000 visitors. This year many National Parks saw their resources strained by the large number of visitors as the public began to travel again. Air tours are an important option for many visitors conducting a one-in-a-lifetime trip to see famous natural landmarks. Visitors taking advantage of air tours benefit by avoiding traffic, wait times, and walking trails that are inaccessible for the handicapped or elderly, while reducing congestion and demand on park infrastructure.

Like ground-based tours, air tours are a valid part of our visitor experience, providing a unique window from which we can share our cultural, historical and environmental sites with the world. Air tours require no ground-based infrastructure at the park, which allows visitors accessibility without the need for roads, trails, signs, bathrooms, garbage cans, or other services.

By further restricting an already limited number of allowable air tours, we are reducing opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance. Through carbon-offset efforts and strict altitude requirements to control noise just to name a few efforts air-tour operators are working to ensure they are responsi

Correspondence ID:	843	Project: 103522 Document:	118739
Name:	Shutle	r, Eric r	
Received:	Mar,3	1 2022 09:33:53	
Correspondence Type:	Web F	orm	

Correspondence: I rode the helicopter while visiting the big island. I think it was great to be able to see the island in that way. That said, I found the helicopters distracting at Waimea Canyon. I don't think they need to go down in the canyon. they can observe from above.

Correspondence ID:	844	Project: 103522 Document:	118739
Name:	Kauahi	kaua, James P	
Received:	Mar,31	2022 10:42:07	
Correspondence Type:	Web Fo	orm	
Correspondence: I favor Alternative 2.or 4. If	I am only	y allowed to favor one alternative	e, it would be 2.
Correspondence ID:	845	Project: 103522 Document:	118739

KUBO, STANLEY Y

Name:

Received:

Mar,31 2022 11:19:55

Correspondence Type:

Web Form

Correspondence: I AM A HEARING IMPAIRED VIETNAM VETERAN (SERVICE CONNECTED). ONE CANNOT APPRECIATE THE LACK OF NOISE POLLUTION UNTIL THEY HAVE EXPERIENCED THE NEAR ZERO MAN-MADE NOISE OF THE ALASKAN WIDERNESS. DURING THE COVID PANDEMIC, AIRCRAFT NOISE WAS AT A MINIMUM AND THE RESULTING LACK OF THAT NOISE WAS VERY NOTICEABLE AND RELAXING. DURING MY TOUR OF DUTY IN SOUTHEAST ASIA, THE SOUND OF AIRCRAFT WAS WELCOME - BE IT FOR MEDEVAC, TRANSPORT, SUPPLY REPLENISHMENT, SUPPORT FIRE, AND EVEN FOR THE COMFORT OF A "SECURITY BLANKET". PRE-COVID, THERE WAS ALSO A SENSE OF PRIVACY INVASION AS AIRCRAFT, MOSTLY HELICOPTERS, DID NOT APPEAR TO RESPECT THE RULES EVEN OVER RESIDENTIAL AREAS. ALTERNATIVE NO. 2 APPEARS TO BE MOST APPROPRIATE. EXISTING ECOSYSTEMS DOES NOT

INCLUDE AIRCRAFT AND A 5000-FT ABOVE GROUND LEVEL WOULD PROVIDE A BUFFER IN AN ATTEMPT TO PRESERVE THESE ECOSYSTEMS.

ALTERNATE NO. 2 ALSO PROVIDES A MORE ENFORCEABLE MEANS OF REGULATION WETHER IT BE DUE TO HUMAN OR MECHANICAL/INSTRUMENT OR INTENTIONAL ERROR.

ALTERNATE NO. 2 AT A MINIMUM OF 5000 FEET ABOVE GROUND LEVEL SIGNIFICATLY REDUCES NOISE POLUTION. VIRTUALLY ELIMINATES SHADOW AND POLLUTION BY COMBUSTION ENGINES.

Correspondence ID:	6 Project: 103522 Document: 11	18739
Name:	abriel, Karen	
Received:	ar,31 2022 11:42:33	
Correspondence Type:	/eb Form	

Correspondence: I would like to express my concerns over the proposal to eliminate helicopter tours flying over the national parks in Hawaii. Taking the helicopter trip over Haleakala National Park was one of the greatest experiences I've ever had. Our national parks are a way for people from around the world to view these amazing places. I feel that the more people that can personally see these incredible places the more they will understand our complex planet and the urgency to save it. I would like my grandchildren to be able to the fantastic experience of seeing these wonders as I did. Thank you for your time and consideration. Karen Gabriel

Correspondence ID:	847 Project: 103522 Document: 118739
Name:	Modesitt, William E
Received:	Mar,31 2022 12:34:31
Correspondence Type:	Web Form

Correspondence: I have been visiting Hawai'i Volcanoes National Park for over 25 years, and always appreciate it's beauty, mostly by hiking on one of the many hikes. One reason I go to the Hawai'i Volcanoes National Park is to escape the noise and crowds found elsewhere on the island. Unfortunately this peace and quiet is at times disturbed by the irritating noise from tour helicopters. Helicopters noise should not be part of the park experience. I do not think any type of compromise will work. A total ban on tour helicopters is the only solution that will ensure a truly enjoyable park visit.

Correspondence ID:	848	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,31	2022 12:38:38	
Correspondence Type:	Web Fo	orm	

Correspondence: Aloha, I am in favor of ALTERNATIVE 2.

I believe that all our National Parks are sacred places and should be treated as such. I have been hiking in Volcano National Park many times and had the serenity of the my experience marred by a helicopter ( or 2 or 3) flying over. They are loud and they detract from the natural world that the park is there to preserve. Why should these helicopters have the right to interfere with the experience of the thousands of people who make the effort to come to the park and enjoy it as it is meant to be?

Correspondence ID:	849 Project: 103522 Document: 118739
Name:	Buck, Laura
Received:	Mar,31 2022 13:07:41
Correspondence Type:	Web Form

Correspondence: The air tours over our Volcano neighborhoods disrupt the peace of our community every day and make us fearful of an accident. These tours also disrupt everyone's enjoyment of the National Park and negatively affect wildlife, as has been shown to be the case, many times and in many places, to be a serious problem. I feel that none of the alternative plans are really what we in the community want, but if this is what we have to choose from, #3 seems the most comprehensive. Alternative #3 would at least provide some mitigation and help keep flight routes farther from neighborhoods and also give us respite from helicopters on Sunday.

Correspondence ID:	850	Project: 103522 Document:	118739
Name:	Daber	kow, Petra .	
Received:	Mar,3	1 2022 13:13:53	
Correspondence Type:	Web F	form	

Correspondence: Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Correspondence ID:	851 Project: 103522 Document: 118739
Name:	A Sprigle, David
Received:	Mar,31 2022 13:23:10
Correspondence Type:	Web Form
Company and an asy. Toymist and Commonsial As	in Troffic should be limited to over ODEN Ocean only. Not ever

Correspondence: Tourist and Commercial Air Traffic should be limited to over OPEN Ocean only. Not over any land or residential areas to protect, Both Humans and livestock and vegetation.

Please think of the people on these Islands

Many thanks

David

Correspondence ID:	852	Project: 103522 Document:	118739
Name:	Beach,	Renee	
Received:	Mar,31	2022 13:31:46	
Correspondence Type:	Web F	orm	

Correspondence: Air Tours are an essential element contributing to the accessibility of the park for all individuals. When my father visited Hawaii for the first time he was still healing after having suffered a stroke. At this point in time, he was not in a position to do large amounts of walking, let alone hiking which meant he was limited in what he could enjoy of the national park. Participating in an air tour allowed him to see the entire beauty of the park without restraints that ground travel/transportation limited him to. These perspectives must be included when creating and managing policy for national parks to ensure that all individuals are fairly represented.

Correspondence ID:	853 Project: 103522 Document: 118739
Name:	KAMAKAHI, ROBIN T
Received:	Mar,31 2022 13:40:07
Correspondence Type:	Web Form

Correspondence: I am submitting the following:

I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

Air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

I do strongly believe in allowing this natural phenomenon be able to be viewed safely by air ... going in by foot is ridiculous at times .. the last time I was visiting, we had to park close to the entrance and walk in .. can't really see Madame Pele in all her fiery beauty .. it's just breathtaking from the Air ! Total amazement and "chicken-skin" moments of one of THE treasures we still have here .. on this island ! The proposal to narrowing the flying corridor route and force pilots to go higher, doesn't make it "safer" given our topographical uniqueness ... inasmuch as Hawaii island has 21 ever changing micro-climates. My cousin came to visit (he has mobility issues) and was able to experience the park as well as the beauty of our waterfalls and shorelines from the air in a way he would never be able to from any ground tour. Please allow this opportunity to share the island ... allow Air Tours to "show off" our beautiful attractions!

Mahalo!

Correspondence ID:	854	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,3	1 2022 13:53:59	
Correspondence Type:	Web I	Form	

Correspondence: My Girlfriend and I recently visited the Big Island with my elderly mother and we took an Air Tour with Paradise Helicopters. It was such a amazing way for my mother to experience the power and beauty of Kilauea since due to her degraded ability to walk any measure of distance she would not have been able to see it any other way. I hope to see that the accessibility for other with limited mobility will still be able to visit and appreciate the natural wonders our national parks have to offer.

Correspondence ID:	855 Project: 103522 Document: 118739
Name:	Mchowell, Tiffany T
Received:	Mar,31 2022 14:01:40
Correspondence Type:	Web Form

Correspondence: I am concerned as a Hawaii resident, and a young adult born and raised in Hawaii, who works in the aviation industry that this ATMP will heavily affect my job and ultimately the aviation industry. I'm a wife to a helicopter pilot, friend to many helicopter pilots and an employee to a locally owned helicopter business.

The ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

Air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Mahalo, Tiffany Received:

Mar,31 2022 14:02:02

Correspondence Type:

Web Form

Correspondence: I can't imagine not being able to view volcanoes from the sky. NPS needs to take in consideration that military helicopters have the majority of the impact on noise pollution. The tour industry creates revenue for the state and if you eliminate this facet, you will be hurting only yourselves. You have to realize that views from this perspective is an incredible way to keep memories and to keep the ball rolling for tours which in tails help and support for each community around the US. Limiting this will only keep us from reaching our goals as a society for change and prosperity. Thank you I hope you make the right decision

Correspondence ID:	857 Project: 103522 Document: 118739
Name:	Shanaman, Kurt
Received:	Mar,31 2022 14:06:13
Correspondence Type:	Web Form

## Correspondence: Aloha!

My wife and I bought a property in Volcano Village in 2000 and had a home built and completed by 2003. We lived and worked in Honolulu and would fly over every month for the peace and tranquility of the lush rainforest that we so love.

In 2006, we moved over permanently to retire here. It was peaceful, with the sounds of Apapane and other birds singing throughout the days. The fog settled in on a picturesque landscape.

What we didn't count on was the ever-increasing flights of helicopters flying at very low altitudes over our home. It was so disturbing that our dog would bark at the helicopters! Many flights came over all flying at different altitudes and the noise was incredible. There was a time when my house actually shook from the pressure waves of the rotors! That was a one-time event but it made me realize what a problem these flights were.

As an aside, I was a medic during the Vietnam war and routinely flew missions on a "Huey" military helicopter. I am familiar with helicopter operations and the noise levels they produce.

I understand the need for tour companies to shuttle tourists and sight-seers to the National Park. It is a fantastic geologic event to witness. What I see is tour companies who realize the noise, discomfort, and stress they invoke on the communities with their flight plans and care little about it. They ignore the cost of the distress they impose on our privacy and our right to solitude.

Flight plans could be easily altered for an off-coast approach to the Park but that would incur more fuel, time, and maintenance to the aircraft. It could easily be made up by increasing prices for their services. I am sure they will have many talking points as to why they cannot do this but it all comes down to profits over people.

I implore you to consider what I have suggested, have them change to off-coast approaches to the Park and you will have many residents of these communities on the islands, happier and able to live their lives without the endless noise, pollution, and damage to their peace. This could also be done on Maui for Haleakala Park also.

There is another helicopter flying over my home as I type this testimony. This has been an issue for a very long time. Please side with the residents and establish rules that would protect us from this constant harassment.

Thank you for your consideration.

Kurt Shanaman and Teresa Evangelista Volcano, HI

Correspondence ID:	858 Project: 103522 Document:	118739
Name:	, David	
Received:	Mar,31 2022 14:10:52	
Correspondence Type:	Web Form	

Correspondence: I made continuous one hour recordings of both audio and decibel measurements from one of the Quiet Zones posted on the crater rim trail at Halema'uma'u. The recordings were made at a random time roughly 9am to 10am on a random day in March 2022. In the uninterrupted 60 minutes of the recordings there were \*less than 3 minutes\* of no overhead air traffic noise that I could hear. Therefore there was absolutely no quiet witnessed in the Quiet Zone or anywhere else surrounding the crater for 95.0% of the period recorded. Digital Recordings are available on request.

You will hear at least one but more frequently 2 or 3 helicopters creating noise pollution as well as air pollution and other safety risks. Please respect resident and visitor rights to enjoy the natural beauty in the park without continuous fully distracting and irritating audio disturbances. Permanently eliminate all helicopter tours Hawaii Volcanoes National Park.

Correspondence ID:	859 Project: 103522 Document: 118739
Name:	Camara, Bobby
Received:	Mar,31 2022 14:55:17
Correspondence Type:	Web Form

Correspondence: I am commenting, again, on the ATMP for Hawai'i Volcanoes National Park (HAVO), in unequivocal support of Alternative 2. ALTERNATIVE TWO.

This process has ridiculously gone on for decades with no resolution. We are tired of commenting, of attending meetings, of beseeching, of begging. Enough!

I was born and raised in Honoka'a on the Island of Hawai'i, and am retired from HAVO. I am a naturalist and have spent much of my life outdoors. I find it interesting that now we must submit "substantive comments". Why? Isn't "voting" for one option or another enough? More barriers and hoops to obstruct and delay process are not helpful.

When one is in the park, in a designated Wilderness Area or not, helicopter and other aircraft noise of commercial air tours, as well as noise of random military aircraft "sightseeing", is extremely intrusive. They can be heard approaching from miles away. We want to be "in nature", not an urban area. Since Halema'uma'u has been erupting, every single day, all day, many helicopters circle Kaluapele, the summit caldera of Kīlauea. Passengers see what they can in a minute or two. But during that brief time, if I'm talking with friends or with a group about Pelehonuamea, I have to almost shout to be heard. Birdsong fades into the background. The sound of Pele erupting disappears. For what? So tourists can take a few pictures?

Many consider Kaluapele a wahi kapu, a sacred place where cultural rules apply. It is the home of Pele, the elemental force who has created, and continues to create, Hawai'i nei. Others talk of it as a "church". Is it OK for helicopters and the occasional jet aircraft to buzz a church during a service? Should a helicopter circle St Peter's Basilica as the Pope addresses a crowd?

All of Hawai'i Volcanoes National Park is eligible for inclusion on a Federal List of Traditional Cultural Properties because of its importance to Native Hawaiians and their culture. Commercial air tours are not part of that importance.

Tour companies tout "accessibility", or a "right" to do business. How is it accessible to charge hundreds of dollars a seat? Drive to the park and witness eruptions from many viewpoints. Watch the glow of Pele at night in blessed silence when helicopters aren't allowed to fly. Not everyone has a right to go where ever or do whatever they want. There are always rules. Rules allow for a civilized society.

It's long past time to make a decision in favor of honoring and respecting the lands and Native Hawaiian culture of HAVO. The establishment document of HAVO states:

"The tracts of land on the island of Hawaii and on the island of Maui, in the Territory of Hawaii, hereinafter described, shall be perpetually dedicated and set apart as a public park or pleasure ground for the benefit and enjoyment of the people of the United States, to be known as Hawaii National Park. Said tracts of land are described as follows:" Note: "public park or pleasure ground", not pleasure air...

Correspondence ID:	860	Project: 103522 Document:	118739
Name:	Tollefs	sen, Sharon	
Received:	Mar,31	1 2022 15:43:49	
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

Air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	861 Project: 103522 Document: 118739
Name:	, cheryl
Received:	Mar,31 2022 16:18:22
Correspondence Type:	Web Form

Correspondence: I support limiting flights for HVNP. I believe they should have specific routes thru the park, with specific ingress and egress. Flying should be no lower than 5000 feet. There should be no more than 10 flights daily, with 2 no fly days each week totaling 3,570 flights annually. I support this based on the following: 1.) The communities surrounding the park purchased in the area for the beauty of the flora and fauna and the peace and quiet of nature. Not to have helicopters buzzing over them constantly. 2.) The carbon footprint and cost of the fuel does not benefit our island. 3.) As the pandemic has shown us, we need to limit some of the tourism to protect the beauty of our land. 4.) We need to put our culture and island first before tourism and preserve what makes our island special. 5.) We need to protect our wildlife against this man made risk. Thank you for your time.

Correspondence ID:	862 Project: 103522 Document: 118739	
Name:	Simon, Roy	
Received:	Mar,31 2022 16:22:26	
Correspondence Type:	Web Form	

Correspondence: 1. Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

2. Air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

3. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

Correspondence ID:	863 Project: 103522 Document: 118739
Name:	Yaplee, Darlene
Received:	Mar,31 2022 16:47:43
Correspondence Type:	Web Form

Correspondence: RE: Hawaii Volcanoes National Park

As a visitor to Hawaii national parks I urge you to enact full protections for Hawaii national parks. Therefore option 2 is the only acceptable option, please ban tours outright in the ATMP areas. All tours within one-half mile of the park boundaries and below 5,000 feet above ground are disruptive to park tourists and local residents. No company or person has the right to destroy the Hawaii national parks for any reason, including tourism. Air tours are the opposite of why national parks were established.

My comments in this entry are in addition to any previous comments submitted.

Correspondence ID:	864	Project: 103522 Document:	118739
Name:	CARR	ILLO, LISA	
Received:	Mar,3	1 2022 16:53:49	
Correspondence Type:	Web F	orm	

Correspondence: I personally disagree with Congressman Ed Case's article in the West Hawaii Today. I side with the people who are unable to view our national parks with no other way than a helicopter. I had elderly Kapuna who's dying wish was to see the National Parks from the sky as they were to feeble to hike through. I share the view of my fellow aircraft teammates in the following bullet points:

Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

Air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP

ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	865 Project: 103522 Document: 118739
Name:	Schlappa, Karin
Received:	Mar,31 2022 17:08:36
Correspondence Type:	Web Form

Correspondence: While the park is the main fly-over area for air tours, neighboring communities are certainly affected by air traffic, the park MUST consider that any alternative to the current situation should not make the noise impact worse for nearby residents. I live 2.7 miles from the nearest park boundary, 5.5 Miles from Puu Oo. I live in a neighborhood with large lots, low population density, more than two miles from HWY11 and am still daily annoyed at noise, not from car traffic or people but because helicopters fly close enough and low enough to disrupt our peace.

Alternative 4 stands out as completely unacceptable in this respect since it allows loitering and circling along the Puu OO route. If air tour traffic is restricted from flying over the summit caldera, even more air traffic would be shifted towards Puu Oo, this would affect a lot of people living in our rural subdivisions. Additionally, the absurdity to allow for only one day per week of quiet for bird watching is mind boggling. At a park that was set up to protect natural resources? How was this option even considered as an alternative?

Similarly Alternative 3 is shifting a lot of air traffic to impact residents of Pahala and increase air traffic to Puu oo. While Kau between Pahala and the summit area is sparsely populated, I can't imagine people living in the area will be thrilled to have a lot more helicopter noise. In addition, it increases air traffic along the coast. Yes, there is the ½ mile corridor but that is not enough to make the noise less irritating for visitors who want to enjoy the remote coastline. What is the point of going out into park wilderness if you're affected by air traffic noise?

According to this document only 3% of park visitors use helicopters but we let them dictate when we can watch birds? Let them disrupt wildlife? Let them ruin our wilderness experiences? Why give this relatively small group so much influence over Hawaii Island residents quality of life and the wilderness experiences of visitors/residents? With that in mind only alternative 2 makes sense, shut air tour traffic down as much as possible. If anything, the park should make sure to share with the county/state feedback they received from affected residents during listening sessions (people are suffering from the noise impact!!!) The goal should be to reduce air tours over the entire island for people and wildlife's sake.

What is the demographic of the helicopter customers? We can't do much about the folks who just want the best personal photo to post on Instagram. But there may be folks who chose a flight for other reasons. Are people with disabilities more likely to want to see wilderness from above? Can we improve some trails (pave) and provide access with electric scooters so that people with disabilities can have at least a limited wilderness experience? Kilauea Visitor Center has a big screen with showings of movies from eruptions. How many places are there in Hilo, Kona, Waimea that have similar screens and show recent activity at Kilauea? Imi Loa is one, but more could be set up with regular showings.

Are the helicopter customers aware of the impact of their flights on residents and wildlife? When I go to a hotel, I see plenty of flyers and tv ads advertising heli tours but no flyers that talk about the impact. Where is the park's outreach?

Correspondence ID:	866 Project: 103522 Document: 118739
Name:	Luera, Matt D
Received:	Mar,31 2022 17:13:13
Correspondence Type:	Web Form

Correspondence: I live right next to Kahaule'a Natural area reserve. A lot of the times helicopters are flying too low over my property. I'm not totally against the flights but they should be more respectful of the people who live beneath

their flight paths. I've seen them as low as just above the tree line. It would seem prudent to have their identification number on the bottom of the aircraft so we could identify them and file a report.

Correspondence ID:	867	Project: 103522 Document:	118739	
Name:	Shema, Nicholas P			
Received:	Mar,31 2022 17:27:14			
Correspondence Type:	Web F	orm		

Correspondence: With this latest eruption of Kilauea Volcano, there has been a very noticeable increase in the number of helicopter tour flights over my house in Volcano. It seems like the air tour operators are not aware of the disturbance they are causing all the people in their flight patterns. From what I can tell, the air tour operators leave Hilo airport, fly over the populated area of Hawaii Paradise Park, then fly over the 2018 eruption site disturbing those people with their noise, and then head up to the current eruption site of Kilauea volcano. They then buzz around this area for 5 to 10 minutes then head back to Hilo flying over all of the housing areas in their flight path, which includes Mauna Loa Estates where I live. On a Sunday morning while having breakfast on my front lanai, I counted 5 helicopters fly over our house in one hours time, leaving a trail of noise in front and behind them.

What I would like to see is the elimination of all air tour flights over Hawaii Volcanoes National park and surrounding air space. Or at least setting a specific time of day that flights can operate, preferable in the afternoon like from 1:00 p.m. to 5:00 p.m. This would allow quite time in the morning for not only all the people under the helicopters flight path, but also the people who are visiting the Park on the ground.

Another option would be to have the air tours fly off shore, away from the populated areas on their way up to Kilauea summit, and then return to Hilo following Stainback road avoiding high populated areas.

I feel that noise form air tour operators helicopters is a major problem for the thousands of people who are subjected to this intrusion into their privacy, and that it should be dealt with at once.

Mahalo

Nicholas P Shema

Correspondence ID:	868 Project: 103522 Document: 118739
Name:	Gale, Debbra M
Received:	Mar,31 2022 17:27:57
Correspondence Type:	Web Form

Correspondence: I have been informed of the newly considered proposals for The National Park Service (NPS) is requirement to create an Air Tour Management Plan (ATMP) for Hawaii Volcanoes National Park that would reduce pilot options that are needed to fly safely to avoid volcanic activity, weather, and other aircraft. Hawaii's air-tour operators are already strictly regulated on the number of flights and altitudes at which they can fly. In my experience I have fount that they provide safe, low-impact accessibility and enjoyment of our public areas.

The overly restrictive ATMP proposals that are currently under consideration constrain access to our public spaces and even have the potential to force longtime businesses on the Island of Hawaii to close for good.

Please take this into consideration when creating the plan to keep these businesses operating and to allow the beauty and amazing landscapes to be accessible by all..

Thank you

Correspondence ID:	869	Project: 103522 Document:	118739
Name:	locke,	nancy c	
Received:	Mar,3	1 2022 17:28:07	
Correspondence Type:	Web F	orm	

Correspondence: Re Alternative 1-4 of the draft ATMP, none is restrictive enough, in my opinion, because I feel that flying helicopters over/above an area that we strive to PRESERVE is antithetical to that goal, except in the

instance of emergency rescue or other such operation. Helicopter flights are intrinsically dangerous, are noisy, extremely disruptive on the serenity visitors seek when visiting a national park, and add fuel-based pollutants to an area we wish to preserve in a healthy state.

That said, Alternative 4 seems to most the most restrictive, in that flights are limited to east rift zone area and have limitation on annual number of flights (hopefully as few as one/week) and will include designated no-fly days. Because this alternative will have limits on range and number of flights, it's the best choice at this time.

Correspondence ID:	870	Project: 103522 Document:	118739	
Name:	Fuller, Kelley			
Received:	Mar,31 2022 17:45:24			
Correspondence Type:	Web F	orm		

Correspondence: I do not support the restrictions over the air space at volcano National park. This will hurt any businesses and has been allowed for years

Correspondence ID:	871	Project: 103522 Document:	118739
Name:	Shema, Patricia L		
Received:	Mar,31	2022 17:49:15	
Correspondence Type:	Web F	orm	

Correspondence: Aloha,

I fully support limiting aerial tours over all parts of the island, and particularly helicopter tours over HVNP, and the Puna/Ka'ū area. I live in Volcano and frequently hear the 'coptors flying overhead. The sound is disruptive and sometimes disturbing. The number of tour helicopters over the park is unconscionable, but each of these also affects everyone and everything along the flight paths . I can only imagine the effect these have on our large military Veteran population living in these areas. Additionally, I have parked many times in the cell phone waiting area at the airport in Hilo and watched tour groups departing and arriving, one after the other, after the other, after the other.

It is too much. This has been an issue for far too long. Pass the ATMP and implement it responsibly. Mahalo,

Patricia "Ricia" Shema

Correspondence ID:	872	Project: 103522 Document:	118739	
Name:	,			
Received:	Mar,31 2022 17:52:22			
Correspondence Type:	Web F	orm		

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

Air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further

restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated

Correspondence ID:	873	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,3	1 2022 17:52:23	
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

Air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated

Correspondence ID:	874	Project: 103522 Document:	118739	
Name:	Leinsing, Karl			
Received:	Mar,3	1 2022 17:53:12		
Correspondence Type:	Web F	form		

Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plans for Hawaii Volcanoes National Park. We need to work together with all the proper groups to come to an agreement that works for all. There are many advantages to helicopter tours and appreciate you considering the below, so that all can view the beautiful sites with the least amount of impact on the park locations.

I have serious concerns with the development process of the Air Tour Management Plans (ATMP) by the National Park Service (NPS) and the Federal Aviation Administration (FAA). NPS and the FAA have ignored 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. Excluding the NPOAG from providing input on the ATMP process is in direction contradiction of FAA Order No. 1110.138A.

NPS does not have the necessary expertise to fundamentally redesign the airspace over these parks. The ATMPs proposed by NPS would relocate, constrict, and combine flight routes and would make substantial changes to flight altitudes. The current flight routes and altitudes have been in place for years and are well understood by industry. The changes proposed by ATMP have severe aviation safety implications that should have been deliberated in the NPOAG, as Congress intended in the National Parks Air Tour Management Act of 2000.

The proposals currently under consideration will force aircraft into potentially unsafe flight conditions. The NPS has proposed increasing the minimum flight altitude over Hawaii Volcanoes National Park from an allowed minimum 500 feet AGL to 1,500 feet AGL, which does not provide adequate safe options for navigation in typical weather patterns that exist in the park. Even more concerning is that the proposals have fixed narrow flight routes that do not take into account the areas constantly changing weather patterns.

I also have serious concerns with the economic impact these plans will have on helicopter air tour companies. The draft plans' flight allocation numbers do not take into consideration fluctuations in the market and fluctuations in unforeseen and temporary operator limitations. Additionally, industry marketing trends change and NPS needs to respect that dynamic, as visitors alter their destinations according to those trends.

The NPS has failed to reach out to the operators to enquire what economic impacts might arise implementing a management plan that restricts overflights. Operators are already suffering economically post COVID-19, loosing over 80% of their businesses due to the shutdown of international travel. Further restrictions will cripple an already fragile industry trying to rebuild.

In 2020, Hawaii Volcanoes National Park welcomed 590,000 visitors, a 57% decrease from 2019 when the park welcomed over 1,300,000 visitors. This year many National Parks saw their resources strained by the large number of visitors as the public began to travel again. Air tours are an important option for many visitors conducting a one-in-a-lifetime trip to see famous natural landmarks. Visitors taking advantage of air tours benefit by avoiding traffic, wait times, and walking trails that are inaccessible for the handicapped or elderly, while reducing congestion and demand on park infrastructure.

Like ground-based tours, air tours are a valid part of our visitor experience, providing a unique window from which we can share our cultural, historical and environmental sites with the world. Air tours require no ground-based infrastructure at the park, which allows visitors accessibility without the need for roads, trails, signs, bathrooms, garbage cans, or other services.

Correspondence ID:875Project: 103522 Document:118739Name:K, KananiReceived:Mar,31 2022 18:14:33Correspondence Type:Web Form

By further restricting an already limited number of allowable air tours, we are

Correspondence: Aloha to all,

Flying air tours allow us to share our Hawai'i's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly. It also provides opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles on the aina.

Mahalo

Name:

Received:

Correspondence Type:

Mar,31 2022 19:14:19

Web Form

Correspondence: Alternative 2 would provide the best protection for the Park's natural and cultural resources. Locals and visitors alike should be able to enjoy the wilderness character of the national park without the noise pollution of helicopters.

Alternative 3 would make life much noisier for those of us who live in Volcano Village as flights would be directly over us. Good that there would be fewer flights than there are now and fewer restrictions for QT aircraft plus monitoring for compliance. Suggest few flights be over Volcano Village.

Alternative 4 would put most flights along the coast and away from the most active areas of the Park and away from Kipuka Puaulu. This is the best alternative for locals and for the visitors inside the Park.

Correspondence ID:	877 Project: 103522 Document: 118739
Name:	Hawk, Jeffrey A
Received:	Mar,31 2022 19:28:58
Correspondence Type:	Web Form

Correspondence: I live in the Volcano area and visit the park frequently. I have reviewed the draft ATMP and it is clear to me that Alternative 2 would be the best for the park and the surrounding community. Alternative 2 would best preserve the peace and tranquility of the park.

Air tours create noise. Part of the beauty of the park is the fact that it is one of the few remaining quiet places in Hawaii. You can hear many native birds in the park. Air tours drown out the bird calls and replace it with the roar of an engine. Allowing air tours will significantly reduce the beauty and natural sounds of the park.

Alternative 3 would allow the air tours into the central areas of the park and essentially ruin the peace and quiet of this remote area. People come form all over the world to hike the remote areas of the park and allowing air tours into the center of the park would ruin the experience there.

Alternative 4 would disrupt the many people who live and work in the area of the east rift zone. Helicopter over flights of residential areas are disruptive and annoying to the residents.

Thank you for your consideration.

Correspondence ID:	878	Project: 103522 Document:	118739
Name:	,		
Received:	Mar,3	1 2022 19:40:12	
Correspondence Type:	Web I	Form	
Correspondence: Looking over these charts,	it seems	to be a bad idea to have specific	routes. You will be

Correspondence: Looking over these charts, it seems to be a bad idea to have specific routes. You will be defeating what a aircraft can do and putting it on rails. Aircraft required to be on these routes will either go low to get around weather or they will fly into terrible weather. As you know the weather on the east side of the Big Island changes quickly.

Also some of these routes seem to be in a populated area, don't we want to have the aircraft fly where people are not located??

How about put a minimum altitude in certain areas??

What happens when the activity at the HVNP changes?

Are you going to have a whole new plan for a whole new area?

Correspondence ID:	879	Project: 103522 Document:	118739
Name:	Fujina	ga, Glen S	
Received:	Mar,3	1 2022 19:54:19	

#### Correspondence Type:

Web Form

Correspondence: The prohibition of ALL air tours within one-half mile of the Hawaii Volcanoes National Park boundaries and below 5,000 feet above ground is the most important element of Alternative 2 of the ATMP. Implementing this requirement would help significantly in reducing the intrusive noise levels generated by overflying aircraft. Tourists, including myself, like to visit parks and open spaces that offer (besides beautiful vistas and hiking trails) peace and quiet. A significant and much desired part of any journey into a National Park is to experience the natural sounds of the animals, the wind through the forests, waterfalls and in some cases the pure quiet and solitude.

In my opinion, the protection of all animals and plants that are native and endemic to a particular location should be the main and overriding reason for implementing any restrictions on noise and access by the public, whether for profit or not.

If Quiet Technology can indeed result in significant noise reduction, then this may be considered in modifying the ATMP to allow a limited number of overflights. Of course, the desired amount of noise abatement will need to be determined. To my knowledge, only the military currently has the technology to effect noise reductions in rotary powered aircraft. The actual decibel reduction amount is not data that is shared with the public.

Correspondence ID:	880 Project: 103522 Document:	118739
Name:	Schoffstall, Winona	
Received:	Mar,31 2022 20:20:36	
Correspondence Type:	Web Form	

Correspondence: We love the park and visit by automobile often. Very glad it has reopened. But we are not glad to have the helicopter traffic. They go directly over our house sometimes before 8 am . Sometimes way to low . People would see a lot more if they would drive themselves .

I hope for the peace and quiet we had last year. Something really needs to be done.

Thank you for your concern about the park.

WES

Correspondence ID:	881	Project: 103522 Document:	118739
Name:	Koegler, Freddy C		
Received:	Mar,32	1 2022 21:19:35	
Correspondence Type:	Web F	orm	

Correspondence: I would like to say that I grew up in Yosemite national park as a park brat and eventually became a pilot flying friends and family around the park for decades. The rules of altitudes over the park were fair and I always educated my passengers on why we flew higher in certain areas especially around the valley floor. Volcanos NP is no different where air tour company's can co-exist with the park and the NPS can provide the correct education for both the pilots and passengers so a mutual respect develops and both parties are not irritated by perceived noise on the ground and flight restrictions in the air around the vent.

Please don't knee jerk due to Congressmen's ire which has been redirected from Oahu to the BI. As a Colonel at Andrews AFB I flew a lot of members of congress on military helicopter sightseeing rides around DC at levels that the citizens in MD, VA and DC that we're essentially low compared to what is being argued about and each one knew what they were asking us to do. I now live next to Kaneohe bay Marine base and yes when the MH53 or Hueys fly by I pause conversation because it's loud. It is not loud at Volcano but it could be less.

Please do not restrict access to the park from the air. Just because Dept of Interior is the poorest part of our Federal govt does not mean you have to act like it. Set up rule and standards and put those wonderful interpretative rangers techniques to great use in education towards are pilots helping your visitors see the park from the air.

### Thanks Freddy Koegler Son of the longest serving Park Ranger in Yosemite NP

Correspondence ID:	882	Project: 103522 Document:	118739
Name:	Koegle	er, Freddy C	
Received:	Mar,32	1 2022 21:19:36	
Correspondence Type:	Web F	orm	

Correspondence: I would like to say that I grew up in Yosemite national park as a park brat and eventually became a pilot flying friends and family around the park for decades. The rules of altitudes over the park were fair and I always educated my passengers on why we flew higher in certain areas especially around the valley floor. Volcanos NP is no different where air tour company's can co-exist with the park and the NPS can provide the correct education for both the pilots and passengers so a mutual respect develops and both parties are not irritated by perceived noise on the ground and flight restrictions in the air around the vent.

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Correspondence ID:	883 Project: 103522 Document: 118739
Name:	VanLuven, Joel A
Received:	Mar,31 2022 21:28:46
Correspondence Type:	Web Form

Correspondence: There needs to be a balance that limits the number of flights, the area where flights take place and the hours that are open for these flights. There needs to be an agreement between the tourism industry and the residents of the area regarding these issues that needs to be renegotiated on a regular basis (annually) where the residents need to recognize the importance of the tourism industry and the tourism industry recognizes the possible disruption of the residents day to day life. A panel of representatives consisting of equal members of the tourism industry and residents of the affected area with the possible inclusion of members of the local governing body. Rules on how the process would operate would be created by this panel. Thanks for the opportunity to comment

Correspondence ID:	884 Project: 103522 Document: 118739
Name:	Peterson, Gordon B
Received:	Mar,31 2022 21:54:15
Correspondence Type:	Web Form

Correspondence: Air tours have no place in our national parks. Our national parks belong to the people and not intended as money makers for air tour operators. The disruption caused by air tours is in complete contradiction with the purpose and sanctity of our national parks. I support alternative #2 to the ATMP as it appears to be the

strictest. The 5000 ft above ground requirement needs to apply not only above national parks, but also the entire air tour route. Many, many air tour flights per day over Hawaii communities are very disruptive to those who live under their flight paths. I further support complete ban of air tours over national parks and believe that state parks should be included in any restrictions as well.

Correspondence ID:	885	Project: 103522 Document:	118739
Name:	Hink, Lani		
Received:	Mar,31 2022 22:10:47		
Correspondence Type:	Web F	orm	

Correspondence: Commercial helicopter tours have been a strongly negative presence for residents of East Hawaii, and particularly in the Puna district for several years. The FAA has thus far been unable or unwilling to effectively monitor commercial helicopter tours on Hawaii Island, leaving the burden of proof of flight violations to the residents who are forced to endure the excessive noise, invasion of privacy and disrespect the helicopter tours flying very frequently and at seemingly very low altitudes over their personal residences. Flights frequently occur from early morning to sundown and although restricted, occassionally at night. Commerical helicopter tours over Hawaii Island give the impression of being an unregulated industry in which the negative consequences of their doing "business as usual" is ignored by the authorities who are designated to monitor them. The negative effects of excessive helicopter flights have triggered PTSD in vulnerable populations, caused undue noise and stress on many residents including the elderly, infirm, children, pets and livestock. Visitors to Hawaii Volcanos and other National Parks deserve the highest quality visitation possible, especially as it may be a once in a lifetime opportunity. Helicopter tours must be infrequent, unobtrusive and strictly regulated in our National Parks for visitor safety and enjoyment and also the health and wellbeing of the park employees, animals and ecosystems they rely and benefit so greatly from.

Correspondence ID:	886	Project: 103522 Document:	118739
Name:	Withheld, Name		
Received:	Mar,31	2022 22:13:07	
Correspondence Type:	Web Fo	orm	

Correspondence: Please consider the strongest possible regulation of the airplane and helicopter traffic by choosing the most restrictive choices for times and days of operation, as well as, altitude over the park. We as a community have long endured the inconsiderate, noisy violation of our privacy and peaceful enjoyment of our homes as tens of thousands of tourists with cameras occupy the airspace above us due to volcanic activity at Hawaii Volcanoes National Park. By regulating the timing and times of flights into the park the community will benefit as the tour operators aren't giving tours over Hawaiian Paradise Park or other neighborhoods. For many years the air traffic over our community has been increasing as is our population and tourism due to the volcanic activity. The time frame you have selected between 2017-2019 as a baseline was really an unmanageable number of flights which were unmanaged by the FAA, county and state with the helicopters flying quite low and noisy over our homes, schools, parks, playgrounds at all hours every day without regard to the quality of the lives of the residents. 12,000 flights a year is an obscene number with the lions share belonging to one company who has shown to be a poor neighbor.

The \$25 per tour you seek to charge is minimal in comparison to the negative experience of your neighbors who would be subject to circling and a continuous stream of flights. Perhaps consider a fee structure that increases significantly with the amount of flights by any operator flying over the park considering the increased inconvenience to others as they seek to enjoy themselves outdoors for pleasure, spiritual practices, meditation or exercise. There should be more than one day a week without commercial flights and consideration to the same during holidays and total restrictions regarding bad weather when these operators skirt the VFR flight rules and try to fly under the weather buzzing our homes.

Fifteen hundred feet above ground is far too close and negatively effects those traveling into the park to experience nature's spectacular events here. Five thousand feet is much more appropriate. Given the remote location almost all of these people travel at great expense and effort, pay an entrance fee and deserve to have that

experience without all that noise and should be able to hike and take photos without aircraft in them or being photographed from above as they commune with Pele and revel in the creation and destruction happening simultaneously.

If you intend to let these aircraft circle are you prepared for the liability from potential accidents, close calls and mechanical failures that are likely to occur? Higher elevations are safer for those on the ground. We have had a number of helicopter and plane accidents already. Since the airspace above the park is uncontrolled by the FAA it is your responsibility to establish safety standards to protect your visitors and if you intend to charge guests on the ground you should protect them.

Correspondence ID:	887	Project: 103522 Document:	118739
Name:	Miller, Marla L		
Received:	Mar,3	1 2022 23:18:43	
Correspondence Type:	Web F	orm	

Correspondence: As a resident in the Puna area, I have been overwhelmed by the noise of tourist helicopters for years. The owners of these businesses do not care about the people that live on the land that they fly over. We have the right to peace of mind and quality of life. These rights are more important than the profits of these businesses.

Correspondence ID:	888	Project: 103522 Document:	118739
Name:	RUPPERT, ERIC R		
Received:	Mar,3	1 2022 23:24:40	
Correspondence Type:	Web F	orm	

Correspondence: The National Park Service (NPS) is required to create an Air Tour Management Plan (ATMP) for Hawaii Volcanoes National Park.

The overly restrictive ATMP proposals that are currently under consideration constrain access to our public spaces and even have the potential to force longtime businesses on the Island of Hawaii to close for good. Importantly, several of the proposals reduce pilot options that are needed to fly safely to avoid volcanic activity, weather, and other aircraft. Hawaii's air-tour operators are already strictly regulated on the number of flights and altitudes at which we can fly.

My wife and I have been on an air tour of the volcanic sites of Hawaii and we were impressed and been educated on the islands sites and are sure that more people should see these sites as.

Correspondence ID:	889	Project: 103522 Document:	118739
Name:	Dorn, Adri		
Received:	Mar,31 2022 23:29:25		
Correspondence Type:	Web F	form	

Correspondence: Aloha National Park Service,

As a Resident of Hawaii (The Big Island), I am concerned about the new regulations that your organization wants to implement towards the elimination of air tours over the park(s). I consider that those are restrictive. The proposals are targeting one well-established and already heavily regulated part of the local economy: air tours.

Please, take into consideration that during the air tours the pilots have the opportunity and are the connection to share and teach the visitors/guests about Hawaii, its culture, history, and the kuleana with the 'aina. In addition, air tours are an alternative for people with physical limitations.

Another important aspect is that while visitors are enjoying their tour by helicopter, they are in the company of a guide (the Pilot) who is in control and in charge of the tour. This gives the opportunity to observe and get to know the park without causing an environmental footprint; unlike the tours that the visitors can make on their own,

driving, given the case, can disturb the local fauna and flora. By this, what I mean is that the air tours provide an alternative opportunity that is less invasive.

There is a lack of voices representing the industry in this matter and this is concerning, there is only a one-month comment period which is not enough, especially when not all the parties involved and affected are underrepresented.

Thank you for the opportunity to express my concerns regarding the HVNP ATMP; I hope that the organization takes them into consideration.

Mahalo, Adri Dorn

Correspondence ID:	890 Project: 103522 Document: 118739		
Name:	Lepes, Marta M		
Received:	Mar,31 2022 23:48:34		
Correspondence Type:	Web Form		

Correspondence: I do not believe that helicopter tours are appropriate anywhere in the HVNP or SURROUNDING NEIGHBORHOODS.

There already is a certain amount of air traffic from HOV research.

My first exposure to the helicopters was when Puuoo was erupting. Walking to Napau Crater across the pahoehoe lava was excruciating with the frequent helicopter noise reverberating on the lava. Pilots flew low enough to be seen.

At present, on every clear morning there is a particular helicopter that loudly flies over my house in Volcano Village. It is so low that I can see the underside very clearly. It is silvery grey. You can not tell me that it is 5000 feet above me. Others come, but not as low.

Because there will always be flights that are too low, too frequent, too dangerous, too disturbing, I support the the proposal that there be NO flights over HVNP.

I would encourage visitors to see a film at the visitors center. It would have perfect weather, gorgeous views of the current eruption, and excellent narration. They could go home with a DVD so they could share it with friends and watch it repeatedly. AND it would be so much less expensive.

I have never visited another National Park in the USA, Canada, or anywhere else in the world where helicopters are allowed to buzz around frequently and annoyingly.

Marta Lepes

Correspondence ID:	891 Project: 103522 Document: 118739
Name:	Glory, Robert
Received:	Apr,01 2022 01:00:56
Correspondence Type:	Web Form

Correspondence: I have taken visiting family from the mainland on several occasions to visit the Hawaii Volcanoes National Park via helicopter and found the air tour leaves little or no environmental footprint or disturbance, unlike ground-based vehicles.

Air tours are a safe way to experience the park especially for the handicapped and elderly who otherwise would not experience this beautiful place in Hawaii. Our visitors commented on several occasions that their air tour of the national park was the highlight of their vacation in Hawaii. Forcing pilots to fly in fixed narrow routes and at higher altitudes then are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Hopefully air tours will continue as is and not be forced to tour other destinations. If given further restrictions, air tours would have to re-route over other areas on the Island of Hawaii which is not as attractive as the National Park.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air tour operators in the HVNP ATMP. The ATMP will affect our communities, our flight safety, the state's economy and park accessibility should many of these current proposals be incorporated.

Correspondence ID:	892	Project: 103522 Document:	118739
Name:	,		
Received:	Apr,01 2022 01:07:46		
Correspondence Type:	Web I	form	

Correspondence: As long time residents of Hilo and frequent visitors to HVNP we believe that Helicopter overflights should be completely prohibited.

One day, needing some nature to help me through a troubled time I went for a hike on the trail from Thurston Lava Tube toward Mauna Ulu and was astounded to find myself in a war zone of helicopter noise.

This has also occurred when Lava has flowed down the Pali's and you cannot hear the soft sounds of crackling lava and separating surface for the noise of competing helicopters.

With many competing developers working on quiet Electric fixed wing Aircraft the specific technology of Helicopters should be banned until suitable electric fixed wing options are available and those carefully chosen for quiet propeller design.

AND it is not only the National Park being impacted it is the residents who have chosen Hawaii or who have no choice being born here, and are severely affected along the To and From corridors.

Already it is well understood that Tour Buses and Tourists are not to be taken to Beach Parks on weekends and the Hawaii County Mayor has initiatives to formalize this direction and include others.

Any Tour which seriously impacts others is simply NOT OK.

Also our Hawaii Island Mayor has recently indicated that gasoline two stroke Lawn Mowers are to be phased out by 2024 both for pollution and noise...How can Helicopters possible not be included..??

Correspondence ID:	893 Project: 103522 Document: 118739			
Name:	Weber, Marybeth			
Received:	Apr,01 2022 01:23:50			
Correspondence Type:	Web Form			

Correspondence: I live in Volcano Village. As I'm typing this there is helicopters flying over my house. My windows are rattling. A helicopter just flew over my house that was way too low!! I can't even sit in my own yard anymore!! Stop the helicopters from flying over residential areas and limit the number of flights overall!! There are days that there are multiple flying over and the peace and quiet I live here for is disrupted. It affects my health. I want to see a complete stop to helicopters flying over at any given time is a must as well as alternate routes, higher altitudes, time of day restriction and any other restriction to restore peace over the island.

Correspondence ID:	894 Project: 103522 Document: 118739
Name:	Hobbs, Joe
Received:	Apr,01 2022 02:18:57
Correspondence Type:	Web Form

Correspondence: Please, please, please...protect the tranquility of the Aina and the quality of life of residents and Require all flights to and from HVP to follow an offshore route. Helicopters over houses are horrible.

Correspondence ID:	Project: 103522 Document:	118739
Name:	Friederich, Claudio	
Received:	Apr,01 2022 05:34:47	
Correspondence Type:	Web Form	

Correspondence: Any restrictions on air tours should be based on facts, established by scientific work done by wildlife and ecological experts.

They should not be based on complaints by "cultural activists". Here is why: A key point cited in the newsletter is air tours' effects on birds and their natural behavior. It was, in fact, the native Hawaiians who played a large part in the extinction and critical endangerment of Hawaiian native birds in the first place, largely for petty vanity purposes, namely chiefs needing feathered capes (in a hot tropical climate) and Kahilis just as symbols of "I'm the grand exalted pooba". So, if protecting native ecosystems is the issue, Hawaiian culture is not really in a position to comment. This is according to National Geographic, not personal feelings of one culture over another. If I sound prejudiced, let's just say that I have negative feelings against many things in most cultures of the world, including my own ethnicity's culture. Furthermore, the opinions of current activists do not necessarily reflect those of the ancient Hawaiians whose culture they claim to represent. For example, I doubt the ancient Hawaiians, who so valued astronomy because they depended on it for navigation, would have condemned the astronomy projects on Mauna Kea with the fervor we have seen from recent activists.

Restrictions should also not be based on issues of air pollution. All that is polluting is not man made. It is a volcano we are talking about, and the amount of air pollution, including greenhouse gases and sulfurous compounds, put out by a volcano will dwarf that put out by a chemical plant, let alone vehicles.

When harm to a natural environment by human activity is considered, all forms of human activity should be considered. In many national parks, Yellowstone being a notable example, foot traffic has become a major damaging influence. I am not saying that that is the case in Hawaii's national parks necessarily. I am pointing out that just because they are not in aircraft, that doesn't mean that a visitor leaves no impact, and that in fairness to everyone, all impacts, from all forms of visits, must be compared against one another before any one is restricted.

Finally, if air tours are restricted to particular routes, it must be made clear that, in the event of weather conditions making continuation impossible, the aircraft is allowed to exist the area of bad weather without fear of reprisal for being momentarily not on a route and over the park while exiting. Otherwise, crews will consider themselves forced to continue into deteriorating weather for the sake of remaining on a set route, and catastrophic accidents will occur. Hawaii is notorious for rapidly changeable weather, and in particular, clouds can form and move in in only minutes. Completely avoiding the possibility of weather deteriorating during a flight is impossible, and as a private pilot, I can personally attest to that. I can also attest to the effect of external pressures, such as facing a mountain of paperwork, on aeronautical decision making.

Correspondence ID:	896	Project: 103522 Document:	118739
Name:	HAWI	K, AUBREY A	
Received:	Apr,01	2022 07:19:36	
Correspondence Type:	Web F	orm	

Correspondence: As a Volcano Village resident, owner of a small B&B in the Village, and frequent user of the park, I submit my preference for Alternative 2. There are so few places we can go in the world that are free of man made noise. HVNP is filled with native birds and awe-inspiring natural landscape, where visitors can immerse themselves in peace. It must be protected from the constant annoyance and disruption of air flight tours, each one carrying only a handful of passengers (who could easily view the sights on video) while ruining the experience for thousands of visitors on the ground and degrading quality of life for area residents. Mahalo for this opportunity to give input, and please withhold my personal information (email, address).

Correspondence ID:	897	Project: 103522 Document:	118739
Name:	Hows	on, Bob & Jackie	
Received:	Apr,0	1 2022 09:15:39	
Correspondence Type:	Web ]	Form	
Correspondence: Dear Sir/Madam,			

I am concerned and dismayed about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP).

This was the highlight of our visit to Hawaii and would not have missed it for the world. I feel that you will be depriving future visitors of the spectacular views of your wonderful island. At no time did we feel unsafe and thoroughly enjoyed the whole experience.

Many of your proposed restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots and their passengers. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude.

Thank you for this opportunity to comment. I urge you to re-consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated. I also ask you to think about the experience you will be depriving the visitors of when they visit your beautiful island and experience the spectacular views and especially the views of the volcano that created it.

Bob & amp; Jackie Howson From the UK

Correspondence ID:	898	Project: 103522 Document:	118739
Name:	Dorn,	Calvin G	
Received:	Apr,01	2022 09:29:10	
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park. Certainly HVNP is large enough to allow people from all walks of life to be able to visit the Park in their own chosen form of transportation. Air tours are popular and cause a relatively small impact to the natural resources. No infrastructure, no trash, no invasive species introduction while providing an unmatched ability to safely view the wonders of volcanic activity. Even the National Park and USGS utilize helicopters to study, photograph and view their own backyard.

Our National Parks are just that, National. There has to be room for compromise on different methods to view the park and visitor experience is not just hold large expanses of the park for a small number of visitors.

Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

Air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	899	Project: 103522 Document:	118739	
Name:	Mannion, Matthew L			
Received:	Apr,01	2022 11:03:44		
Correspondence Type:	Web F	orm		

Correspondence: Growing up on the Big Island, I always wanted to share the beauty of this island with others. As a helicopter pilot, I'm able to share this island with many who could not otherwise access it like those with mobility issues.

We as pilots work very hard to change our flight paths and fly higher than the minimum altitudes to fly as friendly as possible. We live here too and all of us want to minimize our impact to the island while still allowing an equal opportunity for all to see it.

I see helicopters as another way to minimize the foot traffic and damage to the ecosystem that can occur from a strictly ground based tour infrastructure.

Correspondence ID:	900	Project: 103522 Document:	118739
Name:	WOJE	YNSKI, RAY	
Received:	Apr,01	2022 11:36:57	
Correspondence Type:	Web F	form	

Correspondence: I love seeing and enjoying the park from above, too. Please keep this rare and unique opportunity in place.

Ray

I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

Air tours leave little to no environmental footprint or disturbance, unlike ground-based vehicles. Eliminating or restricting air tours unnecessarily restricts accessibility to the handicapped and elderly, and increases the environmental footprint of those who do visit. Higher-flying aircraft spread their sound signature further. Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed will make flying less safe. The weather patterns at the National Park are

dynamic, and pilots need flexibility to make safe decisions and options for choosing their route and altitude. Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	901	Project: 103522 Document:	118739	
Name:	Case, Ed			
Received:	Apr,01 2022 11:58:59			
Correspondence Type:	Web F	orm		

Correspondence: Dear Superintendent Loh:

I write to provide comments on the four Air Tour Management Plan (ATMP) Potential Alternatives for Hawai'i Volcanoes National Park ("Park") as described in the Park's February 11, 2022 newsletter. As requested, I include here comments on all four potential alternatives. However, I strongly urge the National Park Services (NPS) to adopt Alternative 2, which would prohibit all air tours within the ATMP planning area.

# A. Overview

Congress passed the National Park Air Tour Management Act of 2000 ("Act") to minimize, mitigate and prevent the adverse effects of aircraft flights over our precious public and tribal lands. Prior to passage of the Act, commercial air tour operations over our national parks and other sensitive lands had increased rapidly, with many areas documenting accelerating increases over the previous decade. The intent of the Act is to prevent the resulting destruction of the natural habitat and visitor experience that was and remains core to the mission of our national parks, one of our country's most widely beloved and supported treasures.

In the fully twenty years it has taken to commence any serious effort to comply with the Act, the untenable impacts of commercial air tour operations have worsened materially. This comes just as our natural habitats are increasingly threatened by human and environmental factors and the public need for the peace and refuge and natural experience of our national parks has become even more critical.

There is no inherent right of commercial air tour overflight of our national parks and other sensitive lands, no inherent ability to disrupt the park experience, no inherent requirement to forge a compromise solution among competing uses. Commercial air tour overflights of our national parks and other sensitive lands offer no appreciable competing public benefit and in fact are inherently contradictory to the purposes for which our parks were created and are maintained. Our national parks were never intended and are not today intended for profit extraction at the expense of preserving the natural habitat and visitor experience. Even if some contribution to our national parks in terms of understanding and experience for a highly limited number of visitors could be argued from such operations, the volume and benefit of any such contribution is miniscule as compared to the far greater negative impact on the on-ground experience for far more visitors from such operations.

All of these factors are magnified in the case of Hawai'i Volcanoes National Park ("HVNP"). This truly precious park, established in 1916 and a designated International Biosphere Reserve and UNESCO World Heritage Site, "protects some of the most unique geological, biological and cherished cultural landscapes in the world." In 2019, pre-COVID, some 1.38 million visitors sought refuge in its natural beauty and scenic landscapes and understanding in its deep religious significance to our host culture.

Yet under current commercial air tour regulations, fully 26,664 tour overflights are permitted annually (or an average of 73 each and every day), at altitudes down to 500 feet above ground (not sea) level. In fact, from 2017 to 2019 an average of 11,376 overflights occurred annually, with fully 16,520 in 2017, far and away the most overflights of any park in the entire NPS system. There is no word that better describes the impact of these tours on the Park habitat and experience than "destructive". And for the sake of a mere 2-3% of Park visitors (assuming around three passengers per flight). I fully endorse the NPS' comment that a no-action alternative would "result in unacceptable impacts to Park natural and cultural resources, wilderness character and visitor enjoyment."

For all of these reasons, I strongly urge that in evaluating your four potential alternatives you apply every possible interpretation, decision and effort to impose the maximum limitation of commercial air tour overflights. This

should not be a matter of accommodating competing uses but of severely limiting and mitigating one use which is inherently contradictory to and destructive of another, far more important, one: the preservation of natural habitats and cultural heritage and the quality of visitor experiences.

### B. Comments to Alternative 1

Alternative 1 would take no action. I fully endorse NPS' conclusion that any course of action (including taking no action) that results in authorizing commercial air tours at or above the existing level of operations is unacceptable.

Congress was abundantly clear when passing the Act that the objective of the law was to develop effective measures to mitigate or prevent the significant adverse impact of commercial air tour operations on our national parks' natural and cultural resources. As we have seen over the past two decades, existing air tour operations have resulted in significant negative impacts on the Park's visitor experience, environmental management and cultural protections. These negative impacts are described in detail in the Parks' own document outlining the potential alternatives.

Under the no action alternative, operators would be allowed a number of overflights up to the Interim Operating Authority of 26,664 air tours per year. This number stands significantly above even the number of actual annual overflights since reporting began in 2013. I strongly urge the agencies to reject Alternative 1 on the grounds that it would result in an authorization of commercial air tours at or above existing operations.

# C. Comments to Alternative 2

Alternative 2, which would prohibit all air tours within the ATMP planning area, best meets the stated purposes of the Park and would result in the greatest protections for its resources.

Our National Park System was established to protect and preserve places of national significance for present and future generations. Hawai'i Volcanoes National Park itself with established by Congress in 1916 with the express direction for the Secretary of the Interior to publish "such regulations shall provide for the preservation from injury of all timber, birds, mineral deposits, and natural curiosities or wonders" and their retention in their natural condition as nearly as possible. NPS must meet this foundational mandate to retain the natural condition of the Park and protect it from the intrusive human impacts of commercial air tours.

In the Hawai'i Volcanoes National Park Foundation Document (updated January 2017), the Park lists fourteen fundamental resources and values (FRVs) "essential to achieving the purpose of the park." Among the FRVs are ecological integrity, natural sounds, night sky and scenic vistas, remote and challenging experiences, natural landscape character and the opportunity for traditional cultural use. Commercial air tours, in any number, fundamentally impede or damage each of these FRVs, including intrusion on Native Hawaiian cultural ceremonies and practices, interference of acoustic-based bird surveys and unreasonable impacts on interpretive programs and visitor activities throughout the Park.

Alternative 2 is the only option put forward by NPS that can meet the legislative mandate and protect the Park's fundamental resources and values. Allowing any number of commercial air tours in the planning area runs directly counter to Congressional intent and interferes with the fundamental resources, values and mission of the Park.

### A. Comments to Alternative 3

Alternative 3 provides a number of air tour routes to provide aerial access to historically active volcanic areas in the Park. This alternative, as outlined above, does not meet the Park's foundational goals and legislative mandates. This alternative rests on a fundamentally flawed assumption: that visitors are entitled to view areas of historic or actual volcanic activity from the air. First, doing so for this or any other purpose is destructive to the Park. Second, there are sufficient ground and interpretive resources to provide a sufficient education and experience as to volcanic activity, especially as compared to the damage from this particular form of experience. Third, visitors and natural resources are present on the ground and subject to destructive disruption from overflights throughout the Park, so any suggestion that the Park be balkanized into overflight vs non-overflight zones is itself fundamentally inconsistent with the Park in its entirety.

These sections, with some modification, are common to Alternative 3 and Alternative 4. My comments here apply as well to the corresponding sections of Alternative 4.

• Caps on Numbers of Flights Allowed Annually and Daily. First, any tour at any time on any day is destructive to the Park experience. It is possible that limitations based on soundscape modelling could mitigate some of those impacts. However, any such alternative, besides being strictly limited, should also consider a daily cap on the aggregate number of commercial air tours by all operators, not just per operator. It is critical to cultural practices, ecological integrity and visitor impact to consider the cumulative impact of air tour interference on any given day.

• Routes and Altitude. The minimum above ground level (AGL) altitude over wilderness areas should be substantially increased to further mitigate ground impacts. In accordance with "NPS Management Policies 2006 - Chapter 6: Wilderness Preservation and Management," the purpose of wilderness in the parks system includes the "preservation of wilderness character and wilderness resources in an unimpaired condition." Allowing overflights down to an AGL of 2,000 feet significantly impairs the soundscape character of wilderness area. I also reject the argument of tour operators that high minimum altitudes risk their safety and that of other air traffic. First, they are subject to regulation like any other air traffic, and second, if there is any such risk then they should not fly.

• Time of Day/Day of Week. The alternative should increase the number of prohibited flight days. To best align with the Park's goals and mandates, the vast majority of the week should be designated as no-fly days. The Park should select only one day during the week, and that a weekday, in which flights are permitted.

• Quiet Technology (QT) Incentives. As required by the Act, this alternative seeks to provide incentives for operators using QT aircraft. However, the technology does not yet exist under which destructive impacts are fully mitigated, so QT cannot be used as an excuse to tolerate continued destructive operations.

• Annual Meeting. This annual meeting between agencies and commercial air tour operators should also include interested community members. This will further the goal of fostering better relationships between communities and operators in conjunction with the Federal Aviation Administration Fly Neighborly training.

• Monitoring and Enforcement. Operators should be required to use publicly available flight monitoring technology when conducting air tours under the ATMP. There is no justifiable reason for flights operating under the ATMP to block real-time ADS-B Out position and identification. Although the identity of operators and their flight paths are already known, public transparency is crucial to fostering the relationship between neighboring communities, park visitors and the air tour operators.

### B. Comments to Alternative 4

Alternative 4 essentially seeks to limit destructive impacts further than Alternative 3, but has the same net impacts and effect. The following restrictions are still needed:

• Loitering/Circling. Loitering and circling should not be permitted along any route (under any alternative allowing continued operations). Because loitering (or circling or hovering or turning or changing elevation) substantially increases noise and soundscape impacts, air tours should be required to transit in a straight constant line at an even elevation to reduce noise.

• Time of Day/Day of Week. Daily flight hours should be further restricted. Morning and evening flights have a stronger impact not only on the visitor experience but also on surrounding communities. Restricting the permitted flight window to one or a few hours midday for one weekday per week will reduce the daily cumulative impact of air tours.

• Interpretive Training and Education. Training for air tour pilots should be mandatory. Historically, while some operators have acted neighborly and in good faith, others have flaunted the freedom afforded to them. Mandatory training will provide a baseline understanding of the Park's objectives.

### C. Conclusion

Because Hawai'i Volcanoes National Park is among the most impacted national parks by commercial air tour flights, I appreciate the government's increased attention to the Park's ATMP and decision to conduct the full public scoping process. To ensure that natural habitats, cultural practices and visitor experiences are protected, I urge the adoption of Alternative 2 as the only approach that realizes the purposes of the Act and meets the Park's legislative mandate.

I urge your full consideration and adoption into the ATMP of my comments and requested changes. Please context me through Kainan Miranda at (202) 225-2726 or at Kainan.Miranda@mail.house.gov with any questions.

Correspondence ID:	902	Project: 103522 Document:	118739
Name:	CRAI	G, JAMES S	
Received:	Apr,01	2022 12:08:02	
Correspondence Type:	Web F	orm	

Correspondence: Greetings,

My input will be short and to the point. I was a Naval Aviator for many years, flying a variety of helicopters on a variety of missions both domestically and overseas. I am well aware of how much noise helicopters make, and how much their rotor-wash actually affects the area around them. I am also intimately familiar with the dynamics of helicopter flight, the impact of evolving weather and wind patterns on such flight, and of the safety considerations unique to rotary wing aviation.

After the service, I spent over 20 years serving as a commissioner for two airports, one of which was literally within a tightly controlled conservation area. Those unfamiliar with the realities of rotary wing flight sought constantly to restrict helicopter aviation by exaggerating the negative impact helicopters might have on the area. I fear that such efforts have unduly affected the restrictions proposed for Hawaii here.

Quite simply, regulating helicopter tours and mitigating their impact on cultural and natural resources is entirely reasonable. Restricting pilots to narrow flight corridors which prohibits them from making intuitive decisions in dynamically evolving situations is not. I won't dissect the entire document, but language such as "weather that does not allow them to proceed further along the route at prescribed altitude, they must safely exit the route" is obviously problematic. How exactly are they supposed to do that? If you haven't prescribed that course of action in a way that allows for pilot judgment while protecting them from committing some flight violation, then you haven't thought this verbiage through sufficiently.

And nobody hires a helicopter to show them something from high altitude, so restricting operations to needlessly high altitudes to placate people who don't actually understand helicopter aviation is senseless. My two cents.

Respectfully, James Craig

Correspondence ID:	903 Project: 103522 Document: 118739
Name:	Robbins, Charles A
Received:	Apr,01 2022 12:23:08
Correspondence Type:	Web Form

Correspondence: I wanted to respectfully state my strong support for the "Alternative 2" limit of the ATMP for Hawaii Volcanoes National Park.

The Big Island is our home for 35 years and our family has hiked and camped in Hawaii Volcanoes National Park for multiples times each year. We have raised three, now grown children with camping and back country exploration part of who they are. Over 150 nights in the park, hundreds of miles hiked in the park, the parks helped form them, one is now a geologist, one finishing her studies in Wildlife Conservation. The beauty and diversity of life, the quietness and solitude and opportunity for our children and hopefully grandchildren to experience the these explicit goals for which our national park system was created is precious to us...without the whining of modernity and for-profit aircraft abusing the stated purposes of our national parks. in 2000 we strongly supported the passage of the ATMP and are dismayed that not only has a management plan never been issued, but the reasons for it have only gotten worse. Please follow the wishes of Senator Akaka and all of us he represented when the ATMP legislation was passed and help preserve our parks for the purposes for which they were created. For access limited visitors, HVNP is already on of the most accessible of our parks. Our state has whales and sea cliffs that are not in protected areas and for which air-tours may be a valid option, but please help our national parks to be what they created to be. Adopt the proposed Alternative 2.

Respectfully, C A Robbins

Correspondence ID:	904	Project: 103522 Document:	118739	
Name:	Robbins, D L			
Received:	Apr,01 2022 12:27:40			
Correspondence Type:	Web F	orm		

Correspondence: I also wanted to state my strong support for the "Alternative 2" limit of the ATMP for Hawaii Volcanoes National Park.

For 27 years our family has hiked and camped in Hawaii Volcanoes National Park each year. Our island's national parks helped form who our children have become. The beauty and diversity of life, the quietness and solitude and opportunity for our children and hopefully grandchildren to experience these explicit goals for which our national park system was created is precious to us...without for-profit aircraft abusing the stated purposes of our national parks. in 2000 we strongly supported the passage of the ATMP and are dismayed that not only has a management plan never been issued, but the reasons for it have only gotten worse.

Please follow the wishes of Senator Akaka and all of us he represented when the ATMP legislation was passed and help preserve our parks for the purposes for which they were created. Please help our national parks be what they were created to be. Adopt the proposed Alternative 2 for the ATMP.

Respectfully, D L Robbins

Correspondence ID:	905 Project: 103522 Document: 118739
Name:	Case, Suzanne D
Received:	Apr,01 2022 12:29:53
Correspondence Type:	Web Form
Correspondence: March 28, 2022	

Volpe National Transportation Systems Center Kaitlyn Rimol, V-326 Attn: Hawaii Volcanoes National Park ATMP 55 Broadway Cambridge, MA 02142

Dear Sir or Madam:

Subject: Department comments on proposed Air Tour Management Plan for Hawaii Volcanoes National Park

Thank you for the opportunity to comment the proposed Air Tour Management Plan for Hawaii Volcanoes National Park (Park). The Department of Land and Natural Resources (Department) appreciates the intent of the plan to reduce detrimental impacts of commercial air tours on the natural resources and values of Hawaii Volcanoes National Park.

The Department concurs that the current level of air tour activity in the Park results in frequent and loud noise disruptions that adversely impact resource management activities, traditional and customary practice, activities of spiritual and cultural significance, recreational and wilderness user experience, and potentially harm numerous endangered species that rely on the Park for critical habitat needs. The Department supports an air tour management plan that would prohibit air tours within the Air Tour Management Plan planning area, to include areas below 5,000 feet above ground level and within ½ mile of the Park boundary.

Impacts from commercial air tours are widespread in Hawaii, affecting thousands of acres of public trust lands that serve to protect Hawaii's unique biological and cultural treasures and to provide cultural and spiritual values for the public benefit. While we support the efforts of the Park and the Federal Aviation Administration (FAA) to regulate those impacts within the Park, we note that those measures may have the unintended result of increased commercial air tour traffic and impacts to those state lands. The Board of Land and Natural Resources raised those concerns with the FAA in a letter dated May 28, 2021. We look forward further collaboration with the FAA to address the unacceptable impacts of commercial air tour on public trust lands and natural resources in Hawai'i.

Please do not hesitate to contact me if you would like additional information.

Sincerely,

Suzanne D. Case Chairperson

Correspondence ID:	906 Project: 103522 Document: 118739
Name:	Wyeth, Heuionalani M
Received:	Apr,01 2022 12:33:51
Correspondence Type:	Web Form

### Correspondence: Aloha

I agree with Representative Case's comments in his letter to The Garden Island newspaper (published on 31 March). Enact full protections for our precious national parks and their users. Staff, visitors and the natural environment should not be subject to the noise and pollution created by air tours.

While I sympathize with the pilots and others who stand to lose employment if sir tourism is eliminated, I believe that the purpose of our national parks is to serve the nation, not just those relatively few citizens who can afford the luxury of an air tour.

Correspondence ID:	907	Project: 103522 Document:	118739
Name:	Irish, E	dward D	
Received:	Apr,01	2022 12:38:57	
Correspondence Type:	Web Fo	orm	

Correspondence: Aloha, I have lived in Hawaii since 2003, originally on Kauai and on Hawaii Island since 2007. I have always been aware of the disruption of my visits to the many beautiful places in Hawaii by the amount of helicopter traffic. In those first years of residency it was along the Kauai Na Pali Coast or hiking around Waimea Canyon, there was no escape from the sound of helicopters. Remote trails where I might not cross the path of a single other hiker for hours, but would repeatedly here the helicopters above. My visits to Maui were similar, and when I moved to Hilo I found that especially during periods of high volcanic activity the fly overs were constant. Growing up in Oregon and hiking and camping all over the Northwest this was never an issue. More starkly was the problem observed when in 2018 we traveled to a number of parks on the mainland including The Grand Canyon, Bryce Canyon and others, on that trip I only heard the disruptive sounds of the helicopters a couple of times, my hikes in the many parks we visited were filled with the sounds of nature, the wind in the trees. In addition to the disruption at Volcanoes National Park, the helicopters are flying repeatedly over residential areas and the coast, so if you are out on a sunset sail or whale watching with the sound of the wind in your sails and your craft cutting though the waves, plan on the sound of the Helicopters above also. We are told during election campaign periods that Hawaii needs to appeal to upscale tourism in order to keep Hawaii beautiful and special and still have a strong economy. This means to provide helicopter tours for these upscale tourists, if true then reduce the flights and raise the prices, if it's that's special and unique there will always be people willing to pay. Mahalo Ed Irish Hilo, Hawaii

Correspondence ID:	908	Project: 103522 Document:	118739
Name:	Nagasa	ko, Elna	
Received:	Apr,01	2022 12:59:37	
Correspondence Type:	Web Fo	orm	

Correspondence: As someone born and raised on the Big Island, the protection of natural and cultural resources is important to me. I strongly support restrictions on air tours over the Hawaii Volcanoes National Park. At minimum, I strongly urge that flights over sensitive natural and cultural resources be prohibited. I also support reducing the overall number of flights, setting minimum altitude limits, and having designated days of the week where flights are entirely prohibited. Protecting natural and cultural resources is essential for Hawaii's future, and restricting or prohibiting flights will benefit Park visitors, cultural practitioners, and local residents.

Correspondence ID:	909	Project: 103522 Document:	118739
Name:	Grotkiı	n, Jill	
Received:	Apr,01	2022 13:54:45	
Correspondence Type:	Web Fo	orm	

Correspondence: Aloha,

Thank you for this opportunity to comment on the ATMP Potential Alternatives. I am highly supportive of Alternative 2, prohibiting air tours within Hawaii Volcanoes National Park.

As a lifelong resident of the Puna District I have lived with the continuous daily noise and disruption from tour helicopters buzzing over our residence, along the coastline and over the rainforests. It definitely disturbs the peace of living in our quiet rainforest with the constant drone of one helicopter after another, I can only imagine how it negatively affects our wildlife and the fragile native ecosystems within the park.

I am also an owner and operator of a local tour company that conducts day tours and hikes within Hawaii Volcanoes National Park. The constant drone of these helicopters regularly disrupts our visitor's experience by interrupting interpretation of our natural environment and taking from the natural harmonic sounds of the 'aina at various viewpoints.

Please strongly consider implementing Alternative 2 of the ATMP Potential Alternative plan and prohibiting air tours within Hawaii Volcanoes National Park for the benefit of our fragile island ecosystems, native flora and fauna, and for both our kama'aina and malahini that wish to enjoy the peacefulness and true beauty of Hawai'i Island.

Mahalo for your support and consideration!

Correspondence ID:	910	Project: 103522 Document:	118739
Name:	,		
Received:	Apr,01	2022 14:09:30	
Correspondence Type:	Web F	orm	

Correspondence: 1. The objective of this project is stated in "Project Introduction" on page 2. "The objective of this 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, Native Hawaiian 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 Native Hawaiian Traditional Cultural Properties including Native Hawaiian sacred sites and ceremonial areas." [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 determined the current level of air tours is inconsistent with the Park's purpose and values." How was this determined prior to analyzing impacts in the EA? Again a premature determination.

4. The "Monitoring and Enforcement" section describes air tour operators requirement to report operations on a semi-annual basis.

Alternative 3 will require air tour operators to additionally...

a) "equip all aircraft used for air tours with flight monitoring technology"

b) "use flight monitoring technology during all air tours"

c) " The NPS would provide mandatory training for air tour pilots regarding Park resources. "

d) "Operators would also be required to complete the FAA Fly Neighborly training for their aircraft type."

These measures should be considered recommendations, as they may require legislation and/or rulemaking. The economic impacts need to be addressed in the EA/ROD.

5. The scoping document recognizes the requirement for quiet technology incentives. 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:	911 Project: 103522 Document: 118739
Name:	Boyea, Ralph C
Received:	Apr,01 2022 14:10:10
Correspondence Type:	Web Form

Correspondence: Please eliminate tour overflights at our national parks.

Our national parks are places of refuge from the hustle and bustle of everyday life.

They are perhaps the only place one can go to experience the sounds of nature.

It is a travesty to have that experience taken away from everyone to satisfy the few who can afford these overflights/joy rides.

Peace and quiet are rarely found in today's world. Please preserve that aspect of our national parks.

Correspondence ID:	912	Project: 103522 Document:	118739
Name:	Ellison	, Lorraine R	
Received:	Apr,01	2022 14:46:18	

Correspondence Type:

#### Web Form

Correspondence: First of all, thank you for efforts in options to the ATMP. Hawaii Volcanoes National Park is hugely significant as a place of scientific research geologically & amp; biologically, significant culturally and is a huge economic generator for the State of Hawaii and the Island of Hawaii. It is public land and, of those that value it, some will comment on the ATMP.

Alternative #1 disregard since it does not comply with The Act.

The elements of significance in Alternative #3 are, in my opinion, restriction of hours to 10-2pm & amp; 10-4pm for QT flight, & amp; no fly on Sundays because it allows some quiet hours within HVNP. The most significant elements are mandatory restrictions for particular events; participants and viewers can be present without disruption of air tour noise. Furthering this is mandatory no circling or loitering. Thank you.

Lastly, and not addressed, is the total number of air tours after the ATMP is implemented. This is most important since The Act was created because of complaints related to frequency and noise levels of air traffic over HVNP. It is hoped air tour numbers will be set at decreased numbers, but if they continue at the same or greater numbers, complaints will pull staff away from necessary interpretation & amp; protection of HVNP to handle air tour complaints. In the final ATMP please state exactly how and where to address air tour complaints. Also, address what triggers an investigation, by whom, and how the public can follow the issue.

Alternative #2 is most significant because it completely solves air tour problems and does not diminish the special and significant beauty of HVNP.

Again, thank you for this opportunity to comment.

Correspondence ID:	913	Project: 103522 Document:	118739	
Name:	Gantley, Jeri R			
Received:	Apr,01	2022 14:55:01		
Correspondence Type:	Web F	orm		

Correspondence: Our home is in the Village of Volcano where Ohia Trees and Hapu'u ferns sway in the breezes of the rain forest near the Hawai'i Volcanoes National Park. We observe the Apapane, I'iwi, Pueo, and all the native birds take flight from their safe perches when the Armageddon-like chopper noises bellow overhead. It is our kuleana to protect our native species from preventable sources of harm. These birds frantically dive and look for cover, which unfortunately can land them in the path of predators.

The peace and solitude which is Hawai'i Volcanoes National Park is extremely compromised by hours of loud helicopters circling again-and-again overhead. I personally find this an invasion of my peace of mind, ultimately causing great stress and impacting my general spiritual and physical well-being.

I can't help but feel there is an unnecessary risk of danger for pedestrians in the area due to the historically, high number of helicopter crashes. Weather and winds affect air traffic safety and more often than not, these conditions are sketchy in this area. Is it worth the potential loss of life just for that moment in the sky?

Lastly, the noise is unacceptable! I can hardly hear a conversation in my home for the hours these helicopters are hovering overhead. PLEASE stop these tour operators from harassing those of us on the ground in this special place. Mahalo nui loa--Jeri Gantley

Correspondence ID:	914 Project: 103522 Document:	118739
Name:	Ashton, Laura E	
Received:	Apr,01 2022 14:58:34	
Correspondence Type:	Web Form	

Correspondence: Dear Policy Makers,

I haven't stopped hearing helicopters overhead all morning and this is becoming the norm. A tiring, irritating norm that people shouldn't have to endure day in and day out. As soon as one motor above fades away, another soon commences, loudens, then recedes. It agitates me, makes my heart quicken, and makes me sigh in helplessness.

Please understand how draining a chronic noise and constant interruption these overhead invaders create, diminishing the quality of life for all your tax paying citizens living over miles of land below each helicopter's activity. We residents are unable to control this disruptive environment. And if we humans are affected by the noise, think how it also harms our animals, wild and domestic, who are also innocently subjected to the helicopters' audible harassment. Please help minimize or squelch this intrusive, overwhelming, relentless invasion of privacy and decency.

Thank you for your serious consideration and remedying actions. Sincerely, Laura Ashton.

Correspondence ID:	915	Project: 103522 Document:	118739
Name:	Ware, Diane		
Received:	Apr,01	2022 15:18:31	
Correspondence Type:	Web F	orm	

Correspondence: Thank you for this opportunity to once again comment on the ever increasing air tours flying over HVNP and the surrounding communities. I live 1 mile from HVNP and 2 miles from the active Halema'uma'u crater. I experience no respite during the day from circling helicopter tours, often 40 minutes per hour which I have clocked. They fly over my subdivision, circle and then return over my house. Besides not being able to clearly hear or enjoy the native birds such as 'apapane and oma'o living around my house I also increasingly am denied the wilderness experience in the Park. It is dismaying to hike alone or with Sierra Club members on an outing in the Park and hear a constant drone of helicopters as if in a war zone.

The four proposed alternatives now offered are all insufficient to protect the environment, wildlife and people's wilderness experiences. However, we at Sierra Club note that Alternative 2 offers more protection than the others, prohibiting air tours within the ATMP planning area (areas below 5,000 feet AGL and within ½-mile of the Park boundary). I also feel the total number of tours must be greatly reduced or eliminated altogether due to detrimental effects to humans, wildlife and the wilderness experience.

The Sierra Club air tours policy states:

(1) Air tours are flights conducted for sightseeing.

(2) The Sierra Club supports management tools and methods to diminish or eliminate impacts from aircraft tours and landings, including bans of tours and landings wherever and whenever appropriate, on National Monuments and units of the National Park System and the National Wilderness Preservation System.

(3) Agencies should preserve and, where there are impacts, fully restore the natural quiet within protected areas and address this issue in their general management plans.

The Sierra Club supports the establishment of appropriate noise standards and comprehensive baseline soundlevel monitoring and sound-source inventories of all protected areas. This includes continual assessment of noise from all human-generated sources and incorporation of public comments about noise impacts.

Principles of Natural Quiet necessary for a calming wilderness experience:

(1) The sounds and silences of nature are among the intrinsic elements that combine to form the natural environment. Natural sounds amidst intervals of stillness are inherent components of the "scenery and the natural and historic objects and the wildlife" within National Monuments and units of the National Park System and National Wilderness Preservation System.

(2) Natural quiet is the extended opportunity to experience only natural sounds amid periods of deepest silence. The quiet to be preserved or restored is as defined by the National Park Service as "the quiet at the lower end of the ambient sound level range that occurs regularly between wind gusts, animal sounds, etc., not just the average sound level." As the Park Service explains, "Lulls in the wind or interludes between animal

sounds create intervals where the quiet of a sylvan setting is quite striking. In considering natural quiet as a resource, the ability to hear clearly the delicate and quieter intermittent sounds of nature, the ability to experience interludes of extreme quiet for their own sake, and the opportunity to do so for extended periods of time [are] what natural quiet is all about."

At present as I experience at home and in HVNP there is only short periods of natural quiet in this park People are bombarded with urban noises at home and the natural quiet the Park 'could' offer is lacking.

Furthermore I am very concerned about the effects on our native birds in HVNP which encompasses a large area from sea level to over 13,000ft. The air tours criss cross the island spewing noise and fossil fuel emissions. HVNP is home to several endangered birds such as the ' i'iwi which should have critical habitat, as well as the endemic goose nene, akiapolo'au, and 'i'o. Less than 2 miles from the erupting crater is the Keauhou Bird Conservation Center with the critically endangered 'alala and numerous other endangered birds. I live .5 miles from the Center and it's aviaries and am certain they are buzzed daily from air tours. The effects must be monitored and mitigated in an unbiased EA or EIS.

One study of effects on birds authored by Norbert Kempf and Ommo Hüppop, Institute for Ornithological Research, Helgoland Ornithological Station stated:

"Almost all species of bird have to live with the threat of dangerous predators swooping on them out of the sky. The fastest possible escape flight as soon as a predator appears is the only sensible reaction in many cases. In the process, mistakes may also occur, so that birds respond to the sudden approach of animals that are essentially harmless by suddenly flying off.

Airplanes can also prompt birds to take flight, even though the aircraft do not appear as predators. In experiments on birds with different dummies, it was found that escape flight reactions are the natural response to all flying objects. Fear of dummies used many times quickly subsided, but not their attentiveness towards them. Individual features of the flying object, such as shape, size, angular speed etc., are of differing significance as trigger mechanisms. But since wild animals react to enemies according to a complex system, virtually no useful rules can be derived from this for air traffic.

# What kinds of reaction occur?

When an airplane appears, all possible levels of excitation are described in birds, from outwardly non-visible physiological reactions to protection, ducking, increased calling activity, restless pacing back and forth, running away, flying off and returning to the same place or a place close by, flying off and leaving the area, right through to panic-like flight reactions.

In addition, during the breeding period, various predatory species of bird repeatedly carry out pseudo-attacks and also genuine attacks on gliders, hang-gliders and paragliders. Curlews sometimes launch vicious attacks on model aeroplanes that fly over their breeding

grounds, which can also lead to accidents.

Waterfowl which take to the air because of an airplane usually stay in the air for one to three minutes, but sometimes also considerably longer. After this, it takes some time before the birds calm down again and resume their previous activity.

Using modern electronic instruments, it is possible to measure the heart rate of brooding birds. Measurements show that these birds often react to the appearance of airplanes with a marked increase in heart rate, in other words they become nervous, even if no outward reaction is visible. It thus becomes clear that the loss of time immediately associated with taking flight is not the only effect of an airplane on birds which has to be taken into account. A crucial question that needs to be answered is the extent to which effects can be anticipated on individual life expectancy, reproduction rate and ultimately on population size.

• First of all, any reaction leads to changes in energy conversion. In species which fly a lot (e.g. swallows) the energy conversion during flight increases only to three times the base energy conversion, in poor flyers or at high speeds (e.g. in ducks) it sometimes increases to more than 20 times the base figure. In the case of escape and attack flights of e.g. waders of wet meadows, it has to be assumed that the energy consumption corresponds to twelve times the base energy conversion. Even when there is no outwardly visible excitation, the heart rate may show a fifteen-fold increase and energy consumption may at least treble even without physical activity.

• In resting snow geese, it has been found that the time of food intake during the day may be reduced by up to 51 % if they are disturbed. Brent geese which are frightened every 30 minutes by aircraft or people must spend 30 %

more time feeding compared with birds of the same species in less intensely disturbed areas. When the period of daylight and other resources are limited, it is not always possible to compensate for such loss of time."

I request the NPS at a minimum, determine the effects of frequent air tours (16,500 in 2017) on our nene geese that often nest in the park and fly over my subdivision during the day and the endangered birds at the conservation center.

Another area of great concern for humankind is the burden of fossil fuel emissions and particulates from the allowed flights. This is a climate carbon footprint of the Park and a health hazard to humans and wildlife. The NPS prides itself on being "green" and lowering its carbon footprint. I also request the determination of HVNP's carbon footprint with the inclusion of emissions from the air tours plus gas powered vehicles visiting annually.

Mahalo nui for being pono in this determination.

Correspondence ID:	916	Project: 103522 Document:	118739
Name:	KETCH	IAM, JON	
Received:	Apr,012	2022 15:37:34	
Correspondence Type:	Web Fo	orm	

Correspondence: TO WHOM IT MAY CONCERN:CLOSING AIR SPACE AROUND HAWAI WOULD BE A WRONG MOVE FOR THE ISLANDS AIR SERVICE INDUSTY., MY SELF PERSONALY IT WAS THE HI LIGHT OF MY VACATION. PLEASE THINK THIS OVER. THANKS JON

Correspondence ID:	917	Project: 103522 Document:	118739
Name:	Hawk, Aubrey		
Received:	Apr,01	2022 15:50:13	
Correspondence Type:	Web F	orm	

Correspondence: The Volcano Community Association respectfully submits preference for Alternative 2, which would prohibit air tours within the ATMP planning area (areas below 5,000 feet above ground level and within ½-mile of the Park boundary). HVNP is filled with native species and awe-inspiring natural landscape, where visitors should be able to immerse themselves in peace. Alternative 2 will greatly mitigate the now almost constant annoyance of air flight tours, which currently disrupts the experience for thousands of visitors on the ground and degrades quality of life for area residents. Mahalo for this opportunity to give input.

Correspondence ID:	918 Project: 103522 Document: 118739	
Name:	Desai, Neal	
Received:	Apr,01 2022 16:08:20	
Correspondence Type:	Web Form	

Correspondence: To: National Park Service and Federal Aviation Administration Re: Scoping comments for the Hawai'i Volcanoes National Park air tour management plan

We are writing to comment on the alternatives for the Hawai'i Volcanoes National Park air tour management plan. Since 1919, the National Parks Conservation Association (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 nationwide, we ask you to consider our views. We want to express our strong recommendation to adopt Alternative 2 as the preferred alternative in the final air tour management plan.

As the National Parks Air Tour Management Act of 2000 (NPATMA) states, "The objective of any air tour management plan shall be to develop acceptable and effective measures to mitigate or prevent the significant adverse impacts, if any, of commercial air tour operations upon the natural and cultural resources, visitor experiences, and tribal lands." In the section "alternatives considered and dismissed" the brochure states, "The NPS determined the current level of air tours is inconsistent with the Park's purpose and values. The Park's

purpose includes perpetuating the traditional Hawaiian cultural connections to the Park's landscapes (see Foundation Document). Noise from the current level of air tours inhibits the Park's ability to meet this purpose. Noise from air tours negatively impacts existing sacred sites within the Park associated with Native Hawaiian people. The NPS is required to avoid such impacts to sacred sites to the extent possible (NPS Management Policies 2006 5.3.5.3.2). Native Hawaiians have consistently noted that persistent air tours over the Park unreasonably interfere with Native Hawaiian connections to the Park's sacred areas." We believe NPS has the authority and duty under NPATMA to decide when air tours are adversely impacting natural and cultural resources, visitor experience and tribal lands and therefore, must recommend no air tours in and around the park.

We appreciate the acknowledgement of 1) the park's purpose to perpetuate endemic Hawaiian ecosystems as well as 2) the requirements under the Wilderness Act. The discussion on helicopter noise studies is critical to understanding the disruptive, damaging effects noise can have on wildlife, ecosystems, and visitors who are trying to enjoy natural sounds found in designated wilderness areas. Hawai'i Volcanoes should ensure that it utilizes and incorporates acoustical monitoring data as the agencies develop the air tour management plan in order to judge the impairment of natural sounds in wilderness.

NPCA strongly recommends the agencies conduct thorough outreach to Native Hawaiian communities and individuals as well as the general public. Hawai'i Volcanoes is a sacred place where solemnity and immersion are cherished as values in the park. It is also a place of reverence and awe for Americans who have once-in-a-lifetime opportunities to visit and enjoy. This scoping comment period is being conducted in a short 30-day period. We urge the agencies to develop an outreach plan that is more inclusive and proactively seeks the views of Native Hawaiians and the public rather than expecting people to anticipate and react to another short comment period.

Correspondence ID:	919 Project: 103522 Document: 118739
Name:	Brumbaugh, Cory R
Received:	Apr,01 2022 16:44:01
Correspondence Type:	Web Form

Correspondence: Air tours allow the general public to access the park in a way that leaves zero environmental footprint. Also, with the enormous scale of Halema'uma'u, air tours are the only way people can even see just how big it is. Please do not pass this. Hundreds of local families and business will be affected by this bill

Correspondence ID:	920 Project: 103522 Document: 118739
Name:	Livingston, Ilima
Received:	Apr,01 2022 16:56:57
Correspondence Type:	Web Form

Correspondence: Air tours provide a unique way to see our natural resources. Being a Native Hawaiian born and raised in Hawai'i it is important to protect our environment. I feel viewing the island by air is a non-invasive way to see the beauty Hawai'i has to offer. With so many tourist traversing our land, flying allows thousands to achieve this with limited impact on the ground. I have flown with Paradise Helicopters and had an amazing experience seeing the Island of Hawai'i with a minimum footprint. It would truly be devastating to limit the airspace above Volcano National Park. Similar to Waipi'o Valley, Volcano National Park will be inundated with thousand more visitors on the ground leaving the park vulnerable to long term devastation.

Correspondence ID:	921 Project: 103522 Document: 118739
Name:	, Veronica
Received:	Apr,01 2022 16:59:29
Correspondence Type:	Web Form

Correspondence: Helicopters tours help people to see the park, especially if they aren't able to travel to Hilo, have trouble walking, or simply want to view the splendor of a volcano from an aerial perspective. It would be tragic to remove the ability for tours to take place over the park. Restrictions are fine, but do so responsibly. I see

no reason for tours to be stopped. It seems like an overly restrictive measure proposed by people who feel like they little control over their own lives.

Correspondence ID:	922 Project: 103522 Document: 118739
Name:	Ehn, Amy
Received:	Apr,01 2022 17:26:31
Correspondence Type:	Web Form

Correspondence: As an employee of an air service provider, I thank you for this opportunity to comment. Please consider the grave impact this will have on Hawaii's air-tour operators in the HVNP ATMP. The ripples from this ATMP will undoubtedly impact our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated. There was not enough time to sensibly evaluate all of the details involved in this highly charged conversation. If nothing else, we need to table this discussion for further review prior to moving forward with any restrictive action.

Correspondence ID:	923	Project: 103522 Document:	118739
Name:	Grimes, Karly		
Received:	Apr,01	2022 18:09:12	
Correspondence Type:	Web F	orm	

Correspondence: I don't think there should be a restriction on helicopter tours in the park or anywhere on our island - We can use the tours to help educate our visitors not only about the island but the culture as well. We utilize helicopters to fight our fires and rescue people in need I feel it unfair to our visitors and the pilots to restrict flying in areas.

Correspondence ID:	924	Project: 103522 Document:	118739
Name:	Minor, Andrea J		
Received:	Apr,01 2022 18:35:29		
Correspondence Type:	Web F	form	

Correspondence: Aloha, I would like to comment that Alternative 2 should be implemented, with Alternative 3 as a likely alternative to appease the tour companies. (Seriously, they pay \$25 for a permit for the day?). I can't say my comments are substantive, in that I can't argue your visitor numbers or flights/day, or provide new data on endangered species or cultural resources. But I can provide a qualitative assessment of a recent day trip.

I visited the art gallery, but decided to walk out along the Steambanks trail to the old Jagger facility, less crowded, to check out the latest eruption. I took a quick video of a view along the rim to share on Facebook, and I couldn't begin to capture a couple hours spent along the rim. I was going to write a narrative to accompany it, and it begs descriptions from all 5 senses, never mind the spiritual ones for those who have a cultural link to this park. I won't entertain you with details of ohia blossoms and the mist, but you get the idea - until you look up for a view of the Iwa and there's a helicopter, or you tune in to the native birds - oh wait there's a helicopter.

HAVO is a special place, from Mauna Loa views down to the ocean. Not everyone can spend hours enjoying all its sites and views, but even an hour along the rim is a good experience. An air tour can certainly get a nice view from the edges, narrated. Not everyone can afford an air tour, in fact it's an experience that is high end, not to call it "elitist". But those that prefer to view the park and experience it from the ground, we have a right to enjoy it without the current levels of aircraft.

Mahalo for the opportunity to comment. Do the right thing.

Correspondence ID:	925	Project: 103522 Document:	118739
Name:	Taomi	a, Victoria	
Received:	Apr,01	2022 18:42:49	

Correspondence Type:

#### Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

Air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	926	Project: 103522 Document:	118739
Name:	, Leena	1	
Received:	Apr,01 2022 18:55:37		
Correspondence Type:	Web F	orm	

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for (HVNP). Air tours are extremely important to our economy. Tourism is the main source of income for Hawaii. Hawaii airspaces are already so heavily regulated, to continue to 'regulate' it more could hurt not only small businesses involved with tourism but tourism in general. Being able to see all of Hawaii from the air allows people to visually see Hawaii in all of it's beauty along with learning and appreciating the culture. More restrictions also mean less tours which I stated earlier leads to hurting small family owned flight businesses which then leads to unemployment amongst a number of people in a place with such a high living cost. Restrictions help further the displacement of local and hawaiian/pacific islanders who have lived here for generations. Restrictions cause a major ripple effect that eventually is only felt by locals who are already struggling to stay in their ancestral homelands.

Correspondence ID:	927	Project: 103522 Document:	118739
Name:	, Aisha		
Received:	Apr,01	2022 18:56:51	
Correspondence Type:	Web Fo	orm	

Correspondence: Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. Leaving the quality of our land in tact and yet enjoyable from the sky! leaves little to no environmental footprint or disturbance, unlike ground-based vehicles. Born and Raised on the big island ive seen so many ground tours company's take our visitors to dangerous places or sacred places they shouldn't be. Helicopter tours are a perfect way to venture the island with a birds eye view for them to look and not touch ,destroy, or be in danger.

Correspondence ID:	928	Project: 103522 Document:	118739
Name:	Ravarra	a, Patricia	
Received:	Apr,01	2022 19:02:21	
Correspondence Type:	Web Fo	orm	

Correspondence: To the Planning Team:

I am a resident of the Island of Hawai'i, and I am writing in response to the Federal Aviation Administration and the National Park Services invitation to the public to provide input on the potential alternatives for the Hawai'i Volcanoes National Park Air Tour Management Plan Environmental Assessment.

I am writing in conditional support of Alternative 3, which appears to promote reductions in the number of flights as well as limitations on frequency and routing as it regards Hawai'i Volcanoes National Park. My personal preference would be to incorporate elements from both Alternative 3 and Alternative 4, but there does not appear to be an option for such a choice. I will, however, include those elements of Alternative 4 where appropriate in my comments below.

The elements of the alternatives I consider to be most important: (1) prohibition of air tours within the Air Tour Management Plan (ATMP) planning area; (2) prohibition of commercial air tours under 5,000 feet; (3) limitation of daily/annual flights to and around the Park; (4) designation of specific routes to/from the Park; and (5) establishment of specific times for commercial tours to take place. As a resident who lives in the vicinity of another popular helicopter tour site, I am in deep sympathy with residents who must endure the onslaught of aural pollution caused by these aircraft, and am encouraged that there are finally steps being taken to protect the integrity of the Park and its environs.

I would ask that the planning team take compromise into consideration during their analysis. By "compromise," I specifically mean the willingness to merge elements from the Alternatives presented when the comments from residents promote this possibility. For example, in review of the proposed Annual/Daily Number of Flights, I would have liked to have seen the "Daily caps will be considered" option from Alternative 4 also be included for Alternative 3. Why not?

In my humble but experienced opinion, I suggest that the planning team should also seriously consider the residents of the areas surrounding the Park when analyzing the alternatives, and work to ensure that the final decision of the team reflect the experiences of those people as having a greater priority than those of the transient visitors to the Park. I hope that this comment doesn't require further explanation and is substantive as it stands.

Additionally, it may not be within the scope of this planning team to look outside of the Park and its immediate environs, but if I may, I will suggest that the team take this opportunity to advocate on behalf of all of the residents of Hawai'i Island whose lives are impacted by the commercial air touring industry. The goodwill generated by doing so would be immeasurable.

It is also my firm hope that the planning team has taken this opportunity to meet with local community groups who have been instrumental in getting the Park Service to this point of action. As I mentioned earlier, I live in the vicinity of a location outside of the Park that is also heavily trafficked by helicopters, and the violations of the HI Manual altitude restrictions are innumerable. Hearing firsthand from residents who have been subject to these (ongoing) violations should be extremely helpful to the planning team for a better understanding of the absolute necessity of a strict plan, and realistic ways to manage it.

Mahalo for the opportunity to participate in this process.

Correspondence ID:	929 Project: 103522 Document: 118739
Name:	Ferreira, Kamakana C
Received:	Apr,01 2022 19:08:25
Correspondence Type:	Web Form

Correspondence: Aloha:

The Office of Hawaiian Affairs (OHA) is in receipt of your February 2022 newsletter inviting us to comment on the proposed alternatives for the Hawai'i Volcanoes National Park (HAVO) Air Tour Management Plan (ATMP). The Federal Aviation Administration (FAA) is preparing this ATMP in cooperation with the National Park Service (NPS). The ATMP will apply to commercial air tours flown at or below 5,000 feet above ground and within a half mile of the park boundaries. The newsletter further indicates that ATMPs are subject to environmental review, and that any comments provided at this time in regards to the alternatives would be used to inform and refine the draft environmental assessment as part of the public scoping process. A preferred alternative has not yet been selected.

The newsletter first presents Alternative 1 as a no action alternative. Under this alternative, commercial flights would still continue under a FAA Interim Operating Authority with no flight path restrictions or limits to altitude or agreement with HAVO. Notably, the National Parks Air Tour Management Act was created to enable the development of ATMPs between the FAA and NPS so that controls over air tours, such as routes, altitudes, time of day restrictions, and/or maximum number of flights for a given period could be established. Aside from the no action alternative, three other alternatives are provided in the newsletter: 1) Alternative 2 - prohibits air tours within the ATMP planning area (up to 5,000 ft) to maximize park resource protection; 2) Alternative 3 - two main flight routes (coastal and northern route) with set flight times between 10AM and 2PM for non-quiet tech flights and 10AM to 4PM for quiet tech flights; and, 3) Alternative 4 - three main flight routes (Kahuku, Coastal, Pu'u 'ō'ō) with set flight times between 9AM to 5PM for non-quiet tech flights.

Previously, OHA participated in National Historic Preservation Act Section 106 consultations for the ATMP and did submit formal comments on January 5, 2022. As should be apparent, many park visitors, Native Hawaiian beneficiaries, and the Kupuna Council (cultural advisors to HAVO) consistently advocated against commercial air tours due to adverse effects caused by low flying commercial flights on the use and serenity of the vast cultural landscape present within HAVO boundaries. Further, the Kupuna Council believes that Kīlauea is sacred and has requested a no-fly zone for decades. OHA maintains that a traditional cultural property study be done and appropriate vertical buffers be established given the abundance of cultural concerns presented.

While the set of alternatives provided in the newsletter does not create an absolute no-fly zone, OHA does acknowledge that Alternative 2 does in fact restrict all commercial air operators within the airspace under the ATMP's jurisdiction. As such, OHA believes Alternative 2 should be the preferred option at this time. Beyond the current environmental review process, OHA is aware that members of the Kupuna Council intend to reach out to the Hawai'i Congressional delegation to work towards establishing a no-fly zone up to at least 9,000 feet. As such, OHA will maintain contact with the Kupuna Council and offer support where we can.

OHA does acknowledge that Alternatives 3 and 4 will still be retained as part of the environmental assessment for analysis purposes. To improve these options, OHA recommends that Alternatives 3 and 4 further add no fly days on Sundays, mandatory interpretive training requirements for pilots, restricting flights during cultural events (with mandatory standoff distance), daily caps on flights, and explicit noise thresholds and monitoring methods for quiet technology flights. Further, our comments provided during the NHPA Section 106 process should be integrated into the environmental assessment as well. As presented in our January 5 letter, OHA maintains that improved flight monitoring methods, cue-based pilot training, and stricter aircraft maintenance requirements must be adopted within the ATMP.

Mahalo for the opportunity to comment. OHA looks forward to continuing consultation and reviewing the forthcoming draft environmental assessment. Should you have any questions, please contact OHA's Lead Compliance Specialist, Kamakana C. Ferreira at (808) 594-0227 or by email at kamakanaf@oha.org.

Name:	Pearson, Mike		
Received:	Apr,01 2022 19:51:00		
Correspondence Type:	Web Form		

Correspondence: As a very frequent hiker and explorer of HAVO I will concur with the park's alternative # 2 objective. I find the air tour operations to be disruptive to the sanctity of the wilderness.

If I may, I would question the 1/2 mile boundary for the ATMP as insufficient distance to mitigate disruption from approaching aircraft. At the very least one nautical mile would be more appropriate at aircraft speeds to attain the minimum 5000' AGL.

Correspondence ID:	931 Project: 103522 Document: 118739		
Name:	Lupkey, Steven W		
Received:	Apr,01 2022 20:44:26		
Correspondence Type:	Web Form		

Correspondence: Big Island Air has been flying air tours and charters here in Hawaii since 1985. We provide an alternative way for tourist from around the world to experience the majesty of the Kilauea Volcano. Air tours are the mainstay of our business. The one thing that visitors want to see most is volcanic activity. Many times over the years lava has only been visible from the air. We provide a safe, informative, and historical tour of our island and all of its wonders.

Our company is a small, Family/Veteran owned business. Air tours represent approximately 95 percent of the flights that we make each year. The authority to operate within HVNP is what our company was built around. We follow the lava. It is not always flowing inside the park but when it is we need to be able to view it safely from the air. Further limiting or taking away our ability to fly within the park will most likely mean the end for us, our employee's and our families.

The current proposals for the HVNP ATMP will greatly limit our ability to safely conduct air tours as we have done for the past 37 years. Pilots need to have flexibility in making decisions when it comes to safety of flight. The weather here on the island is constantly changing. Restricting pilots route of flight in such a diverse climate is a recipe for disaster. Restricting the hours of operation is another unrealistic regulation because of the unique conditions we have on the island. The only workable option for us at this time is "Alternative One".

The environmental footprint from our aircraft flying at 1500 feet AGL or higher over the park is minimal. The noise from our small aircraft is insignificant especially when compared to the thundering pipes of motorcycles or other vehicles driving through the park on a regular basis.

The National Park Service and the FAA have been working on the ATMP since the year 2000. Now because of a lacking of planning and foresight this plan is being rushed through allowing only a 30 day comment period. Surely something so important that affects so many lives is deserving of more time and consideration.

We appreciate this opportunity to comment. We hope that you will consider air tour operators and all those that will be affected by the implementation of the ATMP at HVNP.

Steven W. Lupkey President Big Island Air

Correspondence ID:	932 Project: 103522 Document: 118739
Name:	Mendonca, Karl R
Received:	Apr,01 2022 20:47:08
Correspondence Type:	Web Form

Correspondence: The National Park Service needs to demonstrate a clear "Purpose and Need" for helicopter tourism consistent with the Park's stated clear mission of "preserve unimpaired the natural and cultural values of the national park system for the enjoyment, education and inspiration for this and future generations."

Helicopter tourism is the source greatest environmental and cultural impact on Hawaii Volcanoes National Park than any other activity.

Contributing to the greatest air and noise pollution, greatest unacceptable disturbance to wildlife, cultural values and visitors enjoyment of the Park.

Helicopter tourism is not compatible with National Parks and Wilderness. The natural, cultural and social affects from helicopter tourism should be dedicated to other public and private lands where the natural environment is not valued.

Air Quality should be thoroughly analyzed. The carbon foot print of a helicopter far exceeds any other activity in the Park. Not only analyze the excessive amount of air pollution but the delivery of that air pollution to secluded and in spoiled areas of the Park inaccessible to pollution from internal combustion engines. Also the unacceptable carbon footprint per visitor on a helicopter trip - far in excess that should be tolerated in a National Park.

Noise Pollution should be thoroughly analyzed. Helicopter tourism is the greatest contributor to noise pollution in a National Park. The noise pollution from helicopter tourism adversely affects every living person and wildlife in the Park. The excessive noise pollution by itself is not consistent with the Nation Park's Mission and should be the first of many reasons helicopter tourism should be excluded from the Park. Analyzed the loudness, duration and repetitive affects of noise pollution within the Park. Also analyze the delivery of that unacceptable noise pollution to secluded and popular view sites within the Park - noise pollution impacts to both secluded and popular view areas are unacceptable and distract from the natural beauty and appreciation of the Park's natural environment.

Safety - Analyze to the threat to safety from Helicopter tourism - passengers and visitors on ground, wildlife. The Park Service does not let its employees fly in helicopters without Park boundaries unless it is absolutely necessary for safety of employees and the adverse impacts to Park resources. Why would the Park Service condone joy riding on a Helicopter within the Park multiple time a day every day. Absolute disregard for the natural and cultural resources for the Park Service to allow this adverse impact to occur.

Indirect Impacts are large and should be analyzed and fully presented. In fact the Indirect Impacts many far excess Direct Impacts. The Helicopters do not magically appear at the Park's Boundary, the helicopters traverse over many residential areas, towns, communities, natural areas, schools, hospitals etc. The same unacceptable adverse impacts within the Park are directed suffering 1,000 of people everyday because of Park helicopter tours. Volcanoes National Park is abused by Tourist Helicopters more than any other Park by far. Because the Park Service allows this abuse many of the residents left to suffer the same abuse. The number 1 helicopter tour on the Big Island is Volcanoes National Park. The use the volcano tour to bundle other tours like waterfalls, Waipio Valley and the coastline thus multiplying the adverse impact all over the island. Indirect Impacts must be thoroughly analyzed and prominently presented in the overall analysis.

Environment Justices must be thoroughly analyzed. This is the classroom example of affluent benefactors exacting their enjoyment at the expense and directly impacting those of lower income and minorities. Helicopter tourism clientele are the top 10% of the income bracket. They book helicopter tours which direct their adverse impact on those residents that are less affluent. Those less affluent residents suffer because they don't have the financial ability to address and challenge larger Helicopter Industry who financially influence political representatives. The clientele of helicopter tours are not representative of the minority population they Target their adverse impacts at. Bottom line - wealthy white and Asians targeting adverse impacts on poorer local minorities. You don't see helicopter tours traversing wealthy communities in American. Environmental Justice must be thoroughly analyzed and prominently presented on the analysis.

Climate Change must be thoroughly analyzed. There are very few activities that have a larger carbon footprint per person than a helicopter tour. Totally unacceptable for a National Park should suffer such nonessential impact. Also it is not appropriate to accept carbon offsets for air pollution impacts in a National Park. Many Helicopter companies advertise carbon off set programs like planting trees. First Rule in carbon off set program - you don't pollute your beautiful Nation Park to go plant trees in somewhere less environmentally sensitive. Helicopter

tourism makes up approximately 4% of the visitors but accounts for majority of the carbon pollution for the Park. This makes no sense in the unacceptable impact verse the benefit of insignificant affluent minority.

Americans with Disabilities Act - ADA must be accurately address in this analysis. The Park has done and excellent effort to make the Park assessable for the physically challenged. Helicopter tourism does little to nothing to benefit ADA requirements. A negligible number of clientele for Helicopter Tours are not designed as "Physically Disable". Again the clientele for helicopter tours are affluent and physically able. If helicopter tour industry wants to dispute that, then they can be limited to 50% of their clientele being officially designated "physically Disable" before a helicopter tour crosses over the Park Boundary. There is no measurable benefit Helicopter Tours provide handicap assess ability. The industry must present hard evidence from their past manifest that passengers were physically disable before any quantifiable statement of benefit can be made.

Data for the analysis - Fair Warning do not accept data and information provide by the Helicopter Tourism Industry of FAA at face valve. You must do your due diligence to validate information and data used in the analysis. My experience as well as other residents has been less that truthful and honest when dealing with the helicopter tourism industry and FAA. That includes information on noise, pollution, accidents and unsafe practices, also flight paths, elevations etc. The Park Service will be held accountable during review of the draft of not doing your due diligence regarding verification of data and information. Failure to do so with jeopardize the integrity of the document and analysis and break the trust of the Public you serve.

I DO NOT SUPPORT helicopter tourism in Hawaii Volcanoes National Park. The natural, cultural and social impact to the Park are unacceptable and not consistent with the primary National Park Mission.

Correspondence ID:	933	Project: 103522 Document:	118739
Name:	,		
Received:	Apr,01 2022 20:54:49		
Correspondence Type:	Web F	orm	

Correspondence: National Parks are sacred places that belong to all of us. No one group has greater ownership. The parks offer calm and peaceful enjoyment of our shared resources. They are open to everyone.

Hawai'i Volcanoes National Park is such a favorite of ours. We want to see ALTERNATIVE TWO chosen for the ATMP plan because it protects the park, the people visiting, the cultural sites, the flora and fauna and all living creatures.

When are the rights of one group (tourists with means) greater than the rights and good of the whole? Hawaiian culture is focused on the collective. By honoring the whole, we honor not only the first caretakers of this land but the many generations who will follow after us.

Helicopter tours are unnecessary in the park. They bring excessive noise and pollution. They trample the tranquility of the entire environment. In this age of increasing noise pollution, our can park can be a respite that offers the quietude and the silence that feed our souls.

It's time to restore us. It's time to restore the peace in the park. Don't let the lessons of 2020 be in vain. Please choose ALTERNATIVE TWO.

Mahalo nui loa.

Correspondence ID:	934 Project: 103522 Document: 118739		
Name:	Ke, Paulette K		
Received:	Apr,01 2022 21:18:02		
Correspondence Type:	Web Form		
Correspondence: Aloha Mai,			

My name is Paulette Kaihilani Ke, with the Kupuna Council. I'm a retired teacher currently working as a Kupuna at Volcano School of Arts and Sciences, elementary section. I have but one extremely important comment:

The additional route that's being considered is a flight path following along Highway 11. The noise level would be considerably loud.
This will be detrimental especially for our school because it's very close to the highway. The noise could
complicate educating our
students. When students are outdoors during recesses and PE, hearing directions and safety awarenesses would
become a safety
hurdle. Fire drills would be difficult to complete safely. There's a lot of vehicle traffic especially in the mornings and after school lets
out could complicate things even more. The noise level would only make educating the youths of Hawaii impossible.
Also the animals that live in the area is at risk too. While we still have these beautiful birds freely living on this Aina is a beautiful

sight for our Keiki's to experience and live with. We have Io's/Hawaiian Hawks that grace our campus. Please help us to Malama

all this and more.

Mahalo nui for this opportunity, Paulette K. Ke

Correspondence ID:	935 Project: 103522 Document: 118739		
Name:	Ke, Paulette K		
Received:	Apr,01 2022 21:18:03		
Correspondence Type:	Web Form		

Correspondence: Aloha Mai,

My name is Paulette Kaihilani Ke, with the Kupuna Council. I'm a retired teacher currently working as a Kupuna at Volcano School of Arts and Sciences, elementary section. I have but one extremely important comment:

The additional route that's being considered is a flight path following along Highway 11. The noise level would be considerably loud.

This will be detrimental especially for our school because it's very close to the highway. The noise could complicate educating our

students. When students are outdoors during recesses and PE, hearing directions and safety awarenesses would become a safety

hurdle. Fire drills would be difficult to complete safely. There's a lot of vehicle traffic especially in the mornings and after school lets

out could complicate things even more. The noise level would only make educating the youths of Hawaii impossible.

Also the animals that live in the area is at risk too. While we still have these beautiful birds freely living on this Aina is a beautiful

sight for our Keiki's to experience and live with. We have Io's/Hawaiian Hawks that grace our campus. Please help us to Malama

all this and more.

Mahalo nui for this opportunity, Paulette K. Ke

Correspondence ID:	936	Project: 103522 Document:	118739
Name:	Ke, Pau	ılette K	
Received:	Apr,01	2022 21:20:55	
Correspondence Type:	Web Fo	orm	
Correspondence: Aloha Mai,			

My name is Paulette Kaihilani Ke, with the Kupuna Council. I'm a retired teacher currently working as a Kupuna at Volcano School of Arts and Sciences, elementary section. I have but one extremely important comment:

The additional route that's being considered is a flight path following along Highway 11. The noise level would be considerably loud.

This will be detrimental especially for our school because it's very close to the highway. The noise could complicate educating our

students. When students are outdoors during recesses and PE, hearing directions and safety awarenesses would become a safety

hurdle. Fire drills would be difficult to complete safely. There's a lot of vehicle traffic especially in the mornings and after school lets

out could complicate things even more. The noise level would only make educating the youths of Hawaii impossible.

Also the animals that live in the area is at risk too. While we still have these beautiful birds freely living on this Aina is a beautiful

sight for our Keiki's to experience and live with. We have Io's/Hawaiian Hawks that grace our campus. Please help us to Malama

all this and more.

Mahalo nui for this opportunity, Paulette K. Ke

Correspondence ID:	937	Project: 103522 Document:	118739
Name:	Carse, John		
Received:	Apr,01 2022 21:21:02		
Correspondence Type:	Web F	orm	

Correspondence: Aloha,

I feel the most important element of these alternatives is that they have been presented as a draft Environmental Assessment instead of a complete Environmental Impact Statement. According to a 17-year-old press release "information obtained from public testimony and other sources, including discussions with Native Hawaiian groups, prompted the (Federal Aviation Administration and the National Park Service) to pursue an environmental impact statement" for the Hawai`i Volcanoes National Park Air Tour Management Plan. Why has the HVNP ATMP now been downgraded to just an EA? Additionally, the NPS National Environmental Protection Act Handbook allows for exemptions to an EIS only if the proposed action causes "only minimal environmental impacts" (NPS Cat. Ex 3.3a1). If some of the alternates discussed in this plan are adopted there could be 11,376 unmonitored air tours strafing the HVNP and Big Island neighborhoods at 1500 feet on clear days and at whatever height pilots feel safe at in inclement weather. And this pollution will continue to disturb park visitors, wildlife, and residents for untold future generations. How could this situation possibly be considered as having "a minimal impact?" Certainly an entire EIS is necessary before any plan is implemented. Also, would getting just an EA fulfill the mandate set by the U.S. District Court of Appeals for the District of Columbia?

Another thing the planning team should consider is that the pollution caused by air tours the NPS is profiting from extends not just to a half-mile beyond the park boundary, but all the way back to the airfields where these operations are based. 40 C.F.R. Section 1508.8 requires government programs to address the indirect effects of any actions. Why isn't this document addressing the damage done to the homes and businesses effected by these Park Superintendent-sanctioned air tours as NEPA requires?

A very important element that should be considered that has not already been analyzed is the monitoring of aircraft within the park. When the National Parks Air Tour Management Act of 2000 was five years old, the U.S. Congress asked the Government Accountability Office to determine why it still wasn't implemented. One of the primary findings was that the "FAA and the Park Service lack a mechanism to verify the number of air tours conducted over national park units, both historically and under interim operating authority." What this was referring to was that there was no way to verify the data submitted by operators was accurate and that preliminary

investigations proved operators were often dishonest. Additionally, in March of 2006 the GAO pointed out they found that HVNP had just lost \$2.7 million in a 17-month period as a result of a lack of oversight. An aircraft monitoring system would certainly pay for itself just by discouraging the cheating currently going on in park airspace.

Further, NPS personnel participated in the recent Hawaii Aviation Noise and Safety Tasks Force meetings with other government agencies and air tour operators where it was pointed out that many areas of HVNP are not covered by the FAA's recently installed ADS-B tracking system. Crashes in those areas currently go undetected, endangering the lives of any possible survivors as well as emergency responders who will eventually have to go out and search for the wreckage, often in deplorable weather conditions. An adequate monitoring system would not just ensure compliance with regulations, but would very likely save lives. Why was the GAO's recommendation that the NPS install a robust monitoring program as an integral part of any ATMP ignored in these alternatives?

I'm also concerned about the sections concerning Quiet Technology Incentives of this plan. Does "convert to quiet technology aircraft" include upgrading the muffling devices on the aircraft currently being used, or does it only apply to new aircraft employed by the operators? And how much quieter do the aircraft have to be? Since the improvement of only a few decibels would be indistinguishable to wildlife and visitors, has the required improvement been quantified? And if so, is there a specific decibel reduction that these noisy operators will have to achieve before being allowed to be even more of a nuisance? And are these arbitrary specifications defensible if they should be legally challenged? Also, is there any reason that the right to continue to fly in a nation park couldn't be incentive enough for operators? Why not just require all air tour operators to convert to quiet technology aircraft with two years or be denied the use of park airspace?

Another concern is that this document implies that only the FAA personnel have the authority to enforce air tour regulations. The statement that " The FAA has authority for all airspace matters..." is just plain ludicrous -- does the FAA really control the airspace in your daughter's bedroom? -- and has repeatedly been dismissed in federal courts. Even current U.S. Supreme Court Chief Justice John Roberts has ruled that lowly local municipalities can enforce rules against noisy aircraft [City of Naples Airport Authority v. F.A.A. (409 F 3d 341)]. Would you please correct the portion of this document that infers that NPS officials are not legally allowed to enforce any aspect of the ATMP?

It's been well over two decades since Congress ordered our national park administrators to rein in the horrendous air tour nuisance problem. Won't you please do something soon?

Sincerely, John Carse

Correspondence ID:	938	Project: 103522 Document:	118739
Name:	,		
Received:	Apr,01	2022 21:38:32	
Correspondence Type:	Web F	orm	

Correspondence: The Air Tour Act requires "(3) Contents.-An air tour management plan for a national park- (D) shall include incentives (such as preferred commercial air tour routes and altitudes, relief from caps and curfews) for the adoption of quiet aircraft technology by commercial air tour operators conducting commercial air tour operators over a national park"

ONLY alternatives 3 and 4 provide quiet technology incentives.

Correspondence ID:	939 Project: 103522 Document: 118739	
Name:	Pearson, Jacob	
Received:	Apr,01 2022 21:41:59	
Correspondence Type:	Web Form	
Correspondence: Aloha,		

I come to you as a Helicopter Pilot who is primarily based in Oahu but has flow on the Big Island for several years. Many people have lost their jobs with the pandemic. Pilots, mechanics, reservations, ground crew. They have had to uproot, move to other islands, move off island or whatever means necessary to live a sustainable and fulfilling life here in Hawaii.

If the National Parks Services limits routes, number of flights, altitudes over the parks there is no question more people will lose their jobs(Hundreds). It means there will be even more cancelations due to weather. Helicopter companies rely on steady inflow of people to help support all employees within. Not to mention all the booking agencies or hotels. Every single Pilot I know has nothing but respect for the land that we fly over and do our best to introduce/teach people what it is exactly we are seeing. That includes all the different micro climates, the conservation work being to to protect the watershed, getting rid of the invasive plants/animals/insects.

Helicopters are used to support different conservation groups throughout all the islands. Most of these companies also do tours. And rely on that revenue to help support the company and employees involved. Doing conservation work/utility alone does not always keep a company running.

Yes, helicopters are loud, but only if your are right up next to them. Up at altitude it has been proven they are not much more loud than a normal conversation. We don't fly when the sun goes down, try not to take off too early. Fly routes that will create as little impact on the population as possible. We do everything we can to mitigate disturbances for the community.

However, weather here changes quickly, and it is very important pilots have options to stay clear of harms way. I have flown many people with mobility issues and there is nothing more special then to show people what this island has to offer and in most cases is a once in a life time opportunity.

Please I urge you to reach out and work with these companies to find a better solution. We are all willing to listen to the different sides of the story but there are so many people's lively hoods at stake. This feels rushed, given only one month to leave comment. There should be greater debate on this topic.

Mahalo, Jacob

Correspondence ID:	940	Project: 103522 Document:	118739
Name:	Dugan,	Dan	
Received:	Apr,01	2022 21:50:28	
Correspondence Type:	Web Fo	orm	

Correspondence: The mission of the NPS includes the preservation of " the natural soundscapes" that are " inherent components of 'the scenery and the natural and historic objects and the wild life' protected by the NPS Organic Act." (Director's Order #47). Overflight of a national park at any altitude should be forbidden. The only exceptions should be for emergencies, and those parks whose interpretation includes aviation; for example, air shows at Crissy Field in the GGNRA. We ask the NPS to make this regulation, and the FAA to enforce it. [Signed] The Officers and Directors of the Nature Sounds Society

Correspondence ID:	941	Project: 103522 Document:	118739
Name:	,		
Received:	Apr,01	2022 22:14:53	
Correspondence Type:	Web Fo	orm	
Correspondence: Let the helicopters fly!!			
Correspondence ID:	942	Project: 103522 Document:	118739
Name:	Bennett, ReBecca		
Received:	Apr,01	2022 22:22:41	

Correspondence Type:

#### Web Form

Correspondence: I am concerned about the ATMP alternatives proposed by the National Park Service for Hawaii Volcanoes National Park (HVNP). Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country.

These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces.

Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

Air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight, these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy, and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	943 Project: 103522 Document: 118739
Name:	Cody, Chris
Received:	Apr,01 2022 22:23:29
Correspondence Type:	Web Form

Correspondence: The National Trust for Historic Preservation (the "National Trust") appreciates this opportunity to comment on the Hawaii Volcanoes National Park Air Tour Management Plan pursuant to Section 106 of the National Historic Preservation Act ("NHPA") and 36 C.F.R. §§ 800.2(c)(5) and 800.3(f)(3). We support the adoption of Alternative Two as presented in the February 2022 Newsletter, which would prohibit all air tours within the scope of this undertaking. During the ongoing Section 106 consultation meetings we have consistently heard strenuous objections from Native Hawaiian organizations, individuals and advocacy groups to the continued operation of air tours within Hawaii Volcanoes National Park due to their substantial adverse effects on both cultural resources and traditional cultural practices. The National Trust shares those concerns and asks the National Park Service ("NPS") and Federal Aviation Administration ("FAA") to respect the sacred nature of this important cultural site by implementing Alternative Two and establishing the maximum possible protections.

The scope of this undertaking is limited by the National Parks Air Tour Management Act of 2000 to include only airspace within a half-mile of national park boundaries and elevations below 5,000 feet. Nonetheless, we believe that the FAA has a responsibility to holistically evaluate adverse impacts caused to historic resources by the permitting of flights even beyond those boundaries. The adoption of any of the proposed alternatives and resulting change in existing flight patterns should be independently evaluated for additional direct, indirect, and cumulative impacts to Hawaii Volcanoes National Park. 36 C.F.R. § 800.5. The National Trust urges the NPS and FAA to adopt Alternative Two for this undertaking and to take further action to protect the cultural resources and traditional cultural practices within Hawaii Volcanoes National Park.

Correspondence ID:	944	Project: 103522 Document:	118739
Name:	,		
Received:	Apr,01	2022 22:48:49	
Correspondence Type:	Web F	orm	

Correspondence: Aloha,

I think that tour helicopter flights within the Hawai'i Volcanoes National Park are essential for tourism in Hawaii and for teaching visitors and locals about this stunning island that we call home. I am a frequent visitor of HAVO and have never been disturbed by tour helicopters flying overhead. I love the thought of sharing the beauty of Mauna Loa and Kilauea with as many people as possible. People are so inspired by active volcanoes, especially those in Hawaii, and I don't agree with limiting aerial access for visitors.

Mahalo for your consideration!

Correspondence ID:	945 Project: 103522 Document: 118739
Name:	Ley, Diane L
Received:	Apr,01 2022 23:21:26
Correspondence Type:	Web Form

Correspondence: Thank you for the opportunity to provide comments on the draft Air Tour Management Plan (ATMP) for Hawaii Volcanoes National Park (HVNP). For nearly 50 years, I have been a resident of the adjacent community to HVNP and frequent the parks trails and resources.

• Alternative 1 is not acceptable as it would continue to permit air tour operations to generate unacceptable noise impacts on the Park's natural and cultural resources, character of the wilderness and the ground-based park users' enjoyment and serenity. For more specific impacted resources see details highlighted on pages 7-8 of the HAVO Newsletter dated 2.11.2022.

o Air tour operations are provided for the purposes of visitor and residential sightseeing, e.g. the act of seeing a place for purposes of enjoyment and entertainment at the expense of a degraded environment and degraded experience of others due to extreme noise. Air tours have effectively become amusement rides, providing opportunities for travel to 'cool' sites and posting pictures to social media as status statements.

o Air tour operations do not align with the vision and values that offer protections for our nations limited wilderness areas and why national parks were originally established.

o Air tour operations within HVNP do not align with the Hawaii Tourism Authority's vision and management plan to travel 'pono' - respect for the place, people and culture.

• Alternative 2 is supported as it offers the greatest protection from the unacceptable noise impact of air tour operations on the Park's natural and cultural resources, character of the wilderness and the ground-based park users' enjoyment and serenity by requiring air tour operations to maintain maximum distance from the Park's resources. See pages 7-8 of the HAVO Newsletter dated 2.11.2022 for an extended list of resources that would be protected from detrimental noise impacts generated by air tour operations.

• Alternative 3 is not acceptable as it would permit air tour operations to generate unacceptable noise impacts on portions of the Park's natural and cultural resources, character of the wilderness and the ground-based park users' enjoyment and serenity.

• Alternative 4 is not acceptable as it would permit air tour operations to generate unacceptable noise impacts on portions of the Park's natural and cultural resources, character of the wilderness and the ground-based park users' enjoyment and serenity.

• Additional research and information should address the impacts of air tour operations on climate change and air quality.

• In planning for the future of HVNP is it important to reflect on the values and vision identified upon the Park's selection in 1916, when the Hawaii National Park was recognized for its outstanding natural values.

• Furthermore, the establishment of HVNP aligned with the National Park Systems' values and vision as first identified by President Ulysses Grant in 1872 upon establishing the first national park. President Grant stated that these special places should be protected in untamed wilderness from all who would seek to exploit such resources and to preserve these places in a pristine state for the enjoyment of all future generations which might experience

the wonders of nature at their finest.

o The values and visions for our nation's national parks do not align with the unacceptable levels of noise generated by air tour operations.

• In 1980, the United Nations Educational, Scientific and Cultural Organization recognized HVNP as an International Biosphere Reserve. One of 727 biosphere reserves in the world that are "...learning places for sustainable development" and "...sites for testing interdisciplinary approaches for understanding and managing changes and interactions between social and ecological systems, including conflict prevention and management biodiversity."

o Again, this unique status points to the special wilderness area and its related attributes, which continued air tour operations noise only serves to degrade.

• In 1987, HVNP was identified as a World Heritage Site by the United Nations Educational, Scientific and Cultural Organization due to its outstanding cultural and physical importance thus deserving of special protection.

o Again, this unique status points to the special wilderness area and its related attributes which continued air tour operations noise only serves to degrade.

Correspondence ID:	946	Project: 103522 Document:	118739
Name:	McCle	elland, Mary T	
Received:	Apr,01	2022 23:47:32	
Correspondence Type:	Web F	orm	

Correspondence: There is a unique guardianship Americans have entrusted to the National Park Service: to preserve and to protect our national treasures -- some of the nation's most natural, peaceful, beautiful and historic places, while ensuring visitors a high -quality experience. That experience is primarily the natural world including natural sounds.

For more than 20 years NPS has been prevented from protecting what they are mandated to protect by allowing commercial sightseeing aircraft to pollute every natural sound they pass over, making solitude, peace and quiet and reflection impossible. Overflights in the most precious quiet we have remaining are an inconsistent use of our National Parks. The Hawaii Parks are a prime example. Visitors travel to Hawaii National Parks seeking escape from the noise of modern life, not to experience more of it.

No flights, option # is the most appropriate solution to this troubling pollution of the only natural places we have left to experience today and preserve for the future.

Alternative 2 would prohibit all tours within one-half mile of the park boundaries and below 5,000 feet above ground. That is the closest to the Alternative we think is most appropriate - no tours as Representative Case has advocated for.

We should enact full protections for our National Parks and ban tours outright in the ATMP for the Hawaii National Park areas.

Correspondence ID:	947	Project: 103522 Document:	118739
Name:	,		
Received:	Apr,01 2022 23:49:31		
Correspondence Type:	Web F	orm	

Correspondence: Alternative 2: As stated in the ATMP "air tours originating on Hawai'i Island from Hilo, Kailua-Kona, Hāpuna and Waikoloa, and airports on Maui and Oʻahu would still continue to fly more than 1/2mile outside of the Park's boundary at or below 1,500 feet AGL." A likely scenario is that communities that neighbor the park, especially those closest to the 1/2-mile boundary, i.e. the Volcano Golf Course subdivision and Volcano Village, will be rendered nearly uninhabitable due to the daily concentration of tour aircraft overhead. In order to view Kilauea's summit caldera, aircraft that opt to fly below the plan's minimum 5000 AGL will jockey for position, loiter, and circle above residents' homes. Because there is little room for disbursement, the aircraft will be corralled, the noise will be constant, and for most residents, insufferable. Alternative 3 (Northern Route): A Highway-11 corridor flightpath that encompasses/encroaches upon the park and the adjacent Volcano communities is an insupportable scenario. This alternative concentrates aircraft flying above and/or near Namakanipaio Campground, Kilauea Military Camp, Volcano Golf Course and residential area, Steam Vents, Sulfur Banks, Kilauea Visitor Center, Volcano School of Arts and Sciences, and Volcano Village.

To consider...(Northern Route) For viewing of Kilauea Caldera, commercial air tour operators would fly a narrow corridor over Mauna Loa Road (up the road from Kipuka Ki and descending south of Namakanipaio Campground) to the Southwest Rift Zone, an area closed to visitor use. The northern route would be flown at minimum 1,500 ft. AGL altitude, and minimum 2,000 ft. AGL altitude over sensitive sites; no circling or loitering. Aircraft will not fly over Kilauea Caldera or any visitor use area (eg Namakanipaio Campground, Crater Rim Drive, Kilauea Overlook, Jaggar Museum, Keanakako'i etc.) Flights on this route will continue to the coast and fly over the ocean to access Pu'u O'o; the route is reversed for aircraft coming from Pu'u 'O'o.

An invaluable resource for anyone wanting to view the scope of tour helicopter and fixed-wing aircraft in Hawai'i is Flightradar24 https://www.flightradar24.com/19.53,-155.33/10

Correspondence ID:	948	Project: 103522 Document:	118739
Name:	Dorn,	Calvin G	
Received:	Apr,01	2022 23:57:12	
Correspondence Type:	Web F	orm	

Correspondence: K&S Helicopters, Inc. began offering commercial helicopter services and air tours in Hawaii in 1998. has been offering air tours and commercial helicopter services in Hawaii since 1998. Since that time tourism has been a mainstay of the company on the Island of Hawaii. The most popular flight on the island and one that has people coming back over and over is the ability to view the current eruptive activity. Many of these visitors have either been to the Hawaii Volcanoes National Park (HVNP) on the ground or have plans to visit after their Air Tour of the eruptive activity. The primary draw of an air tour on the Island of Hawaii is not the National Park but the actual eruption activity wherever lava is flowing. This magnificent display of nature is easily viewed from the air without any requirement for infrastructure and provides a safe way to view the scope of the eruption and the effect on the surrounding natural and manmade environment. Getting such a broad overview is not physically possible by viewing from the ground and air tours provide a method of transportation for people to see the entire eruption site and have a better understanding of the natural forces at work in our world. This is not just a draw for citizens of the United States but also international visitors who come from around the world to see the volcanic activity on the Island of Hawaii. It is not only tourists that view lava from the air but also geologists who are studying volcanoes. Both from within Hawaii and from outside of Hawaii. Should this ability to view lava be limited to only professionals or should the general public be allowed to view the natural wonder of a volcanic eruption?

Through the years we have seen tourism numbers fluctuate with the activity of Kilauea Volcano as well as economic hard times. Over 100 people were employed by the company prior to the current pandemic and at this time we have been fortunate to build back the business and rehire furloughed employees. If the ATMP as proposed (not including option 1) is enacted we would be at risk of downsizing again while also making it extremely difficult to conduct any long term planning or dedicate resources for future technology or growth. While the current volcanic activity is currently located inside HVNP, it may not be in the future and has not always been contained within Park boundaries. 2016 to 2018 saw lava flows outside of HVNP which allowed our company to conduct tours and build the company by avoiding flying inside HVNP. The proposal in the ATMP to use a fixed window of time to determine actual overflights is not based on reality and does not consider the location of the lava or the economic trends that applied during that time period. HVNP is most likely the only National Park that has air tours which are not focused on seeing the National Park, but focused on viewing volcanic activity. Reducing overflight numbers that were granted as Interim Operating Agreements in 2000 does not take into consideration flights conducted outside the park, operators that have ceased doing business, or the economic and tourism trends that are behind the number of overflights that have been or could be conducted over HVNP.

The National Park System and the FAA had a mandate 2000 to develop ATMPs for specific parks and were

supposed to complete that process in 2 years. 20 years have now passed and companies have come and gone but the operating agreements have remained static. Companies have been purchased and sold with a portion of their value being the commodity of the operating agreement numbers initially promulgated in 2000. The operating agreements are what companies were built on and exist today. These companies provide jobs and contribute to the overall economy of the State as well as provide a draw for tourists to see the natural wonder of volcanic activity. The National Park never mentions a "visitor experience" concerning an air tour but frequently mentions "visitor experience" as a reason to limit air tours. The current ATMP proposals with the exception of option 1 would drastically cut the number of air tours over the Park as if air tours were somehow different from cars or buses bringing visitors to the Park.

Many of these restrictive measures would effectively eliminate air tours over the park or introduce potentially unsafe policies for pilots. Hawaii air tours are already the most highly regulated in the country. These proposals unfairly target a vital part of the Island of Hawaii's economy and reduce the accessibility of our public spaces. Air tours allow us to share Hawaii's cultural, historical and environmental sites with the world in a way that requires zero ground-based infrastructure at the park. This includes providing accessibility to the handicapped and elderly.

Air tours provide opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance, unlike ground-based vehicles.

Air tours are a safe way to experience the park. However, forcing pilots to fly in fixed narrow routes and at higher altitudes than are currently allowed makes it difficult to adjust to constantly changing weather patterns. In addition, higher-flying aircraft spread their sound signature further.

Air tours would have to reroute over other areas on the Island of Hawaii or go out of business if further restrictions are put in place. Hundreds of families and partner businesses would be affected, as well as the operations that air-tour companies directly support.

The National Park Service and the Federal Aviation Administration have been working on the complex issues involved with developing Air Tour Management Plans since the year 2000. The lack of diversity of voices represented by the current plan is concerning. Due to a lack of planning and foresight these plans are being expedited with only a one-month comment period.

Thank you for this opportunity to comment. I urge you to consider Hawaii's air-tour operators in the HVNP ATMP. The ATMP will affect our communities, flight safety, the state's economy and park accessibility should many of the current proposals be incorporated.

Correspondence ID:	949	Project: 103522 Document:	118739
Name:	Camar	a, Bobby	
Received:	Mar,1	5 2022	
Correspondence Type:	E-mail		

Correspondence: Dear Cathy,

I deeply appreciate your making/taking the time to meet with me and discuss helicopters flying over Hawai'i Volcanoes National Park (HAVO).

Much of our focus has been deeply intrusive helicopter presence and their noise over Kaluapele (the summit caldera of Kīlauea volcano), but other areas of the Park are severely impacted too. These include the East Rift Zone (Makaopuhi, Maunaulu, etc.), as well as Maunaloa. On a clear day, as it was last Saturday, we saw (and heard!) several helicopters approach from the ENE of the Maunaloa lookout and watched them fly down to the summit. Voices of native birds faded in the noise, the sound of breezes were obscured, and the peace and quiet of that remote location was shattered.

I remain steadfast in my unequivocal opposition to any commercial air tours over the lands of Hawai'i Volcanoes National Park, no matter on-ground visitation counts at various locations. The top of the Maunaloa Strip Road at 6,500', is remote, but no less important than the summit of Kīlauea. Your taking time to experience and understand air tour noise impacts is gratefully acknowledged. We would appreciate a timeline of ATMP milestones. Many of us have been involved in the effort to ban commercial air tours at HAVO for fifteen and more years. We're frustrated, disappointed, and perplexed at the slowness of the project. WHEN will it be finalized???

Many thanks for listening to our deep and passionate concerns.

Aloha,

Bobby Camara Volcano HI member, HAVO Kūpuna Advisory Group

https://dispatchesfromvolcano.blogspot.com/

" noho i waho • a maliu" "be outside • pay attention" me ka mahalo: hiilei kawelo: hpr: 012918

Correspondence ID:	950 Project: 103522 Document: 118739
Name:	Hussey, Sylvia
Received:	Apr,01 2022
Correspondence Type:	Other

Correspondence: Re: National Parks Air Tour Management Plan for Hawai'i Volcanoes National Park Public Scoping - Proposed Alternatives

Kapāpala and Keahou Ahupua'a, Ka'u Moku, Hawai'i Mokupuni

Tax Map Keys: (3) 9-9-001:001; 9-8-001:001; 1-1-004:003, 020, 034; and, 1-1-001:012

Aloha e Ms. Nadals:

The Office of Hawaiian Affairs (OHA) is in receipt of your February 2022 newsletter inviting us to comment on the proposed alternatives for the Hawai'i Volcanoes National Park (HAVO) Air Tour Management Plan (ATMP). The Federal Aviation Administration (FAA) is preparing this ATMP in cooperation with the National Park Service (NPS). The ATMP will apply to commercial air tours flown at or below 5,000 feet above ground and within a half mile of the park boundaries. The newsletter further indicates that ATMPs are subject to environmental review, and that any comments provided at this time in regards to the alternatives would be used to inform and refine the draft environmental assessment as part of the public scoping process. A preferred alternative has not yet been selected.

The newsletter first presents Alternative 1 as a no action alternative. Under this alternative, commercial flights would still continue under a FAA Interim Operating Authority with no flight path restrictions or limits to altitude or agreement with HAVO. Notably, the National Parks Air Tour Management Act was created to enable the development of ATMPs between the FAA and NPS so that controls over air tours, such as routes, altitudes, time of day restrictions, and/or maximum number of flights for a given period could be established. Aside from the no action alternative, three other alternatives are provided in the newsletter: 1) Alternative 2 - prohibits air tours within the ATMP planning area (up to 5,000 ft) to maximize park resource protection; 2) Alternative 3 - two main flight routes (coastal and northern route) with set flight times between 10AM and 2PM for non-quiet tech1 flights and 10AM to 4PM for quiet tech flights; and, 3) Alternative 4 - three main flight routes (Kahuku, Coastal, Pu'u 'ō'ō) with set flight times between 9AM to 5PM for non-quiet tech flights.

Previously, OHA participated in National Historic Preservation Act Section 106 consultations for the ATMP and did submit formal comments on January 5, 2022. As should be apparent, many park visitors, Native Hawaiian beneficiaries, and the Kupuna Council (cultural advisors to HAVO) consistently advocated against commercial air tours due to adverse effects caused by low flying commercial flights on the use and serenity of the vast cultural landscape present within HAVO boundaries. Further, the Kupuna Council believes that Kīlauea is sacred and has requested a no-fly zone for decades. OHA maintains that a traditional cultural property study be done and appropriate vertical buffers be established given the abundance of cultural concerns presented. While the set of alternatives provided in the newsletter does not create an absolute no-fly zone, OHA does

acknowledge that Alternative 2 does in fact restrict all commercial air operators within the airspace under the ATMP's jurisdiction. As such, OHA believes Alternative 2 should be the preferred option at this time. Beyond the current environmental review process, OHA is aware that members of the Kupuna Council intend to reach out to the Hawai'i Congressional delegation to work towards establishing a no-fly zone up to at least 9,000 feet. As such, OHA will maintain contact with the Kupuna Council and offer support where we can.

OHA does acknowledge that Alternatives 3 and 4 will still be retained as part of the environmental assessment for analysis purposes. To improve these options, OHA recommends that Alternatives 3 and 4 further add no fly days on Sundays, mandatory interpretive training requirements for pilots, restricting flights during cultural events (with mandatory standoff distance), daily caps on flights, and explicit noise thresholds and monitoring methods for quiet technology flights. Further, comments received during the NHPA Section 106 process should be meaningfully integrated into the environmental assessment. As presented in our January 5 letter, a copy of which is attached for immediate reference, OHA maintains that improved flight monitoring methods, cue-based pilot training, and stricter aircraft maintenance requirements must be adopted within the ATMP.

Mahalo for the opportunity to comment. OHA looks forward to continuing consultation and reviewing the forthcoming draft environmental assessment. Should you have any questions, please contact OHA's Lead Compliance Specialist, Kamakana C. Ferreira at (808) 594-0227 or by email at kamakanaf@oha.org.

'O wau iho nō me ka 'oia 'i'o, Sylvia M. Hussey, Ed.D. Ka Pouhana, Chief Executive Officer

Correspondence ID:	951 Project: 103522 Document: 118739
Name:	Tunison, Tim
Received:	Apr,01 2022
Correspondence Type:	Other
Correspondence: Rhonda Loh	

Superintendent, Hawai'i Volcanoes National Park P.O. Box 52 Hawai'i Volcanoes National Park Aloha, Rhonda

Comments on the Disaster Relief Recovery Project

I fully agree with all of the Park's proposed actions to address the purpose and needs of the Disaster Relief Recovery Project, except for the proposed location of the new USGS field station in the historic KMC ball field. The visual impact of new or modified facilities on Park visitor is justified or even mitigated because they will be used by visitors. However, a field station for USGS (HVO and PIERC), with an inevitably large building and parking lot, would greatly add to the visual impact of this proposed project. A potential alternative site at Kilauea summit for the proposed USGS facility is the extensive historic clearing near the current USGS facility. Placing USGS here would have no impact on visitors or significant biological and cultural resources. The electrical and water infrastructure for the facility would be less than 100 feet away, in the current USGS/NPS-Resource Management complex. In addition, there may be added value in keeping the biological researchers and resource managers together to facilitate communication. Mahala for considering my proposed changes to the project. Comments on the draft Air Tour Management Plan

I support Alternative 3 because it greatly restricts air tours and their visual and auditory impacts on Park visitors. However, it permits flights over the potential sources of volcanic activity on the East Rift and the visually significant coastal areas, rather than the rest of the Park. I also concur with the height above ground and time of day restrictions. Congratulations on communicating and working this out with the FAA.

Tim Tunison P.O. Box 754 Volcano, HI 96785 808-769-7258 volcanoplantguy@gmail.com

Correspondence ID:	952 Project: 103522 Document: 118739
Name:	Evans, Mary Alice
Received:	Mar,28 2022
Correspondence Type:	Other

Correspondence: March 28, 2022

Attn: Hawai'I Volcanoes National Park ATMP

Subject: National Environmental Policy Act- Early Consultation Request, Hawai'I Volcanoes National Park, Air Tour Management Plan

Thank you for the opportunity to provide comments on the early consultation request for the proposed Air Tour Management (ATMP), for Hawai'i Volcanoes National Park. The notification request was sent via memo dated February 28, 2022. It is our understanding that the National Park Service (NPS) is initiating a scoping process under the National environmental Policy Act (NEPA) to address long-term air tour operations against public use needs of this national park.

The National Parks Air Tour Management Act of 2000 requires the federal aviation administration (FAA), in cooperation with NPS, to develop an ATMP for parks and tribal lands where operators have applied to conduct commercial air tours. The objective of this ATMP, under the Act, is to develop acceptable and effective measures to mitigate significant adverse impacts of commercial air tour operations on the natural and cultural resources, Native Hawaiian sacred sites and ceremonial areas, wilderness character, and visitor experience of Volcanoes National Park.

The Office of Planning and Sustainable Development (OPSD) has reviewed the transmitted material, and has the following comments to offer:

### 1. Resources for Consideration for the NEPA Environmental Assessment (EA)

As listed in the FAA/NPS February 2022 Newsletter on the ATMP study, page 3 lists the issues that will be examined in the EA. Impacts and issues of critical interest for OPSD include biological resources; climate (climate change and proposed adaptation strategies); coastal resources; cultural resources; recreational uses by the public; socioeconomics; visual effect; and water resources. We reserve comment on these topics until the Draft EA is available for public review.

### 2. Coastal Zone Management Act (CZMA), Federal Consistency

The national CZMA requires that federal actions be consistent with approved state coastal programs enforceable polices. Federal actions include activities performed by a federal agency; activities that require federal permits or approvals; or state and local government projects that receive federal financial assistance. As this action is proposed by the National Park Service, it may be subject to a CZMA federal consistency review.

OPSD is the lead state agency with the authority to conduct CZMA federal consistency reviews. We recommend that your agency consult with our office on the applicability of CZMA federal consistency requirements as it pertains to this project.

### 3. Hawai'i Coastal Zone Management (CZM) Program

The CZM area is defined as "all lands of the State and the area extending seaward from the shoreline to the limit of the State's police power and management authority, including the U.S. territorial sea "under Hawai'i Revised Statues (HRS) 205A-1

Pursuant to HRS 205A-4, in implementing the objectives of the CZM program, agencies shall consider ecological, cultural, historic, esthetic, recreational, scenic, open space values, coastal hazards, and economic development. The Draft EA would benefit from the inclusion of a discussion on the project's consistency with the polices of the Hawai'i CZM Program, HRS 205A-2, as amended. In particular, the objectives that appear to be pertinent to this management plan study include recreational resources; historic resources; scenic and open space' economic uses; managing development; and public participation.

The objectives and supporting policies of the Hawai'i CZM Program serve as the foundation of the enforceable policies of the State of Hawai'i, as listed in HRS 205A-2. Disclosure of impacts on CZM objectives and supporting

policies, as it relates to HRS Chapter 343 requirements, will aid the State in determining impacts to the resources of the coastal zone, and mitigation measures on the subject lands involved for this proposed action.

If you have any questions, please contact Joshua Hekekia on Environmental Assessment concerns as they relate to this OPSD response letter at (808) 587-2845 or Debra Mendes on CZMA federal consistency at (808) 587-2840.

Sincerely, Mary Alice Evans Director

Correspondence ID:	953 Project: 103522 Document: 118739
Name:	O Kekuhi, Halau
Received:	Mar,14 2022
Correspondence Type:	Other

Correspondence: Mahalo...

I was trying to do a hookup at noon in the fall of 2018 at Wahiniakape. Of course, the time of day I expected a crowd with halau in tow we did our thing with the crowds there it was like Aloha Week.

But I couldn't help but think of maximum capacity and the fragile areas of the environment being overrun. \*More short walk trails for families w/rest areas

\*No one benefits from air tours the ohia forest has to deal with volcanic exhausts emissions

Halau O Kekuhi Hilo, HI

Correspondence ID:	954	Project: 103522 Document:	118739
Name:	Case, Ed y		
Received:	Apr,01	2022	
Correspondence Type:	Other		
Correspondence: April 1, 2022			
Volpe National Transportation Systems Center Ms. Kaitlyn Rimol, V-326 Attn: Hawaii Volcanoes National Park ATMP 55 Broadway Cambridge, MA 02142			
Dear Ms. Rimol: SUBJECT: Hawaii Volcanoes National Park Air Tour Management Plan (ATMP) Environmental Assessment (EA)			

located on the Island of Hawaii on behalf of the United States Department of the Interior, National Park Service Thank you for the opportunity to review and comment on the subject matter. The Land Division of the Department of Land and Natural Resources (DLNR) distributed or made available a copy of your request pertaining to the subject matter to DLNR's Divisions for their review and comments.

At this time, enclosed are comments from the (a) Chairperson, (b) Engineering Division, and (c) Land Division - Hawaii District on the subject matter. Should you have any questions, please feel free to contact Darlene Nakamura at (808) 587-0417 or email: darlene.k.nakamura@hawaii.gov. Thank you.

Sincerely, Russell Y. Tsuji Land Administrator

Enclosures: Cc: Central Flies

Name:		Kauakaole, Nalaui
Received:		Apr,01 2022
Correspondence T	ype:	Other
Correspondence:	The fragile nature of Ohia fo	prests should not have to deal with the exhaust and emissions of

Correspondence: The fragile nature of Ohia forests should not have to deal with the exhaust and emissions of planes- your forests does not look healthy enough it has to deal with the volcanic exhaust! Who benefits from air tours?

Correspondence ID:	956 Project: 103522 Document: 118739
Name:	N/A, Lyle
Received:	Apr,01 2022
Correspondence Type:	Other
Correspondence: 3/1/22 Volcano N. Parks	

Dear Folks.

I can not count the number of times I have written about the helicopter and fixed-wing of flights over and around HI Volcanoes Nat.Parks or the literally hundreds of other times I've wanted to write. I have been in this area for 40 years. In the mid 80's there was a little helicopter tourist activity, but today the sounds of helicopters are inescapable anytime from sunrise to sunset. Often multiple helicopters are seen and heard at one time, not only over the park but over our Pii Maura neighborhood adjacent to the park. Often the helicopters cross directly over the homes and occasionally at low elevations which actually rattles the windows.

Occasionally military jets and high speed/powered helicopters fly over Kilauea Caldera, making circles. Though I am not certain they appear to be joy fluing, as the caldera doesn't seem to be harboring dangerous aliens or pose military threats, but I could be wrong about that.

As I write this now, I hear three different helicopters in the immediate area. I've seen/heard as many as five at one time. As time passes it appears they are only increasing numbers of helicopter tours, though I have not kept statistical record. My hope is that the Feds and State can finally address this issue with serious limits and enforcement.

Sincerely,

Lyle

Correspondence ID:	957	Project: 103522 Document:	118739
Name:	Mamae	, Violet	
Received:	Apr,01	2022	
Correspondence Type:	Other		

Correspondence: In response to Hawai'i Volcanoes ATMP No air tour, by plane, helicopter, jets, rockets, missiles should pass over Hawai'i Volcanoes National Parks or any other Hawai'i National Parks, respect to due to vibrations, sound waves and vibrations, speed vibrations, any kind of air vibrations in any way shape or form. No means of desecration, destruction, harm vibrations, negative energy, negative vines of any sort by or from air or any other means be accepted.

We are descendants of our Hawaiian ancestors and would very much, thank you take care (Malama) our Kupuna Juiz as well as all of their (our) Hawaiian sacred sites, temples, rock walls, rock heiau's etc., ceremonial areas, our area and its culture, burials, our natural resources, plants, wilderness and their culture and all that is sensitive to any harm in any way, shape or form, in Jesus name.

Preserve, Perpetuate and Protect Hawai'ian.

Ku'u'inoa, Violet Leihula Mamae March 3, 2022

Correspondence ID:	958 Project: 103522 Document: 118739
Name:	Suiit, Jaqueline
Received:	Mar,28 2022
Correspondence Type:	Other

Correspondence: Park: Hawaii Volcanoes National Park Project: Hawaii Volcanoes Air Tour Management Plan (ATMP) (ID: 103522) Document: ATMP Potential Alternatives Newsletter and FAQs (ID:118739)

My family, friends and I have travelled several times with Paradise Helicopter tours and have always been impressed with the professionalism and concern for our safety that both the pilots and staff showed. Please do not put these restrictions on those amazing tours! They are a vital part of the charm of the Hawaiian Islands!

Jaqueline Suitt 38315 Maracaibo Cirw. Palm Springs, CA 92264 jackiesuitt@gmail.com

Demographics - Demographics Report - PEPC ID: 103522

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## Final EA – Additional Appendix Materials

### Appendix K – CZMA Compliance

Conditional Concurrence Letter from the Hawai'i Coastal Zone Management Program Office



# STATE OF HAWAI'I OFFICE OF PLANNING & SUSTAINABLE DEVELOPMENT

235 South Beretania Street, 6th Floor, Honolulu, Hawai'i 96813 Mailing Address: P.O. Box 2359, Honolulu, Hawai'i 96804 JOSH GREEN, M.D. GOVERNOR

> SYLVIA LUKE LT. GOVERNOR

MARY ALICE EVANS

Telephone: (808) 587-2846 Fax: (808) 587-2824 Web: https://planning.hawaii.gov/

### DTS 202305111135ME

June 22, 2023

Mr. Eric M. Elmore Federal Aviation Administration 800 Independence Avenue SW, Suite 900W Washington, DC 20591 Email: eric.elmore@faa.gov

Dear Mr. Elmore:

Subject: Hawai'i Coastal Zone Management Program Federal Consistency Review for Hawai'i Volcano National Park Air Tour Management Plan at Hawai'i Volcano National Historic Park, Island of Hawai'i

The Hawai'i Coastal Zone Management (CZM) Program has completed the federal consistency review of the Federal Aviation Administration (FAA) proposed implementation of the air tour management plan (ATMP) for Hawai'i Volcano National Historic Park (Park). This federal consistency covers the following project elements as represented in the CZM federal consistency application and supporting information:

The proposed action is to implement the preferred alternative ATMP for the Park which describes the conditions for the conduct of air tour operations over the Park including: routes, altitudes, time-of-day restrictions, restrictions for particular events, maximum numbers of flights, and other provisions. The preferred alternative ATMP would limit the number of authorized commercial air tours to 1,565 each year with daily limits; prohibit air tours on Sundays and include a mandatory 5-mile standoff for special events that could be impacts by air tours, limited to the day of the event; and special events could include Native Hawaiian events or other natural and cultural resource programs. The ATMP designates three routes:

• Pu'u'ōō Route: Runs on the east rift of Kīlauea in the Pu'u'ōō area with a single entry and exit over the ocean. Operators that have converted to quiet technology aircraft may request to be allowed to conduct air tours in an expanded fly zone directly west of this route near Pu'u'ōō. Minimum altitude is 1,500 ft above ground level (AGL) over land and 2,000 ft AGL over the ocean. Hovering, loitering, and/or circling for up to five minutes is allowed.

Coastal Zone Management Program

Environmental Review Program

Land Use Commission

Land Use Division

Special Plans Branch

State Transit-Oriented Development

Statewide Geographic Information System

Statewide Sustainability Branch Mr. Eric M. Elmore June 22, 2023 Page 2

- Coastal Route: Runs bi-directionally offshore along the edge of the park boundary, but within ½ mile of the park bounary, with a 2,000 ft lateral distance from shore and at minimum altitude of 2,000 ft AGL.
- Kahuku Route: Runs bi-directionally accross the Kahuku Unit following Highway 11 at minimum atitude of 1,500 ft AGL.

On days when air tours would be permitted, they may only be conducted from 10:00 am to 2:00 pm, unless they are flown using aircraft that qualify for the quiet technology incentive, in which case they may be conducted from 9:00 am to 5:00 pm; helicopter operators would be required to complete the FAA interpretative training and education; and helicopter operators would be required to attend annual meetings with Park staff and local FAA staff.

The Hawai'i CZM Program published a public notice in the State Environmental Review Branch publication, "The Environmental Notice," on May 23, 2023, with the public review and comment period concluding on June 7, 2023. During the public notice period no public or agency comments were received.

We conditionally concur with the determination by the Federal Aviation Administration that the proposed activity will be undertaken in a manner consistent to the maximum extent practicable with the enforceable policies of the Hawai'i CZM Program. The following conditions shall apply to this consistency concurrence:

- 1. The proposed activity shall be carried out as represented in the CZM federal consistency application and certification. Any changes to the proposed activity shall be submitted to the Hawai'i CZM Program for review and approval. Changes to the proposed activity may require a full CZM federal consistency review, including publication of a public notice and provision for public review and comment. This condition is necessary to ensure that the proposed action is implemented as reviewed for consistency with the enforceable policies of the Hawai'i CZM Program. Hawai'i Revised Statutes (HRS) Chapter 205A Coastal Zone Management, is the federally approved enforceable policy of the Hawai'i CZM Program that applies to this condition.
- 2. The mitigation measure for protected terrestrial/marine species that were represented in the Draft Environmental Assessment for an Air Tour Management Plan for Volcano National Park, which was included as supplemental information in support of the CZM consistency determination, shall be fully implemented. This condition is necessary to ensure consistency with Hawai'i CZM Program federally approved enforceable policies HRS Chapter 205A Coastal Zone Management, Section 205A-2 Coastal Ecosystems, HRS Chapter 195D Conservation of Aquatic Life, Wildlife, and Land Plants, and HAR Chapter 124 Indigenous Wildlife, Endangered and Threatened Wildlife, Injurious Wildlife, Introduced Wild Birds, and Introduced Wildlife.
- 3. The proposed activity shall be in compliance with the requirements of the State Historic Preservation Division (SHPD) consultation under HRS Chapter 6E Historic Preservation

Mr. Eric M. Elmore June 22, 2023 Page 3

/ Section 106 National Historic Preservation Act that was initiated by the FAA on March 29, 2021. This condition is necessary to ensure consistency with Hawai'i CZM Program federally approved enforceable policy HRS Chapter 6E Historic Preservation.

If the requirement for conditional concurrence specified in 15 CFR § 930.4(a), (1) through (3), are not met, then all parties shall treat this conditional concurrence letter as an objection pursuant to 15 CFR Part 930, subpart C. The Federal Aviation Administration shall immediately notify the Hawaii CZM Program if the conditions are not acceptable in accordance with 15 CFR § 930.4(a)(2). Otherwise, acceptance of the conditions shall be presumed at the end of the 90-day federal consistency notification period on August 8, 2023.

This CZM consistency conditional concurrence does not represent an endorsement of the proposed activity, nor does it convey approval with any other regulation administered by any state of county agency. Thank you for your cooperation in complying with the Hawai'i CZM Program. If you have any question, please contact Debra Mendes of our CZM Program at (808) 587-2840 or Debra.L.Mendes@hawaii.gov

Mahalo,

· Mary Alice Evans

Mary Alice Evans Interim Director

 c: Department of Land and Natural Resources (DLNR), Division of Aquatic Resources DLNR, Division of Forestry and Wildlife DLNR, State Historic Preservation Division DLNR, State Parks County of Hawai'i, Planning Department