



National Parks Overflights Advisory Group Meeting and Field Trip SUMMARY REPORT

Meeting - Tuesday, May 14, 2019
Meeting & Field Trip - Wednesday, May 15, 2019

Grand Teton National Park
Craig Thomas Discovery Center
1 Teton Park Road
Moose, WY 83102

ACTION ITEMS for the National Park Service (NPS) and Federal Aviation Administration (FAA), aka “the Agencies”

1. Provide NPOAG with Tribal coordination steps/best practices for developing Agreements and trust responsibilities within DOI.
2. Answer if the public can attend operator-specific meetings related to forming Agreements, or the annual/semi-annual meetings with operators who have already entered into Agreements (e.g., Glen Canyon / Rainbow Bridge).
3. Look into NPATMA language to see if “such other information” could include route information/maps to help with data collecting.
4. Add more NPOAG history and group feedback to the 15-Year Review.
5. Share the video/animation of straight vs. turning data for the Fly Neighborly training.
6. Share the information that park superintendents are receiving associated with the Agreement process (handbook, lessons learned, tribal procedures, etc.).
7. Continue conversations between NPS/FAA regarding the final operators at Glen Canyon that require some sort of management.
8. Consider issue-specific NPOAG subcommittees when they might be effective for problem solving and brain storming.
9. Consider building in violations/compliance language into Agreements at the onset.

SUGGESTIONS FOR CONSIDERATION for the Agencies

1. Create joint FAA/NPS letterhead for formally issued notices.
2. Request for information on the operators from Bryce Canyon National Park who did not respond to the voluntary surrender letters.
3. Request for names of the nine operators that received letters associated with the pre-planning for future Agreements.

APPENDIX LIST

Appendix A: Attendees List and Meeting Sign-In Sheet

Appendix B: Agency Updates Presentation

Appendix C: 2018 NPOAG Action Items and Suggestions

Appendix D: Air Tour Reporting Data Presentation

Appendix E: Air Tour Management Presentation

Appendix F: Enforcement and Compliance Framework Presentation



Appendix G: Fly Neighborly PDF

Appendix H: Streamlining Air Tour Agreement Process Presentation

Appendix I: NPOAG 15-Year Review Presentation

Appendix J: Tracking Aircraft Using ADS-B Presentation

Appendix K: FOIA Request for Air Tour Reports Presentation

Appendix L: Written Public Comment from Friends for a Quiet! Glacier

Appendix M: Public Comment Sign-In Sheet

Appendix N: Agenda

DAY ONE

Introduction to the People and Purpose of NPOAG

Ray Sauvajot (NPS), Keith Lusk (FAA), Vicki Ward (NPS), Kevin Welsh (FAA), Bryant Kuechle (The Langdon Group)

Welcome: Gopaul Noojibail, Grand Teton National Park Deputy Superintendent, welcomed NPOAG members to Wyoming. He mentioned that Grand Teton National Park (GRTE) is the only national park with a commercial airport in the park, and recognized the great relationship between the park and airport. He made remarks about increased visitor use and exploring ways to enhance the visitor experience, welcome people, and preserve the natural and cultural resources of the park.

Ray Sauvajot, ADNRSS, NPS, welcomed the group and stated that he has been pleased with the general tenor and efforts of FAA, NPS and NPOAG since the beginning. Karen Trevino, Chief, Natural Sounds and Night Skies Division, NPS, expressed condolences and thoughts regarding the recent plane crash in Alaska.

Introductions, Logistics, Ground Rules: Bryant Kuechle, facilitator from The Langdon Group (TLG) prompted introductions of everyone around the table and members of the public in chairs along the room perimeter. Alan Stephens, Grand Canyon Airlines, joined by phone. *See Appendix A for a complete list of attendees.*

Bryant reviewed ground rules, requesting that for an effective meeting everyone please value the diversity of the group, be respectful, let everyone speak, and be mindful of agenda timeframes. If NPOAG members had questions or comments, Bryant asked that they stand their name tags on end for him to call on. Bryant then reviewed the agenda and highlighted the designated public comment period at the end of day and the next day, reiterating that the public sign up beforehand to give three to five minutes of comment.

Opening Remarks: Kevin Welsh, FAA Office of Environment and Energy stated that his office's focus is on reducing environmental impacts of aviation (e.g., emissions, noise). They are running a research program that has grown under the current administration, with a recognition that noise, in particular, is an important issue to study and discuss. Raquel Girvin, FAA Western-Pacific Regional Administrator thanked GRTE for hosting. She has worked on air tour issues with people at the meeting and has also worked on policy issues. In her new role, noise is the big topic.

Agency Updates: Keith Lusk, FAA Special Programs Office Program Manager, gave an overview of NPOAG, covering the group's establishment, purpose of the group, membership, and lobbying



restrictions. *See Appendix B for his complete presentation.* Keith stated that they are considering recommendations to increase the frequency of meetings, and that they will continue to check on compliance regarding federal lobbying status of members. There was also mention of Rob Smith and Matt Zuccaro's NPOAG seats becoming open this summer – one seat representing environmental interests and one representing air tour operator interests. Vicki Ward, NPS Overflights Program Manager, stated that there is also an announcement out regarding an opening for a tribal representative seat on the NPOAG. The opening will go until the end of the month, and she requested feedback from the group to let her know if there is anyone they can do outreach to for the open seat.

The group provided updates on last meeting's action items. *See Appendix C for 2018 NPOAG Action Items and Suggestions.* Action Items Update:

1. Send information about the FAA Reauthorization Act of 2018 as it relates to NPATMA. (NOTE: the bill was signed by the President on October 5. It does not contain the transportation route amendment.) **This was not sent out since it did not affect legislation going forward.**
2. Send guidelines out to NPOAG about restrictions on members being registered federal lobbyists. **This was sent, and everyone is current and up to date.**
3. Send link out to NPOAG with the Glacier Air Tour Noise Modeling Report, when available. **This was made available last Thursday (5/18) and is posted on the NPS's [Integrated Resource Management Applications \(IRMA\) Website.](#)**
4. Email out the Whitlow opinion that discusses how interim operating authority (IOA) is not a property right. – **COMPLETE**
5. Continue exploring use of Commercial Use Authorization (CUA) as part of compliance of Agreements. **This will be discussed later in today's meeting.**
6. Continue to pursue NPATMA and Air Tour Management Agreements (Agreements) handbooks and provide an update at the 2019 meeting. **This will be discussed later in today's meeting.**
7. Email out Flight Standard Information – **COMPLETE**
8. Provide ADS-B update (Phase 3 of pilot study) for next meeting. **Presentation tomorrow.**

SUGGESTIONS FOR CONSIDERATION for the Agencies

1. Review Glen Canyon/Rainbow Bridge Air Tour Management Agreement in approximately one year to see how it is working. **Will discuss during meeting.**
2. Request to create a separate reporting bar chart to show annual trends that does not include New York Harbor Parks. **Upcoming data reporting has the updated bar chart.**
3. Request to see the closest approach to Muir Woods and a map of where the flights are traveling. **Not prepared to discuss – add to parking lot.**
4. Request for more frequent updates, beyond what is currently provided annually, regarding operator-specific data for Hawaii Volcanoes, Great Smoky Mountains, and Glacier. **Not prepared to discuss – add to parking lot.**
5. Consider providing different (not specified) information in the annual reports to show a clearer picture of tour flight activity. **Not prepared to discuss – add to parking lot.**
6. Consider not using tail numbers in reporting when aircraft are added and deleted so frequently. **Kept in as a metadata field.**
7. Consider increasing public involvement in Agreement processes and in follow-up meetings. Specifically, in reference to including the public in follow-up meetings with operators about the Glen Canyon/Rainbow Bridge Agreement.



8. Consider geofencing with ADS-B technology. **Adam will touch on that in an upcoming presentation.**
9. Consider future focus on verification of self-reported data gathering (accuracy and completeness). **Will talk more about this during this NPOAG meeting – it is being looked into. Flight tracking technology is the primary avenue being pursued.**
10. Consider providing Grand Canyon “spiked wheel” 2015, 2016, 2017 comparison by 12/31/18. **A draft report on the Grand Canyon Quiet technology incentive is being prepared. The goal is to come out with a consistent format every year.**
11. Recommend FAA and NPS resolve NEPA issues to allow ATMPs as a viable air tour management option. **There is a focus on voluntary Agreements. Karen and Eric will talk about revisiting ATMPs.**
12. Consider using NPOAG more in advising NPS/FAA on their priorities in air tour management. **It is being considered.**
13. Consider “Day of Quiet” in national parks every week. **An operator in Hawaii tried not flying on Sundays, but unsure of the impact or if the operator was still committed to this effort.**
14. Proposal to meet on a nine-month or bi-annual meeting cycle and hold longer meetings but still avoid June-August. **The agencies are keeping cost and timing in mind. One idea has been to have a fixed location in the fall (maybe Denver – easy to get rooms, central location) with another meeting in late winter or early spring, perhaps in conjunction with Heli Expo. Agencies are not ruling out parks, although parks have more logistical issues and travel costs. There was continued discussion that if there are still situations in Hawaii being discussed, it would still be valuable for NPOAG to meet there. It is worthwhile to meet where air tours are happening.**
15. Many of the issues discussed at this meeting are the same issues that have been discussed for many years but have seen little progress. Explore methods and ideas to increase efficiency and completion of issues related to NPATMA implementation. **NPS and FAA noted this comment.**
16. Consider further discussion about how drones fit into the airspace over NPS units as a topic. **It is being considered.**
17. Location/Timing considerations for next meeting:
 - a. Alexandria, VA
 - b. Atlanta, GA (in coordination with Heli Expo, March 2019)
 - c. Jackson Hole
 - d. Hawaii
 - e. Denver or Fort Collins
 - f. Any park in the Agreement process/under discussion, such as Acadia
 - g. Consider timing with an Agreement milestone or at the front end of a process to help provide guidance.
18. Consider issue-specific NPOAG subcommittees. **This will be discuss further during the 15-year review presentation.**

Air Tour Reporting (See Appendix D for full presentation)

Brent Lignell (NPS)

Brent reviewed the current data reporting for air tours. Each year, NPS generates a report that captures a high level summary of what happens across the entire NPS system. The presentation was a preview of the data which reflects 78 units where tours are authorized and 55 units where at least one tour occurred last year.

Highlights of Brent’s presentation included the following:



- Significant drop in Hawaii Volcanoes NP air tours due to volcanic activity and temporary flight restrictions.
- Table 3 – Top 10 parks. San Francisco Maritime – always suspected high activity but didn't have the reports to back that up, but the data are now available.
- Table 4 – New York – a reduction in flights is the result of a city mandate that required a reduction of 50% from 2015 levels by 2017, and also included a ban on flights on Sundays).
 - QUESTION: Is New York at steady state numbers or are further reductions coming?
ANSWER: Steady state.
- Table 5 – There are some regions with a lot of activity and others with little.
- Table 6 (quarterly trends) – activity ramps up in spring and summer. Some parks are level, but there are peaks throughout the system.
- All reports were received for 2018, although about 50% of them are late. That is improving as there is still an effort to get reports in on time.

Brent mentioned that these data are used to screen where ATMPs or Agreements are required. The data can also be used for acoustic modeling to analyze resource impacts.

Keith Lusk mentioned that reporting requirements were stood up in 2012, with 2013 being the first year of data collection. In December of 2015, they went back to OMB to ask for three-year extension as required under the Paperwork Reduction Act, to show agencies aren't putting undue burden on people in terms of data requirements. Similarly, in December 2018 FAA was on track to get another extension but the government shutdown occurred and we are now currently operating on a rolling one month extension on the reporting template. The question has come up regarding level of detail and frequency needed in reporting. FAA is looking for NPS help on current needs. Question for the group: Does collecting reporting data bi-annually or annually lose anything? What are the pros and cons? How would that impact (or not) operators?

There was feedback from the operators that little would change from their perspective because operators have to record the data anyway. It's a wash for operators – it doesn't make a difference, although the volume of data on an annual basis would be huge for some operators. Quarterly reporting gives folks a chance to take it in small chunks. If bi-annual reporting was instituted, you could designate when to do it (example: 1st and 3rd quarters tend to be less of a busy time for some with shoulder seasons.) It was asked if there is a way to get comments from operators on this, and responded that the OMB process has a comment period.

Rob Smith, National Parks Conservation Association, asked for a clarification on park exemptions from the Exempt Park's List and what triggers that request. This request comes from the park.

Dick Hingson, Sierra Club, inquired about how to get an ATMP that results in no flights allowed over the park. He also suggested that some other data points could be valuable in showing the intensity of the data (example: showing the acreage of the park in comparison to flights, showing peak days, etc.)

Break

Air Tour Management (See Appendix E for full presentation)

Vicki Ward (NPS), Keith Lusk (FAA), Brent Lignell (NPS)

Presenters reviewed the status of Agreements for Mount. Rushmore and Badlands. It was asked why these parks need Agreements. The goal at these parks is to memorialize, for the most part, the current conditions, ensuring that proposed changes are discussed and agreed upon. An Agreement or ATMP is required at both parks because they both have more than 50 annual tours. Rushmore/Badlands were the



first ATMPs that the agencies started so there is some existing information. One of the reasons for starting at Mount Rushmore was that there was an agreement with the operators, park, and Flight Standards District Office (FSDO) on routes and operations that was revisited annually to make sure it was still working for the parties.

Dick Hingson recalled that a superintendent at Mount Rushmore prepared a draft impairment statement. Karen Trevino stated that there was no impairment statement. There was a preliminary determination, but that draft was never released to the public and the subsequent two superintendents did not reaffirm that finding.

While reviewing the Glen Canyon and Rainbow Bridge Agreements, Vicki Ward stated that there are still ongoing discussions with one operator that is not part of the Agreement. During the annual meeting between the park and operators, operators suggested some amendments to their Agreements and park is considering those changes. There are three management zones in that unit and there is management specific to each zone. Flight conditions are also specific to those three management zones.

Inquiries were made about the process to increase IOA for an operator. It was asked if IOA is increased in size or taken from another operator. Keith Lusk stated that everything is on the table, so the goal is to reach an agreement amongst everyone. If an Agreement wasn't being pursued, the operator could ask for an increase in their allocation.

Vicki Ward stated that the operators that have IOA have their limit, unless they ask for more or they enter into an Agreement. An operator can ask for more but the park can say no.

John Eastman asked if it was agreed that IOA was not increasing. Karen Trevino responded that once an Agreement is entered into or an ATMP is completed, IOA goes away and flight numbers are limited to what is in the Agreement or ATMP.

Keith Lusk stated that he didn't think FAA would wholesale say that in a specific park (with certain characteristics with a low impact to resources) the agencies wouldn't go above what is currently allowed. On the first two voluntary Agreements done for Big Cypress and Biscayne, there was one existing operator. The agencies established a voluntary Agreement, and reduced from IOA levels that one existing operator had, to allow another operator to participate.

Carl Slater of the Navajo Nation Council asked about what sort of tribal involvement there was in the discussions for Agreements, generally. Specifically with respect to MORU, Brent Lignell responded that the air tour routes in the Agreements do not fly over tribal land, but both MORU and BADL parks have had discussions with tribal representatives with issues that concern them. No formal Government to Government consultation with the FAA and NPS is part of the MORU Agreement, but the outreach to the tribes can and has happened at the park level (Big Cypress, GLEN, and RABR). Carl brought up the topic of tribal ceremonies and events, and the need for agencies and operators to understand when and where those happen.

Dick Hingson asked if there was any public observers at the April 23 Glen Canyon / Rainbow Bridge operator meeting, and the agencies said there wasn't. Karen Trevino said that the NPOAG meetings are open to the public but because operator-specific meetings might contain proprietary information they weren't sure if the public could attend. The agencies would check and report back.

Rob Smith asked about the incentives for operators to be part of the Agreement. Alan Stephen, Grand Canyon Airlines, responded that the incentive is that in the absence of Agreements, the NPS is obligated to do an ATMP. Alan felt the negotiation resolved all the issues in a reasonable way and therefore thought it better to opt in to an Agreement than take chances with an ATMP. There is one operator who isn't engaging in the Agreement process at Glen Canyon/Rainbow Bridge.



Rob Smith asked for an update on the status of the Agreement. Alan Stephen responded that the curfew times are an issue (three different curfew times). He believes it is impractical. There is also an issue of flexibility of flights over natural zone. Over the course of the negotiation they failed to recognize that we're flying from Rainbow Bridge to Monument Valley, so they are asking for a path for a mile deviation over the Colorado River to be able to go over the natural zone. That natural zone is huge. The NPS is sympathetic to the requested flexibility. There is also a question about increase in allocations. There is a desire to get a couple of years into it to see how the voluntary Agreement works, and then take a look at an opportunity to increase allocations if necessary. One of the ways to do that is with quiet technology.

John Eastman asked about concerns tied to tribal impacts. Vicki Ward responded that the main concern was privacy issues because of where people lived. Karen Trevino also stated that there are also issues with vibrations, noise, livestock, etc. Operators must maintain a 2,000-foot lateral offset from Rainbow Bridge.

John Eastman asked if there was any education for operators regarding Native American tribes and impacts. Brent Lignell said operators are educated on when and where to fly. There are also discussions about management issues the park faces as well as tribal concerns. Some operators have established those relationships so they can learn tribal-specific information to share with their visitors.

During the discussion on voluntary surrender letters, Rob Smith asked how long IOA has been in place. Keith Lusk responded that FAA developed the rule in 2003 and formally granted IOA totals in 2005. Rob asked what the incentive is to relinquish IOA. Keith stated there is probably not a lot of incentive, and the agency is at the end of the voluntary approaches to IOA surrender.

Dick Hingson requested information on the operators from Bryce who didn't respond to the voluntary surrender letters.

Alan Stephen stated that Grand Canyon Scenic Airlines and some others have half the IOA for Bryce. Their business model has changed and they are not doing that type of service right now, but they are not going to give up the 1,500 IOA on the chance that they may want to re-start that service now that there is an increased demand for tours to Page, Lake Powell and Grand Canyon. Alan thinks Bryce could increase again, and there is nothing requiring them to give their IOA.

During the discussion on pre-planning for future Agreements, the FAA reported sending out letters to nine air tour operators identifying parks where Agreements had been completed or were underway and indicating the agencies plans to commence Agreements at remaining parks at some point in the future. Dick Hingson requested the names of the nine operators that received letters. To date, route information had only been received from one of the operators, the one from Great Smoky Mountains.

Karen Trevino asked for feedback from operators if they would prefer Air Tour Agreements rather than ATMPs. She said that it is difficult to do modeling without routes.

Adam Beeco also reiterated that NPS would like the routes. NPS tries to identify the most commonly used routes, looking at the percentages of routes used to do the noise modeling to optimize the amount of information gained from modeling. Karen Trevino asked again about how to get information on routes to do planning.

John Eastman asked about what is needed from operators that is not in their report. Karen Trevino responded that it's the routes – NPS doesn't know where the route are being flown or the altitudes they are flown at, the agencies are just receiving the route name/code in the quarterly reports. The routes cannot be mapped from that information alone.

Enforcement and Compliance Framework Discussion (See Appendix F for full presentation)



Vicki Ward (NPS) and Karen Trevino (NPS)

This presentation fulfilled a request from NPOAG from two years ago, and is preliminary draft information at this point. The presentation was put together with help from the DOT Volpe Center to start the discussion and get input. Karen Trevino reviewed two different categories for violations – violations that are administrative (delays in reporting, not reporting in correct format, etc.) vs. violations that impact resources and visitor experience. *See presentation for enforcement frameworks and violation examples.*

Melissa Rudinger, Aircraft Owners and Pilots Association, stated that safety could be improved by pursuing compliance instead of pursuing enforcement.

John Eastman observed that if a letterhead could be developed that references both agencies, it might help both agencies capture joint information and messages associated with compliance and enforcement.

It was also suggested to build in violations/compliance into VA's at the onset. Eric Lincoln asked the agencies how they deal with operators who are non-compliant. Keith Lusk responded that the FAA has been alerted to behavior and incidents that they have investigated in a standard process through FSDO. There has been follow-up by the FAA when there have been exceedances in IOA and they haven't seen any recurring issues with those operators. This process will remain the same with Agreements in place.

Karen Trevino stated that operators who are not signatories to an Agreement are still held to the quarterly reporting requirements and IOA limits.

Eric Lincoln followed up and asked if the enforcement could be FAA removing IOA. Keith Lusk said that FAA has procedures and processes to investigate and make findings and determinations from a safety perspective. The FAA has held people accountable for IOA exceedances.

Karen Trevino stated that the need for credible evidence will be required to trigger a compliance action. An action would only be triggered based on credible verification of an issue.

John Eastman asked if there are any sanctions if air tour operators do not report. Keith Lusk said that people are submitting, it's just not been in a timely fashion, although that has gotten better recently.

John followed up and asked if they could require maps/routes to be submitted with quarterly reports. He inquired if the clause "such other information" in the reporting statute could allow the agency to request map/route information. Keith and Karen would look into that.

Les Blomberg, Noise Pollution Clearinghouse, commented that compliance under an Agreement can be straightforward, however voiced concerns about the types of non-compliance and issues that do not fall under voluntary Agreements (IOA, non-reported flights, impact to park resources etc.). Keith Lusk discussed staffing and resourcing challenges for that type of surveillance, in regards to monitoring Agreements as well as IOA. The group agreed that that "on the horizon technology" and low cost verification tools (that are not available yet) is what is needed to be able to track compliance.

Lunch

Update on Round Table at Hawai'i Island

Keith Lusk (FAA), Eric Lincoln (NPOAG Member)

Keith Lusk briefed the group on the continued interest in Hawaii in terms of air tours over the two national parks and noise impacts outside of the parks, primarily aircraft noise between the airport and Hawaii Volcanoes National Park (HAVO). An ATMP or Agreement wouldn't necessarily take into account the outside communities. FAA has experience working with local communities to get engagement around noise issues. Hawaii Department of Transportation (HDOT) is a partner currently running a community roundtable. In October 2018, HDOT formalized the group which included a couple



members of Hawaii Helicopter Association and two members from the local community (selected by HDOT). In October 2018 a meeting was held as a kickoff/formation meeting and the second one occurred in January 2019 (during government shutdown). The next meeting is scheduled for mid-June. Tiffany Chitwood is the FSDO manager and will attend for FAA. FAA is not a regular voting member of this organization and are there to provide technical advice. FAA would view the NPS as having a similar role.

Karen Trevino stated that the park superintendents in Hawaii are questioning why they were not invited to the meeting. Keith Lusk responded that HDOT runs the roundtable and FAA has suggested that NPS participate. Karen pointed out that it seems the focus has shifted from being park-focused to more of a statewide effort. Eric Lincoln mentioned that in the first series of meetings there were six people – seven including FAA (two DOT representatives, two citizen representatives, two operators, and Tiffany from FAA). Eric said that the intention in the original meeting was to deal with community associations to keep the meeting from growing to 100 people. Rather, invite specific people to make presentations to the roundtable to provide specific information, and not have it turn into a meeting requiring participation from across the entire state.

John Eastman asked if there had been any metrics or science around reducing noise. Eric responded that there is no way to reduce noise impact by significant amounts. Eric did say that building relationships between operators and community members is beneficial and helpful.

Ray stated that part of the challenge that NPS faces is the differentiation between park-specific issues vs. effects of communities around parks. As tempting as it is to disentangle the two, these flights are going to the parks. The tool to help with this is the NPATMA. The public sees NPATMA as the mitigation tool for this issue.

Les Blomberg suggested that Hawaii Parks be added back to the parking lot for future meetings.

Post-Agreement Treatment of Non-Participating Operators

Discussion

Vicki Ward started the discussion by stating that the NPATMA requires an Agreement or ATMP for all parks with over 50 tours. When the Agreement provision came in, NPS talked to its solicitors, and the feedback from solicitors was that operators could sign individual Agreements. This didn't have to happen all at once. Unless all the operators all signed onto an Agreement, the agencies still needed to do an ATMP or Agreement. For Glen Canyon, seven of the nine operators came to the first meeting, and seven operators signed onto an Agreement. One operator dropped out after two meetings and one never participated. NPS continued outreach, and every time NPS scheduled a meeting the operator did not attend. There was another operator who hasn't reported any air tours since reporting started and never responded to invitations to participate. NPS needs to get the two operators into an Agreement or do an ATMP. NPS would like feedback from NPOAG on how to deal with these operators given that we still have to meet the requirements of the NPATMA for GLEN/RABR and other parks for future planning efforts if this issues arises.

Karen Trevino said that having an operator who is not participating in an Agreement when all the other operators are is a real disservice to the operators who are participating. It creates a management problem. Karen said from her perspective there are four options: 1. Revoke the IOA completely; 2. Modify their existing ops specs to include the conditions and flight parameters other operators have agreed to; 3. Do an ATMP; 4. Do nothing.

Dick Hingson asked how many flights these two non-participating operators represent. Karen Trevino responded that it is a few hundred out of about 8,000.



The operators in the room responded that it is very frustrating when you have someone who doesn't play by the rules when everyone else is. They don't want anybody not compliant with the rules. There has to be a commitment of enforcement. Karen Trevino stated that in the case of Glen Canyon, there is nothing for NPS to enforce because the operator is not a signatory on an Agreement, so he isn't violating that. Eric Lincoln suggested IOA modification or other available tools to lowering their IOAs or revoking it completely in these situations.

John Eastman asked about data reporting from the operator. Vicki Ward said that the operator is sending in reports but there are concerns that they aren't reporting all the flights. That's the allegation.

Carl Slater asked if the FAA and NPS seek enforcement through the Agreement, can an operator leave the Agreement. Karen Trevino confirmed that yes, they can, and that is a problem.

Carl Slater suggested an ADS-B requirement for all. Melissa Rudinger said that the vast majority of airspace is non-ADS-B required air space. Many of those areas are in national parks, and that there is not a requirement.

Carl Slater, speaking specifically to Glen Canyon and Rainbow Bridge, stated that Agreement accommodations and protections for Navajo Nation is important, and it is deeply concerning that there is a rogue operator not following the rules. Someone needs to be addressing this issue. Protection of this area and this issue of a rogue operator is incredibly important to Navajo people and other tribes in the area.

Rob Smith stated that it seems like IOA modification could be an effective tool if it can be implemented. The playing field needs to be leveled out and the government is responsible for doing that. This should be coupled with a move toward actively trying to do ATMPs.

Matt Zuccaro stated that the system is broken, and it gives free reign to bad players. There has to be revision to the enforcement element. We need a conversation geared toward that.

Melissa Rudinger said that, to her, it seems there are two ways to get a change if there isn't a regulatory mechanism: petition for rule making or legislation.

Kevin Welsh (FAA) said that the FAA is committed to work on this issue, but resources are not unlimited. Prioritizing issues and the use of resources will be important for the agency to engage effectively in the long term..

Fly Neighborly (See Appendix G for PDF)

Vicki Ward (NPS)

Vicki Ward discussed the Fly Neighborly noise abatement recommendations. She discussed the application of these recommendations in the context of Agreements/plans and park administrative flights. NPS has been doing outreach to get feedback, including presenting the topic to its National Aviation Advisory Group. The goal is to get a couple candidate parks and operators to help collect some data during a flight to create some animations. NPS does have a couple parks with administrative flights that are interested in data collection. NPS hasn't had any parks with air tours and operators offering – they likely want to see how it works with administrative flights.

Matt Zuccaro stated that these recommendations are more embedded in local operating groups. It can be difficult to get this kind of information absorbed at HELI Expo because there is just so much information there on other topics. HAI has arrangements with FAA and their WINGS program to help operators keep building points up toward recertification. There are only so many tools in the toolbox that affect noise. You can change altitude and change aerodynamics, but the industry is hitting limitations on how to get these vessels quieter. If you hear noise, you usually aren't hearing the engine, but rather, the



aerodynamics of how the air is interacting with the aircraft. This has been a very successful program, but the data is important. We want concise data to drive these initiatives – not anecdotal or legislative.

Eric Lincoln, Blue Hawaiian, stated that his entire staff is required to take the course and FAA's course.

Karen asked Eric how to encourage other companies to do that. Vicki stated that the issues come when they aren't part of an HAI affiliate.

Les Blomberg inquired about flight tracks, stating that flight tracks/routes are perhaps the most important data – data we don't have yet. Matt responded that they want to be proactive by being smart in planning our flights. IF something comes up and becomes a sensitive area, then the appropriate studies need to be done to guide future routes/flight patterns.

Revisiting ATMPs

Keith Lusk (FAA), Vicki Ward (NPS)

Karen Trevino began by explaining that she had reached out to FAA to discuss changes that have occurred since the 2012 amendments that might address previous issues agencies had in the development of ATMPs. She felt that some of those things were important enough that it might be worthwhile to revisit doing ATMPs again. When work began on those amendments, it was unknown that 2/3 of the IOA that exists was overstated and not being used. That is known now because of the 5+ years of reporting information that has been acquired. The working relationship between FAA and NPS is different than it was 10 years ago, and both of the agencies have committed to revisiting this issue. One of the things the agencies are probably going to start with is looking at the old ATMP implementation plan. The agencies weren't able to finish that. One of the big things that has changed is that both agencies have had changes to their respective NEPA implementing regulations.

Eric Elmore commented that the most important point is that the relationship between the agencies has greatly improved over time. He feels like the lack of success shouldn't lead the agencies to not try to be successful now. FAA committed to going back and looking at changes that have occurred and seeing how feasible it is to be successful in doing an ATMP and having the tools allowed under NPATMA. The agencies committed to regular bi-weekly calls, a review of the implementation plan, review of ATMPs not completed, and seeing if there are more things agencies could use to make ATMPs feasible and successful.

John Eastman suggested that as the agencies identify areas where they can move forward with an ATMP. Perhaps any agreements can be memorialized as part of the ongoing lawsuit. Eric said that agencies responses would be coordinated by legal departments and DOJ.

Rob Smith asked who initiates the ATMP and inquired how it is ensured that park resources are taken into account. The agencies are looking at what has been done before so as to not start from scratch. The agencies can look at Mount Rushmore to see what works from that process. Karen followed up that the law is clear that the agencies have to do this jointly. The FAA is lead agency and NPS is cooperating agency.

Ray Sauvajot said that in all these activities it is both by law but by intention that the agencies work together. There is a lot more open conversation about the challenges, issues and constraints. Initiation of an ATMP has to be a joint decision because the resolution has to be a joint resolution.

Break

Public Comment



Members of the public were given the opportunity to use two to five minutes each (based on the number of commenters) to address NPOAG and the agencies. Written comments were also accepted though none were submitted at the meeting. One written comment was submitted prior to the meeting (*Appendix L*).

One comment from Jake Tomlin, Grand Canyon Scenic Airlines: Jake commented on the compliance issue. He suggested making incentives so great that the one or two operators would want to join any Agreement. He suggested holding people to IOAs, expanding flight windows, different kinds of partnership with local national parks, packaging a product for visitors with operators, etc. He and his company make a great effort to learn the area and the sites. He suggested more creativity towards positive reinforcement. There are a lot of tools that could be used. He stated that Grand Canyon Scenic Airlines gave up 2,000 IOA to go into a voluntary agreement. There really wasn't an incentive but they wanted to move it along.

In regards to the letters to operators to give up unused IOA, Jake is cautious to do that. All it takes is one regulatory change to shift flight demand and travel patterns to make giving up IOA regrettable.

END OF DAY 1



DAY TWO

Streamlining Air Tour Agreement Process (See Appendix H for full presentation)

Keith Lusk (FAA)

Keith presented the Voluntary Agreement process, VAs completed, and VAs in process. He discussed challenges tied to the length of time it takes to complete VAs, several lessons learned and suggestions for streamlining the agreement process. See the attached presentation for details on the presentation.

Keith asked operators in the room what suggestions or feedback they had. Some saw Glen Canyon agreement a success for the NPS, FAA, and operators. There was lots of give and take on each side, and it is a living document that will change as trends and resources change. It is believed that a key to the success of the agreement lies with the superintendent of Glen Canyon. He is a member of the community and understands the importance of tourism to Page and protecting resources. Everyone was cautious when it started, and he broke down the fences to come to agreement. ATMPs take a lot of time and a lot of money and you accomplish the same thing under the VA. You have to go into the process with an open mind. Another operator in the room confirmed this and said that consistency of those involved was important and it built trust. There was also an openness to having tribal concerns and cultural concerns addressed.

Carl Slater asked how many tribes were involved in Glen Canyon agreement. Vicki Ward responded that six or seven were involved. They met with them twice and received feedback from the tribes. The tribes wanted to see drafts and specific documents. The vibration study was done at request from the tribes. Carl asked if the FAA has a consultation policy and how would it get triggered in this process. Keith Lusk responded that the FAA has an order to implement consultation procedures - early and often. Vicki Ward said that the language in the NPATMA requires NPS and FAA to provide public review of agreement and to consult with tribes.

Les Blomberg asked if a training or packet of materials was available for superintendents on how to best work through this process. Vicki Ward responded that the NPS has a packet of materials for a kickoff/orientation about the agreement process, along with other materials.

Adam Beeco stated that there is a lessons learned portion of the handbook, and the superintendent of Glen Canyon spoke to the NPS Air Tour Advisory Council about his experience.

Rob Smith suggested that perhaps something to add to incentives to participate is that you can't renew your license unless you agree to the terms, or some other more carrot-like incentives.

NPOAG 15-Year Review (See Appendix I for full presentation)

Bryant Kuechle (TLG)

Bryant gave an overview of the NPOAG Assessment. This included a review of documents and materials related to the history of NPOAG, interviews with members, and an in-depth review of key themes and recommendations/next steps for NPOAG. *See full presentation in the appendix for more details.* Bryant asked for discussion and thoughts from the group, and said that the input today on the assessment will be captured in an appendix to the assessment report. The document won't be changed.

Les Blomberg stated that he appreciated the recommendations in the document, although he felt like the history was the part that was lacking. He wanted to better understand the specifics of the conflict between the agencies, and stated that this is critical to understanding the NPOAG group. The disagreements are the central issue. Adam Beeco said that more documents have been found and more can be added to the report.



John Eastman suggested putting together a table that outlines the different issues, perspectives and areas of agreement. He also suggested exploring how to prioritize parks for ATMPs, perhaps working toward accomplishing ATMPs for parks with less active air tours, having that be a model for success to try and replicate in more difficult parks.

Rob Smith stated that he felt there were some unanswered questions – “Why are we doing this? What are we managing for? Why was there a NPATMA? What is the goal? What resources are we trying to protect?” NPOAG came out of an act that was a means to an end. Prior to the meeting Rob Smith also provided the following comments via email:

- *Exec summary*
 - *Suggest including reference to the 1987 National Parks Overflights Act as part of the history of this effort to resolve concerns of air tour noise over national parks. <https://www.nps.gov/grca/learn/nature/upload/PL100-91.pdf> While the life of the NPOAG goes back to 2000, the issue predates it for the NPS and FAA work on trying to jointly identify and resolve these issues. Lack of progress led to the 2000 NPATMA.*
 - *Re “NPOAG has proven to be a valuable resource for implementing the Act” – this suggests more progress on outcomes than the record shows, in my opinion. NPOAG may have done its job of providing guidance and being a forum for discussion, but the unspoken part here is that no air tour management plans and only a couple of voluntary agreements have been achieved in nearly two decades. I suggest noting the slow progress and large amount of unfinished business remaining. The list of parks with significant air tour issues hasn’t decreased.*
- *Background and Overview*
 - *“The primary difference between an ATMP and an Agreement is that an Agreement can be done without a NEPA process”. This may be a difference, but I would say the primary difference is that an ATMP is enforceable while an Agreement is not. That’s the underlying reason for the NEPA distinction. It’s not the existence of an environmental law, it’s the absence of one which makes a difference in the process. And I’m not sure how significant it is if the score is still 0-2 ATMP v. Agreement when dozens of parks need to be dealt with after almost 20 years. Don’t blame NEPA.*
- *NPOAG membership*
 - *“Tribes will not likely respond to the request for a representative in the Federal Register but need to be approached directly”. I suggest rephrasing this to recognize that tribes are sovereign entities warranting a government to government approach for consultation and participation.*
- *Not mentioned but should be added*
 - *Lack of a management standard – a key problem, in my opinion, is the lack of a clear standard to which to manage for natural quiet at national parks. This leaves it to agencies to try to resolve despite conflicting missions. It means that agreements are political and not resource-based, and that plans don’t happen. Only the Grand Canyon has a standard of any kind – substantial restoration of natural quiet – and even that was overridden by political moves. The other parks have no target condition to reach. This should be recognized as a problem because it does not give the agencies anything to manage.*

Melissa Rudinger referenced a process she went through in 2010 to set priorities, and felt it could be replicated here.



Matt Zuccaro said that, historically, the frustration has been that what we're doing today we've done multiple times before. From his perspective outside the agencies, this doesn't work unless we zero in on a specific project or issue. Give NPOAG the data and the group can roll up our sleeves and dig into the issues. This isn't about prohibiting air tours. This is about mitigating the affect the tours have on the park to the best of our ability with technology, Fly Neighborly, and other things. Matt suggested giving NPOAG the ability to do the work to help the agencies. Over the years, Matt has felt that NPOAG was just receiving information. He doesn't feel like they have worked to come up with solutions to problems.

Bryant Kuechle said that he would fold in the feedback from the group and finalize the assessment. Then, he would work with FAA and NPS to discuss implementation of recommendations.

Tracking Aircraft Using ADS-B (See Appendix J for full presentation)

Adam Beeco (NPS)

Adam Beeco reviewed the ADS-B technology including what it can track, its limitations, and implementation of the technology. He showed several graphics and maps that illustrated the type of information that can be collected via ADS-B. The data showed only helicopter data – no fixed-wing data. Adam stated that they are looking to the private sector to assist in these processes. Eric Lincoln remarked that the data shown over Haleakala National Park (HALE) was mostly his aircraft. He talked about how the terrain can mask some of the data or make it unavailable.

Keith Lusk asked Eric Lincoln if the agreement from 1998 is a living document, and if they meet with HALE to talk about how it is going. Eric said that the park is good about communicating with operators, although that communication seems to have decreased in the last few years. He said that the ADS-B helps him enforce the agreement with his operators. He remarked that the ADS-B is a great tool, and even if there is some error, it is still showing significant information regarding impacts. Adam Beeco said that they chose this area in Hawaii to test ADS-B because it is very near Class-B airspace, so NPS anticipates every aircraft eventually having ADS-B in this area. It's different in other parks, like Glacier. Eric said that the agreement also contains information on endangered species and habitat. He is notified and avoids hatching areas and sensitive areas with endangered species.

Adam Beeco stated that one private sector company NPS has talked with believes their radar and ADS-B data combined could serve a lot of NPS needs. NPS doesn't necessarily agree with that but are exploring avenues, such as a contract, to continue working with the company.

Matt Zuccaro said that technology, where it is present and working, is very valuable.

Adam Beeco remarked that NPS doesn't want five operators having different technologies with different types of data, requiring NPS to have to process all different types of data and data sets – that would require a lot of resources, so working with the private sector is important.

Melissa Rudinger remarked that if you are Universal Access Transceiver (UAT) (a type of ADS-B) equipped, there is an anonymous feature you can initiate, if the operator chooses.

FOIA Requests for Air Tour Reports (See Appendix K for full presentation)

Keith Lusk (FAA)

Keith reviewed the Freedom of Information Act (FOIA), why it exists, the coordination that takes place in regards to FOIA, and potential FOIA exemptions. Keith said that they have received some FOIA request for air tour reports, and one of the exemptions with those is FOIA exemption 4: "Trade secrets and commercial/financial information," which oftentimes applies to the air tour operators. Operators expressed concern over giving tail numbers, dates, times, and tour information of everything they do. It is



sensitive/competitive information. General information is ok, but a line-by-line account of what happens on a daily basis could give another operator a competitive advantage.

Vicki Ward asked how ADS-B tracking changes things, and with that, nothing would be private. Melissa Rudinger responded with ADS-B there are privacy concerns, but there is an avenue to get approval to be anonymous, which is something an operator can turn on and off.

Dick Hingson asked if there are business exposure concerns if there are questions about vehicle tours when people try to FOIA about ground transport. Adam Beeco responded that ground transport companies have to enter into a Commercial Use Authorization with the park. With that, the park can put in the contract that data will be public, so if an operator signs onto that, then it would be public.

NPOAG INPUT

Group Discussion

Bryant asked for member remarks on the two days of meetings. While gathering remarks, Bryant reviewed and updated the action items and topics that were captured throughout the meetings.

Rob Smith said that he was impressed that there is an area of consensus to deal with the IOA issue in a way that rewards and encourages operators and discourages rogue participants. He would like further progress on identifying the goal for the ATMPs, specifically, the responsibilities and end results so there have a target for something to manage tours.

Melissa Rudinger remarked that it seems like the agencies are getting to a tipping point to get some traction on agreements. A prioritized list of parks is needed. She reiterated the need to incentivize participating operators and discourage rogue operators.

John Eastman advanced the idea of subcommittees, focusing them on the key recommendations from the assessment. He suggested aligning subcommittees to specific bullet points and have them then make recommendations to the board and NPS/FAA. He stated the importance of building expectations around timelines to get more information or advance goals toward some kind of measurable accomplishment. John also discussed getting feedback regarding selecting exempt parks, or parks requesting to be withdrawn from the exempts list, to get a plan in place. That would be a great milestone for NPOAG.

Matt Zuccaro agreed with statements about incentives. Incentivizing is more appealing than penalizing or regulating. He said that subcommittees are also a good idea. He thinks that on a case-by-case basis, there ought to be an assignment for the NPOAG to deliberate and come back with a structured recommendation. That would be preceded with a presentation on the issue. To make that successful, it is important make sure we have meetings that we have all the presentations and materials ahead of time, so we can review and give them consideration.

Les Blomberg stated that routes and enforcement are two things NPOAG can work on. For the modeling and enforcement, knowing the routes is important.

Dick Hingson expressed concern regarding some of the data presented. Specifically, he was concerned that both Glacier National Park and Bryce Canyon National Park had set a record number of air tours in the third quarter of 2018. He restated his suggestion of creating some data points that show intensity by acreage. He also suggested a framework be developed regarding how to analyze the data and how it can be used for a park prioritization effort.

Carl Slater expressed concern regarding the enforcement issues and potential harm to Rainbow Bridge and anywhere that could have adverse impact to cultural properties. It is native land no matter who holds the title. The voices and concerns of tribal concerns should be heard. Carl expressed skepticism on incentivizing, and asked how NPS and FAA can do something legally if operators are not doing anything



wrong by not using agreements. If NPOAG is operating by developing consensus ideas, NPOAG can have something more official that could drive policy. That would be a valuable tool, and to produce something like that the group needs an NPOAG caucus that does not have the federal workers in the room. Carl also stated that there are 573 federally recognized tribes in the US and hundreds more state-recognized tribes. Carl said that thought needs to be given to if there are economically depressed areas that need tour operators, but at the same time, there needs to be deference to what is prioritized as sacred or culturally significant.

Eric Lincoln feels that there has been a major step forward in the communications of working through agreements. Having a dialogue between parks and operators that is ongoing before the process starts is vital. That brings a lot of understanding of the players and the concerns in a particular location.

Keith Lusk appreciated everyone's time, guidance and input. He said he understood the need from the group to be more involved and delivering solutions and results.

Karen Trevino expressed thanks to Vicki Ward, Adam Beeco, Brent Lignell, and Keith Lusk for the preparation and planning of the meeting.

FIELD TRIP

NPOAG and the Agencies were provided the opportunity to tour the Grand Teton National Park. The group left the Craig Thomas Discovery Center at approximately 12:30 p.m. and arrived back about 4:30 p.m.



APPENDICES

Appendix A: Attendees List and Meeting Sign-In Sheet

Appendix B: Agency Updates Presentation

Appendix C: 2018 NPOAG Action Items and Suggestions

Appendix D: Air Tour Reporting Data Presentation

Appendix E: Air Tour Management Presentation

Appendix F: Enforcement and Compliance Framework Presentation

Appendix G: Fly Neighborly PDF

Appendix H: Streamlining Air Tour Agreement Process Presentation

Appendix I: NPOAG 15-Year Review Presentation

Appendix J: Tracking Aircraft Using ADS-B Presentation

Appendix K: FOIA Request for Air Tour Reports Presentation

Appendix L: Written Public Comment from Friends for a Quiet! Glacier

Appendix M: Public Comment Sign-In Sheet

Appendix N: Agenda



Appendix A: Attendees List and Sign-In Sheet

Agency Personnel		
Name	Title	Agency
Ray Sauvajot	Associate Director, Natural Resource Stewardship and Science	NPS
Adam Beeco	Social Scientist and Overflights Planner	NPS
Brent Lignell	Overflights Planner	NPS
Vicki Ward	Overflights Program Manager	NPS
Karen Trevino	Division Chief, Natural Sounds and Night Skies	NPS
Keith Lusk	Program Manager, Special Programs Office	FAA
Raquel Girvin	Regional Administrator, Western-Pacific Region	FAA
Monica Buenrostro	Aviation Safety Inspector, Flight Standards Part 135 Air Carrier Operations Branch	FAA
Kevin Welsh	Executive Director, Office of Environment and Energy (AEE)	FAA
Eric Elmore	Senior Policy Advisor, AEE	FAA
Jen Papazian		DOT
NPOAG Members		
Name	Affiliation	
John Eastman	Jackson Hole Airport Board	
Melissa Rudinger	Aircraft Owners and Pilots Association	
Carl Slater	Navajo Nation	
Les Blomberg	Noise Pollution Clearinghouse	
Rob Smith	National Parks Conservation Association	
Dick Hingson	Sierra Club	
Alan Stephen (phone)	Grand Canyon Airlines	
Eric Lincoln	Blue Hawaiian Helicopters	
Matt Zuccaro	Helicopter Association International	
Members of the Public		
Name	Organization	



Jake Tomlin*	Grand Canyon Scenic Airlines
John Becker	Papillon Helicopters
D. Zuccaro	Helicopter Association International Guest
Dave Coyle	Fly Jackson Hole
Mark Schlaefli	Sundance Helicopters

*Signed in to provide public comment.

SIGN-IN SHEET

National Parks Overflights Advisory Group Meeting and Field Trip
 Meeting – Tuesday and Wednesday, May 14-15, 2019
 Craig Thomas Discovery and Visitor Center, 1 Teton Park Road, Moose, WY, 83012 | Room: Director's conference

Name (Please print or write clearly)	Title/Representing	Email	Phone
DANUEL GIERVIN	FAA	reguel-girvin@faa.gov	424 405 7000
Dick Hingson	Sierra Club - NPOAG	dhingson@infowest.com	928-699-8366
Les Blumberg	NPC	lew@nprcc.org	802-279-1774
JAKE TOMLIN	PRESIDENT GRAND CANYON AIRLINES	JAKE@FLYGC.A.COM	702-638-3279
Drew Zuccaro	HAI Guest		
DAVE COYCE	Fly Jackson Hole	dcoyle@wyoming.com	307-690-6659

SIGN-IN SHEET

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Name (Please print or write clearly)	Title/Representing	Email	Phone
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SIGN-IN SHEET

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Name (Please print or write clearly)	Title/Representing	Email	Phone
Ray Sauvajot	Associate Director Natural Resource Stewardship & Science NPS	ray_sauvajot@nps.gov	202-354-6992
Karen Trevino	Division Chief, Natural Sands & Night Skies	karen_trevino@nps.gov	970-988-8884
Vicki Ward	Overflights Program Manager Natural Sounds & Night Skies NPS	vicki_ward@nps.gov	970-267-2117
Eric Lincoln	Air Tours	elincoln@blueharbour.com	808-280-4242
Carl Slater	Blue Hawaiian Helicopters Native American Tribes (Naup's Nation)	Carl Slater - Energy@nps.gov	(928) 318 4896
Adam Belco	National Park Service	adam_belco@nps.gov	
Brent Lignell	NPS	brent_lignell@nps.gov	970.225.3580
Jan Papacian	Utah Cent - DOT	janmki.papacian@dot.gov	607-494-3913



Appendix B: Agency Updates Presentation

National Parks Air Tour Management Program



**Federal Aviation
Administration**



**National Park
Service**

National Parks Overflight Advisory Group (NPOAG)

Presented to: NPOAG, Jackson, WY

By: FAA and NPS

Date: May 14, 2019



NPOAG Background

- **National Parks Air Tour Management Act of 2000 (NPATMA) required FAA and NPS to establish the advisory group**
- **Advisory group shall be composed of a balanced group of representatives from:**
 - General aviation;
 - Commercial air tour operations;
 - Environmental concerns; and
 - Indian tribes
- **The NPOAG provide advice, information, and recommendations to the FAA/NPS:**
 - (1) on the implementation of NPATMA;
 - (2) on commonly accepted quiet aircraft technology for use in commercial air tour operations over a national park or tribal lands, which will receive preferential treatment in a given air tour management plan;
 - (3) on other measures that might be taken to accommodate the interests of visitors to national parks; and
 - (4) at the request of the Administrator and the Director, safety, environmental, and other issues related to commercial air tour operations over a national park or tribal lands.



NPOAG Charter

- **FAA Order 1110.138A, constitutes the charter for the NPOAG**
- **Order identified composition of NPOAG as:**
 - One member General Aviation
 - Three members commercial air tour operators
 - Four members environmental concerns
 - Two members Native American tribes
- **Terms of office are 3 years, individuals may serve more than one term**
- **Notification for NPOAG openings and applicants published in Federal Register**
- **NPOAG to meet at least one time a year, notice of meetings published in Federal Register, meetings of the NPOAG open to the public**
- **Chairperson of meeting responsible for preparing report of the proceedings of each meeting**



Lobbying Restrictions

- **A Presidential Memorandum, dated June 18, 2010, directed agencies in the Executive Branch not to appoint or re-appoint federally registered lobbyists to advisory committees and other boards and commissions**
- **In compliance with the Presidential Memorandum, the Office of Management and Budget (OMB) issued guidance to implement this policy**
- **The Presidential Memorandum and the (OMB) guidance apply to the NPOAG.**
- **Members will need to validate they are not federally registered lobbyists**



Current NPOAG Membership

NPOAG Member	Employer or Interest Group	Representing	Start of Term	End of Term
Vacant	TBD	Native American Tribes	TBD	TBD
Carl Slater	Navajo Nation	Native American Tribes	2/19/2019	2/18/2022
Alan Stephen	Grand Canyon Airlines	Air Tour Operators	2/19/2019	2/18/2022
Matthew Zuccaro	Helicopter Association International	Air Tour Operators	9/10/2016	9/9/2019
Les Blomberg	Noise Pollution Clearinghouse	Environmental Concerns	9/22/2017	9/21/2020
Rob Smith	National Parks Conservation Association	Environmental Concerns	7/5/2016	7/4/2019
Melissa Rudinger	Aircraft Owners and Pilots Association	General Aviation	4/4/2019	4/3/2022
Eric Lincoln	Helicopter Consultants of Maui	Air Tour Operators	7/31/2018	7/30/2021
John Eastman	Jackson Hole Airport Board	Environmental Concerns	9/22/2017	9/21/2020
Dick Hingson	Sierra Club	Environmental Concerns	9/22/2017	9/21/2020





Appendix C: 2018 NPOAG Action Items and Suggestions.



National Parks Overflights Advisory Group Meeting and Field Trip SUMMARY REPORT

Meeting - Tuesday, September 18, 2018
Field Trip - Wednesday, September 19, 2018

Hilton Garden Inn
1340 West Warm Spring Rd.
Henderson, Nevada 89014

ACTION ITEMS for the National Park Service (NPS) and Federal Aviation Administration (FAA), aka “the Agencies”

1. Send information about the FAA Reauthorization Act of 2018 as it relates to NPATMA. (NOTE: the bill was signed by the President on October 5. It does not contain the transportation route amendment.) Send the update to NPOAG.
2. Send guidelines out to NPOAG about restrictions on members being registered federal lobbyists.
3. Send link out to NPOAG with the Glacier Air Tour Noise Modeling Report, when available.
4. Email out the Whitlow opinion that discusses how IOA is not a property right. - **COMPLETE**
5. Continue exploring use of Commercial Use Authorization (CUA) as part of compliance of Agreements.
6. Continue to pursue NPATMA and Air Tour Management Agreements (Agreements) handbooks and provide an update at the 2019 meeting.
7. Email out Flight Standard Information, 8900.1
(<http://fsims.faa.gov/PICResults.aspx?mode=EBookContents&restricttcategory=all~menu>) - keep NPOAG informed about updates from FAA. - **COMPLETE**
8. Provide ADS-B update (Phase 3 of pilot study) for next meeting.

SUGGESTIONS FOR CONSIDERATION for the Agencies

1. Review Glen Canyon/Rainbow Bridge Air Tour Management Agreement in approximately one year to see how it is working.
2. Request to create a separate reporting bar chart to show annual trends that does not include New York Harbor Parks.
3. Request to see the closest approach to Muir Woods and a map of where the flights are traveling.
4. Request for more frequent updates, beyond what is currently provided annually, regarding operator-specific data for Hawaii Volcanoes, Great Smoky Mountains, and Glacier.
5. Consider providing different (not specified) information in the annual reports to show a clearer picture of tour flight activity.
6. Consider not using tail numbers in reporting when aircraft are added and deleted so frequently.
7. Consider increasing public involvement in Agreement processes and in follow-up meetings. Specifically, in reference to including the public in follow-up meetings with operators about the Glen Canyon/Rainbow Bridge Agreement.
8. Consider geofencing with ADS-B technology.
9. Consider future focus on verification of self-reported data gathering (accuracy and completeness).
10. Consider providing Grand Canyon “spiked wheel” 2015, 2016, 2017 comparison by 12/31/18



11. Recommend FAA and NPS resolve NEPA issues to allow ATMPs as a viable air tour management option.
12. Consider using NPOAG more in advising NPS/FAA on their priorities in air tour management.
13. Consider “Day of Quiet” in national parks every week.
14. Proposal to meet on a nine-month or bi-annual meeting cycle and hold longer meetings but still avoid June-August.
15. Many of the issues discussed at this meeting are the same issues that have been discussed for many years but have seen little progress. Explore methods and ideas to increase efficiency and completion of issues related to NPATMA implementation.
16. Consider further discussion about how drones fit into the airspace over NPS units as a topic.
17. Location/Timing considerations for next meeting:
 - a. Alexandria, VA
 - b. Atlanta, GA (in coordination with Heli Expo, March 2019)
 - c. Jackson Hole
 - d. Hawaii
 - e. Denver or Fort Collins
 - f. Any park in the Agreement process/under discussion, such as Acadia
 - g. Consider timing with an Agreement milestone or at the front end of a process to help provide guidance.
18. Consider issue-specific NPOAG subcommittees.

APPENDIX LIST

Appendix 1: Attendees List and Sign-In Sheet

Appendix 2: NPATMA Proposed Amendments

Appendix 3: HAI Helicopter Noise Abatement Techniques Overview

Appendix 4: Tracking Aircraft Over NPS Units: A Proof of Concept Study Presentation

Appendix 5: Interim Operating Authority Cleanup Presentation

Appendix 6: Notice of Final Opinion on the Transferability of Interim Operating Authority Under NPATMA (Whitlow Opinion)

Appendix 7: Written Public Comment from Friends for a Quiet! Glacier

DAY ONE

Introduction to the People and Purpose of NPOAG

Tamara Swann (FAA), Keith Lusk (FAA), Vicki Ward (NPS), Bryant Kuechle (TLG)

Welcome: Tamara Swann, FAA Western-Pacific Region Deputy Regional Administrator, recognized and applauded partnerships among National Park Overflights Advisory Group (NPOAG), public attendance, and specifically Keith Lusk, FAA Special Programs Office Project Manager, for his continued participation with which he brings a wealth of historical knowledge. She thanked everyone for attending and hoped for a great meeting.



Appendix D: Air Tour Reporting Data Presentation



Reporting Information for Commercial Air Tour Operations over Units of the National Park System

PRELIMINARY DRAFT 2018 DATA

**Compiled for the National Parks Overflights Advisory Group Meeting
Grand Teton National Park, Wyoming
May 14-15, 2019**

National Park Service
NRSS / Natural Sounds & Night Skies Division / Overflights Program
Fort Collins, Colorado

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Table 1. Reported Commercial Air Tours in 2018 (Highest to Lowest Reported Tours)^A

National Park System Unit	Region	State	January-March	April-June	July-September	October-December	Total Air Tours	Interim Operating Authority / Agreement Authority ^B	Number of Operators with IOA or Agreement Authority
Hawai'i Volcanoes National Park (HAVO)	Pacific West	Hawaii	3,738	1,954	331	2,310	8,333	26,664	10
National Parks of New York Harbor Management Unit (NPNH)	Northeast	New York, New Jersey	1,845	2,275	2,480	1,541	8,141	35,532	3
Lake Mead National Recreation Area (LAKE)	Pacific West	Arizona, Nevada	1,732	2,015	2,145	1,509	7,401	36,819	7
Haleakalā National Park (HALE)	Pacific West	Hawaii	1,146	1,092	1,235	1,284	4,757	25,827	6
Glen Canyon National Recreation Area (GLCA)	Intermountain	Arizona, Utah	293	1,562	1,788	1,072	4,715	8,159 ^B	9
Mount Rushmore National Memorial (MORU)	Midwest	South Dakota	0	1,102	2,638	48	3,788	5,608	3
Golden Gate National Recreation Area (GOGA)	Pacific West	California	414	672	977	485	2,548	5,090	2
Badlands National Park (BADL)	Midwest	South Dakota	0	734	995	0	1,729	4,117	2
Rainbow Bridge National Monument (RABR)	Intermountain	Utah	109	607	638	172	1,526	3,992 ^B	7
San Francisco Maritime National Historical Park (SAFR)	Pacific West	California	167	292	446	212	1,117	5,090	2
Great Smoky Mountains National Park (GRSM)	Southeast	Tennessee, North Carolina	77	186	313	231	807	1,920	2
Bryce Canyon National Park (BRCA)	Intermountain	Utah	33	164	243	92	532	3,131	9
Canyonlands National Park (CANY)	Intermountain	Utah	1	100	154	59	314	665	8
Glacier National Park (GLAC)	Intermountain	Montana	5	36	215	42	298	1,653	5
Arches National Park (ARCH)	Intermountain	Utah	1	75	107	42	225	566	8
Point Reyes National Seashore (PORE)	Pacific West	California	39	51	36	25	151	5,090	2
Biscayne National Park (BISC)	Southeast	Florida	17	22	21	22	82	200 ^B	2
Bandelier National Monument (BAND)	Intermountain	New Mexico	0	19	33	24	76	126	1
Big Cypress National Preserve (BICY)	Southeast	Florida	39	15	2	9	65	972 ^B	2
Olympic National Park (OLYM)	Pacific West	Washington	5	10	40	9	64	76	1
Natural Bridges National Monument (NABR)	Intermountain	Utah	0	19	30	14	63	145	5
Everglades National Park (EVER)	Southeast	Florida	43	10	0	9	62	674	1
Big Bend National Park (BIBE)	Intermountain	Texas	—	—	—	—	48	55	2

National Park System Unit	Region	State	January-March	April-June	July-September	October-December	Total Air Tours	Interim Operating Authority / Agreement Authority ^B	Number of Operators with IOA or Agreement Authority
Chaco Culture National Historical Park (CHCU)	Intermountain	New Mexico	0	4	13	14	31	147	1
Canyon de Chelly National Monument (CACH)	Intermountain	Arizona	0	5	13	12	30	175	4
Aztec Ruins National Monument (AZRU)	Intermountain	New Mexico	—	—	—	—	27	83	1
Mesa Verde National Park (MEVE)	Intermountain	Colorado	—	—	—	—	27	63	1
Acadia National Park (ACAD)	Northeast	Maine	5	5	12	0	22	60	1
Hovenweep National Monument (HOVE)	Intermountain	Utah	—	—	—	—	20	92	3
Navajo National Monument (NAVA)	Intermountain	Arizona	—	—	—	—	19	267	4
Yosemite National Park (YOSE)	Pacific West	California	0	7	5	7	19	115	2
Petroglyph National Monument (PETR)	Intermountain	New Mexico	—	—	—	—	11	45	1
El Malpais National Monument (ELMA)	Intermountain	New Mexico	—	—	—	—	10	43	1
Devils Tower National Monument (DETO)	Intermountain	Wyoming	—	—	—	—	9	22	1
Pecos National Historical Park (PECO)	Intermountain	New Mexico	—	—	—	—	9	32	1
Zion National Park (ZION)	Intermountain	Utah	0	6	1	2	9	684	8
Fort Union National Monument (FOUN)	Intermountain	New Mexico	—	—	—	—	8	32	1
Yellowstone National Park (YELL)	Intermountain	Idaho, Montana, Wyoming	5	1	0	0	6	103	4
Black Canyon Of The Gunnison National Park (BLCA)	Intermountain	Colorado	—	—	—	—	5	7	1
Capitol Reef National Park (CARE)	Intermountain	Utah	0	0	3	1	5	284	7
Capulin Volcano National Monument (CAVO)	Intermountain	New Mexico	—	—	—	—	5	13	1
Colorado National Monument (COLM)	Intermountain	Colorado	—	—	—	—	5	57	1
Hubbell Trading Post National Historic Site (HUTR)	Intermountain	Arizona	—	—	—	—	3	27	1
Petrified Forest National Park (PEFO)	Intermountain	Arizona	—	—	—	—	3	60	3

National Park System Unit	Region	State	January-March	April-June	July-September	October-December	Total Air Tours	Interim Operating Authority / Agreement Authority ^B	Number of Operators with IOA or Agreement Authority
Sunset Crater Volcano National Monument (SUCR)	Intermountain	Arizona	—	—	—	—	3	94	4
Carlsbad Caverns National Park (CAVE)	Intermountain	New Mexico	—	—	—	—	2	18	1
Dinosaur National Monument (DINO)	Intermountain	Colorado, Utah	—	—	—	—	2	9	1
Great Sand Dunes National Park and Preserve (GRSA)	Intermountain	Colorado	—	—	—	—	2	16	1
Muir Woods National Monument (MUWO)	Pacific West	California	0	0	0	2	2	5,090	2
Salinas Pueblo Missions National Monument (SAPU)	Intermountain	New Mexico	—	—	—	—	2	17	1
El Morro National Monument (ELMO)	Intermountain	New Mexico	—	—	—	—	1	43	1
Mount Rainier National Park (MORA)	Pacific West	Washington	0	0	0	1	1	34	2
Rio Grande Wild and Scenic River (RIGR)	Intermountain	Texas	—	—	—	—	1	5	1
Sequoia and Kings Canyon National Parks (SEKI)	Pacific West	California	—	1	—	—	1	10	1
Wupatki National Monument (WUPA)	Intermountain	Arizona	—	—	—	—	1	60	3
Casa Grande Ruins National Monument (CAGR)	Intermountain	Arizona	—	—	—	—	0	6	1
Cedar Breaks National Monument (CEBR)	Intermountain	Utah	—	—	—	—	0	66	4
Coronado National Memorial (CORO)	Intermountain	Arizona	—	—	—	—	0	5	1
Death Valley National Park (DEVA)	Pacific West	California	0	0	0	0	0	37	4
Dry Tortugas National Park (DRTO)	Southeast	Florida	—	—	—	—	0	100	1
Fort Bowie National Historic Site (FOBO)	Intermountain	Arizona	—	—	—	—	0	5	1
Fort Davis National Historic Site (FODA)	Intermountain	Texas	—	—	—	—	0	5	1
Gila Cliff Dwellings National Monument (GICL)	Intermountain	New Mexico	—	—	—	—	0	26	1
Golden Spike National Historic Site (GOSP)	Intermountain	Utah	—	—	—	—	0	11	1
Grand Teton National Park (GRTE)	Intermountain	Wyoming	—	—	—	—	0	29	3

National Park System Unit	Region	State	January-March	April-June	July-September	October-December	Total Air Tours	Interim Operating Authority / Agreement Authority ^B	Number of Operators with IOA or Agreement Authority
Guadalupe Mountains National Park (GUMO)	Intermountain	Texas	—	—	—	—	0	18	1
Hohokam Pima National Monument (PIMA)	Intermountain	Arizona	—	—	—	—	0	5	1
Mojave National Preserve (MOJA)	Pacific West	California	—	—	—	—	0	15	1
Montezuma Castle National Monument (MOCA)	Intermountain	Arizona	—	—	—	—	0	180	3
North Cascades National Park (NOCA)	Pacific West	Washington	—	—	—	—	0	2	1
Organ Pipe Cactus National Monument (ORPI)	Intermountain	Arizona	—	—	—	—	0	5	1
Pipe Spring National Monument (PISP)	Intermountain	Arizona	—	—	—	—	0	26	2
Saguaro National Park (SAGU)	Intermountain	Arizona	—	—	—	—	0	18	2
Timpanogos Cave National Monument (TICA)	Intermountain	Utah	—	—	—	—	0	254	1
Tumacacori National Historical Park (TUMA)	Intermountain	Arizona	—	—	—	—	0	5	1
Tuzigoot National Monument (TUZI)	Intermountain	Arizona	—	—	—	—	0	57	2
Walnut Canyon National Monument (WACA)	Intermountain	Arizona	—	—	—	—	0	48	2
Yucca House National Monument (YUHO)	Intermountain	Colorado	—	—	—	—	0	63	1
Total ^C			9,714	13,041	14,914	9,250	47,143 ^C	180,964 ^B	47 ^D

- A. Dashes in table indicate the park is exempt from the requirement for operators to submit a quarterly report; therefore, only an annual report is required.
- B. Where parks have entered into air tour management agreements, the number takes into account the number of authorized flights in agreements. Absent agreements, the system-wide IOA is 187,420.
- C. Grand total exceeds sum of quarterly totals due to exempt parks where only the annual report is required.
- D. This number is not a sum of all numbers in this column since some operators have certificates for multiple parks. It reflects the number of unique certificates across all operators.

Table 2. Reported Commercial Air Tours in 2018 (Alphabetical by Park Unit) ^A

National Park System Unit	Region	State	January-March	April-June	July-September	October-December	Total Air Tours	Interim Operating Authority / Agreement Authority ^B	Number of Operators with IOA or Agreement Authority
Acadia National Park (ACAD)	Northeast	Maine	5	5	12	0	22	60	1
Arches National Park (ARCH)	Intermountain	Utah	1	75	107	42	225	566	8
Aztec Ruins National Monument (AZRU)	Intermountain	New Mexico	—	—	—	—	27	83	1
Badlands National Park (BADL)	Midwest	South Dakota	0	734	995	0	1,729	4,117	2
Bandelier National Monument (BAND)	Intermountain	New Mexico	0	19	33	24	76	126	1
Big Bend National Park (BIBE)	Intermountain	Texas	—	—	—	—	48	55	2
Big Cypress National Preserve (BICY)	Southeast	Florida	39	15	2	9	65	972 ^B	2
Biscayne National Park (BISC)	Southeast	Florida	17	22	21	22	82	200 ^B	2
Black Canyon Of The Gunnison National Park (BLCA)	Intermountain	Colorado	—	—	—	—	5	7	1
Bryce Canyon National Park (BRCA)	Intermountain	Utah	33	164	243	92	532	3,131	9
Canyon de Chelly National Monument (CACH)	Intermountain	Arizona	0	5	13	12	30	175	4
Canyonlands National Park (CANY)	Intermountain	Utah	1	100	154	59	314	665	8
Capitol Reef National Park (CARE)	Intermountain	Utah	0	0	3	1	5	284	7
Capulin Volcano National Monument (CAVO)	Intermountain	New Mexico	—	—	—	—	5	13	1
Carlsbad Caverns National Park (CAVE)	Intermountain	New Mexico	—	—	—	—	2	18	1
Casa Grande Ruins National Monument (CAGR)	Intermountain	Arizona	—	—	—	—	0	6	1
Cedar Breaks National Monument (CEBR)	Intermountain	Utah	—	—	—	—	0	66	4
Chaco Culture National Historical Park (CHCU)	Intermountain	New Mexico	0	4	13	14	31	147	1
Colorado National Monument (COLM)	Intermountain	Colorado	—	—	—	—	5	57	1
Coronado National Memorial (CORO)	Intermountain	Arizona	—	—	—	—	0	5	1
Death Valley National Park (DEVA)	Pacific West	California	0	0	0	0	0	37	4
Devils Tower National Monument (DETO)	Intermountain	Wyoming	—	—	—	—	9	22	1
Dinosaur National Monument (DINO)	Intermountain	Colorado, Utah	—	—	—	—	2	9	1

National Park System Unit	Region	State	January-March	April-June	July-September	October-December	Total Air Tours	Interim Operating Authority / Agreement Authority ^B	Number of Operators with IOA or Agreement Authority
Dry Tortugas National Park (DRTO)	Southeast	Florida	—	—	—	—	0	100	1
El Malpais National Monument (ELMA)	Intermountain	New Mexico	—	—	—	—	10	43	1
El Morro National Monument (ELMO)	Intermountain	New Mexico	—	—	—	—	1	43	1
Everglades National Park (EVER)	Southeast	Florida	43	10	0	9	62	674	1
Fort Bowie National Historic Site (FOBO)	Intermountain	Arizona	—	—	—	—	0	5	1
Fort Davis National Historic Site (FODA)	Intermountain	Texas	—	—	—	—	0	5	1
Fort Union National Monument (FOUN)	Intermountain	New Mexico	—	—	—	—	8	32	1
Gila Cliff Dwellings National Monument (GICL)	Intermountain	New Mexico	—	—	—	—	0	26	1
Glacier National Park (GLAC)	Intermountain	Montana	5	36	215	42	298	1,653	5
Glen Canyon National Recreation Area (GLCA)	Intermountain	Arizona, Utah	293	1,562	1,788	1,072	4,715	8,159 ^B	9
Golden Gate National Recreation Area (GOGA)	Pacific West	California	414	672	977	485	2,548	5,090	2
Golden Spike National Historic Site (GOSP)	Intermountain	Utah	—	—	—	—	0	11	1
Grand Teton National Park (GRTE)	Intermountain	Wyoming	—	—	—	—	0	29	3
Great Sand Dunes National Park and Preserve (GRSA)	Intermountain	Colorado	—	—	—	—	2	16	1
Great Smoky Mountains National Park (GRSM)	Southeast	Tennessee, North Carolina	77	186	313	231	807	1,920	2
Guadalupe Mountains National Park (GUMO)	Intermountain	Texas	—	—	—	—	0	18	1
Haleakalā National Park (HALE)	Pacific West	Hawaii	1,146	1,092	1,235	1,284	4,757	25,827	6
Hawai'i Volcanoes National Park (HAVO)	Pacific West	Hawaii	3,738	1,954	331	2,310	8,333	26,664	10
Hohokam Pima National Monument (PIMA)	Intermountain	Arizona	—	—	—	—	0	5	1
Hovenweep National Monument (HOVE)	Intermountain	Utah	—	—	—	—	20	92	3
Hubbell Trading Post National Historic Site (HUTR)	Intermountain	Arizona	—	—	—	—	3	27	1

National Park System Unit	Region	State	January-March	April-June	July-September	October-December	Total Air Tours	Interim Operating Authority / Agreement Authority ^B	Number of Operators with IOA or Agreement Authority
Lake Mead National Recreation Area (LAKE)	Pacific West	Arizona, Nevada	1,732	2,015	2,145	1,509	7,401	36,819	7
Mesa Verde National Park (MEVE)	Intermountain	Colorado	—	—	—	—	27	63	1
Mojave National Preserve (MOJA)	Pacific West	California	—	—	—	—	0	15	1
Montezuma Castle National Monument (MOCA)	Intermountain	Arizona	—	—	—	—	0	180	3
Mount Rainier National Park (MORA)	Pacific West	Washington	0	0	0	1	1	34	2
Mount Rushmore National Memorial (MORU)	Midwest	South Dakota	0	1,102	2,638	48	3,788	5,608	3
Muir Woods National Monument (MUWO)	Pacific West	California	0	0	0	2	2	5,090	2
National Parks of New York Harbor Management Unit (NPNH)	Northeast	New York, New Jersey	1,845	2,275	2,480	1,541	8,141	35,532	3
Natural Bridges National Monument (NABR)	Intermountain	Utah	0	19	30	14	63	145	5
Navajo National Monument (NAVA)	Intermountain	Arizona	—	—	—	—	19	267	4
North Cascades National Park (NOCA)	Pacific West	Washington	—	—	—	—	0	2	1
Olympic National Park (OLYM)	Pacific West	Washington	5	10	40	9	64	76	1
Organ Pipe Cactus National Monument (ORPI)	Intermountain	Arizona	—	—	—	—	0	5	1
Pecos National Historical Park (PECO)	Intermountain	New Mexico	—	—	—	—	9	32	1
Petrified Forest National Park (PEFO)	Intermountain	Arizona	—	—	—	—	3	60	3
Petroglyph National Monument (PETR)	Intermountain	New Mexico	—	—	—	—	11	45	1
Pipe Spring National Monument (PISP)	Intermountain	Arizona	—	—	—	—	0	26	2
Point Reyes National Seashore (PORE)	Pacific West	California	39	51	36	25	151	5,090	2
Rainbow Bridge National Monument (RABR)	Intermountain	Utah	109	607	638	172	1,526	3,992 ^B	7
Rio Grande Wild and Scenic River (RIGR)	Intermountain	Texas	—	—	—	—	1	5	1
Saguaro National Park (SAGU)	Intermountain	Arizona	—	—	—	—	0	18	2
Salinas Pueblo Missions National Monument (SAPU)	Intermountain	New Mexico	—	—	—	—	2	17	1

National Park System Unit	Region	State	January-March	April-June	July-September	October-December	Total Air Tours	Interim Operating Authority / Agreement Authority ^B	Number of Operators with IOA or Agreement Authority
San Francisco Maritime National Historical Park (SAFR)	Pacific West	California	167	292	446	212	1,117	5,090	2
Sequoia and Kings Canyon National Parks (SEKI)	Pacific West	California	—	1	—	—	1	10	1
Sunset Crater Volcano National Monument (SUCR)	Intermountain	Arizona	—	—	—	—	3	94	4
Timpanogos Cave National Monument (TICA)	Intermountain	Utah	—	—	—	—	0	254	1
Tumacacori National Historical Park (TUMA)	Intermountain	Arizona	—	—	—	—	0	5	1
Tuzigoot National Monument (TUZI)	Intermountain	Arizona	—	—	—	—	0	57	2
Walnut Canyon National Monument (WACA)	Intermountain	Arizona	—	—	—	—	0	48	2
Wupatki National Monument (WUPA)	Intermountain	Arizona	—	—	—	—	1	60	3
Yellowstone National Park (YELL)	Intermountain	Idaho, Montana, Wyoming	5	1	0	0	6	103	4
Yosemite National Park (YOSE)	Pacific West	California	0	7	5	7	19	115	2
Yucca House National Monument (YUHO)	Intermountain	Colorado	—	—	—	—	0	63	1
Zion National Park (ZION)	Intermountain	Utah	0	6	1	2	9	684	8
Total ^C			9,714	13,041	14,914	9,250	47,143 ^C	180,964 ^B	47 ^D

- A. Dashes in table indicate the park is exempt from the requirement for operators to submit a quarterly report; therefore, only an annual report is required.
- B. Where parks have entered into air tour management agreements, the number takes into account the number of authorized flights in agreements. Absent agreements, the system-wide IOA is 187,420.
- C. Grand total exceeds sum of quarterly totals due to exempt parks where only the annual report is required.
- D. This number is not a sum of all numbers in this column since some operators have certificates for multiple parks. It reflects the number of unique certificates across all operators.

Table 3. Reported Commercial Air Tours at High-Activity Units of the National Park System, 2018

Unit of the National Park System	January-March	April-June	July-September	October-December	Total Air Tours	Percent of All Air Tours	Number of Operators ^A
Hawai'i Volcanoes National Park (HAVO)	3,738	1,954	331	2,310	8,333	17.7%	7
National Parks of New York Harbor Management Unit (NPNH)	1,845	2,275	2,480	1,541	8,141	17.3%	2
Lake Mead National Recreation Area (LAKE)	1,732	2,015	2,145	1,509	7,401	15.7%	4
Haleakalā National Park (HALE)	1,146	1,092	1,235	1,284	4,757	10.1%	5
Glen Canyon National Recreation Area (GLCA)	293	1,562	1,788	1,072	4,715	10.0%	5
Mount Rushmore National Memorial (MORU)	0	1,102	2,638	48	3,788	8.0%	3
Golden Gate National Recreation Area (GOGA)	414	672	977	485	2,548	5.4%	2
Badlands National Park (BADL)	0	734	995	0	1,729	3.7%	1
Rainbow Bridge National Monument (RABR)	109	607	638	172	1,526	3.2%	4
San Francisco Maritime National Historical Park (SAFR)	167	292	446	212	1,117	2.4%	1
Total ^B	9,444	12,305	13,673	8,633	44,055	93.4%	24 ^A

A. This is the number of operators who reported at least one air tour. The total is not a sum of all numbers in this column since some operators have certificates for multiple parks. It reflects the number of unique certificates across all operators, and for which at least one tour was reported.

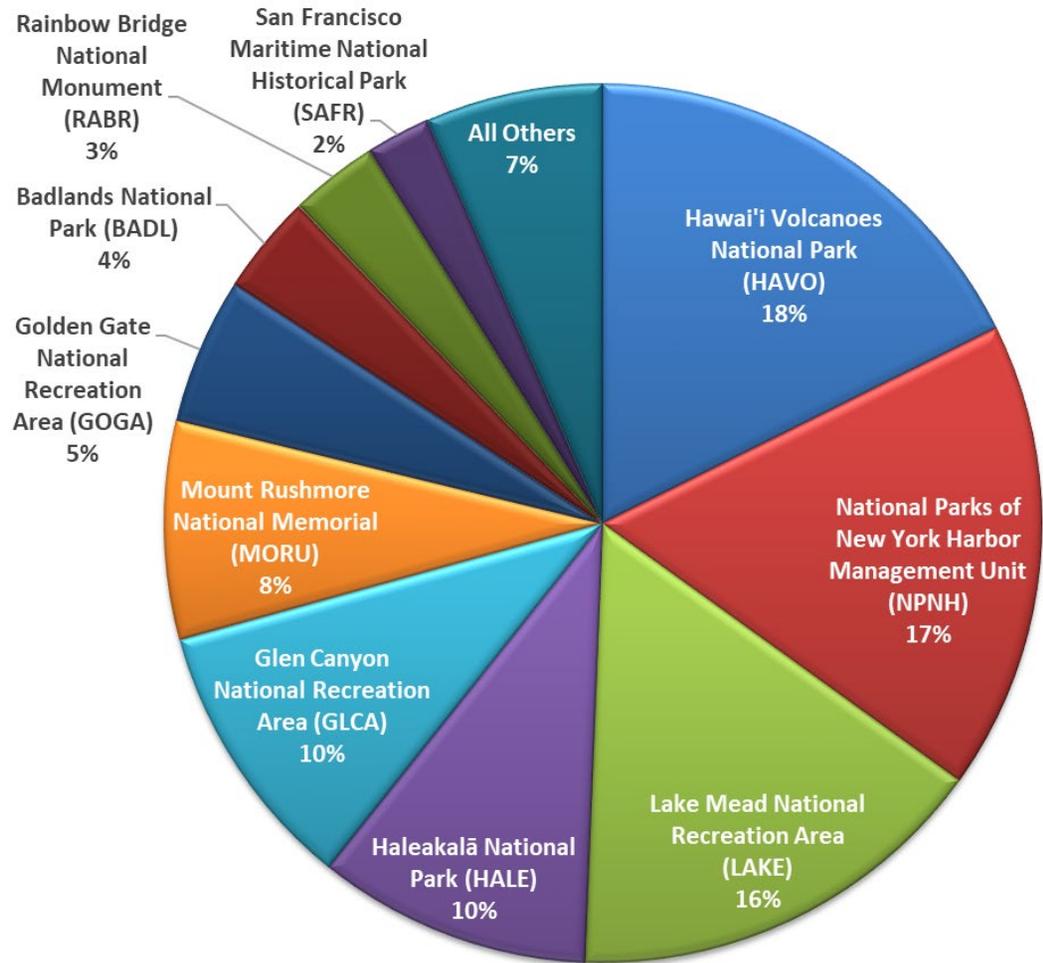


Figure 1. Reported Commercial Air Tours at High-Activity Units of the National Park System, 2018

Table 4. Reported Commercial Air Tours at High-Activity Units of the National Park System, 2013-2018

National Park System Unit	2013	2014	2015	2016	2017	2018
Hawai'i Volcanoes National Park (HAVO)	15,410	14,427	14,645	15,489	16,520	8,333
National Parks of New York Harbor Management Unit (NPNH)	34,682	39,797	26,812	18,638	11,006	8,141
Lake Mead National Recreation Area (LAKE)	13,218	12,160	10,548	7,530	8,735	7,401
Haleakalā National Park (HALE)	4,631	4,932	4,543	4,589	4,839	4,757
Glen Canyon National Recreation Area (GLCA)	4,437	4,861	4,167	3,820	4,243	4,715
Mount Rushmore National Memorial (MORU)	9	3,648	4,363	4,011	3,749	3,788
Golden Gate National Recreation Area (GOGA)	1,920	2,003	2,272	2,250	2,588	2,548
Badlands National Park (BADL)	962	1,317	1,205	1,330	1,194	1,729
Rainbow Bridge National Monument (RABR)	2,135	2,399	2,415	2,065	1,316	1,526
San Francisco Maritime National Historical Park (SAFR) ^A	— ^A	1,117				
Total	77,404	85,544	70,970	59,722	54,190	44,055

A. Tours likely occurred 2013-2017 in connection with tours over Golden Gate. FAA and NPS have clarified reporting with operator.

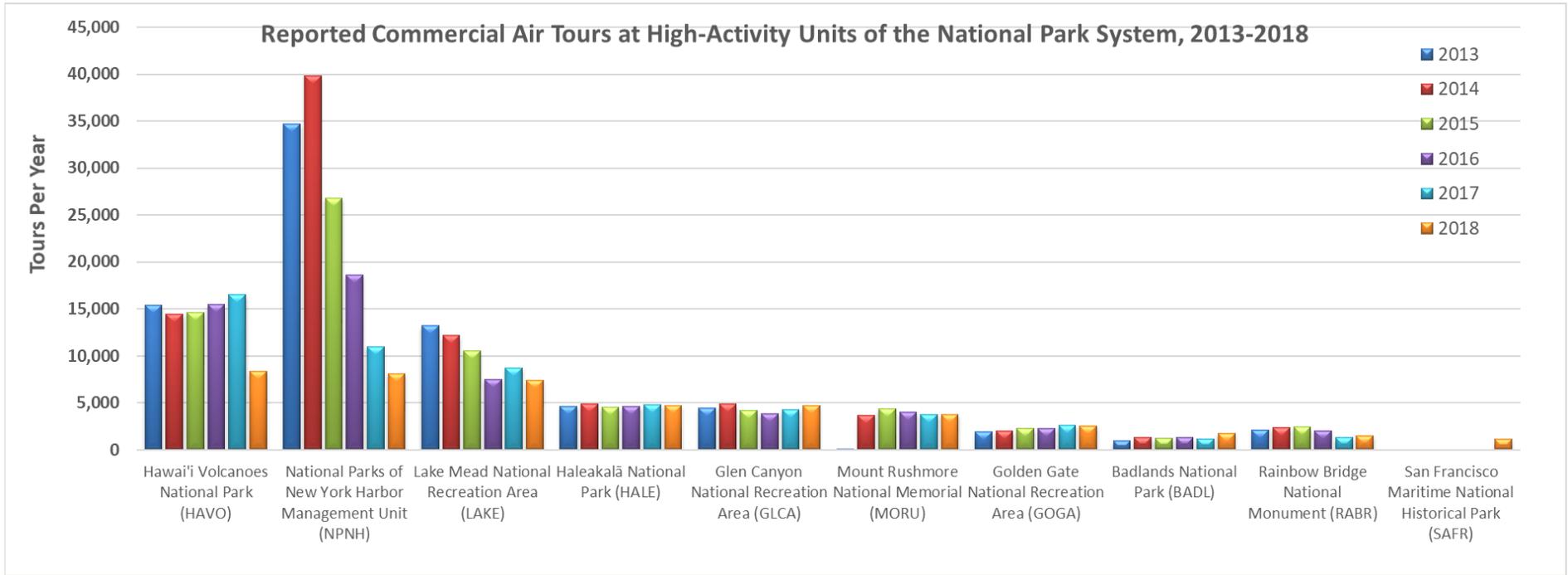


Figure 2. Reported Commercial Air Tours at High-Activity Units of the National Park System, 2013-2018

Table 5. Reported Commercial Air Tours by NPS Region, 2018

Region	Total Air Tours	Percent of All Air Tours	Number of Park Units with At Least One Tour
Pacific West Region (PWR)	24,394	52%	11
Northeast Region (NER)	8,163	17%	2
Intermountain Region (IMR)	8,053	17%	36
Midwest Region (MWR)	5,517	12%	2
Southeast Region (SER)	1,016	2%	4
Total	47,143	100%	55

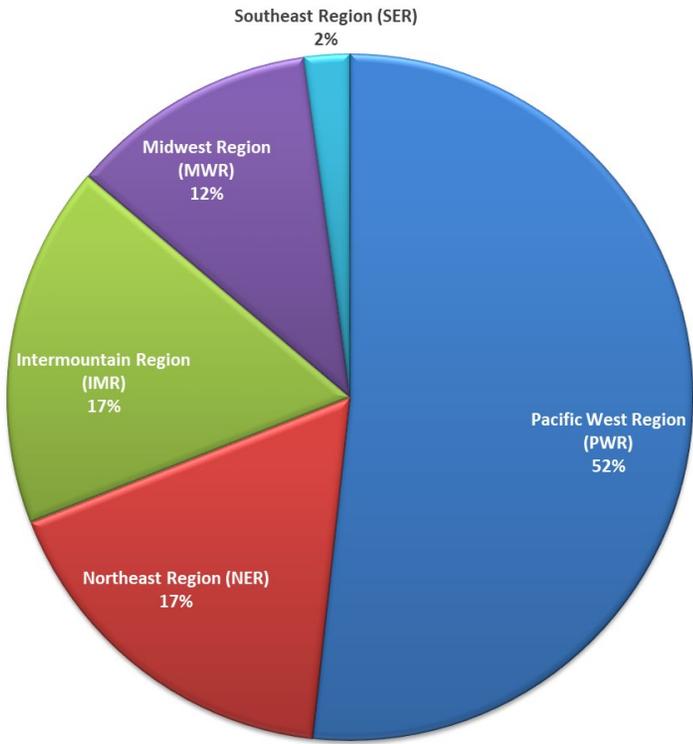


Figure 3. Reported Commercial Air Tours by NPS Region, 2018

Table 6. Reported Commercial Air Tours, 2013-2018

Year	January-March	April-June	July-September	October-December	Total Air Tours ^A
2013	14,755	22,748	24,200	18,718	80,558
2014	13,548	25,402	30,176	20,450	89,752
2015	13,664	23,441	23,077	14,913	75,300
2016	12,815	15,676	21,715	13,913	64,235
2017	11,520	15,386	19,175	12,126	58,692
2018	9,714	13,041	14,914	9,250	47,143

A. Annual totals exceed sum of quarterly totals due to exempt parks where only the annual total is required.

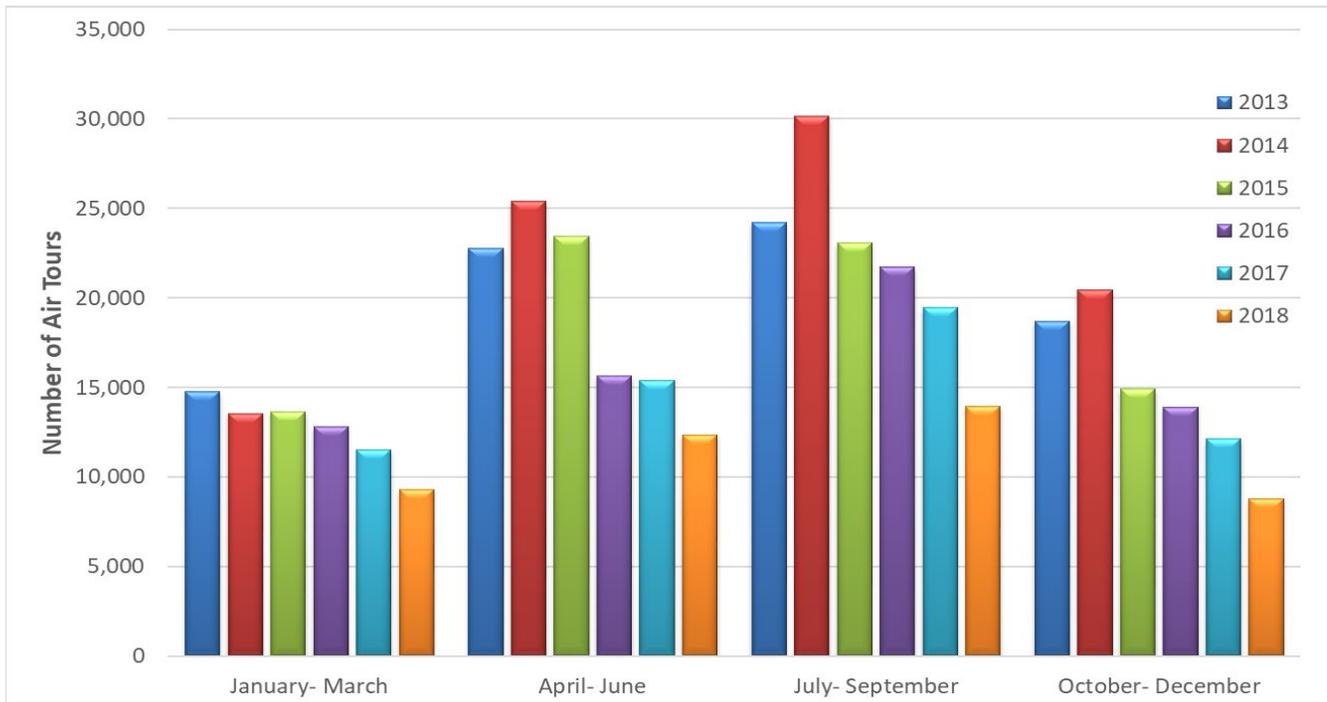


Figure 4. Reported Commercial Air Tours 2013-2018 by Quarter

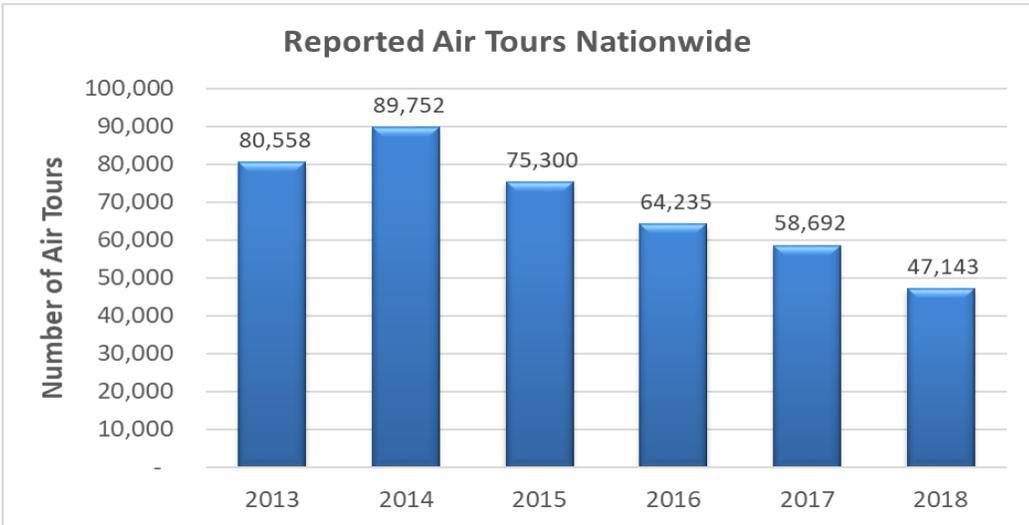


Figure 5. Reported Commercial Air Tours 2013-2018 by Year.



Figure 6. All units, and New York Contribution.

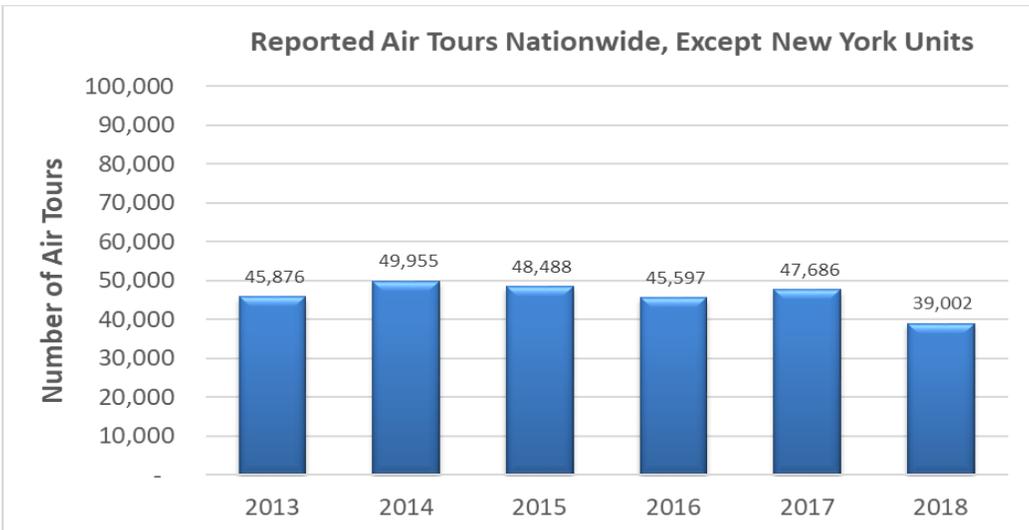


Figure 7. All units except New York contribution.

Table 7. Park Units that Require an Air Tour Management Plan or Agreement

Unit of the National Park System	Region	State	Total Air Tours
Hawai'i Volcanoes National Park (HAVO)	Pacific West	Hawaii	8,333
National Parks of New York Harbor Management Unit (NPNH)	Northeast	New York, New Jersey	8,141
Lake Mead National Recreation Area (LAKE)	Pacific West	Arizona, Nevada	7,401
Haleakalā National Park (HALE)	Pacific West	Hawaii	4,757
Glen Canyon National Recreation Area (GLCA)	Intermountain	Arizona, Utah	4,715
Mount Rushmore National Memorial (MORU)	Midwest	South Dakota	3,788
Golden Gate National Recreation Area (GOGA)	Pacific West	California	2,548
Badlands National Park (BADL)	Midwest	South Dakota	1,729
Rainbow Bridge National Monument (RABR)	Intermountain	Utah	1,526
San Francisco Maritime National Historical Park (SAFR)	Pacific West	California	1,117
Great Smoky Mountains National Park (GRSM)	Southeast	Tennessee, North Carolina	807
Bryce Canyon National Park (BRCA)	Intermountain	Utah	532
Canyonlands National Park (CANY)	Intermountain	Utah	314
Glacier National Park (GLAC)	Intermountain	Montana	298
Arches National Park (ARCH)	Intermountain	Utah	225
Point Reyes National Seashore (PORE)	Pacific West	California	151
Biscayne National Park (BISC)	Southeast	Florida	82
Bandelier National Monument (BAND)	Intermountain	New Mexico	76
Big Cypress National Preserve (BICY)	Southeast	Florida	65
Olympic National Park (OLYM)	Pacific West	Washington	64
Natural Bridges National Monument (NABR)	Intermountain	Utah	63
Everglades National Park (EVER)	Southeast	Florida	62
Canyon de Chelly National Monument (CACH) ^A	Intermountain	Arizona	30
Mount Rainier National Park (MORA) ^A	Pacific West	Washington	1
Death Valley National Park (DEVA) ^A	Pacific West	California	0
Total			46,825

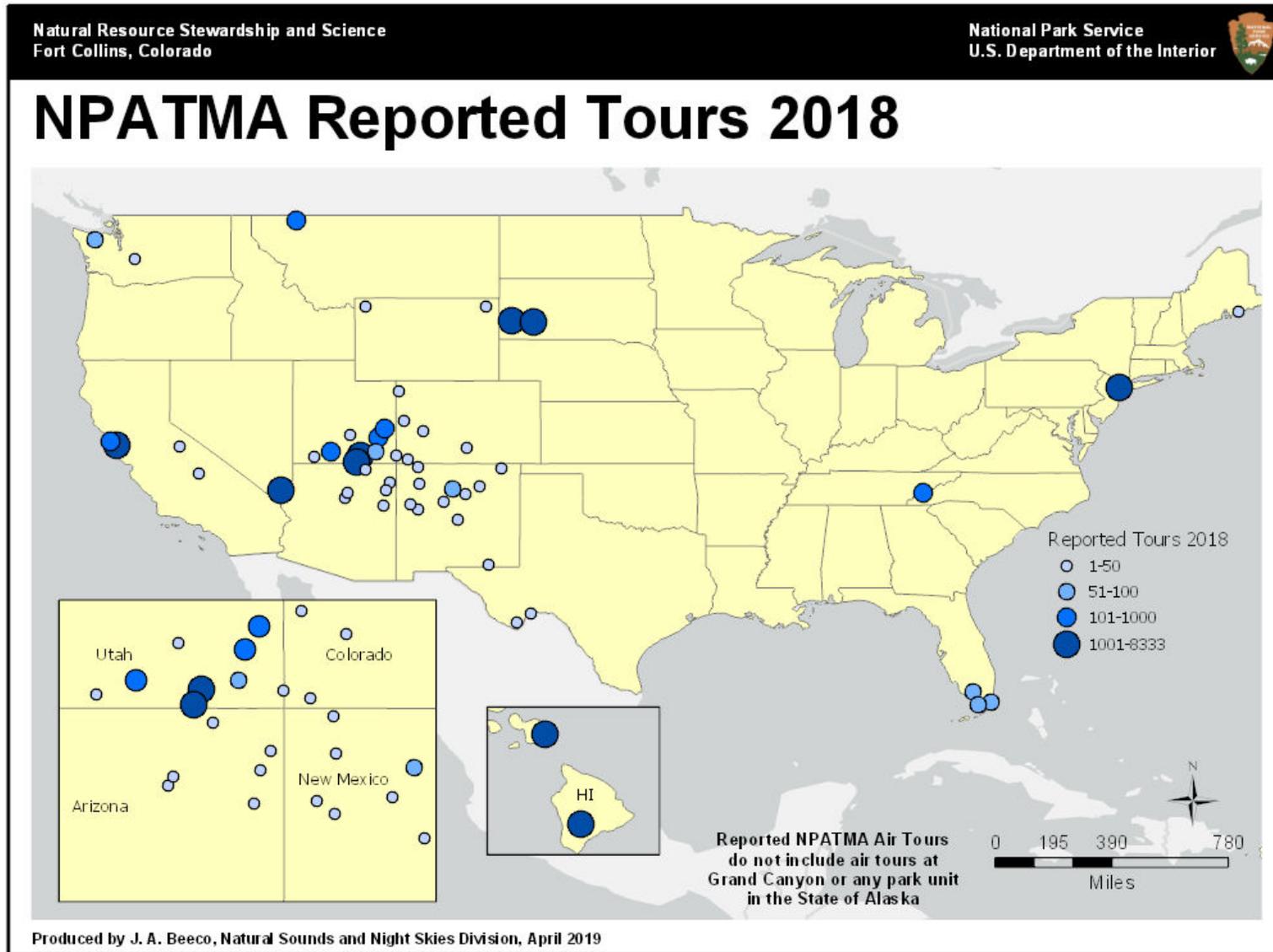
A. NPS withdrew exemption for this park unit, therefore, an air tour management plan or agreement is required.

Table 8. Park Units that Qualify for the Exemption Based on 2018 Data

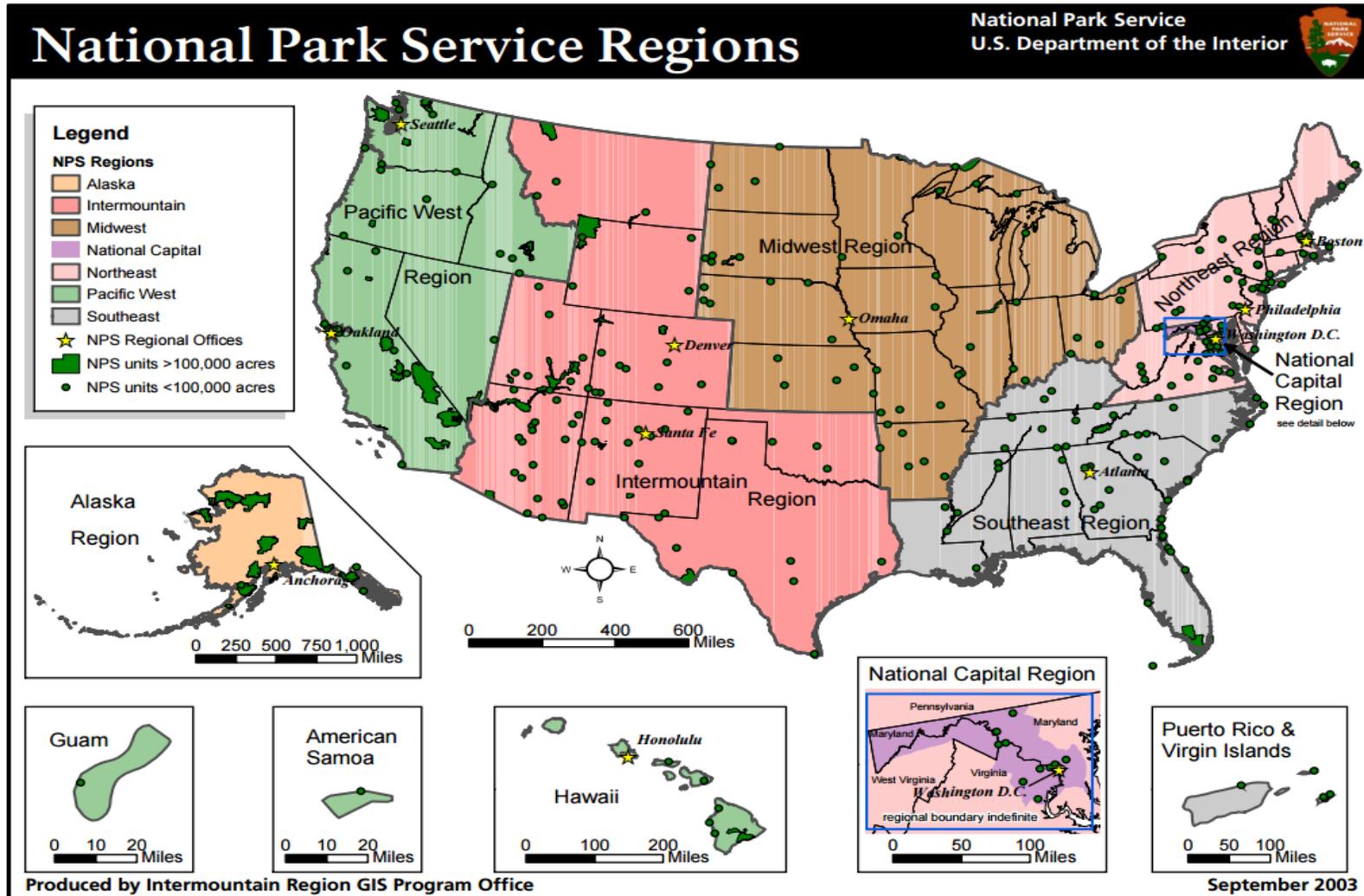
Unit of the National Park System	Region	State	Total Air Tours
Big Bend National Park (BIBE)	Intermountain	Texas	48
Chaco Culture National Historical Park (CHCU)	Intermountain	New Mexico	31
Aztec Ruins National Monument (AZRU)	Intermountain	New Mexico	27
Mesa Verde National Park (MEVE)	Intermountain	Colorado	27
Acadia National Park (ACAD)	Northeast	Maine	22
Hovenweep National Monument (HOVE)	Intermountain	Utah	20
Navajo National Monument (NAVA)	Intermountain	Arizona	19
Yosemite National Park (YOSE)	Pacific West	California	19
Petroglyph National Monument (PETR)	Intermountain	New Mexico	11
El Malpais National Monument (ELMA)	Intermountain	New Mexico	10
Devils Tower National Monument (DETO)	Intermountain	Wyoming	9
Pecos National Historical Park (PECO)	Intermountain	New Mexico	9
Zion National Park (ZION)	Intermountain	Utah	9
Fort Union National Monument (FOUN)	Intermountain	New Mexico	8
Yellowstone National Park (YELL)	Intermountain	Idaho, Montana, Wyoming	6
Black Canyon Of The Gunnison National Park (BLCA)	Intermountain	Colorado	5
Capitol Reef National Park (CARE)	Intermountain	Utah	5
Capulin Volcano National Monument (CAVO)	Intermountain	New Mexico	5
Colorado National Monument (COLM)	Intermountain	Colorado	5
Hubbell Trading Post National Historic Site (HUTR)	Intermountain	Arizona	3
Petrified Forest National Park (PEFO)	Intermountain	Arizona	3
Sunset Crater Volcano National Monument (SUCR)	Intermountain	Arizona	3
Carlsbad Caverns National Park (CAVE)	Intermountain	New Mexico	2
Dinosaur National Monument (DINO)	Intermountain	Colorado, Utah	2
Great Sand Dunes National Park and Preserve (GRSA)	Intermountain	Colorado	2
Salinas Pueblo Missions National Monument (SAPU)	Intermountain	New Mexico	2
Muir Woods National Monument (MUWO)	Pacific West	California	2
El Morro National Monument (ELMO)	Intermountain	New Mexico	1
Rio Grande Wild and Scenic River (RIGR)	Intermountain	Texas	1

Unit of the National Park System	Region	State	Total Air Tours
Sequoia and Kings Canyon National Parks (SEKI)	Pacific West	California	1
Wupatki National Monument (WUPA)	Intermountain	Arizona	1
Casa Grande Ruins National Monument (CAGR)	Intermountain	Arizona	0
Cedar Breaks National Monument (CEBR)	Intermountain	Utah	0
Coronado National Memorial (CORO)	Intermountain	Arizona	0
Dry Tortugas National Park (DRTO)	Southeast	Florida	0
Fort Bowie National Historic Site (FOBO)	Intermountain	Arizona	0
Fort Davis National Historic Site (FODA)	Intermountain	Texas	0
Gila Cliff Dwellings National Monument (GICL)	Intermountain	New Mexico	0
Golden Spike National Historic Site (GOSP)	Intermountain	Utah	0
Grand Teton National Park (GRTE)	Intermountain	Wyoming	0
Guadalupe Mountains National Park (GUMO)	Intermountain	Texas	0
Hohokam Pima National Monument (PIMA)	Intermountain	Arizona	0
Mojave National Preserve (MOJA)	Pacific West	California	0
Montezuma Castle National Monument (MOCA)	Intermountain	Arizona	0
North Cascades National Park (NOCA)	Pacific West	Washington	0
Organ Pipe Cactus National Monument (ORPI)	Intermountain	Arizona	0
Pipe Spring National Monument (PISP)	Intermountain	Arizona	0
Saguaro National Park (SAGU)	Intermountain	Arizona	0
Timpanogos Cave National Monument (TICA)	Intermountain	Utah	0
Tumacacori National Historical Park (TUMA)	Intermountain	Arizona	0
Tuzigoot National Monument (TUZI)	Intermountain	Arizona	0
Walnut Canyon National Monument (WACA)	Intermountain	Arizona	0
Yucca House National Monument (YUHO)	Intermountain	Colorado	0
Total			318

Appendix B. Map of 2018 Commercial Air Tour Activity



Appendix C. Regions of the National Park Service





Appendix E: Air Tour Management Presentation

National Parks Air Tour Management Program



**Federal Aviation
Administration**



**National Park
Service**

Air Tour Management

Presented to: NPOAG, Jackson, WY

By: FAA and NPS

Date: May 14, 2019



Mount Rushmore and Badlands

- **Currently working on Agreement with fixed wing operator who conducts tours at Mount Rushmore and Badlands**
- **Preliminary draft Agreement has been developed, air tour operator and NPS have agreed on operating parameters, FAA has reviewed for any safety concerns**
- **Operator flies Cessna 172 / Cessna 206 aircraft**
- **Will fly existing routes / altitudes for both park units**
- **Number of operations: IOA levels at Mount Rushmore, some increase at Badlands**
- **Agreements currently under review, expect draft Agreements to be posted for public review by early summer**

- **Discussion with helicopter operator's Agreements ongoing, Badlands Agreement further along than Mount Rushmore Agreement**



Glen Canyon NRA and Rainbow Bridge NM

- **Agreement covers 7 air tour operators providing tours at these two national park units**
- **One operator providing tours at these two national park units not a part of the Agreement**
- **Agreement finalized last year, operators OpSpecs updated to incorporate the Agreement**
- **The Agreement notes that operators and NPS will participate in annual fall meetings (post-primary visitor season), and at other times as necessary to:**
 - Review the summer season
 - To monitor implementation of the Agreement
 - To assess the effectiveness of the Agreement in providing appropriate air tour opportunities while protecting park resources and visitor enjoyment,
 - Promote collaboration and coordination
- **Due to scheduling issues, the inaugural annual Agreement meeting was held on April 23, 2019 with operators, NPS, and FAA participating.**



Glen Canyon NRA and Rainbow Bridge NM

- Highlights from April 23, 2019 Agreement meeting

Overall:

- operators reported a generally smooth transition to agreement conditions
- interest in a park endorsement for marketing

Operator - Proposed Amendments:

- allow a limited number of ad hoc charters over natural zone
- more flexibility for flights over natural zone
- simplify curfew times for Rainbow Bridge
- increase allocations over the lake, and/or do not use allocation in 1Q if QT used (not inc. Rainbow Bridge)

Tribal input:

- concerns over low-level flights on tribal land
- educate pilots on tribal resources/lands



Voluntary Surrender Letters

- **Latest effort to see if air tour operators reporting no tours (2013-2017) over a park unit for which they have IOA, would voluntarily surrender their IOA**
- **A review of operators who have not flown a tour(s) over a national park unit(s) in the last 5 years (2013-2017) for which they have IOA found:**
 - 20 Operators
 - Covering 47 National Park Units
 - Approximately 12,600 IOA
 - 2 Operators at 3 Park Units Account for Approximately 9,600 IOA



Voluntary Surrender Letters

Received responses from a little over half of the 20 operators

No operator agreed to voluntarily surrender their IOA

Responses included:

- **Would like to retain until at least next tour season, will re-visit then**
- **Developing plans to conduct tours in 2019, if plans do not materialize would be open to further conversation**
- **With limited amount of IOA would not put resources into marketing them, some demand from elderly / infirm who don't have same access opportunities as general public**
- **Last decade has been difficult on small businesses, had to ground planes due to overhaul rule in 2017, lost business, optimistic getting it back, would be open to trade IOA from these parks for other parks that are more in demand**



Voluntary Surrender Letters (cont.)

Responses included:

- Only have a handful at one park, have been working on adding this park to some other existing tours and include this park
- Wanted to keep that opportunity for that one park in the future
- Previous owner did not use, fallout from a previous accident and lack of financial resources, now under new ownership which has been working to upgrade the business, plan to re-initiate tours in summer 2019
- Hurt by exchange rate, international business has diminished, economy improving hoping for good season
- Market trends change, want to retain ability to fly over those parks
- Looking to actively increase operations at this park, why are agencies worrying about this park with low activity / other aviation activity at the park



Pre-planning for Future Agreements

- **In early April, FAA sent out letters to 9 air tour operators indicating parks where agreements had been completed or were underway**
- **Indicated agency plans to commence Agreements at remaining parks at some point in the future**
- **Referenced company provided information submitted as part of the reporting requirements, noting agencies do not have detailed route information as part of those reports**
- **Having this information helpful in determining the level of effort and analysis that may be needed for subsequent Agreement process, will also help agencies prioritize Agreement development**



Preplanning for Future Agreements

- **Information requested:**

- Route information – each route drawn on large scale base map with arrows showing direction flown, route name correlating to quarterly reporting submittals, identify elevation at specific points along route, and for each route the following information:

Departure Airport	Route	Aircraft make/model – just one per row	Typical airspeed	Route/aircraft usage (20%, 70% etc.) = 100% per route
KABC	Heli Route 1	H206	90 kts	70%
KABC	Heli Route 1	H130	90 kts	30%
KDEF	Air Tour 1	FW202B	120 kts	50%
KDEF	Air Tour 1	FW323C	120 kts	50%





Appendix F: Enforcement and Compliance Framework Presentation

ADDRESSING COMPLIANCE IN THE NPATMA PROCESS

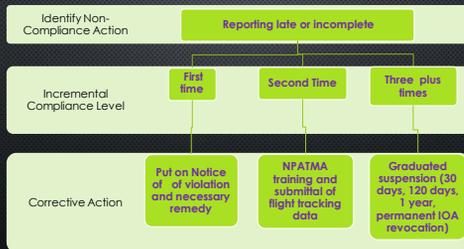
A DRAFT DISCUSSION DOCUMENT

BACKGROUND

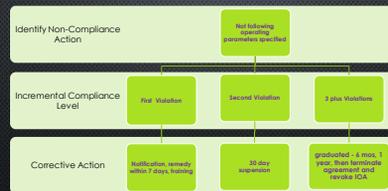
- 2017 NPOAG REQUEST
- OBJECTIVES
- APPLICABILITY

Administrative Violation Example

(e.g., Reporting is late or incomplete)



POTENTIAL FOR RESOURCE OR VISITOR USE IMPACTS (not complying with agreement provisions)



NEXT STEPS

- NPOAG INPUT



Appendix G: Fly Neighborly PDF



Fly Neighborly

Helicopter Noise Abatement Recommendations

Level Flight:

- ✈ Accelerations are quieter than decelerations
- ✈ Straight flight is quieter than turning flight

Turning Flight:

- ✈ Turning away from the advancing blade (especially when decelerating) is quieter than turning into the advancing blade
- ✈ Level turns are quieter than descending turns

Descending Flight:

- ✈ Straight-in flight is quieter than turning flight
- ✈ Steeper approaches are quieter than shallow approaches

Decelerations:

- ✈ Level flight decelerations are quieter than descending or turning flight decelerations

Maneuvering:

- ✈ Smooth and gentle control inputs are quieter than rapid control inputs

These recommendations are flight tested and scientifically vetted by the U.S. Department of Transportation Volpe Center and NASA to support the Fly Neighborly Goals.

Take the Fly Neighborly training at: <https://go.usa.gov/xQPCW>

Fly neighborly procedures/recommendations should be executed in the safest manner possible and followed only to the extent safety is not compromised.





Appendix H: Streamlining Air Tour Agreement Process Presentation

National Parks Air Tour Management Program



**Federal Aviation
Administration**



**National Park
Service**

Voluntary Agreements: Streamlining

Presented to: NPOAG, Jackson, WY

By: FAA and NPS

Date: May 14, 2019



Background

- **2012 amendment provision to the National Parks Air Tour Management Act of 2000 (NPATMA) provided agencies with the alternative of developing a voluntary agreement instead of an air tour management plan**
- **Voluntary agreement to address the management issues necessary to protect park resources and visitor use without compromising aviation safety or the air traffic control system**
- **Distinct agency responsibilities, opportunity for public review**
- **After providing an opportunity for public review of proposed voluntary agreement, the voluntary agreement may be implemented without further administrative or environmental process**
- **Amendment provided agencies with flexible approach to developing agreements at national parks**



Voluntary Agreements To Date

- **Big Cypress National Preserve, FL**
 - One existing operator and one new entrant operator
- **Biscayne National Park, FL**
 - One existing operator and one new entrant operator (same 2 operators as Big Cypress)
- **Glen Canyon National Recreation Area / Rainbow Bridge National Monument, AZ/UT**
 - Seven existing operators covered, one existing operator dropped out of the process, and another did not participate
 - Park still needs an ATMP or voluntary agreement that covers all operators



Voluntary Agreements Under Preparation

- **Badlands National Park, SD**
 - Two existing operators, one fixed wing and one helicopter operator
- **Mount Rushmore National Monument, SD**
 - Two existing operators (same 2 operators as Mount Rushmore)
- **Agreements at both parks were started in 2013 and were well along in negotiations, however, both parks were concerned about the lack of compliance with the reporting requirement by both operators.**
- **Since reports had not been submitted, the parks lacked information about the level of air tour activity at that time and decided to stop the process in 2015 until reports were submitted.**
- **NPS and FAA resumed the agreement process in 2018.**



Length of Time Needed to Complete VAs

- **Big Cypress – 3+ years**
- **Biscayne – 3+ years**
- **Glen Canyon / Rainbow Bridge – almost 5 years**
- **Badlands / Rushmore – 2+ years**
 - Extensive work previously done for ATMPs at both parks with same 2 operators
 - Fixed wing operator agreement to provide for approximately 40 annual tours
 - Fixed wing operator agreement includes same operating parameters (routes / altitudes / aircraft) as studied in ATMP



Lessons Learned

Pre-planning: need information about current status of operators, active vs. non active (and why), type of certificate, IOA, routes and other operating parameters, etc. – this is a critical step in deciding go/no go on moving forward with an agreement

Relationships between park and operators takes time to develop

Relationship between operator(s) and park managers is a factor in deciding to move forward

Relationships among operators are important

Simultaneous availability and short turnaround of reviews by operators, FAA ,and NPS staff helps to shorten the process but difficult in reality

Tribal consultation where necessary may lengthen timeline but helps ensures success when done properly

Other observations

- Park staff turnover may put the project on hold

- Other park projects or events take priority (VIP visits, other NEPA processes)

- Government shutdowns

Streamlining Suggestions

- **Preplanning:**

Work on developing relationships

Need current information about operators and air tours being flown – even if not reporting tours

Park staff conduct internal review to identify management issues, sensitive locations, if tribal consultation is needed

Conduct air tour noise modeling prior to starting negotiations

Decide if/when park staff/other agency personnel/operators are available to develop / complete agreement

- **Have a timeline**

- **Intensive / focused agreement development meetings vs. monthly telcons / ad hoc communication**

- **Consolidated / concurrent agency reviews**

- **Expedite necessary agency approvals**





Appendix I: NPOAG 15-Year Review Presentation

National Parks Overflights Advisory Group (NPOAG)

A 15-YEAR REVIEW



Purpose of assessment

- Compile historical record of NPOAG development, progression, and accomplishments
- Understand NPOAG's accomplishments, struggles, contributions, and opportunities
- From stakeholder input develop recommendations for future success

Methodology of assessment

- Review agency identified materials and background information
- Conduct interviews (via phone)
 - Develop strategy guide to identify topic areas and interview questions
 - Interview stakeholders with a cross section of interests and perspectives
 - 13 interviews were conducted
 - Interviews were informal
- Summarize informational materials and interviews in report

History of NPOAG

- NPOAG establishment – April 5, 2001
 - 22 in-person meetings since 2001
 - Meetings are open to the public
 - Membership representation from general aviation, commercial air tour operators, environmental concerns and tribes.
- NPOAG provides advice, information and recommendations to FAA Administrator and NPS director on:
 - Implementation of the Act
 - Commonly accepted quiet aircraft technology for use in commercial air tour operations over a national park or tribal lands
 - Other measures that might be taken to accommodate the interests of visitors to national parks
 - Safety, environmental, and other issues related to commercial air tour operations over a national park or tribal lands (at request of the FAA Administrator and NPS Director).
- NPOAG Strategic Plan – 2009

History & Progress of NPOAG

- Initial meetings were primarily FAA and NPS reporting to members.
- Agency representatives acknowledged that in the beginning, the agencies themselves were determining how to work together and how their agency missions could co-exist.
 - NPOAG members gradually began contributing their own perspectives in order to achieve the Act's purposes.
- Over time and with 2009 Strategic Plan, NPOAG members began exercising their advisory role and providing FAA and NPS with feedback when agency perspectives did not align.
- Today, NPOAG meetings are seen as a place to receive and distribute important, current information on a regular basis.

Theme: FAA/NPS Roles & Relationship

- Conflicting agency missions and NEPA regulations/policies contribute to slow progress of the Act's implementation and NPOAG's role.
- Differences in agency priorities
 - FAA is primarily focused on safety in the air and on the ground
 - NPS is primarily focused on impacts to parks, on the ground.
- Implementing a non-safety mandate and working directly with advisory groups is more commonplace for NPS and new for FAA.
- Agencies worked through the differences in the early years.

Theme: FAA/NPS Roles & Relationship

- Finding common ground/mutual understanding happened after:
 - The agencies agreed that park-specific language for ATMP's was needed
 - Agreements became an option through 2012 Act amendments
- "Resolving jurisdictional issues between FAA and NPS outside of NPOAG so that it can move forward," was the first goal from the 2008 assessment.
- Current FAA and NPS representatives are working well together.
- The pace of progress has increased, providing the opportunity for greater NPOAG influence and involvement.

Theme: NPOAG's Positive Influence

- Developing a forum for constructive discussion and exploration of diverse perspectives.
- Consistent public interest in participating as a member of NPOAG and positive relationships encompassing diverse points of view.
- NPOAG members "get along very well and have respect for each other."
- Voluntary Agreements.
- New technology.
- NPOAG support for collaborative efforts influenced "Fly Neighborly."

Theme: NPOAG's Influence Not Fully Realized

- Emergence of Agreements
 - NPS and FAA differences could have been resolved and ATMPs more aggressively pursued.
- Greater emphasis and pressure from NPOAG to develop an executable IOA compliance/enforcement plan that allocates real authority to FAA and NPS.

Theme: Priority Issues

- IOA (Clean-up and Enforcement)
- Agreement enforcement
- Quiet technology
 - Leveraging data for enforcement
 - Providing operators incentives for use
- Accurate, transparent, proactive and enforceable flight data collection and sharing
- Defining expectations for each park and prioritizing for ATMPs or Agreements
 - Disagreement exists about whether the focus should be on parks that have few (low-hanging fruit) or many (priority areas) air tours.
 - Some suggested that preserving solitude and quiet in the most sensitive backcountry areas of parks should have the highest priority.

Theme: Barriers to Success

- The following factors stall or inhibit implementation of the Act and NPOAG's ability to influence it:
 - Lack of reliable/complete data to support enforceable policy.
 - Unclear definitions of agencies' authority.
 - Site-specific nature of the parks makes it difficult to create rules relevant across the system.
 - Most operators follow the rules but some do not.
 - Unclear understanding of the actual noise impacts on the ground from overflights and the level the agencies are trying to reach.
 - The Act as originally written and the NEPA requirements for completing an ATMP are difficult if not impossible to achieve.
 - Conflicting agency missions.

Theme: Barriers to Success

- The following barriers, specific to NPOAG, irrelevant of the Act, were also offered:
 - Lack of communication between agencies and NPOAG between meetings.
 - Lack of NPOAG and public understanding of the group's history, purpose and the legislation that produced it.
 - Lack of understanding among the group as to each other's role and interests – why are they participating and what do they hope to achieve?

Theme: Opportunities for Success

- Recognize the accomplishments of NPOAG to validate the purpose and expertise of the members.
- Reset priorities and goals to set a clear direction for how to plan meetings and focus energy.
- Focus on the agreement template developed for Glenn Canyon National Recreation Area to more efficiently and effectively move towards implementation of the Act.
- Clearly identify areas where FAA and NPS are in conflict (or at an impasse).
- Allow NPOAG to provide advice, tapping into diverse perspectives and expertise.
- Foster solution-oriented comments and input to keep the group's focus on the shared mission of implementing the Act.

Theme: Opportunities for Success

- Development of Consensus Agreements and recommendations regarding:
 - Park prioritization for ATMPs and Agreements
 - Quiet-technology investment incentives
 - IOA clean-up process, including best use of data with a goal of removing "Interim"
 - ATMP and Agreement Enforcement procedures
 - Expedited Agreement Process

Theme: Opportunities for Success

- Specific agenda topics for future meetings
 - Hawaii Parks Agreement
 - Other parks mentioned for increased NPOAG input (Glacier, Bryce Canyon, and all southern Utah parks)
 - Assisting FAA and NPS with determining:
 - where air tours should operate
 - whether there are clear separations where visitors enjoy parks from the ground and the air
 - Airport take-off and landing exemptions
 - Operator competitive bidding process

Theme: NPOAG Membership

- More participation from Native American Tribes
- Missing voice of the casual park visitor/tourist/recreationist that can share their perspective on how air tours do or do not impact their experience in the parks
- Maintain balance of large and small operators
- Fixed-wing operators are underrepresented

Theme: Communication & Meeting Format

- Meeting presentations
 - Presenting information or seeking feedback? Need to foster dialogue and ask questions
 - Presentations lack a clear directions (What do we do with this information?)
- Meeting logistics
 - Increased meeting frequency (in-person preferred over teleconference)
 - spend less time on annual updates and more time maintaining member connections, setting/achieving goals, and reaching consensus agreements.
 - More opportunity to experience the parks (air and ground)
 - Priority should be given to locations where the group can focus on developing actionable recommendations
- Communication and meeting productivity suggestions:
 - Subcommittees
 - Increased communication between meetings
 - Expand NPS story map

Key Findings & Recommendations

- Complete a Strategic Plan Update with the following focus areas:
 - Clean-up IOA
 - Develop actionable IOA enforcement
 - Address lack of enforcement in Agreements
 - Advance and incentivizing quiet technology
 - Prioritize parks for ATMP or Agreement implementation
- Increased meeting frequency to twice annually
 - Focus on actionable recommendations
- Meetings should assume a collaborative "workshop" format, shifting some of the air-tour information sharing presentations to an electronic format, between meetings.
- Information sharing topics should be directly linked to a decision-making process for one of the above-mentioned goals.

Key Findings & Recommendations

- Develop NPOAG subcommittees
 - Representative of all the interests
 - Focused on each of the goals
- Subcommittees will be:
 - Tasked with producing draft recommendations between meetings
 - Help maintain momentum and promote continuous engagement
 - Provide for greater emphasis on full group discussion and consensus building during in-person meetings

Discussion

NPOAG: A 15-YEAR REVIEW





Appendix J: Tracking Aircraft Using ADS-B Presentation

National Park Service
U.S. Department of the Interior



Tracking Aircraft via ADS-B: Phase III

Adam Beeco and Damon Joyce

EXPERIENCE YOUR AMERICA

Automatic Dependent Surveillance-Broadcast (ADS-B)

- Real-time location identifier (lat, long, altitude) application for pilots and controllers alike that allows 'see and be seen' features
 - Aircraft with ADS-B Out push out a signal that other pilots and air traffic controllers can see.
 - Aircraft with ADS-B In can receive a signal from all other pilots in that area.
- Starting January 1, 2020:
 - When operating in the designated airspace, aircraft must be equipped with ADS-B Out avionics that meet the performance requirements of 14 CFR § 91.227
 - Aircraft not complying with the requirements may be denied access to this airspace

EXPERIENCE YOUR AMERICA

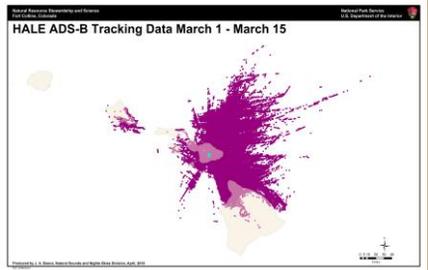
Automatic Dependent Surveillance-Broadcast (ADS-B)

- Other information we get from ADS-B units includes
 - HexID
 - Date and time
- Hex ID allows us to retrieve information from the FAA Releasable Aircraft Database, including
 - Tail Number
 - Aircraft model and type
 - Aircraft owner

EXPERIENCE YOUR AMERICA

HALE – Raw Data

- Total number of data points
 - 2018 - 531,139 (Summit Unit only)
 - 2019 – 7,657,259 (Summit and Kipahulu)



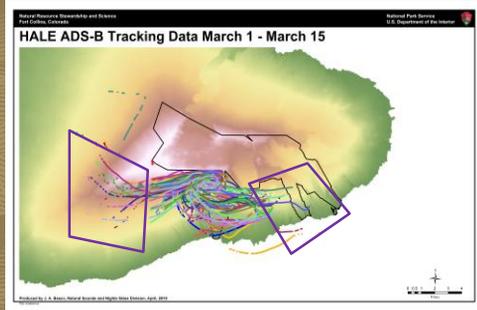
EXPERIENCE YOUR AMERICA

Steps for cleaning data

1. Text files from unit
2. Used R to clean data
 1. Deleted all data in/around airports/heliports (1,000 meter radius)
 2. Points are turned into routes by tail number, date, and timestamp – 15 minutes
 3. Routes that did not come within .5 miles of HALE and were not below 15,000 ft MSL over HALE were deleted

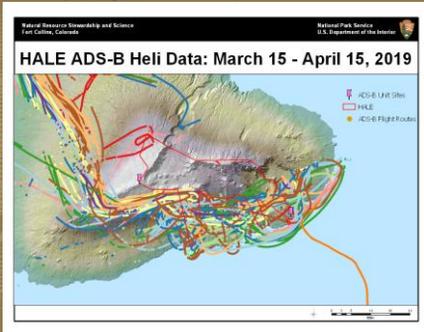
EXPERIENCE YOUR AMERICA

ADS-B 2018 Data



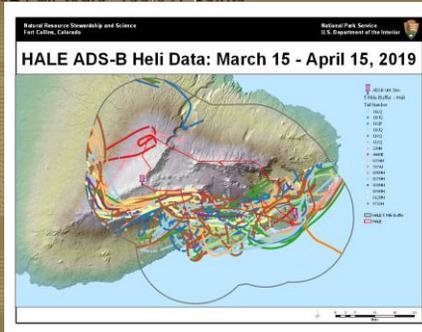
ADS-B 2019 Data

- 407 unique flights; 843,936 points



Results (within 5 miles of HALE)

- 324 air tours: 183,017 points



Further Screening

- Owner of flights (e.g. Medical Transport Corp)
- Non 'air tour behavior' – the flight heading south

EXPERIENCE YOUR AMERICA

Results (within 5 miles of HALE)

Owner	Tail Number
AirStar Leasing	11LQ
Aris Aviation Group	11NQ
Flap-Air Helicopter Service	11Qp
Hawaii Pacific Aviation	11UQ
Nevada Helicopter Leasing	11XQ
Sunshine Helicopter	11YQ
Med-Trans Corp (flights were deleted)	23HH
	6094H
	787AJ
	805MH
	807MH
	808MH
	809MH
	812MH
	873SH
	444YE (deleted)

EXPERIENCE YOUR AMERICA

AGL of Helicopter Flights

- 129,564 of 182,883 points (70%) within 5 miles of HALE were below of 2000 ft AGL (609 meters)

EXPERIENCE YOUR AMERICA

AGL of Helicopter Flights

EXPERIENCE YOUR AMERICA

Natural Sounds and Night Skies Division
www.nps.gov/nsnsd



National Park Service
U.S. Department of the Interior

EXPERIENCE YOUR AMERICA



Appendix K: FOIA Request for Air Tour Reports Presentation

National Parks Air Tour Management Program



**Federal Aviation
Administration**



**National Park
Service**

Freedom of Information Act (FOIA)

Presented to: NPOAG, Jackson, WY

By: FAA and NPS

Date: May 15, 2019



Freedom of Information Act 5 U.S.C. 552

- **What is the FOIA?** *Statutory Definition:* Agencies, upon receiving requests for records which (i) reasonably describes the records sought and (ii) are made in accordance with published rules stating the time, place, fees (if any), shall make records promptly available.
- **WHAT IS THE PURPOSE OF THE FOIA?** To shed light on the operations or activities of the federal government.



Freedom of Information Act 5 U.S.C. 552

- Basically put, the FOIA is a disclosure statute which requires federal government agencies to release agency records requested by members of the public.
- Records must be released in full, except for information subject to an exemption.
- **Who may make a FOIA request?** “Any person” regardless of citizenship.
- “Person” includes individuals, corporations, associations, state and local governments, foreign government, etc.



What Records Are Exempt?

- Records that are protected from release by at least one of nine FOIA exemptions.
- Records may be withheld **only** if you have sound basis for doing so. If you have questions regarding withholding information, you should contact your FOIA Coordinator, FAA FOIA Office, or the FOIA Attorney for guidance.
- Only the portion of a record that is covered by an exemption may be withheld. For example, you may have a document where certain paragraphs are released and others are “redacted” because a FOIA exemption applies.
- The FOIA requires an line-by-line, page-by-page determination.



FOIA Exemptions

FOIA Exemption 1: Classified Records

FOIA Exemption 2: Records related to the “internal personnel rules and practices” of an agency

FOIA Exemption 3: Records exempt by other federal statute

FOIA Exemption 4: Trade Secrets and commercial/financial information

FOIA Exemption 5: Inter-agency or intra-agency memorandums or letters which would not be available by law to a party other than an agency in litigation with the agency

FOIA Exemption 6: Information about an individual the disclosure of which would constitute a clearly unwarranted invasion of personal privacy.

FOIA Exemption 7: Certain information compiled for law enforcement purposes.

FOIA Exemption 8: Information pertaining to regulation of financial institutions.

FOIA Exemption 9: Information pertaining to wells.



FOIA Coordination

- Letter informing owner of information that a FOIA request has been made, noting the specific information requested
- Indicate requested information must be released unless it is exempt from mandatory release under FOIA. To be withheld, the records must be covered by a statutory exemption set forth in 5 U.S.C. 552, of which (b)(4) may be applicable – covers “commercial or financial information obtained from a person and privileged or confidential.”
- First, for records to be exempt from release as commercial or financial information the records must (a) have been obtained from a person and (b) be commercial or financial in nature. Second, a determination must be made as to whether the records were required to be submitted to the agency or if they were voluntarily submitted.
- FAA needs an explanation of the commercial sensitivity, if any, of the material requested. FAA considers the justification provided, if agency disagrees with that position regarding some or all of the information requested, will provide advance notice of that decision.





Appendix L: Written Public Comment from Friends for a Quiet! Glacier

To: National Parks Overflights Advisory Group, NPOAG meeting May 15th, 2019

From: Friends for a Quiet! Glacier PUBLIC COMMENT FOR THE RECORD

Friends for a Quiet! Glacier is a Coalition of 33 organizations representing millions of members and National Park visitors. We write again, with concern and repeat the clarion call that is decades old.

We request your urgent attention and action necessary to direct the completion of an ATMP in Glacier National Park. Glacier is the only National Park that has had a General Management Plan in place since before the passage of NPATMA.

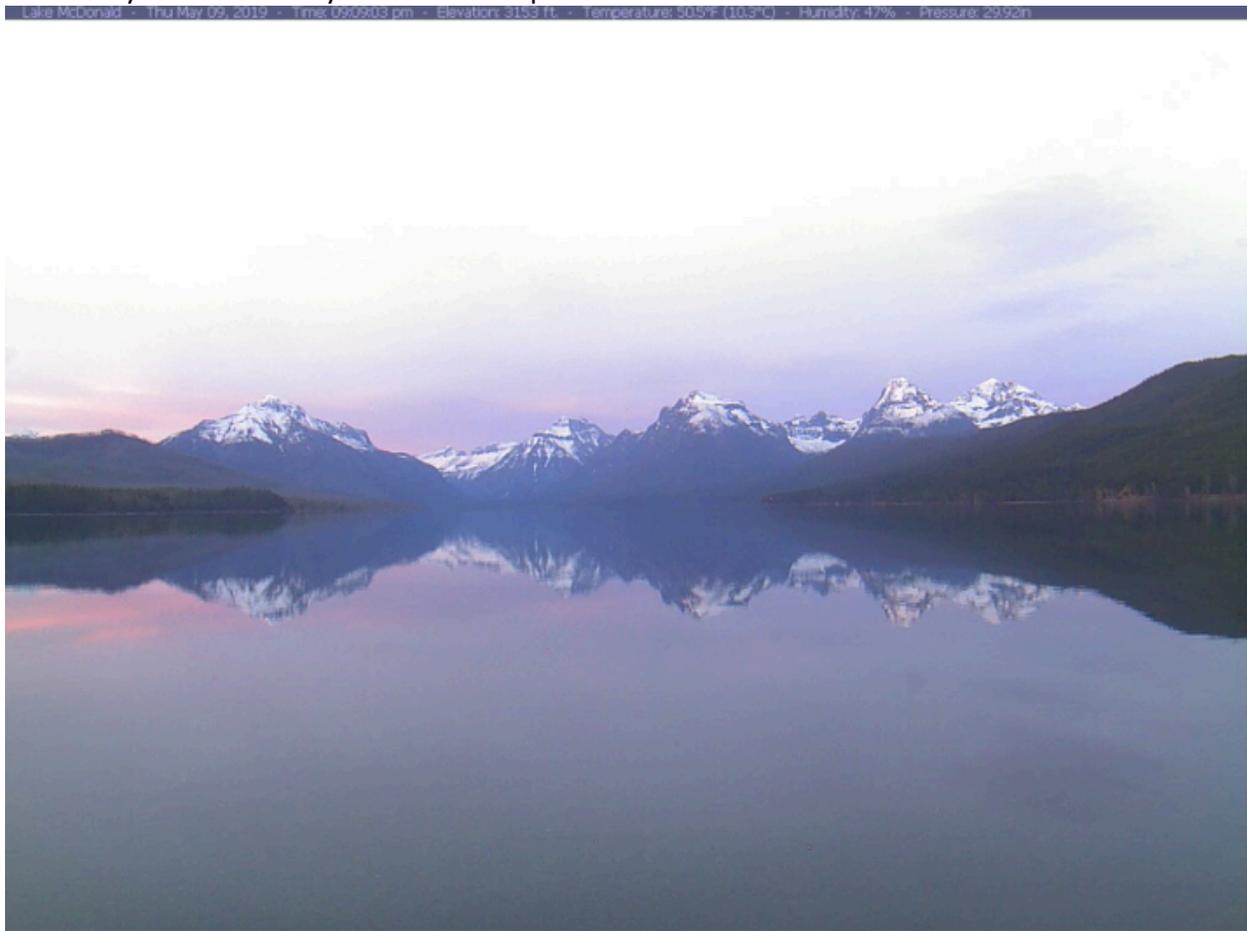
Glacier's General Management Plan

- Glacier National Park has maintained since early 2000s its readiness to proceed with development of an air tour management plan, through the NEPA process to eliminate air tours in the park in accordance with the General Management Plan that was publicly vetted and determined with EIS and ROD 20 years ago.
- Glacier National Park's General Management Plan determined tour overflights were increasingly and significantly affecting the park experience for the majority of the visitors. This was thoroughly studied and vetted through the public process and supported by a Record of Decision. From the NPS perspective and majority public opinion, scenic tours then, and today are determined to adversely impact the natural resource of the natural sound experience in the Nation's only International Peace Park, a World Heritage Site, and Bioserve.
- The ROD of the Final Environmental Impact Statement for the General Management Plan of Glacier National Park (a unit of Waterton-Glacier International Peace Park) states of Scenic Air Tours: *"The National Park Service will request that the Federal Aviation Administration prohibit all commercial sightseeing tours over the park. A scenic air tour management plan will be developed if provided for and directed by law."*
- Within one year of finalizing and publishing the GMP, that law was passed by Congress.

NPATMA requires every national park with air tours to develop an ATMP or VA.

- Glacier and NPSNS started that ATMP work with FAA in 2002.
- In 2004 Sound Monitoring Studies conducted in Glacier (this Baseline Ambient Sound Report was published 12 years later)
- In 2004 the ATMP was halted by FAA to 'consult with solicitors' and Glacier has been tabled every year since, despite repeated efforts by multiple Superintendents.
- After more than a decade of sound studies and research on air tour noise impacts on wildlife and visitor enjoyment – still no ATMP.

What do you hear when you look at this photo?



The foundation of Glacier National Park is peace and tranquility. No part of tour helicopters fits that indescribably rare experience and instead destroys the opportunity for Park visitors.

Specifically, the General Management Plan summary states, "Glacier's peacefulness and tranquility were cited in the designation of "peace" in the area in 1932. The park's solitude and tranquility were also recognized in the 1974 wilderness recommendation to Congress."

The GMP specifically it states:

Glacier's enabling legislation requires the NPS to regulate activities in such a way as to "preserve a state of nature" while balancing visitor use. The visitor experience is diminished by scenic air tours continuing to operate in backcountry areas where peace and solitude have high value for visitors. Glacier's peacefulness and tranquility were cited in the designation of an "International Peace Park" in the area in 1932. The park's solitude and tranquility were also recognized in its 1974 wilderness recommendation to Congress. The NPS believes that visitors to Glacier National Park's backcountry should have the opportunity to experience Glacier's peacefulness and solitude without disruption by scenic air tours. This action applies only to scenic air tours and not to restrict private aircraft or commercial aircraft flying over the park...Inasmuch as the Going-to-the-Sun road was developed six decades ago to allow access to the park's interior, and designed in such a way as to provide for scenic viewing in the park's back country for all visitors, it was felt the intrusiveness of scenic air tours was not an appropriate use for Glacier.

Completing and ATMP is long overdue and the reasons for doing so are even more relevant and compelling today than when Glacier began the process in early 2000s.

To that end, we have carried this message to the public, to this Advisory Board and the agency heads, that there are three things at work in Glacier National Park:

- 1) The disproportionately small number of people causing noise pollution adversely to impact the experience for the large number (majority) of visitors. Accessibility - everyone who visits the Park has access to the view and the experience on Going-to-the-Sun Road by car, shuttle, or bus. And because of the commercial air tours, everybody who visits Glacier National Park has to endure the noise of the helicopters servicing a very few. One cannot escape the tour helicopter noise that litters Glacier. The Park permits use of flights for administrative purposes only when no other options exist. Emergency, including fire flights, are not subject to the same restrictions. Every flight is reviewed and is subject to environmental compliance.
- 2) Glacier is 95% defacto Wilderness. Director's order #41 states that defacto Wilderness be managed as Wilderness. The Director's Order, dated May 13, 2013, defines the number one NPS role and responsibility as "Visitor and Resource Protection".
- 3) This is a noise is an acoustical and visual pollution issue, not an aviation issue.

Tour Operator Overflights an Inconsistent Use of the Park

- The operators in Glacier have conducted business for an entire generation based on being granted a temporary permit that was based on unverified or inflated tour number claims. The Glacier National Park visitors should not have to endure another generation of noise pollution in one of the only places they can travel to get away from noise.
- The acoustical litter is caused by private operators outside the park, privately benefitting from tours at the cost of adversely affecting visitors in the park.
- Tour companies can still charter flights over the park from an airport, but the American people are not obligated to provide that platform for private ventures that destroy the experience for the majority. No other concession in the National Park Service is allowed to do this.
- NPOAG has been over the situation in Glacier for nineteen years. The issues we are repeating in this public comment are not new, but we mention them because they remain unresolved and even, unaddressed in any meaningful way.

The Air Tour Noise Modeling Report for Glacier National Park

- The Air Tour Noise Modeling Report, requested by Glacier National Park, is the first meaningful effort made in a long time and a valuable tool with the stated purpose of ***“the advancement of science, informed decision-making, and the achievement of the National Park Service mission.”***
- What we need to remember was stated well by David Owen in a recent article (May 2019 New Yorker, Volumetrics) - **“measuring noise is important but it isn’t an end in itself.”**
- This Report is good news because, as noted by the Paris organization that monitors environmental noise, Bruitparif’s Director Fanny Mietlicki stated, “You need to have data in order to know where to implement noise abatement actions.”
- The Air Tour Noise Modeling Report demonstrates the management action Glacier has been trying to undertake for twenty years, is the absolute best protection of the quiet natural resource for the survival of ecosystems, the survival of a quiet place, for future generations.

The report has a wide variety of potential scenarios translating model inputs into noise measurement estimates. **However, the summary minimizes the adverse effects of air tour noise pollution even though the model reveals air tour noise impacting 87% of the park.** It makes no mention of the many unique factors of the park that exacerbate tour helicopter noise impacts. It does not adequately address the existence of Glacier’s General Management Plan that determined a complete phase out as the appropriate management option two decades ago. Instead of justifying why air tour noise is acceptable in a Wilderness National Park, these report findings actually support Glacier in completing an ATMP and concluding the IOA permanently. Glacier NP has already determined this activity is detrimental to the Park natural resources. Where is mention of this prioritized value of quiet?

- The metrics demonstrate that it doesn’t matter how many flights there are because even at the lowest numbers, with the geology of the park, the visitors present are affected. Does this not send out an alarm that ‘scaling up’ to the allotted number based on never used IOA is an absurd irresponsibility on the part of the agencies?
- The Modeling Report mentions ‘incentives’ to use quieter aircraft – just what incentives? There is no such thing as a quiet helicopter, in fact it is designed in a way that creates three kinds of noise that cannot be silenced. Maybe in another few decades? So, meanwhile the noise is allowed? Any eventual technological development in the future could certainly be incorporated or the ATMP revisited with new technology when it became available. But to say we can leave it as it is until then, what incentive is there?

- The report states that only 30% of visitors report being bothered by the noise. How many are bothered and don't report it? The rule of thumb in public relations is that more than 90% of people will not leave a complaint when unsatisfied. Not filing complaints doesn't make the negative effect of visitors' experience go away.
- The report clearly documents what we have been witness to – 2017 and 2018 -two years in a row of a drastic drop in flights after four years of a steep increase--- and those reductions from two operators granted the highest number of IOA – which have never all been used. Modeling for “scale-up”?! This is instead an opportunity to close out tour helicopter use of the park and FAA and NPS have the authority and the responsibility to do so.

For example:

It is our observation and responsibility to keep repeating FAA gave Glacier tour operators temporary authority to conduct tours based on the number of tours they were flying in the early 2000's until the ATMP was completed. The unreliability of these submissions has been on the agenda in NPOAG since at least 2004. These numbers were self-reported, never verified and even the original submissions were in question by Glacier (see chart below). It appears FAA made no forthright attempt to correct this other than give operators a chance to correct numbers (on their honor), which of course no Glacier operators did. FAA made no concerted effort to verify the inflated and padded numbers operators claimed to be conducting and left them as submitted, even with notes from the Park indicating they may be inaccurate and were not based on fact.

In the chart below, every single one of the comments emphasizes the Park has no way of confirming the claims and introduces the warning that “*the number of operations should be made based upon factual information*”, because it was obvious, they were not. (from Glacier National Park – Comments on FAA List of Interim Operating Authorized Air Tour Companies, 10/10/2008).

Why is this still unexamined?

Glacier National Park	Homestead Helicopters	15	The park is aware of this operator but cannot confirm that they operate in the Park or the number of flights that they may conduct. We believe they operate out of Missoula MT. The number of operations should be made based upon factual information.
Glacier National Park	Kruger Helicopters	750	One of the primary rotor wing operators over the park, based out of West Glacier (home base is in Lakeside MT.). This operator conducts many flights over the park during the summer. The number of flights appears unusually high and is suspect given the short season (June-September) and the fact that there is generally one helicopter and one pilot conducting the flights. The number of operations should be made based upon factual information.
Glacier National Park	Minuteman Aviation	717	One of the primary rotor wing operators over the park, based out of West Glacier (home base is in Missoula MT.). This operator conducts many flights over the park during the summer and often has 2-3 helicopters at the site. It is possible that this number of flights occurred but season (June-September) is fairly short. Operator/owner lives in West Glacier year round but the primary tour season is June-September. The number of operations should be made based upon factual information.
Glacier National Park	Montana By Air	12	The Park is not aware of this operator or where their primary base of operations is located. The Park cannot confirm that they have conducted any operations over the park. The number of operations should be made based upon factual information.
Glacier National Park	Red Eagle Aviation	159	A regular fixed wing operator based out of Kalispell City Airport that is known to conduct tours over the park. The park cannot confirm the actual number of operations over the park. The number of operations should be made based upon factual information.

- Finally, we are perplexed by the report summary that minimizes the adverse effects of air tour noise pollution even though the model reveals air tour noise impacting the vast majority of the park and only offers the ATMP solution of no air tours -as a last choice.

Air tours over Glacier National Park (and others) are not “necessary and appropriate” commercial activities (National Parks Omnibus Management Act of 1998 (PL. 105-391) because they “*significantly impair park resources or values*” and they also “*unduly conflict with other park uses and activities*”.

Glacier’s General Management Plan clearly reflects this understanding and the Park has not wavered from this determination. Helicopter overflights are an inappropriate use, unless they are for rescue, research or necessary park administration.

The NPS is obligated under 2006 Management Policies, to allow only appropriate activities:

- 1) results in no impairment of natural or scenic values;
- 2) does not itself become a primary attraction, and
- 3) does not lessen the opportunity for others to enjoy the park.

In NPATMA, Congress has given

- NPS authority and responsibility of conservation and protection “***of the scenery and natural and historic objects and wildlife in national parks and providing for the enjoyment of the national parks in ways that leave the national parks unimpaired for future generations***”;
- And the FAA the authority to “***preserve, protect, and enhance the environment by minimizing, mitigating, or preventing the adverse effects of aircraft overflights on public and tribal lands.***”

Our question to FAA is what part of tour helicopters preserves, protects and enhances the environment in Glacier?

We understand that NPOAG has been given the task of compromising disparate agencies with no common goal. But given the special circumstances in Glacier National Park –an international peace park with an administrative commitment for Quiet, that has been supported within the NPS and the public with a General Management Plan in place for 20 years –we implore NPOAG, FAA and NPS NSNS to finalize the protection of quiet in honor of the ‘peace and quiet’ people seek when visiting a National Park like Glacier—as Congress intended, for today and for future generations.

We look forward to a reply and action on the ATMP in Glacier National Park.

Sincerely,

Mary T. McClelland, Coordinator

(815) 482-7404

ORGANIZATIONS OF THE Quiet! Glacier Coalition

ACOUSTICAL SOCIETY OF AMERICA
ALLIANCE FOR THE WILD ROCKIES
AMERICAN PACKRAFTING ASSOCIATION
CENTER FOR BIOLOGICAL DIVERSITY
CONSERVATION CONGRESS
EARTHWISE PRODUCTIONS
FLATHEAD AUDUBON SOCIETY
FRIENDS OF THE WILD SWAN
GLACIER PARK FOUNDATION
GLACIER TWO MEDICINE ALLIANCE
GREAT OLD BROADS FOR WILDERNESS
GRINNELL FAMILY ASSOCIATION OF AMERICA
HEADWATERS MONTANA
LATINO OUTDOORS
LEAGUE OF WOMEN VOTERS OF ESTES PARK
LEAGUE OF WOMEN VOTERS OF MONTANA
MONTANA ECOSYSTEMS DEFENSE COUNCIL
MONTANA WILDERNESS ASSOCIATION
NATURE SOUNDS SOCIETY
NATIONAL PARK CONSERVATION ASSOCIATION
NORTH FORK PRESERVATION ASSOCIATION
ONE SQUARE INCH OF SILENCE FOUNDATION
QUIET PARKS INTERNATIONAL
RESTORE THE NORTH WOODS
SIERRA CLUB
S.P.E.C.I.E.S.
SWAN VIEW COALITION
WILD MOUNTAIN ECHOES
WILD SANCTUARY
WILDEARTH GUARDIANS
WILDERNESS WATCH
WILDWEST INSTITUTE
YELLOWSTONE SAFARI COMPANY



Appendix M: Public Comment Sign-In Sheet



Appendix N: Agenda

National Parks Overflights Advisory Group Meeting and Field Trip
Meeting – Tuesday and Wednesday, May 14-15, 2019
Field Trip – Wednesday Afternoon, May 15, 2019

Craig Thomas Discovery and Visitor Center
 1 Teton Park Road
 Moose, WY, 83012
 Room: Director’s conference

Agenda

Day 1, Tuesday, May 14

Time	Topic	Materials
8:15-8:30 am (15”)	Meet and Greet	
8:30-9:00 am (30”)	Introduction <ul style="list-style-type: none"> • Welcome— Gopaul Noojibail, Acting Superintendent, Grand Teton National Park • Ray Sauvajot, ADNRSS, NPS • Kevin Welsh, FAA Office of Environment/Energy and Raquel Girvin, FAA Regional Administrator • Introductions, logistics and ground rules - Bryant Kuechle (Facilitator with Langdon Group) 	
9:00-9:30 am (30”)	Agency Updates - Keith Lusk (FAA) and Vicki Ward (NPS) <ul style="list-style-type: none"> • Chair and Co-Chair Updates • Action Items/Recommendations from 2018 NPOAG Meeting 	Action Items/Recommendations from 2018 NPOAG Meeting
9:30-10:00 am (30”)	Air Tour Reporting Data- Brent Lignell (NPS) <ul style="list-style-type: none"> • Review of 2018 Air Tour Data <ul style="list-style-type: none"> ○ Annual and five-year trend data • New 2019 Reporting Template • Reporting compliance, timeliness, and quality discussion 	2018 Air Tour Data
10:00-10:15 am (15”)	Break	
10:15-11:00 am (45”)	Air Tour Management - Vicki Ward, Keith Lusk, and Brent Lignell <ul style="list-style-type: none"> • Agreement progress at <ul style="list-style-type: none"> ○ Mount Rushmore and Badlands ○ Glen Canyon and Rainbow Bridge Meeting • Update on voluntary surrender letters for operators reporting zero tours • Preplanning for future Agreements • Operator information outreach <ul style="list-style-type: none"> ○ NPOAG advice on appropriate agency action when operators do not respond to agency requests for information necessary to implement NPATMA 	
11:00-12:00 am 1’	Enforcement and Compliance Framework Discussion – Vicki Ward and Karen Trevino <ul style="list-style-type: none"> • Background 	

	<ul style="list-style-type: none"> • Process • NPOAG advice/recommendations 	
12:00-1:15 pm (1'15'')	Lunch: Options: 1. Bring a lunch (couple of sandwich shops near hotel) 2. Ride to Dornan's (across from meeting room 0.8 mile)	
1:15-1:30 am (15'')	Update on Round Table at Hawai'i Island - Keith Lusk and Eric Lincoln	
1:30-2:00 pm (30'')	Post-Agreement treatment of non-participating operators <ul style="list-style-type: none"> • Glen Canyon & Rainbow Bridge • Other parks in the future • NPOAG advice/recommendations 	
2:00-2:15 pm (15'')	Fly Neighborly – Vicki Ward <ul style="list-style-type: none"> • Program Description • NPOAG advice/recommendations on parks and operators to partner with in Fly Neighborly 	Volpe Handout
2:15-2:30 pm (15'')	Revisiting ATMPs – Karen Trevino and Eric Elmore	
2:45-3:00 pm (15'')	Break	
3:00-3:30 pm (30'')	Streamlining Air Tour Agreement Process – Keith Lusk <ul style="list-style-type: none"> • Group discussion on ways to shorten process • NPOAG Advice/Recommendations 	
3:30-3:45 pm (15'')	Public Comment Members of the public may use two to five minutes each (depending on the number of commenters) to address NPOAG and the agencies. Written comments are also accepted.	
3:45-4:00 pm (15'')	Closing Remarks for the Day – Bryant Kuechle	
6:30 pm	NPOAG Members Group Dinner	

Day 2, Wednesday, May 15

Time	Topic	Materials
8:30-9:30 am (1')	NPOAG 15 Year Review – Bryant Kuechle <ul style="list-style-type: none"> • NPOAG feedback on draft final report • NPOAG discussion on making NPOAG more effective in the future • How to communicate with NPOAG between meetings and directly prior to meetings 	PP Presentation
9:30-10:00 am (30")	Tracking Aircraft Using ADS-B – Adam Beeco Phase III - HALE	PP Presentation
10:00-10:15 am	FOIA Requests for Air Tour Reports – Keith Lusk	PP Presentation
10:15-10:30 am (15")	Public Comment Members of the public may use up to five minutes each (depending on the number of commenters) to address NPOAG and the agencies. Written comments are also accepted	
10:30-10:45 am (15")	Break	
10:15-11:15 am (1')	NPOAG Input <ul style="list-style-type: none"> • Member remarks, considering NPOAG’s role in providing advice and counsel to the FAA and NPS with respect to FAA regulations governing commercial air tour operations over and near national parks. • Additional input and follow up on last year’s action items 	
11:15-11:30	Closing the Loop – Bryant Kuechle <ul style="list-style-type: none"> • Summary and action items • Next meeting date and place 	
11:30-12:30	Lunch: Options: <ol style="list-style-type: none"> 1. Bring a lunch (couple of sandwich shops near hotel) 2. Ride to Dornan’s (across from meeting room 0.8 mile) 	
12:30-4:30 pm (4')	Field trip to Mormon Row and Rockefeller Preserve in Grand Teton National Park Meet at Craig Thomas Discovery and Visitor Center at 12:30pm - see details below	
4:30 pm	Return from Field Trip	

NPOAG MEMBERS	
Name	Affiliation
Carl Slater	Navajo Nation Council, Speaker's Office
Les Blomberg	Noise Pollution Clearinghouse
John Eastman	Jackson Hole Airport Board
Eric Lincoln	Blue Hawaiian
Dick Hingson	Sierra Club
Melissa Rudinger	Aircraft Owners and Pilots Association
Rob Smith	National Parks Conservation Association
Alan Stephen	Grand Canyon Airlines
Matthew Zuccaro	Helicopter Association International
Vacant	Tribal Representative

Field Trip Details

The field trip will depart from the Craig Thomas Discovery and Visitor Center at 12:30 on Wednesday 15th. Two interpretive rangers from Grand Teton National Park will lead the tour. Due to the current trail conditions (i.e., snow covered), the field trip will be mostly through vehicle with some stops and very short walks. The two primary stops will be Mormon Row and Rockefeller Preserve. Mormon Row is a historical site with ample wildlife viewing opportunities. Aircraft departing and landing at Jackson Hole Airport will also be easily visible from this site. Rockefeller Preserve is in the Moose-Wilson road corridor, which is also known for its abundance of wildlife and educational center. The Rockefeller Preserve is located near the airport, perpendicular to the runway – making noise from the airport less an impact. We will return from the field trip and be back at the hotel around 4:30pm.

For the tour, please consider bringing:

- Sturdy shoes
- Water bottle
- Sun screen
- Hat
- Sun glasses
- Extra warm layers (e.g., jacket)