

Final EA – Additional Appendix Materials

Appendix K – Draft ATMP and Draft EA Public Involvement Materials

*Comment Summary Report and Agency Responses to Comments on the Draft ATMP
and Draft EA*

Copies of all public comments received on the draft ATMP and draft EA

**US Department of Transportation
Federal Aviation Administration**



**US Department of the Interior
National Park Service**



Comment Summary Report

Mount Rushmore National Memorial Air Tour Management Plan

***Summary of Comments Received During Public Comment Period and Agency
Responses to Comments
for the Draft Air Tour Management Plan and Draft Environmental Assessment***

October 2023

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INTRODUCTION

The Federal Aviation Administration (FAA) and the National Park Service (NPS) have prepared an Air Tour Management Plan (ATMP), which regulates commercial air tours conducted over Mount Rushmore National Memorial (the Park) pursuant to the National Parks Air Tour Management Act of 2000 (the Act)¹. The Act requires that the FAA, in cooperation with the NPS (collectively, the agencies), establish an ATMP or voluntary agreement for each National Park System unit for which one or more applications to conduct commercial air tours has been submitted, unless that unit is exempt from this requirement because 50 or fewer commercial air tour operations are conducted over the park on an annual basis, 49 United States Code (U.S.C) § 40128(a)(5). The objective of the ATMP is to identify acceptable terms and conditions for commercial air tours conducted over the Park and effective measures to mitigate or prevent the significant adverse impacts, if any, of commercial air tours on natural and cultural resources, Wilderness character, visitor experience, and tribal lands within the jurisdictional boundaries of the Act.

The FAA, in coordination with NPS, has prepared an environmental assessment (EA) in compliance with the National Environmental Policy Act (NEPA) to analyze a range of alternatives and evaluate potential issues and impacts as part of the ATMP planning process. The ATMP has also been developed in accordance with Section 106 of the National Historic Preservation Act and other applicable laws, regulations, and policies. A draft ATMP and draft EA were released on May 16, 2023, for public review and comment.

The agencies notified the public of the availability of the draft ATMP and draft EA using various methods including a notice in the Federal Register issued on May 18, 2023, a news release posted on the Park's website and social media accounts, and emails to the agencies' distribution list (see Appendix D of the EA, *Distribution List*). Comments were accepted on both the draft ATMP and draft EA from May 16 through June 20, 2023. The agencies posted frequently asked questions (FAQs), the draft ATMP, and draft EA to the NPS Planning, Environment, and Public Comment (PEPC) website at the start of the public comment period. In addition, Park staff responded to media inquiries and requests for interviews. This report summarizes comments received during the public comment period.

Any comments submitted to PEPC, as well as any written comments mailed to the NPS, were considered and included in the project file. The agencies analyzed the public comments and considered all comments in revising the draft ATMP and the draft EA and in preparing a final ATMP, final EA, and the Findings of No Significant Impact/Record of Decision (FONSI/ROD). This *Comment Summary Report* provides a summary of the substantive comments submitted during the public comment period.

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

COMMENT ANALYSIS METHODOLOGY

Comment analysis is a process used to compile and correlate similar comments into a usable format for the agencies' decision-makers and the program team. Comment analysis assists the agencies in organizing, clarifying, and addressing information and aids in identifying the topics and issues to be evaluated and considered throughout the ATMP planning process.

The process includes five main components:

- Developing a coding structure;
- Employing a comment database for comment management;
- Reviewing and coding of comments;
- Interpreting and analyzing the comments to identify issues and themes; and
- Preparing a comment summary.

The agencies developed a coding structure to organize comments into logical groups by topic and issue. The coding structure was designed to capture the content of the comments rather than to restrict or exclude any ideas. The agencies used the NPS PEPC database to manage the public comments received. The database stores the full text of all correspondence and allows comments within each correspondence to be coded. All substantive comments within each correspondence were grouped by topic. Substantive comments are those that do one or more of the following:

- Question, with reasonable basis, the accuracy of the information in the NEPA document;
- Question, with reasonable basis, the adequacy of the environmental analysis;
- Present reasonable alternatives other than those presented in the NEPA document; or
- Cause changes or revisions in the proposal.

Substantive comments raise, debate, or question a point of fact or analysis. The intent of the agencies is to capture the concern raised by the commenter and evaluate each substantive comment based on the individual concern, topic, or suggestion, regardless of the repetitive nature of the concern. Those comments that simply provided support or opposition are not considered substantive. All comments were grouped by similar themes under each code, and those groups were summarized with concern statements. Concern statements are written summaries of the comments received on a particular topic.

In total, the agencies received 266 correspondences, of which 118 were form letters.

SUMMARY OF COMMENTS AND RESPONSE TO COMMENTS

The following section summarizes the comments received during the public comment period and is organized by topic. The summarized text is formatted into concern statements to identify the thematic issues or concerns represented by comments within the code. The agencies only summarized comments with substantive content. The agencies collectively reviewed and analyzed each comment to determine if there were any changes warranted to

the draft ATMP or the draft EA, based on the information, question, or concern provided. The agencies have provided a response following each concern statement.

Adverse Impacts: Soundscape Impacts

1. **Concern Statement:** Commenters suggest that the EA should use averaged noise measurements rather than worst case noise estimates.

Agencies' Response: The noise analysis uses a variety of metrics to assess noise impacts, including equivalent continuous sound level (LAeq) and day-night average sound level (DNL), which are both averaged over 12 hours and 24 hours, respectively. Other metrics include time audible, time above 35 A-weighted decibels (dBA), and time above 52 dBA. Only the maximum sound level (Lmax) metric is an instantaneous metric. Additional information about noise modeling can be found in Appendix F of the EA, *Noise Technical Analysis*.

2. **Concern Statement:** Commenters suggest that it is inappropriate to single out only aircraft for noise impacts in the Park when other sources of noise, such as motorcycles, are not regulated. Additionally, commenters note a study completed by the town of Keystone that concluded that motorcycles were the biggest source of noise in the town.

Agencies' Response: Under the Act and its implementing regulations, an ATMP may only regulate commercial air tours. Other types of overflights, such as military overflights or general aviation overflights, are not regulated under an ATMP. Similarly, on the ground activities such as the use of certain types of vehicles within the Park (i.e., motorcycles) are outside the scope of an ATMP. Thus, the ATMP process was appropriately focused on the impacts of commercial air tours on Park resources and visitor experience. The agencies did consider the cumulative impact of noise, including ground transportation (where allowed within the Park) in Section 3.1.2 of the EA, *Environmental Consequences for Noise and Noise-Compatible Land Use*.

3. **Concern Statement:** Commenters suggest that the noise data presented in the EA is biased because it was not reviewed by a third party. Commenters also suggest that parameters such as temperature, wind velocity, and density altitudes were not considered.

Agencies' Response: The John A. Volpe National Transportation Systems Center (Volpe Center) conducted and reported the noise analysis for this ATMP and EA. The Volpe Center operates under the U.S. Department of Transportation and is considered an independent third party as it is not a part of the NPS or the FAA.

Further, the FAA's Aviation Environmental Design Tool (AEDT), Version 3e (Lee et al., 2022) is the FAA-approved computer program for modeling noise, as listed under Appendix A of FAA's Part 150 Airport Noise Compatibility Planning (14 Code of Federal Regulations (CFR) § A150.103(a)). Requirements for aircraft noise modeling are defined in FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*, and in Federal

Aviation Regulations (FAR) 14 CFR Part 150, Airport Noise Compatibility Planning. Noise modeling conducted for the draft ATMP and draft EA was consistent with these requirements. Additional information about noise modeling can be found in Appendix F of the EA, *Noise Technical Analysis*.

AEDT default weather data include average annual weather (i.e., based on 30-year normal and 10-year averages) for each airport, as well as International Standard Atmosphere (ISA) conditions. The ISA is an atmospheric model of how the pressure, temperature, density and viscosity of the Earth's atmosphere change over a wide range of altitude (see https://aedt.faa.gov/Documents/guidance_aedt_nepa.pdf).

AEDT is a critical element in FAA's federally required environmental review process, implemented in response to increasing air traffic and the modernization of the nation's aviation infrastructure. AEDT dynamically models aircraft performance in space and time. With over 1,000 licenses in 46 countries to date, AEDT has become the de facto global reference model for considering the interdependencies between aircraft-related fuel burn, noise, and emissions, and their collective environmental effects.

Data scientists and software developers at the Volpe Center have led the development and systems integration of AEDT. The Volpe Center team collaborates with FAA's Office of Environment and Energy, aviation manufacturers, and stakeholders from the Environmental Protection Agency (EPA), the International Civil Aviation Organization (ICAO) Committee on Aviation Environmental Protection (CAEP), the European Organization for the Safety of Air Navigation (EUROCONTROL), and the FAA ASCENT Center of Excellence—a cooperative aviation research organization co-led by Washington State University, Massachusetts Institute of Technology, Georgia Tech, and many other universities and organizations to ensure the best-available data and methods are applied by the model. In addition to model development, Volpe Center engineers support a number of analysis efforts with AEDT.

4. **Concern Statement:** Commenters suggest several areas related to noise analysis were not included in the EA, including current noise sources; potential benefits of quiet technology under Alternatives 1 (the No Action Alternative), 3, and 4; and the effects of air tours moving outside of the ATMP planning area.

Agencies' Response: Section 3.1.1 of the EA, Affected Environment for Noise and Noise-Compatible Land Use, describes the existing sounds within the ATMP planning area.

The benefits (i.e., reduction in noise) of quiet technology were considered. The implementation of quiet technology would be anticipated to improve the acoustic condition under Alternatives 3 and 4; however, because the use of quiet technology by operators would be voluntary and it is not possible to predict how many flights would use quiet technology versus standard technology, the potential beneficial impacts are difficult to quantify.

The effects of the displacement of air tours are thoroughly discussed in the EA as part of indirect impacts. Air tours outside of the ATMP planning area (i.e., at or above 5,000 ft. above ground level (AGL) or more than ½-mile outside the Park boundary) are not subject to the Act and are therefore not regulated under the ATMP. Routes outside of the ATMP planning area are difficult to predict and are necessarily speculative. Specific air tour routes, altitudes, and numbers of tours are not available for displaced air tours to assess noise and other potential indirect and cumulative impacts. However, Appendix F of the EA, *Noise Technical Analysis*, Section 8, considers this scenario finding that displaced air tours outside the ATMP planning area are unlikely to reach DNL 65 dB, the FAA's threshold for impacts. Specific routes and altitudes outside the ATMP planning area were not modeled due to the uncertainty associated where these routes might be located.

5. **Concern Statement:** Commenters suggest that the NPS provides no justification for the 5,000-foot limit for air tour operations. Commenters note that there is no aviation noise-related research that identifies this threshold for noise abatement, and it is higher than the FAA's recommended mitigation altitude for sensitive areas. Commenters suggest that the NPS does not provide data showing visitors are adversely impacted by this noise.

Agencies' Response: The implementing regulations of the Act found in 14 CFR Part 136 only applies to commercial air tour operations within ½-mile of the Park's boundary and below 5,000 ft. AGL, where the definition of a commercial air tour is any flight conducted for compensation or hire in a powered aircraft where a purpose of the flight is sightseeing over the Park, within ½-mile outside the Park's boundary during which the aircraft flew below 5,000 ft. AGL. (see 49 U.S.C. § 40128(g)(4); 14 CFR § 136.33(d)).

In terms of comment suggestions regarding aviation noise-related research that identifies this threshold for noise abatement, Section 3.6.2 of the EA, Environmental Consequences for Visitor Use and Experience and Other Recreational Opportunities, cites five different studies that identified the value and importance of soundscapes for visitors of parks. Further, the EA also cites four different studies that indicate aircraft noise negatively impacts visitor experience. The EA, including the noise analysis, quantifies the amount of time noise is over 52 dBA, a level at which speech is interrupted for interpretative programs. The EA sufficiently addresses the impacts of air tour noise on Park visitors. Additionally, although the NPS does not maintain a record/log of the number of complaints received at the Park, public comments received by the agencies during the ATMP process have indicated many Park visitors have been adversely impacted by air tour noise during their visits to the Park.

Adverse Impacts: Visitor Use and Experience / Recreation

1. **Concern Statement:** Commenters suggest that the EA is incorrect in assuming that air tour operators would continue to offer tours outside of the ATMP planning area. This may not occur, or the price could be increased due to fewer tours.

Agencies' Response: It is the operator's discretion whether or not they continue providing air tours outside of the ATMP planning area and the price charged. The EA does not determine whether the operators will continue operations outside of the ATMP planning area. However, as stated in the EA, the agencies acknowledge that there will continue to be opportunities for air tour operators to provide air tours outside the ATMP planning area that will provide a good view of the sculpture and it is reasonably foreseeable they will do so. The ATMP does not apply to air tours outside of the ATMP planning area.

Adverse Impacts: Socioeconomics

1. **Concern Statement:** Commenters suggest that the economic analysis in the EA is inadequate because it underestimates the difficulty of air tour operators repurposing their aircraft and business for different ventures; the economic effects on the town of Keystone are not adequately addressed; the agencies didn't consult with the operators; and no estimate of economic loss was provided.

Agencies' Response: The agencies feel the economic analysis is adequate. Due to the possibility of air tour displacement, it is unclear if there will be a reduction in the number of air tours that provide aerial views of the sculpture, because air tours will still be able to see the sculpture from flights outside of the ATMP planning area. Additionally, although the ATMP would limit the opportunities for air tour operators and ancillary businesses to generate revenue from tours conducted within the ATMP planning area, the ATMP does not preclude operators from making up this revenue generation in other ways such as using their aircraft for other business ventures or conducting air tours elsewhere within the region. As described in Section 3.7.2 of the EA, Environmental Consequences for Environmental Justice and Socioeconomics, operators may also choose to use their aircraft for other businesses or operations such as search and rescue, fire protection, resource mapping and assessment, and flight for life operations. Therefore, it is unlikely the ATMP would result in large socioeconomic impacts to the surrounding community, including those associated with changes to the community tax base associated with loss of industry. The agencies cannot speculate on the need to change an aircraft's set up or the cost.

The agencies consulted with the operators during the ATMP planning process. Air tour operators were included as consulting parties for the ATMP Section 106 process. The reporting numbers and the route information used for the modeling were provided by the operators. The agencies conducted a 30-day scoping period, seeking feedback from the public and other interested parties (including air tour operators) on the draft alternatives for the ATMP and the operators were able to comment on the draft ATMP and draft EA, as were members of the public.

2. **Concern Statement:** Commenters suggest that the economic impact to the local communities would represent \$45,000,000 over the next ten years, almost all of which would stay with the local community.

Agencies' Response: Due to the possibility of displacement (rather than abandonment), it is unclear if there will be a reduction in the number of air tours that provide aerial views of the sculpture, because air tours will still be able to see the sculpture from flights outside of the ATMP planning area.

Adverse Impacts: Wildlife/Biological Impacts

1. **Concern Statement:** Commenters suggest the ATMP should include a buffer of 2,640 ft. from historical peregrine nesting locations from April 1 - August 1.

Agencies' Response: It is unnecessary to have a 2,640 ft. (1/2-mile) buffer to protect Park resources since the ATMP prohibits air tours. Further, the ATMP planning area where air tours will be prohibited provides a half-mile (2,640 ft.) buffer around the perimeter of the Park.

2. **Concern Statement:** Commenters suggest that as a result of displaced air tours, the ATMP would result in adverse impacts on wildlife outside of the ATMP planning area where wildlife is less conditioned to the presence of people and unnatural sounds.

Agencies' Response: The agencies acknowledge that the proposed action could result in displaced flights. This type of shift in air tour activity is referred to as "air tour displacement," and could consist of air tour operators shifting routes or altitudes to just outside the ATMP planning area, some of which could result in additional noise to wildlife to the extent that they are present near the locations where the displaced air tours would occur. Further, the agencies disagree with the statement that wildlife outside the ATMP planning area are less conditioned to noise than wildlife inside the ATMP planning area, because wildlife move throughout the Black Hills and low-level air tours are also common outside the ATMP planning area. While it is difficult to predict with specificity if, where, and to what extent any air tours would be displaced to areas outside the ATMP planning area, including at altitudes at or above 5,000 ft. AGL, the effects of the displacement of air tours are discussed in the EA as part of indirect impacts and are included in Appendix F of the EA, *Noise Technical Analysis*. Specifically, the *Noise Technical Analysis* states that for overflight operations conducted by a Robinson R-44 helicopter at 500 ft. AGL, the number of daily operations over a 12-hour period it would take to exceed a day-night average sound level (DNL) of 65 dB (FAA's threshold for significance) is 1,086. Other aircraft currently operating within the ATMP planning area include the Cessna 206. The number of daily operations to exceed a DNL of 65 dB for this aircraft operating at 1,000 ft. AGL is 1,306.

3. **Concern Statement:** Commenters suggest that the EA does not provide evidence that wildlife in the Park is impacted by air tours. Commenters suggest that wildlife could be conditioned to the noise and visual presence of the aircraft because wildlife has been documented as being conditioned to disturbances in parks.

Agencies' Response: As discussed in Section 3.3 of the EA, Biological Resources, and in Appendix H, *Section 7 No Effect Memo*, noise from commercial air tours may impact

wildlife in many ways, including altered vocal behavior, breeding relocation, changes in vigilance and foraging behavior, and impacts on individual fitness and the structure of ecological communities (Shannon et al., 2016; Kunc et al., 2016; Kunc and Schmidt, 2019). These impacts may not always result in visual behavioral changes such as flushing. Wildlife have been documented showing a stress response to the presence of aircraft (Stockwell et al., 1991), including herd dispersal and running from the noise. There is no evidence that wildlife in the Park are conditioned to aircraft noise. The agencies considered the potential impacts of the ATMP on the Park's wildlife, including migrating birds. The ATMP is expected to have no effect on federally listed threatened or endangered species and to have no impacts on wildlife species or their habitat when compared to current conditions due to the prohibition of air tours.

Adverse Impacts: Wilderness Character Impacts

1. **Concern Statement:** Commenters request the agencies provide visitation numbers for the potentially affected Wilderness.

Agencies' Response: Approximately 2,440,449 visitors visited the Park in 2022. There are no specific visitation numbers available for the portion of the Black Elk Wilderness (managed by the U.S. Forest Service) that is partially located within the ATMP planning area. However, visitation data have been collected at two locations where visitors access the Black Elk Wilderness in the ATMP planning area: the Centennial #89B trail and the Wrinkled Rock Wilderness Access. Between 2020-2022, data suggest that the Average Daily Traffic was approximately 10 visitors per day (3,650 annual) at Centennial #89B and 7 visitors per day (2,555 annual) for Wrinkled Rock Wilderness Access.

2. **Concern Statement:** Commenters suggest that the agencies using Wilderness impacts as a reason to end air tours over the Park is inappropriate because the Wilderness is outside of the Park. Commenters suggest that banning air tours over the Park will result in an increase in air tours over Wilderness areas outside of the Park.

Agencies' Response: The agencies acknowledge that the Preferred Alternative could result in displaced flights and analyzed potential impacts that may result from such displaced flights as part of indirect effects analysis (see Section 3.5.2 of the EA, Environmental Consequences for Wilderness, and Appendix F of the EA, *Noise Technical Analysis*). Wilderness was considered as an environmental impact category because designated Wilderness (specifically the Black Elk Wilderness) is partially located inside the ATMP planning area. Additionally, the Black Elk Wilderness contributes to the Park's natural setting.

Further, the *Noise Technical Analysis* models noise over the portion of Wilderness inside the ATMP planning area. Time audible in this area for Alternative 4 (the alternative with the fewest flights) was modeled to be up to 90 minutes, while time above 35 dBA was up to 75 minutes. Location point 29 (Cultural Resource 2), which is inside the ATMP planning area, for Alternative 4 is modeled to have noise for 10 minutes over 52 dBA,

25.7 minutes over 35 dBA, and would be audible for up to 43 minutes. Therefore, the agencies decided a prohibition of air tours was needed to protect the Park's natural and cultural resources and that this prohibition also protects Wilderness character within the ATMP planning area.

Adverse Impacts: Cultural Resource Impacts

1. Concern Statement: Commenters disagree with cultural resource impacts described in the EA. Commenters describe the following points:

- No air tours are over native lands as defined by federal law.
- No physical impacts have been documented to sensitive cultural sites.
- No data related to impacts to "feeling and setting."
- Undertaking would have no effect on historic properties.
- Feelings of tribes are presented in a biased manner.
- The same impacts would occur if air tours were flown outside of the ATMP planning area.
- Cultural impacts could be greater under the ATMP as resources outside of the Park are less well documented.

Agencies' Response: The agencies conducted consultation with Tribal Nations, as required under NEPA and in accordance with Section 106 of the National Historic Preservation Act. While the ATMP planning area does not include tribal lands as defined by the Act, several tribes have ancestral connections to these lands and continue to use them for traditional cultural practices. The following responds to the individual points made by the commenter:

As the EA states, there are no anticipated physical effects to historic properties because there is no land acquisition, construction, or ground disturbance.

In regard to impacts to feeling and setting and the effect determination, as described in Section 3.4 of the EA, Cultural Resources, and in Appendix G, *Cultural Resources Consultation and Summary*, the identification effort focused on identifying properties where setting and feeling are characteristics contributing to a property's eligibility for listing under the National Register of Historic Places, as they are the type of historic properties most sensitive to the effects of aircraft overflights. This included properties where a cultural landscape is part of the property's significance, as an example. The agencies specifically considered whether air tours could affect the use of traditional cultural properties (TCPs) associated with cultural practices, customs or beliefs that continue to be held or practices today. The entire Park is listed in the National Register of Historic Places.

Throughout the Section 106 process, the agencies requested consulting party input to help identify historic properties within the Area of Potential Effects (APE). The agencies requested and received consulting party input on the potential effects of the

alternatives on historic properties throughout the Section 106 process. The agencies determined and received concurrence from the State Historic Preservation Officer and consulting parties, that the ATMP would not alter the characteristics of any historic properties located within the APE as there would be a reduction in audible or visual effects from existing conditions, resulting in a finding of no adverse effect on historic properties. Additional information on cultural resources can be found in Section 3.4 of the EA, Cultural Resources, and in Appendix G, *Cultural Resources Consultation and Summary*.

The tribal opinions, as well as all other Section 106 consulting parties, were obtained through the required Section 106 Consultation process as well as the scoping process and the public meetings.

Regarding the commenters' concerns related to cultural resource impacts as it pertains to the ATMP planning area, the EA addresses the impacts within the ATMP planning area as well as outside the ATMP planning area. Based on current air tour activity, the number of flights displaced outside the ATMP planning area could be similar to the number of flights currently operating within the ATMP planning area. The preciseness of routes and altitudes for tours flown on alternative routes are generally subject to Visual Flight Rules, which is based on the principle of "see and avoid", and therefore may vary.

Tribal Concerns

1. **Concern Statement:** Commenters claim that local Lakota tribe members were not in opposition to air tours at the Park.

Agencies' Response: The agencies conducted consultation with Tribal Nations, as required under NEPA and in accordance with Section 106 of the National Historic Preservation Act. The agencies consulted with official representatives from 23 tribes during tribal consultation specific to the Park, including Lakota tribes. The consulted individuals (Tribal Historic Preservation Officers and Chairpersons) are elected/appointed to review projects and provide official comment on behalf of the tribe they represent, as opposed to individual tribal members who may each have their own opinion. In the consultation meetings, the tribes represented at those meetings were overwhelmingly in support of the No Air Tours alternative (Preferred Alternative), including Lakota tribes.

2. **Concern Statement:** Commenters suggest that the law does not require that Park visitors' rights to experience the Park be subjugated to tribes' preferences. Commenters suggest that greater mitigation should have been required for continued air tours. Commenters recommend that the agencies state why increased air tour management was not proposed and include a cost/benefit analysis in the EA.

Agencies' Response: It is correct that the Act does not require tribal preferences to trump other interests, including visitors' rights. The Act provides that the objective of

an ATMP is to mitigate the significant impacts, if any, of commercial air tours on, among other things, visitor experience (see 49 U.S.C. § 40128(b)(1)(B)). The agencies' identification of the Preferred Alternative considered many factors, including but not limited to tribal input, Park resource protection, visitor experience, and socioeconomic factors. The ATMP would eliminate commercial air tour noise from air tours flying within the ATMP planning area for the approximately 2.2 million Park visitors each year and would thus be a direct beneficial impact to visitor use and experience within the ATMP planning area. The agencies considered this beneficial impact as well as the impacts to air tour patrons who may wish to view the Park via a commercial air tour.

Adverse Impacts: Visual Impacts

1. **Concern Statement:** Commenters suggest that the EA lacks a description of the visual impacts of air tours and suggest that air tours do not have the same adverse impact when applied to a more developed setting compared to that of a backcountry or Wilderness setting. The commenter suggests the setting in the Park is man-made and not natural, consisting of other man-made objects, such as roads, parking lots, vehicles, and the man-made sculpture itself.

Agencies' Response: The EA appropriately analyzed visual effects consistent with NEPA and FAA Order 1050.1F. Visual effects deal broadly with the extent to which the proposed action or alternative(s) would either: 1) produce light emissions that create annoyance or interfere with activities; or 2) contrast with, or detract from, the visual resources and/or the visual character of the existing environment. Section 3.8 of the EA, Visual Effects, provides a description of the affected environment and the environmental consequences of air tours from visual points of interest and viewsheds within the ATMP planning area.

Adverse Impacts: Equity

1. **Concern Statement:** Commenters suggest that the ATMP discriminates against visitors who have a mobility challenge, including the elderly, the very young, and those with physical disabilities, who may not be able to view the sculpture by other means. Commenters recommend that the agencies consult with the Americans with Disabilities Act. Commenters suggest that all visitors should have the ability to choose how to visit public spaces. Commenters suggest that although the Park's major features are accessible to visitors with disabilities, the Presidential Trail and all of the natural trails are not.

Agencies' Response: Air tours are only one of many ways for a person with disabilities to experience a national park. The NPS works to ensure that people with disabilities can participate in the same programs, activities, and employment opportunities available to those without disabilities in the most integrated setting possible. Alternative means of accessing facilities, programs, and services are provided when an accessible direct experience cannot be provided. Accessibility solutions are developed in consultation

with the disability community and various partners including NPS concessioners and commercial service operators. The NPS has a team dedicated to breaking physical and programmatic barriers to make parks more inclusive for people with sensory, physical, and cognitive disabilities. The team includes regional accessibility coordinators who work to make sure that NPS staff have the tools and training necessary to provide accessible and inclusive outdoor recreation and interpretation opportunities for park visitors and employees alike.

Specifically at the Park, there are multiple accessible parking spaces located in the parking garage, a curbside drop-off program, and a wheelchair ramp near level 6 that provides direct access to the main entrance. Directed upon entering the Park, passengers with mobility impairments may unload next to the main entryway. Elevators are available on all levels of the parking garages.

The Park also has a wheelchair loaner program with both standard and wide sizes of wheelchairs available to check out inside the Information Center. The Carvers' Cafe and Gift Shop are wheelchair accessible, and elevators are located at both sides of the Grand View Terrace to provide access to the visitor center and amphitheater. The Presidential Trail is surfaced to accommodate wheelchairs from the Grand View Terrace to viewing areas at the base of the sculpture.

Between 2019 and June of 2021, the Park made multiple visitor enhancements to the visitor center and plaza paver walking system from the parking garage to the Grand View Terrace. These improvements addressed visitor safety and accessibility concerns while improving operational and energy efficiency. Two new accessible elevators were installed on the Grand View Terrace, providing enhanced accessibility access to the visitor center and amphitheater, and companion seating was added along the Avenue of Flags and the Grand View Terrace for wheelchairs and mobility scooters. Lastly, the Park has programs available to assist visitors with hearing and visual impairments. Additional accessibility information can be found on the Park's website and NPS mobile app.

Adverse Impacts: Climate Change / Greenhouse Gases / Air Quality

1. **Concern Statement:** Commenters note that the ATMP would generally have minor impacts on air quality; however, commenters stated that air quality impacts may be shifted to outside of the ATMP planning area. Commenters suggest that air quality outside of the ATMP planning area affected with displaced flights warrants analysis.

Agencies' Response: The agencies analyzed the potential air quality impacts and determined that the Preferred Alternative would have direct beneficial impacts on air quality within the ATMP planning area. See Section 3.2.2 of the EA, Environmental Consequences for Air Quality and Climate Change, and Appendix E of the EA, *Environmental Impact Analysis Methods*, Section 4.2, Air Quality and Climate Change. The agencies acknowledge that that the proposed action could result in displaced flights

resulting in the potential for minor impacts to air quality. It is difficult to predict with specificity if, and where, and to what extent any air tours would be displaced to areas outside the ATMP planning areas, including at altitudes at or above 5,000 AGL. Specific air tour routes, altitudes, and numbers of tours are not available for displaced air tours to assess air quality and other potential indirect and cumulative impacts.

Adverse Impacts: Other

1. **Concern Statement:** Commenters suggest that the ATMP would create safety issues by compressing air traffic into a smaller corridor outside of the ATMP planning area.

Agencies' Response: The agencies analyzed the potential environmental impacts (including noise) and potential safety concerns as part of the ATMP development process. As noted in the ATMP, the pilot-in-command is required to take action to ensure the safe operation of the aircraft. The FAA reviewed the alternatives for safety and risk mitigation. The FAA will perform outreach with air tour operators and other stakeholders to encourage the development of an operational plan to enhance safety.

2. **Concern Statement:** Commenters stated that eliminating air tours will result in operators flying over the sculpture as commercial air transportation and utility flights, which are not regulated by the Act, and that the EA does not account for these flights.

Agencies' Response: The Act only applies to commercial air tour operations within the ATMP planning area, which includes the Park and ½-mile outside of the Park boundary and below 5,000 ft. AGL. The Act does not apply to overflights that are not commercial air tours conducted within the ATMP planning area, nor does it apply to air tours flying outside of the ATMP planning area. As part of the cumulative effects assessment, the FAA and NPS considered other ongoing and planned actions. The Park uses helicopters to transport Park personnel to various locations for resource protection activities, rescue, and facility maintenance activities, and these flights were considered in the EA under cumulative effects. The agencies do not have any basis to conclude that commercial air tour operators would recharacterize their flights as commercial air transportation or utility flights in order to fly within the ATMP planning area. Because these flights would still be considered air tours under the Act, non-compliance with the ATMP would be enforced as described in the ATMP.

3. **Concern Statement:** Commenters suggest that the ATMP would increase safety by aligning helicopter operator's routes near the sculpture to operate in same direction.

Agencies' Response: The preciseness of routes and altitudes for air tours flown on any possible displaced air tours outside of the ATMP planning area would be subject to Visual Flight Rules which is based on the principle of "see and avoid" and may vary. Specific air tour routes, altitudes, and numbers of tours outside of the ATMP planning area are at the operator's discretion, are difficult to predict, and are necessarily speculative. The pilot-in-command is responsible for safe operations. The FAA will continue to collaborate with air tour operators and stakeholders to mitigate risk.

- 4. Concern Statement:** Commentors estimate that 15,000 people participate in commercial air tours each year. They recommend that under the alternative where air tours are eliminated, the EA analyzes the impacts to the Park and Park infrastructure if those individuals visit the Park by land.

Agencies' Response: The number of Park visitors on an annual basis is estimated to be 2,440,449. The stated 15,000 commercial air tour patrons per year are only a fragment of Park visitation. If those patrons choose to visit the Park by land, any additional impact to Park infrastructure from these individuals would be negligible. See Section 3.6.1 of the EA, Affected Environment for Visitor Use and Experience and Other Recreational Opportunities, for additional information on trends in visitation. The EA acknowledges that the ATMP could potentially result in adverse effects to persons seeking the experience of seeing the Park or sculpture from an air tour. However, because the Park and sculpture would be visible from an air tour outside the ATMP planning area, these potential adverse impacts would likely be limited.

- 5. Concern Statement:** Commenters suggest that the NPS conservation mandate should serve as a key basis for evaluating impacts with both the proposed ATMP and EA focused on evaluating potential impacts of commercial air tours on the Park's natural and cultural resources, visitor experiences, and tribal lands in and adjacent to the Park. Commenters recommend that the EA include a section on the NPS Organic Act, from which the NPS draws its conservation mandate.

Agencies' Response: The NPS has considered applicable laws and policies in the development of the ATMP and EA, including its Organic Act. A list of applicable laws and policies is not required content for EAs. See 40 CFR § 1501.5. Consistent with NPS guidance, NPS has included a non-impairment determination as an attachment to the Record of Decision. The non-impairment determination is the required documentation demonstrating compliance with the NPS Organic Act.

- 6. Concern Statement:** Commenters suggest that because air tours are likely to continue outside of the ATMP planning area that agencies engage and consult with other jurisdictions to urge protection for natural and cultural resources.

Agencies' Response: The agencies acknowledge that the proposed action could result in displaced flights and analyzed potential impacts that may result from such flights. The agencies provided those jurisdictions where displaced flights could occur with an opportunity to provide comments. The U.S. Forest Service manages a substantial amount of land outside the ATMP planning area and was a cooperating agency in the development of the EA. The agencies also consulted with tribes under Section 106 of the National Historic Preservation Act and coordinated with the U.S. Fish and Wildlife Service under Section 7 of the Endangered Species Act. Notices were also specifically sent to state and county officials and local municipalities for opportunities to provide public comment.

Alternatives: Alternative 3 - Mitigation Measures

1. **Concern Statement:** Commenters suggest that the agencies should consider horizontal and vertical route adjustments as mitigation.

Agencies' Response: The agencies looked at a reasonable range of alternatives (see Chapter 2 of the EA, Alternatives). The agencies did not include horizontal or vertical route adjustments in any of the action alternatives because of safety concerns.

ATMP Elements: Annual Number of Air Tours

1. **Concern Statement:** Commenter suggested reducing the number of helicopters in the air at any given time to two per operator, stagger take off times by 10 minutes, and increase the shortest duration of flights offered to increase time between noise exposures.

Agencies' Response: The agencies considered a reasonable range of alternatives, including mitigations. Many mitigation ideas were considered, and four alternatives were analyzed. Alternatives 3 and 4 included a reduction in air tours, which would have increased the time between noise exposures and more generally reduce noise from the existing conditions, similar to the commenter's suggestion. Alternatives 3 and 4 also included limits on the number of air tours conducted on days when air tours would be permitted. Alternative 2, which prohibits air tours within the ATMP planning area, was selected because it provides the greatest protection to Park resources and best meets management objectives.

ATMP Elements: Routes and Altitudes

1. **Concern Statement:** Commenters suggest a route that is 0.52 nautical miles away from South Dakota Highway 244 at an elevation of 6,000 ft. mean sea level (1,364 ft. AGL), 137 degrees southeast of the visitor center. Commenters state that this route would maximize safety, consolidate noise along the roadway, and balance viewing opportunities. Commenters provide that this alternative would reduce noise below the 52 dBA threshold for 95% of Park visitors.

Agencies' Response: This proposal was not included in the alternatives reviewed, however the agencies looked at a reasonable range of alternatives (see Chapter 2 of the EA, Alternatives). While the comment provides the closest point of viewing, it does not provide specific route details that would allow for proper modeling of impacts. The agencies believe the Preferred Alternative is necessary to protect Park resources.

ATMP Elements: Aircraft Type

1. **Concern Statement:** Commenters suggest that fixed-wing aircraft and helicopters generate different noise levels and have different impacts. Commenters suggest that the agencies analyze the two aircraft types separately.

Agencies' Response: The Aviation Environmental Design Tool (AEDT) model used by the agencies for the ATMP and EA analysis takes the different noise signatures for both fixed wing and helicopter commercial air tours into consideration. The combined impacts of both aircraft types were considered in the analysis in Section 3.1.2 of the EA, Environmental Consequence for Noise and Noise-Compatible Land Use. Noise impacts from each type of aircraft were not analyzed separately. The reporting numbers at the Park reveal that 99% of flights are flown by helicopter. Thus, a separate analysis of noise from fixed-wing aircraft is not warranted. Additional information about noise modeling can be found in Appendix F of the EA, *Noise Technical Analysis*.

ATMP Elements: Other

1. **Concern Statement:** Commenters suggest that the agencies adopt an agreement similar to the one adopted by the FAA and the helicopter company FLYNYON, based in New York City.

Agencies' Response: The Act allows the agencies to develop an ATMP or a voluntary agreement. The agencies determined that an ATMP is best suited for the Park.

2. **Concern Statement:** Commenters suggest that failing to include a competitive bidding plan in the ATMP creates a monopoly.

Agencies' Response: Because the agencies have selected Alternative 2, which prohibits air tours within the ATMP planning area, there is no need for a competitive bidding process. The Act does not apply to operations outside of the ATMP planning area.

ATMP Elements: Safety

1. **Concern Statement:** Commenters suggest that safety was not adequately considered during the planning process. Commenters suggest that the Flight Standards District Office should have been consulted and a risk analysis conducted. Commenters suggest that accidents will be more likely under the ATMP due the compression of routes outside of the ATMP planning area.

Agencies' Response: As a part of the FAA agency review, the Flight Standards District Office (FSDO) was consulted on the safety-aspect of the alternatives. The FAA will perform outreach with air tour operators and other stakeholders to encourage the development of an operational plan to enhance safety. As noted in the plan, the pilot-in-command is required to take action to ensure safe operations.

Process Comments: Other

1. **Concern Statement:** Commenters suggest that the agencies should have completed voluntary agreements rather than ATMPs, and that many of the statements made by the NPS are not supported by evidence.

Agencies' Response: The Act allows the agencies to develop an ATMP or a voluntary agreement. The agencies determined that an ATMP is best suited for the Park. It is unclear which statements the commenter contends are not supported by evidence. See Section 1.4 of the EA, Purpose and Need, and Section 5.0 of the ATMP, Justification for Measures Taken for additional information.

2. **Concern Statement:** Commenters suggest that the scope and content of the Mount Rushmore National Memorial and Badlands National Park EAs are inappropriately similar given the differences in the two NPS units. Commenters suggest that the process was rushed and haphazard in approach. Commenters suggest that the NPS had an agenda in selecting Alternative 2.

Agencies' Response: Similarities between the EAs would be expected in many cases because the parks have many of the same stakeholders, affiliated tribes, and air tour operators and because both ATMPs are being prepared pursuant to the Act. However, the EAs are distinct and consider impacts to resources and visitor experience for each individual park. The planning effort for the ATMP, the process for developing alternatives, and the extensive consultation conducted by the agencies are all discussed in the EA. The agencies identified Alternative 2 as the Preferred Alternative because it provided the greatest level of protection for the purposes, resources, and values of the Park, as well as Park's management objectives, and is the most responsive to tribal concerns.

The NPS's decision making is guided by the 1916 NPS Organic Act. Specifically, the NPS Organic Act requires the NPS "to conserve the scenery and the natural and historic objects and the wildlife [within National Park System units] and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." See Section 5.0 of the ATMP, Justification for Measures Taken, and Section 2.5 of the EA, Alternative 2 (Preferred Alternative). The NPS's mandate to conserve park resources and values "applies all the time with respect to all park resources and values, even when there is no risk that any park resources or values may be impaired" (NPS Management Policies Section 1.4.3, 2006).

3. **Concern Statement:** Commenters suggest that the ATMP planning process was not conducted according to the requirements of the Act and did not include safety and economic impact analysis.

Agencies' Response: The agencies complied with the Act, NEPA, and all other applicable environmental laws in the development of the ATMP. The EA includes a socioeconomic analysis for the alternatives considered. Also, the FAA reviewed the safety-aspects of the alternatives.

- 4. Concern Statement:** Commenters note that the agencies did not meet with the National Parks Overflights Advisory Group (NPOAG) during the ATMP planning process, and they suggest that the agencies did not use staff with expertise in operations or safety.

Agencies' Response: The agencies held many virtual meetings with the NPOAG since the planning process began in 2020. In September 2020, the agencies discussed the plan and schedule submitted to the U.S. Court of Appeals for the District of Columbia Circuit for ATMP development. In January 2021, the NPOAG meeting included a more detailed discussion of the agencies' approach to ATMP development. During this meeting, the NPOAG provided input on the agencies' approaches to defining current air tour conditions, which was determined to be the three-year average from 2017-2019. During the September 2021 NPOAG meeting, the agencies discussed draft ATMPs being released over the August to October 2021 timeframe.

In addition to these three virtual meetings, the agencies held an in-person NPOAG meeting in June 2022 in Fort Collins, Colorado, where the agencies shared detailed information on the status of ATMP development at each of the 24 park units and heard the issues, concerns, and input from the NPOAG. The most recent NPOAG meeting was held in person in March 2023. The agencies also shared progress updates submitted to the Court at 90-day intervals with the NPOAG and provided additional updates when and where appropriate.

The agencies sought input from the NPOAG on appropriate matters during these virtual and in person meetings. However, the NPOAG was not given deliberative information during the ATMP planning process, nor were the agencies required to provide such information to the NPOAG. All information shared with the NPOAG is shared with the public. Further, the agencies continue to meet and consult with the NPOAG with the latest meeting being held in March 2023.

The duties of the NPOAG as listed in the Act, Section 805, state that NPOAG will provide advice, information, and recommendations to the Administrator and the Director on:

- a. The implementation of the National Parks Air Tour Management Act of 2000 and the amendments made by this title;
- b. 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;
- c. Other measures that might be taken to accommodate the interests of visitors to national parks; and
- d. 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.

As discussed in the March of 2023 NPOAG meeting, NPOAG is an advisory group to the agencies. ATMPs are not aviation rulemaking. The ATMP development process is following the Act, NEPA, Section 106 of the National Historic Preservation Act, and Section 7 of the Endangered Species Act.

The NPOAG has provided and will continue to be asked to provide input on the process and factors that may impact all ATMPs. For example, the NPOAG provided the agencies information about aircraft flight monitoring systems that were included in Alternatives 3 and 4 in the EA and included in ATMPs for other parks. NPOAG members were also specifically alerted to the comment period opportunities, including both the scoping and public review of the draft ATMP and draft EA.

As part of the planning process, the FSDO was consulted on the safety aspect of the alternative development as well as provided an opportunity to review and comment before the draft documents were published for public comment.

Process Comments: NEPA

1. **Concern Statement:** Commenters recommend that the EA include an appropriate use analysis as described in Section 1.5 of NPS Management Policies, another applicable laws section including discussion of the Organic Act, and an impairment determination with the final EA and decision document.

Agencies' Response: The NPS is not required to document an appropriate use analysis, though it may choose to do so voluntarily. However, an appropriate use analysis is not needed for the ATMP because it prohibits commercial air tours within the ATMP planning area. Consistent with NPS practice, a non-impairment determination is attached to the ROD.

2. **Concern Statement:** Commenters suggest that Section 8.0 of the ATMP should be revised and described in the EA. Commenters are concerned that the statement, "the ATMP may be amended at any time" creates an impression that the decision could be reversed on relatively short notice. Commenters suggest alternate wording: (add new first sentence) This ATMP will remain in effect until amended or terminated by mutual agreement of the agencies. This ATMP may be amended at any time (i.e., delete: "at any time"): if the NPS, by notification to the FAA and the operator(s), determines that the ATMP is not adequately protecting Park resources and/or visitor enjoyment; if the FAA, by notification to the NPS and the operator(s), determines that the ATMP is adversely affecting aviation safety and/or the national aviation system; or, if the agencies determine that appropriate changes to this ATMP are necessary to address new information or changed circumstances.

Agencies' Response: Section 8.0 of the ATMP is needed because the ATMP may need to be amended sometime in the future for any number of reasons. For example, the ATMP may need to be amended if the ATMP is not adequately protecting Park resources

and/or visitor enjoyment, adversely affecting aviation safety and/or the national aviation system, or if the agencies determine that appropriate changes to this ATMP are necessary to address new information or changed circumstances. The agencies do not agree that their decision could be reversed on short notice. The Act requires any ATMP amendments to be published in the Federal Register for public notice and comment (see 49 U.S.C. § 40128(b)(6)). Further, any amendment that would permit commercial air tours within the ATMP planning area would require additional environmental review.

Correspondence ID: 1Project:97377Document:128168
Name: McCorkle, Aissa
Received: May,16 2023 12:41:27
Correspondence Type: Web Form
Correspondence: I think we should do everything we can to limit the number of air tours for Mount Rushmore so that they do not exceed the current allowance. There is so much noise pollution that comes with the air tours.

If it were possible to have less than what is currently allowed, I think that would be ideal.

Correspondence ID: 2Project:97377Document:128168
Name: Rosenau, James
Received: May,16 2023 17:54:11
Correspondence Type: Web Form
Correspondence: I have taken the helicopter tour over the Black Hills and loved it!
The pilots are safe and informative!
They don't make that much noise!
If you want to cut down on the noise in the hills, what will you think of next?
The rally, the off road vehicles, Ellsworth AFB???
I love all the noises, and they all attract PEOPLE!
Leave it alone, support business!

Correspondence ID: 3Project:97377Document:128168
Name: ,
Received: May,16 2023 18:19:08
Correspondence Type: Web Form
Correspondence: I wish the helicopter tours would be eliminated or greatly reduced over the entire Black Hills National Forest. The noise really takes away from the peaceful enjoyment of the area. There are times it is just a constant roar of the helicopters over and over as they pass over area lakes and sites.
Thank You.

Correspondence ID: 4Project:97377Document:128168
Name: ,
Received: May,16 2023 18:47:14
Correspondence Type: Web Form
Correspondence: There is absolutely no reason to restrict flights over Mt. Rushmore and the Badlands. Unless you want to crush the local tourist economy, then by all means, go ahead.

Having been to both Mt. Rushmore and the Badlands multiple times, I have never once been bothered by helicopters or other flight tours. This is a ridiculous proposal that has no business existing.

Correspondence ID: 5Project:97377Document:128168
Name: Peterson, Michael G
Received: May,16 2023 18:49:46
Correspondence Type: Web Form
Correspondence: My wife and frequently hike trails in the Black Hills National Forest very near Mt Rushmore. Many times we have been all alone getting the ability to enjoy nature and our surroundings only to have one or more helicopters come flying over making a enormous racket. Any claim that these flights are to the benefit of the disabled is disingenuous, Mt Rushmore and the Badlands have done a wonderful job making their facilities handicapped friendly.

Correspondence ID: 6Project:97377Document:128168
Name: Martina, Bartholomew J

Received: May,16 2023 18:58:24

Correspondence Type: Web Form

Correspondence: Please do not take away ariel access to Mt. Rushmore, as this disproportionately affects the elderly, like my wife and I and the handicapped. These tours are safe and not hurting anyone or the park. Not to mention putting people out of business who have been providing a valuable service for this disaffected demographic, safely for decades, in the spirit of freedom that Mt. Rushmore represents.

With sincere thanks,

Bartholomew and Cynthia Martina.

Correspondence ID: 7Project:97377Document:128168

Name: Proulx, Mark P

Received: May,17 2023 06:13:11

Correspondence Type: Web Form

Correspondence: We stayed in a nearby campground several years ago that was plagued with the constant noise of aerial tours. Literally woke us up every morning and put us to bed every night. The noise surrounding this spectacular monument is reason enough to put major restrictions on when these tours take place. I would not be in favor of completely eliminating them since I know families livelihoods depend on that business, but it definitely would make for a better visitor experience to the area with less tours.

Correspondence ID: 8Project:97377Document:128168

Name: Klimas, Steven T

Received: May,17 2023 07:14:05

Correspondence Type: Web Form

Correspondence: I believe the helicopter trips allow the experience of the Badlands for visitors from a unique vantage point not allowed from the ground. As cited by the operators " people with disabilities or aged" that cannot maneuver in the traditional visit get to experience the Badlands and Rushmore through this unique experience. It expands the opportunities and allows and increases the awareness of the vast landscape and beauty of this one of a kind geological attraction. The trips also provide revenue for the area and increase opportunities for a complete experience for everyone. I have visited the Badlands National Park and surrounding attractions many times and have never deemed the Helicopter tours to degrade or distract from the inspiring landscape.

There are options to completely ending this unrepeatabe contact with the park.

Please work in tandem with the tour operators if modifications are necessary but do not completely end this one of a kind service.

Correspondence ID: 9Project:97377Document:128168

Name: , Maddy

Received: May,17 2023 07:14:54

Correspondence Type: Web Form

Correspondence: I am in support of this Air Tour Management Plan because it will reduce impacts on wildlife, wildlife viewing, and rock-climbing.

Correspondence ID: 10Project:97377Document:128168

Name: Springer, James

Received: May,17 2023 07:22:34

Correspondence Type: Web Form

Correspondence: While I understand the beauty of nature as I am a hiker, to restrict even more flights I believe is a move in the wrong direction. As a grandparent with a child that has disabilities if one individual gets to see this magnificent part of American history and it helps them dream who they could be 5000 flights a year is worth it. Please think of all the good people can get out of a flight close to something that is not accessible in any other way let it be.

Correspondence ID: 11Project:97377Document:128168

Name: Thesing, George

Received: May,17 2023 07:49:28

Correspondence Type: Web Form

Correspondence: To whom it may concern:

Though I live in western Minnesota, I grew up in Eastern SD and have visited the black hills/mt Rushmore many many times. I feel that the helicopter tours of mt Rushmore and the black hills adds to the experience of viewing the national monument from a different perspective for people of all ages, nationalities, and disabilities. They do not "hover" in from of the faces and obscure the views, and the minor "noise" seems to be pretty mild in my opinion. Were will the "complainers" quit? Will it be No Harley Davidsons in the park next because of the loud exhaust? I have no affiliation with any flying company or service, so Let's be real, I believe the article stated that the current operation has been flying people for over 30 years... leave them be, and let them continue to fly and give tourists the opportunity to view and see our beautiful parks from all aspects.

Sincerely

George Thesing

Correspondence ID: 12Project:97377Document:128168

Name: Surprenant, Denis

Received: May,17 2023 08:19:40

Correspondence Type: Web Form

Correspondence: Let the helicopters fly. By shutting them down you'd essentially be putting those businesses out of business. We have enough of a problem with jobs in this country that we don't need any more. I would be open to altitude restrictions to prevent disturbing wildlife, but helicopters flying overhead should have no affect on the conservation of the national parks.

Correspondence ID: 13Project:97377Document:128168

Name: Meuer, Tim

Received: May,17 2023 08:24:55

Correspondence Type: Web Form

Correspondence: Not being a resident of South Dakota I hope this comment is still well received. I am an avid hiker and a budding climber, usually taking around ten major sorties a year. In 2021 I visited the Sylvan Lake recreation area for the first time and spent around three days hiking various trails within that network. I loved the beauty, the solitude, and the quiet that the trails offered. However on the weekend I found that about every 30 minutes that solitude and quiet was disturbed on a very jarring manner as a helicopter passed overhead, did circles and laps for a few minutes, then would fade off into the distance. At first it was not an issue but over the span of the weekend I spent hiking these trails, it became extremely annoying, as many of the trails in that network take a few hours to traverse. It ruined the beauty and took the Sylvan lake experience from a 10/10 down to about a 3.

I returned to the Black Elk wilderness thinking that I would like to see if that area has fewer helos. After the first experience I did not want to pay for the Sylvan Lake experience, so I found a free parking lot on the north edge of the wilderness and ventured in that way. Glad I did not pay, because once again the natural beauty and solitude of the wild was disrupted by a loud chopper flying and circling around overhead, not just once, but again like clockwork, with a maximum of an hour in between flights. For this reason alone I have chosen to visit other areas and don't plan to return to the sylvan lake, state game lodge, mt Rushmore, black elk peak, needles, or surrounding area. I am excited at the prospect of this nuisance being limited or removed, and would love to return and recommend these areas of immense beauty and wonderfully built trails to my fellow hikers from out of state. As it stands currently I personally have chosen to go to the Cloud Peak wilderness, big horn recreation area, or colorado Rockies trail systems and recommend the same to others visiting the area. It's a shame as I think that the black hills of South Dakota are objectively more beautiful, with better trails that are better maintained.

I do understand the aerial tour companies' mobility argument, but the area has an extensive road network that is well developed and maintained. Why can't the mobility-challenged person enjoy the areas beauty in a land vehicle on the extensive roads? Specifically Mt Rushmore which has all the accessibility options a mobility challenged individual could want.

Correspondence ID: 14Project:97377Document:128168
Name: McMahon, Conor
Received: May,17 2023 08:41:42
Correspondence Type: Web Form
Correspondence: I full support prohibiting all air tours inside Mt Rushmore NM and Badlands NP. I have lived in the area for over 10 years and visited both parks countless times. The helicopter tours are highly disruptive during park visits and negatively impact the quality of the experience in a natural area.

Correspondence ID: 15Project:97377Document:128168
Name: ,
Received: May,17 2023 08:48:50
Correspondence Type: Web Form
Correspondence: The central region of the Black Hills is an area I hike several times a week throughout the year. The helicopter tours during the busy season only add to the already noisy traffic. The helicopters make it impossible to enjoy the serenity of nature as it's meant to be enjoyed. I support the elimination of these annoying flights.

Correspondence ID: 16Project:97377Document:128168
Name: braun, patricia
Received: May,17 2023 09:07:03
Correspondence Type: Web Form
Correspondence: There should be NO air traffic (except emergency) within a 5 miles of ANY national park let alone a small park like Mount Rushmore. Please, place a wider 'no fly zone' around the area! That said, knowing there already are helicopter tours of the area....
make the permit to fly up to (my wish of 5 miles) the range, a limit to 2 companies leasing the right to fly.
They have to pay for the privilege, are limited to how many flights a day, times of day, and hovering time at the destination.
They are to be muffled for noise as much as possible.
They will be reviewed for maintenance of lease every year.
Are allowed to have one aircraft in the air at a time (2 total, one per company).
Will have lease revoked if 10 (or fewer) complaints are filed against them, regardless of who is in violation, both companies will be revoked (this would have both companies working with each other to ensure compliance as aircraft are difficult to identify from the ground).
It's all extreme but, the solitude and reverence for the area is in decline. National parks NEED to be preserved, not sold off to the highest bidder! The elitist maneuver of flying over the monument is wrong and shouldn't occur but, it's already here, regulate it to the max AND make the privilege of that flight/business profitable for our Park!
Whew! Sorry for the rant..do not get me started on fireworks (of which I have written gov Noem to cease that juvenile, expensive, dangerous, trivial wish she wastes time and money on). AND ATVs! ugh!
Thank you, I don't know how you all do it!

Correspondence ID: 17Project:97377Document:128168
Name: Pearce, Randy D
Received: May,17 2023 09:07:14
Correspondence Type: Web Form
Correspondence: Have toured by air and what a beautiful experience it was. It would be a shame to deprive others of it. Sounds like another radical woke agenda trying to destroy the great freedom real Americans enjoy!

Correspondence ID: 18Project:97377Document:128168
Name: Burden, Laura
Received: May,17 2023 10:16:04
Correspondence Type: Web Form

Correspondence: We applaud the proposed elimination of helicopter commercial tours. There are becoming fewer and fewer places we can go to be immersed in the serenity of nature. The Black Hills is a special place but it is also a small area which is easily surrounded by noises of all types. The wildlife, which is a big part of why we are fascinated by hiking, are dependent upon us to keep that serenity available to them. It is important that we learn to set boundaries before it is too late. While some may say the right to make money is sacred, they are able to move elsewhere to engage in that activity. The wildlife are running out of spaces to do that.

Correspondence ID: 19Project:97377Document:128168

Name: Finley, Noel

Received: May,17 2023 10:21:44

Correspondence Type: Web Form

Correspondence: They should be allowed to fly over government has no problem putting in a parking garage to charge you to go in to see the national monument next they'll probably buy their own helicopters shame they're so greedy to charge you to see the monument

Correspondence ID: 20Project:97377Document:128168

Name: Wiswell, Jim A

Received: May,17 2023 10:27:10

Correspondence Type: Web Form

Correspondence: This is another one of biden hideous seems to hurt south dakota..

Correspondence ID: 21Project:97377Document:128168

Name: Rae, Roger M

Received: May,17 2023 12:13:36

Correspondence Type: Web Form

Correspondence: The idea of eliminating these flights due to noise is ridiculous. I personally will probably never take one of these tours but believe they are important to many. If we're worried about noise pollution there are worse issues. motor cycles are a far greater noise problem. I'm sure no one would try to limit them.

Correspondence ID: 22Project:97377Document:128168

Name: Lindsey, Janet

Received: May,17 2023 12:21:47

Correspondence Type: Web Form

Correspondence: I understand that some people find they want the "adventure" of an aerial view of the area. What I find they don't respect is that Mt. Rushmore is adjacent to the Black Elk Wilderness. It is absurd that while you are hiking in the "wilderness area" you are constantly buzzed by helicopters.... far from a wilderness experience. If aerial viewing continues, please find a way to limit their flight path not to cross the wilderness area. Thank you

Correspondence ID: 23Project:97377Document:128168

Name: Owens, Deanna K

Received: May,17 2023 13:25:51

Correspondence Type: Web Form

Correspondence: I had lived in Keystone, SD for 16 years and am well aware of how obnoxious the helicopters are there and in the surrounding areas of the Black Hills. The residents of Keystone complained many, many time about the disturbance they made all day long from spring through fall. I also hike all over the Black Hills and will not hike in the Mt Rushmore and surrounding areas because when you are hiking you want the peace and quite of nature to surround you, not the noise of many helicopters going over repeatedly during your whole hike. It is the same in the Custer/Crazy Horse area. The Mickelson Trail and the Centennial Trail both run along all of these areas. I have also been on the top of Black Elk wilderness when a helicopter circled and returned to hover over us while we made a gesture to them for disturbing out peace. The tourist in the helicopter were laughing and taking pictures. Nice, right.

I am all for making our National Memorials and National Parks and surrounding areas a much needed peaceful area that we all may enjoy.

Correspondence ID: 24Project:97377Document:128168
Name: Owens, Daniel
Received: May,17 2023 13:29:05
Correspondence Type: Web Form
Correspondence: AS a former resident of Keystone I have had many instances of being subjected to the nuisance of helicopters in Mt. Rushmore National Memorial and in the adjoining Black Elk Wilderness. They have dramatically reduced the enjoyment of the visits. I would think there is ample opportunity for anyone to visit the Monument without having to rely on a helicopter. The same for the Badlands National Park where the wilderness experience is amazing.

Correspondence ID: 25Project:97377Document:128168
Name: N, Brady
Received: May,17 2023 14:37:13
Correspondence Type: Web Form
Correspondence: Being a Black Hills resident for many years, seeing the increase in helicopter traffic within the ATMP and surrounding area has been incredible. As an avid climber, I am able to count 15-20 overflights by helicopter within a 3 hour session that would be considered disruptive to the point of not being able to speak with a fellow climber. It seems the tour operators answer to the question, "how many flights do you think is a reasonable amount?" is an adamant "more". As interest in the Black Hills area increases, I would not be surprised to see an increase in flights. Reading through the draft EA, I'm happy to see Peregrine Falcons mentioned and the likely disturbance from helicopters (climbers, too, can cause major problems with Peregrine). However, Peregrine and Eagles are the tip of the iceberg if considering disturbance to raptors, as there are likely many raptors nesting within the ATMP and surrounding area. If trying to protect the likely use of the monument by Peregrine Falcons, your ATMP should include the suggested standoff distance of 2,640 ft from historical eyrie locations from April 1 - August 1 (or at least July 20) to allow for successful fledging. I support Alternative 2, and to a lesser degree Alternative 4. I really do hope the USFS follows your lead and extends something similar to the wilderness area. Thanks for your time and your service.

Correspondence ID: 26Project:97377Document:128168
Name: Dahn, Laura
Received: May,17 2023 15:30:52
Correspondence Type: Web Form
Correspondence: First of all, if the supporters of this ban are genuine, about having quiet and peaceful enjoyment of the Black Hills as one of the main spokesman stated on the news on Tuesday evening , then ban all motorcycles too! I personally think the helicopters provide a fantastic service to those who for whatever reason cannot view Mt Rushmore (especially after the atrocity of a parking area was built). Please allow them to continue to provide this valuable service to their community or ban all vehicles that make noise!

Correspondence ID: 27Project:97377Document:128168
Name: Wheeler, Brandon
Received: May,17 2023 16:32:23
Correspondence Type: Web Form
Correspondence: Aerial tours should be allowed to continue without any further restrictions or reductions.

Correspondence ID: 28Project:97377Document:128168
Name: Lee, Sandra
Received: May,17 2023 21:54:32
Correspondence Type: Web Form
Correspondence: I do not want to see the helicopter services limited. I enjoy having the choice to ride in a helicopter for more personal experience. If this choice is taken away I feel will be limiting those of us who are not able to experience

Mt.Rushmore in other ways due to physical limitations.Please do not take this away for us.
Thank you

Correspondence ID: 29Project:97377Document:128168
Name: Anderson, Brandon
Received: May,17 2023 22:05:14
Correspondence Type: Web Form
Correspondence: I see no harm in flying over these public lands, within the FAA standard elevations per aircraft type. Environmental groups have for decades been trying to eliminate (successfully, in many cases) access to public lands. Many types of land vehicle use have already been restricted, with increasing restrictions over the years. Now they are trying to incrementally restrict air access over public lands. If this trend continues, eventually we won't even be able to walk on public lands.
Please halt this proposed air travel restriction.

Correspondence ID: 30Project:97377Document:128168
Name: Guthmiller, Tina
Received: May,18 2023 03:34:47
Correspondence Type: Web Form
Correspondence: It would be very sad to eliminate sightseeing yours. This is the only way my elderly parents were able to enjoy the view as my Dad had real bad health issues and couldn't walk far before he passed. The tours have been a staple fixture for 30 years without problems. The companies respect the nature environment and their passengers. There are way more important things the government should be worrying about in protecting our lands. The southern border is just one example. Leave us alone up here in the far north. We aren't hurting anything by sightseeing tours

Correspondence ID: 31Project:97377Document:128168
Name: Riegel, Jimmie
Received: May,18 2023 05:18:58
Correspondence Type: Web Form
Correspondence: I grew up in Western South Dakota and those corporations and the pilots have been fly over the Black Hills, Mt Rushmore and the Badlands for decades. They provide a much needed option for those with disabilities and the older folks. No one was upset until a certain environmental group found "fault" with it.

Correspondence ID: 32Project:97377Document:128168
Name: Faas, Karen
Received: May,18 2023 06:44:23
Correspondence Type: Web Form
Correspondence: I would be extremely happy if you would eliminate or drastically reduced the number of helicopter tours. They are using the excuse of people who are too old or infirm to view on their own. If you have to make it available only to people who cannot view without the aid of a helicopter. I've seen the people writing these helicopters they're not infirm. The noise is extremely dips disruptive to people who are trying to enjoy the peace and sanctity of the Black hills. Please don't sacrifice us to pacify these people who just want to make a dollar. There are plenty of ways to profit from the hills without making it unpleasant for the rest of us. Have some respect.

Correspondence ID: 33Project:97377Document:128168
Name: ripple, dennis j
Received: May,18 2023 08:54:32
Correspondence Type: Web Form
Correspondence: the tranquility of the black hills is unsurpassed!!! the constant noise pollution and visual distraction of the helicopter tours over mt rushmore in keystone and the surrounding black hills has been more than just a distraction!it has been an invasion of everyones personal space from fishing at horsethief lake to enjoying some quiet time on the trail. the tours need to be regulated and reduced!

Correspondence ID: 34Project:97377Document:128168

Name: Olson, Leanne M

Received: May,18 2023 09:02:41

Correspondence Type: Web Form

Correspondence: Comments about helicopters in Black Hills and Badlands. I've hiked all over in the Hills and they're especially annoying on Cathedral Spires and surrounding trails. They fly way too low and there's several going at all times. Anytime after 10am, which ruins the peaceful Hills. I hike to get away from the noise.

1. Ceiling needs to be raised to 7000 feet. Cathedral Spires is over 6500.
2. Shouldn't fly before noon on any day.
3. 2 days of the week, no flights.
4. Limit flight season. They start the minute the weather allows, so there isn't a chance for a local to enjoy the Hills without dealing with that level of noise.

If you ever doubt what I am saying, just go to Cathedral Spires. They'll buzz you and you will see what I mean. I was surprised they were allowed to fly so low. If they have a mechanical issue and crash, there will be little time for the pilot to react because they are just above the trees at times.

Correspondence ID: 35Project:97377Document:128168

Name: Larson, Joshua

Received: May,18 2023 09:15:48

Correspondence Type: Web Form

Correspondence: I would like to see a reduction in both the number of flights and an increase of the altitude in flights. In my time exploring the Black Elk Wilderness I was frequently disturbed by overhead flights to Mount Rushmore that greatly diminished my experience of solitude. When a loud intrusive helicopter comes by every 30 minutes it really doesn't feel like a wild experience. They would also come very close to Black Elk Peak at an altitude that I am very confident violated the protected air space of the tower and the wilderness that surrounds it.

Correspondence ID: 36Project:97377Document:128168

Name: Frey, Matthew S

Received: May,18 2023 09:49:25

Correspondence Type: Web Form

Correspondence: I would at least like to see regulation of the tours such that they are limited to only one flight per 2-4 hour window. During peak season when they are in full operation there is almost a constant loud overhead noise from low flying helicopters from Horsethief Lake all the way through Custer State Park, which is very disruptive and obnoxious for hikers and campers trying to enjoy the atmosphere. This region is essentially ruined for these purposes during peak season. Allowing the operators to continue flying but on a significantly reduced schedule will allow them to stay in business by charging more and/or requiring more advanced scheduling without totally banning them and ruining their businesses / investments and I think is the right compromise. In essence though I believe overall that the constant droning of loud overhead machines is anathema to the spirit and intent of national parks and wildlife areas and should be mitigated.

Correspondence ID: 37Project:97377Document:128168

Name: Stone, Timothy P

Received: May,18 2023 12:20:05

Correspondence Type: Web Form

Correspondence: I support air tours over Mt. Rushmore. Air tours are a great addition to our economy and it allows people with disabilities or injuries to still enjoy the park. I found it interesting that the groups that are pushing for the regulations are made up of people that don't live here and that rarely visit Mt. Rushmore. I have been to Mt. Rushmore numerous times, driving out in the hills and around the park. I have never noticed any noise or environmental damage being done by the helicopter tours. In fact, the only time I have seen one is when I drive by their landing pad. You are creating a regulation to fix a non-existent problem.

Correspondence ID: 38Project:97377Document:128168
Name: Johnson, Lisa C
Received: May,18 2023 16:27:44
Correspondence Type: Web Form
Correspondence: Leave things alone. It's worked for 30 years. Why do people feel the need to "fix" things that aren't broken.

Correspondence ID: 39Project:97377Document:128168
Name: Lindsay, Michael P
Received: May,19 2023 02:45:35
Correspondence Type: Web Form
Correspondence: They are a great addition to the community.

Correspondence ID: 40Project:97377Document:128168
Name: Whetham, Cheryl R
Received: May,19 2023 09:19:19
Correspondence Type: Web Form
Correspondence: I'm pleased to see that the NPS noticed a problem with the number of air tours within Mount Rushmore National Memorial and the surrounding area. There are also problems with air tours over Black Elk Wilderness, Crazy Horse and Custer State Park. Basically, the entire Black Hills is negatively impacted by these tours. I'm a local outdoor enthusiast and author of "Hiking Centennial Trail". Over the past few years, my outdoor experience has been degraded by the number of air tours and the constant noise while trying to enjoy nature and solitude - remoteness from sights and sounds. I think the proposed amendment to restrict all commercial air tours within ATMP boundary is the only solution to protect the natural and cultural resources, wilderness character, visitor experience, and tribal lands.

The plan should consider even expanding the restricted area. The enjoyment for all residents and visitors in the Black Hills, not just Mount Rushmore National Memorial, is impacted by the noise of these commercial air tours. While I can seek a quieter time to hike Black Elk Wilderness, the July 4th tourist is trapped. They can't possibly enjoy a hike within Black Elk Wilderness or the area surrounding Crazy Horse with constant noise interruptions. Although this can have a negative impact on these businesses, the desire for profit does not exceed an individual's right to enjoy the peace and solitude of nature in the Black Hills. Residents also have rights. In fact, don't we own the land?

Thank you for tackling this issue. Please do what's best for the land, air quality, wildlife and cultural resources.

Respectfully,
Cheryl Whetham

Correspondence ID: 41Project:97377Document:128168
Name: Huhtiniemi, Jukka R
Received: May,19 2023 09:25:52
Correspondence Type: Web Form
Correspondence: I am pleased with the proposed amendment to restrict all commercial air tours within ATMP boundary.

Thank you,

Jukka Huhtiniemi

Correspondence ID: 42Project:97377Document:128168
Name: ,
Received: May,20 2023 17:23:34

Correspondence Type:

Web Form

Correspondence: I am NOT a supporter of the aviation tours that closely fly next to Mount Rushmore National Memorial. I'm an advocate for keeping the Black Hills National Forest as pure as humanely possible with the least amount of negative influence from humans. Being an avid hunter and fisherman, it's not ideal when you are trying to get away from civilization to enjoy some peace and quiet and all you can hear is helicopters and loud planes. It's not good for any of the animals that reside in the Black Hills. We already deal with the Sturgis motorcycle rally so it's already loud on ground level from motorcycles. We don't need to add to it with air nuisance.

For some citizens of Keystone (including my own), the flight path fly's directly over my residence WITHIN the boundary of Mount Rushmore National Memorial. My house constantly shakes from helicopters, and it makes it extremely annoying when working overnight shifts which require you to sleep during the daytime hours. Normal daily traffic does not cause an inconvenience, however air traffic that shakes my house affects daily life during the summer.

In conclusion, I think that the Black Hills should remain as quiet as possible. I care not only about the wildlife that aviation causes alarm to, but also about the people who reside in the Hills and that are specifically tasked with protecting and preserving this area.

Correspondence ID:

43Project:97377Document:128168

Name:

Meiris, Jessica

Received:

May,23 2023 13:06:55

Correspondence Type:

Web Form

Correspondence: Thank you for your time in reviewing these comments. As a professional helicopter pilot and small business operator, the management of helicopter operations is an important subject about which I feel strongly.

The ATMP process was neglected by the FAA after the creation of the Grand Canyon ATMP. Since that time, parks that were required to have agreements in place were largely ignored, with a few operators developing voluntary agreements with a few park units resulting in successful collaboration that supported the needs of the park unit with the economic viability of the operators.

The court case that is at the root of this hurried process to complete the ATMP process ordered the FAA to complete ATMP OR Voluntary Agreements with operators at 23 park units that qualified within two years. The court order does NOT mandate reductions, and certainly in no way suggests or supports elimination.

The proposed elimination is purely at the whim of the NPS and has not been sufficiently studied or justified, regardless of the claims made by the NPS in their own internally produced documents. In fact, many of the statements made are pure fantasy that collides with the realities on the ground. Voluntary Agreements ARE allowed, and in fact one of the parks which required the ATMP process to be completed was done with a Voluntary Agreement.

With respect to the voluntary agreement process, there were terms for a Voluntary Agreement worked out between the NPS and our companies. This process was just about over the finish line when the NPS came in and shut it all down, backing away from the agreement.

The NPS, empowered by the inaction of the FAA is moving forward in bad faith. This has become a process of winners and losers, instead of the win for both park units and the local communities that surround them.

Secondly, the plan as proposed would create enormous safety issues by the deliberate compression of air traffic into a smaller corridor. By pushing the current routes flown by our company outside of the 1/2 mile buffer of the park boundary the corridor in which

people will be flying is now compressed and combined with other air traffic. This represents a significant elevation of risk and community impact. There is virtually no difference in sound impact based on where the current routes run. The separation provided by the current route structure eliminates traffic conflicts.

Safety is the number one mandate of the FAA. According to their website, "Safety is our North Star". Other priorities listed by the FAA include Sustainability and Equity and Job Creation. It doesn't take much reading to determine that every single one of these priorities are being ignored in the ATMP process. To the contrary, elevated risks, elimination, discrimination, and the removal of important workforce development entities have become the goal. The impacts to safety cannot be underestimated.

Lastly, the economic impact to the local communities would represent \$45,000,000 over the next ten years. Almost every penny of that revenue is returned to the local community through the operation of the business with local vendors. From an environmental standpoint, aerial tourism represents the lowest impact of all types of park visitation. The sound produced is minimized by altitude and position and dissipates quickly. We leave no trace behind, and do not require park staff or vehicles to support our form of visitation, making the \$45,000,000 even more broad reaching.

Most concerns that the NPS cites in its documentation ignores all other forms of sound created by modes of transportation other than those utilized by aerial tourism. Additionally, there is no separation of other forms of aviation, heavy motorcycle traffic, side by side traffic, park service vehicle traffic and human visitor traffic. Certain groups are given unsubstantiated weight and involvement in the process. This discriminatory and unscientific approach shines a spotlight on this flawed process. Aerial tourism provides individuals with mobility challenges, the very young, and older segments of the population equal opportunity to enjoy our public lands and natural spaces. Removing the ability for these folks to enjoy the same views as everyone else represents a highly discriminatory process. Regardless of ability, the freedom to choose how to visit our public spaces should have choices to fit all. These views and experiences must be accessible to everyone.

Please, follow process as required by NPATMA to protect commerce, support our local communities, and ensure safety.

Thanks,

Jessica Meiris

Correspondence ID:	44Project:97377Document:128168
Name:	Allen, Alice
Received:	May,24 2023 14:31:00
Correspondence Type:	Web Form
Correspondence:	Dear Superintendent,

Black Hills Back Country Horsemen fully supports the proposed plan to eliminate air tours above Mt. Rushmore National Memorial. The current level and frequency of noise from helicopters is not conducive to enjoying the sense of place that is Mt. Rushmore. Nor is it complementary to the solitude offered by the adjacent Black Elk Wilderness. The proposal will improve safety and enjoyment for equestrians visiting the Memorial via the Blackberry Trail.

Thank you for tackling this issue and coming to an appropriate proposal.

Alice Allen, President
Black Hills Back Country Horsemen of South Dakota

Correspondence ID:	45Project:97377Document:128168
Name:	Cleveland, Kathryn
Received:	May,25 2023 21:14:57
Correspondence Type:	Web Form

Correspondence: I received an email with information and this link for the helicopter flight study. I'm glad someone is doing something to track and regulate the air traffic around the monument. I looked up and found three businesses who promised exclusive flights in the Black Hills or specifically around Mt Rushmore. I live outside Hill City and hike regularly in the Hills. I also take visitors to both Mt Rushmore and Crazy Horse.

The helicopters are intrusive, noisy and distracting to the enjoyment of the Hills and the respect owed to the monument. These flights are a luxury that few can afford and only a few benefit from.

My husband was a career Marine and flew USMC Copra helicopters before his retirement. I am concerned with the number of flights that take place in our short tourist season. . It's only a matter of time before the congestion in the skies results in to a tragic accident. Everyone knows helicopters don't glide and a midair crash ends in death. There is no reason to have flights

closer than the proposed half mile limit. I personally think the number of helicopters in the air should be monitored or limited. Lack of oversight is a lawsuit waiting to happen.

Thank you for investigating this. I support any and all limits to helicopter flights around Mt Rushmore.

Sincerely, Kathryn Cleveland

Correspondence ID: 46Project:97377Document:128168
Name: Farrand, Mark
Received: May,26 2023 07:51:57
Correspondence Type: Web Form
Correspondence: I am entirely IN FAVOR of this proposal to prohibit flyovers as stated in this document over the Mount Rushmore area. I personally have nothing against small businesses that are tourism based and I currently work for one in Keystone. My biggest concern with the helicopters flying to and from Keystone is the noise. There are fewer and fewer places to find solitude in our Black Hills, and the overflights have made this much worse. Thank you for your efforts in this matter.

Correspondence ID: 47Project:97377Document:128168
Name: Plastow, Robert
Received: May,26 2023 14:52:07
Correspondence Type: Web Form
Correspondence: I am a private pilot and outdoor enthusiast. Please DO NOT make Mt. Rushmore a no fly zone.

Correspondence ID: 48Project:97377Document:128168
Name: Lee, Robert E
Received: May,26 2023 16:38:16
Correspondence Type: Web Form
Correspondence: Don't do this. Tough to enforce... most people cannot tell 1000 ft AGL from 5000ft Agl. There will be complaints constantly even when people are following the rules. Also there will be a constant stream of complaints against aircraft's that are not commercial operations . This has nothing to do with safety, and everything to do with preferences. Some prefer that people don't fly over, some prefer to fly over... where would something like this stop. Why stop at 5000 ft agl why stop at 1/2 mile from park boundaries. I see this as the first step in what would be a perpetual creep of people never being satisfied with the actions of others. Thank you

Correspondence ID: 49Project:97377Document:128168
Name: Scherr, Jayme
Received: May,26 2023 17:16:01
Correspondence Type: Web Form
Correspondence: I am a private pilot that grew up in Rapid City most of my life. One of the first requests that friends and family have when they come to visit is a flight over the black hills and MT Rushmore. The current rules and regulations make this a very safe and enjoyable experience for many people visiting our area every year. To take this privilege away would be terrible. The economic impact as well for the area especially local tour companies would be devastating. This is unnecessary and not needed. Thank you for your attention to this matter, Dr. Scherr.

Correspondence ID: 50Project:97377Document:128168
Name: ,
Received: May,26 2023 17:40:51
Correspondence Type: Web Form
Correspondence: This letter is written in support of your proposal to eliminate aerial tours from Mount Rushmore. I have read through the ATMP and agree that the impact of the helicopter tours are deleterious to wildlife, to tribal concerns, to the enjoyment of the monument, and to the quality of life for those of us who reside in Keystone. It wasn't too many years ago that a citizenship ceremony had to be suspended at the monument due to the fact that the speaker could not be heard on the

microphone over the noise generated by the helicopters. I used to enjoy spending my summers with my family in Keystone but that is no longer possible due to the noise pollution that is present from early in the morning until late into the evening. We used to enjoy abundant wildlife including many different species of birds. Currently the birds are practically nonexistent and I have assumed that this was due to the obnoxious and intrusive noise caused by the helicopters. There was no way that I could prove that but your statement about what happened to the peregrine falcon would certainly support my thesis.

This issue has come up in the past and the owners of the helicopter businesses were always able to avoid taking responsibility for the damage that they do. They would bring the quietest helicopter that they own to a demonstration instead of flying three at one time which is frequently the case. They also claimed that the helicopters were no more noisy than the motorcycles which predominate during the Sturgis rally. They do not point out that the acoustic mitigation of the surrounding forest keeps the motorcycle noise to a minimum. I have never found that to be intrusive when at my home during the summer. Therefore, if they wish to keep their helicopters on the ground they can run them as much as they want. However if they want to fly them, they should not compare them to motorcycles because this is definitely not an apples to apples comparison.

I would like to thank you for your willingness to proceed with your proposal. This will be a tremendous improvement in the Mount Rushmore and surrounding park experience. When visiting Yosemite, I have often thought how nice it is to not have to deal with helicopters flying up and down the valley. The thought of helicopters buzzing by El Capitan is incomprehensible. It should be equally offensive to visitors at our country's most iconic monument.

Correspondence ID: 51Project:97377Document:128168

Name: Winter, Jack

Received: May,26 2023 19:26:00

Correspondence Type: Web Form

Correspondence: As I read this draft, it appears there is a drive to eliminate "unnatural sounds" and so they want to shut down commercial operations of people who want to see Mt. Rushmore from the air. It seems to me the next group to "shut down" would be private pilots in their aircraft (there is already rules in place to keep all aircraft above 7700 ft msl vertically and 2500 ft horizontally from the monument).

If the only reason to shut down aircraft flying near Mt. Rushmore is due to unnatural sounds, then I would propose placement of the same restrictions upon all vehicles... Motorcycles, automobiles, trucks, campers ... and see what opposition comes from this move.

I believe the existing rules are enough limitations on traffic viewing Mt. Rushmore.

Thank you
Jack Winter
605-350-4988

Correspondence ID: 52Project:97377Document:128168

Name: S, Shane

Received: May,26 2023 21:14:34

Correspondence Type: Web Form

Correspondence: Hello

I am writing to say that I am against canceling the helicopter tours of Mt Rushmore.

We go to Keystone every year to see Mt Rushmore. We also take a helicopter trip over Mt Rushmore every trip.

Seeing Mt Rushmore, or any national monument, when you are able to experience it from a helicopter is absolutely amazing. Plus, to see the Black Hills as part of this helicopter trip is such an amazing experience.

The helicopters are not annoying or creating any sort of issues. It's part of the wonderful tourist atmosphere that lives in Keystone.

Don't take away such an amazing, breathtaking experience for families from our United States and even the world. It is a wonderful tradition that I want to continue with my family..

Thank you

Correspondence ID: 53Project:97377Document:128168
Name: Schuur, Ryan
Received: May,29 2023 17:09:39
Correspondence Type: Web Form
Correspondence: I strongly encourage no change to airspace surrounding mount Rushmore, it's a great privelege to be able to see the monument by air and to share that with passengers.

Correspondence ID: 54Project:97377Document:128168
Name: Martens, Brenda
Received: May,29 2023 19:27:30
Correspondence Type: Web Form
Correspondence: Whats the reason???? I hope you don't claim security, because that is not a reason, another PARK SERVICE grab of airspace,or are all the tree huggers pushing for it???. Are the load mouth minority at it again?? Forget it.

Correspondence ID: 55Project:97377Document:128168
Name: Tester, John
Received: May,31 2023 04:44:39
Correspondence Type: Web Form
Correspondence: body content

Correspondence ID: 56Project:97377Document:128168
Name: ,
Received: May,31 2023 12:08:58
Correspondence Type: Web Form
Correspondence: This proposal unnecessarily restricts public access to airspace near Mount Rushmore. The current restrictions are reasonable and balance the public interest for enjoyment of this important national resource from the ground as well as the air.

The proposed changes fail to consider the public interest by removing the option for many people to have once-in-a-lifetime public views via general aviation of this public monument.

Correspondence ID: 57Project:97377Document:128168
Name: Newton, Christian
Received: Jun,05 2023 11:28:36
Correspondence Type: Web Form
Correspondence: Mount Rushmore was dedicated to all peoples of the United States. President Calvin Coolidge's dedication address states, "The Union of these four presidents carved on the face of the everlasting hills of south dakota will constitute a distinctly national monument. It will be decidedly American in its conception, in its magnitude, in its meaning, and altogether worthy of our country." Notably, these words are also inscribed on a plaque at the site of Mount Rushmore. Mount Rushmore is a national monument for all the people of the US. That includes the customers of air tour operators, too. To deny those customers this particularly special view would not be in keeping with the purpose of a national monument.

The noise standard for commercial air operations is 65 DNEL. The proposed 52 dB is not a standard nor should it be. Any

restrictions should be redrawn with the 65 DNEL.

The data used to determine the noise impact is specious and vague. The tour helicopters are equipped with ADS-B transponders and it would be a simple exercise to place a receiver near the Mt. Rushmore mall to obtain actual tour operator flight tracks and altitudes. It would also seem prudent to place a noise sensor to measure actual noise. This data could then be used to accomplish a proper analysis of noise impact and complete the necessary environmental assessment as required by NEPA.

Correspondence ID: 58Project:97377Document:128168
Name: Halter-Waider, Carol
Received: Jun,05 2023 17:38:19
Correspondence Type: Web Form
Correspondence: I am in favor of better regulating the use of air space around Mt. Rushmore and the rest of the black hills. The noise produced by the helicopters all over the hills ruins the experience when trying to be in the wilderness. Having these tours at the frequency they currently have seems unnecessary. I have visited numerous National Parks, and South Dakota is the ONLY place allowing these obnoxious helicopters.

Correspondence ID: 59Project:97377Document:128168
Name: Kriz, Mike
Received: Jun,05 2023 17:39:00
Correspondence Type: Web Form
Correspondence: I strongly support the continued operation of helicopter tours over mt rushmore. Helicopter tours are the most environmentally sound inputs to the national forward mt rushmore and shall be continued. NPS should be more concerned about government funding and not intrusion in private enterprise

Correspondence ID: 60Project:97377Document:128168
Name: Kruckenberg, Mary
Received: Jun,05 2023 17:56:59
Correspondence Type: Web Form
Correspondence: Will anything be done to control the noise destruction of the helicopter flights over the black elk wilderness? Or horse thief lake?

Correspondence ID: 61Project:97377Document:128168
Name: Oetker, Lois
Received: Jun,06 2023 06:29:53
Correspondence Type: Web Form
Correspondence: The noise pollution caused by the low flying helicopters 🚁 is not pleasant when staying at Camp Remington. This is a church owned private property that is near the Black Elk hiking area. I go to Camp Remington about 3 times every year for "peace and quiet" and hear loud helicopter tours overhead which are annoying, imho.

Correspondence ID: 62Project:97377Document:128168
Name: ,
Received: Jun,06 2023 10:25:11
Correspondence Type: Web Form
Correspondence: No more helicopters in the black hills !! it's a noise nusiance that takes away from the experience and impacts the wildlife!

Correspondence ID: 63Project:97377Document:128168
Name: O'Gara, Hugh
Received: Jun,07 2023 13:42:28
Correspondence Type: Web Form

Correspondence: Viewing Mount Rushmore should be a reflective time, unmarred by eggbeater tours that simply make money for any individual. As for arguments an airborne tour allows physically challenged individuals to enjoy the Four Faces ignores the fact the NPS upgrades the facility to allow just that. Keep them out of the NPS airspace.

Correspondence ID: 64Project:97377Document:128168

Name: Rodriguez, Michael

Received: Jun,07 2023 15:40:15

Correspondence Type: Web Form

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

I strenuously oppose the draft ATMP for Mount Rushmore National Memorial. I disagree with the elimination of Interim Operating Authority (IOA) and believe that the National Park Service (NPS) and the Federal Aviation Administration (FAA) failed to complete due diligence to determine the true impacts to the operators, the public, and the Memorials resources in the ATMP process.

According to the NPS documents, on average, from 2017-2019, 3,914 commercial air tours occurred over Mount Rushmore National Memorial Park every year. Under this draft ATMP, commercial air tours will be prohibited within the ATMP boundary of Mount Rushmore National Memorial Park.

The FAA and the NPS failed to reach out to the operators to determine the economic impacts from implementing a radical management plan that so severely restricts overflights. This plan will take \$45 million out of the local economy over 10 years and destroy local institutions that have been in operation since the 1960s.

As the NPS and the FAA have released the Draft Air Tour Management Plan (ATMP) it is very clear that the agencies have an agenda to eliminate the air tour industry. The real harm is not only to the air tour operators, but also to the National Memorial visitors. The ATMP is discriminatory against visitors who choose to experience the National Memorial by aerial sightseeing.

As we move past the pandemic years, many national parks and memorials saw their resources strained by the large number of visitors as the public began to travel again. Air tours are an important option for many visitors conducting a one-in-a-lifetime trip to see famous natural landmarks. Visitors taking advantage of air tours benefit by avoiding traffic, wait times, and walking trails that are inaccessible for the handicapped or elderly, while reducing congestion and demand on park infrastructure. Helicopters represent the single lowest impact form of visitation to our parks. Helicopters reduce traffic congestion, emissions, sound and all ground-based impacts. Nothing is taken from the park except for memories.

The national parks and memorials should be available for all visitors to see. Limiting flights over Mount Rushmore unfairly limits the elderly, very young, disabled, and others to experience the Memorial. Limiting flights over Mount Rushmore is discriminating to those who might not have the time, resources, or physical ability to see the memorial any other way.

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

By further restricting an already limited number of allowable air tours, we are reducing opportunities to access our parks and memorials in a way that leaves little to no environmental footprint or disturbance. Through carbon-offset efforts and strict altitude requirements to control noise just to name a few efforts air tour operators are working to ensure they are responsible stewards of the nations parks and memorials. There are currently no restrictions or mitigation efforts for loud vehicles operating in Mount Rushmore, some of which make more noise than a passing helicopter.

Undoubtedly it is essential to preserve the National Parks and Memorials, yet still enable all forms of visitation so that all may enjoy. While I oppose the draft ATMP, commercial air tour operators would welcome collaborative engagement with the FAA, NPS, and all interested parties to benefit the memorial and the visitors.

Correspondence ID: 65Project:97377Document:128168

Name: mcpherson, gene w

Received: Jun,07 2023 16:11:50

Correspondence Type: Web Form

Correspondence: I am a back-country hiker and camper for the last few decades. I have hiked extensively in Glacier, and at other National Parks. In the backcountry, peace is one of the wonderful attributes of such places. So when I hear overhead aircraft which always disturb the peace I remind myself that the NPS, in its zeal to provide everything to everyone, does not understand that just because someone CAN fly around above a National Park, that does NOT mean that someone SHOULD. There is no law that I know of that states that all opportunities must be provided to all who request. And in National Parks, particularly, I know of no law that states that the Park Service must provide all possible accommodations of all types to all. I oppose ALL Park overflights except for emergencies. But the camel's nose is obviously under the tent, so we must accommodate what has already happened. But I oppose any further advancement of any overflight permission, and would be happy if the present permission were reduced or circumscribed, with the future hope that, eventually, no overflights at all, except emergencies, would be permitted.

NPS has banned motorboats from some Glacier Park lakes. It has made other prohibitions in various Parks, but I cannot remember them. I believe that the way is clear for NPS to continually restrict and eventually ban all overflights in Parks, with the above exception.

What's more important here: Preserving the peace in our National Parks? Or providing all possible visitor experiences to all possible visitors at all times? If it is the latter, then NPS should allow motorboats on all lakes in all National Parks.

Correspondence ID: 66Project:97377Document:128168

Name: Massing, David

Received: Jun,07 2023 17:04:22

Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with Kia and if you limit the access then kids like me will miss out on one of the best times of there lives so plz don't limit the access of.

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 67Project:97377Document:128168

Name: Massing, Diana

Received: Jun,07 2023 17:12:12

Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with Blue Hawaiian Helicopters and it was sucj an educational experience for our childre. We saw parts of the National Park we never would have been able to see, and our son who just learned Bout volcanoes experienced it up front in such a unique way.

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 68Project:97377Document:128168
Name: Wells, Suzanne D
Received: Jun,07 2023 17:36:48
Correspondence Type: Web Form
Correspondence: This is wrong. Negative impact for Operators. Negative economic impact for Community.

Correspondence ID: 69Project:97377Document:128168
Name: Wells, Jennifer L
Received: Jun,07 2023 18:03:17
Correspondence Type: Web Form
Correspondence: I have great concerns over the significant economic impact and safety concerns that the ATMP will have on the town of Keystone if the flights are removed. This plan has not taken these things into consideration in making the drastic change in its allocations to zero. Also, the claims regarding the impact to endangered species, wildlife, etc., is not based on any expert analysis or opinion. The helicopters do not fly close enough to disrupt the wildlife, and the wildlife is more likely disputed by the people, motorcycles and vehicles going through the park. The town of Keystone and Southern South Dakota need these businesses to help buster and sustain their economy. There also has not been any actual communication with the operators/owners of aerial tour businesses in the area giving them the opportunity to make a case as to why they should still be able to fly over the park. The plan is overreaching and DOES not consider all areas that will be negatively impacted by implementing the plan.

Correspondence ID: 70Project:97377Document:128168
Name: Wells, Donald R
Received: Jun,07 2023 18:08:21
Correspondence Type: Web Form
Correspondence: I have been to Mt Rushmore many times and the Helicopter Flyover have never bothered me one time. Noise Polution from a helicopter flying at the mandated FAA altitude over Mt Rushmore is 53db as stated by NPS. Just louder than a runnling refrigerator and less than an electric toothbrush according to the CDC.
A running motorcycle is 95db. On average over 400 motorcycles tour the park each day between May 1st and Sept 30th. A tour helicopter flying over the Park lasts just over 2 minutes. The motorcycles are there all day and into the night.
If it's "Sacred Land" shouldn't it be given back to the Tribes? Are you closing all the Trails thru the Sacred Land? The Economic Impact to Custer and Keystone plus the Tour Operators will be significant. I believe more independent study of the Economic Impact should be done prior to a final decision. You can't let the Fox count all the chickens in the henhouse. Not to mention the Safety concerns of changing routes which have been flown for decades.

Correspondence ID: 71Project:97377Document:128168
Name: Howard, Gregory
Received: Jun,07 2023 18:47:34
Correspondence Type: Web Form
Correspondence: The overflights in and around Mount Rushmore and the Badlands allow people to see thses majestic places from a vantage point not allowed by any other means. There is no footprint left after any and all overflights. Present day restrictions allow for a safe operating environment and suggested elimination does no further safety margin but literally kills the free market aerial tourism sector for that area.Plese do not implement the proposed flight regulations.

Correspondence ID: 72Project:97377Document:128168
Name: Mann, Brandon
Received: Jun,07 2023 19:43:39
Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 73Project:97377Document:128168
Name: Beimes, Matthew
Received: Jun,08 2023 02:12:54
Correspondence Type: Web Form
Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with Blue Hawaiian Helicopters and it was amazing and the only way to experience the Volcano for most.

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 74Project:97377Document:128168
Name: Cella, Peter
Received: Jun,08 2023 02:24:33
Correspondence Type: Web Form
Correspondence: I would like to express my concerns about the future of seeing Hawaiis National Parks by air.

This is an amazing and non invasive way to see the National Parks in Hawaii. Not only does this decrease foot traffic but it also provides people with a once in a lifetime chance to see Hawaiis hidden beauty.

This does not affect native or endemic plants/wildlife as does people driving into the parks. The NPS are relieved of excess traffic, by way of helicopter tours, and also compensated for it.

I ask that you reconsider limiting these opportunities for the public. These areas are in such high regard and will be enjoyed by so many more when they are able to be seen by air.

Mahalo for taking the time to consider my view. I know there are many others that feel the same. Helicopters are an efficient tool to share the most beautiful and remote parts of the aina here in Hawaii.

Correspondence ID: 75Project:97377Document:128168
Name: Hennessee, Melody
Received: Jun,08 2023 03:51:41
Correspondence Type: Web Form
Correspondence: This will cause a negative impact to the Operators, a negative impact to the community, and negative impact to economics. This is wrong.

Correspondence ID: 76Project:97377Document:128168
Name: Enoch-Kroger, Janice
Received: Jun,08 2023 06:54:49
Correspondence Type: Web Form
Correspondence: Any curtailment of tour opportunities will cause a negative impact to the Operators, a negative impact to the community, and negative impact to economics also negatively impact visitors to the park.This is wrong and unnecessary.

Correspondence ID: 77Project:97377Document:128168
Name: Hlavac, Bennett
Received: Jun,08 2023 06:55:04
Correspondence Type: Web Form
Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I strenuously oppose the draft ATMP for Mount Rushmore National Memorial. I disagree with the elimination of Interim Operating Authority (IOA) and believe that the National Park Service (NPS) and the Federal Aviation Administration (FAA) failed to complete due diligence to determine the true impacts to the operators, the public, and the Memorials resources in the ATMP process.

According to the NPS documents, on average, from 2017-2019, 3,914 commercial air tours occurred over Mount Rushmore National Memorial Park every year. Under this draft ATMP, commercial air tours will be prohibited within the ATMP boundary of Mount Rushmore National Memorial Park.

The FAA and the NPS failed to reach out to the operators to determine the economic impacts from implementing a radical management plan that so severely restricts overflights. This plan will take \$45 million out of the local economy over 10 years and destroy local institutions that have been in operation since the 1960s.

As the NPS and the FAA have released the Draft Air Tour Management Plan (ATMP) it is very clear that the agencies have an agenda to eliminate the air tour industry. The real harm is not only to the air tour operators, but also to the National Memorial visitors. The ATMP is discriminatory against visitors who choose to experience the National Memorial by aerial sightseeing.

As we move past the pandemic years, many national parks and memorials saw their resources strained by the large number of visitors as the public began to travel again. Air tours are an important option for many visitors conducting a one-in-a-lifetime trip to see famous natural landmarks. Visitors taking advantage of air tours benefit by avoiding traffic, wait times, and walking trails that are inaccessible for the handicapped or elderly, while reducing congestion and demand on park infrastructure. Helicopters represent the single lowest impact form of visitation to our parks. Helicopters reduce traffic congestion, emissions, sound and all ground-based impacts. Nothing is taken from the park except for memories.

The national parks and memorials should be available for all visitors to see. Limiting flights over Mount Rushmore unfairly limits the elderly, very young, disabled, and others to experience the Memorial. Limiting flights over Mount Rushmore is discriminating to those who might not have the time, resources, or physical ability to see the memorial any other way.

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

By further restricting an already limited number of allowable air tours, we are reducing opportunities to access our parks and memorials in a way that leaves little to no environmental footprint or disturbance. Through carbon-offset efforts and strict altitude requirements to control noise just to name a few efforts air tour operators are working to ensure they are responsible stewards of the nations parks and memorials. There are currently no restrictions or mitigation efforts for loud vehicles operating in Mount Rushmore, some of which make more noise than a passing helicopter.

Undoubtedly it is essential to preserve the National Parks and Memorials, yet still enable all forms of visitation so that all may enjoy. While I oppose the draft ATMP, commercial air tour operators would welcome collaborative engagement with the FAA, NPS, and all interested parties to benefit the memorial and the visitors.

Correspondence ID: 78Project:97377Document:128168

Name: , Brent

Received: Jun,08 2023 08:23:58

Correspondence Type: Web Form

Correspondence: Helicopter touring companies attract and retain tourism year in and year out. Every summer I look forward to the opportunity of flying and seeing what all SD has to offer and I'm sure many others would agree. It has come to my attention that these tours may be restricted or even stopped which is EXTREMELY disappointing. I hope there is an understanding what the economical impact would for the surrounding small towns. I live in Las Vegas and understand the value and need for a steady flow of traffic for the small business that glue our community together. This would not only effect the touring companies , but also the surrounding small businesses that people stop at before they go to their tours. We the hardships that 2023/2024 are bringing, many small businesses are struggling to even keep their doors open. Why would eliminating a fun and interactive tourism activity such as a helicopter tour (which spikes the interest of the majority of the population that visits) and have the flow of people come to a stop? I don't make sense to me and it truly is saddening that our hard working businesses are going to lose something they have worked so hard to establish. The helicopter noise is not a disturbance either. I NEVER notice it when I am in the area. Only when I am at the facility is when I notice them taking of and landing.

Correspondence ID: 79Project:97377Document:128168

Name: Reents, John

Received: Jun,08 2023 08:48:30

Correspondence Type: Web Form

Correspondence: I agree with the nps proposal to terminate these tour flights.
Each one of these flights degrades the experience of other park users.
Please continue to protect the parks and sacred places we love.

Correspondence ID: 80Project:97377Document:128168

Name: Lorimor, Candace

Received: Jun,08 2023 11:40:19

Correspondence Type: Web Form

Correspondence: I feel the need to ask that this policy not go into affect. I understand that National Parks need to be protected, but I believe this is going to extremes. I believe only one side of this issue is being considered. I know for a fact that tourist love to be able to see our national monuments from the air and close up. They pay good money for this experience. I feel this policy will affect the well fare of business owners. Not only the tour business owner but the business owners of Keystone. The air tours bring people to our town for the experience and they also eat, shop and spend the night in our town, bringing tax dollars to the town. These air tours of Mount Rushmore have existed my entire life of 55 years and before. I have a hard time believing that all of a sudden they are a danger to wildlife. I don't believe the whole pictures has been looked at and all sides considered. I am a self proclaimed tree hugger, but with common sense. We have to look at all the sides and find a common ground, not just the extreme in one direction. I love wildlife and know we need to protect it. I can only imagine how much of it was damaged and destroyed in the carving of Mount Rushmore. That being said I also love the Town of Keystone, the people and tourist industry. We need to protect all of it. Please consider these comments from a person who's family has lived in the Keystone/Mount Rushmore area for over 85 years. We need all these things to survive for our next generations, including the helicopter tours.
Thank you

Correspondence ID: 81Project:97377Document:128168

Name: Samaniego, Charissa

Received: Jun,08 2023 11:56:34

Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii, Mount Rushmore National Memorial, and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with David and it was an amazing way to see the Grand Canyon.

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 82Project:97377Document:128168
Name: Thompson, Michael
Received: Jun,08 2023 12:11:12
Correspondence Type: Web Form
Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.
Mahalo mike

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with [Name of Operator] and it was [please provide your experience and why you shouldnt be restricted from the experience].

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

With all that being said Ive seen the aina from the air and its beyond explanation the beauty and spirituality it holds. I believe and its unfortunate that every Kamaaina should see the aina from a lower than commercial airliner. And that goes for all national parks
Mahalo

Correspondence ID: 83Project:97377Document:128168
Name: Hedge, Monica
Received: Jun,08 2023 12:56:22
Correspondence Type: Web Form
Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with Blue Hawaiian Helicopters and it was wonderful. I am part Hawaiian, born and raised on Maui. It was such a joy to be able to see all the different Hawaiian islands from the air, a perspective not very many locals get to see. I got to see the destruction from the lava years ago on Hawaii Island, with one house spared and patches of greenery among the black. It was enlightening.

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 84Project:97377Document:128168

Name: Kimura, Wayson

Received: Jun,08 2023 12:57:36

Correspondence Type: Web Form

Correspondence: I am writing in regards in keeping our national parks open. The best ways we can show the natural beauty of the islands is honestly to let the public have access within reason. Working in the travel industry it's a vital asset to the community to be respectful and mindful of the natural beauty of the islands. One of the ways to do this is to be able to have the opportunity to share it with others and give the ability to share it's beauty.

Please keep the parks open and so that way we may have the opportunity to share the majestic views of what makes Hawaii, Hawaii. Thank you so much for your time.

Correspondence ID: 85Project:97377Document:128168

Name: Leaxh, Kimberly

Received: Jun,08 2023 13:08:41

Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with [Name of Operator] and it was [please provide your experience and why you shouldnt be restricted from the experience].

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Thank you for the opportunity to respond to this issue.

Correspondence ID: 86Project:97377Document:128168

Name: Radford, Tricia

Received: Jun,08 2023 13:11:59

Correspondence Type: Web Form

Correspondence: I really feel it is important to keep this type of entertainment and experience available to all!!!!

I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with [Name of Operator] and it was [please provide your experience and why you shouldnt be restricted from the experience].

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 87Project:97377Document:128168

Name: Leach, TJ
Received: Jun,08 2023 13:13:13
Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with [Name of Operator] and it was [please provide your experience and why you shouldnt be restricted from the experience].

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Thank you
TJ leach

Correspondence ID: 88Project:97377Document:128168

Name: Yadao, Lorely
Received: Jun,08 2023 13:27:57
Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with Blue Hawaiian Helicopters and it was very eye opening regarding the Hawaii islands and it's something I think everyone should take at least once, it was a very entertaining yet educational experience.

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 89Project:97377Document:128168

Name: Camacho, William
Received: Jun,08 2023 13:35:26
Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with Mike Guelda who flies for Blue Hawaiian Helicopters, and it was illuminating to say the least. I was informed of the necessity of the safety of the Aina(land) and all its magnificence. This was beautiful and eye opening (as well as my mouth most of the time) to see how this land is, was, and forever will be a testimony that we are just here for a time and that we should learn from the awesome facets of our Islands as well as the entire world should be taken into the most deepest parts of our hearts, minds, and body (as possible). And these helicopter

tours are part of the experience and exposure to appreciate our earth, not just the national parks but most definitely including those as well, especially since I have a medical condition which prevents me from walking more than 100 yards, elevations and incline/grades of walking would not be wise for me. For example, drones could record the flight, but they cannot give the energy and essence of the person's heart and the land connecting to each other in a way no machine will ever do! I have seen the professional and most of all respectful attitude and focus of this pilot who I would believe is the same for all their pilots, mechanics, operations, sales personnel have. As well as the jobs that these people have and their families that are supported by giving an adventure that can change a person to see that humility and respect for Our earth is first and foremost and how that is strengthened is not just by reading or seeing videos but by being in that place, in the moment, and with the right perspective.

The National Parks should be available for all visitors to see. I ask that you do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 90Project:97377Document:128168
Name: Camara, Wenona
Received: Jun,08 2023 13:44:56
Correspondence Type: Web Form
Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with [Blue Hawaiian Helicopters] and it was [breathtaking and exhilarating flying over Kilauea erupting at Volcano National Park on Hawaii].

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 91Project:97377Document:128168
Name: Andrews, Forrest
Received: Jun,08 2023 13:48:59
Correspondence Type: Web Form
Correspondence: Lets think about this prudently before we make rash decisions. Seeing natural beauty from the air can actually be life affecting for many people. I have seen it happen. Options and accommodations are out there that address all concerns. Please dont be rigid.

Correspondence ID: 92Project:97377Document:128168
Name: Barns, Karen
Received: Jun,08 2023 14:01:28
Correspondence Type: Web Form
Correspondence: My name is Karen, and I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with [Name of Operator] and it was [please provide your experience and why you shouldnt be restricted from the experience].

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Sincerely Karen Barns

Correspondence ID: 93Project:97377Document:128168
Name: pastores, kayla
Received: Jun,08 2023 14:05:24
Correspondence Type: Web Form
Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with [Name of Operator] and it was [please provide your experience and why you shouldnt be restricted from the experience].

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 94Project:97377Document:128168
Name: Manuel, Karylle
Received: Jun,08 2023 14:06:28
Correspondence Type: Web Form
Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with [Name of Operator] and it was [please provide your experience and why you shouldnt be restricted from the experience].

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 95Project:97377Document:128168
Name: Fragoso, Denise
Received: Jun,08 2023 14:21:01
Correspondence Type: Web Form
Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with Blue Hawaiian Helicopters and it was amazing. What a blessing to be

able to see such beauty from a different perspective. I will never forget such a wonderful experience. Things that you can not see by land.

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks. The parks should be accessible to everyone by both land and air.

Correspondence ID: 96Project:97377Document:128168
Name: Ernandes, Marco
Received: Jun,08 2023 14:31:38
Correspondence Type: Web Form
Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 97Project:97377Document:128168
Name: Smucker, Spencer
Received: Jun,08 2023 15:04:49
Correspondence Type: Web Form
Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with [Name of Operator] and it was [please provide your experience and why you shouldnt be restricted from the experience].

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 98Project:97377Document:128168
Name: Lacey, Eloise
Received: Jun,08 2023 15:15:27
Correspondence Type: Web Form
Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with [Name of Operator] and it was [please provide your experience and why you shouldnt be restricted from the experience].

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 99Project:97377Document:128168
Name: van Beelen, Crystal
Received: Jun,08 2023 15:18:47
Correspondence Type: Web Form
Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I have known many kupuna (elders) to have had the opportunity to experience an air tour with Blue Hawaiian and / or with other air operators and it was something they will never forget. Not everyone is in the position to hike or even walk so having this option is critical.

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 100Project:97377Document:128168
Name: Daligdig, Barrett
Received: Jun,08 2023 16:10:28
Correspondence Type: Web Form
Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with Blue Hawaiian Helicopters and it was life changing.

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 101Project:97377Document:128168
Name: N, Kayla
Received: Jun,08 2023 16:19:49
Correspondence Type: Web Form
Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with Blue Hawaiian Helicopters and it was amazing to see the beauty of the islands from an aerial point of view. A lot of the views included in the tour were places that you can only hike (off trails) to. This helicopter tour allowed us to view these sites without damaging the land by hiking or creating hiking trails on these sacred Hawaiian lands. This means we can see these places safely. These tours also allow us to see all of these beautiful areas

of the islands in just a short 45 minutes. I loved seeing these aerial views because you can see the land in a different perspective. I've lived in Hawai'i my entire life and never saw the island and its miraculous views from that perspective. It helped me to find a newfound love and admiration for these sites that I drive by every day on my way to work. I love this land and care deeply for its beauty to be shown to all that are able to see it.

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 102Project:97377Document:128168
Name: Aviles, Myriam
Received: Jun,08 2023 16:21:49
Correspondence Type: Web Form
Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with [Blue Hawaiian Helicopters and it was an amazing flight.

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 103Project:97377Document:128168
Name: Syverson, Jesse
Received: Jun,08 2023 16:24:26
Correspondence Type: Web Form
Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with Blue Hawaiian Helicopters and it was one of the most breathtaking experiences to see the natural beauty from the air while also being minimally intrusive. I worry when we start limit our ability to experience these parks that we as a nation will lose our connection to nature and our love/desire to preserve it.

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 104Project:97377Document:128168
Name: dancsec, Stephen
Received: Jun,08 2023 16:52:07
Correspondence Type: Web Form
Correspondence: I am writing to raise concernss about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with [Name of Operator] and it was [please provide your experience and why you shouldnt be restricted from the experience].

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 105Project:97377Document:128168
Name: Romo, Denise
Received: Jun,08 2023 17:10:57
Correspondence Type: Web Form
Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with Blue Hawaiiin and it was a wonderful experience. I would not have been able to see all of the sights in my limited time in Hawaii that we saw from the helicopter. We were so high up, I cannot imagine noise being a factor in the enjoyment of the national parks for people on the ground.

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 106Project:97377Document:128168
Name: Asuncion, Frances
Received: Jun,08 2023 17:24:31
Correspondence Type: Web Form
Correspondence: I am writing to raise concern about limiting flights over National Parks in Hawaii. As a resident of Hawaii, in the spirit of sharing our Aloha, a visit to Haleakala and Hawaii Volcanoes are often a highlight to visiting friends and relatives. It is a reminder to All of us of the majestic wonders of the Aina. The availability of flying overhead is once in a lifetime experience and should not be withheld. The experience can life changing as to the future responsibility one has to take care of the land we live in.
Thank you for your consideration.

Correspondence ID: 107Project:97377Document:128168
Name: Perry, Timothy
Received: Jun,08 2023 18:05:11
Correspondence Type: Web Form
Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I have had the pleasure of flying passengers over our National Forests and National Parks for nearly four decades. Everyone has been enthralled by the beauty of their scenic resources that they pay tax dollars to preserve. I have hiked the areas we fly over and I know personally that a visit to the National Parks by air is a minute fraction of the impact of boots on the ground and tires on the road. Its far less intrusive than people who walk off trail or on trails, who use restrooms and all the infrastructure to accommodate them. The visit by air leaves no lasting impact and minimally affects the other visitors

experiences. For many I have flown, they lack the physical fitness or experience to walk the trails or camp. To deny them access is like removing handicap access. It goes against all values of diversity, equity and inclusion to deny anyone access to their natural scenic resources.

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 108Project:97377Document:128168
Name: Keomaka, Jadelyn
Received: Jun,08 2023 19:01:09
Correspondence Type: Web Form
Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with Blue Hawaiian Helicopters and it was amazing and educational to see the island I have grown up on from another angle.

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 109Project:97377Document:128168
Name: West, Jessica
Received: Jun,08 2023 19:59:37
Correspondence Type: Web Form
Correspondence: Please allow helicopter charters to continue over the craters and volcanoes. They are amazing to see and should be viewable by all. I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with [Name of Operator] and it was [please provide your experience and why you shouldnt be restricted from the experience].

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 110Project:97377Document:128168
Name: Buff, Lori
Received: Jun,08 2023 22:05:26
Correspondence Type: Web Form
Correspondence: The economic impact has not been taken into consideration. Strongly advise NPS & FAA include ALL stakeholders in this impact analysis.

Correspondence ID: 111Project:97377Document:128168
Name: Buff, Brandon
Received: Jun,08 2023 22:15:07

Correspondence Type: Web Form

Correspondence: The plan to eliminate all helicopter flights over the park is I'll conceived. The environmental assessment shows noise for worst case. What do those numbers look like averaged out over the year?

Correspondence ID: 112Project:97377Document:128168

Name: Thommes, Phillip

Received: Jun,09 2023

Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with Blue Hawaiian Helicopters and it was a memorable experience for me and my family.

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 113Project:97377Document:128168

Name: Burton, Robert

Received: Jun,09 2023 01:17:16

Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with Blue Hawaiian Helicopters and it was an amazing way to our nations national parks from a perspective that would be impossible to see without the use of helicopters. Without the use of helicopters fellow Americans that do not have the abilities to access our public lands without helicopter travel will never be able to see our beautiful parks if air tourism is eliminated.

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 114Project:97377Document:128168

Name: Uhl, Shane

Received: Jun,09 2023 07:27:09

Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 115Project:97377Document:128168

Name: van Nieuwenhuize, Willem J

Received: Jun,09 2023 10:10:35

Correspondence Type: Web Form

Correspondence: I am veteran (a retired U.S. Army Master Sergeant) and have made it my life's work to protect our freedoms. My wife and I are full time RV'ers and regularly travel to many of our national parks throughout the United States. We visit Mount Rushmore almost every year and have taken part in the ceremony where veterans retire the national colors several times. Freedom to explore national parks is extremely important to us, and we regularly fly over Mount Rushmore and other favorites in the area with a local helicopter tour company - the flights are usually the highlight of our visits.

While well intentioned, I believe the Air Tour Management Plan (ATMP) is an unnecessary government overreach, and an unnecessary curtailment of our constitutionally guaranteed personal freedoms to enjoy Mount Rushmore in the manner of our choosing. I think the ATMP is a government solution searching for a problem, and enjoin you to forego these changes.

Furthermore it is my opinion the ATMP will negatively impact the overall tourist industry in South Dakota, will negatively impact the many small businesses that depend on tourist dollars for their livelihoods, will particularly single out and negatively impact air tour operators, and will negatively impact the many small, rural mountain communities who are already having significant problems providing much needed social programs and assistance.

Please. Leave well enough alone. The ATMP will cause nothing but a great deal of grief for many South Dakotans.

Correspondence ID: 116Project:97377Document:128168

Name: Melton, Ollie

Received: Jun,09 2023 10:26:05

Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 117Project:97377Document:128168

Name: Kaawa, Michelle

Received: Jun,09 2023 13:20:31

Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks. It is our rights as American Citizen's and taxpayers to be able to access these lands in any way we want to.

Correspondence ID: 118Project:97377Document:128168

Name: Schultze, Hudson

Received: Jun,09 2023 14:08:27

Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with [Name of Operator] and it was [please provide your experience and why you shouldnt be restricted from the experience].

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 119Project:97377Document:128168

Name: Guttilla, Monique

Received: Jun,09 2023 14:23:20

Correspondence Type: Web Form

Correspondence: I have visited the park and HELICOPTER NOISE WAS NOT AN ISSUE.

Correspondence ID: 120Project:97377Document:128168

Name: Nitta, Te'a

Received: Jun,09 2023 14:56:57

Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with Blue Hawaiian Helicopters and it was breathtaking to see a view of the lands that we are not able to go on foot. Let alone in a bird's eye view. I fear that without this opportunity to see these restricted places, many tourists will risk the safety of the land and try on foot. This can damage the 'aina and have more trespassing. With this comes more conflict. When they ride in helicopters, there are told of private/ kapu land and that helicopters can be the only way to see it. Most if not all tourists understand better and lay off a bit. Keep our 'aina protected and malama it.

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 121Project:97377Document:128168

Name: SPORRER, STACEY

Received: Jun,09 2023 15:10:52

Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with BLUE HAWAIIAN and it was incredible!

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 122Project:97377Document:128168

Name: Peralta, Shana

Received: Jun,09 2023 15:26:42

Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with Blue Hawaiian Helicopter and it was excellent and breath taking. It is a bird's eye view that can't be duplicated on the ground.

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 123Project:97377Document:128168

Name: Meadows, Courtney

Received: Jun,09 2023 17:10:11

Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with Blue Hawaiian and it was it was the most emotional experience we had while touring the islands. My belief is air tours is far less impactful than feet on the ground. The way we felt being immersed in the aerial tour while the pilot narrated the history and legends was very emotional - something we couldn't get on any other type of tour.

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 124Project:97377Document:128168

Name: bascelli, Cristina

Received: Jun,09 2023 18:31:39

Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii. I work at blue Hawaiian helicopters and feel this is the lift of all of our guests tours.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with Blue Hawaiian helicopters and it was amazing, beautiful, and something you could never get anywhere else. Kauai is 70% is inaccessible by foot and this island is too beautiful to not experience as much of this island as you can.

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 125Project:97377Document:128168
Name: James, Gregory
Received: Jun,09 2023 18:38:56
Correspondence Type: Web Form
Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air. I have flown 80,000 people and guests say this is the best thing they have ever done in their life! I wanted to do something that makes people happy for a living and they come back in complete joy. National Park beauty from the air adds a special dimension to the human experience and is privilege to share with people making dreams come true with their families. Thank you for your efforts to bring this joy to people from all over the world, people who may not have this freedom in the countries they come from.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with [Name of Operator] and it was [please provide your experience and why you shouldnt be restricted from the experience].

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 126Project:97377Document:128168
Name: Goldsmith, Matthew
Received: Jun,09 2023 19:31:25
Correspondence Type: Web Form
Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with [Name of Operator] and it was [please provide your experience and why you shouldnt be restricted from the experience].

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Thank you!
Matt Golssmith

Correspondence ID: 127Project:97377Document:128168

Name: McGuire, Katelyn

Received: Jun,09 2023 20:50:11

Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with [Name of Operator] and it was [please provide your experience and why you shouldnt be restricted from the experience].

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

We absolutely adored our tour, the accessibility for my mother meant the world to us.

Correspondence ID: 128Project:97377Document:128168

Name: Darnell, Trey

Received: Jun,09 2023 23:16:30

Correspondence Type: Web Form

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

I strenuously oppose the draft ATMP for Mount Rushmore National Memorial. I disagree with the elimination of Interim Operating Authority (IOA) and believe that the National Park Service (NPS) and the Federal Aviation Administration (FAA) failed to complete due diligence to determine the true impacts to the operators, the public, and the Memorials resources in the ATMP process.

According to the NPS documents, on average, from 2017-2019, 3,914 commercial air tours occurred over Mount Rushmore National Memorial Park every year. Under this draft ATMP, commercial air tours will be prohibited within the ATMP boundary of Mount Rushmore National Memorial Park.

The FAA and the NPS failed to reach out to the operators to determine the economic impacts from implementing a radical management plan that so severely restricts overflights. This plan will take \$45 million out of the local economy over 10 years and destroy local institutions that have been in operation since the 1960s.

As the NPS and the FAA have released the Draft Air Tour Management Plan (ATMP) it is very clear that the agencies have an agenda to eliminate the air tour industry. The real harm is not only to the air tour operators, but also to the National Memorial visitors. The ATMP is discriminatory against visitors who choose to experience the National Memorial by aerial sightseeing.

As we move past the pandemic years, many national parks and memorials saw their resources strained by the large number of visitors as the public began to travel again. Air tours are an important option for many visitors conducting a one-in-a-lifetime trip to see famous natural landmarks. Visitors taking advantage of air tours benefit by avoiding traffic, wait times, and walking trails that are inaccessible for the handicapped or elderly, while reducing congestion and demand on park infrastructure. Helicopters represent the single lowest impact form of visitation to our parks. Helicopters reduce traffic congestion, emissions, sound and all ground-based impacts. Nothing is taken from the park except for memories.

The national parks and memorials should be available for all visitors to see. Limiting flights over Mount Rushmore unfairly

limits the elderly, very young, disabled, and others to experience the Memorial. Limiting flights over Mount Rushmore is discriminating to those who might not have the time, resources, or physical ability to see the memorial any other way.

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

By further restricting an already limited number of allowable air tours, we are reducing opportunities to access our parks and memorials in a way that leaves little to no environmental footprint or disturbance. Through carbon-offset efforts and strict altitude requirements to control noise just to name a few efforts air tour operators are working to ensure they are responsible stewards of the nations parks and memorials. There are currently no restrictions or mitigation efforts for loud vehicles operating in Mount Rushmore, some of which make more noise than a passing helicopter.

The elderly, disabled, and young park visitors rely on air tours to enjoy these spectacular places. They should not be denied the opportunity to experience the parks due to age or ability.

Undoubtedly it is essential to preserve the National Parks and Memorials, yet still enable all forms of visitation so that all may enjoy. While I oppose the draft ATMP, commercial air tour operators would welcome collaborative engagement with the FAA, NPS, and all interested parties to benefit the memorial and the visitors.

Correspondence ID: 129Project:97377Document:128168
Name: King, Christopher
Received: Jun,10 2023 01:29:09
Correspondence Type: Web Form
Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with Blue Hawaiian Helicopters and it was an amazing way to see the beauty of Maui from the skies. My wife is disabled and for her to be able to travel this way helps her to see places she will not have access to. We've been on a few helicopter tours and look forward to being able to see more sights this way.

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 130Project:97377Document:128168
Name: Moforton, Doug
Received: Jun,10 2023 05:42:32
Correspondence Type: Web Form
Correspondence: Congratulations.Of all the dumb things to come out of Washington this ranks as the stupidest.

Correspondence ID: 131Project:97377Document:128168
Name: Mckenzie, Jesse J
Received: Jun,10 2023 10:08:21
Correspondence Type: Web Form
Correspondence: We make a family trip to Mt Rushmore every year from Utah and we love to see to whole black hills! This year we were saddened to see that this may be the last time we are able to witness the beautiful and historic mountains around Mount Rushmore from the air. This is the hi light of our vacation every year to fly over Mount Rushmore with black

hills Ariel adventures, that have afforded our whole family including my grandmother who is disabled to get an amazing view of the park that she otherwise would not see from the ground. We need to keep allowing helicopters to fly over the park because it is truly the best way to see the monument! Ps helicopters are far less obnoxious than the thousands of Harley's that we see up around the monument Every year.

Correspondence ID: 132Project:97377Document:128168

Name: gwinn, james

Received: Jun,10 2023 12:21:19

Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with blue Hawaiian and it was wonderful have the ability to see the national parks from the air really was fun the other passenger was not physically able to enjoy the park due to a disability.

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 133Project:97377Document:128168

Name: Alpers, James

Received: Jun,10 2023 14:40:21

Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with Blue Hawaiian and it was magical and allowed my family to view the park in a unique and exhilarating way.

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 134Project:97377Document:128168

Name: Bush, Carly

Received: Jun,10 2023 16:29:54

Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with [Name of Operator] and it was [please provide your experience and why you shouldnt be restricted from the experience]

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 135Project:97377Document:128168

Name: Block, Jessica

Received: Jun,10 2023 16:36:33

Correspondence Type: Web Form

Correspondence: Please do not change air your plans. This opportunity should not be further limited.

I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with [Name of Operator] and it was [please provide your experience and why you shouldnt be restricted from the experience].

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 136Project:97377Document:128168

Name: Gibbon, Cameron

Received: Jun,10 2023 19:45:56

Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with [Name of Operator] and it was [please provide your experience and why you shouldnt be restricted from the experience].

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Regards,

Cameron Gibbon

Correspondence ID: 137Project:97377Document:128168

Name: Borzobohaty, Amy

Received: Jun,10 2023 20:31:14

Correspondence Type: Web Form

Correspondence: Why would you want to do this? Taking away more freedoms and enjoyments. Yet, again destroying another business.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with [Name of Operator] and it was [please provide your experience and why you shouldnt be restricted from the experience].

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 138Project:97377Document:128168
Name: Powell, Chris
Received: Jun,10 2023 23:55:19
Correspondence Type: Web Form
Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with [Name of Operator] and it was [please provide your experience and why you shouldnt be restricted from the experience].

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 139Project:97377Document:128168
Name: Brown, Jessica
Received: Jun,11 2023 11:58:29
Correspondence Type: Web Form
Correspondence: The helicopter experience was something you can't get from the ground removing this will limit people's ability to enjoy the park who physically can't. I would also like to add that this experience let's you enjoy and learn more about the parks without touching or disrupting the actual park itself. Please don't remove this activity that helps bring people to enjoy our resources.

Correspondence ID: 140Project:97377Document:128168
Name: Jaeger, Kimberly
Received: Jun,11 2023 13:58:43
Correspondence Type: Web Form
Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with [Name of Operator] and it was [please provide your experience and why you shouldnt be restricted from the experience].

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Thank you

Correspondence ID: 141Project:97377Document:128168

Name: Sandberg, John
Received: Jun,11 2023 14:05:42
Correspondence Type: Web Form

Correspondence: I am writing with the hopes of providing further insight on the operation of air tours over our national parks and to express commonly shared values on why air tours should be able to continue in the same manner they have in recent years.

Air tours over our national parks have provided the opportunity for people to see the national parks in a way never before thought of. Through my time as a helicopter tour pilot over the Grand Canyon, I have been able to give individuals the greatest experience of their lives which often times result in an emotional and astounding impact on the lives of those people who have chosen to fly with me. Within my tour I express how important it is to preserve and maintain our national parks, that message reaches thousands of different people who fly with me, every year.

The FAA has done an outstanding job at creating a safe Special Flight Rules Area within the Grand Canyon that serves multiple purposes. One of the most critical reasons, which relates to air tours, is the creation of routes which allows for noise abatement over sensitive areas and keeping aircraft away from the general public touring the Grand Canyon to maintain peace and quite. As I have had the experience flying over this very strict routes, I have never once flown over groups of people within the national park trying to enjoy the serenity of nature and the views of the Grand Canyon.

I wholeheartedly believe that these strict regulations are in place for a good reason and that no further restrictions need be placed on air tours over our national parks.

I sincerely hope my opinion as a helicopter pilot, USMC veteran, outdoor enthusiast is valued and taken into account as decisions outside of my control are made.

Thank you for your time.

Correspondence ID: 142Project:97377Document:128168

Name: Lewis, Emmelyn
Received: Jun,11 2023 15:23:12
Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with [Name of Operator] and it was [please provide your experience and why you shouldnt be restricted from the experience].

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks, please.

Correspondence ID: 143Project:97377Document:128168

Name: Lewis, Lora
Received: Jun,11 2023 15:23:55
Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air. These parks are an incredible opportunity for all young and old to experience.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with [Name of Operator] and it was [please provide your experience and why you shouldnt be restricted from the experience].

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 144Project:97377Document:128168
Name: Lewis, Kaitlyn
Received: Jun,11 2023 15:24:01
Correspondence Type: Web Form
Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with [Name of Operator] and it was [please provide your experience and why you shouldnt be restricted from the experience].

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks, please.

Correspondence ID: 145Project:97377Document:128168
Name: Hamilton, Fiona
Received: Jun,11 2023 16:47:20
Correspondence Type: Web Form
Correspondence: It is an amazing way to see the island. Parts that cannot be seen. Tourism is essential.

Correspondence ID: 146Project:97377Document:128168
Name: Sueoka, Kylie
Received: Jun,11 2023 17:37:42
Correspondence Type: Web Form
Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with blue hawaiian helicopters here in Hawaii, and it was phenomenal. I lived in Oahu, Hawaii nearly my entire life, and never have I seen Hawaii like that in my life. It is a view that I never knew existed until I did that flight. It is an opportunity for not only locals, but tourists visiting Hawaii on their once in a lifetime trip, to experience the untouched natural beauty and unique sights around our island. Its a perspective that seeing it on a video or textbook will not do it justice.

The National Parks should be available for all locals and visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 147Project:97377Document:128168
Name: Comazzi, Mary
Received: Jun,12 2023 08:55:59
Correspondence Type: Web Form
Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I strenuously oppose the draft ATMP for Mount Rushmore National Memorial. I strongly disagree with the elimination of Interim Operating Authority (IOA) and believe that the National Park Service (NPS) and the Federal Aviation Administration (FAA) failed to complete due diligence to determine the true impacts to the operators, the public, and the Memorials resources in the ATMP process.

According to the NPS documents, on average, from 2017-2019, 3,914 commercial air tours occurred over Mount Rushmore National Memorial Park every year. Under this draft ATMP, commercial air tours will be prohibited within the ATMP boundary of Mount Rushmore National Memorial Park.

The FAA and the NPS failed to reach out to the operators to determine the economic impacts from implementing a radical management plan that so severely restricts overflights. This plan will take \$45 million out of the local economy over 10 years and destroy local institutions that have been in operation since the 1960s.

As the NPS and the FAA have released the Draft Air Tour Management Plan (ATMP) it is very clear that the agencies have an agenda to eliminate the air tour industry. The real harm is not only to the air tour operators, but also to the National Memorial visitors. The ATMP is discriminatory against visitors who choose to experience the National Memorial by aerial sightseeing.

As we move past the pandemic years, many national parks and memorials saw their resources strained by the large number of visitors as the public began to travel again. Air tours are an important option for many visitors conducting a one-in-a-lifetime trip to see famous natural landmarks. Visitors taking advantage of air tours benefit by avoiding traffic, wait times, and walking trails that are inaccessible for the handicapped or elderly, while reducing congestion and demand on park infrastructure. Helicopters represent the single lowest impact form of visitation to our parks. Helicopters reduce traffic congestion, emissions, sound and all ground-based impacts. Nothing is taken from the park except for memories.

The national parks and memorials should be available for all visitors to see. Limiting flights over Mount Rushmore unfairly limits the elderly, very young, disabled, and others to experience the Memorial. Limiting flights over Mount Rushmore is discriminating to those who might not have the time, resources, or physical ability to see the memorial any other way.

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

By further restricting an already limited number of allowable air tours, we are reducing opportunities to access our parks and memorials in a way that leaves little to no environmental footprint or disturbance. Through carbon-offset efforts and strict altitude requirements to control noise just to name a few efforts air tour operators are working to ensure they are responsible stewards of the nations parks and memorials. There are currently no restrictions or mitigation efforts for loud vehicles operating in Mount Rushmore, some of which make more noise than a passing helicopter.

Undoubtedly it is essential to preserve the National Parks and Memorials, yet still enable all forms of visitation so that all may enjoy. While I oppose the draft ATMP, commercial air tour operators would welcome collaborative engagement with the FAA, NPS, and all interested parties to benefit the memorial and the visitors.

Correspondence ID: 148Project:97377Document:128168
Name: Rogers, Tracy
Received: Jun,12 2023 09:34:15

Correspondence Type: Web Form

Correspondence: Please don't ruin the opportunity for people to view our spectacular monument and area of South Dakota via helicopter tours. The business is an asset to the area and is a well run company that works well with the community.

Correspondence ID: 149Project:97377Document:128168

Name: Garcia, Carlos

Received: Jun,12 2023 11:03:29

Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with Maverick Helicopters and it was a once in a lifetime experience since Im unable to enjoy it at full capacity given my walking disability.

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 150Project:97377Document:128168

Name: Marshall, Bruce

Received: Jun,12 2023 13:22:20

Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with Blue Hawaiian and it was a spectacular experience like no other. The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 151Project:97377Document:128168

Name: Nigro, Patrick

Received: Jun,12 2023 13:32:10

Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with Blue Hawaiian and it was a beautiful experience to firsthand see nature of Maui and the surrounding islands.

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 152Project:97377Document:128168

Name: Payne, William

Received: Jun,12 2023 13:58:52

Correspondence Type: Web Form

Correspondence: The idea of eliminating air tours around Mount Rushmore is very short sighted and based on would and could rather than facts. The air tours put no strain on the infrastructure of the area.

Air tours are a way for the public to view this amazing area without any trace of their presence other than a noise foot print that is only momentary. They allow the old, handicapped and other wised challenged to experience the magnificent scenery. They leave no trash behind. I urge the reconsideration of this proposed restriction.

Correspondence ID: 153Project:97377Document:128168

Name: Blackmore, Mark

Received: Jun,12 2023 17:46:50

Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with [Name of Operator] and it was [please provide your experience and why you shouldnt be restricted from the experience].

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks..

Correspondence ID: 154Project:97377Document:128168

Name: Bontrager, Josh

Received: Jun,12 2023 17:48:18

Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with [Name of Operator] and it was [please provide your experience and why you shouldnt be restricted from the experience].

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks..

Correspondence ID: 155Project:97377Document:128168

Name: Blackmore, Harry

Received: Jun,12 2023 17:50:02

Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with [Name of Operator] and it was [please provide your experience and why you shouldnt be restricted from the experience].

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks..

Correspondence ID: 156Project:97377Document:128168

Name: Blackmore, Sarah

Received: Jun,12 2023 17:50:21

Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with [Name of Operator] and it was [please provide your experience and why you shouldnt be restricted from the experience].

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks..

Correspondence ID: 157Project:97377Document:128168

Name: Bontrager, Nicole

Received: Jun,12 2023 17:50:48

Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with [Name of Operator] and it was [please provide your experience and why you shouldnt be restricted from the experience].

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks..

Correspondence ID: 158Project:97377Document:128168

Name: Bontrager, Cooper

Received: Jun,12 2023 17:53:06

Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with [Name of Operator] and it was [please provide your experience and why you shouldnt be restricted from the experience].

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks..

Correspondence ID: 159Project:97377Document:128168
Name: Stokes, Buddy
Received: Jun,12 2023 20:47:21
Correspondence Type: Web Form
Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with Blue Hawaiian and it was absolutely incredible. We had a land and air tour and given that a majority of the crater road was inaccessible we had views of areas that were otherwise inaccessible. Furthermore many areas have no roads at all and can only be viewed from the air. Not everyone is able to participate in a land tour due to physical limitations and these people should not be discriminated against. I believe that the helicopter company strives to keep noise to a minimum over residential areas and needs some freedom to navigate due to weather changes, etc. Our experience at Volcanoes National Park was better thanks to the helicopter tour and I sincerely hope they will be allowed to continue.

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 160Project:97377Document:128168
Name: Becker, Ellen
Received: Jun,13 2023 09:37:05
Correspondence Type: Web Form
Correspondence: National parks and National Recreation areas are meant for all to enjoy. The National Park Service is over reaching by limiting or eliminating over flights. The public has a right to see all parks by air and these flights should be allowed for all to enjoy.

Correspondence ID: 161Project:97377Document:128168
Name: Mulder, Marilyn
Received: Jun,13 2023 11:15:31
Correspondence Type: Web Form
Correspondence: All helicopters should be permitted to take our visitors over parks for tours. This is AMERICA. Stop closing down choices

Correspondence ID: 162Project:97377Document:128168
Name: Anderson, Kris

Received: Jun,13 2023 11:51:08

Correspondence Type: Web Form

Correspondence: I live just outside the ½ mile boundary from Mt Rushmore National Memorial. I purchased the property in February 1996. The neighborhood was quiet then. Back then there was a helicopter service that existed right in new Keystone area that took tours of Mt Rushmore. I never heard that helicopter. E-v-e-r.

When Black Hills Helicopter opened their first location over near Crazy Horse, at least for my neighborhood this was not a noise issue. However, I was aware of it and was concerned. Since BHH has opened its tours in the Keystone area it has been a noise bane for me and for my neighbors Spring through Fall. Many of us have complained to each other. We open our windows for warm, fresh air and we live and work outside during these seasons. But the peace and quiet that we value, and that is one of the reasons for which we moved to the woods, has been shattered. I can remember days when a helicopter flew over every 15 minutes. Just yesterday I heard 3 pass over within 15 minutes. I've lost count just in the time as I write this protest. A couple summers ago as I lunched outside on the sidewalk in Keystone, a helicopter passed low overhead creating extremely loud noise After the necessary pause in conversation, my companion commented that the business did this obnoxious maneuver when business was slow in order to advertise to tourists the business was available. How callous, self-centered and uncontrolled.

It seems to me that this Spring the noise level has abated somewhat and wondered if I was imagining things. Then I read of the NPS commentary period on MT-ATMP, and I realized that it is very likely that the owner of BHH is once again very self-centered in sole consideration for preserving his business. He very likely is setting the angle of his rotors to abate the noise level, knowing that his type of business is under review. What he is doing is solely thinking of his own wants and not one scrap for his neighbors.

And when I say neighbors, I think not only of myself; but of the wildlife and vegetation that are the neighborhood. I have already heard that helicopters are a scourge in Grand Canyon with many many different tour companies inflicting themselves with their noise and sheer presence. How can people think this is a good way to experience the land, the beauty, the wildlife, the Wonder. Surely one of the functions of park services must be to educate people on what the parks hold in stewardship. Local Moon Walks are a case in point. Human beings simply cannot keep plundering the planet to earn dollars. It saddens me comparing the even more grand architecture of the second location of BHH with that of the first location. Clearly there is a lot of money involved for the business; but at the expense of the livelihood of the woodland flora and fauna. How do they go about their daily business of pursuing prey and avoiding predators with this noise interfering? Do I need to go into carbon footprint?

There are a few things which simply must be banned from use due to noise pollution and actual damage to terrain and habitat - helicopters, ATV's, motorcycles. Let people learn to walk once again quietly and with respect amongst other entities - the other animals, vegetables and minerals with which we share the Earth. Please save our planet.

Correspondence ID: 163Project:97377Document:128168

Name: ,

Received: Jun,13 2023 11:56:58

Correspondence Type: Web Form

Correspondence: Mt. Rushmore National Memorial, the "Shrine of Democracy".

What is a Shrine? According to the Oxford Dictionary

Shrine

noun

1.a place regarded as holy because of its associations with a divinity or a sacred person or relic, marked by a building or other construction.

Do we do justice to the "Shrine of Democracy" when noisy helicopters are permitted to disturb the peace a shrine is so deserving of?

I am not opposed to free enterprise, but when it intrudes upon the peace and quiet so deserving of a Shrine I do!

I strongly object to the helicopters encroaching upon Mt. Rushmore, the "Shrine of Democracy"!!

Sincerely,
Kathy Hackett
Mike Hackett

Correspondence ID: 164Project:97377Document:128168

Name: Shelley, Emma

Received: Jun,13 2023 14:10:34

Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour and it was amazing.

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 165Project:97377Document:128168

Name: Sudduth, Cynthia

Received: Jun,13 2023 19:50:08

Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with [Name of Operator] and it was [please provide your experience and why you shouldnt be restricted from the experience].

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Hawaiian helicopters had a fantastic tour.we saw things we never would have otherwise! We need our national parks to stay open!!

Correspondence ID: 166Project:97377Document:128168

Name: Amezaga, Andrea

Received: Jun,13 2023 20:52:26

Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park.

Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with Blue Hawaiian and it was an AMAZING experience!! Once in a lifetime!

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 167Project:97377Document:128168

Name: Amezaga, Sebastian

Received: Jun,13 2023 20:53:28

Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with Blue Hawaiian and it was amazing I would totally do it again. Our Captain was amazing and provided us with amazing information.

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 168Project:97377Document:128168

Name: Amezaga, Clemente

Received: Jun,13 2023 20:53:37

Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with Blue Hawaiian and it was absolutely incredible and mesmerizing.

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 169Project:97377Document:128168

Name: Ammerman, Rick

Received: Jun,13 2023 21:13:10

Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with Blue Hawaiian and it was beautiful and informative!

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 170Project:97377Document:128168

Name: Valiere, Denelle

Received: Jun,14 2023 01:40:02

Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with Blue Hawaiian Helicopters and it was fantastic.

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 171Project:97377Document:128168

Name: Murray, Michael B

Received: Jun,14 2023 11:12:19

Correspondence Type: Web Form

Correspondence: June 14, 2023

Ms. Michelle Wheatley, Superintendent
Mount Rushmore National Memorial
13000 Highway 244
Building 31, Suite 1
Keystone, SD 57751

Subject: Proposed Air Tour Management Plan and Environmental Assessment for Mount Rushmore National Memorial

Dear Superintendent Wheatley:

I am writing on behalf of over 2,400 members of the Coalition to Protect America's National Parks (Coalition), all of whom have worked or volunteered for the National Park Service (NPS) and who collectively represent more than 45,000 years of national park management experience. The Coalition studies, educates, speaks, and acts for the preservation of America's National Park System. Among our members are former NPS directors, regional directors, superintendents, resource specialists, rangers, maintenance and administrative staff, and a full array of other former employees, volunteers, and supporters.

We offer the following comments for your consideration regarding the proposed Air Tour Management Plan (ATMP) and Environmental Assessment (EA) for Mount Rushmore National Memorial (MORU or Park).

GENERAL COMMENTS

1. First, we commend the agencies for preparing a proper environmental assessment (EA) for the proposed ATMP that considers a range of alternatives and evaluates the potential impacts of those alternatives -When considering a proposed agency action, such as a new ATMP, NPS must comply with the National Environmental Policy Act (NEPA) and related guidance, including the Council on Environmental Quality (CEQ) NEPA implementing regulations (40 CFR Parts 1500-1508) and with the agency's own NEPA guidance found in the NPS NEPA Handbook 2015. We have been deeply concerned

that NPS has failed to comply with basic NEPA guidance by issuing numerous previous "proposed ATMPs" for other parks without considering a reasonable range of alternatives and without preparing any sort of NEPA analysis for public review. We applaud you and the planning team for following the appropriate NEPA process requirements that the MORU proposal deserves.

2. Compliance with the NPS Organic Act (54 USC §100101) is integral to compliance with the National Parks Air Tour Management Act (49 USC §40128), yet the EA barely mentions the Organic Act or its relevance - Section 802 (Findings) of the National Parks Air Tour Management Act (NPATMA) states, in part: "Congress finds that--

- (1) the Federal Aviation Administration has sole authority to control airspace over the United States;
- (2) the Federal Aviation Administration has 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;
- (3) the National Park Service has the responsibility of conserving the scenery and natural and historic objects and wildlife in national parks and of providing for the enjoyment of the national parks in ways that leave the national parks unimpaired for future generations[]" (Emphasis added)

The NPS "responsibility for conserving" park resources and values mentioned in subsection # 3 of the NPATMA above derives directly from the NPS Organic Act of 1916 and is often referred to as the NPS "conservation mandate." As described in NPS Management Policies 2006, Section 1.4.1: "The most important statutory directive for the National Park Service is provided by interrelated provisions of the NPS Organic Act of 1916 and the NPS General Authorities Act of 1970, including amendments to the latter law enacted in 1978." As further stated in Management Policies Section 1.4.3:

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

Given that both the proposed ATMP and EA are or should be focused on evaluating potential impacts of commercial air tours on the Park's natural and cultural resources, visitor experiences, and tribal lands within and adjacent to the Park, we would expect the NPS conservation mandate to serve as a key basis for evaluating those impacts. However, we are quite concerned that the EA barely mentions the Organic Act (e.g., it is mentioned once at EA p. 78). In our view, the NPS conservation mandate is so important to the management of air tours in national parks that Congress chose to embed a key portion of the Organic Act in Section 802(3) of the NPATMA. To address this concern, we recommend that a section summarizing applicable laws relevant to the proposed action, including the NPS Organic Act, be added to Chapter 1 or as an appendix.

3. The EA appropriately considers the 2015 Foundation Document for Mount Rushmore National Memorial, which provides important context for the planning process regarding the Park's significance and fundamental resources that could be adversely affected by commercial air tours - As described in the Foundation Document, fundamental resources and values help focus planning and management efforts on what is truly significant about the Park. Fundamental resources and values are "those qualities that are essential (fundamental) to achieving the purpose of the park and maintaining its significance." (Emphasis added)

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

In brief, protecting the Park's "natural setting" from visual and noise intrusions of low-flying air tours is fundamental to conserving the resources, values, and visitor experience opportunities that make Mount Rushmore a special place.

4. Consistent with NPS Management Policies Section 1.5, the EA should include an "appropriate use analysis" for the proposed action - Management Policies Section 1.5 states, in part: "An 'appropriate use' is a use that is suitable, proper, or fitting for a particular park, or to a particular location within a park. Not all uses are appropriate or allowable in units of the national park system, and what is appropriate may vary from one park to another and from one location to another within a park...When proposed park uses and the protection of park resources and values come into conflict, the protection of resources and values must be predominant. A new form of park use may be allowed within a park only after a determination has been made in the professional judgment of the superintendent that it will not result in unacceptable impacts." (Emphasis added)

The NPATMA established procedural requirements for allowing air tours over parks; however, the Act does NOT mandate that commercial air tours are appropriate and must be allowed. In fact, section (b)(3)(A) of the Act provides that the agencies "may prohibit commercial air tour operations over a national park in whole or in part." Under the Act, air tours are essentially a discretionary activity subject to agency approval. As far as we know, NPS has never formally considered or determined whether commercial air tours are an appropriate use of (or over) MORU. As a result, we strongly recommend that the EA be amended (e.g., through errata or as an appendix) to include an appropriate use analysis as described in Management Policies Section 1.5. Given the many adverse impacts of air tours that are described in the EA, we would expect that such an analysis would find that commercial air tours are NOT an appropriate use of (or over) MORU.

5. The eventual decision document for the ATMP should include an "impairment determination" for the proposed action - NPS Management Policies Section 1.4.7, states, in part: "Before approving a proposed action that could lead to an impairment of park resources and values, an NPS decision-maker must consider the impacts of the proposed action and determine, in writing, that the activity will not lead to an impairment of park resources and values. If there would be an impairment, the action must not be approved." (Emphasis added) Furthermore, "[t]he impact threshold at which impairment occurs is not always readily apparent. Therefore, the Service will apply a standard that offers greater assurance that impairment will not occur. The Service will do this by avoiding impacts that it determines to be unacceptable. These are impacts that fall short of impairment, but are still not acceptable within a particular park's environment." (Emphasis added) As a result, we strongly recommend that the eventual decision document, presumably a Finding of No Significant Impact (FONSI), includes an impairment determination as described in Management Policies Section 1.4.7.

6. Section 8.0 ("Amendment") of the ATMP itself should be revised - We have a significant concern about Section 8.0 in the proposed ATMP. This section of the ATMP is not described in the EA. The boilerplate language used in Section 8 (ATMP p. 5) states that "the ATMP may be amended at any time" (emphasis added) if either NPS or the FAA notifies the other agency. We imagine that the Amendment clause is intended to convey the concept that the ATMP could be updated and revised if/when the agencies determine it is needed and appropriate; and we fully understand that all management plans are subject to future change.

However, the use of the words "at any time" creates the distinct impression that reversal of the ATMP decision and/or resumption of air tours at MORU could happen on relatively short-notice (i.e., "at any time"). Such wording suggests there is little certainty that elimination of air tours at MORU would be a durable decision (since it could be changed "at any time"). In our view, creating such uncertainty in the ATMP unnecessarily invites industry appeals and/or political intervention on behalf of air tour operators. Our observation has been that many NPS management decisions that curtail or eliminate controversial recreational and commercial activities in parks, such as off-road vehicle (ORV) use, hunting, and in this case commercial air tours, are often subject to industry lobbying and/or political reversal, especially if/when there is a change in administration.

Over 20 years after the passage of the NPATMA, litigation was needed to force the agencies to finally prepare the required ATMPs. Moving forward, it is critical that the new ATMPs are widely viewed as providing for reliable long-term air tour management at the individual parks involved, rather than leave room for uncertainty about their longevity. Toward that end, we recommend that the agencies revise the wording of Section 8.0 of the ATMP itself to state the following:

(add new first sentence) This ATMP will remain in effect until amended or terminated by mutual agreement of the agencies. This ATMP may be amended at any time (i.e., delete: "at any time"): if the NPS, by notification to the FAA and the operator(s), determines that the ATMP is not adequately protecting Park resources and/or visitor enjoyment; if the FAA, by notification to the NPS and the operator(s), determines that the ATMP is adversely affecting aviation safety and/or the

national aviation system; or, if the agencies determine that appropriate changes to this ATMP are necessary to address new information or changed circumstances.

These minor revisions would affirm the intended stability and longevity of the ATMP; and refocus the Amendment provision on the limited circumstances that could justify reconsideration of the ATMP, rather than on the infinite possibility of amending the ATMP.

SECTION-BY-SECTION COMMENTS ABOUT THE EA

Chapter 1

1. Section 1.4 Purpose and Need - As explained in General Comment # 2 above, compliance with the NPS Organic Act (54 USC §100101) is an integral component of the National Parks Air Tour Management Act (49 USC §40128), yet the EA barely mentions the Organic Act or its relevance. As stated in EA section 1.4, "The purpose of the ATMP is to comply with the Act and other applicable laws..." (Emphasis added) This would seem to be the perfect opportunity to identify the "other applicable" laws, such as the NPS Organic Act and the MORU enabling legislation, that the agencies may have considered during the development of the ATMP. This could be addressed by providing a brief summary of "other applicable laws" in Chapter 1 or as an appendix to the EA.

2. Section 1.5 Environmental Impact Categories Not Analyzed in Detail - As described in this section, the agencies have appropriately identified a number of impact categories that were considered but not analyzed in detail. In our view, the dismissed categories are generally not relevant or significant to the analysis; and the impact categories that have been carried forward for detailed analysis in the EA include the most relevant or significant impact topics for the analysis that follows in Chapter 3 of the EA.

Chapter 2

1. Section 2.1 Alternatives Development - We appreciate the detailed description of how the ATMP preliminary alternatives were developed primarily by an NPS inter-disciplinary team and then reviewed by the FAA. We also appreciate the detailed references to the park's Foundation Document purposes and management objectives, which helped inform development of the alternatives. In general, we believe that the agencies have developed and considered an appropriate range of alternatives. It is also very appropriate that the alternative of "Air Tours Above Existing Levels or Air Tours at Existing Levels with Current Operating Parameters" was eliminated from further study for the reasons stated in Section 2.2.1.

2. Section 2.4 Alternative 1 (No Action Alternative) - As described in this section, "[t]he No Action Alternative represents a continuation of what is currently flown under existing conditions..." We strongly agree with the statement that "[t]he No Action Alternative provides a basis for comparison but is not a selectable alternative because it does not meet the purpose and need for the ATMP (refer to Section 1.4, Purpose and Need)." (Emphasis added) It is evident from the impact analysis of the No Action Alternative in Chapter 3 that the existing air tour situation at MORU is causing unacceptable impacts to park resources and values that are supposed to be conserved unimpaired under the NPS Organic Act.

3. Section 2.5 Alternative 2 (Preferred Alternative) - As described, Alternative 2 would prohibit commercial air tours within the ATMP planning area no later than 180 days after the ATMP is signed by all required signatories from both agencies. We strongly support the selection of Alternative 2 as the Preferred Alternative for the reason described in the EA, which is: "Alternative 2 provides the greatest level of protection for the purpose, resources, and values of the Park."

4. Section 2.6 Alternative 3 - Alternative 3 would authorize 3,657 commercial air tours per year within the ATMP planning area. Thus, it would authorize approximately 93% of the existing number of flights based on the three-year average of reporting data from 2017-2019 (see Table 2). Alternative 3 includes four routes for the helicopter operator and one route for the fixed-wing operator, all with varying distances and altitudes across the ATMP planning area. Flights would be permitted to operate one hour after sunrise until one hour before sunset, as defined by the National Oceanic and Atmospheric Administration (NOAA). Helicopter tours would be conducted within an altitude range from 5,500 ft. to 7,000 ft. MSL, which would result in a minimum altitude 900 ft. AGL. Commercial air tours on fixed-wing aircraft would be conducted at a

minimum altitude of 6,500 ft. MSL which results in minimum altitudes that range from 1,300 ft. to 2,100 ft. AGL. Alternative 3 also includes other operating parameters such as daily caps on the number of flights. As described in the impact analyses in Chapter 3, Alternative 3 would result in reduced impacts compared to the No Action Alternative, but Alternative 3 would provide considerably less resource protection than the Preferred Alternative, elimination of air tours at MORU.

Chapter 3

Chapter 3 includes comparative analyses of the respective alternatives on various impact categories (i.e., resources or uses that would be affected by air tours) at MORU. Nearly every analysis indicates that Alternative 2, the elimination of air tours at MORU, would provide the greatest level of protection and/or restoration of resources at the park. Our comments below are focused on the impact categories that we believe would receive the most significant benefits of implementing Alternative 2.

1. Section 3.1 Noise and Noise-Compatible Land Use - This section includes appropriate references to relevant FAA and NPS policies. Specifically, FAA Order 1050.1F, paragraph 11-5.b(10) defines a noise sensitive area as "[a]n area where noise interferes with normal activities associated with its use. Normally, noise sensitive areas include residential, educational, health, religious structures and sites, parks, recreational areas, areas with Wilderness characteristics, wildlife refuges, and cultural and historical sites." (Emphasis added) In other words, the entirety of MORU is considered a noise sensitive area under the FAA order.

NPS Management Policies (2006) Section 4.9, Soundscape Management, directs the NPS to preserve soundscapes and the acoustic environment to the greatest extent possible and to restore these resources to their natural condition wherever they have become degraded by noise and unwanted sounds. In other words, NPS management policies direct NPS to restore the natural soundscape at MORU that has been adversely impacted by air tour noise.

Section 3.1's comparative analysis of the noise levels likely to be caused by the respective alternatives strongly supports Alternative 2 (the NPS Preferred Alternative) as the alternative with the greatest likelihood of restoring the natural soundscape at MORU, consistent with FAA Order 1050.1F and NPS Management Policies Section 4.9. In contrast, both Alternatives 3 and 4 would perpetuate some level of air tour noise impacts.

2. Section 3.3 Biological Resources - This section includes analyses of the potential impacts of air tours on biological resources, specifically birds and mammals, including multiple species that are federally listed as threatened or endangered. As described in the analysis, multiple protected bird and mammal species are adversely impacted by aircraft noise. Alternative 2 (elimination of air tours) would provide the greatest level of protection to the park's biological resources and would likely "have no effect on federally listed threatened or endangered species." See EA Appendix H. For this reason, we fully support selection and implementation of Alternative 2.

3. Section 3.4 Cultural Resources - The National Historic Preservation Act (NHPA), 54 U.S.C. §§ 300101 et seq., is comprehensive federal preservation legislation intended to protect cultural resources. Section 106 of the NHPA (54 U.S.C. § 306108), as implemented in 36 CFR Part 800, requires federal agencies to consider the effects of undertakings on historic properties, should any such properties exist. In addition to Section 106 of the NHPA, the NPS's Organic Act* and Section 110 of the NHPA apply to and provide for the preservation of historic, ethnographic and cultural resources on parkland. (*This is a rare instance in which the EA actually mentions the NPS Organic Act.)

Table 15 in the EA identifies 17 cultural resources within the Area of Potential Effect (APE), inclusive of ethnographic resources, traditional cultural properties (TCPs), sacred sites, cultural landscapes, historic districts, and prehistoric and historic buildings and structures. Cultural resources of importance to Native American tribes are particularly noteworthy. The Lakota and many other tribes consider the Black Hills sacred; Bear Butte at the northeast edge of the Black Hills is a popular worship site. The region was used by numerous Native American groups for resource gathering, including food, medicine, and timber, and for religious purposes. For the purposes of this draft EA, the agencies assume that all lands within the Park have spiritual and sacred qualities and consider the entire Park a TCP.

As described in the EA, the elimination of commercial air tours from the ATMP planning area would reduce the direct noise and visual intrusions on feeling and setting of cultural resources within the APE and result in beneficial impacts to ethnographic resources and sacred sites, TCPs, archeological resources, cultural landscapes, historic districts, and prehistoric

and historic buildings and structures compared to existing conditions. In other words, Alternative 2 would provide the greatest level of protection for the diverse cultural resources within the APE. For this reason, we fully support the selection and implementation of Alternative 2 as it would be the most appropriate alternative to implement under applicable NHPA, FAA, and NPS cultural resource guidelines and policies.

4. Section 3.5 Wilderness - The Wilderness Act of 1964 is the primary federal legislation regulating the management of designated Wilderness areas. While Wilderness is not an impact category the FAA traditionally examines, the Black Elk Wilderness to the south and west of the Park is managed by the U.S. Forest Service (USFS) and is inside the ATMP planning area. The USFS agreed to be a cooperating agency and has participated in the development of the draft ATMP, this draft EA, and associated planning efforts. The USFS manages Wilderness for the following qualities of Wilderness character (Forest Service Manual 2300, 2021):

- Untrammeled; Unhindered and free from the actions of modern human control or manipulation.
- Natural: Ecological systems are substantially free from the effects of modern civilization.
- Undeveloped: Retaining primeval character and influence without permanent improvements or modern human occupation.
- Solitude or Primitive and Unconfined Recreation: Ability to provide outstanding opportunities for solitude or primitive and unconfined type of recreation.
- Other features of value: Wilderness preserves other features of value that are of scientific, educational, scenic, or historical value.

Air tours would have no direct effect on the "untrammeled" and undeveloped" qualities of the Black Elk Wilderness; while potential impacts to "other features" (e.g., cultural resources) are evaluated elsewhere in the EA. As a result, the EA analysis focuses on potential impacts to the "natural" and "solitude" qualities of Wilderness character. The analysis indicates that Alternative 2 (elimination of air tours) would provide the lowest level of air tour noise intrusion into Wilderness areas within the planning area adjacent to park and therefore would provide the greatest level of protection to Wilderness character. As a result, we fully support Alternative 2 as the most appropriate alternative to implement under applicable USFS wilderness stewardship policies.

5. Section 3.6 Visitor Use and Experience and Other Recreational Opportunities - While visitor experience is not an impact category the FAA traditionally examines, the NPS has agency wide guidelines for managing visitors within the National Park System (e.g., NPS Management Policies § 8.2, 2006). This section also examines impacts to air tour customers.

As described in the EA, visitors come to the Park from all around the U.S. and the world to view the 60 ft. tall granite faces of four American presidents carved out of Mount Rushmore and framed by the natural scenery of the Black Hills. Between 2017 and 2019, the Park averaged 2.2 million visitors annually; and visitation was approximately 2.5 million in 2021 (NPS, 2021b). Nearly 500,000 visitors participate in interpretive programs at the Park each year, representing a substantial portion of the Park's overall visitation. Approximately 90% of visitors remain within the immediate vicinity of the sculpture and visitor services, while 10% explore the backcountry areas (Littlejohn and Le, 2014).

In contrast to the 2.5 million people who visited the park on the ground in 2021, an average of 19,570 air tour customers per year (less than 0.8% of total park visitors) currently experience the park by air. The air tour experience generally focuses on viewing the sculpture from a variety of angles, typically from south- to-southeast of the sculpture. Existing air tour routes at MORU (see Figure 17) are concentrated over the southern portion of the Park near the visitor center and sculpture and directly impact the most highly visited areas of MORU.

As a result, every alternative that would allow continued commercial air tours at MORU at any level would adversely impact the experiences of a high number of park visitors on the ground, while providing an air tour experience to a comparatively limited number of air tour customers annually. How is it acceptable for the possibly positive experiences of several people on a helicopter tour to negatively impact dozens or hundreds of other park visitors on the ground? For these reasons, we fully support the "elimination of air tours" as the most appropriate alternative to select and implement at MORU.

6. Section 3.8 Visual Effects - As described in this section, "visual resources include buildings, sites, traditional cultural properties, and other natural or manmade landscape features that are visually important or have unique characteristics... Visual character refers to the overall visual makeup of the existing environment where the alternatives would

be located." Within the Park, visual resources include the sculpture and forested areas. Viewer sensitivity to the carving is very high due to the massiveness of the sculpture and the historical and social significance of the presidents memorialized by the sculpture.

Studies indicate that aircraft noise in national parks can impact human perceptions of aesthetic quality of viewsheds (Weinzimmer et al., 2014; Benfield et al., 2018). Impacts to visual resources and visual character relate to a decrease in the aesthetic quality of the park resulting from air tours. In general, commercial air tours detract from the visitor's opportunity to observe these resources when commercial air tours are present (which currently occurs 38 times per day during a peak month average day).

The comparative analysis clearly indicates that Alternative 2 (elimination of air tours) would provide the greatest level of protection to the park's visual resources. For this reason, we strongly support the selection and implementation of Alternative 2, which would eliminate air tours at MORU.

7. Section 3.10 Summary of Environmental Consequences - Table 18 provides a side-by-side comparison of the environmental consequences for each of the alternatives considered across each environmental impact category. This comparison provides overwhelming evidence that Alternative 2 would provide the greatest level of protection to or within the various impact categories analyzed in the EA. For this reason, we strongly support selection and implementation of Alternative 2, the elimination of air tours at MORU.

CLOSING COMMENT

In closing, we greatly appreciate that the agencies have prepared a proper EA that evaluates the impacts of a range of air tour alternatives at Mount Rushmore National Memorial. The information and analysis provided in the EA provide overwhelming evidence that Alternative 2, elimination of air tours, is the most appropriate alternative to implement at the Park. We appreciate the opportunity to comment on this important issue.

Sincerely,

Michael B. Murray, Chair
Coalition to Protect America's National Parks editor@protectnps.org
2 Massachusetts Ave NE, Unit 77436
Washington, DC 20013

cc: Bert Frost, Director of Regions 3, 4, and 5, National Park Service
Ray Sauvajot, Associate Director for Natural Resource Stewardship and Science, NPS
Karen Trevino, Chief, Natural Sounds and Night Skies Division, National Park Service

Correspondence ID: 172Project:97377Document:128168

Name: Brackett, Roy

Received: Jun,14 2023 11:48:02

Correspondence Type: Web Form

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

I strenuously oppose the draft ATMP for Mount Rushmore National Memorial. I disagree with the elimination of Interim Operating Authority (IOA) and believe that the National Park Service (NPS) and the Federal Aviation Administration (FAA) failed to complete due diligence to determine the true impacts to the operators, the public, and the Memorials resources in the ATMP process.

According to the NPS documents, on average, from 2017-2019, 3,914 commercial air tours occurred over Mount Rushmore National Memorial Park every year. Under this draft ATMP, commercial air tours will be prohibited within the ATMP boundary of Mount Rushmore National Memorial Park.

The FAA and the NPS failed to reach out to the operators to determine the economic impacts from implementing a radical management plan that so severely restricts overflights. This plan will take \$45 million out of the local economy over 10 years and destroy local institutions that have been in operation since the 1960s.

As the NPS and the FAA have released the Draft Air Tour Management Plan (ATMP) it is very clear that the agencies have an agenda to eliminate the air tour industry. The real harm is not only to the air tour operators, but also to the National Memorial visitors. The ATMP is discriminatory against visitors who choose to experience the National Memorial by aerial sightseeing.

As we move past the pandemic years, many national parks and memorials saw their resources strained by the large number of visitors as the public began to travel again. Air tours are an important option for many visitors conducting a one-in-a-lifetime trip to see famous natural landmarks. Visitors taking advantage of air tours benefit by avoiding traffic, wait times, and walking trails that are inaccessible for the handicapped or elderly, while reducing congestion and demand on park infrastructure. Helicopters represent the single lowest impact form of visitation to our parks. Helicopters reduce traffic congestion, emissions, sound and all ground-based impacts. Nothing is taken from the park except for memories.

The national parks and memorials should be available for all visitors to see. Limiting flights over Mount Rushmore unfairly limits the elderly, very young, disabled, and others to experience the Memorial. Limiting flights over Mount Rushmore is discriminating to those who might not have the time, resources, or physical ability to see the memorial any other way.

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

By further restricting an already limited number of allowable air tours, we are reducing opportunities to access our parks and memorials in a way that leaves little to no environmental footprint or disturbance. Through carbon-offset efforts and strict altitude requirements to control noise just to name a few efforts air tour operators are working to ensure they are responsible stewards of the nations parks and memorials. There are currently no restrictions or mitigation efforts for loud vehicles operating in Mount Rushmore, some of which make more noise than a passing helicopter.

Undoubtedly it is essential to preserve the National Parks and Memorials, yet still enable all forms of visitation so that all may enjoy. While I oppose the draft ATMP, commercial air tour operators would welcome collaborative engagement with the FAA, NPS, and all interested parties to benefit the memorial and the visitors.

You must realize some of us have work hard all our lives, paid our taxes and support our communities to make this country what it is today. Then, as we turn older our health is not what it use to be and preventing us from seeing up close the great craftsmanship of Mount Rushmore is hatred towards the public.

NPS should be helping the public have easy access to these great man made monuments from the ground or the AIR.

Correspondence ID: 173Project:97377Document:128168

Name: mayer, Camilla

Received: Jun,14 2023 12:21:08

Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with Blue Hawaiian Helicopters and it was [please provide your experience and why you shouldnt be restricted from the experience].

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 174Project:97377Document:128168
Name: Hamilton, Amy
Received: Jun,14 2023 13:13:39
Correspondence Type: Web Form
Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via the air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with [Name of Operator] and it was [please provide your experience and why you shouldnt be restricted from the experience].

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 175Project:97377Document:128168
Name: Johnson, Michael
Received: Jun,14 2023 13:16:53
Correspondence Type: Web Form
Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I truly do support air tours but also drone operators as well.

Perhaps 1 week of each month No helicopter operations but drone operators can get permits to fly within the park.

A ban on activities of the law abiding types will result in an increase of unlawful activity by scofflaws type and is an inevitable consequence.

Some on this country want to ban guns but such a ban if imposed would not have any affect on criminal types because they dont follow laws anyway.

Likewise a ban on helicopters and airplanes would result in a dramatic increase of illegal drone activity. Drone operators are much harder to catch than licensed aircraft operators who are not following regulations.

I strenuously oppose the draft ATMP for Mount Rushmore National Memorial. I disagree with the elimination of Interim Operating Authority (IOA) and believe that the National Park Service (NPS) and the Federal Aviation Administration (FAA) failed to complete due diligence to determine the true impacts to the operators, the public, and the Memorials resources in the ATMP process.

According to the NPS documents, on average, from 2017-2019, 3,914 commercial air tours occurred over Mount Rushmore National Memorial Park every year. Under this draft ATMP, commercial air tours will be prohibited within the ATMP boundary of Mount Rushmore National Memorial Park.

The FAA and the NPS failed to reach out to the operators to determine the economic impacts from implementing a radical management plan that so severely restricts overflights. This plan will take \$45 million out of the local economy over 10 years and destroy local institutions that have been in operation since the 1960s.

As the NPS and the FAA have released the Draft Air Tour Management Plan (ATMP) it is very clear that the agencies have an agenda to eliminate the air tour industry. The real harm is not only to the air tour operators, but also to the National Memorial visitors. The ATMP is discriminatory against visitors who choose to experience the National Memorial by aerial sightseeing.

As we move past the pandemic years, many national parks and memorials saw their resources strained by the large number of visitors as the public began to travel again. Air tours are an important option for many visitors conducting a one-in-a-lifetime trip to see famous natural landmarks. Visitors taking advantage of air tours benefit by avoiding traffic, wait times, and walking trails that are inaccessible for the handicapped or elderly, while reducing congestion and demand on park infrastructure. Helicopters represent the single lowest impact form of visitation to our parks. Helicopters reduce traffic congestion, emissions, sound and all ground-based impacts. Nothing is taken from the park except for memories.

The national parks and memorials should be available for all visitors to see. Limiting flights over Mount Rushmore unfairly limits the elderly, very young, disabled, and others to experience the Memorial. Limiting flights over Mount Rushmore is discriminating to those who might not have the time, resources, or physical ability to see the memorial any other way.

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

By further restricting an already limited number of allowable air tours, we are reducing opportunities to access our parks and memorials in a way that leaves little to no environmental footprint or disturbance. Through carbon-offset efforts and strict altitude requirements to control noise just to name a few efforts air tour operators are working to ensure they are responsible stewards of the nations parks and memorials. There are currently no restrictions or mitigation efforts for loud vehicles operating in Mount Rushmore, some of which make more noise than a passing helicopter.

Undoubtedly it is essential to preserve the National Parks and Memorials, yet still enable all forms of visitation so that all may enjoy. While I oppose the draft ATMP, commercial air tour operators would welcome collaborative engagement with the FAA, NPS, and all interested parties to benefit the memorial and the visitors.

Correspondence ID:	176Project:97377Document:128168
Name:	Scott, Larkin
Received:	Jun,14 2023 14:20:07
Correspondence Type:	Web Form
Correspondence:	Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

As a pilot and avid camper, I appreciate nature as well as aviation. I believe in keeping the impact to parks limited. That being said, I strenuously oppose the draft ATMP for Mount Rushmore National Memorial. I disagree with the elimination of Interim Operating Authority (IOA) and believe that the National Park Service (NPS) and the Federal Aviation Administration (FAA) failed to complete due diligence to determine the true impacts to the operators, the public, and the Memorials resources in the ATMP process.

According to the NPS documents, on average, from 2017-2019, 3,914 commercial air tours occurred over Mount Rushmore National Memorial Park every year. Under this draft ATMP, commercial air tours will be prohibited within the ATMP boundary of Mount Rushmore National Memorial Park.

The FAA and the NPS failed to reach out to the operators to determine the economic impacts from implementing a radical management plan that so severely restricts overflights. This plan will take \$45 million out of the local economy over 10 years and destroy local institutions that have been in operation since the 1960s.

As the NPS and the FAA have released the Draft Air Tour Management Plan (ATMP) it is very clear that the agencies have an agenda to eliminate the air tour industry. The real harm is not only to the air tour operators, but also to the National

Memorial visitors. The ATMP is discriminatory against visitors who choose to experience the National Memorial by aerial sightseeing.

As we move past the pandemic years, many national parks and memorials saw their resources strained by the large number of visitors as the public began to travel again. Air tours are an important option for many visitors conducting a one-in-a-lifetime trip to see famous natural landmarks. Visitors taking advantage of air tours benefit by avoiding traffic, wait times, and walking trails that are inaccessible for the handicapped or elderly, while reducing congestion and demand on park infrastructure. Helicopters represent the single lowest impact form of visitation to our parks. Helicopters reduce traffic congestion, emissions, sound and all ground-based impacts. Nothing is taken from the park except for memories.

The national parks and memorials should be available for all visitors to see. Limiting flights over Mount Rushmore unfairly limits the elderly, very young, disabled, and others to experience the Memorial. Limiting flights over Mount Rushmore is discriminating to those who might not have the time, resources, or physical ability to see the memorial any other way.

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

By further restricting an already limited number of allowable air tours, we are reducing opportunities to access our parks and memorials in a way that leaves little to no environmental footprint or disturbance. Through carbon-offset efforts and strict altitude requirements to control noise just to name a few efforts air tour operators are working to ensure they are responsible stewards of the nations parks and memorials. There are currently no restrictions or mitigation efforts for loud vehicles operating in Mount Rushmore, some of which make more noise than a passing helicopter.

Undoubtedly it is essential to preserve the National Parks and Memorials, yet still enable all forms of visitation so that all may enjoy. While I oppose the draft ATMP, commercial air tour operators would welcome collaborative engagement with the FAA, NPS, and all interested parties to benefit the memorial and the visitors.

Correspondence ID: 177Project:97377Document:128168
Name: Aguilar, Angel
Received: Jun,14 2023 14:24:56
Correspondence Type: Web Form
Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with [Name of Operator] and it was [please provide your experience and why you shouldnt be restricted from the experience].

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 178Project:97377Document:128168
Name: Cusma, Lauryn
Received: Jun,14 2023 15:34:46
Correspondence Type: Web Form
Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with Blue Hawaiian Helicopters and it was the most beautiful experience ever.

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 179Project:97377Document:128168

Name: Cusma, Kristyn

Received: Jun,14 2023 15:35:49

Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with Blue Hawaiian Helicopters and it was [please provide your experience and why you shouldnt be restricted from the experience].

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 180Project:97377Document:128168

Name: Renninger, Veronica

Received: Jun,14 2023 16:22:36

Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with blue hawaiiian and it was such an amazing and one of a kind experience.

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 181Project:97377Document:128168

Name: Timm, Gina

Received: Jun,14 2023 16:43:39

Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with [Blue Hawaiian Helicopters] and it was [please provide your experience and why you shouldnt be restricted from the experience].

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 182Project:97377Document:128168
Name: Timm, Claire
Received: Jun,14 2023 16:45:31
Correspondence Type: Web Form
Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with Blue Hawaiian Helicopter and it was amazing and should remain open for the pretty views!

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 183Project:97377Document:128168
Name: Timm, Catherine
Received: Jun,14 2023 16:45:56
Correspondence Type: Web Form
Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with blue hawaiian helicopters and it was so cool. It was such a different vibe to see the island from above. Yesterday we drove to see the Wailua Falls, but it was a much better experience to see it from above.

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 184Project:97377Document:128168
Name: Bundy, Jennifer
Received: Jun,14 2023 16:54:47
Correspondence Type: Web Form
Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with Blue Hawaiian and it was amazing! We saw the volcano and craters from

perspectives and with views that we would never have been able to see otherwise.

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 185Project:97377Document:128168

Name: Hitchcock, Christie

Received: Jun,14 2023 16:55:26

Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with [Name of Operator] and it was [please provide your experience and why you shouldnt be restricted from the experience].

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks. Thank you

Correspondence ID: 186Project:97377Document:128168

Name: Tesar, Thomas

Received: Jun,14 2023 17:32:17

Correspondence Type: Web Form

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

Speaking as a totally disabled elderly citizen, who has taken air tours in the past,

I strenuously oppose the draft ATMP for Mount Rushmore National Memorial. I disagree with the elimination of Interim Operating Authority (IOA) and believe that the National Park Service (NPS) and the Federal Aviation Administration (FAA) failed to complete due diligence to determine the true impacts to the operators, the public, and the Memorials resources in the ATMP process.

According to the NPS documents, on average, from 2017-2019, 3,914 commercial air tours occurred over Mount Rushmore National Memorial Park every year. Under this draft ATMP, commercial air tours will be prohibited within the ATMP boundary of Mount Rushmore National Memorial Park.

The FAA and the NPS failed to reach out to the operators to determine the economic impacts from implementing a radical management plan that so severely restricts overflights. This plan will take \$45 million out of the local economy over 10 years and destroy local institutions that have been in operation since the 1960s.

As the NPS and the FAA have released the Draft Air Tour Management Plan (ATMP) it is very clear that the agencies have an agenda to eliminate the air tour industry. The real harm is not only to the air tour operators, but also to the National Memorial visitors. The ATMP is discriminatory against visitors who choose to experience the National Memorial by aerial sightseeing.

As we move past the pandemic years, many national parks and memorials saw their resources strained by the large number of visitors as the public began to travel again. Air tours are an important option for many visitors conducting a one-in-a-lifetime trip to see famous natural landmarks. Visitors taking advantage of air tours benefit by avoiding traffic, wait times, and walking trails that are inaccessible for the handicapped or elderly, while reducing congestion and demand on park infrastructure. Helicopters represent the single lowest impact form of visitation to our parks. Helicopters reduce traffic congestion, emissions, sound and all ground-based impacts. Nothing is taken from the park except for memories.

The national parks and memorials should be available for all visitors to see. Limiting flights over Mount Rushmore unfairly limits the elderly, very young, disabled, and others to experience the Memorial. Limiting flights over Mount Rushmore is discriminating to those who might not have the time, resources, or physical ability to see the memorial any other way.

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

By further restricting an already limited number of allowable air tours, we are reducing opportunities to access our parks and memorials in a way that leaves little to no environmental footprint or disturbance. Through carbon-offset efforts and strict altitude requirements to control noise just to name a few efforts air tour operators are working to ensure they are responsible stewards of the nations parks and memorials. There are currently no restrictions or mitigation efforts for loud vehicles operating in Mount Rushmore, some of which make more noise than a passing helicopter.

Undoubtedly it is essential to preserve the National Parks and Memorials, yet still enable all forms of visitation so that all may enjoy. While I oppose the draft ATMP, commercial air tour operators would welcome collaborative engagement with the FAA, NPS, and all interested parties to benefit the memorial and the visitors.

Correspondence ID: 187Project:97377Document:128168

Name: Longetti, Alessandro

Received: Jun,15 2023 10:11:27

Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with [Name of Operator] and it was [please provide your experience and why you shouldnt be restricted from the experience].

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 188Project:97377Document:128168

Name: Lewis, Sherman

Received: Jun,15 2023 10:34:45

Correspondence Type: Web Form

Correspondence: I object to helicopter noise degrading my quality of life. So does my wife, our visitors, adn my neighbors. It is an abuse, a tort.

At a minimum they can tour the faces from Keystone.

The don't need to also overfly Old Baldy.

Correspondence ID: 189Project:97377Document:128168

Name: Yap, Kaili

Received: Jun,15 2023 13:04:44

Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with Blue Hawaiian Helicopters and it was so enriching to see Kauai from the air.

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 190Project:97377Document:128168
Name: Almskog, Darren
Received: Jun,15 2023 14:23:32
Correspondence Type: Web Form
Correspondence: I FULLY support the comments below!

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

I strenuously oppose the draft ATMP for Mount Rushmore National Memorial. I disagree with the elimination of Interim Operating Authority (IOA) and believe that the National Park Service (NPS) and the Federal Aviation Administration (FAA) failed to complete due diligence to determine the true impacts to the operators, the public, and the Memorials resources in the ATMP process.

According to the NPS documents, on average, from 2017-2019, 3,914 commercial air tours occurred over Mount Rushmore National Memorial Park every year. Under this draft ATMP, commercial air tours will be prohibited within the ATMP boundary of Mount Rushmore National Memorial Park.

The FAA and the NPS failed to reach out to the operators to determine the economic impacts from implementing a radical management plan that so severely restricts overflights. This plan will take \$45 million out of the local economy over 10 years and destroy local institutions that have been in operation since the 1960s.

As the NPS and the FAA have released the Draft Air Tour Management Plan (ATMP) it is very clear that the agencies have an agenda to eliminate the air tour industry. The real harm is not only to the air tour operators, but also to the National Memorial visitors. The ATMP is discriminatory against visitors who choose to experience the National Memorial by aerial sightseeing.

As we move past the pandemic years, many national parks and memorials saw their resources strained by the large number of visitors as the public began to travel again. Air tours are an important option for many visitors conducting a one-in-a-lifetime trip to see famous natural landmarks. Visitors taking advantage of air tours benefit by avoiding traffic, wait times, and walking trails that are inaccessible for the handicapped or elderly, while reducing congestion and demand on park infrastructure. Helicopters represent the single lowest impact form of visitation to our parks. Helicopters reduce traffic congestion, emissions, sound and all ground-based impacts. Nothing is taken from the park except for memories.

The national parks and memorials should be available for all visitors to see. Limiting flights over Mount Rushmore unfairly limits the elderly, very young, disabled, and others to experience the Memorial. Limiting flights over Mount Rushmore is discriminating to those who might not have the time, resources, or physical ability to see the memorial any other way.

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

By further restricting an already limited number of allowable air tours, we are reducing opportunities to access our parks and

memorials in a way that leaves little to no environmental footprint or disturbance. Through carbon-offset efforts and strict altitude requirements to control noise just to name a few efforts air tour operators are working to ensure they are responsible stewards of the nations parks and memorials. There are currently no restrictions or mitigation efforts for loud vehicles operating in Mount Rushmore, some of which make more noise than a passing helicopter.

Undoubtedly it is essential to preserve the National Parks and Memorials, yet still enable all forms of visitation so that all may enjoy. While I oppose the draft ATMP, commercial air tour operators would welcome collaborative engagement with the FAA, NPS, and all interested parties to benefit the memorial and the visitors.

Correspondence ID: 191Project:97377Document:128168
Name: Tremback, Savanna
Received: Jun,15 2023 20:59:59
Correspondence Type: Web Form
Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with Blue Hawaiian and it was awe inspiring, our pilot was more than informative about the history and the remarkable land on this Island. Ive lived here for 2 years and have been to Volcanoes NP five times. Seeing it from the sky was a view of the park that people should be able to experience.

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 192Project:97377Document:128168
Name: Schlueter, Austyn
Received: Jun,16 2023 07:54:28
Correspondence Type: Web Form
Correspondence: The local Lakota tribe members were not in opposition of tours around rushmore , the black hills , or badlands. The Local Native Americans support the air tourism to show everyone the beloved and sacred black hills. Helicopter tours are safe, fun, and enjoyable for all and should be allowed.

I strenuously oppose the draft ATMP for Mount Rushmore National Memorial. I disagree with the elimination of Interim Operating Authority (IOA) and believe that the National Park Service (NPS) and the Federal Aviation Administration (FAA) failed to complete due diligence to determine the true impacts to the operators, the public, and the Memorials resources in the ATMP process.

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The FAA and the NPS failed to reach out to the operators to determine the economic impacts from implementing a radical management plan that so severely restricts overflights. This plan will take \$45 million out of the local economy over 10 years and destroy local institutions that have been in operation since the 1960s.

As the NPS and the FAA have released the Draft Air Tour Management Plan (ATMP) it is very clear that the agencies have

an agenda to eliminate the air tour industry. The real harm is not only to the air tour operators, but also to the National Memorial visitors. The ATMP is discriminatory against visitors who choose to experience the National Memorial by aerial sightseeing.

As we move past the pandemic years, many national parks and memorials saw their resources strained by the large number of visitors as the public began to travel again. Air tours are an important option for many visitors conducting a one-in-a-lifetime trip to see famous natural landmarks. Visitors taking advantage of air tours benefit by avoiding traffic, wait times, and walking trails that are inaccessible for the handicapped or elderly, while reducing congestion and demand on park infrastructure. Helicopters represent the single lowest impact form of visitation to our parks. Helicopters reduce traffic congestion, emissions, sound and all ground-based impacts. Nothing is taken from the park except for memories.

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Undoubtedly it is essential to preserve the National Parks and Memorials, yet still enable all forms of visitation so that all may enjoy. While I oppose the draft ATMP, commercial air tour operators would welcome collaborative engagement with the FAA, NPS, and all interested parties to benefit the memorial and the visitors.

Correspondence ID: 193Project:97377Document:128168

Name: Goepfert, Christine

Received: Jun,16 2023 08:10:12

Correspondence Type: Web Form

Correspondence: National Park Service and Federation Aviation Administration

c/o Volpe National Transportation Systems Center

Kaitlyn Rimol, V-326

Attn: MORU/BADL ATMPs

55 Broadway

Cambridge, MA 02142

Re: Draft Air Tour Management Plan and Environmental Assessment for Mount Rushmore National Memorial and Badlands National Park

Dear NPS Director Sams and FAA Acting Administrator Trottenberg:

Since 1919, National Parks Conservation Association (NPCA) has been the leading voice of the American people in protecting and enhancing our National Park System. On behalf of our nearly 1.6 million members and supporters nationwide, we provide comments on the Draft Air Tour Management Plan (ATMP) and Environmental Assessment (EA) for Mount Rushmore National Memorial and Badlands National Park. We submit one letter in regard to both ATMP/EAs given the common analysis and outcomes in both.

The Draft ATMPs for Badlands and Mount Rushmore uphold legal mandates:

We support the agencies' decision to prohibit air tours in both park units in order to protect natural sounds, visitor experiences, Tribal sacred sites and ceremonial areas, natural and cultural resources, wildlife, and wilderness resources and values. We agree that commercial air tours: 1) result in unacceptable impacts to the aforementioned resources and people; and 2) do not support the management objectives of the parks.

We appreciate how clearly and accurately the National Air Tour Management Act of 2000 and implementing regulations are applied to both parks. See 49 USC §40128 and 14 CFR Part 136, Commercial Air Tours and National Parks Air Tour Management. These laws are intended to protect national parks, not promote commercial air tours. We agree with the ATMPs conclusions that air tours cause unacceptable impacts to park resources, visitors and Indigenous communities that utilize the parks.

Existing air tours are impairing park resources and conditions and thus are also contrary to the NPS Organic Act of 1916. NPS' mission as managers of national park sites is "to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations" (16 U.S.C. 1). The proposed ATMPs seek to carry out the mandates of the Organic Act because they ensure resources are conserved and remain unimpaired.

Draft ATMP protects park resources at Badlands National Park:

The ATMP covers the entire national park, both North and South Units, even though air tours have not been allowed in the South Unit.

Badlands National Park was first established in 1939 as a monument and then redesignated as a national park in 1978. The park was expanded in 1968 to include 133,000 acres, creating the South Unit of the park comprised of tribal lands, which are part of the Pine Ridge Reservation. Today the park is comprised of over 242,000 acres, 64,144 of which is designated wilderness. See South Unit General Management Plan, Executive Summary, page 3 (2012).

Based on the enabling legislation for the park and other governing laws, NPS documents note that Badlands is to be managed to accomplish the following: protect the unique landforms and scenery of the White River Badlands; preserve and interpret the history, culture and heritage of the Sioux Nation and Lakota peoples; provide for scientific research of the paleontological and geological resources; preserve the flora and fauna of the mixed grass prairie ecosystem; preserve the Badlands wilderness area; and interpret the archeological and contemporary history of settlement within the park. See Badlands GMPs, North (2005) and South Unit (2012) at 9-10 and 12, respectively.

For the following reasons, we support the Draft ATMP and Preferred Alternative in the Draft EA for Badlands:

- Importantly, the agencies used a specific baseline for natural sounds. The ATMP states, "The Park's ambient acoustic environment is very quiet, typically ranging between 22-27 decibels..." (page 4). This is a clear statement that preserving the sounds of nature is the predominant standard for judging whether Badlands is protected;
- Furthermore, when considering other flight paths, the ATMP emphatically refuses to redirect flights over congressionally designated wilderness. It states, "Eliminating air tour noise over designated Wilderness areas will help preserve Wilderness character and values associated with natural soundscapes such as solitude or primitive and unconfined recreation, including remoteness from sights and sounds; untrammeled or wildness; and naturalness" (page 5). Allowing commercial air tours in Wilderness is a non-starter;
- The ATMP highlights concerns about wildlife sensitive to noise including bighorn sheep and peregrine falcons. To ensure their continued survival, the ATMP essentially uses a precautionary principle to protect lambing season and general habitat; and
- The ATMP adheres to the serious concerns about commercial air tours from Northern Plains Tribes including the Oglala Lakota who co-manage the South Unit with the National Park Service. The plan states, "Tribes have articulated strong opposition to air tours over the Park because of their effects to the cultural landscape, wildlife, and plants, and concerns over privacy during traditional cultural practices and ceremonies within the ATMP boundary" (page 5). The sheer number of Tribes with connections to the park made it near impossible for the ATMP to suggest any mitigation that would respect the sacred lands.

Draft ATMP protects park resources at Mount Rushmore National Memorial:

Millions of people travel to South Dakota's beautiful Black Hills to learn about America's history in the shadow of Mount Rushmore's distinctive mountains amid sprawling pine forests. The Black Hills are known for its forested landscape, mostly wilderness with large granite outcrops and peaks. The lands are sacred to Northern Plains Tribal Nations, including the Lakota. Mount Rushmore and the Black Hills are sacred spaces for living cultures whose legacies still thrive today.

Many visit the park to see the sculpture of past Presidents carved into the mountain, seeking interpretative tours and learning opportunities. Part of the Memorial's purpose is to commemorate the founding and unification of the United States by preserving, protecting, and interpreting the mountain sculpture in its cultural and natural setting. Foundation Document: Mount Rushmore National Memorial at 5 (2015). Mount Rushmore is an internationally recognized symbol, representing the ideals of freedom and democracy.

For the following reasons, we support the Draft ATMP and Preferred Alternative in the Draft EA for Mount Rushmore:

- Interpretative programs are a key element to the visitor experience at Mt. Rushmore. Commercial air tours are noisy at levels that exceed the ability for people to carry on a conversation. The ATMP states, "The visitor experience at the Park has been severely impacted by air tour noise, which is contrary to the Park's purpose. These impacts are supported by modeling results and verbal complaints received by Park staff" (page 4);
- Noise has a direct negative impact on wildlife species in the park unit. In particular, the ATMP states, "...the state listed threatened peregrine falcon, which is highly susceptible to noise disturbance. A peregrine pair nested at the Park in 2020 and had four chicks, none of which survived. Stressors such as air tour noise could impact recovery of this struggling population" (page 4). The ATMP must use the precautionary principle to ensure wildlife have the conditions and habitat to thrive; and
- The ATMP adheres to the serious concerns about commercial air tours from Northern Plains Tribes. It states, "...the Tribes have repeatedly stated that they are against all air tours in the areas they hold sacred, including over the Park... Tribes consider the entire landscape of the Black Hills to be sacred and believe air tours are inappropriate and constitute an adverse effect to the cultural landscape, wildlife and plants" (page 4). The sheer number of Tribes with connections to the park made it near impossible for the ATMP to suggest any mitigation that would respect the sacred lands.

Conclusion:

NPCA is supportive of the fact the ATMPs clearly state a prohibition on new entrant operators that may want to conduct commercial air tours in the future (Draft ATMPs at 6.0). To sustain the protection and preservation of Badlands National Park and Mount Rushmore, it is critical the agencies do not intend to allow commercial air tours in the future.

We do understand commercial air tours will likely continue outside the ATMP boundaries for both park units. The National Park Service Management Policies provide guidance for park managers when an activity outside park boundaries impacts park resources and values. See NPS Management Policies 2006 at Section 1.6 (pp. 13-14). We strongly recommend the agencies engage and consult with other jurisdictions to urge protection for natural and cultural resources that affect the parks.

Thank you.

Christine Goepfert
Midwest Acting Regional Director
National Parks Conservation Association

Correspondence ID: 194Project:97377Document:128168

Name: Larimer, Kayne

Received: Jun,16 2023 08:23:52

Correspondence Type: Web Form

Correspondence: I support limiting the numbers and routes of helicopter traffic in the Mt Rushmore area and surrounding BE wilderness. Its a stress on wildlife and interferes with the wilderness experience. Thank you.

Correspondence ID: 195Project:97377Document:128168
Name: Maldonado, Aldo
Received: Jun,16 2023 08:39:34
Correspondence Type: Web Form
Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I strenuously oppose the draft ATMP for Mount Rushmore National Memorial. I disagree with the elimination of Interim Operating Authority (IOA) and believe that the National Park Service (NPS) and the Federal Aviation Administration (FAA) failed to complete due diligence to determine the true impacts to the operators, the public, and the Memorials resources in the ATMP process.

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The FAA and the NPS failed to reach out to the operators to determine the economic impacts from implementing a radical management plan that so severely restricts overflights. This plan will take \$45 million out of the local economy over 10 years and destroy local institutions that have been in operation since the 1960s.

As the NPS and the FAA have released the Draft Air Tour Management Plan (ATMP) it is very clear that the agencies have an agenda to eliminate the air tour industry. The real harm is not only to the air tour operators, but also to the National Memorial visitors. The ATMP is discriminatory against visitors who choose to experience the National Memorial by aerial sightseeing.

As we move past the pandemic years, many national parks and memorials saw their resources strained by the large number of visitors as the public began to travel again. Air tours are an important option for many visitors conducting a one-in-a-lifetime trip to see famous natural landmarks. Visitors taking advantage of air tours benefit by avoiding traffic, wait times, and walking trails that are inaccessible for the handicapped or elderly, while reducing congestion and demand on park infrastructure. Helicopters represent the single lowest impact form of visitation to our parks. Helicopters reduce traffic congestion, emissions, sound and all ground-based impacts. Nothing is taken from the park except for memories.

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Undoubtedly it is essential to preserve the National Parks and Memorials, yet still enable all forms of visitation so that all may enjoy. While I oppose the draft ATMP, commercial air tour operators would welcome collaborative engagement with the FAA, NPS, and all interested parties to benefit the memorial and the visitors.

Correspondence ID: 196Project:97377Document:128168
Name: Brantner, Mathew
Received: Jun,16 2023 09:11:05

Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 197Project:97377Document:128168

Name: Lopez, Casandra

Received: Jun,16 2023 10:57:52

Correspondence Type: Web Form

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

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By further restricting an already limited number of allowable air tours, we are reducing opportunities to access our parks and memorials in a way that leaves little to no environmental footprint or disturbance. Through carbon-offset efforts and strict

altitude requirements to control noise just to name a few efforts air tour operators are working to ensure they are responsible stewards of the nations parks and memorials. There are currently no restrictions or mitigation efforts for loud vehicles operating in Mount Rushmore, some of which make more noise than a passing helicopter.

Undoubtedly it is essential to preserve the National Parks and Memorials, yet still enable all forms of visitation so that all may enjoy. While I oppose the draft ATMP, commercial air tour operators would welcome collaborative engagement with the FAA, NPS, and all interested parties to benefit the memorial and the visitors.

Correspondence ID: 198Project:97377Document:128168
Name: robinson, derrick
Received: Jun,16 2023 12:25:35
Correspondence Type: Web Form
Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with [Name of Operator] and it was [please provide your experience and why you shouldnt be restricted from the experience].

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 199Project:97377Document:128168
Name: Robinson, Mekhi
Received: Jun,16 2023 12:25:36
Correspondence Type: Web Form
Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

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I had the opportunity to experience an air tour with [Name of Operator] and it was [please provide your experience and why you shouldnt be restricted from the experience].

The National Parks should be available for all visitors to see and experience. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 200Project:97377Document:128168
Name: Foster, Janie
Received: Jun,16 2023 13:34:13
Correspondence Type: Web Form
Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

My first helicopter tour 21 years ago was a life-changing experience! I will never forget it!

I strenuously oppose the draft ATMP for Mount Rushmore National Memorial. I disagree with the elimination of Interim

Operating Authority (IOA) and believe that the National Park Service (NPS) and the Federal Aviation Administration (FAA) failed to complete due diligence to determine the true impacts to the operators, the public, and the Memorials resources in the ATMP process.

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Correspondence ID: 201Project:97377Document:128168

Name: McLain, Sandra K

Received: Jun,16 2023 13:55:25

Correspondence Type: Web Form

Correspondence: I truely believe that extending the airspace ban/federal placement into Keystone is an over-reach of government and should not be done for any reason. It is private space owned by individuals and not federal property! This is totally, unethical, illegal and doing something that should never be touched. Really? Because of loud nnoises it hurts the animals ears? First of all Iam on the Town Board in Keystone, this move is beyond legislation and will be fought legally. First of all we make our money through sales tax, this would reduce sales tax why should that be done in a municipality. I am sorry that the Natives Land was taken away, we address that in our tour at Big Thunder Gold Mine. We do not have to pay for mistakes other people have done. We bought this property and should not be limited as to what can be done, That

removes our rights and violates private ownership and the right to protection. This would impact life flights to land and take away the availability to save those lives. This is only a sneaky way to do something without notification. You are to talk to each municipality and that did not happen in Keystone. This actuation communication went to our maintenance supervisor, not the Town Board President of our municipality of Keystone. That is not communication that is a mailing. He could have thrown it away or it could have been lost. I am an American Citizen and have the right to express my feeling on a topic as a citizen. if this passes and slips through the cracks, you as employees of the American Government have not done your duty. Any business owner would not vote for this. Stay within your own boundaries and control those parameters not ours especially when that communication was not prepared accurately. I represent the people and our businesses for the best that Keystone can be. This proposal is stepping over your boundaries. I tried to get to this proposal through the normal means and it No this is a violation of our rights and ownership. Do nnot approve or move this forward. Sandra McLain

Correspondence ID: 202Project:97377Document:128168
Name: Hilario, Luis
Received: Jun,16 2023 14:05:31
Correspondence Type: Web Form
Correspondence: The flying tour gives tourists and visitors a different aspect to view the national park and national landmarks. This is a vital to keep tourists to keep coming and enjoying what nature has to offer.

Correspondence ID: 203Project:97377Document:128168
Name: Goree, Katy
Received: Jun,16 2023 14:28:54
Correspondence Type: Web Form
Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with Maui Maverick and it was an incredible experience seeing areas of Maui that my elderly parents wouldnt have been able to see otherwise.

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 204Project:97377Document:128168
Name: Binder, Chad
Received: Jun,16 2023 15:18:40
Correspondence Type: Web Form
Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with Blue Hawaiian Helicopters and it was a great experience !

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 205Project:97377Document:128168

Name: Kotrys, Laurine
Received: Jun,16 2023 15:47:57
Correspondence Type: Web Form

Correspondence: National Parks should be available for all visitors to see whether it be by land tours or by air tours. Air tours would be an easier option for those who can't do land tours for health reasons (lots of walking, difficult terrain and/or outdoor heat. Aerial tours also would help lessen the amount of people actually going to these parks and disturbing the environment.

Correspondence ID: 206Project:97377Document:128168

Name: Rocco, David
Received: Jun,16 2023 15:49:19
Correspondence Type: Web Form

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

Aside from the comments below, I would suggest that both parties look into the agreement that was agreed upon by the FAA, the NYC area based helicopter company FLYNYON and the citizens of Manhattan, NY. An agreement that could easily be duplicated for this situation.

I strenuously oppose the draft ATMP for Mount Rushmore National Memorial. I disagree with the elimination of Interim Operating Authority (IOA) and believe that the National Park Service (NPS) and the Federal Aviation Administration (FAA) failed to complete due diligence to determine the true impacts to the operators, the public, and the Memorials resources in the ATMP process.

According to the NPS documents, on average, from 2017-2019, 3,914 commercial air tours occurred over Mount Rushmore National Memorial Park every year. Under this draft ATMP, commercial air tours will be prohibited within the ATMP boundary of Mount Rushmore National Memorial Park.

The FAA and the NPS failed to reach out to the operators to determine the economic impacts from implementing a radical management plan that so severely restricts overflights. This plan will take \$45 million out of the local economy over 10 years and destroy local institutions that have been in operation since the 1960s.

As the NPS and the FAA have released the Draft Air Tour Management Plan (ATMP) it is very clear that the agencies have an agenda to eliminate the air tour industry. The real harm is not only to the air tour operators, but also to the National Memorial visitors. The ATMP is discriminatory against visitors who choose to experience the National Memorial by aerial sightseeing.

As we move past the pandemic years, many national parks and memorials saw their resources strained by the large number of visitors as the public began to travel again. Air tours are an important option for many visitors conducting a one-in-a-lifetime trip to see famous natural landmarks. Visitors taking advantage of air tours benefit by avoiding traffic, wait times, and walking trails that are inaccessible for the handicapped or elderly, while reducing congestion and demand on park infrastructure. Helicopters represent the single lowest impact form of visitation to our parks. Helicopters reduce traffic congestion, emissions, sound and all ground-based impacts. Nothing is taken from the park except for memories.

The national parks and memorials should be available for all visitors to see. Limiting flights over Mount Rushmore unfairly limits the elderly, very young, disabled, and others to experience the Memorial. Limiting flights over Mount Rushmore is discriminating to those who might not have the time, resources, or physical ability to see the memorial any other way.

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

By further restricting an already limited number of allowable air tours, we are reducing opportunities to access our parks and

memorials in a way that leaves little to no environmental footprint or disturbance. Through carbon-offset efforts and strict altitude requirements to control noise just to name a few efforts air tour operators are working to ensure they are responsible stewards of the nations parks and memorials. There are currently no restrictions or mitigation efforts for loud vehicles operating in Mount Rushmore, some of which make more noise than a passing helicopter.

Undoubtedly it is essential to preserve the National Parks and Memorials, yet still enable all forms of visitation so that all may enjoy. While I oppose the draft ATMP, commercial air tour operators would welcome collaborative engagement with the FAA, NPS, and all interested parties to benefit the memorial and the visitors.

Correspondence ID: 207Project:97377Document:128168
Name: Nykaza, Sharon
Received: Jun,16 2023 16:29:26
Correspondence Type: Web Form
Correspondence: Please keep this option available to all

I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with [Name of Operator] and it was [please provide your experience and why you shouldnt be restricted from the experience].

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Thank you.

Correspondence ID: 208Project:97377Document:128168
Name: Santella, Robert
Received: Jun,16 2023 17:05:13
Correspondence Type: Web Form
Correspondence: Please limit helicopters as much as possible around Mt Rushmore and the Black Hills. Helicopter noise is very annoying and significantly disrupts the experience whether hiking in the Black Hills or visiting Mt. Rushmore. I would advocate banning them entirely.

Correspondence ID: 209Project:97377Document:128168
Name: Broom, Sonja
Received: Jun,16 2023 17:21:23
Correspondence Type: Web Form
Correspondence: Dear Deciding Parties,

How is it ok for individuals with disposable income to fly, or be flown, but it's NOT okay for honest citizens to make a living by showing others without the means, the natural beauty from the air?

I'm sure there are plenty of regulations to address safety concerns as well as any environmental concerns. Have the operators been invited to a negotiation type meeting?

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

I strenuously oppose the draft ATMP for Mount Rushmore National Memorial. I disagree with the elimination of Interim Operating Authority (IOA) and believe that the National Park Service (NPS) and the Federal Aviation Administration (FAA) failed to complete due diligence to determine the true impacts to the operators, the public, and the Memorials resources in the ATMP process.

According to the NPS documents, on average, from 2017-2019, 3,914 commercial air tours occurred over Mount Rushmore National Memorial Park every year. Under this draft ATMP, commercial air tours will be prohibited within the ATMP boundary of Mount Rushmore National Memorial Park.

The FAA and the NPS failed to reach out to the operators to determine the economic impacts from implementing a radical management plan that so severely restricts overflights. This plan will take \$45 million out of the local economy over 10 years and destroy local institutions that have been in operation since the 1960s.

As the NPS and the FAA have released the Draft Air Tour Management Plan (ATMP) it is very clear that the agencies have an agenda to eliminate the air tour industry. The real harm is not only to the air tour operators, but also to the National Memorial visitors. The ATMP is discriminatory against visitors who choose to experience the National Memorial by aerial sightseeing.

As we move past the pandemic years, many national parks and memorials saw their resources strained by the large number of visitors as the public began to travel again. Air tours are an important option for many visitors conducting a one-in-a-lifetime trip to see famous natural landmarks. Visitors taking advantage of air tours benefit by avoiding traffic, wait times, and walking trails that are inaccessible for the handicapped or elderly, while reducing congestion and demand on park infrastructure. Helicopters represent the single lowest impact form of visitation to our parks. Helicopters reduce traffic congestion, emissions, sound and all ground-based impacts. Nothing is taken from the park except for memories.

The national parks and memorials should be available for all visitors to see. Limiting flights over Mount Rushmore unfairly limits the elderly, very young, disabled, and others to experience the Memorial. Limiting flights over Mount Rushmore is discriminating to those who might not have the time, resources, or physical ability to see the memorial any other way.

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

By further restricting an already limited number of allowable air tours, we are reducing opportunities to access our parks and memorials in a way that leaves little to no environmental footprint or disturbance. Through carbon-offset efforts and strict altitude requirements to control noise just to name a few efforts air tour operators are working to ensure they are responsible stewards of the nations parks and memorials. There are currently no restrictions or mitigation efforts for loud vehicles operating in Mount Rushmore, some of which make more noise than a passing helicopter.

Undoubtedly it is essential to preserve the National Parks and Memorials, yet still enable all forms of visitation so that all may enjoy. While I oppose the draft ATMP, commercial air tour operators would welcome collaborative engagement with the FAA, NPS, and all interested parties to benefit the memorial and the visitors.

Correspondence ID: 210Project:97377Document:128168

Name: Johnson, Tammie

Received: Jun,16 2023 18:18:49

Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

We wouldve loved to see more of your beautiful island.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with [Name of Operator] and it was [please provide your experience and why you shouldn't be restricted from the experience].

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nation's national parks.

Correspondence ID: 211Project:97377Document:128168
Name: Jawor, Julia
Received: Jun,16 2023 21:01:56
Correspondence Type: Web Form
Correspondence: I am writing to express my opposition to the draft ATMP for Mount Rushmore National Memorial.

I disagree with the elimination of Interim Operating Authority (IOA) and believe that the National Park Service (NPS) and the Federal Aviation Administration (FAA) failed to complete due diligence to determine the true impacts to the operators, the public, and the Memorials resources in the ATMP process.

According to the NPS documents, on average, from 2017-2019, 3,914 commercial air tours occurred over Mount Rushmore National Memorial Park every year. Under this draft ATMP, commercial air tours will be prohibited within the ATMP boundary of Mount Rushmore National Memorial Park.

The FAA and the NPS failed to reach out to the operators to determine the economic impacts from implementing a radical management plan that so severely restricts overflights. This plan will take \$45 million out of the local economy over 10 years and destroy local institutions that have been in operation since the 1960s.

As the NPS and the FAA have released the Draft Air Tour Management Plan (ATMP) it is very clear that the agencies have an agenda to eliminate the air tour industry. The real harm is not only to the air tour operators, but also to the National Memorial visitors. The ATMP is discriminatory against visitors who choose to experience the National Memorial by aerial sightseeing.

As we move past the pandemic years, many national parks and memorials saw their resources strained by the large number of visitors as the public began to travel again. Air tours are an important option for many visitors conducting a one-in-a-lifetime trip to see famous natural landmarks. Visitors taking advantage of air tours benefit by avoiding traffic, wait times, and walking trails that are inaccessible for the handicapped or elderly, while reducing congestion and demand on park infrastructure. Helicopters represent the single lowest impact form of visitation to our parks. Helicopters reduce traffic congestion, emissions, sound and all ground-based impacts. Nothing is taken from the park except for memories.

The national parks and memorials should be available for all visitors to see. Limiting flights over Mount Rushmore unfairly limits the elderly, very young, disabled, and others to experience the Memorial. Limiting flights over Mount Rushmore is discriminating to those who might not have the time, resources, or physical ability to see the memorial any other way.

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

By further restricting an already limited number of allowable air tours, we are reducing opportunities to access our parks and memorials in a way that leaves little to no environmental footprint or disturbance. Through carbon-offset efforts and strict altitude requirements to control noise just to name a few efforts air tour operators are working to ensure they are responsible stewards of the nation's parks and memorials. There are currently no restrictions or mitigation efforts for loud vehicles operating in Mount Rushmore, some of which make more noise than a passing helicopter.

Undoubtedly it is essential to preserve the National Parks and Memorials, yet still enable all forms of visitation so that all may enjoy. While I oppose the draft ATMP, commercial air tour operators would welcome collaborative engagement with the FAA, NPS, and all interested parties to benefit the memorial and the visitors.

Correspondence ID: 212Project:97377Document:128168

Name: wilcoxon, Jesse

Received: Jun,16 2023 21:22:12

Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with Tim and it was amazing and one of the only ways my mom would have been able to see it because of her inability to hike much.

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 213Project:97377Document:128168

Name: Van Dyke, Pam

Received: Jun,17 2023 05:51:32

Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with Blue Hawaiian and it was a wonderful way to see the entire island, the majesty of the volcanos from a perspective I could not have from the ground with a knowledgeable pilot. We were able to see the volcano top that day because there was no cloud cover. These experiences should not become limited or restricted because access to this natural wonder should be seen by all. Disabled individuals would never be able to have such an experience.

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 214Project:97377Document:128168

Name: Hard, Denise

Received: Jun,17 2023 09:15:07

Correspondence Type: Web Form

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

I strenuously oppose the draft ATMP for Mount Rushmore National Memorial. I disagree with the elimination of Interim Operating Authority (IOA) and believe that the National Park Service (NPS) and the Federal Aviation Administration (FAA) failed to complete due diligence to determine the true impacts to the operators, the public, and the Memorials resources in the

ATMP process.

According to the NPS documents, on average, from 2017-2019, 3,914 commercial air tours occurred over Mount Rushmore National Memorial Park every year. Under this draft ATMP, commercial air tours will be prohibited within the ATMP boundary of Mount Rushmore National Memorial Park.

The FAA and the NPS failed to reach out to the operators to determine the economic impacts from implementing a radical management plan that so severely restricts overflights. This plan will take \$45 million out of the local economy over 10 years and destroy local institutions that have been in operation since the 1960s.

As the NPS and the FAA have released the Draft Air Tour Management Plan (ATMP) it is very clear that the agencies have an agenda to eliminate the air tour industry. The real harm is not only to the air tour operators, but also to the National Memorial visitors. The ATMP is discriminatory against visitors who choose to experience the National Memorial by aerial sightseeing.

As we move past the pandemic years, many national parks and memorials saw their resources strained by the large number of visitors as the public began to travel again. Air tours are an important option for many visitors conducting a one-in-a-lifetime trip to see famous natural landmarks. Visitors taking advantage of air tours benefit by avoiding traffic, wait times, and walking trails that are inaccessible for the handicapped or elderly, while reducing congestion and demand on park infrastructure. Helicopters represent the single lowest impact form of visitation to our parks. Helicopters reduce traffic congestion, emissions, sound and all ground-based impacts. Nothing is taken from the park except for memories.

The national parks and memorials should be available for all visitors to see. Limiting flights over Mount Rushmore unfairly limits the elderly, very young, disabled, and others to experience the Memorial. Limiting flights over Mount Rushmore is discriminating to those who might not have the time, resources, or physical ability to see the memorial any other way.

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

By further restricting an already limited number of allowable air tours, we are reducing opportunities to access our parks and memorials in a way that leaves little to no environmental footprint or disturbance. Through carbon-offset efforts and strict altitude requirements to control noise just to name a few efforts air tour operators are working to ensure they are responsible stewards of the nations parks and memorials. There are currently no restrictions or mitigation efforts for loud vehicles operating in Mount Rushmore, some of which make more noise than a passing helicopter.

Undoubtedly it is essential to preserve the National Parks and Memorials, yet still enable all forms of visitation so that all may enjoy. While I oppose the draft ATMP, commercial air tour operators would welcome collaborative engagement with the FAA, NPS, and all interested parties to benefit the memorial and the visitors.

My sons are disabled and this would be the only way they can enjoy the national parks.

Correspondence ID: 215Project:97377Document:128168

Name: Harris, Robert

Received: Jun,17 2023 10:56:27

Correspondence Type: Web Form

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

I strenuously oppose the draft ATMP for Mount Rushmore National Memorial. I disagree with the elimination of Interim Operating Authority (IOA) and believe that the National Park Service (NPS) and the Federal Aviation Administration (FAA) failed to complete due diligence to determine the true impacts to the operators, the public, and the Memorials resources in the ATMP process.

According to the NPS documents, on average, from 2017-2019, 3,914 commercial air tours occurred over Mount Rushmore National Memorial Park every year. Under this draft ATMP, commercial air tours will be prohibited within the ATMP boundary of Mount Rushmore National Memorial Park.

The FAA and the NPS failed to reach out to the operators to determine the economic impacts from implementing a radical management plan that so severely restricts overflights. This plan will take \$45 million out of the local economy over 10 years and destroy local institutions that have been in operation since the 1960s.

As the NPS and the FAA have released the Draft Air Tour Management Plan (ATMP) it is very clear that the agencies have an agenda to eliminate the air tour industry. The real harm is not only to the air tour operators, but also to the National Memorial visitors. The ATMP is discriminatory against visitors who choose to experience the National Memorial by aerial sightseeing.

As we move past the pandemic years, many national parks and memorials saw their resources strained by the large number of visitors as the public began to travel again. Air tours are an important option for many visitors conducting a one-in-a-lifetime trip to see famous natural landmarks. Visitors taking advantage of air tours benefit by avoiding traffic, wait times, and walking trails that are inaccessible for the handicapped or elderly, while reducing congestion and demand on park infrastructure. Helicopters represent the single lowest impact form of visitation to our parks. Helicopters reduce traffic congestion, emissions, sound and all ground-based impacts. Nothing is taken from the park except for memories.

The national parks and memorials should be available for all visitors to see. Limiting flights over Mount Rushmore unfairly limits the elderly, very young, disabled, and others to experience the Memorial. Limiting flights over Mount Rushmore is discriminating to those who might not have the time, resources, or physical ability to see the memorial any other way.

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

By further restricting an already limited number of allowable air tours, we are reducing opportunities to access our parks and memorials in a way that leaves little to no environmental footprint or disturbance. Through carbon-offset efforts and strict altitude requirements to control noise just to name a few efforts air tour operators are working to ensure they are responsible stewards of the nations parks and memorials. There are currently no restrictions or mitigation efforts for loud vehicles operating in Mount Rushmore, some of which make more noise than a passing helicopter.

Undoubtedly it is essential to preserve the National Parks and Memorials, yet still enable all forms of visitation so that all may enjoy. While I oppose the draft ATMP, commercial air tour operators would welcome collaborative engagement with the FAA, NPS, and all interested parties to benefit the memorial and the visitors.

Correspondence ID: 216Project:97377Document:128168
Name: Hodapp, Steve
Received: Jun,17 2023
Correspondence Type: Other
Correspondence: Volpe National Transportation Systems Center
Kaitlyn Rimol, V-326
Attn: Mount Rushmore National memorial ATMP
55 Broadway
Cambridge, MA 02142

Re: commercial air tours over Mt. Rushmore and area

I am a frequent visitor to the South Dakota Black Hills. I have been visiting there for
Over those years I have noticed an increase in the disturbance caused by helicopter tours in

calm and serenity of the area. It's the calm and serenity which had been a major draw. I would be in favor of fewer helicopter tours either in number or in more limited ho operation. Total elimination would be fine with me. I understand the tour operators' argument about some special populations accessin tours. But those populations could enjoy the area through other means, like simply driving area or accessing ground-based tour operators.

Thank you

Steve Hodapp
PO Box 34272
Omaha, NE 68134

Correspondence ID: 217Project:97377Document:128168
Name: Hoff, Baylee
Received: Jun,17 2023
Correspondence Type: Other
Correspondence: Kaitlyn Rimol
Vole National Transportation Systems Center
55 Broadway
Cambridge, MA, 02142

Subject:

Environmental Review - Mount Rushmore National Monument ATMP.

Dear Ms. Rimol:

The South Dakota Department of Agriculture and Natural Resources (DAN) has reviewed the above-referenced project for potential impacts to natural resources. Based on the information submitted in your e-mail dated May 16, 2023, DAN has the following comments and permitting requirements.

Air Quality

Based on the information provided, it appears this project will have minor impacts to air quality in South Dakota. This impact would be through source and fugitive emissions. In many cases, an air quality permit is required to operate equipment with point source emissions. A permit application can be obtained from the Air Quality or Minerals and Mining Program. Fugitive emissions, although not covered under State air quality regulations, are a common source of public concern and may be subject to local or county ordinances. Please contact your local officials to discuss requirements regarding fugitive emissions.

For further air quality information, please contact Rick Boddicker, Air Quality Program, telephone number 605-773-3151

Drinking Water

Based on the information provided, this project will not have adverse environmental effects to drinking water in this area. Should the parameters of your project change please reach out to Mark Mayer at 605-773-6039 or Mark.Mayer@state.sd.us

Forestry and Wildlife

Resource Conservation & Forestry and the Department of Game, Fish and Parks have reviewed the draft environmental assessment for the Mt. Rushmore Air Travel Management Plan. Based on the information provided, we respectfully submit the following comments:

We thank you for taking our previous comments into consideration and appreciate them being incorporated into the Draft Environmental Assessment.

Tanks and Spills

The Inspection, Compliance, and Remediation Program (ICRP) maintains a database of registered storage tanks and spills/environmental events, including petroleum and chemical releases in South Dakota. Our records show two known spills/environmental events and two registered storage tank facilities near the area. We have compiled this information in the attached table. For more information about currently known tanks and spills/environmental events (including pdf copies of case files), please visit:

<https://apps.sd.gov/nr42interactivemap>.

Please be advised any licensed aircraft operator with fuel storage may be subject to the state's storage tank regulations. Operators must contact the DAN Storage tank Section to determine requirements for their tanks. Further, if any operator licensed to perform tours encounters or causes a hazardous materials release, it must immediately be reported to DAN at 605-773-3296 (or 605-773-3231 after hours). DAN will determine the party most responsible for the release and will require that party or the tank owner to perform cleanup work. If you have questions, please contact Baylee Hoff at baylee.hoff@state.sd.us or (605) 773-3296.

Thank you for providing DAN the opportunity to comment on this project. If you have any questions regarding the information provided, please contact me at 605-773-3296.

Sincerely, Mausio Peterson

FOr

Baylee Hoff

Environmental Scientist

SD DAN- Environmental Assessment Contact

Phone: (605) 773-3296

Email: Baylee.Hoff@state.sd.us

cc/e: Dustin Willett, Pennington County Emergency Manager

dustin.willett@pennco.org

Kaitlyn Rimol

617-494-3648

Kaitlyn.Rimol@dot.gov

Correspondence ID:	218Project:97377Document:128168
Name:	Anonymous, Anonymous
Received:	Jun,17 2023
Correspondence Type:	Other

Correspondence: 6/2/23

I am not an air tour operator and do not intend to enter this activity. However, as a commercial pilot with almost 50 years experience flying over and around national park units including 20 years as a USDOJ pilot/aviation manager, and over three decades experience in managing public lands, I believe that I am reasonably qualified to comment on the draft Mount Rushmore National Memorial Air Tour Management Plan. As presented I believe the plan and accompanying environmental assessment is flawed and I recommend that it be revised. In no particular order of importance I suggest the following points should be addressed:

With the exception of Rocky Mountain National Park Congress has consistently denied NPS requests to prohibit commercial air tour operations over national park units. The legislative history of 14CFR 136 clearly indicates Congressional desire for the NPS to manage, not eliminate this commercial activity except in the most compelling circumstances. The Mount Rushmore National Memorial ATMP while technically not prohibiting commercial air tours effectively does so, unreasonably denying an entire class of park visitors the opportunity to experience their National Memorial. As with all forms of park visitation aerial visitation is not an unrestricted right but the NPS should give greater weight to adequately providing for the opportunity along with the other forms of visitor use more favored by the NPS, through constructive management rather than effectively prohibiting it. I recommend that the NPS give more consideration to managing this form of visitation rather than eliminating it.

The NPS notes the US Forest Service Wilderness on the southwest boundary, land which the NPS is not responsible for managing or protecting, as a key element in establishing the 5000'agl flight restriction in the 1/2 mile buffer area. The NPS provides no information as to the level of use of this portion of the wilderness area. The cost/benefit of effectively prohibiting approximately 15,000+ park visitors (the NPS estimate of around 19,000 commercial air tour passengers annually is likely too high since not all seats are filled on every flight) from experiencing their National Memorial relative to what may be a very small number of users in this portion of the USFS wilderness should be evaluated in the environmental assessment. I am not dismissing the need to consider the important value of the wilderness experience to those seeking it but rather point out that using the adjacent USFS wilderness as the rationale to effectively eliminate the National Memorial experience for a large number of park visitors may not be reasonable. I recommend actual visitation figures for this portion of the wilderness be included allowing for an understanding of the actual impact magnitude.

The NPS states there is widespread tribal opposition to all overflights anywhere, anytime, based on the sacred nature of the surrounding Black Hills to the indigenous peoples. Without question this should receive serious consideration and the law requires consultation which the park appears to have properly done. However, the law does not require that the rights of these park visitors to enjoy their National Memorial must be completely subjugated to the tribal desires. If we take the NPS' apparent face value acceptance of this claim then all development within the Black Hills, including the park and most tribal structures must be removed and the Black Hills closed off to all except tribal residents; this clearly is impractical and unacceptable to the American public. However, there is no reason that key sites within the the current level of daily commercial air tour flights achieving even greater mitigation without total elimination of this form of park visitation. I recommend the plan clearly state why the NPS did not consider these tools buffer zone, as well as inside the park boundary, cannot be protected by improved air tour route management and air tour use windows. I recommend the cost/benefit of effectively eliminating an entire class of park visitors from experiencing their National Memorial relative to tribal concerns be addressed in the environmental assessment.

The environmental assessment estimates the overall financial impact to the county for alternatives #2, #3, and #4 to be minor although no dollar figures are provided. The concept of minor economic impact as viewed by government officials is often quite different than it is to those whose living is being impacted.

The environmental assessment states that the affected air tour operators should simply change their business model and replace lost air tour revenue with other flight operations. The aviation industry is not such that operators merely flip a switch and change services offered with little or no economic harm. The NPS assertion here is cavalier and does not honestly reflect the economic realities this plan presents to the existing commercial air tour operators. I recommend that the economic impacts discussion include actual dollar figures for the impacts of each alternative upon the current operators. The NPS provides no justification for the proposed 5000'agl limit for commercial air tour operations

14CFR 91.136.33 defines air tour operations below 5000° agl as commercial air tours, indicating that they are therefore subject to NPS/FAA management, but this is not the same as saying operations below this altitude are to be effectively prohibited as this plan proposes. To my knowledge there is no aviation noise related research identifying 5000° agl as a minimum threshold for noise abatement and it is 2.5 times the FAA's recommended mitigation altitude for overflights of sensitive areas, per Advisory Circular 91-36D.

Absent further NPS justification the 5000°agl altitude is unreasonable and excessive for the attainment of the Agency's noise management goals. Rather, it appears to have been proposed solely to make commercial air tours operationally and economically impractical due to aircraft performance limitations, especially on a warm summer day, and by making the visitor's experience to the National Memorial unsatisfactory. The 5000°agl limitation would also preclude many summer flying days with legal visual flight rule weather (VFR) but where a higher ceiling would be necessary for the fixed wing operator to comply with FAA minimum safe altitude and cloud clearance requirements. I recommend that the park cite responsible scientific basis supporting the 5000°agl limitation in lieu of the FAA's 2000' agl recommendation. The NPS estimates that what it views as adverse noise impacts (>52dB) from air tour operations under alternatives #3 and #4 would be between approximately 32 and about 60 minutes per day. Given the adverse noise impacts from surface based visitation, which the NPS briefly notes exist but fails to quantify, occur for 12-15 hours per summer day, it is unreasonable to single out only commercial air tour visitation for mitigation via what is effectively elimination. The NPS provides no data supporting the inference that significant numbers of Mount Rushmore NM surface visitors are adversely impacted by these relatively brief periods of noise. There is not even inference that the NPS has properly surveyed this affected population to determine what the level of experience impairment may be. I recommend the NPS provide specific survey data showing the level of surface visitor dissatisfaction associated with commercial air tour generated noise.

Alternatives #3 and #4 evaluate mitigation by reducing the number of allowed commercial air tours, and are rejected in total by the NPS. However the NPS does not appear to have considered route adjustments), a common mitigation tool utilized by other parks in achieving the goals of 14CFR 136.37 and 14CFR 136.39, as a tool to provide adequate noise mitigation for the visitors on the ground while still providing these aerial park visitors with a satisfactory park experience. The key consideration would be horizontal adjustments but still within reasonable viewing range of the park's key features. The NPS also appears to have not considered more reasonable vertical adjustments (see above comment) only proposing 5000°agl or nothing. This could be a standalone alternative or combined with a reasonable reduction over

The NPS proposes the same level of restriction upon the current fixed wing operator as for the current helicopter operator even though generated noise levels, the number of operations, and the subsequent impacts to the park are significantly different. The NPS needs to provide the basis for this comingling of restriction. I recommend the plan analyze fixed wing and rotary wing operations separately.

The NPS fails to consider the positive aspect of park visits via commercial air tour. The aircraft noise issue is sometimes adverse and should receive appropriate mitigation. However, the NPS has not identified the additional and adverse surface development, along with increased protection, interpretation, and maintenance costs which would be necessary to support the additional 15,000+ surface visitors who now experience the National Memorial via air and require no PS infrastructure support. I recommend these issues be identified and properly evaluated in the environmental assessment.

The NPS briefly raises the issue that aircraft overflights create a visual impairment and therefore diminish the surface visitor's experience at the National Memorial. FAA and PS data confirms a small portion of the population finds viewing aircraft an adverse experience, especially in a backcountry or wilderness setting. The numbers drop significantly when applied to more developed settings such as is the case around the national Memorial's primary resource. Many visitors note their experience is diminished by seeing large numbers of tour busses or camper trailers, as well as other forms of surface transportation all well tolerated and accommodated by the NPS. Applying the NPS' logic against commercial air tours shouldn't these forms of transportation also be mitigated from existence as well? This is obviously impractical and contrary to the NPS mandate (admittedly conflicting with the preservation mandate) to provide for the public enjoyment of the parks under its care. I recommend this plan approach commercial air tour management from the same concept of proper accommodation that the NPS provides to other forms of visitor transportation

Kait Rimol (she/her)

Physical Scientist / Environmental Science and Engineering Division, V-326

Correspondence ID: 219Project:97377Document:128168
Name: Nack, Coya
Received: Jun,17 2023 12:47:17
Correspondence Type: Web Form
Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I strenuously oppose the draft ATMP for Mount Rushmore National Memorial. I disagree with the elimination of Interim Operating Authority (IOA) and believe that the National Park Service (NPS) and the Federal Aviation Administration (FAA) failed to complete due diligence to determine the true impacts to the operators, the public, and the Memorials resources in the ATMP process.

I had the opportunity of flying local Lakota youth as a day activity for the End the Silence program. As the actual local tribe to the area they were very appreciative that their youth were able to get the opportunity to see one of the 7 sacred locations in the black hills. The director of the program was thankful that the helicopters provided accessibility to black elk peak and gave his kids the opportunity the witness and learn about their sacred ground.

Correspondence ID: 220Project:97377Document:128168
Name: polinsky, destinee
Received: Jun,17 2023 13:10:59
Correspondence Type: Web Form
Correspondence: It was one of top favorite things to do and fly over

Correspondence ID: 221Project:97377Document:128168
Name: ,
Received: Jun,17 2023 17:03:06
Correspondence Type: Web Form
Correspondence: I am very much in favor of reducing helicopter tours to the maximum extent. Those who see it by air are just a small fraction of those on the ground and should not reduce the enjoyment of the majority by excessive noise that is produced by helicopters.

Correspondence ID: 222Project:97377Document:128168
Name: Goossen, Rod
Received: Jun,17 2023 18:42:02
Correspondence Type: Web Form
Correspondence: For comment on the proposed Air Tour Management Plan (ATMP) for Badlands National Park: The ATMP will hamper area small businesses' economic generation, prevent Americans from seeing and enjoying the taxpayer-supported parks they pay for and encourage further Federal Governmental encroachment and regulations on small business specifically and the American people in General.

I strenuously oppose the draft ATMP for Badlands National Park. I disagree with the elimination of Interim Operating Authority (IOA) and believe that the National Park Service (NPS) and the Federal Aviation Administration (FAA) did not properly conduct due diligence to determine the true impacts to the operators, the public, and park resources in the ATMP process.

According to the NPS documents, on average, from 2017-2019, 1,425 commercial air tours occurred over Badlands National Park every year. Under this draft ATMP, commercial air tours will be prohibited within the ATMP boundary of Badlands National Park.

With air tours prohibited inside the park boundary, we believe that air traffic would be concentrated in other areas resulting in significant community impact. Those impacts include significant safety concerns that were not addressed in the preparation of the plan.

The NPS failed to reach out to the operators to determine the economic impacts from implementing a management plan that so severely restricts overflights. This plan will take \$45 million out of the local economy over 10 years and destroy local institutions that have been in operation since the 1960s.

As the NPS and the FAA have released the draft ATMP it is very clear that the agencies have an agenda to eliminate the air tour industry. The real harm is not only to the air tour operators, but also to the National Park visitors, and the surrounding communities who support these operations. The ATMP is discriminatory against visitors who choose to experience the National Parks by aerial sightseeing.

As we move past the pandemic years, many National Parks saw their resources strained by the large number of visitors as the public began to travel again. Air tours are an important option for many visitors conducting a one-in-a-lifetime trip to see famous natural landmarks. The Park benefits greatly from reduced impacts as a result of air tours. Air tours reduce traffic in the park, reduce emissions as a result, improve guest experience and lessen impacts on park infrastructure such as walking trails that are inaccessible for the handicapped or elderly.

The National Parks should be available for all visitors to see. Limiting flights over the park unfairly limits access to the elderly, very young, disabled, and others. Limiting flights over the Parks is discriminating to those who might not have the time, resources, or physical ability to see the park any other way.

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

By further restricting an already limited number of allowable air tours, we are reducing opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance. Through carbon-offset efforts and strict altitude requirements to control noise just to name a few efforts air tour operators are constantly working to ensure they are responsible stewards of the nations parks. There are currently no restrictions or mitigation efforts for loud vehicles operating in the park, many of which make more noise than a passing helicopter.

Undoubtedly it is essential to preserve the National Parks, yet still enable visitors of all abilities to enjoy. Preservation is not achieved with elimination. While I oppose the draft ATMP, commercial air tour operators would welcome collaborative engagement with the FAA, NPS, and all interested parties to benefit the park and the visitors.

Correspondence ID: 223Project:97377Document:128168

Name: Goossen, Rod

Received: Jun,17 2023 18:44:01

Correspondence Type: Web Form

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

The ATMP will hamper area small businesses' economic generation, prevent Americans from seeing and enjoying the taxpayer-supported parks they pay for and encourage further Federal Governmental encroachment and regulations on small business specifically and the American people in General.

I strenuously oppose the draft ATMP for Badlands National Park. I disagree with the elimination of Interim Operating Authority (IOA) and believe that the National Park Service (NPS) and the Federal Aviation Administration (FAA) did not properly conduct due diligence to determine the true impacts to the operators, the public, and park resources in the ATMP process.

According to the NPS documents, on average, from 2017-2019, 1,425 commercial air tours occurred over Badlands National Park every year. Under this draft ATMP, commercial air tours will be prohibited within the ATMP boundary of Badlands National Park.

With air tours prohibited inside the park boundary, we believe that air traffic would be concentrated in other areas resulting in significant community impact. Those impacts include significant safety concerns that were not addressed in the preparation of the plan.

The NPS failed to reach out to the operators to determine the economic impacts from implementing a management plan that so severely restricts overflights. This plan will take \$45 million out of the local economy over 10 years and destroy local institutions that have been in operation since the 1960s.

As the NPS and the FAA have released the draft ATMP it is very clear that the agencies have an agenda to eliminate the air tour industry. The real harm is not only to the air tour operators, but also to the National Park visitors, and the surrounding communities who support these operations. The ATMP is discriminatory against visitors who choose to experience the National Parks by aerial sightseeing.

As we move past the pandemic years, many National Parks saw their resources strained by the large number of visitors as the public began to travel again. Air tours are an important option for many visitors conducting a one-in-a-lifetime trip to see famous natural landmarks. The Park benefits greatly from reduced impacts as a result of air tours. Air tours reduce traffic in the park, reduce emissions as a result, improve guest experience and lessen impacts on park infrastructure such as walking trails that are inaccessible for the handicapped or elderly.

The National Parks should be available for all visitors to see. Limiting flights over the park unfairly limits access to the elderly, very young, disabled, and others. Limiting flights over the Parks is discriminating to those who might not have the time, resources, or physical ability to see the park any other way.

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

By further restricting an already limited number of allowable air tours, we are reducing opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance. Through carbon-offset efforts and strict altitude requirements to control noise just to name a few efforts air tour operators are constantly working to ensure they are responsible stewards of the nations parks. There are currently no restrictions or mitigation efforts for loud vehicles operating in the park, many of which make more noise than a passing helicopter.

Undoubtedly it is essential to preserve the National Parks, yet still enable visitors of all abilities to enjoy. Preservation is not achieved with elimination. While I oppose the draft ATMP, commercial air tour operators would welcome collaborative engagement with the FAA, NPS, and all interested parties to benefit the park and the visitors.

Correspondence ID: 224Project:97377Document:128168

Name: McNary, David D

Received: Jun,18 2023 07:52:43

Correspondence Type: Web Form

Correspondence: These federal lands are required to be open to all the people to enjoy. Some people love hiking rugged trails, others prefer off road vehicle sightseeing, still others enjoy family car trips up paved roads to developed areas. Many board buses that bring them in groups to visit our national treasures. Some people are physically limited and adjustments are made where possible to allow for wheel chair access.

People climb to the tops of mountains to marvel at the vistas. Helicopter flight-seeing gives that mountain top view everywhere. It lets visitors see areas that are too remote or rugged for most people to reach. In contrast to other sightseeing,

no roads or trails need to be constructed, no tires tracks, erosion or trash gets left behind. The only impact is the sound of a vehicle passing by, much like a car, bus or motorcycle on the park roadways. The views from the helicopter are awesome and allow for great photos.

Not everyone can go helicopter sightseeing. Many are afraid of flying, some people get motion sickness and there is an expense many aren't willing to pay. For those that do chose this method to visit, it allows a quick visit to these parks, saving hours on the road to get there. It means less road traffic and people at the developed sites.

This proposal to eliminate helicopter sightseeing is unwise overreach. In my home state of Arizona we have the Grand Canyon. We probably have the most extensive helicopter and aircraft sightseeing operations in the world. Why is it ok here but not in other nation parks? No, this is arbitrary and capricious. These operations should continue without undue restrictions.

Correspondence ID: 225Project:97377Document:128168
Name: Jho, Harry
Received: Jun,18 2023 11:51:44
Correspondence Type: Web Form
Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with Blue Hawaiian and it was an incredibly educational experience for our children in understanding the geological formation of Hawaii.

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 226Project:97377Document:128168
Name: Gregory, Patricia
Received: Jun,18 2023 12:58:34
Correspondence Type: Web Form
Correspondence: I'm writing to share my concerns about the National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with Blue Hawaii on Kauai... it was a once in a lifetime experience. We are senior citizens and this was the only way we could see the natural beauty of the Napali Coast, otherwise accessible only by a difficult 12 mile trail.

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 227Project:97377Document:128168
Name: Adams, Paula
Received: Jun,18 2023 13:54:22
Correspondence Type: Web Form

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

Access to view national parks by air should be retained. It allows the grandeur of our parks to be seen from a wider perspective.

Air tours are an incredible service to Americans. If funding is an issue, park fees could be added on top of air fees, resulting in win win for all.

I strenuously oppose the draft ATMP for Mount Rushmore National Memorial. I disagree with the elimination of Interim Operating Authority (IOA) and believe that the National Park Service (NPS) and the Federal Aviation Administration (FAA) failed to complete due diligence to determine the true impacts to the operators, the public, and the Memorials resources in the ATMP process.

According to the NPS documents, on average, from 2017-2019, 3,914 commercial air tours occurred over Mount Rushmore National Memorial Park every year. Under this draft ATMP, commercial air tours will be prohibited within the ATMP boundary of Mount Rushmore National Memorial Park.

The FAA and the NPS failed to reach out to the operators to determine the economic impacts from implementing a radical management plan that so severely restricts overflights. This plan will take \$45 million out of the local economy over 10 years and destroy local institutions that have been in operation since the 1960s.

As the NPS and the FAA have released the Draft Air Tour Management Plan (ATMP) it is very clear that the agencies have an agenda to eliminate the air tour industry. The real harm is not only to the air tour operators, but also to the National Memorial visitors. The ATMP is discriminatory against visitors who choose to experience the National Memorial by aerial sightseeing.

As we move past the pandemic years, many national parks and memorials saw their resources strained by the large number of visitors as the public began to travel again. Air tours are an important option for many visitors conducting a one-in-a-lifetime trip to see famous natural landmarks. Visitors taking advantage of air tours benefit by avoiding traffic, wait times, and walking trails that are inaccessible for the handicapped or elderly, while reducing congestion and demand on park infrastructure. Helicopters represent the single lowest impact form of visitation to our parks. Helicopters reduce traffic congestion, emissions, sound and all ground-based impacts. Nothing is taken from the park except for memories.

The national parks and memorials should be available for all visitors to see. Limiting flights over Mount Rushmore unfairly limits the elderly, very young, disabled, and others to experience the Memorial. Limiting flights over Mount Rushmore is discriminating to those who might not have the time, resources, or physical ability to see the memorial any other way.

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

By further restricting an already limited number of allowable air tours, we are reducing opportunities to access our parks and memorials in a way that leaves little to no environmental footprint or disturbance. Through carbon-offset efforts and strict altitude requirements to control noise just to name a few efforts air tour operators are working to ensure they are responsible stewards of the nations parks and memorials. There are currently no restrictions or mitigation efforts for loud vehicles operating in Mount Rushmore, some of which make more noise than a passing helicopter.

Undoubtedly it is essential to preserve the National Parks and Memorials, yet still enable all forms of visitation so that all may enjoy. While I oppose the draft ATMP, commercial air tour operators would welcome collaborative engagement with the FAA, NPS, and all interested parties to benefit the memorial and the visitors.

Name: Chaudhary, Joceliza
Received: Jun,18 2023 14:17:15
Correspondence Type: Web Form

Correspondence: I am concerned about the plan to limit air tours over Volcanoes National Park. My family and I were able to experience the park on foot and from the air. I thought that having both perspectives were unique and amazing.

Please do not limit the air tours.

Correspondence ID: 229Project:97377Document:128168

Name: Northcutt, Kristan
Received: Jun,18 2023 16:41:26
Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with Blue Hawaiian and it was once in a life time experience!

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 230Project:97377Document:128168

Name: Kopitnik, Thomas A
Received: Jun,19 2023 10:01:39
Correspondence Type: Web Form

Correspondence: I would like to comment on the Air Tour Management Plan (ATMP) which provides the terms and conditions for 6 commercial air tours conducted over Mount Rushmore National Memorial (Park) 7 pursuant to the National Parks Air Tour Management Act (Act) of 2000.

It is my opinion that the proposed ATMP which prohibits commercial air tours within the boundaries of Mount Rushmore National Park is timely and very appropriate for implementation at this time. The current helicopter tour operator, Black Hills Aerial Adventures, has become a nuisance to the peaceful enjoyment of the park. The frequency of the helicopter tours by this operator combined with the close and inappropriate proximity of flights to the memorial, the visitor center, and other landmark areas within the park has disrupted the quiet serenity of the area. As a reminder, the park belongs to the taxpayers of the United States and to have one helicopter operator profiting greatly from tours into the park which disrupts the quiet serenity of the area is egregiously inappropriate and should have been regulated long ago. Air tours can be enjoyed outside of the park boundary which still allows viewing of the landmarks from a safe and appropriate distance. I have taken a helicopter tour with another company which remains outside of the park boundary and the view of the monument and other landmarks was perfectly fine without causing a nuisance to visitors on the ground. I strongly support this plan as written and hope that it is instituted. It is long overdue.

Correspondence ID: 231Project:97377Document:128168

Name: Skei, Evan
Received: Jun,19 2023 13:39:36
Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park.

Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with [Name of Operator] and it was [please provide your experience and why you shouldn't be restricted from the experience].

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nation's national parks.

As a frequent guest to our national parks, I do not want the option of seeing the parks from the air taken away. This is a short sighted proposal.

Correspondence ID: 232Project:97377Document:128168
Name: Wyrick, Chris
Received: Jun,19 2023 14:04:19
Correspondence Type: Web Form
Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with Blue Hawaiian and it was [please provide your experience and why you shouldn't be restricted from the experience].

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nation's national parks.

Correspondence ID: 233Project:97377Document:128168
Name: ,
Received: Jun,19 2023 14:41:58
Correspondence Type: Web Form
Correspondence: I support the proposed ATMP as a step toward progress and regulation of unregulated air tours. Specifically, identifying altitude and boundary limits on where operators fly. I question if the proposed boundary adequately addresses the soundscape objective. It appears the ATMP leaves open the possibility for compromise with tour operators to fly within a corridor still acceptable for passenger viewing of the sculpture, but well within the several mile range of noise a person on the ground and wildlife experiences specifically by helicopters.

My hope for this plan is it will include milestones for review, accountability and future public commentary incorporating the option to refine regulation of this plan as needed. While the ATMP establishes a protocol for operators who haven't ever had one, it is unrealistic to assume this first draft addresses all impacts to wildlife, natural soundscapes, wilderness character and visitor enjoyment objectives.

Correspondence ID: 234Project:97377Document:128168
Name: Schurtz, LuAnne
Received: Jun,19 2023 15:37:32
Correspondence Type: Web Form
Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park.

Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with [Name of Operator] and it was [please provide your experience and why you shouldnt be restricted from the experience].

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Thank you,

Correspondence ID: 235Project:97377Document:128168

Name: Privitera, Melaine

Received: Jun,19 2023 16:24:51

Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with [Name of Operator] and it was [please provide your experience and why you shouldnt be restricted from the experience].

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks.

Correspondence ID: 236Project:97377Document:128168

Name: Drysdale, James S. and Ellen F

Received: Jun,19 2023 16:25:57

Correspondence Type: Web Form

Correspondence: We purchased our cabin at 13331 Grizzly Gulch Road 25 years ago. It has been a refuge for family and friends located very close to Mt. Rushmore in the Norbeck Wildlife Preserve. The helicopters have gotten more and more frequent as the years have gone by and they are right overhead. When the helicopters are near conversation stops because you cannot hear. A simple pleasure like taking a nap is impossible in the summer season. I am not sure what effect all this noise does to the wildlife but it must be frightening.

It is such bad pollution in what should be this quiet, gorgeous forest.

Correspondence ID: 237Project:97377Document:128168

Name: Doldo, Jennifer

Received: Jun,19 2023 17:04:04

Correspondence Type: Web Form

Correspondence: I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with [blue Hawaiian tours] and it breathtaking to see all of the views

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nations national parks

Correspondence ID: 238Project:97377Document:128168
Name: Lish, Christopher
Received: Jun,19 2023 20:18:58
Correspondence Type: Web Form
Correspondence: Monday, June 19, 2023

Volpe National Transportation Systems Center
Kaitlyn Rimol, V-326
Attn: Mount Rushmore National Memorial ATMP
55 Broadway
Cambridge, MA 02142

Subject: Protect visitors and wildlife at Mount Rushmore National Memorial from air tour noise pollution -- Air Tour Management Plan - Mount Rushmore National Memorial

To Mount Rushmore National Memorial Superintendent Michelle Tourville-Wheatley

I strongly support the recommendation to prohibit noisy air tours over Mount Rushmore National Memorial. National parks are places people go to appreciate scenery and history, watch wildlife, and enjoy interpretation.

Unfortunately, commercial air tours have been flying directly over areas where most visitors gather to enjoy the National Memorial. Air tours are in direct conflict with interpretive tours.

Wildlife--including eagles, peregrine falcons, mountain goats, and mule deer--are impacted by noise generated by air tours. Current air tour operations disturb the Memorial's wildlife and result in changes to behavior that could negatively impact their survival.

Most visitors go to national parks to get away from the hustle and bustle of our everyday lives--to appreciate nature and learn about our history. Noisy air tours should not be allowed to ruin visitor experiences and harm wildlife.

I strongly support the recommendation to eliminate air tours over and near Mount Rushmore National Memorial.

Thank you for your consideration of my comments. Please do NOT add my name to your mailing list. I will learn about future developments on this issue from other sources.

Sincerely,
Christopher Lish
San Rafael, CA

Correspondence ID: 239Project:97377Document:128168
Name: Boland, Anna
Received: Jun,20 2023 10:28:47
Correspondence Type: Web Form
Correspondence: Hello,

I am writing to raise concerns about the U.S. National Park Services decision to create air tour plans over all the National Parks, including Haleakala and Volcanos National Park in Hawaii and Mount Rushmore National Memorial and Badlands National Park in South Dakota that could eliminate access to our national parks via air.

Access to our national parks by air tours should not be eliminated as that is one of the most magnificent ways to see the park. Plus, for many, including those who are disabled, that may be the only way for them to experience the beauty.

I had the opportunity to experience an air tour with [Name of Operator] and it was [please provide your experience and why you shouldn't be restricted from the experience].

The National Parks should be available for all visitors to see. I ask that you please do not limit or eliminate air tours over our nation's national parks.

Correspondence ID: 240Project:97377Document:128168
Name: Ford, Diana
Received: Jun,20 2023 13:18:08
Correspondence Type: Web Form
Correspondence: Please consider the sanctity of the Paha Sapa to the indigenous peoples as planning moves forward. These areas are already sadly commercialized. Don't add salt to the wound.

Correspondence ID: 241Project:97377Document:128168
Name: Busse, Andrew C
Received: Jun,20 2023 13:22:13
Correspondence Type: Web Form
Correspondence: Black Hills Helicopters, Inc. was founded with the foundational goal of increasing helicopter safety in the Southern Black Hills. I believe this draft ATMP would support our number one goal by aligning all helicopter operator's routes near the Memorial to aid in same direction traffic.

Currently as BH Aerial Adventures, the only helicopter operator allowed in the monopolized Memorial, exits the Park, the helicopter traffic is confronted head on. This confluence has been the source of numerous FAA investigations (see FAA letter dated July 20, 2020 which spells out the need to have both operators going the same direction). The draft ATMP would allow all operators to fly the same route and the same direction and eliminate the high risk head on traffic. The FAA also found there would be no objections in terms of safety to having both operators in the Park. The issue arises allowing one operator in and another operator out; creating conflicting routes.

Regarding the economic impact, the draft ATMP would have no affect on the economics of the industry here in the Black Hills. The Memorial at 1278 acres is so small, that commercial tour aircraft at the 1/2 mile boundary can still view the Monument; thus an economic argument has no merit. Also, it should be noted that the current sole operator into the Memorial, has not been registering their aircraft with the state of South Dakota (skirting the only tax revenue the state could see from the helicopter tour operations).

From a ground based user perspective it cannot be overstated; the area has a helicopter problem. This is a problem in terms of safety and noise. Even during this comment period, helicopter altitudes haven't improved and the proximity to ground based users in the Memorial hasn't changed. Which, during the comment period would be the smartest thing to do. This last weekend, there was a helicopter interrupting conversation in the Memorial boundaries every 2-5 minutes. I have provided numerous emails and letters over the past 7 years to the FAA and NPS regarding this issue. I have personally done everything possible to help both government entities resolve these issues.

Please refer to the email I sent the NPS and FAA officials on 5/19/2020 outlining a balanced approach to the Air Tour Management Plan. It specifically laid out a proposed route that was .52 nm away from SD HWY 244 at an elevation of 6,000' MSL/1364' AGL 137 degrees southeast of the Visitor Center. This route was produced to maximize safety, consolidate noise along the roadway, and balance out viewing opportunities.
It significantly reduced the decibels below the 52 dBA threshold for 95% of Park visitors, climbers, and hikers.

I also detailed the need to reduce the number of helicopters in the air at any given time to 2 per operator, stagger take off times by 10 mins, and increase the shortest duration of flights offered to increase time between noise exposures.

It is also surprisingly notable the absence of any detailed plan to address competitive bidding to ensure competition in the provision of commercial air tour operations over the park/tribal land as explicitly stated in 49 U.S.C. § 40128(a)(2) (B):

The Administrator, in cooperation with the Director, shall develop an open competitive process for evaluating proposals from persons interested in providing commercial air tour operations over the park. In making a selection from among various proposals submitted, the Administrator, in cooperation with the Director, shall consider relevant factors, including--

- (i) the safety record of the person submitting the proposal or pilots employed by the person;
- (ii) any quiet aircraft technology proposed to be used by the person submitting the proposal;
- (iii) the experience of the person submitting the proposal with commercial air tour operations over other national parks or scenic areas;
- (iv) the financial capability of the person submitting the proposal;
- (v) any training programs for pilots provided by the person submitting the proposal; and
- (vi) responsiveness of the person submitting the proposal to any relevant criteria developed by the National Park Service for the affected park.

Please reference the FAA Report dated July 20, 2018. Which highlights the current MORU helicopter tour operator's acknowledged and verified history of incidents and accidents. This too has been excluded from conversation and not been addressed in the evaluation of proposals.

This need for competition and competitive bidding to prevent a monopoly language is also reiterated again in 14 CFR 136.41(c):

New entrant operators. The Administrator, in cooperation with the Director, may grant interim operating authority under this paragraph (c) to an air tour operator for a national park or tribal lands for which that operator is a new entrant air tour operator if the Administrator determines the authority is necessary to ensure competition in the provision of commercial air tour operations over the park or tribal lands.

The intent of the 106th Congress was not to monopolize our National Parks but to protect them. Currently, these draft ATMPs will only solidify the monopoly held by a select few operators who were allegedly operating when the National Parks Air Tour Management Act of 2000 was passed on 4/5/2000; over twenty-one years ago. It was not Congress's intent to hand only those self-proclaimed operators the permanent keys to the doors of one of our Nation's greatest treasures and with it a valuable right to be bought and sold, it was to reign in the industry and hold operators accountable to preserve our treasured resource.

Again, this notion is reiterated by the FAA's Final Ruling on IOAs by Deputy Chief Counsel James W. Whitlow in the Federal Register/Vol. 72, No. 29:

Given the specificity of the IOA authority and the limitations placed on that authority, FAA has concluded that Congress did not intend for the operators to possess it as a valuable right to be bought and sold. IOA was designed as a temporary solution to allow operators already conducting air tours at the time of the enactment of the Act to continue to operate pending completion of the ATMP, or new entrants to begin operation to ensure competition.

If this is the case, why is it that when BHAA was purchased two years ago for over \$7,000,000.00 with less than \$1,000,000.00 of physical assets and no real property; were they allowed to continue operations in MRNM uninterrupted? Why did they pay an extra \$6,000,000.00 above physical asset evaluation; especially when normal helicopter tour company evaluations are 4-5 times EBITA? What was sold were IOAs in direct violation of the Federal Regulations and the FAA ruling.

As the FAA also states, "the operation specification authorizing IOA, ATMP, or VA is not a property interest of the certificate holder and may not be purchased or sold between certificate holders or operators. Rather, it is an operating privilege that can be modified or revoked by the FAA";

In summary, if the ATMPs do not specifically address this issue in detail, we can presume the timeline for amendment could prolong these monopolies for another 21 years. The public will not be granted the ability to freely choose amongst operators for reasons of safety and financial feasibility as set forth in the provision of commercial air tour operations over the Parks as mentioned in 49 USC 40128, Title 14 CFR Part 136, Mr. Whitlow's findings in the Federal Register Vol. 72/No. 29, FAA Order 8900.1, FAA N8900.312 and FAA AC 136-1.

Failure to include a detailed plan for competitive bidding in the ATMP will effectively monopolize our National Parks for the foreseeable future and in doing so, we have completely violated the interests of the American people and the intent of the

106th Congress.

It would be my recommendation, to include a detailed competitive bidding process for flights into our National Parks in every ATMP to prevent a monopoly as stated in the plain law and not an amendment as proposed. Please understand it has been over 21 years of the joint effort of the NPS and FAA to develop these draft ATMPs that range from 14 to 15 pages long per Park/Monument. An amendment, could trigger a need for N.E.P.A studies and a possible EIS and further prolong a monopoly indefinitely, if one exists.

Lastly, please reconsider our previous recommendations for routes, altitudes and reduction in the number of aircraft in air.

We support the draft ATMP as written.

Respectfully,

Andrew Busse

Correspondence ID: 242Project:97377Document:128168
Name: howard, christopher
Received: Jun,20 2023 13:39:16
Correspondence Type: Web Form
Correspondence: Thank you for the opportunity to comment on the proposed Air Tour Management Plan for Mount Rushmore National Memorial.

I strenuously oppose the draft ATMP for Mount Rushmore National Memorial. I disagree with the elimination of Interim Operating Authority (IOA) and believe that the National Park Service (NPS) and the Federal Aviation Administration (FAA) failed to complete due diligence to determine the true impacts to the operators, the public, and the Memorials resources in the ATMP process.

According to the NPS documents, on average, from 2017-2019, 3,914 commercial air tours occurred over Mount Rushmore National Memorial Park every year. Under this draft ATMP, commercial air tours will be prohibited within the ATMP boundary of Mount Rushmore National Memorial Park.

The FAA and the NPS failed to reach out to the operators to determine the economic impacts from implementing a radical management plan that so severely restricts overflights. This plan will take \$45 million out of the local economy over 10 years and destroy local institutions that have been in operation since the 1960s.

As the NPS and the FAA have released the Draft Air Tour Management Plan (ATMP) it is very clear that the agencies have an agenda to eliminate the air tour industry. The real harm is not only to the air tour operators, but also to the National Memorial visitors. The ATMP is discriminatory against visitors who choose to experience the National Memorial by aerial sightseeing.

As we move past the pandemic years, many national parks and memorials saw their resources strained by the large number of visitors as the public began to travel again. Air tours are an important option for many visitors conducting a one-in-a-lifetime trip to see famous natural landmarks. Visitors taking advantage of air tours benefit by avoiding traffic, wait times, and walking trails that are inaccessible for the handicapped or elderly, while reducing congestion and demand on park infrastructure. Helicopters represent the single lowest impact form of visitation to our parks. Helicopters reduce traffic congestion, emissions, sound and all ground-based impacts. Nothing is taken from the park except for memories.

The national parks and memorials should be available for all visitors to see. Limiting flights over Mount Rushmore unfairly limits the elderly, very young, disabled, and others to experience the Memorial. Limiting flights over Mount Rushmore is discriminating to those who might not have the time, resources, or physical ability to see the memorial any other way.

Like ground-based tours, air tours are a valid part of our visitor experience, providing a unique window from which we can

share our cultural, historical and environmental sites with the world. Air tours require no ground-based infrastructure at the park, which allows visitors accessibility without the need for roads, trails, signs, bathrooms, garbage cans, or other services.

By further restricting an already limited number of allowable air tours, we are reducing opportunities to access our parks and memorials in a way that leaves little to no environmental footprint or disturbance. Through carbon-offset efforts and strict altitude requirements to control noise just to name a few efforts air tour operators are working to ensure they are responsible stewards of the nations parks and memorials. There are currently no restrictions or mitigation efforts for loud vehicles operating in Mount Rushmore, some of which make more noise than a passing helicopter.

Undoubtedly it is essential to preserve the National Parks and Memorials, yet still enable all forms of visitation so that all may enjoy. While I oppose the draft ATMP, commercial air tour operators would welcome collaborative engagement with the FAA, NPS, and all interested parties to benefit the memorial and the visitors.

Correspondence ID: 243Project:97377Document:128168
Name: ,
Received: Jun,20 2023 14:31:16
Correspondence Type: Web Form
Correspondence: If this goes through you will put several companies out of business.The government is notorious for making changes without proper research and to see how it will affect others.

Increase the altitude if you need to cut down on noise.

Correspondence ID: 244Project:97377Document:128168
Name: Spotts, Richard A
Received: Jun,20 2023 15:41:32
Correspondence Type: Web Form
Correspondence: Kudos to NPS staff for this excellent EA and draft ATMP.

I reviewed these informative documents and I am grateful to those who prepared them.

I vigorously support the NPS EA Preferred Alternative 2. I hope that NPS will approve and implement this necessary Alternative 2 and the ATMP to prohibit future commercial air tours.

I've heard and seen commercial air tours while visiting national parks. I found them to be annoying and incompatible with an appropriate park experience. Most park visitors cannot afford these tours and yet they are subjected to their impacts while visiting parks. This is unfair.

If people want to view national parks from the air, I think that NPS should consider taking some high-quality videos from an NPS administrative flight to show in the park visitor center and/or to sell DVDs in park visitor center gift shops. This would make such aerial park views available to a wider audience, and without the continued adverse impacts in the park. This would also reduce the burning of fossil fuels by aircraft over time, where such burning would contribute to the worsening climate crisis.

I commend NPS for this important work. Thank you very much for considering my input.

Correspondence ID: 245Project:97377Document:128168
Name: Dahl-McGlone, Ben
Received: Jun,20 2023 16:22:39
Correspondence Type: Web Form
Correspondence: This plan is trying to limit the amount of sound pollution in and around the Mt. Rushmore National Monument due to air tours (which is limited because they are only around the monument for approximately 30 seconds to one minute and then they fly away) but it fails to take into account the amount of sound pollution hundreds of thousands of

motorcycles that drive by the monument every single year where you can hear the bikes for an extended period of time (much longer than an air tour). People with extreme disabilities will also be impacted by this plan as it is removing a safe, convenient and fast way to enjoy the monument in the same, if not more fun, way. This plan, if enacted, will effectively cripple the small businesses that operate these air tours. This plan is essentially saying "too bad so sad" to the people who do not have the time to spend hours at the monument and only want to see the presidents faces while an air tour can provide the exact experience they are looking for. I have personally taken one of these air tours and I had an amazing time seeing the monument in the exact way I wanted to see it. Taking these air tours away not only affects the people operating these air tours but it also takes away an option for folks like me who want the experience of an air tour while also seeing something that is iconic to this country. If we are going to take away air tours then we might as well take away the motorcycles too because they are much more annoying than the helicopters.

Correspondence ID: 246Project:97377Document:128168
Name: Paulson, Steve
Received: Jun,20 2023 16:39:14
Correspondence Type: Web Form
Correspondence: I'm writing to comment on the National Park Service's proposal to limit low-altitude air traffic over Mount Rushmore National Memorial and Badlands National Park.

I strongly support limits on these overflights in both areas. These flights have long interfered with the Park Service's ability to manage these lands for the benefit of the people and the enjoyment of future generations.

At Mount Rushmore, the natural setting of the memorial is continually disturbed - and has been for many years - by the noise of helicopter flights. That natural setting is highly valued by visitors, and the operation of a private helicopter business should never have been allowed to diminish the setting and the enjoyment of the memorial by the American people.

This action is long overdue.

With regard to the Badlands National Park, the site is valued worldwide because of the natural setting, the quiet, the wilderness area within the park, as well as the park's cultural resources and sacred sites.

There is no good argument for allowing a private flight service to diminish the experiences of visitors and the natural setting where those unique experiences are possible.

Please carry out the proposed limitations.

Correspondence ID: 247Project:97377Document:128168
Name: DeHaai, Jim R
Received: Jun,20 2023 17:11:46
Correspondence Type: Web Form
Correspondence: I believe the largest complaint of the helicopter tours is the noise level affecting those both visiting and locals. Perhaps by increasing the altitude in which they can fly and also limiting hours of operation would be a good compromise. This would allow the tour companies to continue to operate and reduce noise levels to those at Mount Rushmore and surrounding areas. I should add that by increasing the boundaries of non operation would simply push more traffic to those that live and visit outside the park boundaries.
Thank-you.

Correspondence ID: 248Project:97377Document:128168
Name: Volle, Adam P
Received: Jun,20 2023 18:06:09
Correspondence Type: Web Form
Correspondence: Equal access from the air and the ground.

Correspondence ID: 249Project:97377Document:128168
Name: ,
Received: Jun,20 2023 19:29:38
Correspondence Type: Web Form
Correspondence: INTRODUCTION

Thank you for the opportunity to provide comments regarding the proposed Air Tour Management Plan (ATMP) for Mt. Rushmore National Memorial (MORU). I understand that the FAA alongside the NPS has the authority to regulate Commercial Air Tours within ½ mile of any park unit boundary. The concept is reasonable and necessary and based in law as passed under the National Parks Air Tour Management Act of 2000. (NPATMA). I believe in the responsible operation of air tours over public lands. It should be limited and adjusted from time to time based on changing conditions.

After careful review of the documents produced by the NPS, I believe that the proposed 100% removal of Commercial Air Tours from MORU represents a significant overreach without accurate data-backed justification and without the required participation of key stakeholders. The use of outdated and incorrect data discriminates against the operators and the public. Air Tour Management Plans are not Air Tour Elimination Plans, but in the case of both Badlands National Park and Mt. Rushmore National Memorial that is exactly what is happening.

Additionally, I believe that the ATMP process as originally forced at seven parks (subsequently expanded) by the lawsuit against the FAA filed by Public Employees for Environmental Responsibility and Hawaii Island Coalition Malama Pono has not been conducted according to the requirements of NPATMA and has completely ignored safety and economic impact. The ATMP process is being implemented with a "check the box" method rather than a thoughtful plan that seeks to reduce impacts, improve safety, and maintain economic viability of long-standing private companies with millions invested in delivering world class ultra-low impact tour offerings. The assertion by FAA Environment and NPS staff that "Operators can simply operate outside the boundaries or repurpose aircraft" lacks a fundamental understanding of business, and specifically helicopter operators. This dismissal of the impacts is offensive, and clearly highlights the lack of expertise at the table during the planning and development process.

Aerial Tours specifically, present the single lowest impact method of visitation to any park unit when operated responsibly and within agreed upon routes and altitudes. Helicopters do not leave anything behind, have a minimal impact to air quality, and do not require support staff or vehicles. We do not damage trails, create the need for trails, harass wildlife, leave human waste, damage roadways or other park infrastructure, require garbage removal, and introduce only sound to the environment which dissipates quickly. Helicopters do not need runways and airport infrastructure, limiting their overall impact even further.

Mt. Rushmore National Memorial is not a National Park and does not possess the characteristics that can be found in other units of the Park Service. The central feature of the 1200-acre memorial is a manmade sculpture, achieved through the destruction of the natural features of the mountain. Outside of the viewing area lies an enormous parking garage to house the vehicles of visitors to the memorial. Furthermore, manmade light sources illuminate the sculpture at night, adding unnatural light into an area where "wilderness character" is claimed.

The ATMP as proposed will create additional impacts that have specifically been excluded from the analysis. While Commercial Air Tours are being targeted, there are multiple commercial air transportation and utility flights that will be implemented by the operators to remain in business which NPATMA does not regulate. These flights are free to operate inside the boundary of the memorial and could rise to a frequency similar to air tours. The EA dismisses this possibility as "unknowns", but rest assured this is an impact that must be considered and evaluated. I believe that moving forward without the analysis of these potential impacts is irresponsible and will affect all stakeholders.

If the impacts of these commercial flights are combined with Commercial Air Tours conducted outside of the ATMP area, the impacts are highly likely to increase. This is especially true given the proximity to memorial borders that existing tours are currently operated. The relatively short distances that the current routes will move will have very little effect on the impacts imagined in the EA.

Based on the above, I believe it is the best interest of MORU and operators to come to the table with Voluntary Agreements. The Voluntary Agreement is specifically allowed by the court order and by NPATMA. This Voluntary Agreement could address the very operations discussed above and allow the FAA and the NPS a say in how they are conducted. Failing to do so would remove the ability of the FAA and NPS outside of rule change, to regulate those operations. I believe it is in the best interest of the park units and the operators to exercise this option and give both sides an opportunity to work together to reduce impacts in a real way.

With regard to Voluntary Agreements, I just learned today from the owner of Eagle Aviation that such an Agreement was put on the table for Eagle Aviation in a meeting held at the Rapid City FSDO in 2021. The majority stakeholder (Rushmore Helicopters and Black Hills Aerial Adventures) was excluded from this meeting, and a separate meeting was not proposed or held for either company, despite the Voluntary Agreement desire being known by Keith Lusk of the FAA at the time.

While more details are needed, this is a disturbing development that represents a significant concern about the transparency of the process. The details and facts of this meeting will be discovered during the FOIA process which has been initiated but will obviously not be available prior to the expiration of the ATMP public comment process. The 30-day public comment period is simply not enough time for anyone to respond thoroughly to the volumes of data produced for comment.

I have significant concerns that members of, or donors to, Public Employees for Environmental Responsibility are potentially employed by and involved in the very agencies tasked with the completion of these plans, representing a serious conflict of interest. I believe this needs to be vetted thoroughly prior to the finalization of any documents related to ATMP to ensure extreme bias is not allowed to influence the process.

All analysis for the proposed ATMP was produced "in house" and was not reviewed by any third party for validity or method, which also represents a significant appearance of bias. Models used by the FAA for analysis are based upon airports, not specific models developed to measure impacts of Commercial Air Tours. This is discriminatory to operators and the public. Based on these facts alone, I believe this warrants a delay until these issues can be satisfied.

The ATMP Planning Process discriminates against the public in limiting its choices, and directly discriminates against mobility challenged individuals in their ability to enjoy our public lands in a method of their choosing. The Americans with Disabilities Act (ADA) was not consulted or reviewed in the formulation of the plan, as admitted by FAA staff during the May 24th "Public Meeting" for BDL, and confirmed during the Public Meeting for MORU on June 1st, 2023. I strongly believe this is something that should be addressed. Having "some" or even "most" areas of a visitor center accessible, does nothing to address access to ALL areas of a park unit. Before implementation, the ADA should be reviewed and considered in the formulation of any plan. This area of concern is ideally served through aerial tourism, which provides access to ALL. I believe that one of the reduced Alternatives or a Voluntary Agreement would be an excellent remedy to this concern while providing a mechanism for all parties' interests to be addressed.

NPATMA requires at least one meeting during the development of the plan to be held. This meeting was not held in any way, shape, or form. I reject the assertion by park staff that the public meetings in response to the DRAFT ATMP constitute this "development" meeting. Development means, "during the process" according to most definitions, and this did not occur. Holding a meeting with a draft finished product is not "during development". I believe this to be a violation of the letter and spirit of NPATMA, and this should be remedied.

Safety is a critical concept and the biggest mission the FAA fulfills. In the development of this plan behind closed doors, Safety has been completely and systematically ignored. The local FSDO provided comments and suggested courses of action and were ignored. The helicopter specialist in the office was specifically excluded from the conversation regarding ATMP. When inquiries were made as to why this was the case, it was ignored during both "Public Meetings" for both MORU and BDL. Subsequent inquiries to the FSDO indicated that it was due to "conflict of interest". FAA Environment and NPS produced their own internal EA without any outside review. That represents real conflict of interest. I believe that the input from the Rapid City FSDO should have been utilized in the planning process and not ignored. The Helicopter Expert in the Rapid City FSDO should have been an integral part of the planning process from a safety perspective. My opinion is that the appearance of conflict of interest was simply an excuse to shelve safety, as it is inconsistent with NPS goals. I have initiated a FOIA request to get to the bottom of what has transpired. The public deserves protection and to be assured that safety is at the heart of all aviation activities.

The DRAFT ATMP presents significant safety issues that were never addressed in any way shape or form in the planning process. I have not been able to find one single risk analysis that deals with the compression of known air routes into a single corridor, which is the central elevated risk. The FAA is tasked with ensuring the highest levels of safety, and this is a serious failure. Accidents are MORE likely with this action, not less likely. I believe the ATMP process needs to include a safety element, and so did the judge in the original case who expressed his concern that safety would not be adequately addressed along with other elements such as economic impacts.

The agencies have failed to engage with NPOAG during this process. NPOAG was created to assist with this very process. By not working with this established resource and source of expertise, the ATMP process is evolving in an expertise vacuum. Neither the NPS or the FAA Environmental folks possess the expertise in operations or safety to a level that is needed for the development of these plans. This was admitted on more than one occasion during the "Public Meeting" held on June 1st.

I would ask that you consider the following arguments prior to issuing a final ATMP for Mt. Rushmore National Memorial:

Noise

In the analysis under the impact of noise, the FAA and NPS fail to identify what "sound" (noise) is associated with the Parks. Some examples they give us are the native drumming at Yosemite National Park or the music at New Orleans Jazz National Historical Park.

The environmental assessment (EA) fails to analyze the possible benefits of any quiet technology (QT) under Alternative 1, 3 or 4. This failure prejudicially influences the results. Additionally, although Alternative 2 (no air tours) would eliminate all air tour noises within the ATMP planning area, it will cause air tours to begin outside of the ATMP planning area which was specifically excluded from analysis. This will cause new issues that could result in increased noise impacts when coupled with other commercially viable flight offerings the operators will likely engage in.

Unlike Alternative 2, if the FAA was willing to enter into a Voluntary Agreement, it would be possible to influence operators to restrict air tours outside of the ATMP planning area in addition to decreasing the number of tours allowed per year. This is the only opportunity that could lessen overall impacts inside the memorial and to the surrounding wilderness.

Ultimately, it appears that the FAA and NPS recognize that Alternative 3 and 4 would reduce the impact of noise to the park but decided that Alternative 2 would eliminate it completely within the ATMP planning area. This is a false premise. Alternative 2 will not eliminate noise from the planning area at all, based on the geography and proximity that tours displaced from the ATMP area would operate. This was specifically excluded from the analysis. I believe this must be evaluated, and the DRAFT ATMP as proposed should not be put into place until these potential significant impacts are addressed.

The noise data as presented in the EA, which was prepared by sources within the government and was not reviewed by a third party, is outdated. I believe this represents significant bias, and the process should have third party oversight to remove this bias.

The base map for ambient noise was collected in 2003, and travel patterns have dramatically changed in the past 20 years. 20-year-old data is not contemporary or representative of current ambient noise. I would ask that new data be measured, in order to accurately model impacts. I would also ask that prior to implementation, an outside third party review the EA for accuracy and method.

The other data used to determine air tour impacts was based on incorrect assumptions of what Air Tour Operators are doing. It is fair to offer a challenge to the validity of the data, specifically within the last three years. Beginning in 2021, the altitudes flown over the memorial were increased and routes modified by the current operator in response to internal concerns from the new owners of Rushmore Helicopters and Black Hills Aerial Adventures, the majority holder of IOA for MORU. This action was unsolicited and was undertaken by the new owners in order to provide an extra buffer for sound around certain memorial features and in the areas beyond the memorial in which operators fly.

The routes that were provided by the operators in years past are not contemporary, but to a smaller degree than altitudes. In both cases, had the correct routes and altitudes been evaluated, the EA would have reflected a lower impact than what is being claimed. I will stipulate that all non-natural sounds contribute to the soundscape, including helicopters. I believe the FAA and the NPS have hand-picked data to include/exclude, and the results do not present a true picture of unnatural sounds that are experienced in the park.

It should be noted that in the Appendices for the EA, Eagle Aviation was listed as a reference, but not any of the other companies that hold IOA. Based on this, it is hard to conclude where the information came from to formulate the parameters for analysis. I would request that the operators be engaged for accurate information for inclusion in the EA. Not completing this process is highly prejudicial to the operators and represents decisions made on faulty data.

The EA further discriminates in avoiding the evaluation of other sound sources not related to Commercial Air Tours. I believe all generators of unnatural sound should be analyzed to determine the true impact of helicopter sounds.

According to the EA, "A unique noise modeling profile was developed for each modeled aircraft and route combination based on typical aircraft climb rates, descent rates, power settings and speeds during the different phases of flight (cruise, climb, and descent)."

I find this to be general and ambiguous and may be inaccurate. The use of "typical" data should not be used to determine specific impacts. There are many parameters missing from the list of considerations such as temperature, wind velocity and density altitudes. Power settings as listed above are highly unlikely to be accurate based on company policies and procedures. All of these factors directly affect the noise that helicopters are capable of producing. Turns, climbs, descents, all play a role.

A study was commissioned by the Town of Keystone to measure noise generators in the town of Keystone. That study concluded that motorcycles were the top sound generator in the town. The operator flying from the Rushmore Heliport, takes off over town and is climbing out to their desired altitudes over the town of Keystone at much lower altitudes with higher power settings, and the motorcycle traffic still produced more noise. The noise from motorcycles lasts longer in the soundscape than does sound from a helicopter.

Furthermore, the references listed in the appendix for the EA also confirm this, but that was conveniently left out of or minimized in the EA. Mt Rushmore is a destination for motorcycles during the summer months when the helicopters are also operating. This has also grown exponentially since 2003, making the data used to model even more obsolete. The motorcycle traffic exists in the park all year, and builds consistently throughout the summer to a high volume in August during the Sturgis Rally.

I would ask that the proposed ATMP not move forward until these corrections have been made and Alternative courses of action have been evaluated.

Air Quality & Climate Change:

Although allowing air tours would cause some carbon monoxide (CO) omissions to result, none of the Alternatives would cause pollutant concentrations to exceed one or more of the National Ambient Air Quality Standards (NAAQS) for any of the time periods analyzed. The operation of a single helicopter for Commercial Air Tours represents far less emission potential than any combination of ground-based vehicle traffic.

Furthermore, like the noise analysis, the EA recognizes the potential for tours to be flown outside of the ATMP Planning Area that may arise from the DRAFT ATMP, Air Quality is not measured or analyzed based on this. Furthermore, Air Quality benefits are ignored in the context of a Voluntary Agreement which could possibly reduce or eliminate tours outside of the ATMP Planning Area.

Ultimately, even though there are more emissions that result from Alternative 1, 3, and 4, such emission does not amount to any danger to the environment. Additionally, although Alternative 2 could result in the reduction of any CO being emitted within the ATMP planning area, it may also result in the increase of CO emissions outside the ATMP planning area. Such result may be more dangerous than the current emissions. Additionally, emissions from outside of the ATMP Planning Area

would represent an impact inside of the ATMP Planning Area as a result of wind patterns. I believe this requires further analysis to include the displacement of Commercial Air Tours and the impact on the ATMP Planning Area.

Biological Resources

The two animals that I found to be the most important in the EA were the Tricolored Bat and the Peregrine Falcon. The Tricolored Bats are nocturnal mammals that forage at treetop level or over waterways and forest edges at dusk with slow, erratic flight patterns. Alternative 1, 2, 3, 4, and a Voluntary Agreement would all bring about the same result. Currently, contrary to numbers stated in the analysis, Commercial Air Tours are operated from 9:00 AM to 6 PM during the season in which they operate. This is far removed from Sunrise or Sunset, which would result in no disturbance during the bats' active hours.

Second, the Peregrine Falcon is a species that is considered threatened in the state of South Dakota. This species nests along remote cliffs and ledges, where their nests, called scrapes, are just small depressions in gravel. The nesting period for the Peregrine Falcon is commonly in the springtime. Furthermore, the EA identifies that although Peregrine Falcons have shown reactions to aircraft, they display stronger reactions and are therefore more sensitive to disturbance from humans, other animals, and boats than they were to overflights from helicopters. Additionally, when Peregrine Falcons were exposed to helicopters from 1,000 meters (3,281 ft) or less, only 2-3% of individuals had in-flight responses. There was no mention of any nesting sites, or the impact of lighting the memorial at night to any potential nesting sites.

In conclusion, if the NPS was genuinely concerned about the impacts to biological resources, there are other actions that could be taken that would be more beneficial/efficient. Restricting access to areas where these animals are likely to reside in and changing park hours are good examples of actions that could be taken that would have a far greater benefit.

Furthermore, it is my opinion that the EA under this section is not convincing enough. The EA does not identify any concrete evidence that would show a strong relationship between air tours and impact to these animals. It merely points out basic information that is "somewhat" common sense. For example, it may be true that the sound (or even the sight) of a helicopter may make these animals more tense, however, the same can be said about hikers walking near these animal's habitat or a group of individuals that are too loud. (Bikers!) Or as is very common in all national parks, animals that are exposed to and conditioned to road noise and visitor interaction. In some places, the roads provide cover from predators. While not the case at Mt. Rushmore, this is a phenomenon observed in other parks.

Additionally, the DRAFT ATMP would (more likely than not) result in displaced Air Tours, which could be more harmful to animals that reside outside of the ATMP planning area for a few reasons:

1. The FAA would have less control over air tours that occur outside the ATMP planning area.
2. By eliminating air tours completely, operators will be forced to take new routes and, potentially, more frequently.
3. Biological resources outside of the ATMP Planning Area could be affected more adversely, as they are not conditioned to the presence of people and un-natural sounds at the same frequency currently.

Ultimately, Alternative 3, 4, or a Voluntary Agreement would provide the best opportunity to mitigate any potential impact that could exist.

Cultural Impacts

The EA in section 3.4 takes some significant liberties in the formulation of conclusions. None of the current tour flights take place over native lands as defined by federal law. Section 106 seeks to provide guidance for the establishment of cultural landscapes. In the EA, there have been no physical demonstrations of impact to sensitive cultural sites noted. Only references to "Feeling and Setting".

Adverse impacts to these resources would occur if the Alternative would alter the characteristics of a cultural resource that contribute to its significance in a manner that diminishes the integrity of the resource's location, design, setting, materials, workmanship, feeling, or association. The EA determined that commercial air tours, by their nature, have the potential to impact resources for which feeling and setting are contributing elements, but offer no data to support actual impacts. A

property will have integrity of "setting" if the physical features that define the area surrounding the property convey the essential character of the setting as it was during the period of significance, and "feelings" defined as a property that is able to express the aesthetic or historic sense of a particular period of time through its physical features retains integrity of feeling. Commercial Air Tours do not alter this setting. All of the other traffic through the park to include vehicles and pedestrians, do alter the setting.

However, integrity of "feeling," which depends on individual perception, is never sufficient to support eligibility on their own under section 106. Additionally, if the undertaking will have no effect on historic properties, a finding of "no historic properties affected is appropriate (e.g., project-related to noise that does not "permanently" alter a "setting" that contributes to the historic significance of a qualified historic property for the NRHP). Finally, the EA points out issues of "unreasonable interference with a tribes' connections to the sacred landscape," and it may impact the Park's historical, architectural, and archaeological resources. Use of the word may is inconclusive and should not be used to make decisions unless there is concrete data to support it.

Under the EA, the "setting" of the park is not identified with specificity. Moreover, it does not identify how much more damaging air tours are to the setting of the park compared to all the other activities in the park. I believe this section of the EA relies mostly on the "feeling" aspect of the park, which is completely perceptual. Throughout the section, the "feelings" of tribes and individual tribal members is emphasized. I believe that these feelings are cherry picked and not fully representative.

Furthermore, how will the noise of the air tour be detrimental to a tribes' ceremony that may be commencing? How will the visual effect of an aircraft intrude on the tribes' privacy whenever they are conducting their ceremony? These impacts are not demonstrated or quantified. The physical presence of people in the park represents a source of much greater impact, and Commercial Air Tours serve to lessen actual physical impacts.

Based on the analysis, air tours at worst have a significant impact on "feelings" as described by a select few who purport to speak for all, and no impact on "setting." As such, relying on section 106, this would not be enough to conclude that air tours have an adverse effect to the listed resources.

I believe that although the EA considers sacred sites, it technically should not carry that much weight when considering these types of resources under section 106. The number of meetings held with tribal interests is quite concerning, given that there are no tribal lands as defined by law associated with the ATMP planning area. I have initiated FOIA requests for this documentation as well.

During the development process prior to releasing the DRAFT ATMP, neither the FAA or NPS sought information from, or communicated with the operator. It was claimed in the June 1st "Public Meeting" that the agencies had coordinated with them. I am the operator, and absolutely there was zero coordination.

"For the purposes of this draft EA, the agencies assume that all lands within the Park have spiritual and sacred qualities and consider the entire Park a TCP."

None of the information in the EA cultural section results in a demonstrated impact. If air tours are removed from the ATMP area, all the same impacts exist if flights are flown outside of the ATMP area. Impacts could increase to sensitive cultural areas, as it seems they are not defined, and there is no requirement to define them. Mitigation becomes infinitely harder when the unknown is introduced.

I believe that if the cultural angle was a serious concern, the park shouldn't exist at all. Remove all of it. Using the same justifications to remove Commercial Air Tours, there isn't a single piece of park infrastructure that should exist. The elimination of air tours in the ATMP area does nothing to further the cultural cause of "Setting and Feeling". In fact, I would assert that the low impact nature of Commercial Air Tours could represent a decrease of impact to "Setting" as we never physically come in contact with any ground resource in the ATMP planning area. Tribal interests lack the authority or expertise to offer input on airspace issues.

Wilderness

While Wilderness is not an impact category the FAA traditionally examines, the Black Elk Wilderness to the south and west of the memorial is managed by the USFS, one of the participants in developing the ATMP.

The two qualities of the Wilderness character considered in the EA were "natural" and "solitude." A "natural" Wilderness is one where ecological system are substantially free from the effects of modern civilization--this quality is preserved when indigenous species and ecological processes are intact. And solitude is the ability for individuals to feel free, at peace, self-reliant, and able to observe landscapes without modern human effects.

Section 2(a) of the Wilderness Act states that Wilderness areas "shall be administered for the use and enjoyment of the American people in such manner as will leave them unimpaired for future use and enjoyment as Wilderness, and so as to provide for the protection of these areas, the preservation of their Wilderness character."

The EA determined that commercial air tours may impact the following qualities of Wilderness characters, including the opportunity for solitude, the natural quality, and other features of value (e.g., cultural resources). Further, commercial air tours can represent both a sight and sound of human activity and therefore detract from the solitude quality of Wilderness character.

The implementation of Alternative 2 would have a direct impact on the wilderness areas mentioned above by displacing current air tour traffic into these areas. By removing the air tours from the ATMP Planning Area and moving them deliberately into the Wilderness areas, the FAA and the NPS are increasing the impacts to these areas.

Furthermore, majority of the area considered the Wilderness is outside of the ATMP planning area. So, such an extreme response as the one in Alternative 2 will increase the impacts to the Wilderness, because operators will operate over the wilderness more frequently.

The best way to protect the Wilderness would be to enter into a Voluntary Agreement that could further offset flight paths from the wilderness areas and potentially increase altitudes of those routes in order to further mitigate impacts.

Visitor Use & Experience & Other Recreational Opportunities

The EA determined that air tours have a negative effect on visitors' experience because it impacts their ability to enjoy the scene, the acoustic environment of the park, and their engagement with the Park's interpretive programs. The EA further recognizes that the primary adverse effect comes from the noise that air tours cause.

I do agree with the EA that the noise of air tours may present limited impacts to a visitor's experience, however, such impact alone does not call for implementing Alternative 2. The EA recognizes that air tours offer a recreational experience for those who wish to view the Park from a different vantage point but fails to recognize the opportunity it provides to those visitors that may have some sort of impairment (including elderly visitors). Although the Park's major locations are accessible for impaired visitors, they are unable to enter the majority of the Presidential Trail and all of the Natural Trails. Air Tours would provide a low impact Alternative for these individuals.

Additionally, the EA assumes that, under Alternative 2, operators will continue to give air tours outside of the ATMP planning area. The probability of operators shutting down air tours (or increasing their prices to accommodate for fewer tours) is a possibility. In this case, it would limit the ability for those visitors with impairments to experience the park fully. In addition, it would eliminate the ability for visitors to view the Park from the unique vantage point that air tours provide and limit choices.

Environmental & Socioeconomics

Socioeconomic impacts of the Alternatives include the potential impacts commercial air tour operations have on two interest groups: 1) local residents living in close proximity to the Park, who may be affected by both the number of air tours and the manner in which they are conducted and air tour operators in South Dakota, specifically the air tour operators with IOA for the memorial and their employees, and the associated tourism industry.

The EA finds that environment justice (EJ population) within the study area may currently experience impacts from noise, air quality, and visual effects associated with air tours conducted within the ATMP planning area under current conditions. The EA further summarizes that the modeled impacts of Alternative 1 (no action Alternative) show that there are not disproportionately high and adverse noise, air quality, or visual effects to EJ population. This would then mean that Alternatives 3,4 and a Voluntary Agreement would also represent no adverse noise, air quality, or visual effects to the EJ population.

The EA does not adequately address the economic impacts to operators of Commercial Air Tours. The assertion that operators can simply repurpose their aircraft in other ventures is misguided and represents a lack of understanding in how helicopter operators' function, and the expenses they are exposed to when transitioning from one type of work to another. Aircraft, training, fuel, personnel, support equipment and other expenses are significant enough that air tour operators could be forced out of business.

The EA does not adequately address the economic impact to the community of Keystone because of the elimination of air tours. Should operators go out of business, it would have a direct effect on the town of Keystone. Only 17% of tourists stop in the town of Keystone on the way to mount Rushmore. The helicopter tour operators are a generator of dollars spent in the town of Keystone as a result of tourists coming into Keystone specifically for air tours.

Visual Effects

Visual resources include buildings, sites, traditional cultural properties, and other natural or manmade landscape features that are visually important or have unique characteristics. Impact to these visual resources and visual character relate to a "decrease in the aesthetic quality of the Park" resulting from air tours.

Like other aspects of the EA, visual effects are lacking in a description of actual impact. The way that the routes are currently flown, I do not see where a visual impact to the main featured views from any of the viewpoints in the park could be. Flights outside of Commercial Air Tours, illegal drone activity in the park and other aircraft would pose a greater impact to visual resources. We fly to the east of the road, as to not interrupt the views of the sculpture to the west. Even though the helicopter does not block or obstruct visitors' views of the sculpture, the EA found that its' mere presence contrasts the natural scenery. I believe characterizing a sculpture cut into the mountain and a parking garage hardly qualify as natural scenery.

The best way to assure visual impacts are minimized would be through the adoption of Alternative 1,3, or 4 or through a Voluntary Agreement that allows all participants to have a say in the formulation of routes to minimize perceived impacts.

Conclusion

Both Mt. Rushmore and Badlands' EA are eerily similar in scope and content. The two park units could not be more different in size, scope, and environment. This is more evidence that the process is rushed and haphazard in its approach. Many of the analysis appears to be "cut and paste" to save time and effort.

The EA for Mt Rushmore discusses how air tours "could" or "may" adversely affect each section analyzed in the EA report. Furthermore, each Alternative has its own downsides and benefits. It appears that Alternative 2 was chosen simply because it eliminates air tours within the ATMP as driven by the agenda of the NPS.

However, the EA does not give any real consideration to what "could" or "may" happen if air tours outside of the ATMP planning area increase due to Alternative 2 being implemented in final form.

The best solution for all parties, which could ensure that concerns were addressed, and the unknowns could be documented and controlled, would be to enter into a Voluntary Agreement. This would allow Air Tours to be limited and could potentially provide an avenue for operators to voluntarily restrict flights outside of the ATMP, and voluntarily limit nonregulated flights into the ATMP area. Outside of this Agreement, I believe Alternative 2 will result directly in additional impacts that would exacerbate the impacts at the pa

Correspondence ID: 250Project:97377Document:128168
Name: Schlueter, Rio E
Received: Jun,20 2023 20:03:03
Correspondence Type: Web Form
Correspondence: An amazing experience to appreciate the beauty of the monuments. Noise isn't bad and not excessive in the park

Correspondence ID: 251Project:97377Document:128168
Name: Fitch, Ken
Received: Jun,20 2023 20:10:22
Correspondence Type: Web Form
Correspondence: Mt. Rushmore National Memorial inhabits a special place for many peoples, and the NPS perspective here does represent appropriate respect and understanding.

It has been an ongoing source of tension that the National Memorial is located in the Black Hills that, as stated, is one continuous landscape with significant sacred qualities and cultural significance to the tribes who have deep connection to this area.

The cosmological dimension of the sky is ever present in spiritual and cultural understandings and practices.

The intrusion of commercial air tours in this realm becomes an act of disrespect and sacrilege that efforts at mitigation do not address.

The mere mention of air tours near this iconic national feature brings immediate despairing wonderment. Why would we facilitate the entry of these airborne conveyances to the vicinity of a national symbol that would be a prime target for terrorists !

Indeed, the appearance of such would generate intimations of potential disaster familiar from cinematic visions of such, with many a visitor considering whether the aircraft was arriving as a potential attack conveyance for disaster.

The National Memorial is also a work of art and engineering designed to be viewed from below as honoring those depicted on the summit, persons we should look up to.

A view from above belittles the intent here.

If this were to be a desirable enterprise, then should we not bring ladders and a lift device into the Lincoln Memorial so visitors could come in and climb a ladder or be elevated to look directly in Lincoln's eyes, or even from the ceiling heights to look down on him.

The termination of the air tour flights is appropriate.

Correspondence ID: 252Project:97377Document:128168

Name: ,
Received: Jun,20 2023 20:16:54
Correspondence Type: Web Form
Correspondence: I recently went for a helicopter tour and our pilot was Austyn Schlueter. He was amazing! The best helicopter ride I have been on! Very professional and knowledgeable on the history of everything I flew over.

Correspondence ID: 253Project:97377Document:128168
Name: Schlueter, Michael E
Received: Jun,20 2023 20:19:26
Correspondence Type: Web Form
Correspondence: Austyn Schlueter is a very qualified helicopter pilot. In addition to his Pilot college at University of Grand Forks Aerospace he also completed an instructors course and worked for the University as an instructor! His completion of these courses and hours of flight are only a small insight of his abilities! He is a great people person and can explain things in a calm and intelligent manner! He will be a great asset to any place he chooses to continue his career! Thank you mike.

Correspondence ID: 254Project:97377Document:128168
Name: Schreier, Cheryl A
Received: Jun,20 2023 20:23:07
Correspondence Type: Web Form
Correspondence: Thank you for the opportunity to comment on the draft Air Tour Management Plan (ATMP) and Environmental Assessment (EA) for Mount Rushmore National Memorial (MORU). I commend the National Park Service (NPS) and Federal Aviation Administration (FAA) for thoroughly analyzing the public scoping comments in creating the alternatives for the draft ATMP. Also, for in-depth tribal consultation which is significant in itself to ensure natural and cultural resource impacts were identified and mitigation addressed within the Preferred Alternative.
Also, thank you to the NPS and FAA for hosting a virtual public meeting on June 1, 2023. The virtual meeting was very informative and advantageous in responding with comments for the draft ATMP and EA.
First of all, as the previous Superintendent of Mount Rushmore National Memorial (2010-2019), I worked closely with NPS Natural Sounds and Overflights team, FAA and the air tour operators providing tours of MORU. During my tenure we were working on Voluntary Air Tour Agreements for MORU and Badlands National Park (BADL). For over twenty years the process to prepare and implement air tour management plans in coordination with the FAA has been a slow, ever changing, evolving and challenging, as it was for MORU and BADL. Air tours were always one of the most invasive, distracting activities at MORU during the main visitor season from May through October. There were many visitor complaints pertaining to the overflights at the park.
I am extremely supportive of the Preferred Alternative as identified in Chapter 2, Section 2.5. The prohibition of air tours over MORU within ½ mile of the park's boundary below 5,000 AGL is a very desirable alternative to protect the significant natural and cultural resources of MORU, tribal resources and values, visitor experience and wilderness character. The fundamental resources and values were identified in MORU's 2015 Foundation Document which includes the "Natural Setting" and natural soundscapes. The noise from air tours significantly impacts the visitor experience, interpretive programming and special events held at MORU.
As stated in the FAQ section of supporting documents, air tour operators will still be able to offer air tours outside of the ATMP planning area and provide their guests with an air tour experience without significant impacts to MORU. Thus, the number of flights or operators would not be impacted by the Preferred Alternative. The justification that air tour operators provide an accessible experience for visitors with disabilities, elderly, less mobile or the very young to see Mount Rushmore National Memorial is not a valid reason to continue to allow overflights to occur within the boundaries of the park. In the last several years, MORU has invested millions of dollars to improve accessibility to all park visitors whether it is at the park itself or through electronic resources (off and on-site).
The Preferred Alternative is the optimal choice to preserve and protect the incredible, irreplaceable park resources and provide outstanding visitor experiences for current and future generations.
Respectfully submitted,
Cheryl A. Schreier

Correspondence ID: 255Project:97377Document:128168
Name: Baca, Nick
Received: Jun,20 2023 20:26:11
Correspondence Type: Web Form
Correspondence: Please keep the helicopter tours over Mt. Rushmore! It's important to appreciate the land from afar to preserve the sacred land!

Correspondence ID: 256Project:97377Document:128168
Name: Sippel, Kaytie
Received: Jun,20 2023 20:30:34
Correspondence Type: Web Form
Correspondence: The helicopters should stay!!

Correspondence ID: 257Project:97377Document:128168
Name: ,
Received: Jun,20 2023 20:33:03
Correspondence Type: Web Form
Correspondence: The helicopter tours give us such a unique opportunity to view one of our nation's monuments from a different perspective. When we were out in the area, we weren't bothered by any helicopter noises. The area was very clean and well kept.

Correspondence ID: 258Project:97377Document:128168
Name: Baca, Deborah H
Received: Jun,20 2023 20:40:01
Correspondence Type: Web Form
Correspondence: What a wonderful experience while on vacation a helicopter ride over the monuments and beautiful landscape. Taking my new grand baby and family on a flight they totally enjoyed. Quiet and so exciting at the same time. Thank u to yr state and our priceless adventure and are coming back for another vacation there next month and worth every penny and do it all again. South Dakota rocks with helicopter and other tourism. Priceless.

Correspondence ID: 259Project:97377Document:128168
Name: ,
Received: Jun,20 2023 20:48:08
Correspondence Type: Web Form
Correspondence: Helicopter tours are low impact, not littering, not harmful to the ground and are relatively quiet compared to motorcycles and other motorized vehicles. They are a wonderful addition to the tourist experience that is Mount Rushmore and the Badlands and should not be taken away.

Correspondence ID: 260Project:97377Document:128168
Name: ,
Received: Jun,20 2023 20:49:24
Correspondence Type: Web Form
Correspondence: Helicopter tours are low impact, not littering, not harming the ground and relatively quiet compared to motorcycles. These tours also draw in a large amount of people every year to your state and cities who want to get a better view of Mount Rushmore from the sky. It would be harmful to everyone to get rid of a huge tourist attraction for something that has minimal impact on the ground or sound levels.

Correspondence ID: 261Project:97377Document:128168
Name: Smith, Sherry Bea B
Received: Jun,20 2023 21:16:44

Correspondence Type: Web Form

Correspondence: The proposed limitations on frequency and altitude of the helicopters used for tours of the Black Hills including Mt. Rushmore are welcomed. I camp and hike within the Black Hills and the intrusion of noise from the helicopters conducting tours is quite disconcerting and certainly negatively impacts the ability to connect with nature and appreciate the natural beauty and serenity of the Black Hills. Thank you.

Correspondence ID: 262Project:97377Document:128168

Name: , A

Received: Jun,20 2023 21:51:31

Correspondence Type: Web Form

Correspondence: As one of the cooperators (aka - tour operator) who has conducted aerial tours over Mt. Rushmore and Badlands national parks since before Congress mandated the ATMP development, I believe this proposed plan has nothing to do with Managing Air Tours but is a "CEASE AND DESIST PLAN". Our fixed-wing air tours have the lowest impact of any park visitation. We require no infrastructure support, no roads or trails, no erosion, no garbage removal, nothing!

As for the Northern Plains Tribal opposition to Air Tours.... in recent years they have been against everything that does not Bolster their Coffers, that's a fact.

The vehicle and foot traffic, as well as construction activities to support this, are certainly more devastating to any endangered species than my single engine, fixed-wing aircraft flying by at 1,500 - 2,000 AGL, which quite often can't even be heard above the roar of motorcycles, trucks, etc.

If we really want to protect the parks, maybe you want to consider closing all access! This is beyond ridiculous.

We have provided countless tours in the past to individuals with various handicaps and physical challenges who would have had no other option to enjoy "OUR" National Monuments and Parks.

We have conducted our tours in a professional and responsible manner since before congress acted back in 1999. We have had no accidents or incidents and never received notice of any complaints or concerns.

I'm not trying to be unreasonable, however I believe this preferred alternative, "No Tours", is way beyond what congress had in mind. This will have a detrimental effect on many families in this area who have acted responsibly and will now be out of business.

Sincerely,

Eagle Aviation, Inc.

Correspondence ID: 263Project:97377Document:128168

Name: ,

Received: Jun,20 2023 22:03:30

Correspondence Type: Web Form

Correspondence: Having rides through the area via helicopter gives such a new perspective and appreciation for what is below us. Envisioning going up during a life event or with a family member for the first time is exactly why tours like this are kept. Losing the ability to see the sunset over the mountains while up in the air would be a waste. Not to mention that looking at the photographs taken, it would eliminate a lot of tourism to the area.

Correspondence ID: 264Project:97377Document:128168

Name: Manning, Treg

Received: Jun,20 2023 22:33:09

Correspondence Type: Web Form

Correspondence: I write to you today on behalf of Airbus Helicopters to echo the comments of Helicopter Association International and other industry stakeholders in opposing the draft ATMP for Mount Rushmore National Memorial Park. We disagree with the elimination of Interim Operating Authority (IOA) and urge the National Park Service (NPS) and the Federal Aviation Administration (FAA) to do more due diligence to determine the true impacts to the environment, operators, the public, and parks resources of this proposed reduction in flights in the ATMP process.

According to the NPS documents, from 2017-2019, an average of 3,914 commercial air tours occurred over Mount Rushmore

National Memorial Park per year. This draft ATMP would prohibit commercial air tours within the ATMP boundary over the National Memorial Park.

We encourage the NPS to reach out to the operators to determine the economic impacts of implementing a management plan that so severely restricts overflights. This plan will significantly impact the local tourism economy.

At Airbus, we are committed to reducing the sound levels of our helicopters to ensure they are smoothly integrated into citizen's everyday lives. Complying with existing industry-wide sound regulations is no longer enough: our goal is to go beyond them. Therefore, we continuously look at ways to make our rotorcraft even quieter and invest in technologies to do so. Today, our H130 (predominantly used by tour operators), H135, H145 and H160 helicopters are industry-wide benchmarks for low sound levels in their respective classes. While the ATMPs do real economic harm to the operators, we are also concerned about the impact on visitors who choose to experience the National Parks by aerial sightseeing.

As we move past the pandemic years, many National Parks such as Mount Rushmore National Memorial Park saw their resources strained by the large number of visitors as the public began to travel again. Air tours are an important option for many visitors conducting a once-in-a-lifetime trip to see famous natural landmarks. Visitors taking advantage of air tours benefit by avoiding traffic, wait times, and walking trails that are inaccessible for the disabled or elderly, while reducing congestion and demand on park infrastructure.

The National Parks should be available for all visitors to see. Limiting flights over the park unfairly limits the elderly, very young, handicapped, and others to experience the park. Limiting flights over the Parks is discriminatory to those who might not have the time, resources, or physical ability to see the park any other way.

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

By prohibiting an already limited number of allowable air tours, we are reducing opportunities to access our parks in a way that leaves little to no environmental footprint or disturbance. Through carbon-offset efforts and strict altitude requirements to control noise - just to name a few efforts - air tour operators are working to ensure they are responsible stewards of the nation's parks. There are currently no restrictions or mitigation efforts for loud vehicles operating in the park, some of which make more noise than a passing helicopter.

Undoubtedly it is essential to preserve the National Parks, yet still enable visitations for all to enjoy. Airbus opposes the draft ATMP. Commercial air tour operators and industry partners, such as Airbus, would welcome collaborative engagement with the FAA, NPS, and all interested parties to benefit the park and the visitors.

Sincerely,

Treg Manning

Correspondence ID: 265Project:97377Document:128168

Name: McKenzie, Tom

Received: Jun,20 2023 22:34:44

Correspondence Type: Web Form

Correspondence: I can't express enough the implications of banning helicopter tours around the Mount Rushmore/national parks area. These tours provide a minimally invasive alternative to seeing one some of Americas greatest achievements and wonders as they allow spectators to view such destinations from a different perspective while minimize crowding within the parks. It also reduces the footprint and littering within such areas as they and confined to the interior of the aircraft. It also stimulates the local economy by enticing visitors with a different means by which they can visit the park and might be the only alternative for prospective visitors with physical ailments. Overall I believe helicopter tours should remain within the National parks/Mount Rushmore area.

Correspondence ID: 266Project:97377Document:128168

Name: NA, NA

Received: Jun,21 2023

Correspondence Type: Petition

Correspondence: National parks are places I go to appreciate scenery and history, watch wildlife, and enjoy interpretation. I agree with your recommendation to prohibit noisy air tours over Mt. Rushmore National Memorial and Badlands National Park.

For both park units, commercial air tours have been flying directly over areas where most visitors gather to enjoy each park.

Air tours are in direct conflict with interpretive tours, and in Badlands they shatter the wilderness experience.

Wildlife, including eagles, peregrine falcons, bison and bighorn sheep are impacted by noise generated by air tours. Current air tour operations disturb the Park's wildlife and result in changes to behavior that could negatively impact their survival.

We go to national parks to get away from the hustle and bustle of our everyday lives--to appreciate nature and learn about our history. Noisy air tours should not be allowed to ruin visitor experiences and harm wildlife. We support your recommendation to eliminate them in Mt. Rushmore National Memorial and Badlands National Park.
