Dear Superintendent Creachbaum,

RE: Air Tour Management Plan (ATMP) for Olympic National Park (Park)

Olympic Park Advocates (OPA) greatly appreciates this opportunity to comment on the Air Tour Management Plan (ATMP) for Olympic National Park (Park). OPA was established in 1948 to protect the wilderness and ecological integrity of Olympic National Park and the Olympic ecosystem.

As stated in the announcement, Congress developed the National Parks Air Tour Management Act of 2000 out of concern that noise from tour aircraft could harm national park resources and experiences for visitors. OPA shares that concern.

OPA has several concerns regarding the process for developing the ATMP. 1) there needs to be an environmental impact statement following NEPA regulations; 2) there is no provision for a “no air tour alternative” over Olympic National Park; 3) “the Act requires the agencies to publish the proposed plan for notice and comment and hold at least one public meeting.” OPA argues more information and thought is needed before sanctioning this plan. Therefore, more meetings will be needed.

While the proposed plan is a reduction in the number of flights now allow without a plan, the lack of a NEPA DEIS cannot be excused. Actions by an agency that affect the environment needs to go through the NEPA process. If we are to save and understand our environment, all activities must be studied. EIS documentation cannot be based on assumptions. NEPA procedures were designed to increase our knowledge by forcing a rational and studied examination of natural and human activities. NEPA is not a problem to overcome. It is an opportunity to learn and to survive better into the future.

Therefore, OPA asks that a proposal be drafted using more extensive NEPA procedures. That the NEPA procedures include a “no air tour alternative” option. That environmental concerns be included in the plan and the “facts” stated are verifiably proven.

OPA is disturbed by the statement in the ONP web announcement, “Two federally threatened/endangered species are present in the project area. The NPS and FAA have begun informal consultation with the United States Fish and Wildlife Service (USFWS) and anticipates a determination of may effect, not likely to affect marbled murrelets and no effect on northern spotted owls.” This statement indicates there has been a pre-determination of the results without the facts proving their accuracy.

Furthermore, it only mentions two species of concern. The Park is host to endangered (Gray wolf – eliminated by the 1920s, Humpback whale, Blue whale, Finback whale, Sperm whale, Sei whale, Short-tailed albatross) and threatened (Northern spotted owl, Western snowy plover, marbled murrelet, Bull trout, Puget Sound steelhead, Salmon: Ozette Lake sockeye, Puget Sound chinook, Hood Canal summer chum) species. These need to be addressed with more than an “informal consultation” with US Fish & Wildlife. Not being considered is the possible human and animal toll taken on the not yet threatened and endangered such the Roosevelt elk.

OPA opposes all flights over the Park and the contiguous wilderness areas that can disrupt the natural experience of people and animals in the Park. Airplane noise, regardless of decibels, is not a natural experience. While small plane noise may not generate the decibels of the growler Navy jet to which OPA vigorously objects, in the place designated as the quietest spot in the U.S. outside of Alaska (Olympic National Park’s Hoh Rain Forest), it is an unnecessary, distracting and disturbing annoyance to people and animals.

For example, the Act applies to areas within and 1/2 mile outside of the park, and to elevations below 5,000 feet above ground level (AGL). This means that The Washington Island National Wildlife Refuges which is contiguous to the Park, must also be considered in this proposal. As stated in the Aug 25 presentation a letter was sent to the refuge announcing this draft proposal. Will the time be taken to determine if this proposal will help or hinder the problems the refuge already has?
There is already a problem of small plane disturbance in and around wildlife on the Olympic Peninsula. As stated in the Washington Islands National Wildlife Refuges Comprehensive Conservation Plan and Environmental Assessment, 6-14-2007, we found the following, “wildlife disturbances from aircraft overflights” [p. 1-3]

“low-flying aircraft (under 2,000 feet [610 m]) over islands or coastlines; and disturbances to marine mammals, turtles, and seabirds (15 C.F.R. ' 922.152). The intended effect of these regulations is to protect the biological, recreational, ecological, and historical qualities of the Sanctuary (NOAA 1993). [p. 1.11]

“Disturbance is a larger issue from the air, with helicopters and other aircraft flying low over seabirds and marine mammal areas. Biologists, NPS staff, and conservation groups have all brought attention to the incidences of overflight disturbances to wildlife on refuge islands. Overflight disturbances disrupt seabird and marine mammal breeding and resting activities. Currently, there is a Federal Aviation Administration (FAA) advisory and Sanctuary regulation that requires a 2,000-foot (610 m) minimum flight altitude for aircraft flying over the islands. However, this regulation is difficult to enforce due to the remote nature of the region and is often violated. For the CCP, this issue will overlap with interagency cooperation, as work with NOAA and the FAA will be needed to address this concern. [p. 1-22]

“Currently, the Sanctuary has established a minimum flight altitude of 2,000 feet (610m) for aircraft flying over the islands. The FAA is the enforcement agency of the aircraft industry. To maintain a minimum overflight altitude over the Refuges, the FAA needs to support the policy. This objective encourages bringing these two agencies to the table to discuss the issue and develop ways to prevent overflight disturbances. [p. 2-13]

“Aside from water-based recreational use, there are also a small number of private and commercial aircraft that fly over the Refuges to sightsee and observe wildlife. All aircraft are requested to remain above 2,000 feet (610 m) when flying over any rock, island, or reef. It is anticipated that some wildlife have been disturbed by watercraft or aircraft that venture too close to the islands. Low overflights are documented each year by the NPS; however, it is extremely difficult to obtain the information necessary to contact these individuals (NPS 1981). [p. 3.32]”

OPA argues that there are already problems with low flying aircraft within the area being considered by the Air Tour Management Plan (ATMP) for Olympic National Park.

Because 95% of Olympic National Park is designated wilderness and there are wilderness areas contiguous to the Park, OPA membership is concerned about maintaining the Park as a place where wilderness is respected.

“A wilderness, in contrast with those areas where man and his works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammeled by man, where man himself is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man’s work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation;...” [Wilderness Act 1964]

A place where people can go and are able to destress from the noise of civilization. The existence of wilderness brings multiple values and uses to all citizens of the United States even while living miles away.

Wilderness brings cleaner air and water; a place for animals far better than a zoo; a place where nature works mostly according to nature’s rules; and the diversity of plants, fish, and animals that comes from a creation not weeded by humans. It becomes a library and laboratory for us to learn from the process’s nature produced to provide for our survival. Most of our medicines have been synthesized from nature.

Even with all these values, wilderness can be a place where we can go and enjoy appropriate recreation. Appropriate in that our activities don’t damage its ability to provide its other gifts. As we can see, earth’s wilderness is a valuable, integrated, multiple-use resource. Therefore, OPA argues that the loss of tour overflights would be a negligible loss compared to the other values provided to the people of the United States and the world by a quiet wilderness.
While it may appear to us that noise is transient, many studies indicate that it is disturbing to human minds and bodies. Just because studies have not been done to assess the effects of noise on animals does not mean there are none. We just fail to know it. However, based on the observations in the Washington Islands National Wildlife Refuges Comprehensive Conservation Plan and Environmental Assessment, harm is being done to the birds and mammals in the refuge because of flights of small aircraft over the refuge. We know noise has significantly affected the human mammal, why not other mammals.

Visitors to the Park seeing airplanes flying over them can only assume that flying over the Park and its immediate environs is allowed. Sixty years ago, while camping on the beach at Point of the Arches, I witnessed a small plane land on the beach, two men got out, dug several burlap bags full of clams, and flew out. The Washington Islands National Wildlife Refuges Conservation Plan shows the lack of understanding the public has of what endangers our environment. We now have the opportunity to strengthen our natural environment, to increase our nation’s mental health by reducing the unnatural noises and activities in only 5% of our land.

Using “Star Wars Canyon” on the western edge of Death Valley National Park for navy training was an exhibition of bad judgement by the military. The crash of a F-18 jet, in 2019, that killed the pilot and hurt seven park visitors shows, while very sad, the unintended can happen. Is the Navy using Olympic National Park as the place to train when it has been doing that training for years out of military bases in Idaho and Nevada a good idea? The current Navy training over Olympic National Park increases the opportunities for physical harm and noise damage to people on the Olympic Peninsula and Olympic National Park.

With 64 flights carrying about 4 people is allowing 250 people to intrude on the peace and quiet of the other 2,500,000 visitors. It exposes them and the park to possible mishaps that are unnecessary. Is flying a few people a day over the wilderness the most important use of Olympic National Park? OPA would argue that protecting its wilderness, all of its critters, and visitors are the most important.

Our National Parks were created to preserve our national treasures. They are there because they are unique. 95% of the United States is not designated wilderness and therefore available to air traffic at any legal height. OPA would argue that the unique qualities of our National Parks and especially wilderness National Parks need to be protected from human activity that changes its uniqueness. If we are to err, let it be saving too much wilderness. It is impossible for us to recreate the wilderness lost and do it according to nature’s specifications.

OPA looks forward to a proposal using more extensive NEPA processes for an Air Tour Management Plan (ATMP) for Olympic National Park.

Sincerely,

Donna Osseward, President,
Olympic Park Advocates,
6751 12th Ave. SW, Seattle, WA  98106
206-949-7020