United States Department of the Interior

NATIONAL PARK SERVICE
Hawai'i Volcanoes National Park
Post Office Box 52
Hawaii National Park, Hawai'i 96718

IN REPLY REFER TO:
HAVO I.D. (L7621)

March 27, 2012

Mr. Ron Terry
Geometrician Associates
PO Box 396
Hilo, HI 96721

Dear Mr. Terry:

Thank you for your letter dated 02/23/2012 requesting comments on the Draft Environmental Assessment for the proposed Helicopter Landing Area at Royal Gardens. Many of the comments we provided on 11/21/2011 in response to public scoping were addressed, but a few issues remain. As a neighboring land owner to the subject property, and as the agency charged with the protection of natural and cultural resources of Hawai'i Volcanoes National Park for enjoyment by future generations, we submit these comments.

It is unclear if the Special Permit will still be sought since Mr. Thompson's home has since been covered by lava. If the Special Permit will be pursued, a survey should be required to ensure that the landing area is correctly sited on the subject property since boundaries will now be hard to distinguish. In addition, the survey will need to be completed to ensure that the passengers do not come into the park if Paradise Helicopters is not applying for a Commercial Use Authorization (as described in detail in the 11/21/2011 letter).

The map on page 2 depicts an arrow that incorrectly identifies the proposed landing site as being within the park boundary. In addition, the map on page 8 appears to have the western portion of the route and the house as fully within the park boundary. This may be due to the age or scale of the map, but based on landmarks of Kamokuna and Wahaula and the inaccurate dashed line for the park boundary, the western portion of the route and the house needs to be shifted to the east. Please correct these two maps for the Final Environmental Assessment.

Page 26 of the EA requests information on mitigations and potential effects. Information provided previously on the Air Tour Management Plan and Environmental Impact Statement (ATMP/EIS) is one source of potential mitigations. In addition, the NPS just completed public scoping on a Mission Critical Administrative Aviation Plan/Environmental Assessment to evaluate and document any potential impacts of the park's administrative aviation operations. To this end, park staff and partners have started working on a plan that will provide internal park guidance for utilizing aircraft to conduct our work where necessary. This plan will formalize best management practices, define sensitive areas to avoid, and include mitigation measures to reduce any potential impact of the park's operational use of aviation. It is important to note that administrative use of aviation in the park is a very small amount compared to the number of air tours being addressed under the ATMP. These park administrative aviation operations are conducted for public safety and health and for resource protection and restoration. Administrative use of aircraft allows park staff and cooperators to accomplish these activities in a safe, timely, and efficient manner while minimizing the impacts to the park's natural and cultural resources and the visitor

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experience. The level of administrative use is much less than commercial air tour operations and the administrative use is more dispersed across the landscape. More information will be posted on our website as we develop the Mission Critical Aviation Plan/EA, http://www.nps.gov/ havo/ parkmgmt/plan.htm.

As stated in our previous letter, Congressional and National Park Service (NPS) concerns regarding the impacts of over flights on the national parks led to passage of the National Parks Air Tour Management Act (NPATMA) in 2000. The National Park Service has been working with the Federal Aviation Administration (FAA) to develop an ATMP/EIS for commercial air tour activities within the airspace of Hawaii Volcanoes National Park for 5,000' agl and below including a ½ mile buffer zone beyond park boundaries, in order to mitigate or prevent the significant impacts of commercial air tour operations over the park. We are concerned about the precedence of allowing a helicopter landing pad within the ½ mile buffer prior to the completion of the ATMP.

On page ii, the last paragraph inaccurately portrays the NPS role in helicopter tour noise abatement. The ATMP will only regulate air tours within the airspace of Hawai`i Volcanoes National Park for 5,000' agl and below including a ½ mile buffer zone beyond park boundaries, as the planning area for the ATMP. Recent public comments on the ATMP preliminary alternatives revealed the dissatisfaction of local residents currently residing under flight paths of local air tours. The flight patterns and altitudes of air tours outside of the designated ATMP planning area are regulated by the FAA. In addition, it is the responsibility of the FAA, the state, and the air tour industry to work with communities regarding noise impacts that are outside the ATMP planning area. The final flight routes adopted in the ATMP/EIS will specify routes for commercial air tour travel over park lands including the park's ½ mile buffer and will incorporate any possible noise reduction model, noise avoidance or state noise abatement program recommendations for residential areas impacted by egress/ingress routes to and from the park airspace.

The NPS recognizes that the commercial air tour industry is important to the economy of Hawaii but also believes that the tourism industry benefits from the continued protection of the superlative resources of its national parks, unimpaired (Federal Register Vol. 59, No. 52). Paradise Helicopters is allotted 1,684 flights per year under the Interim Operating Authority of NPATMA. While helicopter tours do provide visitors with a unique experience, the acoustic footprint or noise impact is very different between an air tour traveling overhead at altitude compared to a helicopter landing that occurs multiple times per day. Noise levels of a single air tour can range from 50 to 87 decibels, depending on height above ground level, while the noise of landing and take-off is up to 120 decibels. Sound levels above 60 decibels begin to interfere with close range conversational speech.

Over a 25 year period, the park has experienced concentrations of visitors, geologists, and NPS personnel on the ground at lava viewing and monitoring sites and in areas offering access to the lava. Crowds of visitors on trails, at parking areas, and at viewing areas average 1,000-3,000 when lava is present. Scientific equipment that is essential for volcanic monitoring is also located in these areas. Current noise issues include aircraft noise interference with scientific equipment data collection, interference with on-the-ground conversation and radio use, and interference with hearing sounds associated with volcanic activity, essential for visitor and staff safety.

The National Park Service manages park soundscapes or "natural quiet" as a park resource, which is based on public law and is defined in NPS policy. In 2007, park studies revealed nearly two-thirds of surveyed visitors rank the ability to hear natural sounds as important to their enjoyment and appreciation of the park and three-quarters of these visitors equate annoyance and negative feelings with human-caused sounds including aircraft and vehicle noise (2007. Social Science Research to Inform Soundscape Management, Steve Lawson, Department of Forestry, Virginia Polytechnic Institute and State University).

The island's large expanses of lava produce landscapes that offer little sound shielding, creating long "time audibles" for human or mechanized sounds. From preliminary acoustic modeling (USDOT, Volpe National Transportation Center 2008), air tours on the Pu`u O`o boundary are audible for 10-15 minutes for 5-10 miles on either side of the flight track. In these areas, noise has the potential for creating an acoustic impact on humans and wildlife.

The Helicopter Landing Area at Royal Gardens EA does not adequately address the cumulative impact of noise/impacts to the soundscape from helicopter tours, which include not just Paradise Helicopters but other companies as well. Paradise Helicopter tours do contribute to the cumulative noise impact. In addition, the increased noise and rotor wash from repeated take-off and landings will further increase the impact of noise on the area soundscapes.

The area within the park that borders your project is a section of 42,000 acres of parklands known as the Kalapana Extension. This section of the park is governed by specific 1938 legislation regarding its use by Native Hawaiians for fishing and homesteading and it is actively used for these purposes.

Visitors come to their national parks to experience the natural quiet and solitude. Park managers are charged with protecting natural and cultural resources, including park soundscapes as well as limiting activities that cause unnecessary noise or threaten the natural quiet.

We are concerned that the noise associated with repeated landing and take-offs will negatively impact the natural quiet of the park and feel that the increased noise is a significant impact to the area. We encourage you to further consider the direct and cumulative impacts of noise on recreational users, wildlife, cultural practitioners, and soundscapes. Mitigations could include items as described in the ATMP information previously provided.

Please ensure we are notified of all future actions related to the proposal.

Sincerely,

Cynthia L. Orlando
Superintendent

cc:
County of Hawaii Planning Department
Paradise Helicopters
State Historic Preservation Division