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August 26, 2010

Superintendent, attn: Ross Lake NRA Draft GMP/EIS
North Cascades National Park Service Complex
810 State Route 20
Sedro-Woolley, WA 90284

Re: Ross Lake National Recreation Area Draft General Management Plan and Environmental Impact Statement

Dear Superintendent Jenkins:

The Aircraft Owners and Pilots Association (AOPA) represents the general aviation interests of 410,000 members, more than two-thirds of the nation's pilots – including 12,061 of our members in the state of Washington. On behalf of our membership, AOPA is committed to ensuring the future viability of and general aviation access to our public lands and waters. To that end we submit the following comments on the *Ross Lake National Recreation Area Draft General Management Plan and Environmental Impact Statement* (GMP/EIS).

AOPA is opposed to the preferred alternative, Alternative B, because it severely limits seaplane access to the Lake by restricting seaplane activity to the extreme northern and southern reaches of Ross Lake. Anecdotal evidence provided to us by pilots who use the lake as well as NPS staff is that seaplane usage occurs on the average of 12 to 24 operations per year and that there is no history of complaints about seaplanes. Seaplane use of the recreational area has never been excessive and there is no data indicating a significant increase in use is likely over the life of the new management plan.

One of the consequences of limiting seaplanes to the north and south ends of the lake is the denial of access to seaplane friendly campsites. The best suited campsites are those with a north facing dock that protects the aircraft from the southerly swells on the lake. By not allowing seaplanes access to the central portion of the lake the number of campsites with north facing docks is dramatically reduced.

Seaplane pilots and visitors to the national parks recognize the need for all users to enjoy their experiences. Normal operating procedures for seaplane pilots include flying friendly to avoid creating disturbances by reducing power settings after takeoff, minimizing over flights and keeping a sharp lookout for other vessels and people on the water. These flying friendly procedures are also known as noise abatement procedures and are a voluntary way of ensuring that other visitors to the NRA are not excessively bothered by the sounds of normal seaplane operations. Seaplane pilots as well as land plane pilots overflying Ross Lake are asked to remain at least 2,000 above ground level while overflying charted National Park Service areas in accordance with FAA Advisory Circular 91-36, *Visual Flight Rules (VFR) Flight Near Noise-Sensitive Areas*. Incorporating these procedures in to the seaplane access policy would be acceptable and AOPA is willing to assist the NPS in working with other stakeholders to help craft sensible procedures.

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Normal seaplane operations while in the approach, landing and taxiing phases are made at very low power settings and do not generate a significant amount of sound. In fact, the phase of flight that generates the most amount of sound is during takeoff and studies show that the sound levels exceed the federally accepted residential noise threshold of 65 dBA day-night average sound level (Ldn) for less than 60 seconds. By that measure, Alternative B would restrict seaplane access to the lake because of less than half an hour of noise over the course of an entire year.

Even as NPS contemplates limiting seaplane access, we note that motorboats are currently allowed in both the front country and back country management zones according to Table 4-1 of the draft GMP/EIS. We suggest that since seaplanes operate on or near the water in a specific manner and for much shorter periods of time than motorboats, seaplanes should enjoy the same access as motorboats do under the preferred alternative. AOPA respectfully requests that change to the preferred alternative so that current seaplane access is maintained.

In summary, AOPA supports continuing the current access seaplanes have to Ross Lake and respectfully requests that the limitations on seaplane access contained in the preferred alternative be removed as they are the equivalent of swatting at a mosquito with a sledge hammer.

Thank you for the opportunity to provide comments on the draft general management plan and environmental impact statement. If we can be of further assistance please contact us at 301-695-2200.

Sincerely,



Gregory Pecoraro
Vice President
Airports and State Advocacy