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November 30, 2023

Mr. Erik W. Amend Regional Administrator, Great Lakes Region Federal Aviation Administration 2300 East Devon Avenue Des Plaines, IL 60018

Dear Mr. Amend,

As president of the Mackinac Island Cottagers Association, I am representing concerned residents of Mackinac Island, Michigan, regarding the recent introduction and increasing presence of helicopter tours over and around Mackinac Island. Earlier this fall, I presented a petition with about 140 names of cottagers and year-round residents at a meeting of the Mackinac Island State Park Commission (MISPC), requesting that the Commission not renew the contract with a helicopter tour company to operate out of the Mackinac Island Airport. You probably know that the Mackinac Island airport is located on Mackinac Island State Park (MISP) land and is operated by the MISPC. I also sent a cover letter and copy of the petition to the City of Mackinac Island.

The response I received from the MISPC was that they will discuss the renewal of the helicopter tour contract at their January meeting. The City of Mackinac Island responded that they have no jurisdiction over matters impacting the airport and tabled the discussion. Both entities felt that it is ultimately the FAA who has the authority to regulate air tours over and around Mackinac Island.

As I did further research, I was pleased to learn about the National Parks Air Tour Management Act of 2000. It appears that many national park sites have established Air Tour Management Plans (ATMP). While I understand that this act does not apply to air tours over a state park such as MISP, the model is a perfect one. ATMPs are designed to protect park's natural and cultural resources, Tribal sacred sites and ceremonial areas, and visitor experience while maintaining air safety. Consider these elements for Mackinac Island:

- MISP was established in 1875 as the second national park after Yellowstone. The federal
 government recognized Mackinac Island as a unique place. In 1895, it was turned over to the
 state of Michigan as its first state park when the main feature of the park, Fort Mackinac, was
 decommissioned and the soldiers were no longer present to maintain the park grounds.
- Mackinac Island is considered a sacred place by some of its past and present tribal inhabitants.
- Mackinac Island has many fragile natural features.
- Mackinac Island just celebrated the 125th anniversary of its ban on automobiles. The only modes
 of transportation are walking, bikes, horses, and carriages. There is also a ban on drones. Both
 bans were established primarily for horse safety as Mackinac Island is considered a horse haven.
- Mackinac Island, and thus the MISP, is known for its tranquility, natural beauty, horse culture, and historic nature like many, if not most, national parks.

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It seems that Mackinac Island and the MISP are perfect candidates for establishing an ATMP. Since state parks and associated properties are not part of the Act of 2000, I am requesting that the FAA consider establishing guidelines for such properties. I recommend the following elements of an ATMP for Mackinac Island.

- Air tours are not permitted to originate or land on Mackinac Island.
- Air tours must maintain an altitude of 3000 feet above ground level.
- Air tours must maintain a distance of 1 mile away from the boundaries of MISP.

Please note that residents of Mackinac Island do not object to regular airplane flights to and from our airport, and especially not the occasional emergency medical flight. Both are vital services for which we are extremely grateful. Repeated helicopter tours, however, because of the level and duration of the noise they exhibit, are an intrusion on the history and tranquility that has made Mackinac Island and its State Park a destination for more than 1 million visitors each year.

Please let me know what advice you may have, or steps that need to be taken to establish an ATMP for MISP and the entire Mackinac Island. Perhaps Mackinac Island can be the first State Park to employ an ATMP.

I am copying both the MISPC and City of Mackinac Island on this letter for information purposes and in hopes that a cooperative effort can be established for creating an ATMP for Mackinac Island. Like the ban on automobiles in 1898, the MISP and City of Mackinac Island worked together to maintain the ambiance of the island. I am hopeful that we can add the FAA to a new effort in 2024.

Thank you very much for your consideration.

Rici

Cc:

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