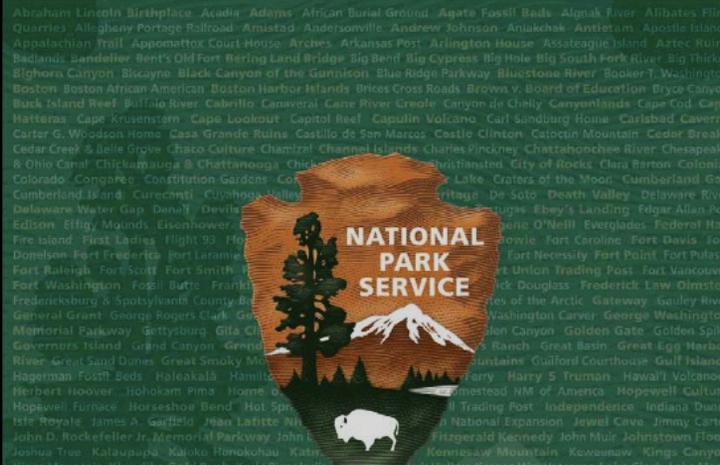# NPS Misrepresented and Concealed Acoustic Data
And Deceived the Peer Reviewers
of the Draft Environmental Impact Statement (DEIS) on DBOC
Part 1

Management Policies 2006

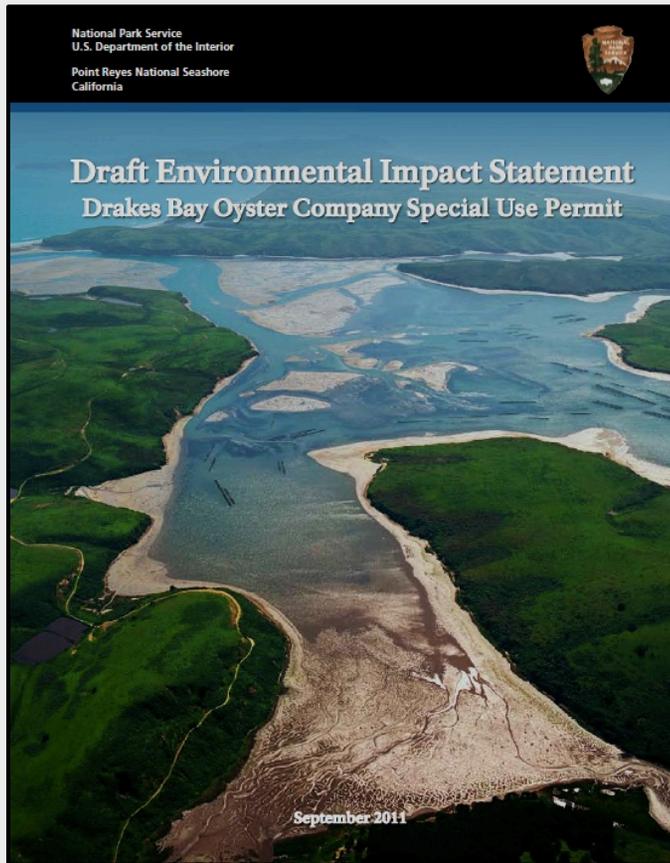NATIONAL PARK SERVICE

by Dr. Corey S. Goodman

1. Failed to follow NPS Management Policies 2006 and NPS Director's Order #47.

July 2, 2012

These slides are intended to supplement and not replace the written material.

1. Failed to follow NPS Management Policies 2006 and Director's Order #47.

1. Conclusions

The NPS DEIS on DBOC:

a) Cited Director's Order #47 and Management Policies 2006 as basis for soundscape analysis.

b) Were directed by these policies to identify noise-generating human activities, measure human-generated sounds, & measure baseline conditions.

c) Failed to measure DBOC noise generators and misrepresented ambient baseline conditions.

d) Produced soundscape analysis in DEIS that is different from other NPS EIS reports in that it did not measure human-generated sounds and did not follow NPS policies.

DEIS quoted Director's Order #47 in directing soundscape analysis

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"This Director's Order [#47] also directs park managers to measure acoustic conditions, differentiate existing or proposed human-made sounds that are consistent with park purposes, set acoustic goals based on the sounds deemed consistent with the park purpose, and determine which noise sources are impacting the parks (NPS 2000)."

NPS DEIS failed to follow policies concerning soundscape analysis

DIRECTOR'S ORDER #47: SOUNDSCAPE PRESERVATION AND NOISE MANAGEMENT

Approved:/s/ Robert Stanton
Robert Stanton, Director

Effective Date: December 1, 2000

Sunset Date: December 1, 2004

Table of Contents

A. Purpose and Background
B. Authority
C. Instructions and Requirements

   1. Applicable Policies
   2. Reference Manual
   3. Soundscape Preservation and Noise Manageme[nt]
   4. Interim Noise Management Measures
   5. Inventorying and Monitoring the Soundscape
   6. Establishing Soundscape Preservation Objectiv[es]
   7. Defining Impacts on Park Soundscapes
   8. Constructive Engagement
   9. Air Tour Management Planning
  10. Interpreting the Soundscape to Visitors
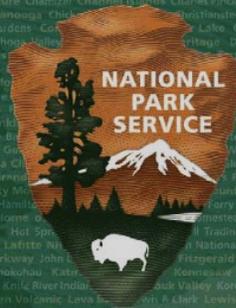 11. National Program Steering Committee

Director's Order #47 stated:
"It is these [human-made] *sounds and sound levels that need to be measured and evaluated in park planning processes to determine whether they are consistent with or destructive to soundscape management objectives."*

Directed park managers to:
"(1) measure baseline acoustic conditions …"

Management Policies 2006
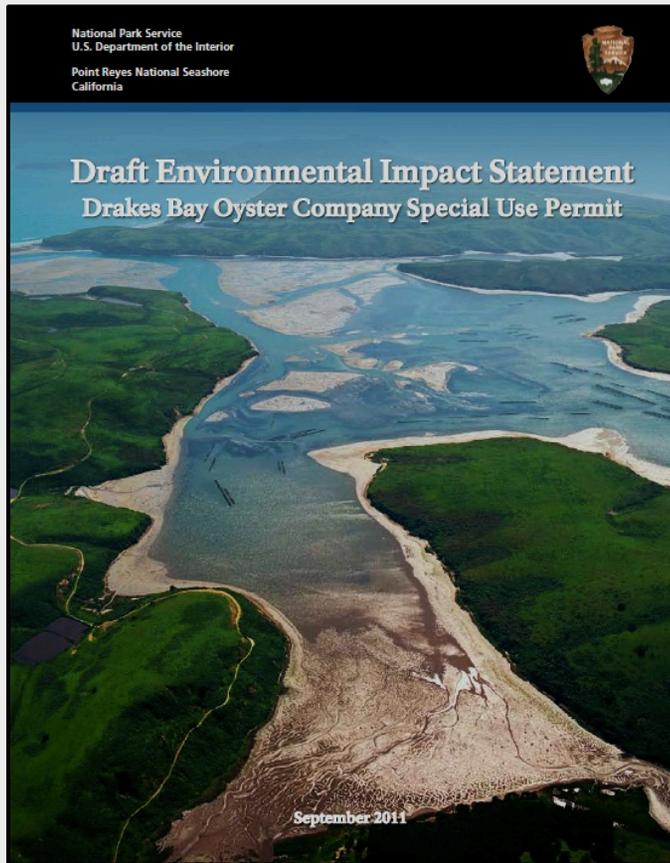
NATIONAL PARK SERVICE

The NPS Management Policies 2006 direct managers to monitor and evaluate the use of motorized equipment. It stated:

"Park managers will (1) identify what levels and types of sounds contribute to or hinder visitor enjoyment, and (2) monitor, in and adjacent to parks, noise-generating human activities – including noise caused by mechanical or electronic devices – that adversely affect visitor opportunities to enjoy park soundscapes."

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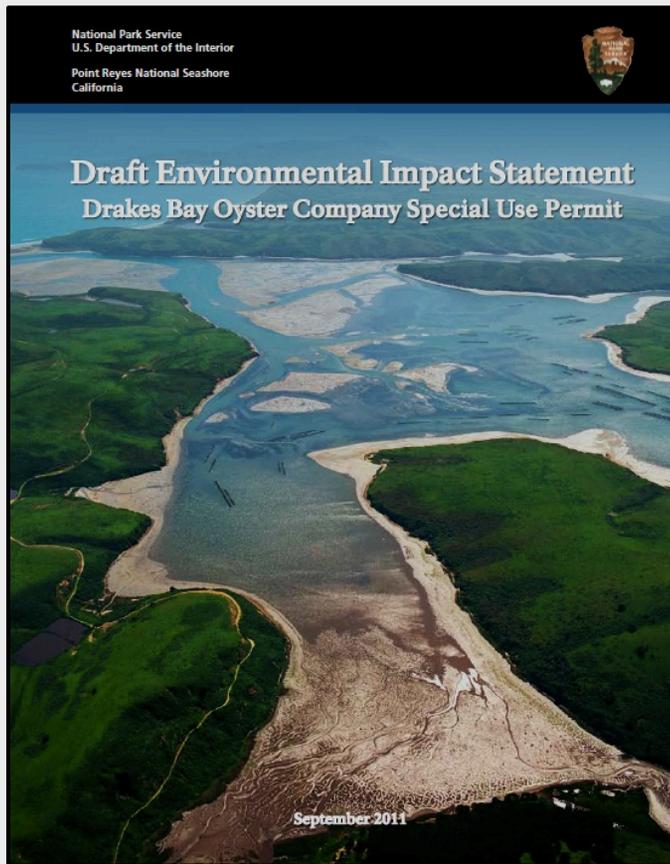
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See part 3

- Concerning the directive to monitor "*noise-generating human activities*" from DBOC, NPS failed.
- No data from DBOC noise generators are in the DEIS.
- Irrelevant data from loud, fast boats and highway construction equipment were substituted for DBOC boats and equipment.
- The peer reviewer was deceived to think data came from DBOC.
- NPS managers failed to follow Management Policy 2006 and Director's Order #47.

NPS ignored appropriate ambient sound level data from VOLPE 2011 report and instead used inappropriate ambient sound level data in DEIS

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See part 4

- VOLPE 2011 report addressed the issue of ambient sound level, reporting both L_{Aeq} and L_{50} levels.
- Although citing VOLPE 2011, NPS used an ambient sound level ("*lowest daily ambient level*") not used in VOLPE 2011 report.
- DEIS authors used a measure that apparently had not been used in other recent NPS EIS reports.
- While obtaining VOLPE 2011 report with appropriate ambient noise data, NPS instead used inappropriate sound data in DEIS.

NPS DEIS failed to follow policies concerning soundscape analysis