

Special Flight Rules Area in the Vicinity of Grand Canyon National Park Actions to Substantially Restore Natural Quiet Draft Environmental Impact Statement DES 10-60  
June 2011

The Grand Canyon Hikers and Backpackers Association (GCHBA) supports the DES 10-60 NPS Preferred Alternative.

The selected alternative, in our view, represents a difficult but fair compromise of competing interests. The recommended rules are soundly and reasonably based on the results of the Grand Canyon Working Group (GCWG) on overflights. GCHBA is able to support this finding as a well-informed participant in that process in a sincere effort to reach a consensus agreement, which was unsuccessful.

Both the conservation and air-tours interests took strong and irreconcilable positions throwing responsibility for finalizing Grand Canyon SFRA changes for restoration of natural quiet back to the Federal agencies. As an organization representing the recreational hiking community, rather than a purely conservation or commercial interest, we value compromise on this issue while seeking notable improvement in visitor experience for the wilderness areas of Grand Canyon National Park.

The NPS Preferred Alternative provides the following elements which are important improvements to the Park soundscape without placing undue burden on commercial flights and tours, or on private aircraft.

1. Seasonal respite for flight zones during off-peak periods – For backcountry visitors seeking natural quiet as an important part of their visit to rim areas, hiking trails, or river-running there will now be an option to choose a time and place where flight activities are substantially reduced.
2. Daily cap on tour flights -- Air-tour operators will have the capability to increase flights at certain times and places, but the new plan establishes operational limits during the peak visitation periods.
3. Reduced air-tour impacts in the Hermit Basin area -- Minor but helpful improvements to tour routes improve quiet in this area which is popular for above-the rim and below-the-rim visitors -- changes supported by most GCWG participants including air-tours.
4. Reduced air-tour impacts in the Nankoweap and Saddle Mountain areas -- Significant improvements moving flights away from important natural and recreational resources -- these changes also supported by most GCWG interests including air-tours. Also important to note that observations and comments from the hiking community show that some helicopter tour operators have been flying at lower elevation and closer to trails in a manner inconsistent with Park soundscape and visitor experience objectives. We believe the changes will reduce those impacts.
5. Revised elevation rules consistent with "no flights below the rim"  
-- Previous elevation rules failed to achieve this objective of the 1987 National Parks Overflight Act, and most recreational users believe that current flight are violating the SFRA even though technically they are not (and in our experience sometimes they are). This change is important because many visitors who are familiar with this issue do not believe current tour flights are consistent with the intent of the law.

Aircraft operators including air-tours, commercial and private aircraft also gain some favorable results.

1. Air-tour operators express a need for final rule-making and an end to uncertainty, end to litigation, and to conservation efforts to reduce or eliminate all aircraft operations from GCNP airspace. The proposed rules meet this test.
2. Kaibab Plateau routes which are especially important to specific operators (proposed for elimination by some GCWG participants) remain intact.
3. All 4 existing cross-canyon low-altitude flight corridors are preserved without significant changes that could affect essential private aircraft travel through Grand Canyon airspace or potentially conflicting with high-traffic areas designated for air-tours.
4. New elevation and routing rules can improve flight safety by reducing pilot-initiated variability which can sometimes verge on dangerous "hot-dogging" to impress clients.
5. Unrestricted commercial activity in parts of the Western Grand Canyon in recognizing the preference for commercial development expressed by Hualapai and Las Vegas tourism advocates.

The proposed rules do raise some concerns as follows:

1. Although GCHBA supports plans to require conversion to Quiet Technology (QT) aircraft, the current FAA definition of equipment for this classification could fail to achieve the intended purpose of reducing aircraft noise -- that is, by introducing aircraft with the same or greater noise footprint with increased passenger capacity.  
Only if replacement QT aircraft has the same carrying capacity would conditions be improved.

DES 10-60 page 56 Table 2.5 asserts "Quiet-technology conversion requirement would also reduce energy usage as larger aircraft carry more passengers per flight"

Larger aircraft would be equipment whose characteristics and impact have not been assessed within the scope of the plan, and could reasonably be expected to have a greater soundscape impact than current aircraft, and if operating with the same flight allocations, an effective increase in aircraft noise.

2. There is a degree of uncertainty whether the Preferred Alternative actually establishes controls on tour flights which operate during the dawn curfew period by diverting around specific restricted zones. These flights are low-altitude aircraft during a period intended to be protected in the plan. Air-tours which are currently flying QT equipment in these locations are not merely audible but intrusive due to the early hour and absence of other aircraft.

The stated plan objective is:

Preferred Alternative Executive Summary (page v) "In Marble Canyon, there would be fewer routes with all flights using quiet-technology aircraft. Therefore, air tour aircraft sounds would be low and barely audible"

DES 10-60 page 47 line 5-7

“For all East End routes, including Marble Canyon, May 1 through September 30 allowed air-tour flight times would be nine hours (8 a.m. to 5 p.m.); October 1 through April 30, flight time would be seven hours (9:00 a.m. to 4:00 p.m.). This modification would ensure at least one hour of flight-free time after sunrise and before sunset.”

DES 10-60 page 57 Table 2.6 East End Seasonal Curfew/NPS Preferred Alternative “Curfews apply to entire East End, including Marble Canyon”

However, DES 10-60 page 45 Map 2.5 shows no specific SFRA controls north of the Zuni GA and air-tour entry zone, and the possibility of flights entering the East End and Marble Canyon areas from the west or by FAA waiver remains a concern without explicit protection. The final EIS must resolve this ambiguity to assure the stated objectives of the plan.

Finally, GCHBA strongly supports the seasonal component of the proposed rule as possibly the single most important contribution restoring natural conditions to areas which are currently unprotected. In the process of establishing seasonal routes, some operators may claim that any change from current rules could be a safety concern.

Discussion during GCWG meetings demonstrated that this was not the case, as tour operators were willing to accept significant routing changes when there was a commercial advantage, but unwilling to agree to changes focused on soundscape and visitor interests. As the GCWG process was unable to resolve this type of conflict we believe it is entirely necessary and appropriate for NPS to determine how to decide these differences.

Furthermore, we advocate for the Park to remain vigilant, monitoring soundscape conditions on a regular ongoing basis, and assuring that SFRA regulations are adhered to by air-tour operators and pilots, and assessing whether these regulations continue to achieve and effectively maintain the intended result.

In any process like this not everyone gets what they want -- in this case (implementing the Preferred Alternative) no party to the GCWG discussions gets the result they wanted. However, everyone does get something, natural soundscape and visitor experience will benefit in a number of areas, and we hope that the DEIS recommended alternative will be adopted.