



GRAND CANYON HIKERS & BACKPACKERS ASSOCIATION

PO BOX 30233, FLAGSTAFF, AZ 86003-0233

Regarding Docket Number FAA-2014-0782

Docket Operations, M-30
U.S. Department of Transportation (DOT)
1200 New Jersey Avenue SE., Room W12-140
West Building Ground Floor
Washington, DC 20590-0001

December 8, 2014

The Grand Canyon Hikers and Backpackers Association offers the following comments in response to Docket Number FAA-2014-0782, Grand Canyon National Park Quiet Aircraft Technology Incentive: Seasonal Relief From Allocations in the Dragon and Zuni Point Corridors.

Summary:

Aircraft-caused noise pollution is a serious detriment to the enjoyment of Grand Canyon National Park. Under the guise of restoring natural quiet, the present proposal will actually increase the amount of noise experienced by visitors to the Park's backcountry areas.

Therefore we propose:

- *The number of flights in the Dragon and Zuni corridors should be capped at 2012 levels.*
- *One-hour air tours should be eliminated.*
- *No additional incentives, such as those proposed here, are required or appropriate.*
- *A portion of air-tour fees should be used to monitor or model noise levels within the Park.*

The concept of the need to preserve natural quiet from impairment at the Grand Canyon was recognized as early as 1975, when the Grand Canyon Enlargement Act noted overflights were causing a "significant adverse effect on the natural quiet and experience of the park."

The National Park Service was making headway in curbing aircraft noise over the park with the passage of the National Parks Overflights Act in 1987. Sadly, there has been considerable slippage since that time, with the introduction of incentives to various types of overflights. This has resulted in the continued degradation of natural quiet in the Grand Canyon.

This degradation includes over 100,000 new flights annually in western Grand Canyon, where hardship exclusion allows tens of thousands of helicopter flights to operate over the Quartermaster area of Grand Canyon. These flights operate from dawn to dusk year-round, and make a mockery of the very concept of natural quiet.

Air-tour transportation flights, such as the daily flights that occur at dawn and fly along the sixty mile rim of Marble Canyon from the Tusayan Airport to Page, AZ, were not included in the overflights noise models, raising questions about the statistical validity of the basis for this proposal.

Concessions were again forced on Grand Canyon National Park in 2012 when the very definition of the Substantial Restoration of Natural Quiet was re-written. Substantial Restoration had been defined such that 50 percent or more of the park would be naturally quiet at least 75 percent of the time. The wording "or more" and "at least" were removed from this definition just as the National Park Service was preparing to issue final recommendations to reduce air tour noise over Grand



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Canyon. Under the new degraded definition, half the park can be loud all day, and the other half of the park can be loud 25 percent of the day. This is not substantial restoration of natural quiet.

This 2012 special interest legislation also required the FAA and Grand Canyon National Park to offer the air-tour industry incentives to convert to “quiet” technology aircraft. The law did not say how many incentives were required. Two incentives have already been awarded to the air-tour companies. These include decreasing the fees paid to the National Park by air-tour operators to operate over the park, and allowing the use of previously unused allocations. We think those two incentives are more than enough encouragement. It is particularly ironic that air-tour fees have been reduced, but now the Park is proposing to increase the cost of entrance fees and annual passes.

While the FAA and National Park Service have never provided incentives to actually increase natural quiet, this new round of incentives for “quiet” technology also allows year-round noise levels to reach 58 decibels in the Dragon and Zuni corridor; this level of noise is equivalent to a steady sound level of light traffic on a roadway. This increase in noise will be caused by allowing unlimited “quiet” technology flights in the winter season, and up to 3,700 new air-tours in the Dragon and Zuni corridors in the summer. Winter flight allocations will be moved to the summer; so long as the annual noise level under the Zuni and Dragon corridors does not exceed an annual threshold. This is unacceptable and we oppose this incentive in its entirety. The year round noise level in the Dragon and Zuni corridors should not reach 40 decibels, equivalent to the lowest limit of urban ambient sound. There should be no incentive to increase summer flights of loud aircraft, yet that is what this proposal provides. Even the so-called “quiet” technology aircraft are still very loud. At issue here is how loud is too loud. We believe the Grand Canyon is already plenty loud enough, and we oppose raising the noise level anywhere in the Park.

Given that the air-tour industry is not using its annual allocation in the Dragon-Zuni corridor of 44,000 flights, we recommend the maximum allowed flights decrease to the 2012 level of 41,000 actual flights used.

Given that both a one-hour and a half-hour flight are each considered “one flight” for the purpose of these allocations, we encourage the National Park Service to consider phasing out the one hour long-loop flights, since each of these long loop flights doubles the destruction of natural quiet in the park.

There hasn't been any updated noise modeling in Grand Canyon National Park since 2005. Given that each helicopter air-tour flight is supposed to give Grand Canyon National Park \$20, this money must be included in a funding mechanism, safe from re-allocation to other purposes, for use in immediately starting adequate and precise noise measurement and modeling every year, by month and/or for monthly peak days, for the next 13 years, for the Dragon and Zuni corridor, and all areas of the park. Without designated funding, there should be no new incentives. This measurement of what is actually happening on the ground is necessary to accomplish improvement in natural quiet. The results must be made available to the public on a monthly basis, year in, year out. This modelling should include “percent time audible” figures.



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The air-tour operators are all switching to “quiet technology” aircraft, with or without incentives. We note that Grand Canyon National Park required river trip operators to make the transition from two-stroke to four-stroke motors on their tour boats, with no incentive offered. Compliance was 100% achieved by the NPS-imposed deadline. To operate within the Park is a privilege and air-tour operators should require no incentive to operate over Grand Canyon.

Thank you for this opportunity to comment on the restoration of natural quiet at Grand Canyon National Park.

Sincerely,

Christopher Forsyth
President
Grand Canyon Hikers and Backpackers Association

cc: Superintendent David Uberuaga, Grand Canyon National Park