

ORIGINAL



DEPARTMENT OF TRANSPORTATION
DOCKET SECTION

62892

Arizona State Legislature

1700 West Washington

Phoenix, Arizona 85007

August 27, 1999

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U. S. Department of Transportation Dockets
Nos. FAA-99-5926 and FAA-99-5927
400 Seventh Street SW, Room Plaza 40 1
Washington DC 20590

Re: Docket Nos. FAA-99-5926 and FAA-99-5927 ¹¹⁵-52

Dear Sirs:

As state legislators representing northern Arizona, we wish to comment on the proposed limitations on air touring at the Grand Canyon. We applaud your efforts to protect and **preserve** the Park while ensuring that it is made accessible to the wide diversity of visitors who visit it each year. We recognize that striking this balance is an enormous challenge.

Northern Arizona is primarily a rural economy. There are many small towns throughout our region whose economies are dependent on just a handful of major employers. In Tusayan, Arizona, the economy is based almost entirely on tourism and air tour operators are key employers.

We would like to express our concern for the viability of this industry. It has been in existence for over 70 years, providing air tours of the Grand Canyon to millions of visitors from around the world. The industry has survived ups and downs, including the implementation of airspace regulations in 1987, which many operators vigorously fought. However, on-going regulatory efforts, which already include operational caps, curfews, flight corridors, no-fly zones and altitude standards, is beginning to take its toll.

The latest proposed rules will further restrict the industry by limiting **flights** based on one of the worst years in recent history. This proposal, combined with the Park Service's newly adopted noise evaluation methodology, creates such uncertainty for the industry that they have little incentive to invest in one of the most effective means of reducing aircraft sound: quiet technology. Without a sense of stability about the future, operators are understandably reluctant to invest in costly new equipment. Faced with caps and curfews, they are understandably concerned about their ability to amortize the investments. Their lenders are equally concerned about the industry's future, adding another dimension of uncertainty for operations.

The noise evaluation methodology that will be used during the two-year period that flight limitations are in place is also a cause for great concern among air tour operations. The sound threshold set for Zone 2 is so low that aircraft will be unable to avoid exceeding it, thereby setting the stage for further restrictions at the end of the two-year period.

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Perhaps unintentionally the proposed restrictions present serious threats to the continued viability of the air tour industry at the Grand Canyon. This industry is an important contributor to the Grand Canyon experience. It is utilized by the young and old handicapped and people with limited time on their hands. We believe that accommodating these visitors is just as important as providing places in the Canyon where backcountry visitors can experience solitude and peace.

We are confident that a balance can be struck among these diverse interests. We urge you to ensure that the continuation of a viable air tour industry is given appropriate consideration in your rulemaking process.

Sincerely,



JOHN WETTAW
State Senator, District 2



JOHN VERKAMP
State Representative, District 2