

In response to the May 3rd AOPA news release regarding National Parks Air Tour Plan, I would like to offer these contrasting views.

AOPA says that they "successfully argued that transient general aviation aircraft do not cause a significant amount of noise or congestion over national parks."

With recent experience at nearby Rocky Mountain National Park, where air tours are banned, I would suggest that general aviation noise very much has an adverse affect on the natural soundscape in RMNP, as well as the nearby Indian Peaks Wilderness and other cherished public lands. I would like to visit some national parks in Utah but doubt I'll visit Bryce because they allow air tours. I don't want to be subjected to this type of harassment, this gratuitous noise pollution.

As stated in the call for comments, "the ATMP process is to ``develop acceptable and effective measures to mitigate or prevent the significant adverse impacts, if any, of commercial air tour operations upon the natural and cultural resources, visitor experiences, and tribal lands."

I would suggest that the FAA's definition and use of the term "significant" is flawed and always favours the noise producers, and never silence. All noise impact in the national parks and forests is significant. Study the recent management documents for Yosemite National Park and Rocky Mountain National Park and see that aviation noise is a concern to park visitors and management. Try to understand that all noise is a significant degradation of the user experience. Every single such intrusion is an assault on the senses.

Further, while AOPA and its members have every right to voice their opinion about this issue, the government should consider that, given their exposure to loud sound pressure levels in airplane cockpits for extended periods, it very much demonstrates their tolerance for noise. As such, it does tend to raise questions about their ability or capability for the appreciation of the natural soundscape, and sensitivity to noise intrusions on an otherwise quiet natural environment.

When AOPA uses words such as "arbitrary and excessive" to counter proposals to raise the flying altitudes of aircraft, I would use those same terms, "arbitrary and excessive", to describe the noise intrusions and destruction of silence in not only our national parks and monuments, but our state parks, county and local parks, and other open spaces - all set aside with tax dollars for the enjoyment and appreciation of the natural landscapes and soundscapes - and, finally, our communities and homes.

As I understand it, current guidelines allow GA overflights of "environmentally sensitive areas" at an altitude of only 2000'. This is flawed in several ways; I do not expect the FAA to understand and appreciate my points, but I'll try anyway. First, regarding this definition of "environmentally sensitive area", the FAA, it seems, is only willing to apply that designation to the fewest and smallest areas in this great land. I, on the other hand, would suggest that the entire land is an environmentally sensitive area and that the government should be doing all it possibly can to prevent noise pollution throughout; it's failed for decades to do that.

As for the existing 2000' height restriction, this, too is flawed because many aircraft produce considerable noise from such great distances that they are almost (if not completely) invisible with the naked eye. A more appropriate

response would be to set the minimum flying height to the distance at which a plane can be heard. If a plane is audible at 6000', it doesn't belong there. Simply, the aircraft should have an imaginary "noise bubble" that prevents it from flying below altitudes that affect naturally quiet areas. Treating all aircraft as if they all had the same noise impact on the land is inappropriate. It tends to illustrate the FAA's complete lack of understanding of, and insensitivity toward, silence. It reinforces, too, why the EPA (or other agency), and not the FAA, should be making decisions about noise.

The "noise bubble" is one possible approach to keeping noise pollution out of our national parks, monuments and wilderness areas. Another option is to simply protect the airspace above these areas - all the way up to the 40,000' altitude where commercial jets may fly.

The government should, in order of preference:

- 1) Close all airspace within two miles of national parks, monuments and wilderness areas.
- 2) Prohibit aircraft overflights at any altitude at which they are audible (from the highest point on land).
- 3) Raise the minimum height from 2000' to 5000'.

Additionally, the FAA should immediately prohibit any new flight operations over national parks, and block existing operators if they did not respond to the FAA advisory requesting notice of their commercial exploitation of the airspace over our national parks.

The government should afford tribal lands the same protection, courtesy and respect that it does our national parks.

Citizens demand the right to enjoy the gentle sounds of wind and rain, the rustling of leaves, the sound of birds and insects, the sound of a gurgling stream or babbling brook - the sounds of nature - free of aviation noise pollution. We defend the soundscape of the land. Give us a refuge, a haven, from the omnipresent aviation noise pollution that torments our society. Please, give us some peace.

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