

DOCKET NO. FAA-2003-14715

Thank you for the opportunity to comment on the Proposed Rule for Noise Limitations for Aircraft Operations in the Vicinity of Grand Canyon National Park (14 CFR Part 93), published in the Federal Register on March 24, 2003.

We support the proposed noise emissions standards ONLY if they apply to ALL commercial tour aircraft at the Grand Canyon. We strongly oppose any "incentive routes" for aircraft meeting the standard. Duplicate routes connecting the same two points (one incentive route and one non-incentive route) would only INCREASE noise by spreading it over a wider area. This would be counterproductive to both the Rule and the Overflights Act. To have any positive effect, the standards must be mandatory, not voluntary. Noise emissions standards should be a prerequisite for the privilege of flying in the Grand Canyon SFRA. No other "incentive" is necessary.

Our interest in noise limitations is to (a) minimize the distance that tour noise travels from a given route, and (b) minimize the number of flights. These two goals would maximize the area free of air tour noise while minimizing the number of intrusions within the noisy area. We recognize that, for many miles on either side of a tour route, all types of aircraft will be audible. Powered aircraft are inherently noisy, so emissions standards cannot restore natural quiet. The only way to achieve natural quiet is to close unnecessary routes. While some tour aircraft are less noisy than others, the location of the routes is a far more significant factor than aircraft noise emissions levels.

It appears from Figures 5 and 6 in the FAA's "Methodology to Categorize the Noise Efficiency of Air Tour Aircraft in GCNP" (December 1996) that the only tour aircraft in common use at the Grand Canyon that would meet the proposed standard is the Vistaliner, a modified DeHavilland Twin Otter. However, other aircraft which collectively make up most tour operations are within a decibel or two of meeting the standards. Some of these aircraft might be able to comply by retrofitting and recertification. While the Vistaliner is not as noisy as some aircraft, according to Figures 5 and 6 it is louder than the tour helicopters, and certainly not "quiet." We have confirmed from rigorous field observations that Vistaliners overflying the Canyon are audible as far as 11 miles. Therefore, the emissions standards cannot have much of an effect in restoring natural quiet. Indeed, they could REDUCE the area free of tour noise if additional "incentive routes" were opened.

We support the concept of allowing larger aircraft to emit SLIGHTLY more noise, but only if it substantially reduces the number of flights. This would be assured only if there is a cap on the NUMBER OF PASSENGERS as well as on the number of flights. Otherwise, traffic could increase until there was the same number of flights--and as much or more noise--as exists now. There is ample precedent for capping the number of air tour passengers. In most of Grand Canyon National Park, the number of ground visitors (overnight walkers, mule riders, rafters, hotel guests) has been strictly limited for three decades, to protect both the park and the visitors' experience. There is no reason for air tour operators to be given a special privilege (unlimited customers) that other park enterprises and visitors do not enjoy.

Sincerely,

Dennis Brownridge, Friends of Grand Canyon