

Lake Mead Air operates its fleet not only on scenic air-tour flights but also works with the Hualapai Nation supporting their tribal enterprises at the river helipad for river-runners (as allowed by public law 100-91), bringing tourist to its Grand Canyon West enterprise and its aircraft are used by the tribe for land management purposes such as fire-fighting and emergencies related to natural disasters.

Lake Mead Air, as a partner with the Hualapai Nation asks that its fleet of aircraft and the fleet of other aircraft working with the tribe be exempted from any regulation that is not endorsed by the Hualapai Tribal Council with regard to the sound issue. Page 24 pp2 this NPRM

SUMMARY OF COMMENTS

This NPRM was worked out in a vacuum regarding industry.

This NPRM does link the concept of noise to the visitor. Page 10 pp3 this NPRM

This NPRM assumes that the park visitor is less bothered by a larger aircraft which generates as much sound energy as a smaller aircraft by utilizing a concept of decibels per seat rather than over all sound output. Page 26 pp2 this NPRM)

Because this NPRM addresses sensitive areas it automatically generates less sensitive areas. The Sanup Flight Free Zone (FFZ) is a very insensitive area with very few visitors and there should be no additional burdens placed on sound output. Virtually all Sanup visitors arrive by all wheel drive vehicle or powered boats.

BACKGROUND:

According to the National Park Service(NPS) the threshold noticeability of sound is 7db. Further more the concept of Natural Quiet (NQ) is integrally linked to protection of Cultural Resources, Wildlife Resources and the Visitor Experience. The NPS Finding A Balance Workshop Information Packet informs us that cultural and wildlife resources are adequately protected under SFAR50-2. Therefore Visitor Experience is

the remaining issue regarding NQ. All of the other models with Percent Time Audible, etc. are linked to the visitor. This NPRM acknowledges that some parts of the Park are more sensitive than others regarding sound. Therefore the thrust of protecting the Visitor Experience needs to be directed toward the visitor's perception rather than percent time audible. Although a sound may be audible it does not necessarily adversely impact the visitor. Also, the notion that bigger aircraft are allowed to be louder does not fit the concept of protecting the visitor experience. There is a unfounded assumption that all air-tour operators flying would fly less if they had larger aircraft. Due to the very high cost of "quieter aircraft" they must fly more to pay for themselves. What part of NQ is satisfied by maximum utilization to pay off debt-service on quiet aircraft that are not really quieter at all. They are only quieter per seat---a kind of accounting trick that does not really address noise impact at all. According to Figure 2a of the NPRM, the 19 passenger Vistaliner generates as many decibels as the 8 seat Cessna T207. In order to pay for the Vistaliner its main user runs scheduled service on each airplane up to 5 or 6 round trips with a fleet 18 airplanes . That is nearly 200 missions/day all with sound levels equivalent to the Cessna 207. Therefore in the quest to use "quieter aircraft/passenger seat" the financial stress forces maximum utilization of the equipment which may force the airline to fly more just to pay the debt service.

1. RESTORATION OF NATURAL QUIET AND THE PARK EXPERIENCE ALREADY ACCOMPLISHED BY SFAR50-2.

During the two years prior to Public Law 100-91, the unsolicited visitor complaints numbered approximately 10,000 per year from 2.9 million visitors. In the three years following enactment of PL100-91 the complaints decreased to an average 32 per year and last year there were 25 complaints from 5 million visitors reducing unsolicited ratio of park visitors per complaint to 1 complaint per 198,000 visitors. Natural Quiet has been substantially restored to Grand Canyon from park experience standpoint.

2. QUIET TECHNOLOGY : WHAT DOES IT REALLY MEAN?

In theory this means reducing sound at its source. However, quiet technology notwithstanding, protecting Cultural Resources, Wildlife Resources and the Visitor Experience is the issue. Judicious routing is the

key because separating the source from the visitor is the bottom line . The so-called quiet or quieter technology aircraft may actually be louder than standard aircraft depending on the number of seats. Protecting the park experience is accomplished by routes, not altitude and not quieter technology.

3. IF THIS NPRM IS ADOPTED WHAT WILL BE THE CONSEQUENCES REGARDING NQ AND WHAT WILL THE EFFECT ON THE AIR TOUR BUSINESS?

Several companies will not be able to meet the equipment standard and will sell or close. The shame of this is quiet aircraft “SOUND GOOD POLITICALLY”—but that is the only place they make a difference in Grand Canyon.

. WHAT IS THE STANDARD REALLY BASED UPON?

NOT VISITOR COMPLAINTS

NOT ON ANY DEMONSTRATED DIFFERENCE IN VISITOR RESPONSE.

Although Lake Mead Air believes that aircraft noise is a political rather than a real issue because less than 1:198,000 park visitors complain about aircraft, if a transition is to be made, FAA should provide sound monitoring equipment for fly-over information on aircraft either modified or flown differently than those conditions set forth under AC36-1f. AC36-1f indicates that it rates the flyover at 2700 rpm with an 80” diameter prop whereas we operate our normally aspirated aircraft with a 78” prop at 2400 rpm. This corresponds to 24/27X78/80 for the tip speed of the prop. Or Mach .86 compared to Mach .74. Therefore the Lake Mead Air fleet of class A aircraft might well fall into class B due to the propeller diameter and operating RPMs. If we are agree that the Vistaliner is quiet enough then the overall rating of the Vistaliner plus 6 db rather than its weighted “seat db rating” should set the standard. Vistaliner.

ALTERNATIVE PROPOSALS: If it is determined that NQ requires quieter aircraft then certainly the above paragraph shows

CAPACITY ISSUE: If there is a steady rise in complaints for a period of 10 years and the number of complaints approach 1% of total park visitation then capacity has been reached.

Page 52: If the Dragon Corridor represents the most sensitive area of the park why was the Fossil closed---other than %time audible. Certainly no related to visitor experience. Why no flights on the north side of the river between Burnt Canyon and Diamond Creek--- certainly these areas are not related to visitor sensitivity.

BENEFITS: THE SADDEST JOKE OF THIS PROCESS IS THE ATTEMPT TO OFFSET THE ECONOMICS WITH ECONOMIC VOODOO: The river-oar user group, the most sensitive to motor sounds recalled hearing 12 aircraft over a 10.2 day average trip. This is an encounter of 1.2 aircraft per day including high altitude jets , military and cargo aircraft. As for tour planes the events last about 4 minutes which means that even if 100% of the aircraft heard were tour aircraft, they were an event that last 1/10 of an hour, 6 minutes, 360 seconds-----no reasonable person in this day in age can be high disturbed over even a tour airplane for 360 seconds/24 hour day.

As for the VALUE of Natural Quiet that question was never asked. The question that was asked was two questions with 1 answer:

How important is hearing the sounds of nature and enjoying natural quiet.

Natural quiet was never defined and I challenge the FAA to interview 1000 automobile driving visitors and ask them why they came to Grand Canyon. I guarantee that the number that indicate to see the scenery will outweigh those that say they came to enjoy natural quiet by at least 95% ---whereas government studies indicate that NQ was nearly as important as viewing the scenery. This writer doubts that the drivers will even use the term Natural Quiet.