

# G R A N D C A N Y O N T R U S T

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March 25, 1994

Mr. Boyd Evison  
Superintendent  
Grand Canyon National Park  
P.O. Box 129  
Grand Canyon, AZ 86023

Dear Superintendent Evison:

Thank you for hosting last week's workshop on Grand Canyon overflights and for your inspirational opening remarks about the importance of protecting the canyon's natural quiet.

In a separate mailing, we are sending you recommendations prepared by the Grand Canyon Trust and a coalition of environmental interests for amending Special Federal Aviation Regulation (SFAR) 50-2. This letter is intended to offer the advice of the Grand Canyon Trust about priorities and the process for amending SFAR 50-2.

First, we urge the National Park Service (NPS) to move expeditiously and deliberately in making substantial revisions to overflight regulations. Criticisms about NPS noise studies by the air tour industry should not delay the process, nor should the NPS give serious consideration to establishing a federal advisory committee, as the Air Access Coalition has proposed.

In both cases, the air tour industry is challenging the plenary authority of the National Park Service to protect the natural values for which Grand Canyon National Park was established. Although marginal improvements could be made in the NPS noise studies, you now have compelling evidence to conclude that SFAR 50-2 has not substantially restored natural quiet and experience within the park. That evidence provides more than ample reason to revise the existing regulations. In the past, the NPS has appropriately restricted backcountry and river use on the basis of much less evidence than is now available about the adverse impacts of aircraft noise on the natural values of the park.

To postpone decisions in deference to the dilatory arguments of the air tour industry would further erode the ability of the NPS to manage national parks as unique and special places. If the NPS chooses to establish a federal advisory committee to recommend regulatory changes to SFAR 50-2, we can look forward to expensive, prolonged, and protracted debate that will allow substantial increases in aircraft noise over Grand Canyon

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National Park. Because the completion of NPS noise studies has already been delayed by more than three years, the number of commercial air tour operators, the number of overflights, and the impact of aircraft noise have all increased significantly and will continue to do so until existing regulations are amended.

The Secretary of the Interior and the Secretary of Transportation have initiated the process for revising SFAR 50-2 at the Grand Canyon and for adopting new rules to protect natural quiet in other national parks. This process provides for public comment and involvement that is available to all affected interests, including the air tour industry. We believe that SFAR 50-2 should be amended under this existing process and that it would be a mistake to create a separate process under the Federal Advisory Committee Act.

Secondly, the Grand Canyon Trust strongly objects to the National Park Service's aircraft management objective, namely, to "Provide a quality aerial viewing experience while protecting park resources." We are particularly concerned that this objective implies that NPS is obligated to provide aerial viewing experiences at Grand Canyon National Park. We are unaware of any legal obligation or authority that would require that the NPS adopt such a policy. Is the NPS required to provide a quality off-road vehicle experience, or any analogous experience, in the park?

With respect to air tour operations, or any other visitor service, the National Park Service should place highest priority on asserting its responsibility and authority to manage the Grand Canyon for those purposes as defined in the General Management Plan (GMP):

"As a place of national and international importance, preserve and protect the natural and cultural resources and ecological processes of the Grand Canyon, as well as its scenic, aesthetic, and scientific values.

Provide opportunities for visitation to experience and understand the environmental interrelationships, resources, and values of the Grand Canyon without impairing the resources."

The GMP specifically identifies the values of "natural quiet and solitude" as significant: "The Grand Canyon is recognized as a place with unusual and noticeable natural quiet, and direct access to numerous opportunities for solitude." The NPS objective for the Backcountry and River Corridor Use Zones is: "Restore and maintain natural quiet by protecting the wilderness character of remote areas." This objective suggests a 100 percent reduction in aircraft noise over those areas of the park.

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The extent of aircraft noise intrusions at the canyon is in direct conflict with management objectives for the backcountry, river, and developed areas of the park. We believe that the first step to remedy this immediate concern should be to impose further restrictions to reduce the aerial extent of canyon overflights. Moreover, the National Park Service should eschew any policy or objective that states or implies that it is under any obligation to provide for air tours at Grand Canyon National Park.

Lastly, we urge the National Park Service to add greater clarity to "the substantial restoration of natural quiet." That definition should be based on whether or not the noise of air tour overflights is audible. The Grand Canyon Trust has previously proposed that the NPS adopt a standard of restoring natural quiet to at least 90 percent of the park, wherein no scenic overflight noise is audible. We suggest that such a standard is very reasonable, given that it would still allow aircraft noise to penetrate 190 square miles of the canyon. However, this standard would require a substantial reduction and revision of existing flight routes to a few crossings at narrow portions of the canyon.

One way to implement the 90 percent standard would be to redesign flight corridors so that natural quiet is restored at first to something less than 90 percent of the canyon (e.g. the Quiet Canyon Coalition proposal seeks natural quiet restoration to 65% of the canyon). The regulation could then rely on a declining noise-budget approach and incentives for making up the difference between the standard and the amount of noise reduction accomplished by redesigning flight corridors. Under this strategy and using the 65 percent proposal, the 25 percent difference could be made up through a phase-in of less noisy aircraft over time.

Another option would be to use temporal restrictions to attain some of the standard. For example, if air tours were prohibited during the motor-free season on the river, natural quiet would be restored to nearly 100 percent of the park for 25 percent of a given year. The remaining restoration of natural quiet could then be attained by reducing flight corridors and providing incentives for less noisy aircraft.

We appreciate your careful consideration of our advice and would be pleased to meet with you and your staff to elaborate on the ideas presented in this letter. We are confident that you are well aware of the window of opportunity that is now available for restoring and protecting one of the fundamental values of Grand Canyon National Park.

Sincerely,



Roger Clark  
Conservation Director