



PO Box 1934
Flagstaff, AZ 86002
(928) 773-1075 phone
(928) 773-8523 fax
gcrg@infomagic.net
www.gcrg.org

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To Whom It May Concern,

Grand Canyon River Guides, Inc., (GCRG) founded in 1988, is unique in that it provides a unified voice for river guides and river runners in defense of the Colorado River corridor through Grand Canyon. Our non-profit educational and environmental 501(c)(3) organization is comprised of over 1,800 individuals who are passionately dedicated to the continuing preservation of this national icon. Consequently, Grand Canyon River Guides' goals are to:

Protect the Grand Canyon,
Set the highest standards for the river profession,
Celebrate the unique spirit of the river community and
Provide the best possible river experience

GCRG's early involvement with the Grand Canyon overflights issue demonstrates our great measure of concern about an industry that continued to expand exponentially despite the Overflights Act of 1987, President Clinton's 1996 Earth Day mandate, repeated protection efforts by Senator John McCain, and frequent legal challenges. In her 1995 testimony at a FAA Public Hearing, past GCRG president Jeri Ledbetter crystallized the critical importance of a resource at risk – natural quiet, the absence of manmade sound:

“In a world that is so oppressed by the clamor of technology, there are few sanctuaries. Only a tiny fraction of the earth’s surface is set aside for wilderness values. Those small remnants of wilderness, although protected on the ground, are increasingly subjected to an onslaught of mechanized sound from the air. Areas free from manmade noise are truly our most endangered habitats.”

The National Park Service formalizes this sentiment in the following sections of the 2001 NPS Management Policies:

Section 4.9 “The National Park Service will preserve, to the greatest extent possible, the natural soundscapes of the parks.”

Section 8.4 “The Service will take all necessary steps to avoid or to mitigate adverse effects from aircraft overflights.”

These policies also make it abundantly clear that the importance of natural soundscapes is deemed as critical as all other natural values and therefore worthy of equal protection. Use levels, access, and impacts are all carefully examined in light of the of the Park’s conservation mandate where resource protection must remain the top priority. It is now time for the conservation mandate to be strictly applied to the “onslaught of mechanized sound from the air.”

Grand Canyon River Guides views the proliferation of overflights as a primary example of a mode of access that negatively impacts the experience of other visitors as well the environment itself. Our members experience this firsthand as they boat and hike the canyon, exploring the majesty of this crown jewel of the national park system.

It is important to note that the commercial river industry is strictly limited because of its potential adverse impacts on both the physical and social resources of Grand Canyon National Park. It is now time for the commercial air tour industry to be similarly scrutinized and constrained. **With air tours currently numbering over 100,000 annually (not including non-tour or high altitude overflights), Grand Canyon River Guides’ overriding concern centers on the degradation of natural quiet as a profoundly important Park resource. We contend that this essential quality which is so rare in our everyday lives has essentially vanished in Grand Canyon, necessitating definitive action for its restoration.** In light of that concern, Grand Canyon River Guides offers the following recommendations for the development of an Environmental Impact Statement related to overflights at Grand Canyon National Park:

Recommendation #1: Incorporate an alternative based on air tour numbers that pre-date any perceived problem. The Overflights Act of 1987 (Public Law 100-91) was passed by Congress because the number of flights in 1986 was deemed inappropriate, yet that number more than doubled in the ensuing ten years and now accounts for approximately one quarter of all air tours nationwide. Going back even further, Section 8 of the 1975 Grand Canyon Enlargement Act acknowledged the impacts of aircraft and helicopter activity and included the first legal use of the phrase “natural quiet.” Restoration should proceed from the point that pre-dates where Congress first indicated there was a problem and should not be based on an assumption that current air tour numbers (or even 1986 levels) are remotely acceptable. Including this alternative

in the EIS will also provide a baseline against which all other alternatives can be accurately measured.

Recommendation #2: Focus on the necessity of protecting natural quiet as a critical resource, rather than the number of noise complaints versus satisfied air tour customers.

The real issue here is the preservation of natural quiet and the natural soundscapes of Grand Canyon. The 2001 NPS Management Policies clearly state, *“The Service will not allow visitors to conduct activities that unreasonably interfere with... the atmosphere of peace and tranquility, or the natural soundscapes maintained in wilderness and natural, historic, or commemorative locations within the park.”* The air tour industry can always play the numbers game to their advantage citing numbers of visitors served while ignoring the on-the-ground ramifications of that access, but any meaningful dialogue revolves around resource protection as the bottom line. No type of visitation should be allowed to expand relatively unchecked in our national parks, as resource degradation will always be the result.

Recommendation #3: All alternatives should include key elements of the 1987 Overflights Act and ensuing court decisions such as (but not limited to) the following:

- Specify curfews. The existing early morning and early evening curfews are crucial to the ability of river and backcountry visitors to experience the stillness of a Grand Canyon morning or the magnificent quiet of the early evening hours.
- Consider impacts from all aviation noise (not just commercial air tours). Although the primary focus should be on low flying aircraft, all aviation noise in aggregate contributes to the degradation of the natural soundscape of Grand Canyon. Relevant factors are frequency, amplitude, duration, the physical characteristics of the landscape, and the level of ambient sound in the area.
- Apply the Park Service’s interpretation of “on any given day” rather than the FAA’s assertion of “average annual day”. There is no question that air tour noise is omnipresent every day of the year in Grand Canyon. Under no circumstances should the sound level of the non-tour season be averaged with the peak season noise. Doing so would allow an increase in summer noise levels above the current standard.
- Incorporate the NPS goal of 50% of the park achieving natural quiet (no aircraft audible) 75% to 100% of the day. Even with this weak definition, the FAA admits that substantial restoration of natural quiet has not been met. Yet, this standard is the absolute minimum that should be adopted.
- Designate flight free zones and air tour corridors. Any progress that has been made in restoring natural quiet is largely due to the creation of flight free zones that shift air tour noise away from places in time and space.

Recommendation #4: The EIS should include a thorough examination of the impact of aviation noise on birds, mammals, insects and amphibian populations in Grand Canyon.

Human-caused sound can elicit both subtle and more substantial alterations of habitats and the complex relationships of denizens in those habitats. The incorporation of acoustic ecology and bio-acoustic principles can elucidate the extent to which sound and acoustics play an important role in the healthy ecosystems that must be maintained and protected in Grand Canyon National Park. Sound intrusion can adversely affect mating, hunting, predator avoidance and other behavior that is necessary for species reproduction and survival.

Recommendation #5: One hundred percent of aircraft (both fixed wing and helicopters) should be required to transition to “quiet technology” within a firm, yet reasonable timeframe. Although quiet technology does not engender significant inroads in reducing decibel levels (i.e. quiet technology is not really quiet, just a bit less noisy), it is a useful tool in aviation noise reduction and one that should be mandatory. However, we stress that moving to quiet technology should not allow air tours to increase under the assumption that if it’s quieter, it’s somehow acceptable and we can have more of it. Noise emissions should meet a pre-determined criterion, and if this is not possible, those aircraft should be phased out. GCRG further suggests that this standard should apply not just to air tours, but also to the approximately 1,400 annual river-related flights used for the Whitmore exchanges allowed by the 1987 Overflights Act. The transition to quiet technology should be considered the “cost of doing business in Grand Canyon” and a strict requirement integral to operating responsibly in one of the most astoundingly beautiful places on earth.

Recommendation #6: Replace some helicopter and small plane tours with larger capacity fixed wing planes. Using larger capacity, twin engine fixed wing planes with quiet technology can efficiently reduce the number of flights, and make them less impactful, while maximizing access.

Recommendation #7: Examine noise impacts in sensitive areas (flight free zones). Simply put, noise travels. This effect is exacerbated in the desert environment of Grand Canyon where ambient sound levels are quite low. As aircraft noise moves laterally into flight free zones, it should be monitored and the impacts discerned in terms of disruption of natural quiet, interference with the visitor experience, and environmental consequences.

Recommendation #8: Require a cap on the number of air tour businesses, as well as on the number of flights. All other forms of visitation and commercial activities are carefully regulated in Grand Canyon National Park, from river trips, to backcountry hiking, to mule rides, and even hotel rooms. The Park Service has strict limits for these uses, in spite of virtually unlimited demand, because their goal is the protection of resources and the quality of the visitor experience. In fact, the overarching NPS mandate specifies, “*when there is a conflict between use and conservation, the protection of the resources will be predominant*” (2001 NPS Management Policies with intent derived from the Organic Act). Reasonable and responsible limits should extend to ALL forms of visitation, however transient, including air tours. The profound necessity for this action is clear when viewed against the astounding growth of the air tour industry in Grand Canyon.

Recommendation #9: Require limits and restrictions on airline/jet overflights over Grand Canyon. As previously mentioned, the broader ramifications of all overflight noise must be reviewed and assessed. We suggest that airliner overflights should not be given on an as-requested basis. Strict limits should be enforced and routes altered to ensure commercial jet noise compliance. Perhaps airlines could bid on overflights and sell seats on such flights at a premium with some derived funds going to a sound monitoring program to determine impacts of air traffic noise on wildlife.

Recommendation #10: Utilize all available modeling and ambient sound data. There is a tremendous amount of good information that should be incorporated in any EIS. The Park Service's Natural Sounds Program, for example, helps parks to "protect soundscapes by monitoring sounds, both appropriate and intrusive – establishing ambient baselines and assessing potential impacts." The program deals with "whatever sounds are appropriate for individual parks and the reason they were established" ("A Sound Resolution: Curbing Noise Pollution in the Parks," NPCA Magazine, spring 2006). Other models such as INM Model and the Noise Map Simulation Model could also be useful in assessing progress towards achieving substantial restoration of natural quiet. However, we caution against linking the data from the Volpe Center Acoustics Facility (Department of Transportation/FAA), although logically based on quantitative acoustical monitoring, to subjective human response via a park visitor survey process. As mentioned previously, the main focus should be on the continued degradation of the natural soundscapes of Grand Canyon as a key resource in need of immediate restoration and protection.

Recommendation #11: Stop the end runs to Congress to change the Overflights Act or "clarify" its intent to meet the desires of the air tour industry. This battle has been waging for far too long. Legal challenges, riders on congressional bills, and stalling tactics have been standard fare, while the air tour industry has continued to expand relatively unchecked in the interim. An EIS coupled with definitive and unassailable rules should have been set nearly twenty years ago. Both the FAA and the National Park Service should now focus on what they do best – maintaining the safety of America's airspace, and protecting the values for which our national parks were established. Demand should always take a back seat to resource protection, lest we lose those very values for which these parks were set aside as our national heritage. We have the opportunity to make meaningful progress with this issue through this Environmental Impact Statement, the stakeholder assessment process, and the 2008 deadline. All relevant parties must be totally committed to following this process through to its conclusion without further legal maneuvering. Forestalling ongoing battles and non-compliance is a necessity.

Grand Canyon River Guides sincerely hopes that our comments will be considered sufficiently substantive for incorporation into the development of an Environmental Impact Statement on the effects of Grand Canyon airtours on this precious resource. Many of our members spend a good portion of their lives in the depths of Grand Canyon and we have been deeply privileged to experience, appreciate, and contemplate natural quiet on an intimate level. Having that experience, and knowing how much that precious resource is at risk of disappearing altogether, prompts us to defend natural quiet's continued existence as a defining characteristic of Grand Canyon.

History teaches us that natural quiet and the natural soundscape in Grand Canyon have been both highly valued and cherished since the park was formed. References can be found throughout writings in the early 1900s -- three quarters of a century before the term "natural quiet" was even coined. Recalling his impression of a day spent tracking sheep across the upper terraces of the Muav Gorge, Charles Sheldon wrote simply yet eloquently,

Besides the magnificent views of perpendicularly walled canyons and cliffs, I was most impressed with the profound silence – not a breath of wind today, not a sound, not a rustle of

grass or weeds, not an insect murmur, not a falling rock. Silence absolute. (Carmony & Brown, 1993:11)

“Silence absolute”, an essential element of the feeling of solitude, provides special perspective on the vastness of Grand Canyon where we can leave the trappings of civilization behind us and experience wilderness on its most basic level. This is part of what makes the Grand Canyon experience profoundly life altering and life affirming. As caretakers of this experience and as passionate stewards of Grand Canyon’s natural resources, the members of Grand Canyon River Guides recognize that it is our distinct obligation to vigorously defend the continued existence of natural quiet for the generations that follow.

Sincerely,

The Board and Officers
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