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June 15, 2011

Superintendent, Grand Canyon National Park
Attn: Office of Planning and Compliance
P.O. Box 129
Grand Canyon, Arizona 86023

Re: Canyon National Park; Actions to Substantially Restore Natural Quiet.

To Whom It May Concern:

On behalf of the Arizona Pilots Association, representing its members as well as General Aviation Pilots within Arizona, the following comments are offered to the National Park Service (NPS) in response to the Draft Environmental Impact Statement (Draft EIS) for the Special Flight Rules Area (SFRA) in the Vicinity of the Grand Canyon National Park (GCNP) to Substantially Restore Natural Quiet. Based on the Alternatives provided in the Draft EIS, the Arizona Pilots Association supports Alternative A-No Action/Current Conditions, as it is shown to meet the requirement of providing 50% or more of Natural Quiet in the GCNP. Alternative A currently provides 53% of Natural Quiet in the GCNP.

The NPS clarified that Substantial Restoration of Natural Quiet in GCNP will be achieved when reduction of noise from aircraft operations below 18,000 feet mean sea level (MSL) results in 50% or more of GCNP achieving restoration of the natural quiet (i.e., no aircraft audible) for 75% to 100% of the day, each and every day. As stated above, Alternative A-No Action/Current Conditions provides 53% of natural quiet.

The Special Flight Rules Area regulations that encompass the GCNP currently provide Flight Free Zones and General Aviation Corridors that already restrict low level overflights, minimize noise impact and enhance public safety. The Arizona Pilots Association objects to raising the floor of these Flight Free Zones or the elimination of any of the present Corridors as depicted in the NPS preferred Alternative and Alternative E & F. The Draft EIS Tables 2.5 & 2.7 show no significant documentation in substantially restoring natural quiet or improving the environmental impact to the GCNP by raising the current Flight Free Zone of 7,999 & 14,499 feet MSL to 17,999 MSL. Any proposed increase in these Flight Free Zones or elimination of General Aviation Corridors serves only to degrade & discriminate against General Aviation access, especially the East/West bound flights. These changes would impose a serious decrease in safety, due to increased congestion inside the General Aviation Corridors where

the “see and avoid” environment of Visual Flight Rules exists. Furthermore, these changes would serve to impose an economic hardship on the General Aviation industry in an already strained economy.

The Arizona Pilots Association wishes to thank the NPS for the opportunity to provide comments on restoring the natural quiet to the GCNP. We urge the NPS to maintain the current altitudes of Flight Free Zone and the present number of Corridors for the safe use of General Aviation traversing the Grand Canyon Special Flight Rules Area.

Sincerely,

Nancy Benscoter
President, Arizona Pilots Association

Cc: Jon Kyle (US Senator, AZ), John McCain (US Senator, AZ), New Mexico Pilots Association, Recreational Aviation Foundation, Utah Pilots Association & Aircraft Owners and Pilots Association

