



June 14, 2011  
Superintendent, Grand Canyon National Park  
Attn: Office of Planning and Compliance  
P.O. Box 129  
Grand Canyon, Arizona 86023

Re: Draft Environmental Impact Statement for the Special Flight Rules Area in the Vicinity of Grand Canyon National Park; Actions to Substantially Restore Natural Quiet

To Whom It May Concern:

On behalf of the Aircraft Owners and Pilots Association (AOPA) and the National Business Aviation Association (NBAA), representing general aviation and business members nationwide, the following comments are provided to the National Park Service (NPS) Draft Environmental Impact Statement (DEIS) for the Special Flight Rules Area (SFRA) in the Vicinity of Grand Canyon National Park (GCNP); Actions to Substantially Restore Natural Quiet. Based on the alternatives discussed in the DEIS, the NPS preferred alternative with modifications would allow continued necessary general aviation access within the Grand Canyon SFRA. However, we take exception with raising the upper boundary of all flight free zones from 8,000 or 14,500 mean sea level (MSL) to 18,000 feet MSL based on the impacts to transient operations and the lack of evidence that additional natural quiet or environmental restoration would be achieved.

**Current SFRA regulations allow access while restoring natural quiet**

The Visual Flight Rules procedures contained within Special Federal Aviation Regulation (SFAR) 50-2 were designed to provide separation from approved commercial air tour routes. The SFRA incorporates several flight free zones that allow for areas of GCNP that are free from low altitude overflight noise intrusion. In addition, GA and air tour overflights below 18,000 feet MSL operating in the SFRA are limited to corridors, sectors and altitudes depicted to minimize noise impacts over the park as well as for public safety. The implementation of the SFRA has greatly served to reduce low altitude general aviation and air tour noise and restore natural quiet in the GCNP.

**Existing Flight Free Zone boundaries address safety and noise concerns**

All low altitude GA operations over the park are already restricted to a great degree by the SFRA regulations that apply to all operations below 18,000 feet MSL. Without any documented noise or environmental impacts, the DEIS NPS preferred alternative proposes to raise all flight free zone ceilings to 17,999 MSL. While arbitrarily raising the upper boundary to 17,999 feet MSL may appear environmentally conscience, there is no data or evidence that justifies altering the upper boundary or proof that an alteration provides any positive change in restoring natural quiet. The only justification used in proposing the boundary changes is that "flight-free Zone ceilings increased to 18,000 feet reduce intrusions from other aircraft" – something that is already accomplished with the existing SFRA regulations.

Superintendent, Grand Canyon National Park  
Page 2  
June 14, 2011

According to the DEIS, "The NPS Preferred Alternative represents the Environmentally Preferred Alternative because it provides the best balance between resource protection and a wide range of beneficial uses of the environment without degradation, risk to health and safety, or other undesirable or unintended consequences". Arguably, the proposed change in flight free zone boundaries serves only to degrade general aviation access and safety when operating in the GCNP by eliminating routing and altitude options that currently do not impact the GCNP soundscape.

AOPA and NBAA appreciate the opportunity to provide comments and feedback to the National Park Service as they seek to restore natural quiet in the GCNP and would urge the agency to resist arbitrary and unnecessary changes to the flight free zone boundaries that do not result in substantial noise and environmental restoration.

Sincerely,



Heidi J. Williams  
Sr. Director, Airspace & Modernization  
AOPA



Robert G. Lamond Jr.  
Director, Air Traffic Services & Infrastructure  
NBAA

cc: Federal Aviation Administration, Airspace Regulations, Air Traffic Control  
Procedures Office