

Congress of the United States
Washington, DC 20515

June 20, 2011

Mr. David Uberuaga
Superintendent
Grand Canyon National Park
Attention: Office of Planning and Compliance
P.O. Box 129
Grand Canyon, Arizona 86023

Dear Superintendent Uberuaga:

As members of Congress representing the states of Arizona and Nevada and the congressional districts containing the Grand Canyon, we are submitting comments on the National Park Service's *Draft Environmental Impact Statement for Special Flight Rules Area in the Vicinity of Grand Canyon National Park – Actions to Substantially Restore Natural Quiet (DES 10-60)*. We urge the Park Service to take a much closer look at the economic impacts that its preferred alternative may have on the tourism industry in Arizona and Nevada, and consider the suggestions we offer below to mitigate those impacts.

The Grand Canyon National Park hosts more than four million visitors each year who marvel at the park's 277 miles of natural wonder and breathtaking scenery. These domestic and international travelers have a significant impact on the economies of communities in both Arizona and Nevada. According to the most recent data provided by the National Park Service, the Grand Canyon supports over 5,500 jobs that fuel the local economies surrounding the park. The National Park Service also reported that non-local visitors to the Grand Canyon spent an average of \$140 per person inside the park and its surrounding communities. However, the Grand Canyon contributes to creating *far more* jobs than just those in the communities immediately adjacent to the park -- the park helps to sustain nearly 300,000 jobs in the tourism industry in Arizona and 436,000 jobs in the tourism industry in Nevada. Maintaining this level of tourism is essential to the current economic recovery and future economic growth of both Arizona and Nevada.

As you know, the air tour industry has been a partner with the Park Service and communities near the Grand Canyon since 1927. The industry currently provides more than 1,250 high-quality jobs in Arizona and Nevada. Over the past 80 years, the air tour industry has devoted significant resources to marketing the beauty and majesty of the Grand Canyon and other remarkable natural areas in the region to both domestic and foreign tourists. The opportunity to incorporate an air tour of the Grand Canyon into a visit to Phoenix, Las Vegas, Flagstaff or any city in the region to tourists is of tremendous value to our constituents.

We are concerned that the preferred alternative included in the Draft Environmental Impact Statement (DEIS) may discourage numerous tourists from visiting the Grand Canyon,

eliminating tourism jobs and dollars at a time that our states desperately need this economic activity. The preferred alternative's restrictions on opportunities to see the park from the air may cripple an industry, which provides more than 700,000 park visitors each year with a chance to view the dramatic vistas of the park from the air. Many visitors, due to physical limitations or disabilities, can only view the most majestic portions of the park by airplane or helicopter. We truly believe all visitors should have the ability to view the park by air if they wish to do so, but in a manner that maintains "natural quiet" for those visiting the Canyon by foot. We do not believe the preferred alternative achieves this balance.

We want to encourage private enterprise to devote more resources to promoting tourism to the United States, not less. The socioeconomic data presented in DEIS is outdated and unreliable. We believe it underestimates the economic damage from the reduction and further restriction of air tours. Nevertheless, this data reveals that if the preferred alternative is selected it would lead to a 10% loss in gross revenue to the flight operators and a loss of more than 1,100 jobs in Arizona and Nevada. We believe that the Park Service should update and reexamine the socioeconomic data before any final decision is made.

In response to recommendations from the National Park Service and the Grand Canyon Working Group, the FAA adopted robust regulations that have substantially reduced air tour-related noise in the Grand Canyon as required by the 1987 National Parks Overflights Act. Those regulations created a special flight rules area and placed significant restrictions on air tour operations, including: limiting air tours to 15% of the Park, setting minimum altitudes and operating distances from certain landmarks, setting operating curfews, and establishing an annual allocation and reporting scheme.

The actions taken to implement the Overflights Act have significantly reduced the noise and achieved the goals that Congress identified in 1987. Additionally, over the past five years, the air tour operators have spent millions of dollars investing in quiet technology aircraft. We support these voluntary actions and encourage the National Park Service to provide incentives to air tour operators, rather than restricting access, so that in the near future only quiet technology aircraft are flown above the Grand Canyon. Such a change would likely have a greater impact on restoring the "natural quiet" in the Grand Canyon than the actions recommended in the preferred alternative.

We applaud the noise reduction efforts undertaken by the air tour industry and we believe such efforts should be supported. The preferred alternative, however, does not acknowledge the progress made by the industry. Rather, it proposes significant new restrictions, including curfews resulting in a reduction in annual flight time, seasonal closures of some of the most popular air tour routes and wholesale elimination of others, and a daily cap on flights on top of a reduction in existing flight annual allocations. We believe more should be done to restore the "natural quiet" in the park, but not by restricting access to tourists and the air tour industry.

The viability of an industry that fuels our regional economy and drives tourism by showcasing one of America's most precious landmarks, and the retention of the quality jobs that go with it, should not be taken lightly by our federal government.

President Theodore Roosevelt said upon visiting the Grand Canyon, "Arizona has a natural wonder which, so far as I know, is in kind absolutely unparalleled throughout the rest of the world." We agree with President Roosevelt and look forward to working with you and others to ensure that the Grand Canyon remains a majestic treasure that is accessible to all visitors and a generator of much needed economic growth. Thank you for considering these comments.

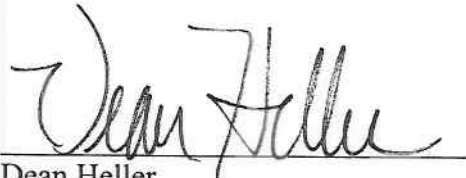
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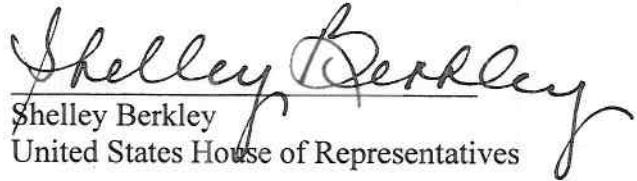
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