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OFFICE OF THE
CHIEF COUNSEL
RULES DOCKET

Date: 8/27/99 3:38 PM
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Priority: Normal
Subject: Docket No. FAA-994926, Modification of the Dimensions FAA-99-5926-167

SUBJECT: Docket No. FAA-99-5926, Modification of the Dimensions of the Grand Canyon National Park Special Rules Area and Free Flight Zones

Dear sirs:

EXECUTIVE SUMMARY:

Please be advised that I do not favor the changes contemplated.

General aviation flight should be allowed to continue uses as is. Period. We do not use up or hurt anyone and in some cases if you force us to move into military corridors, you have greatly endangered us.

Further, I DO NOT disagree with implementing and enforcing limitations of commercial sight seeing ventures over endangered and "quiet" areas. I agree whole heartedly that the overcrowding of commercial flights over the grand canyon is atrocious and dangerous. National Parks should also be protected from overcrowding.

Perhaps a limitation of X number of flights per day is acceptable, and have a lottery between the commercial companies to obtain the right, as they did for rafting trips at one time (I don't know if this lottery for raft trips is still in existence, but it was a fair way to allow yet limit!)

PERSONAL BACKGROUND:

I am a land investor, and a custom home builder in Tucson AZ working with Envirosdesigns Custom Homes. We are concerned with renewable resources, sustaining concepts, blending design into hillsides, new technologies employed in homes to update to or toward SMART houses, and in general, we are the good guys. We can co-exist with logical environmentalists, in fact that IS what we are, but no fanatics please.

We can build without the need of Giant Redwood meat, rain forest chopping, increasing ozone problems (we offer low energy use alternatives as well as solar and wind options for electric!). Yet we can build a high end luxury custom home for the wealthiest of wealthies, and they can show off their eco-sense, and I can be happy we took somebody's money to create the right kind of house - luxury or not.

PILOT experience: Single engine recreational flier, pilot since 1978 or so, hav had three single engine planes in the past and one now, Super Viking Bellanca, cloth wing, 200 MPH retractable, IFR certified, etc.

DO NOT CHANGE OUR RULES because of commercial offenses.

DO NOT overregulate what does not need regulation.

DO get rid of commercial clutter in the skies such as below rim flying for commercial craft and overcrowding by sightseers. Get out and hike it !

specifics:

93.305 Flight-free Zones and Flight Corridors.

I oppose extending the Desert View FFZ outside the boundaries of the GCNP solely for the purpose of reaching a mitigation agreement with the Traditional Cultural Properties (TCP).

I do not agree with the increase of restricted areas as proposed changing the ceiling of the airspace from 'up to but not including 18,000 feet MSL,' from the appropriate current "up to but not including 14,500 feet MSL."

LEAVE AT 14,500! The upper limit of the GCNP SFRA needs to remain 14,500' MSL!

93.301 I recommend the following adjustment to the Southeastern border of the GCNP SFRA:
REASONABLE:

Lat. 35°57'00" N., Long. 112°03'30" W.; East to Lat. 36°00'24" N., Long. 111°39'34" W.; North to Lat. 36°12'35" N., Long. 111°39'33" W.; Northwest to Lat. 36°24'49" N., Long. 111°47'45" W.

WHY: The proposed Southeastern border of the GCNP SFRA, Southern point of Lat. 35°55'38" N., Long. 111°36'03" W., effectively eliminates all Eastern VFR routes around the GCNP. By placing this point one nautical mile

(nm) from the Sunny Military Operations Area (MOA) border, the proposal effectively places a road block in the sky, making it impossible to fly from any airport South or West of the GCNP to Tuba City Airport (T03) or any

points to the East or Northeast. If adopted, this roadblock will force VFR pilots to deviate up to 300 nm in order to fly around the GCNP to the West and North. This action will result in a greater environmental impact including fuel

burned and aircraft noise and taking pilots away from other useful endeavors (production in GNP) to those areas under these newly forced VFR flight routes.

The Sunny MOA is a very active military jet fighter training area used by F16, F15, and F18 aircraft for basic fighter maneuver (BFM) training, fighter intercept training, fighter transition training and fighter formation flight training. With these fighters operating at a maximum airspeed just short of the speed of sound, no reasonable VFR pilot flying a small aircraft will enter the Sunny MOA hoping that they will be able to "see and avoid" these fighters in time to avoid a mid-air collision. Thus it is not reasonable for the FAA and the NPS to force slow flying VFR pilots into this "hornets" nest.

The GCNP SFRA was established to reduce the impact of aircraft noise on the GCNP park environment, not to provide a "protected zone" for commercial air tour operators to fly in. The proposed movement of the Desert View FFZ 5 nm to the East of the GCNP border has that effect. Therefore, extending the GCNP SFRA an additional 4 nm beyond the proposed Desert View FFZ solely to provide a flight corridor for commercial air tour operators is an unnecessary infringement on the limited National Airspace available for public use. Commercial air tour operators may operate freely outside the GCNP SFRA per CFR 14 Parts 91, 121, and 135.

Thanks for your careful review of my letter and input.

Lets get a reasonable stance on this and all legal modifications and regulations. Even handed, and only change where critical and appropriate.

Our enjoyment and travel in the air is just as important as certain things trying to be protected below - ESPECIALLY if we don't adversely affect that below. Attack the real offenders.

Buy a rainforest or two and protect it. That is worthwhile. Protect our ozone. Reduce pollution.

DO THE RIGHT THING.

Thanks for your consideration, we support you in your help to DO THE RIGHT THING.

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