UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

JUN 17 2011

Palma E. Wilson, Acting Superintendent
Grand Canyon National Park
P.O. Box 129
Grand Canyon, AZ 86023
Attn: Special Flight Rules

Subject: Draft Environmental Impact Statement for the Special Flight Rules Area in the Vicinity of Grand Canyon National Park, Coconino County, Arizona (CEQ # 201100036)

Dear Ms. Wilson:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (EIS) for the Special Flight Rules Area in the Vicinity of Grand Canyon National Park. Our review and comments are pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The National Park Service (NPS) has developed actions to substantially restore natural quiet within the vicinity of Grand Canyon National Park. EPA understands that the proposed EIS is a follow-up to previous actions taken by the FAA, in cooperation with the NPS, since 1987 to address impacts that may result from actions to achieve the statutory mandate of Public Law 100-91 (commonly known as the "Overflights Act"). We support NPS initiatives to avoid and minimize impacts associated with air tour operations within National Parks. EPA sent scoping comments on April 28, 2006 and many of our comments were addressed in the Draft EIS, including our recommendations regarding evaluation of alternatives that support incentives for quiet aircraft technology, analysis of noise and vibration impacts, and coordination with tribes.

EPA recognizes and appreciates the need to manage recreational use of NPS lands in order to protect sensitive resources, and the difficulty of balancing the often competing goals of conservation and public access. From the perspective of protecting resources within the Grand Canyon, the preferred alternative has many clear benefits. Based on our review, EPA has rated the document Lack of Objections (see enclosed "Summary of EPA Rating Definitions"). We believe, however, that the Final EIS would be strengthened by the inclusion of a more thorough justification for eliminating air quality as an impact topic.

Air quality as an impact topic was considered but dismissed in the Draft EIS. Page 19 of the document states that "although aircraft emit air pollutants within Grand Canyon National Park, minor changes in pollutant production resulting from the Alternatives considered in this EIS would not make an appreciable difference in park haze or ozone levels... which would not make an appreciable difference in air quality." We note, however, that Alternatives E, F, and the NPS Preferred Alternative are expected to reduce, to varying degrees, flight operations in the park (p. 583). Given that reductions in flight

operations would be expected to result in reductions in air emissions, we recommend that the Final EIS identify the anticipated differences in pollutant production among the alternatives and the basis for the determination that those differences would be "minor."

The National Park Service has consulted with Native American tribes since scoping was initiated in 2006. Streamlining the NEPA and the National Historic Preservation Act (NHPA) is encouraged. Statutory provisions of Section 106 require the NHPA process to be concluded before agency approval of an action. Please include the letter from the State Historic Preservation Officer (SHPO) that acknowledges the SHPO's concurrence and completion of the NHPA Section 106 process.

We appreciate the opportunity to review this DEIS. Should you have any questions regarding our comments, please contact me at (415) 972-3521, or contact Stephanie Skophammer, the lead reviewer for the project. Stephanie can be reached at (415) 972-3098 or skophammer.stephanie@epa.gov.

Sincerely,

Kathleen Martyn Goforth, Manager
Environmental Review Office
Communities and Ecosystems Division

Enclosures: Summary of EPA Rating Definitions

CC: Mary Killeen, National Park Service
Loretta Jackson-Kelly, Hualapai Tribe
Roland Manakaja, Havasupai Tribe
Leigh Kuwanwisiwma, Hopi Tribe
Alan Downer, Navajo Nation