

Oversight Hearing titled “Limiting Access and Damaging Gateway Economies: Examining the National Parks Air Tour Management Program”

Questions from Rep. Case for Mr. Tomlin

1. Please provide specific number of elderly (age 65+) individuals, individuals with disabilities and youth who have received tours over national park units from your business over the last five years.

Age 65+ By Year

2023: 9,330

2022: 9,135

2021: 1,447

2020: 1,876

2019: 19,767

2023: Passengers With Limited Mobility

- Children: 16,566
 - Lap Children: 273
- Disability Noted: 262
- Requires Cane/Stool: 121
- Likely BMI greater than 40 : 1,345

2022: Passengers With Limited Mobility

- Children: 19,027
 - Lap Children: 275
- Disability Noted: 270
- Requires Cane/Stool: 99
- Likely BMI greater than 40 : 1,569

2021: Passengers With Limited Mobility

- Children: 15,038
 - Lap Children: 388
- Disability Noted: 171
- Requires Cane/Stool: 127
- Likely BMI greater than 40 : 1,523

2020: Passengers With Limited Mobility

- Children: 6,500
 - Lap Children: 179
- Disability Noted: 100
- Requires Cane/Stool: 44
- Likely BMI greater than 40 : 699

2019: Passengers With Limited Mobility

- Children: 25,691
 - Lap Children: 328
- Disability Noted: 379
- Requires Cane/Stool: 68
- Likely BMI greater than 40 : 1,092

2. What are your company’s formal policies and procedures to provide reasonable accommodations to individuals with disabilities seeking air tours? Has your company ever been unable to provide accommodations to allow an individual with a disability to fly with your business?

Our company’s formal policies are approved by the FAA and implemented in our certificates general operations manual (GOM). I have included Grand Canyon Scenic Airlines’ procedures from our manual to provide an example.

Both of our companies (Papillon and GCSA) have never denied boarding to anyone who has met the FAA requirements to travel by commercial air.

3. Are there uniform standards across the air tour industry to provide accessibility or are decisions left to individual operators?

All operators must work with their local Flight Standards District Office for their type of equipment and operating environments to ensure safe boarding, transport and unloading of all passengers. These will vary from company to company based on these variances.

4. Please provide specific number of flights your business has conducted over each individual national park unit, including whether those flights are subject to the Grand Canyon ATMP Process, would be subject to an ATMP developed or in

development under the National Park Air Tour Management Act or are not subject to any ATMP.

All flights are reported to the FAA that occur over the National Parks we fly in. Below is a table of the parks our companies have flown in over the past 5 years that are subject to these new ATMP processes. These reports are from 2017-2019. Any other National Park flights occurred over the Grand Canyon National Park which is subject to the preexisting GCNP ATMP.

Flights	GLCA	RABR	LAKE	BRCA	CANY	CARE	ZION
2017	2,700	701	8,474	45	2	1	0
2018	3,009	780	7,119	9	4	4	1
2019	3,787	537	5,150	94	0	0	7

GLCA – Glen Canyon National Recreation Area

RABR – Rainbow Bridge National Monument

LAKE – Lake Mead National Recreation Area

BRCA – Bryce Canyon National Park

CANY – Canyonlands National Park

CARE – Capital Reef National Park

ZION – Zion National Park

5. What is the average cost for an individual air tour over a national park unit at your business?

We have products that range from \$100-\$600+. Rates change daily and by season. For the most up to date pricing please go to: papillon.com and scenic.com

Rates include fees to tribal partners such as the Hualapai and Navajo who receive flat rates for tours or a percentage of ticket sales or both. These fees may also include overflight payments to National Parks which require an overflight fee.

6. Who manufactured each of the helicopters in your fleet? Do any of your helicopters currently utilize quiet technologies?

Airbus, Bell and MD helicopters are our helicopter manufacturers. We have 28 x EC-130 helicopters that all meet Quiet Technology Standards as well as 1 x MD-900 helicopter we use for NPS search and rescue missions.

7. Did your company provide comments to any ATMPs during their public comment period? Did you company provide any input through a trade organization? Did your company attempt to provide any additional input to the agencies outside the public comment opportunities? If so, please describe that input.

Both of our companies have had representation on NPOAG. However, the NPOAG was not involved in helping craft the ATMPs. The NPOAG was only briefed on the plans at the same time the

information went to the public at large. The information we could have provided in the drafting process to avoid creating these safety hazards the agencies created, was never provided. We did provide comments through the public comment period in the Federal Register.

8. Do you or any individuals from your company participate in the National Park

Overflights Advisory Group?

Since the inception of NPOAG we have always had a sitting board member representing our companies. Prior members of this group have included our founder Elling Halvorson and former president of the Regional Airline Association and VP at Papillon, Alan Stephen. Currently Papillon's COO, John Becker is our sitting member and I am his alternate.

9. Please list any specific safety concerns you or your company have with individual ATMPs. How would you recommend that the agencies address those concerns while maintaining the level of resource protection described in the plan?

The National Park Service has excluded both NPOAG, The Operators and the Local Flight Standards District Office on all completed ATMP's. For example, in the Case of Bryce Canyon the draft ATMP had operators flying at altitudes that would require pilots to be on oxygen to fly the tour routes, additionally the NPS had the operators on a different frequency than general aviation transitioning through the area and entering the traffic pattern for the Bryce Canyon Airport.

The Final ATMP still has safety issues with the route structure for tours in Bryce Canyon. Tour helicopters and airplanes are in conflicting traffic on the route, Helicopters and Fixed wing tour aircraft must climb and descend through each other's traffic. Additionally tour aircraft will also have to climb and descend through general aviation traffic flying at lower altitudes.

Climb performance differs between aircraft types (Helicopters, Turbine Fixed Wing Aircraft and Reciprocating Fixed wing Aircraft) creating a safety of flight and these further impacts safety because visibility between high wing and low wing airplanes as well as helicopters is limited.

ATMPs only impact commercial air tour operators. The ATMPs do not deal with potentially other low altitude aircraft that are not commercial air tour operators. On any given day there are 10-20 private aircraft that leave Bryce Canyon Airport and fly over the Amphitheatre and do a scenic flight over the park.

Our airport is a high-density altitude airport, which means that an aircraft's performance is impacted by the altitude. Air density is determined by pressure, temperature, and humidity. To provide better performance for our aircraft, commercial flights are operated in the morning, when conditions provide greater performance capabilities. The ATMP sets a starting time that begins after our commercial flights are usually concluded.

10. What are the environmental benefits of air tours? Have these benefits been validated by peer-reviewed scientific study?

Air tours provide no physical impact on the National Parks or their resources. They leave no garbage or footsteps behind. There is no congestion on the roads that access the parks nor inside the park boundaries. Air tours create a temporary noise signature that completely restores the park back to its original state of natural quiet once they are completed. Tours that utilize quiet technology (QT) meet an even quieter threshold and leave a smaller temporary sound impact. These tours utilizing QT have been evaluated by the Volpe Institute.