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Superintendent Steve Martin
Grand Canyon National Park
PO Box 129
Grand Canyon, AZ 86023-0129

Dear Superintendent Martin,

As you work towards developing a preferred alternative for the upcoming Draft EIS on restoring natural quiet to Grand Canyon, GCRG supports your desire to move beyond the status quo and work towards reducing noise in *more* than 50% of the park. Early indications are that Modified Alternative E holds promise, subject to completion of a noise analysis that would allow for easy comparison to other alternatives.

Possible components including longer curfews at sunrise and sunset, increasing the minimum altitudes for flights over the North Rim, the idea of seasonal routes, and addressing air tours in Marble Canyon, are certainly constructive ideas that could better protect park values. From a river guide perspective, we would like to strongly urge you to *close off Marble Canyon to air tours*. We concur with Rob Elliott from AZRA who noted at the recent NPS/FAA meeting that the initial two or three days of a river trip through Marble Canyon are essential to establish that sense of solitude as visitors experience the immensity and grandeur of the canyon for the first time.

On another note, while we heartily agree with the push towards quiet technology, we contend that those *quieter aircraft must be subject to caps and restrictions*. To gain noise reductions only to allow more flights is entirely counter-productive. Quiet technology isn't really quiet – it's just less noisy than what we have now. As you know, the river concessioners in Grand Canyon voluntarily moved away from using two-stroke engines to the much quieter and less polluting four-strokes. Doing so did not entitle them to run more trips. Every visitor use in Grand Canyon is regulated and for good reason. Conducting business in Grand Canyon is a privilege, not a right, and it comes with distinct responsibilities for preserving park values.

GCRG enthusiastically supports the continued NPS authority to preserve to the greatest extent possible the natural soundscapes of the park, to restore them when they've been degraded, and to protect those soundscapes from unacceptable impacts. As you further refine your preferred alternative, GCRG urges you to draw on your love of the river experience and your intimate knowledge of how precious a resource "canyon quiet" truly is...

Respectfully,

The Officers and Board of Directors
Grand Canyon River Guides