Committee on Resources

Subcommittee on National Parks & Public Lands

Witness Statement

TESTIMONY OF MICHAEL D. SCOTT REPRESENTING THE GREATER YELLOWSTONE COALITION BEFORE THE HOUSE RESOURCES SUBCOMMITTEE ON NATIONAL PARKS AND PUBLIC LANDS ON PROPOSED CHANGES IN WINTER USE MANAGEMENT IN YELLOWSTONE AND GRAND TETON NATIONAL PARKS,

MAY 25, 2000

Good morning Chairman Hansen and members of the subcommittee. My name is Michael Scott. I am the Program Director for the Greater Yellowstone Coalition, based in Bozeman, Montana. In addition to representing the Greater Yellowstone Coalition, I am here today on behalf of The Wilderness Society and the Natural Resources Defense Council. The Greater Yellowstone Coalition is a regional organization founded in 1983 to protect Yellowstone National Park and the lands that surround it. The Greater Yellowstone Coalition (GYC) has been significantly and actively involved in Yellowstone, Grand Teton and Rockefeller Parkway winter use issues since the organization's inception in 1983. The Coalition has over 9,000 members nationwide. We also have over 90 local, regional and national member groups and 200 business members.

I am pleased to be here today to share the thoughts of the Greater Yellowstone Coalition on management of winter use in Yellowstone and Grand Teton National Parks.

The National Park Service is facing challenges associated with increased visitation system-wide. In response to these challenges, a series of national parks, including Denali, Grand Canyon, Yosemite, Arches and Zion, have implemented, or are considering implementation of, mass transit systems and/or visitor level limits. In order to accommodate ever-increasing visitor numbers in the next century, parks must identify modes of visitor access which do not endanger precious park natural resources or impair the quality of visitor experience.

For the first time since snowmobiles were permitted access, Yellowstone and Grand Teton National Parks are assessing the impacts these vehicles have on park resources. Below, we discuss why the current system of snowmobile access to these two parks violates existing laws and regulations, how we propose to maintain and enhance visitor access to the parks and how to manage the economic transition that West Yellowstone will go through once a new system of access is adopted.

Before reviewing the specifics of Yellowstone and Grand Teton National Parks, it is important to remember the mandate of the national parks. Each national park exists to protect the unique values for which it was established for this and future generations. Parks are set aside as places that are to remain different that the rest of the country, where people can experience a respite from crowding, pollution and noise.

The Park Service must provide access to the extent that it is consistent with its protection mandate. Thus, some national parks, such as Chaco, close portions of their parks to protect resources that are too fragile

even for occasional visitation. Others, like Mesa Verde, limit access.

Yellowstone and Grand Teton are now struggling with the question of how to manage winter visitation. Winter, as compared to summer, is a much more fragile time of year, both for wildlife and the visitor experience. Wildlife must endure subzero temperatures and six months of snow. Visitors to the parks come to enjoy their vast untouched landscape and the special qualities of stillness and solitude that sets the winter season off from other times of the years.

I. History of Snowmobile Policy in Yellowstone and Grand Teton

Yellowstone first allowed visitors to access the park on motorized oversnow vehicles in 1949. Since then, winter visitation has grown, peaking at 143,000 in the winter of 1993-4. Snowcoaches first entered the park in 1963. In the meantime, local elected officials and chambers of commerce were calling for the park to plow roads in the winter, to allow for more visitation that would support local economies. The Director of the National Park Service responded to this ongoing pressure in 1967. He determined that Yellowstone should have a form of access appropriate to the winter experience and that oversnow visitation was the appropriate form of visitation in Yellowstone.

Over the years, snowmobile use increased significantly without any Park Service review. It became the dominant form of access to the two parks. Snowmobile visitation numbers grew from 1,000 machines in 1963-4 to 30,000 machines in 1973-4. In 1972, the National Park Service Regional Director in Denver asked all parks to devise winter use plans. Glacier National Park undertook such a review and noted a variety of problems caused by snowmobiling, including air and noise pollution, wildlife displacement, and conflicts with other park users. For these reasons, and because of strong public sentiment against disrupting the quiet and beauty of Glacier with snowmobiles, the park decided to ban them. Other parks including Yosemite, Sequoia/Kings Canyon and Lassen National Parks responded similarly during the same period.

The superintendent of Yellowstone, however, did not follow the directive to assess the impact of snowmobiles on park resources. Meanwhile, complaints from visitors and park rangers about air and noise pollution grew commonplace and the first studies documenting adverse effects to wildlife from snowmobile use were completed.

Future superintendents of Yellowstone allowed further expansion of snowmobiling in the park despite ongoing concerns about air and noise pollution and wildlife impacts. Finally, in the 1990s, conditions in Yellowstone and Grand Teton grew so bad that the parks were forced to take action.

A Winter Use Assessment was completed in 1990 that, among other things, stated that if snowmobile use grew by more than 15% in the decade from 1990 to 2000, the Park Service would develop a winter use management plan. Snowmobile use increased by over 15% within two years of the adoption of the Winter Use Assessment, but it was not until 1998 that the Park Service began work on a comprehensive winter use management plan for Yellowstone and Grand Teton National Parks and the Rockefeller Parkway.

The initial draft of the winter use plan released by the Park Service called for plowing the road from West Yellowstone to Old Faithful as the most feasible way of dealing with the adverse impacts snowmobiles were having on the park environment. Public comment, plus input from sister agencies such as the EPA, convinced the Park Service to abandon its plowing alternative.

Recently, Yellowstone and Grand Teton announced that they were "leaning" toward a new alternative, one

that would substitute snowcoach access to Yellowstone for the current system of snowmobile access. The Greater Yellowstone Coalition supports this approach as the only one that complies with the laws and regulations governing our national parks, that will provide continued unrestricted access by Americans to the park and which will help diversify and strengthen local economies.

II. Snowmobile Impacts on Park Resources are Inconsistent with the Legal and Policy Framework for Park Protection of Resources

Management of Yellowstone and Grand Teton National Parks must comply with the Organic Act, the Clean Air Act, National Park Service management policy, regulations regarding snowmobile use in parks (36 CFR 2.18), and Executive Orders 11644 and 11989.

Snowmobile use in Yellowstone and Grand Teton Parks creates numerous, adverse environmental problems including compromised air quality, excessive noise and reduction of natural quiet, water quality impacts, and harassment of wildlife. Social impacts such as increased congestion and decreased quality of visitor experience also result from snowmobile use in parks. Due to the breadth of impacts from snowmobile use, no measure of improvements to snowmobile technology will mitigate the problems. The recent push for "cleaner and quieter" snowmobiles simply will not resolve the impact issues facing the parks nor does it address all the legal mandates that the Park Service must comply with to assure park resources are protected.

Wildlife harassment, congestion and quality of visitor experience will remain unaffected by improvements in snowmobile noise and air emissions. The multiple mandates of the Park Service necessitate a transit solution that immediately fulfills the legal requirements to protect the parks in perpetuity. The Park Service has determined that the machines are the problem--not the visitors. There is no reason to limit the number of people in the park, but an immediate need to limit the number of vehicles. Snowcoach access would do just this, while dramatically improving air quality, natural quiet, conditions for wildlife and visitor experience.

The draft environmental impact statement on winter use for Yellowstone and Grand Teton National Parks contained a thorough and extensive review of the science and scientific literature on the impacts of snowmobiles on park resources. So thorough was the review that the EPA, in it's letter of comment to the Park Service, stated that, "…this DEIS includes among the most thorough and substantial science base that we have seen supporting a NEPA document….National Park Service clearly has the science-based information at hand to make a decision…that will protect both human health and the natural resources in these Parks." (EPA letter, page 1)

A. Air Quality

Current levels of snowmobile emissions violate the parks' duty under the Clean Air Act and National Park Service Management Policy. Snowmobile emissions at levels damaging to public and employee health and degrading to the parks' air quality have been occurring for years. Carbon monoxide levels in the park currently exceed National Ambient Air Quality Standards and will continue to be exceeded unless snowmobiles are removed.

Snowmobiles are powered by two-stroke engines. These engines create dangerous levels of airborne toxins including nitrogen oxides, carbon monoxide, ozone, particulate matter, aldehydes, 1,3 butadiene, benzenes, and extremely persistent polycyclic aromatic hydrocarbons (PAHs). Several of these compounds are listed as "known" or "probable" human carcinogens by EPA.

One snowmobile emits 225 times more carbon monoxide than an automobile.

One snowmobile emits 1000 times more hydrocarbons than an automobile.

(National Park Service, International Snowmobile Industry Association, and Environmental Protection Agency) The highest carbon monoxide levels in the nation were recorded at Yellowstone's West Entrance during winters in the 1990s. The Park Service must pump fresh air into entrance booths to curb employee headaches, dizziness, throat irritation and nausea.(Montana Department of Environmental Quality; Environmental Protection Agency; National Park Service)

Two-stroke engines also discharge 25-30% of their fuel mixture, unburned, directly into the environment. Given current levels of snowmobile use in Yellowstone National Park, this translates into the equivalent of five tanker truck loads of gasoline being dumped along park roads each winter. Unburned fuel contains many toxic compounds including benzene, toluene, xylene and the extremely persistent suspected human carcinogen MTBE. Two-strokes are one of the largest unchecked sources of pollution nationwide. Charles Emmett, an engineer with the

California Air Resources Board (CARB), says that snowmobiles are "extremely, extremely dirty compared to anything else ... [s]nowmobiles are the worst there is" (McMillion 1994).

Current air quality degradations within the parks warrant strong action. The use of two-stroke engines, in the form of recreational use of snowmobiles, in national parks violates the National Park Service mandate to protect parks' natural resources as well as the Clean Air Act. During the winter of 1998-9 Yellowstone saw 63,000 snowmobiles enter the park, with nearly 54,000 visitors traveling on the corridor between West Yellowstone and Old Faithful (Flores and Maniero, 1999).

The Clean Air Act states that the National Park Service, as a federal land manager, has "an affirmative responsibility to protect air quality related values, including visibility, from the adverse effects of air pollution in areas that are designated as "Class I". There are 48 Class I areas that are part of the National Park System. (42 U.S.C. §7401 *et seq*.) "These policies require managers to assume an aggressive role in promoting and pursuing measures to safeguard air quality and related values from the adverse impacts of air pollution" (Flores and Maniero, 1999). National Park Service Management Policies are clear that "[I]n cases of doubt as to the impacts of existing or potential air pollution on park resources, the Park Service will err on the side of protecting air quality and related values for future generations." (National Park Service Air Resource Management Policy).

B. Noise Pollution and Natural Quiet

The opportunity to experience natural sounds and silence is rare in our modernized world. National parks are among the last refuges where people can experience natural quiet. Current use of snowmobiles in Yellowstone National Park undermines visitors' opportunities to hear natural sounds and quiet as part of their park experience. Snowmobiles emit significant amounts of noise at higher frequencies than automobiles. This combination of volume and pitch makes snowmobile noise quantitatively and qualitatively different from other vehicle use in Yellowstone National Park.

Natural quiet has been recognized as an integral and irreplaceable resource of parks, which must be protected:

> "The National Park Service will strive to preserve the natural quiet and the natural sounds associated with the physical and biological resources of the parks (for example, the sounds of the wind in the trees or of waves breaking on the shore, the howl of the wolf, or the call of the loon.). Activities causing excessive of unnecessary unnatural sounds in and adjacent to parks…will be monitored and action will be taken to prevent or minimize unnatural sounds that adversely affect park resources or values or visitors' enjoyment of them." (National Park Service Management Policies of 1988).

The Greater Yellowstone Coalition conducted a percent-time audible study of snowmobile noise in Yellowstone National Park this winter. Percent-time audible data was collected at 13 sites in the Lower, Midway and Upper Geyser Basins of Yellowstone National Park between Madison Junction and Old Faithful. Eleven of the sites had snowmobile noise present more than 70% of the time, and eight of those were impacted by snowmobile noise 90% or more of the time.

Results of Greater Yellowstone Coalition Percent-Time Audible Study. Yellowstone National Park, February 19-20, 2000.

Site	Percent of Time with Audible Snowmobile Noise
Old Faithful	100%
Mystic Falls Trail	98
Grand Prismatic Spring	98
Solitary Geyser	97
Morning Glory Pool	97
Nez Perce Creek	92
Fairy Falls	90
Great Fountain Geyser	90
Boulder Hot Springs	88
Beehive Geyser	76
Fern Cascades	72
Goose Lake	41
Lone Star Geyser	0

C. Water Quality

Snowmobile emissions are deposited directly onto the snowpack of the parks. This snowpack pollution translates directly into pollution of the parks' waters as the snow melts. Snowmobiles each year emit the equivalent of five tanker truck loads onto the snowpack of Yellowstone. The components of snowpack pollution from snowmobile emissions can include toxic compounds such as MTBE (a fuel additive), and polycyclic aromatic hydrocarbons (PAHs) such as benzene, butadiene, xylene, toluene, and formaldehyde. MTBE is a known animal carcinogen and a suspected human carcinogen (Hagemann and Van Mouwerik, 1999). Benzene is a known carcinogen, and formaldehyde and butadiene are classified as probable human carcinogens by EPA (EPA; Adams, 1996). Formaldehyde, benzene and butadiene are thought to harm humans and animals at levels well below fatal doses, and certain PAHs are toxic to aquatic organisms and cause lesions in fish (Adams, 1996). The threats of PAH-contaminated stream and lake sediments derived from run-off are largely unknown, but some experts suspect significant food-chain interactions (Hagemann and Van Mouwerik, 1999). A recent report by the Park Service summarizes the risks to water quality presented by snowmobile emissions onto snow (Hagemann and VanMouwerik, 1999)

Of the 220,000 gallons of gasoline and 11,000 gallons of lubrication oil sold for snowmobiling by service stations within Yellowstone National Park alone in 1995, up to 55,000 gallons of fuel and 2,700 gallons of motor oil entered the environment as unburned, raw petrochemical pollution.[(1)] About 5,000 gallons of gasoline, and 250 quarts of 2-cycle oil was spilled by National Park Service snowmobiles alone. More than 60% of Yellowstone's snowmobile trail network runs along major rivers, lakes and streams.

Any degradation of park water quality is inconsistent with applicable law and regulation. The parks' waters are governed by state law which affords them high levels of protection. All waters located within national parks are designated as "outstanding resource waters" under Montana law; similar protections exist under Wyoming law. (Montana Code Annotated §75-5-103(20)). These "outstanding resource waters", much like Class I airsheds under the Clean Air Act, are to be protected from degradation or deterioration of water quality. "…[C]ertain state waters of such environmental ecological or economic value that the state should prohibit, to the greatest extent practicable, changes to the existing water quality of those waters. Outstanding resource waters must be afforded the greatest protection feasible under state law" (Id at §75-5-315(1)).

D. Wildlife Impacts

Impacts to wildlife from winter recreation have been documented since the onset of snowmobile use in the 1960s (Yochim, 1998). Following a review of all available data on wildlife impacts from winter recreation, Caslick (1997) concluded "there is now ample documentation to administratively close these thermally-influenced winter habitats, prohibiting winter use by private and commercial snowmachines, skiers, snowshoers, and hikers." Caslick also recommended that the Winter Use EIS "include alternatives of 'no snowmobiling' as well as…consideration of alternative modes of transport for winter visitor enjoyment of park resources." (Caslick, J. 1997.Impacts of Winter Recreation on Wildlife in Yellowstone National Park: A Literature Review and Recommendations" Planning Office Files, National Park Service, Yellowstone National Park).

Impacts to wildlife can be both direct and indirect. For many species, including elk, bison, deer, foxes, coyotes, subnivean wildlife (i.e., small rodents who live under the snowpack), swans, and eagles, snowmobile use can result in significant disturbance resulting in changes in movement and distribution patterns, habitat use, population dynamics, and energetics. In winter, the energy balance of an animal is critical to its survival. Thus, any perturbation to the animals, including disturbance by snowmobiles, can drastically impact an animal's energy reserve possibly leading to the animal's death. Collectively these

impacts can adversely affect the productivity, viability, and survival of both individual animals and animal populations.

National Park Service regulations prohibit "disturbing" living wildlife from its "natural state". (36 C.F.R. §2.1(a)(1)(i). Regulations governing snowmobile use in national parks specifically prohibit such use "except where designated and only when their use is consistent with the park's natural, cultural, scenic and aesthetic values, safety considerations, park management objectives, and will not disturb wildlife or damage park resources." (36 C.F.R. §2.18 (c)) When such damage is known to occur, the Superintendent is authorized to "regulate, restrict, or close a portion or all of a Park area to all public use if such action is necessary to protect the environment or scenic values of the Park, [and to] protect natural resources.., " 36 C.F.R. §1.5 9a) (1).

The evidence of adverse effects of winter recreation on wildlife, air resources, natural quiet, and water quality demonstrates that the parks have not heeded regulatory guidance to prevent damage to park resources by prohibiting deleterious activities like snowmobiling.

Clearly, current snowmobile use of the park is in direct conflict with the Organic Act, regulations, and National Park Service policy guidelines requiring protection of wildlife. Any continued use of snowmobiles will perpetuate adverse impacts to wildlife, contrary to Park regulatory and statutory obligation.

E. User Conflicts

In the Greater Yellowstone Coordinating Committee draft report on winter visitor use in the Greater Yellowstone Ecosystem, conflict areas between motorized and non-motorized users both within and outside of the Yellowstone and Grand Teton National Parks are identified (GYCC 1997). This information, in concert with visitor use survey data provided by Littlejohn (1996, 1996a), demonstrates that conflicts between motorized and non-motorized users occur and are critical in influencing public use and enjoyment of our National Parks. For example, in her 1995 winter surveys of Yellowstone and Grand Teton visitors, Littlejohn documented that the noise, pollution, and number of snowmobiles was frequently reported by survey respondents as what they liked least about their experience in Yellowstone and Grand Teton. Similarly, a recent survey in Grand Teton conducted for the Teton County Commission found that 96 percent of survey respondents thought snowmobiles had a negative impact on Grand Teton because of noise, pollution, disturbance to wildlife and habitat, and due to conflicts with skiers. ("Group Discusses Parks' Winter Use," Casper Star Tribune, October 29, 1998).

Park Service regulations and policies specify that recreational use of parks will be managed "so as to protect park resources, provide for public enjoyment, promote public safety, and minimize conflicts with other visitor activities and park users." (USDI 1988 at 8:2. Recreational activities which cause "unacceptable impacts on visitor enjoyment due to interference or conflict with other visitor use activities" are prohibited in national parks. Id. at 8:3. Specifically, national park snowmobile policy dictates that snowmobile use may be permitted in national parks only on designated routes and water surfaces "in locations where there will be no significant adverse impacts on the park's natural, cultural, or scenic resources and values and in consideration of other visitor uses." Id. at 8:5. Snowmobile use is inherently inconsistent with this regulation and policy.

The use of snowmobiles by some park visitors causes adverse effects to other users by virtue of air pollution, noise, crowding and commotion created by snowmobiles. The parks have received numerous complaints on this matter through the years. In order to rectify these visitor conflicts, the Park Service must

adopt access strategies, such as snowcoaches, that ensure that access to the park does not detract from other visitors' experiences.

III. Recreational Opportunities on Adjacent Lands

There are many opportunities for recreationists to enjoy winter both inside and outside the parks. Fremont County, ID, hosts 400 miles of regularly groomed snowmobile trails, 300,000 snowmobile user days/year and 40,000 days of other winter recreation. Information from the Greater Yellowstone Coordinating Committee indicates that the West Yellowstone area has about 160 miles of groomed trails, enjoyed by about 90,000 snowmobilers each year. Many of these snowmobilers never visit Yellowstone Park. The Targhee National Forest grooms up to 500 miles of trails, and has 140,000-150,000 snowmobile visits. The state of Wyoming maintains over 1,000 miles of snowmobile trails within the Greater Yellowstone area.

By contrast Yellowstone National Park maintains 180 miles of groomed road which represents just nine percent of the total groomed trail system in Greater Yellowstone. In addition there are hundreds of thousands of acres of available "play area" around Yellowstone and Grand Teton National Parks.

It is clear that in many areas outside the parks, snowmobiling is and will continue to be a prominent wintertime activity. There is little basis for the argument that snowmobiling must continue in the parks when so many opportunities for snowmobiling exist outside the parks. National Parks were designed to be the exceptions to the rule and to present visitor experiences unavailable elsewhere.

IV. Access

Certainly Americans should have the opportunity to access Yellowstone in winter. Those who choose to visit Yellowstone do so expressly to enjoy the park in its natural winter state, typified by stillness and quiet. The use of individual snowmobiles destroys the natural winter attributes of the parks. Winter transportation should be provided which is in harmony with winter in the parks. There has been a recent tendency to confuse access with recreational use. Snowmobiles as currently used are a form of recreation. The parks have a duty to determine the means of access to park attractions which cause the least damage to resources. A system of snowcoaches will provide access to the same, if not more, number of winter visitors. In no way is public access being eroded, rather a recreational pursuit is being eliminated due to its high impacts. Snowcoaches represent a less damaging mode of transportation that still allow visitor access to the parks. Indeed, the EPA in it's comment letter to the Park Service on the draft Winter Use Environmental Impact Statement said that the snowcoach-only alternative was the only one which responded to all the applicable Park Service mandates under law, regulations and executive orders. (EPA letter of comment to National Park Service)

Snowcoach transportation--which minimizes noise, air pollution, and trip frequency while maximizing educational opportunities--makes the most sense for Yellowstone in winter. These vehicles hold 10-15 people and provide opportunities for on-board education by drivers, as well as sharing among families, friends and fellow visitors. Snowcoach routes and timing can be synchronized like municipal transit systems to allow individual trip planning and quiet periods for exploring between stops.

Establishment of a snowcoach system in Yellowstone and Grand Teton will reduce overall vehicles in the parks by 90%, result in fewer vehicle miles traveled and consequently minimize impacts on wildlife. Snowcoach access also will provide better opportunities for certain segments of society that currently visit the park in winter in very low numbers, such a women, children and senior citizens.

Similar transportation alternatives are in place in Denali, and will soon be in place in Grand Canyon, Zion and Yosemite National Parks. The National Park Service should be a leader in promoting clean, quiet and affordable modes of group transportation which are protective of the natural qualities of the parks. Yellowstone in winter is a natural place to look next for expansion of the alternative transportation program already taking place in the Park Service.

V. Economic Opportunities

National parks are not islands, and as a result, changes in park management will have implications for those who work and live near Yellowstone National Park. National Park Service policy imposes a mandatory duty on the National Park Service to "anticipate, avoid, and resolve potential conflicts" with others "to protect park resources, and to address mutual interests in the quality of life for community residents, considering economic development as well as resource and environmental protections." (Policies at 2:9) However, the parks must not feel pressured to permit snowmobiling based solely on the economic benefit to local communities. National Park Service policy dictates that such alleged "beneficial effects" must be consistent with overarching "policies and management objectives". (Policies at 2:9-10).

Much of the concern raised over any reduction in snowmobiling by gateway communities is focused on potential economic impact. If snowmobiling is eliminated in Yellowstone National Park, there will still be thousands of miles of snowmobile trails on public lands within the three-state region.

The economic well-being of gateway communities is tied to the health of the parks. Americans are drawn to Yellowstone in winter by the exceptional experience a winter visit provides. Unfortunately, many visitors have chosen not to return to Yellowstone in winter because of the noxious, loud experience which snowmobile use creates. The snowcoach alternative will provide a balanced experience for visitors by providing them motorized access to the parks in the least polluting and quietest way.

Implementation of a snowcoach access proposal will provide for diversification in gateway communities. The foundation of healthy economies in surrounding communities is the presence of healthy parks offering a wholesome experience for all members of the public. A community group from West Yellowstone, MT has offered a vision of a sustainable future economy based on snowcoach access to the parks. Contrary to what some have professed, the town of West Yellowstone stands to benefit from changes in park management. Snowcoaches with rubber tracks present the opportunity to open the park earlier in the winter (snowmobiles require accumulation of a solid snowcap which generally takes until mid-December). With rubber-tracked snowcoaches, gateway communities could reap the benefits of a longer season without unpredictable opening dates.

In addition, the use of a mass transit snowcoach system will allow more visitors to enter the park, thereby creating increased economic activity in gateway towns. Certainly, marketing and publicity assistance will be necessary during the transition, as well as small business assistance for converting businesses.

The potential for increased visitation and an expanded fall season hold much promise for West Yellowstone, MT. The transition, however, can be eased through a variety of means. The

Greater Yellowstone Coalition recommends the following measures to support successful economic transition in gateway communities:

1) Marketing and publicity

a) The Park Service must undertake a publicity campaign to educate the public about changes in winter management and encourage continued visitation.

b) This effort should be matched by that of the three states and localities.

1) Economic development assistance

a) SBA low interest loans should be made available for purchase of snowcoaches and other infrastructure.

b) Snowcoach concession permits should be made available to gateway communities based on current visitation patterns.

c) Concession permits should be offered preferentially to locally owned and operated businesses interested in transition from snowmobiles to snowcoaches.

d) Job training and business development programs should be provided.

e) Partnerships among economic development agencies and local businesses to foster transition to a sustainable economy should be facilitated. .

VI. Conclusion

Our National Parks were not created in order to serve as national playgrounds, available for any and all uses. They were created to preserve "nature as it exists" (H. Rep. No. 700, 64th Cong., 1st Sess. 3 (1916)), affording Americans and people worldwide the unparalleled opportunity to see, hear and experience these national treasures in as natural a state as possible. There are more than enough areas, both on and off federal land, where snowmobiling can continue. But our unique and irreplaceable national parks should not be among those areas. Therefore, we urge this Subcommittee to support the Park Service's endeavors to protect the unique resources and visitor experiences of Yellowstone and Grand Teton National Parks.

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1. [1] Gasoline sales reported by the Montana Department of Environmental Quality in a report by Howard E. Haines. Raw fuel emissions are calculated using EPA data which confirms that 25% of the fuel "consumed" by a two-stroke engine is emitted "out the tailpipe" unburned.

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