

May 29, 2002

Winter Use Draft SEIS Comments
Grand Teton and Yellowstone National Parks
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Dear Sirs and Madams:

I respectfully submit the following comments on The Winter Use Plans Final Environmental Impact Statement for the Yellowstone and Grand Teton National Parks and the John D. Rockefeller, Jr. Memorial Parkway (FEIS) and its March 29, 2002 supplementary document (SEIS). I do so on behalf of suppliers and consumers of snowmobiles and snowmobile services in the Greater Yellowstone Area (GYA). And I do so primarily in an effort encourage the National Park Service (NPS) to develop a new rule to implement new regulations regarding snowmobile use in the GYA, upon completion of its SEIS.

As an environmental consultant, I have encountered a variety of public natural resource reallocations associated with the National Environmental Policy Act (NEPA) Environmental Impact Statement (EIS) process. To date, I do not believe I have witnessed an agency-proposed redistribution of entitlements that so inordinately burdens a single group of stakeholders. The snowmobile ban proposed in the FEIS and SEIS completely eliminates the historic and accrued use rights of the GYA snowmobile community while extending new entitlements to essentially every other group of stakeholders.

As such, I ask that you consider and subsequently respond to remarks in the three proceeding sections of this comment before rendering and publishing your November 2002 decision.

- 1. Understanding of the Rationale for the Proposed Snowmobile Ban**
- 2. Critical Analysis of the Rationale for the Proposed Snowmobile Ban**
- 3. Suggestions for Supplemental Analyses**

1. Understanding of the Rationale for the Proposed Snowmobile Ban

Presented in defense of the proposed snowmobile ban (Alternative G of the FEIS and Alternatives 1a and 1b of the SEIS) appear to be somewhat distinct legal and economic rationales, both of which obviously incorporate a large body of natural and social scientific findings. For the sake of clarity, before I offer a critical analysis, I review here my understanding of the legal and economic rationales and the general rationale for banning the private use of snowmobiles in the three affected park regions of the GYA.

Understanding of the Legal Rationale

The legal rationale for the proposed snowmobile ban, as presented in the FEIS and SEIS, appears to have been distilled primarily from language in the following statutes, executive orders, regulations, agency policy guidance documents, and case law.

- Administrative Procedures Act
- National Environmental Policy Act
- Organic Act (as amended by the Redwood Act)
- General Authorities Act
- Yellowstone National Park Act
- Grand Teton National Park Act
- John D. Rockefeller, Jr. Memorial Parkway Act
- Clean Air Act
- Endangered Species Act
- Executive Order 11644 – Use of Off-Road Vehicles on the Public Lands
- Executive Order 11989 amendments to Executive Order 11644
- 36 CFR 1-2
- 40 CFR 1500-1508
- National Park Service Management Policies 2001
- State of Montana regulations for NAAQS pollutant standards and authorizing statutes
- Fund for Animals et al. v. NPS
- International Snowmobile Manufacturers’ Association et al. v. Secretary of the Interior et al.

This body of law relates directly or indirectly to the NPS management of “park resources and values” and the “impairment” of park user benefits such as air quality/visibility, soundscapes, wildlife abundance, water resources, visitor safety, and overall visitor experience.

Specifically, the legal rationale for the proposed ban on snowmobile use in GYA appears to rest heavily on 1) NPS’s interpretation of its duty to prevent the impairment of air quality and visibility in the three park regions, and 2) NPS’s reference to modeled ambient air quality numeric standards violations due to emissions of CO and HC on peak snowmobile use days under critical atmospheric conditions and where worst-case emission reduction technologies are assumed.

Supporting the air-quality element of the legal rationale to ban snowmobiles are other more subjective references to impairment to park resources. These include bison impairments due to harassment and collision, unreasonable soundscape impairments due to snowmobile noise, and visitor safety impairments resulting from improper snowmobile operation. These “impairments” as legal rationales for banning snowmobiles seem to be presented with a lesser conviction by the NPS, as none are actually supported by any universally accepted or legally mandated numeric standards.

In summary, in support of its proposed snowmobile ban, the NPS claims that the feasibility of the adoption of “clean and quiet” standards for the manufacture and operation of snowmobiles is too uncertain to assure prevention of “impairment” to “park resources and values”, particularly with respect to air quality resources.

As Glen Loomis, a West Yellowstone merchant has pointed out, “For this reason, many of the conclusions are driven by jumping from a perceived problem to simply banning snowmobiles. NEPA clearly requires consideration of mitigation of impacts. This should be done before establishing specific limits or banning certain activities.”

Understanding of the Economic Rationale

The economic rationale for the proposed snowmobile ban, as presented in the FEIS and SEIS, appears to be supported primarily with references to findings in a selected set of surveys, models, datasets, and studies. The following appear to be key among them.

- “Winter 1998-1999 Visitor Survey Yellowstone National Park, Grand Teton National Park, and the Greater Yellowstone Area”
- “2000-2001 Wyoming Snowmobile Survey” (2001)
- IMPLAN input/output county-level economic impact model (1996)
- Data from NPS on winter visitor records
- Data from NPS, OSHA, and NIOSH on employee health and safety
- “Winter Bison Monitoring” (2001)
- “Technical Report on Noise: Winter Use Plan FEIS” (2001)
- “Review of Research related to the EIS for the Yellowstone and Grand Teton National Parks and the John D. Rockefeller, Jr. Memorial Parkway” (2000)
- Numerous studies primarily focused on identifying and characterizing adverse effects of snowmobile use on environmental quality and visitor safety

This body of social and natural science directly or indirectly provides an objective foundation whereby determinations of “park resource and value impairments” might be made.

Specifically, the economic rationale for the proposed ban on snowmobile use in GYA appears to have been drawn from 1) foregone benefit estimates associated with natural scientific findings of negative impacts from snowmobile use, 2) limited data of stated preferences for winter uses, and 3) county-level models of economic impacts to the GYA.

Park users for which benefits are forgone due to snowmobile use include those visitors that travel by non-motorized means seeking unaffected soundscapes, wildlife enthusiasts or researchers valuing animals and animal communities devoid of anthropogenic influence, and individuals that are both relatively sensitive to air pollutants and that also visit park areas where snowmobiles congregate. Such restored benefit estimates do not appear to have yet been compared with lost benefits to snowmobile users in any analytical way that might produce a comparative benefit estimate.

In terms of cost estimates, county-level input/output models were utilized to estimate job and revenue losses associated with the snowmobile ban. The economic rationale rests heavily on the NPS estimate that in the 3-state and 5-county Yellowstone area, less than 1% annual job and revenue loss will result from the ban.

The absence of data and analyses available to produce reasonable monetized cost-benefit estimates for alternatives comparison seems somewhat obfuscated in the economic rationale by NPS claims of legal prohibitions of alternatives allowing snowmobile use. NPS does not appear to make claims of “economic efficiency” or “maximum net benefit”. Rather, NPS points to its limitations in considering alternatives based on 1) interpreted legal constraints to protect park resources and 2) time restrictions in analyzing and incorporating new information.

Understanding of the General Rationale

In general, NPS presents a rationale for the proposed snowmobile ban that makes no claims about maximizing net benefits in the GYA. NPS essentially presents all of the information it reviewed in proposing its snowmobile ban alternative and identifies the “environmentally-preferred alternative”, Alternative G from the FEIS and Alternative 1a from the SEIS. It appears that previous and current snowmobile ban proposals in the absence of legally required cost and benefit data are defended with claims of alternative elimination by *de facto* legal mandate.

It is my understanding, however, that new data regarding the introduction of a newer fleet of “clean and quiet” snowmobiles into the marketplace appears to have successfully challenged this claim. And a full “cost-and-benefit analysis” supporting the NPS’s upcoming preferred alternative will accompany its final rule in November 2002.

2. Critical Analysis of the Rationale for the Proposed Snowmobile Ban

The general criticism of the NPS’s proposed snowmobile ban offered here is that this redistribution of GYA winter use rights is inordinate and has neither a sound legal or economic foundation.

Critical Analysis of the Legal Rationale

Certain key words, phrases, and concepts common throughout the body of the written law that governs GYA snowmobile use obviously required and will continue to require thoughtful interpretation by the NPS. This is especially true given the NPS’s apparent legal authority under its adaptive management policy to reinterpret such words and phrases, subsequent to the NEPA process, as new scientific information surfaces or old analyses are refined.

Critical to determining the federal government’s legal obligations and limitations are still open interpretations of such words and phrases as “park resources”, “park values”, “resource impairments”, “unacceptable impacts”, “preserve resources”, “protect air

quality”, “sustain enjoyment”, “experience enjoyment”, “high-quality opportunities”, “visitor experience”, “unreasonably interfere”, “where necessary and inappropriate”, “professional judgment”, etc. These concepts are obviously highly subjective and dynamic and rarely referenced with universally accepted numeric standards.

Yet plentiful in the public dialogue are claims of *de facto* legal mandates to ban the private use of snowmobiles in GYA based on these subjective and dynamic concepts. For example, there have been claims that certain predicted (not observed) state ambient air quality standards violations render the snowmobile ban the NPS’s only legal alternative.

In a letter and attached comments sent to Steven F. Iobst of the NPS from Max H. Dodson of the EPA dated April 23, 2002, the following statement is made. “DSEIS modeling indicates a potential exceedance of National Ambient Air Quality Standards (NAAQS) and Montana Ambient Air Quality Standards (MAAQS) for alternatives 1b, 2, and 3 in the first implementation year.” This information appears to be the quantitative cornerstone of the FEIS legal rationale for private snowmobile elimination in GYA. And it continues to be promoted by EPA as a rationale for eliminating the interim snowmobile allowance.

Although the public may not be certain, NPS should be certain that the federal government has no legal authority here under the Clean Air Act nor does the State of Montana have the legal authority to impose emission limits in excess of federal technology standards on vehicles in the absence of demonstrated standards violations. As documented in a March 15, 2002 letter from Howard E. Haines of the Montana Department of Environmental Quality to Bill Howell of West Yellowstone, Montana, “...the Montana Department of Environmental Quality has not monitored any exceedances of National Ambient Air Quality Standards (NAAQS) or the Montana Ambient Air Quality Standards (MAAQS) for carbon monoxide since monitoring began in 1998.”

NPS reports that under the snowmobile-banning SEIS Alternative 1, there would be an eventual one-quarter reduction in NAAQS pollutants, while only three-quarters of this cut would occur under snowmobile-limiting SEIS Alternative 2. Statement of this marginal comparison is legally irrelevant. SEIS Alternative 2, and for that matter FEIS Alternative A (the original no-action alternative), do not coincide with federal or state ambient air quality standards violations. Such violations have never been observed.

Clearly, there is no direct or indirect absolute mandate to ban snowmobile use in the three-park area in the interim or in perpetuity.

This is evidenced in the facts that 1) snowmobile use in GYA increased for decades without significant formal contest prior to the 1997 action taken by Fund for Animals et al., 2) the 1997 action resulted in the call for the development of an Environmental Impact Statement (EIS) rather than an injunction, and 3) a Federal Court in Wyoming has

ordered the NPS to reevaluate the EIS and reissue the January 2001 Record of Decision (ROD) due to emerging scientific findings regarding future snowmobile emissions.

In this absence of a clear legal mandate to either ban or limit, or for that matter expand snowmobile use in GYA, the ongoing redistribution of user rights in the GYA should be highly contingent on adequate findings of marginal costs and benefits and their allocations. This is consistent with the body of federal law governing this issue. To date, this has not been the case.

Critical Analysis of the Economic Rationale

The economic rationale for the proposed snowmobile ban, as presented in the FEIS and SEIS, appears not to have yet been reconciled with emerging information found in more recent surveys, models, datasets, and studies. The following appear to be key among them.

- “American Voters Views on Snowmobiles in National Parks”
- Oversnow vehicle sound level measurements from the State of Wyoming
- New data on snowcoach emission factors from the State of Wyoming
- New data regarding future snowmobile emissions from snowmobile manufacturers
- New data regarding future snowmobile emissions from Southwest Research Institute
- New data regarding future snowmobile emissions from the State of Montana
- New data regarding fuel consumption and emissions comparisons between the Arctic Cat 4-stroke snowmobile and the Ford 2000 snowcoach from Clyde Seely
- New data showing graphically the excess demand for snowmobile use resulting in proposed daily snowmobile visitor caps from Clyde Seely
- New data on common snowcoach and snowmobile sound levels at the South Gate community from Jackson Hole Scientific Investigations
- New data on economic impacts from the State of Wyoming
- “An Expert Opinion on the Reasonableness of the Cooperating Agencies’ Alternative #2 for Inclusion in the Winter Use SEIS” (2001)
- “After-Market Improvement of 2-stroke Snowmobiles”
- “Status and Potential of 2-stroke Technology in Montana”
- “Comparison of CO Emissions from Snowcoaches, 1997 and 2001 Clean Snowmobile Challenge New Technology and Applications”
- “The Electric Snowmobile Demonstration Project”
- “Economic Importance of the Winter Season to Park County”

In reviewing this new body of work, it is obvious that the natural and social scientific information used in this EIS process to date has been inadequate for the purposes of formulating and evaluating competing alternatives. Numerous throughout this process are examples of 1) contradictory and incomplete scientific conclusions, 2) omitted snowmobile-use market observations, and 3) inappropriate economic output model applications.

Recent snowcoach and late-model snowmobile noise and emissions comparison studies offer an excellent example of contradictory scientific conclusions. NPS science predicts per-person pollutant emissions from the emerging class of snowmobiles to be in excess of emissions from snowcoaches. Several recent findings have demonstrated just the opposite.

In an exhibition this year at the third annual Clean Snowmobile Challenge, scientists from Colorado State University demonstrated that a modestly priced adaptation to a conventional snowmobile has the potential to reduce its CO emissions by over 90% and its HC emissions by 89%. According to the Wyoming Snowmobile Survey, more than half of snowmobile owners and renters would be willing to pay a higher price to operate cleaner and quieter snowmobiles. These two pieces of information together clearly demonstrate that NPS conclusions regarding predicted future air quality in the GYA in the absence of a snowmobile ban are erroneous.

In fact, data submitted to NPS by Clyde Seely in a letter dated April 19, 2002 on comparative per-person pollutant emissions between 4-stroke snowmobiles and 2000 Ford van conversion snowcoaches demonstrate that the proposed snowmobile ban and theoretic snowcoach substitution would actually increase total emissions.

Consider this comparative data on the emissions of snowmobiles currently entering the marketplace under market conditions and snowcoaches that by NPS's own admission will only be utilized in GYA if significant public subsidies are provided. Affordable new four-stroke snowmobiles have a demonstrated capability of HC emission reductions in the 70-95 percent range and CO emission reductions in the 60-80 percent range. As demonstrated in the data submitted to NPS by Clyde Seely, 2000 Ford van conversion snowcoaches are predicted to emit 112.5% the pollutants of these market demanded snowmobiles on a per-person basis.

These illustrations and the several others not mentioned here are symptomatic of the major deficiency in this EIS process. Analysts have not made use of the most reliable data available to estimate park user benefits among alternatives. The most recent science and actual market demand as observed through price are essential in providing the best available estimates for comparison of the GYA's potential winter-use benefits. Both remain largely absent in the SEIS.

The SEIS states on page 148, "Alternatives 2 and 3 are particularly complicated by not having survey data on winter visitor opinions and reactions specific to them." I offer that winter visitor opinions about how they value snowmobile and snowcoach opportunities respectively might better be estimated by simply observing the GYA winter use market that currently exists.

Analysts in this process seem almost to find stated preference data more desirable than observed preference data. Should not every opportunity to derive benefit estimates from actual demand be exhausted before resorting to estimates via shadow pricing? Not all winter uses in GYA are non-market values. In fact, most are relatively easily observed

market values. Will NPS make use of actual market data that indicate relative winter-use preferences in any future cost-benefit analysis?

Most unsettling in the economic rationale presented by NPS in its proposal to ban snowmobiles in the GYA is its finding that no proposed alternative will have a significant adverse impact on a substantial number of small business.

The best estimate I am aware of has 70 businesses in the four gateway communities wholly or partially dependent on revenues from snowmobile use in GYA. By NPS published estimates, almost 60% of snowmobile users claim they would visit the GYA less frequently if snowmobiles are banned from GYA. NPS's own estimate acknowledges over a \$21 million dollar loss of output that would be concentrated in small gateway communities including and especially West Yellowstone, Montana.

The SEIS states, "In the context of the total GYA economy, expenditures by winter park visitors (and the additional economic activity that spending indirectly generates or induces) is a small portion of total GYA annual economic output. The direct, indirect, and induced expenditures generated in the GYA by nonresidents visiting the parks in the winter months are estimated at about \$63,000,000. In the context of the \$5.7 billion dollar annual output of the 5-county economy, this represents 1.1% of the total (Minnesota IMPLAN group, County-level data 1996)". The SEIS goes on to characterize this economic impact as "insignificant".

NPS's most recent economic impact analysis document states "NPS does not believe any of the entities will be disadvantaged relative to other operators because, within the context of the RFA, almost all operators are small regardless of their size relative to one another, and the costs of this regulation proportional to revenue are expected to remain relatively constant across different size firms."

This is essentially equivalent to concluding that 1) because the economic impacts can be diluted in an analysis by selective delineation of the area of consideration, and 2) because a ban on snowmobiles will eliminate, albeit relatively equally, all snowmobile outfitting enterprises (that by NPS estimates depend on snowmobile rentals for 92% of their winter business), there is "no significant economic impact."

A more careful consideration of the impacts of the proposed snowmobile ban, such as the one done recently by Montana's Bureau of Business and Economic Research, reveals the following about GYA community impacts. "About \$33 million of the nonresident expenditures from snowmobiling occur in West Yellowstone. Restricting the number of individuals in Yellowstone Park may result in a decline of non-resident expenditures of between 10 and 15 million dollars. This decline assumes that some of the snowmobilers may be replaced by other winter users. These expenditure estimates translate into losses of between 2 and 4 million dollars in labor income, affecting winter employment opportunities in West Yellowstone; full-time jobs may become part-time and part-time jobs may cease to exist. As many as 150 jobs may be involved if the National Park Service limits snowmobiling in the Park."

Further revelations concerning the significance of economic impacts that threaten the general welfare of the four Yellowstone gateway communities were presented at a January 26, 2002 public meeting convened by the U.S. House of Representatives Committee on Small Business.

Testimony included that of snowmobile and snowmobile service suppliers in the east, south, and west Yellowstone gateway communities.

Robert Coe of east-gateway Pahaska TeePee Resort provided testimony stating, “Effects of a snowmobile ban on my business at Pahaska would be catastrophic. Winter season accounts for 30% of our yearly revenue.”

Robert Walker of south-gateway Flagg Ranch Resort provided similar testimony. “The limitation and eventual elimination of our contractual authorization to rent snowmobiles will result in a substantial financial loss to Flagg Ranch and will force us to close down during the winter season. We have estimated that this will cause a reduction in our gross revenues of 25%, a reduction in our gross income of 30%, and a reduction in our total net income of 50%.”

Most alarming was the testimony of Clyde Seely of west-gateway Yellowstone Tour and Travel. “I currently employ over 220 people, many with families. Our payroll is in excess of \$2.5 million dollars... At Three Bear Lodge 52 % of our total annual revenue comes from three winter months. We believe that a ban on snowmobiles would cut our winter revenue by 60-70 percent...” Mr. Seely also testified that based on his estimates of previous business, the proposed 330 visitor per day cap “would (have) equate(d) to an economic loss (to the West Yellowstone community) of between \$7 and \$8.5 million during each of the years from 1995 to 2001 (not accounting for multiplier effects).”

It is incomprehensible that rational people would characterize these findings of economic impact as “insignificant” rather than “devastating”. As I stated in the introduction to this comment, I have never witnessed in an EIS process an agency-proposed redistribution of entitlements that so inordinately burdens a single group of stakeholders.

Finally, and potentially of legal consequence, NPS has arguably advanced its “environmentally preferred alternative” thus far in the absence of its cost-benefit analysis requirements under the National Environmental Policy Act and Executive Order 12866 – Regulatory Planning and Review. Although NPS is not required by either law to select the alternative that “maximizes net benefits”, it is required to exhaust every reasonable opportunity to arrive at relative net benefit estimates for each alternative and provide a clear explanation of why, if applicable, it was not selected.

Is this forthcoming, or will the public only have the information from the currently available analyses that compare only two alternatives, ban or severely limit snowmobile use in GYA?

3. Suggestions for Supplemental Analyses

In the event that 1) net benefit estimates of respective FEIS and SEIS alternatives will be generated, and 2) a new comprehensive community-level rather than county-level economic impact study will be conducted as a part of a forthcoming full cost-and-benefit analysis and economic impact analysis, I offer the following suggestions to the NPS for supplementing its current analysis to those ends.

- Estimate benefits of Alternative A from the FEIS along with the alternatives included in the SEIS. Do so with projections of both snowmobile user expansion in the GYA and anticipated snowmobile technological advancements such as those described in the Snowmobile Challenge anecdote presented in section 2 of this comment.

Given recent disclosures regarding the data and analyses utilized prior to this point, and given the dramatic reallocation of GYA winter use entitlements that has resulted from this compromised EIS process, it seems only reasonable that the no-action alternative – the starting point in this negotiation process – be current snowmobile visitation and technology levels.

- Utilize observed preference data to generate winter user benefits, first. Then supplement with survey data to account for non-market values.

Exclusively querying visitors directly about how they value their tradeoffs between higher impact park recreation and park conservation is unnecessary when observation data are readily available, and it introduces greater inaccuracy.

At fundamental issue here is market equilibrium and alleged market diseconomies. Indisputably, in the coarsest terms, maximum net benefits associated with the distribution of winter rights in the GYA are consistent with current snowmobile and non-snowmobile winter-use visitation. The public has already expressed its collective preference for winter use in GYA. It is for high and growing levels of snowmobile use.

Granted, a regulated market such as the market for winter uses in GYA that is being threatened by a coalition of individuals willing to expend resources to alter it politically has alleged measurable spillover effects or externalities. In other words, it is acceptable, albeit disputable, that the NPS intervene in the GYA winter use market that they regulate to attempt to eliminate these diseconomies. It is not, however, acceptable for the NPS to manufacture a regulated-market equilibrium with only survey data and proceed to marginally redistribute user rights in the name of maximizing net benefits and eliminating diseconomies. It is illogical and arguably illegal.

- Conduct an independent comprehensive community-level economic impact study for the four gateway communities.

Given the obvious uselessness of county-level input/output modeling to arrive at an understanding of redistribution resulting from this EIS process, and if as reported, the

multiplier utilized in the input/output model is inappropriate in its application to West Yellowstone, such an analysis is clearly in order. As is the case in arriving at estimates in the cost-benefit analysis process, estimates of economic impact must be benchmarked from current market indicators of economic output and employment. Chapters III and IV of the SEIS are filled with speculation about the substitution of snowmobile use by snowcoach visitors, speculation that is seemingly translated into analytic statements about mitigating impact effects. There is no analytical evidence presented that one single current or potential future snowmobile user will ever step foot in a snowcoach in the GYA.

Granted here as well, “some” number of individuals almost certainly will. But it is incumbent on NPS to estimate what number that is in some analytical framework before making such dramatic redistributions among winter-use outfitters’ economic entitlements. Truly “insignificant economic impact” is commensurate with current snowmobile visitation. To pursue a policy of redistribution of this magnitude under the unsubstantiated premise of “insignificant” impact is illogical and arguably illegal.

- In summary, consider the distribution of marginal costs and benefits in the issuance of the November 2002 rule if the decision is made to choose among lesser efficient alternatives. And again, before estimating any more marginal cost-benefit or economic impact figures, first return the margin to the more appropriate FEIS Alternative A.

In event that, given all of these considerations, the NPS elects to forego the development of a new rule and that 1) more accurate net benefit estimates of respective FEIS and SEIS alternatives will not be generated, and 2) a new comprehensive community-level rather than county-level economic impact study will not be conducted as a part of a new more comprehensive and competent cost-benefit analysis and economic impact analysis, I offer this observation to the NPS.

A daily use cap of 900 snowmobile visitors, as one proposal under Alternative 2 has it, is a significant compromise in use rights on the part of snowmobile and snowmobile service suppliers and consumers in the GYA.

Best available evidence suggests that concession by the GYA snowmobile community to relinquish their historic and accrued winter use rights is a move away from maximizing the public’s net benefits. Quite simply, I cite current regulated-market conditions and the lack of evidence of diseconomies presented by the NPS. As such, a visitation cap more stringent than 900 visitors is a measure consistent with further diminishing the public’s winter use benefits. It too would be illogical and arguably illegal.

I thank you for your time in considering my comments.

Sincerely,

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