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November 24, 2015

Congressman Rob Bishop, Chairman
Committee on Natural Resources
House of Representatives
Washington, D.C. 20515

Dear Congressman Bishop,

Packrafters and other paddlers would like to offer a response to NPS Director Jon Jarvis's letter dated November 13, 2015 opposing H.R. 974, the Yellowstone and Grand Teton Paddling Act. We appreciate Director Jarvis's concerns and his agency's work administering our National Parks. However, we disagree with his conclusions about H.R. 974 and river paddling in Yellowstone and Grand Teton national parks. We strongly urge members of Congress to look closely at this issue.

Director Jarvis states, "There may be no other scenic resource like this…where visitors can experience large intact river systems and their environments…" Yellowstone and Grand Teton's river resources are indeed exceptional; arguably no other Park in the lower 48 compares. However, the reality is that visitors are prohibited from floating harmlessly downstream and truly experiencing them. Instead, these rivers must be "experienced" from the riverbank or through the windshield of an automobile.

The Director implies that paddlers would damage the rivers' "…wild, ecologically pristine state," but fails to mention that anglers, backpackers, campers, and horsemen already visit these river corridors. How does the addition of well-managed paddling suddenly taint the wildness and pristineness of rivers that already are being used by other recreationists? The NPS considers managed paddling to be entirely appropriate in every other national park in the nation. Why not in Yellowstone and Grand Teton? The NPS has not provided an answer to that question, which is why H.R. 974 is necessary.

Director Jarvis has prematurely and inappropriately drawn conclusions about the impacts of paddling in these Parks without his agency ever having done a thorough analysis. In 2012, the NPS illegally made similar presumptions about paddling in their Comprehensive River Management Plan for the Snake River headwaters, which was designated a Wild and Scenic River in 2009. In this plan, the Parks were required, under Wild and Scenic law, to take a close look at river-corridor recreation, but dismissed paddling, citing their obsolete 65-year-old ban.

The NPS's dismissal of a river paddling analysis reveals inattention to their basic mission and a lack of stewardship for resources that are nothing less than a river paradise. A bizarre lack of river paddling information and management in Yellowstone, coupled with the odd scarcity of approved river paddling opportunities is confusing for visitors. It has led to illegal river running, accidents by uninformed and unprepared visitors, and costly enforcement and rescue efforts.

H.R. 974 is a legislative check on a substantial agency error, and therefore sets no unsavory precedent. Nor does the bill in any way "diminish the ability of park managers to meet their responsibilities." H.R. 974

holds the Parks accountable to become diligent stewards of a carefully selected set of suitable and amazing river resources. As written, the bill would trigger the standard National Environmental Policy Act (NEPA) process to first study and then promulgate rules allowing paddling where and when appropriate. There is no mandate to open any stretch to paddling. The bill thoughtfully preserves the unique "scenic resource" by removing nearly all rivers that are visible from Park roads from consideration for paddling. Motor tourists, who account for the vast majority of all YNP and GTNP visitation, would still be able to enjoy the roadside vistas without seeing paddlers on the rivers. Meanwhile paddlers could intimately experience backcountry rivers at appropriate levels as determined by the bill's required three-year analysis.

Paddlers share Director Jarvis's concerns about nesting, breeding, and spawning wildlife. If H.R. 974 passes, the analysis of river-corridor recreation would determine where and when paddling, angling, camping, backpacking, and horseback riding were appropriate, and at what proportions, to protect and sustain natural processes. Paddlers also share concerns about aquatic invasive species (AIS), but evidence shows that small paddle craft should be last on the list of activities to scrutinize. Current AIS infections in YNP and GTNP are found in popular motor boating and angling areas, and these epidemics developed during the 65-year period that river paddling has been banned. Hence, there is no precedent attributing the spread of AIS to small paddle craft. Moreover, at least a dozen streams to be considered for paddling in H.R. 974 flow from adjacent National Forest lands INTO the Parks. Legal paddling activity has been occurring on these streams for decades with no known AIS infection. So if small paddle craft were a real AIS threat, it would have already happened because of paddling activity on the streams that flow from upstream National Forest lands into the Parks. Coordinated ecosystem-level inter-agency management and education (stewardship) about these "water trails" that cross management jurisdictions would significantly reduce the risk of introduction of aquatic invasive species.

Paddlers do not share Director Jarvis's opinion that the 169 lakes open to paddling in these Parks constitute adequate opportunities. Lake paddling and river paddling are entirely different activities. Director Jarvis's reference to "60,000 people" who enjoy floating the Snake River warrants clarification. The vast majority of this count consists of people who pay for commercial raft trips on two short stretches of the Snake River. This number only confirms that GTNP needs to provide more opportunities for non-commercial small-craft paddling on remote rivers without the commercial crowds. H.R. 974 does just that.

In closing, this bill does not cater to just a "small group of recreational paddlers," as the Director stated. This bill would afford EVERY interested and able American the opportunity to experience "large intact river systems and environments in a wild, ecologically pristine state." Paddlers request Congress to pass H.R. 974 for the benefit of all who enjoy recreating in Yellowstone and Grand Teton national parks, and for the stewardship and preservation of the amazing resources found there.

Sincerely,

Brad Meiklejohn
President
American Packrafting Association

cc: Senator John Barrasso
Senator Mike Enzi
Congressman Raul Grijalva
Director Jon Jarvis
Congressman Cynthia Lummis

United States Department of the Interior

NATIONAL PARK SERVICE
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Washington, DC 20240

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The Honorable Rob Bishop
Chairman
Committee on Natural Resources
House of Representatives
Washington, DC 20515

Dear Mr. Chairman:

The National Park Service (NPS) is strongly opposed to H.R. 974, the Yellowstone and Grand Teton Paddling Act, which was reported from the House Natural Resources Committee on October 8, 2015. The bill requires the NPS to promulgate regulations to allow the use of hand-propelled vessels, at a minimum, on 50 specific river segments in Yellowstone and Grand Teton National Parks, as well as the John D. Rockefeller, Jr. Memorial Parkway. The bill would diminish the ability of park managers to meet their responsibilities under the NPS Organic Act and other laws to provide for public enjoyment, ensure visitor safety, and address adverse effects to resources at those units and also would set a poor precedent for the NPS.

The areas required to be opened to paddling by H.R. 974 represent some of the most intact, pristine landscapes in the contiguous United States and include rivers such as the Lamar, Yellowstone, and Gros Ventre. There may be no other scenic resource like this in the United States, and possibly the world, where visitors can experience large intact river systems and their environments in a wild, ecologically pristine state. These rivers are sensitive nesting and breeding grounds for wildlife, home to endemic and endangered species, spawning grounds for native cutthroat trout, and some of the last streams in the Greater Yellowstone Ecosystem for Arctic grayling. Opening these waterways will increase the risk of the transmission of aquatic invasive species like zebra and quagga mussels, Eurasian watermilfoil, whirling disease and others.

By mandating that the NPS allow paddling on these 50 waterways, the interests of a small group of recreational paddlers would be placed above those of all other Americans and above the protection of these fragile resources. The NPS has a statutory responsibility under the NPS Organic Act to ensure the protection in perpetuity of the fundamental values and resources for which Congress established these parks. By mandating that the NPS open these 50 waterways for the benefit of a very select few, Congress would undermine the ability of professional park managers and the public to determine how best to manage these special places.

Enjoyment of the national parks through a wide variety of appropriate recreational opportunities is a core part of the NPS mission, and one which we fully embrace. In addition to opportunities for hiking, photography, wildlife viewing, scenic touring, camping, bicycling, and many other activities, both Yellowstone and Grand Teton already offer many outstanding places for hand-propelled paddling. In Yellowstone, 163 of the 168 lakes in the park are open for boating and on

average over 2,000 permits are issued annually for non-motorized boating. In Grand Teton, over 60,000 people enjoy floating the iconic 26-mile segment of the Snake River along the Teton Range each year, and many more enjoy paddling on the lakes that are open to paddling, six of which are located entirely in the park's backcountry.

H.R. 974 would set a very poor precedent that would affect the ability of park superintendents to meet their statutory responsibilities to properly manage the use of our national park lands. The NPS believes strongly that the existing authority granted by Congress through the Organic Act is sufficient and appropriate for the proper management of these lands for all Americans.

Sincerely,

Jonathan B. Jarvis
Director

cc: Honorable Raul Grijalva, Ranking Member