



**Yellowstone National Park**  
**Winter Use Plan/Environmental Impact**  
**Statement Draft Public Scoping Comment**  
**Analysis**

**VOLUME 1**

July, 2010



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## INTRODUCTION AND GUIDE

### INTRODUCTION

In the winter of 2010, Yellowstone National Park (Yellowstone or the park) initiated scoping with the publication of a Notice of Intent to Prepare a Winter Use Plan and Environmental Impact Statement in the *Federal Register* on January 29, 2010. The park also released a Public Scoping Brochure and activated the project on the National Park Service (NPS) Planning, Environment and Public Comment (PEPC) website (<http://parkplanning.nps.gov/yell>). In addition to being available online, the brochures were mailed and emailed to a list of park stakeholders and were available at a series of public scoping meetings. The public was invited to submit comments on the scope of the planning process (purpose, need, objectives, and range of alternatives) from January 22, 2010, through March 30, 2010.

During the scoping period, five public scoping open houses were held at the following locations:

February 16, 2010: Hilton Garden Inn in Idaho Falls, Idaho

February 18, 2010: Hilton Garden Inn in Billings, Montana

March 15, 2010: Little America Hotel in Cheyenne, Wyoming

March 17, 2010: Old Post Office Pavilion in Washington, DC

March 22, 2010: Cody Club Room of the Cody Auditorium in Cody, Wyoming

Park staff was on hand at all five meetings to answer questions and provide additional information to open house participants. During the scoping period, 1,689 pieces of correspondence were entered into the PEPC system, either from direct entry by the commenter, or uploading of hard copy letters, and comment forms sent in by the public. In addition, 7,410 form letters were submitted electronically on CDs. Therefore, in total, 9,099 pieces of correspondence were received during scoping.

### THE COMMENT ANALYSIS PROCESS

Comment analysis is a process used to compile and correlate similar public comments into a format that can be used by decision makers and the Interdisciplinary Team (IDT). Comment analysis assists the team in organizing, clarifying, and addressing technical information pursuant to *National Environmental Policy Act* (NEPA) regulations. It also aids in identifying the topics and issues to be evaluated and considered throughout the planning process.

The process includes five main components:

developing a coding structure

employing a comment database for comment management

reading and coding of public comments

interpreting and analyzing the comments to identify issues and themes

preparing a comment summary

A coding structure was developed to help sort comments into logical groups by topics and issues. The coding structure was derived from an analysis of the range of topics discussed during internal NPS scoping, past planning documents, and the comments themselves. The coding structure was designed to capture all comment content rather than to restrict or exclude any ideas.

The NPS PEPC database was used for management of the comments. The database stores the full text of all correspondence and allows each comment to be coded by topic and issue. Outputs from the database include the total number of correspondences and comments received, sorting and reporting of

comments by a particular topic or issue, and demographic information for the sources of the comments.

Analysis of the public comments involved the assignment of the codes to statements made by the public in their letters and written comment forms. All comments were read and analyzed, including those of a technical nature; opinions, feelings, and preferences of one element or one potential alternative over another; and comments of a personal or philosophical nature.

Although the analysis process attempts to capture the full range of public concerns, this content analysis report should be used with caution. Comments from people who chose to respond do not necessarily represent the sentiments of the entire public. Furthermore, this was not a vote-counting process, and the emphasis was on the content of the comment rather than the number of times a preference was expressed.

Several organizations submitted letters electronically on compact disks. These totaled approximately 7,400 correspondences. The letters were reviewed, and comments from non-form letters were entered into the PEPC system. The form letters were coded and entered into the PEPC system as a group.

### DEFINITION OF TERMS

Primary terms used in the document are defined below.

**Correspondence:** A correspondence is the entire document received from a commenter. It can be in the form of a letter, written comment form, note card, open house transcript, or petition.

**Comment:** A comment is a portion of the text within a correspondence that addresses a single subject. It could include such information as an expression of support or opposition to the use of a potential management tool, additional data regarding the existing condition, or an opinion debating the adequacy of an analysis.

**Code:** A grouping centered on a common subject. The codes were developed during the scoping process and were used to track major subjects.

**Concern:** Concerns are statements that summarize the issues identified by each code. Each code was further characterized by concern statements to provide a better focus on the content of comments. Some codes required multiple concern statements, while others did not. In cases where no comments were received on an issue, the issue was not identified or discussed in this report.

**Quotes:** Representative quotes that have been taken directly from the text of the comments received from the public and further clarify the concern statements. Quotes have not been edited for grammar.

### GUIDE TO THIS DOCUMENT

This report is organized as follows.

**Content Analysis Report:** This is the basic report produced from PEPC that provides information on the numbers and types of comments received, organized by code. The first section of the report provides a summary of the number of comments that were coded under each topic. The second section provides general demographic information, such as the states where commenters live, the number of letters received from different categories of organizations, etc.

**Public Scoping Comment Summary:** This report summarizes the substantive comments received during the scoping process. These comments are organized by codes and further organized into concern statements. Below each concern statement are representative quotes, which have been taken directly from the text of the public's comments and further clarify the concern statements.

**Correspondence Index of Organizations**: This provides a listing of all groups that submitted comments, arranged and grouped by the following organization types as defined by PEPC (and in this order): businesses; churches and religious groups; civic groups; conservation/preservation groups; federal government; NPS employees; non-governmental groups; recreational groups; state government; town or city government; tribal government; unaffiliated individuals; university/professional society. Each piece of correspondence was assigned a unique identification number upon entry into PEPC. This number can be used to assist the public in identifying the way NPS addressed their comments.

**Correspondence Index of Individual Commenters**: This provides a listing of all of the individuals who submitted comments during the public scoping period. Like the previous index, each correspondence was assigned a unique identification number which can be used to assist individuals in identifying the way in which NPS addressed their comments. This list is organized alphabetically.

**Index By Organization Type**: This list identifies all of the codes that were assigned to each individual piece of correspondence and is arranged by organization type. Individual commenters are also included in this report and are identified as Unaffiliated Individuals.

**Index by Code**: This lists which commenters or authors (identified by PEPC organization type) commented on which topics, as identified by the codes used in this analysis. The report is organized by code, and under each code is a list of the authors who submitted comments that fell under that code, and their correspondence numbers. Those correspondences identified as N/A represent unaffiliated individuals.

## CONTENT ANALYSIS REPORT

**Table 1: Comment Distribution**

**(Note: Each comment may have multiple codes. As a result, the total number of comments may be different than the actual comment totals)**

Code	Description	# of Comments	% of Comments
AE12000	Affected Environment: Wildlife And Wildlife Habitat	208	1.49%
AE21000	Affected Environment: Socioeconomics	259	1.86%
AE22500	Affected Environment: Visitor Use and Experience	423	3.04%
AE30000	Affected Environment: Health and Safety	19	Less than 1%
AE7000	Affected Environment: Air Quality	64	Less than 1%
AE8000	Affected Environment: Visual Quality	64	Less than 1%
AE8100	Affected Environment: Soundscapes	121	Less than 1%
AE8500	Affected Environment: Park Operations	20	Less than 1%
AE9500	Affected Environment: General/Other	41	Less than 1%
AL4050	Alternatives: No Action (No OSV Use)	1	Less than 1%
AL4060	Alternatives: No Action (No OSV use) (Non-substantive)	9	Less than 1%
AL5000	Alternatives: Continue Recent Use Levels	79	Less than 1%
AL5005	Alternatives: Keep the park open to OSV use (either snowmobiles or snowcoaches)	418	3.00%
AL5010	Alternatives: Support More Snowmobiles	65	Less than 1%
AL5015	Alternatives: Support Less Snowmobiles	48	Less than 1%
AL5020	Alternatives: Support More Snowcoaches	22	Less than 1%
AL5025	Alternatives: Support Less Snowcoaches	23	Less than 1%
AL5030	Alternatives: Support Snowcoach Only	7,332*	52.63%
AL5040	Alternatives: Support No Snowmobile Access	237	1.70%
AL5050	Alternatives: Support No Snowcoach Access	10	Less than 1%
AL5060	Alternatives: Support Unlimited Snowmobile Access	8	Less than 1%
AL5065	Alternatives: Support more access (general)	311	2.23%
AL5068	Alternatives: Support less access (general)	39	Less than 1%
AL5069	Alternatives: Support no access (general)	49	Less than 1%
AL5070	Alternatives: Non-guided OSV Use	122	Less than 1%

Code	Description	# of Comments	% of Comments
AL5075	Alternatives: Non-commercially guided OSV Use	455	3.27%
AL5080	Alternatives: Adjustable OSV Caps	477	3.42%
AL5090	Alternatives: Plow Roads	424	3.04%
AL5095	Alternatives: Transition Period	423	3.04%
AL5098	Alternatives: Gate Allocations	404	2.90%
AL6000	Alternatives: Support Snowmobiles Using Sylvan Pass and East Entrance	23	Less than 1%
AL6010	Alternatives: Oppose Snowmobiles Using Sylvan Pass and East Entrance	24	Less than 1%
AL6020	Alternatives: Best Available Technology (BAT)	106	Less than 1%
AL6030	Alternatives: Specific suggestions for a new OSV limit/level	106	Less than 1%
AL6040	Alternatives: Separate OSV use by days	1	Less than 1%
AL6050	Alternatives: Timed entry	3	Less than 1%
AL6060	Alternatives: Other suggested alternatives/alternative elements	279	2.00%
AL6070	Alternatives: Summer use	108	Less than 1%
AQ1000	Air Quality: Guiding Policies, Regs, Laws	0	Less than 1%
AQ2000	Air Quality: Methodology And Assumptions	38	Less than 1%
CC1000	Consultation and Coordination: General Comments	16	Less than 1%
GA1000	Impact Analysis: Impact Analyses	261	1.87%
GA3000	Impact Analysis: General Methodology For Establishing Impacts/Effects	2	Less than 1%
GA4000	Impact Analysis: Impairment	4	Less than 1%
GA5000	Impact Analysis: Unacceptable Impacts	2	Less than 1%
HS2000	Health and Safety: Methodology and Assumptions	1	Less than 1%
HS4000	Health and Safety: Impact of Proposal and Alternatives	5	Less than 1%
MT1000	Miscellaneous Topics: General Comments	54	Less than 1%
OI3000	Other Issues: Comment Period	1	Less than 1%
ON1000	Other NEPA Issues: General Comments	2	Less than 1%
PN2000	Purpose And Need: Park Purpose And Significance	75	Less than 1%
PN3000	Purpose And Need: Scope Of The Analysis	8	Less than 1%
PN4000	Purpose And Need: Park Legislation/Authority	10	Less than 1%
PN5000	Purpose And Need: Regulatory Framework	513	3.68%
PN7050	Purpose and Need: Comments on the Draft Purpose Statement	262	1.88%



Code	Description	# of Comments	% of Comments
PN7075	Purpose and Need: Comments on the Draft Need Statement	248	1.78%
PN8000	Purpose And Need: Objectives In Taking Action	545	3.91%
PN9000	Purpose And Need: Issues And Impact Topics Selected For Analyses	26	Less than 1%
PO2000	Park Operations: Methodology And Assumptions	15	Less than 1%
PO4000	Park Operations: Impact Of Proposal And Alternatives	3	Less than 1%
SE2000	Socioeconomics: Methodology And Assumptions	20	Less than 1%
SE3000	Socioeconomics: Study Area	1	Less than 1%
SE4000	Socioeconomics: Impact Of Proposal And Alternatives	10	Less than 1%
SS2000	Soundscapes: Methodology And Assumptions	20	Less than 1%
SS4000	Soundscapes: Impact of Proposal And Alternatives	4	Less than 1%
VA1000	Visitor Use and Experience: Guiding Policies, Regs And Laws	3	Less than 1%
VA2000	Visitor Use and Experience: Methodology And Assumptions	34	Less than 1%
VA4000	Visitor Use and Experience: Impact of Proposal And Alternatives	11	Less than 1%
VQ1000	Visual Quality: Guiding Policies, Regs And Laws	1	Less than 1%
WH1000	Wildlife And Wildlife Habitat: Guiding Policies, Regs And Laws	3	Less than 1%
WH2000	Wildlife And Wildlife Habitat: Methodology And Assumptions	21	Less than 1%
WH4000	Wildlife And Wildlife Habitat: Impact Of Proposal And Alternatives	7	Less than 1%
XX1000	Duplicate Correspondence/Duplicate Comment	144	1.03%
<b>Total</b>		<b>13,932</b>	

*\*denotes code for which form letters were received, 17 in total*

**Table 2: Correspondence by Type**

Type	# of Correspondences
Other	14
Web Form	1,499
Park Form	24
Letter*	7,562
<b>Total</b>	<b>9,099</b>

*\*Letter category includes 17 form letters, totaling 7,642 correspondences*

**Table 3: Correspondence by Organization Type**

<b>Organization Type</b>	<b># of Correspondences</b>
Town or City Government	8
Business	15
County Government	2
University/Professional Society	1
State Government	9
Conservation/Preservation	58
Recreational Groups	20
Non-Governmental	2
Civic Groups	5
Unaffiliated Individual	8,979
<b>Total</b>	<b>9,099</b>

*Note\*: Table includes 17 form letters containing a total of 7,642 signatures*

**Table 4: Correspondence Distribution By State**

<b>State</b>	<b>Percentage</b>	<b># of Correspondences</b>
AK	Less than 1%	9
AL	Less than 1%	3
AR	Less than 1%	7
AZ	Less than 1%	12
CA	2%	174
CO	1%	71
CT	Less than 1%	8
DC	Less than 1%	9
DE	Less than 1%	1
FL	Less than 1%	22
GA	Less than 1%	5
HI	Less than 1%	1
IA	Less than 1%	7
ID	1%	133

State	Percentage	# of Correspondences
IL	1%	113
IN	Less than 1%	10
KS	Less than 1%	6
KY	Less than 1%	5
LA	Less than 1%	2
MA	Less than 1%	19
MD	Less than 1%	22
ME	Less than 1%	3
MI	1%	72
MN	1%	66
MO	Less than 1%	10
MS	Less than 1%	2
MT	4%	343
NC	Less than 1%	11
ND	Less than 1%	10
NE	Less than 1%	5
NH	Less than 1%	10
NJ	Less than 1%	12
NM	Less than 1%	10
NV	Less than 1%	24
NY	Less than 1%	31
OH	Less than 1%	13
OK	Less than 1%	6
OR	Less than 1%	34
PA	Less than 1%	18
RI	Less than 1%	2
SC	Less than 1%	4
SD	Less than 1%	23
TN	Less than 1%	9
TX	Less than 1%	28
Unknown	77%	7,005

State	Percentage	# of Correspondences
UT	1%	105
VA	Less than 1%	17
VT	Less than 1%	5
WA	4%	332
WI	Less than 1%	40
WV	Less than 1%	1
WY	2%	177
<b>Total</b>		<b>9,099</b>

*Note: "Unknown" category represents anonymous form letters.*

**Table 5: Correspondence Distribution By Country**

Country	Percent	# of Correspondences
United Kingdom	Less than 1%	1
United States of America	99%	9,070
Canada	Less than 1%	26
Sweden	Less than 1%	1
Switzerland	Less than 1%	1
<b>Total</b>		<b>9,099</b>

## PUBLIC COMMENT SUMMARY

**Yellowstone NP**  
**Comment Analysis--Proposed Interim Winter Use Rule 2009**

## Index of Concern Statements

Code, Corresponding Concern ID, and Corresponding Concern Statement		Page #
<b><i>AL4050 - Alternatives: No Action (No OSV Use)</i></b>		
Concern ID: 23588	One commenter stated that the no-action alternative should be the current winter use plan, and should not represent a "no access" scenario.	27
<b><i>AL5070 - Alternatives: Non-guided OSV Use</i></b>		
Concern ID: 23589	Several commenters stated general support for an alternative that includes non-guided OSV use, specifically snowmobile use, in the park. Reasons for wanting this element as part of the alternatives included the desire to have more freedom in their experience, the high cost of having to rent a snowmobile, and increasing accessibility of the park.	27
Concern ID: 23590	Commenters requesting a non-guided element in the Winter Use Plan/EIS suggested that such a use could be allowed if non-guided users were certified and had gone through training/an educational component. Specific suggestions for how this could work included a permit system or lottery system.	30
Concern ID: 23591	Commenters suggested that non-guided snowmobile use should be allowed, provided that the snowmobiles meet BAT requirements.	32
Concern ID: 23592	Commenters suggested that non-guided OSV use would not impact park resources if there was increased law enforcement.	32
Concern ID: 23593	One commenter stated that the option of non-guided use should not be included in the plan/EIS as it would likely be litigated.	33
Concern ID: 23594	Commenters suggested that non-guided OSV use, specifically snowmobile use, could occur in the park on certain road, during certain times, or by providing the concessioners a certain number of un-guided machines in their daily limit.	33
Concern ID: 23596	One commenter suggested that non-guided snowmobile use could be managed through the use of GPS units on the machines that would track anyone who went off of the road.	34
<b><i>AL5075 - Alternatives: Non-commercially guided OSV Use</i></b>		
Concern ID: 23597	Several commenters stated support for an alternative element that would allow individuals to become a non-commercial guide after some level of training has been completed. Some specific suggestions for training were suggested including using the on line "Safe Rider Awareness Program" and involvement in the park and snowmobile community before becoming a non-commercial guide.	35

Code, Corresponding Concern ID, and Corresponding Concern Statement		Page #
Concern ID: 23598	<p>Commenters suggested that the park include an alternative that looks at a "Certified Leader" pilot project. Commenters stated that this concept was considered in past planning processes and should be considered in this process. Specific suggestions included:</p> <ul style="list-style-type: none"> <li>- education requirements for the guide</li> <li>- a specific maximum group size of 6 (including the leader) and a minimum group size of four</li> <li>- management of such a program working with commercial guided snowmobile operations to track the numbers of non-commercially guided snowmobiles into the park</li> <li>- an initial limit of 18-24 snowmobiles per day with a Certified Leader, that could increase based on adaptive management</li> </ul> <p>It was also suggested that if this concept is adopted, Certified Group Leaders should account for 25% of the daily snowmobile limit in the park.</p>	36
Concern ID: 23599	<p>Commenters provided suggestions for possible guides that were non-commercial. Specific suggestions included using park rangers as guides, and having local snowmobile club members trained as guides.</p>	40
Concern ID: 23600	<p>Commenters provided specific suggestions for the level of non-commercially guided OSV use that should occur in the park including:</p> <ul style="list-style-type: none"> <li>-720 snowmobiles a day, with 25% non-commercially guided</li> <li>-group size limit of 6 for non-commercially guided use</li> <li>- non-commercially guided use should be no less than 20% of overall daily limits</li> </ul>	41
<b><i>AL5080 - Alternatives: Adjustable OSV Caps</i></b>		
Concern ID: 23601	<p>Commenters suggested that the cap for OSVs be seasonal instead of daily. Some commenters further suggested a seasonal cap, with an additional daily cap not to exceed.</p>	41
Concern ID: 23602	<p>Commenters suggested that flexible OSV caps be implemented around peak use times. These suggestions included allowing more OSV during busy holiday periods (Christmas/New Years week, Martin Luther King Day, Presidents Day) to accommodate an increased demand during those periods. One specific suggestion was to allow up to 20% more OSV use on peak days, with no more than 20% of the days in the season identified as peak days.</p>	42
Concern ID: 23606	<p>Commenters suggested that an alternative model a variation of flexible daily entry based on a visitation curve, rather than assumption of 100% use. It was suggested that this type of analysis would result in a higher, and more accurate, OSV cap being set.</p>	45
Concern ID: 23607	<p>One commenter suggested that OSV caps be implemented on a weekly basis.</p>	46
Concern ID: 23608	<p>Some commenters felt that if flexible OSV use limits were implemented, that people may take advantage of this and only discuss/photograph the highest use days, in an effort to mischaracterize OSV use and in the future, lower OSV use levels.</p>	47

Code, Corresponding Concern ID, and Corresponding Concern Statement		Page #
Concern ID: 23609	Commenters provided general support for some sort of system that implements flexible caps on OSV use.	48
Concern ID: 23610	Commenters suggested having a snowmobile limit of 500 a day, and then a flexibly system where operators could exceed that number by 33% for 20 days, decrease use by 33% for 20 days, and maintain use at 500 for the rest of the season. This same concept was also suggested, with a base number of 490 snowmobiles a day. Some commenters felt that this concept was good, but 33% was too high and that the increased use days should be around 10% to 20%	48
Concern ID: 23613	One commenter suggested that OSV caps be flexible and based on air quality. Specifically, OSV use should be lower on inversion days, and higher on non-inversion days.	50
<b><i>AL5090 - Alternatives: Plow Roads</i></b>		
Concern ID: 23614	Several commenters stated general support for an alternative that considers plowing all or some of the roads in the park during the winter. Commenters stated that this would provide greater access and a lower cost option to be able to experience the park in the winter. These commenters did not suggested specific areas that should be plowed, or other specific elements related to this alternative.	50
Concern ID: 23615	Commenters stated that while they supported plowing the roads in Yellowstone during the winter, they did not think Dunraven Pass and Sylvan Pass should be plowed, due to safety reasons.	53
Concern ID: 23617	Several commenters suggested that specifically, the west side of the park should be plowed. Many of these stated that West Yellowstone to Old Faithful or Mammoth to Old Faithful should be the subject of plowing efforts.	53
Concern ID: 23619	Commenters stated that plowing the roads would be a less expensive option for the NPS than the current system of road grooming for OSV use. They further stated that the NPS plowing operations in the Lamar Valley to Cooke City show this is a viable option.	60
Concern ID: 23620	Commenters stated opposition to the concept of plowing the roads in Yellowstone in the winter. Reasons for concern included impacting the visitor experience, impacts to wildlife, and allowing the park the time to "recover" in the winter.	63
Concern ID: 23621	One commenter requested that the plan/EIS evaluate the cost of visitation on OSV vs. plowed roads.	65
Concern ID: 23622	One commenter suggested that the NPS has the opportunity to form a supportive coalition for plowing the roads, which would help the success of this alternative.	65
Concern ID: 23623	Commenters suggested specific requirements they felt would be necessary if wheeled vehicles were permitted in the park. These suggestions include: <ul style="list-style-type: none"> <li>- Mandatory chains</li> <li>- speed limit reductions</li> <li>- placing a limit on the number of private cars permitting in the park each day</li> <li>- implement road closures when conditions are too hazardous</li> </ul>	65

Code, Corresponding Concern ID, and Corresponding Concern Statement		Page #
	<ul style="list-style-type: none"> <li>- a requirement for four wheel drive vehicles</li> <li>- implementing night time closures</li> </ul>	
Concern ID: 23624	<p>Commenters noted concern about the impacts of plowing on the park's wildlife. Specific areas of concern included added stress during the winter from more vehicles and changing the movements of the animals either from easier access on roads or from large snow berms created from plowing.</p> <p>Other commenters felt this was not a concern as the wildlife are not impacted during the summer when there are vehicles in the park and that wildlife in the Lamar Valley do not seem impacted by winter vehicle use.</p>	67
Concern ID: 23625	<p>Commenters suggested certain amenities that they would like to see under an alternative with road plowing such as: addition parking lots, extended hours for concessionaires to service increased visitation, and keeping the park open in November.</p>	69
Concern ID: 23626	<p>Commenters asked that a range of possible scenarios for an alternative that includes road plowing be considered, and provided suggestions for that range.</p>	70
Concern ID: 23629	<p>Commenters suggested that if wheeled vehicles are allowed in Yellowstone in the winter, they should be transit/bus vehicles only and that private vehicle use should not be permitted.</p>	70
Concern ID: 23630	<p>While in support of road plowing in certain areas of the park, commenters suggested areas they felt should not be plowed including:</p> <ul style="list-style-type: none"> <li>- east side of the park</li> </ul>	71
Concern ID: 23632	<p>Commenters requested specific portions of road to be plowed under the Winter Use Plan including:</p> <ul style="list-style-type: none"> <li>- the 10 mile section of Highway 212 from Cooke City to Pilot Creek</li> <li>-Colter Pass</li> <li>-the 11 miles between Cooke City and 296</li> </ul>	72
Concern ID: 23633	<p>Commenters raised questions related to plowing and park operations and visitor use they felt should be addressed in the plan/EIS. These questions included: where do funds for plowing come from; how can the park keep up with snowfall during heavy snow years; how would visitation be impacted if roads could not be opened on time; how will the park address damage to the road base; the impact of traffic jams in the winter; will there be adequate services for winter visitors; what would operating hours of the park be, as well as question related to what the visitor can see/do in the winter in a vehicle and how the park can manage this use in the winter.</p>	73
Concern ID: 23635	<p>Commenters suggested various alternative scenarios that provided a mix of OSV and wheeled vehicle use in the park during the winter.</p>	76
Concern ID: 23637	<p>Commenters raised questions related to health and safety they felt should be considered in the plan/EIS. These include: are visitors/employees safer in cars with airbags than on OSV; would there be numerous road closures for hazardous conditions; and how would visitors in adverse conditions be accommodated.</p>	78



<b>Code, Corresponding Concern ID, and Corresponding Concern Statement</b>		<b>Page #</b>
Concern ID: 23638	One commenter requested clarification on if private vehicles would be permitted under an alternative with road plowing, or if there would be a requirement for commercial vehicles only.	79
Concern ID: 23639	Commenters requested that the plan/EIS include an alternative that combines plowing the west side of the park with a Certified Leader/EPA compliant snowmobile component.	79
Concern ID: 23641	Commenters suggested that the NPS include an "all season alternative," which includes a combination of plowed roads and bus access.	80
Concern ID: 23642	One commenter requested that if a plowed road option is include, that it permit private cars and not require a concessioner for access.	81
<b><i>AL5095 - Alternatives: Transition Period</i></b>		
Concern ID: 23643	Commenters requested that there be a one-year transition period before any new regulations take effect to allow businesses and visitors to plan for any changes in management.	82
<b><i>AL5098 - Alternatives: Gate Allocations</i></b>		
Concern ID: 23644	Commenters requested flexibility in how OSV numbers are allocated between gates. Some suggested that if one gate knew in advance they would not use their allocation, those numbers could be transferred to another gate.	84
Concern ID: 23645	One commenter suggested a change in the way the allocation for the west gate is calculated.	84
<b><i>AL6000 - Alternatives: Support Snowmobiles Using Sylvan Pass and East Entrance</i></b>		
Concern ID: 23646	Commenters requested that Sylvan Pass and the East Gate remain open, with some suggesting the time it is open in the winter be extended.	85
Concern ID: 23647	One commenter requested that the plan/EIS evaluate the cost associated with managing Sylvan Pass in the winter, as well as safety issues.	87
Concern ID: 23648	Commenters suggested that the concerns to close Sylvan Pass due to avalanche concerns were not founded.	87
<b><i>AL6010 - Alternatives: Oppose Snowmobiles Using Sylvan Pass and East Entrance</i></b>		
Concern ID: 23649	Commenters requested that the plan/EIS include an alternative that closes Sylvan Pass and the East Gate due to health and safety issues, as well as environmental impacts.	88
<b><i>AL6020 - Alternatives: Best Available Technology (BAT)</i></b>		
Concern ID: 23650	Commenters provided general support for BAT requirements for OSV operating in the park.	89

<b>Code, Corresponding Concern ID, and Corresponding Concern Statement</b>		<b>Page #</b>
Concern ID: 23651	Commenters requested that BAT requirements for snowcoaches be included in the Winter Use Plan. Specific suggestions included noise, weight, and size limits for snowcoaches.	90
Concern ID: 23652	One commenter suggested that zero emissions snowmobiles be permitted in the park.	91
Concern ID: 23653	Commenters suggested that any EPA Compliant snowmobile be considered BAT.	91
Concern ID: 23654	Commenters suggested that what constitutes BAT be revisited. Suggestions included allowing any 4-stroke snowmobile to qualify as BAT, as well as allowing all snowmobile of a certain age (models 5 years or newer for example) to qualify as BAT.	94
Concern ID: 23655	Commenters requested that an exemption from BAT and guiding requirements on Cave Falls Road be carried throughout the alternatives. An exemption from these requirements specifically on Grassy Lake Road to Flagg Ranch was also requested	96
Concern ID: 23656	Commenters suggested that BAT should not be included in the Winter Use Plan, with some feeling that it is too expensive of a requirement.	97
Concern ID: 23657	Commenters requested that EPA compliant snowmobiles be allowed on the Continental Divide Trail and on Jackson Lake.	98
Concern ID: 23658	Commenters stated that the soundscape needed to be improved to comply with the 1974 plan, which would include noise from individual snowmobiles and snowcoaches.	99
Concern ID: 23659	One commenter requested that all snowmobiles be 4-stroke, with no exceptions.	99
<b><i>AL6030 - Alternatives: Specific suggestions for a new OSV limit/level</i></b>		
Concern ID: 23660	<p>Commenters suggested that the OSV cap be revised to allow more than the current level of use. Specific suggestions included:</p> <ul style="list-style-type: none"> <li>- 1,000 per day</li> <li>- 425 snowmobiles and 50 coaches</li> <li>- 520 snowmobiles</li> <li>- 700 snowmobiles</li> <li>- 540 snowmobiles, 78 snowcoaches</li> <li>- 720 to 540 snowmobiles</li> <li>- 720 snowmobiles (with 25% non-commercially guided)</li> <li>- 490 snowmobiles</li> <li>- 500 snowmobiles</li> <li>- Average number of machines in 2002 at each entrance, divided by 2</li> <li>- 350 to 450 snowmobiles</li> <li>- 750 snowmobiles</li> <li>- 750 to 950 snowmobiles</li> </ul>	99

Code, Corresponding Concern ID, and Corresponding Concern Statement		Page #
	- 1,400 (25% private) - 800 to 1,000 snowmobiles - 1,500 snowmobiles - 600 snowmobiles	
Concern ID: 23662	Commenters suggested specific levels of snowcoach access they would like to see. Suggestions included: - 25 at the West entrance, 25 at the North entrance, 15 at the South entrance, and 10 at the East entrance - 12 snowcoaches per day	103
Concern ID: 23664	One commenter suggested a range of alternatives that should be evaluated that would look at a range of use numbers. This range included current use, current peak use, more use than current and less use than current.	104
Concern ID: 23665	Commenters offered suggestion for use levels at specific entrance points. Suggestions included: -30 daily entries at the East entrance -55% at the West entrance -50 daily entries at the East entrance	105
Concern ID: 23667	Commenters requested that the Winter Use Plan consider numbers less than currently allowed, specifically looking at less than 200 OSV or less per day. Another suggested limiting use to 10 tours per day in the park, with 5 snowmobiles per tour.	105
<b><i>AL6040 - Alternatives: Separate OSV use by days</i></b>		
Concern ID: 23670	One commenter suggested having specific snowmobile-free days.	106
<b><i>AL6050 - Alternatives: Timed entry</i></b>		
Concern ID: 23671	Commenters stated support for establishing timed entry into the park for OSV in order to address concerns related to the soundscapes.	106
<b><i>AL6060 - Alternatives: Other suggested alternatives/alternative elements</i></b>		
Concern ID: 23672	Commenters requested that the park add additional tours/programs related to OSV use include snowmobile tours that originate at Old Faithful, marketing the park as an educational destination, showing films related to the parks wildlife, hold "winter safaris", and having workshop retreats for artists.	107
Concern ID: 23674	Commenters requested that oversnow bikes be allowed at part of the Winter Use Plan.	109
Concern ID: 23675	One commenter requested that a "no shoot zone" be established around the park boundary.	110
Concern ID: 23676	Commenters requested an alternative that is geared more toward enhancing the non-motorized use experience. Suggestions included groomed trails, more signage at trailheads, segregated lanes for skiers, the addition of warming huts, and allowing non-motorized users free access.	110
Concern ID: 23679	Commenters suggested that the park implement an option for alternative transportation in the winter in the form of a shuttle, bus, trolley, or monorail.	112

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Concern ID: 23681	Commenters requested that additional regulations for snowcoaches be put in place. These include a drag device for large (20+ passenger) snowcoaches, not allowing large snowcoaches, restrict snowmobiles and snowcoaches to the same number of passengers, and making sure the NPS has ridden in all snowcoaches.	116
Concern ID: 23682	Commenters requested that guides for snowmobile use count as administrative use, rather than part of the daily limit.	117
Concern ID: 23683	Commenters suggested changing the dates of winter use in the park. These suggestions included having the opening/closing dates not tied to a specific date, but rather a set day of the week (i.e. the third Monday in December), having the season from December 20 to March 10, extend the winter season a week, and only allow one week for plowing between winter seasons.	117
Concern ID: 23684	Commenters offered suggestions for changing how fees are charged in the winter at Yellowstone. Suggestions included: a grooming fee for everyone in place of an entrance fee, a fee that covers OSV management costs, charging a garbage disposal fee, concerns about paying a yearly fee and only being able to use the park half of the year, increasing fees, and having "fee free" times.	118
Concern ID: 23685	Commenters requested that the Winter Use Plan include adaptive management. Specific suggestions were to base use on historic numbers, with an allowance for growth and to only limit OSV numbers if impacts are shown.	120
Concern ID: 23686	Some commenters suggested closing Yellowstone in the winter. Specific suggestions were made as to specific areas/times that the park could close that included closing the Northern Range during harsh winters and closing the park a few days a week for recovery. Some commenters stated that if the park is closed to OSV use, it should be closed to all other non-motorized uses as well.	121
Concern ID: 23687	Commenters noted the need for access for those with disabilities, with one commenter suggesting this could be accomplished with dog sleds.	122
Concern ID: 23689	One commenter requested that wood fires be allowed in the winter.	122
Concern ID: 23690	One commenter suggested the use of horse and dog-drawn sleds in the park.	123
Concern ID: 23691	Commenters suggested that zoning of uses occur, with areas for snowmobile use for those who want to engage in that activity. Areas set aside for protection of wildlife were also suggested. Others suggested segmenting areas for OSV use, wheeled vehicle use, and no motorized vehicle use.	123
Concern ID: 23692	Commenters made suggestions for alternative elements that would reduce noise in the park. These suggestions included: requiring skiers to wear helmets with intercoms for talking, only licensing a few tour companies with low quotas, require multiple passenger snowmobiles, and establishing noise restrictions for visitors.	124
Concern ID: 23697	Commenters stated that increased law enforcement/rangers should be included in the Winter Use Plan. Increased fines for violators and well as removing violators from the park were suggested.	125
Concern ID: 23698	One commenter suggested that Wyoming, Idaho, and Montana residents be provided easier access.	126

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Concern ID: 23699	Commenters suggested limitations on when and where OSV should be used. These suggestions including no vehicles on the roads after sunset, allowing more visitation at Firehole Canyon Drive, and closing Fountain Flats/Freight Road to oversnow travel.	126
Concern ID: 23700	Commenters suggested new options for winter lodging in the park including cabins, limiting the amount of lodging provided in the park during the winter, more camping areas, and opening the Obsidian Dormitory.	127
Concern ID: 23705	Commenters suggested that OSV use occur with a guide and that training be provided to OSV users.	128
Concern ID: 23708	One commenter requested that more grooming occur and that more snow be stored to be used later in the season.	129
Concern ID: 23709	Commenters suggested that the speed limit be changed to 45 mph for OSV use.	129
Concern ID: 23710	Commenters suggested that OSV use be limited to administrative use only.	129
Concern ID: 23713	One commenter suggested that the park post the road conditions of Mammoth Road on a website.	130
Concern ID: 23715	Commenters suggested vehicle requirements for OSV including emissions tests and banning high powered machines.	130
Concern ID: 23718	Commenters suggested ways in which advances in technology could be incorporated into the Winter Use Plan. Suggestions included use of web cams to see more areas of the park, creating a plan that allows technology to be implemented in a timelier manner, and implementing technologies from the Clean Snow Competition.	131
Concern ID: 23720	One commenter requested that the West Yellowstone airport be kept open during the winter.	131
Concern ID: 23721	Commenters requested an alternative that includes more machine-groomed non-motorized trails around Old Faithful, with specific suggestions of what these trails would look like.	131
Concern ID: 23722	One commenter requested that concessionaire permits be provided for a longer period, at least six years.	132
Concern ID: 23723	One commenter suggested that Yellowstone enroll in the Wyoming State Trails program for snowmobiles.	133
Concern ID: 23724	Commenters requested that the Continental Divide Snowmobile trail remain open.	133
Concern ID: 23725	Commenters requested increased coordination with the community and other interest groups in the development of alternatives, with one commenter suggesting groups to be consulted with.	134
Concern ID: 23727	One commenter suggested the park could remain open in the winter but post times when no services are available.	135
Concern ID: 23728	One commenter suggested limiting backcountry use in the winter.	135
<b><i>AQ2000 - Air Quality: Methodology And Assumptions</i></b>		
Concern ID: 23729	Commenters requested that the plan/EIS analysis include the impact of snowmobiles on air quality. They requested snowmobiles vs. no snowmobiles be examined, as well as snowmobiles vs. snowcoaches and a cumulative impacts	136

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	analysis.	
Concern ID: 23730	Commenters requested that the EIS analysis of air quality compare winter use and summer use.	137
Concern ID: 23733	Commenters noted improvements in snowmobile technology in recent years. They suggested that the NPS segregate this new technology in its analysis and offered sources of information they felt the NPS should consult in its analysis.	138
Concern ID: 23736	Commenters suggested that the air quality analysis use information provided by Dr. Bishop in his 2006 publication, "In Use Emissions."	140
Concern ID: 23739	Commenters suggested modeling that should be completed for the air quality analysis in the plan/EIS. Suggestions included developing an Air Quality Monitoring Protocol that is vetted with an air quality working group, use of appropriate BAT emission factors for snowcoaches, and include a detailed discussion of historic air quality monitoring conducted in the park.	141
Concern ID: 23742	Commenters requested that the plan/EIS analysis include a more extensive assessment of greenhouse gas emissions and climate change than past planning documents.	142
Concern ID: 23745	Commenters question past data related to air quality analysis. Specific concerns included skewed data from misplaced air monitors and the modeling assumption of 100% use.	144
Concern ID: 23746	One commenter suggested the formation of an air quality working group to get larger stakeholder buy-in for the air quality analysis.	144
<b><i>CC1000 - Consultation and Coordination: General Comments</i></b>		
Concern ID: 23751	Commenters requested extensive public involvement and agency coordination in the Winter Use Planning process, with a specific suggestion to work with the Society of Automotive Engineers Clean Snowmobile Challenge.	145
Concern ID: 23754	Commenters suggested specific publications that should be consulted during the development that relate to coalition building and gaining public support.	146
<b><i>GA1000 - Impact Analysis: Impact Analyses</i></b>		
Concern ID: 23767	Commenters requested that the impact analysis use best available science, as well as assess making access available and affordable to visitors.	147
Concern ID: 23768	Commenters requested that the plan/EIS analysis look at context and intensity.	148
Concern ID: 23769	One commenter requested that the impact analysis develop a formula that considers the total loaded weight of a snowcoach compared to the surface area of the vehicle tracks in order to evaluate the impact from snowcoaches. Other commenters asked that the park look at the impact of snowmobiles vs. snowcoaches.	148
Concern ID: 23770	One commenter requested that the analysis of park resources consider the park as a whole, not just where OSV use occurs.	149

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Concern ID: 23773	Commenters asked that the impact analysis for this plan/EIS not be limited to those issues litigated or to information in previous planning documents. In addition, they requested that the baseline be no OSV use.	149
Concern ID: 23775	Commenters requested that the impact analysis of each alternative consider what uses are occurring and can or cannot be accommodated on adjacent federal lands. One commenter requested that this be reflected in the cumulative impacts analysis.	150
Concern ID: 23779	One commenter requested that the plan/EIS consider the low percentage of use that winter use represents in the impact analysis.	151
Concern ID: 23782	One commenter requested that where the analysis identifies impacts, appropriate mitigation measures be identified.	151
Concern ID: 23783	One commenter requested that the comments of people from the local area receive more weight those from other areas.	151
<b><i>GA3000 - Impact Analysis: General Methodology For Establishing Impacts/Effects</i></b>		
Concern ID: 23787	One commenter requested a range of areas that should be part of the impact analysis methodology for the plan/EIS such as how snowmobile impacts air, sound, and visitor use.	152
<b><i>GA4000 - Impact Analysis: Impairment</i></b>		
Concern ID: 23790	Commenters requested a plan that keeps the park unimpaired for future generations, with one commenter stating that they believe OSV use is an impairment.	152
Concern ID: 23791	Commenters stated they did not feel snowmobile use was an impairment of park resources.	153
<b><i>GA5000 - Impact Analysis: Unacceptable Impacts</i></b>		
Concern ID: 23796	One commenter stated that the NPS use of the unacceptable impact standard is a misstatement of the law.	153
Concern ID: 23797	One commenter stated that they believe the available research shows that snowmobiles cause an unacceptable impact.	154
<b><i>HS2000 - Health and Safety: Methodology and Assumptions</i></b>		
Concern ID: 23798	One commenter stated that a risk vs. reward analysis was not appropriate for the decision to keep (or not keep) Sylvan Pass open.	154
<b><i>HS4000 - Health and Safety: Impact of Proposal and Alternatives</i></b>		
Concern ID: 23799	Commenters suggested there would be beneficial impacts of plowing the roads to health and safety, with faster emergency response and lack of people driving on snow covered roads.	154
Concern ID: 23800	One commenter noted that they believed plowed roads would create a safety risk from and increased interaction between wildlife and vehicles.	155
<b><i>OI3000 - Other Issues: Comment Period</i></b>		

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Concern ID: 23801	One commenter requested that every citizen's comment receive equal weight in the plan/EIS.	155
<b><i>ON1000 - Other NEPA Issues: General Comments</i></b>		
Concern ID: 23802	One commenter stated that as part of the NEPA process, the NPS needs to explain why winter use is being limited, while summer use is not.	155
<b><i>PN3000 - Purpose And Need: Scope Of The Analysis</i></b>		
Concern ID: 23803	Commenters suggested that the scope of the analysis should include a comparison/analysis of summer use vs. winter use.	156
Concern ID: 23805	Commenters stated that the scope of the Winter Use Plan should be expanded to include a greater emphasis on non-motorized winter use (see also "Other Suggested Alternative Elements")	156
Concern ID: 23806	One commenter requested that the scope of the plan include winter use in Grant Teton National Park.	158
<b><i>PN4000 - Purpose And Need: Park Legislation/Authority</i></b>		
Concern ID: 23836	Commenters noted pieces of Yellowstone's legislation and authority they felt represented the need to provide for recreational uses in the park.	158
Concern ID: 23837	Commenters suggested that Yellowstone's legislation and authority does not provide for snowmobile use.	159
<b><i>PN5000 - Purpose And Need: Regulatory Framework</i></b>		
Concern ID: 23843	Commenters stated that the mandate of the park service to "promote" and "provide for the use and enjoyment" of the park resources needs to be balanced with leaving these resources unimpaired when making management decisions.	160
Concern ID: 23844	Commenters stated that the regulatory framework in which the park was established provides for access to the park, including snowmobile use.	160
Concern ID: 23845	Commenters stated that various NPS policies and regulations mandate that snowmobiles not be allowed in the park. Some of the acts cited include the Organic Act, as well as NPS management policies.	161
<b><i>PN7050 - Purpose and Need: Comments on the Draft Purpose Statement</i></b>		
Concern ID: 23846	Commenters stated the purpose statement should be re-worded to state "how" OSV use would occur rather than "whether" OSV use would occur.	163
Concern ID: 23847	Commenters suggested re-wording the purpose statement to include preservation of specific park resources.	164
Concern ID: 23848	Commenters stated that the purpose statement should be within the legal bounds of the park.	165
Concern ID: 23849	One commenter suggested that the purpose statement broaden the use of the word "public" and maybe add a component dealing with "long-range."	166
Concern ID: 23850	One commenter suggested the purpose statement answer the question, "What do you (the public) want Yellowstone to look	166



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	like and be like in 50 years?"\	
<b><i>PN7075 - Purpose and Need: Comments on the Draft Need Statement</i></b>		
Concern ID: 23851	Commenters stated that the need statement should be revised to remove any limiting statements.	166
<b><i>PN8000 - Purpose And Need: Objectives In Taking Action</i></b>		
Concern ID: 23852	Health and Safety: Commenters questioned the use of the word "accident" in this objective statement, feeling that these cannot be "managed." Other commenters felt this objective should include the health of the communities around the park.	167
Concern ID: 23853	Coordination and Cooperation: Commenters suggesting adding a statement to this objective that would provide for a transition period once any plan is implemented. Another commenter asked for clarification on who "park" partners included and their role in this planning process.	167
Concern ID: 23854	Park Management and Operations: Commenters asked this statement to be modified to include "sustainability of road grooming."	168
Concern ID: 23855	Commenters stated that the objective to "Promote advances of OSV technology" may not be achievable due to the level of OSV use in the park and asked that BAT requirements be revisited.	169
Concern ID: 23856	Commenters felt that the objective to "Promote advances of OSV technology" was too narrow. They felt it was pre-decisional, indicating that OSV use would occur, and excluding wheeled vehicles.	169
Concern ID: 23857	Commenters requested that the objectives reflect the socioeconomic aspects of OSV management.	170
Concern ID: 23858	Visitor Use: Commenters suggested adding providing "affordable access to the public" to this objective.	171
	Commenters also raised concern about the component to "provide opportunities that are universally accessible" stating that this could be interpreted too broadly.	
Concern ID: 23859	Resources/Air Quality: Commenters stated that this objective should be clarified as it is un clear to see how air quality and aquatic systems relate.	172
Concern ID: 23860	Resources/Air Quality: Commenters asked that this statement be revised to seek the best air quality and minimize impacts to the greatest extent, rather than just meeting what is required under regulations.	173
Concern ID: 23861	Resources/Wilderness: Commenters stated that this objective should be removed, as it is not appropriate to expect wilderness character and values in developed areas.	173
Concern ID: 23862	Resources/Sound: Commenters suggested that the language of this objective be modified to include language on the "percent time audibility" or to provide information on loudness, frequency, and duration.	174
Concern ID: 23863	Resources/Wildlife: Commenters suggested this objective be modified to focus more on the geographic area where OSV use would occur, along travel corridors.	174

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Concern ID: 23864	Additional Objectives: Commenters suggested adding objectives, under resources, for solitude and light - as well as suggested wording for these objective statements.	175
Concern ID: 23865	Additional objectives: Commenters suggested adding employee safety and cost effectiveness to objectives. Another commenter suggested adding aquatic resources as an objective.	175
<b><i>PN9000 - Purpose And Need: Issues And Impact Topics Selected For Analyses</i></b>		
Concern ID: 23866	Commenters stated factors related to transportation that should be addressed in the plan/EIS including clarifying what roads are within the park, costs of various transportation management alternatives, and clarification on what is considered and OSV.	175
Concern ID: 23867	Commenters requested that the issues be looked at on an ecosystem level.	177
Concern ID: 23869	Commenters provided a list of resources they feel make Yellowstone unique and that should be addressed including: air quality, geothermal features, wildlife, geologic features, "wildness", water quality, quiet, and the range of visitor experience.	177
Concern ID: 23870	Commenters requested that new and emerging technologies be considered in the range of issues in the plan/EIS.	178
Concern ID: 23871	Commenters requested that the historic snowpack levels, and potential impacts of climate change on these levels, be addressed in the plan/EIS. Another commenter asked that the long-term costs of energy needs be addressed.	178
Concern ID: 23872	Commenters stated that wildness should not be an issue addressed in the plan/EIS as this is not a resource along road corridors and developed areas.	180
Concern ID: 23873	Commenters requested that the issue of Emergency Medical Services (EMS) be addressed in the plan/EIS.	180
<b><i>PO2000 - Park Operations: Methodology And Assumptions</i></b>		
Concern ID: 23906	Commenters requested that the plan/EIS analyze the manpower and human resourced that would be dedicated to carrying out each alternative (personnel, equipment, facilities, concessionaire services, and IT).	181
Concern ID: 23907	Commenters asked that the plan/EIS analyze the costs associated with an alternative that plows roads, and requested a cost analysis between plowing and grooming of the roads.	181
Concern ID: 23908	One commenter noted the high costs of transporting goods and services oversnow into the park.	182
Concern ID: 23910	One commenter requested that the plan/EIS address NPSs responsibility to groom trails for non-motorized uses.	182
<b><i>SE2000 - Socioeconomics: Methodology And Assumptions</i></b>		
Concern ID: 23911	Commenters requested that the plan/EIS analysis consider the impacts of the economy of surrounding communities.	182

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Concern ID: 23912	Commenters stated that the NPS was not charged with ensuring the economy of the surrounding communities, and that they did not believe the adverse impacts of a reduction in OSV use would be large.	184
<b><i>SE3000 - Socioeconomics: Study Area</i></b>		
Concern ID: 23874	One commenter requested that Big Sky be included in the study area for the socioeconomic analysis.	186
<b><i>SE4000 - Socioeconomics: Impact Of Proposal And Alternatives</i></b>		
Concern ID: 23875	Commenters stated that if the park is closed to winter use, the local economy would be adversely impacted.	186
Concern ID: 23876	One commenter requested that the socioeconomic impact analysis not only look at loss of revenue from OSV use, but the potential economic values of not permitting OSV in the park.	187
<b><i>SS2000 - Soundscapes: Methodology And Assumptions</i></b>		
Concern ID: 23877	Commenters requested that the plan/EIS analysis include noise pollution, with some commenters noting the regulatory authority in which NPS must consider impacts to soundscapes.	188
Concern ID: 23878	Commenters stated concerns with noise generated from snowcoaches they felt should be addressed in the plan/EIS. This included conducting more monitoring of snowcoach noise, explaining why snowcoaches are preferred if they are louder than snowmobiles, as well as providing possible data the NPS could use to analyze the sound impacts from snowcoaches.	189
Concern ID: 23880	Commenters suggested noise modeling techniques and data that should be included in the plan/EIS. Suggestions included using impact definitions that do not have a park-wide metric, looking at both sound quality as well as sound pressure, consideration of previous planning efforts sound thresholds, and correlation of EPA standards and NPS monitoring protocols.	190
<b><i>SS4000 - Soundscapes: Impact of Proposal And Alternatives</i></b>		
Concern ID: 23881	Based on the analysis from past planning efforts, commenters stated that snowmobiles should be removed from the park to lessen the impact to the soundscape.	192
<b><i>VA1000 - Visitor Use and Experience: Guiding Policies, Regs And Laws</i></b>		
Concern ID: 23882	Commenters noted sections of the NPS 2006 Management Policies, Executive Orders, and the Organic Act that the NPS should consider during the analysis of impacts to visitor use and experience.	192
<b><i>VA2000 - Visitor Use and Experience: Methodology And Assumptions</i></b>		
Concern ID: 23883	Commenters requested that the analysis of visitor use and experience address recreational opportunities on nearby or adjacent federal lands.	194
Concern ID: 23884	Some commenters noted that they felt the cost for visiting Yellowstone in the winter was prohibitive, and would like to see that addressed in the plan/EIS analysis.	195
Concern ID: 23885	Commenters asked that the guided requirement be evaluated, with some noting they felt the requirement for a guide impacted the visitor experience by bunching large groups together that create more noise and by taking away visitor flexibility.	195

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	One commenter noted the potential benefits of a guide, and if more vehicles were allowed, would like to see an analysis of requiring professional drivers.	
Concern ID: 23887	Commenters requested that specific trend data/metrics be addressed in the plan/EIS including: - an analysis of the geographic origin of park visitors - an analysis of OSV numbers that includes guides in the count - trends data on snowmobile use by snowshoers/skiers - inclusion of trends that show snowcoach use increasing and snowmobile use decreasing - inclusion of monitoring reports that show how many visitors pass through certain park areas	196
Concern ID: 23888	Commenters provided suggestions for how visitor use should be modeled in the plan/EIS. Specifically, it was requested that a visitation curve be used, instead of assuming 100% use on every day of the winter use season.	198
Concern ID: 23889	One commenter requested that the NPS consider statistics showing that a snowcoach only option is not viable for park visitors, with others requesting that the visitor use and experience analysis include a wider range of options for visitors.	199
Concern ID: 23890	Commenters requested that the analysis of visitor use and experience take into consideration the uncertainty of past winter use management, and how that may have impacted past and future OSV use numbers.	200
Concern ID: 23891	Commenters requested that the plan/EIS consider a carrying capacity for winter use.	201
<b><i>VA4000 - Visitor Use and Experience: Impact of Proposal And Alternatives</i></b>		
Concern ID: 23892	Commenters noted that the plan/EIS should consider access for those visitors with disabilities, and the role OSV play in this access.	201
Concern ID: 23893	Commenters noted that they believe OSV use would impact the park's flora, fauna, water resources, and air quality and that reduction in OSV use would limit these impacts and increase the visitor experience.	202
Concern ID: 23895	Commenters noted that past planning efforts have resulted in an decrease of park visitation, with some feeling that no snowmobile use would cut off visitation from the park in the winter.	203
Concern ID: 23897	One commenter suggested that visitor use could be increased through programs that allot money to certain groups so they can visit the park.	203
<b><i>WH1000 - Wildlife And Wildlife Habitat: Guiding Policies, Regs And Laws</i></b>		
Concern ID: 23898	Commenters noted what they believed what NPS responsibility to protect wildlife under the Organic Act, Executive Orders, and NPS Management Policies.	203
<b><i>WH2000 - Wildlife And Wildlife Habitat: Methodology And Assumptions</i></b>		
Concern ID: 23899	Commenters stated that non-motorized uses could have a greater impact than snowmobiles, and felt this should be considered in the plan/EIS.	204
Concern ID: 23900	Commenters stated that the plan/EIS should consider and use data showing that OSV use does not disturb wildlife in the	205

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	park.	
Concern ID: 23902	Commenters requested that the plan/EIS evaluate the impacts of snowpacking/road grooming on the park's wildlife. It was stated that this was a deficiency of past planning efforts and data to be considered for this effort was suggested.	206
Concern ID: 23903	Commenters suggested specific areas they would like to see analyzed in the plan/EIS including: - no assumptions that habituation equals no disturbance - is there a tipping point for disturbance - how does vehicle use influence animal movement/avoidance	208
<b><i>WH4000 - Wildlife And Wildlife Habitat: Impact Of Proposal And Alternatives</i></b>		
Concern ID: 23901	The Wyoming Game and Fish Department noted that they did not feel there were terrestrial or aquatic concerns related to the Winter Use Plan.	209
Concern ID: 23905	Commenters noted that current winter use would impact wildlife less than unrestricted wheeled vehicle use.	209

**Yellowstone NP**  
**Winter Use Plan/Environmental Impact Statement**  
**Concern Response Report**

**AL4050 - Alternatives: No Action (No OSV Use)**

**Concern ID:** 23588

**CONCERN STATEMENT:** One commenter stated that the no-action alternative should be the current winter use plan, and should not represent a "no access" scenario.

**Representative Quote(s):** **Corr. ID:** 1584 **Organization:** *Not Specified*

**Comment ID:** 129623 **Organization Type:** Unaffiliated Individual

**Representative Quote:** 5. If the "no action" alternative is the base against which all other alternatives are measured, then the only "no action" measurement should not be "no access" (which is what would happen if a plan is not in place by December 2011). Consider the no action alternative to be the current winter plan.

Thank you again for this opportunity to participate.

**AL5070 - Alternatives: Non-guided OSV Use**

**Concern ID:** 23589

**CONCERN STATEMENT:** Several commenters stated general support for an alternative that includes non-guided OSV use, specifically snowmobile use, in the park. Reasons for wanting this element as part of the alternatives included the desire to have more freedom in their experience, the high cost of having to rent a snowmobile, and increasing accessibility of the park.

**Representative Quote(s):** **Corr. ID:** 223 **Organization:** *Not Specified*

**Comment ID:** 127662 **Organization Type:** Unaffiliated Individual

**Representative Quote:** With the new machines it is much better and quieter, however, I do not feel that allowing only guided snowmobile tours are the answer. People should be allowed in individually if their machines meet the criteria. This would allow the machines to not be so bunched up and in turn the noise and pollution would not be as great in any one spot.

**Corr. ID:** 237 **Organization:** *Not Specified*

**Comment ID:** 127333 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Eliminate the guide for snowmobiles, as it makes things excessively expensive and is not necessary for four strokes

**Corr. ID:** 278 **Organization:** *Not Specified*

**Comment ID:** 127355 **Organization Type:** Unaffiliated Individual

**Representative Quote:** The single most exciting and thrilling experience of my outdoor life took place in Yellowstone when I took my first snowmobile trip through the park. I came to Yellowstone to snowmobile the last year you allowed non-guided snowmobilers

in the park. That was a great experience. I came back the next year and the guided tours are a tremendous experience but nothing like a non-guided trip. I am getting old and probably will never be able to snowmobile again, but please develop and adopt a plan that will give other people a chance to experience what I did.

**Corr. ID:** 390                      **Organization:** *Not Specified*

**Comment ID:** 126690            **Organization Type:** Unaffiliated Individual

**Representative Quote:** I have been a long-time supporter of snowmobile access in the Park, since we made trips into the Park from Jackson, Wyoming 15-20 years ago, when trail grooming was just becoming established. We used to make trips to West Yellowstone, where we would stay overnight and return to Jackson. We also stayed at the Snow Lodge and enjoyed that experience. However, times change, and so do many factors that surround the decisions on future management options. Since the guide and BAT requirements were put in effect, the interest in snowmobiling by the general public has been greatly impacted and reduced--thus the reduced use level--well below previous historic patterns. Being required to go with a guide just ruins the experience, because you can't stop where you want and linger-to enjoy viewing or photograph the surroundings!!! You also have to travel the entire trip to Old Faithful--thus eliminating the option of a short morning or afternoon trip that could be accomplished with a private vehicle on plowed roads.

**Corr. ID:** 885                      **Organization:** *Not Specified*

**Comment ID:** 127597            **Organization Type:** Unaffiliated Individual

**Representative Quote:** Please do not further restrict motorized travel in Yellowstone National Park. The park belongs to the people of the United State of American and restrictions are making it impossible for people to enjoy their park in the manner they would like to. I own an Arctic Cat 4-stroke snowmobile that meets all the requirements for winter use in the park but I can't ride it in the park under today's regulations and guide requirements. There are no guides available to guide individuals or small parties in the park. I do not want to ride with a large group. One of the most enjoyable aspects of seeing Yellowstone in the winter used to be being able to see the park with very few people. Parking lots that are full all summer long were virtually empty during the winter months. You can see park features during the winter in a vastly different way with snow on the ground.

**Corr. ID:** 913                      **Organization:** *Not Specified*

**Comment ID:** 127341            **Organization Type:** Unaffiliated Individual

**Representative Quote:** We strongly support responsible use of snowmobiles by visitors without the need of a guide.

**Corr. ID:** 931                      **Organization:** myself

**Comment ID:** 127832            **Organization Type:** Unaffiliated Individual

**Representative Quote:** A guided trip should be an exception rather than the rule. If people want the freedom to go in on their own then that option should be made available as well.

**Corr. ID:** 939                      **Organization:** *Not Specified*

**Comment ID:** 127455            **Organization Type:** Unaffiliated Individual

**Representative Quote:** The expense related to renting a snowmobile and paying a guide is too great a burden for younger people like myself to bear. Snowmobiling in the park would be my first choice to see it, but, as stated the expense is too great. Further, the low number of snowmobiles allowed makes it hard to be able to plan and make reservations accordingly.

**Corr. ID:** 1071                      **Organization:** Snowest

**Comment ID:** 127788            **Organization Type:** Unaffiliated Individual

**Representative Quote:** If you have access to a clean four stroke snowmobile and you know your way through the park you should be able to go through.

**Corr. ID:** 1086                      **Organization:** *Not Specified*

**Comment ID:** 127811            **Organization Type:** Unaffiliated Individual

**Representative Quote:** LET snowmobilers back in the park without a GUIDE!

**Corr. ID:** 1448                      **Organization:** Blue Ribbon Coalition

**Comment ID:** 128970            **Organization Type:** Unaffiliated Individual

**Representative Quote:** It saddens me that I have to have a "guide" to take me in the Park. Please consider taking this "rule" out. Most snowmobilers are responsible and care about our environment.

**Corr. ID:** 1516                      **Organization:** Oregon State Snowmobile Association

**Comment ID:** 128322            **Organization Type:** Unaffiliated Individual

**Representative Quote:** But unfortunately the true specialness of this experience has been lost for our members since the '100% commercially guided' rule was implemented for snowmobilers in 2004. Being herded through the Park by commercial businesses has turned our opportunity for a winter visit into more of an expensive Disneyland experience than it is a national park experience. Yellowstone National Park should be available for individuals rather than to and through solely commercial interests.

**Corr. ID:** 1523                      **Organization:** Wyoming Legislature

**Comment ID:** 128272            **Organization Type:** Unaffiliated Individual

**Representative Quote:** But the real killer to snowmobile travel through the East Gate continues to be the guiding requirement. I am in favor of the proposed pilot project to allow for unguided use and to increase the same. Many citizens are capable of traveling over Sylvan Pass and throughout YNP without a guide and they should be allowed to do so.

**Corr. ID:** 1570                      **Organization:** Park County Commissioners

**Comment ID:** 129291            **Organization Type:** Unaffiliated Individual

**Representative Quote:** - Allowing for the use of non-guided snowmobile excursions into the Park during the winter season.

**Corr. ID:** 1579                      **Organization:** *Not Specified*

**Comment ID:** 129825            **Organization Type:** Unaffiliated Individual

**Representative Quote:** Having to pay for someone to lead or guide this group is a definite disadvantage for people on a budget and a disincentive to come to the park in the winter. I think this is a significant reason why snowmobile numbers plummeted so sharply several years ago when the guide requirement was mandated. Its effect has been that people of modest means, which are the majority of Americans, can't afford to go anymore. To me this is a violation of the NPS's directive, "to provide for the enjoyment of". You are denying enjoyment of the park to people who would like to come, but can no longer afford it. Yes, it makes the NPS's job easier (because there are fewer visitors), but it penalizes regular Americans and denies them access to their park.



**Concern ID:** 23590

**CONCERN STATEMENT:** Commenters requesting a non-guided element in the Winter Use Plan/EIS suggested that such a use could be allowed if non-guided users were certified and had gone through training/an educational component. Specific suggestions for how this could work included a permit system or lottery system.

**Representative Quote(s):** **Corr. ID:** 8 **Organization:** *Not Specified*

**Comment ID:** 126979 **Organization Type:** Unaffiliated Individual

**Representative Quote:** If you allow snow mobile use, have a lottery system for private unguided use, just like grand canyon river permits...This would allow for the freedom to explore the park at your own pace.

**Corr. ID:** 773 **Organization:** *Not Specified*

**Comment ID:** 127113 **Organization Type:** Unaffiliated Individual

**Representative Quote:** People who have purchased snowmobiles that meet the YNP BAT criteria should be allowed access to YNP and GTNP without having to be herded into a guided group. I can see the necessity of having to institute a permit system to grant access so that it doesn't become the same problem that started all this needless regulation.

**Corr. ID:** 783 **Organization:** *Not Specified*

**Comment ID:** 127148 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Allow riders to have paid guides, but also allow some riders, for an additional fee and additional training to enter the park self-guided. Thank you !!

**Corr. ID:** 980 **Organization:** *Not Specified*

**Comment ID:** 128121 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Eliminate the requirement for commercially guided only tours in the park. Guides should still be provided as an option, but snowmobile users should be prove they are responsible enough to become licensed or certified to lead their own families into the park. Whether it be some kind of online license or in person certification would be a detail for the NPS to determine, but the responsibility should be maintained at the individual level if they are qualified.

**Corr. ID:** 1208 **Organization:** *Not Specified*

**Comment ID:** 126394 **Organization Type:** Unaffiliated Individual

**Representative Quote:** To add to that I would say finding a way to let a limited number of people per day take snowmobiles in on unguided trips should be sought. You could do a required visitor education program prior to use (similar to what you do for backcountry trips) and have a permit system in place to regulate the amount of people going in at one time. Again similar to your backcountry use system. The east gate (Cody) should be included in that. Couple that with good law enforcement and the resource should be protected while still allowing public use.

**Corr. ID:** 1443 **Organization:** Families for Outdoor Recreation

**Comment ID:** 128712 **Organization Type:** Unaffiliated Individual

**Representative Quote:** 8 Why can't we have an on line video and or video to watch of the do's and don't in the park? We don't need guides this take away from the experience of the park! Why don't you have to have guide for summer time travel in the park? You have the same condition but more by 10,000 times more people per day? Why is winter time travel have this additional cost? Also why don't x-cross skier and hikers don't need guides to travel in the park?

**Corr. ID:** 1481

**Organization:** *Not Specified*

**Comment ID:** 128534

**Organization Type:** Unaffiliated Individual

**Representative Quote:** My recommendation is this:

1-Require BAT snowmachines

2-Allow private citizens without guides (if deemed necessary, give a training/orientation class or film like you do for campers in the summer)

3-Allow snowmachines to go solo

4-Do not restrict winter access to Snowcoaches only

**Corr. ID:** 1497

**Organization:** *Not Specified*

**Comment ID:** 128512

**Organization Type:** Unaffiliated Individual

**Representative Quote:** I have seen many changes in Yellowstone's winter use and applaud the Park Service on their adaptability and resource protection. Limiting the number of snowmobiles, requiring them to meet BAT standards and to be guided has improved the overall visitor experience immeasurably as recounted by our guests time and time again. When 720 snowmobiles park-wide were allowed to enter Yellowstone, it was a lot. My guides and guests often commented on the congestion during busy times as we approached the allowed number. 318 snowmobiles park-wide does not adequately support our town's winter economy as evidenced by the closure of many businesses this time of year. The science of snowmobile use should indicate an appropriate usage level for these vehicles. In that total number of snowmobiles allowed, there should be a provision for a limited number of individual snowmobiles to enter the Park. In other Parks throughout the system where visitation is limited there are provisions for private use. Dinosaur National Monument and Grand Canyon are prime examples where numbers on the rivers have been limited. There are allowances for both private and commercial trips allocated through a drawing. Yellowstone could do the same with a limited amount of the snowmobile allocations permitted through a draw system. Just like backcountry users today, individual snowmobilers could go through an informative primer educating them to appropriate winter use. This would give the photographers, bird watchers and others the opportunity to visit Yellowstone on their own and use their time appropriately.

**Corr. ID:** 1515

**Organization:** *Not Specified*

**Comment ID:** 128391

**Organization Type:** Unaffiliated Individual

**Representative Quote:** Yellowstone Park should be available to the public for enjoyment and use year round. The current and previous plans have kept people away either due to cost or inconvenience, which skews the statistics to show decreased usage. Many of the locals could guide the guides. There should not be a need for guides for most individuals. If necessary show a short instructional video before users enter the park.

**Corr. ID:** 1537

**Organization:** *Not Specified*

**Comment ID:** 129154

**Organization Type:** Unaffiliated Individual

**Representative Quote:** Secondly, while I understand the necessity of having a guide for snowmobiles and I understand how that has helped with park winter management, I would like to see an option for snowmobiles without guides to enter the Park. My husband and I are local residents and probably know as much or more than many of the guides. Why couldn't we take a test or get some certification to be able to take a snowmobile in the Park without paying a guide? This would alleviate the complaint about the average person needing to spend additional dollars for guide service. Why not make the Park accessible to qualified individuals?

**Concern ID:** 23591

**CONCERN STATEMENT:** Commenters suggested that non-guided snowmobile use should be allowed, provided that the snowmobiles meet BAT requirements.

**Representative Quote(s):** **Corr. ID:** 1 **Organization:** *Not Specified*

**Comment ID:** 126956 **Organization Type:** Unaffiliated Individual

**Representative Quote:** The one thing I disagree with is the use of guides. If you could figure out a way to assure that every snowmobile that enters the park has the best technology available, and then increase the number of park rangers to patrol the park and keep the crazies under wrap then the snowmobile experience would be greatly enhanced. I know from personal experience, having snowmobiled in Yellowstone the last year before guides were required, that my time spent in Yellowstone for a couple of days was the best experience of my life. I came back after guides were required and it just wasn't the same. But, I do favor strict control over the use of snowmobiles in the park, and where they are allowed to operate within the park, but it seems to me the rules that applied in 2003 when I was there were adequate.

**Corr. ID:** 1223 **Organization:** *Not Specified*

**Comment ID:** 126354 **Organization Type:** Unaffiliated Individual

**Representative Quote:** I think you should allow snowmobile OWNERS to be able to provide a drivers license, current registration and proof of insurance as well as proof their machines are up to current emission standards for new machines and those people be allowed into the park without a guide. In other words people who own their own 4 cyl clean emission sleds should be allowed into the park with no guide. Anyone who is wanting to rent a machine or borrow a machine has to have a guide.

**Corr. ID:** 1379 **Organization:** *Not Specified*

**Comment ID:** 127194 **Organization Type:** Unaffiliated Individual

**Representative Quote:** I started snowmobiling in YELLOWSTONE IN 1986,I enjoyed it till we couldn't ride our own sleds in the park anymore. I think we should still be able to ride our own sleds , as long as they are BAT sleds

**Concern ID:** 23592

**CONCERN STATEMENT:** Commenters suggested that non-guided OSV use would not impact park resources if there was increased law enforcement.

**Representative Quote(s):** **Corr. ID:** 144 **Organization:** *Not Specified*

**Comment ID:** 129493 **Organization Type:** Unaffiliated Individual

**Representative Quote:** The policy of requiring guides for all snowmobiles is beyond stupid and is totally offensive. The rules of the road can be posted and any one can follow them just like they do in the summer. Budget for a reasonable level of enforcement just like summer.

**Corr. ID:** 1141 **Organization:** WSA

**Comment ID:** 128000 **Organization Type:** Unaffiliated Individual

**Representative Quote:** You don't have rangers ride in every car why would you require them with every snowmobile group. Patrols would still be needed for sure but to have guided groups seems extreme, have violators loose the privilege of riding in the park for a number of years.

**Corr. ID:** 1355 **Organization:** *Not Specified*

**Comment ID:** 128599      **Organization Type:** Unaffiliated Individual

**Representative Quote:** IT IS BECAUSE OF THIS THAT I STRONGLY RECOMMEND DROPPING THE GUIDEING RULE AND PUT MORRE RANGERS IN PLACE IN CASE THERE IS AN ANIMALE ENCOUNTER ON THE ROADS. I SEE THIS ALL THE TIME IN THE SUMMER WITH RANGERS STOPPING TRAFFIC TO LET BUFFALO HERDS BY. I SEE NO REASON WHY THIS COUDN'T HAPPEN IN THE WINTER TIME, TOO.

**Concern ID:** 23593

**CONCERN STATEMENT:** One commenter stated that the option of non-guided use should not be included in the plan/EIS as it would likely be litigated.

**Representative Quote(s):**      **Corr. ID:** 1514      **Organization:** Not Specified

**Comment ID:** 128417      **Organization Type:** Unaffiliated Individual

**Representative Quote:** - Guiding of winter visitors under the interim plans has shown that winter visitors can experience the winter experience in the park while minimizing the impacts of those visitors to the resource. A move away from this guided requirement would bring us back to the problems that originated the need for the winter plan in the first place. Additionally, three winter EISs, two EAs, and numerous National Park Service press releases have stated that guiding has reduced the impact to wintering wildlife and other resources within the park and that unguided access was causing possible damage to the resource. Based upon this prior documentation, I do not see any possible way that this unguided alternative would not be litigated by an organization, group, or individuals. I am aware of no new data that could be used to counter the claims previously made by past plans (EISs and EAs) for the necessity of guiding.

**Concern ID:** 23594

**CONCERN STATEMENT:** Commenters suggested that non-guided OSV use, specifically snowmobile use, could occur in the park on certain road, during certain times, or by providing the concessioners a certain number of un-guided machines in their daily limit.

**Representative Quote(s):**      **Corr. ID:** 1400      **Organization:** Not Specified

**Comment ID:** 128731      **Organization Type:** Unaffiliated Individual

**Representative Quote:** What I would really like to see is a way for the visitor to be able to enter Yellowstone on a B.A.T. certified snowmobile without having to hire a guide. They could still have the option of a guided tour, but not required. even if the numbers were capped in some way, this would be good for the visitor. Perhaps each concessioner could have a limit on unguided sleds per day along with a limit on guided sleds. This would enable you to still have control on the daily limits. Unguided visitors would need to follow a set of guide lines and instructions before entering the park.

**Corr. ID:** 1416      **Organization:** Not Specified

**Comment ID:** 128402      **Organization Type:** Unaffiliated Individual

**Representative Quote:** I am also in favor of allowing individuals to operate their private BAT snowmachines along the same route between Norris, Canyon, Fishing Bridge, West Thumb, Old Faithful and the South Entrance. Guides should not be required.

**Corr. ID:** 1449      **Organization:** Not Specified

**Comment ID:** 129049      **Organization Type:** Unaffiliated Individual

**Representative Quote:** I recommend immediately cutting non-winter (snow off) road travel by half and increasing the winter (on snow) travel access (as to allow park experience opportunities). Reestablish snowmobile access to the amount negotiated previously (at least a third snowmobile-sided use compromise) at the 1400/ day limit; allow a quarter (up to 350/ day) of private snowmobiles meeting current emission and noise standards to be allowed(still only 5-10% of annual visitors). Allow for limited permitted self-guided park access with travel plan and designated routes allowing for experience options (want to look at swans, or elk longer, access options ski/snowshoe access, etc?). Allow non-motorized access and area designations off limits to vehicles (sure there is substantial currently, but make it official again). This is a huge compromise from pre 2000 & earlier snowmobile rules and allows lower cost access, more management flexibility while maintaining the original benefit and enjoyment of future generations ideals that the park system represents.

**Corr. ID:** 1579

**Organization:** *Not Specified*

**Comment ID:** 129827

**Organization Type:** Unaffiliated Individual

**Representative Quote:** My second idea is to vary the types of visitation you allow in the winter. Keep the snow coaches and keep the guide requirement for much of the winter, but have specified times when it is allowable to come into the park on a snowmobile without a guide. This would enable visitors of more limited financial means to enter the park only beholden for the entrance fee and any lodging or meals that they might choose. It would give them freedom at these times to enjoy the park on their own terms and at their own pace, and let them do what lots of Americans like to do - make their own decisions as individuals.

It would restrict them to certain times when this policy is in effect, but it would be an option they could plan for. Times when I think this policy might be implemented effectively would be between the Christmas and New Year's holidays, around the Martin Luther King holiday weekend and around the President's Day holiday weekend. Allowing unguided snowmobile trips at these and perhaps other times as well would inject some flexibility into winter visitors' trip planning. It would essentially be a compromise between those who would like to see unguided snowmobiling allowed any time, and those who want guided trips-only snowmobiling imposed all the time. I think it would be serving of the park, and of the visitor.

**Concern ID:** 23596

**CONCERN STATEMENT:** One commenter suggested that non-guided snowmobile use could be managed through the use of GPS units on the machines that would track anyone who went off of the road.

**Representative Quote(s):** **Corr. ID:** 467

**Organization:** *Not Specified*

**Comment ID:** 129187

**Organization Type:** Unaffiliated Individual

**Representative Quote:** I want personal snowmobiles to be allowed in the park, without guides, with stiff penalties for breaking laws and regulations. If you need to lock a GPS to each sled as part of the permit and get a credit card deposit until the GPS is returned, then do so. This would guarantee that anyone leaving authorized roads got busted.

**AL5075 - Alternatives: Non-commercially guided OSV Use**

**Concern ID:** 23597

**CONCERN STATEMENT:** Several commenters stated support for an alternative element that would allow individuals to become a non-commercial guide after some level of training has been completed. Some specific suggestions for training were suggested including using the on line "Safe Rider Awareness Program" and involvement in the park and snowmobile community before becoming a non-commercial guide.

**Representative Quote(s):** **Corr. ID:** 878 **Organization:** *Not Specified*

**Comment ID:** 127567 **Organization Type:** Unaffiliated Individual

**Representative Quote:** I would like to see a plan for non-commercial snowmobile guides (some sort of on-line certification) for 8-10 family members and close friends. I would also like to use my own snowmobiles as long as it meets sound and emission criteria.

**Corr. ID:** 979 **Organization:** *Not Specified*

**Comment ID:** 128110 **Organization Type:** Unaffiliated Individual

**Representative Quote:** I feel that is important to include an alternative to provide for an alternate guide system. This leader would certainly have to be qualified to lead his family or group of friends into the park. This could be done with an online course or a course available near or at the park. The current guide system and cost does not lend to a family friendly experience.

**Corr. ID:** 1003 **Organization:** *Not Specified*

**Comment ID:** 127750 **Organization Type:** Unaffiliated Individual

**Representative Quote:** I also believe that you should be able to get certification to lead your own group though the park by snowmobile. Thus having the option of not having to hire a guide through one of the areas outfitters. Yellowstone is an awesome site to see in the winter and should be open for this type of travel for future generations to come! Thanks for hearing my comments.

**Corr. ID:** 1134 **Organization:** *Not Specified*

**Comment ID:** 127961 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Given that recent studies indicate that impacts of snowmobiles have been vastly overstated by some stakeholders, it is appropriate for the agency to develop at least one Alternative that enhances snowmobiling experience. Please consider developing an Alternative that considers increasing the daily limits and an Alternative that considers modification of the Guide system to allow individuals to become certified as guides.

**Corr. ID:** 1473 **Organization:** International Snowmobile Manufacturers Association

**Comment ID:** 128804 **Organization Type:** Unaffiliated Individual

**Representative Quote:** 4. We support the consideration of a limited number of unguided visitors using BAT snowmobiles following pilot project guidelines. Those guidelines could include a team leader who could be certified by Park Management following stated guidelines to include but not be limited to:

- a. Snowmobiling experience
- b. Snowmobile community involvement
- c. National Park Service involvement

d. Safety and wildlife training background

This certified leader would be required to make prior arrangements in certifying themselves with the Park. Individuals riding with a certified leader would be required to use BAT snowmobiles. Groups riding with the certified leader would have to be limited.

**Corr. ID:** 1584

**Organization:** *Not Specified*

**Comment ID:** 129620

**Organization Type:** Unaffiliated Individual

**Representative Quote:** e) Allow for some self-guided snowmobile trips having a smaller group size than that of commercially guided groups. Include a means to provide training of the "self-guide" including their responsibilities that protect the resource yet are not so arduous that they become a de-facto prohibition.

**Corr. ID:** 1588

**Organization:** State of Wyoming- Department of State Parks and Cultural Resources

**Comment ID:** 129655

**Organization Type:** State Government

**Representative Quote:** The on-line Safe Rider! Awareness Program, typically takes someone with snowmobiling experience and knowledge (a prerequisite for leader certification) 1.5 to 3 hours to work through all parts of this education program, which is consistent with what we believe would be a reasonable requirement for a Leader certificate program. This program is available for NPS use if the parks so desire. The Wyoming State Snowmobile Association and the American Council of Snowmobile Associations (ACSA) offer their assistance, both in the short and long-term, to help NPS develop a training program for the certification of group leaders. We firmly believe this approach can be just as effective as the use of commercial guides has been thus far and we are committed to make such a system work for the parks. The actual certification and reservation system that would be required for this program could be operated through a NPS contract with one organization or by partnerships with multiple agencies and organizations in the area.

**Corr. ID:** 1648

**Organization:** Utah Snowmobile Association

**Comment ID:** 129913

**Organization Type:** Civic Groups

**Representative Quote:** Since the preponderance of credible information and data point toward a lack of evidence that snowmobiling is negatively affecting YNP, we believe it is important to develop an alternative that allows for a non-commercial group leader to bring small groups into the Park. Families, small clubs, church organization and even a group of friends miss an opportunity to see YNP due to the onerous guide requirements. A commercial guide adds a level of expense to these typical groups, which results in only the higher income visitors being in a position to see the wonders of the Park in the winter. There should be ample opportunity to develop a system that utilizes existing resources which would provide for the certification of a non-paid guide that can take a small group (say, six, representing the guide, plus five) into the park. This would make the trip more economical, yet still provide reasonable control over access.

**Concern ID:**

23598

**CONCERN STATEMENT:** Commenters suggested that the park include an alternative that looks at a "Certified Leader" pilot project. Commenters stated that this concept was considered in past planning processes and should be considered in this process. Specific suggestions included:

- education requirements for the guide
- a specific maximum group size of 6 (including the leader) and a minimum group size of four
- management of such a program working with commercial guided snowmobile operations to track the numbers of non-commercially guided snowmobiles into the park
- an initial limit of 18-24 snowmobiles per day with a Certified Leader, that could

increase based on adaptive management

It was also suggested that if this concept is adopted, Certified Group Leaders should account for 25% of the daily snowmobile limit in the park.

**Representative Quote(s):** **Corr. ID:** 1465 **Organization:** Governor, State of Wyoming

**Comment ID:** 128877 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Non-Commercial Guiding

I specifically request that the NPS analyze allowing 25% of the daily entrance numbers to be non-commercial trips that are led by a certified trip leader. In echoing the comments made by the Wyoming State Trails Division and the Wyoming Snowmobile Association, requiring 100% of the snowmobile trips into Yellowstone to be commercially guided is excessive and unreasonable. With the cost as high as \$250 per day to take a guided trip, winter access to Yellowstone has become cost prohibitive to most families and is a significant factor in the declining numbers accessing the Park each winter. Allowing non-commercial access to Yellowstone will help restore a viable and an affordable level of winter visitation to Yellowstone.

The Wyoming State Parks and Cultural Resources Department, in its comment letter, has suggested a Certified Group Leader Pilot Project mirroring a proposal that was included in the 2007 EIS for Winter Use in Yellowstone. I ask that the NPS include the Pilot Project proposal outlined in the comment letter submitted by State Parks in the analysis for the current EIS.

**Corr. ID:** 1483 **Organization:** American Council of Snowmobile Associations

**Comment ID:** 128688 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Certified Leader Requirement: This concept was proposed in 2006 during the EIS process. We continue to believe it has strong merit as a winter management tool. A Certified Leader would be similar to what has been called a non-commercial guide during previous planning processes. However, we believe "Certified Leader" better describes the responsibility expectations of a person leading the group since non-commercial simply means 'not for profit.' Each leader would be required to make prior arrangements for both educating and certifying themselves as to the leadership responsibilities placed upon them to lead a group through the Park, as well as be responsible for acquiring appropriate reservations and permits for their group's entry into the Park. Additionally, the person would have to certify they are receiving no payment or other compensation from their group members for their leadership services.

We believe their entries could be appropriately coordinated and handled through commercial vendors at or near park entrances since many would likely need to rent BAT snowmobiles for their group. Under this approach a few non-commercial entries could be assigned to select snowmobile businesses, as appropriate, along with their other commercially guided entries. Through their Park operating permit these gateway businesses could adequately manage and monitor non-commercial entries, so this would not require a separate reservation system to be managed by the Park.

**Corr. ID:** 1559 **Organization:** Wyoming State Snowmobile Association

**Comment ID:** 129347 **Organization Type:** Recreational Groups

**Representative Quote:** We believe their entries could be appropriately coordinated and handles through commercial vendors at or near park entrances since many would likely need to rent BAT snowmobiles for their group. Under this approach a few non-commercial entries could be assigned to select snowmobile businesses, appropriate, along with their other commercially guided entries. Through their Park operating permit these gateway businesses could adequately manage and monitor non-commercial entries,



so this would not require a separate reservation system to be managed by the Park.

We propose that the maximum size of groups led by Certified leaders be six (five plus the leader) to facilitate tighter control of group actions by the leader, but also that a minimum group size of four (three plus the leader) be established to minimize total numbers of groups. We also propose that all members of a group escorted by Certified Leaders possess a valid Motor Vehicle Operator's License and a certificate of completion from a snowmobile safety education class provided by a state/provincial snowmobile association or governmental snowmobile education program. This would help ensure that all group members have some level of prior snowmobiling safety knowledge as well as prior snowmobile operating experience.

Group leader certification could be accomplished a number of ways either on-line or in partnership with gateway communities or state snowmobile programs and associations. There are a number of templates available within the snowmobiling community and we offer our association's assistance, along with that of the American Council of Snowmobile Associations (ACSA), in developing a certification that we believe can be just as effective as the use of commercial guides has been thus far.

**Corr. ID:** 1585                      **Organization:** Office of the Governor, State of Wyoming

**Comment ID:** 129603            **Organization Type:** State Government

**Representative Quote:** Non-Commercial Guiding

I specifically request that the NPS analyze allowing 25% of the daily entrance numbers to be non-commercial trips that are led by a certified trip leader. In echoing the comments made by the Wyoming State Trails Division and the Wyoming Snowmobile Association, requiring 100% of the snowmobile trips into Yellowstone to be commercially guided is excessive and unreasonable. With the cost as high as \$250 per day to take a guided trip, winter access to Yellowstone has become cost prohibitive to most families and is a significant factor in the declining numbers accessing the Park each winter. Allowing non-commercial access to Yellowstone will help restore a viable and an affordable level of winter visitation to Yellowstone.

The Wyoming State Parks and Cultural Resources Department, in its comment letter, has suggested a Certified Group Leader Pilot Project mirroring a proposal that was included in the 2007 EIS for Winter Use in Yellowstone. I ask that the NPS include the Pilot Project proposal outlined in the comment letter submitted by State Parks in the analysis for the current EIS.

**Corr. ID:** 1588                      **Organization:** State of Wyoming- Department of State Parks and Cultural Resources

**Comment ID:** 129626            **Organization Type:** State Government

**Representative Quote:** 2. Certified Leader Groups - it is critical that at least 25% non-commercially guided (Certified Leader Groups) be allowed within Yellowstone to help restore a viable level of winter visitation to Yellowstone. It is important that our constituents have affordable access.

**Corr. ID:** 1588                      **Organization:** State of Wyoming- Department of State Parks and Cultural Resources

**Comment ID:** 129648            **Organization Type:** State Government

**Representative Quote:** We believe EPE Compliant snowmobiles, in limited numbers, can be used to appropriately return a small degree of non-commercial access to the east side of Yellowstone. We suggest a pilot program be established which would allow perhaps up to 18 to 24 EPA compliant snowmobiles per day through both the east and south gates as part of groups led by Certified Leaders. This would be a starting point and, through Adaptive Management and monitoring, the Park would have the ability to adjust

numbers up or down annually based upon success. This approach would supplement, not replace, existing commercial snowmobile operations these to gates. And all that is being proposed as starting point is a total of 36 to 48 EPA Compliant Snowmobiles park-wide on a trial basis through a pilot program - hardly a number which would overwhelm the experience like in the old days.

**Corr. ID:** 1588

**Organization:** State of Wyoming- Department of State Parks and Cultural Resources

**Comment ID:** 129654

**Organization Type:** State Government

**Representative Quote:** Certified Leader Requirements (pilot project)

This would tied to the general description outlined for 'non-commercial tours' in Alternative 4- Guiding Requirements at the bottom of page 46 of the DEIS. One member of the group (while not charging fee to other members of their group) would be required to make prior arrangements for education and certifying themselves in advance of their trip into Yellowstone. This certification as a Group Leader would then enable them to assume leadership responsibilities required to lead a group into the park. The Leader would be responsible for ensuring the group obtained their required reservations, entrance permits, and BAT snowmobiles in advance of their trip, as well as for providing the required supervision and oversight of group member while they are in the park. Specific requirements should include:

1. The individual must have actual snowmobiling experience and knowledge. An individual who has not snowmobiled at anytime in the past would not be eligible.
2. The individual must possess a valid certificate of completion of a snowmobile safely course administered by a state, province, the American Council of Snowmobile Associations, the Canadian Council of Snowmobile Organizations, Tread Lightly!, or any other generally recognized certifying organization. This will help eliminated those who have no previous snowmobiling experience.
3. The individual must pass an annual certification course administered by the parks or their designee. The on-line Safe Rider! Snowmobile Safety Education Awareness Program available at [www.snowiasa.org](http://www.snowiasa.org) or [www.snowmobilers.org](http://www.snowmobilers.org) and augmented with park-specific information about wildlife encounters and park rules, would provide a good framework from which to build a Leader certification course.
4. The individual must obtain any reservations, permits, and BAT equipment required for the group's trip into Yellowstone.
5. The individual would be required to check-in with the park or their designee to obtain the most current information and advisories prior to entering the park on the day of their permitted trip.
6. Non-compliance with any terms and condition imposed upon Group Leaders by NPS shall result in immediate revocation of the individual's Leader certification (along with any other penalties applicable for park rule violations), as well as a ban on any future Leader certification for the individual (or for a set number of years).

**Corr. ID:** 1588

**Organization:** State of Wyoming- Department of State Parks and Cultural Resources

**Comment ID:** 129650

**Organization Type:** State Government

**Representative Quote:** Requiring that 100% of snowmobile visitors in Yellowstone be led by a commercial guide is undesirable since it has proven to be detrimental to providing an adequate level of winter visitor use in the park. At least 25% of daily snowmobile entries should be available to be led by non-commercial Certified Group Leaders who have taken a short certification course and would control and be responsible for managing the actions of their groups. Certified Groups would still be heavily regulated and would be very different than historic unguided snowmobile access when winter use was generally unmanaged. Furthermore, this limited access would always be subject to monitoring and review and ultimately be subject to change under the park's underpinning adaptive management principles.

**Corr. ID:** 1588                      **Organization:** State of Wyoming- Department of State Parks and Cultural Resources

**Comment ID:** 129656            **Organization Type:** State Government

**Representative Quote:** Certified Leader Group- Member Requirements (pilot project)  
We believe the purpose of Certified Leader led groups should be to provide an opportunity for experienced snowmobilers to visit the parks at their own pace versus at the pace driven by a commercial guide. Therefore, we believe that all group members who are operating a snowmobile should also have prior snowmobile experience. Specific requirements for group member should include:

1. All snowmobile operators who are members of a group escorted by a Certified Leader must possess a valid Motor Vehicle Operator's License.
2. All snowmobile operators who are members of a group escorted by a Certified Leader must possess a valid certificate of completion of a snowmobile safety course administered by a state, province, the American Council of Snowmobile Associations, the Canadian Council of Snowmobile Organizations, Tread Lightly!, or any other generally recognized certifying organization. (This would be comparable to WY Game and Fish requirements that all big game hunters must possess a Hunter Education Program Certificate, to ensure a basic knowledge about safe practices.

This will help ensure that all snowmobile operators in the group have some level of prior snowmobiling safety knowledge and operating experience. It would still allow inexperienced individuals to travel with the group as a passenger on a snowmobile.

Persons with no prior snowmobile experience would be required to work with a commercial snowmobile tour operator if they desire to drive a snowmobile themselves within Yellowstone.

**Concern ID:** 23599

**CONCERN STATEMENT:** Commenters provided suggestions for possible guides that were non-commercial. Specific suggestions included using park rangers as guides, and having local snowmobile club members trained as guides.

**Representative Quote(s):** **Corr. ID:** 1208                      **Organization:** *Not Specified*

**Comment ID:** 126396            **Organization Type:** Unaffiliated Individual

**Representative Quote:** Another possible idea would be to work with local snowmobile clubs that would have members that could be trained as park guides who could guide trips on a volunteer or non-profit basis. If they violate the rules, the club loses its privileges. I'm sure you could find clubs that would provide volunteers to guide out of the east gate. Just limit the amount of people allowed at one time and the current guides would still have business, especially if you went back to the 540 per day number.

**Corr. ID:** 1208                      **Organization:** *Not Specified*

**Comment ID:** 126395            **Organization Type:** Unaffiliated Individual

**Representative Quote:** You could also offer special ranger guided trips for the public on a scheduled basis. Basically people bring their own snowmobiles (or rent one) and could be guided by a ranger through the park on a set schedule.

**Concern ID:** 23600

**CONCERN STATEMENT:** Commenters provided specific suggestions for the level of non-commercially guided OSV use that should occur in the park including:  
-720 snowmobiles a day, with 25% non-commercially guided  
-group size limit of 6 for non-commercially guided use  
- non-commercially guided use should be no less than 20% of overall daily limits

**Representative Quote(s):** **Corr. ID:** 1465 **Organization:** Governor, State of Wyoming  
**Comment ID:** 128822 **Organization Type:** Unaffiliated Individual  
**Representative Quote:** Suggested Alternative

I ask that the NPS consider an alternative that analyzes a daily limit of 720 snowmobiles a day, provides for 25% of those daily entries to be non-commercially guided, ensures that East Gate of Yellowstone remain open, consistent with the provisions in the Sylvan Pass Agreement, and considers allowing a percentage of EPA compliant snowmobiles. This alternative both maximizes public access while at the same time protects park resources.

**Corr. ID:** 1589 **Organization:** Montana Fish, Wildlife, and Parks  
**Comment ID:** 129837 **Organization Type:** State Government

**Representative Quote:** Place reasonable limits on group size that allows for non-commercially guided (i.e. 6) and commercially guided groups (i.e. 11) to use groups to maintain control.

**Corr. ID:** 1656 **Organization:** Board of County Commissioners for Park County, Wyoming  
**Comment ID:** 129969 **Organization Type:** State Government

**Representative Quote:** In order to recognize Congress's determination that free access to national parks should not be unduly limited, the Park Service should seriously consider, at a minimum, a pilot project aimed at allowing non-commercially guided snowmobile access to Yellowstone. Individuals could be trained in a manner similar to commercial guides prior to entry. Non-commercial guides and their companions could represent a percentage of daily entries at a particular gate while maintaining enough daily numbers to secure the viability of commercial guide operations. Recent reductions in snowmobile numbers are a reflection of, among other things, the requirement that all entries be commercially guided. Park County would propose that non-commercially guided snowmobile numbers be no less than 20% of the overall daily numbers.

### **AL5080 - Alternatives: Adjustable OSV Caps**

**Concern ID:** 23601

**CONCERN STATEMENT:** Commenters suggested that the cap for OSVs be seasonal instead of daily. Some commenters further suggested a seasonal cap, with an additional daily cap not to exceed.

**Representative Quote(s):** **Corr. ID:** 1572 **Organization:** Citizens for Balanced Use  
**Comment ID:** 129364 **Organization Type:** Civic Groups

**Representative Quote:** The Park is only open for winter use by snowmobiles for a short time period each year. Several days of the winter season have very harsh weather and many people will not make the trip into the Park when severe weather is occurring. Your proposed plan does nothing to address this issue or the fact that these people may wish to stay over in West Yellowstone another night and hope for better weather the following day. The extra day stay would boost the economy of West Yellowstone and help local

businessmen. I would propose the scoping document include an alternative for the DEIS that instead of a maximum amount of daily visitors to the Park by snowmobiles, that a maximum annual visitor annual would be much better. Businesses could then plan for the annual amount of use and the days of adverse weather would not affect their business as much or business plan so severely. Several rivers in Montana do much the same as to allow for an annual amount or number of floats per year. This approach seems more logical and fair.

**Corr. ID:** 1575                      **Organization:** Yellowstone Tour & Travel Summer and Winter

**Comment ID:** 129547              **Organization Type:** Business

**Representative Quote:** I would suggest a seasonal cap with appropriate daily flexible entries would better serve the needs of both the public and the operators.

**Corr. ID:** 1583                      **Organization:** Yellowstone Arctic Yamaha

**Comment ID:** 129807              **Organization Type:** Business

**Representative Quote:** Another option would be to issue each concessionaire 2,700 seasonal use days (90 days X the 31 permits they would receive based on the 245 snowmobile west entrance allocation) and allow each operator to use his allocations as needed but not to exceed 320 snowmobiles per day to enter the west entrance. It is my opinion that a simple spreadsheet application could easily track these numbers for each concessionaire.

**Corr. ID:** 1648                      **Organization:** Utah Snowmobile Association

**Comment ID:** 129923              **Organization Type:** Civic Groups

**Representative Quote:** We support this management change and believe at least one alternative should have the provision of increasing the daily limit to a more reasonable level, coupled with a flexible daily limit requirement that allows credit for slow visitation days. This can be controlled by establishing a cap whereby the number of peak days could not exceed a predetermined percentage of the total season days. Our support for this approach is tied to the inclusion of an alternative that also has the changes in the commercial guide requirement and BAT requirement as already identified above

**Corr. ID:** 1683                      **Organization:** Blue River Coalition

**Comment ID:** 130178              **Organization Type:** Unaffiliated Individual

**Representative Quote:** In additions to considering raising the daily limit, at least one alternative should include a flexible daily limit paradigm that allows "credit" for very slow days in order to provide for a higher daily limit on "peak days". Such a system would include a limit, for example, the number of peak days would not exceed a certain percentage of the total season days.

**Concern ID:** 23602

**CONCERN STATEMENT:** Commenters suggested that flexible OSV caps be implemented around peak use times. These suggestions included allowing more OSV during busy holiday periods (Christmas/New Years week, Martin Luther King Day, Presidents Day) to accommodate an increased demand during those periods. One specific suggestion was to allow up to 20% more OSV use on peak days, with no more than 20% of the days in the season identified as peak days.

**Representative Quote(s):** **Corr. ID:** 963                      **Organization:** Not Specified

**Comment ID:** 128359              **Organization Type:** Unaffiliated Individual

**Representative Quote:** The WUP's have specifically instituted a program that will systematically lower the number of allowed visitors year by year (proof is in the numbers). Any economy class in any community college would have seen the flaws in the same number of visitors being allowed on a daily basis, and that the "ideal" average can never be reached. As local business owners, it is ever apparent in these tough economic times, as well as fruitful times, that people are vacationing in short bursts focused on major holidays, especially in winter months when children are in general occupied in school etc.

For this reason, I feel that the new plan needs to account for the thousands of people desiring to see the park at peak Holiday seasonal times and weekends. An example of this, my local restaurant did nearly 10 times the business on President's Day weekend (February 12th, 13th and 14th) than it did the week before, 3 days of business against 7. So the new plan needs to arrive with a "fluctuating" daily allotment, allowing for business growth, not the stifling of growth as has been the effect of past plans. These PRIME dates would be easily established by using historical for the past 20 years, include the pre and post WUP era's numbers, look at them with interest and common sense, and arrive at some target goals.

**Corr. ID:** 1216

**Organization:** *Not Specified*

**Comment ID:** 126380

**Organization Type:** Unaffiliated Individual

**Representative Quote:** And in conjunction with that, allowing for a peak days allocation would also be helpful. On days around Christmas/New Years and President's Day for example the number of people want to visit the Park is higher than say the week after President's Day. Allowing a certain number of peak days where limits are higher would again ensure that people who have spent a considerable amount of time and money to experience the Yellowstone Park would not be turned away. No such limits exist during the summer on autos or even on snow coaches in the winter time, there should be a way to accommodate more snowmobilers during these peak times.

**Corr. ID:** 1300

**Organization:** *Not Specified*

**Comment ID:** 128247

**Organization Type:** Unaffiliated Individual

**Representative Quote:** However, to allow for expansion, I recommend that the number of daily snowmobiles be increased to 350 with a further increase to 400 during the three winter holiday seasons (the week of Christmas to New Years, the 3-day Martin Luther King holiday, and the 3-day President's Day holiday). The holiday seasons are the times of greatest demand and the time when local businesses can reap the most economic benefit. I also recommend an increase to 100 snowcoaches a day with an increase to 130 during the holiday stated above.

**Corr. ID:** 1473

**Organization:** International Snowmobile Manufacturers Association

**Comment ID:** 128801

**Organization Type:** Unaffiliated Individual

**Representative Quote:** It is stated that the National Park Service will be taking a fresh, new, hard look at issues. In following that philosophy, we would recommend the Park Service take a good hard look at the following ideas:

1. Please consider a flexible daily snowmobile limit with increased limits and flexibility on weekends and specified holidays. The flexible daily snowmobile schedule will allow visitors into the park when they have the time to recreate, which is usually on weekends and holidays. This will also strengthen the commercial sector in that it will allow those operators to reach the demand requirements of the market when the demand is present. No one should expect a 100% fill rate to any quota on a daily basis, however, there are days that are known to generate additional demand. This trade off can be easily managed by studying historical use data.

**Corr. ID:** 1531

**Organization:** Cody Country Chamber of Commerce

**Comment ID:** 129379

**Organization Type:** Town or City Government

**Representative Quote:** It is the combination of winter recreation opportunities that we would like to see addressed in the EIS. When you put together downhill skiing, Nordic skiing, snowshoeing, sledding, snowmobile and snow coach trips into the Park, Cody can begin to truly promote itself as a winter destination. This is why it is important to consider at least 720 BAT snowmobiles per day and at least 78 snow coaches per day in the Park, with a higher number through the East Entrance than is currently allowed (with the understanding that traffic depends on weather and avalanche danger). These numbers would give concessionaires a more predictable business and allow them to invest in expanding their business. We recommend you assess these higher levels in the EIS, as they present more attractive business opportunities.

In addition, we recommend that you assess the impact of greater flexibility that would allow higher numbers during those times when visitors are most likely to want to go through the East Entrance: the two weeks around Christmas and New Year's and the three-day weekends of Martin Luther King Day and President's Day. It should be noted that world-class ice climbing on the South Fork of the Shoshone River brings several hundred outdoor enthusiasts to Cody on weekends such as President's Day. Additional access to Yellowstone through the East Entrance on these weekends would offer this group of visitors additional choices and encourage a longer stay in Cody. Overall, having a more predictable - and higher -access level would enable better planning and promotion for all activities along the North Fork Corridor.

All of this is in keeping with your stated objective of providing visitors access to winter opportunities appropriate to the Park that are universally accessible.

**Corr. ID:** 1561

**Organization:** *Not Specified*

**Comment ID:** 129329

**Organization Type:** Unaffiliated Individual

**Representative Quote:** However, to allow for expansion, I recommend that the number of daily snowmobiles be increased to 350 with a further increase to 400 during the three winter holiday seasons (the week of Christmas to New Year's, the 3-day Martin Luther King holiday, and the 3-day President's Day holiday). The holiday seasons are the times of greatest demand and the time when local businesses can reap the most economic benefit. I also recommend an increase to 100 snowcoaches a day with an increase to 130 during the holiday stated above.

- 350 daily quota for commercially guided snowmobiles except the three holidays listed below
- 450 daily quota for commercially guided snowmobiles during the three winter holiday period (the week of Christmas to New Year's, the 3-day Martin Luther King holiday, and the 3-day President's Day holiday)
- 100 daily quota for snowcoaches and snowvans
- 130 daily quota for snowcoaches/snowvans during the three winter holiday period (the week of Christmas to New Year's, the 3-day Martin Luther King holiday, and the 3-day President's Day holiday)

**Corr. ID:** 1580

**Organization:** Blue Ribbon Coalition

**Comment ID:** 129862

**Organization Type:** Recreational Groups

**Representative Quote:** The EIS needs to consider flexible limits on the numbers of snowmobiles that daily enter the Park from all gates. Consideration should be given to two concepts.

First, if the total number of snowmobiles allowed in the Park daily is 450, then certain days of the winter season a 20% increase of 90 additional machines should be allowed on

those peak days. Peak days would be established in advance of the season. The number of peak days would not exceed 20% of the total season days.

Second, that the total number of snowmobiles allowed in the Park on a daily basis be available to each gate with a base allocation of the current historical numbers. Example, using current allocation of 318 for all gates, base allocation at the West Gate is 160. If West Gate operators know in advance that they will not be using the full 160 then the other gates could use the left over allocation at their respective gates. A system would be developed to deal with this reallocation process.

Please add my name to the Yellowstone Winter Use mailing list and keep me informed as the EIS process and decision.

**Corr. ID:** 1659                      **Organization:** Capital Trail Vehicle Association (CTVA)

**Comment ID:** 129981              **Organization Type:** Recreational Groups

**Representative Quote:** Consideration should be given to two concepts.

a. First, if the total number of snowmobiles allowed in the Park daily is 450, then certain days of the winter season a 20% increase of 90 additional machines should be allowed on those peak days. Peak days would be established in advance of the season. The number of peak days would not exceed 20% of the total season days.

b. Second, that the total number of snowmobiles allowed in the Park on a daily basis be available to each gate with a base allocation of the current historical numbers. Example, using current allocation of 318 for all gates, base allocation at the West Gate is 160. If West Gate operators know in advance that they will not be using the full 160 then the other gates could use the left over allocation at their respective gates. A system would be developed to deal with this reallocation process.

**Concern ID:** 23606

**CONCERN STATEMENT:** Commenters suggested that an alternative model a variation of flexible daily entry based on a visitation curve, rather than assumption of 100% use. It was suggested that this type of analysis would result in a higher, and more accurate, OSV cap being set.

**Representative Quote(s):** **Corr. ID:** 1483                      **Organization:** American Council of Snowmobile Associations

**Comment ID:** 128690              **Organization Type:** Unaffiliated Individual

**Representative Quote:** Daily Limits and Variable Limits: It seems the key to establishing daily limits and variable limits is ensuring that the base cap/daily limit is set properly at a sustainable level, so the peak day increase would not need to be so extreme - perhaps somewhere between 10% and 20%.

At least one alternative should model some variation of flexible daily entries based upon a visitation curve versus upon an assumption of 100% use. Snowmobile alternatives should most likely focus on daily caps between 300 and less than 500 if the existing '100%' rules stay in place; if these rules are relaxed somewhat, it may be appropriate to model for up to 700 snowmobile entries - but only if the rules are relaxed (remember 'keep doing the same thing while expecting different results' - it's not going to happen)

**Corr. ID:** 1559                      **Organization:** Wyoming State Snowmobile Association

**Comment ID:** 129350              **Organization Type:** Recreational Groups



**Representative Quote:** On the other hand, we recognize the value of having different caps for different days of the season - tearing back to our comments regarding establishing 'visitation curves' for modeling which we discussed on page 4. There are holiday periods when more citizens are likely, or at least desiring, to visit their national parks, irrespective if it is New Years, President's Day, or the 4th of July. It would be good to try to accommodate more of them, but the bottom line for a successful and sustainable winter use plan is that those visits are going to have to fit within parameters framed by over a decade of debate. And unfortunately that baggage makes 'sustainable' and 'successful' a bit of a challenge.

We have seen some proposals that suggest allowing commercial operators to bump their use up on peak days by as much as 33% and then take that increase off low-use days. Our perspective is that 33% is way too high and would adversely affect the long-term sustainability of snowmobile access. The key to this issue is ensuring that the base cap/daily limit is set properly at a sustainable level, so the peak day increase would not need to be so extreme - perhaps somewhere between 10% and 20%.

At least one alternative should model some variation of flexible daily entries based upon a visitation curve versus upon an assumption of 100% use. Snowmobile alternatives should most likely focus on daily caps between 300 and less than 500 if the existing '100%' rules stay in place; if these rules are relaxed somewhat, it may be appropriate to model for up to 700 snowmobile entries - but only if the rules are relaxed (remember 'keep doing the same thing while expecting different results' - it's not going to happen).

**Corr. ID:** 1591                      **Organization:** California - Nevada Snowmobile Association

**Comment ID:** 129910              **Organization Type:** Recreational Groups

**Representative Quote:** At least one alternative should model some variation of flexible daily entries based upon a visitation curve versus upon an assumption of 100% use. Snowmobile alternatives should most likely focus on daily caps between 300 and less than 500 if the existing '100%' rules stay in place; if these rules are relaxed somewhat, it may be appropriate to model for up to 700 snowmobile entries - but only if the rules are relaxed (remember 'keep doing the same thing while expecting different results' - it's not going to happen)

**Concern ID:** 23607

**CONCERN STATEMENT:** One commenter suggested that OSV caps be implemented on a weekly basis.

**Representative Quote(s):** **Corr. ID:** 1461                      **Organization:** Not Specified

**Comment ID:** 128997              **Organization Type:** Unaffiliated Individual

**Representative Quote:** I implore you to make a winter use plan that allows people to access their park unhindered. The plan that was in place for the 08-09 season works fine. This allows people to see the park. Or how bout giving us a weekly allotment of permits? Not a daily limit. That way on busy days you can accommodate and than the slower days balance it out.

Please DO NOT take OUR national park away from us.

**Concern ID:** 23608

**CONCERN STATEMENT:** Some commenters felt that if flexible OSV use limits were implemented, that people may take advantage of this and only discuss/photograph the highest use days, in an effort to mischaracterize OSV use and in the future, lower OSV use levels.

**Representative Quote(s):** **Corr. ID:** 1559 **Organization:** Wyoming State Snowmobile Association

**Comment ID:** 129349 **Organization Type:** Recreational Groups

**Representative Quote:** On the other hand, perhaps 318 is too low of a daily cap - or maybe it is an appropriate ballpark if the entries are properly allocated so they can be utilized where there is a demand for them. We don't know the answer to that and hesitate to speculate what is right or wrong without having more data available to us. But what we do know is that it appears it will be difficult to sell anything above 500 to the DC court as long as they are involved in discussions and legal wrangling. And in the end, based upon lessons learned from experiences since 2004, it is likely that 250 and 450 snowmobile entries per day will be plenty sufficient if the existing rules stay unchanged. If any parts of the rules are relaxed, then discussions about larger numbers would be warranted - but if not, such arguments and discussions are an unproductive exercise which ultimately only tarnish the perception of snowmobiling in the Park.

Regarding flexible or variable daily limits, we have mixed feelings. We believe decisions need to be made that will help ensure access for the long-term versus only helping get through the near-term. For that reason we have always been hesitant to support variable limits since it could easily create what we'd call 'CNN days' i.e. days when snowmobile opponents would know to 'bring their cameras and stage their information gathering' because they know they'll 'document' worst-base scenarios. While those 'days' may not necessarily be bad examples, nonetheless they could create easy scenarios for the spin-masters to turn altered peak days into something they really are not. As a result, getting a few more snowmobiles in the park on a few days of the year may actually result in fueling further declines in access opportunities over the long-term. Our goal is for the new plan to be sustainable versus only making the pocketbooks of a few businesses feel a bit better for a short time.

**Corr. ID:** 1591 **Organization:** California - Nevada Snowmobile Association

**Comment ID:** 129909 **Organization Type:** Recreational Groups

**Representative Quote:** Regarding flexible or variable daily limits, we have mixed feelings. We believe decisions need to be made that will help ensure access for the long-term versus only helping get through the near-term. For that reason we have always been hesitant to support variable limits since it could easily create what we'd call 'CNN days' i.e. days when snowmobile opponents would know to 'bring their cameras and stage their information gathering' because they know they'll 'document' worst-case scenarios. While those 'days' may not necessarily be bad examples, nonetheless they could create easy scenarios for the spin-masters to turn altered peak days into something they really are not. As a result, getting a few more snowmobiles in the park on a few days of the year may actually result in fueling further declines in access opportunities over the long-term. Our goal is for the new plan to be sustainable versus only making the pocketbooks of a few businesses feel a bit better for a short time.

On the other hand, we recognize the value of having different caps for different days of the season -tiering back to our comments regarding establishing 'visitation curves' for modeling which we discussed on page 4. There are holiday periods when more citizens are likely, or at least desiring, to visit their national parks, irrespective if it is New Years, President's Day, or the 4<sup>th</sup> of July. It would be good to try to accommodate more of them, but the bottom line for a successful and sustainable winter use plan is that those visits are going to have to fit within parameters framed by over a decade of debate. And unfortunately that baggage makes 'sustainable' and 'successful' a bit of a challenge.

We have seen some proposals that suggest allowing commercial operators to bump their use up on peak days by as much as 33% and then take that increase off low-use days. Our perspective is that 33% is way too high and would adversely affect the long-term sustainability of snowmobile access. The key to this issue is ensuring that the base cap/daily limit is set properly at a sustainable level, so the peak day increase would not need to be so extreme - perhaps somewhere between 10% and 20%.

**Concern ID:** 23609

**CONCERN STATEMENT:** Commenters provided general support for some sort of system that implements flexible caps on OSV use.

**Representative Quote(s):** **Corr. ID:** 1180 **Organization:** *Not Specified*  
**Comment ID:** 128120 **Organization Type:** Unaffiliated Individual  
**Representative Quote:** Be flexible with daily limits.  
**Corr. ID:** 1185 **Organization:** Montana Snowmobile Assn.  
**Comment ID:** 128130 **Organization Type:** Unaffiliated Individual  
**Representative Quote:** I believe the guide system needs to be more flexible, also the quota system needs to have flexible as well.  
**Corr. ID:** 1581 **Organization:** West Yellowstone Economic Development  
**Comment ID:** 129841 **Organization Type:** Non-Governmental  
**Representative Quote:** Establish a daily quota for snowmobiles and snow coaches that balance visitor access, resource protection, and sustainable economic opportunity for the gate communities.  
- Incorporate a flexible use policy to this daily quota in which the total number of snowmobiles can exceed the threshold on certain days and must be under the threshold on other days.  
**Corr. ID:** 1647 **Organization:** International Snowmobile Manufactures Association  
**Comment ID:** 129932 **Organization Type:** Business  
**Representative Quote:** 2. We support the Park Manager's authority to utilize adaptive management to make adjustments in snowmobile use levels. We agree the adjustment in these levels could include the visitor and guide education, timing of entries, group sizes, and overall visitation numbers.

**Concern ID:** 23610

**CONCERN STATEMENT:** Commenters suggested having a snowmobile limit of 500 a day, and then a flexibly system where operators could exceed that number by 33% for 20 days, decrease use by 33% for 20 days, and maintain use at 500 for the rest of the season. This same concept was also suggested, with a base number of 490 snowmobiles a day. Some commenters felt that this concept was good, but 33% was too high and that the increased use days should be around 10% to 20%

**Representative Quote(s):** **Corr. ID:** 911 **Organization:** West Yellowstone Snowmobile and Snowcoach Operators  
**Comment ID:** 127915 **Organization Type:** Business

**Representative Quote:** Please consider a Flexible Daily Snowmobile Limit with increased limits and flexibility (as high as is defensible) explained as follows:

Currently 318 snowmobile entries are allowed park wide in approximately 90 days. We are assuming that any measurement should use 318 as a base number that was operated under the EA, not zero. We propose increasing that number to 490 with "flexible daily limits" allowing snowmobiles to exceed that number by 33% for 20 days with a like decrease of 33% for 20 days and a balance of 50 days to have the base number of 490 per day.

Prior to this year the West Entrance has had 55% of the total allocations. We are requesting a return to that percentage.

However, for purposes of illustration, based on a 50% allocation and applying the same park wide scenario, under a "flexible daily snowmobile limit" the West Gate would receive the following allocation under this possible scenario:

245 snowmobiles X 90 days would equal 22,050 snowmobiles per season. Total 22,050

245 snowmobiles for 50 days equals 12, 250 snowmobiles allowed <12,250>

33% higher (325) for 20 days would equal 6,500 snowmobiles allowed <6,500>

33% lower (145) for 20 days would equal 2,900 snowmobiles allowed <3,300>

This would total (22,050) 0

**Corr. ID:** 1431

**Organization:** Park County Commission

**Comment ID:** 128983

**Organization Type:** Unaffiliated Individual

**Representative Quote:** During this scoping process we would like to propose several alternatives that would allow more of the public to enjoy Yellowstone with their choice of over-snow vehicles and at the same time bring back into the community a viable winter economy. We suggest increasing the limits on snowmobiles and snowcoaches up to the maximum sustainable levels that can be supported by scientific studies. Please consider a Flexible Daily Snowmobile Limit with increased limits and flexibility as follows:

- Increasing the daily entry numbers to around 500 with "flexible daily limits" allowing snowmobiles to exceed that number 33% for 20 days with a like decrease of 33% for 20 days and the balance of 50 days to have the base number of 500 per day.

**Corr. ID:** 1516

**Organization:** Oregon State Snowmobile Association

**Comment ID:** 128358

**Organization Type:** Unaffiliated Individual

**Representative Quote:** We have seen some proposals that suggest allowing commercial operators to bump their use up on peak days by as much as 33% and then take that increase off low-use days. Our perspective is that 33% is way too high and would adversely affect the long-term sustainability of snowmobile access. The key to this issue is ensuring that the base cap/daily limit is set properly at a sustainable level, so the peak day increase would not need to be so extreme - perhaps somewhere between 10% and 20%.

At least one alternative should model some variation of flexible daily entries based upon a visitation curve versus upon an assumption of 100% use. Snowmobile alternatives should most likely focus on daily caps between 300 and less than 500 if the existing '100%' rules stay in place; if these rules are relaxed somewhat, it may be appropriate to model for up to 700 snowmobile entries - but only if the rules are relaxed (remember

'keep doing the same thing while expecting different results' - it's not going to happen)

**Corr. ID:** 1575

**Organization:** Yellowstone Tour & Travel Summer and Winter

**Comment ID:** 129548

**Organization Type:** Business

**Representative Quote:** Separate and apart, first let me state that any future snowmobile measurement should use 318 as a benchmark from which to compare any viable environmental impact, not zero (0).

Currently, 318 snowmobile entries are allowed park wide in approximately 90 days. I would propose using a seasonal cap and increasing the 318 number to 490 snowmobiles with "flexible daily limits". Please consider allowing snowmobiles to exceed that number by 33% for 20 days with a like decrease of 33% for 20 days and the balance of 50 days to have the base number of 490 per day and a season cap of 44,100. Granted this number is impossible to reach because of the reasons mentioned above but it would provide more flexibility for the public and operators. Even with the low cap of 160 and turning away hundreds of snowmobile visitors this winter there was still a 15% gap between the 160 limit and the top 20 days. A higher cap would allow perhaps a higher differential. See 2009-10 graph. In other words if the top flexible cap were 600 it is not likely that there would be many days over 400 but there could be spikes and valleys. If it is felt that the top flexible use number should be kept under the 540 plan presented in 2007, this number could be adjusted downward slightly.

**Concern ID:** 23613

**CONCERN STATEMENT:** One commenter suggested that OSV caps be flexible and based on air quality. Specifically, OSV use should be lower on inversion days, and higher on non-inversion days.

**Representative Quote(s):**

**Corr. ID:** 1202

**Organization:** Idaho Department of Parks & Recreation

**Comment ID:** 126535

**Organization Type:** Unaffiliated Individual

**Representative Quote:** Air Quality research has shown that air quality impacts or impairment is greatly affected by weather. When winter inversions are occurring, the management plan should allow some flexibility on setting visitation levels. On non-inversion days, winter visitation could be set higher while on inversion days, winter visitation levels could be set lower.

### **AL5090 - Alternatives: Plow Roads**

**Concern ID:** 23614

**CONCERN STATEMENT:** Several commenters stated general support for an alternative that considers plowing all or some of the roads in the park during the winter. Commenters stated that this would provide greater access and a lower cost option to be able to experience the park in the winter. These commenters did not suggested specific areas that should be plowed, or other specific elements related to this alternative.

**Representative Quote(s):**

**Corr. ID:** 243

**Organization:** Not Specified

**Comment ID:** 127189

**Organization Type:** Unaffiliated Individual

**Representative Quote:** I am in favor of opening the public road (plowing the road) for winter park visits using personal vehicles. I think this would create opportunities for more people to visit the park in the winter and enjoy the park in this beautiful setting.

**Corr. ID:** 270                      **Organization:** *Not Specified*

**Comment ID:** 127488            **Organization Type:** Unaffiliated Individual

**Representative Quote:** By plowing open the road to Old Faithful will allow young families and people on fix income enjoy the park.

**Corr. ID:** 301                      **Organization:** *Not Specified*

**Comment ID:** 126343            **Organization Type:** Unaffiliated Individual

**Representative Quote:** I would recommend plowing the main roads in Yellowstone National Park year around. This would allow public access year around.

**Corr. ID:** 344                      **Organization:** *Not Specified*

**Comment ID:** 126595            **Organization Type:** Unaffiliated Individual

**Representative Quote:** I support the plowing the road from West Yellowstone to Old Faithful and Mammoth. Our family likes to XC ski and this would be very convenient for us. We would visit the park more in the winter if this were to happen.

**Corr. ID:** 349                      **Organization:** *Not Specified*

**Comment ID:** 126604            **Organization Type:** Unaffiliated Individual

**Representative Quote:** I would like to advocate for plowing all major roads in Yellowstone for the winter. Currently it is far too expensive to access the park in winter (except for one road) for the common person. This is a national park paid for and protected by the citizens of the U.S., not the wealthy who are able to afford \$100/day to access the park. Plowing the roads will allow for personal vehicles to take enter the park with a family at a very reasonable cost. Park entrance fees and fishing licenses are already high--please keep use fees, whether indirect or direct, down to a minimum. Plowing roads allow everyone to enjoy the park.

**Corr. ID:** 351                      **Organization:** *Not Specified*

**Comment ID:** 126606            **Organization Type:** Unaffiliated Individual

**Representative Quote:** Please consider allowing wheeled motor vehicles in Yellowstone during the winter months. Plowing may be cheaper than the current grooming and provides access affordable to more people. The current requirements involving snow coaches and guided snowmobile trips are expensive and do not allow the visitor to linger over a view or wait for an opportunity to view wildlife. As a skier I would love access to the Old Faithfull area by passenger car in winter to take advantage of the amazing touring opportunities the park offers.

**Corr. ID:** 354                      **Organization:** *Not Specified*

**Comment ID:** 126614            **Organization Type:** Unaffiliated Individual

**Representative Quote:** I do find the snowcoach ride in to be part of the unique experience of an extended weekend stay however increasing access by plowing to those without deep pockets or to locals who would make multiple visits per winter without a \$100+ price tag per trip would be a great addition to our National Park. I do enjoy the current car access between Gardiner and Cooke and trails around Tower however often the snow around Mammoth is not as consistent. Only once have I been able to bring Bozeman friends to ski Lone Star Geyser out of Old Faithful after a freak snowstorm the last weekend in April, the first weekend the roads had opened to cars.

I support plowing of the road between West Yellowstone and Old Faithful and opening this huge trail system (50+ miles? of ski trails in the geyser basin between Madison and Old Faithful) to frequent users and those not willing to spend \$1000 for a weekend trip or \$50-70 per person for a day trip with at best 2.5 hrs of free time to explore the basin or

ski. I recognize that this may not be a popular opinion to the snowmobiling culture of West Yellowstone but if we just provide access by this road, I believe there can still be plenty of opportunities for snowmobiling and other over snow travel between Madison and Mammoth including Norris, Madison and Canyon/Lake, Old Faithful over divide to Lake, etc. While I personally do not enjoy this kind of recreation I believe our national parks should be open for all to recreate as they choose.

**Corr. ID:** 376                      **Organization:** *Not Specified*

**Comment ID:** 126672            **Organization Type:** Unaffiliated Individual

**Representative Quote:** I think that plowing the road to Old Faithful is a great idea for more winter use for more people. Skiers, photographers, wild life enthusiasts, etc could have access where now only few are allowed by limited travel means. I did go into Old Faithful in a snow coach a few years ago and we didn't stop any where to see the wonderful sites in the park. I'm an avid outdoor person and would love this opportunity to see and travel in Yellowstone. I hope this is seriously discussed. Thank you, Kari

**Corr. ID:** 965                      **Organization:** *Not Specified*

**Comment ID:** 128321            **Organization Type:** Unaffiliated Individual

**Representative Quote:** I feel that plowing some of the roads in the Park would best allow for the objectives of the new plan, by "providing opportunities that are universally accessible" rather than only accessible to those who can afford to pay the current price of admission.

**Corr. ID:** 1380                      **Organization:** *Not Specified*

**Comment ID:** 128541            **Organization Type:** Unaffiliated Individual

**Representative Quote:** For this reason I want to see not only the road to Old Faithful plowed, but I also want personal vehicles to be able to use this plowed road throughout the winter season. That is the idea of an annual pass to Yellowstone, to be able to use it for a year, not six months. If I can only use my annual pass for six months, then the Yellowstone National Park Service needs to have a six month pass that people can buy that costs only twenty-five dollars. I mean, what's the point of paying fifty dollars for an annual when you can't use your pass longer than six months out of the year? If the roads aren't going to be plowed so a family can drive in their own car and affordably get into Yellowstone to Old Faithful, then offer a six month pass so everyone can save some money.

**Corr. ID:** 1385                      **Organization:** *Not Specified*

**Comment ID:** 127220            **Organization Type:** Unaffiliated Individual

**Representative Quote:** Education is another great reason to plow. The public would have an excellent chance of being educated about the wildlife, streams, rivers, and winter elements in general, if they were able to access their park. This kind of education could help in efforts to promote conservation. Keeping people out does nothing for that education.

**Corr. ID:** 1503                      **Organization:** *Not Specified*

**Comment ID:** 128451            **Organization Type:** Unaffiliated Individual

**Representative Quote:** YOU ASKED: What park resources and values do you believe are most important and which of these should guide development of the winter use plan for Yellowstone? Why are they important?

I value that the park is for "the benefit and enjoyment of the people." The geyser basins are not to be found anywhere else on earth. It is time to bring Yellowstone into the 21st century. There is no reason not to allow wheeled vehicles into the park in winter. Plowing will show to be less costly than grooming, with allowing public access to Old

Faithful and the geyser basin to people from all walks of life. People will come, and if numbers have to be limited in winter to protect resources, the Park Service has a history with other parks of limiting numbers if necessary.

Wheeled vehicle access would be much cleaner than snowmobiles or snowcoaches. And there would be more than the 330 people per day that currently enter through the West Gate. The park has built a great new resource in the Visitor Center at Old Faithful, and how nice if it could be teeming with people learning about Yellowstone instead of remaining empty except for a handful of tourists.

Yellowstone is a treasure, and allowing more people to see it in winter is now possible by changing from Oversnow to wheeled vehicle use. It is important as it will offer families a wonderful vacation, in these hard economic times. Regional visitors that have cherished the park in spring, summer, and fall, would now be able to access Yellowstone in the winter time. Many people feel shut out now in winter.

**Corr. ID:** 1549                      **Organization:** *Not Specified*

**Comment ID:** 129087            **Organization Type:** Unaffiliated Individual

**Representative Quote:** I also think the roads should be plowed to allow auto access into Old Faithful. This would enable children and handicapped people the opportunity to see the winter beauty. Also, may senior citizens could only go by auto.

**Concern ID:** 23615

**CONCERN STATEMENT:** Commenters stated that while they supported plowing the roads in Yellowstone during the winter, they did not think Dunraven Pass and Sylvan Pass should be plowed, due to safety reasons.

**Representative Quote(s):** **Corr. ID:** 296                      **Organization:** *Not Specified*

**Comment ID:** 127621            **Organization Type:** Unaffiliated Individual

**Representative Quote:** I believe all roads in the park should be plowed during the winter with the exception of Dunraven Pass (Tower Junction to Canyon Village) and Sylvan Pass (East Entrance to Lake Village). This action would increase public access to Yellowstone during the wonderful winter season. I believe plowing would be cheaper than the current model of grooming roads for over snow travel followed by spring plowing. I believe park resources would be adequately protected with roads plowed.

**Corr. ID:** 296                      **Organization:** *Not Specified*

**Comment ID:** 127622            **Organization Type:** Unaffiliated Individual

**Representative Quote:** I believe the plowing of Dunraven and Sylvan Passes is unreasonable because of the risks associated with the roads passing through active avalanche areas.

**Concern ID:** 23617

**CONCERN STATEMENT:** Several commenters suggested that specifically, the west side of the park should be plowed. Many of these stated that West Yellowstone to Old Faithful or Mammoth to Old Faithful should be the subject of plowing efforts.

**Representative Quote(s):** **Corr. ID:** 240                      **Organization:** Yellowstone Historical Center

**Comment ID:** 127325            **Organization Type:** Unaffiliated Individual

**Representative Quote:** It has been my belief for a very long time that the road between West Yellowstone and Old Faithful should be plowed in the Winter to allow access to



the general public, regardless of their economic status.

The cost of plowing versus the cost of oversnow grooming are dramatically different, with plowing being far less costly, like only one third as much for both the equipment and operation.

The economic benefit to the Park from entry and concession fees collected would undoubtedly not only offset any operating costs but would provide substantial reserves never before obtained during the Winter period.

**Corr. ID:** 241                      **Organization:** *Not Specified*

**Comment ID:** 127191            **Organization Type:** Unaffiliated Individual

**Representative Quote:** I would be in favor of plowing the road from West Yellowstone to Old Faithful so that I would be given the same rights to enter and enjoy the park in my own vehicle during the winter as I have in the summer months.

**Corr. ID:** 284                      **Organization:** Morning Glory Coffee & Tea, Inc.

**Comment ID:** 127642            **Organization Type:** Unaffiliated Individual

**Representative Quote:** In order to create economically and environmentally sustainable communities on the border of Yellowstone National Park, The Department of Interior and the National Park Service should consider and study the feasibility of plowing the interior roads from West Yellowstone to Old Faithful and possibly Madison Junction to Mammoth Hot Springs for the following reasons.

1. Better more affordable and more consistent access for visitors.
2. More efficient year round operations (without the expense of opening and closing all facilities.
- 3 Better access (year round) for NPS and concessions to maintain and service facilities.
- 4.Easier Emergency access (year round)
5. Better access for recycling in the region (helping the NPS and other organizations to meet environmental goals throughout the region (year round)
6. Better access (year round) for animal and environmental research.
7. More consistent and sustainable economies for border communities that the NPS and other organizations count on for services.

**Corr. ID:** 335                      **Organization:** *Not Specified*

**Comment ID:** 126572            **Organization Type:** Unaffiliated Individual

**Representative Quote:** Numbers aside, most of us acknowledge that things are never going to get back to the way they were before the snowmobile restrictions. We understand and agree that protecting the resources of the Park is the top priority. The current winter use plan, as well as the last couple of plans, are driven by political pressure. They are mere attempts to balance the interests of the snowmobile/snowcoach industry and the environmental activists.

I suggest and support a solution. Plow the road from West Yellowstone to Old Faithful. Allow people to drive their own private vehicles into the Park in the winter. Fill the hotel rooms and restaurants in West Yellowstone as well as at Old Faithful. Everyone will benefit if more people can access the Park affordably, instead of a select few. Snowmobiling will still thrive outside the Park because there will be more people in the area. Consider guided snowmobile tours that originate at Old Faithful. An avid cross country skier remarked to me recently that plowing the road to Old Faithful could quite possibly be the single biggest thing that could ever happen to cross-country skiing. If skiers could actually drive themselves to Old Faithful, trail options would increase exponentially and skiers would come from all over the country. Families could afford to see winter in Yellowstone from the comfort of their cars. Emissions would be far less

than from inefficient snowcoaches or crowded summer traffic.

**Corr. ID:** 346

**Organization:** *Not Specified*

**Comment ID:** 126601

**Organization Type:** Unaffiliated Individual

**Representative Quote:** I am writing to STRONGLY encourage you to start plowing the road from Mammoth to West and Old Faithful to allow much greater winter use opportunities, with much less noise and pollution vs. snowmobiles. The ability to ski and snowshoe and see the park would be phenomenal!

**Corr. ID:** 348

**Organization:** *Not Specified*

**Comment ID:** 126603

**Organization Type:** Unaffiliated Individual

**Representative Quote:** I strongly support plowing the road between Mammoth and West Yellowstone. My family has wanted to take the snow coaches for years but we have never been able to afford it. Plowing this route would vastly increase the number of users who could enjoy the park in winter. This would create fantastic nordic skiing and snowshoeing opportunities that my family would probably take advantage of several times a season. Currently we typically do one trip per season to ski from the road between Mammoth and Cooke City. I suspect the economic benefits to Gardiner and West Yellowstone would be very significant. Thank you for your consideration. Even if you ran buses instead of fully opening the road to personal vehicle traffic, that would be great - and the more I think about it may be preferable on a number of levels. I'm sure buses would be much cheaper than snow coaches.

**Corr. ID:** 350

**Organization:** *Not Specified*

**Comment ID:** 126605

**Organization Type:** Unaffiliated Individual

**Representative Quote:** Please plow the park from West Yellowstone to Old Faithful and then let the 4 stroke snowmobiles have use of the rest of the park.

After living in West Yellowstone for 5 years, 1996-2001, I feel that the rest of the world should be able to see the beauty of Yellowstone Park (my park) in the winter.

I have heard from many residents that the winter economy is down by 50% or more since I left.

I know in the beginning of the park, in the early 1900's, it was the wealthy that could afford to take a train, then stagecoach, then stay at the fancy hotels in the park.

But it is now unfair to the rest of the world to have the park in the winter only available to the wealthy. It costs a lot to rent a snowmobile and hire a guide.

Please plow the park from West Yellowstone to Old Faithful and then let the 4 stroke snowmobiles have use of the rest of the park.

If the north end passage to Cooke City is open, why can't the west entrance be the same?

My only worry to opening the road to Old Faithful, would be:

- 1) Where would you put the snow?
- 2) Make sure it doesn't effect the animals of the park. How would the bison and the elk and other animals get over the snow hill (berrens?)

Thank you for reading this. I LOVE YELLOWSTONE PARK! IT IS MY HOME IF I COULD AFFORD TO LIVE IN WEST!

**Corr. ID:** 365

**Organization:** *Not Specified*

**Comment ID:** 126642      **Organization Type:** Unaffiliated Individual

**Representative Quote:** I wish to voice strong support for an option which allows wheeled vehicle access in YNP during the winter. I would like the NPS to include plowing the roads in Yellowstone during the winter as one of the alternatives reviewed during the scoping process. I support plowing the roads during the winter to allow greater public access, to all, of this national treasure. The currently available options of limited snowmobile access or hired snowcoach with a guide are not economically feasible for a great swath of the people (local and visiting). I envision that the plowed road segments would be Mammoth to Madison Junction (allowing access to the Norris Geyser basin), continue on to Old Faithful, and out to the Western entrance at West Yellowstone. This would bring positive economic vitality to the region.

**Corr. ID:** 373      **Organization:** *Not Specified*

**Comment ID:** 126665      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Let's plow the road between West Yellowstone and Old Faithful to make the west side of the park available to everyone, not just the wealthy.

Thank you for listening,

**Corr. ID:** 437      **Organization:** *Not Specified*

**Comment ID:** 129465      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Dear NPS Officials,

I understand it has been proposed to expand winter plowing of the roads in Yellowstone National Park to include Mammoth to Madison Junction, Madison Junction to West Entrance (and West Yellowstone), and Madison Junction to Old Faithful. I would assume this includes plowing of adjacent parking areas at Norris Geyser Basin, the Fountain Paint Pots, Midway Geyser Basin, Biscuit & Black Sand Basins & the Old Faithful parking lots as well.

I fully support this idea as it would allow the general public easier access to Yellowstone's most famous thermal areas. The current plan only allows access to people who are rich enough to afford the cost of visiting Yellowstone during the winter months. It also costs much less to plow the roads than it does to groom them (according to data I have seen at [plowyellowstone.org](http://plowyellowstone.org)), and those monies could be used elsewhere in Yellowstone & the rest of the National Park system. It would increase appreciation & understanding of the world's first National Park & the largest concentration of geysers on earth. Increased visitation would increase revenue for Yellowstone itself, the various concessionaires in the park, and for the gateway communities of West Yellowstone, Gardiner & Cooke City. Plowing the roads would greatly reduce the noise & pollution of over-snow transports in the park; a subject which has garnered much attention in recent years.

**Corr. ID:** 439      **Organization:** *Not Specified*

**Comment ID:** 129203      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Plowing the West Entrance Road to Madison Jct., as well as plowing the Grand Loop Road from Mammoth to Old Faithful seems a logical answer. Over snow opportunity could then still exist from Norris Jct., to the South Ent. via the lower loop route to Canyon - Lake, etc. It is important to note, affordable access would mean driving a personal vehicle to visit Yellowstone.

**Corr. ID:** 836      **Organization:** *Not Specified*

**Comment ID:** 127392      **Organization Type:** Unaffiliated Individual

**Representative Quote:** I am in favor of plowing the West Entrance road to Old Faithful for private wheeled vehicles. As one who loves to cross country ski and snowshoe and who lives on a fixed income (teacher's retirement) this would make it affordable for me to enjoy the wonders of Yellowstone in winter.

**Corr. ID:** 851                      **Organization:** *Not Specified*

**Comment ID:** 127458            **Organization Type:** Unaffiliated Individual

**Representative Quote:** I support plowing the interior Park roads from West Yellowstone to Old Faithful and Mammoth, and to strongly support keeping the Park open and ACCESSIBLE to all, 365 days a year, to both personal and commercial wheeled vehicles (cars, buses, tour operators, RV's etc).

**Corr. ID:** 893                      **Organization:** *Not Specified*

**Comment ID:** 126280            **Organization Type:** Unaffiliated Individual

**Representative Quote:** I would like to suggest that we all get a little more serious in thinking about and talking about the future of plowing some more of the Park roads in the winter. At the very least, I would hope that the plowing solution would be included in the choice of alternatives and, hopefully, the preferred alternative.

Both Suzanne and John have shared at public meetings that they didn't want to get into the plowing business and I can appreciate their stance. I don't like plowing my own driveway but, if I wish for visitors to come and visit, I don't have much choice. Regardless, plowing from West to Old Faithful and probably from Madison to Mammoth would create a situation, I think, that would greatly increase the probability of more folks visiting the Park and more visitors staying with us in West, and with your "in Park" concessioners, on a nightly basis. In addition, I believe that this will only work if these winter visitors are allowed to drive their own personal vehicles and not be forced back into commercial transportation as they are now.

**Corr. ID:** 1213                      **Organization:** *Not Specified*

**Comment ID:** 129032            **Organization Type:** Unaffiliated Individual

**Representative Quote:** Plowing the West Side Roads: There seems to be a growing amount of interest in plowing the west side roads (West Yellowstone to Old Faithful, as well as Old Faithful to Mammoth) to provide wheeled vehicle access versus over-snow access on these roads. Because of this growing interest, I believe it is necessary that an alternative fairly and properly consider this concept - otherwise it would seem this process could be open for a legal challenge on yet one more issue.

**Corr. ID:** 1214                      **Organization:** *Not Specified*

**Comment ID:** 129584            **Organization Type:** Unaffiliated Individual

**Representative Quote:** Plowing the West Side Roads: There seems to be a growing amount of interest in plowing the west side roads (West Yellowstone to Old Faithful, as well as Old Faithful to Mammoth) to provide wheeled vehicle access versus over-snow access on these roads. Because of this growing interest, I believe it is necessary that an alternative fairly and properly consider this concept - otherwise it would seem this process could be open for a legal challenge on yet one more issue.

It has been interesting to watch this renewed discussion unfold. Advocates for plowing the road cite the loss of affordable access and the loss of access by local residents - and argue that winter access by personal automobiles (not by commercial buses and vans) could help address fixing this issue. They're right, but only if private automobiles are allowed access. They also argue that road plowing is less expensive than road grooming. Again, I'd probably have to agree.

**Corr. ID:** 1377

**Organization:** *Not Specified*

**Comment ID:** 127209

**Organization Type:** Unaffiliated Individual

**Representative Quote:** I am in favor of plowing the road from West Yellowstone, Montana into Yellowstone National Park to Old Faithful.

\*Over the road travel by auto is already an accepted means of conveyance.

\*It removes the issue of pollution and noise concerns from snowmobiles by plowing for cars.

\*Travel by car allows for affordable access year-around.

\*Services available to visitors in the summer months become strained and limited if winter access is continued to be impeded. We have seen how the winter access issue has affected business in West Yellowstone very negatively. The lack of year-around visitation affects the West Yellowstone tax base.

**Corr. ID:** 1458

**Organization:** West Yellowstone Economic Development Inc.

**Comment ID:** 128903

**Organization Type:** Unaffiliated Individual

**Representative Quote:** We do not favor one option over another. We want to support solutions that lead to better access, which ideally result in an economically sustainable 60,000 visitors going through the West Gate during the winter season, and also lead to a healthy outcome for the Park. In no particular order, these options could include one of or a mixture of the following:

- Establish a daily quota for snowmobiles and snow coaches that balance visitor access, resource protection, and sustainable economic opportunity for the gate communities.

- Incorporate a flexible use policy to this daily quota in which the total number of snowmobiles can exceed the threshold on certain days and must be under the threshold on other days.

- A non over-the-snow option is to plow the road from West Yellowstone to Old Faithful with some options for over the snow activities such as skiing and snow-shoeing along the route from West Yellowstone to Old Faithful.

- If the road from West Yellowstone to Old Faithful is plowed, consider allowing some regulated BAT snowmobile access from Madison Junction to Canyon or from Old Faithful to Yellowstone Lake or other destinations. We would be willing to work with Park concessionaires to develop an operation's strategy that would be fair to all.

- If the road from West Yellowstone to Old Faithful is plowed, consider allowing only commercial buses with limited stops for skiing along the route. Private car travel would be phased in over time.

**Corr. ID:** 1482

**Organization:** *Not Specified*

**Comment ID:** 128746

**Organization Type:** Unaffiliated Individual

**Representative Quote:** What are some potential options for managing motorized winter use at Yellowstone?

I am in favor of plowing the road between West Yellowstone and Mammoth to provide wheeled vehicle to the western part of the Park with the possible addition of a plowed road from Norris to Canyon and Madison Junction to Old Faithful. It doesn't seem reasonable to plow the high passes in the Park (including the East entrance). I suspect the

environmental impact from plowing is much less than grooming for over snow vehicles and that winter use would sharply increase by the general public when a winter loop from Bozeman to West Yellowstone to Mammoth to Livingston was established. Furthermore, having spent some time in Cooke City recently, I am aware of the Park's influence on winter use in that community. I believe many local residents would support plowing the 10 miles of road east of Cooke City to existing plowed roads in Sunlight Basin opening up wheeled vehicle loop opportunities into the Billings-Cody corridor.

Overall, it seems that the historical reliance on snowmobiles as transportation does not match with the 21st century reality of winter use in Yellowstone. The environmental impact of snowmobiles and snowcoaches will always be worse than wheeled vehicles due to friction plus wheeled vehicles are currently undergoing a technology revolution as evidenced by the new hybrid and upcoming electric automobiles. The cleanest forms of transportation are getting cleaner and greener.

**Corr. ID:** 1503

**Organization:** *Not Specified*

**Comment ID:** 128457

**Organization Type:** Unaffiliated Individual

**Representative Quote:** YOU ASKED: What other issues, concerns, or suggestions do you think should be considered as we develop the new long term Winter Use Plan/EIS?

I know this is a scoping for WINTER USE, yet as far as other issues, the park could remain open 12 months a year if the roads were plowed. There would be no season for building up snow or having to plow it off from winter over snow use. Living at the West Entrance, sometimes November is a nicer month than October, and March and early April have some very lovely days. I will hope that the EIS leads to year round use from the West Entrance like what is now offered at the North Entrance.

My greatest concern is the selfishness of local business people in West Yellowstone that currently profit from the way things are now, though they would love to see more snowmobiles allowed. They talk like our local economy depends on sustaining the status quo, when plowing the roads and allowing more people to enter would do much more for the economy of West Yellowstone than a hundred more snowmobiles a day. They have monopolies now, it is their way, or no way, and they do not want to see that change. I know that the effect of winter use on gateway communities does not figure very much into the NPS plan, yet I wish the selfish concessionaires would want what is best for Yellowstone, not for them.

**Corr. ID:** 1559

**Organization:** Wyoming State Snowmobile Association

**Comment ID:** 129354

**Organization Type:** Recreational Groups

**Representative Quote:** Make no mistake about it - our first choice would be for the Park to relax its onerous rules regarding 100% BAT snowmobiles and 100% commercially guided access to make snowmobile access park-wide more affordable and more viable. BUT if that is not going to happen, particularly on the west side, then maybe, just maybe, it makes a whole lot of sense to consider plowing that portion of the Park to help reestablish individual public access that is affordable as well as available to local residents through private automobile access. And from our perspective, reestablishing affordable access for individuals should be one of the most important objectives of this process.

IF the west side roads are plowed to help provide a measure of individual access, then we believe rules governing over-snow access from the south and east entrances (where snow depth is much greater and the potential for road plowing not very realistic) should also be revisited to help provide a measure of non-commercial access. Since, historically, the vast majority of documented snowmobile issues and conflicts occurred on the west side

of the Park, it would seem appropriate to consider relaxing current rules for snowmobile use on the east side (east entrance to Lake, Canyon to West Thumb, and south entrance to Old Faithful) if a road plowing scenario is pursued. If you look back to when this long-running round of winter use planning started in 1997, it is well documented that conflicts with snowmobiles between West Yellowstone and Old Faithful drove changes in policy that unfortunately affected the whole Park - but were overkill in respect to east side snowmobile issues. And if you remove issues caused by unguided rental sleds originating from Flagg Ranch (pre-2004 rules), documents east side snowmobile conflicts are next to nil. The bottom line is that if snowmobiles are removed from the west side of the Park, snowmobile policies for the east side should be given a fresh look regarding having to be 100% BAT and 100% commercially guided. Our suggestion is that a mix of Certified Leaders (a concept which we've already outlined above) and EPA Compliant Snowmobiles (outlined below) could help successfully achieve this.

**Concern ID:** 23619

**CONCERN STATEMENT:** Commenters stated that plowing the roads would be a less expensive option for the NPS than the current system of road grooming for OSV use. They further stated that the NPS plowing operations in the Lamar Valley to Cooke City show this is a viable option.

**Representative Quote(s):** **Corr. ID:** 104 **Organization:** *Not Specified*

**Comment ID:** 126909 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Plowing would be cheaper than the grooming operation now. This would also save the spring plowing budget for every segment of road that is plowed in the winter.

**Corr. ID:** 123 **Organization:** GOSA

**Comment ID:** 127513 **Organization Type:** Unaffiliated Individual

**Representative Quote:** The cost of plowing may offset the cost of grooming while eliminating entirely the more difficult task and cost of removing ~30 miles of compacted, groomed snow prior to opening in the spring. Plowed roads would allow better employee travel as well as more cost effective access for non-life threatening emergencies.

**Corr. ID:** 335 **Organization:** *Not Specified*

**Comment ID:** 126574 **Organization Type:** Unaffiliated Individual

**Representative Quote:** I have heard arguments that plowing would be too expensive or too difficult, but they simply do not make sense. Under current conditions, the road to Old Faithful has to be groomed every night. Substantial efforts are made to actually keep snow on the road to artificially provide for over-snow travel. Plowing would only be necessary after heavy snowfalls. Road conditions would be exactly the same as the conditions people travel through just to get to West Yellowstone, as well as being almost identical to road conditions between the North Entrance at Gardiner to Cooke City. This corridor is currently plowed and has been for many years with no significant issues.

Thank you for the opportunity to voice my opinion. I hope serious consideration will be given to this option. The proposed alternatives do not benefit our community, our economy, or the environment. It is time to do something rational and benefit a wider range of people.

**Corr. ID:** 417 **Organization:** *Not Specified*

**Comment ID:** 129209 **Organization Type:** Unaffiliated Individual

**Representative Quote:** I believe the time has come to open up the park to the public through plowing some of the roads in the park. I am an avid cross country skier who would like to be able to ski in the park but can not afford the fees to use a snow coach to

go into the park. I believe the winter park has become an elitist place to visit because of the cost and the NPS continues to support these people. The cost of keeping the roads open would be substantially less than the grooming provided. When I read the park papers it is pointed out that the number of people using the park in the winter is only a small fraction of those in the summer, but it is kept this way by the NPS. There are other parks who keep the roads open such as Yosemite and MT Rainier and they do not have problems. Right now the trails are groomed costing millions so that about 500 snowmobiles and 75 snow coaches can use it a day. That is possibly 1500 people a day getting the millions spent on grooming.

**Corr. ID:** 425

**Organization:** *Not Specified*

**Comment ID:** 129210

**Organization Type:** Unaffiliated Individual

**Representative Quote:** Groomers today cost over \$300,000 to purchase and are over \$100 per hour to operate. They only travel at 8 miles per hour. This makes the average cost per mile to groom a oversnow road \$12. A plow truck costs \$100,000 and operate at about 30 miles per hour. That makes the average cost per mile to plow the road \$2. The equalizer is you may have to plow a road four or five times during a snow storm. The real savings come because it only snows on the average of once every three days in Yellowstone, whereas with grooming you have to groom every single day.

Plowing the roads would accomplish many things. The first and most important being public access for all, similar to the method presently employed from mid April to November 1st in Yellowstone. People would be allowed into Yellowstone in their own vehicles. (Any vehicle that can make it to West Yellowstone from either Idaho Falls, ID or Bozeman, MT could make the trip from West to Old Faithful.) You could use your National Park Pass, or get a 7 day weekly pass for \$25. The only other cost would be fueling the vehicle and whatever other amenities one plans to purchase in Yellowstone.

Over snow travel is an expensive adventure. It currently costs \$100 per day or more to access Yellowstone via snowcoach or snowmobile. Guide fees cost extra, tips cost extra, your pass costs extra. It adds up to a trip for the privileged only, those with means to spend \$400 on a family of four for one day in Yellowstone. This is elitist, and is not what Yellowstone was set aside to be.

**Corr. ID:** 1214

**Organization:** *Not Specified*

**Comment ID:** 129585

**Organization Type:** Unaffiliated Individual

**Representative Quote:** Opponents of plowing these roads cite the difficulty of keeping the roads open in adverse weather conditions - but are these roads really any more difficult to maintain in winter conditions than the road already being plowed through Lamar Valley or the state highways leading to the various gates? I think not. And if conditions are too bad, we're all used to road closures until winter driving conditions improve - so road closures in the Park wouldn't be any different or a new thing since the Park already institutes winter closures to over-snow vehicles. Conservation groups argue that "unfettered access for autos is not compatible with the best interests of the animals" in some parts of the Park. Really - why would it be any different than the Lamar Valley which is a winter wildlife haven even with the road plowed? They also state that road plowing would create a snow berm that would prevent animal movements. But the way the Park grooms its snow roads already creates a snow berm alongside roads that animals seem to negotiate - plus there are snow plowing techniques that can minimize the height of a snow berm. Yet other groups argue that plowing the roads would destroy the snowmobile industry on the west side of the Park. But my observation is that the snowmobile industry has already been gutted - back in 2004 when the '100% BAT and commercially guided' rules were instituted - and is simply dying a slow death.

Make no mistake about it - my first choice would be for the Park to relax its onerous rules regarding 100% BAT snowmobiles and 100% commercially guided access to make



snowmobile access park-wide more affordable and more viable. BUT if that is not going to happen, particularly on the west side, then maybe - just maybe - it makes a whole lot of sense to consider plowing that portion of the Park to help reestablish individual public access that is affordable as well as available to local residents through private automobile access. And from my perspective, reestablishing affordable access for individuals should be one of the most important objectives of this process.

**Corr. ID:** 1516

**Organization:** Oregon State Snowmobile Association

**Comment ID:** 128366

**Organization Type:** Unaffiliated Individual

**Representative Quote:** Opponents of plowing these roads cite the difficulty of keeping the roads open in adverse weather conditions - but are these roads really any more difficult to maintain in winter conditions than the road already being plowed through Lamar Valley or the state highways leading to the various gates? We think not. And if conditions are too bad, we're all used to road closures until winter driving conditions improve - so road closures in the Park wouldn't be any different or a new thing since the Park already institutes winter closures to over-snow vehicles. Conservation groups argue that "unfettered access for autos is not compatible with the best interests of the animals" in some parts of the Park. Really - why would it be any different than the Lamar Valley which is a winter wildlife haven even with the road plowed? They also state that road plowing would create a snow berm that would prevent animal movements. But the way the Park grooms its snow roads already creates a snow berm alongside roads that animals seem to negotiate - plus there are snow plowing techniques that can minimize the height of a snow berm. Yet other groups argue that plowing the roads would destroy the snowmobile industry on the west side of the Park. But our observation is that the snowmobile industry has already been gutted - back in 2004 when the '100% BAT and commercially guided' rules were instituted - and is simply dying a slow death.

Make no mistake about it - our first choice would be for the Park to relax its onerous rules regarding 100% BAT snowmobiles and 100% commercially guided access to make snowmobile access park-wide more affordable and more viable. BUT if that is not going to happen, particularly on the west side, then maybe - just maybe - it makes a whole lot of sense to consider plowing that portion of the Park to help reestablish individual public access that is affordable as well as available to local residents through private automobile access. And from our perspective, reestablishing affordable access for individuals should be one of the most important objectives of this process.

**Corr. ID:** 1578

**Organization:** *Not Specified*

**Comment ID:** 129879

**Organization Type:** Unaffiliated Individual

**Representative Quote:** Cost of grooming vs. plowing needs to be analyzed. The NPS can look to Grand Teton, the road to Cooke City, and other governmental agencies in the region for cost per mile to plow. The cost of grooming should already be established. The capital cost of grooming equipment should also be added; this is expensive, short lived, slow moving specialized equipment in comparison to plow trucks. The emissions and fuel use of grooming equipment should also be analyzed as engines in this equipment do not need to meet 'on road EPA standards"; they are Off-Highway engines. Frequency of plowing vs. grooming needs to be analyzed. Grooming is required every night of the oversnow season. Plowing is required every three days on average at the most.

Spring "break out" plowing costs need to be added to the winter grooming costs for a true picture of how much oversnow road maintenance costs. If the roads are plowed there are no "break out" costs. The cost of hauling, spreading, and removal of wood chips on warm road sections needs to be added to the cost of Oversnow vehicle operations. This cost would not be required if plowing were the alternative. Also, when a road is plowed throughout the winter, the snow is dispersed along the sides of the roadway and there are almost no berms in the spring. Break out plowing piles large and irregular berms on the

sides of the road which are a great impediment to wildlife at a time when they are weakest.

**Concern ID:** 23620

**CONCERN STATEMENT:** Commenters stated opposition to the concept of plowing the roads in Yellowstone in the winter. Reasons for concern included impacting the visitor experience, impacts to wildlife, and allowing the park the time to "recover" in the winter.

**Representative Quote(s):** **Corr. ID:** 297 **Organization:** *Not Specified*

**Comment ID:** 127625 **Organization Type:** Unaffiliated Individual

**Representative Quote:** The roads should remain un-plowed to enable animals time to recover and give them every opportunity to survive through the harshness of winter.

Plowing the roads will serious effect the wilderness and the wild animals that people love in Yellowstone. DON'T DO IT!

**Corr. ID:** 884 **Organization:** *Not Specified*

**Comment ID:** 127591 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Frankly, opening up the entire park to highway passenger vehicles would cheapen the special nature of being in the Park in the winter. It is bad enough to hear snowmobiles on Park Roads when skiing near places like the Madison River.

**Corr. ID:** 909 **Organization:** *Not Specified*

**Comment ID:** 127335 **Organization Type:** Unaffiliated Individual

**Representative Quote:** I am against plowing for wheel vehicles all winter. The cost would be too much and I am not sure it would be to anyones advantage.

**Corr. ID:** 911 **Organization:** West Yellowstone Snowmobile and Snowcoach Operators

**Comment ID:** 127924 **Organization Type:** Business

**Representative Quote:** We do not support Plowing the Roads

**Corr. ID:** 1230 **Organization:** *Not Specified*

**Comment ID:** 126523 **Organization Type:** Unaffiliated Individual

**Representative Quote:** I am not in favor of plowing the road in the park. I enjoy taking my family and friends to West Yellowstone for the purpose of snowmobiling in the park.

**Corr. ID:** 1497 **Organization:** *Not Specified*

**Comment ID:** 128503 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Plowing the roads is a bad idea. There is a certain mystique to being in Yellowstone in the winter time that cannot be replicated elsewhere. Being in a place that you cannot drive a car to is in itself an experience many people throughout the world have never had and that is becoming more and more difficult to find. Once you build a bridge to an island it is changed forever. Nepal's Annapurna Circuit is world renowned for its famous trekking through remote mountains and villages not accessible by vehicle. People from around the globe are clamoring to do this trek now because the Nepali government is building a road to these remote areas and it will be changed forever. They are loosing the hook that has attracted thousands of trekkers for decades. It may make life easier and more convenient for the local residents but this civilized progress is not necessarily the best ecologically for the region. If the road in Yellowstone

is plowed, we will lose forever the experience of remote winter Yellowstone that is truly unique in the world setting and is distinct from other times of year.

**Corr. ID:** 1560

**Organization:** *Not Specified*

**Comment ID:** 129256

**Organization Type:** Unaffiliated Individual

**Representative Quote:** 5. Plowing is not an option. It will decrease the visitor experience. Plowing takes away the adventure that is offered historically. There have been no studies to show that visitors will come if the roads are open to commercial travel. The numbers from the North gate are unrealistic when used to compare what might happen at the West gate. The North gate numbers include visitors snowmobiling at Cooke City and visitors using Mammoth as a staging area to snowmobile or snowcoach the rest of Yellowstone. These are not numbers that would travel through West Yellowstone to Old Faithful if the road were plowed. If you count these numbers as a statistic you should put a counter between West Yellowstone and Big Sky and use those numbers as a reason for plowing from West Yellowstone to Old Faithful. I should also mention the increased damage to the road system and surrounding environment. When you plow these roads and they are not insulated by a snow pack the forest will go deeper and in the spring have nowhere to go except for through the pavement. They will also need to be sanded for vehicle safety and that material will end up on the sides of the roads and kill vegetation.

**Corr. ID:** 1586

**Organization:** *Not Specified*

**Comment ID:** 129594

**Organization Type:** Business

**Representative Quote:** We are adamant about the fact that we should not even be considering plowing as an option as it would have adverse effects on the park. Not to mention the cost factor that plowing would entail! The pristine winter experience would be ruined as the snow would be piled so high that the visitor would not have the scenery that could be enjoyed via snowmobile or snow coach. We feel that plowing the roads would also effect the migration of bison; it would corridor them into West Yellowstone and Montana where cattlemen have opposed the migration of bison out of the park.

**Corr. ID:** 1588

**Organization:** State of Wyoming- Department of State Parks and Cultural Resources

**Comment ID:** 129634

**Organization Type:** State Government

**Representative Quote:** A proposal to plow a large portion of Yellowstone's interior roadways would also be counterproductive and detrimental to effective management of the vast park interior. This would eliminate touring the Grand Loop in one vehicle type in one day's time (since rubber tracked-equipped vans are too slow), which would substantively detract from the winter visitor's desired experience. Furthermore, it would make both visitor and administrative travel within the park a virtual nightmare - requiring a minimum of two vehicle switches/transfers to complete a single trip around the Grand Loop or even to visit single locations on the north, east, and south sides of the Loop if the trip originates in either the Mammoth or West Yellowstone areas. This would require visitors to rent both a van and a snowmobile or snow coach to complete a single interior loop trip - certainly not a visitor friendly way to experience a national park. It would also require park staff, as well as employees' families who live within the interior, to have two vehicle types available for their transportation needs within the park - certainly a pointless and unwarranted additional expense for both families and the government. Additionally, NPS would have to invest in a "hub and spoke" infrastructure, which airlines have tried to improve for many years, given the weather conditions during the winter - does anybody really want to wait for the next flight shuttle?

**Concern ID:** 23621

**CONCERN STATEMENT:** One commenter requested that the plan/EIS evaluate the cost of visitation on OSV vs. plowed roads.

**Representative Quote(s):** **Corr. ID:** 191 **Organization:** *Not Specified*

**Comment ID:** 129483 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Past EISs have also disregarded the effects of snowcoach- and snowmobile restrictions on visitor pocketbooks. It is clear that Yellowstone in winter is the province of the rich, or at least comfortably middle class. The EIS needs to provide readers with the estimated costs of one-day and overnight trips to Old Faithful, from West Yellowstone, for a party of two (sharing the hotel room on the overnight example). In this way, readers will see just how expensive visiting the park in winter is-- particularly how expensive snowcoaches are and how inexpensive buses on plowed roads would be.

**Concern ID:** 23622

**CONCERN STATEMENT:** One commenter suggested that the NPS has the opportunity to form a supportive coalition for plowing the roads, which would help the success of this alternative.

**Representative Quote(s):** **Corr. ID:** 191 **Organization:** *Not Specified*

**Comment ID:** 129486 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Lastly, the NPS needs to consider the insights offered by political scientist William R. Lowry in his book *Repairing Paradise* (2009: The Brookings Institution Press), particularly as regards forming effective and supportive coalitions with members of the public. Using four high-profile NPS controversies as case studies (including wolf reintroduction in Yellowstone), Lowry persuasively argues that only when NPS forms such a coalition is it likely to succeed in a policy-making endeavor. NPS has an excellent opportunity to form a supportive coalition to plow its winter roads (restricting them in winter to public bus & van travel) with the Yellowstone Business Partnership. Not only does this group support plowing the park's west-side roads, but so do key individuals in West Yellowstone and Bozeman, Montana. NPS has a rare opportunity, if it sagely forms a pro-plowing/public transportation coalition with these groups and individuals, to finally get out from the snowcoach/snowmobile dichotomy that environmentalist and snowmobile advocates have turned the winter use debate into. In this way, NPS could embrace a truly visionary approach to Yellowstone's future.

**Concern ID:** 23623

**CONCERN STATEMENT:** Commenters suggested specific requirements they felt would be necessary if wheeled vehicles were permitted in the park. These suggestions include:

- Mandatory chains
- speed limit reductions
- placing a limit on the number of private cars permitting in the park each day
- implement road closures when conditions are too hazardous
- a requirement for four wheel drive vehicles
- implementing night time closures

**Representative Quote(s):** **Corr. ID:** 231 **Organization:** *Not Specified*

**Comment ID:** 126720 **Organization Type:** Unaffiliated Individual

**Representative Quote:** I would like the EIS to address the option of plowing the road from West Yellowstone to Old Faithful and to Mammoth. This should be open to

personal vehicles, although may be subject to safety concerns, ie: winter tires, 4 wheel drive, etc. Then the option to go to Canyon, and the South and East Entrances by snowmobile or Snowcoach.

**Corr. ID:** 439                      **Organization:** *Not Specified*

**Comment ID:** 129204            **Organization Type:** Unaffiliated Individual

**Representative Quote:** Plowing would be more cost efficient for Yellowstone. Yellowstone's 4 stroke snowmobile fleet would be dramatically reduced. Grooming equipment cut by at least 50%. Equipment needed for plowing already exists. Night time closures (which are already in place), should remain, allowing for snow plow operations if needed, as well as mitigating vehicle vs. wildlife accidents. In fact, bumping the 9:00 p.m. closure up to 7:00 p.m. would probably be wise. At no time, during our current winter season, is it daylight beyond 7:00 p.m.

**Corr. ID:** 764                      **Organization:** Geyser Observation and Study Association

**Comment ID:** 127090            **Organization Type:** Unaffiliated Individual

**Representative Quote:** From a practical point of view, I would limit the access hours, both from Old Faithful and from West to prevent tourists becoming stranded late at night in sub-zero weather. Gates opening at 7 AM and closing at 6 PM would seem to reasonable to me. The cost of operations would seem to be fairly equal with the trade off of plowing as needed offsetting the "daily" grooming now.

**Corr. ID:** 869                      **Organization:** *Not Specified*

**Comment ID:** 127537            **Organization Type:** Unaffiliated Individual

**Representative Quote:** I would like to see more accessibility to the Park in winter. Perhaps some of the main roads could be plowed to accommodate private vehicles. I listened to comments in the warming huts regarding the snow coaches. The most common comment was that the coaches were crowded and claustrophobic. Private vehicles usage would solve that problem. I would love to keep a groomed path for snowmobile usage. Perhaps a limit of private cars, like that which is in place with snowmobiles, could be considered. Please make these numbers reasonable to accommodate more people to view this great resource. Perhaps around 500 each time might be considered.

**Corr. ID:** 1328                      **Organization:** *Not Specified*

**Comment ID:** 128964            **Organization Type:** Unaffiliated Individual

**Representative Quote:** I feel that groomed roads like in West Yellowstone would be a good choice for many areas of the park, (which would also allow for sled/track usage.) Mandatory chains, and reduced speed limits also seem reasonable.

**Corr. ID:** 1533                      **Organization:** *Not Specified*

**Comment ID:** 129243            **Organization Type:** Unaffiliated Individual

**Representative Quote:** The idea of plowing from West to Old Faithful in the winter is a marvelous idea! There are no passes to go over and if there is a blizzard or strong wind storm, then the road could be closed for a short duration whenever needed. If they need to make the road "snow tires only" with "have chains available", for the safety of all, then super. It is definitely doable and preferable to the way it is currently, which stops so many hundreds of people from enjoying Yellowstone, and the Old Faithful area in the winter. Plowing - YES! Great Doable idea!

**Concern ID:** 23624

**CONCERN STATEMENT:** Commenters noted concern about the impacts of plowing on the park's wildlife. Specific areas of concern included added stress during the winter from more vehicles and changing the movements of the animals either from easier access on roads or from large snow berms created from plowing.

Other commenters felt this was not a concern as the wildlife are not impacted during the summer when there are vehicles in the park and that wildlife in the Lamar Valley do not seem impacted by winter vehicle use.

**Representative Quote(s):** **Corr. ID:** 386 **Organization:** *Not Specified*

**Comment ID:** 126685 **Organization Type:** Unaffiliated Individual

**Representative Quote:** I am interested in the possibility of plowing the roads in YNP in the winter. I am worried about the impact on animals who are weakened by winter stress but maybe very restricted speed limits will be able to remedy this. Or it could be a huge mistake.

I am interested in the cross country ski opportunities which also impact animals under stress.

**Corr. ID:** 864 **Organization:** *Not Specified*

**Comment ID:** 127525 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Plowing the parks roads is not an option in my opinion. Animals will hang out on the blacktop to absorb the warmth and will be hit by automobiles excessively.

**Corr. ID:** 965 **Organization:** *Not Specified*

**Comment ID:** 128347 **Organization Type:** Unaffiliated Individual

**Representative Quote:** I hope that any of the past politically filtered "science" that indicates plowing is harmful is re-analyzed, because anyone who thinks bison (or any of the other wintering animals) care whether a road is groomed or plowed is kidding themselves. All of the evidence indicates that they'll go where they want to go, regardless.

**Corr. ID:** 1205 **Organization:** *Not Specified*

**Comment ID:** 126400 **Organization Type:** Unaffiliated Individual

**Representative Quote:** As for the impact on wildlife, the access to the park from the north during the winter through the game rich Lamar valley over these many years has not had a negative impact on the wildlife so opening the additional roads to wheeled vehicles should have the same effect. Additionally, the wildlife in Yellowstone is exposed to wheeled vehicle traffic all of their lives and from my observation, they have become accustom to both the traffic and human observation without detriment.

**Corr. ID:** 1428 **Organization:** Jackson Hole Conservation Alliance

**Comment ID:** 129028 **Organization Type:** Unaffiliated Individual

**Representative Quote:** - Recent requests to plow the road from West Yellowstone to Old Faithful should be carefully analyzed. Plowing this road would have a greater impact on wildlife than the current over-snow use. The movement of animals would either be enhanced and animals would move along the road or they would be impeded in their attempts to get across the road. Neither is acceptable for the survival of wildlife.

**Corr. ID:** 1497

**Organization:** *Not Specified*

**Comment ID:** 128504

**Organization Type:** Unaffiliated Individual

**Representative Quote:** If the road is plowed and private vehicles are allowed, wildlife will suffer. During summer wildlife roams freely throughout their preferred habitat. When visitors leave their cars and follow animals into the forest for a better look or photograph, the wildlife keeps moving unimpeded further and further from the roadway to escape the pursuing public. The Madison River corridor is a fairly narrow defile through volcanic lava flows and is home to possibly the only non-migratory elk herd in the country. These elk winter in arguably the harshest conditions of any elk herd in North America. During winter the escape routes allowing elk to move away from danger such as uneducated tourists are blocked by deep snows. To escape public harassment, the elk expend tremendous amounts of critical energy moving through the deep snows to reach protected areas. These protected areas are not prime habitat and do not support the forage types necessary for the elk to survive the winter, so they soon move back again to the preferred river corridor. Currently guides educate their clients to the hardships of wintering wildlife and appropriate viewing techniques that do not disturb the animals. Guides partner with park service personnel in protecting the resource during this extremely critical time of year helping to insure the visitor opportunity to appropriately experience and be inspired by Yellowstone's unique winter resources and values. Since they started doing population counts on this elk herd in the early 1960's, it has remained quite stable at around 600 animals  $\pm$  200. Since the reintroduction of wolves, the herd has plummeted to fewer than 100 individuals. If the general public is allowed private, winter vehicular access through the West Entrance these elk, already a population of concern, will become more stressed by uninformed visitors and perhaps will suffer losses that should be unacceptable to Park managers.

**Corr. ID:** 1514

**Organization:** *Not Specified*

**Comment ID:** 128409

**Organization Type:** Unaffiliated Individual

**Representative Quote:** Plowing of the West Side Roads and opening the roads to general/public travel:

- While it is technically quite feasible to plow the West Side roads, I believe there is little relevant data on what this would cause for wildlife impact. Not only the impact on wintering wildlife by park visitors and their vehicles would need to be addressed, but also the effects of road plowing upon bison (or other wildlife) winter migratory movements. Bison gravitate to the bare paved roads almost immediately each spring within hours or a few days of the roads being plowed. It will be very difficult to model the effect of road plowing on migration of these herds. The data that currently exists is for groomed roadways, not roadways plowed to bare asphalt. The very limited data available for immediately following spring plowing would seem to indicate that migration of bison out of the park will be dramatically increased. Data for animal migration along the northern range road is not readily transferable to interior roads. Mitigation efforts on the northern range road have included installation of cattle guards (east end of the Gardiner River "High Bridge" near Undine Falls) and hazing with very limited success.

**Corr. ID:** 1541

**Organization:** *Not Specified*

**Comment ID:** 129143

**Organization Type:** Unaffiliated Individual

**Representative Quote:** 2. The plows themselves will be the largest, fastest moving vehicles on the road and it can only be imagined what threat to wildlife those plows will pose.

**Corr. ID:** 1541

**Organization:** *Not Specified*

**Comment ID:** 129144

**Organization Type:** Unaffiliated Individual

**Representative Quote:** 3. There is great likelihood that snow berms will prove detrimental to wildlife. Furthermore, with the accumulation of dirt and gravel the berms could become aesthetically distracting.

**Concern ID:** 23625

**CONCERN STATEMENT:** Commenters suggested certain amenities that they would like to see under an alternative with road plowing such as: addition parking lots, extended hours for concessionaires to service increased visitation, and keeping the park open in November.

**Representative Quote(s):** **Corr. ID:** 237 **Organization:** *Not Specified*

**Comment ID:** 127332 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Plow the road to Old Faithful! Plow parking lots at turnouts at the end of plowed sections, for trailered snowmobiles, skiers, and snowcoaches.

**Corr. ID:** 260 **Organization:** Yellowstone Ski Festival

**Comment ID:** 127528 **Organization Type:** Unaffiliated Individual

**Representative Quote:** If plowing the roads is deemed the best answer, then the park should be open during November. If another winter use plan is in action, I would like to see it include an option for entering the park in November whether it is motor-powered or not.

**Corr. ID:** 437 **Organization:** *Not Specified*

**Comment ID:** 129467 **Organization Type:** Unaffiliated Individual

**Representative Quote:** There are possible downsides to such a plan, of course. Concessionaires who depend on providing over-snow transport for visitors would lose some revenue, but those people would surely find other options for income that would capitalize on the increase in winter visitation. Provisions would need to be made by the concessionaires (inside & outside the park) to deal with increased visitation & their vehicles; lodging, food & drink, medical care, waste disposal, fuel stations & automotive repair centers would all be required. These services exist already, but expanded service hours/seasons need to be addressed in any viable plan.

**Corr. ID:** 767 **Organization:** *Not Specified*

**Comment ID:** 127102 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Lastly, to those that come to Yellowstone to experience and enjoy the quiet solitude of winter, this plan would benefit them also. Personal vehicles are much quieter than snowmobiles and snowcoaches. Parking could be provided at Madison Junction and the Old Faithful complex. These areas could act as trailheads into the back country for day hikes or overnight camping. Those that would like to could quickly and easily avoid any sight or sound of civilization and enjoy a truly wilderness experience!

**Corr. ID:** 1415 **Organization:** *Not Specified*

**Comment ID:** 127676 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Please plow out parking for at least one car along the roadway at each the entrance & exit of the circle drive at Soda Butte Picnic area.

**Corr. ID:** 1514 **Organization:** *Not Specified*

**Comment ID:** 128421 **Organization Type:** Unaffiliated Individual

**Representative Quote:** - Old Faithful and Norris Geyser Basin would need to be developed in a manner to serve both snowmobile/snowcoach access as well as wheeled



vehicle access. Oversnow parties would arrive at both of these destinations from the east side as well as wheeled vehicles from the west side.

**Concern ID:** 23626

**CONCERN STATEMENT:** Commenters asked that a range of possible scenarios for an alternative that includes road plowing be considered, and provided suggestions for that range.

**Representative Quote(s):** **Corr. ID:** 191 **Organization:** *Not Specified*

**Comment ID:** 129473 **Organization Type:** Unaffiliated Individual

**Representative Quote:** In general, the fourth EIS needs to give plowing more serious consideration than it has been given before. Alternatives in the EIS need to consider 1) plowing all of Yellowstone's roads in winter (except Sylvan and Dunraven Passes) and 2) plowing only those roads from Old Faithful north and west to Mammoth and West Yellowstone. Under both these scenarios, the EIS needs to consider at least two different travel options: a) allowing the public to drive their own vehicles on the plowed roads, and b) requiring visitors to the park interior (the area south of Mammoth/Tower) to take commercially-provided buses or vans. Under the two scenarios that would only plow the park's west-side roads, the EIS should consider restricting the east- and south-side roads to I) snowcoaches only, II) snowmobiles only, and III) a mix of the two.

**Corr. ID:** 893 **Organization:** *Not Specified*

**Comment ID:** 126281 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Doing as I suggest, would give the wintertime tourist at least three options of visiting the Park in the winter: 1) Personal vehicle transportation between West and Old Faithful and between West and Mammoth; 2) Snowmobile and snowcoach transportation between Norris and Canyon and then on to Old Faithful; and/or 3) Snowmobile and snowcoach transportation between the South gate and Old Faithful. The visitors from the North gate would have the choice of: 1) Driving their own vehicle to Old Faithful, or 2) Driving to Norris and then take snowmobiles or a snowcoach to Canyon and then around by Lake to Old Faithful. The visitors coming in through the East gate would have a straight shot on snowmobile to Old Faithful and/or Canyon.

Think about how much easier it would be for Park personnel to get from Mammoth to Old Faithful (jump in the car and go). How much easier it would be to deal with heating and vehicle fuel in the interior of the park during the winter. How much more convenient it would be for the disposal of garbage throughout the winter. How much more convenient it would be for the construction people working in the Park in the winter. The list goes on and on.

**Concern ID:** 23629

**CONCERN STATEMENT:** Commenters suggested that if wheeled vehicles are allowed in Yellowstone in the winter, they should be transit/bus vehicles only and that private vehicle use should not be permitted.

**Representative Quote(s):** **Corr. ID:** 321 **Organization:** *Not Specified*

**Comment ID:** 126452 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Hard surface wheeled vehicle winter maintenance to the Old Faithful Area from West Yellowstone should be a considered alternative in this EIS process. Though I am personally skeptical of the need and feasibility of such an action, nonetheless the time has come for such an analysis. The climate change reality of more heat and less cold may result in later snow accumulation and earlier snow melt which

would restrict tracked vehicle use on this corridor. Visitor access may be best accommodated by coach or bus transportation, on the road maintained for that purpose. The transition from fall closure to winter coach access and the spring transition from coach access to private automobile must be carefully analyzed and subjected to adaptive management review with attention given to wildlife impacts and staffing requirements. Such an alternative may leave oversnow access exclusively to the South entrance, which should be evaluated as to purpose and need, but not completely dismissed from the mix of winter access options.

**Corr. ID:** 898                      **Organization:** *Not Specified*

**Comment ID:** 127730            **Organization Type:** Unaffiliated Individual

**Representative Quote:** The best option for motorized winter access in YNP is to minimize intrusion into the interior of the Park by confining access to the north and west entrances and plowing the road to Old Faithful from West Yellowstone. Commercial buses only and no passenger's cars would be allowed on the road to Old Faithful. Both sightseeing trips and express trips should be provided daily. The intermediate guided tour is nice the first time, but hard to tolerate repeatedly.

**Corr. ID:** 1300                      **Organization:** *Not Specified*

**Comment ID:** 128253            **Organization Type:** Unaffiliated Individual

**Representative Quote:** - If plowing the road is considered, I recommend allowing only allowing commercial buses rather than personal vehicles

**Corr. ID:** 1300                      **Organization:** *Not Specified*

**Comment ID:** 128249            **Organization Type:** Unaffiliated Individual

**Representative Quote:** Although interest in plowing the road from West Yellowstone to Old Faithful has been rekindled, if considered, I suggest that use be restricted to commercially buses rather than personal vehicles. Park wildlife is under great stress in winter and increased access by people traveling in personal vehicles risks increasing the stress to wildlife. Also, since snowfall is traditionally heavier in this area than in the Mammoth to Cooke city route, I maintaining safe routes of travel for the public would be problematic.

**Corr. ID:** 1464                      **Organization:** *Not Specified*

**Comment ID:** 128928            **Organization Type:** Unaffiliated Individual

**Representative Quote:** An alternative for commercial over-the-road travel along currently plowed roads should be considered. Mass transit may serve as a means to reduce impacts while providing economic opportunity. Therefore, such an alternative should be weighed within the winter use planning analysis.

**Concern ID:** 23630

**CONCERN STATEMENT:** While in support of road plowing in certain areas of the park, commenters suggested areas they felt should not be plowed including:  
- east side of the park

**Representative Quote(s):** **Corr. ID:** 104                      **Organization:** *Not Specified*

**Comment ID:** 126911            **Organization Type:** Unaffiliated Individual

**Representative Quote:** The east side of the park should stay over snow with moderate grooming. Plowing would be a waste on the east side because of lack of visitation.

**Corr. ID:** 1547                      **Organization:** *Not Specified*

**Comment ID:** 129174      **Organization Type:** Unaffiliated Individual

**Representative Quote:** The South entrance from Flagg Ranch to Old Faithfull sees very heavy snowfall periods including Craig pass and an area south of Lewis Falls. The East entrance with Sylvan Pass obviously would also be very expensive if not impossible as well.

**Concern ID:** 23632

**CONCERN STATEMENT:** Commenters requested specific portions of road to be plowed under the Winter Use Plan including:

- the 10 mile section of Highway 212 from Cooke City to Pilot Creek
- Colter Pass
- the 11 miles between Cooke City and 296

**Representative Quote(s):** **Corr. ID:** 114      **Organization:** *Not Specified*

**Comment ID:** 126957      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Please, please consider plowing the 11 or so miles between Cooke City and the WY border on 296, therefore opening up the NE entrance for cars during the winter. Since the north road is already plowed, this would provide ez access from Cody into the Park.

**Corr. ID:** 114      **Organization:** *Not Specified*

**Comment ID:** 126959      **Organization Type:** Unaffiliated Individual

**Representative Quote:** As of now, people living around Cody need to travel too far to get to the North entrance to get into the Park. By simply plowing those extra 11 miles, you'd solve lots of access problems. That's a lot less plowing than West Yellowstone to Madison, to Old Faithful.

**Corr. ID:** 725      **Organization:** *Not Specified*

**Comment ID:** 127030      **Organization Type:** Unaffiliated Individual

**Representative Quote:** I am a avid Yellowstone visitor. My activities while in the park include, hiking, fly fishing, wolf watching and a myriad of other activities. Although most of my wife and I's use is summer visitation, we make several trips to the park in winter. Living in Cody and making the loop to get in from Mammoth is long, but it is always worth it. Is it possible to maintain the 8-10 miles from Pilot Creek to Cooke Pass open for car travel in winter? Since the East entrance has so little use in winter I had always thought it would be nice to offer an alternative to the visitors coming from the eastern part of the country.

Thank you for your time and consideration.

**Corr. ID:** 1251      **Organization:** *Not Specified*

**Comment ID:** 126547      **Organization Type:** Unaffiliated Individual

**Representative Quote:** I would also like to bring to the YNP attention the increased visitor use of YNP & neighboring communities if the 10 mile section of Hwy 212 from Cooke City to Pilot Creek Parking was also plowed. YNP should consider this also in the winter use plan. This would make a great loop for visitors all around, whether snowmobiling in Cooke City or going through Yellowstone for wildlife viewing, etc.

**Corr. ID:** 1416      **Organization:** *Not Specified*

**Comment ID:** 128403      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Due to the avalanche risk on the East Entrance, I am in favor of closing the East Entrance to over snow vehicles. Snow coaches and snow machines should still be allowed to travel from Fishing Bridge, to the Lake Overlook on the east side of the lake. Because of the closure to the East Entrance, I am in favor of plowing Colter Pass ,US 212, year-round with the caveat that as much planning and construction of parking and trail heads is performed by the NPS and Gallatin National Forest as will be made to accommodate parking and services at the new trailhead locations at Norris and Old Faithful.

**Corr. ID:** 1531

**Organization:** Cody Country Chamber of Commerce

**Comment ID:** 129380

**Organization Type:** Town or City Government

**Representative Quote:** Northeast Entrance Access

Although not formally, Cody considers itself to be a gateway to the Northeast Entrance to Yellowstone National Park as well as to the East Entrance. It is a popular entrance for wildlife watching trips during the spring, summer, and fall. Three Cody businesses specialize in guided tours that take visitors into the Lamar Valley.

Once the snow flies, however, wheeled-vehicle access into Cooke City route from Cody through Sunlight Basin and Cooke Pass, is cut off. We recommend that you assess the costs and benefits of keeping this highway open year-round so that visitors from Cody - and from anywhere else, for that matter - can enter and/or exit the Park through the Northeast Entrance. We estimate that, were the Northeast Entrance to be open, an average of 250 visitors a week would come into the Lamar Valley area to observe wildlife (100 each day on weekends and 10 each day on week days).

We recognize that the Park does not have responsibility for keeping the road East of Cooke City open in the winter. However, if there were a way to keep it open, this would allow visitors a unique wildlife experience. At the same time, we recognize that wildlife is under heavy stress in the winter, so we recommend that the EIS assess the impact of higher human traffic on all wildlife. This fits your stated objective of providing the public an opportunity to experience and be inspired by Yellowstone's unique winter resources and values while ensuring resource protection.

**Concern ID:** 23633

**CONCERN STATEMENT:** Commenters raised questions related to plowing and park operations and visitor use they felt should be addressed in the plan/EIS. These questions included: where do funds for plowing come from; how can the park keep up with snowfall during heavy snow years; how would visitation be impacted if roads could not be opened on time; how will the park address damage to the road base; the impact of traffic jams in the winter; will there be adequate services for winter visitors; what would operating hours of the park be, as well as question related to what the visitor can see/do in the winter in a vehicle and how the park can manage this use in the winter.

**Representative Quote(s):** **Corr. ID:** 364

**Organization:** Not Specified

**Comment ID:** 126641

**Organization Type:** Unaffiliated Individual

**Representative Quote:** Others have advocated plowing the roads from West to OF and even Mammoth to OF. In a snow year such as 2009-2010, this would not appear to be a big problem. However, during "normal" snow years, I can't begin to imagine the difficulty in keeping the roads plowed, not to mention the accidents that private vehicles would encounter.

**Corr. ID:** 884

**Organization:** Not Specified

**Comment ID:** 127590      **Organization Type:** Unaffiliated Individual

**Representative Quote:** First, where do the funds for keeping roads snow-free in winter come from, as well as building and maintaining infrastructure to support the extra people expected to be present at places like Old Faithful?

Secondly, how do you plow the roads without making huge piles of snow on the roads, which prevent wildlife from easily crossing the roads?

How do you handle the obvious conflict between over-the-snow vehicles and passenger vehicles? Half the road for OSV's and half for passenger cars? It is only a two way road. If you ban snow coaches as OSV's, what does that do to the businesses involved?

**Corr. ID:** 1334      **Organization:** *Not Specified*

**Comment ID:** 128812      **Organization Type:** Unaffiliated Individual

**Representative Quote:** If the alternative to plow the roadways for wheeled vehicles is chosen, will the Park be mandated to conduct an environmental impact study prior to this alternative being implemented? There is currently no historical documentation of the effects the impact of commercial and/or private wheeled vehicle use would have on the natural resources and wildlife in the interior of Yellowstone. Without elaborating on the subject, I strongly believe that mixing modes of winter transportation (snowcoaches, snowmobiles, skiers AND wheeled vehicles) would be a logistical nightmare; having to create large staging areas, overnight storage and maintenance facilities.

**Corr. ID:** 1469      **Organization:** *Not Specified*

**Comment ID:** 128917      **Organization Type:** Unaffiliated Individual

**Representative Quote:** 4) Traffic jams in winter conditions--One Bald Eagle or a bison herd in summer between the West Entrance and Madison Junction can snarl traffic for 2-3 miles or one hour+. Winter conditions would make this far more challenging. Would there be continual enforcement to move this traffic along? Imagine the vehicles wanting to stop for a wolf, bull elk, or bobcat? And then what happens if a severe snow storm is added to this scenario? I imagine that bison and other wildlife utilize plowed or groomed roads as they look for the easier traveling routes, and this would impact traffic.

**Corr. ID:** 1469      **Organization:** *Not Specified*

**Comment ID:** 128912      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Concerns: 1) Impact on roads and resultant damage. Right now roads are always under construction somewhere in the park due to age or weather damage. I would think complete snow removal would create greater road damage when the road base is subject to extreme cold and thawing conditions. As tight as federal budgets and especially national park system budgets are, I would think dependable dollars could be difficult to find. 2) Would snow removal cost more or less than current winter road grooming?

**Corr. ID:** 1469      **Organization:** *Not Specified*

**Comment ID:** 128918      **Organization Type:** Unaffiliated Individual

**Representative Quote:** 5) Will winter park visitors be adequately equipped with proper winter outerwear and footwear if breakdowns, traffic jams, below zero temps, or reduced visibility become a problem. 6) Will there be adequate housing, gasoline, repair and medical services, law enforcement, rescue, and food at Old Faithful or elsewhere if crowds are forced to have an extended stay?

**Corr. ID:** 1469      **Organization:** *Not Specified*

**Comment ID:** 128922      **Organization Type:** Unaffiliated Individual

**Representative Quote:** 7) Does YNP need to be heavily impacted in the winter?

8) Will there be daily open and closing times for wheeled use or open 24/7?

9) How much delay could occur when vehicles go off the road or have some other type of accident?

10) YNP is a pristine place. It is a special place.

**Corr. ID:** 1541

**Organization:** *Not Specified*

**Comment ID:** 129145

**Organization Type:** Unaffiliated Individual

**Representative Quote:** Winter-wheeled vehicle travel runs the risk of complete road closures during severe weather systems to the detriment of businesses and the visiting public they serve.

**Corr. ID:** 1575

**Organization:** Yellowstone Tour & Travel Summer and Winter

**Comment ID:** 129567

**Organization Type:** Business

**Representative Quote:** 11. Would you be able to see over the snow banks from an automobile window?

12. Would the snow banks be as high in the park as on the East side of the gate as they are north of town? Would the snow banks be 5-8 ft. high?

13. Would this 60 mile car trip be likely to replace and increase the number of visitors that currently come into the Park for a unique experience by snowmobile and snowcoach? Even last year this was almost 17,000 visitors. Many of these were in holiday times. How many cars could be bunched together into holiday times?

14. Last year on Dec. 29 there were 295 people on snowmobiles and 326 on snowcoaches for a total of 621 divided by 3 people per car equals approx. 207 cars. Considering uncertain road and weather conditions, is that safe?

15. There is a real bottle neck at the eagles nest in the summer while people wait their turn to get a picture. How many accidents and road jams would be exacerbated when people cannot pull off the roads to stop and take a picture wherever the animals happen to be?

16. Part of this experience in the past has been the fun, unique transportation. Would this cause those who want that experience to go through Jackson or Cody or Gardner thereby leaving out West Yellowstone?

17. Interpretive experiences are enhanced with drivers, guides and rangers. How would the interpretation of winter in Yellowstone be imparted to the public?

18. How many more rangers would it take to impart information and to man and control buffalo and other animal road jams?

19. Health and safety of employees and the public are major objectives of the Park. What about passing snowplows on narrow roads that need to go 30 miles per hour to throw the snow 20 ft?

20. How can snowplow go fast enough to push off snow when they have to follow animals to the next opening?

**Corr. ID:** 1575

**Organization:** Yellowstone Tour & Travel Summer and Winter

**Comment ID:** 129566

**Organization Type:** Business

**Representative Quote:** 1. Will public automobiles be allowed in on a plowed road to Old Faithful or would it be restricted to concessionaires vans or busses?

2. Would plowing the road to O.F. create a missing link for those wanting to go to Mammoth, Canyon, around the loop etc.?

3. How would administrative travel navigate throughout the Park?

4. Would this 60 mile round trip automobile experience be enticing enough to fly from anywhere to here?

5. Would this be a local drive market only? How many nights would they be likely to stay? Over snow packages stay 3-7 nights.
6. Rangers are not allowed out when 20 below or colder. Would people want to drive in on 30 below mornings and snowy blizzard conditions? Could they?
7. The roads have only been closed to over snow vehicles a few days in the last 10 years. How many days per normal year would the roads be "temporarily" closed like Sylvan Pass throughout the winter that would create public uncertainty?
8. Would this one road segment (to Old Faithful) suffice in fulfilling the right of the People to see "Yellowstone in the winter"? What about the rest of it?
9. What kind of safety hazards would be encountered?
10. Would another EIS have to be done with several years of testing in order to assess the heart monitoring of the wildlife impacts from cars pushing animals down the road with high snow banks?

**Corr. ID:** 1575                      **Organization:** Yellowstone Tour & Travel Summer and Winter

**Comment ID:** 129568              **Organization Type:** Business

- Representative Quote:** 21. Is there sufficient space on the narrow roads and bends with narrow right of ways for pushing snow off road? There is 45 ft. between roads and trees north of town, 10 to 15 ft. between the road and trees on a typical park road?
22. What happens when a snowplow is coming, an oncoming car is blinded by a sudden storm and hits had on or has a major accident that causes loss of life?
23. If rotaries are used, would trees be decimated as along the Ashton Hill? What about animals large and small?
24. The Park Service has stated in many meetings that they would not plow the roads for public automobiles because of some of the reasons pointed out here and that controlled concessionaire agreements would be required. Is this still the case?
25. It has been said that Animal rights activist and anti snowmobile groups would still sue if the roads were plowed. Is that the case?

**Concern ID:** 23635

**CONCERN STATEMENT:** Commenters suggested various alternative scenarios that provided a mix of OSV and wheeled vehicle use in the park during the winter.

**Representative Quote(s):** **Corr. ID:** 883                      **Organization:** Not Specified

**Comment ID:** 127583              **Organization Type:** Unaffiliated Individual

**Representative Quote:** For those tourists visiting from the Jackson and Cody entrances to Yellowstone Park, they would benefit by visiting in the old style. This would at least keep these two towns economically viable. It would increase snow mobile numbers available to them because of the reduced need by West Yellowstone. With such a plan in place the economies of all the towns around Yellowstone Park would not be damaged to badly. There would be an increase in visitor usage, increased entrance fee revenues, a decrease in the purchase of special use equipment and a better Yellowstone Park, community relationship.

**Corr. ID:** 965                      **Organization:** Not Specified

**Comment ID:** 128340              **Organization Type:** Unaffiliated Individual

**Representative Quote:** What if the roads were plowed from West Yellowstone to Mammoth and Old Faithful, and Flagg Ranch to Grant? Snowcoaches and snowmobiles could be staged at Old Faithful, Norris, and Grant to provide access to Canyon and the Lamar, West Thumb, etc., for folks that want that unique and historical experience. This would be much like the way horses and stagecoaches are staged at Tower and Canyon and motorized ferries are staged on Yellowstone Lake in the summer now. But visitors would also have plowed access to many of the features that make Yellowstone unique,

enough so that a "complete" Yellowstone winter experience could be had with nothing more than a Park pass and a car.

**Corr. ID:** 1486                      **Organization:** Yellowstone Business Partnership

**Comment ID:** 128741              **Organization Type:** Unaffiliated Individual

**Representative Quote:** - Continued grooming of the snow-road from Flagg Ranch north to Canyon should be evaluated to serve a variety of north-south transport needs such as:

o Snowcoach service from Flagg Ranch to Norris (and reverse) to access lodging destinations in Yellowstone. This route could include a rest stop and sightseeing option at Canyon.

o Guided snowmobile trips from Norris-Canyon-Flagg Ranch (and in the reverse direction)

o Drop-offs of backcountry skiers to access a hut-to-hut ski system that could be established, for example, from West Thumb to Old Faithful. Such a system would offer challenge and solitude not easily found in the Park today, and it would be enhanced if Craig Pass was closed to all oversnow vehicles.

- The highest Park passes near Canyon and Lake (Dunraven, Sylvan) would neither be plowed nor maintained for public oversnow travel. The EIS should indicate whether an earlier opening of those passes for bus and/or auto traffic would be feasible if neither is packed down by regular grooming.

- Concessioner contracts would need to be modified to provide for year-round operation of Mammoth and Snow Lodge visitor facilities and needed support facilities at Norris and Canyon.

- Bicycling opportunities could be accommodated in the late fall and early spring as soon as the snow melts. Buses could carry bikes or pull bike trailers during this period to permit extended pedaling seasons in designated areas after November 1st and before cars are allowed in late April.

**Corr. ID:** 1503                      **Organization:** *Not Specified*

**Comment ID:** 128463              **Organization Type:** Unaffiliated Individual

**Representative Quote:** YOU ASKED: What are some potential options for managing motorized winter use at Yellowstone?

Plow the West Side of Yellowstone. From the West Entrance to Old Faithful, and then from Madison to Mammoth.

Offer Oversnow experience from Old Faithful to Canyon or the South Entrance. People still wanting that unique experience of oversnow travel could still take snowcoaches or snowmobiles, much like the present boat rentals and tours offered in summer on Yellowstone Lake. I think there are already snow coach tours offered from Old Faithful to other parts of the park, so this is already somewhat established.

Continue Oversnow travel from the South Entrance to Old Faithful. Mountain passes would not be included in the plowing plan.

**Corr. ID:** 1581                      **Organization:** West Yellowstone Economic Development

**Comment ID:** 129843              **Organization Type:** Non-Governmental

**Representative Quote:** A non over-the-snow option is to plow the road from West Yellowstone to Old Faithful with some options for over the snow activities such as skiing and snow-shoeing along the route from West Yellowstone to Old Faithful.

- If the road from West Yellowstone to Old Faithful is plowed, consider allowing some



regulated BAT snowmobile access from Madison Junction to Canyon or from Old Faithful to Yellowstone Lake or other destinations. We would be willing to work with Park concessionaires to develop an operation's strategy that would be fair to all.  
- If the road from West Yellowstone to Old Faithful is plowed, consider allowing only commercial buses with limited stops for skiing along the route. Private car travel would be phased in over time.

**Concern ID:** 23637

**CONCERN STATEMENT:** Commenters raised questions related to health and safety they felt should be considered in the plan/EIS. These include: are visitors/employees safer in cars with airbags than on OSV; would there be numerous road closures for hazardous conditions; and how would visitors in adverse conditions be accommodated.

**Representative Quote(s):** **Corr. ID:** 844 **Organization:** Not Specified

**Comment ID:** 127421 **Organization Type:** Unaffiliated Individual

**Representative Quote:** When it comes to the issue of plowing to solve pollution, noise, access in the park and other issues; I don't think this would solve things. The noise of a snow plow is surely no better than snow vehicles, and the need for more often attention to the road would increase the strain on wildlife and park visitors alike. The snow banks left by plowing might be an un-needed strain on the animals trying to cross the road. The requirement of a guide during the winter helps protect and inform the guest in the fragile winter environments, not to mention the safety of all visitors being accounted for at the end of the day instead of the possibility of spending the night stuck in a snow bank in the middle of the park without anyone looking for you. Presently, with the northern road into the Lamar Valley open to cars and easily patrolled by NPS, I think the opportunity is there for visitors in cars. While the lower loop is the perfect web of possible over the snow trips, to fill the need for those who want such a vacation/ experience.

**Corr. ID:** 1482 **Organization:** Not Specified

**Comment ID:** 128753 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Health and Safety

I don't have data to support this thread, but my thought is that winter visitors would be much safer in modern automobiles with seat belts, air bags, ABS, crumple zones and hundreds of thousands of miles of operational experience rather than operating snowmobiles with which they have very limited skill or riding in ancient snowcoaches without modern safety equipment.

Furthermore, forcing park employees into operating snowmobiles as part of their job likely increases their risk of occupational injury due to the inherent lack of safety associated with snowmobiles. Consider a used snowmobile I contemplated buying from a park employee in Mammoth. It was 2-years old and had 10,000 miles on it that were all associated with hauling food back and forth from Mammoth and transporting himself to where his vehicle was parked. I can imagine many unsafe scenarios associated with employees driving snowmobiles through the Park pulling heavy loads at night.

**Corr. ID:** 1514 **Organization:** Not Specified

**Comment ID:** 128416 **Organization Type:** Unaffiliated Individual

**Representative Quote:** - A review of road closure data for the past several autumn seasons indicates that the roads have been closed several times each fall for "unsafe" driving conditions. If the roads are unsafe several days each October, the frequency of road closures during the winter months would likely only be greater. A high frequency of closures for park roadways would be damaging to the winter socioeconomics of local

communities. Conversely, keeping the roads open during treacherous driving conditions could be very dangerous to inexperienced drivers unfamiliar with winter driving conditions. The accident frequency and required ranger response on the road from Mammoth to Cooke City is indicative of the accident rate that could be anticipated with public access to plowed roadways.

**Concern ID:** 23638

**CONCERN STATEMENT:** One commenter requested clarification on if private vehicles would be permitted under an alternative with road plowing, or if there would be a requirement for commercial vehicles only.

**Representative Quote(s):** **Corr. ID:** 1517 **Organization:** *Not Specified*

**Comment ID:** 128308 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Here are several specific issues that I urge you to consider in this planning process:

Confusion About Plowing:

Some in my community seem convinced beyond any doubt that if the Park Service considers an alternative that would plow Yellowstone's west side roads, it would be for the purpose of opening the park in winter to private automobiles. Others say, no, the Park Service has found greater impacts associated with plowing in past studies of winter use alternatives, even when the plowing option that was studied would have allowed more limited, controlled wheeled access with commercial busses or vans. I am not stating a position about this. My comment is simply that the public deserves clarity from the Park Service about whether wheeled access would be private or commercial. The confusion has been hurtful in our community.

**Concern ID:** 23639

**CONCERN STATEMENT:** Commenters requested that the plan/EIS include an alternative that combines plowing the west side of the park with a Certified Leader/EPA compliant snowmobile component.

**Representative Quote(s):** **Corr. ID:** 1214 **Organization:** *Not Specified*

**Comment ID:** 129589 **Organization Type:** Unaffiliated Individual

**Representative Quote:** At least one alternative should model a combination of west side road plowing with a Certified Leader/EPA Compliant Snowmobile component for the east side of the Park.

**Corr. ID:** 1591 **Organization:** California - Nevada Snowmobile Association

**Comment ID:** 129922 **Organization Type:** Recreational Groups

**Representative Quote:** At least one alternative should model a combination of west side road plowing with a Certified Leader/EPA Compliant Snowmobile component for the east side of the Park.

Thank you for the opportunity to participate in this process. We would gladly visit further with the planning staff about any of the concepts we have suggested or issues we have raised.

**Concern ID:** 23641

**CONCERN STATEMENT:** Commenters suggested that the NPS include an "all season alternative," which includes a combination of plowed roads and bus access.

**Representative Quote(s):** **Corr. ID:** 1486 **Organization:** Yellowstone Business Partnership

**Comment ID:** 128738 **Organization Type:** Unaffiliated Individual

**Representative Quote:** We believe that such an "All-Season" operating scenario for Yellowstone National Park would provide the greatest number of social, economic and environmental benefits for visitors while protecting wildlife and wildlife habitat. Elements of this scenario are detailed below for further Park consideration and analysis:

- First, a Montana -Wyoming agreement would be needed to plow Colter (Cooke) Pass to allow for year-round access from the east over the Chief Joseph Highway (which is open year-round). If needed, an elevated snowmobile trail could be created on one shoulder and a truck/trailer parking provided at Pilot Creek to accommodate the existing snowmobile activity along this section of Highway 212.

**Corr. ID:** 1486 **Organization:** Yellowstone Business Partnership

**Comment ID:** 128729 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Interestingly, the winter use situation has now changed given the bright prospects for a year-round public transportation system that will eventually serve all five Yellowstone gateways. Linx is a new member cooperative that links existing transportation providers across 27 counties in Idaho, Montana and Wyoming, and markets their services through one integrated system. Linx was incorporated in January 2010 following the guidance of more than 50 volunteers representing business, agencies and nonprofit organizations, and one of its goals is to improve transportation services to and through Yellowstone and Grand Teton national parks.

Given the existence of Linx, YBP suggests that the Park Service evaluate a Plow/Bus Alternative in the Winter Use EIS to facilitate more affordable, year-round public access within Yellowstone National Park. From approximately November 1 through late April, the Park would be primarily accessed by fixed-route shuttle and interpretive tour buses that would operate by permit on plowed, low-elevation roads. With buses available to all winter guests, non-permitted private vehicles could be excluded from all plowed roads in winter, including the road from Mammoth through the Lamar Valley, as a human and wildlife safety precaution.

**Corr. ID:** 1486 **Organization:** Yellowstone Business Partnership

**Comment ID:** 128740 **Organization Type:** Unaffiliated Individual

**Representative Quote:** - Bus service would be offered year-round on the plowed, lowest elevation Park roads, connecting Cooke City west to Mammoth/Gardiner, south to Old Faithful, and west to West Yellowstone. In the winter a fixed number of quiet, mid-size buses would be permitted for guided wildlife tours and cross-park shuttles that would serve each plowed park entrance (Northeast, North and West). If the shuttles were part of Linx, advance reservations and electronic ticketing would be an automatic system service.

- The current policy that allows private vehicles on the road between Mammoth and the Northeast Entrance would need to be reconsidered. With access from the east possible under this all-season scenario, only legal residents of Silver Gate and Cooke City would need vehicular passes to travel through the Lamar Valley in winter. Snowmobilers would

have several options: access Cooke City and the national forest trails from the east; ride the bus/sled shuttle service that could be provided through the park from the west; or rent snowmobiles in Cooke City upon arrival by bus from either direction.

- Attractive educational and recreational day trips could be offered from Norris to the Canyon area using oversnow transportation. An economic and environmental evaluation would be needed in the EIS to assess use of the Norris parking lot as a bus transfer point and staging area for commercial snowcoaches and snowmobiles. Expansion of yurt or other appropriate lodging could also be considered for Canyon.

**Corr. ID:** 1486                      **Organization:** Yellowstone Business Partnership

**Comment ID:** 128742              **Organization Type:** Unaffiliated Individual

**Representative Quote:** In summary, the principles advanced under this suggested All-Season scenario are:

- 1) Up to three major Park entrances would be plowed and essential services available 12 months/year
- 2) Year-round connectivity would be maintained to four of five entrances to advance the well-being of gateway communities and the efficiency of Park/concessioner administration.
- 3) A variety of recreational and transportation alternatives would be offered within environmental constraints.
- 4) Hybrid or alternative fuel buses could be selected for all-season travel as they would be best for air quality, sound levels, carbon reduction, human safety, and minimizing human-wildlife conflicts.
- 5) The highest elevations would be preserved for winter wildlife security and to maintain their backcountry character.

NOTE: A map outlining these suggestions will be delivered to the Winter Use EIS staff under separate cover.

**Corr. ID:** 1528                      **Organization:** *Not Specified*

**Comment ID:** 129211              **Organization Type:** Unaffiliated Individual

**Representative Quote:** Option 1. Open the Park 12 months of the year to wheeled rubber tire traffic.

Start slowly with the West Yellowstone to Old Faithful - plowed, Then open the road Madison to Norris to Mammoth. Then plow Norris to Canyon + then Lake.

Utilize the buses + other commercial licensed carriers to take people in + out of the park.

See what the demand + interest is and develop the support systems of the Park + Commercial companies to meet the needs.

**Concern ID:** 23642

**CONCERN STATEMENT:** One commenter requested that if a plowed road option is include, that it permit private cars and not require a concessioner for access.

**Representative Quote(s):** **Corr. ID:** 963                      **Organization:** *Not Specified*

**Comment ID:** 128367              **Organization Type:** Unaffiliated Individual

**Representative Quote:** Lastly I would encourage and support the further discussion of plowing the road system, allowing for equal opportunity by all types of people to see the Park and its many wonders. This idea is added with strong language, this plan should be

PRIVATE motorized access, NOT a bussing system or concessioner's only system. This plan should allow the general public to be able to navigate the park at their own leisure in a manner similar to summer regulations. I feel this would protect the general public as well as the local communities from the danger of the prices of such activities skyrocketing out of control and becoming unattainable as they have done today.

**AL5095 - Alternatives: Transition Period**

**Concern ID:** 23643

**CONCERN STATEMENT:** Commenters requested that there be a one-year transition period before any new regulations take effect to allow businesses and visitors to plan for any changes in management.

**Representative Quote(s):** **Corr. ID:** 911 **Organization:** West Yellowstone Snowmobile and Snowcoach Operators

**Comment ID:** 127920 **Organization Type:** Business

**Representative Quote:** Please consider a one year transition period after the EIS is completed in late fall of 2011 to allow operators to make appropriate spring snowmobile orders to prepare a prospectus for the pending new contracts. The public also needs to be able to plan with sufficient certainty in advance to accommodate early vacation planning and airline discounts. Without this provision the operators could each be sitting on hundreds of thousand of dollars of new machines and would not be able to use them. This Transition year would only be needed if the end result of the EIS is lower that the current 318.

**Corr. ID:** 962 **Organization:** *Not Specified*

**Comment ID:** 128006 **Organization Type:** Unaffiliated Individual

**Representative Quote:** At least one alternative should include a one-year (or more) transition period after the EIS is completed in late fall of 2011. Having a decision made on winter access to Yellowstone Park within a very short period, possibly only 30 days before that 2011-2012 season begins, would be a hardship on the snowmobile operators and the general public. This transition period would allow operators and the general public to make appropriate plans for the 2011-2012 season. Snowmobile operators need to place orders for machines in spring 2011, and the public needs to be able to make plans to visit the park with sufficient certainty that will accommodate early vacation planning and airline discounts.

**Corr. ID:** 968 **Organization:** *Not Specified*

**Comment ID:** 128017 **Organization Type:** Unaffiliated Individual

**Representative Quote:** In addition to support of plowing, suggest the next plan include a provision for allowing a full year between final decision and implementation. The last-minute timing of the implementation of all the decisions has been an immense disservice to businesses and guests alike.

**Corr. ID:** 1216 **Organization:** *Not Specified*

**Comment ID:** 126381 **Organization Type:** Unaffiliated Individual

**Representative Quote:** And finally, I encourage you to include in your alternatives a reasonable and sufficient transition period, at least a year, where the new plan is implemented. Making changes to the management plan on short notice like has been done in the past is devastating to local businesses outside the Park as well as hardship on visitors like myself who often plan our visits to Yellowstone months in advance.

**Corr. ID:** 1313                      **Organization:** BlueRibbon Coalition; Idaho State Snowmobile Ass'n; Montana Snowmobile Ass'n

**Comment ID:** 129100              **Organization Type:** Unaffiliated Individual

**Representative Quote:** (6) A transition period to any final long-term plan to avoid the perennial cloud of uncertainty suffered by the public and local communities attempting to predict how planning or litigation might unpredictably change on the eve of the Park's opening day.

**Corr. ID:** 1395                      **Organization:** *Not Specified*

**Comment ID:** 127119              **Organization Type:** Unaffiliated Individual

**Representative Quote:** 2) It would be appropriate and respectful for the visiting public and the vendors involved if a one year transition year was granted.

**Corr. ID:** 1473                      **Organization:** International Snowmobile Manufacturers Association

**Comment ID:** 128808              **Organization Type:** Unaffiliated Individual

**Representative Quote:** 6. We believe a transition period to the hopefully long term final winter use plan be considered given the late final decision date for this process. The objective should be to allow adequate planning and organization time for businesses, communities and individuals following a new rule announcement and the impact the announcement will have.

Thank you for the opportunity to participate in this process. Please feel free to contact me should you have any questions or if you would like to have additional discussions. I am available to meet and review issues with you.

Thank you,

**Corr. ID:** 1575                      **Organization:** Yellowstone Tour & Travel Summer and Winter

**Comment ID:** 129559              **Organization Type:** Business

**Representative Quote:** Please consider a one year transition period after the EIS is completed in late fall of 2011 to allow operators to make appropriate spring snowmobile orders and to prepare a prospectus for the pending new contracts. The public also needs to be able to plan with sufficient certainty far in advance to accommodate early vacation planning and airline discounts. Without this provision the operators could each be sitting on hundreds of thousands of dollars of new machines and would not be able to use them. This transition year would only be needed if the end result of the EIS is lower than the current 318.

**Corr. ID:** 1648                      **Organization:** Utah Snowmobile Association

**Comment ID:** 129938              **Organization Type:** Civic Groups

**Representative Quote:** Finally, we support including into any final Winter Use plan a one-year transition period after the environmental Impact Statement is approved before actual implementation of the Plan. We see this as important because of the prior planning that is necessary for both visitors and service providers. Rental operators get their best deal by placing orders for snowmobiles in the spring of each season. A better business decision can be made if they know the parameters under which the Park can be accessed. Similarly, visitors, particularly families, can make better plans for coming to YNP if they know well in advance what restrictions they are going to face and whether they have an adequate window to get the best discounts on accommodations and transportation.

**AL5098 - Alternatives: Gate Allocations**

**Concern ID:** 23644

**CONCERN STATEMENT:** Commenters requested flexibility in how OSV numbers are allocated between gates. Some suggested that if one gate knew in advance they would not use their allocation, those numbers could be transferred to another gate.

**Representative Quote(s):** **Corr. ID:** 962 **Organization:** *Not Specified*

**Comment ID:** 128004 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Previous years management also shows a need for flexibility in the gate allocation. For example, if a gate operator knows in advance that they will not use their gate limit, those numbers should be able to transfer to another gate. At least one alternative should include a flexible gate allocation process.

**Corr. ID:** 1202 **Organization:** Idaho Department of Parks & Recreation

**Comment ID:** 126534 **Organization Type:** Unaffiliated Individual

**Representative Quote:** The alternatives should examine a range of snowmobile daily use limitations. The winter plan should also examine adaptive management strategies which would allow NPS to shift entrance numbers to various entrances if other entrances limits are not being fully use. This would allow more visitors to enter at other entrances.

**Corr. ID:** 1313 **Organization:** BlueRibbon Coalition; Idaho State Snowmobile Ass'n; Montana Snowmobile Ass'n

**Comment ID:** 129099 **Organization Type:** Unaffiliated Individual

**Representative Quote:** (5) Allocation of the daily entry cap between entry portals, and flexibility from any allocation system to allow unutilized days to be allocated on short notice to other portals.

**Corr. ID:** 1648 **Organization:** Utah Snowmobile Association

**Comment ID:** 129931 **Organization Type:** Civic Groups

**Representative Quote:** Learning from past experience, it is well known that visitation numbers at the entrance gates to YNP varies considerably. Consequently, a firm number of entrants at each gate is overly restrictive and unnecessary when trying to maintain any overall cap of riders allowed in the Park. Therefore, at least one alternative should contain a provision for transferring unused gate limit capacity to another gate when it is known in advance that such capacity would otherwise go unused.

**Corr. ID:** 1683 **Organization:** Blue River Coalition

**Comment ID:** 130149 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Previous years management also shows a need for flexibility in the gate allocation. For example, if a gate operator knows in advance that they will not use their gate limit, those numbers should be able to transfer to another gate. At least one alternative should include a flexible gate allocation process.

**Concern ID:** 23645

**CONCERN STATEMENT:** One commenter suggested a change in the way the allocation for the west gate is calculated.

**Representative Quote(s):** **Corr. ID:** 1575 **Organization:** Yellowstone Tour & Travel Summer and Winter

**Comment ID:** 129550 **Organization Type:** Business

**Representative Quote:** Please consider returning the West Entrance snowmobile entries to 55% as they were historically.

However, for purposes of illustration, based on a 50% allocation and applying the same park wide scenario, under a "Flexible Daily Snowmobile Limit" the West Gate could receive the following allocation under this possible scenario:

245 snowmobiles X 90 days would equal a Seasonal Cap of 22,050  
Flexible Daily number 33% higher (325) for 20 days would equal 6,500  
Normal daily allowed number of 245 snowmobiles for 50 days equals 12,250  
Flexible Daily number 33% lower (145) for 20 days equals 3,300  
West Gate Total Season Cap 22,050

The 245 number could be adjusted to keep under the 540 overall limits as stated under PARKWIDE.

### ***AL6000 - Alternatives: Support Snowmobiles Using Sylvan Pass and East Entrance***

**Concern ID:** 23646

**CONCERN STATEMENT:** Commenters requested that Sylvan Pass and the East Gate remain open, with some suggesting the time it is open in the winter be extended.

**Representative Quote(s):** **Corr. ID:** 905 **Organization:** Wyoming Business Council

**Comment ID:** 127298 **Organization Type:** State Government

**Representative Quote:** Reliable access from all gateway communities is essential. In June of 2008 the State of Wyoming, Park County Wyoming and the National Park Service reached an agreement regarding avalanche management on Sylvan Pass. Please honor the spirit and letter out that agreement. Closures of Sylvan Pass affects planned trips and outfitted viability.

**Corr. ID:** 941 **Organization:** *Not Specified*

**Comment ID:** 127859 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Sylvan pass should remain open. I think it could be managed much more inexpensively, just as it was in the past with the same perfect safety record as in the past. The pass should open a week earlier and remain open a week later than the current plan. If it is safe enough for park personnel and wildlife research to travel over, it is safe enough for the public.

**Corr. ID:** 1490 **Organization:** *Not Specified*

**Comment ID:** 128703 **Organization Type:** Unaffiliated Individual

**Representative Quote:** It has not been proven scientifically or on the basis of your safety arguments that it is imperative to the well being of the eco-system to foreclose citizen access to the wonders of Yellowstone through the East Gate. In fact, it is contrary to the mandate of your mission to design a strategy of exclusion of US citizens, including gateway residents, through the East Gate. The fact that it costs money to keep the gate open is part of the Park's obligation to facilitate citizens' experience of the wonders of Yellowstone. It is not science to say that since you have closed, the limited access and nearly destroyed East Gate winter economy has reduced accidents and wild game losses. Clearly, it is not provable that East Gate unguided snowmobile riders were responsible



for 70% of the harassment and wildlife deaths. A survey would reveal to you (as scientific as that can be) that the folks who enter from the East Gate, including those guests guided by professionals like Tom Phipps, Bob Coe and Gary Fales, are generally very sensitive to the delicacy of the wilderness, the weakened condition of the wildlife and the issues of pollution and speed. There has been a learning experience in all aspects of the industry, from those who design snowmobiles, to those who ride them, to enjoy nature at its best which has reduced the safety risks, harassment risks, the mortality risks and the environmental risks. The fact remains that the underlying reason for this conflict is you do not want to spend the money to keep the gate open. You want to eliminate that expense notwithstanding that it flies in the face of the mandate that you are to preserve the Park for mankind to enjoy.

**Corr. ID:** 1523                      **Organization:** Wyoming Legislature

**Comment ID:** 128280            **Organization Type:** Unaffiliated Individual

**Representative Quote:** ALLOW PUBLIC TO ENJOY YNP IN WINTER  
YNP cannot close Sylvan Pass and the East Gate and also claim that their goal is to allow the public to enjoy the East Entrance of YNP in the Winter!

**Corr. ID:** 1588                      **Organization:** State of Wyoming- Department of State Parks and Cultural Resources

**Comment ID:** 129800            **Organization Type:** State Government

**Representative Quote:** Keep Sylvan Pass and the East Entrance of Yellowstone Open: The East Entrance provides important access to Yellowstone National Park for northeast Wyoming residents and visitors to the Cody area. Closure of Sylvan Pass would in essence close this entrance other than to localized non-motorized travel. This would be extremely detrimental to winter tourism in Park County, Wyoming. We therefore encourage NPS to pursue ways to partner with entities in Park County to keep Sylvan Pass open during the winter season.

The importance and high degree of the public support for NPS keeping this route open is demonstrated by the (rare) joint comment letter on the past Draft EIS sent to NPS by the Wyoming Congressional Delegation. This letter expresses strong concerns and states, "Simply states, the preferred alternative closes the East Entrance of Yellowstone National Park to motorized snowmobile and snowcoach access. This decision is unacceptable to us and our constituents, and we strongly urge the NPS to reconsider closure of the East Entrance as the Draft EIS moves toward a Record of Decision (ROD)".

**Corr. ID:** 1588                      **Organization:** State of Wyoming- Department of State Parks and Cultural Resources

**Comment ID:** 129629            **Organization Type:** State Government

**Representative Quote:** 5. Keep Sylvan Pass Open - we believe it is important that winter access to Yellowstone's interior continue to be available from the park's East Entrance. This entrance is extremely important to visitors and especially those from Park County Wyoming.

**Corr. ID:** 1589                      **Organization:** Montana Fish, Wildlife, and Parks

**Comment ID:** 129840            **Organization Type:** State Government

**Representative Quote:** Maintain the East entrance as open in balance with the cost of maintaining public safety at Sylvan Pass.

**Corr. ID:** 1656                      **Organization:** Board of County Commissioners for Park County, Wyoming

**Comment ID:** 129973            **Organization Type:** State Government

**Representative Quote:** Continue to keep the East Entrance open to snowmobiles and snowcoaches. Park County has recently sponsored grants and otherwise contributed to the Sleeping Giant Ski Area project on the Northfork of the Shoshone River. The Sleeping Giant Ski Area opened for business in 2009-2010 heralding a return of the kind of vibrant winter economy on the Northfork that existed in the past. Recreational snowmobile use through the East Gate is an essential element in this revitalization.

**Concern ID:** 23647

**CONCERN STATEMENT:** One commenter requested that the plan/EIS evaluate the cost associated with managing Sylvan Pass in the winter, as well as safety issues.

**Representative Quote(s):** **Corr. ID:** 1582 **Organization:** National Parks Conservation Association  
**Comment ID:** 129873 **Organization Type:** Non-Governmental

**Representative Quote:** As the National Park Service develops the Environmental Impact Statement for Winter Use in Yellowstone National Park, NPCA asks for a full review and analysis of the management of Sylvan Pass and the East Entrance to Yellowstone National Park. This analysis should include a review of: costs associated with managing Sylvan Pass in winter and human safety issues associated with howitzer bombing and avalanche controls in and around Sylvan Pass.

**Concern ID:** 23648

**CONCERN STATEMENT:** Commenters suggested that the concerns to close Sylvan Pass due to avalanche concerns were not founded.

**Representative Quote(s):** **Corr. ID:** 1523 **Organization:** Wyoming Legislature  
**Comment ID:** 128288 **Organization Type:** Unaffiliated Individual

**Representative Quote:** RISK

YNP cannot reasonably claim that the "risk" on Sylvan Pass is an unacceptable level of risk that cannot be managed and mitigated; especially now in light of the February 13, 2007 avalanche hazard assessment and mitigation report, the Sylvan Pass Study Group report and the safe operation of the pass over the last 2 winters. Managing the hazard does not mean eliminating the risk.

**Corr. ID:** 1523 **Organization:** Wyoming Legislature  
**Comment ID:** 128289 **Organization Type:** Unaffiliated Individual

**Representative Quote:** PREDICATABLE AND CONSISTENT ACTIONS

Park County is not demanding that Sylvan Pass be kept open at all times! Traditional avalanche mitigation and road maintenance on the Pass has always resulted in closures but they have been predictable and consistent because of predictable and consistent avalanche mitigation programs - that is before Helicopter missions became part of the program during winter 2004/2005. Since 2004 the sylvan pass avalanche mitigation program has not been predictable and consistent.

**Corr. ID:** 1523 **Organization:** Wyoming Legislature  
**Comment ID:** 128287 **Organization Type:** Unaffiliated Individual

**Representative Quote:** - There are many other viable explosive delivery alternatives for Sylvan Pass. However, YNP employees are no longer allowed to handle hand charges. A safe hand charge route could originate from the woods on the west side of the avalanche paths on Sylvan Pass and access the ridge above the starting zones. This well-defined route is not exposed to avalanche hazards. A change in park policy and proper training would enable YNP personnel to safely deploy hand charges to many of the starting zones

before they cross beneath these avalanche paths on the way to the gun mount.

**AL6010 - Alternatives: Oppose Snowmobiles Using Sylvan Pass and East Entrance**

**Concern ID:** 23649

**CONCERN STATEMENT:** Commenters requested that the plan/EIS include an alternative that closes Sylvan Pass and the East Gate due to health and safety issues, as well as environmental impacts.

**Representative Quote(s):** **Corr. ID:** 134 **Organization:** *Not Specified*

**Comment ID:** 129263 **Organization Type:** Unaffiliated Individual

**Representative Quote:** I would like to see Sylvan Pass closed in the winter due to avalanche danger and lack of use. It seems absurd to do avalanche control in a national park, not to mention a waste of money and risk to humans.

**Corr. ID:** 191 **Organization:** *Not Specified*

**Comment ID:** 129475 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Regarding the roads over Sylvan Pass and Dunraven Pass, these should both be closed/remain closed in winter. If the EIS considers any options that entail continued oversnow vehicle usage over Sylvan, then it needs to provide the public with a truthful estimate of the cost of keeping the East Entrance Road open to oversnow vehicles in winter. The EIS should also compare the costs of opening and maintaining Cooke Pass for year-round travel to that of keeping open Sylvan Pass for oversnow travel. In this manner, the public will be able to see just how much the State of Wyoming is fleecing the NPS to maintain unsafe and questionable travel over a pass that never should have been opened in the first place.

**Corr. ID:** 321 **Organization:** *Not Specified*

**Comment ID:** 126451 **Organization Type:** Unaffiliated Individual

**Representative Quote:** In addition to the suggested alternative limiting access corridors from the South and West entrances to Old Faithful, alternatives closing the East Entrance and Sylvan Pass to oversnow vehicles should be displayed. There is ample justification in doing so including risk to employees and visitors, environmental impacts from the use of explosives detonated on National Park lands, visual and environmental impact from gun emplacement and access road and costs to maintain the avalanche control and grooming programs.

**Corr. ID:** 920 **Organization:** ANPR

**Comment ID:** 127372 **Organization Type:** Unaffiliated Individual

**Representative Quote:** An example of where you might apply this is in the decision on whether or not to keep the east entrance through Sylvan Pass open during the winter. As I understand it, extensive avalanche forecasting and control efforts for less than 10 visitor per day can hardly be viewed as acting in "long-term public interest" of those NPS employees who must engage in this dangerous work, of taxpayers that must pay substantial amounts of their tax dollars for very little public enjoyment, and of park resources that are impaired by howitzer shots being fired to induce avalanches that then must be cleared by heavy equipment.

**Corr. ID:** 1503 **Organization:** *Not Specified*

**Comment ID:** 128464 **Organization Type:** Unaffiliated Individual

**Representative Quote:** DISCONTINUE any access from the East Entrance. How can the cost of hundreds of thousands of dollars to keep open a corridor that less than 400 people use all winter long be justified? It makes no economic sense. People will have to plan trips that originate from other entrances. There could be a lot more patrolling of the plowed corridors of the park if that money was put to personnel instead of avalanche control on a little used corridor.

**Corr. ID:** 1584                      **Organization:** *Not Specified*

**Comment ID:** 129622              **Organization Type:** Unaffiliated Individual

**Representative Quote:** 4. Consider an option to halt Sylvan Pass OSV use in favor of opening the final distance of Chief Joseph highway into Cooke City for wheeled vehicles.

### **AL6020 - Alternatives: Best Available Technology (BAT)**

**Concern ID:** 23650

**CONCERN STATEMENT:** Commenters provided general support for BAT requirements for OSV operating in the park.

**Representative Quote(s):** **Corr. ID:** 147                      **Organization:** Cascades Mountaineers and Central Oregon Nordic Club

**Comment ID:** 128332              **Organization Type:** Unaffiliated Individual

**Representative Quote:** Establish noise and pollution limits on coaches well below impact levels.

**Corr. ID:** 783                      **Organization:** *Not Specified*

**Comment ID:** 127147              **Organization Type:** Unaffiliated Individual

**Representative Quote:** Be sure they use BAT snowmobiles.

**Corr. ID:** 854                      **Organization:** *Not Specified*

**Comment ID:** 127479              **Organization Type:** Unaffiliated Individual

**Representative Quote:** I believe that use of snowmobiles should be further minimized and those which are allowed should be of the highest technological level to minimize noise.

**Corr. ID:** 940                      **Organization:** *Not Specified*

**Comment ID:** 127842              **Organization Type:** Unaffiliated Individual

**Representative Quote:** Another recommendation I suggest is that you mandate that any and all snowmobiles and snowcoaches by modernized vehicles to restrict the pollution. In other words, no older models allowed at all. The vehicles would need to be inspected before their use is permitted.

**Corr. ID:** 1275                      **Organization:** SnoWestOnline

**Comment ID:** 128193              **Organization Type:** Unaffiliated Individual

**Representative Quote:** I think it can honestly be said that the impact snowmobilers are having on the Yellowstone environment has been profoundly reduced through the mandated use of "Best Available Technology". There is clearly no comparison at all to current 4-stroke engines vs. the older 2-strokes that most people associate with snowmobiling. The snowmobiling community has adapted to the park services demands that restrict all but the most environmentally friendly sleds from access, it only seems

fair that having made the investment in these new sleds that they continue to be admitted into the park.

**Corr. ID:** 1557                      **Organization:** Fremont County Parks and Recreation

**Comment ID:** 129124            **Organization Type:** County Government

**Representative Quote:** To Whom It May Concern:

I write this letter on behalf of Fremont County Parks and recreation asking for your consideration:

To continue including BAT and, in designated areas, non-BAT snowmobiles as part of the "over snow vehicles" being considered as part of the Yellowstone Winter Use Plan/EIS.

**Corr. ID:** 1589                      **Organization:** Montana Fish, Wildlife, and Parks

**Comment ID:** 129835            **Organization Type:** State Government

**Representative Quote:** Allow only OSVs manufactured with or retrofitted to require the Best Available Technology (BAT) as referred to in the 2008 EA to minimize air quality and noise impacts from over snow vehicle usage.

**Concern ID:** 23651

**CONCERN STATEMENT:** Commenters requested that BAT requirements for snowcoaches be included in the Winter Use Plan. Specific suggestions included noise, weight, and size limits for snowcoaches.

**Representative Quote(s):** **Corr. ID:** 2                      **Organization:** CNPSR NPCA

**Comment ID:** 126964            **Organization Type:** Unaffiliated Individual

**Representative Quote:** Snowcoaches, themselves, should be upgraded to cleanest, quietest technology available, as soon as possible.

**Corr. ID:** 5                          **Organization:** *Not Specified*

**Comment ID:** 126972            **Organization Type:** Unaffiliated Individual

**Representative Quote:** I would also like to see limits on weight of snowcoaches and BAT requirements for snowcoaches to be put into play. Did you know, the new Xanterra snowcoaches weight 14700 pounds empty, with 200 pound tracks on all four, capability to carry 14 passengers, and around 50 gallons of diesel. Fully loaded, the vehicle may weigh 9 tons. This is nearly 3 tons more than your standard snowcoach. They tear up the roads, making the park dangerous for both snowmobiles and other snowcoaches. I would like to see them banned on basis of excessive weight.

**Corr. ID:** 371                      **Organization:** please uncheck member

**Comment ID:** 126659            **Organization Type:** Unaffiliated Individual

**Representative Quote:** In my perfect world, there would be no snowmobiles allowed in Yellowstone, only BAT snow coaches. I thought it important to make this statement, though I am willing to compromise as stated above. But... 318 is the maximum.

**Corr. ID:** 1194                      **Organization:** *Not Specified*

**Comment ID:** 128143            **Organization Type:** Unaffiliated Individual

**Representative Quote:** Switching to snowcoaches alone should only be done if snowcoaches are retrofitted or newly manufactured to meet BAT specifications, including decibel and emissions level requirements. Many of the snowcoaches currently used in the park are ancient, use as much gas per passenger (or more) than snowmobiles,

and are responsible for the majority of loud motorized sounds in the park. Additionally, snowcoaches disturb wildlife, and present a larger visual presence than snowmobiles. However, I understand that my suggestion of completely non-motorized use in the park is likely not to happen, therefore, BAT equipped snowcoaches, and a limited number of them, is the best motorized option.

**Corr. ID:** 1473                      **Organization:** International Snowmobile Manufacturers Association

**Comment ID:** 128806            **Organization Type:** Unaffiliated Individual

**Representative Quote:** 5. We would recommend consideration be given to the weight and size limit of snow coaches, which are allowed to enter the park. The overly large snow coach operating in the park this past winter unduly created some safety issues and caused deep ruts in the snow. This large existing snow coach constitutes a serious issue for the Park Service to review and reconsider.

**Corr. ID:** 1514                      **Organization:** *Not Specified*

**Comment ID:** 128423            **Organization Type:** Unaffiliated Individual

**Representative Quote:** Snowcoach only access:

- All plans should require Snowcoaches to meet an emission and sound BAT requirement. Currently, Xantera Bombardiers release more pollutant emissions than the current models of BAT snowmobiles. Many of the current models of snowcoaches have sound levels that are above what the National Park Service draft noise restriction levels. Standards that are reasonable, defensible, and achievable need to be established for snowcoaches.

**Corr. ID:** 1516                      **Organization:** Oregon State Snowmobile Association

**Comment ID:** 128364            **Organization Type:** Unaffiliated Individual

**Representative Quote:** In respect to snowcoaches, BAT needs to apply universally to all coaches just as it has for several years now for commercial snowmobiles. However snowcoach BAT needs to go beyond just sound and emissions and also set maximum limits on coach's weight and overall size. As we commented earlier, some of the current 'new coaches' are too large to be safely operated on the Park's snow roads since they create deep ruts and overwhelm the trail. All snowcoach alternatives need to establish a maximum coach size equivalent to a 15-passenger van conversion. Existing large coaches should not be grandfathered-in past the expiration date of their existing contracts since this is such a severe road maintenance and visitor safety issue.

**Concern ID:** 23652

**CONCERN STATEMENT:** One commenter suggested that zero emissions snowmobiles be permitted in the park.

**Representative Quote(s):** **Corr. ID:** 389                      **Organization:** *Not Specified*

**Comment ID:** 126689            **Organization Type:** Unaffiliated Individual

**Representative Quote:** The biggest loss in jobs in that area was caused removing snowmobiles, we have the technology to enjoy the park in the winter which is when Yellowstone is at it best. Bring jobs back to the park and allow snowmobiles to ride in the park again! Allow the use on zero emission vehicles. People will buy whatever you tell them to so they can visit this park in the winter.

**Concern ID:** 23653

**CONCERN STATEMENT:** Commenters suggested that any EPA Compliant snowmobile be considered BAT.

**Representative Quote(s):** **Corr. ID:** 179 **Organization:** *Not Specified*

**Comment ID:** 129236 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Allow new 2 stroke EPA compliant snowmobiles in the parks.

**Corr. ID:** 1341 **Organization:** *Not Specified*

**Comment ID:** 127263 **Organization Type:** Unaffiliated Individual

**Representative Quote:** . Noise and emissions are being mandated by the EPA-2012 are the most restrictive and if your snowmobile meets the 2012 standards you should be allowed in the Park.

**Corr. ID:** 1440 **Organization:** *Not Specified*

**Comment ID:** 128993 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Under Yellowstone National Park's current Environmental Impact Statement (EIS) plan 318 snowmobiles led by commercial guides, under "best available technology" (BAT) are allowed into the park per day (Yellowstone National Park). Best available technology snowmobiles are certified by the Environmental Protection Agency (EPA) to be allowed into the park because they are technologically advanced to protect the environment. For example, the average 2-stroke snowmobile puts out 150 hydrocarbons, and 400 carbon monoxide g/kW-hr into the air, and 78 A-weighted decibels in sound emissions. However, a 2002 BAT Arctic Cat 4-Stroke Touring puts out only 6.20 hydrocarbons and 79.95 carbon monoxide g/kW-hr into the air, and 71.3 dBA in sound emissions. (National Park Service) In hydrocarbons that is a difference of 143.8 g/kW-hr, in carbon monoxide that is a difference of 320.05 g/kW-hr, and in dBA sound emissions a difference of 6.8! In air emissions about 14, 2002 BAT Arctic Cat 4-Stroke Touring would equal one average 2-stroke snowmobile. A small passenger car puts out 4.2 carbon monoxide grams per mile, if you're driving 20 miles per hour that would equal 84 g/hr as compared to a 2002 BAT Arctic Cat 4-Stroke Touring with only 79.95(EPA). These current standards are accepted by the EPA and were approved by the EIS; major governmental environment agencies are accepting these standards because they are reasonable for the environment.

**Corr. ID:** 1465 **Organization:** Governor, State of Wyoming

**Comment ID:** 128878 **Organization Type:** Unaffiliated Individual

**Representative Quote:** EPA Compliant Snowmobiles

Requiring 100% BAT snowmobiles in Yellowstone has had a significant impact on park visitation. While I do not question the fact that BAT snowmobiles have made an improvement to both the soundscape and air quality levels in the Park, technology is rapidly changing and new snowmobiles are becoming cleaner and quieter.

EPA regulations, going into effect in 2012, require all snowmachines manufactured in 2012 to meet EPA engine family regulations. The current EIS should include an analysis of a pilot program which would allow a limited number of EPA compliant snowmobiles to enter the park. Specifically, the NPS should analyze the potential of allowing a limited number of the visitors entering the Park non-commercially (via the Certified Group Leader Pilot Project) to use the cleaner and quieter 2012 EPA compliant snowmobiles.

**Corr. ID:** 1492 **Organization:** CNPSR et al

**Comment ID:** 128653 **Organization Type:** Unaffiliated Individual

**Representative Quote:** While the present planning process marks the culmination of all prior efforts, it also affords the National Park Service an opportunity to consider new

information regarding the potential impacts of various winter-use alternatives over the long-term. For instance, though park planners have previously relied on continued reductions in the noise and emissions of "best-available-technology" snowmobiles as justification for authorizing continued snowmobiling within Yellowstone, the environmental performance of the machines has actually worsened in recent years. At the same time, the Environmental Protection Agency's implementation of "Tier II" emissions standards for light-duty trucks and tightened emissions requirements for diesel engines has resulted in "best-available-technology" snowcoaches that outperform those identified as the least-impacting vehicles during prior NPS evaluations. This pattern of improving snowcoach performance and declining snowmobile performance, like other recent developments, provides the National Park Service with new and important insight into the long-term consequences of available winter-use alternatives. Accordingly, we urge the agency to undertake a renewed assessment of all potential options for managing winter use in Yellowstone--including access by "best-available-technology" snowcoaches.

**Corr. ID:** 1516

**Organization:** Oregon State Snowmobile Association

**Comment ID:** 128386

**Organization Type:** Unaffiliated Individual

**Representative Quote:** Just as Yellowstone winter use is night and day different today compared to pre-2000 winter use, EPA Compliant snowmobiles are also night and day different (both cleaner and quieter) than pre-EPA regulation era snowmobiles. Many 2-stroke snowmobiles today are actually cleaner than some 4-stroke snowmobiles. And while EPA regulations pointedly addressed snowmobile engine emissions, an accompanying result has been that EPA Compliant snowmobiles are now also inherently quieter than pre-regulation snowmobiles.

We believe EPA Compliant snowmobiles, in limited numbers, can be used to appropriately return a small degree of non-commercial access to the east side of Yellowstone. We suggest a pilot program be established which would allow perhaps up to 18 to 24 EPA Compliant Snowmobiles per day through both the east and south gates as part of groups led by Certified Leaders. This could be a starting point and, through Adaptive Management and monitoring, the Park would have the ability to adjust numbers up or down annually based upon its success. This approach would supplement, not replace, existing commercial snowmobile operations at these gates. And all that is being proposed as a starting point is a total of 36 to 48 EPA Compliant Snowmobiles park-wide on a trial basis through a pilot program - hardly a number which would overwhelm the experience like in the old days.

**Corr. ID:** 1559

**Organization:** Wyoming State Snowmobile Association

**Comment ID:** 129355

**Organization Type:** Recreational Groups

**Representative Quote:** EPA Compliant Snowmobiles: Requiring 100% BAT snowmobiles has had an adverse effect upon overall winter Park visitation, particularly through the east entrance and to a lesser degree through the south entrance. We believe a reasonable option in-between historic (unregulated) two stroke snowmobiles and requiring 100% BAT compliant snowmobiles in the Park would be to allow a very limited number of what we term "EPA Compliant Snowmobiles". For the purposes of this Winter Use Plan, we would specifically define EPA Compliant Snowmobiles as a "2012 model year or newer" snowmobile that meets EPA engine family (FEL) regulations. This would take full advantage of the snowmobile emission thresholds established by EPA standards since the full "phase-in" of their regulations will be complete with the 2010 model year (which will be on the market by fall 2011).

Just as Yellowstone winter use is night and day different today compared to pre-2000 winter use, EPA compliant snowmobiles are also night and day different (both cleaner and quieter) than pre-EPA regulation era snowmobiles. Many 2-stroke snowmobiles today are actually cleaner than some 4-stroke snowmobiles. And while EPA regulations



pointedly addressed snowmobile engine emissions, an accompanying result has been that EPA compliant snowmobiles are not also inherently quieter than pre-regulation snowmobiles.

We believe EPA compliant snowmobiles, in limited numbers, can be used to appropriately return a small degree of non-commercial access to the east side of Yellowstone. We suggest a pilot program be established which would allow perhaps up to 18 to 24 EPA Compliant Snowmobiles per day through both the east and south gates as part of groups led by Certified Leaders. This could be a starting point and, through Adaptive Management and Monitoring, the Park would have the ability to adjust numbers up or down annually based upon its success. This approach would supplement, not replace, existing commercial snowmobile operations at these gates. And all that is being proposed as a starting point is a today of 36 to 48 EPA Compliant Snowmobiles park-wide on a trial basis through a pilot program - hardly a number which would overwhelm the experience like in the old days.

**Corr. ID:** 1588

**Organization:** State of Wyoming- Department of State Parks and Cultural Resources

**Comment ID:** 129627

**Organization Type:** State Government

**Representative Quote:** 3. Bat/EPA: A realistic approach needs to be taken regarding snowmobile BAT regulations. All snowmobile alternatives should revisit the existing regulations that allow snowmobiles to be BAT certified based upon model year and age thereafter. This 6-year time limit was arbitrary when it was created and no information thus far proves that a snowmobile's BAT-worth extinguishes simple because they have turned six years old, so it is discriminatory to continue this rule for BAT snowmobiles. In respect to snowcoaches, BAT needs to apply universally to all coaches just as it has for several years now for commercial snowmobiles. However snowcoach BAT needs to go beyond just sound and emissions and also set maximum limits on coach's weight and overall size. As we commented earlier, some of the current 'new coaches' are too large to be safely operated on the Park's snow roads since they create deep ruts and overwhelm the trail. All snowcoach alternatives need to establish a maximum coach size equivalent to a 15-passenger van conversion. Existing large coaches should not be grandfathered-in past the expiration date of their existing contract since this is such a severe road maintenance and visitor safety issue.

**Corr. ID:** 1588

**Organization:** State of Wyoming- Department of State Parks and Cultural Resources

**Comment ID:** 129647

**Organization Type:** State Government

**Representative Quote:** BAT/EPA compliant Snowmobiles: Requiring 100% BAT snowmobiles has had an adverse affect upon overall winter Park visitation, particularly through the east entrance and to a lesser degree through the south entrance. We believe a reasonable option in-between historic (unregulated) two-stroke snowmobiles and requiring 100% BAT compliant snowmobiles in the Park would be to allow a very limited number of what we term "EPA Compliant Snowmobiles." For the purposes of this Winter Use plan, we would specifically define EPA Compliant Snowmobiles as a "2012 model year or newer" snowmobile that meets EPA engine family (FEL) regulations. This would take full advantage of the snowmobile emission threshold established by EPA standards since the full 'phase in' of their regulations will be complete with the 2012 model year (which will be on the market by fall 2011).

**Concern ID:**

23654

**CONCERN STATEMENT:** Commenters suggested that what constitutes BAT be revisited. Suggestions included allowing any 4-stroke snowmobile to qualify as BAT, as well as allowing all snowmobile of a certain age (models 5 years or newer for example) to qualify as BAT.

**Representative Quote(s):** **Corr. ID:** 743 **Organization:** *Not Specified*

**Comment ID:** 127054 **Organization Type:** Unaffiliated Individual

**Representative Quote:** If the NPS can't eliminate their use, it should do all it can to mitigate the adverse effects of these vehicles.

1. Allow only 4 cycle engines. (2 cycle engines are very dirty.)
2. Limit the noise that each machine can emit.
3. Limit the number of snowmobiles allowed in the park.

**Corr. ID:** 979 **Organization:** *Not Specified*

**Comment ID:** 128114 **Organization Type:** Unaffiliated Individual

**Representative Quote:** support an alternative to keep the "Best Available Technology" (BAT) requirement, whether it be four stroke or two stroke technology. Current build two stroke snowmobiles (models 2010 and later) have lowered their emissions and in some cases better than a four stroke. When considering this alternative the BAT should be considered whether four stroke or two stroke.

**Corr. ID:** 980 **Organization:** *Not Specified*

**Comment ID:** 128135 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Allow only 4 stroke machines to be used in the park. I understand and fully support the ban on 2 stroke machines. However there is a requirement of BAT (Best Available Technology) that is confusing and vague. Any stock (unaltered is the key here) 4 stroke machine should be allowed in the park given an inspection for NPS personnel and qualification of the rider.

**Corr. ID:** 1091 **Organization:** *Not Specified*

**Comment ID:** 127829 **Organization Type:** Unaffiliated Individual

**Representative Quote:** It for the most part is a joke if you look at summer usage. There are hundreds of thousands of cars and motorcycles allowed daily in the summer. As long as you have a BATT snowmobile with stock exhaust go for it on the park roads in the winter just as before. I ride a stock 4 stroke snowmobile that is far less noisy than a open piped Harley or a monster diesel 1 ton pulling a 40 foot 5th wheel. I am sure the animals don't differentiate between seasons. Anyhow I am for BAT winter use in Yellowstone Park if any body asks

**Corr. ID:** 1443 **Organization:** Families for Outdoor Recreation

**Comment ID:** 128714 **Organization Type:** Unaffiliated Individual

**Representative Quote:** 10 I believe you should accept a sled that is 5 yr or newer to go thought the park because you have not shown any damage to the animals or land scrape and or the land or water from an older sled!

**Corr. ID:** 1516 **Organization:** Oregon State Snowmobile Association

**Comment ID:** 128362 **Organization Type:** Unaffiliated Individual

**Representative Quote:** BAT: As we touched on in our earlier comments on page 4, a realistic approach needs to be taken regarding snowmobile BAT regulations. All snowmobile alternatives should revisit the existing regulations that allow snowmobiles to be BAT certified based upon model year and age thereafter. This 6-year time limit was arbitrary when it was created and no information thus far proves that a snowmobile's BAT-worth extinguishes simply because they have aged 6 years. There was a vision by the Park that BAT models would continue to evolve dramatically (improved BAT), but that didn't happen and is unlikely to happen due to the relatively small number of snowmobiles needed to fulfill current snowmobile visitation limits. Other vehicle types are not banned from Yellowstone simply because they have turned six years old, so it is

discriminatory to continue this rule for BAT snowmobiles.

**Corr. ID:** 1526                      **Organization:** Brigham Young University-Idaho

**Comment ID:** 129431            **Organization Type:** University/Professional Society

**Representative Quote:** know that the issue of whether or not snowmobiles should be banned from Yellowstone originally began because some people believed that the machines harmed the environment and threatened the wildlife. However, this claim is no longer accurate. Technology has advanced. Recently, in the past few years, the engineering of snowmobiles has drastically evolved and we are now able to build eco-friendly 4-stroke snowmobiles. These machines now have built-in microchips that allow them to be more fuel-efficient and because of this new technology, much less toxic emissions are being released into the atmosphere. Do we need to limit snowmobiles like these from the park?

**Corr. ID:** 1531                      **Organization:** Cody Country Chamber of Commerce

**Comment ID:** 129381            **Organization Type:** Town or City Government

**Representative Quote:** Best Available Technology

We recommend that you assess allowing all Best Available Technology snowmobiles access to the Park, regardless of year of manufacture. This allows for greater equipment flexibility and higher return on investment on the part of guided snowmobile tour operators. This would still allow the objectives of protecting naturally occurring background sound levels and minimizing loud noises and minimizing impacts by air pollution.

**Corr. ID:** 1541                      **Organization:** *Not Specified*

**Comment ID:** 129146            **Organization Type:** Unaffiliated Individual

**Representative Quote:** 5. Concern regarding the noise and air pollution of previous two-stroke technology have been addressed by an unprecedented effort by industry in the development of Park Service-approved four-stroke snowmobiles. Furthermore, Bombardier Ski Doo has developed two-strokes (E-Tech engines) that exceed current Best Available Technology standards set by the Park Service. This can all be confirmed with the hard data from your own research.

**Corr. ID:** 1648                      **Organization:** Utah Snowmobile Association

**Comment ID:** 129914            **Organization Type:** Civic Groups

**Representative Quote:** Along with the requirement for utilizing a commercial guide for accessing the park, the other most onerous requirement that prevents Utah riders from enjoying YNP is the outdated Best Available Technology ("BAT") rule. The NPS needs to relook at its BAT Requirement due to the technology advancements included in model years beyond 2010. Two-stroke sleds are now available that actually have lower emissions than four-stroke snowmobiles and are similar in sound output. Any final Winter Use Plan should capitalize on this technology.

**Concern ID:** 23655

**CONCERN STATEMENT:** Commenters requested that an exemption from BAT and guiding requirements on Cave Falls Road be carried throughout the alternatives. An exemption from these requirements specifically on Grassy Lake Road to Flagg Ranch was also requested.

**Representative Quote(s):** **Corr. ID:** 1202                      **Organization:** Idaho Department of Parks & Recreation

**Comment ID:** 126536            **Organization Type:** Unaffiliated Individual

**Representative Quote:** The exemption from the BAT and guiding requirements on the Cave Falls Road should be carried through the range of alternatives. Cave Falls is a short 1-mile road in the Southwest corner of YNP. Snowmobiling is the only reasonable access into Cave Falls during the winter. This location receives relatively little use compared to other features in the park. It also gives visitors the opportunity to view water features in relative solitude. If the access is eliminated, it will eliminate all but the hardest of park visitors going to Cave Falls in the winter.

**Corr. ID:** 1202                      **Organization:** Idaho Department of Parks & Recreation

**Comment ID:** 126537              **Organization Type:** Unaffiliated Individual

**Representative Quote:** The current winter use rule in Sec 7.21. 5 (iv) allows non-BAT snowmobiles originating in the Targhee National Forest to travel on the Grassy Lake Road to Flagg Ranch. The BAT exemption on this road is very important because snowmobilers at Grassy Lake Reservoir have to travel much further to the trailhead, than to Flagg Ranch.

It is approximately 8 miles from Grassy Lake Reservoir to Flagg Ranch. The distance between the Reservoir and the Trailhead is 27 miles and an additional 14 miles to Ashton. In the event of a winter storm or other emergency, Flagg Ranch is the nearest shelter or source of help along the eastern end of the road. We encourage the NPS to keep this provision in the range of alternatives for the winter use plan process.

**Corr. ID:** 1557                      **Organization:** Fremont County Parks and Recreation

**Comment ID:** 129126              **Organization Type:** County Government

**Representative Quote:** To continue at current, or increase use levels, non-BAT snowmobiles from the Grassy Lake Reservoir to Flagg Ranch. The Flagg Ranch Trail, by way of Fremont County, continues to be a popular destination site for both day use and those riders seeking overnight accommodations. The trail is groomed on a weekly basis by Fremont County at no cost to the State of Wyoming or NPS. Due to the distance it is necessary, in most cases, for snowmobilers and the trail grooming equipment coming from Idaho, to refuel at Flagg Ranch. It would be difficult to continue access to the popular Grassy Lakes Reservoir or Jack Ass Loop sites without the opportunity to refuel. Safety for riders would also come into questions without access to the facilities at Flagg Ranch.

Thank you for your time and consideration in this matter.

**Corr. ID:** 1557                      **Organization:** Fremont County Parks and Recreation

**Comment ID:** 129125              **Organization Type:** County Government

**Representative Quote:** To continue unlimited access to non-BAT snowmobilers to the Cave Falls area in Yellowstone's southwest corner. Currently the access to Cave Falls is through Fremont County where the snowmobile trail is groomed 2-3 times per month. This area continues to grow in popularity with day use riders. It is a low maintenance site with no facilities necessary which provides a basic day drive. Given the short distance with YNP boundaries from the Targhee National Forest to Cave Falls, law enforcement may become a difficult situation at this particular site without continued approved non-BAT snowmobile access to continue winter use of this scenic site would require approximately one mile of access into National Park boundaries.

**Concern ID:** 23656

**CONCERN STATEMENT:** Commenters suggested that BAT should not be included in the Winter Use Plan, with some feeling that it is too expensive of a requirement.

**Representative Quote(s):** **Corr. ID:** 110 **Organization:** *Not Specified*  
**Comment ID:** 126930 **Organization Type:** Unaffiliated Individual  
**Representative Quote:** As a child and teen, I used to go through with my family on snowmobiles at least one time per winter season. With the requirement for guides and BAT, we can no longer afford to do so.  
**Corr. ID:** 954 **Organization:** *Not Specified*  
**Comment ID:** 127581 **Organization Type:** Unaffiliated Individual  
**Representative Quote:** Affordability for the general public needs to be weighed more so than stricter BAT. Stricter BAT drives up costs and causes the average family to go else where on vacation.  
**Corr. ID:** 1390 **Organization:** *Not Specified*  
**Comment ID:** 127136 **Organization Type:** Unaffiliated Individual  
**Representative Quote:** Best technology requirements are not appropriate for the winter use plan. Snowmobiles pollute far less than the thousands of automobiles that visit the park each year.  
**Corr. ID:** 1487 **Organization:** *Not Specified*  
**Comment ID:** 128521 **Organization Type:** Unaffiliated Individual  
**Representative Quote:** BAT equipment is important, particularly in the commercial operations. However, the small number of private snowmobiles should not be required to be BAT.

**Concern ID:** 23657

**CONCERN STATEMENT:** Commenters requested that EPA compliant snowmobiles be allowed on the Continental Divide Trail and on Jackson Lake.

**Representative Quote(s):** **Corr. ID:** 1588 **Organization:** State of Wyoming- Department of State Parks and Cultural Resources  
**Comment ID:** 129628 **Organization Type:** State Government  
**Representative Quote:** 4. EPA - Compliant Snowmobiles on the Continental Divide Snowmobile Trail (CDST) and Jackson Lake - It is important that EPA-compliant Snowmobiles be allowed on the CDST and on Jackson Lake (rather than requiring all BAT snowmobiles) to help restore a viable level of winter visitation to Grand Teton, the Parkway, and Jackson Lake.  
**Corr. ID:** 1588 **Organization:** State of Wyoming- Department of State Parks and Cultural Resources  
**Comment ID:** 129646 **Organization Type:** State Government  
**Representative Quote:** In the 2007 comments we supported the Wyoming State Snowmobile Associations (WSSA) beliefs that there were three severely detrimental flaws within proposed management prescriptions that could be harmful for successful and sustainable long-term management of these parks. These damaging flaws include: 1) requiring 100% of the snowmobile groups within Yellowstone to be commercially guided since it is excessive and unreasonable regulation that has decimated visitation levels, 2) requiring that all snowmobiles operated on the Continental Divide Snowmobile Trail (CDST) and Jackson Lake within Grand Teton and the Parkway be a Best Available Technology (BAT) snowmobile since it is unreasonable given the low historic use numbers and the fact that the CDST is immediately adjacent to a plowed highway with concurrent automobile, truck, and bus traffic, and 3) closure of Sylvan Pass to all

motorized vehicle traffic since this would unduly eliminate important access to the park from the Cody region of Wyoming. We therefore ask that you consider an alternative(s) that blends several pieces of past alternatives together to reflect the following:

**Concern ID:** 23658

**CONCERN STATEMENT:** Commenters stated that the soundscape needed to be improved to comply with the 1974 plan, which would include noise from individual snowmobiles and snowcoaches.

**Representative Quote(s):** **Corr. ID:** 1590 **Organization:** Montana Department of Environmental Quality

**Comment ID:** 129850 **Organization Type:** State Government

**Representative Quote:** To preserve or improve this soundscape resource and comply with the 1974 plan (use of OSV is consistent with year-round management), more work is needed with respect to noise from individual snowmobiles and snowcoaches.

**Concern ID:** 23659

**CONCERN STATEMENT:** One commenter requested that all snowmobiles be 4-stroke, with no exceptions.

**Representative Quote(s):** **Corr. ID:** 844 **Organization:** Not Specified

**Comment ID:** 127413 **Organization Type:** Unaffiliated Individual

**Representative Quote:** I would like to see better exhaust systems to keep our footprint smaller. I would also like to see a zero tolerance policy on 2-strokes in the park. During one of my last tours I saw two employees from a Jackson snowmobile company riding 2-strokes. After asking the ranger about it I learned they were retrieving a broke down sled and had permission to enter on 2-strokes. The sound difference was noticeable and I feel it took away from my guest's experience.

### **AL6030 - Alternatives: Specific suggestions for a new OSV limit/level**

**Concern ID:** 23660

**CONCERN STATEMENT:** Commenters suggested that the OSV cap be revised to allow more than the current level of use. Specific suggestions included:

- 1,000 per day
- 425 snowmobiles and 50 coaches
- 520 snowmobiles
- 700 snowmobiles
- 540 snowmobiles, 78 snowcoaches
- 720 to 540 snowmobiles
- 720 snowmobiles (with 25% non-commercially guided)
- 490 snowmobiles
- 500 snowmobiles
- Average number of machines in 2002 at each entrance, divided by 2
- 350 to 450 snowmobiles
- 750 snowmobiles
- 750 to 950 snowmobiles
- 1,400 (25% private)
- 800 to 1,000 snowmobiles
- 1,500 snowmobiles
- 600 snowmobiles

- Representative Quote(s):** **Corr. ID:** 13 **Organization:** *Not Specified*
- Comment ID:** 127719 **Organization Type:** Unaffiliated Individual
- Representative Quote:** Snowmobiles should be capped at 1000 per day, using BAT, which includes some of the new two-stroke engines.
- Corr. ID:** 250 **Organization:** *Not Specified*
- Comment ID:** 126901 **Organization Type:** Unaffiliated Individual
- Representative Quote:** We feel that the number of snowmobiles allowed in should not be capped. If a cap is a must then it should be at least 1,500 a day & groups should be able to make reservations at least a year in advance.
- Corr. ID:** 961 **Organization:** *Not Specified*
- Comment ID:** 127629 **Organization Type:** Unaffiliated Individual
- Representative Quote:** Allow 425 snowmobiles and 50 snowcoaches
- Corr. ID:** 1223 **Organization:** *Not Specified*
- Comment ID:** 126352 **Organization Type:** Unaffiliated Individual
- Representative Quote:** I would like you to keep the park open to 600 snowmobiles a day. Allow 250 in the West Entrance, 200 in the North Entrance, 75 in the East entrance and 75 in the South Entrance.
- Corr. ID:** 1341 **Organization:** *Not Specified*
- Comment ID:** 127264 **Organization Type:** Unaffiliated Individual
- Representative Quote:** If the entire road system is groomed, the Park can handle at least seven hundred snowmobiles per day without seeming crowded. (Unlike the mobs of summer!)
- Corr. ID:** 1388 **Organization:** Fugowee Snowmobile club
- Comment ID:** 127227 **Organization Type:** Unaffiliated Individual
- Representative Quote:** We are asking you once again to please reconsider the number of riders in a day. In an area as large as YNP 800 - 1000 sleds a day is not an unmanageable number
- Corr. ID:** 1434 **Organization:** *Not Specified*
- Comment ID:** 129061 **Organization Type:** Unaffiliated Individual
- Representative Quote:** In conclusion; the recent science on every topic monitored by the NPS relating to winter use supports recreational guided snowmobiles in Yellowstone with a daily snowmobile cap above 540 Park wide. This number should be included in the Draft EIS as your preferred alternative. It is a number that ensures the park resources are protected and is good for the visiting public, the gateway communities, the employees, and the concessionaires.
- Corr. ID:** 1514 **Organization:** *Not Specified*
- Comment ID:** 128408 **Organization Type:** Unaffiliated Individual
- Representative Quote:** It appears to me that the existing "318" or the previous "540" interim plans have the most likely chance of implementation. Many years of monitoring data is now available for this type of mixed snowmobile/snowcoach use which enables the accurate modeling of the alternatives impact to wildlife, sound, air quality, and wilderness values in Yellowstone. Additionally, previous litigations have revealed what particular points of this alternative are most contentious and where more data may need

to be presented or collected.

**Corr. ID:** 1522                      **Organization:** Minnesota United Snowmobile Association

**Comment ID:** 128295              **Organization Type:** Unaffiliated Individual

**Representative Quote:** I also don't see an issue in allowing up to 750 snowmobiles in the park per day in the winter time. Statistically speaking, I think the week between Christmas and New Year's, and President's Day weekend are the busiest days anyway, with less than 750 snowmobiles per day in the park during this time, so there should be far less during the rest of the snowmobile season. The National Park Service has also made quite a bit of money from past snowmobile visitors.

**Corr. ID:** 1527                      **Organization:** *Not Specified*

**Comment ID:** 129164              **Organization Type:** Unaffiliated Individual

**Representative Quote:** 1. TAKE THE AVERAGE NUMBER OF SNOW MACHINES AND SNOW COACHES IN 2002, AT EACH ENTRACTE, DIVIDE BY 2 TO GET THE ALLOWABLE NUMBER TO ENTER THE PARK AND REQUIRE BAT MACHINES.

**Corr. ID:** 1529                      **Organization:** Wyoming State Representative

**Comment ID:** 129406              **Organization Type:** State Government

**Representative Quote:** I recommend that only new clean and quiet snow machines be allowed in the Park and that the number be the historical number of approximately 750. I further recommend that the snow coaches that are utilized in the winter to be as clean and as quiet as the snow machines are now. As long as the snow machines are guided and must stay on the appropriate groomed roads and trails, the historic number of snow machines should be allowed.

**Corr. ID:** 1560                      **Organization:** *Not Specified*

**Comment ID:** 129254              **Organization Type:** Unaffiliated Individual

**Representative Quote:** 3. I would like to see Park Officials use the good science they have compiled about winter use to come to snowmobile and snowcoach entry numbers that are both defensible and economically sustainable for the gateway communities. I cannot tell you what those numbers are but would hope that they snowmobile numbers are over 500 park wide and that through adaptive management the snowcoach numbers can increase.

**Corr. ID:** 1564                      **Organization:** *Not Specified*

**Comment ID:** 129197              **Organization Type:** Unaffiliated Individual

**Representative Quote:** And a fair number of snowmobiles entering the park could range from 750 to 950 daily and still be safe.

**Corr. ID:** 1583                      **Organization:** Yellowstone Arctic Yamaha

**Comment ID:** 129805              **Organization Type:** Business

**Representative Quote:** If you use 490 as the Park wide number, then the west gate would be allowed 245 machines per day based on historical percentages of the past. Therefore, 245 divided by the 8 west entrance concessionaires would give each concessionaire approximately 31 permits per day. Following along this same scenario and considering flexible or variable snowmobile daily limits, I would like the National Park Service to consider increased numbers for a certain number of days during the season and decreased numbers on equal number of days during the winter i.e., each concessionaire be allowed 10 additional permits (41 permits) for 20 days and 10 fewer permits (21 permits) per day for 20 days. Since the winter season is approximately 90 days long, we would have 20 days of increased use, 20 days of decreased use and 50



days at the normal 31 permits based upon the above scenario.

This plan or a similar scenario would allow businesses to be flexible and be able to take care of the visiting public as their reservations might demand. I understand that there may be concerns about everyone using their increased allotment on the same day. Historically, and because of the way groups and individuals make their reservations; it is not likely that there would be an increase of 80 machines on any one day.

Establishing daily caps based on historical averages is fallacious reasoning. If averages become the cap, the cap will eventually be near zero. Filling the last slot in an allocation is almost impossible. Many groups that don't fit into the remaining slots are turned away. Efforts to reschedule them to days with available slots are not always successful due to their travel itineraries. Multiply this problem by the number of operators in this town, and as history has proven, the gate counts have never been met. Multiply this same problem Park wide and the possibility of reaching the total quota is simply not possible. Therefore, whatever cap is placed on gates or Park wide is simply not achievable and causes an over exaggeration of the number of snowmobiles allowed into the park. Opponents of snowmobile access imply that whatever the cap is that there are that many snowmobiles in the park everyday all winter long. As we all know, that simply is not true. There must be flexibility to use more permits on certain days in order to achieve a greater percentage of actual use and better accommodate the visiting public as they desire.

**Corr. ID:** 1585

**Organization:** Office of the Governor, State of Wyoming

**Comment ID:** 129602

**Organization Type:** State Government

**Representative Quote:** Suggested Alternative

I ask that the NPS consider an alternative that analyses a daily limit of 720 snowmobiles a day, provides for 25% of those daily entries to be non-commercially guided, ensures that East Gate of Yellowstone remain open, consistent with the provisions in the Sylvan Pass Agreement, and considers allowing a percentage of EPA compliant snowmobiles. This alternative both maximizes public access while at the same time protects park resources.

720 Daily Limit

A daily limit of 720 snowmobiles per day is consistent with the daily average selected in the 2004 Temporary Rule EIS and is also consistent with Wyoming District Court Judge Clarence Brimmer's order for the 2008/2009 winter season. Both predictive modeling and actual on the ground monitoring have never found impairment of park resources at a limit of 720 snowmobiles per day in Yellowstone.

**Corr. ID:** 1586

**Organization:** *Not Specified*

**Comment ID:** 129592

**Organization Type:** Business

**Representative Quote:** For the benefit of the people, whether tourists; employees or operators the park should consider the domino effect of restricting the number of snowmobiles or snow coaches permitted each day. To say the least the experience of snowmobiling in Yellowstone provides an unparalleled inspirational experience for each individual and to have continued restricted access is unacceptable. The 318 number of allowable snowmobiles for the park has unfortunately meant that as operators we have had to turn a number of people away from being able to enjoy the special winter experience. We feel strongly that the number should be returned to a manageable number of 540 for snowmobiling and 78 for snow coaches making it viable for business owners to operate a business; as well as providing the opportunity for the visitors to enjoy the park.

**Corr. ID:** 1586                      **Organization:** *Not Specified*

**Comment ID:** 129593            **Organization Type:** Business

**Representative Quote:** Returning the allowable number of snowmobiles to 720-540 would also provide employment opportunities for local people - office help as well as professional guides. Our guides have been guiding tours from 10-30 years and pride themselves on the fact that they are able to provide guests with an enhanced appreciation of the Yellowstone Park Natural resources.

**Corr. ID:** 1591                      **Organization:** California - Nevada Snowmobile Association

**Comment ID:** 129908            **Organization Type:** Recreational Groups

**Representative Quote:** On the other hand, perhaps 318 is too low of a daily cap - or maybe it is in an appropriate ballpark if the entries are properly allocated so they can be utilized where there is a demand for them. We don't know the answer to that and hesitate to speculate what is right or wrong without having more data available to us. But what we do know is that it appears it will be difficult to sell anything above 500 to the DC court as long as they are involved in discussions and legal wrangling. And in the end, based upon lessons learned from experiences since 2004, it is likely that 350 to 450 snowmobile entries per day will be plenty sufficient if the existing rules stay unchanged. If any parts of the rules are relaxed, then discussions about larger numbers would be warranted - but if not, such arguments and discussions are an unproductive exercise which ultimately only tarnish the perception of snowmobiling in the Park.

**Corr. ID:** 1656                      **Organization:** Board of County Commissioners for Park County, Wyoming

**Comment ID:** 129974            **Organization Type:** State Government

**Representative Quote:** The Park Service should consider daily entries higher than 318. The Park Service has in the recent past found no unacceptable impacts from much higher numbers. While discretionary thresholds may have been exceeded with current use, certainly no impairment has been found with higher numbers. If the Park Service properly analyzes how public use is to be allowed in Yellowstone and adopts thresholds that properly reflect the practicalities of winter travel, the Park Service will be able to meet its obligations under the law and provide for greater recreational access.

The maximum daily number should be average rather than an absolute maximum. This would allow for daily numbers to be higher than the chosen number averaged with lower use days to arrive at the overall maximum number. Park County believes the daily entries should at 490.

**Corr. ID:** 1684                      **Organization:** *Not Specified*

**Comment ID:** 130179            **Organization Type:** Unaffiliated Individual

**Representative Quote:** INCREASE the number of machines allowed in the park on a daily basis to 1000.

**Concern ID:** 23662

**CONCERN STATEMENT:** Commenters suggested specific levels of snowcoach access they would like to see. Suggestions included:  
- 25 at the West entrance, 25 at the North entrance, 15 at the South entrance, and 10 at the East entrance  
- 12 snowcoaches per day

**Representative Quote(s):**    **Corr. ID:** 1223                      **Organization:** *Not Specified*

**Comment ID:** 126353      **Organization Type:** Unaffiliated Individual

**Representative Quote:** I would like to see more snow coach availability at each entrance. (I don't know the number that are currently allowed in the park.) I would like to see 25 at the West Entrance, 25 at the North Entrance, 15, at the South Entrance and 10 at the East entrance.

**Corr. ID:** 1553      **Organization:** *Not Specified*

**Comment ID:** 129004      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Also limit snow coaches to 12 per day.

**Concern ID:** 23664

**CONCERN STATEMENT:** One commenter suggested a range of alternatives that should be evaluated that would look at a range of use numbers. This range included current use, current peak use, more use than current and less use than current.

**Representative Quote(s):** **Corr. ID:** 1688      **Organization:** United States Environmental Protection Agency

**Comment ID:** 130291      **Organization Type:** Conservation/Preservation

**Representative Quote:** 1. Current Average Daily Use - utilizing the current vehicle fleet with the average daily numbers of snowcoaches and BAT snowmobiles per day from the past season or two. This will be important to establish baseline air quality conditions to serve as a basis for assessing the relative differences in impacts with other alternatives.

**Corr. ID:** 1688      **Organization:** United States Environmental Protection Agency

**Comment ID:** 130293      **Organization Type:** Conservation/Preservation

**Representative Quote:** 4. Higher than 2009 Use Level - An alternative with higher vehicle numbers than are currently operating (e.g., 540 snowmobiles and snowcoaches) with BAT, full commercial guiding and other available mitigation assessed in the Mitigated Current Allowable Peak Use alternative.

**Corr. ID:** 1688      **Organization:** United States Environmental Protection Agency

**Comment ID:** 130292      **Organization Type:** Conservation/Preservation

**Representative Quote:** 2. Current (2009) Allowable Peak Use - utilizing the current vehicle fleet (318 BAT snowmobiles/day and 78 snowcoaches per day). This alternative should assess the current mix of BAT snowmobiles and BAT/non-BAT snowcoaches using current mitigation requirements.

3. Mitigated Current (2009) Allowable Peak Use - (318 BAT snowmobiles/day and 78 snowcoaches per day). This alternative would allow direct comparison against Alternative 2 in assessing available mitigation to reduce remaining impacts (e.g., BAT for snowcoach emissions and noise and track impacts, improved grooming equipment and practices, distance or other requirements on guided groups to reduce wildlife disturbance, full BAT for all administrative vehicles). This mitigated current use alternative will demonstrate whether there is value in pursuing additional mitigation measures.

**Corr. ID:** 1688      **Organization:** United States Environmental Protection Agency

**Comment ID:** 130294      **Organization Type:** Conservation/Preservation

**Representative Quote:** 5. Lower than 2009 Use Level - An alternative that maximizes

the reduction in vehicle numbers while maintaining visitor numbers - specifically, a snowcoach-only alternative using BAT, full commercial guiding and other available mitigation assessed in the Mitigated Current Allowable Peak Use alternative.

**Concern ID:** 23665

**CONCERN STATEMENT:** Commenters offered suggestion for use levels at specific entrance points. Suggestions included:

- 30 daily entries at the East entrance
- 55% at the West entrance
- 50 daily entries at the East entrance

**Representative Quote(s):** **Corr. ID:** 257 **Organization:** *Not Specified*

**Comment ID:** 127657 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Please allow fifty sleds daily through the East Gate. This is a moderate number. It would afford us some reasonable on this side of the Park.

**Corr. ID:** 1575 **Organization:** Yellowstone Tour & Travel Summer and Winter

**Comment ID:** 129557 **Organization Type:** Business

**Representative Quote:** Please consider returning the West Entrance snowmobile entries to 55% as they were historically.

**Corr. ID:** 1656 **Organization:** Board of County Commissioners for Park County, Wyoming

**Comment ID:** 129972 **Organization Type:** State Government

**Representative Quote:** Daily entries at the East Entrance should be returned to 30. Demand for snowmobiling exists at this entrance as evidenced by past daily numbers as high as 50. Recent reductions in numbers are a reflection of, among other things, uncertain openings and the requirement that all entries be commercially guided.

**Concern ID:** 23667

**CONCERN STATEMENT:** Commenters requested that the Winter Use Plan consider numbers less than currently allowed, specifically looking at less than 200 OSV or less per day. Another suggested limiting use to 10 tours per day in the park, with 5 snowmobiles per tour.

**Representative Quote(s):** **Corr. ID:** 137 **Organization:** Greater Yellowstone Quarterly

**Comment ID:** 129402 **Organization Type:** Unaffiliated Individual

**Representative Quote:** I urge you and others to adopt a permanent plan that would limit daily, winter snowmobile use to a quota of 200 vehicles--or less.

**Corr. ID:** 703 **Organization:** *Not Specified*

**Comment ID:** 126880 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Please reduce the number of snowmobiles allowed into Yellowstone to a daily level of under 200 and restrict where they can ride so cross country skiers can enjoy the park with peace and quiet and view animals in an unharrassed environment.

**Corr. ID:** 746 **Organization:** HealThier Foundations

**Comment ID:** 127058      **Organization Type:** Unaffiliated Individual

**Representative Quote:** I would like to suggest a fairly restricted snow mobile use at the park in the winter. It is a lively hood for some and jobs are important. Specifically five snowmobiles per tour, 10 tours per day in the park.

I was in the park earlier this month and felt the traffic was too high, particularly for a low snow season.

**AL6040 - Alternatives: Separate OSV use by days**

**Concern ID:** 23670

**CONCERN STATEMENT:** One commenter suggested having specific snowmobile-free days.

**Representative Quote(s):**      **Corr. ID:** 1686      **Organization:** Not Specified

**Comment ID:** 130181      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Here's my suggestion: Have a few weeks, weekends or even days each winter that are snowmobile-free.

**AL6050 - Alternatives: Timed entry**

**Concern ID:** 23671

**CONCERN STATEMENT:** Commenters stated support for establishing timed entry into the park for OSV in order to address concerns related to the soundscapes.

**Representative Quote(s):**      **Corr. ID:** 1559      **Organization:** Wyoming State Snowmobile Association

**Comment ID:** 129351      **Organization Type:** Recreational Groups

**Representative Quote:** Group Size and Timing: We have commented in the past that the minimum snowmobile group size has been set too low, which encourage 'elite entries' where an individual or a couple hires a snowmobile guide to take them into the Park for their own exclusive trip. While this provides a degree of the 'individualized access' we advocate for, it is only for those who are rich enough to afford paying for 'their own group'. The real concern we have with this issue is that sound monitoring measures 'percent time audible' - so such small groups unnecessarily inflate the time snowmobile groups are audible. We believe it would be beneficial to establish a minimum snowmobile group size of 5 (guide plus 4 individuals/family members) to curtail elitism while also improving Park soundscapes.

We have also commented in the past in support of establishing 'timed entries' for snowcoaches and commercial snowmobile groups. Again, we believe that forcing a bit more bunching of some entries while also dispersing other entries away from peak times could ultimately decrease overall impacts upon Park soundscapes.

At least one alternative should consider increasing the minimum group size along with the potential benefits which could be gained from a timed entry system.

**Corr. ID:** 1591      **Organization:** California - Nevada Snowmobile Association

**Comment ID:** 129912      **Organization Type:** Recreational Groups

**Representative Quote:** We have also commented in the past in support of establishing 'timed entries' for snowcoaches and commercial snowmobile groups. Again, we believe that forcing a bit more bunching of some entries while also dispersing other entries away

from peak times could ultimately decrease overall impacts upon Park soundscapes.

At least one alternative should consider increasing the minimum group size along with the potential benefits which could be gained from a timed entry system.

**AL6060 - Alternatives: Other suggested alternatives/alternative elements**

**Concern ID:** 23672

**CONCERN STATEMENT:**

Commenters requested that the park add additional tours/programs related to OSV use include snowmobile tours that originate at Old Faithful, marketing the park as an educational destination, showing films related to the parks wildlife, hold "winter safaris", and having workshop retreats for artists.

**Representative Quote(s):** **Corr. ID:** 226                      **Organization:** *Not Specified*

**Comment ID:** 128055                      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Consider guided snowmobile tours that originate at Old Faithful.

**Corr. ID:** 390                      **Organization:** *Not Specified*

**Comment ID:** 126694                      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Another option to consider would be to allow snowmachine rentals/guides and snowcoaches at Old Faithfull for trips around the south and east side of the Park as far as Canyon. This area would allow for viewing of spectacular scenery and some wildlife, with probably the least effects on wildlife and other resources. This is the heavy snow area of the Park, and is easiest to groom without bare spots. This would help keep the Snow Lodge full, and keep the machines away from nordic skiers and others. You might also want to continue allowing snowmobiles from the South entrance to come to Old Faithful and Canyon. This creates some adjustments for the grooming program, but if you didn't have to groom from Madison Jct. to Canyon--you could save a LOT of expense, and other potential resource impacts from snowmachines or snowcoaches using that area. However--that area is the LEAST interesting for winter travel for many due to the lack of thermal features and wildlife. These options would increase access and the variety of uses available to a far wider number of the general public than the existing snowmobile/snowcoach-only options. It would also greatly reduce grooming costs--which might offset the road maintenance costs created by plowing.

**Corr. ID:** 632                      **Organization:** *Not Specified*

**Comment ID:** 126761                      **Organization Type:** Unaffiliated Individual

**Representative Quote:** However, I suggest keeping more of the existing structures open to house workshops and retreats for artists--who could be allowed wider use of snow coaches and snow shoes (only) to explore. The end result would be a faint footprint and minimal startup to win a rich multi-media documentation of one of the most beautiful places on planet earth--Yellowstone in the winter--recorded by some of the best artists in the world. More park ranger and housekeeping jobs converting to year-round positions would benefit staffing, and stimulate the local economy. Those who can't actually visit Yellowstone could revel in the great art! This art could, perhaps, be showcased in a gallery or show, creating another source of income and concomitant advertising for Yellowstone, while supporting the arts, overall.

**Corr. ID:** 1540                      **Organization:** *Not Specified*

**Comment ID:** 129202      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Ranger led sleigh (horse drawn) or snow shoe, dog sled; cross country ski groups to observe winter habitats for wildlife, tracking skills, etc.

Films of seasonal differences in specie adaption to season; food use/ statistics regarding herd size, viability of range available, cut off for culling need, etc.

No commercial skiing operations

Fireside chats, including settler era issues; dances / music / folk and poetry re: Yellowstone etc. and; National Parks Ken Burns films, etc.,

Shuttle access to Lodge / ancillary lower cost housing opportunities

And only shuttle access to geysers; geological interest spaces / wild life winter gathering spots

**Corr. ID:** 1671      **Organization:** *Not Specified*

**Comment ID:** 130130      **Organization Type:** Unaffiliated Individual

**Representative Quote:** I would like to see more school tours of Yellowstone. High school & community college students should be encouraged (targeted)by the NPCA to enjoy the wonder of Yellowstone as a part of their history or science courses.

**Corr. ID:** 1672      **Organization:** *Not Specified*

**Comment ID:** 130131      **Organization Type:** Unaffiliated Individual

**Representative Quote:** I believe that the Park could easily market to the students of the world as a packaged destination for educational purposes. Students could use a Yellowstone visit as the springboard for curriculum of science with tours and lodging, geography, politics (how our park system works) and then package the groups to Washington D.C. to finish their tour. The combination of rural park splendor and an international city, American History and museums would provide the best of both worlds for the young active mind.

**Corr. ID:** 1675      **Organization:** *Not Specified*

**Comment ID:** 130182      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Enhanced IMAX theaters at entrances to Yellowstone would provide education and demand respect for the wild found within the park beforehand and could provide a revenue stream for direct financial support via the implementation of a much needed monetary revenue stream for very logical reasons.

**Corr. ID:** 1676      **Organization:** *Not Specified*

**Comment ID:** 130134      **Organization Type:** Unaffiliated Individual

**Representative Quote:** I suggest a series of low-cost Winter Safaris for children and parents into the park with knowledgeable volunteer guides or park rangers. The panorama of natural wonders plus the up close and personal experience with wildlife is bound to give attendees a sense of support for our wilderness areas and popular park system.

Both education and public relations can be served through such a program not to mention an increase in financial support.

**Corr. ID:** 1677      **Organization:** *Not Specified*

**Comment ID:** 130135      **Organization Type:** Unaffiliated Individual

**Representative Quote:** As I mention below, I do not support the use of snowmobiles. I do feel, however, that excursions into this winter wonderland could be further appreciated if films were shown before or after the events. Wildlife filmed in the warmer seasons could be shown during the winter months to help familiarize the visitors with current "residents of the neighborhood".

**Concern ID:** 23674

**CONCERN STATEMENT:** Commenters requested that oversnow bikes be allowed at part of the Winter Use Plan.

**Representative Quote(s):** **Corr. ID:** 1502      **Organization:** Friends of Pathways

**Comment ID:** 128479      **Organization Type:** Unaffiliated Individual

**Representative Quote:** The recent invention of non-motorized snow-bicycles is an important opportunity that should be studied and included in the Winter Use Plan. These are bicycles specifically designed with wide low pressure tires that can easily travel over groomed snow surfaces. The snow-bikes are very low impact, and result in far less impact than a snowmobile or snowcoach. Snow-bicycles have a similar impact to a Nordic skier.

This past year, it has come to FOP's attention that snow-bicycles have been refused entry into Yellowstone. This makes no sense, and the Winter Use Plan should include analysis of snow-bicycles in the action alternatives. Snow-bicycles should be welcomed to the park as an over-snow non-motorized mode of travel, similar to skis. If roads are groomed in the winter for snowmobiles, or if a route is open in the summer to bicycles, such as the Lone Star Geyser road, then they should be open to snow-bikes. The impact of a snow-bike is no more than a skier, and speeds are generally the same, about 5 mph. Snow-bicycles produce no pollution, no noise, and are a healthy enjoyable alternative to visit groomed roads in Yellowstone. If snow-bicycles can complete the famous Iditarod route from Anchorage to Nome, over 1150 miles in severe winter conditions, surely there is reason to consider allowing snow-bicycles to travel along Yellowstone's groomed roads in winter.

**Corr. ID:** 1687      **Organization:** *Not Specified*

**Comment ID:** 130183      **Organization Type:** Unaffiliated Individual

**Representative Quote:** One winter use I would encourage you to adopt would be over-snow bicycles. The only winter use that would be more park friendly than bikes would be Nordic skis. Bikes would be much better than snow coaches or snowmobiles.

**Corr. ID:** 1689      **Organization:** *Not Specified*

**Comment ID:** 130288      **Organization Type:** Unaffiliated Individual

**Representative Quote:** As you determine what areas to evaluate as regards the winter travel plan, I would strongly urge you to look at allowing more non-motorized use, specifically snow bikes.

In recent years bicycle technology has evolved to allow over-snow travel with 4 inch wide, low pressure tires. While they do very well on groomed surfaces they still do not provide means to travel in untracked snow. There is no risk that snow bikes would travel cross country in the winter. The speeds traveled, snow penetration and trail disturbance are quite similar to the impacts of a cross-country skier. There are no emissions from a human powered winter bicycle (well, maybe that depends on the human riding it!).

At this time it seems the language which states "no wheeled vehicles" is the sole impediment to allowing snow-bicycles in the park. I presume the intent was to prohibit



motorized wheeled vehicles and was written at a time before the advent of the fat-tired, over-the-snow bicycle.

Snow bikes have been used on the Iditarod trail in Alaska. They are allowed on Forest Service lands adjacent to Yellowstone. Many snow bikers are willing to pay for the privilege. The group of friends I ride with have all purchased Wyoming snowmobile tags to support grooming efforts.

It seems illogical (and I believe it is actually just an oversight and anachronism) that a low-impact activity like snow-bicycling would be prohibited while the much more impactful snow machine use would be allowed.

Perhaps you would consider a test period to evaluate the impacts of snow bicycling in the park. I know there would be several local resources that could perform such an evaluation. The local bike shops, advocacy groups and individual riders would be more than happy to demonstrate.

**Concern ID:** 23675

**CONCERN STATEMENT:** [One commenter requested that a "no shoot zone" be established around the park boundary.](#)

**Representative Quote(s):** **Corr. ID:** 1685      **Organization:** *Not Specified*

**Comment ID:** 130180      **Organization Type:** Unaffiliated Individual

**Representative Quote:** "Shooting for the moon," I would also like to suggest a "no shoot zone" of reasonable distance around the park boundary to allow more protection of Yellowstone's wildlife.

**Concern ID:** 23676

**CONCERN STATEMENT:** [Commenters requested an alternative that is geared more toward enhancing the non-motorized use experience. Suggestions included groomed trails, more signage at trailheads, segregated lanes for skiers, the addition of warming huts, and allowing non-motorized users free access.](#)

**Representative Quote(s):** **Corr. ID:** 16      **Organization:** Winter Wildlands Alliance

**Comment ID:** 129508      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Your best options are to cease explosive avalanche control, prohibit snowmobiles, encourage snowcoaches and cross-country skiing, and provide for more interpretive services to the visiting public. Ski patrols by rangers to enforce this new biofriendly plan will need helicopter backup for the interception of violators, and for rescue emergencies. Contracts with nearby heli-skiing operators may be the most cost effective way to accomplish this. Involving them also means less chance of unwanted intrusions by helicopters.

**Corr. ID:** 147      **Organization:** Cascades Mountaineers and Central Oregon Nordic Club

**Comment ID:** 128335      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Allow all non motorized visitors free access.

**Corr. ID:** 353      **Organization:** *Not Specified*

**Comment ID:** 126612      **Organization Type:** Unaffiliated Individual

**Representative Quote:** I have had the experience of cross country skiing from Old Faithful, the Canyon yurts and Indian Creek. Opening up the northwest section of the park to cross country skiing would be wonderful. I would keep the Canyon area, Hayden Valley and Yellowstone Lake accessible only by snow coach.

**Corr. ID:** 622                      **Organization:** Greater Yellowstone Coalition

**Comment ID:** 126749      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Maybe Yellowstone should be limited to cross country skiers with overnight huts spread at certain distances like the Curry Camps of Yosemite?

**Corr. ID:** 1290                      **Organization:** *Not Specified*

**Comment ID:** 128227      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Along with a ban, appropriate back-country travel amenities such as yurts should be considered in any future planning.

**Corr. ID:** 1314                      **Organization:** *Not Specified*

**Comment ID:** 128984      **Organization Type:** Unaffiliated Individual

**Representative Quote:** I encourage Yellowstone National Park to use the long-term winter management plan as an opportunity to improve services for skiers, snowshoers, winter hikers, snow bicyclists and other quiet winter visitors. Improved services should include groomed trails dedicated to non-motorized use and trailhead services such as warming huts. I support studying the feasibility of a system of huts or yurts or anything that allows us to quietly include ourselves among the species who enjoy the area.

**Corr. ID:** 1415                      **Organization:** *Not Specified*

**Comment ID:** 127675      **Organization Type:** Unaffiliated Individual

**Representative Quote:** At trail heads (Warm Creek, Upper & Lower Baronett & Thunderer) please put up signage that gives visual directions showing snowshoers should walk along side of ski tracks, not upon them.

Also in that signage install parking directions to indicate vehicles should be parked 45 degrees to the roadway - giving more space for the greater number of skiers that are utilizing those parking areas now days

**Corr. ID:** 1477                      **Organization:** *Not Specified*

**Comment ID:** 129076      **Organization Type:** Unaffiliated Individual

**Representative Quote:** I also encourage you to use the long-term winter management plan as an opportunity to improve services for skiers, snowshoers and other quiet winter visitors. Improved services should include groomed trails dedicated to non-motorized use and trailhead services such as interpretive information and warming huts in appropriate locations.

**Corr. ID:** 1482                      **Organization:** *Not Specified*

**Comment ID:** 128745      **Organization Type:** Unaffiliated Individual

**Representative Quote:** What other issues, concerns, or suggestions do you think should be considered as we develop the new long term Winter Use Plan/EIS?

My fundamental concern is winter access to Yellowstone. Under the current and historic winter operations in Yellowstone only the northern part of the Park is accessible during the winter without heroic effort and cost. I have hired snowcoach and rented snowmobile access in the past to the western part of the Park, but it is costly and restrictive in terms of schedule. In addition to the enjoyment of viewing Park scenery and wildlife during the winter, my primary interest is cross-country skiing. This is a very popular winter activity

with limited availability in the Park. The northern part of the Park suffers from thin snowpack and steep slopes, a condition not especially conducive to skiing. The western and central portions of the Park are flatter and deeper snow areas, yet it is very difficult and costly to get to them under the current snowmobile/snowcoach access program. I feel the winter use options are too heavily weighted toward motorized recreation (roadway viewing) and do not provide for reasonable non-motorized access (cross-country skiing on trails).

**Corr. ID:** 1502                      **Organization:** Friends of Pathways

**Comment ID:** 128483            **Organization Type:** Unaffiliated Individual

**Representative Quote:** - The Winter Use EIS should include in at least one action alternative the creation of a hut system for winter non-motorized skiers and snow-bicyclists to be able to travel from Flagg Ranch to Old Faithful, with distances of about 10 miles between cabins, huts, or yurts.

- An EIS action alternative should study allowing snow-bicycles on all groomed roads and on any route open to bicycles in the summer.

**Corr. ID:** 1527                      **Organization:** *Not Specified*

**Comment ID:** 129166            **Organization Type:** Unaffiliated Individual

**Representative Quote:** CONTINUE REGULAR GROOMING AND ENCOURAGE CROSS COUNTRY SKING - EVEN GROOM FOR SKIERS, PERHAPS SEGREGATE A LANE OR SHOULDER FOR SKIERS.

**Corr. ID:** 1561                      **Organization:** *Not Specified*

**Comment ID:** 129326            **Organization Type:** Unaffiliated Individual

**Representative Quote:** I also promote increased opportunities for visitors to engage in physical activity in the park. But common sense and scientific evidence show that physical fitness is associated with promoting health and lowering health care costs. Increased opportunities for physical activity would support Mrs. Obama's program to combat obesity among Americans. Beyond the health issue, obesity has a large impact on the US economy. A report by the Department of Health and Human Services indicating that almost "virtually all individuals can benefit from regular physical activity" and that Americans pay huge a physical and financial cost for sedentary lifestyles. Furthermore, the Centers for Disease Control and Prevention (CDC) estimate that the direct medical cost of physical inactivity in the US is \$75.6 billion annually.

Ways to address the issue of increasing opportunities for physical activities is to increase the amount of ranger led hikes, cross-country ski, and snowshoe opportunities, improve trails and trail management, and promote snowshoe and cross-country ski activity in YNP. The groomed ski trails in the Old Faithful area are a perfect example. Permitting additional snowvans and snowcoaches would enable park visitors to travel over snow to reach trails near Old Faithful and other geysers.

**Corr. ID:** 1680                      **Organization:** *Not Specified*

**Comment ID:** 130138            **Organization Type:** Unaffiliated Individual

**Representative Quote:** One possibility could be a Nordic Center featuring some of the most scenic trails and also using some of the facilities for over night lodging.

**Concern ID:**

23679

**CONCERN  
STATEMENT:**

Commenters suggested that the park implement an option for alternative transportation in the winter in the form of a shuttle, bus, trolley, or monorail.

**Representative Quote(s):** **Corr. ID:** 110                      **Organization:** *Not Specified*

**Comment ID:** 126931                      **Organization Type:** Unaffiliated Individual

**Representative Quote:** An installation of a park-wide trolley system that operates year-round. A trolley system would allow continued tourist management and have a low impact on the surrounding ecosystem. Raise the price of taking a car through on the roads as an incentive for trolley travel.

**Corr. ID:** 123                                      **Organization:** GOSA

**Comment ID:** 127515                      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Bus service could be made available if visitors choose not to drive their own autos. Tour buses would have access just the same as in other seasons, which could be a greater source of new income for tour operators, concessionaires and surrounding communities while replacing income for lost oversnow operations.

**Corr. ID:** 154                                      **Organization:** *Not Specified*

**Comment ID:** 129312                      **Organization Type:** Unaffiliated Individual

**Representative Quote:** YNP should provide inexpensive, reasonable methods for the public to transit and enjoy parts of the YNP during the winter, and protect wildlife habitat, wildlife migration, wildlife's daily need to eat, mate, and live as natural as possible without negative impacts by people and machinery.

**Corr. ID:** 250                                      **Organization:** *Not Specified*

**Comment ID:** 126902                      **Organization Type:** Unaffiliated Individual

**Representative Quote:** At the very least if nothing else changes then a shuttle service allowing the transport of privately owned snowmobiles should be started between Flag & West. Perhaps this could be accomplished by snow coaches pulling flat beds on skids. This would allow historical access to the NF lands in West & Island Park without having to drive hundreds of additional miles. It would also help the waning winter economy of West.

**Corr. ID:** 287                                      **Organization:** *Not Specified*

**Comment ID:** 127633                      **Organization Type:** Unaffiliated Individual

**Representative Quote:** A reasonable compromise would be a shuttle of some sort that runs from West Yellowstone to Old Faithful with pickups at pre-determined points (and "as-needed") every hour or two and costs no more than \$15 each way. This would allow visitors to explore areas they would explore if using their own vehicles, keep traffic accidents to a minimum, and allow non-affluent families access to the park in the winter from the west entrance.

**Corr. ID:** 392                                      **Organization:** *Not Specified*

**Comment ID:** 126701                      **Organization Type:** Unaffiliated Individual

**Representative Quote:** 4. MONORAIL  
Develop a monorail system for both winter and summer use? Give me a break--sounds like Disney.

**Corr. ID:** 406                                      **Organization:** *Not Specified*

**Comment ID:** 128396                      **Organization Type:** Unaffiliated Individual

**Representative Quote:** When the Park was first developed for public use, railroad lines were surveyed to certain park locations in an effort to obtain year-round access. What if a narrow-gauge electric powered passenger rail operation could be developed between West Yellowstone [utilizing the historic railroad depot there] and Old Faithful Lodge?

The line could be developed utilizing the historic survey[s] modified to avoid updated sensitive areas [geyser/thermal basins, et al]. Electric operation would be environmentally responsible, offer year round access to the Park Interior, and in summer would offer transportation alternatives to managing surface congestion.

**Corr. ID:** 410                      **Organization:** *Not Specified*

**Comment ID:** 128456      **Organization Type:** Unaffiliated Individual

**Representative Quote:** I would like to further suggest to the U.S. Department of Interior if this Project is subjected to become a 5 Year Trial Basis that I am also in support of having the Department go that route as well. That way after 5 years the Department could have enough time to further open up discussions of the Projects outcome on a yearly basis; and see how budget expenses are going; and see if additional Public Input was favorable or not.

**Corr. ID:** 891                      **Organization:** *Not Specified*

**Comment ID:** 127704      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Snow coaches could be used to aid skis and snowshoes. For instance, cross country skiers traveling from Mammoth to Old Faithful may elect to return to Mammoth via snow coach, rather than ski back.

**Corr. ID:** 1156                      **Organization:** *Not Specified*

**Comment ID:** 128060      **Organization Type:** Unaffiliated Individual

**Representative Quote:** In considering this winter use plan I am especially concerned about:

- Air pollution - even with Best Available Technology as it currently exists, snowmobiles have an extraordinarily high level of emissions considering how far they're transporting people and how much fuel they're using. Global climate change is a real concern. Regular public transit (perhaps hybrid or electric snow coaches?) would be a much better alternative to protect this landscape during winter, when pollution lingers long, and for the long term.

**Corr. ID:** 1340                      **Organization:** *Not Specified*

**Comment ID:** 128736      **Organization Type:** Unaffiliated Individual

**Representative Quote:** A third way to provide affordable winter access to Yellowstone would be to continue to hard pack the road for over snow travel, but to provide an affordable shuttle service with unguided snow coaches between West Yellowstone and Old Faithful. These shuttles should run at routine times throughout the day. Shuttles would stop along the way at some of the more commonly used sights to pick up and drop off passengers, like the public transportation systems commonly used in many larger cities. Shuttles could easily be profitable for the Park Service, or could be run by a private company and would provide safe travel in the Park with little added environmental impact. Winter visitors to Yellowstone could still pay for a guided snow coach or snowmobile trip if they wanted the benefits of either, but would not be limited to these expensive options as the only way to see Yellowstone in the winter.

**Corr. ID:** 1499                      **Organization:** *Not Specified*

**Comment ID:** 128440      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Under a public works project, it may also be possible to create a rail system internal to the Park, which would help with winter access, and with summertime smog and congestion. I know this option is not being considered but I wanted to add it.

Biodiesel, propane or electric public conveyances are my choices for winter access to

Yellowstone.

**Corr. ID:** 1571                    **Organization:** *Not Specified*

**Comment ID:** 129229        **Organization Type:** Unaffiliated Individual

**Representative Quote:** Snowcoaches have proven their value as a quieter, less-polluting means of visiting the parks during the snow season and reaching places where they can enjoy nature on foot, on snowshoes or on skis. We urge the National Park Service to put much greater emphasis on human-powered travel. (I have used both skis and snowshoes on winter outings).

More winter trailheads should be developed along park roads, and these should be publicized on the Yellowstone web site and in literature. Snowcoach shuttle trips to take visitors to trailheads should be readily available. Please explain in the EIS how many trailheads will be accessible by snowcoach and how visitors will learn about these opportunities.

The EIS should also analyze trends in human-powered activities such as cross-country skiing and snowshoeing. My recollection is that in the 1960s few people were doing cross-country skiing or snowshoeing, and there appears to have been a great increase in the popularity of these activities on a national level. The use of modern materials has made snowshoes and skis more popular for winter visitors. Likewise, synthetic fabrics such as fleece have enabled more people to participate in snowshoeing and skiing.

**Corr. ID:** 1578                    **Organization:** *Not Specified*

**Comment ID:** 129884        **Organization Type:** Unaffiliated Individual

**Representative Quote:** What are some potential options for managing motorized winter use at Yellowstone?

The EIS should have a plowed personal vehicle, commercial tour, and shuttle bus (MASS TRANSIT) mixed use option. This option should include: The entire West Side plowed, including Mammoth to Norris, Norris to Madison Jct. and the West Entrance to Old Faithful.

Personal vehicles should be allowed with restrictions, including AWD or 4WD with snow tires required. There could possibly be limits set or reservations taken in peak periods. There could possibly be education required; tire checks and DVD park traveling lessons at the Interagency Visitor Center before entrance for the first time in winter. The speed limit should be lowered from 45 to 30 MPH.

Commercial tours with current or future concessionaires should be allowed with no four wheel drive requirements for the bus/vehicle or education requirement for the passengers as the driver is the guide.

A shuttle bus system should be started between West Yellowstone and Old Faithful, which stops at Madison Jct, the geyser basins, and other stops to be determined? Since many of today's winter visitors are on a day trip from Big Sky Resort, the education requirement will encourage these visitors to use a commercial tour or shuttle. To further encourage people to use the shuttle between West and Old Faithful, the current fleet of Xanterra (NPS) tour busses should be replaced. They are old, unattractive, do not have thermal pane windows, and the newer electronic engines are far cleaner with significantly less particulate (soot) emissions.

Oversnow operations should continue out of South Entrance with snowmobiles and snowcoaches. Snowcoaches and snowmobiles should also be permitted to operate from Old Faithful to Canyon and other park destinations. The East Entrance should be closed due to the high cost of operations per park visitor. The logistics of Norris to Canyon

Oversnow vehicle operations should be analyzed as to cost and feasibility, since there is no current infrastructure to support them at Norris.

**Concern ID:** 23681

**CONCERN  
STATEMENT:**

Commenters requested that additional regulations for snowcoaches be put in place. These include a drag device for large (20+ passenger) snowcoaches, not allowing large snowcoaches, restrict snowmobiles and snowcoaches to the same number of passengers, and making sure the NPS has ridden in all snowcoaches.

**Representative Quote(s):** **Corr. ID:** 144                      **Organization:** *Not Specified*

**Comment ID:** 129496                      **Organization Type:** Unaffiliated Individual

**Representative Quote:** The old park Bombadier snow coaches are also very loud and have very high emissions, not to mention that you can't even see out of them. They should be banned. You should be able to stay in the park at Snow lodge if you come into the park in any approved oversnow vehicle (i.e. meets noise and emission limits). In the past you had to ride in the terrible Bombadier coaches to stay overnight when private operators had modern rubber tracked vans that were much better to see out of and much cleaner and quieter.

**Corr. ID:** 147                                      **Organization:** Cascades Mountaineers and Central Oregon Nordic Club

**Comment ID:** 128331                      **Organization Type:** Unaffiliated Individual

**Representative Quote:** As far Coaches carrying visitors, establish quotas on Licensed guides and visitors using this means of visitation well below impact levels.

**Corr. ID:** 234                                      **Organization:** *Not Specified*

**Comment ID:** 127368                      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Snowcoaches have their share of associated problems as well, but the majority of these are of easy mitigation. New vehicles continue to make the experience better, and if the National Park Service would make it a point to ride the tours of all operators, the quality of the commentary offered would improve as well.

**Corr. ID:** 861                                      **Organization:** *Not Specified*

**Comment ID:** 127506                      **Organization Type:** Unaffiliated Individual

**Representative Quote:** If you are going to restrict snowmobiles to a certain number then snow coaches should be restricted to the same number of passengers as can go in on snowmobiles. Or if you don't allow snowmobiles then don't allow snowcoaches or skiers either and close it down in the totally, furlough all employees, think how much that would save. Yellowstone should be there for everyone not just the elite few who can afford to pay the big Dollars. What will limit next? Cars?

**Corr. ID:** 1395                                      **Organization:** *Not Specified*

**Comment ID:** 127118                      **Organization Type:** Unaffiliated Individual

**Representative Quote:** 1) For safety snow coaches need to:  
a) Have a weight limit  
b) Be required to attach some type of "scratcher" type device to fill the grooves they leave in the snow's surface. As a snowmobile guide in the park for 8 years my observation is, the grooves left in snow's surface can be a safety concern for a beginning snowmobile operator. For many of our visitors this is their first experience on a snowmobile.

**Corr. ID:** 1560                      **Organization:** *Not Specified*

**Comment ID:** 129255            **Organization Type:** Unaffiliated Individual

**Representative Quote:** 4. I do not believe that is it safe to have snowcoaches that seat over 16 passengers. They create an entirely unsafe environment on the trails they travel. The ruts they create, in my opinion are worse than when we had 1000 snowmobiles a day. If there was a major incident with one of the larger coaches, ie. 28 passenger, how would this be handled medically? There is not the resources to take care of such a medical situation.

**Corr. ID:** 1583                      **Organization:** Yellowstone Arctic Yamaha

**Comment ID:** 129811            **Organization Type:** Business

**Representative Quote:** Provision should also be made for snowcoach numbers to increase at the end of the 2013 contract, depending on the trends of the future. Further, I believe that large snowcoaches that carry over 20 passengers should be required to have some type of small drag device to pull behind them as a self-grooming tool to help fill the huge ruts caused by the extreme size and weight of these vehicles. The ruts left by these huge snowcoaches are a safety hazard to people traveling by snowmobile. These machines should be expected to mitigate their impact, particularly on soft, non-compacted snow. This concern was also addressed in Suzanne Lewis' October 15, 2009 Response to Form Comment Letters where she stated, "In the 1990's, snowcoaches averaged about 15 vehicles per day. In 2007-2008, coaches peaked at about 60 per day. With this growth in numbers, and the increase in larger, heavier coaches, park staff observed rutted, torn-up snow roads from snowcoach use".

**Concern ID:** 23682

**CONCERN STATEMENT:** Commenters requested that guides for snowmobile use count as administrative use, rather than part of the daily limit.

**Representative Quote(s):** **Corr. ID:** 1583                      **Organization:** Yellowstone Arctic Yamaha

**Comment ID:** 129813            **Organization Type:** Business

**Representative Quote:** Please consider allowing guide snowmobiles to be counted as administrative travel rather than being required to count as a permitted snowmobile. Guides have been required by the National Park Service and are instrumental in helping assist with law enforcement duties by keeping their groups in order, enforcing wildlife viewing rules and maintaining the safety rules of the Park. Many other groups (contractors) are counted as administrative travel, and I believe guides should be counted this way as well. This would also help free up some slots in our allotments that can be used for the visiting public.

**Concern ID:** 23683

**CONCERN STATEMENT:** Commenters suggested changing the dates of winter use in the park. These suggestions included having the opening/closing dates not tied to a specific date, but rather a set day of the week (i.e. the third Monday in December), having the season from December 20 to March 10, extend the winter season a week, and only allow one week for plowing between winter seasons.

**Representative Quote(s):** **Corr. ID:** 379                      **Organization:** *Not Specified*

**Comment ID:** 126678            **Organization Type:** Unaffiliated Individual

**Representative Quote:** extend the winter use season an extra week, if snow permits.



**Corr. ID:** 1328      **Organization:** *Not Specified*

**Comment ID:** 128965      **Organization Type:** Unaffiliated Individual

**Representative Quote:** As for the in between seasons, 1 week closure for plowing, and conditional open roads based on road conditions seems reasonable

**Corr. ID:** 1439      **Organization:** *Not Specified*

**Comment ID:** 128892      **Organization Type:** Unaffiliated Individual

**Representative Quote:** The current set dates for the winter season are impractical. I propose that if Yellowstone continues with set dates for the winter season that the dates be changed so that the winter season runs from December 20th to March 10th.

During low snow years (and there have been many) it is always questionable whether or not we will be able to open to oversnow travel on time. Opening a few days later gives the park more time to get the necessary snow. Additionally, there are few people who plan winter recreation and trips in mid-December. Many people make plans for Christmas trips to Yellowstone, but the vast majority of those trips do not start on or near December 15th (the current opening date for the winter season).

Also during low snow years, in early March with longer, warmer days it can be challenging and unsafe to attempt to maintain an oversnow travel season. The park service and the private companies booking and leading tours into Yellowstone are setting themselves up for failure by planning for winter use in mid-March during winters like the most recent one. However even in low snow years, we have typically still had sufficient snow up to early March.

**Corr. ID:** 1497      **Organization:** *Not Specified*

**Comment ID:** 128511      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Structuring winter use for the future should include fixed opening and closing dates for the winter season that are a benefit to the visiting public and the concessionaires.

Fixed opening and closing dates give us all stability and reliability. However tying those dates to specific numbers such as December 15th and March 15th can be confusing and cumbersome to both the public and the operators. Some years the park opens on Monday, other years it is Thursday and so forth. I believe it would be easier for everyone to fix those dates to a day of the week. For example, the opening could be the Monday (pick a day) of the third week in December or of the week on which December 15th occurs. The closing dates could follow the same reasoning. Then everyone knows the Park will close at the end of the chosen Sunday, not a confusing choice such as closing on a Tuesday. The world functions on a weekly basis.

**Concern ID:** 23684

**CONCERN  
STATEMENT:**

Commenters offered suggestions for changing how fees are charged in the winter at Yellowstone. Suggestions included: a grooming fee for everyone in place of an entrance fee, a fee that covers OSV management costs, charging a garbage disposal fee, concerns about paying a yearly fee and only being able to use the park half of the year, increasing fees, and having "fee free" times.

**Representative Quote(s):** **Corr. ID:** 467      **Organization:** *Not Specified*

**Comment ID:** 129188      **Organization Type:** Unaffiliated Individual

**Representative Quote:** I am working on my PhD in sustainability education. I think you should charge each rider what it truly costs to manage sleds in the park: this includes the specific costs of managing winter visitors, and a fair share of the overhead to keep the

park open.

**Corr. ID:** 1478                    **Organization:** See Yellowstone.com

**Comment ID:** 128525        **Organization Type:** Unaffiliated Individual

**Representative Quote:** My issue with Winter Usage is to do with the Park Passes. Having just completed my first winter as a Snowcoach operations manager, I could not believe how complicated and convoluted the Winter Park Pass system is.

My Solution would be to simply give free admission to the park BUT everyone entering pay a \$5.00 "Grooming Fee". Irrespective of any pass they may have. Everyone pays this fee every time they go into the Park. So if for instance my wife & I double ride a snowmobile 1 day and then go on a Snowcoach the next we'd each pay \$5 per day. While the individual contributions would be down, overall it would increase the Parks revenue as everyone pays.

This would also be a much simpler system to implement and produce huge savings in the man hours currently required to manage the system.

Each Snowcoach driver or snowmobile guide would simply hand in a slip stating the number of passengers/riders and the park would bill these out at \$5 each to the concessionaire. These numbers could then be verified against the monthly usage sheets we currently complete.

This would also eliminate the need to pay concessionaires 25C per pass, which comes nowhere near to covering the costs of collecting the fees and only make calculating the moneys owed even more complicated.

I believe this idea would benefit everyone:-

- \* The Park Service will save on accounting costs and gain revenue.
- \* The public will know where they stand with park entry and cause less ill will than we currently experience with the different admission rules between summer and winter
- \* The Concessionaires will save on man hours implementing and selling the passes and we could if we wanted to, add the cost into the package price and so making the tours "all inclusive", further eliminating the and the fact that guests are often upset at the additional charge of park entry on top of the tours.

**Corr. ID:** 1584                    **Organization:** *Not Specified*

**Comment ID:** 129616        **Organization Type:** Unaffiliated Individual

**Representative Quote:** ii. Have all or parts of these popular periods be "fee free" to help with the costs

**Corr. ID:** 1667                    **Organization:** *Not Specified*

**Comment ID:** 130125        **Organization Type:** Unaffiliated Individual

**Representative Quote:** CHARGE A GARBAGE DISPOSAL FEE. \$20.00. WAIVE FOR THOSE WILLING TO VOLUNTEER 10 HOURS OF GARBAGE COLLECTION/CAMPGROUND MAINTENANCE SERVICES WHILE VISITING THE PARK - MAKE SYSTEM MANAGED BY VOLUNTEERS/RETIRED WORKERS.

**Corr. ID:** 1681                    **Organization:** *Not Specified*

**Comment ID:** 130139        **Organization Type:** Unaffiliated Individual

**Representative Quote:** National parks are one of the best values in entertainment venues. CHARGE MORE for the experience, and put those funds to work in protecting the health and security of all national parks.

**Concern ID:** 23685

**CONCERN STATEMENT:** Commenters requested that the Winter Use Plan include adaptive management. Specific suggestions were to base use on historic numbers, with an allowance for growth and to only limit OSV numbers if impacts are shown.

**Representative Quote(s):** **Corr. ID:** 144 **Organization:** *Not Specified*

**Comment ID:** 129502 **Organization Type:** Unaffiliated Individual

**Representative Quote:** There should be no need to have daily limits on oversnow vehicles for environmental reasons if you do these things. Only add daily limits later if demand increase to the point that congestion is to great or grooming can't keep the snow conditions safe for the traffic level.

**Corr. ID:** 372 **Organization:** *Not Specified*

**Comment ID:** 126663 **Organization Type:** Unaffiliated Individual

**Representative Quote:** 3. Do not use average use per season to set your limits as suggested by the Wyoming Governor.  
4. Set up monitoring stations to insure guided sleds continue to met air and noise quality guidelines.  
5. Maintain requirement for all snowmobiles trips to be guided-my last trip in there were snowmobile tracks in Gibbons meadow!

**Corr. ID:** 1473 **Organization:** International Snowmobile Manufacturers Association

**Comment ID:** 128802 **Organization Type:** Unaffiliated Individual

**Representative Quote:** 2. We support the Park Manager's authority to utilize adaptive management to make adjustments in snowmobile use levels. We agree the adjustment in these levels could include the visitor and guide education, timing of entries, group sizes, and overall visitation numbers.

**Corr. ID:** 1560 **Organization:** *Not Specified*

**Comment ID:** 129252 **Organization Type:** Unaffiliated Individual

**Representative Quote:** 1. I believe that Yellowstone should continue to use adaptive management currently and in the future. You need the opportunity to increase or decrease the numbers of snowmobiles or snowcoaches when science, concessionaires, and visitor experience require a change.

**Corr. ID:** 1572 **Organization:** Citizens for Balanced Use

**Comment ID:** 129359 **Organization Type:** Civic Groups

**Representative Quote:** The Park Service should consider historic numbers of use and then allow some sort of increase in numbers to allow businesses to grow. If businesses were assured that the Park would be open, they could in turn promote the opportunity for visitors to come and enjoy the Park. This has not been the case over the last several years and consequently the confusion has resulted in the reduction of Park visitation by snowmobiles and tourists in general. The Park service must stand up for the small gateway communities like West Yellowstone and not allow extreme environmental groups to destroy the economy of this community.

The scoping document should include economic factors as required under NEPA. Human impacts in relation to both social and economic impacts should be elevated in importance through the scoping process. Many times Park resources, unaffected by

winter use, are claimed by environmental groups as being adversely affected when no sound science is being used. Generated and estimated data is many times used when in fact sound science is available that contradicts such modeling data sets.

**Concern ID:** 23686

**CONCERN  
STATEMENT:**

Some commenters suggested closing Yellowstone in the winter. Specific suggestions were made as to specific areas/times that the park could close that included closing the Northern Range during harsh winters and closing the park a few days a week for recovery. Some commenters stated that if the park is closed to OSV use, it should be closed to all other non-motorized uses as well.

**Representative Quote(s):** **Corr. ID:** 878 **Organization:** *Not Specified*

**Comment ID:** 127568 **Organization Type:** Unaffiliated Individual

**Representative Quote:** One last statement I feel it would be very unfair to close the any National Park to just one segment of American Taxpaying Citizens. If it is closed to snowmobiles and snowcoaches I feel that it should be closed to hikers, skiers, snowshoers, autos, and busses.

**Corr. ID:** 1391 **Organization:** Yellowstone Safai Company

**Comment ID:** 128498 **Organization Type:** Unaffiliated Individual

**Representative Quote:** I wish to encourage you to reconsider the concept of closing the Northern Range during harsh winters. Currently we provide wilderness oriented snowshoe, hike, and ski options on the Northern Range. We intentionally avoid trails because skiing does not jibe with snowshoeing. In a similar way, we also provide wildlife-based service. I can confidently say that we disturb less wildlife than the average visitor, either commercial or non, and yet we probably experience wildlife in a more pristine and undisturbed manner. Closing the Northern Range will eliminate our product and service. Note that we provide an educational service grounded in sustainability and a sound land ethic. The "Northern Range" is a concept. It is not a hard and fast boundary on a landscape. When snow depth is extreme, the Northern Range expands outside of the National Park and contracts inside the National Park. Closing areas, which have no large grazing animals, is irrational.

**Corr. ID:** 1669 **Organization:** *Not Specified*

**Comment ID:** 130128 **Organization Type:** Unaffiliated Individual

**Representative Quote:** CLOSE THE PARK FOR THE WINTER. DO NOT OPEN UP UNTIL 1 MAY. LET THE ANIMALS REST IN PEACE...SO TO SPEAK.

**Corr. ID:** 1670 **Organization:** *Not Specified*

**Comment ID:** 130129 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Personally, I believe that Yellowstone should be closed to humans for the winter.

**Corr. ID:** 1682 **Organization:** *Not Specified*

**Comment ID:** 130140 **Organization Type:** Unaffiliated Individual

**Representative Quote:** I would like to propose "rest weeks": occasional long weekends or regular weeks that coincide with critical wildlife events such as mating seasons, migrations, etc. During these times the only back country access would be on foot. This would be the equivalent to bridges, highway stretches, rest stops or other infrastructure that are periodically closed for maintenance.

**Concern ID:** 23687

**CONCERN STATEMENT:** Commenters noted the need for access for those with disabilities, with one commenter suggesting this could be accomplished with dog sleds.

**Representative Quote(s):** **Corr. ID:** 266 **Organization:** Not Specified

**Comment ID:** 127514 **Organization Type:** Unaffiliated Individual

**Representative Quote:** I believe snowmobile use should be banned in all national parks that have winter snow cover except for use by government employees involved in emergency situations. Very limited use of other motorized snow travel vehicles should be allowed to accommodate park visitors who would otherwise not be able to experience a park in winter due to disability, age, or other physical/mental cause.

**Corr. ID:** 596 **Organization:** Bomarfam LLC

**Comment ID:** 127185 **Organization Type:** Unaffiliated Individual

**Representative Quote:** My wife is handcapped and we could not find a snowmachine capable of transporting her comfortably. I paid for a trip on a snowcoach just to see if it could happen. The snowcoach operator said the only way to get her on a machine would be to build a ramp. They had nothing available at the time. Many times we agonize over the unlawful government access to the Park for handcapped persons.

**Corr. ID:** 1194 **Organization:** Not Specified

**Comment ID:** 128149 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Some argue that this will limit access to the elderly, or handicapped, who can not snowshoe or ski into the park on their own. For these individuals dog sled teams should be allowed to carry visitors on park roads. Not only are dogs quiet and non-polluting, but sled dogs are used extensively in Denali National Park with much success. Working dogs in harness do not chase or disturb wildlife, and are a historic and natural part of northern winter travel. This would also silence the snowmobile tour guides who scream financial ruin if snowmobiles are banned, as they will have the option to focus their efforts on dog sled tours. It seems that the Park Service has issues with dogs in general (the little known sport of skijoring is specifically banned on park trails in winter, and dogs are rarely allowed on any National Park trails barring a few exceptions), but this is a valid option that will satisfy all arguments. Dog waste can easily be removed, and is an organic compound that will not pollute the air. Also, running dogs are extremely quiet, and will not disrupt the natural soundscapes. Additionally, many park visitors would very much enjoy the opportunity to experience the park in this manner, as most have never traveled by dog team, and this unique experience would likely attract more visitors.

**Concern ID:** 23689

**CONCERN STATEMENT:** One commenter requested that wood fires be allowed in the winter.

**Representative Quote(s):** **Corr. ID:** 1391 **Organization:** Yellowstone Safai Company

**Comment ID:** 128496 **Organization Type:** Unaffiliated Individual

**Representative Quote:** I fail to understand why wood fires are not allowed in winter. Regulations can be put in place regarding use of "fire blankets" and ash disposal. Thousands of square miles of Yellowstone have burned. Burned areas regenerate very

quickly. Lack of snow cover, and presence of snow cover, is not a valid reason not to allow wood or open fires.

**Concern ID:** 23690

**CONCERN STATEMENT:**

One commenter suggested the use of horse and dog-drawn sleds in the park.

**Representative Quote(s):** **Corr. ID:** 1668 **Organization:** *Not Specified*

**Comment ID:** 130127 **Organization Type:** Unaffiliated Individual

**Representative Quote:** As a lover of Yellowstone, and all the Rocky Mountain National Parks, I also favor horse- and dog-drawn sleds for smaller trips and smaller crowds.

**Concern ID:** 23691

**CONCERN STATEMENT:**

Commenters suggested that zoning of uses occur, with areas for snowmobile use for those who want to engage in that activity. Areas set aside for protection of wildlife were also suggested. Others suggested segmenting areas for OSV use, wheeled vehicle use, and no motorized vehicle use.

**Representative Quote(s):** **Corr. ID:** 321 **Organization:** *Not Specified*

**Comment ID:** 126449 **Organization Type:** Unaffiliated Individual

**Representative Quote:** The essence of Yellowstone in the winter are the globally unique geothermal areas, the greatest concentration of which is in the Upper and Lower Geyser Basins of the Old Faithful Area. Extraordinary wildlife viewing opportunities exist along the Madison and Firehole River corridors from West Yellowstone; while the South Entrance road follows the Lewis River to the Continental Divide through the most isolated winter landscape in the lower US. This is indeed an adventure of a lifetime for most winter visitors. The access available to visitors from these corridors "allows the public to experience the Yellowstone's unique winter resources and values", as expressed in the scoping document purpose.

Winter road corridors that are currently maintained for visitor access that would be restricted to administrative use would be on the west side: Mammoth to Norris, Canyon to Norris, Norris to Madison; and on the east side West Thumb to Fishing Bridge and Canyon to Fishing Bridge. The route from Canyon to Tower would remain closed to all oversnow traffic, as most of the corridor currently is. The East Entrance would be closed, including to administrative traffic to avoid both the costs of grooming and the avalanche danger of Sylvan Pass. Access to Cody by Park employees, when grooming would be accomplished through the South Entrance and out via Togwotee Pass. Grooming of these administrative routes would occur on an as-need basis to provide safe passage to users.

This alternative (and others) would benefit from, a cost examination which would include savings from elimination of the annual avalanche mitigation program (c. \$300,000 currently) and grooming from the East Entrance to Fishing Bridge, more efficient spring clearing of ungroomed of lightly compacted corridors (as opposed to the high density hardened groomed public routes), and need for enforcement and corridor patrols along restricted routes.

An appendix with visitor tour cost information from each gateway portal provided by concessionaires would be a helpful addition to the EIS so that a more complete picture of visitor demand and accommodation for oversnow vehicle winter use access can be displayed.

**Corr. ID:** 1226      **Organization:** *Not Specified*

**Comment ID:** 126366      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Also why couldn't snowmobiling be available for certain areas in the Park as well for those that would wish to do so.

**Corr. ID:** 1391      **Organization:** Yellowstone Safai Company

**Comment ID:** 128499      **Organization Type:** Unaffiliated Individual

**Representative Quote:** At this time, no alternative has suggested the possibility of zoning of use. More visitors and businesses could be accommodated if regions were identified and types of appropriate use were identified. For example, regions could be identified for snowshoeing off trail and education could be dictated to minimize disturbance to wildlife, while maximizing experience. An alternative might include only allowing visitation when using a Commercial Use Authorization holder. Then only CUA holders need to be educated and an economic alternative can be developed. I expect some to criticize this as benefiting self-interest, but again, interpretation yields higher values, and requires a knowledgeable sensitive guide, and does allow the general public to access not only a resource, but also an experience.

**Corr. ID:** 1584      **Organization:** *Not Specified*

**Comment ID:** 129614      **Organization Type:** Unaffiliated Individual

**Representative Quote:** What are some potential options for managing motorized winter use at Yellowstone?

Access should truly be for the public. With the exception of Mammoth where families can enter in a wheeled vehicle and where the winter experience is more limited, there currently is really no way for the general public to consider a winter visit to Yellowstone. The cost becomes prohibitive. Please give consideration to:

1. The option for plowing interior roads especially on the West side with thought
  - a) To include roads from Mammoth to Old Faithful and West Yellowstone to Madison Junction
  - b) To allow private vehicles placing restrictions on tires and/or requiring chains to be available in the vehicle. In order to get to either Mammoth or West Yellowstone these individuals have already traversed nearly 100 miles
  - c) To limiting access to the daylight hours for private vehicles
  - d) That Jackson (and perhaps Cody) retains the ability to have OSV travel to allow for visitation to both Old Faithful and Canyon
  - e) To create OSV staging areas at Norris and at Old Faithful to provide for the transition in types of transportation and allowing outside concessioners to submit proposals for such services. The South entrance's operation can be a basis to develop this portion of the plan.

**Corr. ID:** 1667      **Organization:** *Not Specified*

**Comment ID:** 130124      **Organization Type:** Unaffiliated Individual

**Representative Quote:** ACQUIRE MORE LAND IN THE PARK IN THE AREAS THAT ARE NEEDED TO PROTECT THE "OVERFLOW" OF ANIMALS DURING SEVERE WINTER WEATHER.

**Concern ID:** 23692

**CONCERN  
STATEMENT:**

Commenters made suggestions for alternative elements that would reduce noise in the park. These suggestions included: requiring skiers to wear helmets with intercoms for talking, only licensing a few tour companies with low quotas, require multiple passenger snowmobiles, and establishing noise restrictions for visitors.

**Representative Quote(s):** **Corr. ID:** 151                      **Organization:** *Not Specified*

**Comment ID:** 129257                      **Organization Type:** Unaffiliated Individual

**Representative Quote:** I also ask that all skiers be required to wear helmets with intercoms for talking so they don't have to yell. Any non-motorized recreationalist should be required to wear high visibility clothing in an approved park color. Equipment such as ski poles will be modified to make them useless as a weapon. It is proven that wildlife are far more apprehensive of the "Man figure" non-motorized recreationalist than they are of a snowmobile or car. We would require non-motorized recreationalist to remain out of sight of the wildlife.

**Corr. ID:** 352                                      **Organization:** *Not Specified*

**Comment ID:** 126610                      **Organization Type:** Unaffiliated Individual

**Representative Quote:** However, even beyond the scope of winter travel, I would encourage the NPS to establish noise restrictions on park visitors!

Nothing is more irritating than to be observing the park's scenery and wildlife only to have our visitation disrupted by excessively noisy vehicles among which are primarily unmuffled motorcycles! A ruling requiring a minimal noise level by requiring mufflers on these vehicles would enhance visitation by others who do not cause such excessive disturbance. Nationwide advertising of such restriction would put those who own and enjoy the excessive noise of such vehicles on notice, that they either quiet their vehicles or, choose another quieter way to enter and visit the park.

Both the animals in the park and we visitors who are constantly annoyed by such excessive noise, would be appreciate such restrictions

If the NPS can require noise and exhaust restrictions to protect the park during the winter months to protect the park's animal population and to enhance the enjoyment of other visitors who are entitled to undisturbed enjoyment of the park/s, they can certainly restrict unlimited vehicular noise at all other times for the same reasons! I encourage you to do so

**Corr. ID:** 502                                      **Organization:** *Not Specified*

**Comment ID:** 126367                      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Multiple passenger snowmobiles should be the rule of the day. This allows the "people" easier access to the park - and cuts down on "multiple vehicle" noise.

**Corr. ID:** 774                                      **Organization:** Friends of the Quinnipiac

**Comment ID:** 127115                      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Volume is the problem. I live next to an area where the winter silence is broken by the occasional snow mobiler- no problem. But in California, where I lived for years adjacent to a state forest, it was the roaring numbers that pounded the place that became an intolerable nuisance for neighbors and the health of the park itself. I have family members in the recreational outing business and I think nothing short of licensing A FEW

touring companies with some quota in terms of numbers, (which is hard to enforce and subject to eternal expansion creep), you might as well let our fragile, wild places become highways.

Your stated job is to not let this happen; Yellowstone's protection is on your watch.

**Concern ID:** 23697



**CONCERN  
STATEMENT:**

Commenters stated that increased law enforcement/rangers should be included in the Winter Use Plan. Increased fines for violators and well as removing violators from the park were suggested.

**Representative Quote(s):** **Corr. ID:** 20 **Organization:** *Not Specified*

**Comment ID:** 126944 **Organization Type:** Unaffiliated Individual

**Representative Quote:** hire more winter seasonal Park Rangers for oversight of the snowmobiles along the routes.

**Corr. ID:** 415 **Organization:** *Not Specified*

**Comment ID:** 128568 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Anyone caught harassing animals should be severely fined and equipment confiscated.

**Corr. ID:** 1159 **Organization:** Montana Snowmobile Association

**Comment ID:** 128079 **Organization Type:** Unaffiliated Individual

**Representative Quote:** I see the need for slight regulation such as speed limits and harsh penalties for anyone who breaks the speed laws or rides off the presumed trails within the park because after all it is a National Park. However, I don't see the need to further restrict the people that follow the rules and just wanna enjoy the park to nearly push them out or out indefinitely. Again I stress, Laws are laws and they are put there to keep us under control and safe, but there comes a point when laws are too much and in my history classes in college i am seeing what that has led to in the past. I'm not advocating "everyone go out and break the laws of the park", but i am suggesting that the groups who say they "love the outdoors" and have never hardly set foot in their out free backyard take a second and realize why Yellowstone was made in the first place.

**Corr. ID:** 1589 **Organization:** Montana Fish, Wildlife, and Parks

**Comment ID:** 129866 **Organization Type:** State Government

**Representative Quote:** Consider the issue of personal responsibility on the park of users as part of addressing issues of public safety and regulatory compliance. This should include some review of the role of enforcement patrols and compliance with regulations. Hold visitors responsible for their behavior through enforcement of rules is preferred over restricting the broader public recreation opportunity due to poor ethics or unsafe behavior on the part of a few users.

**Concern ID:** 23698

**CONCERN  
STATEMENT:**

One commenter suggested that Wyoming, Idaho, and Montana residents be provided easier access.

**Representative Quote(s):** **Corr. ID:** 773 **Organization:** *Not Specified*

**Comment ID:** 127114 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Holders of Wyoming, Idaho, and Montana drivers licenses should get some type of local privileges allowing easier access for them

**Concern ID:** 23699

**CONCERN  
STATEMENT:**

Commenters suggested limitations on when and where OSV should be used. These suggestions including no vehicles on the roads after sunset, allowing more visitation at Firehole Canyon Drive, and closing Fountain Flats/Freight Road to oversnow travel.

**Representative Quote(s):** **Corr. ID:** 415 **Organization:** *Not Specified*

**Comment ID:** 128572 **Organization Type:** Unaffiliated Individual

**Representative Quote:** I also believe that no vehicles should be allowed on the roads after sunset.

**Corr. ID:** 1395 **Organization:** *Not Specified*

**Comment ID:** 127122 **Organization Type:** Unaffiliated Individual

**Representative Quote:** 4) We should consider opening the Firehole Canyon drive to all visitors for both AM and PM visits.

**Corr. ID:** 1439 **Organization:** *Not Specified*

**Comment ID:** 128893 **Organization Type:** Unaffiliated Individual

**Representative Quote:** The Fountain Flats/Freight Road should be closed to oversnow travel. This road was initially allowed for snow coach travel during the days of unlimited snowmobiles to give coaches some relief from the crowds of snowmobiles. Now that we are guided with limited numbers, there is no need to get away from snowmobiles. Using the Freight Road does not allow visitors to see anything that they are not likely to see using the Grand Loop Road. Leaving the Freight Road closed to oversnow vehicles gives wildlife some winter habitat on the flats and along the Firehole River where they can be undisturbed by motorized traffic.

There is no compelling reason to keep the road open to snowcoaches but creating a better winter habitat for wildlife should be a compelling reason to keep the road closed.

**Concern ID:** 23700

**CONCERN STATEMENT:** Commenters suggested new options for winter lodging in the park including cabins, limiting the amount of lodging provided in the park during the winter, more camping areas, and opening the Obsidian Dormitory.

**Representative Quote(s):** **Corr. ID:** 234 **Organization:** *Not Specified*

**Comment ID:** 127374 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Additionally, the Obsidian Dormitory at Old Faithful (next to the Snow Lodge), which in former times was opened in the winter as a guest facility called Snowshoe Lodge, could be reopened as a hostel at Old Faithful with cheaper accommodations. Costs could be kept down for the concessioner if the rooms were offered without bedding (sleeping bags must be brought), altered so that no electric outlets were available for use, the heat kept to 65 degrees Fahrenheit without option for warmer, and showers converted to coin-operated use.

**Corr. ID:** 312 **Organization:** *Not Specified*

**Comment ID:** 126423 **Organization Type:** Unaffiliated Individual

**Representative Quote:** I would also like to see at least one drainage along the Mammoth-Looke City Road open to winter camping, especially during wintertime it is hard to snowshoe or ski very far without being able to winter camp. The EIS should address opportunities for winter recreation other than sightseeing - wildlife viewing.

**Corr. ID:** 891 **Organization:** *Not Specified*

**Comment ID:** 127708 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Winter in Yellowstone does offer distinctive opportunities from those of other seasons. But some values, such as quietude, are fragile and can easily be lost when quantity of visitation is strived for, rather than quality of visitor experience. Therefore, I suggest daytime visitor use be strictly limited. Day trips on snowmobiles, either guided or unguided can be better accommodated on maintained US Forest Service, and private lands outside the national park. Overnight visitor use should be limited by the park concessionaire reduced winter accommodations, such as Old Faithful. These would be by reservation, and serviced by Snowcoach, from Mammoth. Very limited sightseeing trips by Snowcoach may be permitted.

**Concern ID:** 23705

**CONCERN STATEMENT:**

Commenters suggested that OSV use occur with a guide and that training be provided to OSV users.

**Representative Quote(s):** **Corr. ID:** 2 **Organization:** CNPSR NPCA

**Comment ID:** 126963 **Organization Type:** Unaffiliated Individual

**Representative Quote:** If ANY individual snowmobiles ARE permitted in some 'phase-out' period (which I do NOT recommend), they should only be allowed if specifically in control and guided by professional NPS personnel.

**Corr. ID:** 371 **Organization:** please uncheck member

**Comment ID:** 126658 **Organization Type:** Unaffiliated Individual

**Representative Quote:** One drawback to snowmobiles is the lack of education--people drive through without being able to contact their guide with questions as they arise. I would like to see a requirement of headsets/speakers so that when people leave a snowmobile trip, they will have learned more about Yellowstone. I am assuming here that snowmobile guides receive interpretive training--if not, then that should be an added requirement.

**Corr. ID:** 844 **Organization:** *Not Specified*

**Comment ID:** 127410 **Organization Type:** Unaffiliated Individual

**Representative Quote:** I am reminded that before I was allowed to overnight in the backcountry of Glacier NP, I had to watch an instructional video mainly about wildlife encounters. I would love to see a similar video for winter visitors of Yellowstone. I've seen people file off a snow coach and approach animals spooking them away in a matter of a few minutes, while I kept my group on the road next to their snow machines with little effect to the wildlife. I think that input from the NPS Law Enforcement, Wildlife Researchers, and Interpretive Rangers would be critical to making a quality video for the winter visitors to have the safest experience. I would also like to see more mandatory yearly training/ meeting for every guide in the park just to get everyone on the same page each year. The issues that occur could be prevented if a set of standards are discussed in great detail prior to the season.

**Corr. ID:** 844 **Organization:** *Not Specified*

**Comment ID:** 127418 **Organization Type:** Unaffiliated Individual

**Representative Quote:** I would like to see a prerequisite of at least one day of experience on a sled before the possibilities of a park visit are given to the guest. Issues such as not being used to the cold, handling the machine, keeping up with the group, driving with others on the road, turning off the machine as soon as you stop, wildlife encounters, how to pack your stuff, etc; would be better learned before entering such a special place like Yellowstone. Maybe this could be accomplished with a short training video to accompany the wildlife video I mentioned earlier.

**Corr. ID:** 1050      **Organization:** navy

**Comment ID:** 126292      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Maybe the few people found not upholding the rules and regs during the winter season should be held accountable. Maybe have a form they have to fill out so they know, what not to do, what to do, and what the consequences will be if disobeying.

**Corr. ID:** 1667      **Organization:** *Not Specified*

**Comment ID:** 130126      **Organization Type:** Unaffiliated Individual

**Representative Quote:** REQUIRE (AS POSSIBLE) ALL VISITORS TO GO THROUGH SHORT PARK EDUCATION ORIENTATION. POSSIBLY PROVIDED BY CLOSED RADIO WITH SIGNAGE NOTING WHEN ORIENTATION BEGINS - TURN ON YOUR RADIO. THERE ARE NUMEROUS COST-CONSERVATIVE METHODS TO ACHIEVE THIS.

**Concern ID:** 23708

**CONCERN STATEMENT:**

One commenter requested that more grooming occur and that more snow be stored to be used later in the season.

**Representative Quote(s):** **Corr. ID:** 844      **Organization:** *Not Specified*

**Comment ID:** 127419      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Park operations and maintenance seem to do well with what they are given. The only thing I would like to see is more grooming in the most used areas, and if it exists, a way to store snow for later use on the roads when the snow starts to melt around Old Faithful, the most visited area in the park.

**Concern ID:** 23709

**CONCERN STATEMENT:**

Commenters suggested that the speed limit be changed to 45 mph for OSV use.

**Representative Quote(s):** **Corr. ID:** 144      **Organization:** *Not Specified*

**Comment ID:** 129491      **Organization Type:** Unaffiliated Individual

**Representative Quote:** You have done several EIS's in the last few years that all show snowmobiles are detrimental to the park environment as currently used. You need to just get serious and revise the management plan to eliminate the negative impacts. Do that by requiring all snowmobiles to be quieter and have no higher emissions than modern cars. In other words meet latest federal standards for automobiles. Require this for all speeds up to the park limit of 45 mph. Limit all oversnow vehicles including snow coaches to these same standards. In this manner oversnow vehicles should have no greater impact than cars in the summer, especially since the winter numbers are so much smaller.

**Corr. ID:** 1341      **Organization:** *Not Specified*

**Comment ID:** 127265      **Organization Type:** Unaffiliated Individual

**Representative Quote:** The rules for snowmobile use in the Park should remain as they have been in the past. A 45mph speed limit and strict enforcement by Park Rangers of the requirement to stay on the roads. (The roads are a tiny percentage of the total Park)

**Concern ID:** 23710

**CONCERN STATEMENT:** Commenters suggested that OSV use be limited to administrative use only.

**Representative Quote(s):** **Corr. ID:** 212 **Organization:** *Not Specified*

**Comment ID:** 126917 **Organization Type:** Unaffiliated Individual

**Representative Quote:** I think snowmobiles should be used only for Ranger patrols and rescue operations in National Parks.

**Corr. ID:** 245 **Organization:** *Not Specified*

**Comment ID:** 127320 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Snowmobile use in Yellowstone National Park SHOULD BE LIMITED TO THOSE NEEDED BY PARK PERSONNEL in the normal pursuit of their duties: administrative, scientific, rescue and the like.

**Corr. ID:** 321 **Organization:** *Not Specified*

**Comment ID:** 126448 **Organization Type:** Unaffiliated Individual

**Representative Quote:** The EIS should examine an alternative which would limit visitor access by oversnow vehicle to the Old Faithful Area from West Yellowstone and the South Entrance. Such an alternative would allow continued administrative oversnow access on remaining YNP roads on an as-needed groomed surface.

**Concern ID:** 23713

**CONCERN STATEMENT:** One commenter suggested that the park post the road conditions of Mammoth Road on a website.

**Representative Quote(s):** **Corr. ID:** 312 **Organization:** *Not Specified*

**Comment ID:** 126424 **Organization Type:** Unaffiliated Individual

**Representative Quote:** As a user of Mammoth Road, I would like to see more current road information/conditions provided through the website similar to that provided by the Montana Highway Department.

**Concern ID:** 23715

**CONCERN STATEMENT:** Commenters suggested vehicle requirements for OSV including emissions tests and banning high powered machines.

**Representative Quote(s):** **Corr. ID:** 237 **Organization:** *Not Specified*

**Comment ID:** 127334 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Allow any four stroke on official lists of approved machines. Ban high powered machines that can go off the trail or can utilize excessive speed.

**Corr. ID:** 1130 **Organization:** BlueRibbonCoalition/SAWS/WSSA

**Comment ID:** 127952 **Organization Type:** Unaffiliated Individual

**Representative Quote:** A fair (unfortunately this is not about being fair to the public) and realistic method of controlling the amount of pollution being release into the Park's environment would involve performing an emission test on the vehicles entering the park during a summer weekend, then repeating the emission testing on the snowmobiles allowed into the Park on a winter weekend. This would provide a comparative yardstick

to fairly adjust the motorized pollution during the Park on a year around basis. Of course we all know this will never happen because the uproar created by the summer motorized users would result in discrimination claims being brought against the NPS. It is unfortunate that the NPS chooses to restrict the enjoyment of the Park to some of the people when the Park is suppose to be "For the Benefit and Enjoyment of the People".

**Concern ID:** 23718

**CONCERN STATEMENT:**

Commenters suggested ways in which advances in technology could be incorporated into the Winter Use Plan. Suggestions included use of web cams to see more areas of the park, creating a plan that allows technology to be implemented in a timelier manner, and implementing technologies from the Clean Snow Competition.

**Representative Quote(s):** **Corr. ID:** 1168 **Organization:** Michigan Tech Clean Snowmobile Team Alumni

**Comment ID:** 126570 **Organization Type:** Unaffiliated Individual

**Representative Quote:** I ask that you don't close the park off to snowmobiles, but put your resources into nudging snowmobile OEM's into implementing technologies used at the SAE Clean Snow Competition.

If snowmobiles were manufactured to run as clean as cars would you still ban them from the park?

**Corr. ID:** 1524 **Organization:** *Not Specified*

**Comment ID:** 128269 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Try to state your plan in a way that allows for new ideas and technology so that better ideas can be implemented more quickly. It seems to me that the number limit on snowmobiles and snowcoaches is not necessary. Using set numbers means someone chooses the haves and have nots and requires a whole bureaucracy to administer. It can also create ill-will in the community if allotments are perceived to be unfair. This time and money could be used for better things.

**Corr. ID:** 1679 **Organization:** *Not Specified*

**Comment ID:** 130137 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Internet access and technology is improving at such a fast rate worldwide I was wondering if a series of web cams could be set up going upstream on a creek or river here or there or on a trail which could be accessed at will by a wide audience able to interact and control virtual travel through the park. That would be particularly cool if it caught on around the world and other places adopted such an idea too. It would be nice for people who might have a hard time getting out to wild places. They could go with a click of the mouse and see what's happening in such a beautiful place and tell others of any wildlife they see or of beautiful scenes.

**Concern ID:** 23720

**CONCERN STATEMENT:**

One commenter requested that the West Yellowstone airport be kept open during the winter.

**Representative Quote(s):** **Corr. ID:** 1183 **Organization:** *Not Specified*

**Comment ID:** 128125 **Organization Type:** Unaffiliated Individual

**Representative Quote:** I feel to enhance access from the West entrance West Yellowstone Airport should be included in the plan to be kept open during the winter.

**Concern ID:** 23721

**CONCERN STATEMENT:**

Commenters requested an alternative that includes more machine-groomed non-motorized trails around Old Faithful, with specific suggestions of what these trails would look like.

**Representative Quote(s):** **Corr. ID:** 1502 **Organization:** Friends of Pathways

**Comment ID:** 128480 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Specific Recommendations that should be studied in the Yellowstone Winter Use Plan EIS alternatives:

- Include an alternative with more machine-groomed non-motorized trails around Old Faithful. The Park Service should include and analyze options for the Old Faithful area to offer visitors up to the range of 30 km of machine-groomed ski, bike and walking trails. For example, a separate groomed trail parallel to the snowmobile trail should connect to the Lone Star Geyser groomed trail, so non-motorized visitors can make a safe round trip from the Snow Lodge without being forced to use the snowmobile road.

- The Park Service should study in at least one alternative adding 10-15 KM for appropriate machine-groomed non-motorized Nordic tracks at Canyon with public Snow Coach access to enjoy.

- The Park Service should study 10-15 KM appropriate for machine-groomed non-motorized Nordic tracks at Lake with public Snow Coach access to enjoy.

**Corr. ID:** 1502 **Organization:** Friends of Pathways

**Comment ID:** 128491 **Organization Type:** Unaffiliated Individual

**Representative Quote:** FOP would like to clarify that analyzing machine-grooming for non-motorized visitors in the EIS is needed only near major developed areas where there is significant visitor interest in seeing major park attractions, and where groomed trails will have low impacts. The vast majority of the park off the roadways should continue to be non-groomed for remote non-motorized backcountry use. FOP proposes grooming on roads, administrative roads, non-motorized pathways and trails, and appropriate locations that do not adversely impact resources.

**Concern ID:** 23722

**CONCERN STATEMENT:**

One commenter requested that concessionaire permits be provided for a longer period, at least six years.

**Representative Quote(s):** **Corr. ID:** 1531 **Organization:** Cody Country Chamber of Commerce

**Comment ID:** 129382 **Organization Type:** Town or City Government

**Representative Quote:** Concessionaire Permits

We recommend that you assess allowing permits to qualified concessionaires for at least a six-year period permit cycle. A longer permit period would encourage and provide incentive to concessionaires to invest more in their business through additional marketing and purchases of newer equipment because they can count on having the permit. In addition, we recommend that you analyze the impact of extending the season by one week at the beginning and by one week at the end, or at least building in flexibility to the length of the season depending on weather and snow pack. This would allow for a more economically viable season for snowmobile and snow coach outfitters and would allow for more people to enjoy the Park in the winter.

**Concern ID:** 23723

**CONCERN STATEMENT:** One commenter suggested that Yellowstone enroll in the Wyoming State Trails program for snowmobiles.

**Representative Quote(s):** **Corr. ID:** 1588 **Organization:** State of Wyoming- Department of State Parks and Cultural Resources

**Comment ID:** 129630 **Organization Type:** State Government

**Representative Quote:** 6. Enroll YNP Snowmobile Routes in the Wyoming State Trails Program - we believe the issues presented about operations could easily be addressed if YNP was willing to enroll their snowmobile trail routes into our State Trails Program. We have success on other Federal Partners' trails and continue to provide world class service.

**Concern ID:** 23724

**CONCERN STATEMENT:** Commenters requested that the Continental Divide Snowmobile trail remain open.

**Representative Quote(s):** **Corr. ID:** 179 **Organization:** Not Specified

**Comment ID:** 129237 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Give back the Continental Divide Snowmobile Trail to the people- allow EPA compliant 2-stroke machines to utilize this historic trail through the parkway and parks.

**Corr. ID:** 1588 **Organization:** State of Wyoming- Department of State Parks and Cultural Resources

**Comment ID:** 129798 **Organization Type:** State Government

**Representative Quote:** Continental Divide Snowmobile Trail:  
We are very concerned about the continued viability of the Continental Divide Snowmobile Trail (CDST). Snowmobile use has become nearly extinct on this important inter-state connection. Snowmobiles visits as of 200 averaged zero per day and not substantially above zero for the entire season. This has been driven by the overbearing and unjustified NPS rule that allows only BAT snowmobiles to travel this route through Grand Teton and the Parkway - even though it is located within the right-of-way of a plowed highway with concurrent automobile, truck, and bus traffic. This simply makes no sense.

We believe it is critical to remember the context in which this trail route was initially established: an opportunity for long-distance snowmobile trail touring between Lander, Wyoming and West Wyoming, Montana. It was important economic development initiative that involved three states: Wyoming, Idaho, and Montana. This long-distance trail was never approved as a trail through Yellowstone National Park to reach West Yellowstone. Rather, the official CDST touring route has always been from Lander across the Shoshone and Bridger-Teton National Forests in Wyoming, through Grand Teton and the Parkway alongside the plowed roadway to Flagg Ranch, on the Grassy Lake Road in the Parkway, and then across the Targhee and Gallatin National Forests in Idaho and Montana to West Yellowstone. The requirement for BAT snowmobiles on the CDST has essentially destroyed any opportunity for inter-state trail touring since BAY



snowmobiles are not typical of snowmobiles used in the adjacent national forest settings.

**Corr. ID:** 1588                      **Organization:** State of Wyoming- Department of State Parks and Cultural Resources

**Comment ID:** 129799            **Organization Type:** State Government

**Representative Quote:** Table 2 on page 11 and accompanying maps on pages 12-14 illustrate snowmobile counter data and locations for the Continental Divide Snowmobile Trail for the 1999-2000 through 2003-2004 winter seasons (the most recent statistics readily available. This data was collected by out Wyoming State Trails Program staff, in partnership with local forest district personnel, through the use of infrared trail counters at selected sites for CDST monitoring and information collection.

You will note that this trail across the Shoshone and Bridger-Teton National Forests in Wyoming is a popular and heavily used venue. While it receives steady use from east (the Lander area) to west (the Togwotee/Black Rock area), use generally increases as you move westward. The Squaw Basin, Togwotee, and Hatchet counters are all located west of the Continental Divide and consistently record some of the highest traffic counts. Daily counts for the whole trail system range from 121 to 163 snowmobiles per day, while daily averages towards the west ends of the trail can be over 300 snowmobiles per day. While not all of these snowmobilers regularly traverse the entire length of the CDST across both forests, a good number of groups do. And many of these groups tour their CDST trip as one of their 'lifetime snowmobiling experiences.'

The CDST is an extremely unique and special snowmobiling experience that we're trying to keep intact so that future groups don't have to dead-end their trips at Black Rock - but can instead continue across GTNP, JDR, and then national forest trails into Idaho and eventually end up at West Yellowstone, Montana. These through-trips are important - and don't require a large number of daily snowmobile entries to accommodate.

[Hard copy letter contained Table 2: CDST Snowmobile Use Figures on the Shoshone and Bridger-Teton National Forests].

[Hard copy letter contained Maps showing the Continental Divide Snowmobiles Trail]

**Concern ID:** 23725

**CONCERN STATEMENT:** Commenters requested increased coordination with the community and other interest groups in the development of alternatives, with one commenter suggesting groups to be consulted with.

**Representative Quote(s):** **Corr. ID:** 280                      **Organization:** CUFF

**Comment ID:** 127936            **Organization Type:** Unaffiliated Individual

**Representative Quote:** An alternative developed by snowmobile enthusiasts and organizations that allow snowmobiling in the park to meet their needs, whatever that is.

**Corr. ID:** 280                      **Organization:** CUFF

**Comment ID:** 127937            **Organization Type:** Unaffiliated Individual

**Representative Quote:** An alternative developed by commercial businesses and local officials in the communities surrounding the park. This would be based on the use that they can comfortably accommodate and manage.

**Corr. ID:** 280                      **Organization:** CUFF

**Comment ID:** 127933            **Organization Type:** Unaffiliated Individual

**Representative Quote:** The Winter Use Planning Rule could promote greater "buy in" by the public if the rule allowed the public to actually have a say in the selection of the final alternative.

These are, after all, public lands. They are owned and paid for by the American people, not the Park Service. The public should have a say in how the public lands are managed.

It goes without saying that the Park Service (PS) has the legal obligation to select the final Winter Use alternative for the park. But that does not mean the Service must always select between its own "preferred" alternative and another alternative that may be supported by some segment of the local population. The PS could choose between one alternative, supported by one segment of the population, that drives management of winter recreation in one direction verses selecting another alternative, supported by another segment of the public that drives management of winter recreation in another direction. The selected alternative would be the one that allows the maximum use of different recreation types in the park during the winter while having the least impact on the resources of the park (like wildlife, air quality and economics, to name a few).

By not having a "preferred alternative" in the mix the agency would not be perceived as having a "dog in the fight" so to speak. In other words, the PS would be selecting between two or more locally-derived alternatives that come from people who live and work on the ground and have a strong tie to the land. The loser may not be totally satisfied with the agency decision, but at least it would be a locally-derived solution, not a government-sponsored, government-knows best dictum. This could result in a better chance of public buy-in of the Rule.

**Corr. ID:** 955                      **Organization:** *Not Specified*

**Comment ID:** 127601      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Involve people who live and do business in and adjacent to Yellowstone, directly in writing winter use rules.

**Concern ID:** 23727

**CONCERN STATEMENT:** [One commenter suggested the park could remain open in the winter but post times when no services are available.](#)

**Representative Quote(s):** **Corr. ID:** 104                      **Organization:** *Not Specified*

**Comment ID:** 126906      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Slow periods could be signed "No Services Available". This would take uncertainty out of a winter season because the park would always be open. The Park Service has a staff on the West Side of the Park to handle this. Maybe not every Ranger has to be gone from the Park at the same time.

**Concern ID:** 23728

**CONCERN STATEMENT:** [One commenter suggested limiting backcountry use in the winter.](#)

**Representative Quote(s):** **Corr. ID:** 891                      **Organization:** *Not Specified*

**Comment ID:** 127701      **Organization Type:** Unaffiliated Individual

**Representative Quote:** For safety concerns, I suggest winter 'backcountry' use be restricted to established roads; 'day use' could occur on trails in, or around developed park areas such as Mammoth Temporary development would be required for the backcountry use under this option. There will be the need for modular huts for overnight

use. These shelters could be modular units and removed, and stored after winter use. Of course, backcountry permits would be required for designated huts, and parties would be required to carry sleeping bags, food, cooking gear, and safety items, perhaps including cell phone. A user fee, of course, should be charged for use of the huts.

### **AQ2000 - Air Quality: Methodology And Assumptions**

**Concern ID:** 23729

**CONCERN STATEMENT:** Commenters requested that the plan/EIS analysis include the impact of snowmobiles on air quality. They requested snowmobiles vs. no snowmobiles be examined, as well as snowmobiles vs. snowcoaches and a cumulative impacts analysis.

**Representative Quote(s):** **Corr. ID:** 367 **Organization:** Snowlands Network

**Comment ID:** 126647 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Since you are in the scoping phase for a Winter Use Plan Environmental Impact Statement You need to know what I think this EIS should have it. The EIS should have and analysis of what the air and noise quality with and without snowmobiles. It should have what the impact of these machines have on wildlife in the park. The EIS should discuss the presence that it would set in other National Parks since snowmobiles are usually not allowed in the National Parks. There should be a discussion of using Snow coaches vs snowmobiles, comparing the noise, multiple age use, the carbon footprint disruption to wildlife, cost and the how much of a safety issue are they when there are snow shoes, cross country skiers and wildlife using the paths provided by snow covered roads.

**Corr. ID:** 1423 **Organization:** Rock the Earth

**Comment ID:** 128862 **Organization Type:** Unaffiliated Individual

**Representative Quote:** IV. The Negative Impact that Snowmobiles Have on Air Quality Warrants the Implementation of a Policy Prohibiting Snowmobile Use in the Parks.

As was demonstrated in the 2000 FEIS and 2000 ROD, the effect of snowmobile emissions on air quality was identified as a primary concern for visitors, with respect to health, natural resources, and aesthetic and wilderness values. For example, on high snowmobile use days in Yellowstone National Park, the visual evidence and odor of snowmobile exhaust was apparent in some areas. In selecting the original alternative in the 2000 FEIS banning snowmobiles from the Parks by 2003-2004, the NPS concluded that there would be major beneficial effects in air quality in the Parks.

**Corr. ID:** 1531 **Organization:** Cody Country Chamber of Commerce

**Comment ID:** 129383 **Organization Type:** Town or City Government

**Representative Quote:** Snowmobile and Snow Coach Comparison

We recommend that you evaluate the impact emissions and fuel use of snow coaches and compare that impact to snowmobile emissions and fuel use as a way to determine the overall lowest impact of over-snow vehicles. For example, we suggest you analyze how much fuel it takes for a snow coach to travel from the East Entrance to Old Faithful, how many people the coach transports, and how much extra grooming is needed after a snow coach uses a road, and compare that to the fuel used, people provided access, and grooming needs of snowmobiles. In addition, we recommend that you analyze the impact of snow coach breakdowns and compare that to snowmobile breakdowns. Another area of analysis that we recommend is the impact of allowing snowmobiles to access the North Rim Drive of the Canon before noon. From the East Entrance, travelers frequently reach the Canyon before noon on the way to Old Faithful, and this would allow these

visitors access to this beautiful area on the way.

**Corr. ID:** 1573

**Organization:** Wyoming Outdoor Council

**Comment ID:** 129301

**Organization Type:** Civic Groups

**Representative Quote:** While the Park Service has taken some positive steps in recent years such that emissions have decreased from pre-2000 levels, we remain concerned that over-snow vehicle use - whether by snowmobile or outmoded snowcoach - remains a significant threat to air quality in these Class I areas. As Judge Sullivan noted in his recent opinion, even though the actual daily snowmobile use over the past several winters "has averaged only between 260-290 snowmobiles" this lower figure still "exceed[s]" the "NPS's own thresholds for noise and air pollution." Greater Yellowstone Coalition v. Kempthorne, --- F.Supp.2d---, 2008 WL 419133 (D.D.C. 2008). For this reason, the judge questioned and ultimately struck down the Park Service's decision to allow 540 snowmobiles a day to enter the park. Id. Under this same rationale, the present proposal to allow 318 snowmobiles a day (and 78 snowcoaches) to enter the park will fall short of remedying the air pollution problems. We believe the Park Service should strive to adopt a new plan that offers greater protection for air quality related values.

**Corr. ID:** 1573

**Organization:** Wyoming Outdoor Council

**Comment ID:** 129302

**Organization Type:** Civic Groups

**Representative Quote:** We urge the Park Service to err on the side of protecting air quality related values - especially in cases like this one where it has the ultimate authority to do so. The Park Service's policy is clear. In the case of a conflict between "enjoyment" and "conservation" of park resources and values, "conservation is to be predominant." NPS Management Policies, 2006, Section 1.4.3 (Attachment 6), We also urge the Park Service to consider the cumulative impacts to air quality from various levels of over-snow vehicle use coupled with the projected impacts to the parks' air quality from oil and gas development in the southern part of the GYE and other sources. Additional sources of pollution should be considered in any decision-making process such as this one where air quality is already a significant issue.

**Concern ID:** 23730

**CONCERN STATEMENT:** Commenters requested that the EIS analysis of air quality compare winter use and summer use.

**Representative Quote(s):** **Corr. ID:** 140

**Organization:** *Not Specified*

**Comment ID:** 129512

**Organization Type:** Unaffiliated Individual

**Representative Quote:** I encourage careful comparison of summer and winter environments. There is a small amount of air pollution tolerated during the summer months by thousands of automobiles in the park. A small amount of air pollution should also be tolerated in the winter. Animals are distracted--even harassed--by throngs of photographers that clog the park roads all summer long. Animals, similarly, may experience a small degree of human intrusion in the winter months. As a committee, you will have access to data the public will not see. Study the data carefully for us. I implore you, where minimal long-term environmental risk exists, select options that allow visitation opportunities to be maximized.

**Corr. ID:** 1546

**Organization:** *Not Specified*

**Comment ID:** 129434

**Organization Type:** Unaffiliated Individual

**Representative Quote:** While snowmobile air pollution is emphasized, we are not told that even newer snowcoaches emit substantially higher emissions than snowmobiles. No one mentions summer Recreational Vehicles (RVs) produce eight times more Nitrous Oxides than all the allowed snowmobiles and snowcoaches combined. Nor do they

disclose that snowcoaches and snowmobiles emit less than 6 percent of the total particles discharged annually in the Park.

**Concern ID:** 23733

**CONCERN STATEMENT:** Commenters noted improvements in snowmobile technology in recent years. They suggested that the NPS segregate this new technology in its analysis and offered sources of information they felt the NPS should consult in its analysis.

**Representative Quote(s):** **Corr. ID:** 1435 **Organization:** Michigan Tech Keweenaw Research Center

**Comment ID:** 128944 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Some thoughts related to Emissions:

In CSC 2007, the University of Idaho proved that a practical 2-stroke could be made clean and quiet by winning the competition. In years previous, 4-stroke sleds coupled with exhaust catalysts were the only solution to beating the 2012 emissions standards. The Direct-Injected (DI) Ski-Doo is now standard in both a 600 cc and 800 cc model this year.

Exhaust catalyst companies have embraced CSC and help the student teams engineer practical solutions. Here is an example of how this may translate into value for NPS. Rules are changed each year to change the game and keep the competition fresh. We have investigated various fuels (E22, E55, E85, and Bio-diesel). The competition goals could be modified to develop a "kit" to reduce emissions and noise for employee's snowmobiles (for those on the interior). Not all machines are trail machines, and sometimes must break trail or provide emergency assistance. Some of the ideas that have emerged, especially the add-on catalysts developed for the different models have promise. Although a small market this might make for a valuable "real world" objective for the competition which is usually directed towards trail sleds only.

There may be a way that results could also help develop emissions and NOISE reduction methods for historic and existing snowcoaches. Noise and vibration in snowcoaches need A LOT of work, and some of the teams might be better at it than others--at least in the approach.

**Corr. ID:** 1492 **Organization:** CNPSR et al

**Comment ID:** 128671 **Organization Type:** Unaffiliated Individual

**Representative Quote:** A. Trends in Oversnow Vehicle Performance

#### 1. Regression of Snowmobile Technology

In assessing the potential impacts of all available alternatives over the long-term, NPS's new environmental impact statement should evaluate recent trends in snowcoach and snowmobile performance. Since 2003, the trend line in the environmental performance of best-available-technology snowmobiles has been toward greater emissions and noise--the opposite of what the snowmobile industry promised and NPS anticipated in prior analyses. (A chart appended to these comments, "Best Available Technology Snowmobiles, 2003-2010," summarizes NPS's important statements concerning this trend.)

**Corr. ID:** 1492 **Organization:** CNPSR et al

**Comment ID:** 128672 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Regression in BAT snowmobile performance is clearly reflected in NPS's October 30, 2009 "Snowmobile Best Available Technology (BAT) List"

(available at [http://www.nps.gov/yell/parkmgmt/current\\_batlist.htm](http://www.nps.gov/yell/parkmgmt/current_batlist.htm)), which discloses, year by year, the hydrocarbon, carbon monoxide, and sound emissions of snowmobile models certified for use in Yellowstone. This document shows that the hydrocarbon emissions of manufacturers' 2010 models, though within Yellowstone's BAT standard, are approximately double the emissions of certified 2004 models. The list reflects that carbon monoxide emissions have increased 25 to 30 percent over the same six-year period, and have now reached Yellowstone's BAT limit.

**Corr. ID:** 1492

**Organization:** CNPSR et al

**Comment ID:** 128675

**Organization Type:** Unaffiliated Individual

**Representative Quote:** Under new leadership, NPS is now focused on using the "best available sound science" to achieve a sustainable long-term winter use plan for Yellowstone. (Scoping News Release.) A central part of the agency's environmental analysis will likely be the modeling of management alternatives, allowing NPS to better understand their potential impacts on park resources and values. Such modeling will require fair assumptions about what technology NPS can reasonably expect to be available in years to come. We urge NPS to use emissions factors that take into account the regression in the environmental performance of snowmobiles that has occurred since Yellowstone established its BAT requirements. A long-term plan to assure Yellowstone's conservation should not be based on the air and sound emissions of snowmobiles the industry no longer makes.

**Corr. ID:** 1492

**Organization:** CNPSR et al

**Comment ID:** 128677

**Organization Type:** Unaffiliated Individual

**Representative Quote:** The new EIS should assess as accurately as possible how "best-available-technology" snowcoaches would contribute to the conservation of Yellowstone's resources and values. To accomplish this, NPS's analysis should use emissions and noise values for snowcoaches that reflect EPA's new, tighter standards.

**Corr. ID:** 1492

**Organization:** CNPSR et al

**Comment ID:** 128676

**Organization Type:** Unaffiliated Individual

**Representative Quote:** 2. Improving Snowcoach Technology

Since NPS last modeled winter-use management alternatives in its 2007 EIS, the Environmental Protection Agency's "Tier II" emissions standards for light-duty trucks have been implemented. EPA has also tightened emissions requirements for diesel engines. As a result, NPS is now in a position to assess "best-available-technology" snowcoaches that outperform those identified in prior evaluations as the least-impacting vehicles.

NPS's recent assertion that snowmobiles and snowcoaches are "now very similar in their per passenger emissions" is not based on a comparison of best-available-technology machines. (2009 FONSI at 18.) Rather, the assertion rests on emissions measurements from a cross section of vehicles in the current fleet operating in Yellowstone. This fleet is unevenly composed of best-available-technology snowmobiles, on the one hand, and a mix of historic and newer-engine snowcoaches, on the other. It is clear that snowcoach engines produced after 2001 are markedly cleaner than those produced prior to 2001. Now, EPA expects that Tier II and diesel standards will result in further significant reductions in emissions. Because Yellowstone's current vehicle fleet is comprised of best-available-technology snowmobiles and many less-than-best-available-technology snowcoaches, this assessment becomes an apples-to-oranges comparison that cannot provide a reasonable basis for the agency's long-term winter use plan.

**Corr. ID:** 1517

**Organization:** *Not Specified*

**Comment ID:** 128310      **Organization Type:** Unaffiliated Individual

**Representative Quote:** New Versus Old Technology:

I ask the Park Service to carefully segregate new technology from old in modeling alternatives and presenting data. As someone who has invested significantly in modern snowcoaches that I have specifically designed for Yellowstone's environment, road conditions and visitor experience, I know that there is simply no valid comparison between their design features, the resulting performance of my engines and tracks, and the experiences I am able to provide to visitors -- and what results, on the other hand, with outdated snowcoaches or poorly-designed, modern snowcoaches. It is no more valid to make generalizations among modern snowcoaches (because some are poorly designed, improperly-g geared and so forth) than it is to generalize between modern and historic snowcoaches. I am aware that past studies have consistently shown environmental benefits of snowcoaches when compared to snowmobiles. Based on my 30 years of experience with both snowmobile and snowcoach technology, I have absolutely no doubt that the newest emissions standards for both gasoline and diesel snowcoaches have only accentuated these differences. I ask that you not penalize those, like me, who have invested in well-designed modern snowcoaches and want to acquire additional, even cleaner snowcoaches, by obscuring their benefits through misleading generalization, rather than carefully segregating analysis of new and old snowcoach technology.

**Concern ID:** 23736

**CONCERN STATEMENT:** Commenters suggested that the air quality analysis use information provided by Dr. Bishop in his 2006 publication, "In Use Emissions."

**Representative Quote(s):**      **Corr. ID:** 1494      **Organization:** CNPSR et al

**Comment ID:** 128555      **Organization Type:** Unaffiliated Individual

**Representative Quote:** G. Fuel Economy

NPS has recently stated that "average snowmobile fuel efficiency was found to be 25.1 mpg" and that this was "computed using the data obtained by Bishop et al. 2006 and Bishop et al. 2007." (2008 EA at 3-79.) Inasmuch as this fuel economy figure has been used in everything from calculations of "per-visitor" impacts, to comparisons of the impacts of snowmobiles and snowcoaches, to carbon emissions and climate change assessments, we urge its verification. We note that Dr. Bishop wrote to NPS and specifically cautioned that, "Measuring fuel economy was not a direct task on the emissions project report that you have seen. Therefore we have not made a real attempt to measure that number with any accuracy." (AR 124992.) Dr. Bishop also noted that the limited fuel economy data he came up with was based only on short drives involving three snowmobiles--drives that did not involve "additional riders" and "did not include much starting and stopping." He concluded, "If you have kept a record of fuel economy for some of the sleds you have used I'd [be] very interested in [it] because that number is very important to know when comparing emissions with the snowcoaches." (AR 124992.)

**Corr. ID:** 1589      **Organization:** Montana Fish, Wildlife, and Parks

**Comment ID:** 129845      **Organization Type:** State Government

**Representative Quote:** Montana recommends use of the data from Dr. Bishop's 2006 "In Use Emissions" of over-snow vehicles. We would also recommend requiring use of Tier II or better emissions control equipment in non-historic snowcoaches.

**Concern ID:** 23739

**CONCERN STATEMENT:** Commenters suggested modeling that should be completed for the air quality analysis in the plan/EIS. Suggestions included developing an Air Quality Monitoring Protocol that is vetted with an air quality working group, use of appropriate BAT emission factors for snowcoaches, and include a detailed discussion of historic air quality monitoring conducted in the park.

**Representative Quote(s):** **Corr. ID:** 1688 **Organization:** United States Environmental Protection Agency

**Comment ID:** 130302 **Organization Type:** Conservation/Preservation

**Representative Quote:** Regarding snowcoaches, the NPS has defined a BAT approach to reduce snowcoach impacts in each of the past NEPA processes. To support this EIS process, the NPS has completed additional studies that further enhance the understanding of snowcoach performance and associated impacts under various technologies. Based on these studies and on EPA's understanding of current engine and emission control technology, we expect marked environmental performance improvements as older snowcoaches are replaced by today's engines and emission-control technology. Current engine technology and emission controls may completely eliminate excursions into open-loop (uncontrolled-emissions) mode, even when snowcoaches are operating under heavy load. These excursions result in tremendous increases in vehicle emissions and may also be a source of higher noise events with snowcoaches. Additionally, EPA's requirements for diesel engines and diesel fuel will significantly reduce emissions from the diesel-powered snowcoaches compared to older technology. A modernized BAT snowcoach fleet would improve fuel efficiency, and significantly reduce greenhouse gas and pollutant emissions on a per-passenger basis, and may also reduce soundscape impacts. In order to assess the potential improvement available from implementing snowcoach BAT, it is important that the NPS select BAT emission factors that reflect the engine and emission control technologies that are currently available from original equipment vehicle manufacturers and conversion companies.

**Corr. ID:** 1688 **Organization:** United States Environmental Protection Agency

**Comment ID:** 130300 **Organization Type:** Conservation/Preservation

**Representative Quote:** In preparing the EIS, EPA recommends that the approach used by the NPS to analyze and predict air quality impacts be documented in an Air Quality Modeling Protocol and be fully vetted with the air quality workgroup. An Air Quality Modeling Protocol provides a "roadmap" for how the air analysis will be conducted and the results presented. It describes the model that will be used for analysis, including model settings, modeling boundaries, and important model inputs such as meteorology, background data, and emission inventories. The Protocol should also generally describe the standards and thresholds to which the air impact results will be compared. EPA recommends that a Draft Air Quality Modeling Protocol be circulated among the air quality workgroup for comment and discussion. As part of this discussion, EPA recommends workgroup members discuss and reach agreement on the emission inventories that will be used and the alternatives that will be modeled. EPA suggests that the NPS work with the air quality workgroup to obtain written concurrence from each member on the Protocol prior to proceeding with the air quality analysis. If significant disagreements persist, EPA recommends those issues be elevated within the respective agencies for resolution. By discussing the model, emission inventories and alternatives up front, the NPS may avoid additional costly and time consuming air quality modeling analysis revisions at a later date.



**Corr. ID:** 1688                      **Organization:** United States Environmental Protection Agency

**Comment ID:** 130301            **Organization Type:** Conservation/Preservation

**Representative Quote:** The October 30, 2009, "Snowmobile Best Available Technology (BAT) List" ([http://www.nps.gov/yell/parkmgmt/current\\_batlist.htm](http://www.nps.gov/yell/parkmgmt/current_batlist.htm)) shows that from 2004 to 2009, the carbon monoxide and hydrocarbon emissions from the BAT snowmobile fleet have been steadily increasing towards Yellowstone's current emission limits, which were implemented in 2004. For example, in 2009 all of the BAT snowmobiles were certified at, or exceeding, the Yellowstone carbon monoxide limit of 120 g/kW-hr. The EIS should therefore use the existing BAT snowmobile emission limits as the emission factors in the air impact modeling analysis.

**Corr. ID:** 1688                      **Organization:** United States Environmental Protection Agency

**Comment ID:** 130298            **Organization Type:** Conservation/Preservation

**Representative Quote:** The Adaptive Management Plan (AMP) in the 2008 Environmental Assessment includes air quality thresholds for road corridors and indicates that monitoring will occur "monthly to seasonally and during peak days or use periods." The NPS's air monitoring reports for the past two seasons of winter use do not appear to include air quality sampling in the road corridors. We recommend that the EIS include a detailed discussion of historical monitoring conducted on the Park's road corridors. Additionally, monitored data should be presented in the EIS for the various monitoring periods, such as monthly or seasonally, and include peak pollutant concentrations.

**Concern ID:**                            23742

**CONCERN STATEMENT:** Commenters requested that the plan/EIS analysis include a more extensive assessment of greenhouse gas emissions and climate change than past planning documents.

**Representative Quote(s):**    **Corr. ID:** 191                      **Organization:** *Not Specified*

**Comment ID:** 129476            **Organization Type:** Unaffiliated Individual

**Representative Quote:** In all the alternatives, the EIS needs to provide an estimate of the amount of fuel that would be consumed assuming the visitation provisions of the alternative are filled to capacity every day. Only in such a manner will you be able to demonstrate how extraordinarily gas-guzzling snowcoaches are, particularly as compared to the fuel that visitation on plowed roads/bus alternatives would consume. The fuel estimations also need to include that used by oversnow groomers, push plows, and rotary plows, so that the public understands that plowing roads would cost about the same in fuel and labor costs as do oversnow groomed roads.

**Corr. ID:** 191                      **Organization:** *Not Specified*

**Comment ID:** 129485            **Organization Type:** Unaffiliated Individual

**Representative Quote:** Past EISs have given only lip service to the effects of climate change on the park. This EIS needs to provide the latest scientific information on projected climate change effects on Yellowstone; a thorough literature review needs to be included. Also, the air quality modeling needs to include estimates of the carbon dioxide that would be produced under each alternative--both if visitation is held constant across the alternatives and if each alternative is maxed out in visitation. Such modeling should compare the CO<sub>2</sub> produced under each alternative to typical automobile CO<sub>2</sub> production and should multiply out the CO<sub>2</sub> produced under each alternative by the average number of automobiles used in America each weekday (100 million?), to demonstrate how carbon-intensive each mode of transportation in Yellowstone is (or is

not). Again, I suspect the environmentalists' darling child, snowcoaches, will be shown to be pretty carbon intensive.

**Corr. ID:** 1464                      **Organization:** *Not Specified*

**Comment ID:** 128930            **Organization Type:** Unaffiliated Individual

**Representative Quote:** Finally, the role of climate change adaptation must be included in winter use planning. Although the directional changes of rapid climate change are not yet obvious, impacts are already being felt. The Winter Use Plan should include policy mechanisms that allow for flexibility and adaptability of management decisions as monitoring data indicates ecological change and/or environmental damage to natural resources.

**Corr. ID:** 1494                      **Organization:** CNPSR et al

**Comment ID:** 128559            **Organization Type:** Unaffiliated Individual

**Representative Quote:** Moreover, we encourage NPS to conduct an assessment of overall greenhouse gas (GHG) emissions associated with the various winter-use alternatives. In September 2009, Secretary Salazar directed Interior agencies to reduce their own greenhouse gas emissions as part of Interior's overall climate strategy. CEQ has also issued a draft guidance memorandum that lays out direction for federal agencies to consider climate change impacts under NEPA. The February 18, 2010 memo from Nancy Sutley, CEQ chair, states that "for Federal actions that require an EA or EIS, the direct and indirect GHG emissions from the action should be considered in scoping and, to the extent that scoping indicates that GHG emissions warrant consideration by the decision maker, quantified and disclosed in the environmental document."

**Corr. ID:** 1494                      **Organization:** CNPSR et al

**Comment ID:** 128560            **Organization Type:** Unaffiliated Individual

**Representative Quote:** NPS has previously utilized a correlation between fuel consumption and carbon dioxide emissions as a rudimentary gauge of the global warming impacts of various winter-use alternatives. (2008 EA at 2-6.) NPS should apply a more rigorous assessment of the GHG footprint of winter-use alternatives that incorporates all elements of the winter-use program for Yellowstone, including visitor transportation, management transportation, road grooming/plowing, visitor facility energy consumption (propane and electricity at lodges, etc.), and so forth. As part of the Yellowstone Environmental Stewardship Initiative, Yellowstone completed a GHG emissions inventory of park operations and management in 2007 that identified an annual baseline GHG emissions level of 40,187 metric tons CO<sub>2</sub> equivalent. The majority of park GHG emissions are associated with facilities, where propane and electricity consumption contribute 78 percent of operational GHG emissions. The inventory apparently did not include visitor contributions to GHG emissions, particularly from private vehicles. However, the emissions inventory is new and relevant information that provides a useful starting point for comparing the GHG emissions of winter-use alternatives, and their contribution to overall park GHG reduction goals.

**Corr. ID:** 1494                      **Organization:** CNPSR et al

**Comment ID:** 128558            **Organization Type:** Unaffiliated Individual

**Representative Quote:** I. Climate Change

Finally, climate change science and related regulatory responses are rapidly evolving, providing another category of new information for evaluation in the EIS. NPS should consult with USGS and USFWS scientists, select an appropriate climate change model or models, and estimate a range of expected future environmental conditions for Yellowstone in winter. Climate change modeling will better inform decision-makers about the long-term sustainability of various winter-use alternatives.

**Concern ID:** 23745

**CONCERN STATEMENT:** Commenters question past data related to air quality analysis. Specific concerns included skewed data from misplaced air monitors and the modeling assumption of 100% use.

**Representative Quote(s):** **Corr. ID:** 191 **Organization:** Not Specified

**Comment ID:** 129478 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Past EISs have consistently modeled the air quality and noise effects of each alternative with the assumption that the alternative's use provisions were filled to capacity every day. While that is a fine way to demonstrate the worst-case situation under each alternative, it does not provide an indication of the air quality and sound impacts one person (a typical visitor) would create. The EIS should provide this information. It would also be good to multiply out the impacts to 100 or 1,000 visitors, to demonstrate what a typical day under the provisions of each alternative would generate in air pollution, noise pollution, and fuel consumption. For example, the NPS should model the effects of 1,000 visitors taking the same 70-mile tour of the park under the restrictions of each alternative.

**Corr. ID:** 1572 **Organization:** Citizens for Balanced Use

**Comment ID:** 129366 **Organization Type:** Civic Groups

**Representative Quote:** Another issue raised by environmental groups is air quality. My family and I have visited the Park on snowmobiles since 1996 and only over the last few years have we not returned. The reason for this is the requirement for visitors to have a guide and also the fact that many members of my family do not have the new technology snowmobiles that meet or exceed the BAT standards. I believe the BAT standards are a good thing and CBU has supported this requirement in the Park. This requirement has also been pushed by environmental groups. The problem is that after the Park adopted the emission standards, this was not enough and the environmentalists again filed suit to remove snowmobiles from the Park because of emissions. The environmental groups should have been required to support snowmobile use in the Park is the Park Service complied with their wishes by requiring only BAT approved machines but instead they again file suit to remove more and more snowmobiles from the Park. When will the judges realize this and require these groups to come forward with an amount of snowmobiles that they will support? The reason is clear as these groups what nothing less than all winter snowmobile use to be removed.

Air quality monitors have been installed to test air quality but the placement of these monitors is in questions. The monitor at the west entrance is picking up air samples from the town of West Yellowstone. This makes the data collected inaccurate as to air quality associated with snowmobile and snowcoach use in the Park because of outside influences from wood stoves, auto and truck exhaust, and other pollutants from the town. The scoping document should address locations of air quality monitors and should provide base line data to gauge air quality. CBU feels because of the skewed data from poor locations of air quality monitors that if such monitors were correctly placed to provide more accurate data then challenges to this data would be more defensible.

**Concern ID:** 23746

**CONCERN STATEMENT:** One commenter suggested the formation of an air quality working group to get larger stakeholder buy-in for the air quality analysis.

**Representative Quote(s):** **Corr. ID:** 1688 **Organization:** United States Environmental Protection

Agency

**Comment ID:** 130299      **Organization Type:** Conservation/Preservation

**Representative Quote:** Because the proposed action is within the Park, a Federal Class I area, the EIS should analyze and disclose the project's direct, indirect, and cumulative impacts to human health, for all the National Ambient Air Quality Standards (NAAQS), and AQRVs parameters.

The NPS has had informal discussions with EPA regarding participation in an air quality workgroup, and has formally requested EPA to serve as a Cooperating Agency and provide expertise in air quality monitoring and assessment, vehicle emissions, and other areas under our expertise. EPA supports the NPS's initiative to form an inter-agency air quality workgroup for the project to define the air quality analysis, evaluate the results of the analysis and assist with identifying appropriate mitigation measures, and would be pleased to participate in this effort. One of the primary purposes of an air quality workgroup would be to provide feedback to the NPS at the earliest stages of EIS development. EPA believes stakeholder involvement is important at all stages of the air quality analysis including the emission inventory, the modeling protocol, analysis of results, and identification of appropriate mitigation if necessary.

**CC1000 - Consultation and Coordination: General Comments**

**Concern ID:** 23751

**CONCERN STATEMENT:** Commenters requested extensive public involvement and agency coordination in the Winter Use Planning process, with a specific suggestion to work with the Society of Automotive Engineers Clean Snowmobile Challenge.

**Representative Quote(s):**      **Corr. ID:** 16      **Organization:** Winter Wildlands Alliance

**Comment ID:** 129507      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Inter agency planning and cooperation are needed, as is the courage to stand up against political pressure to continue with biologically unsound practices.

**Corr. ID:** 280      **Organization:** CUFF

**Comment ID:** 127934      **Organization Type:** Unaffiliated Individual

**Representative Quote:** The Winter Use Rule could involve effective and proactive collaboration with the public.

We agree the Winter Use Rule should involve the public; the more the better. The involvement should be an open decision-making process. Listen to the public, hear what they have to say without preconceived ideas, summarize what you hear, and then come back to the public at each step in the process and say "This is what we heard you say and this is what we are going to do, for these reasons." The worst thing you could do is front load the public input, retreat behind closed doors for 2 or 3 or 6 months and then come out and say "We are done. Here's the Winter Use Rule." To which the public will say "What's this. That's not what we said."

The key to public involvement, we believe, is 1) listen closely to what the public has to say, 2) actually do what they ask you to do, even if you do not agree, and 3) do all of that at each step in the EIS process, from the NOI to the final EIS and Record of Decision.

**Corr. ID:** 1573      **Organization:** Wyoming Outdoor Council

**Comment ID:** 129300      **Organization Type:** Civic Groups

**Representative Quote:** Oil and gas development is a major threat to visibility and air quality related values in the southern GYE. The Jonah Infill and Pinedale Anticline gas fields have been shown to contribute to impaired visibility in nearby Class I National Forest wilderness areas and models predict some decreased visibility in both Grand Teton and Yellowstone National Parks as a direct result of these projects alone and coupled with other sources. See Pinedale Anticline Final SEIS Air Quality Impact Tables 18.16 (showing direct impacts in GTNP and YNP)(Attachment 1) and 18.30 (showing cumulative impacts in GTNP and YNP) (Attachment 2) and Jonah Infill Final EIS, Appendix J at J-13 (showing direct impacts in GTNP and YNP) (Attachment 3) and J-27 (showing cumulative impacts in GTNP and YNP) (Attachment 4).

The Park Service is in a unique position as the manager of Class I areas. Although it may have only a limited ability to curtail non-park projects that threaten air quality on its lands, the Park Service nevertheless must remain actively involved in an inter-agency advisory capacity to ensure that such projects are done in a manner or at a pace that will protect visibility in the protected areas it manages. As an example, the Intermountain Regional Office of the National Park Service (NPS) did just this when it impaired visibility in the Grand Teton NP during its first phase. See letter from Cheryl Eckhardt, NEPA Specialist to Matt Anderson, BLM Project Lead, March 1, 2007 (Attachment 5). The letter described clean air as a "fundamental resource of the park", stating that "visitors place a high value on unimpaired views of the spectacular Teton Range." *Id.* The NPS called for increased monitoring because it "believed that the Pinedale Anticline Project could have significant impact on air quality at GTNP even prior to the addition of cumulative impacts." *Id.*

Perhaps even more importantly the Park Service must ensure that the activities it authorizes on the lands it manages to not have individual or cumulative impacts to air quality, especially in Class I areas. Over-snow vehicle travel in Yellowstone NP is an activity that contributes to the degradation of air quality. In this instance, the Park Service can and should take measures not only to mitigate, but also to avoid these adverse impacts.

**Corr. ID:** 1589                      **Organization:** Montana Fish, Wildlife, and Parks

**Comment ID:** 129844              **Organization Type:** State Government

**Representative Quote:** Commit to ongoing consultation with affected Montana agencies relating to wildlife studies and impacts, environmental quality studies and impacts and recreation and tourism related studies and impacts so as to maintain and build collaborative involvement in preserving Yellowstone.

**Corr. ID:** 1590                      **Organization:** Montana Department of Environmental Quality

**Comment ID:** 129851              **Organization Type:** State Government

**Representative Quote:** NPS might possibly work with the Society of Automotive Engineers' Clean Snowmobile Challenge (SAE CSC) and other partners to find a "retrofit" kit to reduce noise and to improve fuel economy for employee personal use snowmobiles, especially since some of them require a more demanding duty-cycle than the average BAT trail-touring machine.

**Concern ID:** 23754

**CONCERN STATEMENT:** Commenters suggested specific publications that should be consulted during the development that relate to coalition building and gaining public support.

**Representative Quote(s):** **Corr. ID:** 16                      **Organization:** Winter Wildlands Alliance

**Comment ID:** 129509              **Organization Type:** Unaffiliated Individual

**Representative Quote:** Should you desire more detail about how such a plan might work, or need support for convincing others, my book: *Ski Trails and Wildlife: Toward Snow Country Restoration*, may be useful.

**GA1000 - Impact Analysis: Impact Analyses**

**Concern ID:** 23767

**CONCERN STATEMENT:** Commenters requested that the impact analysis use best available science, as well as assess making access available and affordable to visitors.

**Representative Quote(s):** **Corr. ID:** 119 **Organization:** Coalition of National Park Service Retirees

**Comment ID:** 127442 **Organization Type:** Unaffiliated Individual

**Representative Quote:** The new plan should be built on the three foundations that Director Jarvis said the plan should be based on in his statement about the new planning process: 1. the best available sound science; 2. accurate fidelity to the law; and 3. the long term public interest.

**Corr. ID:** 677 **Organization:** *Not Specified*

**Comment ID:** 126836 **Organization Type:** Unaffiliated Individual

**Representative Quote:** In deciding what amount of winter use to allow, I urge the reliance on scientific data as opposed to political, economic, or tourist pressure. I believe the Yellowstone National Park is worth preserving with all its parts.

**Corr. ID:** 1477 **Organization:** *Not Specified*

**Comment ID:** 129075 **Organization Type:** Unaffiliated Individual

**Representative Quote:** In addition to the National Park Service's mandate to incorporate best sound science into its management decisions - visitor access that minimizes adverse impacts to air and water quality, the natural soundscape and wildlife - this analysis of winter use should also assess long-term priorities of making reliable access universally available and affordable to visitors.

**Corr. ID:** 1492 **Organization:** CNPSR et al

**Comment ID:** 128668 **Organization Type:** Unaffiliated Individual

**Representative Quote:** First, the science utilized in the agency's winter-use planning process--including the methods, data, and assumptions underlying all relevant studies--must be "sound." In particular, NPS should only make use of scientific analysis that accurately reflects the alternatives under consideration. For instance, any assessment of the relative impacts of snowcoach and snowmobile access must account for both the current performance of "best-available-technology" machines and the likely future performance of such vehicles, given recent technological trends. Studies premised on "apples-to-oranges" comparisons of the environmental performance of less-than-best-available-technology snowcoaches and best-available-technology snowmobiles cannot offer a sound basis for the National Park Service's analysis or decision.

Second, the winter use plan ultimately selected by the National Park Service must conform to the "sound science" gathered during this planning process. Under the prior administration, scientific studies were arbitrarily disregarded or amended when inconsistent with the desired outcome. If a sustainable plan is to be adopted, park planners must now be allowed to take a different course.

**Corr. ID:** 1543 **Organization:** Town of West Yellowstone

**Comment ID:** 129376      **Organization Type:** Town or City Government

**Representative Quote:** 2) The Town would like the Park Service to ensure - insofar that it is possible - that all of the alternatives that are considered are legally defensible and will be able to be implemented quickly and with a minimal number of legal challenges.

**Concern ID:** 23768

**CONCERN STATEMENT:** Commenters requested that the plan/EIS analysis look at context and intensity.

**Representative Quote(s):**      **Corr. ID:** 826      **Organization:** Association of Wisconsin Snowmobile Club

**Comment ID:** 127305      **Organization Type:** Unaffiliated Individual

**Representative Quote:** In reality, do 318 snowmobiles per day have even a fraction of the impact that summertime visitors in their diesel coaches have. A key consideration in any NEPA analysis is "context" and "intensity." In past analysis, the agency has focused on potential impacts of snowmobiling without the proper context. The key flaw in previous analysis is that it failed to consider impacts of wintertime activities in the context of year round use. I formally request that the agency consider impacts of snowmobiling in contrast to summer use.

**Corr. ID:** 1580      **Organization:** Blue Ribbon Coalition

**Comment ID:** 129858      **Organization Type:** Recreational Groups

**Representative Quote:** A key consideration in any NEPA analysis is "context" and "intensity." In past analysis, the agency has focused on potential impacts of snowmobiling without the proper context. The key flaw in previous analysis is that it failed to consider impacts of wintertime activities in the context of year round use. I formally request that the agency consider impacts of snowmobiling in contrast to summer use.

**Concern ID:** 23769

**CONCERN STATEMENT:** One commenter requested that the impact analysis develop a formula that considers the total loaded weight of a snowcoach compared to the surface area of the vehicle tracks in order to evaluate the impact from snowcoaches. Other commenters asked that the park look at the impact of snowmobiles vs. snowcoaches.

**Representative Quote(s):**      **Corr. ID:** 1038      **Organization:** Not Specified

**Comment ID:** 126301      **Organization Type:** Unaffiliated Individual

**Representative Quote:** There have been numerous studies that show snowmobiles cause less stress than snow coaches and less stress than people on foot.

**Corr. ID:** 1497      **Organization:** Not Specified

**Comment ID:** 128514      **Organization Type:** Unaffiliated Individual

**Representative Quote:** The Park Service correctly would like to promote advances in OSV technology that will reduce impacts and facilitate continuous improvement of technology over time. As technologies develop, they need to be analyzed as to their impacts on other forms of travel and the road surface they travel upon. Over snow travel by design is different than travel on a paved surface. The over snow surface is softer and more delicate. Heavy vehicles create substantial ruts and grooves in the snow surface making it dangerous for other OSVs traveling along the same roadways. A formula should be developed that looks at the total vehicle weight - loaded, compared to the surface area of the vehicle's tracks. This would give a footprint or the pressure per

surface area of each vehicle. From there, guidelines could be developed that would assure each OSV provides enough floatation so the roadway is not destroyed.

**Concern ID:** 23770

**CONCERN STATEMENT:** One commenter requested that the analysis of park resources consider the park as a whole, not just where OSV use occurs.

**Representative Quote(s):** **Corr. ID:** 1584 **Organization:** Not Specified

**Comment ID:** 129610 **Organization Type:** Unaffiliated Individual

**Representative Quote:** What park resources and values to you believe are most important and which of these should guide development of the winter use plan for Yellowstone?

1. The analysis of the resources and values should be measured on a park-wide basis. Travel corridors and public areas are not wilderness yet should be managed in a manner that addresses an appreciation for place. Consideration should be given to using a wider acceptable range of impact in these limited locations. After all, they are not the only areas where wildlife, sound, air quality, and wilderness exist.

**Concern ID:** 23773

**CONCERN STATEMENT:** Commenters asked that the impact analysis for this plan/EIS not be limited to those issues litigated or to information in previous planning documents. In addition, they requested that the baseline be no OSV use.

**Representative Quote(s):** **Corr. ID:** 1566 **Organization:** Animal Welfare Institute

**Comment ID:** 129275 **Organization Type:** Conservation/Preservation

**Representative Quote:** When evaluating all alternatives, the NPS must compare impacts to the baseline condition which must be defined as the conditions that would exist if YNP were not and never had been open to oversnow motorized recreational use (including road packing/grooming). An undisturbed YNP must be the baseline upon which all alternatives should be compared not a YNP where the baseline is defined as including oversnow motorized recreation and road packing/grooming. In past planning documents, by using the latter definition of the baseline, it has suggested that significantly restricting or terminating oversnow winter recreational use in YNP would result in adverse impacts to public use when, had it relied on the former definition of baseline conditions, such impacts could not have been determined to be adverse. The need for the baseline to reflect a no oversnow motorized recreational use condition is even more relevant in this case since, to date even though YNP has permitted oversnow motorized vehicles to access YNP since the 1960s, it still has never fully complied with NEPA. Since NEPA requires federal agencies to consider the impacts of their actions before permitting the action, legally oversnow motorized recreational use of YNP (including road packing/grooming) should not be permitted meaning that the baseline would reflect a no-oversnow motorized use condition.

**Corr. ID:** 1566 **Organization:** Animal Welfare Institute

**Comment ID:** 129266 **Organization Type:** Conservation/Preservation

**Representative Quote:** In the 2008 decision that invalidated the previous YNP winter use EIS, the court identified a number of deficiencies in the EIS including in regard to the NPS conservation mandate and its consideration of impacts to air quality, natural soundscapes, and wildlife. While this reveals the basis upon which Judge Sullivan rejected the 2007 EIS thereby triggering this new planning process, the NPS should not limit their analysis in the new winter use EIS to only those deficiencies identified by the court since the court's ruling did not exclude other potential deficiencies in the EIS. For



example, though AWI determined the 2007 EIS to be legally deficient for many of the same reasons raised by the plaintiffs in Greater Yellowstone Coalition/National Parks and Conservation Association v. Kempthorne/U.S. Department of the Interior, the EIS also failed to adequately address the environmental impacts of road packing/grooming. AWI could have pursued litigation at that time to raise that issue but elected to await the outcome of the GYC/NPCA case before proceeding with any independent legal action. Consequently, the fact that Judge Sullivan did not raise the road packing issue as a concern in his 2008 decision is not because the NPS sufficiently addressed the issue but was only because plaintiffs in those cases did not include any claims relevant to the road packing/grooming issue.

**Corr. ID:** 1566

**Organization:** Animal Welfare Institute

**Comment ID:** 129267

**Organization Type:** Conservation/Preservation

**Representative Quote:** In addition to a new, fresh analysis, AWI also encourages the NPS to also begin with a clean slate. While much of the information contained in previous environmental documents (EISs and EAs) remains relevant, instead of tiering to those documents, that information should be updated, disclosed, and analyzed in its entirety in the new EIS. While tiering is permitted to be used by agencies when preparing documents pursuant to the National Environmental Policy Act (NEPA), considering the history of this particular issue and the number of past EAs and EISs, a new, objective, and complete document would aid both the public and decision-makers in reviewing, evaluating, and ultimately making a decision on the long term management of winter use in YNP.

**Concern ID:**

23775

**CONCERN STATEMENT:** Commenters requested that the impact analysis of each alternative consider what uses are occurring and can or cannot be accommodated on adjacent federal lands. One commenter requested that this be reflected in the cumulative impacts analysis.

**Representative Quote(s):**

**Corr. ID:** 1464

**Organization:** Not Specified

**Comment ID:** 128925

**Organization Type:** Unaffiliated Individual

**Representative Quote:** Subject: Winter Use Planning Scoping Phase

I would like to submit the following comments with regard to the current Yellowstone National Park Winter Use Plan.

It is imperative that the ecological implications of natural resource policy be understood and addressed during this iteration of the planning process. As such, the cumulative impacts of each proposed action and alternative must be identified and addressed. This includes the need to recognize and account for the cumulative impacts of proposed activities on wildlife when those activities take place on lands adjacent to Yellowstone National Park. Wildlife and snowmobiles interact both inside and outside Park boundaries and as such those impacts must be addressed.

**Corr. ID:** 1530

**Organization:** Not Specified

**Comment ID:** 129183

**Organization Type:** Unaffiliated Individual

**Representative Quote:** Impacts to adjacent federal lands (FS) analyzed by alternatives, this would include the East Entrance near Pahasta. It appears that the Forest Service doesn't have enough capacity to handle any increased parking should alternatives be developed that would increase visitor use. Bathrooms are lacking, parking and turnaround etc. Consider how the park would work with the FS to co-develop facilities and what would be needed by alternative.

Summary - Assess impacts to adjacent federal land by alternative.

**Concern ID:** 23779

**CONCERN STATEMENT:** One commenter requested that the plan/EIS consider the low percentage of use that winter use represents in the impact analysis.

**Representative Quote(s):** **Corr. ID:** 1449 **Organization:** Not Specified

**Comment ID:** 129043 **Organization Type:** Unaffiliated Individual

**Representative Quote:** am an Endangered Species Act habitat professional well aware of the need for natural space, connectivity between limited habitats, and the inevitability of management within our modern landscape. Impact is an interesting term? Impact such as roads, infrastructure, construction & maintenance, 24/7-wheeled vehicle allowance, human foot, bicycle, and other travel presence, unnatural trail construction & maintenance, pet presence, and many more are allowed and even celebrated by the national park service. Maybe there needs to be a reminder that the winter vehicle use represents 1% of the annual visitation and a fraction there of the annual "Impact". While there have been some (admittedly few) abuses of the rules for winter use the fact remains that snowmobiles represent a very small impact to the park. Snowmobiles are limited to the existing roads which make-up a very small area within the park. The roads and off road area can be accessed by other winter visitors enabling sanctuary from noise concerns. There are many studies showing that human afoot or traveling by way of a non-motorized vehicle more detrimentally impacts wild life than that of a motorized vehicle.

**Concern ID:** 23782

**CONCERN STATEMENT:** One commenter requested that where the analysis identifies impacts, appropriate mitigation measures be identified.

**Representative Quote(s):** **Corr. ID:** 1688 **Organization:** United States Environmental Protection Agency

**Comment ID:** 130303 **Organization Type:** Conservation/Preservation

**Representative Quote:** Wherever potentially significant or undesirable impacts are noted, the NPS should identify and assess available mitigation measures to reduce those impacts. The NPS has consistently been progressive in seeking and implementing effective mitigation to reduce snowmobile impacts (i.e., speed limits, guiding requirements, grooming changes, group size limits, best available technology, hearing protection, etc). In virtually every case, when a potentially unacceptable impact was identified with snowmobiles, the NPS implemented mitigation at the earliest available opportunity. In recent analysis, the NPS has identified undesirable impacts from snowcoaches (e.g., road rutting and louder than desirable noise levels). We ask that the NPS work to reduce those impacts with available mitigation in this analysis. It may be possible, through the definition of snowcoach BAT, to reduce or avoid these impacts.

**Concern ID:** 23783

**CONCERN STATEMENT:** One commenter requested that the comments of people from the local area receive more weight those from other areas.

**Representative Quote(s):** **Corr. ID:** 1279 **Organization:** Cody Country Snowmobile Association

**Comment ID:** 128207 **Organization Type:** Unaffiliated Individual

**Representative Quote:** We really hope that you will take all of the comments that you receive into consideration in your decision making process. We also hope that you put more weight into the comments from people in this area vs. people that are not from this area.

**GA3000 - Impact Analysis: General Methodology For Establishing Impacts/Effects**

**Concern ID:** 23787

**CONCERN STATEMENT:** One commenter requested a range of areas that should be part of the impact analysis methodology for the plan/EIS such as how snowmobile impacts air, sound, and visitor use.

**Representative Quote(s):** **Corr. ID:** 1423 **Organization:** Rock the Earth  
**Comment ID:** 128881 **Organization Type:** Unaffiliated Individual

**Representative Quote:** VIII. Conclusion

The scoping process for the final Winter Use Plan for the Parks must include a thorough review of the impacts of snowmobiles on all aspects of Park management, including the following factors, which were discussed in more detail above:

- ? Park policies and Federal regulations that pertain to the use of snowmobiles;
- ? The impact of snowmobile use on the experiences of other visitors to the Parks;
- ? The negative impacts to air quality as a result of snowmobile use;
- ? The impact on the natural soundscapes from the presence of snowmobiles in the Parks;
- and
- ? The negative effects to Park wildlife caused by the use of snowmobiles in the Parks

A complete ban on snowmobile use, as originally provided for by the 2000 ROD, should be one of the options considered in light of the above factors. The expeditious removal of snowmobiles is mandated under all applicable legal authority; it is clearly based on all scientific information collected over a 20-year period; and it is overwhelming recommended by the majority of visitors and experts who have reviewed the data and public commentators at every step of this long and drawn-out process. On behalf the members of Rock the Earth, we strongly register our position that the NPS should not allow snowmobiles into the Parks.

**GA4000 - Impact Analysis: Impairment**

**Concern ID:** 23790

**CONCERN STATEMENT:** Commenters requested a plan that keeps the park unimpaired for future generations, with one commenter stating that they believe OSV use is an impairment.

**Representative Quote(s):** **Corr. ID:** 1300 **Organization:** Not Specified  
**Comment ID:** 128244 **Organization Type:** Unaffiliated Individual

**Representative Quote:** RE: Winter Use Scoping:

I am a permanent Montana resident and live 70 miles north of Yellowstone National Park (YNP). My husband and I visit Yellowstone in all seasons. To adhere to the mission of the National Park Service to maintain the national parks "unimpaired for future

generations" is essential.

**Corr. ID:** 1561

**Organization:** *Not Specified*

**Comment ID:** 129332

**Organization Type:** Unaffiliated Individual

**Representative Quote:** In summary, I support a winter use plan that protects and conserves the wildlife, scenery, natural history, and wilderness character of national parks leaving them unimpaired for future generations.

**Corr. ID:** 1566

**Organization:** Animal Welfare Institute

**Comment ID:** 129271

**Organization Type:** Conservation/Preservation

**Representative Quote:** Indeed, oversnow motorized recreational use is not permitted in the majority of national park units that typically receive sufficient snow to permit such use demonstrating that the NPS is not required to permit such use. While any such use, if it results in an impairment, is clearly prohibited by NPS legal standards even public uses that don't cause an impairment are not necessarily permissible in units of the national park system. In the case of oversnow motorized recreation (including road packing/grooming) in YNP, there is compelling evidence that such a use does constitute an impairment and must be either significantly limited (e.g., from the South Entrance to Old Faithful only) or terminated. Even assuming that such a use does not constitute an impairment there are, as AWI has documented in previous comments, sufficient additional reasons why this use should not be permitted in YNP or why it must be significantly reduced in numbers and area of geographic impact.

**Concern ID:** 23791

**CONCERN STATEMENT:** Commenters stated they did not feel snowmobile use was an impairment of park resources.

**Representative Quote(s):**

**Corr. ID:** 355

**Organization:** *Not Specified*

**Comment ID:** 126619

**Organization Type:** Unaffiliated Individual

**Representative Quote:** The snowmobile does not impair or irreparably harm the parks resources or values.

### **GA5000 - Impact Analysis: Unacceptable Impacts**

**Concern ID:** 23796

**CONCERN STATEMENT:** One commenter stated that the NPS use of the unacceptable impact standard is a misstatement of the law.

**Representative Quote(s):**

**Corr. ID:** 1523

**Organization:** Wyoming Legislature

**Comment ID:** 128274

**Organization Type:** Unaffiliated Individual

**Representative Quote:** What is clear is that avalanche hazards on Sylvan Pass can and are being effectively mitigated and managed.

I also support the comments of the Park County, Wyoming Board of County Commissioners submitted on this EIS.

Recreational uses can only be prohibited by park managers if such use causes impairment. Previously, the NPS use of the standard of "unacceptable impacts" is a misstatement of the law.

**Concern ID:** 23797

**CONCERN STATEMENT:** One commenter stated that they believe the available research shows that snowmobiles cause an unacceptable impact.

**Representative Quote(s):** **Corr. ID:** 1567 **Organization:** *Not Specified*

**Comment ID:** 129316 **Organization Type:** Unaffiliated Individual

**Representative Quote:** The research already done by NPS proves that snowmobiles cause unacceptable impacts on wildlife, on the quiet that many visitors expect to find in a national park, and on what should be clean, crisp air. It is high time the experiment with snowmobiles was brought to a close.

### **HS2000 - Health and Safety: Methodology and Assumptions**

**Concern ID:** 23798

**CONCERN STATEMENT:** One commenter stated that a risk vs. reward analysis was not appropriate for the decision to keep (or not keep) Sylvan Pass open.

**Representative Quote(s):** **Corr. ID:** 1523 **Organization:** Wyoming Legislature

**Comment ID:** 128290 **Organization Type:** Unaffiliated Individual

**Representative Quote:** RISK V. REWARD

A risk vs. return analysis is neither the proper nor fair analysis to be applied to determine whether winter use of motorized vehicles over sylvan pass should continue. The "return" that is being looked at has been so grossly distorted by NPS and other federal policies and communication failures that the quantification of the return has become problematic at best. Winter use numbers through the East Gate for 2006/2007 have absolutely no meaning or relevance. At a minimum, snowmobile use numbers through the East Gate in 2000 are the only relevant figures.

### **HS4000 - Health and Safety: Impact of Proposal and Alternatives**

**Concern ID:** 23799

**CONCERN STATEMENT:** Commenters suggested there would be beneficial impacts of plowing the roads to health and safety, with faster emergency response and lack of people driving on snow covered roads.

**Representative Quote(s):** **Corr. ID:** 1156 **Organization:** *Not Specified*

**Comment ID:** 128065 **Organization Type:** Unaffiliated Individual

**Representative Quote:** - Road plowing and safety - the national park service has lost too many of its own employees as well as the lives of visitors because of pressure to reopen snow-covered roads, either keeping them open throughout snowy winters, or opening quickly in the spring. Financial arguments of the impact on closed roads on local communities cannot compare to the cost of lives lost. Policy should put safety first.

Thank you for considering these issues.

**Corr. ID:** 1578 **Organization:** *Not Specified*

**Comment ID:** 129878 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Emergency Medical Services (EMS): Under the current Oversnow plan and any future Oversnow plan, EMS service operations are greatly complicated and very expensive. Response by Paramedics on snowmobiles is complicated at best. Adequate medical supplies are difficult to haul and are much easier with wheeled vehicles. Patient transport via ambulance many times is not possible with Oversnow vehicles because of road conditions or the patient's urgent need for treatment. Oversnow is very rough travel and is slow. Ambulances on wheels can travel at a much higher rate of speed while maintaining patient comfort and the ability of EMS personnel to continue treatment. Initial medical response times are much faster with wheeled vehicles.

**Concern ID:** 23800

**CONCERN STATEMENT:** One commenter noted that they believed plowed roads would create a safety risk from and increased interaction between wildlife and vehicles.

**Representative Quote(s):** **Corr. ID:** 1497 **Organization:** Not Specified

**Comment ID:** 128509 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Wildlife, especially the nomadic bison utilize the groomed roads when it benefits their travel. In the springtime as soon as the roads are plowed the pavement acts as a magnet for wandering bison. As soon as the roads are plowed, it is uncanny how many more bison move to and travel on the plowed road surface compared to the groomed road surface. Plowing the roads throughout the winter will only compound the issue of animal - vehicle interactions, making travel more dangerous for park visitors, more difficult for wheeled vehicles to pass the slow moving bison making for unsafe situations, and more stressful to the animals already in a critical time of year as they are surrounded by impatient, uninformed drivers. This is a formula for trouble creating an environment prime for increasing the risks of automobile accidents, personal and animal injury.

### **OI3000 - Other Issues: Comment Period**

**Concern ID:** 23801

**CONCERN STATEMENT:** One commenter requested that every citizen's comment receive equal weight in the plan/EIS.

**Representative Quote(s):** **Corr. ID:** 1330 **Organization:** ANPR

**Comment ID:** 129103 **Organization Type:** Unaffiliated Individual

**Representative Quote:** You might ask what I mean in reference to "the long-term public interest?" My explanation involves a statement and an example. I do not believe that the long-term public interest is served, either for current Americans or future generations of Americans, when greater weight is given to the opinions and comments of citizens who reside in close proximity to a park. Your planning process must give every citizen's comments equal weight for the final document to be perceived as equitable and not politically influenced.

### **ON1000 - Other NEPA Issues: General Comments**

**Concern ID:** 23802

**CONCERN STATEMENT:** One commenter stated that as part of the NEPA process, the NPS needs to explain why winter use is being limited, while summer use is not.

**Representative Quote(s):** **Corr. ID:** 164 **Organization:** Montana Snowmobile Association

**Comment ID:** 129487      **Organization Type:** Unaffiliated Individual

**Representative Quote:** NEPA requires Federal Agencies to establish the need for the subject action. In this case, the NPS must justify why they feel the need to limit the approximately 250,000 winter visitors rather than the nearly 4 million summer visitors. Failure to do so constitutes an arbitrary and capricious decision.

**PN3000 - Purpose And Need: Scope Of The Analysis**

**Concern ID:** 23803

**CONCERN STATEMENT:** Commenters suggested that the scope of the analysis should include a comparison/analysis of summer use vs. winter use.

**Representative Quote(s):**      **Corr. ID:** 3      **Organization:** Not Specified

**Comment ID:** 126967      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Is this about politics, or is it about the health and welfare of the Yellowstone ecosystem? If it is about the latter, and you plan to severely limit OSV use, then you must take a hard look at the impact of the automobile. I am not a scientist, nor a snowmobiler, but an educator, and former long-time motor coach driver/ tour guide in YNP. My guess is that automobiles are causing exponentially more damage than snowmobiles.

**Corr. ID:** 1449      **Organization:** Not Specified

**Comment ID:** 129051      **Organization Type:** Unaffiliated Individual

**Representative Quote:** I'd also like to see a use plan designated for all other seasons and park access for realistic science based impact / use review and management.

Thank you for your continued dedication to our National Parks, aside from politics

**Concern ID:** 23805

**CONCERN STATEMENT:** Commenters stated that the scope of the Winter Use Plan should be expanded to include a greater emphasis on non-motorized winter use (see also "Other Suggested Alternative Elements")

**Representative Quote(s):**      **Corr. ID:** 891      **Organization:** Not Specified

**Comment ID:** 127700      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Except for the photograph on the third page of this document there appears to be no mention of where cross country skiing and snowshoeing fit in the winter use plans. I propose you consider skis and snowshoes as a major mode of winter use in the national park. What is the level of visitor use of skis and snowshoes at the present? It is assumed such use is primarily limited to recreational use by Yellowstone employees and family members. Surely, this option would have the lightest adverse impact on the fragile natural resources of Yellowstone, and meet your stated objective: "Provide the public an opportunity to experience and be inspired by Yellowstone's unique winter resources and values while ensuring resource protection."

**Corr. ID:** 1429      **Organization:** Maryland Ornithological Society

**Comment ID:** 129068      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Wildlife Values  
Yellowstone is world-renowned for its wildlife. The new Winter Use Plan should give

greater emphasis to wildlife-watching. Notable wildlife in winter include wolves and elk, which visitors see in Lamar Valley in the northeast corner of the park, accessible by an all-year park road. A resident population of Trumpeter Swans is augmented by migrants from the Arctic, wintering along the Firehole River, which is kept open by water from geothermal springs. Visitors reach this area by snowcoach between Madison and Old Faithful. At several places on this route walkways are kept snow-free for pedestrian visitors to see the geothermal features and wildlife.

MOS has experience with wildlife-watching trips, as we run volunteer-led field trips, both locally and to more distant sites. In Yellowstone, wildlife-watching groups are led commercially by snowcoach concessioners. Nonprofit organizations such as ours can lead such trips only by contracting with those concessioners. (In summer, nonprofits are free to run their own trips without a concessioner contractor.)

We would like to see measures in the new Winter Use Plan to provide easier access by snowcoach for wildlife-watching. Options for consideration in the EIS could include: (1) snowcoach shuttle trips to wildlife-watching sites and trailheads for snowshoeing and cross-country skiing without advance reservations, (2) listing winter wildlife tour operators on the NPS Yellowstone web site, and (3) exploring ways to foster nonprofit wildlife groups' trips via snowcoach in winter.

**Corr. ID:** 1502

**Organization:** Friends of Pathways

**Comment ID:** 128467

**Organization Type:** Unaffiliated Individual

**Representative Quote:** Friends of Pathways believe one significant opportunity to enhance the Winter Use Plan is to better address non-motorized winter use visits to Yellowstone. Unfortunately, despite the many years of Winter Use discussions, the NPS has historically failed to adequately consider and address the needs of non-motorized winter visitors. This EIS must include comprehensive analysis and actions in the alternatives that will support Nordic skiing, walking, snowshoeing, and snow-bicycle use in Yellowstone.

The Winter Use Plan EIS needs much more specific recognition and discussion on non-motorized modes in the purpose and need, and in the alternatives. The EIS should also include recognition of the Park Service's responsibility to provide appropriate non-motorized services and facilities. The new Winter Use Plan should include recognition these are desirable ways to accomplish the goals of the winter use plan, and provide details in the alternatives to do so. The historic EIS language on this subject was simply not adequate.

**Corr. ID:** 1502

**Organization:** Friends of Pathways

**Comment ID:** 128468

**Organization Type:** Unaffiliated Individual

**Representative Quote:** The purpose and need in the Scoping reflects this problem - it describes the purpose of the plan is to "determine whether motorized winter use of the park is appropriate." That misses the entire world of the non-motorized activities! Friends of Pathways was deeply disappointed when the last EIS simply repeated this language: "Non-Motorized Access: Non-motorized winter use would continue to be managed in accordance with prior decisions and rules." That is clearly not adequate planning for the needs of non-motorized visitors. Much more robust analysis must be included, both in the Purpose and Need, Why the plan is needed, and specifically in the Alternatives to be considered in the EIS. Please do not miss this great opportunity again - study non-motorized as well as motorized uses and plan for the best solutions for park visitors that wish to enjoy a ski tour, snowshoe, winter walk, or snow-bicycle trip to Yellowstone.

There is good guidance in the NPS Management Policies that provide policy support: Section 9.2 that states "Depending on a park unit's size, location, resources, and level of



use, the Service will, where appropriate, emphasize and encourage alternative transportation systems, which may include a mix of buses, trains, ferries, trams, and--preferably--nonmotorized modes of access to and moving within parks. In general, the preferred modes of transportation will be those that contribute to maximum visitor enjoyment of, and minimum adverse impacts on, park resources and values." Thus non-motorized modes should be a significant focus of the Winter Use Plan, based on the recently approved 2006 NPS Policies that interpret the Organic Act.

Non-motorized demand is there where facilities are provided, and there is a strong latent demand for more and better grooming for skiing, walking and snow-biking. It is clear that visitors in increasing numbers are enjoying the Parks in lower impact ways, and the Park Service can encourage this with an improved Purpose and Need and range of Alternatives in the new Winter Use Plan.

**Concern ID:** 23806

**CONCERN STATEMENT:** One commenter requested that the scope of the plan include winter use in Grant Teton National Park.

**Representative Quote(s):** **Corr. ID:** 1465 **Organization:** Governor, State of Wyoming

**Comment ID:** 128882 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Grand Teton National Park

While I am aware that the current purpose of this EIS process is to develop a winter use plan for Yellowstone, the NPS should broaden the scope of this process to reconsider and fix the winter use plan for Grand Teton National Park (GTNP). The current plan in that park practically eliminates snowmobile use without justification. As noted in the comments of the Wyoming State Trails Division, the Continental Divide Snowmobile Trail is cut in half under the current plan, and restrictive limits and BAT requirements unjustly limit access to Jackson Lake for fishing. Unlike Yellowstone, much of the snowmobile traffic in GTNP occurs right along the highway, and the limits and restrictions arising from conditions in Yellowstone simply do not make sense in GTNP. The NPS has historically considered winter use in both parks concurrently, and it should do so now.

#### ***PN4000 - Purpose And Need: Park Legislation/Authority***

**Concern ID:** 23836

**CONCERN STATEMENT:** Commenters noted pieces of Yellowstone's legislation and authority they felt represented the need to provide for recreational uses in the park.

**Representative Quote(s):** **Corr. ID:** 316 **Organization:** Not Specified

**Comment ID:** 126431 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Nor can we find any hint of the amusement park dimension in the Yellowstone Park Act signed by President Ulysses Grant. The language included a statement that indicated that Yellowstone was "dedicated and set aside as a public park or pleasuring ground for the benefit and enjoyment of the people". History and simple logic tells us that these two provisions exist in the context of the "preservation and protection" mission. Put another way, the enjoyment of the people provisions were built around appreciating and experiencing the "scenic, scientific and historic", and not apart from it. The Yellowstone Park Act also required the Secretary of the Interior to draft regulations providing "for the preservation from injury or spoliation, of all timber, mineral deposits, natural curiosities, or wonders within said park."

**Corr. ID:** 826                      **Organization:** Association of Wisconsin Snowmobile Club

**Comment ID:** 127306            **Organization Type:** Unaffiliated Individual

**Representative Quote:** Please do not take this wonderful opportunity away from future generations. The park service was mandated by Congress to "promote" and "provide for the use and enjoyment" of park resources. This is to include all visitors, not only those who come at a time when they can drive their car or hike.

**Corr. ID:** 833                      **Organization:** *Not Specified*

**Comment ID:** 127382            **Organization Type:** Unaffiliated Individual

**Representative Quote:** As an avid conservationist and supporter of YNP and the national park system, I support and encourage the ongoing efforts to preserve and protect our lands. But that is the point it is OUR land. As those who were instrumental in creating our park system have said, national parks are for THE PEOPLE'S ENJOYMENT, USE, AND ACCESS. Franklin Roosevelt stated, "... the fundamental idea behind the parks...is that the COUNTRY BELONGS TO THE PEOPLE". Newton Drury, former National Park Director stated, "?they (the parks) make it possible for ALL AMERICANS--millions of them at first-hand--to enjoy unspoiled the great scenic places of the Nation". And Stephen Mather, also a form NPS Director believed that "the parks do not belong to one state or to one section.... (they) are national properties in which EVERY CITIZEN has a vested interest."

Even the current National Parks Service claims this absolute core value via a web page titled National Parks: ACCESSIBLE TO EVERYONE ([http://www.nps.gov/pub\\_aff/access/index.htm](http://www.nps.gov/pub_aff/access/index.htm)).

**Corr. ID:** 1289                      **Organization:** Ski Benders

**Comment ID:** 128224            **Organization Type:** Unaffiliated Individual

**Representative Quote:** Yellow Stone is a National Park and is by mandate to be open to all citizens of the USA for various purposes of recreation, therefore I believe that rather than limit or end winter use of this National Park by snowmobilers, I believe that you should expand use in winter.

**Concern ID:** 23837

**CONCERN STATEMENT:** Commenters suggested that Yellowstone's legislation and authority does not provide for snowmobile use.

**Representative Quote(s):** **Corr. ID:** 925                      **Organization:** none

**Comment ID:** 127403            **Organization Type:** Unaffiliated Individual

**Representative Quote:** Yellowstone was not established as a cash cow for local economies, nor was it established to provide recreational opportunities for every possible recreational invention that might ever be developed.

**Corr. ID:** 1393                      **Organization:** *Not Specified*

**Comment ID:** 127104            **Organization Type:** Unaffiliated Individual

**Representative Quote:** It's simple, really. The park mission is all you need. You don't need an EIS or a whole pile of alternatives and analysis (again).

You can allow visitation through snowcoaches and on nonmotorized trails, which provides enjoyment and the best protection for the park to leave it unimpaired for future generations. But now, we must deal with the paperwork (again).

**PN5000 - Purpose And Need: Regulatory Framework**

**Concern ID:** 23843

**CONCERN STATEMENT:** Commenters stated that the mandate of the park service to "promote" and "provide for the use and enjoyment" of the park resources needs to be balanced with leaving these resources unimpaired when making management decisions.

**Representative Quote(s):** **Corr. ID:** 784 **Organization:** *Not Specified*

**Comment ID:** 127149 **Organization Type:** Unaffiliated Individual

**Representative Quote:** When creating the National Park System, Congress mandated that the Park Service: (1) "promote" and "provide for the use and enjoyment" of park resources, and (2) and "leave unimpaired for the enjoyment of future generations." These are coequal, yet sometimes conflicting, mandates that require the NPS to balance both interests when making management decisions.

**Corr. ID:** 1028 **Organization:** *Not Specified*

**Comment ID:** 126258 **Organization Type:** Unaffiliated Individual

**Representative Quote:** When creating the National Park System, Congress mandated that the Park Service: (1) "promote" and "provide for the use and enjoyment" of park resources, and (2) and "leave [the park resources] unimpaired for the enjoyment of future generations." These are coequal, yet sometimes conflicting, mandates that require the NPS to balance both interests when making management decisions.

**Corr. ID:** 1492 **Organization:** CNPSR et al

**Comment ID:** 128660 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Without question, the National Park Service must also strive to "provid[e] for the enjoyment of park resources and values by the people of the United States." (Management Policies § 1.4.3.) While it has been argued that the conservation of our first national park interferes with the public's enjoyment of its wonders and curiosities, it is only by protecting Yellowstone's resources and values from alteration and diminishment that NPS can actually provide opportunities for the public to enjoy and be inspired by them. In order to "establish a management framework that allows the public to experience Yellowstone's unique winter resources and values" (Notice of Intent to Prepare an Environmental Impact Statement, 75 Fed. Reg. 4,842, 4,843 (Jan. 29, 2010)), therefore, the agency's environmental analysis must determine which of the available alternatives is best "calculated to protect park resources and genuinely seeks to minimize adverse impacts on park resources and values" (Greater Yellowstone Coalition, 577 F. Supp. 2d at 193 (quotations omitted)). If the impacts of public access on Yellowstone's winter resources are not minimized, the public's enjoyment of them will again be compromised.

**Concern ID:** 23844

**CONCERN STATEMENT:** Commenters stated that the regulatory framework in which the park was established provides for access to the park, including snowmobile use.

**Representative Quote(s):** **Corr. ID:** 1057 **Organization:** *Not Specified*

**Comment ID:** 127764 **Organization Type:** Unaffiliated Individual

**Representative Quote:** There are Two mandated Goals for our national parks and under

these goals it is clear that snowmobiling in the parks should be included. If not then the parks are no-longer parks but wilderness areas waiting to be reclaimed.

It seems that some groups and individual believe that that is what the parks should be Wilderness without the minor impacts of motorized vehicles. There is plenty of room in the interior of the parks for this type of use as well and historical use. There should be room for all

**Corr. ID:** 1465                      **Organization:** Governor, State of Wyoming

**Comment ID:** 128819            **Organization Type:** Unaffiliated Individual

**Representative Quote:** Per the Yellowstone Organic Act, Yellowstone National Park was "dedicated and set apart as a public park or pleasuring-ground for the benefit and enjoyment of the people[.]" However, over the years winter management policies in Yellowstone have significantly restricted public access to their public park. Specifically, the decision to restrict daily entrance numbers down to what is now a miniscule 318 per day has led to a situation where Yellowstone is now accessible mostly by the more affluent members of our society - it is becoming a playground for the well-to-do and not a park for the people.

**Corr. ID:** 1492                      **Organization:** CNPSR et al

**Comment ID:** 128662            **Organization Type:** Unaffiliated Individual

**Representative Quote:** The unlawful snowmobiling rule promulgated in 2007 failed to recognize both the predominance of the National Park Service's conservation mandate and the nature of the "enjoyment" provided for under the Organic Act.

**Corr. ID:** 1541                      **Organization:** *Not Specified*

**Comment ID:** 129140            **Organization Type:** Unaffiliated Individual

**Representative Quote:** With regard to the National Park Service mission statement, we must always be resolute about the fact that Parks were and are created for human interaction. As time passed, that human interaction has been continually reengineered with ever greater respect for the preservationist component of the Service's mission statement ("as will leave them unimpaired for the enjoyment of future generations."). Nonetheless, we must never forget that, as legal entities, parks exist as public domains for citizens to enjoy. The challenge of preservation is not and should never be met primarily by exclusionary policies or economic practices. Rather, the most powerful tool of protection is and has always been the modification of human behavior through education. The key to protection of not just Yellowstone's resources but, currently, those of the entire planet hinge on people understanding what is at stake and then embracing values that lead to long-term preservation as expressed through social norms and rules. However, we can only educate those who visit the Park.

In considering the National Parks Omnibus Management Act of 1998, we commit ourselves to basing our decisions on science. And though science can be flawed by human biases as well it continues to stand as the best possible form of thinking with which to base our policies insofar as it is our most accurate approximator of truth. We must have the courage, our personal careers notwithstanding, to explain and defend the parks with the best science we can muster.

**Concern ID:** 23845

**CONCERN STATEMENT:** Commenters stated that various NPS policies and regulations mandate that snowmobiles not be allowed in the park. Some of the acts cited include the Organic Act, as well as NPS management policies.

**Representative Quote(s):**    **Corr. ID:** 1423                      **Organization:** Rock the Earth

**Comment ID:** 128841      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Finally, National Park Service guidance documents and policy interpreting the laws, regulations and Executive Orders support the prohibition of snowmobiles in the Parks. NPS Management Policy 1.4.3 contains an NPS obligation to "conserve and provide for enjoyment of park resources and values." Contained within this management policy is the mandate that the NPS managers "must always seek ways to avoid, or to minimize to the greatest degree practicable, adverse impacts on park resources" and "when there is a conflict between conserving resources and providing for enjoyment of them, conservation is to be predominant." See NPS Management Policy 1.4.3; 2000 ROD, at 13; 2004 EA at 11-12; 2007 ROD, at 30.

The NPS Management Policies also prohibit the impairment of park resources and values, thus ensuring that the Parks will continue to exist in a condition that "will allow the American people to have present and future opportunities for enjoyment of them." See NPS Management Policy 1.4.4 (The Prohibition on Impairment of Park Resources and Values); 2004 EA at 12 and NPS Management Policy 1.4.3 (NPS Obligation to Conserve and Provide for Enjoyment of Park Resources and Values). 2007 ROD, at 26-27.

Other substantive NPS Management Policies that support the basis for this comment letter can be found in NPS Management Policies 4.7.1 (Air Quality), 4.9 (Soundscape Management), 8.2 (Visitor Use), 8.2.3 (Use of Motorized Equipment), 8.2.3.1 (Off-road Vehicle Use), and 8.2.3.2 (Snowmobile Use).

**Corr. ID:** 1423      **Organization:** Rock the Earth

**Comment ID:** 128827      **Organization Type:** Unaffiliated Individual

**Representative Quote:** II. NPS Mandates Require that Snowmobiles be Banned from the Parks.

The NPS is guided by the United States Constitution, public laws, treaties, proclamations, Executive Orders, regulations, directives of the Secretary of the Interior and Assistant Secretary for Fish and Wildlife and Parks, as well as NPS guidance documents. The fundamental purpose of the National Park System as set forth in the Organic Act, 16 U.S.C. 1, 2-4, and reaffirmed by the General Authorities Act, 16 U.S.C. 1a-1 through 1a-8, as amended ("Organic Act"), mandates the conservation of park resources and values. The Organic Act of 1916, as amended, states in Section 1:

The Service thus established shall promote and regulate the use of the Federal areas known as the National Parks by such means and measures as to conform to the fundamental purposes of the said Parks which purpose is to conserve the scenery and the natural and historic objects and the wildlife therein and to provide for the enjoyment of the same in such a manner and by such means as will leave them unimpaired for the enjoyment of future generations. (16 U.S.C. 1, 2-4.)

Likewise, the General Authorities Act, as amended by the Redwood Act (March 27, 1978, P.L. 95-250, 92 Stat. 163, 16 U.S.C. 1a-1) ("General Authorities Act"), affirms the basic tenets of the Organic Act and provides additional guidance on National Park System management:

The authorization of activities shall be construed, and the protection, management and administration of these areas shall be conducted in light of the high public value and integrity of the National Park system and shall not be exercised in derogation of the values and purposes for which these various areas have been established. (16 U.S.C. 1a-1 through 1a-8, as amended.)

**Corr. ID:** 1423      **Organization:** Rock the Earth

**Comment ID:** 128834      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Federal regulations similarly limit the use of snowmobiles on National Park lands. The primary federal regulation that addresses such snowmobile use is found at 36 CFR 2.18, which generally prohibits the use of snowmobiles on National Park lands, 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 CFR 2.18(c) (emphasis added). The restatement of these principles in the Redwood Act is intended to serve as the basis for any judicial resolution of competing private and public values. In the Redwood Act, Congress provided that when there is a conflict between conserving resources and values and providing for the enjoyment of them, conservation is to be the primary concern. 16 U.S.C. 1a-1; See also 2000 ROD, at 12; 2003 ROD at 18; 2004 EA at 12.

**Corr. ID:** 1433      **Organization:** Friends of Yosemite

**Comment ID:** 128954      **Organization Type:** Unaffiliated Individual

**Representative Quote:** A ban on snowmobiles in the Parks is supported by existing Federal law, NPS regulations, and Park policies, and has been consistently supported by environmental analyses over more than a decade.

**Corr. ID:** 1566      **Organization:** Animal Welfare Institute

**Comment ID:** 129270      **Organization Type:** Conservation/Preservation

**Representative Quote:** A separate fundamental issue that the NPS must revisit in the EIS is its own statutory and regulatory authorities and policies governing public use of YNP and of national parks in general. The NPS has claimed, including in its scoping brochure prepared to initiate this latest planning process, that it has an obligation to ensure that the public can access and enjoy YNP during the winter. While some claim that national parks were set up as "pleasuring grounds" for the public, the plain language and clear intent of the NPS Organic Act, implementing regulations, and NPS policies indicate that the NPS is not obligated to allow for any and all types of public use in any and all parks at any time of the year. The NPS can, therefore, significantly limit or entirely terminate oversnow motorized use of YNP (including road packing/grooming) without violating any of its guiding statutes, regulations, or policies.

### ***PN7050 - Purpose and Need: Comments on the Draft Purpose Statement***

**Concern ID:** 23846

**CONCERN STATEMENT:** Commenters stated the purpose statement should be re-worded to state "how" OSV use would occur rather than "whether" OSV use would occur.

**Representative Quote(s):** **Corr. ID:** 306      **Organization:** *Not Specified*

**Comment ID:** 126415      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Concerning the purpose - the word "whether" is not exactly right. There will be motorized use of the highway and for administrative use, The real issue is "how much" motorized use is allowed and under what restrictions or conditions.

**Corr. ID:** 1214      **Organization:** *Not Specified*

**Comment ID:** 129133      **Organization Type:** Unaffiliated Individual

**Representative Quote:** What would you add, delete, or otherwise change in the draft purpose, need, and objectives statements?"

While the Park Service by past rulemaking may have boxed winter access into this being the starting point - it should not be from this point forward. Meaningful winter access to

Yellowstone should be a given, and with certainty there needs to be some mode of motorized transportation if this access is to be real access versus superficial access only to the fringes. Therefore it seems that the Purpose statement/question should be reframed to ask: what modes of motorized transportation are appropriate, to where in the park, when (season length), and to what extent (numbers). The question of IF should become HOW. If nothing else, this planning process should be used as an opportunity to reframe the discussion going forward.

In line with my comments above regarding the draft Purpose statement, it seems like portions of the draft Action Needed statement portray somewhat of a self-limiting attitude, which could also be viewed as a pre-decisional bias. In particular the second bullet of this section is heavily qualified by the statement "?but access to most of the park in the winter is limited by distance and the harsh winter environment, which present challenges to safety and park operations:" If the NPS is going to truly take a fresh, new hard-look at the issues, then perhaps it should step back a bit from such pre-qualifiers to that new look.

**Corr. ID:** 1559                      **Organization:** Wyoming State Snowmobile Association

**Comment ID:** 129338            **Organization Type:** Recreational Groups

**Representative Quote:** The scoping materials ask, "What would you add, delete, or otherwise change in the draft purpose, need, and objectives statements?"

In respect to the draft Purpose statement: It seems as if the Purpose statement is a bit off-base. It starts with "the purpose of the Winter Use Plan/EIS is to establish a management framework that allows the public to experience Yellowstone's unique winter resources and values." That makes sense, particularly that the management framework 'allows the public to experience' the park.

However, the next part of the Purpose statement does not make sense: "this plan will determine whether motorized use of the park? is appropriate?" It seems illogical to ask it any motorized use is appropriate since - without any type/mode of motorize access - there is essentially no substantive public use/public winter experience available other than on the outside fringes near Park entrances. Therefore the question currently being posed is more along the lines of "will any reasonable/meaningful public use/access be allowed or not."

**Corr. ID:** 1683                      **Organization:** Blue River Coalition

**Comment ID:** 130146            **Organization Type:** Unaffiliated Individual

**Representative Quote:** Snowmobiling in the Park is highly valued by those participating. Allowing snowmobiling to occur is consistent with the agency's management plan, the NPS national planning guidelines and the agency's strategic plans. Snowmobiling in Yellowstone is also consistent with recent agency direction to encourage increased visitation to National Parks. Snowmobiling is consistent Congressional direction in the establishment of both the National Park System and Yellowstone National Park itself. All of this should be reflected in the purpose and need statement itself.

**Concern ID:** 23847

**CONCERN STATEMENT:** Commenters suggested re-wording the purpose statement to include preservation of specific park resources.

**Representative Quote(s):** **Corr. ID:** 1393                      **Organization:** Not Specified

**Comment ID:** 127105            **Organization Type:** Unaffiliated Individual

**Representative Quote:** To be more in alignment with the Park Service mission, I

recommend changing the last half of the first sentence of statement of purpose, as follows:

The purpose of the Winter Use Plan/EIS is to establish a management framework that allows the public to experience Yellowstone's unique winter resources while preserving air quality, the soundscape, and wildlife habitat and values. This plan will determine whether motorized winter use of the park (including wheeled motor vehicles, snowmobiles, and snowcoaches) is appropriate, and if so, the types, extent, and location of this use.

**Concern ID:** 23848

**CONCERN STATEMENT:** Commenters stated that the purpose statement should be within the legal bounds of the park.

**Representative Quote(s):** **Corr. ID:** 1492 **Organization:** CNPSR et al

**Comment ID:** 128665 **Organization Type:** Unaffiliated Individual

**Representative Quote:** As suggested by the agency's request for comments, determining the "purpose, need, and objectives" of the National Park Service's environmental impact statement and winter use plan is perhaps the most fundamental decision to be made at this stage of the planning process. It is essential that the agency's statement of purpose and need--as well as the agency's statement of "desired conditions," addressed below--reflects applicable law, therefore launching the project in a direction that ultimately will be sustainable against possible legal challenge.

**Corr. ID:** 1517 **Organization:** *Not Specified*

**Comment ID:** 128313 **Organization Type:** Unaffiliated Individual

**Representative Quote:** My fundamental comment is that choosing a sustainable long-term winter use plan really ought to be the central consideration in each of the specific areas that you asked the public to comment on:

The purpose of the plan ought to be to provide reliable access and enjoyment of the park in whatever form you can be absolutely sure complies with laws that obviously require a high level of protection of Yellowstone. I am in the business of providing access and enjoyment to visitors. However, it will hurt visitors and in turn hurt my visitor-dependent business if a court determines that access authorized in this next winter use plan is not legal. If that happens, visitors and businesses such as mine will again be unsure of the future, unable to make plans. We've had too much uncertainty of this kind over the last ten years. I know that this has been difficult for the Park Service, too, so my intent here is not to be critical -- just clear about the stakes involved.

It is my feeling that is we could reliably and legally provide access with more snowmobiles, that would be welcome. But most in my community of West Yellowstone feel it is critically important to end up with a solid, sustainable, and workable plan that we can count on, promote, and build from -- not a wished-for plan that will again fail in court. Supporting an arbitrary number or alternative may seem attractive, but as a tour operator and employer eager for a sustainable decision, I want something I can count on. I ask you to ensure an analysis and decision that will give us a winter use plan that will work well and be sustained.



**Concern ID:** 23849

**CONCERN STATEMENT:** One commenter suggested that the purpose statement broaden the use of the word "public" and maybe add a component dealing with "long-range."

**Representative Quote(s):** **Corr. ID:** 1584 **Organization:** *Not Specified*

**Comment ID:** 129609 **Organization Type:** Unaffiliated Individual

**Representative Quote:** What would you add, delete, or otherwise change in the draft purpose, need, and objective statements provided on the previous page?

1. I believe the purpose needs to have a more encompassing description of the word "pubic" to emphasize a desire to have the experience a legitimate possibility for the broadest public.
2. Should some reference be made to purpose "long-range?"
3. It seems to me that a statement of the Park's need for visitors in every season should be included. After all, the personal, emotional connection (that I happen to believe occurs to a greater degree in a winter experience) will be very important while we as a nation want to get youth off the couch and active outside; and, to insuring commitment to the park for generations to come.

**Concern ID:** 23850

**CONCERN STATEMENT:** One commenter suggested the purpose statement answer the question, "What do you (the public) want Yellowstone to look like and be like in 50 years?"

**Representative Quote(s):** **Corr. ID:** 280 **Organization:** CUFF

**Comment ID:** 127938 **Organization Type:** Unaffiliated Individual

**Representative Quote:** We would change the Purpose of the document by asking the question "What do you (the public) want YNP to look like and be like in 50 years?" Maybe someone will say "I want the park to look like it does now, and still have all of the wildlife we have now, while still being able to snowmobile in the park." If that turns out to be the Desired Future Condition for the park than you can establish some goals (working with the public of course) to meet the DFC and then establish some objectives (again with the public) to meet the goals and DFC. But we think the first thing you have to do is establish what people want the park to look like in the future. If you don't know where you are going, there is no way to get there.

In other words, the Purpose of the Winter Use Rule should be to determine what the majority of the people want winter use in the park to look like and be like in 50 years. Once that is established you can develop direction to get us there.

### ***PN7075 - Purpose and Need: Comments on the Draft Need Statement***

**Concern ID:** 23851

**CONCERN STATEMENT:** Commenters stated that the need statement should be revised to remove any limiting statements.

**Representative Quote(s):** **Corr. ID:** 1516 **Organization:** Oregon State Snowmobile Association

**Comment ID:** 128329 **Organization Type:** Unaffiliated Individual

**Representative Quote:** In respect to the draft 'Action Needed' statement: In line with our comments above regarding the draft Purpose statement, it seems like portions of the draft Action Needed statement portray somewhat of a self-limiting attitude, which could also be viewed as a pre-decisional bias. In particular the second bullet of this section is

heavily qualified by the statement "but access to most of the park in the winter is limited by distance and the harsh winter environment, which present challenges to safety and park operations." If the NPS is going to truly take a fresh, new hard-look at the issues, then perhaps it should step back a bit from such pre-qualifiers to that new look.

**PN8000 - Purpose And Need: Objectives In Taking Action**

**Concern ID:** 23852

**CONCERN STATEMENT:** Health and Safety: Commenters questioned the use of the word "accident" in this objective statement, feeling that these cannot be "managed." Other commenters felt this objective should include the health of the communities around the park.

**Representative Quote(s):** **Corr. ID:** 1213 **Organization:** *Not Specified*

**Comment ID:** 129021 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Health and Safety: I'm unclear as to what intended by the word 'accidents' in the Objective statement? Since 'accident' is defined by Webster as "an event occurring by chance or from unknown causes" or "an unfortunate event resulting from carelessness, unawareness, ignorance, or unavoidable causes," it seems it would be difficult to "manage access" to any degree which would/could affect events which largely occur by chance or are unavoidable. Perhaps it would be more appropriate to target crashes, incidents, or some other term that would be more achievable than trying to 'manage' accidents.

**Corr. ID:** 1584 **Organization:** *Not Specified*

**Comment ID:** 129611 **Organization Type:** Unaffiliated Individual

**Representative Quote:** 2. Within the Health and Safety item include the health of communities that surround the Park (gateway communities) who are the Park's partners in so many ways. Consider weighting the social and economic effects on them at a higher level in the alternatives that come forth. Gateway communities tend to be isolated and do not enjoy the same levels of varied opportunity as their counties. A decision can and will impact the fabric of the community: the schools, public services, churches, the make-up of the population and the economic stability. A community's fabric is no different than a natural environment where all elements are interconnected and inter reliant.

**Concern ID:** 23853

**CONCERN STATEMENT:** Coordination and Cooperation: Commenters suggesting adding a statement to this objective that would provide for a transition period once any plan is implemented. Another commenter asked for clarification on who "park" partners included and their role in this planning process.

**Representative Quote(s):** **Corr. ID:** 891 **Organization:** *Not Specified*

**Comment ID:** 127694 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Coordination and Cooperation, I am puzzled by the term 'park partners.' Is it intended the Winter Use Plan' is to be a joint plan of the park and snowmobile operators, or will the Service be solely responsible for the plan's content? A listing of who are considered park partners in the development of this plan would be helpful.

**Corr. ID:** 1213 **Organization:** *Not Specified*

**Comment ID:** 129022 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Coordination and Cooperation: given the late final decision date

for this process in relation to the normal December 'winter season opening date' - an Objective statement should be added up-front to help relieve anxiety that clearly states: if any changes are made by the final decision which decrease the levels or types of access currently allowed by the Temporary Rule, there will be a minimum transition period of one year (or longer if appropriate) to allow businesses and communities time to respond. This Objective should be a constant for all Alternatives regardless of the decision (short of emergency health and safety issues).

**Concern ID:** 23854

**CONCERN STATEMENT:** Park Management and Operations: Commenters asked this statement to be modified to include "sustainability of road grooming."

**Representative Quote(s):** **Corr. ID:** 1516 **Organization:** Oregon State Snowmobile Association

**Comment ID:** 128339 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Park Management/Operations: a bullet statement needs to be added regarding providing 'sustainability of road grooming.' Related to this, a limit on the weight of snowcoaches needs to be added to any and all Alternatives which propose to allow snowcoach access - due to the severe rutting and damage they cause to the groomed road surface. This should include a phase-out of all existing large coaches (anything larger than a 15-passenger van) as soon as their existing contract expires. These large vehicles unduly increase maintenance and road grooming needs/costs, as well as create safety issues with the deep ruts they develop in the snow roads. This is such a severe maintenance and safety issue that any existing large coaches should not be 'grandfathered in' for any longer time period since this constitutes a serious health and safety issue.

In respect to the second bullet (Promote advances of OSV technology?), the planning process needs to recognize that, in respect to snowmobile BAT, special 'advances in technology' may likely have met a wall given too few numbers of snowmobiles associated with Yellowstone use. Adaptive management needs to drive changes versus setting unrealistic/unachievable benchmarks in a new Winter Use plan. EPA snowmobile emissions regulations will continue to change snowmobiles - but that could be the extent of 'advances in technology' over the near-term. Past planning processes envisioned an 'improved-BAT' which did not happen and remains unlikely to happen. Therefore the value/practicality/wisdom of setting date-certain thresholds when BAT certification for existing BAT snowmobiles expires after six years needs to be revisited. Automobiles, trucks and buses are not automatically banned from park roads when they become six years old - so we would submit that BAT snowmobiles should be treated equally.

**Corr. ID:** 1559 **Organization:** Wyoming State Snowmobile Association

**Comment ID:** 129343 **Organization Type:** Recreational Groups

**Representative Quote:** Park Management/Operations: a bullet statement needs to be added regarding providing "sustainability of road grooming." Related to this, a limit on the weight of snowcoaches needs to be added to any and all Alternatives which propose to allow snowcoach access - due to the severe rutting and damage they cause to the groomed road surface. This should include a phase-out of all existing large coaches (anything larger than a 15 passenger van) as soon as their existing contract expires. These large vehicles unduly increase maintenance and road grooming needs/costs, as well as create safety issues with the deep ruts they develop in the snow roads. This is such a severe maintenance and safety issue that any existing large coaches should not be "grandfathered in" for any longer time period since this constitutes a serious health and safety issue.

In respect to the second bullet (promote advances of OSV technology?), the planning

process needs to recognize that, in respect to snowmobile BAT, special 'advance in technology' may likely have met a wall given too few numbers of snowmobiles associated with Yellowstone use. Adaptive management needs to drive changes versus setting unrealistic/unachievable benchmarks in a new Winter Use plan. EPA snowmobile emissions regulations will continue to change snowmobiles - but that could be the extent of 'advances in technology' over the near-term. Past planning processes envisioned an "improved-BAT" which did not happen and remains unlikely to happen. Therefore the value/practicality/wisdom of setting date certain thresholds when BAT certification for existing BAT snowmobiles expires after six years needs to be revisited. Automobiles, trucks and buses are not automatically banned from park roads when they become six years old - so we would submit that BAT snowmobiles should be treated equally.

**Concern ID:** 23855

**CONCERN STATEMENT:** Commenters stated that the objective to "Promote advances of OSV technology" may not be achievable due to the level of OSV use in the park and asked that BAT requirements be revisited.

**Representative Quote(s):** **Corr. ID:** 1591 **Organization:** California - Nevada Snowmobile Association

**Comment ID:** 129902 **Organization Type:** Recreational Groups

**Representative Quote:** In respect to the second bullet (Promote advances of OSV technology.. .), the planning process needs to recognize that, in respect to snowmobile BAT, special 'advances in technology' may likely have met a wall given too few numbers of snowmobiles associated with Yellowstone use. Adaptive management needs to drive changes versus setting unrealistic/unachievable benchmarks in a new Winter Use plan. EPA snowmobile emissions regulations will continue to change snowmobiles - but that could be the extent of 'advances in technology' over the near-term. Past planning processes envisioned an 'improved- BAT' which did not happen and remains unlikely to happen. Therefore the value/practicality/wisdom of setting date-certain thresholds when BAT certification for existing BAT snowmobiles expires after six years needs to be revisited. Automobiles, trucks and buses are not automatically banned from park roads when they become six years old - so we would submit that BAT snowmobiles should be treated equally.

**Concern ID:** 23856

**CONCERN STATEMENT:** Commenters felt that the objective to "Promote advances of OSV technology" was too narrow. They felt it was pre-decisional, indicating that OSV use would occur, and excluding wheeled vehicles.

**Representative Quote(s):** **Corr. ID:** 1482 **Organization:** Not Specified

**Comment ID:** 128743 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Comment on Winter Use Forthcoming EIS

What is special to you about winter use in Yellowstone? What would you add, delete, or otherwise change in the draft purpose, need, and objective statements provided on the previous page?

I disagree with the Park Management/Operations bullet that states the EIS will "promote advances of oversnow vehicle technology that will reduce impacts and facilitate continuous improvement of technology over time". Since the EIS is evaluating wheeled vehicle use of the Park, the emphasis on oversnow vehicle presupposes an outcome and is excessively narrow. I would suggest rewording the statement to reflect the EIS will "promote advances of transportation technology that will reduce impacts and facilitate

continuous improvement of technology over time". That broader statement would be inclusive of the wheeled vehicle option.

**Corr. ID:** 1503                      **Organization:** *Not Specified*

**Comment ID:** 128448            **Organization Type:** Unaffiliated Individual

**Representative Quote:** I will try to comment here on the questions asked of us regarding Winter Use in Yellowstone:

YOU ASKED: What is special to you about winter use in Yellowstone? What would you add, delete, or otherwise change in the draft purpose, need, and objective statements provided on the previous page?

Yellowstone is the most special place on earth to me. Right now I do not go in all winter because of the expense and frustration with the schedules of commercial trips. I disagree with the bullet point in Park Management/Operations that states: "Promote advances of Oversnow vehicle technology that will reduce impacts and facilitate continuous improvement of technology over time." I think it should be changed to reflect wheeled vehicle technologies as well. This statement sounds as though OSV has already become the chosen alternative. Winter use could be very special to me if I could access the Old Faithful Area all winter long in my own vehicle. Warm, safe, and not having to leave the Old Faithful are after 90 minutes time.

The peace of Yellowstone is very special in winter, I only wish more people could experience it with nothing more than their National Park Pass or gate entrance fee. A park for all people, public access, would be very special.

**Corr. ID:** 1578                      **Organization:** *Not Specified*

**Comment ID:** 129874            **Organization Type:** Unaffiliated Individual

**Representative Quote:** Douglas Edgerton  
P.O. Box 29  
West Yellowstone, MT 59758  
406-646-7603

Comment on Winter Use

What is special to you about winter use in Yellowstone? What would you add, delete, or otherwise change in the draft purpose, need, and objective statements provided on the previous page?

Yellowstone is a special place regardless of the season. I disagree with the bullet point in Park Management/Operations that states "Promote advances of Oversnow vehicle technology that will reduce impacts and facilitate continuous improvement of technology over time." This statement predisposes an outcome in favor of OSV travel within the park.

**Concern ID:** 23857

**CONCERN STATEMENT:** Commenters requested that the objectives reflect the socioeconomic aspects of OSV management.

**Representative Quote(s):** **Corr. ID:** 1080                      **Organization:** *Not Specified*

**Comment ID:** 127796            **Organization Type:** Unaffiliated Individual

**Representative Quote:** The Purpose and Need and the Planning Objectives of this EIS

should reflect the socio-economic importance of snowmobiling in the Park. Snowmobiling has a long, rich history. Snowmobiling in the Park is highly valued by those participating. My parents took their first trip to Yellowstone as newlyweds in the winter of 1968 and have been making it an annual family outing for the last 42 years.

**Corr. ID:** 1418                      **Organization:** *Not Specified*

**Comment ID:** 128779              **Organization Type:** Unaffiliated Individual

**Representative Quote:** The Purpose and Need and the Planning Objectives of this EIS should reflect the socio-economic importance of snowmobiling in the Park. Snowmobiling has a long, rich history. Snowmobiling in the Park is highly valued by those participating. Allowing snowmobiling to occur is consistent with the agency's management plan, the NPS national planning guidelines and the agency's strategic plans. Snowmobiling in Yellowstone is also consistent with recent agency direction to encourage increased visitation to National Parks. Snowmobiling is consistent Congressional direction in the establishment of both the National Park System and Yellowstone National Park itself. All of this should be reflected in the purpose and need statement itself.

**Corr. ID:** 1580                      **Organization:** Blue Ribbon Coalition

**Comment ID:** 129855              **Organization Type:** Recreational Groups

**Representative Quote:** The Purpose and Need and the Planning Objectives of this EIS should reflect the socio-economic importance of snowmobiling in the Park. Snowmobiling has a long, rich history. Snowmobiling in the Park is highly valued by those participating. Allowing snowmobiling to occur is consistent with the agency's management plan, its national planning guidelines and its strategic plans. It is also consistent with recent agency direction to encourage increased visitation to National Parks. Snowmobiling is consistent Congressional direction in the establishment of both the National Park System and Yellowstone National Park itself. All of this should be reflected in the purpose and need statement itself.

**Concern ID:** 23858

**CONCERN STATEMENT:** Visitor Use: Commenters suggested adding providing "affordable access to the public" to this objective.

Commenters also raised concern about the component to "provide opportunities that are universally accessible" stating that this could be interpreted too broadly.

**Representative Quote(s):** **Corr. ID:** 1034                      **Organization:** Slednecks

**Comment ID:** 126269              **Organization Type:** Unaffiliated Individual

**Representative Quote:** The scoping information referenced several Plan Objectives, including those related to Visitor Use. One Plan Objective is: "Provide opportunities that are universally accessible." I support this objective because many snowmobilers use snowmobiles for access and recreation because they are physically unable to snowshoe or ski. But I am concerned that the Objective may be interpreted as meaning ALL opportunities should be universally accessible. Such an approach would be like requiring ALL hiking trails in the Park be universally accessible. Also, your analysis should consider that snowmobiles are chosen as a preferred recreation modality by many of the elderly and the handicapped.

**Corr. ID:** 1516                      **Organization:** Oregon State Snowmobile Association

**Comment ID:** 128336              **Organization Type:** Unaffiliated Individual

**Representative Quote:** In respect to the draft Objectives:  
Visitor Use: a bullet statement should be added regarding providing 'affordable access to

the public.' The cost of winter access has risen to the point it has become an experience only for the elite - local citizens and lower income public can no longer afford to visit the Park in the winter season. That is wrong and unacceptable for the long-term. A key to accomplishing this objective mostly likely will require a degree of individual public access versus access solely through commercial vendors.

A bullet statement should also be added regarding 'increasing the total number of winter visitors.' Changes since 2004 have stifled total visitation and dramatically decreased the number of winter visitors to the point it has adversely affected: economies of local communities, winter park revenues that should help off-set winter operating costs, and overall public access.

**Corr. ID:** 1591                      **Organization:** California - Nevada Snowmobile Association

**Comment ID:** 129896              **Organization Type:** Recreational Groups

**Representative Quote:** In respect to the draft Objectives:  
Visitor Use: a bullet statement should be added regarding providing 'affordable access to the public.' The cost of winter access has risen to the point it has become an experience only for the elite - local citizens and lower income public can no longer afford to visit the Park in the winter season. That is wrong and unacceptable for the long-term. A key to accomplishing this objective mostly likely will require a degree of individual public access versus access solely through commercial vendors.

A bullet statement should also be added regarding 'increasing the total number of winter visitors.' Changes since 2004 have stifled total visitation and dramatically decreased the number of winter visitors to the point it has adversely affected: economies of local communities, winter park revenues that should help off-set winter operating costs, and overall public access.

**Corr. ID:** 1683                      **Organization:** Blue River Coalition

**Comment ID:** 130150              **Organization Type:** Unaffiliated Individual

**Representative Quote:** The scoping information referenced several Plan Objectives, including those related to Visitor Use. One Plan Objective is: "Provide opportunities that are universally accessible." I support this objective because any snowmobilers use snowmobiles for access and recreation because they are physically unable to snowshoe or ski. But I am concerned that the Objective may be interpreted as meaning ALL opportunities should be universally accessible.

**Concern ID:** 23859

**CONCERN STATEMENT:** Resources/Air Quality: Commenters stated that this objective should be clarified as it is un clear to see how air quality and aquatic systems relate.

**Representative Quote(s):** **Corr. ID:** 1483                      **Organization:** American Council of Snowmobile Associations

**Comment ID:** 128684              **Organization Type:** Unaffiliated Individual

**Representative Quote:** In respect to the draft Objectives:  
Resources/Air Quality: It is puzzling to see "air pollution including visibility and aquatic systems" mixed together. It is difficult to see how "aquatic systems" relate to "air quality."

Resources/Wilderness: It is our feeling and understanding that "Wilderness" is a backcountry value and should only be expected in the backcountry - not in developed areas or along road corridors.

Coordination and Cooperation: Given the late final decision date for this process in relation to the normal December 'winter season opening date' - a statement should be added to help relieve anxiety that clearly states: if any changes are made by the final decision which decrease the levels or types of access currently allowed by the Temporary Rule, there will be a minimum transition period of one year (or longer if appropriate) to allow businesses and communities time to respond.

**Concern ID:** 23860

**CONCERN STATEMENT:** Resources/Air Quality: Commenters asked that this statement be revised to seek the best air quality and minimize impacts to the greatest extent, rather than just meeting what is required under regulations.

**Representative Quote(s):** **Corr. ID:** 1494 **Organization:** CNPSR et al  
**Comment ID:** 128547 **Organization Type:** Unaffiliated Individual

**Representative Quote:** E. Air Quality

The protection of Yellowstone's air is also essential to the preservation of the park's unique winter experience. Accordingly, we ask that NPS amend its air quality resource objective in a manner emphasizing that park planners "will seek to perpetuate the best possible air quality in parks"--not merely to assure compliance with National Ambient Air Quality Standards or other less demanding requirements. (Management Policies § 4.7.1; Greater Yellowstone Coalition, 577 F. Supp. 2d at 206-207.) At present, the agency's draft air quality objective states only that NPS will "[m]anage winter use to minimize impacts to resources that may be affected by air pollution including visibility and aquatic systems." (Scoping Newsletter at 2.) Such an indirect air quality "objective" fails to reflect the relevant standards and could accordingly weaken air quality protections, obscure meaningful differences between management alternatives, or both.

**Corr. ID:** 1688 **Organization:** United States Environmental Protection Agency

**Comment ID:** 130297 **Organization Type:** Conservation/Preservation

**Representative Quote:** Air Quality: Yellowstone National Park is a Federal Class I area, which under the Clean Air Act requires special protection of both air quality and air quality related values (AQRVs), such as visibility and deposition. The air quality Plan Objective should seek to manage winter use to avoid or minimize to the greatest extent practicable adverse impacts to air quality and Park resources that may be affected by air pollution.

**Concern ID:** 23861

**CONCERN STATEMENT:** Resources/Wilderness: Commenters stated that this objective should be removed, as it is not appropriate to expect wilderness character and values in developed areas.

**Representative Quote(s):** **Corr. ID:** 1591 **Organization:** California - Nevada Snowmobile Association

**Comment ID:** 129898 **Organization Type:** Recreational Groups

**Representative Quote:** Resources/Wilderness: this entire Objective statement should be eliminated since it is not appropriate to expect Wilderness character and values in developed areas or along road access corridors (Manage winter use in developed areas and road corridors to protect wilderness character and values.) ROS classifications differentiate between these different types of management areas and would preclude this. Wilderness is a backcountry value and should only be expected in the backcountry - not



in developed areas or along road corridors.

**Concern ID:** 23862

**CONCERN STATEMENT:** Resources/Sound: Commenters suggested that the language of this objective be modified to include language on the "percent time audibility" or to provide information on loudness, frequency, and duration.

**Representative Quote(s):** **Corr. ID:** 1494 **Organization:** CNPSR et al

**Comment ID:** 128544 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Second, NPS should assess the extent to which each of the considered alternatives minimizes both vehicle loudness and the amount of time vehicles are audible in the course of a day. At present, the agency's sound resource "objective" provides only that winter use should be managed "to protect naturally occurring background sound levels and to minimize loud noises." (Scoping Newsletter at 2.) NPS should amend this standard in order to clarify that "percent time audibility" must be considered with respect to each of the alternatives. As the NPS Natural Sounds Program commented during the 2007 winter-use-planning process, metrics focused only on loudness do not relate easily to NPS mandates because "[m]aximum dBA values do not provide any information about how often these values occur. Duration is critical to making determinations about severity of impacts to resources." (AR 125262.)

**Corr. ID:** 1688 **Organization:** United States Environmental Protection Agency

**Comment ID:** 130296 **Organization Type:** Conservation/Preservation

**Representative Quote:** Sound: EPA believes the sound Objective would be enhanced by additional clarifying language. A more inclusive Plan Objective might be, "Manage winter use to protect naturally occurring background sound levels and minimize the loudness, frequency, duration and extent of impacts to soundscapes." Loud noises were only one of the noise factors that caused the NPS to conclude park soundscapes had been impaired by historic use. The frequency (how often machine-made sounds were heard at various locations), duration (the amount of time those sounds were heard at those locations) and extent (the area in the Park over which those sounds were heard) were also part of that impairment finding.

**Concern ID:** 23863

**CONCERN STATEMENT:** Resources/Wildlife: Commenters suggested this objective be modified to focus more on the geographic area where OSV use would occur, along travel corridors.

**Representative Quote(s):** **Corr. ID:** 1688 **Organization:** United States Environmental Protection Agency

**Comment ID:** 130295 **Organization Type:** Conservation/Preservation

**Representative Quote:** Wildlife: In the past, Yellowstone's winter wildlife studies have assessed the reaction of animals adjacent to travel corridors to visitor use and administrative activities. The wildlife Plan Objective may be more easily assessed if it mirrored the available research and focused instead on managing winter use "to minimize the disturbance to animals and wildlife ecology along travel corridors, including sensitive species." If a broader approach is the intent, it will be helpful to clarify in the EIS how the disruption of winter wildlife ecology will be measured, and identify any new research that has been or will be implemented.

**Concern ID:** 23864

**CONCERN STATEMENT:** Additional Objectives: Commenters suggested adding objectives, under resources, for solitude and light - as well as suggested wording for these objective statements.

**Representative Quote(s):** **Corr. ID:** 891 **Organization:** *Not Specified*

**Comment ID:** 127697 **Organization Type:** Unaffiliated Individual

**Representative Quote:** What Park resources and values do you believe are most important and which of these should guide development of the winter use plan for Yellowstone? Why are they important?

While I have visited Park Headquarters on several occasions in the winter, I have never had the opportunity to experience the park's backcountry in the winter. However, a four year assignment at Mt. McKinley National Park [Denali] I have a deep appreciation for the values and qualities of winter environments. To your list of Resources, I would add: Solitude: Manage winter use to preserve the visitor's feeling of solitude. Light: Manage winter use so man made light does not degrade the visitor's appreciation of the night environment, including the sky. But I believe it is a mistake to assign priorities to the park's resources and values. All are interrelated, and contribute to the visitor's appreciation of Yellowstone's winter environment.

**Concern ID:** 23865

**CONCERN STATEMENT:** Additional objectives: Commenters suggested adding employee safety and cost effectiveness to objectives.

Another commenter suggested adding aquatic resources as an objective.

**Representative Quote(s):** **Corr. ID:** 891 **Organization:** *Not Specified*

**Comment ID:** 127692 **Organization Type:** Unaffiliated Individual

**Representative Quote:** I do have several questions and comments on the Plan Objectives: Under 'Resources' it may be well to consider aquatic resources. I suspect residual pollutants from winter use of snowmobiles will eventually find their way to water environments.

**Corr. ID:** 898 **Organization:** *Not Specified*

**Comment ID:** 127723 **Organization Type:** Unaffiliated Individual

**Representative Quote:** - Park employee safety and cost effective means of providing winter services to the public should be added as objectives. For example, keeping Sylvan Pass open and continuous grooming of unplowed roads are not cost effective means of providing appropriate access.

### **PN9000 - Purpose And Need: Issues And Impact Topics Selected For Analyses**

**Concern ID:** 23866

**CONCERN STATEMENT:** Commenters stated factors related to transportation that should be addressed in the plan/EIS including clarifying what roads are within the park, costs of various transportation management alternatives, and clarification on what is considered and OSV.

**Representative Quote(s):** **Corr. ID:** 321 **Organization:** *Not Specified*

**Comment ID:** 126445      **Organization Type:** Unaffiliated Individual

**Representative Quote:** The EIS should note that US 191 does pass through the park, and that there are several Park trails heads along this corridor, which provide winter use access (non-motorized) to the back country. In addition to the wheeled vehicle access to the NE entrance, the EIS should note the winter maintenance of the road to the Mammoth Terraces.

**Corr. ID:** 321      **Organization:** *Not Specified*

**Comment ID:** 126446      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Oversnow vehicle types identified for analysis should be both snowmobiles and snow coaches. However, the increased popularity of light duty vehicles (pick-ups and SUVs) fitted with Matrax or similar track replacements for tires, even including Subaru's and other conventional cars as well as ORV "4 wheelers" required definition as to exactly what constitutes an oversnow vehicle. It should be noted that the rolling resistance of such track fitted vehicles (snowcoaches) are far greater than that of a snowmobiles, and the impact of such differences noted as to fuel consumption, air quality compromise, noise (both engine and drive train/tracks) impacts on groomed snow surface and costs to passengers.

**Corr. ID:** 321      **Organization:** *Not Specified*

**Comment ID:** 126444      **Organization Type:** Unaffiliated Individual

**Representative Quote:** There is an obligation to provide winter and summer wheeled vehicle (hard surfaced winter plowed) access through the North East Entrance to the Communities of Silver Gate and Cooke City which lie in Park County, Montana, but are reached through the State of Wyoming in which the road corridor passes. I understand such obligation is linked to a maintenance agreement with the Montana Department of Transportation on US Highway 191 for that portion of the highway which is within the (western) Park boundary, north of West Yellowstone, Montana. This agreement (if any) should be displayed in the EIS. If there is no such agreement, an explanation should be offered for the Park road maintenance obligation to this community; which I believe is expressed in NPR rules governing isolated community access (including commercial service vehicles) in absence of other winter maintained roadways. If there is an evaluation of "Options for management of Cooke Pass to the east of Cooke City, Montana" as described in the Winter Use Plans DEIS, March 2007; pg. 25 - then the proposed EIS being scoped at this time, should be expanded to analyze need and impacts to the Park. There should be documentation of such impacts in this EIS process.

**Corr. ID:** 898      **Organization:** *Not Specified*

**Comment ID:** 127728      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Additional issues to consider in developing the Winter Use Plan are:

- Costs of various transportation and infrastructure management options, e.g. road grooming versus no grooming.
- Degree of Park responsibility to support the economy of gateway communities (zero in my opinion) and degree of gate community responsibility to support preservation of Park values and resources.
- Climate change and forecasts of decreasing snowpack.

**Concern ID:** 23867

**CONCERN STATEMENT:** Commenters requested that the issues be looked at on an ecosystem level.

**Representative Quote(s):** **Corr. ID:** 16 **Organization:** Winter Wildlands Alliance  
**Comment ID:** 129506 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Other issues are the plans for the Greater Yellowstone Ecosystem, which need to provide biologically effective buffers against the increasingly intrusive human impact surrounding the Park.

**Concern ID:** 23869

**CONCERN STATEMENT:** Commenters provided a list of resources they feel make Yellowstone unique and that should be addressed including: air quality, geothermal features, wildlife, geologic features, "wildness", water quality, quiet, and the range of visitor experience.

**Representative Quote(s):** **Corr. ID:** 107 **Organization:** Not Specified  
**Comment ID:** 126925 **Organization Type:** Unaffiliated Individual

**Representative Quote:** The scope of the EIS should focus on the environmental impacts to the Yellowstone Park(Park)ecosystem from oversnow vehicles and the associated human impact. Issues to be addressed must include preventing excessive negative impact to the air quality, flora, fauna, geothermal features, geologic features and in general the entire ecosystem and natural environment of the Park while still allowing some human access.

**Corr. ID:** 898 **Organization:** Not Specified  
**Comment ID:** 127724 **Organization Type:** Unaffiliated Individual

**Representative Quote:** The most important value of YNP for guiding winter use management is it "naturalness" or "wildness" and the most important resources are its air, light, weather, sounds, wildlife, thermal features, and geology. This is true because most visitors are urban dwellers seeking a taste of the wild. By allowing them to experience Park values as directly and positively as possible, they will learn to appreciate them and support their preservation. Recreation should not be an important element of winter use of YNP.

**Corr. ID:** 1482 **Organization:** Not Specified  
**Comment ID:** 128744 **Organization Type:** Unaffiliated Individual

**Representative Quote:** What park resources and values do you believe are most important and which of these should guide development of the winter use plan for Yellowstone? Why are they important?

Yellowstone is a magical place, especially in the winter absent the ever-present motorhomes and human density of summertime. I am especially taken with the tranquility of Yellowstone during winter as a sanctuary from noise (when snowmobile and snowcoaches are absent). I feel that water quality, noise pollution and wildlife security are my important resources I value in Yellowstone in the winter.

**Corr. ID:** 1591 **Organization:** California - Nevada Snowmobile Association  
**Comment ID:** 129893 **Organization Type:** Recreational Groups

**Representative Quote:** The scoping materials also ask, "What park resources and values do you believe are most important and which of these should guide development of the winter use plan?" The following park resources and values are the most important to our

membership; healthy ecosystems that protect special ecosystems for future generations; spectacular scenic areas where the vistas remain pristine while also being accessible to the public; healthy wildlife populations that are managed so resources are properly sustained and not overburdened; ability for public access to provide a full range of visitor experiences (remote to developed); and road systems that are properly maintained so they provide safe and reasonable public access.

**Concern ID:** 23870

**CONCERN STATEMENT:** Commenters requested that new and emerging technologies be considered in the range of issues in the plan/EIS.

**Representative Quote(s):** **Corr. ID:** 1435 **Organization:** Michigan Tech Keweenaw Research Center

**Comment ID:** 128945 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Electric Sleds

CSC includes a class for Zero Emissions or electric sleds. While not currently practical to replace conventional sleds, there are uses for 20 mile range electric sleds in pristine areas such as the Summit Station, Greenland. McGill University used their electric sled entry this year to assist during the Olympics at Whistler by moving children around the bottom of the ski hill. As battery technology improves and hybrid technology matures, these sleds may have a place in the NPS plan.

In conclusion, NPS cooperation with CSC will not only help educate young engineers in the issues of clean and quiet over the snow technologies, but it will help the Snowmobile Industry and its suppliers test new solutions to the protection and preservation of our natural resources.

I sincerely hope the EIS includes a component related to a continued working relationship with CSC.

**Corr. ID:** 1435 **Organization:** Michigan Tech Keweenaw Research Center

**Comment ID:** 128932 **Organization Type:** Unaffiliated Individual

**Representative Quote:** I am the lead organizer for the SAE Clean Snowmobile Challenge (CSC) held annually at the Keweenaw Research Center of Michigan Technological University. This student engineering competition formerly held in and around Yellowstone National Park maintains the tradition of the founders to educate young engineers in looking for solutions to noise and emissions concerns in our nation's parks and other pristine areas like the Keweenaw Peninsula of Michigan. Future NPS plans should consider the positive impact that CSC has had on the Snowmobile Industry and the education of young engineers in the issues related to engineering clean and quiet snowmobiles. Several dozen CSC alumni now work in the Snowmobile Industry and over 30 SAE Technical Papers have been published in conferences across the globe defining methods to make snowmobiles cleaner and quieter.

**Concern ID:** 23871

**CONCERN STATEMENT:** Commenters requested that the historic snowpack levels, and potential impacts of climate change on these levels, be addressed in the plan/EIS. Another commenter asked that the long-term costs of energy needs be addressed.

**Representative Quote(s):** **Corr. ID:** 307 **Organization:** Not Specified

**Comment ID:** 126416 **Organization Type:** Unaffiliated Individual

**Representative Quote:** In the EIS please address amounts of snowfall in the park, places of high and low snowfall, expected dates of when snowmobiles/coaches, snowshoes, skis can be used.

**Corr. ID:** 1494

**Organization:** CNPSR et al

**Comment ID:** 128519

**Organization Type:** Unaffiliated Individual

**Representative Quote:** B. The Impact of Declining Snowpack on the Reliability of Available Winter-Use Alternatives

In addition to assisting NPS's evaluation of what motorized use of the park "is appropriate and if so, in what form and at what levels" (NPS Scoping Notice), we believe new information can help NPS determine whether the forms of access it evaluates can be reliably provided. This is an important question given that this is a long-term plan.

In this context, we note that Yellowstone's recent winter seasons have included numerous periods in December and March when poor snow accumulation or early melt, respectively, have prompted NPS to curtail snowmobile access while authorizing continued access into the park by rubber-tracked snowcoaches. This was the case again during the final week of the 2009-2010 season. Based on Yellowstone snowpack data from 1949 to 2005, and the park's opening and closing dates of December 15 and March 15, respectively, NPS has good reason to expect snow conditions that preclude snowmobile access while accommodating rubber-tracked snowcoach access in winters to come. The agency's environmental analysis should account for these factors.

**Corr. ID:** 1578

**Organization:** *Not Specified*

**Comment ID:** 129876

**Organization Type:** Unaffiliated Individual

**Representative Quote:** What other issues, concerns, or suggestions do you think should be considered as we develop the new long term Winter Use Plan/EIS?

If this is a 20 year plan, the long term cost of energy needs to be analyzed, along with which type of winter use is most likely to see the most energy efficiency progress and the lowest carbon emissions. In the past the energy use, noise, and cost of oversnow has never been compared with wheeled vehicle use, and it should be in the new EIS.

US Energy Information Agency estimates the cost of crude oil to move from the current \$80/barrel to over \$140/barrel in the coming decade. What this will do to the price of oversnow travel needs to be analyzed.

Rapid improvement in the energy efficiency and emissions of licensed wheeled vehicles is currently taking place (i.e. gas/electric hybrids, small displacement direct injection turbo charged gasoline engines.) This points to ever cleaner and more efficient wheeled vehicles. There is almost no probability of similar technologies in oversnow because of the high rolling resistant track assemblies and the soft snow surface. This requires large engines operating out of EPA duty cycles, with very high emissions.

Energy use and carbon emissions: Oversnow is tremendously inefficient when compared to wheeled vehicles. The most efficient snow coaches average less than 4 MPG (3.7 NPS statistic). The fleet average small SUV/car is 24MPG (US EPA). That makes a personal vehicle more than 3 times as fuel efficient as the best snow coach per passenger mile.

Oversnow vehicles are also very polluting in comparison to an EPA approved personal vehicle. Snow coach emissions average 300 grams of CO per mile (NPS statistic) and a small SUV/car is 3.14 grams of CO per mile (US EPA). On average an oversnow vehicle is 35 times more polluting per passenger mile than a wheeled vehicle.

The EIS should analyze and estimate the number of gallons of fuel necessary to maintain Oversnow operations during the winter season and compare that with the amount of fuel necessary if wheeled vehicles were used.

**Corr. ID:** 1578                      **Organization:** *Not Specified*

**Comment ID:** 129880            **Organization Type:** Unaffiliated Individual

**Representative Quote:** Climate change and snow pack levels: The last twenty years have seen a steady decline in snowpack throughout the park. Each year Oversnow operations are difficult to start with adequate snow cover by mid December. Each year tends to have a lack of snow for continued OSV travel in March, which then requires a change over to wheeled vehicles to finish the winter season. If this is a 20 year plan the effects of climate change should be analyzed as to how they affect the viability of a full OSV season from Dec. 15 to March 15.

**Concern ID:**                      23872

**CONCERN STATEMENT:** Commenters stated that wildness should not be an issue addressed in the plan/EIS as this is not a resource along road corridors and developed areas.

**Representative Quote(s):**    **Corr. ID:** 1473                      **Organization:** International Snowmobile Manufacturers Association

**Comment ID:** 128800            **Organization Type:** Unaffiliated Individual

**Representative Quote:** Wilderness issues continue to enter into the discussion. Wilderness character and values in developed areas along the road where snowmobiling and snow coaches operate should not be considered. Wilderness is a backcountry value and should be expected only in the backcountry, not along road corridors that have been developed and used for more than 100 years.

**Corr. ID:** 1647                      **Organization:** International Snowmobile Manufactures Association

**Comment ID:** 129929            **Organization Type:** Business

**Representative Quote:** Wilderness issues continue to enter into the discussion. Wilderness character and values in developed areas along the road where snowmobiling and snow coaches operate should not be considered. Wilderness is a backcountry value and should be expected only in the backcountry, not along road corridors that have been developed and used for more than 100 years.

**Concern ID:**                      23873

**CONCERN STATEMENT:** Commenters requested that the issue of Emergency Medical Services (EMS) be addressed in the plan/EIS.

**Representative Quote(s):**    **Corr. ID:** 1503                      **Organization:** *Not Specified*

**Comment ID:** 128460            **Organization Type:** Unaffiliated Individual

**Representative Quote:** Here would be areas of concern I hope the EIS will take into account and really weigh the true measure of plowing the road vs. over snow use:

Energy use and carbon emissions

Sound emissions

Emergency Medical Services (EMS), Medical Emergencies of Tourists

Cost of actual grooming (as is done now) vs. plowing

Climate change and snow pack levels (low snowpack becoming the norm of late)

Socio-economic issues, affordable access for all being my greatest concern.

AND Wildlife.

**PO2000 - Park Operations: Methodology And Assumptions**

**Concern ID:** 23906

**CONCERN STATEMENT:** Commenters requested that the plan/EIS analyze the manpower and human resourced that would be dedicated to carrying out each alternative (personnel, equipment, facilities, concessionaire services, and IT).

**Representative Quote(s):** **Corr. ID:** 321 **Organization:** *Not Specified*

**Comment ID:** 126443 **Organization Type:** Unaffiliated Individual

**Representative Quote:** The EIS should display all human resources dedicated to Winter Use Management including personnel (primary winter use protection, interpretive, and administrative staff requirements); equipment (groomers, snowmobiles, snow coaches/ambulance, snow plows); facilities (maintenances, offices, entrance/duty stations, visitor comfort stations/warming huts); concessionaire service requirements (facilities, employee housing, administrative vehicles) and information technology resources (web site and other public communication).

**Concern ID:** 23907

**CONCERN STATEMENT:** Commenters asked that the plan/EIS analyze the costs associated with an alternative that plows roads, and requested a cost analysis between plowing and grooming of the roads.

**Representative Quote(s):** **Corr. ID:** 359 **Organization:** *Not Specified*

**Comment ID:** 126626 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Even with the current system of plowing the roads, in the spring and as late as late April, the plows at time have trouble keeping Swan Lake Flats open due to drifting. How to keep Hayden Valley, Fountain Flats, and along Lake Yellowstone open, not to mention Craig Pass, and the Norris to Canyon Road open all winter when these areas receive substantially more snow and are known to create 10-20 foot drifts?

And if you are confident these areas can be maintained, who is going to pay for it? The cost of running a rotary plow all winter is not cheap. The park cannot even afford to maintain Sylvan Pass for over snow travel, how are they going to pay for (and achieve)keeping these roads open all winter.

We live in a time of drought and the snow levels are not what they used to be even 10-15 years ago. If the cycle goes back to higher precipitation what then?

Then we have Bison Migration, and winter stress on all wildlife.

I have always looked as winter and the shoulder seasons as a resting time for the park after the huge impact of the summer and at a time when the wildlife is stressed the most.



**Corr. ID:** 390                      **Organization:** *Not Specified*

**Comment ID:** 126693            **Organization Type:** Unaffiliated Individual

**Representative Quote:** The only thing not being addressed by those who are proponents of plowing is the cost of multiple trips daily to sand the road and visually inspect it for ice, rocks in roadway, or other conditions. The cost of sand, and possible use of ice-melting chemicals in the Park also needs to be considered. Also--they fail to mention increased road-surface maintenance costs caused by plowing, and the cost of plowing and maintaining scenic pullouts, etc. Furthermore, vehicle accidents and impacts on wildlife could increase and needs extensive analysis. Buffalo jams would could be much more significant than in the summer--even with less vehicles, because the critters don't have as much room to get out the roadway due to snowbanks. Also--how will you handle a big "blizzard condition" to get cars in our out??

**Concern ID:** 23908

**CONCERN STATEMENT:** One commenter noted the high costs of transporting goods and services oversnow into the park.

**Representative Quote(s):** **Corr. ID:** 1578                      **Organization:** *Not Specified*

**Comment ID:** 129883            **Organization Type:** Unaffiliated Individual

**Representative Quote:** Concessionaire and park employee operations and safety: Oversnow travel greatly complicates both the parks and the concessionaires operation at Old Faithful. Fresh food and produce has to be hauled for visitors and employees at great expense. High fuel usage and carbon emissions are a consequence of hauling supplies oversnow. In some cases snowmobiles and sleds are even used, at risk to employees. Light trucks are much more fuel efficient and safer with air bags and seatbelts.

**Concern ID:** 23910

**CONCERN STATEMENT:** One commenter requested that the plan/EIS address NPSs responsibility to groom trails for non-motorized uses.

**Representative Quote(s):** **Corr. ID:** 1502                      **Organization:** Friends of Pathways

**Comment ID:** 128487            **Organization Type:** Unaffiliated Individual

**Representative Quote:** - The EIS sections on park management and operations should recognize the responsibility of the Park Service to help groom for Nordic skiing and other non-motorized uses in Yellowstone. If the NPS grooms snowmobile trails, it should also groom for non-motorized. This responsibility should not fall only to the concessionaire. Base funding increases should be provided to YELL to groom these Nordic Trails.

## **SE2000 - Socioeconomics: Methodology And Assumptions**

**Concern ID:** 23911

**CONCERN STATEMENT:** Commenters requested that the plan/EIS analysis consider the impacts of the economy of surrounding communities.

**Representative Quote(s):** **Corr. ID:** 335                      **Organization:** *Not Specified*

**Comment ID:** 126571            **Organization Type:** Unaffiliated Individual

**Representative Quote:** Our winter economy has dwindled substantially since the first snowmobile regulations went into effect for the 2004 winter season. In 1986, the Town

implemented the first 3% "Resort Tax" in the state. The numbers below clearly show the impact West Yellowstone felt due to the snowmobile regulations. Our winter tax collections have decreased from a high of \$588,344 for the Fiscal Year 2001 winter season to a low \$433,348 for the Fiscal Year 2005 winter season. Collections tend to fluctuate due to a variety of factors including snow conditions, publicity, and inflation, but there is no disputing the fact the implementation of snowmobile regulations by the Park caused a major decrease in collections. If you average the three years preceding the regulations and the three years after the regulations, the average decrease due to the band would be approximately \$100,000 per year- not accounting for inflation. This number equates to an average revenue decrease of the winter economy in West Yellowstone of \$3.3 million dollars per year! If you figure the difference between the highest year (2001) and the lowest year (2009) the difference equates to over \$5.5 million dollars in lost revenue for one year!

	December	January	February	March	April	Total
FY 1999	\$29,869	\$81,410	\$134,178	\$190,969	\$59,079	\$495,505

FY 2000	\$24,573	\$75,499	\$169,921	\$188,090	\$65,585	\$523,668
FY 2001	\$43,394	\$98,911	\$164,874	\$172,164	\$109,001	\$588,344
FY 2002	\$44,362	\$98,967	\$172,726	\$167,329	\$97,974	\$581,385
FY 2003	\$29,601	\$97,591	\$141,247	\$142,206	\$94,990	\$505,635
FY 2004	\$38,014	\$85,720	\$94,990	\$144,500	\$72,792	\$436,016
FY 2005	\$51,342	\$56,743	\$97,975	\$107,822	\$119,466	\$433,348
FY 2006	\$40,972	\$74,646	\$117,842	\$114,091	\$116,686	\$464,237
FY 2007	\$47,742	\$90,073	\$125,668	\$145,985	\$69,818	\$479,286
FY 2008	\$36,088	\$88,192	\$141,305	\$170,659	\$84,122	\$520,366
FY 2009	\$35,482	\$86,064	\$109,445	\$125,133	\$66,802	\$422,926

**Corr. ID:** 1464                      **Organization:** *Not Specified*

**Comment ID:** 128927              **Organization Type:** Unaffiliated Individual

**Representative Quote:** Economic impacts have been central to the debate of winter use in Yellowstone National Park. In order to address economic concerns with regard to the Park Service's conservation mission long-term and short-term economic tradeoffs between alternatives need to be provided as part of the analysis. This requires defining the span of time encompassed in both timelines as well as developing a comprehensive set of variables that can be quantified. Although, it is recognized that many environmental goods and services have not yet been priced in the market and will serve as an analytical challenge.

**Corr. ID:** 1476                      **Organization:** *Not Specified*

**Comment ID:** 128809              **Organization Type:** Unaffiliated Individual

**Representative Quote:** Dear NPS,

As you consider your long range planning for environmental impacts and usage of Yellowstone Park, I hope that you will keep in mind the economic needs of surrounding communities.

Many of these communities have already suffered from reduced income due to the reduction of game animals because of wolf reintroduction. Further lowered limits of clean snowmobile touring would hurt them even more.

People in these small towns don't have many job opportunities open to them. As an agency of the federal government, whose employer is the people of the nation, you owe it to your local constituents to do everything in your power to help them.

**Corr. ID:** 1524                      **Organization:** *Not Specified*

**Comment ID:** 128267      **Organization Type:** Unaffiliated Individual

**Representative Quote:** You have an obligation to keep these economies healthy by keeping the park open and affordable for visitors all year long. I hear about the Yellowstone eco-system in terms of wildlife...but you also need to consider the Yellowstone economic system as well. It will only help the park when the gateway towns can be healthy enough to provide nice places for visitors to come and visit the park without placing undue burden on the parks restrooms, restaurants, hotels, etc. The towns and the park should have a symbiotic relationship. It would be a useful exercise to price out the cost of a visit to the park along with travel for a family in winter and in summer.

**Corr. ID:** 1578      **Organization:** *Not Specified*

**Comment ID:** 129881      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Socio-economic issues: At the current price of entry, the cost to enter the park via oversnow (\$110-140) is much too high. This is almost double what it costs to go to Disneyland (\$79). The effects on the gateway communities of the current oversnow plan and any future plan need to be looked at carefully. By granting transportation monopolies to a few businesses, what has developed is a concentration of wealth into the accounts of these few companies.

Commercial winter deposits in West Yellowstone have dropped 36% in 9 years from 2001-2010 (First Security Bank, West Yellowstone statistic). This does not take into account inflation, and more and more small businesses, without a concessionaire permit, close for the winter each year. This has had a dramatic effect on employment (outside of the permittee's businesses) across the whole town. West Yellowstone is dependent upon YNP for the vitality of their economy, and because of the region's remote location have little opportunity for economic diversity. The park needs to find a winter plan that does not create monopolies that are tied to an exclusive transportation permit.

**Corr. ID:** 1648      **Organization:** Utah Snowmobile Association

**Comment ID:** 129915      **Organization Type:** Civic Groups

**Representative Quote:** Throughout the long planning effort process, the NPS is still not placing appropriate emphasis on the social and economic importance of snowmobile in YNP. In Utah, alone, frequent family trips to YNP in the winter are a highlight that provides an opportunity to appreciate scenery and wildlife unparalleled with any other location. We contribute to the economic viability of surrounding communities and certainly participate in the goal to increase visitation to our national parks. A new Winter Use Plan must take into consideration the devastating impact to local economies and the decline in social expectation if snowmobiling is further curtailed or eliminated within YNP.

**Concern ID:** 23912

**CONCERN STATEMENT:** Commenters stated that the NPS was not charged with ensuring the economy of the surrounding communities, and that they did not believe the adverse impacts of a reduction in OSV use would be large.

**Representative Quote(s):** **Corr. ID:** 316      **Organization:** *Not Specified*

**Comment ID:** 126432      **Organization Type:** Unaffiliated Individual

**Representative Quote:** I note that the evaluative process will include "socio-economics". Nowhere in the national park charter can you find a hint of concern or interest in the economics of gateway communities. Our parks were not created for the economic benefit of communities, states or even the nation. Even a consideration of this element is inconsistent with the mission of our national parks.

**Corr. ID:** 352

**Organization:** *Not Specified*

**Comment ID:** 126608

**Organization Type:** Unaffiliated Individual

**Representative Quote:** The constant arguments by surrounding towns about the adverse effects on their economies should not be a deciding factor in these decisions. With the enormous amount of visitation during spring summer and fall, those businesses that profit from their being able to operate in the immediate vicinity of a park and then, complain because the NPS rightly places restrictions on such visitation that creates a negative effect on the park's wildlife which, in the long run directly effects the animals in the park should not be the deciding factor in park restrictions.. The NPS rightly has a responsibility to protect both the park and it's wildlife.

**Corr. ID:** 1423

**Organization:** Rock the Earth

**Comment ID:** 128880

**Organization Type:** Unaffiliated Individual

**Representative Quote:** While the decrease or loss of snowmobiling opportunities in the parks certainly equates to an "adverse economic impact," these impacts "are not considered irreversible or long term in the context of the total economy." It is possible that the negative regional impacts of some alternatives (such as banning snowmobiles) could be offset by a change in the type and mix of visitors coming to the parks. In fact, based on the analysis conducted by the NPS, the gains to non-snowmobilers generally outweigh the losses to snowmobilers and local businesses. 69 FR 54081. See also, 2007 DEIS at 173. (emphasis added).

The NPS analyzed economic issues that may arise under various proposed alternatives in the 2007 FEIS. Findings showed that individuals and businesses in communities surrounding the parks could potentially be affected by the implementation of the various alternatives, though overall, according to studies cited in the 2007 FEIS, tax data from recent years indicates that snowmobile use in the parks has declined, as has overall visitation, but the economy has not been affected in most areas. Lodging and tax data for the Parks indicates that declines in snowmobile entry into the Parks as well as winter visitation to the Parks in general have not "detectably impacted" the economies of the counties surrounding the parks. The NPS determined that the only one of 5 regional economic areas examined would be economically affected by changes in winter use management of the parks. In fact, according to the NPS, rebounding and snowcoach passengers have been increasing since the 1996-1997 Winter Season. Furthermore, the number of visitors in the parks since the 1996-1997 Winter Season has been increasing while the levels of snowmobile use have been decreasing.

Therefore, despite claims by businesses in the gateway communities that banning snowmobiles will have an irreversible, permanent, and dramatic negative impact on the local economy, the evidence to date does not support such claims and, in fact, contradicts them.

**Corr. ID:** 1423

**Organization:** Rock the Earth

**Comment ID:** 128879

**Organization Type:** Unaffiliated Individual

**Representative Quote:** VII. A Winter Use Plan Eliminating Snowmobile Use Would Not Result in a Significant Adverse Economic Impact.

One of the principal claims by the business communities and park concessionaires in the "gateway communities" surround the Parks is that the elimination of snowmobiles in the Parks will cause a devastating economic hardship on those who rely on the income from snowmobile rentals and sales. Furthermore, such interests claim that "snowcoaches only" is not financially feasible.

The fact of the matter is that the social and economic impacts related to the elimination of most snowmobile use in the Parks was thoroughly considered by the NPS prior to

developing the interim winter use policy. The NPS concluded that the negative economic impacts to snowmobile vendors could be mitigated to a high degree by providing oversnow access using mass transit snowcoaches.

**SE3000 - Socioeconomics: Study Area**

**Concern ID:** 23874

**CONCERN STATEMENT:** One commenter requested that Big Sky be included in the study area for the socioeconomic analysis.

**Representative Quote(s):** **Corr. ID:** 1589 **Organization:** Montana Fish, Wildlife, and Parks

**Comment ID:** 129842 **Organization Type:** State Government

**Representative Quote:** Consider Big Sky as a Gateway Community to the park due to its level of use into and proximity to the park.

**SE4000 - Socioeconomics: Impact Of Proposal And Alternatives**

**Concern ID:** 23875

**CONCERN STATEMENT:** Commenters stated that if the park is closed to winter use, the local economy would be adversely impacted.

**Representative Quote(s):** **Corr. ID:** 1310 **Organization:** *Not Specified*

**Comment ID:** 127712 **Organization Type:** Unaffiliated Individual

**Representative Quote:** As a resident of West Yellowstone I know first hand the hardships that come from living and working in a town that has two off seasons where work is hard to find.

West Yellowstone cannot sustain a viable winter economy by supporting a plan that allows limited/guided/costly snowmobile and snowcoach access.

**Corr. ID:** 1356 **Organization:** *Not Specified*

**Comment ID:** 127691 **Organization Type:** Unaffiliated Individual

**Representative Quote:** I've been a business owner here in Cooke Since 1986. I have seen some really good things and some bad things go on with the park. But if you keep cutting out winter activities inside the park, this will effect everyone around it. Some times I feel that the YNP would like to just buy us out. If that is true, I'd be glad to sell out for a fair market value. But please don't close the park to winter sports. It has hurt West Yellowstone and we in Cooke City are starting to feel the impact on it as well. I know most of us would like to see the road opened east of town all year round. The way the economy is, the surrounding towns need to start looking at other ways to help bring in business.

**Corr. ID:** 1420 **Organization:** *Not Specified*

**Comment ID:** 127672 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Plus look at all the jobs and money that will be lost if you close Yellow Stone fore the winter!

**Corr. ID:** 1458 **Organization:** West Yellowstone Economic Development Inc.

**Comment ID:** 128891      **Organization Type:** Unaffiliated Individual

**Representative Quote:** A key goal of our organization has been to develop projects and ideas that diversify the economy of West Yellowstone and broaden its base. We are pursuing this goal because we believe a diverse economy is a healthy economy. Recently, we have been forced to seek diversification at a more extreme pace because of the lost revenue caused by the curtailment of snowmobile access into Yellowstone National Park. Access to the Park in the summer and the winter, by snowmobile, snow coach, or any other means, has been and still is the most important component of the West Yellowstone economy.

For this reason, the key issue for us in regards to the EIS is access to the Park. The West Yellowstone community has a very large stake in the health and vitality of the Park. We support the National Park Service (NPS) efforts in managing the Park for the good of all. However, it is our belief that the Park is vastly underutilized in the winter season. Consequently many lodging, restaurant, equipment rental, and gift shop businesses are no longer open in the winter. School enrollment is in decline. This community simply cannot survive with the current level of Park access that is being allowed during the winter time.

**Corr. ID:** 1581      **Organization:** West Yellowstone Economic Development

**Comment ID:** 129839      **Organization Type:** Non-Governmental

**Representative Quote:** If the numbers of daily snowmobiles and snow coaches are not increased or if the proposed numbers (whether they are sufficiently high enough or not) are instantly and continually litigated, the end result will be limited access to the Park which in turn will continue to negatively impact the West Yellowstone community.

**Concern ID:** 23876

**CONCERN STATEMENT:** One commenter requested that the socioeconomic impact analysis not only look at loss of revenue from OSV use, but the potential economic values of not permitting OSV in the park.

**Representative Quote(s):** **Corr. ID:** 1566      **Organization:** Animal Welfare Institute

**Comment ID:** 129269      **Organization Type:** Conservation/Preservation

**Representative Quote:** In particular, the NPS has consistently, yet unnecessarily, devoted considerable analysis of the economic impacts of its winter use management proposals and alternatives to those proposals even though the NPS has no obligation to authorize or permit use to protect or benefit the economic health of gateway communities, the regional economy, or the economies of Wyoming, Montana or Idaho. Nevertheless, as demonstrated in its past analyses, the economic impact of even terminating all oversnow motorized winter recreational use in YNP will not have a significant economic impact on any community, the region, or any of the states surrounding YNP. If the NPS elects to engage in yet another analysis of the economic impacts of winter use management in YNP, it must, as previously recommended, provide a complete analysis by quantifying and considering the economic impacts of not permitting oversnow motorized recreational use (e.g., snowmobile/snowcoach) use in YNP. In other words, an analysis of economic impacts can't simply focus on the loss of revenue associated with a reduction, phase out, or termination of oversnow motorized recreation but also must consider the economic value of such actions (i.e., the economic value of restoring natural regulation to YNP; the economic value to YNP of having a period of the year when motorized use is not permitted in the park in terms of air quality, natural soundscapes, wildlife health). Though quantifying the economic value of significantly reducing or terminating oversnow motorized recreation (including road packing/grooming) in YNP may be difficult, it can and should be done in this case.

**SS2000 - Soundscapes: Methodology And Assumptions**

**Concern ID:** 23877

**CONCERN STATEMENT:** Commenters requested that the plan/EIS analysis include noise pollution, with some commenters noting the regulatory authority in which NPS must consider impacts to soundscapes.

**Representative Quote(s):** **Corr. ID:** 15 **Organization:** *Not Specified*

**Comment ID:** 129161 **Organization Type:** Unaffiliated Individual

**Representative Quote:** The noise pollution should factor into the study.

**Corr. ID:** 1423 **Organization:** Rock the Earth

**Comment ID:** 128866 **Organization Type:** Unaffiliated Individual

**Representative Quote:** V. The Negative Impact that Snowmobiles Have on the Natural Soundscape Warrants a Ban on Snowmobile Use.

As stated in the 2007 FEIS, "soundscapes are a key resources, as well as a highly prized (and expected) element of the park visitor experience." In the 2008 EA, the NPS goes on to emphasize the importance of natural soundscapes in the Parks:

An important part of the NPS mission is to preserve or restore the natural soundscapes associated with units of the National Park System. The 2006 NPS Management Policies defines the "natural ambient sound level" as "the environment of sound that exists in the absence of human-caused noise," and considers this to be the "baseline condition, and the standard against which current conditions in a soundscape will be measured and evaluated" (NPS 2006: 8.2.3) (however, in Environmental Consequences, comparisons are made against existing ambient conditions because the monitoring information upon which analysis was based included all ambient sounds--such as other human-caused sounds like exhaust fans

and voices--some of which obscured the sound of OSVs). Further, the NPS "will restore to the natural condition wherever possible those park soundscapes that have become degraded by unnatural sounds (noise), and will protect natural soundscapes from unacceptable impacts" (NPS 2006: 4.9). Although "park visitors also expect sounds ? associated with people visiting their parks (such as children laughing, park interpretive talks, motors in cars and motorboats)", NPS's 2006 Management Policies direct that "the Service will take action to prevent or minimize those noises that adversely affect the visitor experience or that exceed levels that are acceptable to or appropriate for visitor uses of parks" (NPS 2006: 8.2.2).

**Corr. ID:** 1566 **Organization:** Animal Welfare Institute

**Comment ID:** 129282 **Organization Type:** Conservation/Preservation

**Representative Quote:** Finally, though this issue will likely be subject to considerable discussion in the EIS, the impact of oversnow motorized recreation on the natural soundscape of YNP is of critical importance. AWI notes that a recent edition of Park Science magazine was largely devoted to natural soundscapes and the responsibility of the NPS to manage those areas under its jurisdiction to preserve natural quiet. While technological changes to oversnow motorized vehicles and restrictions imposed on said vehicles by the NPS have reduced their impact to the natural soundscape of YNP, those vehicles that continue to be used in the park continue to emit noise that can impact/impair the natural soundscape.

**Concern ID:** 23878

**CONCERN STATEMENT:** Commenters stated concerns with noise generated from snowcoaches they felt should be addressed in the plan/EIS. This included conducting more monitoring of snowcoach noise, explaining why snowcoaches are preferred if they are louder than snowmobiles, as well as providing possible data the NPS could use to analyze the sound impacts from snowcoaches.

**Representative Quote(s):** **Corr. ID:** 1524 **Organization:** *Not Specified*  
**Comment ID:** 128264 **Organization Type:** Unaffiliated Individual

**Representative Quote:** SOUND:

I believe I have read in your reports that snowcoaches are noisier than BAT snowmobiles...so why are they preferred? We have visited the park on snowmobiles with and without guides as well as by snowcoach. I must say that the only time I saw frightened buffalo was from the snowcoach. I think they are intimidated by the size and sound. When we were on the snowmobiles they ignored us. I think it is unrealistic to have more stringent sound restrictions in winter than in summer. How can you defend such discrimination? We would all love to have idyllic peacefulness around us, but this is a geologic park and needs to be available to the people who are footing the bill to support it.

**Corr. ID:** 1578 **Organization:** *Not Specified*

**Comment ID:** 129877 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Sound emissions: Oversnow is noisy, obnoxiously loud, with no probability of any improvement, ever. If anything as older Bombardier snowcoaches are increasingly replaced with newer quad track style busses, the noise levels are increasing. The quietest snow coaches, the older Bombardiers, have been measured at an average of 70 decibels (NPS statistic). Moderate wheeled vehicle traffic is measured at an average 50 decibels (US EPA), which means the quietest snowcoaches are more than four times louder than wheeled traffic. The newer, large quad tracked busses are as much as nine times louder (85 decibels) than wheeled vehicles. If one of the park's stated goals is to increase visitation on the West side, and oversnow is chosen, how much noise is acceptable?

**Corr. ID:** 1590 **Organization:** Montana Department of Environmental Quality

**Comment ID:** 129856 **Organization Type:** State Government

**Representative Quote:** The SAE CSC competition teams have measures significant differences in noise levels from the left and right sides of the snowmobiles, just as Scarpone did with snowcoaches. However, the SAE CSC teams used this information to attenuate noise from the louder vehicle pieces, thus reducing the overall noise output. The Scarpone work appears to attribute all noise to engine noise and does not differentiate between engine, transmission, turbochargers, and other appliances. A bit of research into the SAE CSC papers may quickly develop a few alternatives for snowcoaches. This will be a challenge due to the variety in vehicles and configurations (exhaust location, engine, transmission, tracks and vehicle height (e.g. they were all measured by EPA criteria at an elevation within inches of the road)). It might be helpful if future work could address some of this and if results could be modeled for the upcoming EIS.

SAE CSC teams have also noticed that more heavily loaded vehicles, such as a heavier operator, emit less track noise and are less noisy at higher speeds. This may or may not be the case for snowcoaches but one of two (noisy and quiet coaches) could be evaluated during the upcoming winter to determine if there is a correlation.

Lastly, application of some of Scarpone's research as a management tool might help



reduce the OSV noise issues in key areas. Maintenance of low snow berms along groomed trails at key areas near visitor areas, as well as some areas for back country use, may be a means to attenuate some snowcoach noise as identified by Scarpone, 2009. The study also identified that NPS can model this effect.

**Corr. ID:** 1590                      **Organization:** Montana Department of Environmental Quality

**Comment ID:** 129852              **Organization Type:** State Government

**Representative Quote:** The soundscape work of Scarpone et al (2008, 2009) with snowcoaches is on the correct track, but more information/data needs to be developed to assist snowcoach operators in improvements to sound attenuation on their current and future machines to comply with BAT requirements. Scarpone even suggests one of the remedies is "modifying the vehicle to reduce sound level" (Scarpone, 2009 page 21/96, solid bullet 4, point 2), but not much guidance is given to accomplish this,

Support of such applied science/developmental research may be the most cost-effective way for achieving the soundscape goals and public viewing requirements for the upcoming EIS.

For example, a number of teams in the SAE CSC have identified that snowmobile engine noise dominates the vehicle until a speed between 25 to 35 miles per hour is reached, which is when track and transmission noise become dominant. Observing the graphs from Scarpone (2009 Appendix), it appears this change in dominate noise occurs at a lower speed for snow coaches (possibly below 20 mph).

**Corr. ID:** 1688                      **Organization:** United States Environmental Protection Agency

**Comment ID:** 130304              **Organization Type:** Conservation/Preservation

**Representative Quote:** The research and monitoring of snowcoach noise to date has not attempted to assess the source(s) of the loudest noise from snowcoaches. We recommend such monitoring be added in the next monitoring cycle. In order to cost effectively reduce snowcoach noise, it is important to understand the relative contribution to the noise profile of engine compartment noise, exhaust noise and track noise. With such information, it may be possible to include available mitigation in the BAT definition regarding muffler technology, track technology (material, width, length, track design), over-snow tire technology, etc.

The most recent snowcoach monitoring reports showed the correlation between vehicle speed and noise produced for each snowcoach monitored. If the NPS remains concerned with snowcoach noise, it would seem possible to design an individual, snowcoach-specific speed limit to prevent exceeding the decibel threshold. Such a limit would encourage operators of louder snowcoaches to improve their fleet in order to compete in the market-place.

**Concern ID:** 23880

**CONCERN STATEMENT:** Commenters suggested noise modeling techniques and data that should be included in the plan/EIS. Suggestions included using impact definitions that do not have a park-wide metric, looking at both sound quality as well as sound pressure, consideration of previous planning efforts sound thresholds, and correlation of EPA standards and NPS monitoring protocols.

**Representative Quote(s):** **Corr. ID:** 1202                      **Organization:** Idaho Department of Parks & Recreation

**Comment ID:** 126539              **Organization Type:** Unaffiliated Individual

**Representative Quote:** The NOI indicated that natural soundscapes would be an issue analyzed in the EIS. The NPS has an obligation to protect natural soundscapes, but the existing acoustic standards and thresholds developed in previous winter use plans were developed without social research. Is it really reasonable to expect a 50% audible period in a developed area during the day that attracts the most visitation? This planning process should use social research to determine what sound thresholds are appropriate throughout the range of management zones.

**Corr. ID:** 1435                      **Organization:** Michigan Tech Keweenaw Research Center

**Comment ID:** 128940            **Organization Type:** Unaffiliated Individual

**Representative Quote:** Some thoughts related to Noise Measurements

The measurement of snowmobile noise using a wide open throttle standard that uses sound pressure (SAE J192) is different than other SAE vehicle noise standards that use sound power. The standard using sound pressure is difficult to repeat from day to day whereas sound pressure can be corrected for environmental conditions using a standard noise source and thus more comparable over the season. In the first few years of CSC we used sound power and then gave in to pressures to use the J192 Noise Standard because of its acceptance in the Snowmobile Industry. In 2009, all sleds failed because of icy (hard) conditions even though the test was run within the specifications of the standard. In CSC 2010, we ran the test on grass due to lack of snow but again within the specifications of the standard. Three sleds passed. There is no easy way to calibrate sound pressure measurements for changes in surface hardness. Clearly more work needs to be done to identify methodologies that produce consistent and comparable results when defining "quiet" for over the snow vehicles.

Sound quality is also measured at CSC and there are instances where sound quality is more important to the observer than sound pressure. For example in CSC 2010 the quietest sled according to J192 was not the most pleasing in terms of sound quality. Perhaps frequency content related to engine versus track noise should be considered in the standards. Papers have been presented at the SAE Noise and Vibration conference on this and there are other references from other Michigan Tech researchers and from CSC that could help define sound quality metrics.

**Corr. ID:** 1482                      **Organization:** *Not Specified*

**Comment ID:** 128750            **Organization Type:** Unaffiliated Individual

**Representative Quote:** Sound

In preparation of the EIS I encourage careful exploration of available sound data for both operational equipment (groomers and snowplows) and personal access vehicles (automobiles, snowcoaches and snowmobiles). I expect the plowing alternative to compare favorably in environmental impact.

**Corr. ID:** 1494                      **Organization:** CNPSR et al

**Comment ID:** 128539            **Organization Type:** Unaffiliated Individual

**Representative Quote:** First, NPS's soundscape analysis should utilize impact definitions that are capable of meaningfully assessing the impacts of available alternatives on a visitor's experience of Yellowstone's natural soundscape. A "park-wide metric" is unsuited to this task. (Greater Yellowstone Coalition, 577 F. Supp. 2d at 199.)

**Corr. ID:** 1494                      **Organization:** CNPSR et al

**Comment ID:** 128546            **Organization Type:** Unaffiliated Individual

**Representative Quote:** Third, any modeling of potential soundscape impacts should be conducted in a manner that is both consistent with available monitoring data and

evenhanded in its handling of the available alternatives. Modeling results that appear to underestimate vehicle noise or treat the considered alternatives inconsistently cannot provide a reasoned basis for NPS's ultimate decision. (See Greater Yellowstone Coalition, 577 F. Supp. 2d at 198-201.)

**Corr. ID:** 1590                      **Organization:** Montana Department of Environmental Quality

**Comment ID:** 129849              **Organization Type:** State Government

**Representative Quote:** Noise levels appear to still be a concern, though, and OSV numbers may need to be limited to protect the Yellowstone soundscape resource. The individual vehicle sound measurements, as regulated by the Environmental Protection Agency, need to be better correlated with the NPS ambient soundscape measuring methods to achieve appropriate results. For example, limited an individual snowmobile sound to 73 dBA with appropriate BAT measurements will not equal and will possibly always exceed the ambient level noise measurements if the snow machines are required to be in a guided group of 6 to 100 snowmobiles. There may be a better way to correlate the two for the desired resource preservation, as accomplished with emissions (Society of Automotive Engineers' Clean Snowmobile Challenge (SAE CSC) 2001, 2002 summary, and work by NPS with Southwest Research Institute (2001-2203) and Dr. Gray Bishop, 1998-2007).

#### ***SS4000 - Soundscapes: Impact of Proposal And Alternatives***

**Concern ID:** 23881

**CONCERN STATEMENT:** Based on the analysis from past planning efforts, commenters stated that snowmobiles should be removed from the park to lessen the impact to the soundscape.

**Representative Quote(s):** **Corr. ID:** 1423                      **Organization:** Rock the Earth

**Comment ID:** 128867              **Organization Type:** Unaffiliated Individual

**Representative Quote:** In the 2007 FEIS, the NPS determined that visitors to Old Faithful heard snowmobiles more than 67% of the time and that threshold was exceeded even with the 250 snowmobile per day limit.

Ironically, the 2008 EA notes that the Soundscape in the Parks in winter is particularly quiet absent human activity. 2008 EA, 3-17 through 3-20. It is this particular solitude and quiet that many visitors to the Parks travel great distances to experience - the Parks in winter present a unique experience in the absence of human activity (especially activity at the levels allowed by the interim policy).

In order to lessen the negative impact on visitor experience in terms of the natural soundscape, thereby positively enhancing visitors' winter use experiences in the Parks and removing this impairment to park resources, the NPS should develop a long term Winter Use Plan prohibiting the use of snowmobiles in the Parks.

#### ***VA1000 - Visitor Use and Experience: Guiding Policies, Regs And Laws***

**Concern ID:** 23882

**CONCERN STATEMENT:** Commenters noted sections of the NPS 2006 Management Policies, Executive Orders, and the Organic Act that the NPS should consider during the analysis of impacts to visitor use and experience.

**Representative Quote(s):** **Corr. ID:** 1423                      **Organization:** Rock the Earth

**Comment ID:** 128851              **Organization Type:** Unaffiliated Individual

**Representative Quote:** III. The Negative Impact that Snowmobiles Have on Visitor Experience Warrants a Ban on Snowmobile Use in the Parks.

NPS Management Policy 8.2 sets forth the standard that the NPS is to follow to insure that visitors' uses of the Parks are being adequately protected. At the outset, that Policy states: "Enjoyment of park resources and values by the people of the United States is part of the fundamental purpose of the parks." NPS Management Policy 8.2. To provide for enjoyment of the parks, the NPS will encourage visitor activities that:

- Are appropriate to the purposes for which the park was established;
- Are inspirational, educational, or healthful and otherwise appropriate to the park environment; and
- Can be sustained without causing unacceptable impacts to park resources or values.

NPS Management Policy 8.2.; see also, 2007 ROD, at 27.

Furthermore, the NPS will not allow visitors to conduct activities that:

- Would impair park resources or values;
- Create an unsafe or unhealthful environment for other visitors or employees; or
- Unreasonably interfere with: the atmosphere of peace and tranquility, or the natural soundscape maintained in wilderness and natural, historic or commemorative locations within the park.

NPS Management Policy 8.2.; see also, 2007 ROD, at 29.

**Corr. ID:** 1423

**Organization:** Rock the Earth

**Comment ID:** 128833

**Organization Type:** Unaffiliated Individual

**Representative Quote:** Looking beyond statutory law, Executive Orders also support a conclusion that NPS should prohibit snowmobile use. Areas and trails for off-road vehicle use shall be located in areas of the National Park system only if the agency head determines that off road vehicle use in such locations will not adversely effect their natural, aesthetic or scenic values. Executive Order 11644, Use of Off-Road Vehicles on the Public Lands, 37 FR 27 (1972); See also 2000 ROD, at 12; 2003 ROD at 18; 2004 EA at 11; 2007 ROD, at 28. Executive Order 11644 was amended by Executive Order 11989, Off Road Vehicles on Public Lands, 42 FR 101 (1978), which states:

[t]he respective agency head shall, whenever he determine that the use of off-road vehicles will cause or is causing considerable adverse effects on the soil, vegetation, wildlife, wildlife habitat or cultural or historic resources of particular areas or trails of the public lands, immediately close such areas or trails to the type of off-road vehicle causing such effects. (Executive Order 11989, 42 FR 101 (1978) (emphasis added); See also, 2007 ROD, at 29.)

**Corr. ID:** 1492

**Organization:** CNPSR et al

**Comment ID:** 128663

**Organization Type:** Unaffiliated Individual

**Representative Quote:** In its own statement of purpose and need, the prior administration established a "goal" that did not focus on providing appropriate opportunities to enjoy the scenery, wildlife, and natural environment unique to winter in Yellowstone. Rather, the goal was "provid[ing] park visitors with a range of appropriate winter recreational opportunities" within Yellowstone. (2007 FEIS at 4.) This "goal" disregarded the fact that "the 'enjoyment' referenced in the Organic Act is not enjoyment for its own sake, or even enjoyment of the parks generally, but rather the enjoyment of 'the scenery and natural and historic objects and the wild life' in the parks in a manner that will allow future generations to enjoy them as well." (Greater Yellowstone Coalition, 577 F. Supp. 2d at 193; see also Management Policies § 1.4.3 ("The enjoyment that is

contemplated by the statute ? includes enjoyment both by people who visit parks and by those who appreciate them from afar.".)

## VA2000 - Visitor Use and Experience: Methodology And Assumptions

Concern ID: 23883

**CONCERN STATEMENT:** Commenters requested that the analysis of visitor use and experience address recreational opportunities on nearby or adjacent federal lands.

**Representative Quote(s):** **Corr. ID:** 959 **Organization:** *Not Specified*

**Comment ID:** 127623 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Take into account existing snowmobile trails on Federal lands around the park. (USFS, BLM, etc).

**Corr. ID:** 1429 **Organization:** Maryland Ornithological Society

**Comment ID:** 129074 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Snowmobilers Can Go Elsewhere

Those who prefer snowmobiling have alternatives close at hand. Five national forests surround the national park, each with many miles of routes open to snowmobiles. The laws governing the national forests do not have the strict nonimpairment mandate of the National Park Service Organic Act, so snowmobiling does not present the same conflict as in the national parks. The Forest Service has already identified routes suitable for snowmobiles and has publicized these through its web sites and through maps available at ranger stations. We suggest including an appendix to the EIS listing all snowmobiling areas within a day's drive of Yellowstone, with information on the mileage open, whether the routes are groomed, any fees charged, and any restrictions on type of snowmobile (for comparison to the Yellowstone BAT standards).

**Corr. ID:** 1536 **Organization:** *Not Specified*

**Comment ID:** 129152 **Organization Type:** Unaffiliated Individual

**Representative Quote:** The environmental impact statement should list the routes open for snowmobiling in the national forests surrounding Yellowstone. Snowmobilers can spread out on those vast areas without having any impact on Yellowstone and its visitors who seek a quiet experience in wild nature.

**Corr. ID:** 1571 **Organization:** *Not Specified*

**Comment ID:** 129227 **Organization Type:** Unaffiliated Individual

**Representative Quote:** In the EIS we would like to see a thorough treatment of the opportunities for snowmobiling available outside Yellowstone, on the national forests and BLM public lands. How many miles of routes are open for snowmobiling in those publicly owned lands? How many miles are groomed? Are snowmobile rental businesses already serving these routes? Are these routes open to types of snowmobiles that are not allowed in Yellowstone?

The availability of other places to ride can be persuasive. In October 2009 the Forest Service closed 39 miles of offroad vehicle trails in the Tellico River watershed of the Nantahala National Forest (North Carolina). The Environmental Assessment for that project showed that 1,053 miles of ORV routes would remain open on other national forests and states lands within a day's drive of the Tellico site. An appendix listed them individually. (See Appendix B, "Details of Other OHV Opportunities," posted at: [http://www.cs.unca.edu/nfsnc/nepa/tusquitee/tellico/tellico\\_final\\_ea.pdf](http://www.cs.unca.edu/nfsnc/nepa/tusquitee/tellico/tellico_final_ea.pdf).) Like Yellowstone, the Tellico OHV trails attracted riders from a large region, in this case,

covering the Midwest, South and East. Since the closure, the controversy has subsided as offroaders learned to like the alternatives.

Within a day's drive of Yellowstone there must be hundreds or thousands of miles of routes open to snowmobiles, where snowmobiling can be done without any impact on the park, its wildlife, and its visitors. We would like to see these analyzed and listed in the EIS, either on a site-specific basis or by national forest and ranger district.

**Concern ID:** 23884

**CONCERN STATEMENT:** Some commenters noted that they felt the cost for visiting Yellowstone in the winter was prohibited, and would like to see that addressed in the plan/EIS analysis.

**Representative Quote(s):** **Corr. ID:** 370 **Organization:** Hebgen Lake Development, Inc.

**Comment ID:** 126653 **Organization Type:** Unaffiliated Individual

**Representative Quote:** I would hope that the EIS will properly address access concerns for visitors to the Park in Winter. The costs involved to visit the park under the existing temporary rule are prohibitive for a family of four.

**Corr. ID:** 1497 **Organization:** *Not Specified*

**Comment ID:** 128510 **Organization Type:** Unaffiliated Individual

**Representative Quote:** As a concessionaire, I would make more money if the roads were plowed and commercial vehicles were the transportation alternative because operating tracked vehicles is much more costly than wheeled vehicles. However, I am against that alternative for many reasons, some as discussed above. It is proposed by some that plowing the road and allowing commercial transport only will make the visit to Yellowstone more affordable to the general public. Not so. In past winters during low snow times, the road has been plowed and commercial wheeled vehicles allowed to operate. At those times tour prices to Old Faithful did drop but not significantly, hovering around the \$75 mark, about \$10 dollars lower than by snowcoach at that time. During these times due to the impracticality of plowing along the Gibbon River and at higher elevations to Canyon and elsewhere, the only road corridor plowed was between West Yellowstone and Old Faithful. This mimics the preferred alternative put forth in 1999. At that time it was proposed to have staging areas for over snow vehicles (OSV) at Madison Junction and at Old Faithful to provide access to other park areas. The logistics of this certainly can be overcome but will obviously be more costly. Ideally, commercial operators will need a storage and mechanical facility to care for and perform daily maintenance and repairs on their equipment at these staging areas. Alternatively we can trailer our equipment to and from these staging areas, a costly proposition. Either way, expenses skyrocket and will be passed on to the consumer. Add the logistics of transporting people to these staging areas and it soon becomes prohibitively expensive for the general public to visit the majority of Yellowstone.

**Concern ID:** 23885

**CONCERN STATEMENT:** Commenters asked that the guided requirement be evaluated, with some noting they felt the requirement for a guide impacted the visitor experience by bunching large groups together that create more noise and by taking away visitor flexibility.

One commenter noted the potential benefits of a guide, and if more vehicles were allowed, would like to see an analysis of requiring professional drivers.

**Representative Quote(s):** **Corr. ID:** 1494 **Organization:** CNPSR et al

**Comment ID:** 128553 **Organization Type:** Unaffiliated Individual

**Representative Quote:** As a component of the new analysis, we urge NPS to evaluate whether alternatives that reduce or eliminate interaction between visitors and guides can achieve these "visitor use" objectives as effectively as those that rely on professional drivers and guides. We believe this analysis is especially important given that the winter season often combines driving conditions that are more hazardous than those of Yellowstone's other seasons with wildlife stressed and depleted by the rigors of winter. In particular, if NPS considers alternatives that would allow greater numbers of vehicles, we encourage close evaluation of the benefits that professional drivers provide in the winter season to public safety, resource protection, and visitor experience.

**Corr. ID:** 1523

**Organization:** Wyoming Legislature

**Comment ID:** 128273

**Organization Type:** Unaffiliated Individual

**Representative Quote:** As I recall, the study about the guiding requirement did not provide substantial support for the continuation of the requirement. It bunched riders together into larger groups and created more noise. It also places a big financial hardship on winter visitors to YNP and makes it so only those that can afford a guide get to see it. This is wrong and contrary to NPS expressed desire to get more youth to experience YNP.

**Corr. ID:** 1524

**Organization:** *Not Specified*

**Comment ID:** 128265

**Organization Type:** Unaffiliated Individual

**Representative Quote:** VISITOR USE AND EXPERIENCE:

The guide requirement is detrimental to the visitor experience in several ways. It adds to the already high cost of visiting in winter, it is an awkward way to travel, and it causes jams of people when everyone leaves at about the same time (we stopped at Madison Jct along with at least 10 other guided groups...we wasted a lot of time waiting for everyone to use the restroom and get a snack).

My best memories of the park in winter were the years when our family went in unguided and we could choose our itinerary and stop and go as we wished. Surely there is a way to provide some training if needed and a park drivers license so visitors can go in on their own.

Our property manager tells me there used to be many visitors who came with their own machines to visit the park and they stayed several days...now they don't come at all. Also local people are not able to go into the park without a guide. One fellow told me they used to take their own machines into the park for the day and take their cross-country skis with them...sounds great to me. Now they would have to rent machines and pay a guide and it becomes cost prohibitive. Visitors need more flexible options to allow for a variety of activities.

Rest areas need to be expanded to accommodate the clumps of visitors who all arrive in short windows of time. We did not experience this problem when we traveled without a guide

**Concern ID:** 23887

**CONCERN STATEMENT:** Commenters requested that specific trend data/metrics be addressed in the plan/EIS including:

- an analysis of the geographic origin of park visitors
- an analysis of OSV numbers that includes guides in the count
- trends data on snowmobile use by snowshoers/skiers
- inclusion of trends that show snowcoach use increasing and snowmobile use decreasing
- inclusion of monitoring reports that show how many visitors pass through certain park areas

**Representative Quote(s):** **Corr. ID:** 119

**Organization:** Coalition of National Park Service Retirees

**Comment ID:** 127444      **Organization Type:** Unaffiliated Individual

**Representative Quote:** The plan should recognize the changing landscape in winter use in the park. Snowmobile use is slowly declining (snowmobile sales in the US have steeply declined) while snow coach visitation is increasing.

**Corr. ID:** 321      **Organization:** *Not Specified*

**Comment ID:** 126450      **Organization Type:** Unaffiliated Individual

**Representative Quote:** The EIS should display monitoring reports to indicate the number of winter visitors at or pass through Madison, Norris, Canyon, Fishing Bridge, South Thumb, and Old Faithful on oversnow vehicles. A winter use oversnow vehicle corridor map should be included that indicates travel time between points of access and destination. A calculation of grooming and administrative costs for each route segment and relation to number of winter visitors would be a useful objective tool when assessing need for visitor access beyond that to the Old Faithful Area from the West or South Entrances. Such calculations would help to define "opportunities for people to experience the park in winter, (but) access to most of the park in winter is limited by distance and the harsh winter environment, which present challenges to safety and park operations" as expressed in the "need" portion of the Winter Use Plan Notice.

**Corr. ID:** 372      **Organization:** *Not Specified*

**Comment ID:** 126662      **Organization Type:** Unaffiliated Individual

**Representative Quote:** 2. Include administrative use in motorized use #'s. The # of official snowmobiles and modified trucks used by the Park Service are just as impactful and organized groups.

**Corr. ID:** 957      **Organization:** *Not Specified*

**Comment ID:** 127615      **Organization Type:** Unaffiliated Individual

**Representative Quote:** - Include trend data on snowmobile use by snowshoers, skiers, etc.

- Also include data on snowmobile, skis/snowshoes trends

**Corr. ID:** 1494      **Organization:** CNPSR et al

**Comment ID:** 128556      **Organization Type:** Unaffiliated Individual

**Representative Quote:** H. Visitation Numbers

A statistical practice at Yellowstone that seems potentially integral to accurate evaluation of winter-use alternatives and trends, and perhaps also to accurate calculation of impacts, came to our attention during the last year in discussions with NPS staff. We include comment on this in case it may be helpful to the analysis and to request clarification if the following is not correct. NPS staff informed us that Yellowstone's visitation statistics count snowmobile guides as "snowmobile visitors" while, on the other hand, excluding snowcoach guides from the park's count of "snowcoach visitors." One implication of this would appear to be that the number of snowmobile visitors has actually been, for many years, 10 to 15 percent less than what the park officially reports (given the ratio of snowmobile guides to snowmobile visitors). We urge NPS to ensure that any such inconsistency in visitation data does not obscure meaningful differences between snowmobile and snowcoach alternatives. In addition, it seems that a system to better track the number of winter visitors entering the park on skis, snowshoes, or other non-motorized means would be a useful management tool for NPS.

**Corr. ID:** 1517      **Organization:** *Not Specified*

**Comment ID:** 128307      **Organization Type:** Unaffiliated Individual



**Representative Quote:** In addition, many of us are finding that change is highly beneficial -- not just necessary. I have explained in prior letters to the Park Service that I continue to rent snowmobiles. However, the significant growth in my winter business over the last seven years has been from more visitors choosing snowcoach tours. Many of the reasons for this trend are unrelated to the Park's rules -- as a result, we can expect the increasing demand for snowcoach tours to continue.

The influences range from changing demographics to changing snow conditions; from the much lower cost of snowcoach trips to the growing interest among our winter visitors in bringing skis and snowshoes, letting someone else do the driving as they enjoy and learn about Yellowstone, conversing easily with their friends, family and guide as they travel through the park, keeping warm in the Park's harsh cold, and, in some cases, bringing elderly and very young family members along. Snowcoach tours accommodate these changes.

**Corr. ID:** 1571

**Organization:** *Not Specified*

**Comment ID:** 129228

**Organization Type:** Unaffiliated Individual

**Representative Quote:** The EIS should analyze the geographic origins of people who ride snowmobiles in Yellowstone. A state-by-state analysis would be helpful. How many are repeat visitors, or their second, third, or fourth snowmobiling visit to Yellowstone?

**Concern ID:** 23888

**CONCERN STATEMENT:** Commenters provided suggestions for how visitor use should be modeled in the plan/EIS. Specifically, it was requested that a visitation curve be used, instead of assuming 100% use on every day of the winter use season.

**Representative Quote(s):** **Corr. ID:** 1483

**Organization:** American Council of Snowmobile Associations

**Comment ID:** 128686

**Organization Type:** Unaffiliated Individual

**Representative Quote:** OTHER SPECIFIC ISSUES, CONCERNS, AND SUGGESTIONS TO CONSIDER AS THE FULL RANGE OF ALTERNATIVES IS DEVELOPED

**Modeling:** It appears that modeling potential impacts based upon maximum visitation levels every day of the winter season should be revisited. This approach results in overstated impacts.

It would seem more appropriate to use trends from actual winter visitation statistics which show there are clear patterns of peaks and valleys when visitation is typically high and when it is low. Historic visitation data from the past several years should be analyzed and used to develop a 'visitation curve' which would more accurately reflect potential future visitation trends versus continuing to erroneously model based upon an assumption of 100% use every day.

We suggest that all alternatives developed for this process utilize a visitation curve based upon vehicle types and actual use patterns rather than continuing to use the '100% use' assumption. It appears the data from 2004 through 2010 would reflect the most accurate visitation trends for snowmobiles if the alternative continues to require BAT snowmobiles. However, if any alternative considers allowing non-BAT snowmobiles, it may be appropriate to consider perhaps ten years of visitation data to develop an accurate visitation curve.

**Corr. ID:** 1516

**Organization:** Oregon State Snowmobile Association

**Comment ID:** 128346

**Organization Type:** Unaffiliated Individual

**Representative Quote:** We suggest that all alternatives developed for this process utilize a visitation curve based upon vehicle types and actual use patterns rather than continuing to use the '100% use' assumption. We believe 2004 through 2010 data will mostly likely reflect the most accurate visitation trends for snowmobiles if the alternative continues to require BAT snowmobiles. However, if any alternative considers allowing non-BAT snowmobiles, it may be appropriate to consider perhaps ten years of visitation data to develop an accurate visitation curve.

**Corr. ID:** 1559                      **Organization:** Wyoming State Snowmobile Association

**Comment ID:** 129344              **Organization Type:** Recreational Groups

**Representative Quote:** Modeling: Past planning process were in error when they modeled potential impacts based upon potential maximum visitation levels every day of the winter season (an assumption of 100% use every day of the season). This approach resulted in overstated impacts which ultimately led to improperly reduced daily use limits.

A better approach would be to use trends from actual winter visitation statistics which show there are clear patterns of peaks and valley when visitation is typically high and when it is low. Historic visitation data from the past several years should be analyzed and used to develop a "visitation curve" which would more accurately reflect potential future visitation trends versus continuing to erroneously model based upon an assumption of 100% use every day. Such a curve would show that use is typically low at park opening, spikes over Christmas to New Years, drops off from early to mid-January, typically increases through February with a spike around President's Day weekend, and then drops off through park closing in early March.

Using snowmobiles as an example and comparing actual snowmobile entries from the NPS stats website which offered 2009 and 2010 Yellowstone visitation from December through February (December 15 park opening through February 28 = 76 days) against potential snowmobiles (100% use assumption), Table 1 below shows how flawed this modeling methodology actually is: the 2010 season saw 60.9% of possible snowmobile entries actually utilized from December through February, while in 2009 only 27.4% of possible entries were utilized, Clearly, the '100% assumption' overstates true potential impacts.

Table 1: Comparison of Possible to Actual Snowmobile Entries (Dec.-Feb.)

Season	Daily Cap	Possible	Actual	Daily Avg	% Possible of Entries
2009-10	318	24,168	14,708	193.5	60.9%
10-11	720	54,720	14,995	197.3	27.4%

We suggest that all alternatives developed for this process utilize a visitation curve based upon vehicle types and actual use patterns rather than continuing to use the '100% use' assumption. We believe 2004 through 2010 data will most likely reflect the most accurate visitation trends for snowmobiles if the alternative continues to require BAT snowmobiles. However, if any alternative considers allowing non-BAT snowmobiles, it may be appropriate to consider perhaps ten years of visitation data to develop an accurate visitation curve.

**Concern ID:** 23889

**CONCERN STATEMENT:** One commenter requested that the NPS consider statistics showing that a snowcoach only option is not viable for park visitors, with others requesting that the visitor use and experience analysis include a wider range of options for visitors.

**Representative Quote(s):**      **Corr. ID:** 1585                      **Organization:** Office of the Governor, State of Wyoming

**Comment ID:** 129600      **Organization Type:** State Government

**Representative Quote:** I also feel strongly that there should be a wide range of winter access options in Yellowstone. While there may be some visitors who would prefer to ride inside a snowcoach, there are others who would rather experience the sights riding on a snowmobile. This is no different than the access preferences of summer visitors - there are visitors who prefer to take a bus and there are visitors who prefer to experience the park on a motorcycle. This EIS should ensure a variety of access options to accommodate users' preferences.

**Corr. ID:** 1588      **Organization:** State of Wyoming- Department of State Parks and Cultural Resources

**Comment ID:** 129645      **Organization Type:** State Government

**Representative Quote:** Cumulatively, these statistics show there is absolutely no way snow coaches alone can deliver a sufficient level of park visitation that is at the level that : A) the park needs to sustain its public support and operating costs, B) the public needs to meet its desired level of visitation to the parks and desired range of experiences, and C) can sustain the park's infrastructure and resource management requirements.

**Concern ID:** 23890

**CONCERN STATEMENT:** Commenters requested that the analysis of visitor use and experience take into consideration the uncertainty of past winter use management, and how that may have impacted past and future OSV use numbers.

**Representative Quote(s):** **Corr. ID:** 1517      **Organization:** Not Specified

**Comment ID:** 128312      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Reliable Access:  
We just ended the 2009-2010 winter season with rubber-tracked snowcoaches providing continued access to Old Faithful when snowmobiles could not. This was due to thin, patchy snow on park roads. The 2009-2010 season nearly started this way as well. At both ends of the season, poor snow conditions that inhibit snowmobile access are becoming the norm, not the exception. I hope that the Park Service will consider, as part of this long-term plan how, if it is going to continue snowmobile access, it can avoid what is, in effect, the worst possible marketing of Yellowstone's winter season, which is to approach each winter with news stories throughout the region and sometime across the country that focus on whether Yellowstone will be able to open to snowmobiles, rather than the certainty that it will open to snowcoaches.

**Corr. ID:** 1572      **Organization:** Citizens for Balanced Use

**Comment ID:** 129358      **Organization Type:** Civic Groups

**Representative Quote:** Your new plan assumes that the last year numbers are the norm when in fact they are a number which was achieved by the lack predictability as to whether the Park would in fact be open. A better representation would be to use numbers of visitors prior to the uncertainty created by the environmental groups and their litigation over the last several years. The Park Service should evaluate historic numbers based on the growth years of snowmobile numbers prior to any litigation from environmental groups. Winter visitor numbers used after litigation from environmental groups only illustrates what has occurred as result of litigation and not what would have most likely occurred if litigation were not part of the equation.

**Corr. ID:** 1589      **Organization:** Montana Fish, Wildlife, and Parks

**Comment ID:** 129847      **Organization Type:** State Government

**Representative Quote:** Please incorporate into any analysis the impacts that inconsistent direction and regulatory uncertainty are having on potential visitors to the park and the tourism industry. Changing limits, ongoing challenges and a lack of clear opportunities to visit causes uncertainty in visitor trip planning and has an associated impact on tourism because they cannot consistently market and communicate opportunities. Uncertainty associated with resolving this issue is having a clear fiscal impact on surrounding communities.

**Concern ID:** 23891

**CONCERN STATEMENT:** Commenters requested that the plan/EIS consider a carrying capacity for winter use.

**Representative Quote(s):** **Corr. ID:** 280 **Organization:** CUFF

**Comment ID:** 127931 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Which park resources should guide development of the winter plan?

A. The important factors that should guide development of the plan are 1) The sustainable carrying capacity of snowmobiles and snow coaches in YNP without damaging long-term scenic quality and wildlife in the park, and 2) the demand (use) for snowmobiles and snow coaches in the park.

**Corr. ID:** 280 **Organization:** CUFF

**Comment ID:** 127932 **Organization Type:** Unaffiliated Individual

**Representative Quote:** The carrying capacity for snowmobile use should be based on its affect on visual quality, wildlife and its habitat (primarily elk and bison), the sound scape, air quality and the social and economic effects on the local communities around the park. To the degree that snowmobiles may have a negative affect on these factors the number of snowmobiles may need to be reduced to mitigate that affect. That reduction needs to be based on science however, not politics or agenda. We need to know what those significant factors are and how they affect use.

#### **VA4000 - Visitor Use and Experience: Impact of Proposal And Alternatives**

**Concern ID:** 23892

**CONCERN STATEMENT:** Commenters noted that the plan/EIS should consider access for those visitors with disabilities, and the role OSV play in this access.

**Representative Quote(s):** **Corr. ID:** 1656 **Organization:** Board of County Commissioners for Park County, Wyoming

**Comment ID:** 129961 **Organization Type:** State Government

**Representative Quote:** In providing opportunities that are universally accessible, the Park Service should keep in mind its commitment to disabled persons: "A primary principle of accessibility is that, to the highest degree practicable, people with disabilities are able to participate in the same programs, activities and employment opportunities available to everyone else" (National Park Service 2010). Correspondingly, the Americans with Disabilities Act states, "No qualified individual with a disability shall, by reason of such disability be excluded from participation in or be denied the benefits of services, programs, or activities of a public entity, or be subjected to discrimination by any such entity" (The Americans with Disabilities Act of 1990). Snowmobiling is a great recreational activity for many people with disabilities, as a snowmobile's features are similar to a wheelchair's in terms of seat height and hand controls. Limiting snowmobile use in YNP prohibits many people with disabilities from experiencing a recreational activity they enjoy and may prevent

them from experiencing YNP in the winter, a beautiful natural resource. As the Americans with Disabilities Act states, no individual with a disability should be excluded from services provided by our public entities, including recreation. Winter access to YNP is not likely to be available to disabled persons without the use of a snowcoach or snowmobile. In the planned EIS, evaluate Park accessibility for disabled persons under each alternative.

**Concern ID:** 23893

**CONCERN STATEMENT:** Commenters noted that they believe OSV use would impact the park's flora, fauna, water resources, and air quality and that reduction in OSV use would limit these impacts and increase the visitor experience.

**Representative Quote(s):** **Corr. ID:** 434 **Organization:** Winter Wildlands

**Comment ID:** 128634 **Organization Type:** Unaffiliated Individual

**Representative Quote:** As an observer from an equally beautiful mountainous state (Washington) many of us will be so impressed and proud of the National Park Service if they make a permanent commitment to preserving and improving the current and future ecological well-being of Yellowstone. It's so heartening to know that not only are you safeguarding the flora and fauna for years to come, but also that us visitors will experience Yellowstone as it was intended: quiet, clean, and undisturbed.

**Corr. ID:** 1423 **Organization:** Rock the Earth

**Comment ID:** 128853 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Many visitors use the Parks during the winter season, and while visitors have a range of winter recreation opportunities, ranging from primitive to developed, it is the NPS' obligation to ensure that such recreational experiences are offered in an appropriate setting--that such experiences do not take place where they will irreparably impact air quality, wildlife, cultural areas or the experiences of other parks' visitors, or other parks' values and resources. By all accounts snowmobile use in current numbers is in conflict with the use of the parks' facilities by other user groups. For trails open to both motorized and non-motorized users, non-motorized users express dissatisfaction with the sound, odor, and quantity of snowmobiles. These vehicles affect the solitude, quiet, clean air, and other resource values that many people expect and wish to enjoy in national parks. Parks have documented health hazards from snowmachine emissions, harassment and unintended impacts on wildlife from groomed trails and their use, degradation of air-quality-related values and impacts on the natural soundscape. RtE members join many others in strongly objecting to the degradation of the parks' inherent values, as well as how these impacts affect people and their recreational opportunities.

**Corr. ID:** 1423 **Organization:** Rock the Earth

**Comment ID:** 128854 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Under a policy prohibiting snowmobiles in the Parks, opportunities to view wildlife and scenery would not be reduced for the Parks. Furthermore, there would be a major beneficial effect on visitors' ability to experience natural quiet and solitude with the implementation of such a policy. In addition, there would be a major reduction in vehicle emissions that would provide a major beneficial improvement in opportunities to experience clean air in all three Parks.

**Corr. ID:** 1423 **Organization:** Rock the Earth

**Comment ID:** 128860 **Organization Type:** Unaffiliated Individual

**Representative Quote:** The current policy provides for continued snowmobile access to the Parks. It also places "Best Available Technology" restrictions on all recreational snowmobile use in the Parks. Even so, when compared with the 2000 ROD, continued use of snowmobiles in the Parks will still lead to diminished visitor experiences, diminished quiet and solitude to

many visitors, and decreased opportunities to experience clean air, especially on peak days. The continued presence of snowmobiles will result in continuing negative impacts to air quality and adversely impacting the natural soundscapes of the Parks, so as to undercut the majority of visitors' overall experience and thus failing to remove the impairment to park resources in the shortest possible time. For these reasons, the NPS should eliminate snowmobile access to the Parks.

**Concern ID:** 23895

**CONCERN STATEMENT:** Commenters noted that past planning efforts have resulted in an decrease of park visitation, with some feeling that no snowmobile use would cut off visitation from the park in the winter.

**Representative Quote(s):** **Corr. ID:** 125 **Organization:** *Not Specified*

**Comment ID:** 127532 **Organization Type:** Unaffiliated Individual

**Representative Quote:** If you do away with the use of motorized snow coaches, then you're effectively cutting the public off of most of Yellowstone National Park in the Winter.

**Corr. ID:** 1588 **Organization:** State of Wyoming- Department of State Parks and Cultural Resources

**Comment ID:** 129643 **Organization Type:** State Government

**Representative Quote:** Three years into the Temporary Plan the park was still down nearly 47,000 visitors, so it seems that something needs to be changed - if there is hope of getting any substantive numbers of those past visitors back. Some individuals and interest groups will continue to say these visitors will/should come from snowcoach riders. But when one looks at the facts that seems extremely unlikely and quite frankly, would come with extreme consequences to the park's infrastructure and particularly the groomed roadways.

**Concern ID:** 23897

**CONCERN STATEMENT:** One commenter suggested that visitor use could be increased through programs that allot money to certain groups so they can visit the park.

**Representative Quote(s):** **Corr. ID:** 896 **Organization:** *Not Specified*

**Comment ID:** 126275 **Organization Type:** Unaffiliated Individual

**Representative Quote:** I read your October 15, 2009 letter. It was very informational but no where did you address the impact on the visitors. I would like to see this added onto the Winter Plan or a special committee to do a study on how more American citizens can visit and enjoy the National Parks. Maybe some of that Federal stimulus funds can be allotted to the Park Service for entry fees for certain groups. I notice your list of projects under consideration. Are any of these projects funded by the stimulus money? I will fire off a letter to the President. I would appreciate if you will answer this letter. Thank you.

### **WH1000 - Wildlife And Wildlife Habitat: Guiding Policies, Regs And Laws**

**Concern ID:** 23898

**CONCERN STATEMENT:** Commenters noted what they believed what NPS responsibility to protect wildlife under the Organic Act, Executive Orders, and NPS Management Policies.

**Representative Quote(s):** **Corr. ID:** 1423 **Organization:** Rock the Earth

**Comment ID:** 128871 **Organization Type:** Unaffiliated Individual

**Representative Quote:** VI. The Negative Impact that Snowmobiles Have on Wildlife Warrants the Prohibition of Snowmobiles in the Parks

Wildlife and wildlife habitats are highly valued park resources and are addressed as such in the Organic Act. All policy statements regarding the conservation of park resources and values therefore apply to wildlife. Avoidance of unacceptable impacts (NPS 2006: 1.4.7.1) is notable in this regard, as it applies to all park resources and values. Park managers must not allow uses that would cause unacceptable impacts: i.e., those which would impede the attainment of desired conditions for natural resources, or diminish opportunities for current or future generations to enjoy and be inspired by those resources. 2008 EA, at 3-1. In addition to the protections offered by the Organic Act and Yellowstone Enabling Act, wildlife is also specifically protected by NPS's snowmobile regulation. See 36 C.F.R. 2.18(c) (Snowmobiles are prohibited "except where designated and only when their use is consistent with the park's natural, cultural, scenic and aesthetic values, safety considerations, and park management objectives, and will not disturb wildlife or damage park resources.").

**Corr. ID:** 1494

**Organization:** CNPSR et al

**Comment ID:** 128522

**Organization Type:** Unaffiliated Individual

**Representative Quote:** Yellowstone National Park provides essential harbor to a number of iconic and imperiled species. Each winter, the wildlife that gathers across Yellowstone's landscape includes wolves, wolverines, lynx, bald eagles, trumpeter swans, and the largest remaining genetically pure bison herd in the country. The potential impacts of the available winter-use alternatives on the park's animals should be given thorough consideration in the agency's environmental analysis--consideration that emphasizes, again, "accurate fidelity to the law" and the "best available sound science." (Scoping News Release.)

First, NPS must assess all considered alternatives in the light of governing legal mandates. For example, National Park Service regulations prohibit the authorization of snowmobile use except "when their use ? will not disturb wildlife or damage park resources." (36 C.F.R. § 2.18(c).) Executive Order 11,644 similarly requires NPS to "minimize harassment of wildlife or significant disruption of wildlife habitats" in designating areas for off-road vehicle use. All told, as NPS recognized in 2003, "park policies, regulations, and EOs clearly state that disturbance to wildlife, regardless of population-level effects, is unacceptable in the national parks." (2003 SEIS at 206.) Accordingly, an analysis again focused on population-level wildlife impacts would only be vulnerable to legal challenge. (See Greater Yellowstone Coalition, 577 F. Supp. 2d at 202-05.)

## **WH2000 - Wildlife And Wildlife Habitat: Methodology And Assumptions**

**Concern ID:**

23899

**CONCERN STATEMENT:** Commenters stated that non-motorized uses could have a greater impact than snowmobiles, and felt this should be considered in the plan/EIS.

**Representative Quote(s):**

**Corr. ID:** 24

**Organization:** Not Specified

**Comment ID:** 127745

**Organization Type:** Unaffiliated Individual

**Representative Quote:** Animal flight response studies show more reaction from cross country skiers and snowshoe hikers than from passing snowmobiles.

**Corr. ID:** 1449

**Organization:** Not Specified

**Comment ID:** 129044

**Organization Type:** Unaffiliated Individual

**Representative Quote:** \*Parker et al. (1984) suggested that greater flight distances occur in response to skiers or individuals on foot compared to snowmobiles and that unanticipated disturbance may have a more detrimental effect. Freddy et al. (1986) and

Freddy (1986) also reported that responses by mule deer to persons afoot, when compared to snowmobiles, were longer in duration, more often involved running, and required greater energy expenditures.

References:

\*Sime, C. A. 1999. Domestic Dogs in Wildlife Habitats. Pages 8.1-8.17 in G. Joslin and H. Youmans, coordinators. Effects of recreation on Rocky Mountain wildlife: A Review for Montana. Committee on Effects of Recreation on Wildlife, Montana Chapter of The Wildlife Society. 307pp.

\*Parker, K. L., C. T. Robbins, and T. A. Hanley. 1984 Energy expenditures for locomotion by mule deer and elk. Journal of Wildlife Management 48(2):474-488

\*Freddy, D. J. 1986. Responses of adult mule deer to human harassment during winter. R. D. Comer, T. G. Baumann, P. Davis, J. W. Monarch, J. Todd, S. VanGytenbeek, D. Wills, J. Woodling, editors. Proceedings II. Issues and technology in the management of impacted western wildlife: proceedings of a national symposium; February 4-6, 1985. Glenwood Springs, Colorado. Boulder, Colorado: Thorne Ecological Institute.

\*Freddy, D. J. W.M. Bronaugh, and M. C. Fowler. 1986. Responses of mule deer to disturbance by persons afoot and snowmobiles. Wildlife Society Bulletin 14(1):63-68.

**Corr. ID:** 1449

**Organization:** *Not Specified*

**Comment ID:** 129046

**Organization Type:** Unaffiliated Individual

**Representative Quote:** Also while attending the Society for Ecological Restoration Symposium Northwest, February 2010? There were presentations where results of recent studies showed increased predation, altered behavioral response due to and nearby manmade foot and bicycle trail systems where less behavioral anomalies were observed near motor vehicle roads. For those of us who consciously observe wildlife during many situations know this to be true. Shouldn't Best Available Science concentrate on predominate detrimental impact?

**Corr. ID:** 1572

**Organization:** Citizens for Balanced Use

**Comment ID:** 129361

**Organization Type:** Civic Groups

**Representative Quote:** Another part of the scoping document that has been under attack by litigation from environmental groups is the affect of snowmobiles on wildlife. The issue of wildlife disturbance by snowmobiles has been one of the main reasons for groups like the GYC to oppose snowmobiles in the Park. The fact is that heart monitors were placed on elk in the Park and flight distances and heart rates were recorded when elk were approached by snowmobiles and cross-country skiers. The results of the survey clearly revealed that cross-country skiers were much more disturbing to elk than snowmobiles. Flight distances and heart rates were much lower when elk were approached by snowmobiles versus cross-country skiers. This study is valid yet your agency makes no attempt to limit cross-country skiers from areas that have elk present.

**Concern ID:** 23900

**CONCERN STATEMENT:** Commenters stated that the plan/EIS should consider and use data showing that OSV use does not disturb wildlife in the park.

**Representative Quote(s):** **Corr. ID:** 1058

**Organization:** *Not Specified*

**Comment ID:** 126317

**Organization Type:** Unaffiliated Individual

**Representative Quote:** As the Park Service has studied the impact on the animals, THERE ISNT REALLY ANY! 90% "look and turn". Of course that is when we see wildlife in the park. Seems that has been not alot lately as well.

**Corr. ID:** 1061

**Organization:** *Not Specified*



**Comment ID:** 126314      **Organization Type:** Unaffiliated Individual

**Representative Quote:** "Extensive studies of the behavioral responses of five species (bison, elk, bald eagle, trumpeter swans and coyotes) to over snow traffic showed that these animals rarely showed high-intensity responses (movement, defense postures, or flight) to approaching vehicles. For individual animals, 8 to 10 percent of elk and bison show a movement response to snowmobiles and snowcoaches. Approximately 90 percent of elk or bison either show no apparent response or a "look and resume" response.

This level of reaction was consistent for a wide range of daily average oversnow vehicle use (ranging from 156 to 593 vehicles per day). Thirty-five years of census data do not reveal any relationship between changing winter use patterns and elk or bison population dynamics. No wildlife populations are currently declining due to winter use (swan populations are declining, but this decline is being experienced regionally and due to factors unrelated to winter use in the park or region)

**Corr. ID:** 1541      **Organization:** *Not Specified*

**Comment ID:** 129147      **Organization Type:** Unaffiliated Individual

**Representative Quote:** 6. Concerns regarding the historical disregard and abuse of winter wildlife have been admirably addressed by the dedicated guide system during the last 7 years of Winter Use policy. In fact, it can be argued that the guides have become a functional arm of the Park's Division of Interpretation. This can be confirmed with hard data from your own research. Finally, it's not unreasonable to say that summer should be as well behaved and as respectful as winter visitation is under the current guide system.

**Corr. ID:** 1578      **Organization:** *Not Specified*

**Comment ID:** 129882      **Organization Type:** Unaffiliated Individual

**Representative Quote:** Wildlife: The Park's own bison study (Gates, Stelfox) found no significant impacts on migration patterns from plowing or grooming. The Park also has adequate experience in the Northern Range on the effect of plowing on elk or bison, and the interaction of personal vehicles and commercial tours with wildlife. There is nothing in any current Park studies to suggest that plowing has been any problem in the Northern Range. The Northern Range has the greatest concentration of elk and bison in the park.

**Concern ID:** 23902

**CONCERN STATEMENT:** Commenters requested that the plan/EIS evaluate the impacts of snowpacking/road grooming on the park's wildlife. It was stated that this was a deficiency of past planning efforts and data to be considered for this effort was suggested.

**Representative Quote(s):** **Corr. ID:** 1566      **Organization:** Animal Welfare Institute

**Comment ID:** 129268      **Organization Type:** Conservation/Preservation

**Representative Quote:** Consistent with this suggestion of providing a fresh look at all relevant environmental impacts inherent to winter use management starting from a clean slate, AWI is most concerned about three broad impacts: snowmobile/snowcoach use; road packing or grooming; and natural soundscapes. AWI recognizes that other interest groups may believe that public safety, NPS employee health and safety, and economics are substantive issues that warrant consideration. The NPS has traditionally provided analysis of these issues though AWI believes that the significance of these impacts do not rise to the level of the other issues identified above.

**Corr. ID:** 1566      **Organization:** Animal Welfare Institute

**Comment ID:** 129277      **Organization Type:** Conservation/Preservation

**Representative Quote:** AWI carefully reviewed each of these studies, with the exception of the 2008 and 2009 behavioral analyses, and identified deficiencies in the study methodologies, designs, and even the conclusions of them in its November 16, 2007 comments on the NPS Final Environmental Impact Statement on Winter Use Management in Yellowstone National Park.<sup>1</sup> A review of the 2008 and 2009 studies while preparing this scoping comment letter revealed that they have the same deficiencies as contained in the earlier studies relying on the same methodologies. The deficiencies identified in the existing studies remain as valid today as they were when first brought to the attention of the NPS and, to date, have not been addressed. The NPS is not obligated to provide a point by point response to the questions/concerns/deficiencies identified but it also cannot ignore that there remains significant question about the ecological impacts of the packed/groomed snow roads on bison, other wildlife, and overall park ecology and that this issue must again be subject to serious discussion and analysis in the EIS.

**Corr. ID:** 1566

**Organization:** Animal Welfare Institute

**Comment ID:** 129281

**Organization Type:** Conservation/Preservation

**Representative Quote:** Finally, in regard to impacts on bison, while the NPS has separately developed its bison and winter use management strategies over time, there is considerable overlap between these two plans since winter use management and, particularly, the packing/grooming of snow roads can significantly influence bison movements, distribution, and habitat use patterns contributing to the number and rate of bison emigrating beyond park borders into Montana. As a consequence, short and long-term bison management must be considered as a component of winter use management in the EIS. In other words, instead of largely limiting the winter use management plan and EIS to questions about whether snowmobiles or snowcoaches should be allowed access to YNP, how the machines affect air quality, what the impact is to natural soundscapes, the NPS must also consider how winter use management influences bison and their management both within and outside the park.

**Corr. ID:** 1566

**Organization:** Animal Welfare Institute

**Comment ID:** 129276

**Organization Type:** Conservation/Preservation

**Representative Quote:** Any fresh look at the environmental impacts of winter use management requires a new, objective analysis of the impacts of snow road packing/grooming on park ecology and, specifically, on bison, elk, and other park wildlife. Though the impacts of road packing/groomed was a primary issue in the original lawsuit filed by The Fund for Animals that initiated this nearly 15 year long planning process, the NPS entirely ignored the issue in its initial efforts to prepare a winter use management plan and NEPA compliance document. Though the court ultimately ruled that this was illegal, the NPS had used the time to initiate a series of studies, some of which continue to this day, the results from which it has used to downplay the impact of the packed/groomed roads on bison, other species, and overall park ecology. The studies conducted included behavioral analyses examining how bison, elk, eagles, swans and other wildlife respond to oversnow motorized vehicles, how those operating said vehicles behave around wildlife, experiments examining how bison use the winter landscape, and an overarching study conducted by Gates et al. that was intended to address the question of how or if the existence of packed/groomed snow roads may have affected wildlife distribution, movements, and habitat use patterns in YNP. The behavioral analyses have continued with the NPS continuing those studies during both the 2008 and 2009 winter use seasons. In addition, the NPS in collaboration with Montana State University has implemented a more specific study along the Madison Junction to Norris road segment to ostensibly continue the effort to understand the ecology of bison and how it may be influenced by the availability of a packed/groomed and energy efficient travel route along the one road segment in YNP that Gates et al. identified as being a concern.

**Corr. ID:** 1566

**Organization:** Animal Welfare Institute

**Comment ID:** 129279

**Organization Type:** Conservation/Preservation

**Representative Quote:** As indicated in the 2007 comment letter (attached), Gates et al. failed to consider some important factors in their analysis. Those factors included bioenergetics, bison social and foraging behavior, the ability of bison to learn of alternative wintering destinations, how the unique geothermal conditions in YNP influence bison ecology, and how packed/groomed roads have influenced bison ecology over time. There is no need to revisit those issues here since they are adequately addressed in the attachment though it must be noted that none of these deficiencies, including the bioenergetic issue which is of particular relevance given the harsh winter conditions typical of YNP, have been subject to credible, if any, analysis in any of the previous EISs. Simply put, while AWI does not question that bison can and do create their own travel paths/corridors and that they do use stream bottoms to traverse portions of the Yellowstone landscape, there is an energetic consequence to bison movements, particularly in the winter when many animals, including bison, live on the energetic edge of survival or death. As a consequence, with the availability of a packed/groomed road system, bison (and other wildlife) have the opportunity to use that system as a travel corridor and, by doing so, they can save energy that could not have been saved if such a system did not exist. This may correspond to survival versus death or the ability to carry a fetus to term versus abortion or fetal absorption. The impact of bison use of the packed/groomed road surface in regard to the bioenergetics of individual animals is just one of a myriad indirect impacts of the packed/groomed road system that needs to be seriously reexamined in the EIS.

**Corr. ID:** 1566

**Organization:** Animal Welfare Institute

**Comment ID:** 129280

**Organization Type:** Conservation/Preservation

**Representative Quote:** Such a reexamination must be comprehensive and include any new data obtained from ongoing experiments on bison use of the packed/groomed road system, including the Madison Junction to Norris experiment, as well as providing a critical analysis of the issues identified as deficiencies in the previous studies. Furthermore, the NPS should collaborate with Dr. Meagher and others (e.g., Dr. Mark Taper) who have published studies and/or have data/evidence that may challenge the conclusions drawn by Gates et al. and others as to the impacts of bison use of packed/groomed roads. Similarly, it should provide an exhaustive review of the bioenergetics literature, including any studies examining the bioenergetics of bison or bison-like animals, in a winter environment in the EIS in order to understand how the existence of a packed/groomed road system may be affecting, adversely and beneficially, bison and other wildlife.

**Concern ID:** 23903

**CONCERN STATEMENT:** Commenters suggested specific areas they would like to see analyzed in the plan/EIS including:

- no assumptions that habituation equals no disturbance
- is there a tipping point for disturbance
- how does vehicle use influence animal movement/avoidance

**Representative Quote(s):** **Corr. ID:** 1428

**Organization:** Jackson Hole Conservation Alliance

**Comment ID:** 129026

**Organization Type:** Unaffiliated Individual

**Representative Quote:** To ensure that wildlife is protected, an environmental impact statement should include thorough review of the following:

- Is there a level of visitor access in winter that is a "tipping point" for wildlife? Is there a maximum number of people on the landscape that is detrimental to wildlife in this

stressful period of the year?

- Look at the presence of motorized vehicles (snowmobiles and snow coaches) on air quality, animal movement, and animal dislocation and avoidance. The number of motorized vehicles should be kept at a minimum or phased out.

- Recent research correlates noise to impacts on wildlife fertility, reproductive success and other factors. This should be looked at in great detail as noise continues to be a significant impact.

**Corr. ID:** 1494

**Organization:** CNPSR et al

**Comment ID:** 128527

**Organization Type:** Unaffiliated Individual

**Representative Quote:** Second, NPS's wildlife assessment should accurately reflect the recommendations and conclusions of the "best available sound" biological studies. In particular, the National Park Service should evaluate available alternatives in light of the documented relationship between vehicle numbers and adverse wildlife impacts (2003 SEIS at 197; White et al., 2006, at 1), the fact that "habituation does not imply the cessation of impacts!" (AR 125262), and the evidence of habitat avoidance associated with noise (Barber and Fristrup, Park Science, Vol. 26, No. 3, at 23).

As the prior administration's failure to engage in such an analysis resulted in the invalidation of its ultimate decision (Greater Yellowstone Coalition, 577 F. Supp. 2d at 202-05), the success of the present planning process depends upon a reasoned scientific assessment of the considered alternatives.

#### ***WH4000 - Wildlife And Wildlife Habitat: Impact Of Proposal And Alternatives***

**Concern ID:** 23901

**CONCERN STATEMENT:**

The Wyoming Game and Fish Department noted that they did not feel there were terrestrial or aquatic concerns related to the Winter Use Plan.

**Representative Quote(s):** **Corr. ID:** 1459

**Organization:** Wyoming Game and fish Department

**Comment ID:** 128700

**Organization Type:** Unaffiliated Individual

**Representative Quote:** Dear Mr. Sacklin:

The staff of the Wyoming Game and Fish Department has reviewed the environmental impact statement for the Winter Use Plan, Yellowstone National Park. We have no terrestrial wildlife or aquatic concerns pertaining to the Yellowstone National Park Winter Use Plan.

**Concern ID:** 23905

**CONCERN STATEMENT:**

Commenters noted that current winter use would impact wildlife less than unrestricted wheeled vehicle use.

**Representative Quote(s):** **Corr. ID:** 1305

**Organization:** Not Specified

**Comment ID:** 128614

**Organization Type:** Unaffiliated Individual

**Representative Quote:** and (3) I don't believe it would have any bigger impact on the wildlife of the park than is already there. Thank you for your consideration .....

