DIRK KEMPTHORNE
GOVERNOR

December 15, 1999

Clifford Hawkes
Winter Use Plan
National Park Service
12795 West Alameda Parkway
Lakewood, CO 80228

Dear Mr. Hawkes:

Thank you for the opportunity to comment on the *Draft Winter Use Plan and Environmental Impact Statement (EIS) for Yellowstone and Grand Teton National Parks and John D. Rockefeller, Jr., Memorial Parkway*. Our comments are divided into two categories, process and specific issue.

Process

While Idaho appreciates the opportunity to be one of the cooperating agencies that is providing input to the draft EIS, this process has been frustrating at times. It is our general consensus that many of our objections and suggestions have been either neglected or ignored. We have been left with the impression that our involvement was tolerated by the National Park Service, rather than supported. On several occasions throughout the process, the Park Service has chosen to disregard the Memorandum of Agreement with the cooperating agencies in terms of sharing information and the time allowed for review of information. If the issues that have led to our frustration are addressed, we believe that similar processes can prove more productive in the future.

We have recently received and reviewed a copy of the Park Service's Tourism Policy, Director's Order #17, in which policy 4.16 states; "It is the National Park Service policy to establish a common understanding on what is needed to ensure adequate protection of those resources for present and future enjoyment and how this can contribute to sustainable park related businesses and economies". Upon review, it is obvious that there has been no "common understanding" established. With the selection of Alternative B, as the preferred alternative, it is clear that the National Park Service is in violation of its own policy.

Specific Issues

We are disappointed that the National Park Service selected Alternative B as the preferred alternative for the plan. Alternative B causes several significant environmental, social, and economic problems that the draft EIS fails to address.

Visitor Use and Access

Preferred Alternative B proposes to plow the road from West Yellowstone to Madison Junction and from Madison Junction to Old Faithful. This action would displace 70.8% of the snowmobile traffic in Yellowstone National Park. Alternative B's proposed action of plowing the road without any parallel trail for snowmobile use was supported by only 4.2% of respondents in your most recent winter survey. Ignoring the results of this survey,

by selecting Alternative B as the preferred alternative, shows that the Park Service is interested more in serving its own desires, rather than the needs of park visitors.

The December 1999 issue of SnoWest Magazine, the West's leading publication on snowmobiling, rates West Yellowstone as the West's best. "...it's pretty hard to ride in the West and not be near a mountain range or two. But only one place has Yellowstone National Park in its backyard. This is one of the primary reasons West Yellowstone can make its claim of Snowmobile Capitol of the World." By eliminating snowmobile access at West Yellowstone, Alternative B removes the very reason West Yellowstone is the Snowmobile Capitol of the World.

The winter survey shows that plowing the road is a very unpopular action with winter visitors. Plowing will either displace snowmobilers to the North, South or East Entrances, or snowmobile visitors will decide not to visit Yellowstone. The EIS failed to analyze the impacts of displacing 70.8% of snowmobile visitors. The final EIS must research and analyze the impacts of displacing these visitors, and what effects those impacts would have on surrounding communities.

The draft EIS also failed to analyze the impacts of potential increased daily visitation to Old Faithful under Alternative B. Alternative B implements a mass transit system of 20-30 buses and a fleet of 45 fifteen-person passenger vans. Alternative B proposes to increase daily visitation to Old Faithful by almost 130% [Vol. 1, Page 218]. The final EIS must analyze the impacts of increasing daily visitation.

Visitor Experience

Alternative B has several major negative impacts to visitor experience. The first and foremost is plowing the road from West Yellowstone to Madison to Old Faithful. Alternative B eliminates the Grand Loop experience for all winter visitors. The Grand Loop is an effective transportation system for dispersing visitors. The elimination of the loop will also cause greater congestion at popular attractions. The EIS must analyze in further detail the effects of greater congestion at these attractions.

Additionally, plowing will create berms of snow that will detract from scenery viewing opportunities. Visitors will lose personal freedom to stop and view attractions or wildlife along the trail at their own pace because of the implementation of the mass transit system.

Furthermore, plowing the West Yellowstone to Madison Jct. to Old Faithful road eliminates Idaho's own version of the "Grand Loop". The ability to originate in Idaho and loop through the John D. Rockefeller, Jr. Memorial Parkway and Yellowstone National Park is contingent on these trails. The 1994-5 Idaho Winter Sports and Recreation survey by the University of Idaho indicates that looping trail systems add to the quality of experience for 88% of the snowmobiling public.

The North, South, and East Entrances do not have the infrastructure to support a large displacement of snowmobile visitors from the West entrance. These entrances do not have the lodging facilities, rental facilities, or fuel facilities necessary to support a large increase in snowmobile activity. The plan fails to note that moving the snowmobile traffic from West Yellowstone to the other entrances has the potential to increase the use on the snowmobile trails leading from the North, South, and East Entrances. An increase of use will require more frequent grooming of the trails, or trail conditions will deteriorate. The Final EIS must analyze the impacts that these deteriorated trail conditions will have on the winter visitor experience.

Alternative B will also eliminate some ungroomed non-motorized trails between Lewis and Shoshone Lake. The State of Idaho is opposed to the elimination of these opportunities. The NPS should be looking for more ways to provide non-motorized travel away from main motorized routes. The plan should provide for expanded non-

motorized opportunities, not fewer, in order to reduce conflicts between motorized and non-motorized visitors. A perfect way to expand non-motorized trail opportunities would be to create groomed routes within the interior of Grand Teton National Park along the Teton Park Road and the Moose-Wilson Road.

Air Quality

Another problem with Alternative B is the requirement that snowmobile emissions must be substantially reduced (hydrocarbons by a minimum of 70%, particulates by 75%, and Carbon Monoxide by 40%) by the winter of 2008-2009. Current technology does not provide a mechanism for a two-stroke engine to meet this requirement. This requirement would force snowmobile manufacturers to produce a four-stroke engine, which would make snowmobiles heavier, less responsive, and harder for the average person to handle.

Emission standards are only one way to address air quality concerns associated with public health. Another way to reduce emissions is to require all commercial snowmobile operators to use bio-base fuels and lubricants. Concessionaires within the park should also be required to sell bio-base fuels and lubricants. This action would affect 70% of the snowmobiles that travel to Yellowstone National Park.
Additionally, requiring all west gate entrance passes to be pre-purchased at local outlets, or at the Public Lands Information Center in West Yellowstone, would improve air quality at the Park entrance.

The Environmental Protection Agency is currently developing emission standards for all off-road engines, including snowmobiles. There is no need for the NPS to set emission standards, when the EPA process will provide us with national standards for snowmobiles in the near future.

Snowmobile Sound

The assumption for instituting draconian sound measures for snowmobiles under Alternative B is flawed. The draft EIS assumed that snowmobiles must have the sound at or below 78dbA at 50 feet (the requirements set forth in 36 CFR 2.18). The flaw in the assumption is that 36 CFR 2.18 requires that snowmobiles be operated at full throttle, but most snowmobiles are not being operated at full throttle. More research on snowmobile sound within the parks is needed before regulations are developed.

Additionally, Alternative B is likely to increase sound in some travel corridors within the park. A tour bus with a diesel engine creates 80 decibels of sound at 50 feet going 40 mph. The sound frequency of automobiles and buses is lower than the sound frequency of snowmobiles, so the sound of buses and automobiles travels farther than the sound of snowmobiles. The EIS must further analyze the sound impacts of buses and automobiles.

Human Health and Safety

Alternative B will pose several problems with safety, the first being the reduction of snowmobile routes. This reduction will create additional traffic on the remaining snowmobile routes, which will cause trails to deteriorate. Additional moguling makes a trail more difficult to travel and poses an increased risk for snowmobile accidents.

Plowing the road between West Yellowstone and Old Faithful will create large berms that will funnel wildlife down the road towards either Old Faithful or West Yellowstone, and will lead to increased numbers of ungulates exiting the Park at West Yellowstone. This situation raises several issues that are of serious concern. First, there will be an increased likelihood of collisions between buses, vans, trucks, and wildlife as ungulates are confined to the roadway by the berms. Collisions between wildlife and wheeled vehicles in Yellowstone National Park are already greater by a factor of 3 to 1 over snowmobiles. Second, bison that get caught between the berms and end up in either the parking lot at Old Faithful or the streets of West Yellowstone will pose a substantial risk to public safety. Additionally, those bison that exit the Park at West Yellowstone will increase already serious disease

control issues.

Alternative B will also decrease safety in another aspect. Plowing the road from West Yellowstone to Old Faithful will draw more nontraditional winter visitors, who may not have the appropriately equipped vehicles or the driving skills to handle winter conditions in and around the park. The Idaho Department of Transportation reports that the 45.05 miles of US-20 from the north side of Ashton to the Idaho State line for the 3-year period 1996-98 average traffic count was 4,523 during the summer months and 1,808 during the winter. There were 59 accidents recorded in the summer months and 111 in the winter months for the 3-year period. This calculates to 0.63 accidents per million vehicle miles for the summer and 2.13 accidents per million vehicle miles in the winter. Alternative B will create greater public safety concerns for personal property and injury.

Economic Impact

Alternative B contains very little economic impact analysis of how this management plan would impact the surrounding communities and the Greater Yellowstone Area. This obviously needs to be considered and should have been presented by the Park Service.

As an Example, implementation of Alternative B will eliminate Idaho's version of the "Grand Loop". This particular trail (from Ashton, Idaho to Flagg Ranch to West Yellowstone and back to Ashton) has a direct positive impact on the economy of Ashton, and all of Fremont County Idaho. Termination of this much utilized trail will exacerbate the economic difficulties of a community and county already depressed by reductions in resource based industries. Additionally, the inability to disperse snowmobilers along this route through the National Parks may require more frequent grooming in Idaho, which will necessitate the expenditure of additional funds by Fremont County and the state of Idaho. Further analysis must be completed regarding Alternative B's impact on the economy of Ashton, Idaho and Fremont County.

Furthermore, plowing and sanding the road from West Yellowstone to Old Faithful will have very high costs (potentially $20,000 per mile). The survey data, which show the "estimated median willingness to pay for the plowing to be $6.14 per person", indicate that other sources of revenue will have to be tapped by the Park Service just to keep the road open.

Natural Resources

Alternative B plows an additional 30 miles of road, which causes increased habitat fragmentation for wildlife by creating barriers to movement of ungulates. This includes structural barriers formed by snow berms created by the plowing operation. These snow berms will block or seriously disrupt traditional wildlife movement patterns, including access to traditional wintering areas.

The plowing action will also require sanding of the road surfaces. Much of the road between West Yellowstone and Old Faithful is located in riparian areas. Sanding will cause an increase in sediment deposited in springs, streams and rivers, some of which are habitat for species that are proposed for protection under the Endangered Species Act. The final EIS must address the potential impacts from this increased sedimentation.

Conclusion

As currently written, none of the alternatives in the Draft EIS are acceptable to the State of Idaho. The preferred alternative in the Final EIS must address a number of issues including the following:

- Adaptive management- an adaptive planning approach that allows the results of new and ongoing research and monitoring to be incorporated after it is has been subjected to peer review. In order for land management

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plans to be successful, a plan must be adaptable to new information and changing conditions. The Yellowstone ecosystem is not static; it is constantly changing. These changes need to be monitored, and the plan should be changed when information indicates the need for change.

- Viability of local park-dependent businesses- the well being of the rural economics that have grown dependent on winter visitors to Yellowstone National Park must be taken into consideration in the final plan.
- Natural Resource and Wildlife protection- the final plan must adequately address wildlife and natural resources concerns using sound peer reviewed science.
- Enhancement of visitor experiences- the NPS should attempt to expand recreational opportunities not limit them.

For these reasons, the State of Idaho does not support the alternatives presented in the Draft EIS. Idaho's concerns, however, are adequately addressed by the proposals submitted by the states of Montana and Wyoming, and would recommend the adoption of either of those proposals.

Sincerely,

DIRK KEMPTHORNE
Governor

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Page 1. Re: NPS Policy. NPS has been clear about its decision-making authority throughout the process. The cooperating agencies have concurred that the final decision lies with the park service. CEQ Regulations do not stipulate the rationale for selecting a preferred alternative in an EIS. It stipulates that in a final EIS, a preferred alternative must be identified. The statement of preference for one or more alternatives in a DEIS is discretionary, depending upon whether the agency has a preference at that point (§1502.14(e)). The identification of a preferred alternative in a DEIS should be regarded by the public as extremely tenuous. This is because an EIS is to serve as a means of assessing impacts of proposed agency actions "rather than justifying decisions already made" (§1502.2(g)). The FEIS preferred alternative may be viewed more as a "precursor" decision, which will only become final in a Record of Decision that expresses the rationale for the choice. In any case, it is clear that merely the expression of a preferred alternative, by itself, does not invalidate the EIS analysis. The decision-maker can select any of the options provided in a Final EIS by weighing the effects analysis alongside law, policy and regulation.
Page 1. Re: Visitor use and access. Alternative B responds to issues and resource needs associated with the current management situation. As with the other alternatives, there are consequences associated with it that are disclosed in the EIS. Other alternatives in the EIS provide for continued snowmobile access from West Yellowstone. All alternatives remain available in the range of choices for the final decision.
Page 2. Re: Eliminating snowmobile access at West Yellowstone. As with the other alternatives, there are consequences associated with it that are disclosed in the EIS. This alternative will remain in the range of choices available to the decision maker.
Page 2. Re: Plowing displacing snowmobilers to the North, South, or East Entrances. On the one hand, cooperating agencies have expressed the notion that some alternative features, e.g. plowing the road from West Yellowstone, will devastate local communities because snowmobilers will no longer come. On the other hand, they express the notion that snowmobiles will be displaced to adjacent lands outside the national parks. These notions are inconsistent. In responding to legitimate concerns about both topics – economic impacts and impacts on adjacent lands – NPS will develop scenarios of how management changes might affect use. NPS wishes to note that this is an exercise covered in CEQ regulations (§1502.22(b)(4)), wherein a theoretical approach may be taken to evaluate impacts that are reasonably foreseeable.
Page 2. Re: Potential increased daily visitation to Old Faithful under alternative B. Commenter is concerned about devastating the local economy (at West Yellowstone), yet implies that day use originating from West Yellowstone will overrun Old Faithful. In alternative B, NPS illustrates that plowing the road from West Yellowstone to Old Faithful can provide opportunities for the same number of people that presently use the route using snowmobile and snowcoach access. This is evaluated in the DEIS on pages 217-218, partly in response to the pre-DEIS issue that plowing the road could not allow access for the current number of visitors.
Pages 2-3. Re: Visitor experience impacts under alternative B. The DEIS discloses the visitor experience and access impacts of alternative B, pages 217-223.
Page 3. Re: Air quality under alternative B. Industry has not been highly responsive to the environmental issues relating to 2-stroke engines. NPS feels it is possible for industry to develop and implement suitable technology for cleaner and quieter machines, especially if it has 8 or 9 years to do it. EPA and NPS are concerned about allowing this amount of time for snowmobiles to operate and continue producing at pollution current levels. The use of less polluting fuels and oils is a feature of several alternatives. Pre-paid passes have been implemented as an interim measure to protect the health of park employees and visitors at the gate. However, not all people avail themselves of this service, and much is given up in the way of necessary visitor contacts when people use the service.
Page 3. Re: The EPA is currently developing emission standards for all off-road engines, including snowmobiles. EPA indicates that NPS should proceed with alternative features that are designed to improve air quality to the extent that it is expected in national parks. EPA notes that it is within NPS authority to manage air resources, and that in fact NPS has the affirmative responsibility to do so under the Clean Air Act.
Page 3. Re: Sound. Sound that is emitted by current snowmachines is an issue, in terms of its impacts on the natural soundscape and on other visitors. Clearly, one alternative to the current situation is to reduce the allowable sound produced by snowmachines. Industry plays a role in that it is technologically possible to reduce snowmobile sound.
Page 3. Re: Sound analysis. NPS will improve its analysis of sound for the FEIS, including sounds emitted by other forms of transport.
Page 3. Re: Additional moguling makes a trail more difficult to travel and poses an increased risk for snowmobile accidents. Changes in use will be evaluated

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more thoroughly in the FEIS, by virtue of a reasonably foreseeable impact analysis for each alternative.
Pages 3-4. Re: Safety concerns about the plowed road section in alternative B. NPS is aware of inherent risks associated with winter driving either on plowed or groomed routes. This rationale would apply to every road or groomed route in the GYA. Safety concerns and potential impacts of alternative B are discussed on page 203 of the DEIS. There would be sections having relatively high berms, but in our judgment there would be no significant difference from a visual and safety standpoint between this road segment and the road between Colter Bay and Flagg Ranch or other plowed roads in the GYA. Plowing the road will not increase "serious disease issues" associated with bison. In alternative B, most new or "nontraditional" users of a plowed route would access Old Faithful by mass transit vehicle, not by personal transportation.
Page 4. Re: Economic impact. Economic analysis is being updated for the FEIS, including the use of the economic impact model for the 5-county area surrounding the parks, as requested by the cooperating agencies.
Page 4. Re: Plowing and sanding costs. The cost of all alternatives, relative to the cost of current management was disclosed in the DEIS, Appendix F.
Page 4. Re: Impacts of alternative B on wildlife. The effects of Alternative B, including impacts of plowed and groomed surfaces on wildlife, are disclosed in the DEIS pages 208-214.
Page 4. Re: Impacts of sanding road surfaces. Sand removal for this purpose is a standard practice for routes that are plowed.
Page 4. Re: Adaptive management. Adaptive management is an alternative feature that will be in the range of choices for the decision maker. Commenter's note that plans must be adaptable for changing conditions is correct. That is in part why NPS engaged in an EIS process to produce a "programmatic" plan, rather than a project level, site-specific plan. The decision maker will consider all FEIS alternatives and their effects on local economies, visitor experience, and natural resources before making a decision. The consideration of these factors, and the rationale for selecting an alternative will be explained in the record of decision.