

YELLOWSTONE NATIONAL PARK

# Draft SEIS/Winter Use Plan Frequently Asked Questions

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August 13, 2012

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## **Introduction to the Frequently Asked Questions (FAQs)**

We've compiled this Frequently Asked Questions (FAQs) document to better explain the Draft Supplemental Environmental Impact Statement (SEIS)/winter use plan. In it you will find information about the three action alternatives, the National Park Service preferred alternative, how it may affect you as one of our stakeholders, and how you can be involved in our public comment process.

## **Winter Use in General**

### ***Why does the park need a special regulation to allow winter use?***

Oversnow vehicles (OSVs) are not allowed in national parks unless parks have a special rule allowing their use. In order to authorize the continued use of OSVs Yellowstone, the NPS must complete the Supplemental Environmental Impact Statement, sign a record of decision (ROD), and complete a special regulation.

### ***Why hasn't the Yellowstone winter use issue been resolved yet?***

Winter use in Yellowstone has been debated for more than 75 years in more than a dozen separate court cases. Over the years, concerns have centered on a range of evolving issues from plowed roads in the park to snowmobile and snowcoach use. We've passed through several chapters of winter use – from no regulation of oversnow vehicles to a managed use era, in place since 2004. But because the park has a variety of stakeholders who are deeply passionate about Yellowstone, it has been difficult to strike the right balance between protecting the park's natural resources and allowing for an appropriate level of use and enjoyment at Yellowstone.

### ***What is a Supplemental Environmental Impact Statement (SEIS) and what does it do?***

The purpose of this draft plan/SEIS is to establish a management framework that allows the public to experience the unique winter resources and values at Yellowstone National Park. This draft plan/SEIS will be used to determine whether motorized winter use in the interior of the park is appropriate, and if so, the type, extent, and location of this use. The SEIS does this by analyzing a range of alternatives for the management of winter use at Yellowstone National Park (Yellowstone or the park). The SEIS analyzes impacts of these alternatives in detail for wildlife and wildlife habitat, air quality, soundscapes and the acoustic environment, visitor use and experience (including visitor accessibility), health and safety, socioeconomic values, and park operations and management, including the impacts that would occur if the park were to allow no motorized access on our unplowed roads ("no-action" alternative).

Upon conclusion of the draft plan/SEIS and decision-making process, the final alternative selected for implementation will become the final winter use plan, which will specifically address the issue of oversnow vehicle (OSV) use in the interior of the park. It will also form the basis for a special regulation to manage OSV use in the park should an alternative be selected that allows OSV use to continue.

### ***Why are you preparing a SEIS instead of an EIS?***

We released a draft Environmental Impact Statement (EIS) in the summer of 2011. Public comments identified several issues that the park felt should be analyzed further before issuing a long-term regulation. In order to incorporate feedback and develop a sustainable solution to the winter use issue

that meets our goals and objectives to the greatest extent possible, the NPS decided to prepare a Supplemental Environmental Impact Statement.

***Is this a precursor to an examination of summer use?***

No. Because NPS policy requires a special rule be promulgated before allowing oversnow use, we have drafted a Supplemental Environmental Impact Statement (SEIS) to outline our proposed management plan.

***What impact topics do you evaluate in the SEIS?***

- Wildlife and Wildlife Habitat, including Rare, Unique, Threatened, or Endangered Species, and Species of Concern
- Air Quality
- Soundscapes and the Acoustic Environment
- Visitor Use, Experience, and Accessibility
- Health and Safety
- Socioeconomic Values
- Park Management and Operations

***What is new in this SEIS?***

A lot. In this SEIS we:

- Evaluate managing OSV visitation by Transportation Events
- Present new sound modeling results
- Present air quality modeling results
- Provide information on snowcoach interior sound levels
- Assess non-commercially guided snowmobile use
- Reduce speed limits for oversnow vehicles (OSVs) to 35 MPH
- Propose best available technology (BAT) standards for snowcoaches
- Propose improving BAT standards for snowmobiles
- Introduce enhanced BAT (e-BAT) standards for both snowmobiles and snowcoaches

**SEIS Schedule & Public Engagement Opportunities**

***What's your schedule for the SEIS?***

- June 29, 2012 – release of draft SEIS for 45-day comment period
- Late August, 2012 – release of proposed rule for public comment
- Fall 2012 – Final EIS released
- December 2012 – Sign Record of Decision (ROD) and publish a final regulation

***Where and when are the SEIS public meetings?***

For all public meetings, the doors open at 6:30 PM.

- Monday, July 16<sup>th</sup>, the Virginian, Jackson, WY
- Tuesday, July 17<sup>th</sup>, the Holiday Inn, West Yellowstone, MT
- Wednesday, July 18<sup>th</sup>, the Wingate by Wyndham, Bozeman, MT
- Thursday, July 19<sup>th</sup>, the Holiday Inn, Cody, WY



***How can I comment on the SEIS?***

We accept comments on both documents in several ways.

1. Go online to the National Park Service’s Planning, Environment and Public Comment website (PEPC). The online link is: <http://parkplanning.nps.gov/yell> Once there, click on the “Winter Use Plan” link and follow the instructions.
2. Comment in person at any of the four public meetings that we have scheduled during the comment period.
3. Comment in writing by mailing your letter to:  
Winter Use Planning  
P.O. Box 168  
Yellowstone National Park, WY 82190
4. Hand deliver your written comments to:  
Management Assistant’s Office  
Headquarters Building, Mammoth Hot Springs  
Yellowstone National Park, WY 82190

***When does the draft SEIS comment period end?***

The draft Supplemental Environmental Impact Statement will be open for a 45-day comment period following publication of the Environmental Protection Agency (EPA) notice of availability. The public comment period will end on Monday, August 20, 2012.

***Why is the comment period only 45 days instead of 60?***

We are committed to having a sustainable plan for winter use in place by the beginning of this winter season. To meet our December 15 deadline, we need to limit the comment period to 45 days. You will have an opportunity to comment on the draft rule in late August, 2012.

***What happens after the public comment period closes?***

All the comments we receive are read, coded, and included in an analysis of public comments. We use substantive comments to help shape our proposed rule and final Supplemental Environmental Impact Statement (SEIS).

***I’ve commented in the past - why should I continue to comment?***

Feedback from the public and our stakeholders is a critically important part of the winter use planning process. This Draft Supplemental Environmental Impact Statement is our attempt to address concerns expressed during last year’s comment period and the scoping period held in this past spring. We hope that you’ll continue to provide us with your valuable feedback.

***Is this a vote? Why don’t you just do what a majority of the public comments asked?***

Public comment periods are not a vote. Winter-use planning, like all planning at Yellowstone, requires us to protect and preserve the park while providing for an appropriate level of winter use. Comment periods help us identify a range of alternatives, find gaps in our research, and refine the purpose, need, and objectives for this plan. Public comments inform how we manage the park for winter use, as does

Careful analysis of the effects, both good and bad, that each alternative might have on the park and its resources.

***What is a substantive comment?***

Substantive comments address the purpose, need, and objectives of the plan, the range of alternatives, elements of an alternative, the preferred alternative, the impact analysis, or any additional data or studies that we may not have included.

**SEIS Alternatives**

***What alternatives are evaluated in the SEIS?***

1. Alternative 1: no public OSV use because the interim regulations in effect from 2009 to 2012 would have expired. Approved non-motorized use would continue.
2. Alternative 2: manage OSV use at the same levels as the interim regulations in effect from 2009 to 2012 (up to 318 snowmobiles and 78 snowcoaches per day). Implement best available technology (BAT) standards for snowcoaches.
3. Alternative 3: allow for the same level of use as alternative 2 (up to 318 snowmobiles and 78 snowcoaches per day), but would provide for a three year transition to snowcoaches starting within the 2017/2018 winter season, when all snowcoaches would be required to have best available technology (BAT). Upon completion of the transition (by the winter season 2020/2021), there would be zero snowmobiles and up to 120 snowcoaches per day in the park.
4. Alternative 4 (NPS draft SEIS preferred alternative): manage OSV use by transportation events, with 110 total events each day. Up to 50 events would be allocated for snowmobiles and the remaining 60 for snowcoaches. Four events would be for noncommercially guided snowmobile access. This is the agency preferred alternative.

***What happened to the road plowing and variable use alternatives?***

We eliminated some alternatives from the 2011 draft EIS that were deemed infeasible technically or economically, did not meet the purpose of and need for the project, created unnecessary or excessive adverse impacts to resources, and/or conflicted with the overall management of the park or its resources. We dismissed the 2011 draft EIS preferred alternative (variable use) due to the public's concern with the concept. A complete list of the alternatives considered, as well as those considered but dismissed from further analysis, is provided in chapter 2 of the draft plan/SEIS.

***Why is alternative #4 the preferred alternative?***

First and foremost it protects that park. By managing snowmobiles and snowcoaches by transportation events, alternative 4 would create a cleaner, quieter park than the interim regulation would provide, all the while allowing for more visitors to enter the park. It also encourages innovation and clean technologies for OSVs and allows for limited noncommercial access by snowmobile.

## **Alternative #4 (NPS draft SEIS preferred alternative)**

### ***Describe alternative #4 in a nutshell***

Alternative #4 manages oversnow vehicles (OSVs) by transportation events, or discrete groups of tour events entering the park. By reducing the total number of transportation events, we are able to make the park cleaner and quieter than it would be under maximum allowable levels today while at the same time allowing for increases in visitation.

### ***What are the key elements of alternative #4?***

- Snowmobiles and snowcoaches authorized for use in the park
- Two-year transition period to the new framework
- Non-commercially guided snowmobiles have access to the park
- Snowcoaches would be required to meet BAT standards by the 2017-2018 winter season
- New BAT standards for snowmobiles would be implemented by the 2017-2018 winter season
- Enhanced BAT (E-BAT) standards would allow for increases in the average number of vehicles in each transportation event

### ***How did you select alternative #4?***

In selecting a preferred alternative we considered:

- How well alternatives met our dual mission to protect the park and allow for visitor access
- The result of our impact-analysis studies from this and previous Environmental Impact Statements (EISs)
- How well alternatives met the purpose, need, and objectives for our Draft SEIS
- The comments we received during this and previous planning efforts

Of the proposed action alternatives, alternative 4 best fulfilled the above criteria.

### ***How long has the interim regulation levels (status quo) been in place?***

The park has allowed 318 snowmobiles and 78 coaches in the park for the past three winter seasons.

### ***The current alternative is based on the idea that snowmobiles would get better. Have they?***

They have not. When best available technology standards (BAT) were first introduced, snowmobile manufacturers produced models that outperformed existing standards – the Arctic Cat T660 operated at 72 decibels (dBA) and released 112 grams of carbon monoxide per kilowatt hour. Today manufacturers have doubled snowmobile horsepower but produced machines that are louder and dirtier – at 75 dBA and 120 grams of carbon monoxide per kilowatt hour. In short, the industry has come right up to the line without keeping its promises to continue getting cleaner and quieter. Our proposed BAT standards – 67 dBA and 90 grams of carbon monoxide per kilowatt hour – reflect the levels manufacturers could have reached had they continued to innovate on those first BAT compliant snowmobiles. We believe these standards to be aggressive yet are also reasonable, and attainable.

### ***During these hard economic times, how can the park justify the cost of keeping Sylvan Pass open?***

Our planning process takes into account several factors. One of those factors is cost, but other factors include visitor experience and comments received during our last scoping period. We explored action alternatives that would close Sylvan Pass – including Alternative 3 in this draft Supplemental Environmental Impact Statement (SEIS) – but chose a preferred alternative that took into account our mission to protect visitor use and experiences.

***What determines how long a plan lasts?***

Generally, rules put in place last 15 to 20 years. Our preferred alternative also calls for an adaptive management process, which allows the National Park Service to take steps in further reducing impacts to the park, within the scope of the analysis of the document, without beginning a new planning process. Should there be an impetus for changing the rule – the introduction of better technology or a finding of unsatisfactory impacts – the park may begin another planning process at any time.

***Is Alternative 4 the park's final alternative, the one that will guide use for the next 20 years?***

It depends. Public comments are a vital part of our planning process. If public comments reflect satisfaction with the alternative as it exists now, it could move forward as our final rule. Elements of Alternative 4 could also change based on public comment, the park could select one of the other two action alternatives based, or the park could use elements from all three action alternatives in a new alternative.

## **Transportation Events**

***What is a transportation event?***

A transportation event is initially defined as one snowcoach or a group of seven snowmobiles (on average) travelling together within the park and is based on evidence that a snowcoach and a group of snowmobiles have comparable impacts to resources and contribute similarly to the quality of visitors' experiences.

***What is the concept of transportation events based on?***

Transportation events are based on the foundation of comparability –that one snowcoach and a group of snowmobiles have comparable impacts to air quality, the soundscape, wildlife, and visitors' experiences at Yellowstone. Transportation events allow us to move away from managing oversnow vehicles (OSVs) by specific numbers and instead, manage winter use by impacts to the park itself.

***How do you know that 1 snowcoach and 7 snowmobiles are actually comparable?***

We looked at the impacts to resources of snowcoaches and groups of snowmobiles across several impacts categories, including those that affect natural resources, economics, health and safety, and visitor use and experience.

For example, when it comes to how wildlife respond to oversnow vehicles (OSVs) both psychologically and behaviorally, recent monitoring and modeling data indicate that bison and elk are slightly more likely to respond to snowmobiles, but are more likely to have a stronger response – movement or flight – to snowcoaches (Borkowski et al. 2006; McClure et al. 2009; White et al. 2008).

With regard to soundscape data, specifically how long a single transportation event can be heard, data collected at 14 different locations in the park from 2005 to 2011 show that groups of snowmobiles could be heard, on average, for 3 minutes and 4 seconds while snowcoaches could be heard, on average, for 2 minutes and 46 seconds. Over the course of 1,127 distinct events measured, the overall difference in how long snowcoaches and snowmobiles could be heard was 17 seconds.

Visitor satisfaction data from a recent survey show that 100 percent of visitors were either 'very satisfied' (87%) or 'somewhat satisfied' (13%) with their overall experience in the park in winter (Friemund et. al 2009). For additional details and examples see chapter 4 of the SEIS.

***If snowmobile and snowcoach events really are comparable, why are you capping the number of snowmobile events at 50?***

Public comments reflected strong support for placing limits on all OSVs in the park, including the total number of snowmobiles. We believe a cap on snowmobile events provides balance between science and our stakeholders.

***Why does grouping vehicles together make a difference?***

Transportation events group vehicles – and therefore disturbances – together. Our sound modeling suggests that packaging vehicles into groups, regardless of the type of oversnow vehicle (OSV), limits how long OSVs can be heard and reduces the impacts OSVs have on visitors and wildlife. In other words the same numbers of vehicles produce fewer impacts when grouped together than when traveling individually. Managing OSV use this way creates fewer disturbances to wildlife, the natural soundscape, and to visitors and allows the park to increase the number of visitors that could be accommodated each day.

***How close together should snowmobiles be to be considered grouped?***

Snowmobiles will be required to travel within 1/3 mile between the first and last snowmobile. Limiting the total distance between the first and last snowmobile in a group, along with lowering the oversnow vehicle (OSV) speed limit to 35 MPH helps ensure that OSVs can still travel safely and have minimal impacts to wildlife and the natural soundscape.

***How did you come up with the numbers for a transportation event?***

For the past 8 years, regardless of the number of snowmobiles we have allowed in the park, snowmobiles have averaged about 7 per group. We next examined the impacts of snowcoaches and groups of snowmobiles to the park. Our data show that when held to our proposed BAT standards, a group of snowmobiles and a single snowcoach have comparable soundscape, air quality, and wildlife impacts. Because actual use averages 7 snowmobiles per group, and because groups of that size show similar impacts to a snowcoach, our proposed alternative allows for 1 snowcoach, or an average of 7 snowmobiles per transportation event.

***Are guides included in the group limit for snowmobile transportation events?***

Yes, the maximum and seasonal average group size for commercially and non-commercially guided snowmobiles includes a guide.

***Have you considered reducing the number of snowmobiles per group, but increasing the number of snowmobile transportation events allowed?***

Our data show that it is the number of events, NOT the total number of vehicles in the park that cause impacts to Yellowstone’s air quality, wildlife, and natural soundscape. For those reasons, our preferred alternative caps the total number of transportation events, but allows for flexibility in the number of vehicles in one transportation event.

***If we begin running electric snowmobiles, can the cap on the number of snowmobile transportation events be lifted?***

It’s difficult to make predictions for future technologies. While electronic snowmobiles may reduce impacts to Yellowstone’s air quality and natural soundscape, limiting the total number of transportation events will continue to lessen impacts to wildlife and visitor and staff health and safety. For that reason, we are proposing to continue managing winter use with an upper limit for transportation events, but will continue to encourage and reward innovation in oversnow vehicle (OSV) technology. The adaptive management process may allow an adjustment of group size limits for a transportation event if vehicles continue to get cleaner and quieter.

***How many daily transportation events would there be and how would they be allocated?***

Yellowstone would allocate up to 110 transportation events daily, with up to 50 transportation events for groups of snowmobiles. Four transportation events would be reserved daily for non-commercially guided groups of snowmobiles.

The total number of snowmobiles and snowcoaches in Yellowstone on a given day would vary depending on how operators allocate their transportation events and how visitors choose to enter the park. If operators allocate more of their events to snowcoaches, there would be fewer snowmobile transportation events in the park. Conversely, if operators use the maximum of 46 commercial snowmobile transportation events, there would be fewer snowcoach transportation events in the park.

If all 106 snowcoach transportation events are used in a single day – leaving 4 transportation events for non-commercially guided snowmobile groups – there would be 106 snowcoaches in the park. If, on the other hand, operators used the maximum available transportation events for snowmobiles – 46 for commercially guided groups and 4 for non-commercially guided groups – there would be a maximum of 60 snowcoaches in the park. If oversnow vehicles meet an enhanced BAT (E-BAT) standard, the number of snowcoaches could potentially double.

Transportation Events would be allocated across the four gates and Old Faithful as follows:

Park Entrance/ Location	Commercially Guided Snowmobiles	Noncommercially Guided Snowmobiles	Commercial Snowcoaches
West Entrance	23	1	26
South Entrance	16	1	10

East Entrance	3	1	2
North Entrance	2	1	10
Old Faithful	2	0	12
Total	46	4	60

***How does 110 transportation events compare to current oversnow vehicle use?***

In the winter of 2011/12, the park averaged approximately 65 transportation events per day. However, under the maximum allowed, there could have been anywhere from 110 to 237 transportation events daily.

The proposed alternative would cap the total number of transportation events at 110 per day. While the preferred alternative may increase the number of oversnow vehicles (OSVs), it decreases impacts by limiting the number of transportation events in the park. The calculations below assume 7 snowmobiles per transportation event unless stated otherwise. Peak days reflect usage on holidays such as President’s Day weekend.

- Average day: 190 snowmobiles + 35 snowcoaches = 63 transportation events
- Peak day: 261 snowmobiles + 56 snowcoaches = 93 transportation events
- Maximum allowance, 10 snowmobiles per group: 318 snowmobiles + 78 snowcoaches = 123 transportation events
- Maximum allowance, 2 snowmobiles per group: 318 snowmobiles + 78 snowcoaches = 237 transportation events

***Alternative #4 allows for a seasonal average of 342 snowmobiles in the park but up to 480 snowmobiles on peak days. If the limit is 318 today, why would you allow for an increase?***

Focusing on vehicle numbers alone is misleading because impacts to resources such as sound and wildlife stem from groups, not individual OSVs per se. While our preferred alternative does allow for higher number of total snowmobiles, it caps the number of transportation events – which again is what causes impacts to resources. Further, snowmobiles and snowcoaches under the preferred alternative would not be the same as snowmobiles and snowcoaches today. Each would be subject to sound and emission standards that would lessen their impact on the park. Second, the preferred alternative requires that snowmobile groups have a maximum seasonal average of 7 vehicles per group. To compensate for the few peak days that operators may run groups of 10 snowmobiles, they would have to limit group size on trips throughout the rest of the winter season.

***How will you monitor and ensure compliance with the seasonal average of 7 snowmobiles per transportation event?***

The exact same way we manage vehicle number limits today – requiring operators to report use

numbers. By allowing operators to manage their group averages throughout the season, operators will have greater flexibility in meeting visitor demand while minimizing their impacts to the park.

***Is NPS administrative travel considered or factored in the allocations?***

No. While we accounted for National Park Service administrative travel in our modeling, the total number of daily transportation events does not include administrative travel. All administrative vehicles will also be required to meet the proposed BAT standards by the 2017-2018 season.

## **Wildlife**

***Since 2008, have there been any new studies to determine what impact oversnow vehicles have on wildlife?***

No. Park scientists are certain that 110 transportation events would have impacts below our acceptable level of impact.

***If there have been no new studies, how can you be sure that individual bison and elk are not impacted by oversnow vehicles?***

Winter use will have some effects on wildlife, just like every other form of visitor access to the park. Extensive studies of the behavioral responses of five species (bison, elk, bald eagle, moose, and grizzly bear) 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).

***What about the population level impacts to wildlife as a result of oversnow vehicles?***

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). Use will be well below levels previously studied by NPS wildlife biologists and well within the limits recommended by those studies. There is no reason to suspect that recent winter use levels pose a risk of unacceptable impacts or impairment to any wildlife population.

***What about the issue of total number of oversnow vehicles exceeding those recommended by your wildlife biologists?***

In the peer reviewed scientific journal referenced here - "Behavioral Responses of Bison and Elk in Yellowstone to Snowmobiles and Snow Coaches," – the monitoring period the authors refer to spans from 1999 to 2004. During that time, daily use averaged up to 593 oversnow vehicles (OSVs) in the park per day. In that same period, the park accommodated peak use at 1,168 OSVs per day, and cumulative oversnow vehicle entries for the winter season for the West Entrance alone extended up to 46,885 for the winter season.



At the conclusion (page 1,924), the authors state that, “available data provide no evidence that levels and patterns of OSV traffic during the past 35 years adversely affected the population dynamics or demography of elk and bison.”

***How do snowmobiles and snowcoaches compare with respect to wildlife impacts?***

Based on wildlife monitoring, the odds of eliciting a movement response were higher for snowcoaches than snowmobiles. In the paper, “Behavioral Responses of Wildlife to Snowmobiles and Coaches in Yellowstone” by P.J. White, Troy Davis, John J. Borkowski, Robert A. Garrott, Daniel P. Reinhart, and D. Craig McClure (2006), the authors found, “The odds of observing a movement response were 1.1 times greater for each additional snowmobile, 1.5 times greater for each additional coach...” (page 12).

**Best Available Technology for Oversnow Vehicles**

***What is Best Available Technology (BAT)?***

Best Available Technology (BAT) is literally that - the best technology available in oversnow vehicle applications. Snowmobiles using in Yellowstone are already subject to a BAT standard that has been in place since December 2004. Under the preferred alternative, snowcoaches would be required to meet BAT standards, and snowmobiles would be required to meet an improved BAT standard. BAT sound and emission standards ensure that impacts caused by oversnow vehicles are at or below the moderate thresholds in our impact analyses.

***Regarding snowmobiles – what are the new BAT standards?***

Starting in the 2017-2018 winter season, snowmobiles would be required to meet a 68 dBA sound emission standard and emit no more than 90 g/kwh of carbon monoxide.

***How did you come up with 2017-2018 BAT standards for snowmobiles?***

Visitor use data shows that the average group size for snowmobiles has been 7, so we calculated what the BAT standard would need to be for individual snowmobiles in order to ensure that a group of 7 snowmobiles would also be 75 dBA. There has been some regression with regard to snowmobiles – we expected industry to build cleaner, quieter snowmobiles, but manufacturers have not yet delivered on that promise. These new standards help to ensure that the snowmobiles and snowcoaches running in Yellowstone are the cleanest and quietest available.

***Are snowmobiles meeting the BAT standard today?***

We know that several snowmobile models manufacturers are close to the upper bounds of our limits. When best available technology standards (BAT) were first introduced, snowmobile manufacturers produced models that outperformed existing standards. Model year 2004-2007 snowmobiles such as the Arctic Cat T660 came very close to meeting the standards that we’re proposing, operated at 72 dBA, and released 112 grams of carbon monoxide per kilowatt hour – 10 to 15 percent cleaner than current snowmobiles operating in the park. Bombardier Recreational Products, the manufacturer of Ski Doo Snowmobiles, is already manufacturing machines that emit 95-98 grams per kilowatt hour of carbon monoxide..

***Regarding Snowcoaches – what will BAT be and when will it be required?***

Gasoline snowcoaches will be required to be 2007 model year or later – ensuring they are EPA Tier 2 compliant. Diesel powered snowcoaches will be required to be 2010 model year or newer or be EPA “engine configuration certified” for air emissions. All snowcoaches will also be subject to a 75 dBA sound emission standard by the beginning of the 2017-2018 winter season.

***How did you come up with 2017-2018 BAT standards for snowcoaches?***

Because there is no industry for snowcoaches, we took a census of the current snowcoach fleet and cross-referenced these data with acoustic monitoring data to assess what could reasonably be achieved for air and sound emissions. We felt that 75 dBA is an aggressive but realistic standard for snowcoaches. Snowcoach will be required to be EPA Tier 2 by winter 2017-18 to ensure tailpipe emissions are low.

***Will there be an allowance or testing method so older snowcoaches that meet BAT could be used?***

NPS has proposed a 10-year lifespan for snowcoach engines because of the loads and stresses put on such vehicles when equipped with tracks and driven over snow at high elevation. At this time, there is not an option for vehicles with engines older than 10 years to be recertified as BAT vehicles.

***How will you measure the sound output of OSVs?***

Snowmobiles will continue to be measured and reported following the Society of American Engineers (SAE) J192 test standards. For snowcoaches, we’ll use a method modified slightly from the one the Volpe Transportation Center used in 2008 and 2009. The testing methodology is basically a constant cruising speed pass-by test. The NPS will conduct all snowcoach sound testing.

***How will you measure air emissions of OSVs?***

Because there are no industry standards for measuring snowcoaches, snowcoaches will be required to meet Tier 2 EPA standards for specific engine year models, 2007 or later for gasoline engines and 2010 for diesel run engines. This is a technical specification and is based on the recommendation of the Environmental Protection Agency (EPA).

Snowmobiles will continue to be tested and reported on following the same methods that have been in place for the past 8 seasons.

Both oversnow vehicles (OSVs) will be subject to on-the-ground testing in the park. Additionally, one of our key interest areas for adaptive management is to work with our stakeholders to create a framework so that the impact thresholds we’ve set today are not exceeded.

***Why are you measuring snowcoaches individually at cruising speed but measuring snowmobiles at full throttle?***

Because snowcoaches are modified from wheeled vehicles locally, there is no formal snowcoach industry. Therefore, we test snowmobiles here in the park at cruising speed. The NPS selected the SAE J192 test for snowmobiles for the express purpose of providing certainty to operators. While snowcoaches are tested in the park, we opted to retain the SAE J192 certification for snowmobiles so

that when operators purchase a machine, they'll have 100 percent confidence that their vehicle meets the new BAT standards and will be allowed to operate in Yellowstone.

***Are you going to test every snowmobile in the park?***

No. Manufacturers report both sound and emissions data to the NPS prior to a model's certification for use in Yellowstone National Park. We reserve the right to conduct additional testing with snowmobiles as we deem necessary.

***What is E-BAT? What is it and what will it do?***

E-BAT, or enhanced BAT standards, reward operators and manufacturers for reducing oversnow vehicle noise outputs below the threshold we would mandate for them. By the 2017-2018 winter season, all snowcoach sound emissions will have to be below 75 decibels (dBA) at 50' at cruising speed, and all snowmobile sound emissions will have to be below 68 dBA, following the SAE J192 test standard.

If snowcoach sound emissions are below 71 dBA, they will qualify as E-BAT. This means that if the operators reduce the sound emissions for snowcoaches, they can run two e-BAT compliant snowcoaches in a single transportation event. If snowmobile sound emissions fall below 66 dBA, they will qualify as E-BAT. This means that operators' seasonal average group size could increase to 8 snowmobiles per transportation event, provided all those snowmobiles are E-BAT compliant.

***Do enhanced best available technology standards (E-BAT) allow transportation events to keep growing if snowmobiles and snowcoaches continue to get cleaner and quieter?***

The Supplemental Environmental Impact Statement (SEIS) allows for group sizes to increase from 1 to 2 snowcoaches or from an average of 7 to 8 snowmobiles if E-BAT standards are met. Under the adaptive management process the maximum group size could not exceed 10 snowmobiles or 2 snowcoaches per transportation event and the number of transportation events would remain capped at 110 unless the NPS were to initiate a new planning process.

***Why are you waiting until 2017-2018 to impose the new best available technology standards?***

The decision to select the 2017-2018 season as the effective date for new BAT standards came from a census of the current fleet of oversnow vehicles (OSVs), conversations with EPA, recent trends in air and sound emissions, and conversations with winter use concessioners about the frequency of snowmobile (leased, typically for 2 to 3 years) and anticipated snowcoach lifespans (estimated to be 10 seasons). The decision to allow a five year window before requiring a new BAT standard for snowmobiles was based on conversations with industry representatives and operators who indicated this was a reasonable timeframe for research and development and product development. However, this timeframe may be adjusted in the final Supplemental Environmental Impact Statement based on public comment.

***Snowmobiles are noisy and smelly. How can you justify them in America's oldest, most famous national park?***

The snowmobiles used in Yellowstone today are cleaner and quieter than those used elsewhere. Our best available technology (BAT) standards have significantly reduced snowmobile impacts to air quality and the amount of noise they generate. Further, our proposed alternative would put in place stricter BAT standards for snowmobiles, and reward operators and manufacturers for further improving on our

standards. The stricter best available technology (BAT) standards in alternative #4 acknowledge that snowmobile manufacturers have not delivered on promises to continue producing cleaner, quieter snowmobiles.

The National Park Service believes the new BAT standards for snowmobiles are reasonable and achievable.

***Your own science says snowmobiles are bad for Yellowstone. Why don't you just ban them from the park?***

Snowmobiles currently used in the park meet our existing BAT standard and in some cases are quieter and less polluting than snowcoaches.

## **Noncommercial Snowmobile Guiding**

***What is the difference between unguided and non-commercially guided?***

Unguided trips will not be permitted in the park and are defined as snowmobile groups that enter the park without having obtained certification through the Yellowstone Snowmobile Education Certification Program, without the necessary entrance permit, and without a commercial or non-commercial guide. Non-commercially guided groups enter the park with a non-commercial guide who has successfully completed a training program and has obtained a non-commercial guiding permit. Any snowmobile operator entering with a non-commercial guide will also be required to complete the Yellowstone Snowmobile Education Certification Course.

***What is the Noncommercially Guided Snowmobile Access Program?***

The Noncommercially Guided Snowmobile Access Program permits authorized parties to enter Yellowstone National Park without the requirements of a commercial snowmobile guide. Individuals would be required to have successfully completed a certification process and possess a noncommercial snowmobile access permit. The noncommercially guided snowmobile access program may be adjusted or terminated based on impacts to park resources and visitor experiences.

***What is the Yellowstone Snowmobile Education Certification Program?***

Is a to-be-developed online snowmobile education program that all noncommercial snowmobile operators must successfully complete. Individuals who successfully complete the Yellowstone Snowmobile Certification Program (details below) would receive a certificate of completion, valid for the duration of the season.

***How will the Noncommercially Guided Snowmobile Access Program be developed?***

The park will work with interested individuals and organizations to develop the noncommercially guided snowmobile access program and supporting Yellowstone Snowmobile Education Certification Program.

***Can anyone be a noncommercial guide?***

Any member of the public can be a noncommercial guide as long as he or she is at least 18 years of age by the first day of the trip, has a working knowledge of snowmobile safety, general first aid, snowmobile repair, and navigational technique, and has led no more than 2 trips throughout the winter season. He

or she must also be certified under the Yellowstone Snowmobile Education Certification Program and meet all other requirements under the Non-commercially Guided Snowmobile Access Program.

***Can commercial guides act as non-commercial guides for their friends and family?***

As long as commercial guides complete the requirements of the Non-Commercial Guided Snowmobile Access Program, they can act as non-commercial guides for their friends and family. These trips would be accounted for under the 4 daily transportation events set aside for non-commercially guided snowmobile groups. More information about the program and requirements for becoming a non-commercial guide is available in Appendix B of the draft Supplemental Environmental Impact Statement (SEIS).

***How many events will be allocated for groups of non-commercially guided snowmobiles?***

Daily, each of the four gates will be allocated one transportation event for non-commercially guided snowmobile access.

***How many trips can a non-commercial guide lead per season?***

Each non-commercial guide can lead up to two trips per season.

***I want to visit YELL in the winter, what do I need to do?***

Noncommercial guides would be required to possess a noncommercial snowmobile access permit which would be awarded annually through an online lottery system administered by [www.recreation.gov](http://www.recreation.gov). Additionally, each noncommercial snowmobile operator within the group would be required to have successfully completed an online Yellowstone-specific snowmobile training course that outlines snowmobile rules for the park including interactions with wildlife and other park users, snowmobile maintenance and repair, and first aid.

***What am I required to do on the day of my noncommercially guided snowmobile trip?***

On the day of your trip make sure that you and all of the snowmobile operators bring documentation that you have completed the Yellowstone Snowmobile Education Certification Program. Make sure that all snowmobiles in your group are BAT compliant and that all members of your trip have the necessary safety equipment. At the park entrance gate, an NPS ranger will check that privately owned snowmobiles are BAT compliant and that all members possess the necessary safety equipment and documentation. The NPS ranger will also run an on-site orientation session for all members of your group to reinforce components of the educational program you've completed and familiarize all members of your group with operating a snowmobile.

***Can non-commercially guided snowmobile groups leave the park and re-enter under the same transportation event?***

The non-commercially guided snowmobile program outlined in the Supplemental Environmental Impact Statement (SEIS) serves as a first draft for how the program may be designed and administered. While the current framework does not specify whether non-commercially guided groups can exit and re-enter the park under the same transportation event, we have heard in public comment that it's an issue to consider further and we are exploring that possibility. We look forward to comments on how we can best address this issue.

***Can there be multiple night stays for non-commercially guided snowmobile groups?***

At this time, the Supplemental Environmental Impact Statement (SEIS) allows for a two night stay per non-commercially guided event. However, additional days in the park would result in additional transportation events, and the details of how these transportation events will be accounted for have not yet been decided. At this time, the question of multiple night non-commercially guided snowmobile trips needs further analysis.

***Can I bring my own snowmobile into the park?***

Yes, as long as your snowmobile is BAT compliant.

***All non-commercially guided snowmobile operators are required to undergo safety training.***

***What about commercially guided trips – would all riders need to do the same training?***

Commercial guides take operators through safety training and are themselves certified as commercial guides, but at this time, the National Park Service does not require commercially guided snowmobile operators to undergo formal safety training.

***What is the speed limit for snowmobiles inside the park?***

35 MPH, except in developed areas and where posted lower.

***What if I can't take my trip when I planned to? Can I change the dates of my trip?***

All trip dates are final. You will be allowed to start your trip as planned, or transfer your trip to any alternate noncommercial guide you may have specified. If you are unable to use your scheduled dates, make sure to notify the park.

***Could unused allocations from commercial guides be transferred to non-commercially guided?***

At this time, the Supplemental Environmental Impact Statement does not allow for transfer between commercially guided and non-commercially guided transportation events.

***What will it cost to take a non-commercially guided trip?***

The following would be the costs for a non-commercially guided trip into the park under the preferred alternative.

Component	Cost	Payment Due
Lottery Application Fee	\$5.00/season	At time of application
Lottery Selection Fee	\$10.00/group/trip	At time of lottery award (permit awarded)
Yellowstone Snowmobile Education Certificate Program	\$10.00/snowmobile operator	At time of course initiation
Gate Entrance Fee*	\$15/machine/ one day \$20/machine /≥ 2 days	At the entrance gate

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\* Gate entrance fee will remain consistent with standard park entrance fee structure, and is subject to change

## **Sylvan Pass**

### ***How would the park manage Sylvan Pass?***

Sylvan Pass would be open for both motorized and non-motorized oversnow travel from December 22 through March 1 each year, consistent with the Sylvan Pass Working Group Agreement.

### ***Did the park conduct another Operational Risk Management Assessment (ORMA)?***

No. The park believes the two previous ORMAs were sufficient.

### ***What does it cost to operate Sylvan Pass in winter and how was this cost figure calculated?***

During the winter of 2011-2012, it cost the park approximately \$124,868 to operate Sylvan Pass.

### ***Will the NPS continue to mitigate avalanches?***

The park would continue to mitigate avalanches through a variety of techniques, including forecasting and helicopter and howitzer-dispensed explosives.

### ***Would administrative travel be allowed over Sylvan Pass if the pass were closed?***

No. If an action alternative is chosen in which Sylvan Pass is closed, National Park Service employees would not be allowed to use the pass for administrative travel until it could be safely opened in the spring.

## **Concessioner Oriented FAQs**

### ***Will there be a transition period?***

Yes. There would be a two-season transition period to prepare for the new winter use plan. Provisions of the 2009 to 2012 interim regulations would continue during this transition.

### ***How does Alternative 4 affect me?***

- You will be better able to respond to visitor demand by adjusting your snowmobile group sizes on busy days, and by allowing you to choose how you allocate your transportation events.
- You will have 5 years to ensure that all oversnow vehicle (OSVs) are best available technology (BAT) compliant. By the 2017-2018 season, snowmobiles and snowcoaches will be held to a 68 decibel (dBA) and 75 dBA sound standard, respectively. Snowcoaches will be subject to EPA engine and air quality emission standards, and service term limits for motor and emissions control equipment on converted snowcoaches, as well.

### ***How many operators per gate will be allocated transportation events?***

This is beyond the scope of this draft Supplemental Environmental Impact Statement (SEIS). At this time, we anticipate allocating events by concessions contracts for each entrance.

***How will transportation event allocations be distributed among concessionaires?***

This Supplemental Environmental Impact Statement (SEIS) does not include the concessions contract process. Because we have not yet determined how winter use will be managed, it would be pre-decisional to outline how contracts will be awarded.

***Will this affect me differently if I hold a commercial use authorization or a concessions contract?***

The park anticipates returning to 100 percent concessions contracts for winter transportation operators. Today, snowmobile operators are under commercial use authorizations (CUAs). Following publication of the final rule this fall, the park will begin the concessions contracting process.

***In awarding concessions contracts are you looking for operators that run both snowmobiles and snowcoaches?***

It would be pre-decisional for the park to outline a concessions contracting policy for winter use management before a final rule has been put in place. Once the rule is put in place, the concessions management program will work with concessionaires to create a detailed contracting policy.

***Can I trade transportation events with other operators?***

Operators would be able to trade transportation events in the same entrance, but could not trade transportation events between entrances.

***If weather conditions are poor, can operators use unused transportation events later?***

At this time, transportation events are capped at 110 events daily. Any allocations not used cannot be transferred to a later date. But, concessionaires will be allowed to trade transportation events within the same gate. Public comment to date has indicated a desire for the option to reschedule non-commercially guided snowmobile trips in the event of inclement weather. This is an option we're considering addressing in further development of the non-commercially guided snowmobile access program.

***What happens if I exceed the seasonal average of 7 snowmobiles per transportation event?***

You will receive an unsatisfactory reporting rating and/or lose your concession contract, temporarily or permanently.

***If I send in a group of 3 snowmobiles, does that mean I used an entire 'transportation event'?***

Yes.

***If concessionaires did not use any of their transportation events on a given day, would a zero oversnow vehicle (OSV) day count toward their seasonal average?***

Yes. The preferred alternative sets the seasonal average for snowmobile group size at 7 snowmobiles per group. If concessionaires did not run any groups on a given day, those days would allow for a larger group size on other days.



***How are events allocated between commercial and non-commercially guided events? How are they allocated between gates?***

Of the maximum of 50 transportation events allocated to snowmobile groups, 4 events have been allocated to non-commercially guided snowmobile groups – one event per entrance per day. That leaves 46 snowmobile events for commercial operators.

Commercial transportation events have been allocated by gate according to historic allocation patterns. Within a gate, operators will be able to competitively bid on set numbers of transportation events, but the details of the contracting process are outside of the scope of this plan and will be managed by the Concessions Program.

## **Adaptive Management**

***What is Adaptive Management?***

Adaptive management is based on the recognition that ecosystems are complex, and as managers, we will never fully understand these complexities. Adaptive management is a tool and a process that allows us to recognize these uncertainties and then monitor and learn from the actual impacts of a plan on the ecosystem. As a plan is implemented, if monitoring shows that the impacts to the park are not as we expected them to be, adaptive management allows us to learn from and modify or adjust management decisions. Adaptive management fundamentally relies on the involvement of the public and stakeholders to help first identify desired outcomes, select indicators or metrics to measure whether the desired outcomes are being met, and then develop strategies to adjust management actions if need be.

***How would adaptive management change winter use in the future?***

We may find that our monitoring data and progress in meeting our adaptive management objectives indicate that we should change the way we manage oversnow vehicle use in the park. Those changes could include, for example, requiring new sound or air emission technologies, increasing or decreasing the numbers of daily vehicle entries or transportation events allowed, establishing timed-entry requirements, adjusting speed limits, or closing or opening certain OSV areas, routes, or entrances.

***What is the initial approach to adaptive management?***

We will be engaging with stakeholders in the fall of 2012/winter 2012/13 to jointly determine which impacts we should closely evaluate. We will then work closely with these stakeholders over the next two years to develop an adaptive management strategy for winter use.

***Are the enhanced best available technology (E-BAT) standards subject to the adaptive management process?***

Because provisions for E-BAT standards for both snowmobiles and snowcoaches have been written into the draft Supplemental Environmental Impact Statement (SEIS) and later the rule, they will not be subject to an adaptive management framework prior to being implemented. That said our stakeholders can certainly cite E-BAT standards as an area for further study under the adaptive management framework they help to develop during the transitional period.

***How can you ensure that the adaptive management process will be beneficial in managing winter use?***

Adaptive management is a stakeholder driven process. Each of the proposed action alternatives provides time for us to engage with our stakeholders, identify key areas for further study, and gather baseline data to better understand how the final management plan will affect the park. Ultimately, our goal in adaptive management is to work with our stakeholders to decide how we best we should minimize impacts to the park while allowing for an appropriate level of winter use.