



PUBLIC COMMENT REPORT
Winter Use Plans, Draft Environmental Impact Statement
Yellowstone and Grand Teton National Parks and the John D. Rockefeller, Jr., Memorial Parkway

NATIONAL PARK SERVICE

This report summarizes public comments received by the National Park Service (NPS) for the Draft Winter Use Plans Environmental Impact Statement (DEIS), to plan winter visitation and recreation management in Yellowstone National Park, Grand Teton National Park (GTNP), and the John D. Rockefeller, Jr., Memorial Parkway. This long-term plan will guide the management of winter use in the parks, including snowmobiles, snowcoaches and possibly buses. It is intended to ensure that park visitors have a range of winter recreational opportunities in an appropriate setting, and that these do not impair or irreparably harm park resources or values.

BACKGROUND

Winter use management of Yellowstone and Grand Teton National Parks and the John D. Rockefeller, Jr., Memorial Parkway has been the subject of intensive study and public involvement for over a decade, comprising planning efforts, litigation, and National Environment Policy Act (NEPA) documentation. The following summarizes events that have occurred to date:

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| 1990 | The NPS completed an Environmental Assessment and Winter Use Plan for the parks. The Greater Yellowstone Coordinating Committee (including the NPS and U.S. Forest Service) subsequently began work on an interagency assessment of winter use issues (published in 1999 as <i>Winter Visitor Use Management: a Multi-agency Assessment</i>). |
| 1997 | The Fund for Animals filed suit against the NPS, resulting in a settlement that required the NPS to produce a Final Environmental Impact Statement (FEIS) and make a new decision on winter use. |
| November 22, 2000 | The NPS signed a Record of Decision on the FEIS. The decision eliminated recreational snowmobile and snowplane use from the parks by the winter of 2003-2004. |
| December 6, 2000 | The International Snowmobile Manufacturers Association sued the NPS asking that the decision eliminating snowmobile and snowmobile use be set aside based on NEPA process infractions. |
| June 29, 2001 | A procedural settlement negotiated by the Office of the Secretary of Interior became final. As provided in that settlement agreement, the NPS acted as lead agency to prepare a Supplemental Environmental Impact Statement (SEIS), with the State of Wyoming and nine others acting as cooperating agencies. |
| March 2002 | The NPS published the draft SEIS, and a 60-day public comment period followed during which the NPS received over 300,000 comment documents. |
| March 25, 2003 | The NPS issued a Record of Decision for the SEIS. |
| August 27, 2003 | The Proposed Rule based on the March 2003 Record of Decision was published in the <i>Federal Register</i> ; the public comment period closed on October 14, 2003. |

December 2003	The NPS published the new regulation based on the Record of Decision, but these actions were subsequently vacated and remanded to the NPS by the Washington, D.C., District Court.
February 2004	A federal court in Wyoming issued a preliminary injunction preventing the NPS from implementing the January 2001 regulation phasing out snowmobile use in the three parks. As a result, the parks issued emergency orders to comply with the court's order.
June 2004	The NPS began work on an Environmental Assessment (EA) for a Temporary Winter Use Plan for the parks, to guide management of winter use for the interim period (2004-2005, 2005-2006, and 2006-2007).
August 20, 2004	The NPS issued the EA for a 30-day public review and comment and received 95,006 comment documents.
September 7, 2004	The NPS published a Proposed Rule in conjunction with the EA, followed by a 30-day comment period that ended on October 7, 2004.
November 10, 2004	Implementing regulations for the temporary use plan, which remained in effect through the 2006–2007 winter season, were published in the <i>Federal Register</i> .
June 24, 2005	NPS published a Notice of Intent to prepare the Winter Use Plans Environmental Impact Statement and began a 60-day public scoping period beginning on July 24, 2005.
September 1, 2005	The scoping comment period ended, with stakeholders submitting a total of 33,365 comment documents.
Fall 2005	The Wyoming District Court upheld the validity of the 2004 temporary winter use plan, ruling on challenges filed by several litigants. The D.C. District Court denied the Fund for Animals and Federal defendants' motions for summary judgment, as well as a motion by the Greater Yellowstone Coalition enforcing the adaptive management standards of the 2003 decision.
September 2006	The Fund for Animals filed a motion renewing a previous request for summary judgment. That suit is still pending.
June 2007	The Wyoming District Court ruled on a suit from Save Our Snowplanes, upholding the validity of the temporary winter use plan and final regulation and their provisions prohibiting snowplane use on Jackson Lake.

CONTRACTOR ACTIVITIES and RESULTS

The comment period for the DEIS began on 03/27/2007 and ended on 06/05/2007. The NPS contracted with North Wind, Inc. (North Wind) to analyze public comments on the DEIS using the NPS Planning, Environment, and Public Comment (PEPC) system, a World Wide Web-based interface through which stakeholders submitted correspondence electronically. Stakeholders also sent paper documents directly to the NPS and provided oral and written comments at public meetings; these were forwarded to North Wind for hand processing (either scanning or data entry into the system).

North Wind received and analyzed 122,190 documents and considered the content of each through a coding process. North Wind reviewed and analyzed each document for concern statements; each concern statement was assigned a code. Codes represent text statements that, taken together, summarize the content of all similar comments received. The result is a profile for each comment document that reflects the content.

Number of Letters from Each State/Province/Country *

Number of Letters from Each State/Province	
USA	
AK	359
AL	512
AR	452
AZ	2797
CA	21246
CO	4774
CT	1695
DC	214
DE	239
FL	6333
GA	1778
GU (Guam)	6
HI	602
IA	847
ID	639
IL	4680
IN	1421
KS	716
KY	713
LA	442
MA	3503
MD	1984
ME	891
MI	3059
MN	2824
MO	1468
MS	204
MT	863
NC	2543
ND	82
NE	389
NH	843
NJ	3095
NM	1392
NV	771
NY	8435
OH	3406
OK	434

Number of Letters from Each State/Province	
OR	3641
PA	4352
PR	60
RI	427
SC	679
SD	156
TN	1381
TX	4519
UT	802
VA	2442
VI	18
VT	614
WA	5078
WI	2179
WV	261
WY	3497
AA (Armed Forces Americas)	5
AE (Armed Forces Europe)	68
AP (Armed Forces Pacific)	15
AS (American Samoa)	7
FM Federated States of Micronesia	1
MH (Marshall Islands)	1
UM (U.S. Minor Outlying Islands)	7
USA (other)	57
Canada	
AB (Alberta)	49
BC (British Columbia)	122
MB (Manitoba)	18
NB (New Brunswick)	9
NL (Newfoundland and Labrador)	7
NS (Nova Scotia)	12
NT (Northwest Territories)	3
NU (Nunavut)	4
ON (Ontario)	211
PE (Prince Edward Island)	2
QC (Quebec)	55
SK (Saskatchewan)	9
YT (Yukon Territory)	6
Canada (other)	1

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Other countries	
Baranya (Hungary)	1
Finland	1
Japan	2
Maharashtra (India)	1
Mendoza (Argentina)	1
North Holland (Netherlands)	1
NSW Australia	1

Number of Letters from Each State/Province	
PW Palau	1
Serbia	1
Songkhla (Thailand)	1
Spain	1
Sweden	9
United Kingdom	7
No or Incomplete Address	4,736
Total	122,190

* Data extracted from NPS PEPC system. Commentors enter their own information, so breakout is not restricted to 50 states. Some address corrections (Zip Codes, etc.) were incorporated before totals were calculated.

Comment Totals per Code

Code	Code Description	Total Comments
D-AE3.0	AFFECTED ENVIRONMENT	
D-AE3.4.1	Commentors state that summer visitors have greater impacts to resources than do winter visitors. Some state: * The large number of automobiles entering the park during summer months contributes more pollutants than do snowmobiles. * Summer visitors have negative impacts to wildlife and can travel without guides.	103
D-AE3.5	Public and Employee Health and Safety	
D-AE3.5.1	Commentors state NPS should continue avalanche control on Sylvan Pass. Some add: * The howitzer is safe and should continue. * Risk of injury is low. * Controlled slides prevent road closures/repairs. * Other areas are hazardous, too. * The park needs avalanche control capability. * Closure is really a budget, not a safety, issue. * DEIS overstates health and safety issues related to this concern. * Cody needs consistent avalanche management, not a hit-and-miss program.	562
D-AE3.5.1.1	Commentors state that there are alternative ways to manage the avalanche issue and/or other viable explosive delivery methods for Sylvan Pass, such as sound wave guns or fixed propane detonation devices on the mountain. Some commentors support: * Multiple delivery methods of avalanche control identified in the DEIS. * Future best available technologies. * Contracting avalanche control to private companies that are more willing to take risks.	15
D-AE3.5.1.2	Commentors make statements about continuing avalanche control. * Based on the Comey report NPS can't claim the risk on Sylvan Pass is unacceptable or can't be managed. * A specialized remote weather station should be put in place to provide real time data. * Helicopters increase costs yet make avalanche mitigation unpredictable and inconsistent and should only be used as a supplement to a primary artillery program. * NPS should act on mitigations recommended by NoHow, Inc. and Comey.	8
D-AE3.5.2	Commentors oppose continued avalanche control operations on Sylvan Pass because: * It is dangerous to staff. * It is unique in NPS - no other discretionary oversnow road in the US uses active avalanche control measures. * No other national parks use artillery for controlled avalanches. * It sets a dangerous precedent for other parks.	13,628
D-AE3.9.1	Commentors state that NPS needs to educate the public about the need for and process of protecting an environmentally sensitive park. Some state they should use partnerships with the surrounding communities, counties and states to expand educational opportunities regarding rules, user ethics, visitor safety and appreciation of the resources. Some commentors add that allowing too many off-road vehicles in national parks sends the wrong message about park protection.	911
D-AL2.0	ALTERNATIVES	
D-AL2.1	Alternative Management Techniques	
D-AL2.1.1.1	Commentors support Best Available Technology (BAT) requirements for snowmobiles used in the parks. Some commentors add that: * The snowmobile industry opposed the introduction of BAT machines, but they have reduced the negative impacts of snowmobiling.	18,835
D-AL2.1.1.2	Commentors oppose snowmobiles BAT requirements in the parks, or in certain areas. Some add: * Associated costs are too high. * Areas in GTNP, JDR, Flagg Ranch west on Grassy Lake Rd., Jackson Lake and/or CDST should be BAT exempt. * EPA Compliant (2007 or newer) models should be allowed on CDST and/or Jackson Lake. * A percentage of daily entries from Grand Junction to Flagg Ranch/Grassy Lake Road should be allowed to be 2006 or newer model.	1,226
D-AL2.1.1.2.1	Commentors state that 25 non-BAT EPA compliant and 25 BAT snowmobiles per day should be allowed on the CDST, with a group size limit of 10.	5
D-AL2.1.1.3	Commentors support Best Available Technology (BAT) requirements for snowcoaches used in the parks.	75
D-AL2.1.1.4	Commentors state concerns about the cost of purchasing BAT machines for winter fishing in Grand Teton Park without some guarantee that they can be used for multiple years. They suggest that NPS guarantee that approved BAT snowmobiles can be used for 5 to 10 years.	3

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D-AL2.1.1.5	Commentors state various reasons that NPS should not rely on BAT to reduce air pollution from mobile sources: *It does not establish progressive emission standards that snowmobile makers must meet. * Predicted BAT emissions are likely to be lower than actual levels during typical operation.	10
D-AL2.1.2.1	Commentors support guide requirements for snowmobiles used in the parks. Some make suggestions for modifying the program, such as allowing guides to train in the park prior to opening.	85,933
D-AL2.1.2.1.1	Commentors state that previous NEPA analyses and three-years of required guiding have clearly established that guided access is essential to control inappropriate behavior and protect resources; allowing unguided access would be illegal.	2
D-AL2.1.2.2	Commentors object to guide requirements for snowmobiles used in the parks. Some commentors add that: * High guide fees reduce winter visitation. * Guide requirements eliminate many potential visitors to accommodate a few who prefer solitude, at taxpayer expense. * The requirements displace local "real snowmobilers" in favor of tourists.	144
D-AL2.1.2.3	Commentors support limiting guided groups to 11: 10 snowmachines plus one guide. Some add that lower numbers increase costs, reduce flexibility, harm wildlife, increase congestion at attractions thus affecting visitor experience, and/or increase negative sound impacts. Some commentors add that larger groups are unproven and could cause negative impacts.	1,031
D-AL2.1.2.4	Commentors support some level of unguided access with trained/certified leaders. Some add: * Visitors could qualify to snowmobile without a commercial guide using their own machines * Trained visitors could lead their own groups * Unguided snowmobilers can use the park w/o impacts to others * Unguided access should be available through the East Entrance * Unguided groups should be smaller * All groups should be maximized in size * This addresses need for affordable access.	1,222
D-AL2.1.2.4.1	Commentors suggest requirements for certified guides: snowmobile experience, safety certificate, annual renewal, advance park reservations, BAT equipment, advance communication with park staff on current hazards and conditions, FRS radios for intragroup communication.	10
D-AL2.1.2.4.2	Commentors recommend requirements for snowmobile operators who are part of groups led by certified leaders: a valid drivers license and a certificate of completion of a safety course. Those who do not meet these requirements would need to be riders or go with a guided group.	5
D-AL2.1.2.5	Commentors request that NPS allow up to 50% of daily snowmobiles entries on the CDST and Grassy Lake Road to be used by commercial snowmobile outfitters.	83
D-AL2.1.3.1	Commentors support route restrictions for snowmobiles and/or snowcoaches used in the parks. Some commentors add that they favor closure of the CDST.	95
D-AL2.1.3.2	Commentors object to various snowmobile route restrictions and/or management of route restrictions. Some commentors add: * They object to closure of Sylvan Pass (East Entrance of the Park). Some state this restricts public access to the Park, impairs a cultural resource, and may diminish future opportunities. * If routes are closed, post notice signs in gateway communities. * NPS should provide better notice of grooming schedules for routes in the park so they will know what to expect.	4,561
D-AL2.1.3.2.1	Commentors state Sylvan Pass should stay open to oversnow motorized vehicles in the winter and be named the Craig Thomas Memorial Trail.	1
D-AL2.1.3.3	Commentors state support for closing Sylvan Pass/East Entrance in the winter. Some commentors add that: * Closure is consistent with NPS law and policy. * The costs of plowing do not justify the small visitor numbers. * Funds spent on plowing could be put to better use (hiring additional winter staff for enforcement and services). * The East Entrance has always had low visitor numbers.	13,658
D-AL2.1.3.4	Commentors request that the road from West Yellowstone to Seven-mile Bridge be opened to snowcoach operators only for preseason testing of vehicles.	5
D-AL2.1.3.5	Commentors state that the winter use decision should include continued and reliable grooming of the first 6 miles of the East Entrance Road for cross-country skiing and they request that NPS coordinate with Park County Nordic Ski Association to connect skiing opportunities available on the East Entrance Road with those available on Shoshone National Forest.	1

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D-AL2.1.4.1	Commentors support limits and/or low limits on snowmobiles allowed daily in the parks. Some commentors add that: * They favor daily over seasonal limits to manage winter use. * They object to flexible daily limits. * Low limits enable the park to recover from visitors during the winter. * Snowcoaches provide full access. * Some state the focus should be on monitoring the number of visitors not on the number of machines.	46,927
D-AL2.1.4.2	Commentors object to limits on the number of snowmobiles allowed in the parks daily and/or low limits for specific park entrances, routes, or features.	52
D-AL2.1.4.2.1	Commentors state that limits on the number of snowmobiles allowed in the parks are responsible for low visitor numbers through the East Entrance; thus, it is not fair to use low visitor use to justify closing this entrance. Some add that justifying the closure of Sylvan Pass because there is not enough traffic to justify the expense of grooming is a self inflicted and premeditated situation.	3,249
D-AL2.1.4.2.2	Commentors state that snowmobiles operating on the CDST between the east boundary of GTNP and Moran Junction should be exempt from daily limits, or a percentage should be allowed for through snowmobilers on the CDST or those headed west on Grassy Lake Rd. Some recommend setting a daily limit of 15 BAT and 25 non-BAT EPA compliant snowmobiles on the Grassy Lake Rd.-CDST corridor and allowing those snowmobiles to travel either east or west.	888
D-AL2.1.4.2.3	Commentors state that the lower numbers of snowmobiles in the parks over the last four years have resulted in improvements in park air quality, soundscapes and/or visitor experience. Some commentors commend the Park Service for these improvements.	81,204
D-AL2.1.5.1	Commentors state that rules relating to oversnow travel should be strictly enforced if snowmobiles are allowed in the parks. Some state that NPS law enforcement, rather than guides, be used to enforce rules. Some suggest those who break the rules should not be allowed to return to the park.	69
D-AL2.1.5.2	Commentors suggest that NPS take advantage of "fast pass," GPS speed tracking, and other new technologies to reduce staff requirements and/or improve enforcement.	5
D-AL2.1.5.3	Commentors discuss various potential snowcoach improvements, including small group size, less polluting vehicles operated only when full, more comfort, better handicap access, better reliability, and larger windows. Some commentors recommend scheduled shuttle service to accommodate longer stays or custom, nonmotorized recreation once inside the park.	18
D-AL2.1.6	Commentors make general statements in favor of snowmobile access to the parks, such as: * NPS should continue to allow snowmobiles in the parks (or, should not close the parks to snowmobiles). * NPS should not place any restrictions on snowmobiles. * Individual snowmobile travel provides the best way to experience the parks in winter.	1,194
D-AL2.1.6.1	Commentors state reasons for eliminating snowmobiles from the parks. * Legal and policy mandates including Interior Secretary Kempthorne's management direction and strategic plan. * Scientific findings. * The will of the people. * Philosophical considerations including that YNP was the first national park established in the world and the nation and the world look to Yellowstone for guidance in stewardship of resources.	2
D-AL2.1.7	Commentors express concern about one contractor having control of oversnow access to the park and state that NPS should consider issuing more than one concessions contract.	2
D-AL2.1.8	Commentors recommend that YNP, as the oldest national park, should be a leader in ecological management and/or sustainable recreation. Some state that given the scope of its responsibility for the resources and values entrusted to its care, NPS has an obligation to demonstrate and work with others to promote leadership in environmental stewardship.	36
D-AL2.1.9	Commentors support setting winter usage fees to offset the costs of keeping the park accessible to winter visitors	8
D-AL2.3	Alternatives Dismissed from Further Consideration	
D-AL2.3.1	Commentors state that NPS should designate an area inside or outside Yellowstone for snowmobiling, including off-trail or extreme snowmobiling.	32
D-AL2.3.2	Commentors ask NPS to reconsider the issue of snowplane operation on Jackson Lake.	3

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D-AL2.3.3	Commentors ask NPS to consider these management techniques: * Percentage of commercially guided snowmobiles does not exceed 70% of daily total. * Percentage of noncommercially guided snowmobiles ranges from 25% to 50% of daily total; leader must complete certification course. * Increase percentage of noncommercially guided snowmobiles in exchange for lower daily limits. * Manage CDST as a through trail with group and group size limits. * Manage snowmobile use by daily group limit.	4
D-AL2.3.4	Commentors recommend allowing snowmobile access during alternative periods (days or weeks), and/or varying periods of motorized/nonmotorized use.	2
D-AL2.5	Description of Alternatives	
D-AL2.5.3	Monitoring and Mitigation	
D-AL2.5.3.1	Commentors recommend that NPS work with and or subsidize local concessioners regarding replacement of older snowmobiles or snowcoaches, and inform them about updated emissions requirements and/or newer models.	6
D-AL2.5.3.2	Commentors ask NPS to communicate clearly with gateway communities and the public regarding its decision, any changes required by adaptive management strategies, and the transition. NPS should also provide adequate lead-time to adjust to new actions.	23
D-AL2.5.3.3	Commentors state that ongoing NPS monitoring and evaluation is vital for managing parks to achieve the NPS mission. Some add that superintendents must continually monitor and examine all park uses to ensure that unanticipated and unacceptable impacts do not occur. Some suggest NPS re-evaluate the impact of snowmobile use every 3-5 years.	10
D-AL2.5.3.4	Commentors state that NPS should continue to analyze the costs of keeping the East Entrance open during the winter. Some state NPS should continue to consider safe and cost-effective mitigative measures to keep the pass open, as well as alternatives that meet the criteria presented by the community and commercial operations that access this entrance.	36
D-AL2.5.3.5	Commentors state that NPS should convert oversnow vehicles to biodegradable lubricants that are better for the environment.	2
D-AL2.5.3.6	Commentors state that NPS should have constant opening and closing dates.	16
D-AL2.5.3.7	Commentors suggest that adaptive management be used to manage winter use. Some state that adaptive management thresholds for oversnow vehicles be flexible within plus or minus 20%. Some who support flexible daily entry limits state adaptive management could be used to address unwanted outcomes. Some add that keeping the East Gate open will provide greater flexibility if daily entries need to be redistributed among entrances.	11
D-AL2.5.3.8	Commentors state that suggested mitigation measures in the PDEIS should be implemented to reverse recent declines in visitation at the East Entrance. They cite the requirement for 100% commercial guides as the cause.	6
D-AL2.5.3.9	Commentors state that NPS is inappropriately applying the adaptive management concept, using monitoring data to increase oversnow travel levels but not to provide greater resource protection.	1
D-AL2.6	Action Alternatives	
D-AL2.6.1	Alternative 1: Continue Current Plan (Preferred Alternative)	
D-AL2.6.1.1	Commentors express support for Alternative 1 and/or continuing the current Temporary Plan with some modifications. Some commentors add that this provides a balance and public choice with respect to transportation.	206
D-AL2.6.1.2	Commentors state that they oppose Alternative 1, the Preferred Alternative. Some commentors add reasons for opposing it, such as: * It will reduce winter visitation as it has under the Temporary Rule * Snowmobile limits are too low to sustain winter visitation. * A group size of 17 snowmobiles is too large. * It favors the south and west gates, where the wealthy are.	999

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D-AL2.6.1.3	Commentors object to allowing 720 snowmobiles per day (Alternative 1/ Preferred Alternative). Some commentors add that this would: * Equate to an increase in the daily limit over current levels. * Adversely impact visitor enjoyment of peace and quiet. * Conflict with recommendations of park biologists. * Reverse progress made to air quality and increase emissions. * Adversely impact wildlife, such as bison, who use groomed trails to leave the protection of the park.	96,122
D-AL2.6.1.4	Commentors object to the Preferred Alternative because it: * Disregards aspects of the Comey report and impacts on NHRP structures. * Manipulates cost/visitor data. * Lacks an alternative based on the current management plan. * Would concentrate traffic where most animals live. * Would close a federal highway. * Would deprive individuals of motorized access. * Violates the Americans with Disability Act by restricting East Gate access.	3,160
D-AL2.6.1.5	Commentors object to the Preferred Alternative because there has been no new information to persuasively reject the 2000 EIS and its impairment finding, or the 2001 rulemaking, to ban all recreational snowmobiling in the park. They state the DEIS contains no new information that warrants selection of any alternative other than Alternative 2.	10
D-AL2.6.2	Alternative 2: Snowcoaches Only	
D-AL2.6.2.1	Commentors support Alternative 2 and/or eliminating recreational snowmobiling; some add: * Fewer snowmobiles have improved park conditions. * Seven former NPS directors support it. * Snowcoaches are practical, efficient, safer, environmentally responsible, adaptable to low snow levels, and they benefit gateway communities and provide the best air quality of all alternatives. * Some snowmobilers violate rules. * Only handicapped individuals should be able to use them.	88,962
D-AL2.6.2.1.1	Commentors state that NPS should expedite implementation of Alternative 2. Some commentors add that: * Alternative 2 balances public access with resource preservation. * Strict limits on snowmobiles should remain in place during transition.	72,312
D-AL2.6.2.1.2	Commentors state NPS should eliminate recreational snowmobiling in the parks because it takes the focus away from the parks and puts it on high-performance machines. Some commentors add that managing snowmobile operations with tight budgets takes staff away from important visitor education and park operations.	289
D-AL2.6.2.1.3	Commentors support Alternative 2 because: * It upholds laws and policies providing the basis for a sustainable decision. * It meets the agency's responsibility to protect and perpetuate clean air in the parks to the greatest degree possible. * It provides motorized access with less noise and ensures visitors an opportunity to experience YNP's winter sounds and quiet. * It addresses NPS's legal responsibilities toward wildlife and its scientists' recommendations.	1
D-AL2.6.2.2	Commentors oppose Alternative 2 for a variety of reasons: * It does not provide an adequate winter experience for the visitor. * Snowcoaches are not reliable and cannot provide access to the whole park. * Snowcoaches negatively impact groomed roads. * Snowcoaches alone cannot sustain winter visitation.	305
D-AL2.6.3.1	Commentors oppose Alternative 3 for a variety of reasons: * It does not provide an adequate winter experience for the visitor. * Grooming is essential for park management and protection.	275
D-AL2.6.3A	Alternative 3a: Eliminate Most Oversnow Roads / Road Grooming	
D-AL2.6.3A.1	Commentors express support for Alternative 3a and/or eliminating most oversnow roads in the parks.	30
D-AL2.6.3A.2	Commentors state that they oppose Alternative 3A; some add that: * It is too restrictive.	2
D-AL2.6.3B	Alternative 3b: Close Oversnow Roads - No Action	
D-AL2.6.3B.1	Commentors express support for Alternative 3b and/or banning of recreational snowmobiles and snowcoaches in the parks. Some commentors add that: * This is the only alternative that would treat all visitors fairly, not just those who can afford the high cost of snowmobile, snowcoach, or commercial transport. * Continuing to allow snowmobile use in the parks inhibits the development of snowmobiling alternatives elsewhere.	68

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D-AL2.6.3B.2	Commentors state that they oppose Alternative 3B. Some commentors add that: * It is too restrictive. * It should not be the environmentally Preferred Alternative because it does not provide access without resource degradation.	10
D-AL2.6.3B.3	Commentors object to Alternative 3B as the Environmentally Preferred Alternative. They state the DEIS acknowledges Alternative 3B "is not as effective in sharing life's amenities as the other alternatives because of the lack of oversnow vehicle access..." They state Alternative 2 would yield lower impacts to YNP's air quality, soundscapes and wildlife than continued snowmobile use while providing motorized public access.	1
D-AL2.6.4	Alternative 4: Expand Recreational Use	
D-AL2.6.4.1	Commentors express support for Alternative 4 and/or elements of it, including some or all of the following: * Expanding recreational use by raising daily snowmobile limits. * Allowing 25 percent unguided or noncommercial entries. * Reopening all Yellowstone side roads to snowmobile visitors. * Allowing 100 snowmobiles per day on Jackson Lake, which is consistent with past use levels. Some commentors add that it balances resource protection with sufficient access.	3,239
D-AL2.6.4.2	Commentors recommend unlimited snowmobile operation in the parks, reducing impacts by asking the snowmobile industry to produce a battery-powered machine.	4
D-AL2.6.4.3	Commentors state that they oppose Alternative 4. Some commentors state reasons why they oppose it: * It does not balance park protection with visitor access. * It includes an option for private snowcoaches. * There should be no preferential treatment for those who own their own snowcoaches.	3
D-AL2.6.5	Alternative 5: Provide for Unguided Access	
D-AL2.6.5.1	Commentors express support for Alternative 5 and/or allowing 20 percent of daily snowmobile entries to be unguided.	52
D-AL2.6.5.2	Commentors state that they oppose Alternative 5. Some commentors add that the limits are too low.	1
D-AL2.6.6	Alternative 6: Mixed Use	
D-AL2.6.6.1	Commentors express support for Alternative 6 and/or allowing wheeled vehicle access to Yellowstone's interior in addition to snowmobiles and snowcoaches.	10
D-AL2.6.6.2	Commentors oppose Alternative 6 for a variety of reasons: * It does not provide an adequate winter experience for the visitor. * It would be detrimental to effective management of the park interior. * It is too expensive. * It would be logistically unrealistic because visitors could not cross the park in one type of vehicle. * It would cause air quality impairment at West Yellowstone. * No plowing of roads should occur in the park.	271
D-AL2.6.6.3	Commentors state that they support use of alternative fuels on commercial wheeled vehicles to reduce air impacts in the parks.	7
D-EC4	ENVIRONMENTAL CONSEQUENCES	
D-EC4AQ	Effects on Air Quality and Air Quality-Related Values	
D-EC4AQ.1	Commentors state that snowmobiles have negative impacts on air quality, and/or object to their negative impacts. Some commentors add that snowmobiles pollute because they lack the emission controls that automobiles have. Other commentors state that the DEIS omits the fact that BAT snowmobiles have lower emissions per person than snowcoaches.	96,698
D-EC4AQ.2	Commentors state that snowcoaches have negative impacts on air quality, and/or object to their negative impacts. Some commentors add that snowcoach tailpipe emissions are unregulated.	30
D-EC4AQ.3	Commentors state that Section 3.4 of the DEIS shows that NAAQS standards were not violated even by older snowmobiles, and that BAT has reduced pollution even more.	2
D-EC4G	General Impacts	
D-EC4G.1	Commentors state that snowmobile use has negative impacts on park resources.	19,679
D-EC4G.2	Commentors state that snowmobile use contributes to global warming and worldwide climate change due to carbon emissions.	198
D-EC4G.3	Commentors state that snowmobiling does not result in negative environmental impacts. Some commentors state that there is no proof that regulated winter activity harms anything in the parks.	78

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D-EC4G.4	Commentors state that snowcoach use has negative impacts on protected park values.	7
D-EC4SE	Effects on the Socioeconomic Environment	
D-EC4SE.1	Commentors state that closure of the East Entrance in winter as described in the Preferred Alternative would have negative socioeconomic impacts on east side gateway communities and/or: * Eventually end visitor use through this entrance * Threaten winter businesses and uses on the North Fork of the Shoshone River * Impede growth in the Cody area.	3,319
D-EC4SE.3	Commentors state that keeping the park open to snowmobiles could make it lose its natural appeal and/or have negative socioeconomic impacts (i.e., decreased tourist dollars) through decreased visitation while positive socioeconomic impacts could result from snowmobile restrictions (less pollution will attract more visitors). Some commentors add that gateway communities have already or will benefit from snowcoach operations and/or diversifying winter use.	119
D-EC4SE.4	Commentors state that managing snowmobile use is extremely costly on a per capita basis and is a waste of tax dollars.	35
D-EC4SE.5	Commentors state that the parks are important economically to surrounding counties, and citizens expect reasonable access to the parks.	94
D-EC4SE.6	Commentors state that negative socioeconomic impacts on gateway communities, concessioners and guided snowmobile outfitters/users have resulted from snowmobile restrictions and/or Park Service/Federal Government misinformation and other actions. Some commentors add that these actions have given a false impression that visitors do not want to use the East Gate in winter.	123
D-EC4SE.7	Commentors state that there has been a decline in snowmobile use under the temporary rule, reducing entrance revenues by at least \$500,000 annually.	4
D-EC4SE.8	Commentors state that revenue from snowmobilers provides capital required to maintain the park so that it may be enjoyed by all users in all seasons.	12
D-EC4SE.9	Commentors state that despite the drop in East Gate visitors, the Cody economy continues to grow; Sylvan Pass closure would not have serious negative impacts.	2
D-EC4SE.10	Commentors state that evidence contradicts the claim that banning snowmobiles will have negative socioeconomic impacts on gateway communities. They state recent tax data indicates snowmobile use and overall winter use have declined but it has not detectably impacted economies of surrounding counties.	3
D-EC4SE.11	Commentors state that snowmobile use has increased for the past few years, even faster than snowcoach use has.	2
D-EC4SS	Effects on the Natural Soundscape	
D-EC4SS1	Commentors state that snowmobiles in the parks destroy the natural winter soundscape.	115,049
D-EC4SS2	Commentors state that snowcoaches in the parks have negative impacts on the natural winter soundscape.	18
D-EC4SS2.1	Commentors state that with snowcoaches only (Alternative 2) the natural soundscape will be present over more acres a greater percentage of the time, thereby removing this impairment to park resources in the shortest possible time.	1
D-EC4SS3	Commentors state that the DEIS conclusively demonstrates that continued snowmobile use with BAT has no adverse impacts on soundscapes; with BAT machines, sounds are not intrusive, and the backcountry offers a natural soundscape.	7
D-EC4SS3.1	Commentors state that most visitors traveling along park roads or visiting developed areas expect to hear oversnow vehicle noise and so that noise won't be a significant deterrent to their visit. They state NPS should include Management Policy 8.2.2 in Section 3.7.1 which states park visitors expect to hear "sounds associated with people visiting their parks....."	5
D-EC4VE	Effects on Visitor Experience	
D-EC4VE.1	Commentors state that snowmobile use has negative impacts on visitor experience.	47,466

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D-EC4VE.2	Commentors state that closure of the East Entrance would have negative impacts on visitor experience because it provides the widest range of winter use options. Some add that closure would not provide park visitors, local communities, and others an assurance that winter use management will remain fairly stable and predictable over the long-term and would not facilitate an environment in which visitors can make informed decisions about visiting the parks.	126
D-EC4VE.3	Commentors state that requiring snowcoach travel has negative impacts on visitor experience, and visitors do not like them. Some commentors add that improvements such as providing more wildlife stops could help. Some state they do not provide access to same areas of the park that snowmobiles do.	7
D-EC4VE.4	Commentors state that snowcoaches enhance visitor experience and/or are consistent with tour industry reports that groups prefer interpretive services and low environmental impacts. Some question the basis for stating in the DEIS that under Alternative 2, "... opportunities to view wildlife and scenery may decrease."	19
D-EC4VS	Effects on Public and Employee Health and Safety	
D-EC4VS.1	Commentors state that snowmobile use has negative impacts on safe working conditions for park employees and/or the health and safety of employees and visitors.	72,840
D-EC4VS1.1	Commentors state that safety is one of the arguments NPS uses in favor of requiring commercial guides for all snowmobiles, but there is no directly comparable basis to conclude unguided access will be unsafe because it hasn't been allowed or tried on an experimental basis since implementation of managed winter use in 2003.	5
D-EC4VS.2	Commentors state that it would be irresponsible to allow skiers and snowshoers to use Sylvan Pass if it is closed and not groomed for winter use, due to the health and safety risks and liability to the park.	265
D-ECVS.3	Commentors state that snowmobile use does not have negative impacts on safe working conditions for park employees and/or the health and safety of employees and visitors.	7
D-EC4WH	Effects on Wildlife	
D-EC4WH1	Commentors state that snowmobiles have negative impacts on park wildlife. Some commentors add that animals are already under stress trying to survive the harsh winter.	43,080
D-EC4WH1.1	Commentors state that snowmobiles do not have negative impacts on park wildlife, including bison. Some state that possible adverse effects from oversnow vehicle use will always be insignificant compared to other variables.	87
D-ED	EDITORIAL COMMENTS	
D-ED1	Commentors recommend a change in Chapter 11, Section 2.5.4, p. 30, by replacing bullet 1 with the following text: "Beginning in the 2011-2012 season, all snowcoaches must meet ... having EPA Tier 11 emissions control equipment."	1
D-ED2	Commentors ask NPS to clarify the process used to determine the overall seasonal entry limit for commercial snowmobiles (p. 51 of the DEIS).	1
D-ED3	Commentors ask NPS to clarify why snowmobiles would still be allowed "from the east boundary of GTNP to Buffalo Fork River" in the alternatives whereby the CDST is eliminated (2 and 5). It is unclear what the purpose for this continued access would be in the absence of the balance of the CDST.	1
D-ED4	Commentors question data on pp. 79-81 of the DEIS that, they say, gives the false impression that visitation at some locations is up over the years depicted by the table. They add that the NPS manipulated these data to reach a misleading conclusion. Commentors also request that Sec. 3.8.5 be clarified to state that there has been a net decrease of over 47 percent in Yellowstone's visitation.	1
D-ED5	Commentors request the following change on p. 191: Revise "new standards will begin to take effect with the 2006 model year" to clarify that EPA- regulated snowmobiles have already been in the marketplace for two full years, and are now entering their third year of sales.	1
D-ED6	Commentors, representing the International Snowmobile Association, submit a list of 65 editorial comments on specific pages in the DEIS.	1

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D-ED7	Commentors request that NPS do a better job of explaining park budgets and priorities to help the public understand the reasons for identifying Alternative 1 as the Preferred Alternative.	1
D-ED8	Commentors state that the 2006 NPS Policy on Air Quality is omitted from the "Regulatory and Policy Overview" on air in the DEIS (p. 82) and NPS should ensure that the Final EIS includes the policy.	2
D-ED9	Commentors recommend that the desired condition for Health and Safety in the DEIS p. S-4, Table S-1, that states, "The safety and health of persons, and protection of property, are ensured by identifying and preventing potential injuries from recognizable threats" be rewritten to state something like, "The safety and health of persons will be provided to the extent possible by..."	5
D-ED10	Commentors state that NPS needs to do a better job of describing the significance of the park's fundamental resources and what is at stake with respect to potential impacts.	2
D-ED11	Commentors ask NPS to clarify if an "episode" is an avalanche control mission in the discussion of avalanche hazard mitigation on p. 97, and if the average includes spring avalanche control missions.	5
D-ED12	Commentors ask NPS to provide definitions of terms in Table 4-40, p. 207, to explain what they mean in relation to avalanche hazards.	5
D-ED14	Commentors state that the Final EIS should disclose that of the six alternatives analyzed, Alternative 2 would "perpetuate the best possible air quality" in Yellowstone. The Final EIS should also disclose in non-technical language readily understandable by decision makers and the public that Alternative 1, because of its emphasis on continued snowmobile use, would result in five times greater carbon monoxide emissions and 17 times greater hydrocarbon emissions than Alternative 2.	1
D-ED15	Commentors state that NPS needs to do a better job of describing the significance of the park's fundamental resources and what is at stake with respect to potential impacts.	1
D-PN1	PURPOSE AND NEED	
D-PN1.1	Commentors describe what they consider to be NEPA process violations during preparation of the EIS: * It did not follow federal NEPA guidelines because all reasonable alternatives were not explored and objectively evaluated. * The Preferred Alternative fails to consider multiple factors. * NPS did not adequately consider the impacts to the Cody community during scoping.	3,142
D-PN1.1.1	Commentors state that selection of the Preferred Alternative violates NEPA because it will result in unacceptable impacts and significant impairment of the parks' resources. They add that allowing 720 snowmobiles into the park per day is arbitrary and capricious.	3
D-PN1.1.1.1	Commentors state that there are NEPA deficiencies and flaws that do not support selection of the Preferred Alternative, including: * The Preferred Alternative appears to be predetermined. * A lack of decision criteria. * A cumulative effects analysis that provides inadequate treatment of climate change.	5
D-PN1.1.1.2	Commentors state that implementation of the proposed Preferred Alternative would be in violation of laws and policies. They state these violations apply to potential impacts, inadequately acknowledged and considered in the Preferred Alternative, to 3 primary and critical resources in the parks - air quality, natural soundscapes or natural quiet, and wildlife.	1
D-PN1.1.2	Commentors state that NPS has no choice but to complete the DEIS and previous NEPA actions because they are ordered by the courts as the result of litigation by parties on all sides.	1
D-PN1.1.3	Commentors point out concerns with the way NPS has proceeded with the NEPA process since 1997. * They have not followed an informed process, nor considered all factual data provided, nor properly included cooperating agencies in the process. * Many of the decisions and pending decisions have not followed law.	1
D-PN1.2	Purpose and Need for Action	

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D-PN1.2.1	Commentors state that previous studies have already evaluated the impacts of snowmobiles and/or the public has previously expressed their opinion against snowmobiles and for a transition to snowcoaches. Some commentors add that: * A snowmobile phaseout is consistent with federal law and NPS policy. * The EIS is unneeded and/or wastes money.	114,619
D-PN1.2.2	Commentors state that visitors have already given up their cars to ride in coaches in some Western parks such as Yosemite, and should be willing to give up some level of access to protect Yellowstone in the winter.	34
D-PN1.4	Scope of Analysis: Range of Alternatives Considered	
D-PN1.4.1	Off scope/no comments: Commentors make statements that are off scope relating to topics such as: * The NPS Newsletter. * Areas outside the park jurisdiction or boundary. * Concessioner breach-of-contract issues. * Surreptitious planning to plow Cooke Pass to Cooke City.	134
D-PN1.5.2	Commentors make statements about impact topics dismissed from detailed analysis, including soils and vegetation.	11
D-PN1.5.2.1	Commentors state that snowmobiling wastes scarce petroleum resources. Some commentors add that eliminating recreational snowmobiling would set an example of how to conserve nonrenewable energy.	142
D-PN1.6	Public Involvement	
D-PN1.6.1	Commentors request that their names not be added to NPS mailing lists.	18,748
D-PN1.6.2	Commentors state that NPS should consider the comments of all park stakeholders, not just the vocal minority or commercial interests. Some commentors add that: * NPS should not take actions that benefit the few to the detriment of others. * Snowmobiles impact the ability of the majority to enjoy the park without pollution, noise, and other associated negative impacts.	14,100
D-PN1.6.3	Commentors state that NPS should consider the comments of all park stakeholders, including those who support snowmobiles access to Yellowstone. Some commentors add that the debate is not about preservation, but about an elitist group that wants to eliminate a behavior they do not like.	99
D-PN1.6.4	Commentors, who object to closure of Sylvan Pass, state that they support a confrontational approach to influence decision-making if NPS does not honor their request. This would include actions such as a local picket or camp out on the East Entrance with complete media involved, with participants risking jail time if needed.	1
D-PN1.6.5	Commentors make statements about the public comment process and/or NPS messages. * Stakeholders appreciate the process. * The initial decision to limit public meetings to Cody and West was flawed; it diminished the value of comments from other meetings. * NPS says NEPA is not a vote, but the message is that public preferences don't count. * NPS statements convey form letters aren't as important as non-forms. * The DEIS did not adequately address agency comments on the PDEIS.	11
D-PN1.7	Major Issues	
D-PN1.7.1	Commentors state that Yellowstone and Grand Teton are unique and therefore people should snowmobile on other public lands. Some state that snowmobile use is not "uniquely suited and appropriate" to the parks and given that there are thousands of miles of trails and acres on public lands adjacent to the parks, snowmobilers can use these lands, consistent with the 2006 Management Policies.	685
D-PN1.7.2	Commentors recommend that NPS promote or groom more trails for nonmotorized activities. Some commentors add that they: * Have fewer negative impacts on the experiences of other visitors * Promote fitness in accordance with compliance with Executive Order 13266 * Are better for the environment * Can also generate revenue for area communities.	53,696
D-PN1.7.3	Commentors state that the DEIS needs to consider the closure of Sylvan Pass as a major issue. Some commentors add that NPS: * Depends on its concessioners and surrounding communities for visitor support and access. * Should ensure that its policy actions consider the interests of these parties and should do a better job of communicating with concessioners about research and new technologies.	48
D-PN1.7.4	Commentors state that it is not the responsibility of the National Park Service to maintain the economies of gateway communities.	76

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D-PN1.7.5	Commentors state that NPS should manage visitor use and access in a way that is fair to all parties and/or meets the needs of local stakeholders as well as visitors from other areas.	54
D-PN1.8	NPS Mandates	
D-PN1.8.1	Commentors state that the mission of NPS is to conserve the parks and their associated values (e.g., wilderness, wildlife, pristine nature, peace and quiet, solitude) and leave them unimpaired for future generations. Some commentors add that * Snowmobile use in national parks conflicts with this mission. * Multiple mandates require NPS to fulfill this mission: public laws, executive orders and directives.	69,331
D-PN1.8.1.1	Commentors state that NPS has no responsibility to provide access to a range of appropriate activities. Some commentors add that the statement in Table S-1 (Desired Conditions/Visitor Access) is without legal or policy basis and/or is a false assumption upon which to base the DEIS.	13
D-PN1.8.1.2	Commentors state that the decision on winter use is especially important because it will establish a precedent for how the 2006 NPS Management Policies will be implemented throughout the Park Service system.	17
D-PN1.8.2	Commentors state that the mission of NPS is to provide opportunities for the public to enjoy the parks. Some commentors add that: * The parks belong to the public. * It is a public park, not a pristine wilderness and should not be treated as such (i.e., snowmobile access should continue). * Visitors should have access without using commercial businesses.	257
D-PN1.8.3	Commentors state that a balance between all users should be the goal and/or is needed to protect the resources. Some state that snowcoaches represent the best compromise because they allow motorized access while protecting the park's resources.	28,301
D-PN1.8.3.1	Commentors state that conservation is to be predominant when the choice is to be made between use and protection of the resources.	32
D-PN1.8.4	Commentors state objections to perceived efforts by the Administration and/or the NPS to rewrite basic park policy to promote recreation over park protection. They cite examples such as: * Defining impact levels in ways that depart from decades of NPS policy. * Disregarding the YNP enabling act and existing NPS snowmobile regulations.	834
D-PN1.8.5	Commentors state that NPS guidelines on resource protection require park managers to select forms of transportation that have the fewest impacts.	684
D-PN1.8.6	Commentors note that new Clean Air Act Management Policies require the National Park Service to maintain the best possible air quality in the parks.	27,521
D-PN1.8.7	Commentors state that historical use of snowmobiles has indicated this use was acceptable because park managers must not allow uses that would cause unacceptable impacts; therefore Alternative 1 will not result in unacceptable impacts or impairment of park's resources.	1
D-PN1.8.7.1	Commentors state that the unacceptable impacts standard is a misstatement of law and recreational uses can only be prohibited if the use causes impairment of park resources.	1
D-PN1.8.8	Commentors state that the 2001 ban on snowmobiles was forced through by political considerations without studies or information to justify the change from previous policy.	2
D-PN1.8.9	Commentors state allowing limited unguided and/or non-commercially guided access will better meet the NPS Policy for Visitor Use that states, the Service will, to the extent practicable, afford visitors ample opportunity for inspiration, appreciation, and enjoyment through their own personalized experiences... They add that under the Preferred Alternative there is no opportunity for snowmobile visitors to enjoy YNP through their own personalized experience.	5
D-PN1.9.1	Commentors recommend that NPS coordinate the EIS with the Grand Teton Transportation Plan EIS and consider both together.	2
D-RVC4.4	Commentors state that the DEIS failed to evaluate the cumulative impacts of all federal actions on the economy of the Cody community and other surrounding areas and on visitor access and circulation if the East Entrance is closed.	6

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D-RVC4.4.1	Commentors state the cumulative analysis section is insufficient because: * Scoping did not properly cover concerns about the Cody gateway community. * Admissions from Section 4.5 note the futility of visitation trend data. * There are outstanding criticisms of the economic data. * There is no analysis of future scenarios for Cody and Park County. * It neglects to specifically discuss cumulative effects from ongoing changes in NPS policy including the temporary ruling in 2003.	5
D-SC1	NEW INFORMATION THAT COULD CHANGE THE PROPOSAL	
D-SC1.1	Commentors state that NPS should use the data from Dr. Bishop's 2006 "In Use Emissions" for modeling in the Final EIS.	1
D-SC2	ADEQUACY OF ENVIRONMENTAL ANALYSIS	
D-SC2.1	Commentors state that the EIS analysis does not consider sustainability of the alternatives/plan in terms of factors such as increasing population and energy consumption. One commentor states that NPS needs to complete a supplement to the DEIS to comply with 40 CFR 1502.16 (e)(f), which requires an energy evaluation for the proposed action.	5
D-SC2.2	Commentors state the soundscape analysis is flawed. It calculates impacts based on total park area rather than the area to which visitors have access, moving the emphasis on noise impacts away from the most visited areas, where snowmobile noise has exceeded the previous definition of major adverse impacts even with an average of 250/day, where noise problems would increase with 720 snowmobiles and where NPS models show, attractions would be quieter with a greater emphasis on snowcoaches.	10
D-SC2.3	Commentors state that the analysis of air quality in the EIS is incomplete because it is based on modeling rather than the real-time data NPS collected over the three-year period of the Temporary Winter Use Plan. This data collection was a cited reason for adopting the Temporary Plan. Commentors add that the EIS failed to disclose conflicting scientific data.	10
D-SC2.4	Commentors commend NPS for producing a document that is well written and based to a much greater degree on facts than previous documents. They add that NPS now has the best information available and should use it to proceed with a decision.	10
D-SC2.4.1	Commentors state that analysis in the DEIS is flawed because it fails to use the best available science to drive the development of the Preferred Alternative.	10
D-SC2.5	Commentors state that the DEIS fails to consider the danger of avalanches on Talus Slope, which demonstrates an inconsistent, park-wide analysis.	6
D-SC2.5.1	Commentors question whether the DEIS meets its legal mandate to disclose cumulative impacts by not including discussions on either the Talus Slope avalanche hazard or possible avalanche mitigation operations or both as "past, present, or reasonably foreseeable future actions...."	5
D-SC2.6	Commentors state that the DEIS fails to analyze properly the impacts of snowmobile restrictions on the sustainability of winter visitation.	8
D-SC2.7	Commentors state that the analysis in the DEIS fails to fully consider Big Sky as a gateway community.	1
D-SC2.8	Commentors suggest that the DEIS lacks a discussion of the parks' weather reporting capability and how it could be improved to reduce operating and maintenance costs.	1
D-SC2.9	Commentors state that no clear and significant data was provided to justify the decision to close the East Entrance.	9
D-SC2.9.1	Commentors state closure of East Entrance is a major action and warrants a more focused look at the communities/counties that will be directly impacted. Some add that the DEIS does not fully capture economic impacts to Park County and Wyoming and the NPS did not sufficiently modify the economic analysis by Duffield and Neher (2006) or consider new economic analyses using unbiased data in the DEIS.	5
D-SC2.10	Commentors state that the analysis of cumulative impacts in the DEIS is inadequate because it fails to clarify the disparity of cumulative effects among alternatives.	9
D-SC2.11	Commentors state that the Final EIS needs to consider nonimpairment to park wildlife, especially with respect to avalanche control on Sylvan Pass.	2

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D-SC2.12	Commentors express concern about inconsistencies in the health and safety analysis for alternatives that would allow non-motorized travel over Sylvan Pass. They question the lack of safety analysis and cumulative effects analysis for alternatives that continue to allow ski and snowshoe use of the South Entrance and East Entrance Road after the balance of the park's roads close to winter operations.	5
D-SC2.13	Commentors state that the DEIS fails to provide data to substantiate the statement that there is "less idling by guided groups." They state that it is a rationalization to justify requiring commercial guides for all snowmobiles and add that if NPS has quantifiable scientific data to justify the statement they should include it in the Final EIS.	5
D-SC2.14	Commentors question how NPS can frame law enforcement statistics on p. 95, specifically decreases in the number of citations issued to snowmobiles, as supportive of guided vs. unguided snowmobilers.	5
D-SC2.15	Commentors state that the cumulative impact of each parameter of health and safety (listed on p. 207) should be assessed separately for employees versus the public (as was done in the 2000 FEIS).	5
D-SC2.16	Commentors state the lack of analysis concerning climate change is a serious flaw in the NEPA document. They add that: * In dismissing climate change from the detailed analysis, NPS contradicts thinking of leadership within its own agency. * Without an assessment of global climate change and its related reduced snowfall and accumulation, the DEIS falls short of taking a hard look at one of the foundation environmental impacts.	5
D-SC3	ACCURACY OF INFORMATION IN THE EIS	
D-SC3.1	Commentors state that the EIS figures for historic snowmobile use on Jackson Lake should consider past use of snowplanes, and that combining snowplane and snowmobile numbers into a general motorized use category would be more accurate.	3
D-SC3.2	Commentors question adequacy of technical analysis related to population dynamics models of the Yellowstone bison (Borowski 2006, Borowski et al. 2006, Bruggeman 2006, Fuller 2006, Wagner et al. 2006, Gates et al. 2005).	1
D-SC3.3	Commentors state that information in the DEIS about CDST visitation (Table 2-15) conflicts with data provided by the NPS Public Use Statistics Office.	2
D-SC3.4	Commentors question the accuracy of the sound analysis in the DEIS: * The sound analysis needs to be updated to use the procedure revised in 2003 by the Society of Automotive Engineering. * The noise impact differences between Alternatives 1 and 2 appear to be underestimated. * There is no compelling data to support the contention that 100% commercial guiding decreases percent time audible.	16
D-SC3.5	Commentors state that the DEIS underestimates the effect of snowmobile emissions on air quality because it assumes that all snowmobiles in the parks will be four-stroke.	1
D-SC3.6	Commentors question the analysis of impacts on wildlife because it appears they are the same for Alternatives 1 and 2.	1
D-SC3.7	Commentors question the analysis of socioeconomic impacts. * They state that NPS uses recent winter visitation data to result in smaller socioeconomic impacts but they should be using historic levels before management reduced visitation. * They state the use of IMPLAN is inappropriate.	6
D-SC3.8	Commentors state that considering Sylvan Pass as backcountry in these alternatives is inconsistent with NPS policy.	5
D-SC3.9	Commentors state that the description of oversnow vehicle visitation trends for the South Entrance is incorrect. In the last 3 winters, snowmobile use has increased from 70% to 74%, not declined from 87% to 72.3% as stated in the DEIS, p. 143. They state that the Winter Visitation Data section clearly shows that snowmobiles remain the most popular means among the visiting public to access YNP.	5
D-SC3.10	Commentors state the DEIS purposely overstates the safety effects for Alternatives 4 and 5 compared to previous analyses to justify closing Sylvan Pass in the Preferred Alternative. They question what conditions have changed since 2004 to warrant avalanche hazards being considered a "major, adverse" impact, especially to visitors. In the previous analysis they were described as "moderate, adverse."	5

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D-SC3.11	Commentors question the inclusion of wildlife as a selection criterion and suggest NPS not consider wildlife effects in its determination of appropriate oversnow vehicle effects. They state that the DEIS assumes since the protection of wildlife is an emotional public issue, it automatically warrants inclusion as a selection criteria. They add that they find no logical connection to wildlife effects and oversnow vehicle use.	5
D-SC3.12	Commentors express concern about the wildlife analysis. * They object to the statement that there is no difference in wildlife impacts between Alternative 1 and allowing 120 snowcoaches per day even though the latter would involve 1/6 as much traffic. * They state NPS modified the wildlife Desired Condition and Definition of Impacts to Wildlife and now link the desired condition to whole population consequences although the 2003 SEIS stated NPS' responsibility to minimize adverse impacts to individuals.	1
D-SC3.13	Commentors disagree with the accuracy of NPS assertions in the "Summary and Comparison of Impacts by Resource" that there is no difference in impacts to YNP's soundscapes between 720 snowmobiles/day and the snowcoach alternative. They add these statements are misleading because in reality the former would result in 40 additional square miles in the park's most visited areas where visitors would hear engine noise more than half of each day.	1
D-SC4	OTHER REASONABLE ALTERNATIVES	
D-SC4.1	Commentors ask NPS to consider an alternative that combines elements of Alternatives 1, 4 and 5: * 20% of daily entries led by trained, non-commercial guides. * EPA compliant snowmobiles allowed on the CDST. * All entrances remain open. * Daily, rather than seasonal limits. * Reduce daily limits if needed to meet planning goals while allowing more visitor flexibility.	258
D-SC4.2	Commentors ask NPS to consider an alternative that would eliminate all snowmobiles and provide access by commercial wheeled vehicles only.	6
D-SC4.3	Commentors ask NPS to consider an alternative that would plow most roads in Yellowstone and allow visitors to tour the park in privately owned vehicles, with reduced winter speed limits and requirements for tires with winter treads.	7
D-SC4.4	Commentors suggest expanding groomed trails for nonmotorized activity in certain areas including Canyon, Lake, and Old Faithful in YNP; the road from Cottonwood to Signal Mt. in GTNP; and future multi-purpose pathways to be constructed in Grand Teton.	25
D-SC4.5	Commentors ask NPS to consider an alternative that includes the following components: * Allow non-BAT snowmobiles on the CDST, Jackson Lake (for Wyoming Game and Fish Department and fishing access), and from Flagg Ranch west to provide access to national forest trails. * Allow up to 50% of daily snowmobiles entries on the CDST and Grassy Lake Road to be used by commercial snowmobile outfitters.	92
D-SC4.6	Commentors ask NPS to consider an alternative that would transport winter visitors via horse-drawn sleds.	7
D-SC4.7	Commentors suggest cycling be included as an acceptable form of non-motorized winter travel. They state * Just like cross-country skiing, cycling is an appropriate, low-impact, muscle-powered activity that provides visitors a safe, healthy way to enjoy the parks. * Winter cycling, or snow biking, using 4"-wide tires is a growing aspect of cycling that is suited to groomed snow surfaces.	10
D-SC4.8	Commentors state that the DEIS fails to analyze a four-year snowmobile average of 250 as a component of any alternative and recommend that NPS do so. This would illustrate how impacts under the current status quo compare to the proposed alternatives.	10
D-SC4.9	Commentors state that the Final EIS should analyze an alternative that includes phasing in a fleet of updated, multi-season yellow bus/snowcoaches as part of a regional transportation plan.	9
D-SC4.10	Commentors recommend the final alternative should: * Keep all 4 entrances open. * Allow snowcoach and snowmobile access with daily entry limits of 60 snowmobiles through East and flexible daily limits for special occasions. * Accommodate unguided/noncommercially guided access. * Allow limited non-BAT (EPA compliant) on CDST and non-BAT on Jackson Lake. They state this would better meet the dual mandate of providing for public enjoyment of the parks while conserving resources and values.	5

PUBLIC COMMENT REPORT

Winter Use Plans, Draft Environmental Impact Statement

August 2007

North Wind, Inc.

Code	Code Description	Total Comments
D-VN100	STAKEHOLDER VALUES	
D-VN101	Commentors describe positive personal experiences in the national parks and/or out of doors.	700
D-VN102	Commentors describe negative personal experiences in the national parks or out of doors. Some commentors state that most park employees did not make them welcome, but gave the impression that YNP belonged to them instead of the visitors.	212
D-VN103	Commentors state objections to the values of society, the current Administration and/or federal government. Some commentors add that: * The Administration values money and/or business interests more than conservation and/or environmental protection. * We should encourage reasonable and considerate public use of the wild country.	404
D-VN104	Commentors state that they value motorized access to Yellowstone and/or that limits on use of federal parks and lands infringe on their right to access them. Some commentors add that their values are as legitimate as those who choose nonmotorized activities.	69
D-VN105	Commentors state that national parks are one of the last great legacies to the public. Some commentors add that: * The government should provide more funding for national parks. * It is an inexcusable dereliction of duty and honor to limit access, to limit funding and to allow the park system to deteriorate.	35
D-VN106	Commentors state that the residents of Cody value winter access through the East Entrance so deeply that they are willing to work with the NPS to keep it open.	8
D-VN107	Commentors remind NPS that visitors are opposed to management options that reduce access (Freimund and Borrie 2001). They state that closing Gibbon Canyon Road would adversely impact visitor access and circulation and that closing both Gibbon Canyon Road and East gate would decrease opportunities for oversnow travel in the park and concentrate use into smaller areas, which is contrary to the desired condition for visitor access and experience.	5
D-WQ4001	Commentors state that snowmobiles adversely impact water quality and/or express concerns about spills of gasoline and other toxic substances that may cause negative impacts on water quality.	47
	Total number of comments	1,276,393

Number of Documents from Gateway Communities

Driggs	ID	14
Island Park	ID	4
Tetonia	ID	4
Victor	ID	17
Absarokee	MT	0
Big Sky	MT	5
Cooke City	MT	4
Gardiner	MT	5
Gateway	MT	0
West Yellowstone	MT	58
Alpine	WY	9
Alta	WY	4
Cody	WY	462
Jackson	WY	167
Moran	WY	5
Teton Village	WY	4
Thayne	WY	5
Wapiti	WY	63
Wilson	WY	23
Yellowstone NP	WY	4

Number of Form and Non-Form Letters

Letter Type	Number of Documents
Form Letters	116,910
Non-form Letters	5,280
Totals	122,190

Note:

- * Some commentors sent more than one kind of form letter as well as one or more non-form letters; count may not match count of letters by state.

Number of Letters for Each Form Letter *

Form Letter ID	Total	Letter	Web	Park Form	Email
34	9	3	6		
46	238	202	36	1	
50	17,673	1	17,672		
17023	13,148	2	13,146		
26259	69		69		
29230	697	690	6		1
29231	82	80	1		1
29233	3,087	605			2,482
33633	8	1	7		
33634	27,160	1	27,159		
52866	53,274		40,328		12,946
53231	81	5	76		
55765	17		17		
83205	71		71		
101692	2		2		
104137	83	83			
118338	586		1		585
118999	625				625
	116,910	1,673	98,597	1	16,640

Note:

Some commentors sent more than one kind of form letter as well as one or more non-form letters, so count will not match count of letters by state or overall total. Also, several form letters are similar or identical in content, with differences only in the inside address or date.

APPENDIX

CORRESPONDENCE TEXT FROM FORM LETTERS

Correspondence Text from DEIS Form Letters

1. Form Letter 34

Correspondence Text

Testing

2. Form Letter 46

Correspondence Text

Dear Planning Team:

I am writing in support of continued snowmobiling access to Yellowstone and Grand Teton National Parks and the John D. Rockefeller, Jr. Memorial Parkway. I am opposed to Alternatives 2, 3 and 6 since they would not provide adequate access for the winter experience I desire. I ask that you consider a final management plan that blends several pieces of Alternatives 1, 4 and 5 to reflect the following:

Requiring that 100 percent of snowmobile visitors in Yellowstone be led by a commercial guide is undesirable and has proven to be detrimental to providing an adequate level of winter visitor use in the park. Please consider allowing up to 20 percent of daily entries to be led by non-commercial Certified Group Leaders who have taken a short certification course and would be responsible for managing their groups. Reducing group size and overall daily snowmobile limits in Yellowstone to 500 to 600 per day is acceptable, and better than having 720 entries per day allocated exclusively to commercial use. Certified Groups would still be heavily regulated and be very different than historic unguided access. Yellowstone is a public park and access should not be relegated to being only through commercial businesses.

Winter use in Grand Teton and the Parkway deserves to be considered on its own merits rather than being grouped with Yellowstone issues. In particular, allowing only BAT snowmobiles to be used in these parks is an overbearing, pointless limitation. Please consider allowing EPA compliant snowmobiles to be operated on the Continental Divide Snowmobile Trail, since this trail is immediately adjacent to plowed highways used by other motor vehicles, as well as for fishing access on Jackson Lake and operation in both directions on the Grassy Lake Road. If it is necessary to reduce group size and overall daily snowmobile limits or to limit the number of daily groups to accomplish this - that is acceptable and better than having only 140 entries per day .that are essentially useless since BAT snowmobiles are generally unavailable for use in this area by the general public who desire to connect to adjacent national forest trails.

I do not support seasonal entry limits and believe that winter use is best managed by daily entry limits.

The east entrance to Yellowstone is important and should be kept open to all winter visitors, including snowmobilers and snowcoach riders. Park managers should continue to provide avalanche control by the use of improved modern technology and practices. Additionally, it would be irresponsible to allow skiers and snowshoers to continue using Sylvan Pass if it is closed and not groomed for motor vehicles since, unmanaged, it would create an extreme liability to recreationists and the park.

Thank you for this opportunity to comment.

3. Form Letter 50

Correspondence Text

National Park Service PEPC
Dear National Park Service PEPC,

The National Park Service has now determined in three separate analyses--in November 2000, February 2003, and August 2004—that continued snowmobile use is harmful to park resources, healthy enjoyment of the parks by visitors, and safe working conditions for employees. Each of these studies concluded that Yellowstone would be significantly cleaner, quieter, less hectic, and healthier if snowmobile use is ended and visitor access on snowcoaches is expanded.

of snowmobiles. A person who has taken a special Internet based training course on snowmobiling for Yellowstone could lead these small groups.

2. In addition, I support continued access to Yellowstone National Park through the East entrance. Cody, Wyoming needs this access to the Park in the winter for both motorized and no motorized park visitors.
3. I support maintaining the current group size of eleven snowmobiles in a group with one commercial guide. Reducing the number to eight as proposed will drive up the cost per person and reduce flexibility.
4. In Grand Teton National Park there should be some percentage of the daily entrances for through snowmobiles that travel from Moran Junction to Flagg Ranch and onto the Grassy Lake Road and the National Forest. These snowmobiles would not have to meet BAT standards. This change would allow for more use of the Continental Divide Snowmobile Trail and the purpose it was created for!

I also encourage you to use partnerships with the surrounding communities, counties and states to expand educational opportunities that inform winter visitors regarding Park rules, user ethics, visitor safety and appreciation of the Park resources.

7. Form Letter 29231

Correspondence Text

I am writing to support the concept of continued snowmobile access to Yellowstone National Park. After experiencing first-hand, a snowmobile trip into Yellowstone National Park, I feel this is the best way to experience the magnificent natural features the Park has to offer in the winter. I have reviewed the draft environmental impact statement and wish to offer the following points to consider in developing the final EIS on Winter Use in Yellowstone.

1. I support continued snowmobile access to Yellowstone.
2. I support maintaining the current group size of eleven snowmobiles in a group with one commercial guide (10 guests +1 guide). Reducing the number to eight, as proposed, will reduce flexibility and drive up the cost per person.
3. I support continued snowmobile access to Yellowstone National Park via the East Entrance. The East Entrance is important to Yellowstone and should be kept open to all winter visitors, including snowmobiles and snowcoaches. Park managers should continue to provide avalanche control by the use of improved modern technology and practices.

I appreciate your time and attention to my comments.

8. Form Letter 29233

Correspondence Text

I support continued winter access through the East Gate into Yellowstone National Park for multi-purpose recreational uses as defined in Alternative #4 of the DEIS.

The DEIS winter use plan generally fails to follow federal (NEPA) guidelines and does not "rigorously explore and objectively evaluate all reasonable alternatives." Specifically, the Park's preferred alternative:

- ignores the significant adverse impact of park policies on Park County, Wyoming's economy as detailed in the Dr. David Taylor report of March 2007;
- disregards the avalanche report commissioned by the Park itself (the Bob Comey report of February 2007) identifying the howitzer as the preferred avalanche mitigation technique for Sylvan Pass;
- attempts to justify a decision that is being incrementally implemented or that has already been made, i.e. to reduce visitor access through the East Gate in order to justify closure;
- ignores the significant adverse impact park policies have on structures listed in the National Register of Historic Places;
- would set the undesirable public policy precedent of restricting public access to a national park based on the manipulation of cost per visitor data;
- fails to provide a baseline alternative that accurately reflects the current management plan;
- would concentrate more traffic in the most heavily congested parts of the Park where there is a significant

concentration of animals;
--would seasonally close a newly reconstructed federal highway that is an important route for victims of domestic violence;
--would deprive annual pass holders of their purchased right to annual access; and
--violates the Americans with Disability Act by restricting recreational access through the East Gate.

We respectfully request that you take these matters into consideration, Superintendent Lewis, as you develop your final winter use plan.

9. Form Letter 118999

Correspondence Text

The National Park Service has now determined in three separate analyses--in November 2000, February 2003, and August 2004--that continued snowmobile use is harmful to park resources, healthy enjoyment of the parks by visitors, and safe working conditions for employees. Each of these studies concluded that Yellowstone would be significantly cleaner, quieter, less hectic, and healthier if snowmobile use is ended and visitor access on snowcoaches is expanded.

It's time for the Park Service to implement what its own studies have concluded: "that snowcoach access would provide public motorized access to Yellowstone while having the lowest impact on air quality, water quality, natural soundscapes and wildlife - while presenting the lowest risk of visitor and Park Service staff health and safety."

If you must conduct another study, please look at ways to speed up a transition to the best available protection provided by snowcoach access which has been delayed for too long. Do NOT accept snowmobile use at levels above those which have caused documented problems the past several winters.

And do NOT consider backtracking on the commercial guiding requirement or other "strict limitations" that you and top Administration officials have asserted repeatedly are fundamental to protecting the Parks.

With respect and appreciation for everyone who has worked hard to keep our national parks on the best possible path, I urge you not to weaken standards in Yellowstone and Grand Teton. Instead, please implement the transition to snowcoaches--which your studies have consistently identified as the best way to balance public access with preserving these magnificent places for future visitors to enjoy.

Thanks for allowing me to submit my views. Please do NOT add my name to your mailing list. I will learn about future developments on this issue from other sources.

10. Form Letter 33633

Correspondence Text

There is no good reason to allow more snowmobiles in Yellowstone National Park during the winter. According to the National Park Service's own studies, increasing snowmobile use will damage park air and disturb more wildlife. They also create noise pollution that spoils the park experience for visitors and employees.

The current proposal to allow 720 snowmobiles a day in Yellowstone would undo all the progress that's been made since snowmobile use decreased to 250 a day several years ago. In that time, the use of park-friendly snowcoaches has increased - making the park environment healthier while providing full winter access to visitors.

Since snowmobile use in Yellowstone declined, the park's air quality has been improved. The Clean Air Act and its newly affirmed Management Policies give the National Park Service clear direction: to provide "the best possible air quality." Yet if snowmobile numbers expand from 250 to 720, we'll see a doubling of hydrocarbon emissions and a tripling of particulate and nitrogen oxide emissions. That's not "the best possible air quality" - it's actually a big step backwards from where we are now.

I urge you not to weaken the environmental standards in Yellowstone. Please reconsider the proposal to increase snowmobiles in the park, and please continue to work toward transitioning to snowcoaches. That's the best way to balance public access and the need for clean air, safe wildlife, and a peaceful park.

11. Form Letter 33634

Correspondence Text

There is no good reason to allow more snowmobiles in Yellowstone National Park during the winter. According to the National Park Service's own studies, increasing snowmobile use will damage park air and disturb more wildlife. They also create noise pollution that spoils the park experience for visitors and employees.

The current proposal to allow 720 snowmobiles a day in Yellowstone would undo all the progress that's been made since snowmobile use decreased to 250 a day several years ago. In that time, the use of park-friendly snowcoaches has increased - making the park environment healthier while providing full winter access to visitors.

Since snowmobile use in Yellowstone declined, the park's air quality has been improved. The Clean Air Act and its newly affirmed Management Policies give the National Park Service clear direction: to provide "the best possible air quality." Yet if snowmobile numbers expand from 250 to 720, we'll see a doubling of hydrocarbon emissions and a tripling of particulate and nitrogen oxide emissions. That's not "the best possible air quality" - it's actually a big step backwards from where we are now.

I urge you not to weaken the environmental standards in Yellowstone. Please reconsider the proposal to increase snowmobiles in the park, and please continue to work toward transitioning to snowcoaches. That's the best way to balance public access and the need for clean air, safe wildlife, and a peaceful park.

12. Form Letter 52866

Correspondence Text

I oppose your proposal to allow 720 snowmobiles per day in Yellowstone National Park. Instead, you should protect the park's natural values, promote the healthy enjoyment of the park by visitors, and provide safe working conditions for employees by lowering the current limit of 250 snowmobiles per day down to zero.

Four Park Service studies -- at a cost of \$10 million -- have shown that Yellowstone would be significantly cleaner, quieter, less hectic and healthier if snowmobile use was phased out. Please heed your own management policies, the conclusions of your scientists, the advice of your former directors and the wishes of the vast majority of American citizens and adopt Alternative 2, which calls for providing winter access on modern snowcoaches and phasing out snowmobile use in the park.

During this phase-out, the commercial guiding requirement and other "strict limitations" you have implemented should be retained, while public access to the park aboard modern snowcoaches is expanded. Snowcoaches provide an environmentally friendly way for visitors to access the park for skiing, snowshoeing and other winter adventures.

I commend the Park Service for the improved conditions -- including fresher air, more vibrant natural sounds and less human conflicts with wildlife -- in Yellowstone and Grand Teton national parks over the past four winters. As we all know, those conditions are a direct result of fewer snowmobiles in the parks.

For the sake of present and future generations of visitors, the Park Service must maintain this positive trend in America's flagship national park by phasing out snowmobiles in favor of Alternative 2 (snowcoach-only access).

13. Form Letter 53231

Correspondence Text

I support the concept of continued snowmobile access to Yellowstone and Grand Teton National Parks. Individual travel by snowmobile provides the best way to experience the magnificent natural features of the Parks in the winter. Please include the following points in developing the final EIS on Winter Use in the Yellowstone and Grand Teton National Parks.

1. Please allow a small percentage of daily entrances into Yellowstone Park by non-commercially guided small groups of snowmobilers. These small groups could be led by a person who had taken a special internet based training course on snowmobiling in Yellowstone.

2. In addition, I support continued access to Yellowstone National Park through the East entrance. Cody, Wyoming needs this access to the Park in the winter for both motorized and non-motorized park Visitors.

3. I support maintaining the current group size of eleven snowmobiles in a group with one commercial guide. Reducing the number to eight as proposed will drive up the cost per person and reduce flexibility.

4. In Grand Teton National Park there should be some percentage of the daily entrances for through snowmobilers who travel from Moran Junction to Flagg Ranch and onto the Grassy Lakes Road and the National Forest. These snowmobiles would not have to meet BAT standards. This change would allow for more use of the Continental Divide Snowmobile Trail and the purpose it was created for!

I also encourage you to use partnerships with the surrounding communities, counties and states to expand educational opportunities that inform winter visitors regarding Park rules, user ethics, visitor safety and appreciation of the Park resources.

14. Form Letter 55765

Correspondence Text

I oppose your proposal to allow 720 snowmobiles per day in Yellowstone National Park. Instead, you should protect the park's natural values, promote the healthy enjoyment of the park by visitors, and provide safe working conditions for employees by lowering the current limit of 250 snowmobiles per day down to zero.

15. Form Letter 83205

Correspondence Text

I oppose your proposal to allow 720 snowmobiles per day in Yellowstone National Park. Instead, you should protect the park's natural values, promote the healthy enjoyment of the park by visitors, and provide safe working conditions for employees by lowering the current limit of 250 snowmobiles per day down to zero.

Four Park Service studies -- at a cost of \$10 million -- have shown that Yellowstone would be significantly cleaner, quieter, less hectic and healthier if snowmobile use was phased out. Please heed your own management policies, the conclusions of your scientists, the advice of your former directors and the wishes of the vast majority of American citizens and adopt Alternative 2, which calls for providing winter access on modern snowcoaches and phasing out snowmobile use in the park.

16. Form Letter 104137

Correspondence Text

I am writing to request that you include the following potential management components in the range of alternatives that are currently being developed for the Winter Use EIS for Yellowstone and Grand Teton National Parks and the John D. Rockefeller, Jr., Memorial Parkway.

Winter use in Grand Teton and the Parkway should be considered on its own merits rather than being drug along solely on the basis of Yellowstone winter use issues. Please include the following components in the range of alternatives and ensure that they receive meaningful consideration during the analysis of alternatives:

Allow non-BAT snowmobiles to be operated on the Continental Divide Snowmobile Trail (CDST) since 100% of this trail is immediately adjacent to plowed highways used by other motor vehicles.

Allow non-BAT snowmobiles to be operated on Jackson Lake for fishing access since BAT snowmobiles cannot safely pass through unpacked and drifted snow.

Allow non-BAT snowmobiles to depart from Flagg Ranch on the Grassy Lake Road in order to provide access to national forest trails located on the Targhee National Forest.

Allow up to 50% of daily snowmobiles entries on the CDST and Grassy Lake Road to be used by commercial snowmobile outfitters.

Thank you for your consideration.

17. Form Letter 101692

Correspondence Text

I support Alternative 2, which calls for providing winter access on modern snow coaches and phasing out snowmobile use in the park. Alternative 2 has been recommended by Yellowstone's own scientists in order to avoid adverse impacts on the park's wildlife, and to provide better air quality. Thank you.

18. Form Letter 118338

Correspondence Text

Over the last four winters, visitors to Yellowstone and Grand Teton experienced parks that were cleaner and quieter than they had been in decades. These four winters have proven out what your previous three studies predicted - that transitioning to snowcoach-only access would result in lower levels of air and noise pollution and less disturbance of wildlife.

Given that snowcoaches are more affordable, comfortable and provide great educational opportunities for individuals touring Yellowstone, it is not surprising that their use increased 67 percent since 2003. The purpose of the winter use plan is to provide public recreation opportunities that do not impair park resources and values. Your preferred alternative, which recommends 720 snowmobiles per day, fails to do this. Over the last four winters, 250 snowmobiles on average have entered Yellowstone per day. However, even with the decrease to 250 snowmobiles in the Park, natural sounds are obscured by noise and wildlife continue to be disturbed. Your management policies, newly reaffirmed, requires the best possible air quality in parks, protection of natural soundscapes and avoidance or minimization of adverse impacts to park resources and values.

If snowmobile use increases as you propose, the resurgent natural conditions in the Park will be lost and the Park Service will be failing to uphold the management policies in the following ways:

*The Park Service is supporting an alternative that will result in a decline in Yellowstone's air quality. The preferred alternative will allow nearly five times the carbon monoxide and 17 times the hydrocarbons as the snowcoach-only alternative.

* Noise is already a problem with only 250 snowmobiles in the Park per day, and the DEIS concludes that this problem would grow significantly worse under the preferred alternative of 720 snowmobiles per day.

* Yellowstone's own scientists have recommended that winter traffic remain "at or below" 250 snowmobiles per day. The proposal to increase snowmobile use is at odds with the recommendation of scientists and is wrong for Yellowstone.

After nearly a decade of studies the government has spent 10 million tax dollars. All of the studies, including this DEIS, have demonstrated that Yellowstone's air quality, peace and quiet and wildlife would be protected best if snowmobile use is replaced with expanded public access on modern snowcoaches.

In March, seven former NPS directors said that making the right decision is vitally important to keeping, not just Yellowstone, but the entire National Park System on the right path. If the transition to snowcoaches is reversed, the directors concluded it would "undercut the park's resurgent natural conditions" and would represent a departure from the conservation-first ethic that has governed management of America's national parks from the beginning. It is time to end this debate and do what the Park Service and the Environmental Protection Agency have both concluded is best for Yellowstone – a full transition to snowcoach-only access.