



**PUBLIC COMMENTS ON THE PROPOSED RULE**  
**36 CFR Part 7: Special Regulations, Areas of the National Park System**  
**Yellowstone and Grand Teton National Parks and the John D. Rockefeller, Jr., Memorial Parkway**

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**NATIONAL PARK SERVICE**

This report presents the results of the public comment period for the National Park Service (NPS) Proposed Rule to manage winter visitation and recreational use in Yellowstone National Park and Grand Teton National Park (GTNP) and the John D. Rockefeller, Jr., Memorial Parkway. The text of the Proposed Rule appeared in the *Federal Register* on Wednesday, May 16, 2007 (Vol. 72, No. 94, 27499 - 27519).

**BACKGROUND**

The National Park Service has been considering winter use management of Yellowstone and Grand Teton National Parks and the John D. Rockefeller, Jr., Memorial Parkway for over a decade. This effort has included planning, public participation, litigation, and National Environment Policy Act (NEPA) documentation. The following is a short summary of events 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 snowplane 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 appeared 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  |

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	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, appeared 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 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.
April 2, 2007	The NPS issued the Winter Use Plans Draft Environmental Impact Statement (DEIS) for review, with the comment period extending through June 5, 2007. NPS received 122,190 documents containing comments on the DEIS.
May 16, 2007	The Proposed Rule based on the DEIS appeared in the <i>Federal Register</i> , announcing a public comment period that extended through July 16, 2007.
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 NPS contracted with North Wind, Inc. (North Wind) to collect and analyze the comments on the Proposed Rule. Stakeholders sent paper comment letters directly to the NPS, and these were forwarded to North Wind for processing. Additional comments came through *Regulations.gov*, an electronic Internet-based system, or were hand-delivered to park headquarters.

North Wind received 1,481 documents including 1,444 in hard copy and 37 in electronic form. Staff considered all documents, analyzing each document and associating the content with one or more text statements that summarized the content of all comments received. The result is a profile for each comment document that reflects its content.

## **SUMMARY TABLES**

The following database queries developed by North Wind provide tabular summaries of the content analysis:

- Number of Commentors and Letters from Each State
- Number of Commentors Who Expressed Each Comment
- Number of Commentors and Letters from "Gateway Communities"
- Number of Form Letter and Non-form Letter Commentors
- Number of Commentors for each type of Form Letter
- Number of Commentors that Responded via the Web or US Mail, for Form Letters and non-Form Letters
- Number of Commentors - By State and Position on Rule

These tables are provided on the following pages.

### Number of Commentors and Letters from Each State

State	Number of Letters	Number of Commentors	% of Total Commentors
AK	4	4	0.28
AL	3	3	0.21
AR	2	2	0.14
AZ	20	20	1.38
CA	155	155	10.69
CO	81	81	5.59
CT	13	13	0.90
DC	7	7	0.48
DE	2	2	0.14
FL	42	42	2.90
GA	12	12	0.83
HI	7	7	0.48
IA	33	30	2.07
ID	17	17	1.17
IL	49	49	3.38
IN	14	14	0.97
KS	7	7	0.48
KY	7	7	0.48
LA	1	1	0.07
MA	41	41	2.83
MD	17	17	1.17
ME	6	6	0.41
MI	69	65	4.48
MN	138	132	9.10
MO	16	16	1.10
MS	2	2	0.14
MT	34	32	2.21
NC	28	28	1.93
ND	29	28	1.93
NE	11	9	0.62
NH	18	17	1.17
NJ	18	18	1.24
NM	15	14	0.97
NV	12	12	0.83
NY	69	68	4.69
OH	27	26	1.79
OK	4	4	0.28
OR	38	38	2.62

Draft Report: Public Comments on the Proposed Rule  
Yellowstone and Grand Teton National Parks and the John D. Rockefeller, Jr., Memorial Parkway

August 31, 2007

North Wind, Inc.

State	Number of Letters	Number of Commentors	%Total Commentors
PA	37	37	2.55
PR	3	3	0.21
RI	4	4	0.28
SC	7	7	0.48
SD	13	13	0.90
TN	16	16	1.10
TX	39	39	2.69
UT	21	21	1.45
VA	19	19	1.31
VI	2	2	0.14
VT	19	18	1.24
WA	69	69	4.76
WI	76	71	4.90
WV	2	2	0.14
WY	26	25	1.72
OTHER *	60	58	4.00
<b>Totals **</b>	<b>1,481</b>	<b>1,450</b>	<b>100.00</b>

\* "OTHER" includes letters with missing, incomplete, or overseas addresses.

\*\* Some commentors submitted multiple letters, and some letters had multiple signatures. Therefore, totals for letters and commentors may differ.

## Number of Commentors Who Expressed Each Comment

ID	Comment Text	Number of Commentors
<b>3.1</b>	<b>Air Quality and Air Quality-Related Values</b>	
3.1.1	Commentors state that snowmobiles adversely impact air quality.	198
3.1.1.1	Commentors state that reductions in the number of snowmobiles in the park along with BAT requirements have led to improved air quality. Some add that the temporary plan and interim regulations have not been responsible for the improvements as stated in the Proposed Rule.	3
3.1.1.2	Commentors suggest that NPS sell entrance tickets in gateway communities to reduce congestion and air quality impacts at entrances.	1
3.1.2	Commentors state that new requirements for snowmobiles accessing the parks have reduced emissions and met air quality concerns.	2
3.1.3	Commentors state that snowcoaches have negative impacts on air quality, and/or object to their negative impacts.	3
<b>3.2</b>	<b>Health and Safety</b>	
3.2.1	Commentors state that snowmobiles adversely impact health and safety.	35
3.2.2	Commentors state that allowing nonmotorized users to continue to access Sylvan Pass without avalanche control is irresponsible.	4
<b>3.3</b>	<b>Natural Soundscapes</b>	
3.3.1	Commentors state that snowmobiles adversely impact natural soundscapes.	184
3.3.2	Commentors state that visitors should not reasonably expect to enjoy natural quiet in a National Park with hundreds of other visitors traveling along the same transportation infrastructure. Some add that the parks have vast backcountry opportunities for experiencing natural quiet.	4
3.3.3	Commentors state that snowcoaches adversely impact natural soundscapes.	1
3.3.4	Commentors state that sounds from snowmobiles with BAT are not intrusive and have no adverse impacts on soundscapes.	1
<b>3.4</b>	<b>Socioeconomics</b>	
3.4.1	Commentors state that closing Sylvan Pass and the East Entrance in winter would have negative socioeconomic effects on communities who depend on winter tourism.	15
3.4.2	Commentors state that the requirement that 100% of snowmobile visitors be led by a commercial guide has led to negative socioeconomic impacts.	271
3.4.3	Commentors state that continuing to allow snowmobiles in the park will have negative socioeconomic impacts because visitors will boycott the parks.	8
3.4.4	Commentors state that banning snowmobiles will not have negative socioeconomic impacts on gateway communities. Some state these communities will benefit from snowcoach operations and/or diversifying winter use.	2
3.4.5	Commentors state that the parks are important economically to surrounding counties, and citizens expect reasonable access to the parks.	4
3.4.6	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 Entrance in winter.	2
3.4.7	Commentors state that revenue from snowmobilers provides capital required to maintain the parks so they may be enjoyed by all users in all seasons.	1

Draft Report: Public Comments on the Proposed Rule  
Yellowstone and Grand Teton National Parks and the John D. Rockefeller, Jr., Memorial Parkway

August 31, 2007

North Wind, Inc.

<b>3.5</b>	<b>Visitor Access and Circulation</b>	
3.5.1	Commentors state that snowcoaches provide adequate access to the parks.	23
3.5.2	Commentors state that the Proposed Rule denies access by individual snowmobilers, which they have enjoyed responsibly for decades. Some commentors add that reduction of access to the park is also a cumulative impact to some stakeholders because of restrictions on access to other federal lands.	4
3.5.3	Commentors state that they value motorized oversnow access to various park features such as Jackson Lake and/or that limits on use of federal parks and lands infringe on their right to access them.	2
3.5.4	Commentors state that visitors are opposed to management options that reduce access according to NPS visitor surveys (Freimund and Borrie 2001).	1
<b>3.6</b>	<b>Visitor Experience</b>	
3.6.1	Commentors state that snowmobiles in the park adversely impact visitor experience. Some commentors add that they disturb peace and quiet in the parks.	94
3.6.2	Commentors state that closing the East Entrance would diminish visitor experience by depriving visitors of that area's unique qualities.	2
3.6.3	Commentors state that requiring snowcoach travel has negative impacts on visitor experience.	1
3.6.4	Commentors state that under the Preferred Alternative there is no opportunity for snowmobile visitors to enjoy YNP through their own personalized experience. They add that allowing limited unguided and/or noncommercially 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...	1
<b>3.7</b>	<b>Wildlife, including Bison and Elk</b>	
3.7.1	Commentors state that snowmobiles adversely impact wildlife.	114
3.7.2	Commentors state that snowmobiles do not adversely impact wildlife.	5
<b>3.8</b>	<b>General Impacts</b>	
3.8.1	Commentors state that snowmobiles waste resources and/or contribute to global warming.	52
3.8.2	Commentors state that snowmobile use has negative impacts on park resources and/or values. Some add it is irresponsible to allow snowmobiles to continue to use the public lands in light of their negative impacts.	147
3.8.3	Commentors state that snowmobile use has negative impacts on water quality.	5
3.8.4	Commentors state that the lower numbers of snowmobiles in the parks over the last four years have reduced impacts to park resources.	1
3.8.5	Commentors state that snowmobiles adversely impact vegetation.	1
3.8.6	Commentors state that snowmobiling does not result in negative environmental impacts.	1
<b>4</b>	<b>DESCRIPTION OF THE PROPOSED RULE/MANAGEMENT TECHNIQUES</b>	
<b>4.1</b>	<b>Monitoring of Park Resources and Values</b>	
4.1.1	Commentors state they support adaptive management to guide management of noncommercially guided groups and/or use of non-BAT snowmachines on the CDST. Some express concern about the potential for misuse of adaptive management strategies.	4
<b>4.2</b>	<b>Daily Entry Limits</b>	
4.2.1	Commentors state that no more than 50 snowcoaches should be admitted to the parks per day to maximize per coach occupancy.	322
4.2.2	Commentors state they support limits or low limits on the number of snowmobiles allowed in the parks.	30
4.2.3	Commentors suggest using a lottery to determine who would be able to enter the parks on	1

Draft Report: Public Comments on the Proposed Rule  
Yellowstone and Grand Teton National Parks and the John D. Rockefeller, Jr., Memorial Parkway

August 31, 2007

North Wind, Inc.

	snowmobiles.	
<b>4.3</b>	<b>Commercial Guide Requirements</b>	
4.3.1	Commentors state they support guided snowmobile access to the parks.	5
4.3.1.1	Commentors state they support the 10 plus 1 group size because it has been tested and has proven to work; changing it would have significant long-term, adverse effects on businesses and winter visitation.	563
4.3.1.2	Commentors state specific objections to larger group sizes because they would: * Affect visitor safety * Increase the sound level and duration * Diminish visitor experience.	6
4.3.1.3	Commentors object to smaller group sizes for one or more of the following reasons: * They would increase the number of groups, thus increasing the percentage of audible noise times * They would increase the costs for visitors * Transportation for smaller groups wastes gas because vehicles would not be operated at full capacity * Small group size will not accommodate large families. * They detract from visitor experience. Some commentors provide examples of their concerns from operations in the park.	259
4.3.1.4	Commentors state that the final rule should specify a minimum group size larger than 2, and management of snowmobiles in the three parks by a daily limit on snowmobile groups.	266
4.3.2	Commentors state objections to the 100% commercial guiding requirements. Some state the requirement has led to negative socioeconomic effects on local communities. Some feel that the requirement discriminates against the individual snowmobile user. Some state the 100% commercial guide requirement constitutes an unlawful tax levy.	329
4.3.2.1	Commentors support allowing varying percentages of the daily entrances into the parks to be noncommercially guided by a trained or certified guide. Some suggest a group size of 5 plus 1 for these noncommercially guided groups.	564
4.3.2.1.1	Commentors recommend requirements for snowmobile operators who are part of groups led by certified leaders: a valid driver's 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.	2
4.3.2.2	Commentors state that NPS has not provided data to support statements that commercial guides mitigate impacts to soundscapes, wildlife, and safety. They state the analysis is flawed because noncommercially guided groups have not been tried since implementation of managed winter use in 2003.	1
4.3.3	Commentors request that the rule clarify the group size restrictions that would be in effect this winter; this will ensure that concessionaires who have scheduled groups of 10 do not have to reduce the group size at the last minute to seven visitors.	1
4.3.4	Commentors object to guides for snowmobiles groups. Some add that summer visitors are not required to have guides.	5
<b>4.4</b>	<b>Best Available Technology (BAT)</b>	
4.4.1	Commentors support BAT and/or state that snowmobiles should be cleaner and more efficient. Some commentors express their support for the Family Emissions methodology for demonstrating compliance and use of the Snowmobile Safety and Certification Committee form as well as private testing and certification.	17
4.4.2	Commentors state that EPA compliant or other non-BAT snowmobiles should be allowed on CDST, Grassy Lake Road, and Jackson Lake in Grand Teton and the Parkway.	509
4.4.3	Commentors state that they support BAT for snowcoaches. Some commentors add that these improvements should be phased in earlier than 2011-2012.	327
<b>4.5</b>	<b>Route Restrictions</b>	



Draft Report: Public Comments on the Proposed Rule  
Yellowstone and Grand Teton National Parks and the John D. Rockefeller, Jr., Memorial Parkway

August 31, 2007

North Wind, Inc.

4.5.1	Commentors support route restrictions for snowmobiles and/or snowcoaches used in the parks.	4
4.5.2	Commentors object to various route restrictions on snowmobile use in the parks, including closure of Sylvan Pass (East Entrance of the park) and/or various side roads. Some add that NPS should continue to look at options to keep these routes open, including increased recreation use fees to help defray costs, resuming use of the howitzer as the primary method for avalanche control, or contracting this work out so employee safety would not be an issue.	567
4.5.3	Commentors state there is no clear argument for closing Sylvan Pass and/or no substantial data to support closure based on safety concerns. Some state that the decision to close the pass is unfair.	7
4.5.3.1	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 visitation through this entrance would increase to historic levels if NPS were to allow limited noncommercially guided access.	3
4.5.4	Commentors state they support closure of Sylvan Pass (East Entrance of the park) during the winter season. Some cite costs and safety as reasons for their support.	2
4.5.5	Commentors request that NPS reconsider allowing access to Firehole Canyon Drive, North Canyon Rim Drive, and Riverside Drive for snowmobile visitors.	1
4.5.6	Commentors state that NPS should continue to analyze the costs of keeping the East Entrance open during the winter.	3
<b>4.9</b>	<b>Enforcement</b>	
4.9.1	Commentors state that NPS should strictly enforce existing rules and punish violators.	3
<b>4.10</b>	<b>General Statements about Snowmobile Management</b>	
4.10.1	Commentors make statements criticizing the current administration and/or federal government. Some state politics or greed is driving the decision on winter use.	73
4.10.2	Commentors state that the snowmobile lobby is influencing the decision on winter use.	38
4.10.3	Commentors state that snowmobiles should be banned from Yellowstone and/or all National Parks. Some commentors state that legal and policy mandates support eliminating snowmobiles from the parks, including Interior Secretary Kempthorne's management direction and strategic plan.	197
4.10.4	Commentors support a diversity of oversnow transportation including both snowmobiles and snowcoaches.	62
4.10.5	Commentors state support for continued access to the parks by snowmobile. Some commentors add that snowmobilers' entrance fees should support studies of potential adverse environmental impacts and how to mitigate them.	512
4.10.6	Commentors recommend that the final rule specify managing CDST and the Grassy Lake Road as one unit focused on through trips associated with adjacent national forests.	271
4.10.7	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 GTNP.	1
<b>5</b>	<b>COMPLIANCE WITH OTHER LAWS AND MANDATES</b>	
5.1	National Environmental Policy Act: Commentors make one or more statements regarding NPS compliance with NEPA.	4
5.2	Organic Act: Commentors state that implementation of the Proposed Rule will cause NPS to violate the Organic Act, other NPS mandates, and/or its mission to preserve unimpaired the natural and cultural resources and values of the National Park System (such as its pristine nature, peace and quiet, wilderness, etc.) for this and future generations.	310
5.2.1	Commentors state that NPS is not responsible for the profits of industry and corporations.	10

Draft Report: Public Comments on the Proposed Rule  
Yellowstone and Grand Teton National Parks and the John D. Rockefeller, Jr., Memorial Parkway

August 31, 2007

North Wind, Inc.

5.2.2	Commentors state there is not a valid need to provide all types of opportunities for recreational activities in the national parks.	22
5.2.3	Commentors state that conservation must be the priority when there is a choice between visitor access and protection of park resources and values.	33
5.3	Commentors emphasize that the NPS mission is to provide park access for the enjoyment, education, and inspiration of this and future generations.	14
5.4	Commentors state objections to perceived efforts by the Administration and/or the NPS to rewrite basic park policy to promote recreation over park protection.	36
5.5	Commentors state that NPS guidelines on resource protection require park managers to select forms of transportation that have the fewest impacts.	4
5.6	Commentors note that new Clean Air Act Management Policies require the National Park Service to maintain the best possible air quality in the parks.	2
5.7	Commentors express concern that publishing a list of vehicles that meet park requirements affects interstate commerce and impairs contract abilities.	2
<b>6</b>	<b>PUBLIC PARTICIPATION</b>	
6.1	Commentors state that NPS should consider the comments of all park stakeholders, not just the vocal minority or commercial interests.	43
6.2	Commentors state that previous studies, former NPS directors, and the majority of the American public agree that snowmobiles adversely impact the parks' resources and values.	863
6.3	Commentors recommend that NPS partner with surrounding communities, counties and states to provide public information to winter visitors regarding park rules, user ethics, safety, and appreciation of the park resources.	256
6.4	Commentors state that ignoring widespread public opposition to a use that degrades the national parks and other places is undemocratic.	13
6.5	Commentors express appreciation to the Park Service for providing multiple opportunities for the public to participate in the decision making process.	9
6.6	Commentors (including cooperating agencies) feel their input and efforts in resolving winter use issues have been largely ignored by Park Service planners.	2
6.7	Commentors state they appreciate efforts by NPS to work with snowmobile manufacturers on appropriate documentation for BAT sound requirements and compliance.	1
6.8	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.	1
<b>7</b>	<b>REGULATIONS RELATING TO SPECIFIC PARK UNITS</b>	
<b>7.1</b>	<b>Yellowstone National Park</b>	
7.1.1	Commentors request that NPS set fixed opening and closing dates for winter access to Yellowstone Park of December 15 and March 15. Some commentors add that this would provide for consistency in planning.	2
7.1.2	Commentors recommend extended hours for access to Firehole Canyon, North Canyon Rim, and Riverside Drive in Yellowstone to provide more flexibility for guided tours.	2
<b>8</b>	<b>PRO-RULE</b>	
8.1	Commentors generally support a Proposed Rule based on Alternative 1 in the DEIS.	10
<b>9</b>	<b>ANTI-RULE</b>	
9.1	Commentors object to the Proposed Rule. Some commentors add that the rule contradicts the 2001 final rule that required sharp reductions in winter visitation. Some state there has been no new information to persuasively reject that rule. Some commentors add that the Proposed Rule would: * Adversely impact visitor enjoyment of peace and quiet. * Conflict with recommendations of park biologists and adversely impact wildlife. * Reverse progress made to air quality .	865
<b>9.2</b>	<b>Commentors make statements about other alternatives in the EIS as a basis for the</b>	

Draft Report: Public Comments on the Proposed Rule  
Yellowstone and Grand Teton National Parks and the John D. Rockefeller, Jr., Memorial Parkway

August 31, 2007

North Wind, Inc.

<b>Proposed Rule</b>		
9.2.1	Commentors state they support Alternative 2.	861
9.2.1.1	Commentors state they support Alternative 2 because it impacts park resources and values the least while accommodating human recreational access.	10
9.2.1.2	Commentors object to Alternative 2 for various reasons. Some state it does not provide balanced use between snowmobiles and snowcoaches. Some state snowcoaches are not reliable and/or cannot provide access to all areas of the park.	4
9.2.1.2.1	Commentors discuss various potential snowcoach improvements.	1
9.2.2.1	Commentors state they oppose Alternative 3 and/or 250 snowmobiles per day proposed in Alternative 3.	5
9.2.3	Commentors state they support Alternative 4 and/or elements of it. Some recommend modifications to the alternative.	7
9.2.4	Commentors state they support Alternative 5 and/or elements of it.	4
9.2.6	Commentors state they support an alternative that blends several pieces of Alternatives 1, 4, and 5.	271
9.2.7	Commentors state they support a final alternative that keeps all four entrances open, requires BAT-only snowmobiles and snowcoaches in YNP, allows daily entry limits of 60 snowmobiles through the East Entrance and flexible daily limits for special occasions, and that accommodates noncommercially guided access.	2
9.2.8	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.	2
<b>10</b>	<b>MAJOR ISSUES</b> <b>Commentors identify other issues and/or concerns related to the Proposed Rule.</b>	
10.1	Commentors state that there are plenty of other lands on which to snowmobile; therefore, snowmobiles should not be allowed in the parks.	54
10.2	Commentors support continuation of the preferential right of renewal of long-time, small concessioners. They state that without the preferential right of renewal and the certainty that a long-term concession contract provides, small businesses would suffer and it would be a detriment to rural communities and visitor experience. Some commentors add that the final rule should recognize this right.	4
10.3	Commentors state that NPS should promote nonmotorized winter activities.	19
<b>11</b>	<b>OFF-SCOPE ISSUES</b>	
11.1	Commentors submit various comments on the DEIS for Winter Use.	6
11.2	Commentors make various off-scope statements such as: * Visitors degrade park resources by littering and disobeying laws within park boundaries.	30
<b>12</b>	<b>PERSONAL OBSERVATIONS</b>	
12.1	Commentors make observations based on personal experiences in the national parks and/or out of doors.	102
12.2	Commentors commend NPS for various actions including: · Efforts to protect the national parks.	3
<b>13</b>	<b>QUESTIONS REGARDING THE DATA OR ANALYSES SUPPORTING THE PROPOSED RULE</b>	
13.1	Commentors question the analyses of sound and emissions impacts supporting the Proposed Rule.	5
13.2	Commentors question the lack of analysis in the DEIS of the existing exclusively	1

Draft Report: Public Comments on the Proposed Rule  
Yellowstone and Grand Teton National Parks and the John D. Rockefeller, Jr., Memorial Parkway

August 31, 2007

North Wind, Inc.

	nonmotorized activities available in the park compared to the limited opportunities for the motorized community. They state that it is imperative that the Proposed Rule properly analyzes the opportunities available to all users to show the balances in the types of winter recreational opportunities.	
13.3	Commentors state they do not believe that the analysis supporting the Proposed Rule properly considered the long-term socioeconomic impacts to gateway communities and/or cumulative environmental impacts to forest system lands.	2
13.4	Commentors object to references in the Proposed Rule to the 2000 FEIS and subsequent Record of Decision because they were invalidated by the Wyoming District Court.	1
13.5	Commentors state they do not believe that the analysis supporting the Proposed Rule properly considered the long-term impacts from climate change on winter activities in the parks; they recommend that plans be reevaluated every few years so routes with insufficient snow could be closed to visitors. Commentors request that NPS publish the cost per winter user of maintaining oversnow routes and how the plan will adapt as the climate warms.	3
13.6	Commentors state that the following statement on page 27510 of the Proposed Rule is not true for communities and businesses in Park County: "The preferred alternative also supports the communities and businesses both near and far from the park and will encourage them to have an economically sustainable winter recreation program that relies on a variety of modes and access to the parks in the winter."	2
13.7	Commentors state the Proposed Rule is incomplete because the analysis did not properly consider recent studies showing that snowcoaches and snowmobiles can have the same extremes in emissions - both high and low. Some add that the Proposed Rule cites studies not cited in the DEIS.	1
13.8	Commentors state the analysis is inconsistent because it uses historic snowmobile use levels as the baseline for some resources but does not use that baseline for the economic analysis.	1
13.9	Commentors express concern about inconsistencies in the health and safety analysis for alternatives that would allow nonmotorized 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.	1
<b>Total Number of Comments Generated:</b>		<b>10,054</b>

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### Number of Commentors from "Gateway Communities"

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State	City	Number of Commentors	Number of Letters
ID	Island Park	1	1
MT	West Yellowstone	7	9
WY	Cody	2	2
WY	Jackson	12	13
<b>Totals *</b>		<b>22</b>	<b>25</b>

\* Some commentors submitted multiple letters, and some letters had multiple signatures. Therefore, totals for letters and commentors may differ.

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## Number of Form Letter and non-Form Letter Commentors

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<b>Letter Type</b>	<b>Number of Commentors</b>
Form Letters	605
non-Form Letters	845
<b>Totals *</b>	<b>1,450</b>

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

### Number of Commentors for Each Form Letter

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Letter Type	Number of Commentors
FL-1	70
FL-2	57
FL-3	236
FL-4	264
<b>Total:</b>	<b>627</b>

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

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### Number of Commentors that Responded via the Web or US Mail, for Form Letters and Nonform Letters

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Letter Type	US Mail	Web	Number of Commentors
Non Form	827	18	845
FL-1	70	0	70
FL-2	56	1	57
FL-3	235	1	236
FL-4	252	13	265
<b>Total *</b>	<b>1,440</b>	<b>33</b>	<b>1,473</b>

\* Some commentors sent in a hardcopy letter AND submitted a web letter. Therefore, they are counted twice in this report.



### Number of Commentors - By State, Position

Form Letters			
State	Pro Rule	Unclear	Anti-Rule
AK	0	1	0
AL	0	1	0
AZ	0	2	3
CA	0	16	16
CO	0	48	2
CT	0	2	0
FL	0	1	1
GA	0	0	3
IA	0	26	1
ID	0	8	1
IL	0	21	3
IN	0	4	1
KS	0	0	1
KY	0	1	1
LA	0	0	1
MA	0	17	1
MD	0	0	1
ME	0	0	1
MI	0	47	0
MN	0	111	1
MO	0	2	1
MT	0	15	0
NC	0	0	2
ND	0	28	0
NE	0	7	0
NH	0	10	1
NJ	0	1	2
NM	0	2	0
NV	0	6	0
NY	0	8	3
OH	0	6	1
OR	0	5	3
PA	0	6	2
PR	0	0	1
SC	0	0	1
SD	0	11	0
TN	0	2	0

<b>Form Letters</b>			
<b>State</b>	<b>Pro Rule</b>	<b>Unclear</b>	<b>Anti-Rule</b>
TX	0	0	4
UT	0	13	1
VA	0	0	1
VT	0	12	0
WA	0	8	2
WI	0	52	0
WV	0	0	0
WY	0	14	0
OTHER	0	21	7
<b>Totals *</b>	0	535	70

<b>Nonform Letters</b>			
<b>State</b>	<b>Pro-Rule</b>	<b>Unclear</b>	<b>Anti-Rule</b>
AK	0	0	3
AL	0	0	2
AR	0	0	2
AZ	0	0	15
CA	0	1	122
CO	0	1	30
CT	0	0	11
DC	1	0	6
DE	0	0	2
FL	0	0	40
GA	0	0	9
HI	0	0	7
IA	0	1	2
ID	0	2	6
IL	0	0	24
IN	0	0	9
KS	0	0	6
KY	0	0	5
MA	0	0	23
MD	0	0	16
ME	0	0	5
MI	0	2	16
MN	2	0	18
MO	0	0	13
MS	0	0	2
MT	4	6	7
NC	0	0	26

Draft Report: Public Comments on the Proposed Rule  
Yellowstone and Grand Teton National Parks and the John D. Rockefeller, Jr., Memorial Parkway

August 31, 2007

North Wind, Inc.

<b>Nonform Letters</b>			
<b>State</b>	<b>Pro Rule</b>	<b>Anti-rule</b>	<b>Unclear</b>
NE	0	0	2
NH	0	0	6
NJ	0	1	13
NM	0	1	11
NV	0	0	6
NY	0	0	56
OH	0	0	19
OK	0	0	4
OR	0	1	29
PA	0	0	29
PR	0	0	2
RI	0	0	4
SC	0	0	6
SD	0	0	2
TN	0	0	13
TX	0	1	34
UT	0	0	6
VA	0	1	17
VI	0	0	2
VT	0	0	5
WA	0	4	55
WI	0	3	16
WV	0	0	2
WY	0	6	6
OTHER	0	5	24
<b>Totals *</b>	<b>7</b>	<b>36</b>	<b>796</b>

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

## Form Letters

Letter ID	Correspondence Text
FL-1	<p>I am writing in regard to the National Park Service's plans to change the regulation of snowmobile use in Yellowstone National Park.</p> <p>Despite three Park Service studies finding that current snowmobile use is damaging Yellowstone -- and despite protests from nearly all former NPS directors -- I understand that the National Park Service's preferred plan is to allow a threefold increase in snowmobile use in the park.</p> <p>I urge the National Park Service to reject this "preferred alternative" and to instead adopt "Alternative 2," which would phase out the use of snowmobiles in favor of snowcoaches.</p> <p>Thank you for your time.</p>
FL-2	<p>Dear Rule Makers:</p> <p>I am writing in regard to the Winter Use Proposed Rule for Grand Teton and Yellowstone National Parks and the John D. Rockefeller, Jr., Memorial Parkway. I support the continued use of snowmobiles for winter transportation in these parks.</p> <ol style="list-style-type: none"><li>1. The rule should be amended to allow at least 20% of Yellowstone's daily snowmobiles entries to be led by a non-commercial guide who has taken a short training course.</li><li>2. The daily snowcoach limit of 78 per day proposed is too high and should be reduced to fewer than 50 per day. This should better utilize empty seats in existing snowcoaches, currently averaging just 29 per day entering the park with an average of only 7.5 riders per coach.</li><li>3. I support the section of the rule which will finally require snowcoaches to meet emissions and sound requirements. However, "beginning in the 2011-2012 season" is too long of a phase-in period. Two years advance notice should be more than sufficient.</li><li>4. The maximum commercial snowmobile group size should remain at 11 (10 plus 1 guide) versus being decreased to 8 as proposed by this rule.</li><li>5. Sylvan Pass provides important access to Yellowstone through the East Entrance. Therefore I would request Sylvan Pass be kept open to snowmobile and snowcoach traffic.</li><li>6. The Yellowstone side-roads provide opportunities for visitors to view the beauty of the park. I support re-opening these road segments to snowmobiles in the afternoons.</li></ol> <p>Thank you for this opportunity to comment.</p>
FL-3	<p>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 Rule on Winter Use in the Yellowstone and Grand Teton National Parks.</p> <ol style="list-style-type: none"><li>1. Please allow a small percentage of daily entrances into Yellowstone Park by noncommercially 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.</li><li>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.</li><li>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.</li><li>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 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.</li></ol> <p>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.</p>

Letter ID	Correspondence Text
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**FL-4** I am writing in regard to the Winter Use Proposed Rule (Regulatory Information Number 1024-AD55) for Grand Teton and Yellowstone National Parks and the John D. Rockefeller, Jr., Memorial Parkway. I support the continued use of snowmobiles for winter transportation in these parks and urge that you blend several pieces of Alternatives 1, 4 and 5 of the associated DEIS to create a revised final rule that will provide a better long-term management plan for the parks that considers the following:

The rule should be amended to allow at least 20% of Yellowstone's daily snowmobile entries to be led by a non-commercial guide (Certified Group Leader) who has taken a short training course to prepare them for taking private snowmobile groups into Yellowstone. The requirement that 100% of snowmobile groups be led by commercial guides remains objectionable and has been harmful since it has resulted in a 50% decline in winter visitation.

The daily snowcoach limit of 78 per day proposed for Yellowstone in Table 1 to Section 7.13 is too high and should be reduced to fewer than 50 per day. This will help to better utilize empty seats in existing snowcoaches which currently average just 29 per day entering the park, with an average of only 7.5 riders per coach. Snowcoaches are extremely heavy and their operation can adversely impact the quality of the groomed snow roads in the park. Therefore, minimizing empty or half-full coaches will help improve the quality of the visitor's experience while better protecting the investment in the park's groomed roads.

I support the section of the rule which will finally require snowcoaches to meet emissions and sound requirements for operation in the parks. However, "beginning in the 2011-2012 season" is too long of a phase-in-period which will result in unnecessary impacts from snowcoaches to the park's resources. Two years advance notice (versus four years as proposed by this rule) should be more than sufficient for snowcoach operators to conform to these new requirements. Therefore, I request that you consider implementation of snowcoach BAT requirements beginning with the 2009-2010 season.

The maximum snowmobile group size should remain at 11 (10 plus 1 guide) versus being decreased to 8 as proposed by this rule. The final rule should also consider a minimum group size that is larger than 2, as well as consider managing snowmobiles in the three parks by a daily limit on snowmobile groups.

The rule should be revised to allow any 2007 and newer model year snowmobile (defined by the DEIS as "EPA Compliant Snowmobile") on the Grassy Lake Road, the Continental Divide Snowmobile Trail (CDST), and Jackson Lake in Grand Teton and the Parkway. The final rule should also consider managing the CDST and the Grassy Lake Road as one unit with the primary focus being for CDST through-trips associated with adjacent national forest trails.

The final rule should be revised to keep Sylvan Pass open to snowmobile and snowcoach traffic.

I support re-opening the Yellowstone side-roads to snowmobiles as proposed by this draft rule.