

Yellowstone National Park – Winter Use Plan DEIS  
P. O. Box 168  
Yellowstone National Park, WY 82190

Dear Winter Use Planning Team:

I am opposed to Alternatives 1 (No Action) and 5 (Snowcoach only) because they would not provide the range of winter access to Yellowstone National Park the American public desires.

I support continued snowmobile access to Yellowstone and urge you to blend pieces of Alternatives 2, 3, 6 and 7 to create a better long-term management plan that considers the following:

**Include a Non-Commercial Guide Option:** Certified Group Leaders who have taken a short training course should be allowed to take snowmobile groups into Yellowstone. It is wrong and objectionable to require that all snowmobilers must be led by a commercial guide. Please allow at least 20% of daily snowmobiles entries to be led by a non-commercial guide. Yellowstone is a public park and it is wrong that my access can only be through a commercial business.

**The proposal that all OSVs must enter Yellowstone by 10:30 AM should be eliminated.** This makes no sense since it would concentrate both snowmobile and snowcoach groups into an unrealistic small timeframe. This will create unnecessary crowding and result in increased overall sound levels. It would also make it more difficult for outfitters from Jackson and Cody to safely and effectively have their clients into the park prior to the gates being closed, particularly when weather or road conditions are less than ideal.

**Variable Entrance Allocations will not work and should be eliminated.** While allowing the sharing of daily snowmobile and snowcoach entries between entrances sounds good, it is totally impractical. There is a very limited quantity of approved BAT snowmobiles in the Yellowstone area since all snowmobiles must be BAT compliant. If daily entries are to be transferred from one gate to another, it means that a commensurate number of extra BAT snowmobiles must also be on-hand at that alternate entrance or else there can be no ‘transferred’ snowmobile entries. It would be difficult and expensive to transfer extra BAT snowmobiles between the south, east, west or north entrances given logistics and winter travel conditions. The availability of spare BAT snowmobiles is also worsened by Yellowstone only certifying BAT snowmobiles until they are 6 years old.

**Variable Daily Snowmobile Limits should not be used on a random, rotating basis.** Variable daily snowmobile entry numbers, operated on a random, rotating basis as described in Alternative 7 will at some point in the rotation lead to significantly lower Yellowstone visitation. Since this random assignment could assign ‘low entry’ levels to what have been historic peak days such as over a holiday weekend or between Christmas and New Years (which at some point it *will do*), total visitation will plummet and be an absolute killer to winter businesses and local economies.

**NOx Standards for Snowmobiles should not be set by NPS.** When EPA regulations were initially established for snowmobile engines in 2002 they included a NOx component. However NOx was subsequently removed from EPA snowmobile engine regulations through judicial action. It is also difficult and expensive to isolate NOx in emission testing. It is inappropriate to include a standard that has been excluded by scientific review and a legal ruling.

Sincerely,

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Printed Name

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Signature

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Mailing Address

City

State

Zip Code