



# **Yellowstone National Park**

## **Winter Use Plan/Environmental Impact Statement Draft Public Scoping Comment Analysis**

### **SUMMARY**

July, 2010



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## INTRODUCTION AND GUIDE

### INTRODUCTION

In the winter of 2010, Yellowstone National Park (Yellowstone or the park) initiated scoping with the publication of a Notice of Intent to Prepare a Winter Use Plan and Environmental Impact Statement in the *Federal Register* on January 29, 2010. The park also released a Public Scoping Brochure and activated the project on the National Park Service (NPS) Planning, Environment and Public Comment (PEPC) website (<http://parkplanning.nps.gov/yell>). In addition to being available online, the brochures were mailed and emailed to a list of park stakeholders and were available at a series of public scoping meetings. The public was invited to submit comments on the scope of the planning process (purpose, need, objectives, and range of alternatives) from January 22, 2010, through March 30, 2010.

During the scoping period, five public scoping open houses were held at the following locations:

February 16, 2010: Hilton Garden Inn in Idaho Falls, Idaho

February 18, 2010: Hilton Garden Inn in Billings, Montana

March 15, 2010: Little America Hotel in Cheyenne, Wyoming

March 17, 2010: Old Post Office Pavilion in Washington, DC

March 22, 2010: Cody Club Room of the Cody Auditorium in Cody, Wyoming

Park staff was on hand at all five meetings to answer questions and provide additional information to open house participants. During the scoping period, 1,689 pieces of correspondence were entered into the PEPC system, either from direct entry by the commenter, or uploading of hard copy letters, and comment forms sent in by the public. In addition, 7,410 form letters were submitted electronically on CDs. Therefore, in total, 9,099 pieces of correspondence were received during scoping.

### THE COMMENT ANALYSIS PROCESS

Comment analysis is a process used to compile and correlate similar public comments into a format that can be used by decision makers and the Interdisciplinary Team (IDT). Comment analysis assists the team in organizing, clarifying, and addressing technical information pursuant to *National Environmental Policy Act* (NEPA) regulations. It also aids in identifying the topics and issues to be evaluated and considered throughout the planning process.

The process includes five main components:

developing a coding structure

employing a comment database for comment management

reading and coding of public comments

interpreting and analyzing the comments to identify issues and themes

preparing a comment summary

A coding structure was developed to help sort comments into logical groups by topics and issues. The coding structure was derived from an analysis of the range of topics discussed during internal NPS scoping, past planning documents, and the comments themselves. The coding structure was designed to capture all comment content rather than to restrict or exclude any ideas.

The NPS PEPC database was used for management of the comments. The database stores the full text of all correspondence and allows each comment to be coded by topic and issue. Outputs from the database include the total number of correspondences and comments received, sorting and reporting of

comments by a particular topic or issue, and demographic information for the sources of the comments.

Analysis of the public comments involved the assignment of the codes to statements made by the public in their letters and written comment forms. All comments were read and analyzed, including those of a technical nature; opinions, feelings, and preferences of one element or one potential alternative over another; and comments of a personal or philosophical nature.

Although the analysis process attempts to capture the full range of public concerns, this content analysis report should be used with caution. Comments from people who chose to respond do not necessarily represent the sentiments of the entire public. Furthermore, this was not a vote-counting process, and the emphasis was on the content of the comment rather than the number of times a preference was expressed.

Several organizations submitted letters electronically on compact disks. These totaled approximately 7,400 correspondences. The letters were reviewed, and comments from non-form letters were entered into the PEPC system. The form letters were coded and entered into the PEPC system as a group.

### **DEFINITION OF TERMS**

Primary terms used in the document are defined below.

**Correspondence:** A correspondence is the entire document received from a commenter. It can be in the form of a letter, written comment form, note card, open house transcript, or petition.

**Comment:** A comment is a portion of the text within a correspondence that addresses a single subject. It could include such information as an expression of support or opposition to the use of a potential management tool, additional data regarding the existing condition, or an opinion debating the adequacy of an analysis.

**Code:** A grouping centered on a common subject. The codes were developed during the scoping process and were used to track major subjects.

**Concern:** Concerns are statements that summarize the issues identified by each code. Each code was further characterized by concern statements to provide a better focus on the content of comments. Some codes required multiple concern statements, while others did not. In cases where no comments were received on an issue, the issue was not identified or discussed in this report.

**Quotes:** Representative quotes that have been taken directly from the text of the comments received from the public and further clarify the concern statements. Quotes have not been edited for grammar.

### **GUIDE TO THIS DOCUMENT**

This Summary is organized as follows.

**Content Analysis Report:** This is the basic report produced from PEPC that provides information on the numbers and types of comments received, organized by code. The first section of the report provides a summary of the number of comments that were coded under each topic. The second section provides general demographic information, such as the states where commenters live, the number of letters received from different categories of organizations, etc.

**Public Scoping Comment Summary:** This summarizes the comments received during the scoping process. These comments are organized by codes and further organized into concern statements.

## CONTENT ANALYSIS REPORT

**Table 1: Comment Distribution**

**(Note: Each comment may have multiple codes. As a result, the total number of comments may be different than the actual comment totals)**

Code	Description	# of Comments	% of Comments
AE12000	Affected Environment: Wildlife And Wildlife Habitat	208	1.49%
AE21000	Affected Environment: Socioeconomics	259	1.86%
AE22500	Affected Environment: Visitor Use and Experience	423	3.04%
AE30000	Affected Environment: Health and Safety	19	Less than 1%
AE7000	Affected Environment: Air Quality	64	Less than 1%
AE8000	Affected Environment: Visual Quality	64	Less than 1%
AE8100	Affected Environment: Soundscapes	121	Less than 1%
AE8500	Affected Environment: Park Operations	20	Less than 1%
AE9500	Affected Environment: General/Other	41	Less than 1%
AL4050	Alternatives: No Action (No OSV Use)	1	Less than 1%
AL4060	Alternatives: No Action (No OSV use) (Non-substantive)	9	Less than 1%
AL5000	Alternatives: Continue Recent Use Levels	79	Less than 1%
AL5005	Alternatives: Keep the park open to OSV use (either snowmobiles or snowcoaches)	418	3.00%
AL5010	Alternatives: Support More Snowmobiles	65	Less than 1%
AL5015	Alternatives: Support Less Snowmobiles	48	Less than 1%
AL5020	Alternatives: Support More Snowcoaches	22	Less than 1%
AL5025	Alternatives: Support Less Snowcoaches	23	Less than 1%
AL5030	Alternatives: Support Snowcoach Only	7,332*	52.63%
AL5040	Alternatives: Support No Snowmobile Access	237	1.70%
AL5050	Alternatives: Support No Snowcoach Access	10	Less than 1%
AL5060	Alternatives: Support Unlimited Snowmobile Access	8	Less than 1%
AL5065	Alternatives: Support more access (general)	311	2.23%
AL5068	Alternatives: Support less access (general)	39	Less than 1%
AL5069	Alternatives: Support no access (general)	49	Less than 1%
AL5070	Alternatives: Non-guided OSV Use	122	Less than 1%

*Yellowstone Winter Use Plan/EIS Draft Public Scoping Comment Analysis Summary*

<b>Code</b>	<b>Description</b>	<b># of Comments</b>	<b>% of Comments</b>
AL5075	Alternatives: Non-commercially guided OSV Use	455	3.27%
AL5080	Alternatives: Adjustable OSV Caps	477	3.42%
AL5090	Alternatives: Plow Roads	424	3.04%
AL5095	Alternatives: Transition Period	423	3.04%
AL5098	Alternatives: Gate Allocations	404	2.90%
AL6000	Alternatives: Support Snowmobiles Using Sylvan Pass and East Entrance	23	Less than 1%
AL6010	Alternatives: Oppose Snowmobiles Using Sylvan Pass and East Entrance	24	Less than 1%
AL6020	Alternatives: Best Available Technology (BAT)	106	Less than 1%
AL6030	Alternatives: Specific suggestions for a new OSV limit/level	106	Less than 1%
AL6040	Alternatives: Separate OSV use by days	1	Less than 1%
AL6050	Alternatives: Timed entry	3	Less than 1%
AL6060	Alternatives: Other suggested alternatives/alternative elements	279	2.00%
AL6070	Alternatives: Summer use	108	Less than 1%
AQ1000	Air Quality: Guiding Policies, Regs, Laws	0	Less than 1%
AQ2000	Air Quality: Methodology And Assumptions	38	Less than 1%
CC1000	Consultation and Coordination: General Comments	16	Less than 1%
GA1000	Impact Analysis: Impact Analyses	261	1.87%
GA3000	Impact Analysis: General Methodology For Establishing Impacts/Effects	2	Less than 1%
GA4000	Impact Analysis: Impairment	4	Less than 1%
GA5000	Impact Analysis: Unacceptable Impacts	2	Less than 1%
HS2000	Health and Safety: Methodology and Assumptions	1	Less than 1%
HS4000	Health and Safety: Impact of Proposal and Alternatives	5	Less than 1%
MT1000	Miscellaneous Topics: General Comments	54	Less than 1%
OI3000	Other Issues: Comment Period	1	Less than 1%
ON1000	Other NEPA Issues: General Comments	2	Less than 1%
PN2000	Purpose And Need: Park Purpose And Significance	75	Less than 1%
PN3000	Purpose And Need: Scope Of The Analysis	8	Less than 1%
PN4000	Purpose And Need: Park Legislation/Authority	10	Less than 1%
PN5000	Purpose And Need: Regulatory Framework	513	3.68%
PN7050	Purpose and Need: Comments on the Draft Purpose Statement	262	1.88%

Code	Description	# of Comments	% of Comments
PN7075	Purpose and Need: Comments on the Draft Need Statement	248	1.78%
PN8000	Purpose And Need: Objectives In Taking Action	545	3.91%
PN9000	Purpose And Need: Issues And Impact Topics Selected For Analyses	26	Less than 1%
PO2000	Park Operations: Methodology And Assumptions	15	Less than 1%
PO4000	Park Operations: Impact Of Proposal And Alternatives	3	Less than 1%
SE2000	Socioeconomics: Methodology And Assumptions	20	Less than 1%
SE3000	Socioeconomics: Study Area	1	Less than 1%
SE4000	Socioeconomics: Impact Of Proposal And Alternatives	10	Less than 1%
SS2000	Soundscapes: Methodology And Assumptions	20	Less than 1%
SS4000	Soundscapes: Impact of Proposal And Alternatives	4	Less than 1%
VA1000	Visitor Use and Experience: Guiding Policies, Regs And Laws	3	Less than 1%
VA2000	Visitor Use and Experience: Methodology And Assumptions	34	Less than 1%
VA4000	Visitor Use and Experience: Impact of Proposal And Alternatives	11	Less than 1%
VQ1000	Visual Quality: Guiding Policies, Regs And Laws	1	Less than 1%
WH1000	Wildlife And Wildlife Habitat: Guiding Policies, Regs And Laws	3	Less than 1%
WH2000	Wildlife And Wildlife Habitat: Methodology And Assumptions	21	Less than 1%
WH4000	Wildlife And Wildlife Habitat: Impact Of Proposal And Alternatives	7	Less than 1%
XX1000	Duplicate Correspondence/Duplicate Comment	144	1.03%
<b>Total</b>		<b>13,932</b>	

*\*denotes code for which form letters were received, 17 in total*

**Table 2: Correspondence by Type**

Type	# of Correspondences
Other	14
Web Form	1,499
Park Form	24
Letter*	7,562
<b>Total</b>	<b>9,099</b>

*\*Letter category includes 17 form letters, totaling 7,642 correspondences*



**Table 3: Correspondence by Organization Type**

<b>Organization Type</b>	<b># of Correspondences</b>
Town or City Government	8
Business	15
County Government	2
University/Professional Society	1
State Government	9
Conservation/Preservation	58
Recreational Groups	20
Non-Governmental	2
Civic Groups	5
Unaffiliated Individual	8,979
<b>Total</b>	<b>9,099</b>

*Note\*: Table includes 17 form letters containing a total of 7,642 signatures*

**Table 4: Correspondence Distribution By State**

<b>State</b>	<b>Percentage</b>	<b># of Correspondences</b>
AK	Less than 1%	9
AL	Less than 1%	3
AR	Less than 1%	7
AZ	Less than 1%	12
CA	2%	174
CO	1%	71
CT	Less than 1%	8
DC	Less than 1%	9
DE	Less than 1%	1
FL	Less than 1%	22
GA	Less than 1%	5
HI	Less than 1%	1
IA	Less than 1%	7
ID	1%	133

*Yellowstone Winter Use Plan/EIS Draft Public Scoping Comment Analysis Summary*

<b>State</b>	<b>Percentage</b>	<b># of Correspondences</b>
IL	1%	113
IN	Less than 1%	10
KS	Less than 1%	6
KY	Less than 1%	5
LA	Less than 1%	2
MA	Less than 1%	19
MD	Less than 1%	22
ME	Less than 1%	3
MI	1%	72
MN	1%	66
MO	Less than 1%	10
MS	Less than 1%	2
MT	4%	343
NC	Less than 1%	11
ND	Less than 1%	10
NE	Less than 1%	5
NH	Less than 1%	10
NJ	Less than 1%	12
NM	Less than 1%	10
NV	Less than 1%	24
NY	Less than 1%	31
OH	Less than 1%	13
OK	Less than 1%	6
OR	Less than 1%	34
PA	Less than 1%	18
RI	Less than 1%	2
SC	Less than 1%	4
SD	Less than 1%	23
TN	Less than 1%	9
TX	Less than 1%	28
Unknown	77%	7,005

State	Percentage	# of Correspondences
UT	1%	105
VA	Less than 1%	17
VT	Less than 1%	5
WA	4%	332
WI	Less than 1%	40
WV	Less than 1%	1
WY	2%	177
<b>Total</b>		<b>9,099</b>

*Note: "Unknown" category represents anonymous form letters.*

**Table 5: Correspondence Distribution By Country**

Country	Percent	# of Correspondences
United Kingdom	Less than 1%	1
United States of America	99%	9,070
Canada	Less than 1%	26
Sweden	Less than 1%	1
Switzerland	Less than 1%	1
<b>Total</b>		<b>9,099</b>

## PUBLIC COMMENT SUMMARY

### *Yellowstone NP Comment Analysis--Proposed Interim Winter Use Rule 2009*

#### Index of Concern Statements

Code, Corresponding Concern ID, and Corresponding Concern Statement		Page #
<b><i>AL4050 - Alternatives: No Action (No OSV Use)</i></b>		
Concern ID: 23588	One commenter stated that the no-action alternative should be the current winter use plan, and should not represent a "no access" scenario.	27
<b><i>AL5070 - Alternatives: Non-guided OSV Use</i></b>		
Concern ID: 23589	Several commenters stated general support for an alternative that includes non-guided OSV use, specifically snowmobile use, in the park. Reasons for wanting this element as part of the alternatives included the desire to have more freedom in their experience, the high cost of having to rent a snowmobile, and increasing accessibility of the park.	27
Concern ID: 23590	Commenters requesting a non-guided element in the Winter Use Plan/EIS suggested that such a use could be allowed if non-guided users were certified and had gone through training/an educational component. Specific suggestions for how this could work included a permit system or lottery system.	30
Concern ID: 23591	Commenters suggested that non-guided snowmobile use should be allowed, provided that the snowmobiles meet BAT requirements.	32
Concern ID: 23592	Commenters suggested that non-guided OSV use would not impact park resources if there was increased law enforcement.	32
Concern ID: 23593	One commenter stated that the option of non-guided use should not be included in the plan/EIS as it would likely be litigated.	33
Concern ID: 23594	Commenters suggested that non-guided OSV use, specifically snowmobile use, could occur in the park on certain road, during certain times, or by providing the concessioners a certain number of un-guided machines in their daily limit.	33
Concern ID: 23596	One commenter suggested that non-guided snowmobile use could be managed through the use of GPS units on the machines that would track anyone who went off of the road.	34
<b><i>AL5075 - Alternatives: Non-commercially guided OSV Use</i></b>		
Concern ID: 23597	Several commenters stated support for an alternative element that would allow individuals to become a non-commercial guide after some level of training has been completed. Some specific suggestions for training were suggested including using the on line "Safe Rider Awareness Program" and involvement in the park and snowmobile community before becoming a non-commercial guide.	35

Code, Corresponding Concern ID, and Corresponding Concern Statement		Page #
Concern ID: 23598	<p>Commenters suggested that the park include an alternative that looks at a "Certified Leader" pilot project. Commenters stated that this concept was considered in past planning processes and should be considered in this process. Specific suggestions included:</p> <ul style="list-style-type: none"> <li>- education requirements for the guide</li> <li>- a specific maximum group size of 6 (including the leader) and a minimum group size of four</li> <li>- management of such a program working with commercial guided snowmobile operations to track the numbers of non-commercially guided snowmobiles into the park</li> <li>- an initial limit of 18-24 snowmobiles per day with a Certified Leader, that could increase based on adaptive management</li> </ul> <p>It was also suggested that if this concept is adopted, Certified Group Leaders should account for 25% of the daily snowmobile limit in the park.</p>	36
Concern ID: 23599	<p>Commenters provided suggestions for possible guides that were non-commercial. Specific suggestions included using park rangers as guides, and having local snowmobile club members trained as guides.</p>	40
Concern ID: 23600	<p>Commenters provided specific suggestions for the level of non-commercially guided OSV use that should occur in the park including:</p> <ul style="list-style-type: none"> <li>-720 snowmobiles a day, with 25% non-commercially guided</li> <li>-group size limit of 6 for non-commercially guided use</li> <li>- non-commercially guided use should be no less than 20% of overall daily limits</li> </ul>	41
<b><i>AL5080 - Alternatives: Adjustable OSV Caps</i></b>		
Concern ID: 23601	<p>Commenters suggested that the cap for OSVs be seasonal instead of daily. Some commenters further suggested a seasonal cap, with an additional daily cap not to exceed.</p>	41
Concern ID: 23602	<p>Commenters suggested that flexible OSV caps be implemented around peak use times. These suggestions included allowing more OSV during busy holiday periods (Christmas/New Years week, Martin Luther King Day, Presidents Day) to accommodate an increased demand during those periods. One specific suggestion was to allow up to 20% more OSV use on peak days, with no more than 20% of the days in the season identified as peak days.</p>	42
Concern ID: 23606	<p>Commenters suggested that an alternative model a variation of flexible daily entry based on a visitation curve, rather than assumption of 100% use. It was suggested that this type of analysis would result in a higher, and more accurate, OSV cap being set.</p>	45
Concern ID: 23607	<p>One commenter suggested that OSV caps be implemented on a weekly basis.</p>	46
Concern ID: 23608	<p>Some commenters felt that if flexible OSV use limits were implemented, that people may take advantage of this and only discuss/photograph the highest use days, in an effort to mischaracterize OSV use and in the future, lower OSV use levels.</p>	47

Code, Corresponding Concern ID, and Corresponding Concern Statement		Page #
Concern ID: 23609	Commenters provided general support for some sort of system that implements flexible caps on OSV use.	48
Concern ID: 23610	Commenters suggested having a snowmobile limit of 500 a day, and then a flexibly system where operators could exceed that number by 33% for 20 days, decrease use by 33% for 20 days, and maintain use at 500 for the rest of the season. This same concept was also suggested, with a base number of 490 snowmobiles a day. Some commenters felt that this concept was good, but 33% was too high and that the increased use days should be around 10% to 20%	48
Concern ID: 23613	One commenter suggested that OSV caps be flexible and based on air quality. Specifically, OSV use should be lower on inversion days, and higher on non-inversion days.	50
<b><i>AL5090 - Alternatives: Plow Roads</i></b>		
Concern ID: 23614	Several commenters stated general support for an alternative that considers plowing all or some of the roads in the park during the winter. Commenters stated that this would provide greater access and a lower cost option to be able to experience the park in the winter. These commenters did not suggested specific areas that should be plowed, or other specific elements related to this alternative.	50
Concern ID: 23615	Commenters stated that while they supported plowing the roads in Yellowstone during the winter, they did not think Dunraven Pass and Sylvan Pass should be plowed, due to safety reasons.	53
Concern ID: 23617	Several commenters suggested that specifically, the west side of the park should be plowed. Many of these stated that West Yellowstone to Old Faithful or Mammoth to Old Faithful should be the subject of plowing efforts.	53
Concern ID: 23619	Commenters stated that plowing the roads would be a less expensive option for the NPS than the current system of road grooming for OSV use. They further stated that the NPS plowing operations in the Lamar Valley to Cooke City show this is a viable option.	60
Concern ID: 23620	Commenters stated opposition to the concept of plowing the roads in Yellowstone in the winter. Reasons for concern included impacting the visitor experience, impacts to wildlife, and allowing the park the time to "recover" in the winter.	63
Concern ID: 23621	One commenter requested that the plan/EIS evaluate the cost of visitation on OSV vs. plowed roads.	65
Concern ID: 23622	One commenter suggested that the NPS has the opportunity to form a supportive coalition for plowing the roads, which would help the success of this alternative.	65
Concern ID: 23623	Commenters suggested specific requirements they felt would be necessary if wheeled vehicles were permitted in the park. These suggestions include: <ul style="list-style-type: none"> <li>- Mandatory chains</li> <li>- speed limit reductions</li> <li>- placing a limit on the number of private cars permitting in the park each day</li> <li>- implement road closures when conditions are too hazardous</li> </ul>	65

Code, Corresponding Concern ID, and Corresponding Concern Statement		Page #
	<ul style="list-style-type: none"> <li>- a requirement for four wheel drive vehicles</li> <li>- implementing night time closures</li> </ul>	
Concern ID: 23624	<p>Commenters noted concern about the impacts of plowing on the park's wildlife. Specific areas of concern included added stress during the winter from more vehicles and changing the movements of the animals either from easier access on roads or from large snow berms created from plowing.</p> <p>Other commenters felt this was not a concern as the wildlife are not impacted during the summer when there are vehicles in the park and that wildlife in the Lamar Valley do not seem impacted by winter vehicle use.</p>	67
Concern ID: 23625	<p>Commenters suggested certain amenities that they would like to see under an alternative with road plowing such as: addition parking lots, extended hours for concessionaires to service increased visitation, and keeping the park open in November.</p>	69
Concern ID: 23626	<p>Commenters asked that a range of possible scenarios for an alternative that includes road plowing be considered, and provided suggestions for that range.</p>	70
Concern ID: 23629	<p>Commenters suggested that if wheeled vehicles are allowed in Yellowstone in the winter, they should be transit/bus vehicles only and that private vehicle use should not be permitted.</p>	70
Concern ID: 23630	<p>While in support of road plowing in certain areas of the park, commenters suggested areas they felt should not be plowed including:</p> <ul style="list-style-type: none"> <li>- east side of the park</li> </ul>	71
Concern ID: 23632	<p>Commenters requested specific portions of road to be plowed under the Winter Use Plan including:</p> <ul style="list-style-type: none"> <li>- the 10 mile section of Highway 212 from Cooke City to Pilot Creek</li> <li>-Colter Pass</li> <li>-the 11 miles between Cooke City and 296</li> </ul>	72
Concern ID: 23633	<p>Commenters raised questions related to plowing and park operations and visitor use they felt should be addressed in the plan/EIS. These questions included: where do funds for plowing come from; how can the park keep up with snowfall during heavy snow years; how would visitation be impacted if roads could not be opened on time; how will the park address damage to the road base; the impact of traffic jams in the winter; will there be adequate services for winter visitors; what would operating hours of the park be, as well as question related to what the visitor can see/do in the winter in a vehicle and how the park can manage this use in the winter.</p>	73
Concern ID: 23635	<p>Commenters suggested various alternative scenarios that provided a mix of OSV and wheeled vehicle use in the park during the winter.</p>	76
Concern ID: 23637	<p>Commenters raised questions related to health and safety they felt should be considered in the plan/EIS. These include: are visitors/employees safer in cars with airbags than on OSV; would there be numerous road closures for hazardous conditions; and how would visitors in adverse conditions be accommodated.</p>	78

<b>Code, Corresponding Concern ID, and Corresponding Concern Statement</b>		<b>Page #</b>
Concern ID: 23638	One commenter requested clarification on if private vehicles would be permitted under an alternative with road plowing, or if there would be a requirement for commercial vehicles only.	79
Concern ID: 23639	Commenters requested that the plan/EIS include an alternative that combines plowing the west side of the park with a Certified Leader/EPA compliant snowmobile component.	79
Concern ID: 23641	Commenters suggested that the NPS include an "all season alternative," which includes a combination of plowed roads and bus access.	80
Concern ID: 23642	One commenter requested that if a plowed road option is include, that it permit private cars and not require a concessioner for access.	81
<b><i>AL5095 - Alternatives: Transition Period</i></b>		
Concern ID: 23643	Commenters requested that there be a one-year transition period before any new regulations take effect to allow businesses and visitors to plan for any changes in management.	82
<b><i>AL5098 - Alternatives: Gate Allocations</i></b>		
Concern ID: 23644	Commenters requested flexibility in how OSV numbers are allocated between gates. Some suggested that if one gate knew in advance they would not use their allocation, those numbers could be transferred to another gate.	84
Concern ID: 23645	One commenter suggested a change in the way the allocation for the west gate is calculated.	84
<b><i>AL6000 - Alternatives: Support Snowmobiles Using Sylvan Pass and East Entrance</i></b>		
Concern ID: 23646	Commenters requested that Sylvan Pass and the East Gate remain open, with some suggesting the time it is open in the winter be extended.	85
Concern ID: 23647	One commenter requested that the plan/EIS evaluate the cost associated with managing Sylvan Pass in the winter, as well as safety issues.	87
Concern ID: 23648	Commenters suggested that the concerns to close Sylvan Pass due to avalanche concerns were not founded.	87
<b><i>AL6010 - Alternatives: Oppose Snowmobiles Using Sylvan Pass and East Entrance</i></b>		
Concern ID: 23649	Commenters requested that the plan/EIS include an alternative that closes Sylvan Pass and the East Gate due to health and safety issues, as well as environmental impacts.	88
<b><i>AL6020 - Alternatives: Best Available Technology (BAT)</i></b>		
Concern ID: 23650	Commenters provided general support for BAT requirements for OSV operating in the park.	89



<b>Code, Corresponding Concern ID, and Corresponding Concern Statement</b>		<b>Page #</b>
Concern ID: 23651	Commenters requested that BAT requirements for snowcoaches be included in the Winter Use Plan. Specific suggestions included noise, weight, and size limits for snowcoaches.	90
Concern ID: 23652	One commenter suggested that zero emissions snowmobiles be permitted in the park.	91
Concern ID: 23653	Commenters suggested that any EPA Compliant snowmobile be considered BAT.	91
Concern ID: 23654	Commenters suggested that what constitutes BAT be revisited. Suggestions included allowing any 4-stroke snowmobile to qualify as BAT, as well as allowing all snowmobile of a certain age (models 5 years or newer for example) to qualify as BAT.	94
Concern ID: 23655	Commenters requested that an exemption from BAT and guiding requirements on Cave Falls Road be carried throughout the alternatives. An exemption from these requirements specifically on Grassy Lake Road to Flagg Ranch was also requested	96
Concern ID: 23656	Commenters suggested that BAT should not be included in the Winter Use Plan, with some feeling that it is too expensive of a requirement.	97
Concern ID: 23657	Commenters requested that EPA compliant snowmobiles be allowed on the Continental Divide Trail and on Jackson Lake.	98
Concern ID: 23658	Commenters stated that the soundscape needed to be improved to comply with the 1974 plan, which would include noise from individual snowmobiles and snowcoaches.	99
Concern ID: 23659	One commenter requested that all snowmobiles be 4-stroke, with no exceptions.	99
<b><i>AL6030 - Alternatives: Specific suggestions for a new OSV limit/level</i></b>		
Concern ID: 23660	<p>Commenters suggested that the OSV cap be revised to allow more than the current level of use. Specific suggestions included:</p> <ul style="list-style-type: none"> <li>- 1,000 per day</li> <li>- 425 snowmobiles and 50 coaches</li> <li>- 520 snowmobiles</li> <li>- 700 snowmobiles</li> <li>- 540 snowmobiles, 78 snowcoaches</li> <li>- 720 to 540 snowmobiles</li> <li>- 720 snowmobiles (with 25% non-commercially guided)</li> <li>- 490 snowmobiles</li> <li>- 500 snowmobiles</li> <li>- Average number of machines in 2002 at each entrance, divided by 2</li> <li>- 350 to 450 snowmobiles</li> <li>- 750 snowmobiles</li> <li>- 750 to 950 snowmobiles</li> </ul>	99

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	<ul style="list-style-type: none"> <li>- 1,400 (25% private)</li> <li>- 800 to 1,000 snowmobiles</li> <li>- 1,500 snowmobiles</li> <li>- 600 snowmobiles</li> </ul>	
Concern ID: 23662	<p>Commenters suggested specific levels of snowcoach access they would like to see. Suggestions included:</p> <ul style="list-style-type: none"> <li>- 25 at the West entrance, 25 at the North entrance, 15 at the South entrance, and 10 at the East entrance</li> <li>- 12 snowcoaches per day</li> </ul>	103
Concern ID: 23664	<p>One commenter suggested a range of alternatives that should be evaluated that would look at a range of use numbers. This range included current use, current peak use, more use than current and less use than current.</p>	104
Concern ID: 23665	<p>Commenters offered suggestion for use levels at specific entrance points. Suggestions included:</p> <ul style="list-style-type: none"> <li>-30 daily entries at the East entrance</li> <li>-55% at the West entrance</li> <li>-50 daily entries at the East entrance</li> </ul>	105
Concern ID: 23667	<p>Commenters requested that the Winter Use Plan consider numbers less than currently allowed, specifically looking at less than 200 OSV or less per day. Another suggested limiting use to 10 tours per day in the park, with 5 snowmobiles per tour.</p>	105
<b><i>AL6040 - Alternatives: Separate OSV use by days</i></b>		
Concern ID: 23670	<p>One commenter suggested having specific snowmobile-free days.</p>	106
<b><i>AL6050 - Alternatives: Timed entry</i></b>		
Concern ID: 23671	<p>Commenters stated support for establishing timed entry into the park for OSV in order to address concerns related to the soundscapes.</p>	106
<b><i>AL6060 - Alternatives: Other suggested alternatives/alternative elements</i></b>		
Concern ID: 23672	<p>Commenters requested that the park add additional tours/programs related to OSV use include snowmobile tours that originate at Old Faithful, marketing the park as an educational destination, showing films related to the parks wildlife, hold "winter safaris", and having workshop retreats for artists.</p>	107
Concern ID: 23674	<p>Commenters requested that oversnow bikes be allowed at part of the Winter Use Plan.</p>	109
Concern ID: 23675	<p>One commenter requested that a "no shoot zone" be established around the park boundary.</p>	110
Concern ID: 23676	<p>Commenters requested an alternative that is geared more toward enhancing the non-motorized use experience. Suggestions included groomed trails, more signage at trailheads, segregated lanes for skiers, the addition of warming huts, and allowing non-motorized users free access.</p>	110
Concern ID: 23679	<p>Commenters suggested that the park implement an option for alternative transportation in the winter in the form of a shuttle, bus, trolley, or monorail.</p>	112

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Concern ID: 23681	Commenters requested that additional regulations for snowcoaches be put in place. These include a drag device for large (20+ passenger) snowcoaches, not allowing large snowcoaches, restrict snowmobiles and snowcoaches to the same number of passengers, and making sure the NPS has ridden in all snowcoaches.	116
Concern ID: 23682	Commenters requested that guides for snowmobile use count as administrative use, rather than part of the daily limit.	117
Concern ID: 23683	Commenters suggested changing the dates of winter use in the park. These suggestions included having the opening/closing dates not tied to a specific date, but rather a set day of the week (i.e. the third Monday in December), having the season from December 20 to March 10, extend the winter season a week, and only allow one week for plowing between winter seasons.	117
Concern ID: 23684	Commenters offered suggestions for changing how fees are charged in the winter at Yellowstone. Suggestions included: a grooming fee for everyone in place of an entrance fee, a fee that covers OSV management costs, charging a garbage disposal fee, concerns about paying a yearly fee and only being able to use the park half of the year, increasing fees, and having "fee free" times.	118
Concern ID: 23685	Commenters requested that the Winter Use Plan include adaptive management. Specific suggestions were to base use on historic numbers, with an allowance for growth and to only limit OSV numbers if impacts are shown.	120
Concern ID: 23686	Some commenters suggested closing Yellowstone in the winter. Specific suggestions were made as to specific areas/times that the park could close that included closing the Northern Range during harsh winters and closing the park a few days a week for recovery. Some commenters stated that if the park is closed to OSV use, it should be closed to all other non-motorized uses as well.	121
Concern ID: 23687	Commenters noted the need for access for those with disabilities, with one commenter suggesting this could be accomplished with dog sleds.	122
Concern ID: 23689	One commenter requested that wood fires be allowed in the winter.	122
Concern ID: 23690	One commenter suggested the use of horse and dog-drawn sleds in the park.	123
Concern ID: 23691	Commenters suggested that zoning of uses occur, with areas for snowmobile use for those who want to engage in that activity. Areas set aside for protection of wildlife were also suggested. Others suggested segmenting areas for OSV use, wheeled vehicle use, and no motorized vehicle use.	123
Concern ID: 23692	Commenters made suggestions for alternative elements that would reduce noise in the park. These suggestions included: requiring skiers to wear helmets with intercoms for talking, only licensing a few tour companies with low quotas, require multiple passenger snowmobiles, and establishing noise restrictions for visitors.	124
Concern ID: 23697	Commenters stated that increased law enforcement/rangers should be included in the Winter Use Plan. Increased fines for violators and well as removing violators from the park were suggested.	125
Concern ID: 23698	One commenter suggested that Wyoming, Idaho, and Montana residents be provided easier access.	126

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Concern ID: 23699	Commenters suggested limitations on when and where OSV should be used. These suggestions including no vehicles on the roads after sunset, allowing more visitation at Firehole Canyon Drive, and closing Fountain Flats/Freight Road to oversnow travel.	126
Concern ID: 23700	Commenters suggested new options for winter lodging in the park including cabins, limiting the amount of lodging provided in the park during the winter, more camping areas, and opening the Obsidian Dormitory.	127
Concern ID: 23705	Commenters suggested that OSV use occur with a guide and that training be provided to OSV users.	128
Concern ID: 23708	One commenter requested that more grooming occur and that more snow be stored to be used later in the season.	129
Concern ID: 23709	Commenters suggested that the speed limit be changed to 45 mph for OSV use.	129
Concern ID: 23710	Commenters suggested that OSV use be limited to administrative use only.	129
Concern ID: 23713	One commenter suggested that the park post the road conditions of Mammoth Road on a website.	130
Concern ID: 23715	Commenters suggested vehicle requirements for OSV including emissions tests and banning high powered machines.	130
Concern ID: 23718	Commenters suggested ways in which advances in technology could be incorporated into the Winter Use Plan. Suggestions included use of web cams to see more areas of the park, creating a plan that allows technology to be implemented in a timelier manner, and implementing technologies from the Clean Snow Competition.	131
Concern ID: 23720	One commenter requested that the West Yellowstone airport be kept open during the winter.	131
Concern ID: 23721	Commenters requested an alternative that includes more machine-groomed non-motorized trails around Old Faithful, with specific suggestions of what these trails would look like.	131
Concern ID: 23722	One commenter requested that concessionaire permits be provided for a longer period, at least six years.	132
Concern ID: 23723	One commenter suggested that Yellowstone enroll in the Wyoming State Trails program for snowmobiles.	133
Concern ID: 23724	Commenters requested that the Continental Divide Snowmobile trail remain open.	133
Concern ID: 23725	Commenters requested increased coordination with the community and other interest groups in the development of alternatives, with one commenter suggesting groups to be consulted with.	134
Concern ID: 23727	One commenter suggested the park could remain open in the winter but post times when no services are available.	135
Concern ID: 23728	One commenter suggested limiting backcountry use in the winter.	135
<b><i>AQ2000 - Air Quality: Methodology And Assumptions</i></b>		
Concern ID: 23729	Commenters requested that the plan/EIS analysis include the impact of snowmobiles on air quality. They requested snowmobiles vs. no snowmobiles be examined, as well as snowmobiles vs. snowcoaches and a cumulative impacts	136

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	analysis.	
Concern ID: 23730	Commenters requested that the EIS analysis of air quality compare winter use and summer use.	137
Concern ID: 23733	Commenters noted improvements in snowmobile technology in recent years. They suggested that the NPS segregate this new technology in its analysis and offered sources of information they felt the NPS should consult in its analysis.	138
Concern ID: 23736	Commenters suggested that the air quality analysis use information provided by Dr. Bishop in his 2006 publication, "In Use Emissions."	140
Concern ID: 23739	Commenters suggested modeling that should be completed for the air quality analysis in the plan/EIS. Suggestions included developing an Air Quality Monitoring Protocol that is vetted with an air quality working group, use of appropriate BAT emission factors for snowcoaches, and include a detailed discussion of historic air quality monitoring conducted in the park.	141
Concern ID: 23742	Commenters requested that the plan/EIS analysis include a more extensive assessment of greenhouse gas emissions and climate change than past planning documents.	142
Concern ID: 23745	Commenters question past data related to air quality analysis. Specific concerns included skewed data from misplaced air monitors and the modeling assumption of 100% use.	144
Concern ID: 23746	One commenter suggested the formation of an air quality working group to get larger stakeholder buy-in for the air quality analysis.	144
<b><i>CC1000 - Consultation and Coordination: General Comments</i></b>		
Concern ID: 23751	Commenters requested extensive public involvement and agency coordination in the Winter Use Planning process, with a specific suggestion to work with the Society of Automotive Engineers Clean Snowmobile Challenge.	145
Concern ID: 23754	Commenters suggested specific publications that should be consulted during the development that relate to coalition building and gaining public support.	146
<b><i>GA1000 - Impact Analysis: Impact Analyses</i></b>		
Concern ID: 23767	Commenters requested that the impact analysis use best available science, as well as assess making access available and affordable to visitors.	147
Concern ID: 23768	Commenters requested that the plan/EIS analysis look at context and intensity.	148
Concern ID: 23769	One commenter requested that the impact analysis develop a formula that considers the total loaded weight of a snowcoach compared to the surface area of the vehicle tracks in order to evaluate the impact from snowcoaches. Other commenters asked that the park look at the impact of snowmobiles vs. snowcoaches.	148
Concern ID: 23770	One commenter requested that the analysis of park resources consider the park as a whole, not just where OSV use occurs.	149

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Concern ID: 23773	Commenters asked that the impact analysis for this plan/EIS not be limited to those issues litigated or to information in previous planning documents. In addition, they requested that the baseline be no OSV use.	149
Concern ID: 23775	Commenters requested that the impact analysis of each alternative consider what uses are occurring and can or cannot be accommodated on adjacent federal lands. One commenter requested that this be reflected in the cumulative impacts analysis.	150
Concern ID: 23779	One commenter requested that the plan/EIS consider the low percentage of use that winter use represents in the impact analysis.	151
Concern ID: 23782	One commenter requested that where the analysis identifies impacts, appropriate mitigation measures be identified.	151
Concern ID: 23783	One commenter requested that the comments of people from the local area receive more weight those from other areas.	151
<b><i>GA3000 - Impact Analysis: General Methodology For Establishing Impacts/Effects</i></b>		
Concern ID: 23787	One commenter requested a range of areas that should be part of the impact analysis methodology for the plan/EIS such as how snowmobile impacts air, sound, and visitor use.	152
<b><i>GA4000 - Impact Analysis: Impairment</i></b>		
Concern ID: 23790	Commenters requested a plan that keeps the park unimpaired for future generations, with one commenter stating that they believe OSV use is an impairment.	152
Concern ID: 23791	Commenters stated they did not feel snowmobile use was an impairment of park resources.	153
<b><i>GA5000 - Impact Analysis: Unacceptable Impacts</i></b>		
Concern ID: 23796	One commenter stated that the NPS use of the unacceptable impact standard is a misstatement of the law.	153
Concern ID: 23797	One commenter stated that they believe the available research shows that snowmobiles cause an unacceptable impact.	154
<b><i>HS2000 - Health and Safety: Methodology and Assumptions</i></b>		
Concern ID: 23798	One commenter stated that a risk vs. reward analysis was not appropriate for the decision to keep (or not keep) Sylvan Pass open.	154
<b><i>HS4000 - Health and Safety: Impact of Proposal and Alternatives</i></b>		
Concern ID: 23799	Commenters suggested there would be beneficial impacts of plowing the roads to health and safety, with faster emergency response and lack of people driving on snow covered roads.	154
Concern ID: 23800	One commenter noted that they believed plowed roads would create a safety risk from and increased interaction between wildlife and vehicles.	155
<b><i>OI3000 - Other Issues: Comment Period</i></b>		

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Concern ID: 23801	One commenter requested that every citizen's comment receive equal weight in the plan/EIS.	155
<b><i>ON1000 - Other NEPA Issues: General Comments</i></b>		
Concern ID: 23802	One commenter stated that as part of the NEPA process, the NPS needs to explain why winter use is being limited, while summer use is not.	155
<b><i>PN3000 - Purpose And Need: Scope Of The Analysis</i></b>		
Concern ID: 23803	Commenters suggested that the scope of the analysis should include a comparison/analysis of summer use vs. winter use.	156
Concern ID: 23805	Commenters stated that the scope of the Winter Use Plan should be expanded to include a greater emphasis on non-motorized winter use (see also "Other Suggested Alternative Elements)	156
Concern ID: 23806	One commenter requested that the scope of the plan include winter use in Grant Teton National Park.	158
<b><i>PN4000 - Purpose And Need: Park Legislation/Authority</i></b>		
Concern ID: 23836	Commenters noted pieces of Yellowstone's legislation and authority they felt represented the need to provide for recreational uses in the park.	158
Concern ID: 23837	Commenters suggested that Yellowstone's legislation and authority does not provide for snowmobile use.	159
<b><i>PN5000 - Purpose And Need: Regulatory Framework</i></b>		
Concern ID: 23843	Commenters stated that the mandate of the park service to "promote" and "provide for the use and enjoyment" of the park resources needs to be balanced with leaving these resources unimpaired when making management decisions.	160
Concern ID: 23844	Commenters stated that the regulatory framework in which the park was established provides for access to the park, including snowmobile use.	160
Concern ID: 23845	Commenters stated that various NPS policies and regulations mandate that snowmobiles not be allowed in the park. Some of the acts cited include the Organic Act, as well as NPS management policies.	161
<b><i>PN7050 - Purpose and Need: Comments on the Draft Purpose Statement</i></b>		
Concern ID: 23846	Commenters stated the purpose statement should be re-worded to state "how" OSV use would occur rather than "whether" OSV use would occur.	163
Concern ID: 23847	Commenters suggested re-wording the purpose statement to include preservation of specific park resources.	164
Concern ID: 23848	Commenters stated that the purpose statement should be within the legal bounds of the park.	165
Concern ID: 23849	One commenter suggested that the purpose statement broaden the use of the word "public" and maybe add a component dealing with "long-range."	166
Concern ID: 23850	One commenter suggested the purpose statement answer the question, "What do you (the public) want Yellowstone to look	166

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	like and be like in 50 years?"\	
<b><i>PN7075 - Purpose and Need: Comments on the Draft Need Statement</i></b>		
Concern ID: 23851	Commenters stated that the need statement should be revised to remove any limiting statements.	166
<b><i>PN8000 - Purpose And Need: Objectives In Taking Action</i></b>		
Concern ID: 23852	Health and Safety: Commenters questioned the use of the word "accident" in this objective statement, feeling that these cannot be "managed." Other commenters felt this objective should include the health of the communities around the park.	167
Concern ID: 23853	Coordination and Cooperation: Commenters suggesting adding a statement to this objective that would provide for a transition period once any plan is implemented. Another commenter asked for clarification on who "park" partners included and their role in this planning process.	167
Concern ID: 23854	Park Management and Operations: Commenters asked this statement to be modified to include "sustainability of road grooming."	168
Concern ID: 23855	Commenters stated that the objective to "Promote advances of OSV technology" may not be achievable due to the level of OSV use in the park and asked that BAT requirements be revisited.	169
Concern ID: 23856	Commenters felt that the objective to "Promote advances of OSV technology" was too narrow. They felt it was pre-decisional, indicating that OSV use would occur, and excluding wheeled vehicles.	169
Concern ID: 23857	Commenters requested that the objectives reflect the socioeconomic aspects of OSV management.	170
Concern ID: 23858	Visitor Use: Commenters suggested adding providing "affordable access to the public" to this objective.	171
	Commenters also raised concern about the component to "provide opportunities that are universally accessible" stating that this could be interpreted too broadly.	
Concern ID: 23859	Resources/Air Quality: Commenters stated that this objective should be clarified as it is un clear to see how air quality and aquatic systems relate.	172
Concern ID: 23860	Resources/Air Quality: Commenters asked that this statement be revised to seek the best air quality and minimize impacts to the greatest extent, rather than just meeting what is required under regulations.	173
Concern ID: 23861	Resources/Wilderness: Commenters stated that this objective should be removed, as it is not appropriate to expect wilderness character and values in developed areas.	173
Concern ID: 23862	Resources/Sound: Commenters suggested that the language of this objective be modified to include language on the "percent time audibility" or to provide information on loudness, frequency, and duration.	174
Concern ID: 23863	Resources/Wildlife: Commenters suggested this objective be modified to focus more on the geographic area where OSV use would occur, along travel corridors.	174



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Concern ID: 23864	Additional Objectives: Commenters suggested adding objectives, under resources, for solitude and light - as well as suggested wording for these objective statements.	175
Concern ID: 23865	Additional objectives: Commenters suggested adding employee safety and cost effectiveness to objectives. Another commenter suggested adding aquatic resources as an objective.	175
<b><i>PN9000 - Purpose And Need: Issues And Impact Topics Selected For Analyses</i></b>		
Concern ID: 23866	Commenters stated factors related to transportation that should be addressed in the plan/EIS including clarifying what roads are within the park, costs of various transportation management alternatives, and clarification on what is considered and OSV.	175
Concern ID: 23867	Commenters requested that the issues be looked at on an ecosystem level.	177
Concern ID: 23869	Commenters provided a list of resources they feel make Yellowstone unique and that should be addressed including: air quality, geothermal features, wildlife, geologic features, "wildness", water quality, quiet, and the range of visitor experience.	177
Concern ID: 23870	Commenters requested that new and emerging technologies be considered in the range of issues in the plan/EIS.	178
Concern ID: 23871	Commenters requested that the historic snowpack levels, and potential impacts of climate change on these levels, be addressed in the plan/EIS. Another commenter asked that the long-term costs of energy needs be addressed.	178
Concern ID: 23872	Commenters stated that wildness should not be an issue addressed in the plan/EIS as this is not a resource along road corridors and developed areas.	180
Concern ID: 23873	Commenters requested that the issue of Emergency Medical Services (EMS) be addressed in the plan/EIS.	180
<b><i>PO2000 - Park Operations: Methodology And Assumptions</i></b>		
Concern ID: 23906	Commenters requested that the plan/EIS analyze the manpower and human resourced that would be dedicated to carrying out each alternative (personnel, equipment, facilities, concessionaire services, and IT).	181
Concern ID: 23907	Commenters asked that the plan/EIS analyze the costs associated with an alternative that plows roads, and requested a cost analysis between plowing and grooming of the roads.	181
Concern ID: 23908	One commenter noted the high costs of transporting goods and services oversnow into the park.	182
Concern ID: 23910	One commenter requested that the plan/EIS address NPSs responsibility to groom trails for non-motorized uses.	182
<b><i>SE2000 - Socioeconomics: Methodology And Assumptions</i></b>		
Concern ID: 23911	Commenters requested that the plan/EIS analysis consider the impacts of the economy of surrounding communities.	182

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Concern ID: 23912	Commenters stated that the NPS was not charged with ensuring the economy of the surrounding communities, and that they did not believe the adverse impacts of a reduction in OSV use would be large.	184
<b><i>SE3000 - Socioeconomics: Study Area</i></b>		
Concern ID: 23874	One commenter requested that Big Sky be included in the study area for the socioeconomic analysis.	186
<b><i>SE4000 - Socioeconomics: Impact Of Proposal And Alternatives</i></b>		
Concern ID: 23875	Commenters stated that if the park is closed to winter use, the local economy would be adversely impacted.	186
Concern ID: 23876	One commenter requested that the socioeconomic impact analysis not only look at loss of revenue from OSV use, but the potential economic values of not permitting OSV in the park.	187
<b><i>SS2000 - Soundscapes: Methodology And Assumptions</i></b>		
Concern ID: 23877	Commenters requested that the plan/EIS analysis include noise pollution, with some commenters noting the regulatory authority in which NPS must consider impacts to soundscapes.	188
Concern ID: 23878	Commenters stated concerns with noise generated from snowcoaches they felt should be addressed in the plan/EIS. This included conducting more monitoring of snowcoach noise, explaining why snowcoaches are preferred if they are louder than snowmobiles, as well as providing possible data the NPS could use to analyze the sound impacts from snowcoaches.	189
Concern ID: 23880	Commenters suggested noise modeling techniques and data that should be included in the plan/EIS. Suggestions included using impact definitions that do not have a park-wide metric, looking at both sound quality as well as sound pressure, consideration of previous planning efforts sound thresholds, and correlation of EPA standards and NPS monitoring protocols.	190
<b><i>SS4000 - Soundscapes: Impact of Proposal And Alternatives</i></b>		
Concern ID: 23881	Based on the analysis from past planning efforts, commenters stated that snowmobiles should be removed from the park to lessen the impact to the soundscape.	192
<b><i>VA1000 - Visitor Use and Experience: Guiding Policies, Regs And Laws</i></b>		
Concern ID: 23882	Commenters noted sections of the NPS 2006 Management Policies, Executive Orders, and the Organic Act that the NPS should consider during the analysis of impacts to visitor use and experience.	192
<b><i>VA2000 - Visitor Use and Experience: Methodology And Assumptions</i></b>		
Concern ID: 23883	Commenters requested that the analysis of visitor use and experience address recreational opportunities on nearby or adjacent federal lands.	194
Concern ID: 23884	Some commenters noted that they felt the cost for visiting Yellowstone in the winter was prohibitive, and would like to see that addressed in the plan/EIS analysis.	195
Concern ID: 23885	Commenters asked that the guided requirement be evaluated, with some noting they felt the requirement for a guide impacted the visitor experience by bunching large groups together that create more noise and by taking away visitor flexibility.	195

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	One commenter noted the potential benefits of a guide, and if more vehicles were allowed, would like to see an analysis of requiring professional drivers.	
Concern ID: 23887	Commenters requested that specific trend data/metrics be addressed in the plan/EIS including: - an analysis of the geographic origin of park visitors - an analysis of OSV numbers that includes guides in the count - trends data on snowmobile use by snowshoers/skiers - inclusion of trends that show snowcoach use increasing and snowmobile use decreasing - inclusion of monitoring reports that show how many visitors pass through certain park areas	196
Concern ID: 23888	Commenters provided suggestions for how visitor use should be modeled in the plan/EIS. Specifically, it was requested that a visitation curve be used, instead of assuming 100% use on every day of the winter use season.	198
Concern ID: 23889	One commenter requested that the NPS consider statistics showing that a snowcoach only option is not viable for park visitors, with others requesting that the visitor use and experience analysis include a wider range of options for visitors.	199
Concern ID: 23890	Commenters requested that the analysis of visitor use and experience take into consideration the uncertainty of past winter use management, and how that may have impacted past and future OSV use numbers.	200
Concern ID: 23891	Commenters requested that the plan/EIS consider a carrying capacity for winter use.	201
<b><i>VA4000 - Visitor Use and Experience: Impact of Proposal And Alternatives</i></b>		
Concern ID: 23892	Commenters noted that the plan/EIS should consider access for those visitors with disabilities, and the role OSV play in this access.	201
Concern ID: 23893	Commenters noted that they believe OSV use would impact the park's flora, fauna, water resources, and air quality and that reduction in OSV use would limit these impacts and increase the visitor experience.	202
Concern ID: 23895	Commenters noted that past planning efforts have resulted in an decrease of park visitation, with some feeling that no snowmobile use would cut off visitation from the park in the winter.	203
Concern ID: 23897	One commenter suggested that visitor use could be increased through programs that allot money to certain groups so they can visit the park.	203
<b><i>WH1000 - Wildlife And Wildlife Habitat: Guiding Policies, Regs And Laws</i></b>		
Concern ID: 23898	Commenters noted what they believed what NPS responsibility to protect wildlife under the Organic Act, Executive Orders, and NPS Management Policies.	203
<b><i>WH2000 - Wildlife And Wildlife Habitat: Methodology And Assumptions</i></b>		
Concern ID: 23899	Commenters stated that non-motorized uses could have a greater impact than snowmobiles, and felt this should be considered in the plan/EIS.	204
Concern ID: 23900	Commenters stated that the plan/EIS should consider and use data showing that OSV use does not disturb wildlife in the	205

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	park.	
Concern ID: 23902	Commenters requested that the plan/EIS evaluate the impacts of snowpacking/road grooming on the park's wildlife. It was stated that this was a deficiency of past planning efforts and data to be considered for this effort was suggested.	206
Concern ID: 23903	Commenters suggested specific areas they would like to see analyzed in the plan/EIS including: - no assumptions that habituation equals no disturbance - is there a tipping point for disturbance - how does vehicle use influence animal movement/avoidance	208
<b><i>WH4000 - Wildlife And Wildlife Habitat: Impact Of Proposal And Alternatives</i></b>		
Concern ID: 23901	The Wyoming Game and Fish Department noted that they did not feel there were terrestrial or aquatic concerns related to the Winter Use Plan.	209
Concern ID: 23905	Commenters noted that current winter use would impact wildlife less than unrestricted wheeled vehicle use.	209