



American Recreation Coalition

*Dedicated to the protection and enhancement of everyone's right
to health and happiness through recreation.*

September 17, 2004

Yellowstone National Park
Temporary Winter Use EA Public Comments
P. O. Box 168
Yellowstone National Park, WY 82190

Dear Planning Team:

The American Recreation Coalition is pleased to submit comments on the Temporary Winter Use Plans Environmental Assessment for Grand Teton and Yellowstone National Parks and the John D. Rockefeller, Jr., Memorial Parkway. The use of snowmobiles in these areas is an important issue that affects millions of people – American and international visitors alike – who want to be able to experience these magnificent sites during the winter by using snowmobiles as their mode of transportation. We offer our comments as an organization comprised of more than one hundred organizations representing diverse components of the \$400 billion per annum recreation industry and millions of recreation enthusiasts.

We welcome the National Park Service's effort to develop this winter use plan and thus eliminate uncertainty regarding the use of snowmobiles in these special areas in the 2004-2005 and future winter seasons. Nearby communities whose economic vitality in the winter has been inextricably linked to snowmobile access to these areas, especially to Yellowstone, for close to 30 years have been harmed by the confusion that has surrounded this issue in recent years.

We are pleased to be able to support, in general, Alternative 4, the preferred alternative management plan. We believe that it honors the National Park Service's longstanding policy that snowmobiles are a legitimate means of transportation allowing their riders to see, sense and enjoy the national parks in unique and memorable ways.

We understand and support the need for daily entry limits for snowmobiles to the parks and accept the limits of 720 snowmobiles per day for Yellowstone and 140 per day for Grand Teton and the Parkway in this temporary management plan. However, we believe that the number for Yellowstone could and should be boosted to 950 over the next three years as this temporary plan is implemented and as the long-term management plan is completed. That higher limit, which represents a significant reduction from the number of

snowmobiles allowed into the park in previous years, was deemed to be environmentally acceptable in the final Supplemental Environmental Impact Statement (SEIS) published last year.

Years of research and development have led to the snowmobile industry's recent production of quiet, low-emission snowmobiles. We think that it is appropriate to require that only snowmobiles equipped with this best available technology (BAT), as outlined in the SEIS, be allowed to enter Yellowstone. However, we would like to recommend that snowmobiles exempt from BAT requirements be allowed to use the Grassy Lake Road and the Continental Divide Snowmobile Trail since they would be essentially traveling on roadway shoulders. These trails are groomed – at considerable expense – but underutilized.

We are understanding but not fully supportive of the requirement allowing only commercial snowmobile guides to bring groups of snowmobilers into Yellowstone. We think that special training should be made available that would allow non-commercial guides, who have been certified as successfully completing such training, to bring in as many as 20% of the daily entries. We recognize that such a certification process cannot be put in place before the coming winter, but we recommend that an effort be made to implement such a program under both the temporary and long-term management plans. We also support allowing access to the Fire Hole Canyon Drive in the afternoons, but request that consideration be given to all-day access. Finally, we support provisions in the alternative allowing anglers to use snowmobiles to access Jackson Lake for ice fishing.

In closing, we would like to quote a portion of the National Park Service's management policies in support of the Preferred Alternative: "To provide for enjoyment of the parks, the National Park Service will encourage visitor activities that. . . will foster an understanding of, and appreciation for, park resources and values, or will promote enjoyment through a direct association with, interaction with, or relation to park resources." This policy describes precisely the reasons for allowing snowmobiling in Yellowstone and Grand Teton National Parks and on the John D. Rockefeller, Jr., Memorial Parkway. Snowmobile access fosters understanding, appreciation, and enjoyment of the wonderful resources of these parks and, thus, is an appropriate and valuable use of these parks.

Thank you for your careful consideration of these comments.

Sincerely,

Derrick A. Crandall

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President