

March 29, 2010

Jackson Hole Conservation Alliance
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Yellowstone National Park
Winter Use Scoping Comments
P.O. Box 168
Yellowstone NP, WY 82190

The Jackson Hole Conservation Alliance, representing our 2,000-plus members, continues our history of participation in the development of a winter use plan for Yellowstone National Park. We have pushed for a plan that relies upon the best available science to determine the critical policy decisions in this management tool. Please accept our comments for consideration on this ongoing issue.

Yellowstone National Park (YNP) is a unique and spectacular destination for visitors from around the world. While accommodating these visitors is one of the responsibilities of YNP, the greatest and least flexible component to be addressed in a management plan is wildlife and its habitat. The Conservation Alliance strongly supports the gradual phase out of snowmobiles in the park. This decrease in motorized access during winter will help wildlife successfully survive the rigorous winters.

To ensure that wildlife is protected, an environmental impact statement should include thorough review of the following:

- Is there a level of visitor access in winter that is a “tipping point” for wildlife? Is there a maximum number of people on the landscape that is detrimental to wildlife in this stressful period of the year?
- Look at the presence of motorized vehicles (snowmobiles and snow coaches) on air quality, animal movement, and animal dislocation and avoidance. The number of motorized vehicles should be kept at a minimum or phased out.
- Recent research correlates noise to impacts on wildlife fertility, reproductive success and other factors. This should be looked at in great detail as noise continues to be a significant impact.

- The use of snow coaches instead of snowmobiles should generate a look at requirements for snow coaches to adhere to greater noise and air quality standards.
- The lack of complete combustion of fuels by snowmobiles results in both surface and air deposition. The impact on ground water and surface water systems should be examined.
- No plan is infallible and providing for an adaptive management program should be included. This program should be clear, effective and enforceable.
- Recent requests to plow the road from West Yellowstone to Old Faithful should be carefully analyzed. Plowing this road would have a greater impact on wildlife than the current over-snow use. The movement of animals would either be enhanced and animals would move along the road or they would be impeded in their attempts to get across the road. Neither is acceptable for the survival of wildlife.

The resources of YNP cannot be replicated or found elsewhere, employee health is not a bargaining chip, and the wildlife found here should not be sacrificed for the recreational benefits of the public. The Conservation Alliance believes that YNP, one of the country's greatest treasures, deserves policy determined by the most rigorous science and not marketing reports.

Thank you for including our comments in your scoping process. We look forward to reviewing the draft Environmental Impact Statement.

Sincerely,

Louise Lasley
Public Lands Director
Jackson Hole Conservation Alliance