

YELLOWSTONE BUSINESS PARTNERSHIP SCOPING COMMENTS TO NATIONAL PARK SERVICE ON YELLOWSTONE WINTER USE EIS

Since its inception the Yellowstone Business Partnership (YBP) has been working to advance sustainable enterprise throughout the Greater Yellowstone region. Specifically YBP members want to enhance the economic well-being of our major cities and gateway communities, and improve year-round mobility for their residents and guests – all while preserving the unique natural resources we enjoy in this region.

In 2007, YBP published *Turning On the Off-Season*, which illustrates the extremes in economic activity in Yellowstone gateway communities and the difficulty they face in maintaining vital, year-round services. Concern with the well-being of gateway communities was again expressed in 2008 when more than 120 regional stakeholders were involved in the process of developing a *Concept of Operations Plan* for a regional transportation system in the Yellowstone-Teton region. These studies clearly showed that the social, economic and environmental health of our Greater Yellowstone communities is related to the nature and cost of Park access, and the Park's seasonal operating calendar, both of which deserve a re-evaluation in this Winter Use EIS.

Interestingly, the winter use situation has now changed given the bright prospects for a year-round public transportation system that will eventually serve all five Yellowstone gateways. **Linx is a new member cooperative that links existing transportation providers across 27 counties in Idaho, Montana and Wyoming, and markets their services through one integrated system.** Linx was incorporated in January 2010 following the guidance of more than 50 volunteers representing business, agencies and nonprofit organizations, and one of its goals is to improve transportation services to and through Yellowstone and Grand Teton national parks.

Given the existence of Linx, YBP suggests that the Park Service evaluate a Plow/Bus Alternative in the Winter Use EIS to facilitate more affordable, year-round public access within Yellowstone National Park. From approximately November 1 through late April, the Park would be primarily accessed by fixed-route shuttle and interpretive tour buses that would operate by permit on plowed, low-elevation roads. With buses available to all winter guests, non-permitted private vehicles could be excluded from all plowed roads in winter, including the road from Mammoth through the Lamar Valley, as a human and wildlife safety precaution.

We believe that such an “All-Season” operating scenario for Yellowstone National Park would provide the greatest number of social, economic and environmental benefits for visitors while protecting wildlife and wildlife habitat. Elements of this scenario are detailed below for further Park consideration and analysis:

- First, a Montana -Wyoming agreement would be needed to plow Colter (Cooke) Pass to allow for year-round access from the east over the Chief Joseph Highway (which is open year-round). If needed, an elevated snowmobile trail could be created on one shoulder and a truck/trailer parking provided at Pilot Creek to accommodate the existing snowmobile activity along this section of Highway 212.
- Bus service would be offered year-round on the plowed, lowest elevation Park roads, connecting Cooke City west to Mammoth/Gardiner, south to Old Faithful, and west to West Yellowstone. In the winter a fixed number of quiet, mid-size buses would be permitted for guided wildlife tours and cross-park shuttles that would serve each plowed park entrance (Northeast, North and West). If the shuttles were part of Linx, advance reservations and electronic ticketing would be an automatic system service.

- The current policy that allows private vehicles on the road between Mammoth and the Northeast Entrance would need to be reconsidered. With access from the east possible under this all-season scenario, only legal residents of Silver Gate and Cooke City would need vehicular passes to travel through the Lamar Valley in winter. Snowmobilers would have several options: access Cooke City and the national forest trails from the east; ride the bus/sled shuttle service that could be provided through the park from the west; or rent snowmobiles in Cooke City upon arrival by bus from either direction.
- Attractive educational and recreational day trips could be offered from Norris to the Canyon area using oversnow transportation. An economic and environmental evaluation would be needed in the EIS to assess use of the Norris parking lot as a bus transfer point and staging area for commercial snowcoaches and snowmobiles. Expansion of yurt or other appropriate lodging could also be considered for Canyon.
- Continued grooming of the snow-road from Flagg Ranch north to Canyon (and over to Old Faithful) should be evaluated to serve a variety of north-south transport needs such as:
 - Snowcoach service from Flagg Ranch to Norris (and reverse) to access lodging destinations in Yellowstone. This route could include a rest stop and sightseeing option at Canyon.
 - Guided snowmobile trips from Norris-Canyon-Flagg Ranch (and in the reverse direction)
 - Drop-offs of backcountry skiers to access a hut-to-hut ski system that could be established, for example, from West Thumb to Old Faithful. Such a system would offer challenge and solitude not easily found in the Park today, and it would be enhanced if Craig Pass was closed to all oversnow vehicles.
- The highest Park passes near Canyon and Lake (Dunraven, Sylvan) would neither be plowed nor maintained for public oversnow travel. The EIS should indicate whether an earlier opening of those passes for bus and/or auto traffic would be feasible if neither is packed down by regular grooming.
- Concessioner contracts would need to be modified to provide for year-round operation of Mammoth and Snow Lodge visitor facilities and needed support facilities at Norris and Canyon.
- Bicycling opportunities could be accommodated in the late fall and early spring as soon as the snow melts. Buses could carry bikes or pull bike trailers during this period to permit extended pedaling seasons in designated areas after November 1st and before cars are allowed in late April.

In summary, the principles advanced under this suggested All-Season scenario are:

- 1) Up to three major Park entrances would be plowed and essential services available 12 months/year
- 2) Year-round connectivity would be maintained to four of five entrances to advance the well-being of gateway communities and the efficiency of Park/concessioner administration.
- 3) A variety of recreational and transportation alternatives would be offered within environmental constraints.
- 4) Hybrid or alternative fuel buses could be selected for all-season travel as they would be best for air quality, sound levels, carbon reduction, human safety, and minimizing human-wildlife conflicts.
- 5) The highest elevations would be preserved for winter wildlife security and to maintain their backcountry character.