



Frozen Lake Surface Access and Use Plan

Voyageurs National Park

Civic Engagement Comment Summary Report

August 2023

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Appendix A: All Correspondence Received

Introduction

On March 28, 2023, the National Park Service (NPS) initiated a 37-day civic engagement period for the proposed Frozen Lake Surface Access and Use Plan in Voyageurs National Park (the park), Minnesota. In response to public feedback, the NPS extended the civic engagement period by one month for a total of 68 days, ending on June 3, 2023. As part of the civic engagement process, the NPS solicited input on the preliminary proposed action, preliminary purpose and need, and potential resource considerations. Comments from the civic engagement period will be used to inform the development of the preliminary range of alternatives and resource considerations.

A newsletter with information about the proposed project was made available through a press release on March 28, 2023. The public was encouraged to submit comments through the NPS's Planning, Environment, and Public Comment (PEPC) website (<https://parkplanning.nps.gov/VOYA-frozen>). Comments were also accepted by US mail and at the in-person public meetings described below. One hundred and eight-two pieces of correspondence were received during the comment period, including one form letter submitted by 42 individuals.

Public Outreach During the Comment Period

The NPS issued a press release to local media outlets on March 28, 2023, announcing the start of the civic engagement period. The NPS also sent the press release and electronic newsletter to interested individuals and organizations, including offices of elected officials, notifying them of the opportunity to comment and that the NPS PEPC website (<https://parkplanning.nps.gov/VOYA-frozen>) was available for the public to submit comments. The newsletter, including information about the background, purpose and need of the project, the park's preliminary proposal, potential resource considerations, and information on how to comment, was also available on the PEPC website.

Two in-person open house meetings and one virtual public meeting were held during the civic engagement period. Meeting details and numbers of attendees are provided below. The meetings included an introduction by Superintendent DeGross, a PowerPoint presentation with an overview of the project, and a question-and-answer session. Attendees were encouraged to make formal comments through the NPS PEPC website. Printed copies of the newsletter were made available to attendees of the open house meetings as well as a comment form that could be completed and handed to NPS staff or submitted by mail. Following the presentation and question-and-answer session at the open house meetings, attendees were invited to view informative banners placed at stations around the room and NPS staff were available to speak with meeting attendees and answer questions. After the meetings, the meeting PowerPoint presentation was made available the public via the PEPC website.

Date	Time	Location	Attendees
April 18, 2023	5:00 p.m.–7:00 p.m.	Kabetogama Community Building 9707 Gamma Road Kabetogama, Minnesota 56669	111
April 19, 2023	5:00 p.m.–7:00 p.m.	Virtual Meeting	55 (unique viewers)
April 20, 2023	5:30 p.m.–7:30 p.m.	Auditorium at Rainy River Campus of Minnesota North College 1501 Highway 71 International Falls, Minnesota 56649	58

Definition of Terms

Primary terms used in the document are defined below.

Correspondence: A correspondence is the entire document received from commenters and includes letters, written comment forms, comments entered directly into PEPC, and any other written comments received via US mail or provided in person at the park.

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 for an alternative, additional data regarding the existing condition, or suggestions for resource topics to be considered.

Code: A code is a grouping centered on a common subject. The codes were developed during the comment analysis process and are used to track major issues.

Concern: Concerns are statements that summarize the comments under each code. Some codes require multiple concern statements, while others do not.

Comment Analysis Methodology

Correspondence was received by hard copy letter via US mail, email, or correspondence entered directly into the PEPC system. Sixty-four letters received in-person at public meetings or via email were entered into the PEPC system for analysis. Hardcopies included 42 copies of one form letter.

Once all correspondence was entered into PEPC, each was read, and specific comments within each unique correspondence were identified. When identifying comments, every attempt was made to capture the full breadth of comments submitted.

To categorize comments, each comment was given a code to identify its general content and to group similar comments. Twenty codes were used to categorize the public comments received. An example of a code developed for this project is *AL1000 – New Alternatives or Elements*. In some cases, the same comment may be categorized under more than one code, reflecting the fact that the comment may contain more than one issue or idea. Once every correspondence was broken into comments, all comments were categorized into concern statements or summarized with similar comments.

Concern Report

This report summarizes the comments received during the public comment period. Table 1 provides a list of organizations that submitted correspondence and the corresponding correspondence ID. Table 2 lists the codes used to categorize comments and the number of comments per code. Tables 3 through 22 provide concise lists of concern statements by code.

Table 1. List of Organizations that submitted Correspondence

Organization	Correspondence ID
National Parks Conservation Association	116
Voyageurs Conservancy	121
Howling For Wolves	93
All-Terrain Vehicle Association of Minnesota	136
Voyageur Trail Society, Inc	139
Minnesota Department of Natural Resources	124
Town of Crane Lake	37
Kabetogama Township	81
Littlefork City Council	133
International Falls, Ranier, & Rainy Lake Convention and Visitors Bureau	110
Crane Lake Visitor and Tourism Bureau	137
Kabetogama Lake Association	74
Crane Lake Lodge	3
Island View Lodge	5
Duncaonald, LLC	9
ODAAT Investments, LLC	10
Voyageur Country ATV	24
Workrise	32
Voyageur Park Lodge Reef Runner Rentals LLC	73
Rocky Ledge	134

Table 2. Number of Comments Per Code

Code	Number of Comments
EL1000 – Elements: ORV Use	44
EL2000 – Elements: Proposed Zoning	18
EL3000 – Elements: Mukooda Truck Portage	3
EL4000 – Elements: Ice Roads – Use and Location	38
EL5000 – Elements: Fees and Permits	26
EL6000 – Elements: Ice Shelters	21
IS1000 – Issues: Natural Resources	34
IS2000 – Issues: Cultural Resources	5
IS3000 – Issues: Socioeconomics	66
IS4000 – Issues: Private Landowner Access	21
IS5000 – Issues: Visitor Experience	60
IS6000 – Issues: Enforcement and Staffing	4
IS8000 – Issues: Accessibility	35
AL1000 – New Alternatives or Elements	32
PN1000 – Purpose and Need	27
CC1000 – Consultation and Coordination	7
PI1000 – Public Involvement	21
ON1000 – Other Data Needs	4
FR1000 – Federal Regulations – ORV Use on NPS Lands	24
SR1000 – Minnesota State Regulations	45

Table 3. EL1000 – Elements: ORV Use

Concern Statement 1: Commenters supported the continued use of off-road vehicles (ORVs) on frozen lakes in the park without further restriction or regulation. Commenters indicated that restrictions on ORV use would negatively affect the public's right to access the park. One commenter noted that snowmobiles may not be viable for providing access without adequate snow depths.

Correspondence Id: 37 **Comment Id:** 1183498

Comment Text: The Town of Crane Lake strongly supports the use of all ice surfaces for off road vehicles (ORVs) including street legal vehicles, all-terrain vehicles (ATVs) utility task vehicles (UTVs), and other types of non-snowmobile vehicles; as well as, snowmobiles on VNP Lakes.

Correspondence Id: 58 **Comment Id:** 1183803

Comment Text: I do not think that ORV use on Lake Kabetogema is a problem and by prohibiting ORV use, you are severely negatively impacting the publics right to access the park as intended.

Correspondence Id: 81 **Comment Id:** 1183615

Comment Text: It is the Kabetogama Township Board position that all should be free to travel anywhere on all lake surfaces. UTV's are used for warmth and comfort for many individuals while traveling on the ice. UTV's are used for transporting fish houses, and trucks are the only vehicle that can transport larger fishing shelters. ATV and UTV's are used as a safe mode of travel on the ice surface. As the Winter days change, A TV and UTV travel may be the only way to continue to safely travel in the park. There are many residents, vacationers, etc., to whom access would be limited if the mode of transportation is curtailed by changes to the frozen lake surfaces access that currently exists.

Correspondence Id: 105 **Comment Id:** 1183835

Comment Text: There should be no restrictions as to what vehicles can access the ice surface. Period!!!

Correspondence Id: 127 **Comment Id:** 1183999

Comment Text: Also, in the last 50 years, the use of ATV's, UTV's, OHV's, cars, pickups, fish houses, etc. have not been an issue and I do not believe any regulations are needed to govern this type of use on the lake.

Correspondence Id: 130 **Comment Id:** 1184015

Comment Text: When the park was established there were no atvs or utvs. If so, they would have been included. You are limiting access when you should expand it.

Correspondence Id: 34 **Comment Id:** 1183446

Comment Text: The general mode of transportation is by snowmobile however if the conditions allow Truck, 4-wheeler, or side by side are all options that I would like to remain available for the entire Lake. There has been a few years where there wasn't much for snow on the lake. A snowmobile would not work as it would melt the hy-fax and overheat the motor.

Concern Statement 2: Commenters indicated that ORVs in the park should be regulated in the same manner as snowmobiles.

Correspondence Id: 50 **Comment Id:** 1183530

Comment Text: Regarding frozen water access for ice fishing or other travel in Voyageurs National Park. I do not own a snowmobile, but instead chose to operate an ATV with tracks for winter use. There is absolutely no difference except semantics in the use of a snowmobile and a tracked ATV or UTV across a frozen lake. This also holds true with the use of a tracked SUVs. Please DO NOT outlaw the use of ATVs and UTVs on the frozen park lakes. There is absolutely no reason to do so

Correspondence Id: 89 **Comment Id:** 1183640

Comment Text: ORV use in the park. I haven't seen a problem and think that the park should allow them on the lakes and designated trails like the snowmobiles. When the park was formed ORV's were not around to be included in the regulations. If the park was formed today, they would be included from what I have seen at the first public meeting.

Correspondence Id: 67 **Comment Id:** 1183585

Comment Text: For many folks, there is a preference for purchasing ATV's instead of snowmobiles. Many ATV's are able to be used 10 to 12 months rather than a typical 10 to 12 weeks snow mobile season.

Correspondence Id: 106 **Comment Id:** 1184070

Comment Text: Snowmobiles cause just as much of a disturbance as other vehicles do on a frozen lake surface. There's no good reason to ban these types of vehicles.

Correspondence Id: 108 **Comment Id:** 1183865

Comment Text: The use of cars, trucks, tracked vehicles, AVTs, OHVs, UTVs and other vehicles should be allowed to be used on the lakes and land just as the snowmobiles are allowed to be used throughout the park, with limitations concerning wildlife protection. The lakes do not have the concerns of wildlife protection and these vehicles should be allowed.

Correspondence Id: 120 **Comment Id:** 1183951

Comment Text: Whether you have a tracked vehicle vs a wheeled vehicle should make a difference? You can't drive to your fish house... or maybe even HAVE a fish house?

Correspondence Id: 136 **Comment Id:** 1185027

Comment Text: During winters of low snow, ATVs are the best means to get around on the frozen lakes for fishing. Even during years of normal snowfall, ATVs, especially those with tracks, are a safe and environmentally friendly means to access the lakes within Voyageurs National Park, similar to snowmobiles.

Correspondence Id: 25 **Comment Id:** 1183749

Comment Text: We would encourage the park to allow ATV/UTVs (Class 1 & 2, including Class 2 with tracks which cause the ATV/UTV to exceed 65" width) ice-only access within the park in a manner similar to snowmobiles. The park could designate ATV/UTV trail routes - or corridors along the wide snowmobile trails on the lakes, etc.

Correspondence Id: 33 **Comment Id:** 1183443

Comment Text: To put further restrictions on the use of ORV's is uncalled for. UTV's and ATV's when driving on a lake are low impact, same as snowmobiles.

Correspondence Id: 136 **Comment Id:** 1185029

Comment Text: Policies for winter ATV use in the Voyageurs National Park should be similar to those of snowmobile travel on the frozen lakes. Actual travel will naturally be limited by snow depth.

Correspondence Id: 33 **Comment Id:** 1183444

Comment Text: on Lake Kabetogama, 95% of the traffic is snowmobiles in winter. ORV's have no impact. I don't know why your now singling out a choice of recreation for people visiting our beautiful country.

Concern Statement 3: Commenters indicated that ORVs or large ice shelters should be prohibited in the park.

Correspondence Id: 51 **Comment Id:** 1183535

Comment Text: I have watched the north woods turn into a racetrack of size by sides. Many having loud mufflers and driving recklessly. Let's keep them out of the park and leave as is. I believe the lakes get enough fishing pressure in the open water.

Correspondence Id: 97 **Comment Id:** 1183742

Comment Text: Voyageurs is unique in its development of ice roads and snowmobiles are allowed by legislation establishing the park, however I believe ORVs and large ice shelters are incompatible with the mission of Voyageurs National Park.

Concern Statement 4: Commenters noted that NPS and park regulations should be updated to account for newer technologies and trends, including ORVs for travel on frozen lake surfaces, to better manage use of the park into the future.

Correspondence Id: 88 **Comment Id:** 1184038

Comment Text: The proposed FLP does bring VNP into compliance with current CFRs but it fails to address the long term uses of the frozen lake surfaces of Voyageurs National Park and falls short on the evolution of winter conveyance vehicles and the implications this has.

Correspondence Id: 90 **Comment Id:** 1184044

Comment Text: If electric bikes, which are a relatively new technology, have been addressed, then the past precedent of ATV's, UTV's, cars, trucks, etc., which have been in use on the frozen water surface for 40 + years, and do not have documented proof of any safety or resource protection concerns are certainly a viable option within VNP. These transportation options support a healthy park experience that is accessible, desirable, and relatable to people of all abilities, and can increase human visitation through the expansion of active transportation options in parks.

Correspondence Id: 86 **Comment Id:** 1183631

Comment Text: Does VNP update their equipment? Tools? Technology? Do they stay on top of current trends? ATV/UTV's are the new equipment and new technology of current day. ATV/UTV out sell snowmobiles in recent years by far. VNP needs to embrace this future and work with the people to keep ATV/UTV's accessible and not look at them as a threat to the frozen lakes of VNP.

Correspondence Id: 86 **Comment Id:** 1183636

Comment Text: Suggestion: Change the law and allow ATV/UTV tracked vehicles on frozen lake surfaces. This would mean a lot less pain and suffering for all parties involved. We know the facts regarding ATV/UTV with tracks - they leave less snow tracks, have less emissions and are safer than a snowmobile.

Correspondence Id: 109 **Comment Id:** 1183874

Comment Text: The UTV which is gaining more users yearly, is, as I see it, a very safe means of transportation. It isn't fast, but it, as some models do, has a heated cab. As an older man, I see it as way to get out to enjoy the winter months for more years to come as I have trouble keeping my fingers and toes warm.

Concern Statement 5: Commenters stated that certain types of ORVs should be allowed on frozen lakes in the park with appropriate regulations and within defined boundaries.

Correspondence Id: 25 **Comment Id:** 1183783

Comment Text: Is there a need to explain/define where ORVs can go within the park? Yes.

Correspondence Id: 111 **Comment Id:** 1183886

Comment Text: Allowing but regulating ATV/UTVs and permanent ice fishing houses makes sense.

Correspondence Id: 25 **Comment Id:** 1182704

Comment Text: We think limiting true ORVs (Jeeps, etc.) to ice roads makes sense.

Correspondence Id: 35 **Comment Id:** 1183451

Comment Text: I do not agree on limiting side by sides, fourwheelers, or other off road vehicles to that. Maybe we could work on getting a regulation put in place to legalize them on the hard surface and already made portages. That would increase access to the park as with the higher cost of equipment these days alot of people do not have both snowmobiles and off road vehicle. usually its one or the other.

Correspondence Id: 44 **Comment Id:** 1183524

Comment Text: UTVs with tracks are very common to fish with and the impact is no different than a snowmobile. Don't allow them on trail systems, portages, etc but they could be used anywhere else.

Correspondence Id: 85 **Comment Id:** 1183624

Comment Text: Total access to the park by motor vehicles for ice fishing pre-dates the creation of the park therefore is part of the area's history. However, new developments of ATVs, UTVs, OHVs, wheelhouses, etc never ends therefore size/weight restrictions could be in order.

Correspondence Id: 86 **Comment Id:** 1183635

Comment Text: Wheeled vehicles are a problem and do leave deep tracks on the lake that can be hazardous to snowmobilers. **Suggestion: Limit any vehicle with wheels - meaning with round tires ex: trucks, wheeled fish houses, ATV's or other modes of transportation with wheels - must stay on plowed ice roads only.

Correspondence Id: 95 **Comment Id:** 1183646

Comment Text: Snowmobiles and small 4 wheeler/atvs should be allowed on ice surfaces, side by sides or large ohvs should not be.

Correspondence Id: 72 **Comment Id:** 1183604

Comment Text: If there is concern about the evolution of ATVs and icehouses, there are ways to address those problems without a total ban.

Concern Statement 6: One commenter indicated that off-highway motorcycles (OHMs) should be prohibited on frozen lakes in the park.

Correspondence Id: 25 **Comment Id:** 1182705

Comment Text: we could support not allowing OHMs for use on the ice at all (like the way jet ski personal watercraft are not allowed in summer).

Concern Statement 7: Commenters suggested that the definition of ORV in the park's preliminary proposal should be refined to better differentiate between different types of ORVs.

Correspondence Id: 25 **Comment Id:** 1182700

Comment Text: We think the proposal is too broad regarding ORVs. Minnesota differentiates between ATVs (Class 1 & 2), off-highway motorcycles (OHMs) and larger off-road vehicles. We encourage the park to follow these guidelines in your proposal, as it better coordinates for ORV users of state trails and areas.

Correspondence Id: 8 **Comment Id:** 1182047

Comment Text: ATVs and UTVs should not be grouped in the same category as cars/trucks (ORVs). ATVs and UTVs are used in the same way as snowmobiles to access off-ice-road ice fishing opportunities (especially when tracks are used instead of wheels)

Correspondence Id: 116 **Comment Id:** 1183923

Comment Text: Any and all alternatives should also address for clarity the distinction between the use of ORVs, snowmobiles, and street legal vehicles in accordance with the Park Service Management Plans.

Concern Statement 8: One commenter stated that the plan should be expanded to consider ORV use in the park beyond frozen lake surfaces.

Correspondence Id: 121 **Comment Id:** 1183967

Comment Text: NPS needs to establish clear rules as ATV trail segments are developed in close proximity to park boundaries. While this plan is specific to frozen lake surfaces in winter, the park should also evaluate how the plan potentially informs the park's approach to ATV/UTV use on land-based park roads across seasons and be clear about those potential implications as part of ongoing public engagement efforts.

Concern Statement 9: Commenters indicated that some types of ORVs have less of an impact on park resources than snowmobiles.

Correspondence Id: 8 **Comment Id:** 1182048

Comment Text: In many cases, I would consider snowmobiles to be more intrusive on the natural beauty of the park (louder, faster). To limit the use of ATVs and UTVs would be unfair to those who use them to enjoy the park.

Correspondence Id: 108 **Comment Id:** 1183862

Comment Text: The use of the snowmobile is not any different than the use of the wheeled/tracked vehicles. In fact snowmobiles can go where the other vehicles can not, that could actually cause damage to the wildlife in the area

Correspondence Id: 108 **Comment Id:** 1183869

Comment Text: Unless the Park Service can prove that these vehicles really damage the lake, they should be allowed with a plan developed by the Committee listed above that considers the uniqueness of the VNP.

Concern Statement 10: One commenter noted that docks would not be able to be serviced if wheeled vehicles were not allowed on frozen lake surfaces in the park.

Correspondence Id: 118 **Comment Id:** 1183937

Comment Text: Unintended consequences to consider with the banning of wheeled vehicles on the lakes :
*Docks unserviceable - how do you service or maintain shore lined docks without the use of power equipment - ATV, tractors, skid steers, trucks, excavators and other power equipment.

Concern Statement 11: One commenter suggested that state law enforcement would not be able to effectively carry out its duties if wheeled vehicles were not allowed on frozen lake surfaces in the park.

Correspondence Id: 118 **Comment Id:** 1183938

Comment Text: Unintended consequences to consider with the banning of wheeled vehicles on the lakes :
*Local MN DNR Enforcement - officers checking for compliance would be hampered without wheeled transportation to the lake prior to snow fall, some years snow is scarce. By the time the road is constructed the fishing and spearing is almost over.

Table 4. EL2000 – Elements: Proposed Zoning

Concern Statement 12: Commenters supported the proposed creation of moderate and low use zones.

Correspondence Id: 1 **Comment Id:** 1181326

Comment Text: I appreciate creating different zones based on the number and size of shelters. As a wheelhouse owner, I see the moderate use area as an opportunity I would want to use.

Correspondence Id: 4 **Comment Id:** 1182032

Comment Text: I feel the distinguishment of moderate to low-use zones is a beneficial way to maintain certain areas of the park while allowing for more flexible and safe visitor use

Correspondence Id: 44 **Comment Id:** 1183519

Comment Text: I agree that some areas i.e Sand Point, Namakan, Mukooda, etc should be low use areas. There's no reason for anything other than snowmobiles and portables to be there. However, Kab and Rainy should allow vehicle travel other than snowmobiles to access the lake to fish.

Concern Statement 13: One commenter suggested that maps showing the proposed moderate and low use zones should be revised to clarify current access areas and proposed zoning. Another commenter suggested that the names of the zones be revised to clarify that they only apply to activities on frozen lake surfaces. Additional commenters raised the following questions:

- How would the park monitor and enforce use within the proposed zones?
- How would the park inform visitors of authorized activities within the proposed zones?
- How would the zone boundaries be indicated on frozen lake surfaces in the park?

Correspondence Id: 39 **Comment Id:** 1183511

Comment Text: I would also agree with the many commentors who suggested that the actual map showing the proposed moderate and low use zones need to be accurately represented. They are not accurate according to the current rules and regulations nor with the proposed ones. Please remake the map. This will also demonstrate the tiny amount of access being "given" to the common man wishing to use the park. If this change could be made and map made public?

Correspondence Id: 116 **Comment Id:** 1183924

Comment Text: Finally, how will NPS educate visitors about the various zones and restrictions in any proposed alternative? It may not be readily apparent to visitors where zones are and where they end when they are out on the frozen lake surfaces.

Correspondence Id: 121 **Comment Id:** 1183960

Comment Text: If the park feels the zones are necessary, we suggest clarifying them as "moderate and low frozen lake use zones" to be clear that they spatially delineate acceptable and unacceptable winter use on frozen lake surfaces only.

Correspondence Id: 116 **Comment Id:** 1183921

Comment Text: However, the initial alternative creates two management zones (moderate use and low use zones) that seem to create its own enforcement challenges. How does NPS intend to monitor and enforce uses in these different zones on two different lakes, or monitor and enforce uses in any other alternatives that are developed?

Concern Statement 14: Commenters stated opposition to the creation of the proposed low use zone. They indicated that regulating the low use zone was unnecessary because it gets very low use already, and they did not support the need to remove unoccupied ice shelters.

Correspondence Id: 89 **Comment Id:** 1183637

Comment Text: I do not see the need for the proposed Low use Zone, because it is barely used now.

Correspondence Id: 119 **Comment Id:** 1183947

Comment Text: I would also oppose the so called low use fishing zones proposed. Why? From my observations there are only a handful of fish houses out on the lakes and to pull them home every day and back out the next just seems pointless.

Correspondence Id: 123 **Comment Id:** 1183991

Comment Text: We are not in favor of designating a low use zone and suggest that the proposed points be abandoned.

Concern Statement 15: Commenters indicated that the creation of zones seemed unnecessary.

Correspondence Id: 86 **Comment Id:** 1183632

Comment Text: The proposed Use Zones only works in favor for VNP. Please do not over restrict the National Park because there may be less than 1% that is the real issue. Which I'm not clear what the real issue is for the restricted access to the frozen lake proposal.

Correspondence Id: 121 **Comment Id:** 1183958

Comment Text: Given that the park ice roads are currently compliant with federal regulations, the creation of new moderate and low winter use zones within the park seems unnecessary from a regulatory perspective.

Concern Statement 16: One commenter suggested that the plan eliminate the creation of the zones and instead limit the activities proposed to be allowed in the moderate use zone to park ice roads.

Correspondence Id: 121 **Comment Id:** 1183959

Comment Text: An alternative scenario could eliminate the creation of the zones and instead use the park ice roads (as established each year) as the physical basis for activities currently tied to the moderate use zone in the preliminary plan.

Concern Statement 17: Commenters indicated that it is unclear how prohibiting overnight placement of unattended ice shelters in the low use zone would avoid or minimize adverse impacts on park resources or visitor use and experience.

Correspondence Id: 123 **Comment Id:** 1183986

Comment Text: With respect to the low use zone, it has been proposed that no ice structure shall be left unattended (only permitted when actively used). We fail to see how this would minimize or avoid adverse impacts to visitor experience and our natural resources. What are the issues you have identified with respect to leaving an ice house unattended in a “low use zone”?

Correspondence Id: 91 **Comment Id:** 1184055

Comment Text: In the low use zone proposed, that is now already used by snowmobiles, one would not be able to leave a structure overnight, unless occupied. So, travel all the way to be somewhere with greater solitude in VNP, and have to pack it all out the same day.....what harm is it to leave it until it will be removed permanently? Again, a fee could be possibly charged for the structure to be on the lake.

Concern Statement 18: One commenter suggested that the plan limit overnight placement of ice shelters in the proposed moderate use zone to limit adverse impacts on park resources.

Correspondence Id: 121 **Comment Id:** 1183972

Comment Text: We would encourage the park to consider an alternative scenario that limits unoccupied overnight shelters to the moderate use zone (should the park decide to establish management zones).

Correspondence Id: 121 **Comment Id:** 1183975

Comment Text: We believe that reasonable controls should be evaluated for ice fishing shelters in the moderate use zone that would help prevent Voyageurs experiencing the types of adverse impacts seen on other large lakes in the region while maintaining robust ice fishing opportunities for visitors and gateway businesses alike.

Concern Statement 19: One commenter was opposed to allowing ice shelters to be left unoccupied in low use zones, noting that visitors should be able to enter the low use zone of the park and experience a wild landscape.

Correspondence Id: 121 **Comment Id:** 1183971

Comment Text: Voyageurs Conservancy seeks to balance the long-term preservation of the wild character of the Voyageurs landscape with sustainable human access. With that said, we do not support leaving unoccupied ice fishing shelters all season in the low use zone (should the park decide to establish management zones), and favor a continuation of the current practice of portable shelters transported in via snowmobile. While the number of semi-permanent shelters (i.e., small skid houses) that may be left in low use zones is likely low given the effort required to transport them in, we believe the ability to enter that part of the park and experience a truly wild, unoccupied viewscape/landscape to be an important aspect of the park experience for multiple types of park users.

Table 5. EL3000 – Elements: Mukooda Truck Portage

Concern Statement 20: One commenter asked that the plan more clearly state that the Mukooda Truck Portage would remain available by permit, despite its location in a proposed low use zone.

Correspondence Id: 28 **Comment Id:** 1183421

Comment Text: I noticed that the Mukooda Truck portage is listed in “moderate use area” as continuing to be available by permit. But it appears that the Mukooda Truck portage is in the “low use area”. The “low use area” does not allow ice roads. I think it needs to be made clearer that Mukooda Truck will remain as currently available by permit in the “low use area”.

Concern Statement 21: One commenter requested the park to continue issuing permits for ORVs on the Mukooda Truck Portage. Another commenter supported allowing limited use by permit on the Mukooda Truck Portage, noting that the portage was used to access the Lac La Croix First Nation and was supposed to be closed when the road to the reservation was built.

Correspondence Id: 28 **Comment Id:** 1183423

Comment Text: Further the permit for ORV on the Mukooda Truck has worked well in the past. I recommend it be continued in our new plan.

Correspondence Id: 97 **Comment Id:** 1183812

Comment Text: The Mukooda Truck Portage was used in the past for access to the Lac La Croix First Nation and was to be closed once the road to the reservation was constructed. It is appropriate to allow very limited use by permit only.

Table 6. EL4000 – Elements: Ice Roads – Use and Location

Concern Statement 22: Commenters were opposed to the park plowing ice roads. Some commenters said that creating ice roads is outdated and too costly and unnecessary because of the new all-terrain vehicle (ATV) technology. Some commenters supported the idea of no ice roads because they felt it could help reduce crowding and pressure on the lake. Commenters also argued that the park should not spend money on plowing roads because the resources would be better spent elsewhere on year-round trails for ATVs, snowmobile trails, and ski trails.

Correspondence Id: 3 **Comment Id:** 1182026

Comment Text: With the newer ATV and track mobiles plowing a road for autos seems costly and old school.

Correspondence Id: 7 **Comment Id:** 1182044

Comment Text: No plowed roads on the lake

Correspondence Id: 30 **Comment Id:** 1183425

Comment Text: The plowed ice roads that VNP have established have been a failure due to the conditions the last few years. My opinion is the park doesn't have adequate staff, time or compassion to maintain these ice roads. So my suggestion is to not do an ice road at all. Let the people use the park "as is". If they have the means to go out with snowmobiles and tracked machine they should have that opportunity.

Correspondence Id: 71 **Comment Id:** 1183599

Comment Text: I would prefer the Park Service abandon building the ice roads (which don't always appear to be the best use of our tax dollars) and let the folks who venture out in the winter to do as we have always done to enjoy the lakes without unnecessary and burdensome restrictions.

Correspondence Id: 30 **Comment Id:** 1183429

Comment Text: In closing my final point would be to ban any ice roads done by the park or private individuals. It would keep the pressure off of these lakes and not turn them into a Lake of the Woods situation

Correspondence Id: 3 **Comment Id:** 1182030

Comment Text: Plowing roads should not be park service cost. Maintaining good trail systems for ATV's year-round and snowmobiles in season, & ski trails should be the priority.

Concern Statement 23: Commenters were concerned that the park would not have the resources to plow and maintain ice roads and worried that the park would use a lack of funding and staffing to further restrict where ice roads are built. Commenters noted that because ice roads would rely on funding, staff availability, and ice

conditions, visitor access could be inconsistent and limited. Commenters also noted that conditions on Rainy Lake would prevent the park from plowing ice roads there.

Correspondence Id: 25 **Comment Id:** 1183762

Comment Text: How does the park intend to create/maintain a significantly larger ice road area that is available during the appropriate season, when it currently can only somewhat manage a much smaller ice road (less than 1/10th of that proposed)? we see funding and staffing being used as scapegoat reasons/excuses to never achieve the ice road area proposed.

Correspondence Id: 120 **Comment Id:** 1183952

Comment Text: And about this claim of there being an ice road that is created and maintained... Using the "iceroad" as part of the basis for your argument should put a responsibility on the Feds. ex: if the ice road is in and maintained then here are the expectations for those using it. If the ice road is NOT being maintained, then here are the new expectations. You can't hold everyone else accountable 100% of the time, and not hold yourselves accountable to the same degree.

Correspondence Id: 106 **Comment Id:** 1184073

Comment Text: • The park has hardly been able to make any of the ice roads in the last 5 years, again restricting access to the park and again crowding people closer and closer together.

Correspondence Id: 44 **Comment Id:** 1183526

Comment Text: Park users cannot rely on the park to plow a road to access areas, due to conditions on the big lake.

Correspondence Id: 129 **Comment Id:** 1184004

Comment Text: The Park Service continues to request information on where they should build ice roads. Their history of building ice roads is extremely poor, understanding that mother nature plays a major role where it can be very challenging or impossible to accomplish.

Correspondence Id: 48 **Comment Id:** 1183786

Comment Text: I'm writing in the strongest possible opposition to the preliminary proposal, or any proposal that regulates all traffic other than snowmobiles to ice roads. I oppose it for the simple reason that ice roads are, in your own words, based on weather conditions, staff availability, and funding. One should certainly add to that the most obvious one...ice conditions. The only one of these conditions that one could consider reliable is funding based on congressional spending tied to the Great American Outdoors Act of 2020. All other conditions are suspect at best. Staff shortages, weather conditions and certainly ice conditions have been so inconsistent in the last several years that only a very small fraction of the proposed miles of roads have been open.

Correspondence Id: 86 **Comment Id:** 1183628

Comment Text: We know it's unrealistic VNP can or will plow an ice road as they have indicated on the map provided. In their own words they have been unable to do so for a number of years because of weather/ice conditions, lack of staff and/or funding.

Correspondence Id: 100 **Comment Id:** 1183825

Comment Text: The park hardly plows any roads anymore compared to past years.

Correspondence Id: 108 **Comment Id:** 1183852

Comment Text: The idea that one can only access the Park on Park plowed roads borders somewhere between asinine and absurd. Due to lack of Park staff, many Park roads would not be plowed, that would have a dramatic negative impact on the local businesses and resorts if they are not allowed to access the lakes.

Concern Statement 24: One commenter expressed appreciation for the Dryweed loop of the ice road.

Correspondence Id: 98 **Comment Id:** 1183816

Comment Text: The Dryweed loop of the ice road is appreciated and a nice addition.

Concern Statement 25: Commenters expressed concern that the plan would limit their ability to fish to a narrow corridor along ice roads and would prevent homeowners from fishing if the ice road did not connect to their house. Commenters also noted that ice shelters are typically placed over good fishing spots and that having the park decide where to plow ice roads would restrict fishing opportunities.

Correspondence Id: 38 **Comment Id:** 1183507

Comment Text: With the proposed restrictions I would be forced to fish in a narrow corridor along the ice road assuming the park can even get an ice road plowed.

Correspondence Id: 5 **Comment Id:** 1182661

Comment Text: These are normally placed over good winter fishing spots that have little to do with where the park service may or may not decide to plow a road. And if you decide that no road is to be plowed (likely) then virtually no fishing from shelters could take place within the park as I understand the proposal.

Correspondence Id: 109 **Comment Id:** 1183875

Comment Text: We are out fishing before any ice road is plowed and the road may not even be in the same place from year to year? Take away the UTV and my means of getting out on the lake is taken away also. The people that have Homes or Cabins on the lake shore cannot use a UTV to go fishing because the plowed ice road doesn't go near their Home?

Concern Statement 26: Commenters expressed concern that restricting use of ORVs to ice roads and parking areas would remove access to much of the frozen lake surfaces.

Correspondence Id: 34 **Comment Id:** 1183447

Comment Text: The ice road only covers the South shore. There are many other areas of Kab. that you would be shutting off if you add the restrictions mentioned in the plan.

Correspondence Id: 58 **Comment Id:** 1183799

Comment Text: Lake Kabetogema is roughly 25,700 acres, the ice road only provides access to a very small percentage of that.

Concern Statement 27: Commenters requested clarification and justification for why 300 feet from the edge of ice roads was chosen as the limit to the parking area. One commenter asked the park to eliminate the 300-foot parking area around ice roads, suggested that the area would be too restrictive. Commenters also asked how the 300-foot area would be delineated and enforced. Some commenters felt that the 300-foot area was arbitrary and did not think that placing ice shelters farther than 300 feet from ice roads created an issue.

Correspondence Id: 91 **Comment Id:** 1184048

Comment Text: The Ice Road on Kab in the last 3 or 4 years has been basically plowed to the sledding hill. There was some years the ice road has been plowed to Ash River. This is discretionary, depending on the frozen water, personnel, etc. The area being proposed to be able to be accessed is 300' off the ice road, the difference from one year to another that would apply could vary greatly. This 300' number arbitrarily was given by the current park superintendent, who was not able to give a definitive answer as to "why" this number was chosen.

Correspondence Id: 91 **Comment Id:** 1184049

Comment Text: Omit the parameter of 300' off the ice road.

Correspondence Id: 91 **Comment Id:** 1184052

Comment Text: If there is not an ice road, the Park has the idea to post stakes, and GPS coordinates should be used to determine the 300' parameter. How ridiculous is this? This would be "assuming" that individuals have access to GPS. Again, this 300' is an arbitrary number given by the park superintendent.

Correspondence Id: 89 **Comment Id:** 1183639

Comment Text: As far as the Ice Roads, I haven't use them and haven't seen a problem with vehicles with large fish houses going farther than 300' off of them.

Correspondence Id: 116 **Comment Id:** 1183922

Comment Text: The initial alternative also creates a 300-foot buffer zone on either side of the plowed ice roads to allow visitors to reach fishing locations away from the road. How did the park determine the size of the buffer zone and how will the park enforce this buffer zone or any kind of buffer in additional alternatives?

Correspondence Id: 136 **Comment Id:** 1185028

Comment Text: ATV Minnesota does not support restricting ATV travel to within 300 feet each side of plowed ice roads. This is unnecessarily restrictive. During the winters of 2021-22 and 2202-23, the Park Service had less than two miles of plowed ice roads because of heavy snow. Under the proposed plan, this essentially closes the Park to winter ATV use.

Concern Statement 28: Commenters noted that ice roads would not be available until well into the ice season because they require a certain thickness to plow. Commenters were concerned that this requirement would limit the period that they could access the frozen lake surface. Some commenters noted that there is adequate ice earlier in the winter that ORVs could access without ice roads. One commenter explained that they appreciate ice roads, but they do not believe they should be the only way to access the lakes.

Correspondence Id: 48 **Comment Id:** 1183787

Comment Text: There are other obvious issues with basing access on these largely non-existent roads. By virtue of the significant thickness of ice necessary to support a plow vehicle, these roads are not able to be opened until well into the ice season. Significant slush issues on all areas of Lake Kabetogama have closed the ice road, short as it is, very early in the spring.

Correspondence Id: 48 **Comment Id:** 1183790

Comment Text: This proposal flies in the face of increased access and seeks to restrict access significantly, especially when we consider that the proposed roads simply cannot be available most seasons for any period of time, if at all.

Correspondence Id: 58 **Comment Id:** 1183801

Comment Text: A lot of times the ice road itself can be an issue in accessing the lake. Many years, the ice road isn't available until late January or early February. Per the Voyageurs National Park Facebook page, in 2023 the ice roads were not open until February 4th and the Kabetogama Visitor Center was closed on March 18th which is severely limiting the ice fishing season for those with no access to a snowmobile especially for those targeting walleyes which ends the end of February. There is plenty of ice earlier in the season that is only accessible with ORV use.

Correspondence Id: 107 **Comment Id:** 1183838

Comment Text: The ice roads are nice if they get built, but they should not be the only way to access the lakes (other than snowmobiles).

Concern Statement 29: Commenters were supportive of limiting the use of ORVs to ice roads on Kabetogama and Rainy Lakes.

Correspondence Id: 97 **Comment Id:** 1183810

Comment Text: Considering Voyageurs allowed the use of ORVs/ATVs over time, the park's proposal is reasonable in that it limits the use to Kabetogama and Rainy Lakes where ice roads are already developed.

Concern Statement 30: One commenter noted that the State of Minnesota allows the public and anyone else to build ice roads on public waters. The commenter asked the park to build ice roads to meet its "mission and access the land it owns."

Correspondence Id: 129 **Comment Id:** 1184006

Comment Text: The Park Service should build ice roads wherever it wants to in order to meet its mission and access the land it owns. BUILDING ICE ROADS IS ALLOWED BY THE STATE OF MINNESOTA, AS IT IS FOR THE PUBLIC AND ANYONE ELSE ON WATER OWNED BY THE STATE OF MINNESOTA.

Table 7. EL5000 – Elements: Fees and Permits

Concern Statement 31: Commenters expressed opposition for introducing access fees, including access fees for the use of ice roads in the park because there are no fees to access the park during the summer and use of an ice road is weather-dependent. Commenters also stated that such fees would disproportionately affect local park users.

Correspondence Id: 16 **Comment Id:** 1182664

Comment Text: I also oppose user fees on ice roads. A draw for local use of our national park is the lack of fees.

Correspondence Id: 39 **Comment Id:** 1183510

Comment Text: The first comment I have is regarding the proposed fee for using the ice road. I have many issues with this idea. First, being as an ice road is completely weather dependent, the park cannot come to depend on a stream of fees and income being generated from this. This ice road as it currently has been plowed and maintained is short. We're not being given access to even 20% of the park with this road. My guess is it is less than 2% access--charging a fee for that seems asinine. The amount of visitors to VNP has us ranked 48th out of 62 and my guess is it is MUCH LOWER in the winter, so the fee you propose charging would be to locals-- a small pool to go after in my estimation. This is also a barrier in equity of access to all. And we all know how much that is being pushed politically.

Correspondence Id: 52 **Comment Id:** 1183538

Comment Text: Currently there are no fees to access the lake in the summer months. The proposed fee to use the winter road is a barrier to entry and could and more likely will decrease access to a portion of the current users.

Correspondence Id: 52 **Comment Id:** 1183539

Comment Text: Currently the park maintains parking lots, hiking trails, ski trails, waterways in the form of navigational and hazard markers. No user fee is charged this service. Why target the ice road which is up to the park's discretion as to when or if it is plowed and opened.

Correspondence Id: 105 **Comment Id:** 1183834

Comment Text: We should not need to pay a fee to access these roads. Period!!

Correspondence Id: 131 **Comment Id:** 1184019

Comment Text: The park should not charge for access to the plowed ice roads and trails. You have to consider the fact that most years the roads don't even get plowed until later in the winter.

Correspondence Id: 56 Comment Id: 1183554

Comment Text: There should be no issue in Federal funding to justify charging people for parking or for using public accesses. If implemented you will see a decline in tourism, local businesses affected, and a lack of participation in many activities that occur in VNP. People do not want to spend extra money on things that have always been & should always be available and accessible to them free of charge. If that's the case they will just use Public Access to get on to the lake and do various activities outside of the park to avoid all of the unnecessary fees and excessive enforcement the park seems to hold over people.

Correspondence Id: 57 Comment Id: 1183556

Comment Text: The park was put in place for the people to USE and I think that we pay enough in taxes and fees already (state surplus!!!!) You are driving people away with this insaneness!

Correspondence Id: 68 Comment Id: 1183590

Comment Text: As for teh park fees. We pay so much for taxes already. These fees make these parks and other recreation opportunities cost prohibitive. The parks should be recieving more funding through the government!

Correspondence Id: 127 Comment Id: 1183998

Comment Text: The fees that are proposed, such as parking, I do not agree with. Everyone, regardless of income should be able to come and enjoy the park, without having to pay.

Correspondence Id: 127 Comment Id: 1184001

Comment Text: fees should never be imposed on any lake, including those in the park.

Concern Statement 32: One commenter suggested that park users who own property on the lakes should be exempt from user fees.

Correspondence Id: 131 Comment Id: 1184020

Comment Text: At a minimum, those that own property on the lakes should be exempt from the fees.

Concern Statement 33: Commenters stated support for a permitting system and/or associated fees for visitor use activities on frozen lakes in the park. One commenter suggested that fees be collected via point-of-access payment methods rather than an online payment platform.

Correspondence Id: 60 Comment Id: 1183565

Comment Text: The only reasonable change is adding a user fee for the ice road if the park service maintains it. The fee should also be reasonable.

Correspondence Id: 85 Comment Id: 1183625

Comment Text: As far as VNP fees, I would be against fees for parking in VNP parking lots, especially in winter when numbers of visitors are minimal. In general, it seems in the least "unfriendly" and "unwelcoming" for any time of the year. A yearly fee for an icehouse might be acceptable, if kept minimal.

Correspondence Id: 91 Comment Id: 1184050

Comment Text: If an individual, or business wants to travel to an area to fish, recreate, or set a stationery shelter to fish/camp on the ice surface, perhaps a fee could be charged to set up their shelter and camp.

Correspondence Id: 121 Comment Id: 1183957

Comment Text: If the park believes ice road creation and maintenance is not sustainable without incremental funding to support it, we suggest exploring other means that may be more consistent with how summer use fees are assessed. Fees for overnight ice shelter placement, which is a common practice at other large area lakes

where access is controlled via ice roads, could be considered as part of an alternative scenario. Should the park decide to proceed with an ice road access fee, we suggest simple point of access payment methods (e.g. kiosk drop box) versus requiring visitors to pay via recreation.gov.

Correspondence Id: 25 **Comment Id:** 1183784

Comment Text: Could some sort of permitting help with this? Maybe. It would give the park a better idea of how many vehicles of what types are enjoying the ice. It would bring in some winter revenue to help with trail maintenance. And it would make winter users of the park more mindful of the safety issues associated vehicles and equipment on the ice. Summer boaters are not required to have any special permit (and we are absolutely not advocating for that). But we believe there are issues unique to winter that may make permits a more appropriate way to manage park visitor experiences.

Correspondence Id: 25 **Comment Id:** 1183750

Comment Text: Snowmobiles are required to have a state sticker which in part funds trails. Having some sort of permitting system (seasonal, 1-day, weekend, one week) could generate funds to help manage ATV/UTV trails or corridors within the park.

Concern Statement: 34 Commenters stated opposition to a permitting system and user fees for visitor use activities and associated park maintenance on frozen lakes in the park.

Correspondence Id: 83 **Comment Id:** 1183621

Comment Text: Requiring permits to use the frozen surface is an overreach.

Correspondence Id: 108 **Comment Id:** 1183864

Comment Text: There should be public input on park fees for fish houses and parking fees, as well as where fish houses can be located. Again, we were made promises that we could use the lakes as was done in the past. Local residents should not have to pay fish house fees and parking fees to use their lakes.

Correspondence Id: 116 **Comment Id:** 1183925

Comment Text: NPCA generally supports collection of user fees in national parks to offset budget shortfalls and support staffing and programming needs of the park. However, if the fee is meant to help fund maintenance of the road itself, there may be alternate funding sources that can be utilized in addition to or in lieu of fees.

Concern Statement 35: One commenter stated that the NPS should address in the plan how it would determine the appropriate fees, which user groups would need to pay fees, how fees would be collected, and how fees would be enforced.

Correspondence Id: 116 **Comment Id:** 1183926

Comment Text: NPS should also address how it will determine the appropriate fee and who should pay them. Will every road user be required to pay even if they are accessing private property and not fishing? How will these fees be collected? And how will NPS enforce the fee requirement?

Concern Statement 36: One commenter stated that the park should conduct surveys prior to implementing user fees to determine if the fee requirement would be enforceable.

Correspondence Id: 121 **Comment Id:** 1183956

Comment Text: VC generally supports user fees that allow NPS to better fund park operations and manage sustainable levels of use. However, we express concerns that charging a daily and/or seasonal ice road access fee is being imposed without any surveys and will be difficult to enforce, therefore unfairly burdening visitors who abide by an honor system of compliance.

Concern Statement 37: One commenter asked the park to make permits for ice roads easily accessible online and available immediately.

Correspondence Id: 98 **Comment Id:** 1183815

Comment Text: Also, any ice road permit would be a negative to ice road use. Mostly access and not cost. Obtaining a permit need to be accessible online and immediately available.

Concern Statement 38: Commenters noted that if Commercial Use Authorization (CUA) holders are allowed to leave unoccupied ice shelters in place overnight in the low use zone, non-CUA holders should be allowed to do the same.

Correspondence Id: 123 **Comment Id:** 1183988

Comment Text: What is the difference if a Commercial Use Authorization permit allows long term sheltering in place verses a legally licensed fish shelter left in place for long term? When a structure used for fishing is licensed and is in compliance with the state law, a "low use zone" should not negate that privilege.

Correspondence Id: 121 **Comment Id:** 1183973

Comment Text: If the park moves forward with allowing unoccupied overnight shelters in the low use zone, we feel that regular park visitors should have this option as well. Limiting it to commercial use authorization holders could create a situation of inequitable access to prime fishing spots within easy access of the park's snowmobile trails.

Table 8. EL6000 – Elements: Ice Shelters

Concern Statement 39: Commenters disagreed with the limitations on ice shelters, noting that they should continue to be used throughout the park regardless of size because limiting locations based on size would adversely affect visitor use and experience and limit access for both the public and residential property owners. Commenters also noted that concessionaires should not be subject to the same restrictions on ice shelter placement as visitors and that access should be granted as part of their concessions permit.

Correspondence Id: 25 **Comment Id:** 1182706

Comment Text: We also believe the proposal is missing the mark on ice houses. Again, people have been ice fishing here for more than decades. And as ice houses have evolved, fishermen also know that their newer, fancier, heavier ice houses require more ice. They don't want to be injured or lose equipment on the ice! Ice fishing, shanties, camper shacks are a tradition in Minnesota, and should continue to be permitted to be used throughout the park.

Correspondence Id: 25 **Comment Id:** 1183757

Comment Text: Areas where local outfitters place their ice fishing houses are tested by those outfitters to ensure the safety of their equipment and guests. They are required to have a concession permit and should be excluded from limitations to ice house placement.

Correspondence Id: 25 **Comment Id:** 1183758

Comment Text: Limiting all ice houses that require a larger vehicle to be placed along an ice road would diminish visitor use and experience.

Correspondence Id: 108 **Comment Id:** 1183856

Comment Text: I would have a tough time removing the fish house each day as would many people who fish on the lake in the winter. People my age would have to pay someone, and many could not afford that cost on their social security income. They would not be able to use the park because of the new proposed rules. Is that the true intent of this Plan??

Correspondence Id: 133 **Comment Id:** 1184102

Comment Text: We are in agreement that viewpoint and fail to see why the size of a vehicle and whether an ice shanty is homemade or a manufactured camper makes any difference as to being allowed on the ice.

Correspondence Id: 69 **Comment Id:** 1183592

Comment Text: The impact ice fishing in Voyageurs National Park is miniscule with very few houses out throughout the park. I am an avid snowmobiler as well and see all parts of Voyageurs and there very few ice houses compared to other popular ice fishing destinations.

Correspondence Id: 110 **Comment Id:** 1183880

Comment Text: Requiring a conditional use permit for personal-use ice houses and regulating the types of vehicles that can be used to access the lake is an overreach of authority.

Correspondence Id: 114 **Comment Id:** 1183904

Comment Text: I read about the concern of the newer larger ice houses. I agree that they have evolved over the last decade or two quite rapidly. However, I do not see the difference between these and a houseboat. Houseboats are allowed to travel freely in the waters of VNP. Both have self contained black water systems. Along with that, most larger ice houses will not travel off the main trails/paths because of the possibility of becoming stuck. However, if the individual wants to go to the work of venturing out, I do not see the issue with that. Both still have the responsibility to move/remove said dwelling when and as conditions dictate.

Concern Statement 40: Commenters identified potential issues with the proposed restrictions on placement of ice shelters, noting that while ice shelters can be placed by snowmobiles, larger vehicles may be required to remove them. Commenters noted that concentrating larger ice shelters in smaller locations could affect certain areas of the lake by increasing crowding and diminishing visitor experience.

Correspondence Id: 25 **Comment Id:** 1183759

Comment Text: Many ice houses can be placed by snowmobile but may require larger equipment to move/remove them if they are stuck.

Correspondence Id: 25 **Comment Id:** 1183760

Comment Text: Concentrating ice houses in one area also puts a greater weight/movement impact on just one area of the lake.

Correspondence Id: 25 **Comment Id:** 1183775

Comment Text: Even ice houses that can be towed & placed by snowmobile may require larger equipment to remove if they ice in.

Correspondence Id: 52 **Comment Id:** 1183540

Comment Text: The proposed rule to limit the placement of some ice shelters to within 300 feet of the road will actually concentrate the placement of these shelters to along the road. This would seem to actually contribute to the concern regarding crowding. I attended the virtual presentation and noticed the picture of concentrated shelter placement was from another lake not in the park. Are you looking to implement a rule that addresses crowding that does not exist now or in the future?

Correspondence Id: 106 **Comment Id:** 1184071

Comment Text: The plan forces people to set up their ice fishing shelters in one specific area of the lake, instead of letting people choose where they want to fish in their wheeled ice houses. It will just look like an ice fishing city all gathered in one area of the lake.

Correspondence Id: 106 **Comment Id:** 1184072

Comment Text: People should be able to tow their wheeled ice houses anywhere they want on the lake, people will disperse in different areas of the lake, and it will look like there are less people on the lake. It is usually impossible to tow the larger houses with a snowmobile, and it will force people with ATV's, UTV's and other vehicles to crowd along the ice road and no one wants to see that, and no one wants to fish that close to other people, especially on Kabetogama.

Concern Statement 41: Commenters requested additional information regarding ice shelter use, including how many ice houses are regularly left on the ice for the winter season, is that number growing or declining each year, what is the number of ice houses that the NPS would consider overcrowding, and what could trigger a reduction in ice houses in the future, noting the current proposal does not propose any specific guidelines for ice shelter use. Another commenter asked the NPS to identify the type of ice shelter that was a concern. Commenters suggested ice shelter placement and use could be the same for all frozen surfaces (i.e., prohibiting placement on snowmobile trails and requiring ice to have a certain thickness); following these rules would be the responsibility of the ice shelter owner.

Correspondence Id: 116 **Comment Id:** 1183919

Comment Text: NPS noted concerns related to overcrowding and the potential to limit the number of ice houses in the future. The initial alternative does not indicate how many ice houses on average are being left on frozen lake surfaces during the winter fishing season and if that is trending upward or downward. How will NPS determine what it considers overcrowding? What resource impacts or other factors will trigger placing limitations on the numbers of ice houses in the future?

Correspondence Id: 120 **Comment Id:** 1183950

Comment Text: What type of ice shelter used for fishing is a legitimate concern?

Correspondence Id: 121 **Comment Id:** 1183970

Comment Text: Other than how ice fishing shelters are transported in the park, the preliminary plan does not propose any guidelines on ice fishing shelter types, capacity, or most overnight use on any of the park's frozen lake surfaces. The preliminary plan makes the current practice of visitors plowing their own spurs off ice roads to clear an area for their shelter compliant with regulations if the spurs remain within the 300-foot buffer, which we support.

Concern Statement 42: One commenter stated that large ice shelters are incompatible with the park's mission.

Correspondence Id: 97 **Comment Id:** 1193054

Comment Text: large ice shelters are incompatible with the mission of Voyageurs National Park.

Table 9. IS1000 – Issues: Natural Resources

Concern Statement 43: Commenters indicated that ORVs do not result in additional impacts on natural resources compared to snowmobiles.

Correspondence Id: 25 **Comment Id:** 1183770

Comment Text: ORVs do not make any significant difference in noise or motion compared to snowmobiles that would negatively impact wildlife.

Correspondence Id: 25 **Comment Id:** 1183779

Comment Text: "Water and Air Quality": Regarding ORVs, we believe their impact would be no different than snowmobiles. It may even improve air quality due to better/newer engines, and the ability of fewer machines to carry more people. So long as people ride safely, there should be no significantly different impact between ORVs and snowmobiles as regards to water or air quality.

Correspondence Id: 31 **Comment Id:** 1183431

Comment Text: I'm having trouble seeing the difference in environmental impact that a tracked side by side has vs a snow machine

Correspondence Id: 48 **Comment Id: 1183791**

Comment Text: The ATV/UTV vehicle, especially when tracked, are more emissions efficient than snowmobiles, quieter than snowmobiles, operate at much lower speeds than snowmobiles, and leave a softer footprint than a snowmobile. These vehicles on the ice are no threat to any of the resource considerations one might have that require your protection. The footprints they leave behind are erased after each snowfall and the canvas is completely reset with every Spring thaw. Each winter the frozen lake reverts to what it has looked like for generations past, and each time the lake freezes for future generations it will look the same. Restricting access to these vehicles makes no sense when you consider they are no threat.

Correspondence Id: 121 **Comment Id: 1183961**

Comment Text: Like snowmobiles, ORV tires and/or tracks do not physically damage a temporary frozen lake surface.

Concern Statement 44: Commenters stated that the plan should consider climate impacts associated with greenhouse gas emissions from ORV use and that a plan should include adaptive management to adjust to future conditions.

Correspondence Id: 4 **Comment Id: 1182034**

Comment Text: First and foremost, it is critical to consider the impact of the changes in land usage in the park on frozen lakes. Will the increase in ORVs cause a significant increase in greenhouse gas emissions?

Correspondence Id: 88 **Comment Id: 1184037**

Comment Text: Furthermore, we live in a changing environment and need to adopt adaptive management as a cornerstone of these very important usage plans and policies. The FLP does nothing to address Climate change nor adaptive management into the future.

Concern Statement 45: Commenters stated that the plan should consider impacts on water quality associated with ice shelter placement, including improper sanitation practices and litter that may be left behind on the frozen lake surface after ice shelters are removed.

Correspondence Id: 1 **Comment Id: 1181964**

Comment Text: Not to mention it might help address the litter allegedly left behind by wheelhouses.

Correspondence Id: 20 **Comment Id: 1182673**

Comment Text: Lake of the Woods is a prime example of what may happen to the water quality in the park. Attention is necessary for protection from human waste. It is obvious to anyone visiting LOW that users have seriously abused this concept. I understand that human waste disposal is a problem for resort owners, municipal waste pick up, and private individuals as where to properly dispose. Seems the lake surface is an acceptable place to dispose this waste by many users. Even feces in biodegradable bags have been dropped in ice holes as a convenient way to dispose of feces. Out of site; Out of mind. Surely the bag and its contents will dissolve???. What about urine deposited by over 6000 users on LOW. The amount of time humans spend over all the lakes surfaces has vastly grown exponentially.

Correspondence Id: 20 **Comment Id: 1182674**

Comment Text: We are attempting to control invasive species, yet we have NO restrictions on human waste. Seems we humans might be a bit over invasive with growing park space usage. It is time for this problem to be addressed to control further abuse. The DNR has neglected to respond to this seriously increasing dilemma. I am hoping the VNP authorities may be instrumental in bringing this issue to the forefront so that the federal management behind the park will institute and create meaningful change for all our water resources. The park eliminated jet skis in the park. It is time to regulate the vehicles that cause potential harm to the ecosystem. We certainly do not have enough outdoor(wilderness-If you can call it that anymore) space for the recreational demands of population growth.

Correspondence Id: 36 **Comment Id: 1183454**

Comment Text: I think this is a great time to look at the environmental impact that ice users have on our lakes. Especially if a vehicle or ice house does go through the ice. In the many years I have fished and used rainy and namican lake I have seen the water become more polluted and it worries me about what out future generations

are going to be left with. This is a gorgeous set of lakes and land that unfortunately most people seem to take for granted and don't seem to understand how fortunate we all are to have the park to preserve the natural beauty of the lakes and the landscape around them!

Correspondence Id: 116 **Comment Id:** 1183917

Comment Text: We support the protection of park resources and imposing limitations that will reduce any resource impacts. However, the park has not indicated what impacts these larger ice structures are having on park resources. The proposal indicates that NPS plans to study several issues associated with ORV and ice shelter use on frozen lake surfaces, including visitor use and experience, sound and lightscapes, wildlife, and air and water quality. If not already included in these categories, we urge NPS to also study human impacts from ice fishing activities, such as buildup of trash/litter on ice surfaces, black water discharge, and fish depletion.

Concern Statement 46: One commenter asked what measures would be implemented to protect wildlife.

Correspondence Id: 4 **Comment Id:** 1182035

Comment Text: What practices will be implemented to maintain visitor safety on frozen lakes while also protecting the natural wildlife in the area?

Concern Statement 47: Commenters indicated that concentrating ice shelters in certain areas could increase environmental impacts in those areas by increasing light pollution and winter light penetration into the lakes, concentrating impacts on wildlife, and increasing fishing pressure.

Correspondence Id: 25 **Comment Id:** 1183764

Comment Text: Concentrating ice houses in a small area along an ice road would increase light pollution in that area, creating a negative impact for those seeking open skies at night both on the ice and on properties along the shoreline. Even if the area is not in line-of-sight, the possibility of concentrated skyglow could be a significant negative impact.

Correspondence Id: 25 **Comment Id:** 1183767

Comment Text: Concentrating ice houses along the ice road may increase negative interactions for land-dwelling wildlife. Smells, fish/bait debris, trash, etc. concentrated in one area are likely to draw in scavenging animals and birds leading to negative consequences.

Correspondence Id: 25 **Comment Id:** 1183768

Comment Text: Concentrated light may affect night-traveling birds and animals.

Correspondence Id: 25 **Comment Id:** 1183769

Comment Text: How would the creation of a large parking lot area affect the fishing in that area? Fishing pressure, increasing winter light penetration potentially increasing weed growth, algae? What does Fisheries say about concentrating fish houses to one area of the lake?

Correspondence Id: 25 **Comment Id:** 1183780

Comment Text: Concentrating ice houses in one area could cause significant negative impacts on water and air quality in that area. A 300 ft wide area along 10 miles of ice road on Kabetogama yields less than 375 water acres for these fish houses on a lake that is over 25,000 acres. It would concentrate fishing and potential pollution to a small area of the lake, with impact on the fish and aquatic life in that area. What does Fisheries say about this?

Correspondence Id: 25 **Comment Id:** 1183781

Comment Text: Will the ice road area also allow more light penetration that could impact plant/algae growth? Continuing to allow fish houses throughout the lake dilutes the negative impacts - the way boats all over the lakes distribute fishing pressure, sound, and noise over a much greater area.

Concern Statement 48: A commenter noted that light from ORVs and snowmobiles does not have significantly different impacts.

Correspondence Id: 25 **Comment Id:** 1183766

Comment Text: Regarding ORV lighting, it would not have significantly different impact from snowmobile headlights. Any vehicle operating should be visible.

Concern Statement 49: One commenter stated that noise associated with ORV use should be limited in the park to protect wildlife and enhance visitor experience.

Correspondence Id: 97 **Comment Id:** 1183809

Comment Text: There are many recreational opportunities throughout the State for ORV/ATV enthusiasts including frozen lake surfaces and thousands of miles of designated trails. A National Park should be a place where visitors can enjoy the scenic beauty and the quiet of winter and where wildlife has a break from summer crowds.

Concern Statement 50: One commenter stated that ORVs and ATVs should be restricted to ice roads to protect resources.

Correspondence Id: 97 **Comment Id:** 1193041

Comment Text: For protection of resources, it is essential that ORVs/ATVs are tied to the ice roads as proposed.

Table 10. IS2000 – Issues: Cultural Resources

Concern Statement 51: Commenters were concerned about how Native American and First Nations peoples' rights and cultural practices were considered in the plan. One commenter noted that First Nations peoples have been ice fishing at the park for hundreds of years and that limiting access to ice fishing would be an infringement on an important traditional use of the park. The commenter suggested that the park could enforce leave no trace principles, under the current management and use to prevent resource damage. Commenters noted that the park is located on Minnesota Chippewa Tribal lands, and that Tribal members and their descendants have hunting, fishing, and gathering rights that should not be infringed upon by the plan. They also asked for all fees to be waived for Minnesota Chippewa Tribal members and that accommodations be made for Tribal members to hunt, fish, and gather on park lands.

Correspondence Id: 88 **Comment Id:** 1184034

Comment Text: the plan does not put enough thought and weight on the historical uses and historical vehicles that have been used on the frozen lake surfaces of Voyageurs. First of all, ice fishing all over the park has been happening since the dawn of the last millennia. First Nations people would maintain spear holes in the ice for weeks and months. To limit this usage limits this important and traditional use of the park. I understand that modern day fishing is much different but with the fishing regulations in place it would be hard to argue that limiting ice fishing is going to damage the resource provided leave no trace requirements are followed (which are already enforceable by VNP enforcement).

Correspondence Id: 108 **Comment Id:** 1183870

Comment Text: The VNP is on American Indian (Minnesota Chippewa Tribe) ceded lands. Therefore, the Indian and their descendants from the Minnesota Chippewa Tribe does have hunting, fishing and gathering rights to the lands that the VNP now occupies. They have these rights under treaties signed by the federal government. I realize that some trust lands were illegally seized by the Park Service when the Park was first established (what else is new), but since then there have been court cases that have stated that Indians do have these rights. A recent case in Minnesota in 2015 that involved my nephew Jerry "Otto" Reyes, the Court not only stated that Indians have hunting, fishing and gathering rights on the Reservation, they have these same rights on ceded lands, (The United States Court of Appeals for the Eighth Circuit, United States of America v Michael D. Brown; Jerry A Reyes; Marc L Lyons; Frederick W Tibbetts on Appeal from the United States District Court for the District of Minnesota Nos. 13-CR- 0068:13-CR-0070 cert. denied). The Indians won in Court with cert. denied by the Supreme Court.

Correspondence Id: 108 **Comment Id:** 1183871

Comment Text: The Minnesota Chippewa Tribal members and their descendants should not be charged Park Service fees, parking fees, license fees, fishing fees, fish house fees or any vehicle fees for their use in the Park. They also have the right to hunt, fish and gather as given in the treaties. This is an individual right, not a tribal right, since tribes did not exist when the treaties were made. The treaties were made with the group as individuals, since the so called Tribe was established under the Indian Reorganization Act in the 1930s. Since the Park does not allow hunting, netting and trapping in the Park, an accommodation should be made for those persons that are allowed these rights under their treaty rights to hunt, fish and gather on ceded lands, either individually in cash or food items. They do have gathering rights, that does not affect the Park, such as berry picking, etc. that should be allowed at no cost to them, as well as to fish free with proof that they are a member or descendant of the Minnesota Chippewa Tribe.

Concern Statement 52: One commenter noted that a variety of vehicles have traversed the ice surface at the park throughout history and restricting types of vehicles would be “historically inaccurate.”

Correspondence Id: 88 **Comment Id:** 1184035

Comment Text: it would be historically inaccurate to limit the type of vehicles on the ice surface. The frozen ice surface has been used by a variety of conveyances. From horse and sleigh to mechanical conveyance since the onset of the industrial age and mechanization. The Koochiching county historical society could speak to this much better, they have a great record of an assortment of different type of vehicles that have graced the frozen ice surfaces of VNP. Again, I think it would be very difficult to argue that small tracked or wheeled vehicles on the ice, frozen lake surfaces, are a damage to the resources of Voyageurs National Park.

Concern Statement 53: One commenter wondered if the current use of frozen lake surfaces has led to cultural or natural resource impacts.

Correspondence Id: 90 **Comment Id:** 1184040

Comment Text: Will the use or activity damage the park's protected natural and cultural resources and other protected values? At meetings, there has been no indication that natural or cultural resources have been damaged.

Table 11. IS3000 – Issues: Socioeconomics

Concern Statement 54: Commenters asked how the plan could affect the local economy, tourism, and businesses. They also asked if the plan would affect marginalized or vulnerable populations, such as Native Americans.

Correspondence Id: 4 **Comment Id:** 1182036

Comment Text: How will this change impact the local economy with more visitors attending the park?

Correspondence Id: 4 **Comment Id:** 1182037

Comment Text: Is this proposal putting marginalized or vulnerable populations at risk in any way, for example, will this impact any native/indigenous lands?

Correspondence Id: 21 **Comment Id:** 1182678

Comment Text: strict rules will hurt tourism and businesses. We're not talking about mining in the boundary waters here and the huge risk to the resource. We're talking rules that are not clear about the natural resource gains but it will hurt business and tourism so why??

Correspondence Id: 86 **Comment Id:** 1183633

Comment Text: How does VNP plan to keep local businesses viable if they limit accessibility? Winter activities in this region are very important to the economy and vitality of surrounding communities and establishments.

Concern Statement 55: Commenters were concerned that the plan would negatively affect tourism, local businesses, and the area's economy by limiting winter access to the park, specifically the economic impacts of limiting the use of ORVs and UTVs. Several commenters noted that the local economy already struggled during the height of the COVID pandemic and worried that the plan would hinder the area's recovery. Commenters were specifically concerned about impacts on the resort and outfitting industries. Some commenters worried

that the plan would discourage people from visiting the area, thereby reducing business for the park and local communities. Some businessowners commented that the plan could cause their businesses to close.

Correspondence Id: 21 **Comment Id:** 1182680

Comment Text: tourism in Northern MN in Winter is tough already, don't handicap it further.

Correspondence Id: 23 **Comment Id:** 1182687

Comment Text: Current ice fishing outfitters will be put out of business, further reducing public access and enjoyment of the nation's least-visited national park. The proposed rules only further jeopardize the area's resort and outfitter community, which are already under enormous financial pressure to stay in business and provide access to Voyageur's National Park.

Correspondence Id: 25 **Comment Id:** 1182697

Comment Text: Expanding opportunities for visitors to enjoy the park year-round is wonderful; limiting them has a negative impact on both visitors and area businesses that rely on the park for their livelihood.

Correspondence Id: 25 **Comment Id:** 1183773

Comment Text: The proposed regulations would effectively destroy the business for local (and long-time) ice fishing outfitters, and the trickle-down effect on all the other businesses that benefit from these winter visitors.

Correspondence Id: 27 **Comment Id:** 1183419

Comment Text: You are taking away people's livelihood and many businesses ability to survive and exist, which helps the area in many more ways.

Correspondence Id: 58 **Comment Id:** 1183802

Comment Text: I also think limiting ORV use will negatively impact local businesses. Ice fishing brings people to the area which then support the local businesses. This would also significantly negatively impact the few local businesses that provide ice fishing guide services as this would prohibit the way their business is ran which is then impacting their livelihood.

Correspondence Id: 61 **Comment Id:** 1183807

Comment Text: Let's promote tourism instead of adding more restrictions

Correspondence Id: 62 **Comment Id:** 1183569

Comment Text: The level of destruction already done to the resorts and family properties leveled in the region just to create VNP was sad enough, but this plan appears to be another method for the NPS to further limit access and use to the area.

Correspondence Id: 63 **Comment Id:** 1183572

Comment Text: This latest Frozen Lake Surface measure is impending doom for the hard working businesses on Kabetogama and the rest of the park.

Correspondence Id: 37 **Comment Id:** 1183500

Comment Text: Because VNP is the only water/ice accessible lake in the nation, the Town feels it should be considered in its uniqueness from other national parks and should keep water/ice access open. Our area is dependent on water/ice travel both for those that live here and for our tourism industry.

Correspondence Id: 41 **Comment Id:** 1183516

Comment Text: This new Frozen Lake Access and use Plan will negatively impact the Future of Voyageurs National Park and our small communities. Our small community of Crane Lake thrives from the snowmobiling, fishing and boating. Please consider keeping the park as it is and allowing snowmobiling, ATV's , UTV's, OHV's, Cars, pickups, tracked vehicles, boats and motors in the park. If this plan moves forward as currently proposed, it will be devastating for area businesses as fewer visitors would come to the area in winter (reducing income) and could potentially put some out of business entirely.

Correspondence Id: 91 **Comment Id:** 1184060

Comment Text: Now, let's address some of the economic issues that VNP seems to be ignoring concerning the area and the impact that ATV's, UTV's, cars, trucks, and other frozen water vehicle use brings to our area.....

Resorts with fishing, lodging, food, bait and tackle for sale Resorts that have fish houses for rent, and ultimately their guest use various alternative methods of travel to access the fish house rentals. Or, the resort owner who transports guests in a vehicle that allows for not only the transportation of the guest, but the capability of putting the fishing "house" on and off the lake, when snowmobiles just will not complete the task. Gas Stations who sell bait, tackle, fishing supplies, snacks, Restaurants who sell meals and beverages to winter visitors We are talking hundreds of thousands of dollars that these businesses depend upon to make their payments, and provide a thriving place for VNP visitors to stay and play in our Northern area.

Correspondence Id: 96 **Comment Id:** 1183647

Comment Text: I anticipate tremendous hardship being imposed on area business owners that are currently recovering from perhaps the biggest economic blow ever encountered as a result of the Covid pandemic.

Correspondence Id: 53 **Comment Id:** 1183544

Comment Text: People have businesses and make their livelihood off of ice fishing. This would ruin their business.

Correspondence Id: 54 **Comment Id:** 1183548

Comment Text: I also believe tourism would be adversely affected as many people who come to the area to enjoy the park and their recreational vehicles will likely choose alternative destinations.

Correspondence Id: 106 **Comment Id:** 1184084

Comment Text: It hurts local business who are just trying to survive. It hurts park user experiences, and it makes the park an undesirable destination during the winter. People will go to other lakes where they are free to access those lakes with any means available to them.

Correspondence Id: 108 **Comment Id:** 1183845

Comment Text: These were secret new rules that DeGross has come up with during the past five years with no community input with his secret Plan that will completely destroy many resorts and local businesses by driving business away

Correspondence Id: 108 **Comment Id:** 1183851

Comment Text: The present proposed plan will have a destructive effect on the local economy, and local residents use of the Park.

Correspondence Id: 108 **Comment Id:** 1183853

Comment Text: The winter income is needed for these businesses to survive.

Correspondence Id: 108 **Comment Id:** 1183854

Comment Text: Not allowing trucks, cars, AVTs, tracked vehicles and fish houses overnight, not only breaks another government promise to the people (sounds like DeGross has dealt with treaty rights of the Indian the way he wants to break Park Service promises) of the Park area, but it will destroy local businesses who rely on the winter business income for their survival.

Correspondence Id: 110 **Comment Id:** 1183878

Comment Text: The proposed frozen lake plan would not only limit access for local community members who use the ice but also affect business owners in the community who choose to remain open during the slower winter months. This includes lodging operators, restaurant owners, local outdoor stores, and even impacts how people choose to visit Voyageurs National Park in the winter.

Correspondence Id: 110 **Comment Id:** 1183882

Comment Text: Implementing the frozen lake plan would not only devastate our lodging operators who choose to remain open during the winter but would also inflict damage on our local economy. From a tourism perspective, if people are unable to access the lake, they will not visit our community and generate economic activity both for our community and for the National Park.

Correspondence Id: 112 **Comment Id:** 1183889

Comment Text: I feel that if this plan is implemented it would be overstepping its bounds and causing hardship for local businesses and guests to VNP.

Correspondence Id: 113 **Comment Id:** 1183898

Comment Text: This is going to have a huge negative impact to local business. Many local businesses cannot stay in business without the winter season business. There are too many to list but many of the items in this plan directly deter people from spending time on Lake Kabetogama due to all the restrictions and proposed additional costs that they will go elsewhere where it is easier, more affordable, etc. Kabetogama Lake was revived after the Canada fishing lockdown with the COVID pandemic and it was depressed for years due to VNP restrictions, we are finally flourishing and ask that you do not negatively impact this and put small family owned business to fail.

Correspondence Id: 26 **Comment Id:** 1183417

Comment Text: A "snowmobile only" mode of transportation would put an end to most of their fishing careers within the park, which would result in less revenue for the resorts, bait shops, and other businesses in the area.

Correspondence Id: 109 **Comment Id:** 1183872

Comment Text: The Business owners were promised increased use of the park, which has never been fulfilled. You want to take more accessibilities away is not going to help business owners.

Correspondence Id: 117 **Comment Id:** 1183929

Comment Text: The Kabetogama, Namakan, Crane Lake and Ash River areas have, and continue to count on tourism traffic for their existence. These areas have been hard hit by the impacts of Covid 19, and recent flooding, which has also negatively affected the economic balance of these communities. The resorts, bait stores, boating establishments, local coffee, and snack shops, have closed or dramatically reduced their operations. Any further restrictions on access of visitors to VNP will have a greater negative impact.

Correspondence Id: 124 **Comment Id:** 1184100

Comment Text: It would also have adverse impacts on property owners, Minnesotans, businesses, surrounding communities, and visitors to the area.

Correspondence Id: 125 **Comment Id:** 1183993

Comment Text: Compare that to the ruins of the livelihoods of some Kab resorts and businesses by severely restricting access points to the lake in winter months. Winter season for some provides a slim margin of viability. They're all hanging by a thread as it is.

Correspondence Id: 130 **Comment Id:** 1184016

Comment Text: Hopefully you reconsider your initial recommendation. It is not good for the people and business in the lake ecosystem.

Correspondence Id: 133 **Comment Id:** 1184104

Comment Text: We believe the proposed restrictions would be detrimental to local use and to local businesses that depend on tourism. The restrictions would discourage people from coming to the park in the winter.

Correspondence Id: 134 **Comment Id:** 1185022

Comment Text: It will definitely put The Rocky Ledge out of business.

Correspondence Id: 134 **Comment Id:** 1185024

Comment Text: If you do this all small businesses will be pushed out and no one will visit this park. You may as well just ask all of us to close.

Correspondence Id: 138 **Comment Id:** 1185035

Comment Text: This is definitely going to have a negative impact on businesses. We are finally flourishing and this plan will deter people from spending time here due to all the restrictions & additional costs.

Correspondence Id: 141 **Comment Id:** 1185041

Comment Text: Our northern Minnesota economy is largely based on outdoor tourism, and the recreational multiple use of our public lands and waters at the park has been an economic driver for our communities for decades. I will continue to do all that I can to ensure it remains this way.

Correspondence Id: 63 **Comment Id:** 1183573

Comment Text: this measure is going too far and will drive out so many businesses and homeowners. Having beautiful lakes to visit is an important thing to have in a National Park. Having no places for people to stay, no restaurants in which people can dine, and no stores in which to shop will NOT be good for the area. The business owners are hard working, honest people who are barely able to keep their businesses going. Please do not let this measure pass.

Correspondence Id: 64 **Comment Id:** 1183575

Comment Text: This will hurt all businesses around the area and will limit access to hundreds of thousands of people that use this

Correspondence Id: 73 **Comment Id:** 1183607

Comment Text: My business brings guests to our area at a time frame when not much else is going on. Snowmobile business usually runs late January through February if snow conditions are good. These same guests' frequent area restaurants, stay at other local lodging establishments and shop at local stores. Some of my guests that come here this is their first experience with the park and many come back during the open water time frames with friends and family.

Correspondence Id: 81 **Comment Id:** 1183613

Comment Text: When the park was established, they stated that there would be no interference with local businesses, and the current proposal under review would definitely hinder resort business in the wintertime. Various businesses promote and encourage Winter Park activities and their entry into the park is other than any use of a snowmobile.

Correspondence Id: 66 **Comment Id:** 1183581

Comment Text: You are proposing to limit tourism opportunities, which will eventually decrease/stop tourism totally with charging fees and limiting the resorts access to their own ice house opportunities.

Correspondence Id: 71 **Comment Id:** 1183600

Comment Text: If you begin restricting ice fishing and vehicular travel during the winter, it will only hurt the local economy and business owners. If you begin charging for parking and access, it will only hurt the local economy and business owners.

Correspondence Id: 86 **Comment Id:** 1183634

Comment Text: People come from many states, not just MN to enjoy winter activities in VNP. VNP should be encouraging more revenue not less. VNP can not afford to loose the respect of the people who call this area their home or their livelihood.

Correspondence Id: 84 **Comment Id:** 1184028

Comment Text: Another major concern is the well-being and health of the resorts and businesses that serve as a huge benefit, resource, and draw of visitors to the area and park. Many of these resorts rely heavily on winter recreation on the lake. Admittedly, a lot of that is from snowmobilers, but many rely on the ability to provide ice fishing opportunities as well. Restricting the lake to snowmobile access only, outside of the ice roads, cripples an important part of these real people's livelihoods. Again, most of these resorts are nowhere near the ice roads. There is no reasonable way to move ice houses or transport visitors without the use of UTV's, track vehicles or other non-snowmobile type vehicles. Many of these visitors rely on these resorts to set them up for ice fishing and transporting them to and from ice houses. These restrictions would be devastating for area businesses as fewer visitors would come to the area in the winter.

Correspondence Id: 84 **Comment Id:** 1184029

Comment Text: We all rely heavily on the businesses and resorts around these communities to provide a wide range of recreation, lodging, and services. I know as well that they all struggle from year to year to overcome a

litany of other obstacles that press them financially. Most, if not all, are family owned and operated, and they love and care for this area more than most. It would be a travesty and a moral failure to further burden these people who have dedicated their lives to this beautiful place for a restriction that so obviously has no definable benefits, no problem it is solving and has such an enormous cost to these people in particular.

Correspondence Id: 85 Comment Id: 1183623

Comment Text: I am concerned for community businesses to survive, indeed prosper, which affects financial aspects of the community. If icehouses for fishing have to be removed off of the ice daily, many winter businesses would fail because this regulation would be impossible for them to comply.

Correspondence Id: 73 Comment Id: 1183608

Comment Text: If this proposed plan were to be implemented my icehouse rental business would have to fold losing revenue that I would not be able to make up during any other time of the year.

Correspondence Id: 44 Comment Id: 1183520

Comment Text: Let anglers get out and use their UTV to fish on Kab and Rainy. It's more important for Kab to have that as winter businesses pushing for winter fishing tourism are trying to grow.

Concern Statement 56: Commenters expressed concern about limiting ice shelters to within 300 feet of ice roads, noting that the restrictions would be burdensome to ice fishing businesses that typically set up their ice shelters in different locations. Commenters were also concerned that the new ice shelter regulations would reduce business for ice fishing outfitters and impact resorts, restaurants, bait shops, and other tourism-supported businesses.

Correspondence Id: 24 Comment Id: 1182694

Comment Text: it will simply allow a few local residents to operate businesses or enjoy a day of fishing. By restricting use to frozen roads (or within 300 feet) you will essentially stop winter ice fishing business completely and stop locals from enjoying a few warm days of Spring on the ice enjoying the Park, which seems unreasonable and unnecessary.

Correspondence Id: 25 Comment Id: 1183774

Comment Text: The ice fishing outfitters on the west end of Kabetogama typically set up houses within a couple miles of their bases. Forcing them to only place ice houses in a shared area along the park ice road that is many miles from their bases of operation puts an untenable travel burden on outfitters, puts their customers further away if a problem should occur, puts these ice houses in direct competition for space with visitors bringing their own ice houses.

Correspondence Id: 25 Comment Id: 1183776

Comment Text: Requiring ice houses to be only along the ice road would end these businesses, reduce visitor opportunities, and reduce business for resorts that house ice fishing guests, area restaurants and services cater to these guests.

Correspondence Id: 73 Comment Id: 1183606

Comment Text: When I started my business plan years ago no other Angling houses were for rent on Kabetogama. I knew we were not allowed to plow roads, so my plan included the use of light weight aluminum spray foamed fish houses, tracked (American Track Truck Tracks) Jeep, Polaris 6x6, Polaris side by side and a trailer outfitted to transport guests when the ice is not thick enough for the use of my tracked Jeep. I have a substantial amount of time and money invested. This proposal is a direct attack on how I operate. The ice road itself is miles away from where I operate my business and fishing grounds.

Concern Statement 57: Commenters were concerned about property values falling as a result of the plan.

Correspondence Id: 41 Comment Id: 1183518

Comment Text: property values would likely be impacted. These impacts would be felt over all of our Northland communities from Rainy Lake to Kabetogama, Ash River, Crane Lake and more.

Correspondence Id: 54 Comment Id: 1183547

Comment Text: The proposed frozen lake surface access changes would negatively impact businesses in the VNP area as well negatively affecting property owners rights and very possibly the property values in the area.

Correspondence Id: 113 **Comment Id:** 1183899

Comment Text: This plan kills the winter plan excitement, adds not just complication but unreasonable expectations of lake front homeowners and added cost that just are wrong. Most important negative impact of it all is in the lose of home value.

Concern Statement 58: Commenters noted that many people do not own snowmobiles and that the plan would limit access to lower-income people who cannot afford to purchase or maintain a snowmobile. Some commenters expressed more general concerns about the plan being discriminatory against lower-income visitors.

Correspondence Id: 108 **Comment Id:** 1183866

Comment Text: Many persons do not have snowmobiles, and persons with limited incomes can not afford to buy or rent snowmobiles, that is of course, if the Park is for all people, not just the wealthy from the metropolitan areas.

Correspondence Id: 58 **Comment Id:** 1183798

Comment Text: by limiting access to snowmobile use only beyond 300 ft off of the plowed ice road, you are limiting access to the wonderful park that has been set aside for the use of people to those who have access to a snowmobile. These can be expensive and costly to maintain which limits the number of people who own snowmobiles.

Correspondence Id: 106 **Comment Id:** 1184075

Comment Text: What about the people who can't afford to buy a snowmobile? Why can't they access the entire park through a different mode of transportation? This plan targets minorities and low-income people who may not have access to a snowmobile through systematic racism and discrimination against low-income people.

Correspondence Id: 108 **Comment Id:** 1183846

Comment Text: deny the use of the park to most lower and lower middle income persons in the winter for recreational Park use, unless of course, you are from the wealthy privileged class from the metro areas.

Concern Statement 59: Commenters noted that businesses and resort operators use UTVs, ATVs, and vehicles to fix their docks, move equipment, and transport guests. Commenters worried that not being allowed to use these vehicles would hurt these businesses.

Correspondence Id: 122 **Comment Id:** 1183981

Comment Text: It hurts business and resort owners who use equipment on the ice to fix their docks and use Atv's and side by sides to bring their guests out onto the lake.

Correspondence Id: 106 **Comment Id:** 1184078

Comment Text: This plan affects resort owners, many use ATV's, UTV's and vehicles to pull out ice fishing shelters, bring guests and park visitors out ice fishing and to view the scenery, and many resort owners use other equipment such as tractors, excavators, ASV's, bulldozers, etc to work and fix their docks during the winter and springtime. This plan does away with all of this, how is that fair to them who rely on tourism and fisherman to make a living? How is this fair to guests if they can't access all areas of the frozen lakes to fish and sightsee? How will resort owners be able to fix their docks?

Concern Statement 60: One commenter noted that guests often bring their own equipment to resorts and that limits on the types of equipment allowed on the lake could reduce revenues for resorts.

Correspondence Id: 73 **Comment Id:** 1183609

Comment Text: Another problem with the proposed plan is limited guests to operate their own equipment. I have many guests that come to my resort that have their own equipment. If they were no longer able to use that equipment the area would lose out on more revenue.

Table 12. IS4000 – Issues: Private Landowner Access

Concern Statement 61: Commenters stated that potential restrictions on ORV use on the frozen lake would limit private landowners' ability to access their properties and reduce their enjoyment of the park. It would also negatively affect private landowners' ability to maintain their properties because ORVs are the only practical and safe method to transport certain materials. Commenters indicated that the NPS has a responsibility to provide access for private landowners.

Correspondence Id: 9 **Comment Id:** 1182049

Comment Text: I have property on Kabetogama. It is in the name of Duncaonald, LLC, owned by myself and my brother Garth. The property includes two parcels (PN 402-0010-01475 and 402-0010-01145) and basically consists of a lake home, two islands and wetlands totaling approximately 42.3 acres and 3,385 feet of shoreline. It is directly West of Fin Island and North of Peterson Bay. The address is 10085 Gappa Road, but there are no roads to my property and a road or driveway is not an option due to the wetlands that surround my high ground, some wetlands owned by us and some not. The property is only accessible by water in the summer and by ice in the winter. During certain periods during the fall and the spring when the ice is not safe to travel on, it is not accessible. I access my property in the summer by boat and in the winter by an OHV (Polaris Ranger or Yamaha Viking both with tracks) and by snowmobile. It is not practical to use a boat or a snowmobile to transport certain things, including firewood, gravel, building supplies, propane, gas, furniture, appliances, pets, certain handicapped guests, elderly and children, so I use my OHV with tracks during the winter to get this accomplished. Not only would it not be practical or safe to access my property without an OHV in the winter, it is not practical or safe to transport the goods discussed above in the summer by boat. Your proposal to restrict ATV's and OHV's dramatically affects my ability to not only transport people and goods to my property but to safely access my property. I know there are many others adversely affected by your proposal.

Correspondence Id: 14 **Comment Id:** 1182078

Comment Text: The ban of ATV/UTV's in the park is seriously detrimental to folks with property within the park. UTVs are useful beyond recreational purpose, and will limit the ability of those who do own property to maintain it. Please reconsider this bill with respect to those it will affect the most.

Correspondence Id: 17 **Comment Id:** 1182666

Comment Text: I use Voyageurs National Park at a friend's property in the Park and the only way during the winter months is to access it across the ice. We haul a lot of different supplies across the ice during the Winter months for the survival during the summer months, such as fire wood, dirt and numerous other items that are need both during summer and winter months. Please this needs to be reconsidered, and re evaluated.

Correspondence Id: 71 **Comment Id:** 1183598

Comment Text: We own property on Lake Kabetogama and often need to access the property from the ice in the winter to do maintenance and improvements.

Correspondence Id: 98 **Comment Id:** 1183814

Comment Text: I am a 30 year cabin owner on the Canadian side of Rainy Lake and a US citizen. For Winter access I use an RABC and the ROAM app / kiosk. Our Winter access is by snowmobile. On VERY rare occasions we have travelled by other means, primarily 4 wheel drive vehicles from the Rainy Lake Ice Road to the cabin. Primarily to deliver items / building materials not otherwise easily conveyed. Winter ice conditions (ie: Open water in channels) prevent safe access from the Canadian side. I believe this would be prohibited under the proposed rules. Allowing a permitted exception when this is needed would be a good thing. Again, happens rarely, but an outright ban seems unnecessary.

Correspondence Id: 10 **Comment Id:** 1182068

Comment Text: My brother and I own a cabin and property in Peterson Bay which is effectively an island. We can only access our property via Boat in the summer or UTV in the winter. We love going to Kab in the winter to ice fish, ski, etc. If this ban takes place, it will have a massive negative effect on our enjoyment of Kabetogama.

Correspondence Id: 25 **Comment Id:** 1183754

Comment Text: For owners of property adjacent to the park (shoreline owners, private, resort or business), maintaining the ability to access the ice from their doorstep is important.

Correspondence Id: 41 **Comment Id:** 1183517

Comment Text: It will negatively affect shoreline homeowners' ability to access the lake

Correspondence Id: 52 **Comment Id:** 1183542

Comment Text: The park has numerous private property owners that access their properties in the winter months using means that would no longer be permitted. Access over ice has historically been permitted and needs to be insured.

Correspondence Id: 53 **Comment Id:** 1183545

Comment Text: Also home owners on lake would also be negatively effected. Leave well enough alone.

Correspondence Id: 70 **Comment Id:** 1183593

Comment Text: We would not be able to access and enjoy the cabin late fall through spring if we could not use the UTVs to get there due to having no open water for a boat, and unsafe conditions for anything else but an air boat.

Correspondence Id: 70 **Comment Id:** 1183594

Comment Text: I graciously ask you to reconsider your stance on allowing such vehicles on the ice, we are not the only family bringing little ones, or elderly people up there to continue to enjoy the cabin and the beauty of the park, who are unable to safely ride a snow machine.

Correspondence Id: 104 **Comment Id:** 1183832

Comment Text: I own the cabin at 12335 Burma Road on Lake Kabetogama. It's the last cabin at the end of the road. During winter property is not motor vehicle accessible via Burma Rd. Currently the only motor vehicle access is via the frozen lake. The same is true for my neighbors. Hence, I request continued permission for motor vehicle access to my cabin via the frozen lake in the winter.

Correspondence Id: 114 **Comment Id:** 1183906

Comment Text: I do not understand the need to limit access to the lake by the people that do own property on/near the lakes? Again, this seems like more of a power grab/control issue than anything that is fact based causing harm. If you can show me documentation of damage that is being done by this type of access, then I would reconsider my position.

Correspondence Id: 125 **Comment Id:** 1183994

Comment Text: "Walking on water" during the winter season and looking back at my neighbors' shoreline cabins nestled among the pines and rock remains unforgettable. How will restricting winter access points affect shoreline cabin owners? Here, too, conformance is punitive - and unnecessary.

Correspondence Id: 91 **Comment Id:** 1184047

Comment Text: The National Park has a responsibility to provide access to home owners.

Correspondence Id: 118 **Comment Id:** 1183942

Comment Text: Most of the access to the lakes is held by private citizens. They have rights to the lake.

Correspondence Id: 124 **Comment Id:** 1184095

Comment Text: Finally, owners of property riparian to the State's waters, including those within the VNP boundary, have certain "usufructuary" rights that cannot be stripped from them without payment of just compensation by the federal government. Pinney vv. Luce 44 Minn. 367, 46 N.W. 561 (Minn. 1890) and Johnson v. Siefert, 257 N.W. 689 (Minn. 1960). These rights extend across the entire water body and can be exercised by the riparian owner so long as that owner does not interfere with the riparian rights of others or the right to public access. Id. The right to access one's property over the entirety of a frozen public water and to place fish houses is a private right held by individual property owners. This right cannot be abridged by the federal government without a legal taking of that right. The Frozen Lake Plan would strip these owners of their riparian rights without just compensation.

Concern Statement 62: One commenter stated that private landowners who may be affected by the proposed plan should have been formally notified by letter.

Correspondence Id: 118 **Comment Id:** 1183934

Comment Text: It is odd a formal letter was not sent to land owners who border the lake of the proposed changes. On the county Board in which I serve, these proposed changes would rise to the level to require formal notification. We were fortunate to receive a letter about this proposal from a neighboring cabin owner.

Concern Statement 63: Commenters suggested allowing non-snowmobile over-ice access for private landowners and persons with disabilities through a special use permit.

Correspondence Id: 91 **Comment Id:** 1184054

Comment Text: Again, the Park states they have a responsibility to provide access to home owners, and Private land Water locked properties their access would need to be dealt with differently. It was indicated that perhaps they would get a special use permit. Maybe it is a special use permit that one applies for each year to also be able to travel with their truck, ATV, UTV, or other determined vehicle of their choice on the lake surface. Consider charging a fee.

Correspondence Id: 121 **Comment Id:** 1183968

Comment Text: Voyageurs Conservancy would support alternative scenarios that evaluate ORV special use permits for people with disabilities for whom snowmobile travel may not be an option, as well as private property owners directly adjacent to the park who may need to use ATV/UTVs to access their property over frozen lake surfaces or conduct shoreline property maintenance (e.g. docks).

Table 13. IS5000 – Issues: Visitor Experience

Concern Statement 64: Commenters shared that having ORV access to frozen water enhances visitor experience by providing opportunities for touring, ice fishing, snowshoeing, sightseeing, and viewing the northern lights. Some commenters said that they could not enjoy the park in the winter without use of ATVs and UTVs and that the plan would significantly alter their access and enjoyment of the park. Some commenters shared how much they enjoy their current use of the park in the winter and asked that no changes be made to access. Commenters worried that restricting access to smaller areas would increase crowding and limit the dispersed experience they are accustomed to.

Correspondence Id: 2 Comment Id: 1182025

Comment Text: As someone who routinely uses Voyageurs I'd very much like to see atv ohv orv access to frozen waters. More access is always a great thing and in this instance allows for more winter use for touring and ice fishing! I have a sxs with tracks that would allow for great access to fishing and sight seeing with minimal to no environmental impact!

Correspondence Id: 61 Comment Id: 1183805

Comment Text: As a business owner, I have seen multiple guests come to international Falls to visit Voyageurs national park, they have ventured out onto Rainy Lake to ice fish and see the northern lights by driving their vehicles on the designated ice road. Guests have expressed their enjoyment in driving their vehicles onto Rainy Lake to ice, fish and view northern lights, some have driven out there just to experience driving on ice and have proclaimed this as a unique experience.

Correspondence Id: 114 Comment Id: 1183909

Comment Text: Remember that having a pristine park does no one any good if people cannot access the said park.

Correspondence Id: 12 Comment Id: 1182074

Comment Text: I would visit the Voyageurs National Park in the winter and could not enjoy it without the accessibility of an ATV or UHV. Please reconsider your position on the use of ATV's and UTV's in Voyageurs National Park as it would considerably hinder visitors ice access into the park.

Correspondence Id: 72 Comment Id: 1183605

Comment Text: The park should be a sanctuary for people to enjoy the northern Minnesota outdoors in the manner of their choosing. Be it, snowmobiling, skiing, snowshoeing, ice fishing, or otherwise, any non-destructive use of the park should be welcomed and co-exist together.

Correspondence Id: 99 Comment Id: 1183818

Comment Text: I enjoy snowshoeing. If I want to snowshoe along the far shore of Kabetogama, this proposed regulation would only permit me to get to that shoreline by snowmobile or under my own propulsion (which is daunting and probably unsafe at my age). The proposal would effectively PROHIBIT me and others like me from enjoyable access to the Park. I would like to continue to use our side-by-side to safely cross to the far side of the lake so I can snowshoe on the ice surface while enjoying birds, wildlife and scenery along the shoreline. Having the SxS there is also safer in the event I encounter a problem, as I am fully enclosed within a heated vehicle.

Correspondence Id: 122 Comment Id: 1183979

Comment Text: This plan will cause crowding on the lake, people who don't have access to a snowmobile will be forced to crowd into the designated area by the park and won't be able to access the rest of the lake.

Correspondence Id: 68 Comment Id: 1183588

Comment Text: Once again our access to the outdoors is going to be limited!

Correspondence Id: 130 Comment Id: 1184012

Comment Text: What you are doing is trying to end decades of traditions and time spent with family and friends on namakan and lake kabetogama. I have been coming to the lake for over 30 years in early December ice fishing when there is not enough snow for snowmobiles. You will end that tradition.

Correspondence Id: 25 Comment Id: 1183755

Comment Text: If a resort guest is staying miles from an ice road access point, requiring them to trailer and park in a lot, or drive roads at slower speeds with an ORV, to access the ice road will diminish their experience and reduce visitors to the area.

Correspondence Id: 66 **Comment Id:** 1183582

Comment Text: I love the opportunities that Lake Kabetogama has offered my family over my entire lifetime. It truly saddens me to see the proposal which would limit opportunities to the next generations.

Correspondence Id: 122 **Comment Id:** 1183982

Comment Text: This plan hurts fishmen and residents who use ATV's, Side by Sides and vehicles to access the entirety of the lakes, these vehicles cause no more disturbance than a snowmobile.

Correspondence Id: 31 **Comment Id:** 1183432

Comment Text: We cherish the time spent on Sand Point Lake and I really hope we can keep the area for winter rec use the same as it has always been

Correspondence Id: 82 **Comment Id:** 1183618

Comment Text: Also, our 5 grandchildren (another upcoming generation) just love ice fishing and the lake! The side-by-side is a way to get them out on the lake in the winter to fish in our shanty, to enjoy the sledding hill, keeps them warm on the ride and creates a memorable and enjoyable experience for each of them.

Correspondence Id: 106 **Comment Id:** 1184081

Comment Text: It limits access to a park which already has terrible issues with access.

Concern Statement 65: Commenters were in favor of the plan's restrictions on ORVs and ice shelters. Commenters noted the benefits of enjoying time in a quiet environment and explained that their experience is less pleasant when there is noise from adjacent ORV use. A commenter noted that recreational vehicles and large ice shelters could negatively affect activities like cross country skiing and snowshoeing.

Correspondence Id: 18 **Comment Id:** 1182670

Comment Text: There are health benefits to a relaxing quiet environment and exercise, even strenuous activity. These benefits are reduced when there are noisy machines, even if only a small percentage of the machine operators are reckless.

Correspondence Id: 93 **Comment Id:** 1183644

Comment Text: There are many reasons to restrict motorized vehicles even over frozen lakes. It seems that the National Park System has left open access through the most traveled places and that should be enough. This is a pristine area and quiet and limited machine presence is part of the purpose for places like Voyageurs. While sled dogging near this area, I was fortunate enough to avoid snow mobiles and cars as they would have ruined the wild ambience.

Correspondence Id: 111 **Comment Id:** 1183887

Comment Text: Of particular concern are the recent development of vary large ice fishing houses (basically campers) and the negative impact they are having on other large Minnesota lakes. Unfettered access to the Park's lakes by these on-ice recreational vehicles, such as has occurred on these other lakes, would likely have a deleterious effect on other winter recreational activities in the Park, e.g. cross country skiing, snowshoeing, etc.

Concern Statement 66: Commenters were concerned that restricting access for ORVs to ice roads would limit visitors' ability to enjoy fishing and would greatly reduce the area of the lake that is accessible for fishing. Many commenters explained that they like to fish in remote areas to enjoy nature away from crowds. Commenters

noted that the plan would restrict fishing to small, concentrated areas that may not provide the best fishing experience. One commenter was concerned that they would be unable to fish directly from their vehicle in areas with no one else nearby. Commenters noted that if ice roads do not open until mid-January, then the season for ice fishing for game fish would be very short. One commenter explained that period of access for ice fishing is longer when they use ORVs and are not restricted to ice roads.

Correspondence Id: 23 **Comment Id:** 1182686

Comment Text: Restricting use only to a short distance from an "official" NPS ice road will limit public access and enjoyment of ice fishing to only an extremely small percentage of the lake. The vast majority of the lake, including the best areas for fishing, will be off limits to ORVs and most ice shelters under the proposed rules.

Correspondence Id: 112 **Comment Id:** 1183894

Comment Text: If you always must follow a road or fish next to a road, defeats the purpose of being outside enjoying all of nature and VNP.

Correspondence Id: 118 **Comment Id:** 1183943

Comment Text: The plan lacks real world remote fishing/spearing comprehension. In reality people wishing to experience life fishing on a remote lake are not going to show up with large trucks and fish houses in large groups.

Correspondence Id: 47 **Comment Id:** 1183529

Comment Text: This proposal seems geared at reducing access for commercial ice house operations. This seems an unreasonable restriction to winter angling for those who travel distances and would seem to require concentrations along the ice roads which may not be the best sites for angling opportunities.

Correspondence Id: 29 **Comment Id:** 1183424

Comment Text: Please continue to allow off road vehicles on the frozen surfaces of the park. My wife, four sons, and I have enjoyed countless days of enjoyment in the beautiful park by accessing our favorite fishing spots in this manner.

Correspondence Id: 38 **Comment Id:** 1183505

Comment Text: I ice fish directly from the vehicle so that I can stay warm and move frequently while looking for promising areas. I enjoy the park because I can always find an area away from everyone else.

Correspondence Id: 48 **Comment Id:** 1183788

Comment Text: the ice fishing season for game fish in Minnesota begins with early ice and ends at the end of February. A road that does not open until mid to late January leaves an unreasonably short period of time for game fishing.

Correspondence Id: 48 **Comment Id:** 1183789

Comment Text: In contrast, as a fishing enthusiast with a tracked side by side, I currently have ice access generally in late December and, in most seasons, I am able to access the frozen lake surface through March. This represents a significant amount of access from the calendar standpoint and, with the tracked vehicle, access to the frozen lake surface is virtually unrestricted geographically.

Correspondence Id: 59 **Comment Id:** 1183563

Comment Text: The proposed plan would restrict my family and friends' use of the lake such as transportation to and from our favorite fishing holes

Correspondence Id: 25 **Comment Id:** 1183777

Comment Text: In addition, as the ice roads are typically not open until late January (or like this year, early February) while ice fishing typically begins in December and significantly diminishes by February, limiting ice houses to the ice road would further diminish potential visitor use and their experience.

Correspondence Id: 106 **Comment Id:** 1184082

Comment Text: It crowds fishermen into only certain areas of the lake

Concern Statement 67: Commenters noted that ORVs can provide safe access to many visitors, including small children and older visitors. Commenters also indicated that ORVs can be used for access year-round, while snowmobiles are limited to the winter.

Correspondence Id: 25 **Comment Id:** 1183753

Comment Text: "Visitor use and experience, including safety": ORVs can provide a safe method of access and travel for a broader range of park visitors. Many are transitioning to a year-round ORV over a one-season-only snowmobile. Families can travel together and more safely manage small children. They are more comfortable and safer for many senior citizens and people with physical challenges. Accommodating changing visitor preferences should be part of the proposed plan.

Correspondence Id: 91 **Comment Id:** 1184064

Comment Text: It is time for VNP to understand that the need for accessibility to the park requires many modes of travel and adaptability to allow visitors to experience the park and all it has to offer.

Concern Statement 68: Commenters noted that the plan could prevent property owners from creating ice rinks, plowing paths to trails, and maintaining their docks, which would impede safe enjoyment of the park.

Correspondence Id: 25 **Comment Id:** 1183756

Comment Text: Preventing property owners from using ORVs to pack/plow ice rinks, paths to the lake trails or ice trails for their own safe use or that of guests, maintaining/repairing their dock systems, etc. is counterproductive to the safe enjoyment of the park.

Correspondence Id: 25 **Comment Id:** 1183772

Comment Text: Access to the ice has been a tradition among individual property owners and resorts for many generations, long since the area was converted to a national park. Preventing property owners from creating/plowing their own accesses to the lake - connecting to trails, ice road, a fish house, clearing a skating rink - causes a significant negative change to the enjoyment of the lakes throughout the winter.

Concern Statement 69: Commenters were concerned about how the plan would affect visual resources. A commenter noted that concentrations of ice shelters along the proposed ice road on Kabetogama Lake would obstruct views for snowmobilers who are traveling on the trail parallel to the road. They argued that crowded ice shelters would diminish the scenic view for visitors. The commenter was also concerned that the presence of more ice shelters on the road would alter the scenic drive along Kabetogama Ice Road to access Sphunge Island sledding hill and skating area.

Correspondence Id: 25 **Comment Id:** 1183761

Comment Text: The proposed ice road/ice house area on Kabetogama appears to be about 10 miles long and in part parallels the snowmobile trail. Concentrating ice houses in a "parking area" along this route would diminish the view for snowmobilers traveling that route as well as for visitors who want to use the ice road with their (road) vehicles to enjoy unobstructed views.

Correspondence Id: 25 **Comment Id:** 1183765

Comment Text: Concentrating the ice houses also has a negative visual affect on snowmobilers who enjoy riding the trail that currently parallels that area. It would create a concentrated eyesore, rather than a dotting of ice

houses around the lakes. For people wishing to share views of the lake with friends via an ice road - if the road is framed by ice houses, where is the view? You are taking a unique drivable "scenic route" and turning it into a parking lot, a further diminishment of visitor experience.

Correspondence Id: 25 **Comment Id:** 1183778

Comment Text: Lastly, the Kabetogama Ice Road provides access to the Sphunge Island sledding hill and skating area for children. Families would now need to pass through a potential corridor shanty town of ice houses to access this area rather than a scenic drive, diminishing their experience as well. Yet again you are diminishing the enjoyability of the park in winter.

Correspondence Id: 106 **Comment Id:** 1184083

Comment Text: It is bad for the visual qualities of the area and causes crowding.

Concern Statement 70: A commenter was concerned about how the plan might affect soundscapes. The commenter noted that one ORV carrying multiple people would make less noise than several snowmobiles. The commenter also pointed out that concentrating ice shelters in one area would increase noise from generators, which could make the experience less enjoyable and could negatively affect fishing. The commenter suggested regulating ice shelters and vehicle sounds similarly to boats and campsites.

Correspondence Id: 25 **Comment Id:** 1183763

Comment Text: "Soundscapes": A single ORV transporting 2-4 people is quieter than 2-4 snowmobiles traveling together. Regulating ice house and vehicle sound (loud music, etc.) in line with whatever regulations currently exist for boats and campsites would probably make sense. Concentrating ice houses also potentially increases noise in that area because of generators and other equipment; this could negatively impact fishing, and certainly makes for a less enjoyable environment.

Concern Statement 71: Commenters were concerned that the plan would discourage people from visiting the park, enjoying the outdoors in all seasons, and would change unique aspects of the park for visitors.

Correspondence Id: 37 **Comment Id:** 1183501

Comment Text: The park was intended to be a place to enjoy responsibly by all. It seems like the regulations are taking away what makes Voyageurs unique. Instead of inspiring guests to come to the park and see our area we are discouraging potential guests. We encourage the administration to think strongly about the repercussions that would come if a such restrictions were implemented

Correspondence Id: 119 **Comment Id:** 1183948

Comment Text: Voyageurs is a very unique national park. It is very remote and has very few visitors in the winter. Any further restrictions and fees and additional regulations will just make people want to go somewhere else.

Concern Statement 72: Commenters were concerned about how the plan could affect visitor safety. Commenters noted that ATVs and UTVs are useful for emergency response because they can reach their destination quickly and can carry supplies. Some commenters suggested that snowmobiles are more dangerous to visitor safety than ORVs, particularly when there is less snow on the lake surface. One commenter noted that visitors who go onto frozen lake surfaces already take safety precautions and check ice conditions beforehand. They argued that the plan would not improve visitor safety because visitors already take precautions.

Correspondence Id: 66 **Comment Id:** 1183580

Comment Text: If there is an emergency in an ice house, how are the emergency personnel to respond? UTV/ATVs are able to carry extra equipment and supplies for live saving measures.

Correspondence Id: 122 **Comment Id:** 1183985

Comment Text: How will local first responders, Firefighters and EMS personal access the lake for emergency calls?

Correspondence Id: 84 **Comment Id:** 1184031

Comment Text: In addition, using snowmobiles only on the lake can be extremely dangerous at times when there is little or no snow on the lake surface. At these times other vehicles, including UTV's, are much safer.

Correspondence Id: 86 **Comment Id:** 1183629

Comment Text: ATV/UTV are proven to be less of a hazard than snowmobiles, leave less snow tracks than a snowmobile, are quieter and have less emissions than a snowmobile. When was the last time someone was killed going to fast in a track vehicle on a frozen lake?

Correspondence Id: 4 **Comment Id:** 1182035

Comment Text: What practices will be implemented to maintain visitor safety on frozen lakes while also protecting the natural wildlife in the area?

Correspondence Id: 90 **Comment Id:** 1184043

Comment Text: Will the use or activity compromise employee or public safety? When VNP infrequently has much of a frozen surface water area to travel on, the park employees check the ice. Contrary to what VNP may think, individuals have common sense, and check ice conditions also. Living by the VNP visitor center we see time after time those going out with "other" modes of travel checking the ice by using an auger, or chain sawing for thickness.

Correspondence Id: 91 **Comment Id:** 1184053

Comment Text: Safety.....the park is concerned with safety. fPlease, most people do have some common sense, and are not going to locate themselves in a hazardous area on the lake with the intention of having a unplanned event occur.

Correspondence Id: 106 **Comment Id:** 1184076

Comment Text: I am a member of the Volunteer Fire Department in Kabetogama, under this plan we will not be able to respond to accidents out on the lake with our Side by Side. This puts park visitors' health and safety at risk.

Correspondence Id: 106 **Comment Id:** 1184077

Comment Text: As a member of the Department for 5 years I can say that we have been called out for 1 ATV accident, zero UTV accidents and zero vehicle accidents out on the lake. In the same time period, we have responded to at least 10 different snowmobile accidents on the lake if not more. These other modes of transportation are not more dangerous and do not put at risk the health and safety of park visitors compared to snowmobiles.

Correspondence Id: 107 **Comment Id:** 1183840

Comment Text: Also if these vehicles are not allowed it could make it harder to get help for someone in trouble out on the lakes.

Concern Statement 73: One commenter noted that the photos of crowding used in the public meeting presentation were not representative of the winter use experience at the park and felt they were a false representation of current conditions at the park.

Correspondence Id: 118 **Comment Id:** 1183936

Comment Text: The presentations photos are not representative of a Voyagers National Park fishing experience. The photos with the caption "a lake nearby" showing large groups of people fishing using trucks and large fish houses creates a false depiction of the actual fishing experience or set up in the park. Large crowds of people and vehicles fishing has not been my experience on the lakes. The comments about the fish house progressing from home -made to ice castles may have some truth. These large trucks and large wheeled fish houses did not arrive on the lake until the Park Service plowed a road on the lake. With that brought overnight visitors, with lights and noisy generators which can be heard for miles on a calm day.

Concern Statement 74: One commenter asked the park to be cognizant of the visitor experience when locating and designing ice roads.

Correspondence Id: 91 **Comment Id:** 1184059

Comment Text: The location and design of park roads must continue to be in accord with the philosophy that how a person views a park is as significant as what he sees, thereby ensuring that national parks remain places where people go for a unique and rewarding experience.

Table 14. IS6000 – Issues: Enforcement and Staffing

Concern Statement 75: One commenter said that it could be difficult to enforce the proposed changes because it is easy to accidentally stray off path while out in the elements and that negative press pertaining to the park's enforcement department could further hinder enforcement.

Correspondence Id: 112 **Comment Id:** 1183895

Comment Text: The big issue is that it is sometimes easy to go off the correct path if you are out in the elements and Enforcement would be a large concern since the VNP have had negative press from their Enforcement Department in recent history

Concern Statement 76: Commenters provided suggestions related to enforcement. One commenter observed that people ice fishing can leave garbage behind and suggested implementing stricter enforcement of no-littering laws and restricting locations where ice shelters are permitted. Another commenter suggested investing in more individual monitoring of campsites and ice shelters so that one person's behavior does not affect access for all. One commenter asked the park to detail how it would address enforcement under the different alternatives and suggested implementing a monitoring system to track changes in ORV use.

Correspondence Id: 121 **Comment Id:** 1183969

Comment Text: The plan should detail how the park plans to address enforcement in all alternative scenarios. This should include a monitoring system in place to track changes in ORV use over time.

Correspondence Id: 18 **Comment Id:** 1182668

Comment Text: I think there's more that can be done, particularly in enforcement. One example of possible damage that's been in the news lately is that ice fishing villages leave lots of garbage out on the lake, which all sinks into the water at the end of the season. Strict enforcement of litter laws would help with this, along with restricting the allowed locations for these fishing houses.

Correspondence Id: 91 **Comment Id:** 1184051

Comment Text: It was mentioned, by the park personnel, that campsites in the winter are not that popular here, and people are not camping on the ice surface. Monitor the individual and their area of choice for their shelter. If such individual is choosing to litter, or endanger others, deal with the individual. Do not penalize all VNP visitors for the choices of one.

Table 15. IS8000 – Issues: Accessibility

Concern Statement 77: Commenters stated that the proposed plan would disproportionately and adversely affect older park users and those with disabilities who are unable to use snowmobiles to access frozen lake surfaces in the park.

Correspondence Id: 5 Comment Id: 1182099

Comment Text: this will affect once again primarily older people who can then no longer enjoy fishing in permanent shelters that are put in place with pickup trucks, ATV's, SUV's and side by side off road vehicles.

Correspondence Id: 18 Comment Id: 1182671

Comment Text: I am reaching the age where I probably can't go all the places I have been in the past. I still want these places left undisturbed, which means accessible only with difficulty, for younger people and future generations.

Correspondence Id: 22 Comment Id: 1182681

Comment Text: By doing what you propose you will be taking this area away from the older generation who built this country everyone cannot snowmobile or walk to these areas think hard before this happens

Correspondence Id: 25 Comment Id: 1182699

Comment Text: The park needs to be accessible to all visitors, not just those young and fit enough to ride snowmobiles.

Correspondence Id: 25 Comment Id: 1183771

Comment Text: ORVs are becoming more popular because of their multi-season capability. Requiring visitors to only access the lakes with snowmobiles shuts out families that cannot afford to purchase multiple snowmobiles, senior citizens, those with physical limitations that cannot use snowmobiles safely

Correspondence Id: 26 Comment Id: 1183416

Comment Text: My dad and his friends have been fishing the area since 1991 and have always treated the lakes with respect. Most years the transportation of choice has been atvs or utvs. I have been coming to the area with my dad and his friends for 15 years. As the age of this group increases, the ability for them to get out to their 30+ year fishing spots has gotten more difficult. UTVs have made their fishing experience a lot more bearable. Recent years have seen value in more permanent ice shelters for a couple of them.

Correspondence Id: 30 Comment Id: 1183427

Comment Text: The proposal that is in the works really hampers older aged people and people with disabilities.

Correspondence Id: 31 Comment Id: 1183430

Comment Text: every winter we pack all of our fishing gear into our side by side with tracks and head to our favorite fishing spot on Sand Point. We used to make this trek on snow machines but as my father reached 80 years old last year so we bring him to the area the easiest way possible. Learning of the proposal that we would not be able to use the Makooda portage for our tracked side by side really hits home

Correspondence Id: 32 Comment Id: 1183434

Comment Text: Despite personally wanting OHV banned from general access as well, I signed with most the Kab Association for one reason- it would hurt the very few disabled people who actually need to use one of these machines

Correspondence Id: 33 Comment Id: 1183441

Comment Text: Many people have enclosed UTV's which due to limited mobility and health issues allow them to enjoy our area. Please don't take this away.

Correspondence Id: 48 Comment Id: 1183792

Comment Text: As a senior, a heated cab and confidence that I won't get stuck out on the lake makes frozen lake and winter activity in the park much more enjoyable.

Correspondence Id: 52 Comment Id: 1183541

Comment Text: The access to peoples with limitations on their mobility is problematic. The park's accessibility during winter months can be difficult with current conditions. The proposed rule as written would only increase restrictions and dampen accessibility further.

Correspondence Id: 55 Comment Id: 1183551

Comment Text: Why should the fishery only be accessible to people with snowmobiles? I don't own a snowmobile and have a disability so access via pick up truck is important to me.

Correspondence Id: 59 Comment Id: 1183564

Comment Text: For medical reasons snowmobiling is not an option.

Correspondence Id: 61 Comment Id: 1183806

Comment Text: Voyageurs is already the least visited National Park in the Country and guests can not venture out without owning or renting a snowmobile or boat. Elderly guests can not walk, ski, snowshoe or paddle a canoe for any distance.

Correspondence Id: 66 Comment Id: 1183579

Comment Text: The proposal will limit people with disabilities who are not able to travel to the ice houses via snowmobile. Shame on you to limit people with disabilities.

Correspondence Id: 68 Comment Id: 1183589

Comment Text: I am 53 years old with terrible knees. With out this access we have I will not be able to use and enjoy the park like I have in the past. Not everyone can use snowmobiles to get to their fishing spots.

Correspondence Id: 81 Comment Id: 1183612

Comment Text: The Township is in favor of increased park usage and continued support for accessibility for a wide range of individuals and groups. By the Park attempting to put restraints on how Park visitors may use the waterway, rights of individuals who may be handicapped, disabled, or limited to a type of vehicle use for their access to the waterway will directly limit their use and enjoyment of the area

Correspondence Id: 82 Comment Id: 1183617

Comment Text: I (Phyllis) have a disability which affects my legs (pain and numbness) and use a tracked side-by-side vehicle for winter access to enjoy ice fishing anywhere on the lake and to support the various Resorts anywhere on the lake to get food and/or gas.

Correspondence Id: 84 Comment Id: 1184026

Comment Text: My first concern is the limitations the UTV restriction will put on people with limited mobility and disabled people. I know of several residents as well as a very close friend and cabin neighbor of mine, who, other than on a UTV, would not be able to access the lake in the winter. Their abilities don't allow them to use snowmobiles, the only proposed method of access and I imagine many visitors would experience the same limitations. It is not reasonable or sometimes feasible for them to have to travel great distances to access the ice roads which are mainly located in the uninhabited sections of the lake currently and puts undue restrictions on

where and how they access the lake to recreate. My friend would never be able to take his children ice fishing in front of his cabin. In addition, this incumbrance could lead to litigation using the American with Disabilities Act (ADA), that would hold up the implementation of any proposed plan and would incur substantial defense costs to the National Park Service.

Correspondence Id: 86 **Comment Id:** 1183630

Comment Text: VNP is for the people to use. Not to be limited by rules that would eliminate access to those with mobility or may have handicap issues. I'm not sure we need to get involved with Minnesota Disability Organizations over this issue.

Correspondence Id: 88 **Comment Id:** 1184036

Comment Text: Inclusive use for marginalized people i. The proposed FLP also does not consider for future uses and expanding opportunities for people who are less fortunate to enjoy the wintertime magic and splendor of Voyageurs National Park. Snowmobiling alone cannot serve everyone who wishes to enjoy the winter in VNP. Snowmobiling is an expensive, physical, and limiting mode of conveyance. By limiting much of Voyageurs to only be accessed by snowmobile you are cutting off access to people including but not limited to: the physically disabled, the mentally disabled, the socially and economically hindered, and people who do not understand winter travel in a very harsh environment. National Parks and protected lands ought to be open to everyone and much effort, thought, and action ought to be put into expanding use for marginalized people and not restricting it. There ought to be options in the future for responsible CUAs to be considered and issued for vehicles that accommodate marginalized people and opens up responsible access to the frozen lake surfaces.

Correspondence Id: 89 **Comment Id:** 1183641

Comment Text: As I age, it is getting harder to ice fish by snowmobile, my wife has given up snowmobiling a few years ago. I thought that in the future a ORV would be an option for me to continue the sport of ice fishing. The park should be accessible and open to all, as we do not need more restrictions that limit the use of an underutilized park.

Correspondence Id: 91 **Comment Id:** 1184046

Comment Text: In our world of diverse answers to every situation, there should not have to be CONFORMITY to the regulations of the National Park System, which may discriminate against peoples based on age, disability, or other protected classes to access the frozen waters of VNP.

Correspondence Id: 99 **Comment Id:** 1183823

Comment Text: Preventing people like me who do not / cannot snowmobile from enjoying VNP to the fullest extent we can with the methods and equipment we find safe and enjoyable is contrary to the purpose of a national park, and a violation of Minnesota State Law.

Correspondence Id: 106 **Comment Id:** 1184074

Comment Text: This plan restricts disabled people from accessing the entire park, some people cannot drive snowmobiles. Sometimes an ATV, side by side or vehicle is the only mode of transportation for disabled people. My Father is disabled, he can't drive a snowmobile anymore to go fishing. This plan would stop him from being able to access his favorite fishing spots because he needs a Side by Side to get there. This plan is discriminatory towards disabled people.

Correspondence Id: 107 **Comment Id:** 1183839

Comment Text: There are so many alternate methods now to travel on the snow and ice that make it easier for the elderly and disabled to get out and enjoy the park. We should be allowed to use them.

Correspondence Id: 108 **Comment Id:** 1183855

Comment Text: Many persons like myself do not use a snowmobile since I am pushing 82 years

Correspondence Id: 110 **Comment Id:** 1183879

Comment Text: Furthermore, the frozen lake plan appears to disregard the fact that not everyone has a snowmobile as a means of transportation. It fails to consider the physical and mental disabilities, high costs, and visitors who lack the experience or desire to ride snowmobile. The uniqueness of this National Park not having roads throughout eliminates the ability to explore for such people. The exclusionary approach undermines the park's supposed inclusivity towards marginalized groups.

Correspondence Id: 119 **Comment Id:** 1183945

Comment Text: We own a cabin on Ash River and currently just have snowmobiles to get out and enjoy winter but in the future as we get older and less physically able we may want to get a different type vehicle to access the park.

Correspondence Id: 122 **Comment Id:** 1183980

Comment Text: It discriminates and is ableist against disabled people.

Correspondence Id: 123 **Comment Id:** 1183990

Comment Text: The recommended changes would create a hardship, especially for our older population who would need to move the shack every time they'd leave it unattended, not to mention all the separate fishing holes that may be created in doing so.

Correspondence Id: 124 **Comment Id:** 1184094

Comment Text: The DNR also notes that it has an obligation to provide access to the public at large, including an obligation to make these frozen public waters available to persons with disabilities under the Americans with Disabilities Act. Snowmobiles are not an acceptable means of transportation for many people with limited mobility. The Frozen Lake Plan does not appear to allow persons with disabilities alternative vehicles as reasonable accommodations to access the frozen lake surfaces, including remote areas - these accommodations often include cars, trucks, or Class 2 ATVs. DNR is committed to providing equitable access to its lake surfaces, be they open or frozen. The Frozen Lake Plan as proposed does not provide that access.

Correspondence Id: 141 **Comment Id:** 1185040

Comment Text: Stauber said the plan places an undue burden on people with disabilities who will now have even less access to the park.

Concern Statement 78: One commenter stated that the plan should consider options to increase accessibility to frozen lake surfaces in the park.

Correspondence Id: 64 **Comment Id:** 1183576

Comment Text: Instead of making it less accessible think of ideas on how to make it more accessible.

Table 16. AL1000 – New Alternatives or Elements

Concern Statement 79: Commenters proposed several new alternatives or elements for the park to consider. Suggestions included:

- Adding a path around the American side of Harrison Narrows to provide safe travel to central and northern Sand Point Lake.

- Designating a lake as off limits to motorized vehicles and plowing the lake for Nordic ice skating and skiing.
- Creating designated ATV and UTV trail routes and implementing a permitting system to generate funds for trail maintenance.
- Investing more resources on the east end of the park, closer to Sand Point Lake and Crane Lake.
- Allowing special access to the lakes for local residents, resorts, businesses, and their clients.
- Adding an alternative that fully prohibits the use ORVs, and ATVs in the park.
- Implementing a permitting system for staying on the lake in an ice shelter with limited permits available.
- Allowing ORVs to access Mukooda and Sand Point Lakes.
- Allowing ATVs and UTVs to use the portages to access Namakan Lake.
- Giving veterans free access to the park and allowing them to use all types of vehicles.
- Limiting ice shelter weights based on ice conditions.

Correspondence Id: 3 **Comment Id:** 1182027

Comment Text: I would rather see the resources spent on east end of the park closer to Sandpoint & Crane. Seems through the year's most resources go toward the west end and Kabetogama.

Correspondence Id: 25 **Comment Id:** 1182703

Comment Text: The park could designate ATV/UTV trail routes - or corridors along the wide snowmobile trails on the lakes, etc. Snowmobiles are required to have a state sticker which in part funds trails. Having some sort of permitting system (seasonal, 1-day, weekend, one week) could generate funds to help manage ATV/UTV trails or corridors within the park.

Correspondence Id: 28 **Comment Id:** 1183422

Comment Text: For property owners on the Canadian side of Sand Point Lake, the Mukooda Truck portage is a lifeline for hauling heavy items in via winter ice road. For safe travel to central and northern Sand Point Lake land owners must use the American side of Harrison Narrows (the Canadian side is never safe for ORVs). I recommend an allowed path around Harrison Narrows on the American side be added the map.

Correspondence Id: 65 **Comment Id:** 1183578

Comment Text: It would be great to have a frozen lake in Minnesota off limits to motorized vehicles and plowed for wild ice or Nordic Ice skating. We have no safe place to do this now, or very few, and one has to be seen by giant pickups and snowmobiles. If you limit vehicles there, I would love to promote the area for Nordic Ice Skating (or sometimes called Wild Ice skating), and also for skiing.

Correspondence Id: 97 **Comment Id:** 1183811

Comment Text: The park should also consider an alternative in which no ORVs/ATVs are allowed in the park.

Correspondence Id: 103 **Comment Id:** 1183831

Comment Text: In the summer months you need a permit to camp on lake kabetogama , why not have permits to stay on the lake at night in your wheel houses with limited permits available. I think it would help preserve it while being able to enjoy it.

Correspondence Id: 108 **Comment Id:** 1183867

Comment Text: The local people and resorts/businesses and their clients should have special access to the Park (lakes) as we were promised for our support.

Correspondence Id: 91 **Comment Id:** 1184056

Comment Text: Vets may have free access.....you indicate there is a way. Let's certainly hope so. Let's also hope that they will be given access to use the exact type of vehicles, trucks, ATV's, UTV's, or similar to enjoy the waters of VNP. Then, if you are allowing this class of individuals to enjoy the vehicle use, how do you remove this use from other individuals on a non discriminatory basis?

Correspondence Id: 37 **Comment Id:** 1183498

Comment Text: we would like to see the ability to use ORVs to access Mukooda and Sandpoint Lakes as well.

Correspondence Id: 130 **Comment Id:** 1192370

Comment Text: Atvs and Utvs should be able to use the portages to explore namakan.

Correspondence Id: 25 **Comment Id:** 1183782

Comment Text: Is there a need to define where different weight classes of ice house could/should be placed? We think a better solution is to limit these based on ice conditions; something like "No ice house weighing over X can be placed until snowmobile trails and ice roads have at least Y ice thickness. Ice house owner is responsible for ensuring their route and location meet these requirements."

Concern Statement 80: A commenter asked the park to provide more guidance on how human waste should be managed, particularly during long term stays in the park. The commenter noted that the plan could result in a higher density of ice shelters and explained that guidelines for human waste management would be helpful.

Correspondence Id: 101 **Comment Id:** 1183826

Comment Text: please begin to acknowledge the need for guidance as to how human waste needs to be addressed if long term/overnight stays are anticipated. Longer stays for private as well as commercial users lack the guidance necessary to acknowledge this issue, should be addressed earlier rather than later. Consider this guidance with private and commercial use authorization permits being necessary for long term stays. It is already and has been addressed in the Quetico Provincial Parks (headwaters to the park) visitors orientation. A similar beginning will educate the frozen land users that this is and will certainly be a bigger future issue.

Correspondence Id: 101 **Comment Id:** 1183827

Comment Text: Along with prior park approval for Ice Shelters left "longer" (which needs to be defined), guidelines for human waste should be established. It is logical to assume the density of houses will increase. This idea may be helpful for users to better accept the frozen land use plan.

Concern Statement 81: Commenters made suggestions for how the plan should be developed. One commenter asked for the park to establish a paid commission with members from the park, the State of Minnesota, local residents, business representatives, park users, and federal agencies to create a public plan. They suggested that the plan created by the commission should be open for public comment for 6 to 12 months. Another commenter encouraged the park to consider a more proactive adaptive management strategy that would include permitting and capacity restrictions on shelters in the moderate use zone along with plans for monitoring and defining capacities.

Correspondence Id: 121 **Comment Id:** 1183976

Comment Text: The plan should fully address how capacity would be defined and monitored, what metrics would be used, and how NPS would establish and implement a proactive adaptive management strategy within that threshold.

Correspondence Id: 108 **Comment Id:** 1183850

Comment Text: A commission should be set up to discuss the changes, if any, for the use of the Park. If changes are actually needed, a paid committee should be set up to actually develop a public plan with both government Park employee's and the stakeholders that include the State of Minnesota, local residents and businesses representatives, Park recreational users, and the federal agencies that control the navigable waters. Then the

preliminary plan should be open for public comment for six to twelve months, not what is being shoved down our throats by the Park Service and DeGross.

Correspondence Id: 121 **Comment Id:** 1183974

Comment Text: We would encourage the park to evaluate an alternative scenario that includes a more proactive application of those future adaptive management strategies, including permits and capacity restrictions on shelters in the moderate use zone. If this process has taught us anything it is that preventing issues before they occur is easier than changing practices after the fact.

Correspondence Id: 25 **Comment Id:** 1182698

Comment Text: Regulations being proposed and developed must consider traditional use of the area by all, and keep in mind that Voyageurs National Park is not a wilderness area.

Concern Statement 82: One commenter suggested that the park consider special use permits for people with disabilities for whom snowmobile travel may not be an option, as well as private property owners who may need to use ORVs to access or maintain their properties.

Correspondence Id: 121 **Comment Id:** 1183968

Comment Text: Voyageurs Conservancy would support alternative scenarios that evaluate ORV special use permits for people with disabilities for whom snowmobile travel may not be an option, as well as private property owners directly adjacent to the park who may need to use ATV/UTVs to access their property over frozen lake surfaces or conduct shoreline property maintenance (e.g. docks).

Concern Statement 83: One commenter stated that the plan should prohibit outdoor lighting on ice shelters to preserve dark night skies.

Correspondence Id: 6 **Comment Id:** 1182040

Comment Text: Night sky should be protected with no outdoor lighting allowed on ice fishing shacks.

Concern Statement 84: Commenters shared new ideas and suggestions related to ice roads, including:

- Changing where ice roads are located each year to vary the fishing options.
- Allowing ice fishing to continue until mid-April so that people could use the ice road on Kabetogama to access fishing opportunities for a longer window of time.
- Allowing resorts, private citizens, and business owners to plow their own ice roads.
- Hiring residents part time to plow roads to help support the local economy.
- Staking out an unmaintained and unplowed road across each lake for ATVs and utility task vehicles (UTVs) to use and add spurs perpendicular to the road so there are more areas for fishing access.
- Plowing no ice roads.

Correspondence Id: 35 **Comment Id:** 1183450

Comment Text: I think related to vehicles with wheelhouses on the ice that the plowed rd with a 300' to either side may be a good idea with an option to move the ice rds from year to year to have different fishing options available.

Correspondence Id: 48 **Comment Id:** 1183794

Comment Text: You have any number of options other than a plowed road (that won't work most seasons.) For example, you could stake an un-plowed minimum maintenance road that is staked from one end of the lakes to the other. You could still plow some sections to allow access to vehicles that pull wheeled houses, but an unplowed and staked minimum access road would still give you a 'road' for ATV/UTVs. Because they would not leave a berm, they could have spurs perpendicular to the main road in a multitude of places. This would give legal 'road' access to ATV/UTV 's and provide significantly more opportunities for fishing spots...presuming you can still go 300' either side of these minimum maintenance roads and spurs.

Correspondence Id: 108 **Comment Id:** 1183858

Comment Text: Resorts, private persons and business owners could also plow roads to be used to access the lakes, and to the fish houses.

Correspondence Id: 108 **Comment Id:** 1183859

Comment Text: Another words, let the resorts, private businesses and private individuals plow to access the lakes in the Park, at no cost to the government or for the Park.

Correspondence Id: 108 **Comment Id:** 1183860

Comment Text: Also, staff your Park so that the roads could be plowed, maybe hire part time locals to plow roads, instead of out-siders which would help with the local economy during the winter.

Correspondence Id: 30 **Comment Id:** 1193040

Comment Text: So my suggestion is to not do an ice road at all. Let the people use the park "as is"

Concern Statement 85: Commenters provided several suggestions for ice shelter use, including:

- Restricting generator use.
- Limiting time on the ice, similar to backcountry camping.
- Using a permit system to manage volume and determine the location of ice shelters.
- Limiting winter camping to tents or portable ice houses.
- Requiring a seasonal pass for long-term ice shelter placement.

Correspondence Id: 6 **Comment Id:** 1182041

Comment Text: Ice fishing shacks should have no generator use, have temporary use limits like backcountry camping, and be controlled by permits for limiting their numbers and designating their locations.

Correspondence Id: 7 **Comment Id:** 1182045

Comment Text: Winter Camping should be done in tents / portable ice houses.

Correspondence Id: 30 **Comment Id:** 1183426

Comment Text: If you have an ice shelter that people plan on leaving for the year inside the park boundary make a VNP sticker that these people can purchase as a seasonal pass.

Concern Statement 86: One commenter proposed extending the ice fishing season until April 14th to increase usage of the ice road on Kabetogama Lake.

Correspondence Id: 34 **Comment Id:** 1183448

Comment Text: The window for actually using the ice Road on Kabetogama is pretty short. (Late Jan. & Feb.) Once ice fishing closes the usage drops significantly. If Ice fishing were allowed to continue until April 14th. like the rest of the National Park waters, the road may get more usage.

Concern Statement 87: One commenter suggested creating an ice shelter reservation system similar to the summer camping reservation system to control the number of ice shelters and generate more revenue.

Correspondence Id: 1 **Comment Id:** 1181963

Comment Text: perhaps much like the camping reservation system used in summer, a winter wheelhouse reservation system would make it worth the drive. This also could create a system under which there is moderate control of the number of shelters staying on the ice, which also creates a revenue stream for the NPS. Of course, there would be some potential expenses, as many wheelhouse owners might need a plow to clear them a spot. (Another revenue opportunity?)

Concern Statement 88: One commenter proposed following Minnesota's regulations for ice access and implementing a permit use fee for ice houses left overnight and for ATV and UTV use on the ice.

Correspondence Id: 40 **Comment Id:** 1183515

Comment Text: As an alternate to the proposed plan, I recommend using the state of Minnesota regulations for ice use and institute a permit use fee for ice houses left overnight and for ATV/UTV use on the ice. These permits could be annual, weekly, or lifetime. Consider a slight discount for the disabled and seniors. Might generate some much needed funds for maintenance.

Table 17. PN1000 – Purpose and Need

Concern Statement 89: Comments questioned the purpose and need for the project, noting that there were no environmental impacts, crowding, or other concerns prompting the park to take action.

Correspondence Id: 21 **Comment Id:** 1182677

Comment Text: what are the current natural resource impacts right now and possibly in the future? The impacts are not clear

Correspondence Id: 23 **Comment Id:** 1182688

Comment Text: I have never observed any instance in which the use of ORVs and permanent ice fishing houses have had an environmental impact or in fact have even left any trace they have been on the ice following the end of the ice fishing season.

Correspondence Id: 85 **Comment Id:** 1183626

Comment Text: Presently there seems to be very little effect on wildlife with present regulations. In fact, some benefit to wildlife with our groomed trails seems evident, allowing aid to traverse in deep snow conditions.

Correspondence Id: 90 **Comment Id:** 1184041

Comment Text: Will the use or activity disturb or be in conflict with wildlife, vegetation, and environmental protection actions and values? At meetings, there has been no documentation presented that the activity disturbs or is in conflict with wildlife, vegetation, or has created environmental concerns.

Correspondence Id: 112 **Comment Id:** 1183888

Comment Text: what is the environmental detriment that would have the need to create areas that would be off limits during the frozen water season? Science does not have anything to do with conforming to Federal regulations.

Correspondence Id: 16 **Comment Id:** 1182665

Comment Text: I was unable to ascertain the justification for any of the proposed restrictions or fees in the short newsletter release.

Correspondence Id: 34 **Comment Id:** 1183449

Comment Text: Do we really "Need" more rules??? Haven't heard of anyone abusing the current rules. The lake is generally people free. If there are a few people wanting to get out and enjoy the Wilderness. Let them do so.

Correspondence Id: 39 **Comment Id:** 1183514

Comment Text: There is no reason to prevent ATV's (ORV's) from utilizing the frozen lake surface within the park's boundaries. It is understandable to prevent them from accessing the land, but the frozen surface should be free game until issues arise. There is no need to punish law abiding citizens due to some interpretation of the statutes we CAN choose to be liberal on.

Correspondence Id: 52 **Comment Id:** 1183537

Comment Text: The Frozen Lake Surface proposal is aimed to address concerns that are not currently apparent now or in the foreseeable future. The proposed rule will limit access to one of the most under used National

Parks in the park system. Access in the winter months today actually in less than in the open water or summer months.

Correspondence Id: 62 **Comment Id:** 1183568

Comment Text: Our family's comments regarding the Frozen Lake Surface Plan for VNP center around the fact that in all of the literature we've reviewed, there is no mention of the problems that are driving this plan. This topic appears to be a solution in search of a problem. Since no problem(s) can be articulated by the NPS, then we can only assume this plan's real intention is to further limit access to the VNP and surrounding area.

Correspondence Id: 84 **Comment Id:** 1184024

Comment Text: The proposed plan does not have any specific information as to why any of the restrictions are necessary. There are just very vague "Potential Resource Considerations", none of which are current problems and don't take into account the uniqueness of this area. There is no problem or even a single documented complaint noted that this plan will solve. There is no benefit detailed that would improve the lake and surrounding area or the experience of residents, visitors or businesses. It is seemingly just based on potential considerations that are far from the current reality. On the other hand, there are many obvious costs and dire consequences of these restrictions to all that are part of this community and that visit.

Correspondence Id: 89 **Comment Id:** 1183638

Comment Text: I have been snowmobiling and ice fishing in Voyageurs National Park for over 40 years and haven't seen a need for more regulations and, or restrictions. I feel the park is underutilized because of its remoteness, most days when ice fishing I see very few park users and when I do, a good percentage are park or Minnesota DNR employees.

Correspondence Id: 106 **Comment Id:** 1184069

Comment Text: This Federal Rule has been on the books since 1987 but it has never been enforced. People have been using Vehicles, ATV'S and UTV's to access the lakes since before the Park had been established and since 1987 people in the area have continued to do so with no issue....until now. Why is this an issue now?

Correspondence Id: 107 **Comment Id:** 1183842

Comment Text: As I have said, the park in my observations, is underutilized as is and does not need further restrictions/management.

Correspondence Id: 114 **Comment Id:** 1183907

Comment Text: Having read the documentation, I really struggle to see where harm has been documented? Thus, where is the immediate need to implement these changes? Don't get me wrong, I very much want VNP to remain in the condition that it is now and for future generations.

Correspondence Id: 122 **Comment Id:** 1183983

Comment Text: • The Park Superintendent said the Federal law that is in violation has been on the books since 1987, Why are you trying to do something now?

Correspondence Id: 126 **Comment Id:** 1183997

Comment Text: From the information available, this is a draconian solution in search of a problem. It would appear the NPS has decided to develop this plan simply because it did not have a frozen surface use plan. Simply put, no justification whatsoever has been presented that would justify restricting the use of these frozen lakes in the manner proposed by this plan. If the fishery was being depleted due to over harvesting, or there were many incidents of ATVs falling through the ice, getting stuck, getting lost, or otherwise getting into trouble which required search and rescue assistance, then such a draconian plan might begin to make some sense. In the absence of such indications for stringent restrictions, this plan makes no sense whatsoever.

Correspondence Id: 130 **Comment Id:** 1184009

Comment Text: I am disappointed by the firestorm you have started. You are trying to define a regulation for a problem that does not exist.

Concern Statement 90: Commenters felt that the park is unique with non-traditional access requirements, including residential development within the park. As a result, they noted that regulations governing park use should be tailored to the specific park conditions. One commenter noted traveling on ice using a variety of vehicles is a traditional park use, is a precedent in this park, and is not incompatible with the park setting.

Correspondence Id: 25 **Comment Id:** 1182695

Comment Text: Voyageurs National Park is in many ways unique among our National Parks. To the best of our knowledge, it is the only park with residential and commercial development that has direct access to the park (i.e., access to the lakes within the park). Depriving businesses and property owners of accesses they have traditionally had under the umbrella of "alignment with regulations at other national parks" becomes less appropriate. Many national parks have unique regulations that align with a park's unique character. That is what is needed here at Voyageurs.

Correspondence Id: 30 **Comment Id:** 1183428

Comment Text: National parks were designed to allow people to use and enjoy them. Times have changed, technology has changed. It's time for the park to adapt to the new way of life. These rules were written over 40 years ago and your trying to make a one size fits all rule system that doesn't fit this unique area.

Correspondence Id: 71 **Comment Id:** 1183601

Comment Text: Voyageurs National Park is unique in the National Park system. There is no reason to have the same rules and regulations in each park when they represent very different experiences.

Correspondence Id: 85 **Comment Id:** 1183622

Comment Text: Voyageurs National Park is unique, unlike any other, therefore wanting to bring it into "compliance" with other national parks is ridiculous. Rather, a consideration of regulations governing VNP should also be unique to this park, this area only. The idea that "ice" or "frozen water" could be considered "land" is also ridiculous by scientific definition.

Correspondence Id: 90 **Comment Id:** 1184042

Comment Text: Will the use or activity conflict with or be incompatible with traditional park uses and activities? VNP has operated with the various methods of travel being discussed/outlined in the proposal for the Frozen Water Access Plan for the past 35 to 45 years. This seems to indicate these traditional park uses and activities have a precedent in VNP and are not incompatible to the park uses and activities.

Correspondence Id: 112 **Comment Id:** 1183893

Comment Text: The park has unique aspects that other National Parks do not and plus it has public water that is out of the park that will not be conforming to this plan. The idea that developing regulations and increasing restrictions need to have a purpose that will help the environment. The proposed frozen lake surface access and use plan is cause for concern since it was developed and used for an entirely different situation than what is proposed here in VNP.

Concern Statement 91: Commenters noted the purpose of the park is for the enjoyment of the public and indicated that this plan is not in line with that purpose and would restrict access.

Correspondence Id: 58 **Comment Id:** 1183800

Comment Text: Per the NPS website, National Parks were designed as "a public park or pleasuring-ground for the benefit and enjoyment of the people" which should include all people, not just those with access to certain types of transportation.

Correspondence Id: 96 **Comment Id:** 1183740

Comment Text: If the purpose of a "park" is to get people out of their homes and enjoy their surroundings more, I question if this plan will accomplish that or quite the opposite.

Table 18. CC1000 – Consultation and Coordination

Concern Statement 92: Commenters asked the park to coordinate and solicit input from the following groups:

- Local landowners
- Resort and business operators
- Park visitors
- Community organizations
- County officials
- State officials
- Tribal government
- Local government

One commenter asked the park to schedule a joint meeting with stakeholders during July or August to reach a more collaborative decision. Commenters specifically asked for more coordination to occur with the Minnesota Department of Natural Resources.

Correspondence Id: 39 **Comment Id:** 1183512

Comment Text: If I had my way, I would ask this “core planning team” to go back to the drawing board and engage the State of Minnesota and other local agencies whose interests are tied up with a proposed plan like this. We have to get away from a one-size-fits-all mentality.

Correspondence Id: 84 **Comment Id:** 1184033

Comment Text: The local community, and the State of Minnesota should have been involved at the very beginning of the development of any plan affecting these waters. As noted above, the NPS does not have the authority to implement any restrictions or regulations without the express approval of the state. There is no humility in changing course when faced with good reason and a community outpouring, only respect and dignity.

Correspondence Id: 96 **Comment Id:** 1183741

Comment Text: I would have to encourage you to consult and listen to the local DNR comments on this.

Correspondence Id: 117 **Comment Id:** 1183931

Comment Text: it is imperative I stress that there be no additional restricted access to VNP. To arrive at concurrent jurisdiction a decision must reflect the needs of all involved: local land owners, resort and business operators, visitors, community organizations, county officials, DNR officials, State officials, and the NPS. This joint meeting must be held in July or August to allow attendance by all the above-mentioned parties, who would not be available during other months. There must be a concerted effort by all parties involved that reflects community participation.

Correspondence Id: 118 **Comment Id:** 1183933

Comment Text: The draft plan cites two parties, The Park Service and Visitors. In reality two other parties are not represented, the State of Minnesota and land owners who own property that connects to the water. The water is available to use with license issued by the State of Minnesota. These two parties need to be part of the discussions.

Correspondence Id: 124 **Comment Id:** 1184086

Comment Text: I want to convey our surprise and disappointment with VNP's decision to come forward with such a sweeping proposal without prior consultation with the DNR, riparian property owners, and the general public. There is a long history of cooperative management and active public use of the State's public waters within the boundaries of the VNP. We would have hoped and expected to have conversations about the NPS's management objectives and an opportunity to explore potential approaches to addressing those objectives. Instead, we were presented with a specific proposal that seeks to impose significant restrictions on longstanding winter uses of the State's public waters within the park.

Correspondence Id: 124 **Comment Id:** 1184087

Comment Text: Despite our significant concerns with the Frozen Lake Plan as presented, I also want to emphasize that the DNR is fully prepared to participate in more inclusive NPS process that engages all relevant parties, including local and tribal governments, business owners, community members, private landowners, and other park users.

Table 19. PI1000 – Public Involvement

Concern Statement 93: Commenters expressed frustration with the level and timing of stakeholder engagement, noting the public meetings did not provide opportunities for input, and attendees were generally not in support of the proposal. Commenters requested transparency in the process moving forward as well as the opportunity for part-time residents to attend meetings in the summer. Commenters requested additional public engagement efforts with local stakeholders, specifically requesting additional opportunities for input on the proposed plan and potential alternatives, as well as an opportunity to understand what comments were received and any changes to the proposed plan as a result.

Correspondence Id: 35 **Comment Id:** 1183453

Comment Text: Another thought i have is once the park takes in all this public comment it would be nice to have another round of meetings to hear what the park got for comments. what where the most common things they had to say and some numbers on how many people submitted comments. after that the park could make changes to their proposed plan if they decide to and have another round of meetings and public comment for the people.

Correspondence Id: 39 **Comment Id:** 1183509

Comment Text: I recently attended the public forum regarding the proposed Frozen Lake Surface Access and Use Plan within Voyageurs National Park. During the public comment session I asked very specifically whether or not public comment ACTUALLY had the chance of swaying the direction of the proposed plan. I asked if this was a genuine approach to obtaining the public's wants, needs and opinions. I was told that it was genuine. My experience has taught me that if that were true- -- -this comment period would have occurred BEFORE the plan proposal was made public. However, as I was publicly assured this was a genuine fact and opinion finding mission, I will have to accept that as the case.

Correspondence Id: 67 **Comment Id:** 1183586

Comment Text: I did refer to the 2 hour meeting in Kabetogama as a JOKE, except that a joke is generally funny or humorous. This was a disaster at the least. There were more than 100 people in attendance and I do not think one person thought this was a plan with potential to find common use.

Correspondence Id: 84 **Comment Id:** 1184032

Comment Text: Finally, many of the property owners on Lake Kabetogama do not live here over the winter and have found it overly restrictive to attend the in-person comment meeting in April. I feel that for a true quorum to be heard, and for all of those who wish to comment in person, additional meetings should be held during the summer months.

Correspondence Id: 108 **Comment Id:** 1183849

Comment Text: We like open government with transparency, not a secret plan that was going to be jammed through without input from the public, especially from those persons who live near the Park, on the lakes and the local businesses and resorts.

Correspondence Id: 108 **Comment Id:** 1183863

Comment Text: The Park is Minnesota water, not federal Park Service water and Minnesota residents and their guests must have input as to how the water, including frozen water is used.

Correspondence Id: 108 **Comment Id:** 1183868

Comment Text: With a real planning committee, a real plan for the use of the Park could be developed with meaningful community input, not some secret plan to be shoved down our throats by DeGross and the Park Service.

Correspondence Id: 113 **Comment Id:** 1183902

Comment Text: If you do not side with my interpretation of the law, then at least listen to the people that this plan affects most.... The businesses, home owners, etc. They will tell you no, this plan is not right. It has worked for how many years why change.

Correspondence Id: 114 **Comment Id:** 1183903

Comment Text: How does a person tactfully say that the public comment section/period appeared to be an afterthought? It appears that a plan was already decided upon before the public meetings took place. It also appears that there was no intent to actually listen and incorporate any of the people's concerns that attended the public meetings. This is evidenced in the fact that the public comment period was initially SO short! While the comment period was extended, I am not convinced that these comments will be heard and considered.

Correspondence Id: 114 **Comment Id:** 1183908

Comment Text: I implore you to listen to ALL sides of the issue, weigh the facts and consider the impact on everyone along with the park before making a final decision

Correspondence Id: 116 **Comment Id:** 1183913

Comment Text: We support establishing a winter plan developed with community input that aligns traditional uses with the applicable regulations.

Correspondence Id: 116 **Comment Id:** 1183915

Comment Text: NPS should consider ways to expand its community engagement as the planning process moves forward so that it is clear community input is valued. The next version of the plan must include multiple alternatives for consideration by the community.

Correspondence Id: 118 **Comment Id:** 1183935

Comment Text: An attempt was made to secure a video of the public hearing which was not available, only a copy of the power point presentation. The public hearings are recorded for the public to view on the county board I serve on.

Correspondence Id: 120 **Comment Id:** 1183954

Comment Text: Trust has been obliterated between federal law enforcement and the local community. Flexing muscles right now just reinforces that lack of trust.

Correspondence Id: 121 **Comment Id:** 1183955

Comment Text: The NPS proposed Frozen Lake Surface Access and Use Plan will be one of the most substantive proposals for how Voyageurs National Park will be managed and used since the 2002 General Management Plan. However, the park did not solicit any public input when developing the current preliminary proposal. Instead, it relied on this public comment period and the ensuing National Environmental Policy Act (NEPA) process as the primary means of public engagement on these issues. While we acknowledge NEPA's strong requirements for "diligent" public involvement, we believe a lack of early stakeholder engagement contributed to the draft plan being largely met with surprise, confusion, and frustration by a diverse range of park stakeholders. As the party responsible for integrating the NEPA process into all regional activities, we encourage Regional Director Frost to take all steps possible to ensure a robust public involvement process moving forward.

Correspondence Id: 137 **Comment Id:** 1185032

Comment Text: The timing of this issue, length of comment period and lack of communication with the gateway communities is unacceptable and terrifying. In fact, Crane Lake was never contacted or even consulted with directly about this access plan.

Correspondence Id: 139 **Comment Id:** 1185036

Comment Text: Our organization is also concerned that a proposed plan such as this seems to be rushed and pushed upon-gateway communities who do not support these proposed access restrictions.

Correspondence Id: 108 **Comment Id:** 1183847

Comment Text: I am also aware of the lack of true consultation when the government decides to do something, using a few persons to rubber stamp their plans which is not real community input or consultation.

Correspondence Id: 115 **Comment Id:** 1183911

Comment Text: This has an odor to it, local gateway communities were not consulted appropriately.

Correspondence Id: 116 **Comment Id:** 1183914

Comment Text: NPS has indicated we are at a "civic engagement" period of the planning process and that the forthcoming National Environmental Policy Act (NEPA) process will result in refined preliminary alternatives for public input. However, NPS did already release one initial alternative for public comment, which has resulted in some negative feedback about the plan. An early dialogue with the community before an alternative was developed may have been met more openly and resulted in alternatives that were supported at the outset.

Correspondence Id: 116 **Comment Id:** 1183918

Comment Text: In the next phases of planning, NPS should clearly define what the resource impacts are so that it is clear what the plan is trying to address. This will help the public understand the need for the plan and help tailor proposed alternatives for public input.

Table 20. ON1000 – Other Data Needs

Concern Statement 94: Commenters asked the park to conduct studies or research to justify and inform management decisions. Commenters asked the park to investigate the following topics related to the plan:

- Effects of wintertime frozen lake use on the environment in the summer.
- Effectiveness of safety measures.
- Impacts of bigger ice shelters and ORVs on the park.
- The park's visitor capacity.
- The amount and impacts of littering, black water discharge, and fish depletion at Rainy Lake and Kabetogama Lake.

One commenter noted that the park conducted a study and solicited stakeholder input prior to implementing the park's campsite reservation system and suggested following similar steps to create a balance between protecting the "wild character" of the park while encouraging visitors to ice fish without damaging resources.

Correspondence Id: 4 **Comment Id:** 1182039

Comment Text: If not done already, I think related research that could be useful for this proposal is the effects of safety measures to protect park visitors, and maybe some research to consider doing is the effects of wintertime frozen lake use on the summertime environment.

Correspondence Id: 31 **Comment Id:** 1183433

Comment Text: I would like to see the study on how the bigger fish houses and ORV's have negatively impacted the area.

Correspondence Id: 116 **Comment Id:** 1183920

Comment Text: NPS may also want to consider completing a study to determine capacity limitations much like it did prior to implementing its campsite reservation system. A similar process here could be used to show how

the plan is designed to address the specific resource challenges while also allowing for traditional ice fishing activities.

Correspondence Id: 121 **Comment Id:** 1183977

Comment Text: A study could be done to support monitoring and assess capacity at Rainy Lake and Kabetogama on human impacts like litter, black water discharge, and fish depletion. Prior to implementing VNP's campsite reservation system, stakeholder input and a study were completed to determine capacity of each campsite, maintenance of the campsites, and park capacity during the summer months. A similar process could be used to show how management practices and visitor use guidelines will keep the wild character of the park while also welcoming ice fishing without damaging our waters and our fish population.

Table 21. FR1000 – Federal Regulations – ORV Use on NPS Lands

Concern Statement 95: Commenters stated that current NPS regulations regarding the use of ORVs on NPS lands should be upheld and enforced without modification.

Correspondence Id: 6 **Comment Id:** 1182043

Comment Text: The NPS regulations should be followed right away, with no need for additional planning or public comments before implementing them. The 1983 Wilderness Recommendations should be followed. The NPS Management Policies and Wilderness guidelines call for managing Recommended Wilderness the same as Designated Wilderness while awaiting the Congress to act on the Recommendation.

Correspondence Id: 94 **Comment Id:** 1183645

Comment Text: Legacy issues of access and tenure are notoriously difficult to manage into compliance with standards; everyone believes their local public land area is Special and should be managed differently. Please continue forward with managing for compliance with Federal policy and regulations. The current users will adjust to the new reality.

Concern Statement 96: Commenters stated that the park should be exempt from federal regulations that prohibit off-road use of vehicles in national parks. Commenters stated that federal regulations should be modified to allow the use of ORVs on frozen lakes in the park based on the park's unique features and history of ORV use on frozen lakes.

Correspondence Id: 48 **Comment Id:** 1183795

Comment Text: Another option...and I think the best option...is to use park resources to get a park wide exemption in Voyageurs National Park that allows tracked ATV/UTV's on frozen lake surfaces. This would be far better than using the parks resources to fight the State of MN over water rights, not to mention the national and local UTV/ATV organizations and clubs. I don't believe getting an exemption for Voyageurs National Park would be near as difficult as perhaps it once was. Congress has directed the Secretary of the Interior to work with gateway communities (like Kabetogama and International Falls) to partner in programs to expand access while protecting the resource for future generations. Fighting long drawn-out court battles that the NPS is likely on the wrong side of, wastes time, money, and creates unnecessary distrust in the leadership of the national park systems.

Correspondence Id: 56 **Comment Id:** 1183552

Comment Text: There should not be any alteration to the current regulations/ laws for the way locals and tourists visit and use VNP. Every national park in the United States is unique in their own ways, just because other parks implemented rules against Atv's, UTV's etc. does not mean this park should follow suit.

Correspondence Id: 48 **Comment Id:** 1183793

Comment Text: There are times when there is not enough snow for snowmobiling, but plenty of ice for fishing. My UTV solves this issue and provides a safe and comfortable environment for moving around the lake surface. The point is, these vehicles are more prevalent than snowmobiles for many reasons, and making provision for them, makes provision for additional access winter access to the American public.

Correspondence Id: 61 **Comment Id:** 1183804

Comment Text: If the park service is inclined to be in compliance with other national parks and their rules, it is up to our national park in Minnesota to object and write bylaws that allow other vehicles .

Correspondence Id: 99 **Comment Id:** 1183822

Comment Text: This National Park, with its unique history that includes current individual, business and state shoreland property owners all sharing riparian rights and duties with VNP, needs to have the governing law by Minnesota and the riparian rights and duties that come with that jurisdiction codified within 36 CFR 7.33. The case that no other National Park permits ORVs is immaterial. This park is unique. The use of ORVs and ice houses of any sort on the major waters within VNP should run with the laws of the State of Minnesota that have jurisdiction over those waters

Correspondence Id: 107 **Comment Id:** 1183841

Comment Text: And as a unique mainly water access park, if there are NPS regulations/rules about the frozen roads, work to change the regulations/rules to reflect the past and current uses of the frozen lakes.

Correspondence Id: 110 **Comment Id:** 1183883

Comment Text: Considering that Voyageurs National Park is a unique water-based national park, the Rainy Lake CVB suggests that the current deficiencies in the Code of Federal Regulations (CFRs) be addressed by modifying or adding specific regulations tailored to Voyageurs National Park. These CFRs should account for any long-term changes in park usage and be considerate of its distinct characteristics.

Correspondence Id: 119 **Comment Id:** 1183946

Comment Text: From my observations in the past there are very few park users in the winter so why change the way it is currently used? Apparently there is a NPS regulation concerning road use that could and should be changed to accommodate and make legal the current vehicle uses on the frozen surfaces in the park.

Correspondence Id: 125 **Comment Id:** 1183992

Comment Text: You truly have a unique opportunity to set yourself apart by utilizing Federal regulation (36 CFR 57.33) as a building bridge for a more prosperous, common sense, balanced future for VNP, resorts, businesses, tourists, local communities and cabin owners.

Correspondence Id: 134 **Comment Id:** 1185023

Comment Text: The law needs to be changed; it is old and outdated. This WATER BASED park should be JUST THAT!! We should not have the same rules as non-water based parks.

Correspondence Id: 88 **Comment Id:** 1184039

Comment Text: My recommendation for moving forward to address the current deficiencies in the CFRs and non compliance of them would be to modify, re-write, or add to the current CFRs that are in place. These CRF's should be specific to the very unique considerations, historic uses, and environment of Voyageurs National Park now and into the foreseeable future. This should be done by many public meetings engaging all stake holders, gateway communities, state and local officials, federal agencies, and legal teams to write CFRs that make current use in Voyageurs compliant. These new CFRs ought to be VNP specific and address long term changes in possible useable and long term changes to the climate. Although the agency may see changes to the CFRs, and making "park specific" CFRs a slippery slope, I do not believe this to be the case. It can be easily argued that Voyageurs is quite unique in the National Park system and that by addressing the very unique conveyances of Voyageurs during the winter months is the responsible, honest, and prudent way to solve the problem that lies before us.

Correspondence Id: 25 **Comment Id:** 1183747

Comment Text: Depriving businesses and property owners of accesses they have traditionally had under the umbrella of "alignment with regulations at other national parks" becomes less appropriate. Many national parks have unique regulations that align with a park's unique character. That is what is needed here at Voyageurs.

Concern Statement 97: Commenters indicated that they disagree with the park's interpretation of federal regulations that consider ice to be an extension of land.

Correspondence Id: 99 **Comment Id:** 1183819

Comment Text: Superintendent DeGross said that VNP considers frozen waters to be land. Nowhere in 36CFR (or elsewhere in any NPS documentation I could find) are "frozen waters" defined as anything other than water that is frozen. This is an unreasonable attempt to seasonally change jurisdiction of those waters.

Correspondence Id: 106 **Comment Id:** 1184079

Comment Text: At the in-person meeting in Kabetogama the park superintendent said that the park considers ice to be a continuation of land. How can this be? The definition of ice is noun- frozen water, a state of coldness. The definition of land is noun- the surface of the earth that is not covered by water. These are two completely different things, and the park does not own the water in Lake Kabetogama, Namakan, Rainy, Sand Point or Crane. Water is not land, open a dictionary please!

Correspondence Id: 114 **Comment Id:** 1183905

Comment Text: Another concern I have is that the VNP representative stated that ice is considered ground, not water. While I do not have a degree in physics or chemistry, I can say with certainty that water and ice are the same chemical makeup! They are just in a different state of matter. What is the purpose for this distinction...could it be for a legal purpose? Is it again an end run to gain more power/control? If it is not, then you have done a poor job in convincing the people that attended the public meetings that this is not an attempt to gain more power/control.

Correspondence Id: 124 **Comment Id:** 1184090

Comment Text: The Frozen Lake Plan's treatment of the State's public waters, when frozen, as a land mass and applying regulations to the frozen surface as if they are a land mass is contrary to law. VNP cites as its authority to regulate access to and across the surface of the State's frozen public waters 36 CFR § 4.10, which governs the travel on park roads. The argument advanced by VNP to apply this regulation and restrict access to frozen lake surfaces is based on its mistaken belief that when a public water freezes it ceases to be a water body and is, rather a continuation of the land. This rationale is inconsistent with applicable water law.

Correspondence Id: 127 **Comment Id:** 1184000

Comment Text: I also believe, as a long-time resident of the park, that at no time should water be considered land

Correspondence Id: 128 **Comment Id:** 1184002

Comment Text: The whole argument of a frozen surface being land is just intended to enable governing overreach. We can't allow a redefinition of water, ice, and land just to meet certain needs, wants and desires.

Correspondence Id: 129 **Comment Id:** 1184007

Comment Text: FROZEN WATER IS NOT LAND, even if it was the Park Service would have any jurisdiction when the water is not frozen.

Concern Statement 98: One commenter stated that frozen lake surfaces do not meet the NPS definition of roads.

Correspondence Id: 131 **Comment Id:** 1184018

Comment Text: The ice should not be considered a road(s) in the sense of applying national park road requirements to it.

Concern Statement 99: A commenter asked the park to consider whether ice roads meet the definition of a road and to prohibit ORVs and ATVs from using ice roads if they are considered roads.

Correspondence Id: 97 **Comment Id:** 1183813

Comment Text: The park should also consider whether an ice road meets the definition of a road; if it meets the definition then ORVs/ATVs would not be allowed on the road.

Table 22. SR1000 – Minnesota State Regulations

Concern Statement 100: Commenters stated the State of Minnesota has jurisdiction of waters within the park, including frozen lake surfaces. As a result, commenters indicated that Minnesota regulations should apply.

Correspondence Id: 26 **Comment Id:** 1183418

Comment Text: I feel the water should fall under the DNR and their already established rules allowing all modes of transportation.

Correspondence Id: 35 **Comment Id:** 1183452

Comment Text: I also noticed that DNR was there and it didn't seem there was a precise answer on who actually controls the water in the park being it was never deeded to park? Maybe this isn't a park issue and we can work with the state on a plan.

Correspondence Id: 44 **Comment Id:** 1183521

Comment Text: ice doesn't matter when it comes to differentiating access by state statute.

Correspondence Id: 45 **Comment Id:** 1183527

Comment Text: The plan as proposed violates the riparian rights of private and public lakeshore owners. The use of the frozen lake surface to recreate is protected by the riparian rights endowed by the State of MN (see: [Sanborn v. People's Ice Co. \(PDF\)](#); 82 Minn 43, 84 NW 641 [1900] and [Lamprey v. State \(PDF\)](#), 52 Minn 181, 53 NW 1139 [1883]). The riparian owner has the right to make use of the lake over its entire surface (see: [Johnson v. Seifert \(PDF\)](#); 257 Minn 159, 100 NW 2d 689 [1960]). The waters of Voyageurs National Park are under the state's jurisdiction. The state never ceded the waters to Voyageurs National Park.

Correspondence Id: 55 **Comment Id:** 1183549

Comment Text: My fishing license gives me the right to fish where I want and I agree with the DNR, you don't have authority to regulate what happens on the water.

Correspondence Id: 59 **Comment Id:** 1183562

Comment Text: We understand Minnesota statute 84B.061, support it and believe it should remain in effect. We also support the DNR's position that "water is water, and they retain the water rights."

Correspondence Id: 71 **Comment Id:** 1183597

Comment Text: The waters inside of Voyageurs National Park were never ceded by the State of Minnesota so for the Park Service to want to place restrictions on our use and enjoyment during the winter months makes no sense. And to state that once the water is frozen, it becomes "land" and therefore is under the jurisdiction of the Park Service is absurd.

Correspondence Id: 59 **Comment Id:** 1183562

Comment Text: We understand Minnesota statute 84B.061, support it and believe it should remain in effect. We also support the DNR's position that "water is water, and they retain the water rights."

Correspondence Id: 71 **Comment Id:** 1183597

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sense. And to state that once the water is frozen, it becomes "land" and therefore is under the jurisdiction of the Park Service is absurd.

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Correspondence Id: 106 **Comment Id:** 1184067

Comment Text: The Park will violate its own Federal Code by imposing this plan, The use of vehicles within a park area are governed by State Law! ATV and OHV travel is allowed on Frozen Minnesota Lakes. The NPS is violating state law by implementing this plan. 2) Title 36-Part 4-4.2 (a) Unless specifically addressed by regulations in this chapter, traffic and the use of vehicles within a park area are governed by State law. State law that is now or may later be in effect is adopted and made a part of the regulations in this part. (b) Violating a provision of State law is prohibited.

Correspondence Id: 106 **Comment Id:** 1184068

Comment Text: The Park Superintendent has the ability to avoid this Frozen Lakes Plan by simply designating that ATV's OHV's and Vehicles can drive on frozen lake surfaces, the park does not own the water and Frozen water is Not Land! This again is a State issue.

Correspondence Id: 106 **Comment Id:** 1184085

Comment Text: Please scrap this plan, no restrictions on lake access, visitors to the area should only have to follow State Laws. Lastly, and this is the biggest issue, this plan violates Minnesota State Law 84B.061. The Federal Government has no right to impose rules and regulations on Minnesota Lakes. Ice is Water and NOT Land!

Correspondence Id: 108 **Comment Id:** 1183848

Comment Text: First- The state of Minnesota has not given up its water rights in the Park area. The Park water area, meaning it's lakes, connecting lakes, rivers and creeks are navigable waters, and as such, the water use comes under the Statute Section 404 of the Clean Water Act, Section 10 of the Rivers and Harbors Act of 1899 and the Navigable Water Protection Rule that took effect on March 20, 2023, along with Minnesota state regulations. None of these statutes and regulations describe ice on the water as land as DeGross does, it is still solid water, H2O. Minnesota has not given up their water rights in the area, so what DeGross is proposing must also have the approval and input from the State of Minnesota legislature, which is very unlikely, and the other federal agencies that control the water use.

Correspondence Id: 108 **Comment Id:** 1183857

Comment Text: A common sense proposal would be to use the state guidelines for removal of the fish houses and their dates for removal, since they have not given up their water rights

Correspondence Id: 109 **Comment Id:** 1183873

Comment Text: I can see no good reason for your proposed regulations limiting use of other means of transportation other than snowmobiles on the frozen WATER that the state of Minnesota has not given up the rights to per Minnesota Statutes 84B.061.

Correspondence Id: 112 **Comment Id:** 1183891

Comment Text: I also disagree with the definition that all frozen waters are considered land, that definition by 36 CFR & 4.10 which make ice roads NPS Class IV. The definition is also a reach since it is governed by the State of MN. The present day status is sufficient to me since I am not aware of an actual problem.

Correspondence Id: 113 **Comment Id:** 1183897

Comment Text: our proposal is outside of the jurisdiction and authority of the VNP. Mr. DeGross is wrong in his evaluation that frozen waters are land. Minnesota statute 84B.061 states "These navigable waters include the following: Rainy, Namakan, Sand Point, and Crane Lakes. Pursuant to the applicable federal and state law, navigable waters and their beds are owned by the state. Ownership of and jurisdiction over these waters and their beds has not been ceded by the state, either expressly or implicitly, to the United States." Per the statute I will be asking our State government, Senators and other, to defend these rights, as the statute states they should. The DNR disagrees with this plan as well.

Correspondence Id: 113 **Comment Id:** 1183900

Comment Text: This plan is unlawful and not within the VNP's jurisdiction, and it should end right there.

Correspondence Id: 116 **Comment Id:** 1183916

Comment Text: Public statements about the initial alternative, including by state public officials, have questioned the Park Service's authority in relation to existing state statutes. See, e.g., "Inside the fight over frozen lakes in Voyageurs National Park; ATVs, trucks could be restricted," Star Tribune, May 4, 2023. Given that much of the community response has focused on NPS' authority over the waters, NPS should make clear under what legal authorities it is operating when it proposes to restrict activities on the frozen lake surface. During the April 19 online public meeting, NPS stated that it views the frozen surface as an extension of the land and thus NPS has jurisdiction over the ice roads. NPS should clearly identify the legal basis for its assertion of jurisdiction to clarify its position vis-a-vis state authority.

Correspondence Id: 117 **Comment Id:** 1183928

Comment Text: Because MN is a riparian state, a lake property owner owns and controls the land to the waters edge, and the water from that point on belongs to all Minnesota citizens. Minnesota statues are in force to defend the rights of all Minnesotans, which includes access to all lakes within the state.

Correspondence Id: 124 **Comment Id:** 1184091

Comment Text: Upon admission to the Union, Minnesota was conferred "the absolute right to all . . . [its] navigable waters and the soils under them for their own common use, subject only to the rights since surrender by the constitution to the federal government." State Anthony Falls Water-Power Co. v. Bd. Of Water Comm'rs of Saint Paul Minn., 168 U.S. 349, 359 (1897). It is important to note that no U.S. Supreme Court case nor any case authored by the Minnesota Supreme Court contains a caveat to this important principle that says that "the State has an absolute right to these waters only so long as they are not frozen." In fact, such a conclusion is inconsistent with the Minnesota Supreme Court decision in Sanborn v. People's Ice Co., 92 Minn. 43, 84 N.W. 641 (1900), in which the court found the taking of an excessive amount of ice from White Bear Lake to be a taking of water from the State's public water. And in Lamprey v. Metcalf, 52 Minn. 181, 7 N.W. 2d 342 (Minn. 1943), the Minnesota Supreme court expressly stated that the public and riparian owners' uses of the State's public waters included the public's right to skate and to cut ice for personal use. In short, the ice is not an extension of the land. The frozen water body is remains a public water and does not become a land mass subject to 36 CFR § 4.10, and thus the regulations established under 36 CFR § 4.10 cannot be applied to the State's public waters to restrict access across the surface of the public water, be it open or frozen.

Correspondence Id: 124 **Comment Id:** 1184093

Comment Text: When Minnesota acquired these public waters at statehood it acquired them with an express obligation - to hold ownership of these public waters as a trustee for the people, for public use. Illinois Central Railroad Co. v. Illinois, 146 U.S. 387 (1892) and In re Application of Union Depot St. Ry. & Transfer Co. of Stillwater, 31 Minn. 297 17 N.W. 626 (1883). The State is precluded from transferring title to these public waters and from relinquishing its obligations to the public to make these public waters available for public use. Id. Nor

may the State relinquish these obligations by conveying ownership of its public waters to a third party, including the NPS. The public's rights to these public waters extend across the entire surface of each public water within the VNP boundary and include the right to fish, to skate, to swim, to boat, and the free right to travel. These are indices of State ownership and cannot be stripped from the State and its people unless the NPS had acquired the lakes and the beds. To the extent that the Frozen Lake Plan would limit this right of public access to the entire frozen surface of State public waters, it would effectively take what the State refused to convey, the rights of ownership to the public water and beds within VNP.

Correspondence Id: 129 **Comment Id:** 1184005

Comment Text: What I have learned from the hearings and other materials presented, the State of Minnesota ceded the land to the National Park Service and not the water, including Lake Kabetogama and Rainey Lake and THE PARK SERVICE HAS NO JURISDICTION OVER THE WATER.

Correspondence Id: 130 **Comment Id:** 1184013

Comment Text: Honestly, I have no idea how you even have the authority to even put this in place. Voyageur national park is the land that surrounds the lakes. You do not own the lakes or the land under the lakes. In fact , you should not even have the authority to patrol the waters of kabetogama, namakan or sand point. Minnesota owns these waters and the DNR alone should be responsible for patrolling the lakes.

Correspondence Id: 137 **Comment Id:** 1185031

Comment Text: It can also be noted that Voyageurs National Park is claiming water rights in which legally were never ceded to the federal government by the State of Minnesota.

Correspondence Id: 138 **Comment Id:** 1185034

Comment Text: Voyageur's National Park doesn't have the authority and their proposal is outside the jurisdiction & authority. Mr. DeGross is wrong that frozen waters are land. MN statute 84B.061 states these navigable waters are owned by the state. The DNR disagrees with this plan as well.

Concern Statement 101: One commenter stated that park regulations regarding vehicle use and ice shelter placement on frozen lakes should be the same as the State of Minnesota's regulations on other lakes in the state.

Correspondence Id: 38 **Comment Id:** 1183508

Comment Text: The state of Minnesota allows the use of this type of vehicle on all other lakes in the state and their regulations should be those used for frozen lake access in the park.

Correspondence Id: 83 **Comment Id:** 1183619

Comment Text: Much of the things you are trying to manage (like how long shelters can remain on the ice) is already handled by Minnesota law. I think you should abandon these plans and allow activity to continue as it is. There is no real evidence that further rules or oversight is necessary.

Correspondence Id: 83 **Comment Id:** 1183620

Comment Text: Follow Minnesota law and the lead of the Minnesota DNR - they manage frozen waters well.

Correspondence Id: 107 **Comment Id:** 1183837

Comment Text: I would suggest simply continuing to follow Minnesota regulations.

Correspondence Id: 118 **Comment Id:** 1183940

Comment Text: It is my position that wheeled vehicle should be allowed consistent with Minnesota DNR rules and regulations.

Concern Statement 102: Commenters stated that the park's preliminary proposal conflicts with Minnesota state laws regarding vehicle access on frozen lakes, including riparian rights for riparian shoreland property owners.

Correspondence Id: 124 **Comment Id:** 1184089

Comment Text: At the outset, it is important to note that while the NPS obtained jurisdiction of lakes within the boundary of the park, VNP's federal enabling act required the state to convey lands within the boundaries but not its public waters nor their bed. Additionally, at the time VNP was created, the Minnesota Legislature authorized the State to convey lands for the establishment of VNP but no authorization was granted to convey the state's public waters or the beds of the waters to the federal government (Minn. Stat. § 84B.06). Thus, while the NPS may exercise jurisdiction over these public waters, it cannot strip either the State or riparian property owners of their legal rights to access these public waters because NPS does not own them.

Correspondence Id: 124 **Comment Id:** 1184092

Comment Text: The NPS has no legal authority to strip the State or the riparian owners of their interests in the State's public waters or its beds including the right to access the frozen surface, which the Frozen Lake Plan appears to do.

Correspondence Id: 5 **Comment Id:** 1182097

Comment Text: I find the entire rule change to be a further restriction on the use of a public MN waterway that the park service seems ever more intent on ruling without consideration of the MN regulations that have long been in place.

Correspondence Id: 99 **Comment Id:** 1183821

Comment Text: In the case of Riparian Rights: "The riparian owner has the right to make use of the lake over its entire surface (see: Johnson v. Seifert (PDF) 257 Minn 159, 100 NW 2d 689 [1960])." In the case of Riparian Duties: "It is the duty of the riparian owners to exercise their rights reasonably, so as not to unreasonably interfere with the riparian rights of others (see: Petraborg v. Zontelli (PDF), 217 Minn 536, 15 NW 2d 174 [1944])." Per Minnesota Statutes, ALL riparian shoreland owners - including the public when a lake has public access - have the right to use these lakes over their entire surface without any single riparian owner (Voyageurs National Park) unreasonably interfering with those rights. The Frozen Water Surface Proposal drafted by VNP directly conflicts with the Minnesota laws that governs the waters. It is an attempt by VNP to interfere with the rights of other shoreland owners and the public.

Correspondence Id: 106 **Comment Id:** 1184065

Comment Text: The Frozen Lake Surface Access and Use Plan the NPS is trying to impose is in violation of Minnesota State Law

Correspondence Id: 110 **Comment Id:** 1183881

Comment Text: The Minnesota Department of Natural Resources (MN DNR) already enforces fishing regulations on the lake including the concept of "leave no trace" when leaving the frozen lakes. Voyageurs National Park should not attempt to restrict this activity anymore beyond current regulations

Correspondence Id: 122 **Comment Id:** 1183978

Comment Text: • This Plan is in violation of Minnesota State Law 85B.061

Concern Statement 103: One commenter asked if the outcome of the park's final plan could have regulatory implications for use and access on other frozen lakes in Minnesota.

Correspondence Id: 118 **Comment Id:** 1183939

Comment Text: Unintended consequences to consider with the banning of wheeled vehicles on the lakes :
*Interpretation of frozen water - will Minnesota be setting a precedence on other bodies of water if the Park determines once ice freezes it becomes an extension of the land?

Concern Statement 104: One commenter stated that NPS must consult with the State of Minnesota before imposing permitting requirements for ice shelter rental or guiding fishing business in the park.

Correspondence Id: 124 **Comment Id:** 1184097

Comment Text: Furthermore, DNR does not consider the placement of fish houses by guides or the rental of fish houses to individual recreational anglers to be commercial fishing. Under Minnesota law, commercial fishing, is

defined as the "taking [of] fish, except minnows, for sale." Minn. Stat. § 97A.015. Minnesota requires that each angler renting a fish house or going out with a guide hold their own recreational fishing license. Therefore, the treatment of the businesses as commercial fishing (requiring a commercial use permit) is contrary to state law and VNP must consult with the state before it imposes additional burdens on rental or guiding businesses during the winter harvest season.

Concern Statement 105: One commenter stated that the preliminary proposal would have adverse impacts on the State of Minnesota's property interest in its public waters and its ability to carry out its legal obligations.

Correspondence Id: 124 **Comment Id:** 1184099

Comment Text: The proposed Frozen Lake Plan would have serious adverse impacts on the State's property interest in its public waters and our obligations associated with the public waters the State owns within the boundaries of VNP.

Concern Statement 106: Commenters cited the superintendent's compendium allowing ice shelters to be left unattended in the park and noted that this allowance is consistent with Minnesota regulations. One commenter noted that Minnesota regulations entitle the public to place ice shelters on the State's frozen public waters and restricting the placement of ice shelters would be a violation of that right. As a result, commenters requested no changes from the current authorizations.

Correspondence Id: 123 **Comment Id:** 1183989

Comment Text: Note the NPS Compendium signed on 1/29/2023 by Robert J. DeGross noted as follows. 36 CFR §2.22 - PROPERTY (a)(2) Property may be left unattended for periods longer than 24 hours in the following areas and under the following conditions: Structures used for fishing on frozen lake surfaces during the ice fishing season and in compliance with state laws V. Part 7: Special Regulations in Areas of the National Park System 36 CFR §7.33 - Voyageurs National Park (a) Fishing. Unless otherwise designated, fishing in a manner authorized under applicable State law is allowed. These points, as written in the Supervisor's Compendium, are reasonable and should preclude any proposed changes.

Correspondence Id: 124 **Comment Id:** 1184096

Comment Text: The regulation of fishing (both ice fishing and open waters fishing) includes not only harvest limits but the method, and location of harvest. For generations, Minnesotans have used fish houses for recreational fishing, many of which they leave in place during the entire winter harvest season. The placement of fish houses falls within Minn. Stat. Ch. 97C, which regulates the harvest and method of fish harvest and is a recreational fishing regulation. Minnesota Statute § 97C.355, in particular, regulates the placement of such fish houses and authorizes persons to leave fish houses unattended until March. The Frozen Lake Plan contradicts the State's fish house fishing regulation. Pursuant to the Enabling Act, the NPS is required to consult with the DNR about restrictions of this type.

Correspondence Id: 124 **Comment Id:** 1184098

Comment Text: Finally, DNR would again direct you to its comments above related to private riparian rights and the rights of Minnesotans. These rights entitle the public and riparian owners to place fish houses on the State's frozen public waters, and precluding these persons from placing fish houses overnight on the lake or restricting placement across major portions of a frozen lake surface would violate their rights to access the entire water body to, among other uses, fish. State v. Kuluvar, 266 Minn. 408, 418, 123 N.W.2d 699, 706 (Minn. 1963) (finding the public's right to access the state's public waters includes the right to fish).