

**FINAL  
GENERAL MANAGEMENT PLAN  
ENVIRONMENTAL IMPACT STATEMENT  
VOLUME II**



*Glacier National Park*

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**WATERTON-GLACIER INTERNATIONAL PEACE PARK  
THE WORLD'S FIRST INTERNATIONAL PEACE PARK  
A WORLD HERITAGE SITE**

Final  
General Management Plan and  
Environmental Impact Statement  
Volume 2

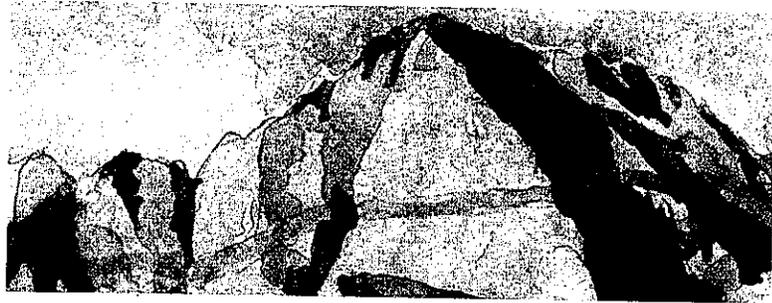
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**GLACIER NATIONAL PARK**

A Portion of Waterton-Glacier International Peace Park  
Flathead and Glacier Counties, Montana

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# Comments and Responses on the Draft Environmental Impact Statement

This second volume of the *Final General Management Plan and Environmental Impact Statement* for Glacier National Park presents copies of letters and hearing testimony with substantive comments on the draft document that were received from federal agencies, elected officials, state agencies, local governments, organizations, businesses, and special interest groups. Beside each reproduced letter or hearing testimony is the response of the National Park Service to those comments. Time and expense prevent reproducing all the 2,709 letters and testimony that were received. All letters and hearing testimony received are available for public inspection at park headquarters.

Following the responses to the reproduced comments, the substantive comments received from individuals have been summarized, and we have responded to those comments. Substantive comments, as defined in NPS-12: NEPA Compliance Guideline, are considered substantive if they

- question, with reasonable basis, the accuracy of the information in the document
- question, with reasonable basis, the adequacy of the environmental analysis
- present reasonable alternatives other than those presented in the environmental impact statement
- cause changes or revisions in the proposal

Where appropriate, the text in volume 1 of this document has been revised.

COMMENTS

RESPONSES

**Advisory  
Council On  
Historic  
Preservation**

2707

The Old Post Office Building  
1000 Pennsylvania Avenue, N.W., 20540  
Washington, D.C. 20540

Reply to: 2616 West Regent Avenue, #200  
Colorado Springs, Colorado 80902

February 3, 1999

Superintendent  
Old Faithful Project  
Chief, National Park  
U.S. Department of Interior  
West Glacier, MT 59936

RE: *Design General Management Plan, Glacier National Park, MT*

Re: Mr. Fambour

Thank you for providing us with an opportunity to comment on the referenced planning document. In general, we are glad to see that Glacier has incorporated the consideration of cultural resources into the management philosophy for the Park. We are also pleased that the Park identified the preservation of historic trails and visitor services as well as the Going-to-the-Sun Road as two of its critical issues during Glacier National Park. We agree with the Park's preferred alternative which specifies the preservation of these National Historic Landmarks as a top priority in managing the Park's diverse resources.

The Council, however, would like to voice our concern over the Park's proposal to relocate all structures outside of the Back plate along Divide Creek. Although such an approach may be desirable in some cases, we suspect that a full range of alternative treatments be considered. The historic properties priority involving them from their historic settings.

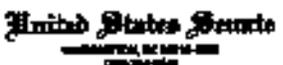
In the future, we look forward to providing you with our comments relating to the park's compliance with Section 106 of the National Historic Preservation Act and the National Park Service National Historic Preservation Agreement. The specific actions proposed under the final GMP. If you have any questions, please contact Tom Crider in our Denver Office at (303) 864-

Tom L. Crider  
Director  
Office of Planning and Review

Advisory Council for Historic Preservation—2707

- 1. Before the structures are removed the park will comply with section 106 of the National Historic Preservation Act.

1


  
 OFFICE OF THE CLERK
   
 UNITED STATES SENATE
   
 SENATE CHAMBERS
   
 WASHINGTON, DC 20540-5000
   
 (202) 512-1000

October 18, 1998

Mr. David Bellini, Representative  
 Clarks National Park  
 Clarks Project  
 West Clarks, NY 58736

Dear Mr. Bellini:

I want to thank you for the opportunity to express my comments on the alternatives for the Clarks Park General Management Plan and in particular, the issue of the Going-to-the-Sun Road reconstruction.

It seems clear to me that the reconstruction of the Going-to-the-Sun Road is a very important issue for the park and for the communities that depend upon the park for their survival. That's why it is extremely vital that we have all of the information and opportunities for public input that we can afford. Your comments need to be thoroughly developed and evaluated, before any decisions are finalized.

Efforts by Congressmen Rick Holt, with regard to obtaining appropriations for additional engineering studies, are to be applauded. With so much at stake, we have to be sure that every alternative has been studied very carefully in order to ensure the right decisions are made.

I urge everyone in attendance at this hearing to review the alternatives the park is proposing, not only for the Going-to-the-Sun Road reconstruction, but for the Management Plan in its entirety. Clarks Park is truly one of our national treasures. We must do everything in our power to preserve it and also to help provide for the demands of continued visitation.

Again, thank you for the opportunity to present my comments.

Sincerely,  
  
 Conrad Burns  
 United States Senator

Mr. Burns (202) 512-1000    Mr. Burns (202) 512-1000

Conrad Burns, U.S. Senator—0436

1. In the Department of Transportation Appropriation Act for fiscal year 1999, the National Park Service was directed to conduct additional economic and engineering studies on reconstruction of the Going-to-the-Sun Road. A total of \$1 million was earmarked from existing funds for these studies. See changes to the preferred alternative for Preservation of the Going-to-the-Sun Road. All comments and ideas on how to reconstruct the Going-to-the-Sun Road would be provided to the contractor for consideration.

COMMENTS

RESPONSES



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
EPAHQ-111  
1200 MONTGOMERY AVENUE, SUITE 335  
WASHINGTON, D.C. 20460-3355

1134

NOV 8 1988

Superintendent  
Glacier Project  
Glacier National Park  
West Glacier, MT 59998

Re: General Management Plan Draft EIS  
Glacier National Park

Dear Superintendent:

The U.S. Environmental Protection Agency (EPA) Region VIII has reviewed the Glacier National Park Draft General Management Plan Environmental Impact Statement (DEIS). One chapter of the DEIS was evaluated in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 303 of the Clean Air Act. The Park Service has obviously spent a great deal of thought and effort in developing the document which includes a detailed description of the proposed activities, the important environmental issues, and alternative maps and strategies. The Draft General Management Plan (GMP) does an excellent job in balancing the increasing demand for visitor amenities with protecting the environmental resources of the Park.

We offer the following specific comments on the General Management Plan DEIS:

EPA supports the Agency preferred alternatives for the following issues which have potential for environmental impact: Smoke Air Toxics, Potential Water Cont., and Water Use. In each case, the selection of the preferred alternative would cause several environmental problems which are potentially the responsibility of Park visitors. We encourage the Park Service to re-consider the management of these activities.

EPA strongly supports the Lead Agency preferred alternative for the Elbow Lake Forest Stand. This alternative represents a significant improvement over the existing conditions, and the Park Service is to be commended for selecting it. Selection of any other alternative would likely result in an environmental violation by EPA.

Regarding Visitor Use on Grange-to-the-Sun Road: Air Quality Issues (pp. 64, 210, 221): The analysis of air quality impacts from the various alternatives to this action was very limited in the DEIS. No information or data on the current air quality and visibility (smog) in the Park and surrounding area was included or referenced in the document. A supplement to the DEIS or the final EIS must include an assessment of air quality and visibility trends (in this respect) and the

1



EPA, Region 8—1134

1. Additional information has been added to the "Affected Environment" and "Environmental Consequences" chapters of the document. However, no baseline has been established yet because the period of collection has been too short.

COMMENTS

RESPONSES

1	<p>cumulative impacts (noise, power and resource demands) to air quality. The analysis should specifically include a description of sources of air pollutants in the Glacier Park area that potentially include mobile sources, industrial sources, natural gas field operations, etc.</p>
2	<p>Analysis of vehicle pollutants associated with Going-to-the-Sun Road was not limited. The only pollutant discussed was carbon monoxide. Through the DDEI estimates 600,000 cars annually, an indication of average daily vehicle turnover, or the peak day use is included. An estimate of the increase or decrease in average daily and peak use associated with each alternative should be included in the FEIS. Additionally, an assessment of vehicle idling and associated impacts to air quality should be included with each alternative along with an analysis of vehicle idling. The lack of information regarding air quality analysis does not allow the public or EPA to evaluate or challenge the original conclusion that there are no significant air quality impacts associated with any alternative to the Higher Use issue. A consultation with the Park Service included that additional air quality information and analysis of potential impacts would be included prior to deciding on alternatives. EPA requests an opportunity to review the additional information prior to the Park Service's decision.</p>
3	<p>Regarding water resource impacts from increased visitor use on the Going-to-the-Sun Road, Alternative B (p. 224): As mentioned in the document, parking lots are a major significant source of erosion pollution including sediment, soil erosion and petroleum products. The Park Service should evaluate the necessity, feasibility and potential benefit of implementing best management practices (BMPs) to mitigate street flow impacts to water quality at all parking and pull-out facilities, and include this analysis in the final document. These BMPs should be considered regardless of which alternative is selected.</p>
4	<p>The draft EIS does not address water management at parking lots in the Park. If there is water management (driving) at sites adjacent to water bodies, wetlands or riparian areas, BMPs should be included to ensure that pollutants (sediment, petroleum products, and trash) are not being allowed into these areas, and that there is no erosion, barrie or other BMP to prevent such pollutants from entering the water body, wetland or riparian area.</p>
5	<p>The proposed alternative (A), (B) does not mention any anticipated impacts to streams or wetlands from straying or idling. Assuming that there are indeed no such impacts, the statement in the second paragraph on page 194 should be modified as follows, "There would be no direct or indirect adverse impacts from straying or idling on hydrology, wetlands or water bodies from activities associated with this alternative."</p>
6	<p>Any stream or wetland idling or re-routing associated with Alternative B for visitor use on Going-to-the-Sun Road, the expansion of the Logan Pass parking facility, would require a 404 permit from U.S. Army Corps of Engineers (ACEC). Section 404 of the Clean Water Act requires the selection of the least damaging alternative to water resources, and any alternative that minimizes a stream is unlikely to be the least-damaging alternative. If the Park Service were to change the preferred alternative to Alternative B, it would be useful to re-evaluating the government decision process if the Park Service would consult with the ACEC in relation the alternative to this action prior to issuing a Final EIS.</p>



2. The average daily traffic and projected increase for alternatives A and B have been added to the document under "Impacts on Air Quality," in the section "Impacts of all No-Action Alternatives." There are no monitors along the road to measure vehicle idling; the only monitor is in West Glacier. Furthermore, to our knowledge the amount of vehicle idling that occurs along the Going-to-the-Sun Road is not substantial. Visitors drive the road slowly, in a leisurely manner. Patrol rangers have observed that some visitors turn off their vehicles when they pull off, but others leave their vehicles running when they get out of their cars. However, no monitoring has been done along the road at pullouts to find out if the air quality is being degraded, and how much. Therefore, an assessment of vehicle idling cannot be included in this document. As requested, this information was provided to the Environmental Protection Agency for early review.
3. The National Park Service uses best management practices during construction to mitigate impacts on water resources. Best management practices, which are too detailed to be presented in a general management plan, will be identified during the design phase of a project.
4. Snow management is too detailed for a general management plan to address. This is addressed in NPS operational plans for Glacier.
5. Thank you for pointing out our error. The text has been changed as you suggested.
6. The text for "Preservation of the Going-to-the-Sun Road" under "Impacts of All Other Alternatives" has been changed to reflect the need for a Corps of Engineers 404 permit. However, please note that this is not the National Park Service's preferred alternative.

COMMENTS

RESPONSES

Based primarily on the lack of a quality impact analysis associated with visitor use at Gettysburg National Battlefield, and on the recognition that the preferred alternative will be implemented, EPA is using the (b)(5) exemption from NEPA (24 CFR 101.103) to deny the proposed project. A full description of EPA's rating system is contained. We appreciate the opportunity to review this project and provide impact comments. Thank you for your willingness to consider our comments at this stage of the process, and we hope they will be useful to you.

If you have any questions regarding these comments, you may contact Mallory at my email at (301) 312-6704.

Mallory  
  
 Cynthia G. Cook, Clerk  
 NEPA Unit  
 Resource Protection Program

Enclures

cc: Steve Potts, USFWS Missouri Field Office (MFO)  
 Elaine Sanchez, USFWS, Office of Federal Activities

11/04/76 VOL. 10, NO. 10

1976

**U.S. Environmental Protection Agency Response to the 1976 Environmental Impact Statement  
for the Proposed Interstate Highway System**

**Environmental Impact of the Action**

**20 - End of Project**

The Environmental Impact Statement for the proposed Interstate Highway System (IHS) project is a comprehensive study of the potential impacts of the proposed action. The study is based on the best available information and is intended to provide a basis for the decision-making process.

**21 - Environmental Impacts**

The IHS project is expected to have both beneficial and adverse impacts on the environment. The beneficial impacts include the creation of new jobs and the improvement of transportation facilities. The adverse impacts include the loss of agricultural land and the potential for air and water pollution.

**22 - Environmental Mitigation**

The IHS project is expected to have both beneficial and adverse impacts on the environment. The beneficial impacts include the creation of new jobs and the improvement of transportation facilities. The adverse impacts include the loss of agricultural land and the potential for air and water pollution.

**23 - Environmental Monitoring**

The IHS project is expected to have both beneficial and adverse impacts on the environment. The beneficial impacts include the creation of new jobs and the improvement of transportation facilities. The adverse impacts include the loss of agricultural land and the potential for air and water pollution.

**Summary of the Overall Statement**

**Summary 1 - Air Quality**

The IHS project is expected to have both beneficial and adverse impacts on the environment. The beneficial impacts include the creation of new jobs and the improvement of transportation facilities. The adverse impacts include the loss of agricultural land and the potential for air and water pollution.

**Summary 2 - Land Use and Resources**

The IHS project is expected to have both beneficial and adverse impacts on the environment. The beneficial impacts include the creation of new jobs and the improvement of transportation facilities. The adverse impacts include the loss of agricultural land and the potential for air and water pollution.

**Summary 3 - Noise**

The IHS project is expected to have both beneficial and adverse impacts on the environment. The beneficial impacts include the creation of new jobs and the improvement of transportation facilities. The adverse impacts include the loss of agricultural land and the potential for air and water pollution.

<sup>1</sup> See the Environmental Impact Statement for the proposed Interstate Highway System, Vol. 10, No. 10, 1976.

COMMENTS

RESPONSES

1118



United States Department of the Interior

FISH AND WILDLIFE SERVICE

NATIONAL FIELD OFFICE  
300 N. ZEEB, SUITE 500  
BUREAU, NY 10018  
PHONE (212) 261-8000-4000

W.33 Director - DWP

December 10, 1998

Steve Frye, Chief  
Resource Management  
Director National Park  
West #1200, JCR 58334

Dear Steve:

This letter is provided to summarize the earlier discussion between Dale Humes of my staff and yourself regarding the section 7 consultation process under the Endangered Species Act as it relates to the draft General Management Plan (GMP) and Environmental Impact Statement (EIS) for Glacier National Park. The GMP and EIS was received in our Office on August 20. We appreciated the opportunity to comment on the GMP but due to the transfer of Kevin Shalley and our staffing limitations, we were not able to provide that review. As Dale indicated, however, we will meet our regulatory responsibilities with respect to the Section 7 consultation process to the best of our abilities should you determine that Section 7 consultation is required.

In that regard, the Park should prepare a biological assessment as a final preferred alternative to evaluate whether the proposed action is likely to adversely affect any listed endangered or threatened species or proposed species (refer to attached list). If you determine that any listed species is likely to be adversely affected, Section 7 consultation should be initiated with this Office. Additionally, if you determine that the action is likely to jeopardize the continued existence of a proposed species, you should confer with this Office to identify ways to resolve potential conflicts. If the biological assessment concludes that the proposed action is not likely to adversely affect any listed species, you should send the assessment to this Office for our review and written concurrence.

If Section 7 consultation is required, we will prepare and send you our biological opinion within 135 days of receipt of your request for Section 7 consultation. The section 7 consultation process should be completed before a record of decision is signed.

If you have additional questions, please call Dale Humes at 445-2220 (Ext. 210). When we have filled the position vacated by Mr.

U.S. Fish and Wildlife Service—1118

- 1. The United States Fish and Wildlife Service agreed to consider the Draft Environmental Impact Statement as the biological assessment. The U.S. Fish and Wildlife Service is still reviewing the biological assessment and our determination as described in volume 1 of this document. No opinion has been issued yet. The record of decision for this plan will not be signed until "section 7" consultation is concluded.

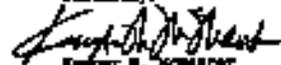
1

COMMENTS

RESPONSES

2-

Shelley. We will inform you as to who your new contact is with respect to section 7 consultations. Your cooperation and assistance in meeting our joint responsibilities under the ESA is appreciated.

Sincerely,  
  
Eugene H. Schaefer  
Field Supervisor  
Marion Field Office

cc: GARD, MRY/MS/MS/MI, FWS, Denver, CO

COMMENTS

RESPONSES

**Species List for Glacier National Park  
Project - General Management Plan**

The Fish and Wildlife Service has determined that the following listed and proposed threatened or endangered (OLE) species may be present within the project area.

<b>Listed Species</b>	<b>Special Concern</b>
golden bear (Ursus arctos horribilis) (C)	endemic
gray wolf (Canis lupus) (C)	endemic
grizzly bear (Ursus grizzly) (E)	endemic
lake trout (Salvelinus namaycush) (C)	endemic/seasonal/migratory
bull trout (Salvelinus confluentus) (C)	migratory, endemic
<b>Proposed Species</b>	
Canada lynx (Lynx canadensis) (C)	endemic and seasonal
bull trout (Salvelinus confluentus) (C) (St. Mary-Sully River population)	migratory, endemic
<b>Candidate Species</b>	
None	

1139

OFFICE OF THE GOVERNOR  
STATE OF MONTANA

MARK SACCO  
Governor



STEVE COOPER  
DEPT. OF ENVIRONMENTAL QUALITY

November 26, 1988

Superintendent  
GMP/ES Project  
Gardner National Park  
West Glacier MT 59282

Dear Superintendent:

Thank you for the opportunity to provide comments on behalf of the State of Montana for the draft Glacier National Park General Management Plan (GMP) and the Environmental Impact Statement (EIS). The complex and difficult issues addressed in this document of course will no doubt be subject to state discussion and review because the future management plan for Glacier National Park is important to Montanans as well as to many other Americans.

We have carefully reviewed and analyzed the EIS. As with other efforts of this nature, we utilized the expertise and various disciplines within state government, which included this office and the Departments of Fish, Wildlife and Parks; Environmental Quality; Commerce; Natural Resources and Conservation; and Transportation.

1 Since this document is a programmatic EIS, not site specific, it is difficult to ascertain with great certainty what the Park's specific long term plans may entail. We understand that in the years to come additional National Environmental Policy Act (NEPA) processes will occur and will be tied off this GMP. This means Glacier National Park will utilize the GMP as the basic mechanism for new studies and site specific decision documents in accordance with NEPA. As Glacier National Park moves forward in this process, we would like to request that the State of Montana be notified and consulted with regard to the development of any new National Environmental Policy Act (NEPA) documents. In addition, the State expects substantive involvement in the engineering and economic studies for the Going to the Sun Road which were mandated in the Fiscal year 1989 Appropriation Act.

Delivered within existing legislation, the purposes for the existence of the National Park Service (Service) and Glacier National Park (Park), are two-fold, with neither outweighing the other. They are: to provide a stimulating ground for people; and to protect natural resources for generations to come.

TELEPHONE: (406) 455-8811 FAX: (406) 542-2899

Governor of Montana—1139

- 1. The National Park Service will be happy to consult with the state of Montana as we proceed with the engineering and economic study of reconstruction alternatives for the Going-to-the-Sun Road and with plans for implementing the *General Management Plan*.

COMMENTS

RESPONSES

Superintendent  
Page 2  
November 25, 1998

Included within the enabling legislation establishing the National Park Service are statements that the Service "shall promote and regulate the use of the Federal areas known as national parks, monuments, and reservations" — and that the Service's "purpose is to conserve the scenery and the natural and historic objects and the wildlife therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations."

In identifying the lands that comprise Glacier National Park in the enabling legislation, the intent of Congress was to set these lands "apart as a public park or pleasure ground for the benefit and enjoyment of the people of the United States under the title of 'Glacier National Park.'" This act also provided that the Secretary of the Interior "shall provide for the preservation of the park in a state of nature so far as is consistent with the purposes of this act, and for the care and protection of the fish and game within the boundaries thereof."

It is important to review these statutes in order to consider whether the GMP is consistent with the purposes the National Park Service and Glacier National Park were created. Unfortunately, the GMP does not do a complete job in discussing or analyzing the alternatives and impacts as they relate to visitor experiences and gateway communities or even how the National Park Service will fulfill its statutory mandate and mission to serve the American people.

We appreciate the document including comments related to cooperation with Park neighbors in the general management philosophy for Glacier National Park. We believe this is a key element to the long term success, public enjoyment and support for the Park and its operations. We would encourage Glacier's management team to more aggressively engage and join with its Park neighbors in creating solutions to Park issues.

2 Unfortunately, the GMP does not recognize adequately the historic link between the Park's origin and private tourist development efforts. For example, the Park's major historic hotels were all built by the Great Northern Railway Company to support tourism. While these are references to the Great Northern, the linkage between tourist travel and the Park's existence is not recognized. This is an important concept to include since it could provide balance relative to the socio-economic impacts of management decisions.

3 Historically and today, the communities around our national parks help the National Park Service about their mission. The recreation industry was developed in part to help the National Park Service fulfill its mission, policies and congressional mandates. In fact, in its infancy, the National Park Service identified the public's need to access and view national park sites before the American public would support a national park system both financially and politically. Unfortunately, the Environmental Organizations do not fully analyze this issue. Consideration should be given to whether the impact topics for consideration (pages

2. Please see the section "Cultural Resources: Park Use and Development" and the section "Socioeconomic Environment: Regional Use and Economy."
3. Although communities around parks provide visitor services, the agency contracts with concessioners to provide various necessary or appropriate visitor services inside the park as needed to meet the agency's mission. The National Park Service took into account at every level the impacts of the alternatives on local communities around Glacier. The park has a direct role in coordinating and communicating with tourism agencies and local communities and participates at every level, including day-to-day park operations. Various park staff, including the superintendent, hold ex officio or board seats on tourism and other community organizations. The superintendent is an active member of Governor Racicot's Montana Tourism and Recreation Initiative. We respectfully disagree with the assertion that the park or the Park Service has a mission requirement related to the "recreation industry" around Glacier that is missing in this plan.

COMMENTS

RESPONSES

Superintendent  
Page 3  
November 21, 2008

3

957 - 960] address how the MFS will fulfill its statutory mandate. Specific areas for additional analysis are: the Park's role and processes used in consultation and communication with the tourism industry and the gateway communities; and exploration of management alternatives related to the role of the Park's mission.

4

Along the same lines, the CEIS references the Service policy of avoiding logging and future trends (page 14). The document mentions that fewer than 40,000 cars used the Going to the Sun Road in 1993, and that now there are over 200,000 cars using the road annually. The GMP contains statistics for certain years, and makes the statement "The overall trend is for increasing visitor numbers" (page 140). However, the document does not indicate the number of specific or general trends the Service expects and are planning for within the GMP. Is preparing for the 20 year, programmatic document did the Service do any study to forecast future trends?

**Design in the Sun Road.** This is obviously the most challenging aspect of Glacier National Park's management over the next 10-20 years. We believe the Going to the Sun Road is a critical economic, social, cultural, and historical asset. Its condition also has a direct impact on neighboring communities, as well as an effect on overall visitation to our state. It is imperative that this road be maintained and repaired in a way that provides for the enjoyment and safety of current and future generations, while minimizing the economic and social impacts during the construction process.

5

The document discusses a list of criteria for road construction reconstruction (page 48). We suggest that public safety and design life are two other criteria that are important. The road reconstruction plan should address the listed criteria, but should also ensure that the final result provides for public safety and is long lived enough to ensure that reconstruction is not a constant safety along the roadway. We believe a design life of less than 20 years would be consistently and unnecessarily disruptive and a longer design life should be included among the goals for the road.

6

There is no analysis of potential impacts to the routes under state jurisdiction during the five-year construction phase. Within the "Fiscal Impact" section, the document should specifically recognize the need to coordinate with the Montana Department of Transportation relative to any planned construction projects on all routes which will serve through-traffic if the Going to the Sun Road is set-aside for reconstruction. There should also be an analysis of the capacity and safety implications on these routes. The document should include a commitment for close coordination to require no adverse impacts to regional mobility.

7

We suggest the Park's assumptions relative to construction alternatives, including unique engineering and design constraints should be fully disclosed. For example, according to an April 8, 1998, letter to you, the total structure cost of the GMP's preferred alternative

4. Current and expected future trends are addressed under "Why a General Management Plan Must Be Prepared" in the "Introduction."
5. We concur with your suggestions regarding road reconstruction. In our standard operating procedures, safety and design life are considered in all highway design construction activities.
6. We concur. Please see the changes we have made in "Impacts on the Socioeconomic Environment" under the preferred alternative. The other concerns you mentioned will be addressed in the forthcoming engineering and economic studies of road reconstruction.
7. The concerns you mentioned will be addressed in the forthcoming engineering and economic study of road reconstruction. It is incorrect to assume that safety is not a goal; in fact, safety is paramount to everything we do. Also please see response 5, above.

COMMENTS

RESPONSES

Superintendent  
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7

would be preceded by other construction activities which had start of full closures. Since any construction activities on the route are likely to disrupt the visitor experience, the timing of the engineering assumptions and constraints should be disclosed. This includes the Park's position relative to safety improvements, which, as we understand it is not one of the goals for the road's improvement. If this is correct, is there not liability associated with this position that should be discussed? We also feel it is important to describe the level of uncertainty relative to the proposed construction time frame for the type of restoration envisioned for the road. High quality restoration of a historic facility has inherent uncertainties relative to engineering - these should be discussed since economic impacts will be directly related to the length of any closure. We also feel the assumptions behind traffic control should be discussed; and, as traffic control has a significant impact on the duration of closure, all options and mitigations should be discussed relative to the construction alternatives. There is also a need to discuss those engineering alternatives which have been rejected.

8

At a November 13, 2008, meeting in Helena, with state representatives, National Park and federal officials shared requested engineering assumptions and analysis relative to the preferred engineering alternative for the road, Alternative A. This alternative would close the Going to the Sun Road to through traffic for four to six years. Based on these discussions and subsequent analysis by the Montana Department of Transportation (MDT), we believe the assumptions and the preferred alternative should be reevaluated to proactively investigate alternatives which would permit closures of much shorter duration. The following are comments relative to the traffic control and engineering assumptions which were used in arriving at preferred Alternative A.

1. We do not agree that you need to limit your road closures to 15 minutes. The public will tolerate road closures for longer periods if they know when the road will be open for traffic. This requires a coordinated and continuous public information effort. For example, MDT allowed the contractor to close the road on the Troy-Libby project on US 2 for two hours at a time based on a routine schedule, thus allowing significant progress. This worked very well and resulted in very few customer complaints. We feel that part of the success of this approach was that the public could count on the road being open at specific times and could plan accordingly.

2. We believe most of the cold milling and paving could be done at night or with only one lane of traffic being closed. This approach should be included in overall strategies to reduce the duration of any necessary closures. The MDT has had projects where the cold milled surfaces were driven on for days until the project was paved. As these milled surfaces do occasionally present control problems for motor vehicles and bicyclists, there may need to be special traffic control during these periods.

- 8. The issues you mentioned regarding reconstruction of the Going-to-the-Sun road will be analyzed and reevaluated in the pending engineering and economic study of road reconstruction.

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3. The 1987 retaining wall inventory, which was shared with the MUT during the November 13, 1995, meeting, only shows 3 locations where two traffic lanes will have to be closed to fit the retaining walls. These walls are located at miles 28.54, 29.06 and 29.52. The maximum length of time estimated to fit any of these walls is 15 days. That equates to a maximum of a three week road closure if all three locations are worked on at one time. An approach which includes simultaneous construction at multiple sites should be included as it will help to reduce the duration of any necessary closure. In addition, the closure could be scheduled at the end or before the beginning of the peak visitor season. At the other wall locations, only one lane or no lanes will need to be closed. If most of the traffic is directed in one direction – up in the morning to Logan Pass and down in the evening to the main road area – a one way traffic control plan that avoids a complete closure could also be used. These strategies should be taken together and included in an approach to minimize or avoid total closure.

4. Most of the 1987 wall inventory shown in Tables 1 and 2 indicate that the locations would require 4 to 16 days to complete the work. If the contractor is required to work two shifts, these times could be cut in half. Again, this strategy should be included in an overall approach to minimize or avoid total closure.

5. The proposed plant mix locations at Sun Point and Logan Creek may not be practical areas for contractors to produce their plant mix material. If the elevations at these locations are too high the business on the contractors hot plant will not operate very efficiently. Contractors may need to produce their hot mixes at lower elevations and do longer hauls to increase their hot plant outputs. Have these locations been tested for hot plant production?

We recognize that the time line for the Going to the Sun Road reconstruction project must respond to a number of elements. Obviously, the primary element is Congressional approval and funding for the project. Without this, the preferred alternative or any other does not exist. With this in mind, we present the following recommendations for incorporation into the time line. We feel that the Going to the Sun Road reconstruction should begin after 2006 to accommodate the focus efforts will receive during the Lewis & Clark Bicentennial. The anticipated increased interest in historians during this period could provide a mechanism to get the word out about the improvement plans for Glacier and the variety of opportunities that exist at the Park even without the opportunity to take a private vehicle over the tunnel roadway. This reconstruction assumes that Park managers and qualified experts can be reasonably confident that the Going to the Sun Road will provide visitors safe passage during this period of time. If this is not possible, the project time line must provide the Park and all its federal and state partners ample time to develop and implement regional, national and international public education programs highlighting the many opportunities Glacier offers. The construction time line must also allow the appropriate agencies and private sector partners ample time to assist with

9

- 9. Your concerns regarding retaining walls, times of closure, plant mix locations, and funding have been considered in the development to date and will continue to be addressed in the forthcoming engineering and economic study of road reconstruction.

COMMENTS

RESPONSES

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November 20, 1998

committee and business prepare for the reconstruction projects impact on visitor access to the Park.

10

The White House Council on Environmental Quality (CEQ) regulations regarding NEPA states with regards to the alternatives section that the agency shall "include appropriate mitigation measures not already included in the proposed action or alternative." The GMP, however, does not do an adequate job in identifying or analyzing mitigation measures.

11

Any alternative may be accompanied with an active marketing, public education and service development plan focused on increased opportunities for visitors in the Park's areas outside the closure zones. These would be mitigation measures. This plan should begin four to five years prior to the road closures or major construction activities. It must also involve the Park's partners. This marketing effort would be similar to the successful program that followed the Yellowstone National Park fire of 1988. The main difference is that this plan would be a pro-active approach instead of a reactive effort. This is actually called for within the National Park Service organic act, reauthorized under, which established the Service to "protect and regulate use of the Parks." The Montana Department of Commerce would be willing to be an active partner in such a program.

The plan should focus on creating visitor opportunities outside the closure zones that would be attractive to visitors. It would provide opportunities (and incentives) for visitors to satisfy their interests in the Glacier Park area in ways other than driving over the Going to the Sun Road. The opportunities identified could be developed to satisfy the Park's dual mission of providing a pleasing ground while preserving the Park's natural state. Attached to these comments, are a number of ideas, concepts and themes for these additional visitor services. While they are site-specific and may not be appropriate for inclusion within the GMP, they are worth considering by the Park and its partners, including the State of Montana.

12

Economic analysis. The document asserts that with regards to the Road the least impact to the local economy would occur with the preferred alternative, which accelerates reconstruction over a four-year period. There is, however, no analysis to support this or an in-depth discussion of mitigation measures, which are essential to support and are actually required by regulators. Perhaps other Park sanitation and preservation projects that would offset negative economic impacts to the local economies from the road closures could help mitigate this impact.

With regard to the entire document, the claim that the "preferred alternative would have a positive economic benefit on the local and regional economies and would add to an already robust economy" (page 280) appears to be based on speculation and assumptions. The assumptions include that Congressional funding would be allocated for the Road and hotels and that only Montana contractors would be hired. It is not

- 10. Mitigative measures are identified for the level of detail addressed in the plan. Additional, more specific mitigative measures will be identified in the pending engineering and economic study of road reconstruction.
- 11. A plan addressing marketing, public education, visitor opportunities, and similar concerns will be completed either with the engineering analysis or soon thereafter.
- 12. The socioeconomic concerns you mentioned will be addressed in the forthcoming engineering and economic study of road reconstruction. In preparing the *Draft General Management Plan and Environmental Impact Statement*, the park used the best information available at the time, including economic analyses prepared for the park by John Duffield of Bioeconomics and by Norma Nickerson of the Montana Institute for Recreation and Tourism Research.

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appropriate to present the above statement as conclusive when all or some of the assumptions might not in fact occur.

13

The BME states that approximately 600 million and 2400 jobs are generated annually in Montana by Glacier National Park (page 47). The understated these numbers were generated from a program called the Money Generation Model that was done in the early 1990's and that the model is simplistic and tends to attribute the Park's economic impact on a local area. It estimates sales, tax revenues and jobs that could be attributed to the Park. It writes on a very gross scale and therefore it is very conservative. The BME should disclose to the public that this is an extremely conservative representation of Glacier National Park's influence on the Montana economy and that all management actions should recognize the major role the Park plays in generating and sustaining employment and the economy.

14

The document does not discuss or discuss the impacts on local or state jurisdictions with regard to revenue (taxes) and services which these entities are obligated to provide.

15

**Preservation of Historic Hotels and Visitor Services.** The document seems to have contradictory or misleading statements regarding the funding issues surrounding the preservation of historic hotels and visitor services. Alternative A, the preferred alternative (page 35), states that Congressional appropriations would be sought to purchase the hotels from the concessioner and that the Service would provide for the hotels' rehabilitation. Yet, included within Appendix C (page 261) is the statement, "A variety of methods were reviewed by the National Park Service to fund rehabilitation of historic overnight accommodations in the park. However, no one method has been selected yet." It is unclear what the preferred alternative is.

In addition, Appendix C (page 261) also states "Obtaining a congressional appropriation for 200 million would require strong public support. The National Park Service recognized that this would be extremely difficult." Based on these comments, is the Service properly disclosing and recognizing the likelihood of future actions and is it appropriate to rely upon it within the preferred alternative? If this will be "extremely difficult", it would be in the best interest of the Park to review and discuss other options and reconsider a more realistic and obtainable proposed alternative.

16

The document does not fully disclose to the public the complex issue of ownership of those historic facilities. The document states, "In the early development of the national park system the large national parks in the west did not have facilities for meals and lodging. The size of the parks and the time required to traverse them before there were roads necessitated the establishment of lodging and food services in the park. Concessions became an effective means of providing the services. To some extent this still holds true. Although modern methods of transportation have improved, there is still a strong desire on

13. Please see the changes in the figures we have made under "Background" in the "Preservation of the Going-to-the-Sun Road" section in volume 1 of this document. Also please see the new appendix C, "Money Generation Model".
14. Economic impacts were discussed in the "Environmental Consequences" section of the draft document. Further analysis will be done in the forthcoming road reconstruction study.
15. We concur that the discussion of the preferred alternative for this issue was confusing. We believe we have cleared up these inconsistencies in this final document.
16. Language has been added to clarify the ownership of the historic facilities. Please see the discussions of the various lodges and hotels in the "Preservation of Historic Hotels and Visitor Service" chapter.

COMMENTS

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16

the part of the public to stay in or near the park" (page 142). However, the document does not adequately review all of the options with regard to the preservation of historic hotels and services to ensure that the facilities are there for the public desire.

17

The CEO regulations state in context of the alternatives section that the agencies shall "rigorously explore and objectively evaluate all reasonable alternatives." Unfortunately, the document does not discuss the following alternatives for consideration: expanded season, including an increased shoulder season; new facilities in other locations; longer term contracts with concessionaires; completion of a feasibility statement on the needs and potential funding sources for concessions; and current owner financing of renovations.

Based on the Service's admission that Congressional funding for the purchase of the historic hotels would be difficult, it appears that the private sector offers the best opportunity to provide the needed renovation of the hotels within a reasonable period of time. We are aware that the current concessionaire, Glacier Park Inn, has put together a proposal to address the properties they currently own within the park. Other private sector entities may be willing to address this issue as well. As mentioned earlier in these comments, the private sector has always been closely involved and largely responsible for the service perspective within Glacier Park. Funding in private sector sources for the renovation needs of the historic hotels would be consistent with the historical relationship.

18

The EISF mentions that the buildings being closed for the winter can experience damage from lack of use (page 184). However, increased use of the Park for the winter is not included as an alternative or considered as a mitigation measure in funding the necessary repair and remodeling. In fact, as with other areas of the document, mitigation measures are not fully explored or considered.

19

In addition, included within the discussion of impacts of the No Action Alternative (page 184) it states "No action would result in eventual closure of hotels." Again, what is the basis for this statement? The document does not discuss to the public why this would occur. In addition, the document states "In the long-term, without upgrading, winter park lodging would have to be closed for public safety reasons" (page 184). What is the basis for this statement? In addition, if funding is not available, how will the Service meet their generalist management goal?

20

Scenario Air Issues. Included in the impact analysis pertaining to concessionaires, there is a statement that the diesel "does not exceed the air flow industry to completely disappear from the area" (page 284). The reason for this is the assumption that "operations would still be able to conduct air leave around the park and would have the option to develop (and in the adjacent Bob Marshall Wilderness complex). However, the document does not discuss any effects to the Bob Marshall Wilderness with regards to air quality, noise or other related issues. If these are discussed for the Park's wilderness areas, why

17. We disagree. We believe that we have developed a full range of viable alternatives. In the chapter "Alternatives, Ideas, and Strategies Considered but Rejected," under "Funding Strategies for Rehabilitating Historic Hotels and Visitor Services," the option of concessioner funding of rehabilitation is addressed. In appendix D, private investment funding is mentioned as an acceptable alternative if these impacts or costs could be mitigated.

The chapter on "Compliance with Federal and State Laws" has been modified to include a discussion of the National Park Service Concessions Management Improvement Act of 1998. The implications of this recent law on a private funding alternative are also discussed on in the document.

18. Please see response 17, above. In addition, considerable public input and comment have been received since 1995 for our use in developing the *General Management Plan*. Comments from the public on the winter use issue in the draft document supported the no-action alternative. Opening facilities in the winter was an alternative considered, but it is not the preferred alternative.

19. These hotels have been evaluated by many professionals, and on the basis of their evaluations, we believe that if we continue the current course of action, we eventually will lose these structures. Until that time, the National Park Service would meet its mandates through the discretion provided in the National Park Service Concessions Management Improvement Act of 1998, and other appropriate mandates.

20. Please see the revised "Environmental Consequences" chapter in volume 1 of this final document.

COMMENTS

RESPONSES

Superintendent  
Page 8  
November 20, 1998

20 would they not be discussed for Forest Service wilderness? In addition, what is the basis for the assumption that these tours would mitigate the effects on burning the towers over the Park?

21 Because the State has extensive holdings of state lands adjacent to the Park in the North Fork of the Flathead drainage it would be important for us to know that a ban on air tours, if one occurs, would not be construed to have any effect on administrative flights (such as routine fire patrol flights), nor would the utilization of air space over portions of the Park be considered a violation of the ban if it were necessary to accommodate aerial tower drops or wildfires burning on adjacent state or federal lands.

22 Winter Use. While the GMP discusses winter use in the region (pages 148-150), there is no firm commitment to enhance winter opportunities and opportunities. The document does not fully address or analyze the potential for winter use. Expanded winter use at Glacier Park is a natural part of the growing interest in winter recreation in Montana's Flathead Valley. Improving the basic visitor services within the Park -- restroom facilities and signage -- is appropriate.

Also, the use of groomed trails is not fully discussed or analyzed in the document. Groomed trails for cross-country skiing, while taking into consideration critical wildlife areas, could be a way to allow for new experiences within the Park while still being consistent with the overall management philosophy and the enabling legislation creating the National Park Service and Glacier National Park.

23 West Side Discovery Center and Museum. We support improving services and interpretation at Glacier's visitor centers. We support the proposed West Side Discovery Center and Museum and encourage the final GMP to propose a similar center at the east entrance of the Park. The East Side center could be an expansion of the current St. Mary's Visitor Center or the creation of another center with themes that either complement the West Side Discovery Center or cover a whole new topic regarding Glacier Park.

24 Air and Water Quality. When the GMP undertakes site-specific projects to implement the plan, we assume the Park and/or its contractors will work closely with the Montana Department of Environmental Quality (DEQ) to ensure that best management practices are appropriately implemented for stormwater control at all construction sites (particularly as it may relate to the potential for impacts on bull trout) and to ensure appropriate practices are utilized for asbestos removal in Park structures. Similarly, as public water and waste water systems are replaced and/or upgraded, it is assumed that the Park would comply with the requirements of the Safe Drinking Water Act and the Clean Water Act and delegated state programs. These statutes should also be added to the section starting on Page 696.

- 21. Implementing the preferred alternative for scenic air tours would not apply to airspace outside the park, nor would it preclude administrative use of aircraft for such needs as fire management.
- 22. Under the National Park Service's preferred alternative, providing for winter use would be limited to additional snowplowing (including parking areas) and the installation of restrooms at selected trailhead locations. Additional signs would be provided where appropriate. The preferred alternative was developed with the general public and the tourism community to develop a comprehensive winter-use role for Glacier National Park that would focus on nonmotorized and more self-reliant visitor activities that complement, not compete with, established winter recreational activities. Groomed ski trails were considered during the planning process; however, they were considered inappropriate because of the desire to emphasize nonmotorized winter recreation, and based on public input to regulate visitor activities so as to preserve a state of nature, as provided in Glacier's enabling legislation.
- 23. A similar center is already at the east entrance to the park at St. Mary and its themes, services, and exhibits would be taken into account during the implementation of this plan.
- 24. Adherence to best management practices is a requirement of all construction projects in the park, as is mentioned in the section on compliance with laws. The park will consult with Montana state agencies regarding compliance with air and water quality requirements.

COMMENTS

RESPONSES

Superintendent  
Page 10  
November 26, 1998

25

Page 228 references air quality conditions in Flathead County, but the context for this statement is not included on Page 134L. Also, while the statement appears on page 197, to improve the usefulness of the final document as a long-term resource, the term 'biodiversity' should be added to the index for ready identification of management goals related to biodiversity.

26

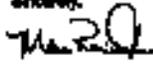
DEC has been working with most of the 2-stroke engine manufacturers to develop alternative fuels, lubricants and power technologies that reduce pollution and fuel expense in alternate fuels and transportation modes and systems, and other pollution prevention activities, as illustrated in the Yellowstone region of Montana. The National Park Service should work with DEC, private entities, and other agencies, to develop cooperative demonstrations of alternate fuel and transportation technologies to reduce impacts of transportation and recreation in and around Glacier National Park.

27

Environmental Consequences. In the Environmental Consequences section, it is difficult to determine the differences between the impacts of the alternatives. For instance, in the impacts on Scenic Resources for the no action alternative (page 154), there is no mention of a 'wild area' even though the preferred alternative states that 20 percent of the Park would be managed as a 'wild area' (page 129). To properly compare the impacts, they should be consistently analyzed and discussed. In this example, would not all wilderness management be common to all alternatives?

28

Conclusion. We greatly appreciate the opportunity to provide comments on the future management of Glacier National Park. Again, we would like to request that the State of Montana be notified and consulted with regard to the development of any new National Environmental Policy Act (NEPA) documents as a result of the General Management Plan process. And the State requests substantive involvement in the engineering and economic studies for the Going to the Sun Road which were mandated in the Fiscal year 1999 Appropriation Act.

Sincerely,  
  
MARC RADCORT  
Governor  
Enc.

- 25. Discussion of Flathead County air quality has been added to the affected environment for "Air Quality" section. The term biodiversity has been added to the index.
- 26. The cooperative efforts you suggested have begun. The park will continue to work with state officials on the issue of alternative fuels and other methods of reducing pollution.
- 27. We agree. Wilderness management is common to all alternatives.
- 28. Thank you for your comments on the draft document. The National Park Service will continue to ensure that the state of Montana receives park NEPA documents via the State Clearinghouse. We also look forward to working with state officials on the pending engineering and economic study of the Going-to-the-Sun Road.

COMMENTS

RESPONSES

04/07



Montana Department  
of Transportation

Araminta Chiles  
JAMES Ryan, District  
#10 Box 22,70  
Helena, MT 59604-0170

Phone 406-444-2865  
EIA #200-444-2255

Mark Deaton, Director

October 19, 1996

QUALIFIED Project  
Gardiner National Park  
West Glacier, Montana 59906

Subject: Draft General Management Plan

Dear Elan or Madeline:

In the overview of the draft general management plan it is written; "Glacier National Park is a legacy to the American people and to the world... The park carries different things to different people... Glacier has become an increasingly popular destination for visitors with a wide range of activities and expectations. Visitors to Glacier are able to enjoy the park in their own vehicles and drive the famous Going-to-the-sun Road across the triple divide and other scenic routes. They choose multi-roomed hotels, activities on horseback riding, canoeing, and fishing; they also hunt towns on the lakes and stay in historical hotels or campgrounds. Visitors can hike on 750 miles of trails throughout the park."

Glacier National Park does carry different things to different people and the benefit and enjoyment of the park should also include scenic air travel and air traffic. The tourism for people's park activities include recreational vehicles, foot travel, water travel and horse travel. The access to Glacier National Park is provided in dramatic perspectives with tolerance for all to experience the park, all through air travel. For air travel and scenic air flight there is no tolerance. Glacier National Park should be managed to allow its use by a wide spectrum of the people.

The preservation of the park in a state of nature is actually best done by air travel. The work is not needed by road or foot path. The erosion caused by horses and scales is not felt by air traffic. The handling of difficult road repairs and traffic maintenance are not limited to the air. Development like parking, emergency services, parking lots and sanitation facilities are not valued, hence of air flight. "Leave no trace" skills and advice are actually achievable best by the air.

The Federal Aviation Administration regulates aviation throughout the United States, including the airspace above national parks. The regulations balance aviation interests and safety. This is where aviation continuity and management should stay.

cc: Road Department Logbook

Montana Department of Transportation—0407

Thank you for your comments.

COMMENTS

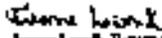
RESPONSES

Wilderness is for everyone, whether hiking, climbing, horseback, fishing or flying over all  
trees and water to protect our wilderness and our National Parks. We appreciate the  
opportunity to be heard in this draft general pack management plan and hope the  
overall philosophy includes air traffic and scenic air tours.

Thank you for this opportunity to be heard.

Sincerely,

Michael D. Fryman  
Aircraft Pilot

  
James L. Smith, District Chief  
Safety and Education

2708



**MONTANA HISTORICAL SOCIETY**

**HISTORIC PRESERVATION OFFICE**  
1024 10th Avenue • PO Box 624888 • Helena, MT 59606-1888 • 406/241-7728 • FAX 406/449-4974

NOTING



Dave Killeen, Superintendent  
Officer National Park  
West Glacier MT 59939

Dear Superintendent Killeen,

Thank you for the opportunity to review the draft General Management Plan for Glacier National Park and your response for a formal written response. This entry notes the comments of the plan regarding the protection of historic resources. Inasmuch as the Park states categorically that it intends to protect these resources and because the park is located by historic sites and vegetation. In do so we have no further comment to add. We refer to the national management agreement under which all state historic preservation offices conduct periodic reviews in cooperation with acts of the National Park System. It is this agreement which guides the future of specific undertakings within the park. We look forward to continued cooperation under the terms of that agreement on a case-by-case basis.

  
Paul M. Peier  
State Historic Preservation Officer

Montana State Historic Preservation Office—2708

Thank you for your comments.



COMMENTS

RESPONSES

2

ROAD CRACKS AND WEAR AND TEAR IN SOME OF THE MONTHS FOR NEARLY ALL CALIFORNIA FALLS TO CALIFORNIA STATE PARKS DEPARTMENT.

AGAIN, I WANT TO THANK YOU FOR TAKING THE BULL BY THE HORNS TO WORKING TOWARD FINDING THE BEST WAY TO REPAIR THE CRACKS TO THE ROAD AND WILL KEEP THE LOCAL BUSINESSES WORKING THE AREA VERY CLOSELY AS WE HAVE ALREADY DONE A NUMBER OF TIMES IN THE PAST YEAR TO THE POINTS WHERE THE ROAD IS CRACKED. MY FEELING IS THAT WE CAN WORK TOGETHER TO BRACK A WORKABLE SOLUTION TO A COMMON PROBLEM. FROM YOUR COMMERCIAL LEADERSHIP, I QUOTE: "I HOPE WE CAN USE THE CHALLENGE WE ALL FACE WITH THE ROAD CONDITION TO FORM THE MOST SUCCESSFUL COOPERATION FOR AROUND THE PARK, THE STATE AND THE AFFECTED COMMUNITIES, TO BRACK BACK OUR VISITORS."

RESPECTFULLY SUBMITTED,



GARY D. HALL, DIRECTOR OF CALIFORNIA PARKS

COMMENTS

RESPONSES

0694



November 4, 1998

Office of the Superintendent  
 Glacier National Park  
 West Glacier, Montana  
 USA  
 59914

Dear Sir:

Re: Draft General Management Plan  
 Glacier National Park

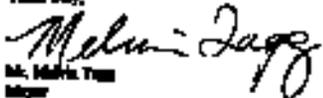


The Town of Cardston would like to express some concerns with the Draft of the General Management Plan for Glacier National Park, specifically, the issue of building the closure of the Going to the Sun Road.

Approximately 20% of the visitors we have at our Information Center from May through September of each year originate from the United States. We estimate that approximately 80% of these visitors have access to our community via the Going to the Sun Road. It is our opinion that the closure of this road for any period of time will have a very negative impact on our Tourist traffic, and therefore, a negative economic impact on our community.

1 We would request that a similar study be completed to allow alternatives to minimize the economic impact on businesses on both sides of the border.

Thank you for your contribution of our request.

Yours truly,  
  
 Melvin Tapp  
 Mayor

Town of Cardston—0694

1. Please see the responses to the letter from Senator Conrad Burns, as well as the new preferred alternative for “Preservation of the Going-to-the-Sun Road.”

COMMENTS

RESPONSES

0036 W

P.O. Box 1007 East Hill  
Seattle, WA 98101

**ACTION TRAVEL**

Chamber National Park  
10000 1st Avenue, Suite 100  
Seattle, WA 98101

Telephone: 425-867-2222  
Fax: 425-867-2222

August 24, 1998

To: Superintendent, Chamber National Park

From: Joe Coast

Re: General Management Plan



Thanks for keeping me on the mailing list for Chamber National Park. Although I don't get there as often as I would like I will get there soon. It is indeed one of the Crown Jewels of the Cascades.

My comments regarding the GMP follow.

Going to the Sun Road. I favor Alternative W. While there would be temporary inconveniences to commercial interests on both sides of the park I feel that getting the job done as quickly as possible would be in everyone's best interests. With the best case given to everyone it would seem probable that alternative solutions and ways could be developed to still bring people to other side of the park.

Preservation of Historic Hotels. The historic hotels should be preserved. Village Inn should be replaced with something more in keeping with Chamber Park theme. The whole Agate area is out of place and looks more like a Canadian townsite development through out history as well done as the Chamber expansion.

My suggestion for funding rehabilitation on the historic properties is to levy a special fee (\$4.95) on all accommodations, food services, and other recreational activities for a period long enough to cover the funds needed to get the work completed. Since historic Inn is not open this one would not even be responsible to the vast majority of travelers, especially if the use were expanded to the visitors.

Overstated Signposting. My least favor Alternative W but certainly W may be the best option. Use of the Overlay to the West Corridor should be stopped.

Increased watercraft. Alternative W is the preferred alternative. There are more than enough lakes in the area to satisfy the needs of present watercraft users.

Action Travel—0036

1. The method you mentioned, which can be referred to as a resort tax, was considered but rejected during the creation of the draft document, as described under "Funding Strategies for Rehabilitating Historic Hotels and Services" in the chapter on alternatives, ideas, and strategies considered but rejected.

1

COMMENTS

RESPONSES

Whether you... I prefer Alternative 'A'... because that park... construction... as soon as to repair... before this park... Perhaps some temporary... might be... available for... of locations such as Lake McDonald and... Glacier.

2. Divide Creek... Flood Hazard. The plan does not detail any... damage to the... structure... it would appear that this is not a high priority... I would suggest... all... from you... as they become available.

3. West Side... Visitor Center. A Visitor Center... needs to be built on the west side. The present... facility is a joke. I feel that... Alternative 'W' is the best... &... partnership with... and... would... be... The facility should be outside the park entrance.

West-side... While not... in the... I feel that... that should be... for all visitors. Presently... arriving by... over... are... I do not... but I feel that... in all... They... a large number of... They... are... at all... Why!

I appreciate... in... Good luck in getting all these things implemented.

- 2. Divide Creek flooded in 1987, 1991, 1995, and 1997. Damages included primarily the costs of severing and then repairing the Going-to-the-Sun Road to prevent floodwaters from destroying the bridge over Divide Creek. Other costs included those for maintaining the existing dikes, repainting flooded buildings, and staff overtime costs during flood emergencies. The park has not calculated the costs associated with these emergencies. When life and the environment are at stake and hazardous materials may be present, waiting until the facilities become obsolete is not an acceptable alternative.
- 3. Partnering can be an effective way to stretch limited dollars. Multiagency visitor centers in other areas of the West have successfully provided "one-stop shopping" for regional information. Before the process began for this plan, the park worked with the U.S. Forest Service and various other agencies to develop a multiagency visitor center, but no consensus was reached. During this planning effort, the U.S. Forest Service indicated that it was not interested in such a cooperative visitor center, and neither has a private organization suggested a combined facility. Glacier National Park staffs the Alberta Visitor Center about five hours a day during the summer and makes an average 5,000 visitor contacts annually, far less than the 190,000 contacts with people who visit Apgar Visitor Center.





COMMENTS

RESPONSES

0464

October 6, 1978

Supplemental Bulletin  
Resource Management Planning Office  
Climate National Park  
Wild Climate, Division 2000

Dear Supplemental Bulletin,

The following plan is submitted as the recently released Resource Management Plan (RMP) and Environmental Impact Statement (EIS) for Climate National Park. We are a diverse group of citizens who share the same concerns for the park, its resources, and the future of the park.

1

Climate National Park is a special place. It is a place of natural beauty, scientific interest, and historic significance. We strongly support the development of a management plan for the park that will protect its resources and provide for the enjoyment of future generations. We believe that the plan should be based on the following principles: 1. The park should be managed as a natural area, with minimal development. 2. The park should be managed in a way that will protect its resources and provide for the enjoyment of future generations. 3. The park should be managed in a way that will provide for the enjoyment of future generations.

2

We are pleased to support the plan and to be part of the process. We believe that the plan is a good one and that it will provide for the enjoyment of future generations. We are pleased to support the plan and to be part of the process. We believe that the plan is a good one and that it will provide for the enjoyment of future generations.

Climate National Park is a special place. It is a place of natural beauty, scientific interest, and historic significance. We strongly support the development of a management plan for the park that will protect its resources and provide for the enjoyment of future generations. We believe that the plan should be based on the following principles: 1. The park should be managed as a natural area, with minimal development. 2. The park should be managed in a way that will protect its resources and provide for the enjoyment of future generations. 3. The park should be managed in a way that will provide for the enjoyment of future generations.

  
American Lands Alliance  
Portland, Oregon

American Lands Alliance—0464

- 1. Please see response 2 to the letter from the Friends of the West. [0370]
- 2. Please see the general response regarding wilderness. Also please see the responses to the comments of the Montana Wilderness Association and The Wilderness Society.

COMMENTS

RESPONSES

Endreik, Ghilini, Eng  
Piedmontese Company  
San Francisco, California

Richard Berger, Eng  
Piedmontese Company  
San Francisco, California

David A. Chalkley, Eng  
Kinnell Electronic Services, Inc.  
Kinnell Falls, Oregon

Allen Nelson, Eng  
Oregon Policy Research Council  
Eugene, Oregon

David Maxwell, Eng  
Piedmontese Company  
San Francisco, California

Chalmer Vran  
Vran Group  
Kirkland, Oregon

James Schaefer  
Wickham  
Menlo Park, California

COMMENTS

RESPONSES

0127



**American Resource Management, Inc.**

P.O. Box 131146 Birmingham, Alabama 35213  
205-972-6840 • Fax 205-972-6856

September 11, 1994

GH-2423 Project  
Glacier National Park  
West Glacier, MT 59936-0423

Since 1994 I have been working in Glacier National Park and the Knappe(?) area at least four times a year. Since that time my job has allowed me to travel all over the United States. I have never seen a better area that has been carefully preserved. I hope you're cautious on that subject.

I have reviewed the draft management plan for Glacier National Park and would like to offer a few suggestions. I would like the final plan to include the following:

- provisions that would less permit, restrict and helicopter strokes in order to preserve natural sounds
- replace existing outdoor lighting to prevent vision of the night sky
- develop a public transportation system to reduce congestion
- develop a well site visitor center outside park boundaries

I also urge that you carefully study the Scenic and Historic Resources Act before passing any additional visitor area such as rehabilitating Lake McDonald Lodge and providing more roads.

I appreciate the opportunity to present my suggestions and ideas. Thanks for the hard work and sacrifice to protect Glacier National Park. It is the greatest park in the United States.

Respectfully,  
  
William J. Fricke

American Resource Management, Inc.—0127

1. The plan addresses all of your concerns except replacing outdoor lighting. Preserving the night sky is addressed in the park's *Resource Management Plan* (NPS 1993b).

COMMENTS

RESPONSES



John T. Cropp  
Corporation Director

November 24, 1982

Superintendent David A. Mills  
Gleason National Park  
West Glacier, MT 59064

RE: General Management Plan and Draft Environmental Impact Statement

Dear Superintendent Mills:

American Whitewater endorses the Draft General Management Plan and Draft Environmental Impact Statement issued by Gleason National Park. American Whitewater has several comments on the proposed future management of Gleason National Park.

American Whitewater is a non-profit organization that was founded in 1967 to work on national whitewater issues. We have over 7,000 members and more than 100 affiliate clubs, representing over 45,000 non-commercial whitewater paddlers. Our mission is to promote and protect America's whitewater resources and to enhance opportunities to enjoy them safely.

American Whitewater is in favor of the prohibition on the use of personal watercraft, motor launch by the main route jet ski, on the waters of the Gleason National Park (GNP). Many members of American Whitewater paddle in GNP on a regular basis. Personal watercraft, impact those qualities that attract our members to GNP in the first place.

The NPRA Organic Act gives the National Park Service the authority to regulate use within the GNP. The NPRA of GNP is not obligated to accommodate every recreational activity and in the past has limited or suspended recreational activities that are neither resource based, or that impact park resources and values. Jet skis pollute the air and water, threaten public safety, endanger park values, and destroy natural quiet.

American Whitewater supports the proposed ban on motorized use over GNP. Motorized use serves a small minority of the public yet impedes the park experience for all other users and impact wildlife. The Going to the Sun Road provides sufficient opportunities for the hundreds of well as young and old to fish in the waters of GNP. Motorized use is a prohibited use of Park Resources and therefore are subject to special use regulations by the NPRA. Furthermore, and

Conservation and Access Programs 441 Electric Avenue, Bigfork, MT 59911  
Phone 406-837-3355 FAX 406-837-3356 jcropp@3j.com

COMMENTS

RESPONSES

American Whitewater  
Page 2

exceeds air levels are considered in future permitting regulations by GNP in project park management for the general public.

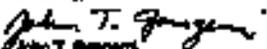
1

American Whitewater respectfully requests GNP impose limits on decibel levels for motorized trail on McDonald Lake and on Mary's Lake. This trail will not emit a motor noise but rather decibel output from the engine. Excessively high decibel levels interfere with wildlife reproduction and diminish visitor enjoyment. The state of Montana imposed a decibel standard for Flathead Lake. Either of new stringent levels need to be imposed for trails in GNP.

2

American Whitewater respectfully requests GNP reconsider expansion of public transportation on the Going to the Sun Road. American Whitewater recognizes the historical and cultural significance of this road in park history. We do not feel that expanding pull-outs will solve the congestion problem short or long term in the transportation corridor. The GNP/CRS priority develops the status of public transportation on the road as a means of reducing congestion. The number of visitors to GNP is undoubtedly going to increase over the 20 year period of the GNP. Additional pull-outs will quickly become obsolete if not so already that resulting in the same congestion problems apparent today. In addition, a public transportation system can adapt to changing numbers over time thus enabling the public to experience the historic value of GNP while leaving safety and protecting the natural resources. Any number of strategies could be developed to make a cost effective public transportation system. These strategies could include incentives to increase use of the transportation system such as discounts on entrance fees for park visitors not using a car on the road system. GNP could establish an hourly or daily quota for private vehicles on the Going to the Sun Road that visitors would be required to use the public transportation system once the quota was met.

Feel free to contact us should you want to discuss these matters further.

Sincerely,  
  
John T. Sargent

American Whitewater

1. The Code of Federal Regulations has decibel limits on all motors in all national parks.
2. Public transportation was not dismissed; it is addressed under the preferred alternative for "Visitor Use on the Going-to-the-Sun Road." Also please see the responses to the letter from the governor of Montana.

COMMENTS

RESPONSES

0995



Office of the Superintendent  
GMP Planning Office  
Glacier National Park  
West Glacier, MT 59906

November 24, 1998

Dear Superintendent:

Thank you for the opportunity to comment on the Glacier National Park Management Plan and Draft Environmental Impact Statement (DEIS). American Wildlands is concerned about how the Management Plan recognizes visitor enjoyment of the various natural resource areas. The plan, and other conflicting aspects of the Park is to "recover the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner as will leave them unimpaired for the enjoyment of future generations." The Current Management Plan (CMP) stresses an visitor enjoyment and traditional visitor use while largely ignoring the existing status and management of natural resources.

1. Prior to making these management decisions, GMP managers must identify visitor carry capacities. This information is needed to determine visitor needs and impacts. American Wildlands urges Park managers to delay making a decision on these management issues until a visitor carrying capacity is ascertained.

2. **Wilderness Management**  
Perhaps one of the most serious problems with the CMP and DEIS is the Park's change in management for proposed wilderness areas. Approximately 90% of the Park has historically been managed as wilderness and 1,299 acres as potential wilderness, as required by the 1964 Wilderness Act and the 1974 Wilderness Reauthorization. Glacier's 1,013,572 acre landscape includes 581,294 acres of proposed wilderness (57% of the Park), 1,398 acres of potential wilderness, and approximately 43,884 acres of unclassified land, all of which are currently managed as de facto wilderness (CMP State of the State Report, 1997). The policy on wilderness management is stated "It is NPS policy to manage proposed wilderness as wilderness until such time as the land is either formally designated as wilderness or formally rejected by Congress" (CMP, p. 149). Therefore, the "Current Philosophy for Managing Glacier" is clearly incompatible for its inclusion of the word "wilderness" and its failure to comply with NPS policy to manage proposed wilderness as wilderness.

3. Instead, the Park has been divided into six well-known geographic areas ... [redacted] ... divided into six management areas. The four management areas include visitor service, day use, rustic, and backcountry. We would like the management direction for each of these areas

AN RAIN FOREST SPURRY, BLAKE J. BAYNE/ALMA, BENTONIA BOWLE  
Tel. 408-264-8773 • Fax 408-268-7042 • E-Mail: [AW@wildlands.org](mailto:AW@wildlands.org)



American Wildlands—0995

1. Please see the responses to the comments of the Friends of the West. Also please see the description of what a general management plan is and is not in a white box under "Why a General Management Plan Must Be Prepared" and the section describing future plans and studies that has been added to the final document.
2. Please see the responses to the letters from the Montana Wilderness Association and The Wilderness Society. Also please see the summary of public comments and responses on wilderness.
3. By definition, unpaved roads in the rustic zone would not be paved in the future. The appropriate types of development are adequately described in the chapter, "General Philosophy for Managing Glacier."

COMMENTS

RESPONSES

3

*classified. For example, can proposed roads in the route area be paved? What types of development can occur in each area?*

4

*Management in these areas does not clearly indicate how proposed wilderness will be managed as wilderness. American Wilderness supports the existing management system, which was not addressed in the GMP, but can be found in the 1970 Management for Management which has been in effect since the 1977 GMP. Many Plans. This management system should have been addressed as one of the alternatives in the GMP and its creation demonstrates a lack of sufficient attention. National Environmental Policy Act (NEPA) regulations (40 C.F.R. 1502.14) require that agencies should objectively explore and objectively evaluate all reasonable alternatives. Similarly, case law has established that consideration of alternatives which lead to similar results is not sufficient to meet the intent of NEPA. Citizens for Environmental Quality v. United States, 731 F. Supp. 870, 889 (D. Colo. 1989); State of California v. United States, 850 F.2d 723 (9th Cir. 1988). Under NEPA, an environmental impact statement must contain a discussion of alternatives to the proposed action. The importance of this mandate cannot be downplayed under NEPA, a rigorous review of alternatives is at the heart of the environmental impact statement.*

5

*We are also concerned about the road change of Lake McDonald, Saint Mary Lake, and the road Going-to-the-Sun road corridor from "seasonal" to "winter service." These roads should be managed for their natural values.*

**Scenic Air Tours**

*American Wilderness supports the total and immediate prohibition of commercial sightseeing tours over GNP. As the GMP states, "Scenic air tours operating in backcountry areas where power and altitude have high value for visitors should be eliminated" (GMP, p. 62).*

6

*However, we do not understand with the following just cited in the Plan: "Forecasts have not proven that wildlife populations would be directly or indirectly affected" (GMP, p. 62). There is significant evidence cited elsewhere in the GMP that suggests that wildlife would indeed be affected. "The combination of unrestricted scenic air tours and unrestricted increases in scenic air tours would continue to have a wide range of impacts on wildlife. Impacts caused by aircraft overflights have been reported in the scientific literature. . . Studies and incidental observations have documented various effects of overflights on wildlife including physiological and behavioral responses (indicators of stress), accidental injury, reproductive failure, energy losses, and habitat avoidance and abandonment" (GMP, p. 147-8).*

7

*Clearly birds could be affected by occasional and increasing scenic air overflights, especially by helicopters. Throughout GMP, it has been documented that grizzly bears run away from aircraft flying at altitudes as high as 5,000 feet. Harding and Flory (1976) noted that grizzly bears never become habituated to aircraft, despite frequent exposures. Clearly bears have also been noted to cluster near to streams to avoid small and overflights, even when overflights are infrequent (McCune et al., 1974). In Glacier NP, bear research results indicate that helicopters used in the Park from 1982 to 1988 significantly affected bears. Nearly 80 percent of the grizzly bears observed in a certain section of the Park reacted strongly to helicopter presence.*

4. Please see the responses to the letters from the Montana Wilderness Association, the Friends of the West, and The Wilderness Society. Also please see the summary of public comments and responses on wilderness.
5. Please see the responses to the comments of Friends of the West.
6. We agree with your comment, and the black box you referred to has been changed to indicate that wildlife populations could be affected by aircraft activity. Thank you for the references you cited, which have been provided to the park's wildlife biologist for his use. Also please see response 10 to the comments of the U.S. Air Tour Association.
7. The administrative use of helicopters in the park is discussed under "Scenic Air Tours: General Aviation; Military and Other Aviation Activities". Administrative use of helicopters is subject to approval by the superintendent. Also please see the responses to the comments of the U.S. Air Tour Association and the summary of substantive comments on the draft plan in this volume, with our responses. The National Park Service does not expect to use helicopters to implement any of the eight preferred alternatives identified in volume 1 of this document. However, the details of how to implement all these preferred alternatives have not been determined yet. The use of helicopters would be evaluated at a later date. The park estimates that it averages less than 20 helicopter flight-hours per year for administrative use, excluding the years in which there are big fires and years in which there are intensive backcountry construction projects. Effects on wildlife from NPS helicopter use would be similar, but of considerably less duration, than those caused by scenic air tours. Also please see the chapter on environmental consequences.

COMMENTS

RESPONSES

7

The GMP proposes significant building construction and potential road work, road rehabilitation, and building reconstruction. Have you identified any need to shut into this work? We would like GMP scenarios to address the potential for impacts on the Park's natural, scenic, and historic resources and to address the impacts on wildlife populations. Query about construction, for example, required to move buildings and how anticipated. These needs must be evaluated in the GMP analysis. We believe that building use for Park purposes should also be considered in this overall plan and that the proposed alternatives need to consider this issue.

**General Watershed**  
American Wilderness supports the permanent, total prohibition of permanent watercraft on GNP watercraft. FWC are inappropriate for the purposes of GNP. We agree with the GMP's finding that "the use of permanent watercraft is necessary to pursuing a state of nature and pursuing recovery" (GMP, p.61).

8

**Interpretation and Habitat Use**  
Like permanent watercraft, interpretation is directly inconsistent with the purposes of GNP. We urge GNP managers to make permanent the current, temporary ban on interpretation.

9

**Accidental Wildlife**  
Accidental wildlife is exposed to the risk of injury or death from "leakage" of toxic substances from development projects in the winter months was not sufficiently analyzed in the DMR. We believe that the impact of increased winter use during winter months may significantly impact winter usage in the McDonald Lake area and other key winter habitat areas by wildlife.

The winter use (A.M. C) should be approved. The GMP's preferred alternative location for winter use. A winter use study should be completed before any of the GMP's proposed planning, facility construction, or vehicle use allowed.

10

**Divide Creek Flood Hazard**  
While the St. Mary facilities never should have been built in a floodplain, we are concerned about the cost of moving them if the end result is that stream channelization and widening due to the presence of facilities located on private lands adjacent to the Park.

11

**Park Facilities**  
Any new facilities, such as a recovery center and parking, should be located outside of the Park. There should be no expansion of existing facilities and the Park should consider the closure of some facilities if there are serious health and safety concerns. There also, information about a vehicle recycling capacity is needed. Separate air quality and water quality must be analyzed before any decision is made regarding the location of winter service and related activities in any habitat and recovery projects.

12

**Wintertime Off-Road Travel**  
The GMP indicates that wintertime conditions have not been included in all major strategies within the Park and that GMP is "one of the best strategies for gradually year wintertime off-road travel." A.M. is concerned to whether any of the developed facilities in the Park are seasonally impacting WCH habitat. For example, any of the trails contributing vehicles to key streams? Are there

- 8. Snowmobiles were permanently banned in Glacier National Park in 1975 and continue to be banned.
- 9. The National Park Service agrees with your comment about winterization of concession hotels, and this is not the preferred alternative identified in the document. Please see the changes that have been made in the "Winter Use" chapter. Also please see response 10 to the comments of the Montana Wilderness Association.
- 10. Our concerns are similar to those you expressed; however, for the National Park Service to continue to have residences, work areas, and other facilities in flood-prone areas would be inappropriate and a violation of federal directives. Please see the summary of public comments and responses later in this volume and read the responses on Divide Creek.
- 11. Please see the description of what a general management plan is and is not in a white box in the "Introduction." Also please see the section describing future plans and studies. In these studies, impacts on park resources such as wildlife and water quality will continue to be analyzed. National historic sites and the properties of the National Register of Historic Places will be retained in some form, as will visitor service properties.
- 12. We know of no problems with trout at this time. Should such problems occur, they would be dealt with according to current law, policy, and the management authority of the superintendent.

COMMENTS

RESPONSES

12

any problems with waste management from various sources in the area?  
**CTR Road**

13

The development options for the Going-to-the-Sun Road do not include a wide enough range of alternatives. Why did the GMP omit alternatives that consider shuttle systems? We disagree with the GMP's conclusions on vehicle use expansion. We do not agree with the need for additional pull-outs and parking lots. We believe that a carrying capacity study that be conducted for the entire area in the Park and that transportation management should be placed. Additional studies regarding the feasibility of mass transportation should be completed.

14

**Camas Road Closure**  
 Please explain why the utilization of the Camas Road was considered financially unfeasible when there are a number of programs (such as scientific, trail) that are the same expensive and far more financially unfeasible.

15

Thank you for considering these concerns. Glacier National Park provides some of the most scenic and important wildlife and fish habitat in the Northern Rockies. We would like to see a GMP that better focuses on protecting the natural resources in the Park and that is better prepared to address visitor use. The GMP Draft appears to be incomplete. Data is needed about visitor carrying capacity and studies are needed about visitor use to better inform decisions about development projects. We believe that supplemental EIS information is necessary before any decisions are made to further accommodate visitors and tourism development in the Park.

Please keep us informed as this program develops.

Sincerely,

*Eliza Davis*  
 Eliza Davis

- 13. A shuttle system is available in summer, and the preferred alternative for visitor use on the Going-to-the-Sun Road calls for assessing an expanded public transportation system for the park. Please see the description of what a general management plan is and is not, as mentioned in 1 and 11, above. Also please see the section describing implementation plans, as well as “Alternatives, Ideas, and Strategies Considered but Rejected.”
- 14. The removal of the Camas Road was an alternative that was considered but rejected for the reasons discussed under “Alternatives, Ideas, and Strategies Considered But Rejected.”
- 15. Please see responses 1 and 10, above.

## COMMENTS

## RESPONSES

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MIKE SCHALL: I'm Greg Schatz, Secretary-Treasurer. I'm representative of the Backcountry Horsemen of the Flathead. Backcountry Horsemen of the Flathead is one of sixteen chapters of the Backcountry Horsemen of Montana. Backcountry Horsemen of Montana have 12,000 members. Our local chapter represents approximately 150 families. Our primary goal is to perpetuate the common sense use of horses in the headless backcountry. We represent members who are committed to leave no trace light on the land philosophy of backcountry use.

Classic national week was established for the enjoyment of the American people. Because horse use is a legitimate and long used method of access to the park we are very interested in adding our comments to your public input process.

First, we are encouraged in the comments of your first proposal and this draft. While horse use was virtually ignored in the first proposal, it is at least acknowledged in this draft. In general, we support the concept of continued and liberal access to the park by a

MEMBER SERVICES 14061 869-4848  
P.O. Box 1182 Whitefish, MT 59907

COMMENTS

RESPONSES

40

1 wide segment of the public using stock, Historic Glacier  
 2 Park was by horseback and we feel it is still an  
 3 appropriate and effective way to use and enjoy the park  
 4 today. As you formulate and implement your new management  
 5 plan, we urge that there be enhancement of rather than  
 6 further restrictions on or curtailment of stock use.

7           There is a general perception among stock users  
 8 that over the years park management policies have made it  
 9 increasingly difficult to enjoy the wonders of Glacier Park  
 10 on horse back. In light of the proposed closure of  
 11 Going-to-the-Sun highway for a period of years, this seems  
 12 an especially appropriate time to encourage alternative ways  
 13 to access the park. In order to disburse use while the road  
 14 is closed, now is the time to make the Middle Fork area more  
 15 of a destination. We encourage you to improve the boundary  
 16 trail and provide facilities of all the ranger stations for  
 17 horsemen to overnight with their horses. Other measures  
 18 which would improve access for stock users and long ridges  
 19 include inspect and review your policy on grazing horses in the park  
 20 and appropriate areas such as the Belly River. There is an  
 21 enormous amount of available grass. By utilizing the  
 22 meadows correctly it would reduce the number of stock used to  
 23 carry in horse feed. We believe in using the least number  
 24 of stock necessary to carry our camps. Having to provide  
 25 all our horse feed results in additional stock being used in

UNKNOWN RECEIVING (404) 843-4828  
 P.O. Box 1182 Whitefish, MT 59937

Backcountry Horsemen of the Flathead (Greg Schatz)—0515

1. Mitigating measures will be addressed in further studies regarding the reconstruction of the Going-to-the-Sun Road.
2. Grazing is not allowed in the park because of the need to prevent off-trail damage and minimize competition for forage between horses and wildlife.

1

2

## COMMENTS

## RESPONSES

2	<p style="text-align: right;">05/16 41</p> <p>1 areas such as this which can easily support the grazing with 2 no negative impact to the resources.</p>
3	<p>3 Address the problem of parking areas for the 4 public stock users. As an example, the parking area for the 5 Hole-in-the-Rock Mountain Trail was recently reduced. As a result 6 of these improvements, where there were parking for four or 7 more trucks and trailers, now there's parking for two if one 8 party blocks the holding area. Stock access is being 9 further curtailed rather than improved. Provide better 10 opportunities for input by stock users on a day-to-day basis 11 not just when formulating your long-term General Management 12 Plan. We have ideas which would improve access, reduce user 13 conflicts and minimize resource damage. We are willing to 14 help improve the facilities by volunteering our labor and 15 knowledge.</p>
	<p>16 Thank you for your attention to our comments. We 17 hope that they will help you in your efforts to generate 18 imaginative planning that will preserve Glacier Park's 19 western classic park character with recognizing and 20 encouraging the historic use of horses. Thank you.</p>

3. The improvement of individual parking areas for stock users is too detailed a topic for discussion in this document; however, it will be addressed in subsequent planning efforts.



COMMENTS

RESPONSES



0925

Bicycle Federation of America—0925

10 November 1998

Supintendent  
Glauber National Park  
CROWTHER Road  
West Glacier, Montana 59726

Re: Comments on Draft General Management Plan (GMP)

Dear Sir:

This is in response to your invitation to comment on the subject documents. I have reviewed and enclosed both the General Management Plan Overview and the Draft General Management Plan Environmental Impact Statement (GMP-EIS).

Firstly, I'm very disappointed. This is not a second plan for the better management of one of the most scenic of our national park systems. I must strongly disagree that the National Park Service (NPS) go back to the drawing board on this matter.

By way of background, let me state that I am a former employee of the NPS (only that I have worked as an environmental policy analyst in the Office of the Secretary, US Department of Transportation (formerly, under DOT); and I am a certified planner, specializing in transportation.

Perhaps the most striking aspect of the Glauber National Park (GNP) EIS is the NPS's failure with defining the Going-to-the-Sun Road. The three alternatives contained in the EIS all provide for continued, unrestricted private motor vehicle access to the Road, with only cursory consideration of alternative and alternatives. Indeed, the GMP would lead one to think that the only significant activity for which the Park exists is driving up and down this road. With the statement that,

"The National Park Service would continue to manage the Going-to-the-Sun Road as the premier motor suspension for Glacier National Park."

There is nothing to either the NPS Organic Act or in the 1994 legislation establishing Glacier National Park that suggests during this road or a quarter for opening and preserving the park. Road, neither as such road existed. In fact, this "premier motor suspension" has only been opened for the past 65 years (or much of a premiere when compared to the real significance of this unique natural resource.

1306 23rd Street, N.W. • June 200 • Washington, DC 20036  
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COMMENTS

RESPONSES

Page 2

1

The NEPA seeks to justify that proposed exceptions on driving into road as being (1) to preserve regional and local resources (CEQP p. 42), and (2) "as directed by the public" (CEQP p. 44). I believe that this priority is not consistent with the plan establishing the Park and the NEPA, and should not be the primary focus on the Park's management plan.

2

All text located in the CEQP, under the heading "Alternatives, Ideas, and Strategies Considered but Rejected," is a single reference to the alternative which proposed to "limit access along the Going-to-the-Sun Road to transit system only..." (CEQP p. 62). Apparently, no serious assessment of this, or variations such as limiting access to through traffic and using transit for up-and-back travel, was made.

3

Paragraph 3 would state that the NEPA document will, excluding "private vehicle use" does not appear to include bicycling. Throughout the CEQP bicycling was referred to as a "hobby" or a "recreational" use. The NEPA section "Private Vehicle Use" does not include bicycling (CEQP p. 42). Should I conclude that the NEPA believes that bicycling use in this National Park is more acceptable with the preservation of the resource than is bicycling? The NEPA should take a more active position in recommending bicycling use on the roads in the Park.

4

In conclusion, I believe the CEQP EIS should be rejected as presented and that a new assessment, including a broader range of alternatives should be conducted. The EIS did in its assessment of the National Environmental Policy Act in its search, as it does not consider all alternative alternatives to the restricted use (and closure) of the Going-to-the-Sun Road (and the Park) by unrestricted private motor vehicle use. The new assessment should avoid the bias of the current effort by deciding that driving in the Park is the primary use of the resource and give greater attention to finding alternatives that accept private and public vehicle opportunities and enjoyment, while better preserving the natural qualities of Grand Teton Park.

Thank you for the opportunity to review and comment on these documents.

Sincerely,

Bill Williams, AICP  
Executive Director  
Miyoko Protection of America  
Washington, DC

1. We disagree with your statement.
2. The idea of limiting access to a transit system was seriously considered, as was explained in *Newsletter 3* for consideration by the public. The concept also was explained under "Alternatives, Ideas, and Strategies Considered but Rejected." From the responses that were received to that newsletter, there appears to be little public support for the concept of limiting access along the Going-to-the-Sun Road to a transit system only.
3. The Going-to-the-Sun Road was completed in 1932 and has subsequently been designated as both a national historic civil engineering landmark and a national historic landmark, as was mentioned on page 43 of the draft document. As built, the road is far too narrow to add a "cyclists only" lane, and adding such a lane by widening the road would destroy its historic character. Bicycle use on the road is restricted only between 11 a.m. and 4 p.m. from June 15 through Labor Day. The restrictions apply only to the western side of Logan Pass. In spring the park takes a number of specific management actions to accommodate cyclists, including opening the Camas Road, the inside North Fork Road, and the upper sections of the Going-to-the-Sun road to cyclists and hikers only before they are opened to vehicles.
4. We believe that the *Environmental Impact Statement* meets the spirit and intent of NEPA, was not biased, and evaluates a reasonable range of alternatives.

## COMMENTS

## RESPONSES

017

To: Superintendent Glacier Park  
 From: Marilyn Olsen, Big Wild Advocates  
 Re: General Management Plan Draft  
 To be made part of the public record.



1. Retain existing wilderness zones and the exact definition of what that means.
2. No new facilities, no expansion of existing facilities, maintain the existing management philosophy to develop outside the park. In-park development takes business away from towns & gives it a corporate concarness and diminishes the wild character of the Park.
3. No re-zoning of wilderness.
4. No wintering of the concessionaire's hotels at the public expense.
5. Ban jet, chis & personal watercraft.
6. Ban scenic overflights.

Marilyn Olsen for Big Wild Advocates  
 P.O. Box 318  
 Coeur d'Alene, Montana 59507

Big Wild Advocates—0893

Thank you for your comments.

COMMENTS

RESPONSES

Division of RV & Campground  
OFPA

September 2, 1988

Office of the Superintendent  
Camp Planning Office, Glacier Park  
West Glacier, MT 59904

re: Death Management Plan

Dear Superintendent,

1

I have read the abstracted version of the management plan. I am disappointed that so much money was spent to find out what local people already know—Brew's only past work concerning Glacier, and it is hardly new! Yes, there should be some intensive geotechnical studies on Going-to-the-Sun Road. Many portions of the road need fixing—why are we waiting to do the whole thing? I suggest we target specific areas that need immediate focus along the steep embankments of Glacier Park and let them be bid first. Why are we spending millions on lower roads when there are critical areas at higher elevations?

2

I also believe that joint construction with private bus lines from 7 P.M. until 4 A.M. should be the primary target. Businesses will be irreversibly hurt by closing the road for 2-30 years. City grants indicate that night construction is done throughout the country—why not here?

It's also essential not be talking and writing as if Glacier National Park and Wolfenbut are one and the same. Though both were formed as a national backbone site for number statistics, I feel, we must first take care of Glacier and secure what a national park is in American terms.

My guests have several constructive comments:  
1. Mountain parking is major barrier which allows the dog visitor to stop, take pictures, and leave—Are there allowed to leave their own dogs and take up animal control?

2. Is there a more organized way of "hiking" the Park other than the Junior Ranger?

3. Could there be more available for a reasonable fee? Dogs to be available, for instance?

4. Don't forget Park concessions in the winter. This is truly a matter of money and a specific portion funds needed for winter. They it is more costly to buy and make individuals responsible for taking care of that?

Thanks for listening.

Sincerely,



Greg L. Brown  
Canyon RV & Campground  
Box 7  
Strategy House, MT 59919

Canyon RV and Campground—0586

1. We are targeting specific high priority areas for repair in fiscal years 1999 and 2000.
2. Night closures undoubtedly will be considered in the pending engineering and economic study of the Going-to-the-Sun Road. Also please see the new preferred alternative (A1) in the section "Preservation of the Going-to-the-Sun Road."

## COMMENTS

## RESPONSES

CONTACT BILL BUCKLEIGH & WILDLIFE INFORMATION CENTER  
General H. Moyman Schmeckel, Medical Superintendent

Dave Mifflin  
Superintendent  
CHAPLIN Project  
Glasier National Park  
West Glacier, Montana 59936

October 23, 1998



Dear Superintendent,

I am writing to include additional comments on the Glasier National Park General Management Plan. I strongly support the construction of the Westside Discovery Center and Museum, and it should be located inside the park at Apper.

The reason I support this facility is one lesson from the University of Michigan, Penn. State and Eastern Michigan University along with the Center for Wildlife Information here studies show that over \$100 million is spent annually giving the public the impression that it is all right to approach, feed, touch and interact with wildlife. These inappropriate messages are leading to increases in human and animal confrontations resulting in serious injury and sometimes death to both.

The Discovery Center not only would serve as an interpretation center to enhance visitor experience while at Glasier Park, it could also serve as a focal point to emphasize the appropriate safety techniques for enjoying the wildlife safely and responsibly. The Apper location would reach the maximum number of visitors and would also reach them at a time when they may be more receptive to sustainability messages.

If the Center was located outside of the Park, it would serve as an anchor such like anchors that are found in sleeping quarters (such as BEARS) which would lead to more growth along Highway 2 and would also create problems for adjacent Forest Service land. It would also be less user friendly for interpretive programs taking place inside the Park. Glasier National Park is not an island. Activities and developments that are served outside the Park will impact the habitat and wildlife throughout the ecosystem.

All these and more visitors arrive uneducated or misinformed on how to relate to wildlife responsibly, the need for several education messages even greater. The Westside Discovery Center can play an important role in giving them the guidance they need to be stewards of our wildlife and wildland resources.

Sincerely,  
  
Chuck Buckleigh

Center for Wildlife Information, P.O. Box 13, West-Park, Department

Center for Wildlife Information—0263

Thank you for your comments.



COMMENTS

RESPONSES

1

2

1 The draft NIS secretly changes wilderness to some  
 2 rustic and dry use but mostly changes 94 congressional  
 3 study wilderness to backcountry lands. Wilderness has been  
 4 removed and is not mentioned or defined.

5 I wish to read your Department of Interior's policy  
 6 that explicitly states, quote, "backcountry is not a  
 7 specific management zone." chapter 2, page 3. I called the  
 8 DC policy office this morning. This policy is in force and  
 9 affect. This is the bible that is supposed to be used in  
 10 park service management.

11 Why isn't it being used? The draft NIS fails to  
 12 disclose the park's existing zoning map. Even the statements  
 13 for management in affect since the 1977 Master Plan. The  
 14 park must comply with NEPA and park policy by disclosing and  
 15 maintaining the existing zoning conditions. Removing  
 16 wilderness zoning and definition violates the park's own  
 17 policies: chapter 2, pages 7 and 9; chapter 4, pages 3 and  
 18 4; and chapter 5, page 1. Likewise, changing Lake McDonald,  
 19 Mt. Mary Lake and Going-to-the-Sun Road corridor from  
 20 natural to visitor services zoning violates Interior  
 21 management policies for the Park Service. And I quote, "New  
 22 development zones will be established only after considering  
 23 alternative sites including locations outside the park,"  
 24 chapter 2, page 6.

25 The park is secretly opening the door for major

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 P.O. Box 1182 Whitefish, MT 59907

1. Please see the responses to the letters from the Montana Wilderness Association and the Wilderness Society, as well as the general response regarding wilderness.
2. Please see the responses to the comments of the Friends of the West. We also would like to point out that Director's Order No. 2, issued in May 1998, eliminated the requirement for statements for management and revised the process by which parks are zoned. The zoning system described in the "Statement For Management" is no longer in accordance with policy.

COMMENTS

RESPONSES

1 development inside the park such as the new motel and fast  
 2 food restaurant they have planned. The CCP opposes the 1982  
 3 development concept plan for Lake McDonald Historic  
 4 District. This DCP is outdated and no longer valid. The  
 5 park has historically been managed for development outside  
 6 the park. Based on the park's own park services policies,  
 7 historic management philosophy should be retained to  
 8 honestly keep it like it is. Maintaining park services policy  
 9 should appropriately be implemented to achieve keep it the  
 10 way it is.

11 We support the existing ban on jet skis and the  
 12 need for regulation of helicopter flights.

13 CIP, Inc. opposes the park's DCP for Lake McDonald  
 14 Historic District. The draft DCP simply includes the  
 15 development plan for new winterized motel, fast food  
 16 restaurant, massive new parking lot within a historic  
 17 district as an addendum in the bibliography.

18 We again espouse no new development inside the  
 19 park. Maintain existing management philosophy to develop  
 20 outside the park. Business development inside the park  
 21 takes business away from local economy outside the park.  
 22 The visitor center proposed in the development area above  
 23 the T near Agate would be an exception because it is in  
 24 development zone.

25 We oppose the draft DCP plan to winterize the

COCONINO MOUNTAIN (408) 843-4700  
 P.O. Box 1122 Whitefish, MT 59907

COMMENTS

RESPONSES

28

1 concessional hotel for winter use at public expense. Use  
 2 annual businesses outside the park instead of new business  
 3 development inside the park. There are probably 50 or more  
 4 businesses to buy goods outside of Glacier from the canyon  
 5 to Whitefish, Kalispell. We don't need a foot-in-the-door  
 6 snack shop at Lake McDonald that would compete with local  
 7 businesses.

3 8 We support the cultural plan for Going-To-The-Sun  
 9 Road that is not discussed in the draft NIP. Any new  
 10 construction should fully comply because Going-In-The-Sun  
 11 Road is on the National Historic Register and is a historic  
 12 landmark. I was up there Sunday, and I noticed that the new  
 13 gravel and sand masonry is non-historic. One mode of masonry  
 14 is being built one place while another historic mode at  
 15 Kalispell. These should be consistent. As an example of  
 16 application of the cultural plan.

4 17 Also, since is the Advisory Council on Historic  
 18 Preservation comment? This agency comment should be in the  
 19 draft at this point. Major additions to Going-to-the-Sun  
 20 Road may constitute adverse effect to the historic road and  
 21 need to be evaluated as required by law.

5 22 The draft NIP shows no evidence whatsoever of a  
 23 need to shut down and completely rebuild the  
 24 Going-To-The-Sun Road. Continue incremental repair. If  
 25 emergency funds are needed, go after them in a timely

CONROY CORPORATION (406) 863-4428  
 P.O. Box 1184 Whitefish, MT 59907

3. Please see the responses to the comments in the letter of the Coalition for Canyon Preservation, below.
4. Please see the letter from the Advisory Council on Historic Preservation, (first letter in the "federal agencies" group, above), and the responses thereto. Also please see the letter from the Montana State Historic Preservation Office (in the "State Offices" category, above) and the responses thereto.
5. Please see the responses to your organization's letter, just below.

COMMENTS

RESPONSES

		0577 21
	1	Emergency road repair funds are available under DOT
	2	and Federal highway regulations. Too much delay is
	3	unreasonable and may be a negligent excuse to shut down the
6	4	road. The EIS should consider the possible adverse effects
	5	of using excessive dynamite in the spring time causing
	6	possible road failures and damage.
	7	Thank you for the opportunity to comment and be
	8	heard. CDF, Inc. requests immediate implementation of
	9	existing park service policies to replace the improper
	10	explosive scheme shown in the draft EIS, pages 19 through 40.
	11	Retain and disclose existing policy.
7	12	Another point is on the draft EIS, pages 44 to
	13	46, seven laws requiring compliance are listed. The park
	14	statement for management lists 19 such administrative and
	15	legal constraints. Let's get the other 12 back on the table
		where they belong. Thank you very much.

6. The park takes tremendous care not to damage the road during spring opening, and we do not believe that road damage occurs from blasting. Volume 1 of this document contains a discussion of the potential for water quality degradation to occur from blasting if appropriate mitigating measures are not taken. The potential effects of blasting will be considered in subsequent NEPA analyses regarding road reconstruction.
7. Please see the responses to your organization's letter, just below.

COMMENTS

RESPONSES

1160

**Coalition for Canyon Preservation, Inc.**  
 P.O. Box 422  
 Hungry Horse, Montana 59919-0422  
*Dedicated to the Protection of the MONTANA Scenery*

November 30, 1998  
 District # 004-001 000

Superintendent, Glacier National Park  
 West Glacier, MT 59936

RE: Draft EIS for General Management Plan (GMP)

Dear Sir,  
 Please enter these comments into the official public record:

The Park's Alternative to close GYAR to through traffic (p.20) is not supported by KIM Mackintosh (p.2), the 1997 "Restoring Wall Inventory Update" prepared by DOT/FRWAA. This "update" analysis (see 43 CFR 1.362.14,1501.8(b)(iv)) is critical to EIS and does not recommend shutting down the road to through traffic as proposed by the park. In fact, to the contrary, the report verifies:

- \* "Only ten (10) walls were identified that needed major structural work" (p.3).
- \* "More significant is that study is full closure of the road needed. One last chance structure need only be considered for wall construction." (p. 5).
- \* "(52) retaining walls out of 110 "have some evidence of stability problems" (p. 1).
- \* "The majority of the walls need at least updating of the stone masonry joint in the joint joints" (p.5). "Repairing is a repair effort that will lengthen the life of the stone masonry walls and significantly reduce costs if done in a timely manner... Repairing need not be a great hardship to traffic." (p.5).

What would be the "need" for the park's Alternative A to shut down GYAR (p. 20), an option, response never before mentioned in the EIS process (not during official Scoping nor in MOW/Federal Register as required)? CCC supports Alternative C - continue working as prescribed in DOT/FRWAA's 1997 "Restoring Wall Inventory Update & Summary Plan of Repair Needs" (Dec. 23, 1998).

EIS walls were a cheap federal legislative requirement and local contractors that nearly in Glacier Park demonstrated in "Contractors" section (pp.202-203).

Coalition for Canyon Preservation (11/30/98)—1160

1. We have updated information in volume 1 of this final document to address the points and concerns you mentioned.
2. The preferred alternative for "Preservation of the Going-to-the-Sun Road" has been changed in this final document.
3. The list in the "Compliance" section was not intended to be exhaustive. The opening paragraph on page 259 of the draft document indicated that the National Park Service would "comply with all applicable laws and executive orders, including" the ones listed. This section has been expanded in the final document.

The information you refer to about asphalt dumpsites, RV sewage dumping, and seeps is incorrect, and this is beyond the scope of this *General Management Plan*.

1  
2  
3

COMMENTS

RESPONSES

3

**A complete listing of applicable laws is discussed in the park's *Statement for Management* (1988, 1990) although the new "Wild and Scenic Rivers Act of 1990, PL 101-681, needs to be added. All should be listed in DEIS for accuracy including State Water Quality laws that prohibit RV sewage dumping into an old 1961 drainfield at Avalanche (the park's current proposal) and State law requiring dumpsites such as Idaho County to be State Certified (Idaho County is the park's existing illegal septic dump site inappropriately located in steep adjacent woods).**

4

**DEIS Plan to use Avalanche for a "closure point" where all wasteable visitation will terminate if BTRM is closed (i.e. KHI is a serious concern caused by over sensitive conditions's club habitat that is already significantly impacted by road and fire-related). The park's Avalanche Parking Facility EAP/DEIS project is currently in Federal District Court, CV 98-04-M-DWM. Although Avalanche is essentially removed from the GMP EIR, this action proposed to use Avalanche Campground as a "closure point" for all wasteable visitation constitutes yet another very significant adverse effect of overuse and dumping to the very old growth forest. The overuse problems at Avalanche are well established in the Administrative Record provided to the Court and do not include this new proposed additional very significant adverse impact. Where will all the wasteable visitors go to the toilet? Where will they park and camp? What will be the environmental consequences of this new proposal that are not yet addressed? NEPA applies to these "closure point" proposals on both sides of the park because they result in adverse traffic congestion, trampling, increased need for toilet facilities, and other significant adverse effects.**

5

**New Management Plan for DEIS from 19-001 available website UNDER NPS Management Policies (DEIS use, 2-1-2000/10/1). The DEIS essentially changes existing zoning from its visitor services/development zone. The entire OTM corridor including Mt. Hood and St. Mary Lake is changed from primarily natural to visitor services, thus allowing future unlimited development inside the park. The park has historically been managed for development outside the park (see 1977 Master Plan DEIS). This DEIS severely and improperly violates the park for interior development while violating UNDER NPS Management Policies on the matter in multiple ways. Further, "New development zones will be established only after considering alternative sites (including locations outside the park and locations outside areas with significant natural and cultural resources). 2-8.**

4. Please see the changes to impacts under "Impacts of All Other Alternatives" for "Preservation of the Going-to-the-Sun Road." Avalanche will be addressed further in additional studies on the reconstruction of the Going-to-the-Sun Road.
5. The zoning system described in the *Master Plan* is no longer in accordance with NPS policy. Furthermore, the *Master Plan* and the *Statement for Management* are public documents. This plan does not identify "new" development zones.

There was extensive public involvement throughout this planning process. The draft version of this document was sent to approximately 1,000 individuals, agencies, and organizations, and the *Draft Overview* was sent to more than 7,000 individuals and organizations. Throughout the planning process we also heard from more than 4,000 members of the public. Also please see the responses to the comments of the Montana Wilderness Association, Friends of the West, and the Wilderness Society.

COMMENTS

RESPONSES

6

The draft EIS recently changes wilderness to some "basic" and "day use", but strictly changes 21% congressional study wilderness to "backcountry" zone. "Wilderness" has been removed and is not mentioned nor defined (DREI, p. 20-21,30,33,34). Please refer to the Wilderness Act for definitions and to USDOC NPS Policy that explicitly states "Backcountry is not a specific management zone" (B3), congressional study will be managed as wilderness (S-1); management zoning is "prescriptive...four primary zones will be identified (wilderness is a natural outcome)" (S7) as shown in the park's Existing Zoning that was not attached to DREI.

7

How consistent is the plan multiple DREI proposed alternatives based upon several scenarios: (1) Alt. A (more visitor use facility development all along CITR, p. 46) to a natural zone recently changed to development; and, (2) Alt. A (opening the Lake McDonald Lodge Historic District parking lot for "adding (on) the road" and winterizing accommodations' comparison for an extended winter "snow" facility, p.67-68, as a "foot in the door" for the park's major winterized hotelparking lot that food restaurant DCP plan was on the back burner, 1991c,p.279). The DREI recently changes the Historic District zone to development zone. All Historic zones have been dropped. How arbitrary and capricious activity. What is responsible for this unilateral description?

8

DREI fails to discuss the identification issues raised by the public in Critical Issue Scoping.

The DREI fails to discuss and respond to the noted scoping issues raised by the public during scoping phase of this EIS conducted from 1994-1996 pursuant 40 CFR 1504.7(1)(5)(4); 1508.12.

The DREI provides one paragraph of discussion about results of the scoping phase on p. 5: "Over 2,300 comments were received -- the general tone of most of those first observations favored limited growth in the park...Glacier is a distinct wild area that must be preserved...". The Park made no summary and analysis of the significant issues and alternatives raised by the public in actual EIS scoping that proceeded to proceed to the opposite (DREI narrows wilderness zoning and resource control Park corridor for development). Please refer to paragraphs 1 & 2 to review significant issue analysis, the content of the public EIS Scoping file at park headquarters, conducted by CCP Research. The CCP research first noted public file on this EIS scoping has preserved and not destroyed as was shown for the Transportation Plan.

9

This EIS is essentially a political document with a political agenda accomplished when Republican Senator and constituents became involved later in the Newsletter 3 process (the park presented preposterous alternatives study based on environmentalists in order to get a

6. Please see response 5, above. As was previously stated, this plan was not done in secret, nor do we, as park managers, engage in any calculated deceptions. Glacier's proposed wilderness was discussed on pages 13, 108, and 109 of the draft document. Proposed wilderness was an assumption from the beginning of development of this plan. The zoning system does not change proposed wilderness in Glacier.

7. Like the proposed wilderness designation, historic districts were an assumption. The zoning system does not change these designations or the types of actions that can or cannot be undertaken on historic properties and districts. The discussion on page 20 of the draft document addresses this. The cultural resources, including the national historic landmarks and historic districts, are described on pages 136-145 of the draft document.

8. Newsletter 1 documented the issues raised by the public during scoping. Newsletter 2 disclosed to the public which issues would be addressed in the General Management Plan and Environmental Impact Statement and which ones would not, thus identifying the significant issues. An analysis of the issues gathered from scoping was done; this is contained in the park files, which your organization has already requested and reviewed. It was this information that you used to do your own significant issue analysis, which was attached to your letter as exhibit 1. However, please note that the "Critical Issues and Alternatives" section has been changed in this final document to address your concern. Also please see the "Public Involvement" chapter.

We would like to correct an error in the exhibits that were attached to your letter. You have assumed incorrectly that scoping ended July 28, 1995. To the contrary, scoping did not end at that time, nor did the National Park Service ever send out anything that said scoping had ended. Because the scoping process is used both to initiate public input into an EIS process and to identify issues to be addressed, and since issues can be brought up at any point in the process for the agency to consider, scoping never really ended on this project until the release of the draft document.

9. Thank you for sending us another copy of the Coalition for Canyon Preservation's "significant issue analysis". The fact that the National Park Service does not analyze issues in the same way that your organization does is not an indication that we did not do an analysis. All the comments received during the development of the draft and final General Management Plan and Environmental Impact Statement are on file at Glacier National Park.

COMMENTS

RESPONSES

prodevelopment self-interest consistency). And that led to the "gutting" of the park's 95% congressional study wilderness (discussed at pgs. 13, 14; removed from new zoning at pgs. 19-40) while the park has been severely reduced for singular development (p. 31 - central corridor changed from unimpaired existing primary "natural" zone to "visitor service/development" zone). See Exhibit 3 - The park's Existing Management Zoning was not discussed in CEIS in spite of extensive public scoping comments supporting this existing zoning (Exhibit 2).

10

Meanwhile the park destroyed the public record for the 1990 Transportation Plan and the stress to rebuild Glacier proceeds.

11

Throughout the DEIS preparation, the Park Superintendent has spent considerable time at the Governor's Office in collaboration (six weeks last summer) and will now be working for Montana's Republican Governor as a Natural Resource lobbyist during upcoming 1990 Legislative sessions being held by USNCA/NPS. Parliament politics are out-of-control and have "taken over" the park administration, are manifested in the politicized CEIS (while actual EIS scoping issues and over a dozen Federal legal comments were dropped) -- an unethical and unlawful "conflict of interest" causing multiple serious adverse effects to the Federal natural resources of Glacier National Park. USNCA/NPS policies and procedures on proper "conflict of interest" and other matters such as zoning need application.

12

DEIS violates 40 CFR 1500.16 and 40 CFR 1500.24 where Environmental Consequences Section must have scientific and statistical basis for assumptions of significance.  
 The Env. Consequences section of DEIS (pgs. 1-15-246) provides no basis for comparison and fails to refer to "explicit references by footnote to scientific and other sources used for EIS evaluation". EISs shall be supported by evidence that agencies have made necessary environmental analysis, 40 CFR 1500.3(a). Apparently, EIS reviews are supported by data derived from reports of self-serving interests that contain no scientific comparisons or scientific references whatsoever. Please refer to ATTENDANCE in review agency responsibility in EIS process in these matters.  
 The EIS should be completely and appropriately revised to meet NEPA procedural requirements. When are scientific sources for comparisons? When is a comparative chart where comparisons can be made by reviewers? When are the Environmental Consequences analysis for the most meaningful going to be discussed and reviewed in comparative form with some honesty and scientific references? Who on the list of Proponents (p. 295) is responsible for this intentional deception (the need to revise Existing Zoning was extensively scoping and identified as significant)?

10. The planning process for the 1990 *Transportation Plan* began in 1988. Public involvement did occur. All comments were considered to complete this plan.
11. Your assertions regarding Superintendent Mihalic are misleading, distorted, and false. This type of developmental detail is common throughout the government. Superintendent Mihalic's detail was approved by the assistant secretary for policy and budget, U.S. Department of the Interior.
12. No significant issues or federal legal constraints have been dropped or dismissed in this document. The list in the "Compliance" section (page 259 in the draft) clearly states that it is not meant to be an exhaustive list (see response 2, above). The "Summary of Alternatives" and "Summary of Impacts" tables can be found just before the divider for the "Affected Environment" part of the document. A number of references are cited throughout the "Environmental Consequences" section and listed in the bibliography. In addition, appendix H (new to the final document) lists a number of sources that were consulted regarding road reconstruction. The document was edited according to NPS *Editing Guidelines*. The methodologies used are appropriately referenced throughout the document.

COMMENTS

RESPONSES

**"Summary of Impacts" (unemployment, pp. 26-28) is self-serving, irrelevant, without analytical basis or substance and is unrelated to the historic resource values. Examination**

\* The park proposes major new developments to add new parking or parking areas along the GTSR, toilet facilities, picnic areas and benches (pp. 44-45) with a consequent new design character for the historic road - all consistent with new award-winning from "natural" to "visitor services/developments" (Exhibit 3 and DEIS p.31). The park admits "These facilities could be intrusive on park values" (p. 44) which makes obvious what it means parking, rest-a-palooza, & picnic area strewn out all along GTSR. Thus, simultaneously, the park's self-serving rationale for all this development, without any analysis whatsoever, concludes in the contrary: "minimal adverse impacts" (p. A11, p. 36). Moreover, "no action" (maintaining "natural" scenery and no new obstructive facilities) would somehow be an adverse effect! This type of confusion and dishonest doublethink is pervasive throughout DEIS and does not meet NEPA requirements for scientific and accurate accuracy and information of high quality" (see APPENDIX).

13

**"Summary of Impacts" is irrelevant and question-begging**

\* The CCP challenges the park's contention that adding dozens of major changes to the historic Going to the Sun Road (GTSR) can be "mitigated through design" (p. 96). The CCP challenges the park's new plan to have the Landscape Architects for these designs also perform the cultural compliance review | USDOC NPS Management Policies require an interdisciplinary review in these matters (1989, p. 9-1). The park is currently proceeding with building pseudo-historic masonry in areas where it never existed historically (Apache segment 1998) and built totally non-historic masonry masonry design at Otisville overpass last summer. The park currently does not have a matching design merit for masonry as required by the park's current Cultural Management Plan for GTSR (1989) that has been actively studied from the DEIS!

14

The existing 1989 Cultural Management Plan for GTSR is not mentioned (in Bibliography, Index, or text) in form and effect based on consultation and experience around the National Historic Transportation Act. This DEIS actively eliminates and fails to disclose & oblige the 1989 GTSR Cultural Plan and the 1998 Transportation Plan both of which are legally in force in effect. Moreover,

15

- 13. We believe the "Summary of Impacts" table accurately reflect the impacts that are discussed in the "Environmental Consequences" section.
- 14. We do not agree with your comment. All work done on the Going-to-the-Sun Road will continue to be done in such a way that its significance as a national historic landmark and the contributing elements to that designation will be preserved.
- 15. The "Cultural Resources Plan for the Going-to-the-Sun Road" is listed in the bibliography. The Glacier National Park *Transportation Plan* (NPS 1990d) is cited in the draft document on pages 46 and 292.

COMMENTS

RESPONSES

16

without any analysis or historic consultation whatsoever on the matter, the DEIS is trying to tell us that GTRM, a National Landmark and Historic Site, can be completely changed and somehow retain historic status (which isn't believable). In other words, the park site is completely rebuilt, after the end, design of the GTRM was established essentially to be removed from historic and landmark status, a possible adverse effect that would be significant.

**Alternative A to extend Visitor Kiosk along the Going-to-the-Sun Road (see 31-02-06.BA.FD) violates USDOC NPS Management Policies. This preferred alternative is based on the secret recording of the GTRM written from "Original" to "Visitor Services/Development" which explicitly violates USDOC NPS Management Policies (1998, pg. 217): "New development zones will be established only after considering alternative sites (including locations outside the park and locations outside areas with significant natural and cultural resources)." The DEIS has argued by (1) failing to discuss Historic Zoning Management - see Exhibit 3; (2) failing to apply USDOC NPS management zoning prescriptions; and, (3) failing to apply USDOC NPS management policies requiring consideration of alternatives for new development areas as cited above.**

17

**Under the Alternative B (see 31-02) fails to consider adverse impacts of Lake McDonald Historic District in Impact Statement (numbered p. 30)**

**Under the Alternative B (see 31-02) fails to consider adverse impacts of Lake McDonald Historic District in Impact Statement (numbered p. 30)**  
This DEIS preferred alternative is an unexcused "foot in the door" to scotch the park's current development concept for a \$20 million visitation of Lake McDonald Lodge, new motel and fast food restaurant construction and a massive new parking lot in the middle of a Historic District (see DEIS Bibliography p.292, 1991c). This is another "phony FONSI" similar to Avalanche that was dropped in 1992 because the park couldn't justify such modern massive development in the midst of a historic area that now has been successfully restored with DEIS secret recording in "Visitor services/development" (compare Exhibit 3 with p. 31). Historic zoning for sites listed on the National Register of Historic Places is provided in USDOC Management Policies (1998, p. 217).

18

The DEIS argues by (1) failing to apply NPS national or historic zone prescriptions to Lake McDonald Lodge development; (2) by failing to apply USDOC Policy requiring "New development zones will be established only after considering alternative sites (including locations outside the park and locations outside areas with significant natural and cultural resources)", p. 217; and, (3) by failing to mention the area is an Historic District.

- 16. The intent of the document is to protect the integrity of the Going-to-the-Sun Road as a national historic landmark. Please see the discussion in the black box on page 50 of the draft document and the revised text in the corresponding black box in the final document.
- 17. We have not erred. Please see the responses above, particularly response 5.
- 18. Regarding your point (1), the draft document did not err; the cultural and historic designations of properties and places in the park still remain. The new zoning system does not change those designations. As for point (2), no new areas in the park have been identified for development; therefore, no new development zones have been created. Existing developed areas have been rezoned as visitor service zones. Please note that (3) the Lake McDonald area was identified as a historic district on page 138 of the draft document. Also please see response 5, above.

COMMENTS

RESPONSES

**Response to "most-of-the-rest" Impact Report analysis prepared by DENR for winter use of Lake McDonald Historic District facilities (p. 514)**

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<p>* adverse safety impact is ignored. The Park is promoting an obvious safety hazard &amp; safety conflict with GTSR traffic "provide more skiing and snowshoeing opportunities ... using the area" (p.68).</p>
<p>* physical impact of providing increased opportunity for vandalism of Historic Lodge is ignored. The park proposes to close the Lake McDonald parking lot "the day use of the parking area ... a facility to provide storage" (p. 67,68). There is no "need" for a storage area - there are dozens of storage sheds within the park. Instead, the parking lot will be open access for vehicles to a district of historic facilities and buildings. "The effects on cultural resources" is obviously false. If park admits to "increased vandalism to private properties" (similar to the Lodge) then Lodge itself is at increased risk.</p>
<p>* All. A discussion fails to mention and discuss that Lake McDonald is a narrow critical wildlife wintering area (p.68). The "Wildlife Considerations" section for this DENR is obvious - reworded to read "provide winter access to narrow ski area" which is such as Lake McDonald, and other historic and important (p. 53).</p>
<p>* The park proposes wintering Lake McDonald completely for winter recreation (skiing and snowshoeing) "in order to make using the trails in the area" (p. 68). Since then what? What trails in the area (Mt. Brower apply)? The park is providing for a new winterized facility for park recreation (existing equipment would be winterized). Then what, where would everyone go? Tramping through the closed Lodge District facilities to access the ski area? Or trails leading to private ski area facilities? On the GTSR road competing with traffic? The park should explain exactly what recreation opportunities are reasonably available, if any, other than private parking for "storage" in a closed historic district in a winter ski area with need as winter access for recreation and winter hold water.</p>
<p>* Lack of "Need" - There are ample opportunities for winter recreation and access outside of the Lake McDonald Historic District just outside the park utilizing the existing businesses. This DENR practice is failing to recognize the fact that development inside the park simply takes business away from the local economy outside the park.</p>
<p>* Trampling of the ski area and riparian areas is a predictable adverse impact of promoting winter use at Lake McDonald Historic District not mentioned in Impact Summary (p.68). The park's "no adverse impacts" conclusion for increased winter use for Lake McDonald Historic District is premature, arbitrary and capricious.</p>

19. The road will be closed to vehicles in the winter at Lake McDonald Lodge.
20. An additional passage regarding vandalism has been added under "Impacts of all the Preferred Alternatives."
21. Please see response 20, above.
22. There are wildlife wintering areas all over the park. The discussion on page 68 of the draft document and the reference to St. Mary was only an example; it was not meant to be exhaustive. The park contains no critical wildlife wintering areas officially designated by the U.S. Fish and Wildlife Service.
23. Please see the revised preferred alternative for "Winter Use."
24. The provision you objected to has been removed from the alternative.
25. Trampling was addressed on page 199 of the draft document.

COMMENTS

RESPONSES

26

All pictures supporting expansion of visitor use at Lake McDonald is unacknowledged and self-serving (p.88).

\* DEHS narrative discussion and impact analysis on increasing use at Lake McDonald Lodge parking lot fails to mention this area is a significant Historic District listed on the National Register of Historic Places.

**Glacier Ethnology has been omitted from "Interpretive Plan" - Appendix B (p. 266)**

\* "The tribes (with excellent use rights) still consider Glacier to be a spiritual place" (DEHS, p. 4). The words of the original Bitterroot treaty confirmed what has now been known, and/or written "under the sun" in the DEHS ("Our Relations are Our Fathers", p. 253). Glacier National Park is a site of origin for religions that is very old for 5,000-10,000 years before white men. Glacier Park is a sacred spiritual place with very old geology of origin and over 100 visible spot sites. Going to the Sun means going to the Creator Sun, or going to God. This is the spiritual and religious meaning of Glacier. This cultural significance should be interpreted and should be top on the list (not confined to Bessie Hill). Glacier Park is completely comprised of two major 1855 Indian Treaties - Treaty of Hellgate on the west, Judith River Treaty on the East, both give tribes excellent use rights and have clauses to protect the resources should public land law fail. This information should be rightly disclosed. Any new exhibits or museum should fully discuss Ethnological information on the Indian Treaty and USDOU NPS Management Policies should be applied on the matter (1988, p. 211).

27

The NPS Region has wrongly kept the Ethnology study "under lock and key" for years. The CCP has had an ongoing NMA Request for well over a year with no response, yet this document is referenced in DEHS Bibliography (p.297); and important Ethnology issues appear to be misrepresented in the DEHS. What changes in Ethnology report are being made by NPS? Why is release of the report being held back, secretly reviewed by NPS and withheld in an attempt to ignore Ethnology from GLEP? How long is NPS going to delay compliance (1980 cultural amendments to National Historic Preservation Act) which unequivocally has been widely dropped from BNS-Contingency section (p. 299)?

Wilderness, cultural, and native religious law intertwine here at the heart of Medicine Country. As outlined in the Wilderness Act, "An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primitive character and influence, and without permanent improvements." 16 USC 1131. This is Glacier National Park.

- 26. The Lake McDonald Lodge Historic District was discussed on page 142 of the draft document.
- 27. The ethnology study is cited in the bibliography of the draft document. It has been in final editing and is now available upon request.

COMMENTS

RESPONSES

28

**DNES incorrectly creates an unscientific and misleading term "ecosystem" for Glacier's Wilderness and Interpretive Theme (p. 12, 283)**

Fragments of this EIS have presented a political and promotional agenda that started by the Sept. Last administration, the "Crown of the Continent Ecosystem". This misrepresentation of Glacier's history is now being wrongly presented as an Interpretive Theme in OIEP. Contrary to the statement made on p. 283, "Crown of the Continent" was geographically defined by George Bird Grinnell, "the father of Glacier Park", in 1901. George Grinnell explored this region in the late 1870's - his description in Century Magazine (Sept. 1901) approximates the true boundary of Glacier Park. Waterton Park is not "Crown of the Continent", nor is the Bob Marshall Wilderness or Great Bear Wilderness directly to the south of Glacier (the EIS fails to mention or discuss the Great Bear Wilderness).

"Crown of the Continent" in Glacier National Park see pp. , not the overall area as stated on page 12, 283 and throughout the EIS. EIS proposals should stop trying to pervert and re-write Glacier Park's history and significance.

29

**DNES incorrectly labels the NCD GBE, the "ecosystem" of Glacier**

DNES proposals have gone out of their way to avoid the actual management ecosystem of recent, the Northern Continental Divide Grizzly Bear Ecosystem, which is not discussed in the EIS. The NCD GBE is the Grizzly Bear's last remaining recovery zone in the lower 48 states that is contiguous to adjacent habitat in Canada. Glacier Park occupies about one-third of the wilderness core of the NCD GBE (see Exhibit 1) along with the Great Bear, Bob Marshall and Scapegoat Wilderness Complex. During Scoping for this EIS, EDO started a petition to rename the NCD GBE, the "ecosystem" of recent, as "Glacier Park". Instead, the petition refused to discuss and describe it in an arbitrary and circular manner. Meanwhile, only 3 persons identified the new promotional "Crown Ecosystem" as significant during Scoping, and this concept has wrongly replaced NCD GBE, the significant official recovery "ecosystem" of legal record. This scenario violates the terms of applicable

30

NEPA regulations at 40 CFR 1503.6(a) whereby "An agency interested in (EIS) shall consult and consider comments both individually and collectively". The proposals of this EIS have repeatedly completely ignored substantive issues submitted in public form (409 signatures supporting "No Fast Food" at Lake McDonald Historic District was also considered) passed as a scoping issue, but continued to be very relevant.

31

The DNES carefully omits any mention whatsoever of the NCD GBE that should be included in "Regional Cooperation" section of the EIS (p.75-9

- 28. We realize that the term "crown of the continent" has been used in different ways throughout history. The statement on page 285 of the draft document correctly reflects a commonly accepted use of the term; no change has been made.
- 29. The Northern Continental Divide Grizzly Bear Ecosystem is mentioned on page 112 of the draft document.
- 30. We do not agree. Significant issues were identified in *Newsletter 2* and then again in *Newsletter 4* as the issues this plan would address. The petition received on "No Fast Food at Lake McDonald" was considered but was determined to be too detailed for this document to address. The document merely indicates that a restaurant is appropriate at Lake McDonald. How fast or slowly the food is delivered is too detailed for a general management plan.
- 31. Please see response 29, above.

COMMENTS

RESPONSES

31

**79) not observed. The DEIS barely alludes to the Grand River Escarpment Plan (p. 183) while carelessly failing to mention its necessary "ecosystem" of record. The NCTO GMP has recently been omitted from the "Executive" section of EIS (p. 183-186).**

32

**Federal Agency lacks additional study to respond to "substantive comments" on EIS - 91 CFR 100.64 (a)(2)(i)  
 "All substantive comments received on the draft statement ... should be attached to the final statement ...". This can be in the form of a separate document released with the EIS, or included as an appendix. Disclosure is the intent and purpose of NEPA. The informed concerned public, tribes, and agency officials should be able to review the specific substantive comments and year specific responses, not some biased non-partisan self-serving summary. As a matter of record, the CGP's recent substantive NEPA comments (not certified) on Avonlea EA and GMP EIS November 1 were completely ignored with no criticism of responses in summary whatsoever, a pattern of arbitrary and capricious activity where agency officials refuse to recognize procedural duty and responsibility prescribed by law, regulations, policy and guidelines.**

33

**Threat of Non-fire Weeds was wrongly dropped from GMP EIS. The public clearly identified non-fire weeds as a significant issue during Scoping (see Exhibit 1). The "Increasing Threat to the Integrity of the Glacier ecosystem is the invasion and spread of (12) non-native species plants", 1991 Exotic Vegetation Management Plan. (Green wheat? Non-fire weeds is not listed in the Index or the Bibliography and is given minimal mention (p. 126). The DEIS does mention "Most species occur in disturbed areas such as roadsides, construction areas...", but somehow, this known "threat" to native plant communities in Glacier has not been assessed in impact evaluation for development. More evidence that significant issues identified by the public in scoping were completely ignored. More evidence that common and analytical accuracy is not being applied to impact evaluations as required (see ALEBENTCUM).**

34

**THE DEIS HAS WHOLEHEARTLY 'SHIPPED' THE TRANSPORTATION PLAN FROM PARK MANAGEMENT  
 After a 7-yr planning process, the Final Transportation Plan was signed off and issued in January 1991. The valid traffic management goal was to get large RV's and excess vehicles off the historic road during peak traffic months (July and August) during peak traffic hours. The Plan called for traffic management... Large RV's reduce the road's ability and corridor capacity. None of this was included in the public notice EIS/CEQ EIS.**

- 32. This volume, volume 2 of the *General Management Plan and Environmental Impact Statement*, contains agency responses to substantive comments on the draft document.
- 33. Please see pages 126, 177, 178, 199, 235, 236, and 237 in the *Draft General Management Plan and Environmental Impact Statement*.
- 34. We appreciate your support of the 1990 *Transportation Plan*. It will remain in effect until completion of the additional studies on the Going-to-the-Sun Road.

COMMENTS

RESPONSES

34

Again in 1991, the public overwhelmingly supported the existing Transportation Plan during meetings (see Exhibit 1 and 2). The public supported the need for a suitable suitable bus parking area (a necessity that now has been dropped from the DEIS West Side Discovery Center proposal). Meanwhile, at Arvonia's perfect opportunity in Federal Court, the park completely ignored overwhelming public comments in support of implementing a suitable bus/Transportation plan, and instead, went ahead with a proposal to electrically impact a size and adversely impacted old growth forest with a parking facility that is US 87 and large Tour Bus parking.

35

The GMP EIS Newsletter didn't mention the Transportation Plan and it was obvious that new park leadership was attempting to revisit this now 1991 plan narrowly to force and effect. Then, at GMP Newsletter 1 questions, the park misrepresented the plan in obvious effort to get a "quickie" review it presenting it without credible bus or vehicle information. Then, during GMP EIS process, CCP research discovered the park had destroyed the public file for the Transportation Plan. More arbitrary and capricious activity.

36

**GMP DEIS projections were Questionable (p. 288)**  
The trend has stabilized under is going down. Meanwhile, the DSC projections are being made without taking the slow and world economic events in consideration. Examples:  
(1) "(Montana) Legislature voted of economic slowdown - predict 35% chance of recession in 1999" by Director of MIT Bureau of Economic and Economic Research GEP, 11/14/98.  
(2) "(Internationally known) "Economist: Montana may forget attracting new industries - (local, state business owners need to focus on small businesses that can jump into the global market", *Montanan*, 10/24/98.  
(3) "Economist (State Dept. of Labor and Industry): Numbers show the same recovery", GEP, 10/21/98.  
(4) "Predictions would be a mistake... Despite the series of investment-size cuts in stores from the Fed, the U.S. economy is slowing down", GEP, 10/21/98.

37

Director Service Center (responsible for the projections) is in disregard ignoring the global economic factor, and, located in Chicago when the economic are extremely different than in Montana. All this is even more reason for NPS to proceed with extreme caution with your plan to shut down CTRR, which should not happen because this extreme economic was not included in the NEA in Federal Register for the EIS as required by 40 CFR 1508.12(a). The serious adverse effect to the local business and small business outside the park has been seriously understated.

- 35. All general management plans have the option to revisit current plans.
- 36. The projections on page 280 of the draft document are not out of line because they take into account national and local economic downturns and upturns over the past 20 years. Although actual visitation has fluctuated, the trend shows an overall increase. The works you have cited do not change the analysis. Based on the best available information, the economic impacts were adequately addressed.
- 37. The National Park Service is conducting further study on reconstructing the Going-to-the-Sun Road. The alternatives in this plan have been rewritten. The issue of the Going-to-the-Sun Road reconstruction arose during development of the *General Management Plan* and the National Park Service made extensive efforts to talk with the public about this issue. It is not required that all issues be aired at the beginning of the planning effort, although we agree that it is preferable. New issues can be raised at any point in the process, and the agency must decide whether or not to address them [see guidance on scoping by the Council on Environmental Quality, 40 CFR 1501.7 (7)(c)]. To meet the spirit and intent of NEPA, the National Park Service chose to involve the public early in the process of developing the plan. The notice of intent informed the public that all aspects of managing Glacier National Park were being considered as part of the GMP process. At the time the notice was issued, no alternatives for park management had been developed. Through this process, it was determined that managing visitors on the Going-to-the-Sun Road and rehabilitating the road were connected actions that needed to be included in the plan (40 CFR 1508.25). Senator Burns and the National Park Service had a public hearing on the Going-to-the-Sun Road rehabilitation three months before the draft document was released, at which time alternatives were discussed. Before the draft plan was released, the public hearing was followed by presentations to chambers of commerce, an additional economic study by the University of Montana, and a congressional field hearing conducted by congressman Rick Hill.

COMMENTS

RESPONSES

**Re: DEIS.** The extreme alternative of shutting down OTRB (DEIS, Alt. A, p. 49-50) did not appear in this process, and as a result, DEIS responses and amendments contain multiple NEPA procedural violations that circumvented the Federal Register and Scoping [40 CFR 1508.22(a); 1508.5(d); 1501.7]. Respectfully submitted,

*Sharon A. Willmet*  
Sharon A. Willmet, Certified Legal Assistant  
Administrative Law, Research Coordinator CCP, Inc. 9919-0422.

- Exhibit 1 - Scoping graphs & NCD GBE map
  - Exhibit 2 - Scoping survey on zoning
  - Exhibit 3 - Glacier Park's Existing Management Zoning
- NEPA Reqs - APPENDIX*

COMMENTS

RESPONSES

0638



Superintendent Mitchell  
Glasgow Park  
West Glacier, MT 59909



November 8, 1998

Dear Superintendent Mitchell,

Cold Mountain, Cold Rivers is a non-profit environmental and human rights group based in Missoula, Montana with members in Montana, Washington, Oregon and Canada. Cold Mountain, Cold Rivers is committed to working with communities throughout the Northern Rockies and the Pacific Northwest to protect our region's natural ecosystems and wildlife.

On behalf of our members, we would like to make specific suggestions to help protect, preserve and enhance the natural wonders, wildlife, and wilderness of Glacier National Park and surrounding areas.

First, we believe it is imperative that you implement existing Park policy that requires Wilderness to be managed as Wilderness, which covers 60% of the Park.

Second, we feel it is equally important to retain existing Historic and National designations within the Park. We oppose changing the Going to the Sun Road corridor from "natural" to "visitor services" which would destroy peak meadows through continued development schemes. Special attention should be given to Lake McDonald and St. Mary Lake for their natural and scenic values.

Third, we oppose policies that allow for motor boating and jet skis on Park lakes which introduce pollutants into fragile ecosystems. Furthermore, the Park needs to research and quantify the impacts that motorized use has on aquatic species and the ecosystem themselves.

Fourth, we oppose any new development schemes such as the Park's Development Concept Plan for the Lake McDonald Historic District (a new winterized motel, fast food restaurant, massive new parking lot, etc.). Such tourist amenities are best kept outside the Park system.

Finally, the Park needs to consider first and foremost a philosophy and programs that serves wildlife; that protects the natural wonders of the Park; that provides for clean air, water and soil; that perpetuates the wilderness character of this magnificent country; that preserves the biological diversity of the Park system; and otherwise addresses the inherent issues for which the Park was created.

Sincerely,

David Geist, President  
Cold Mountain, Cold Rivers

Cold Mountain, Cold Rivers—0638

Thank you for your comments.

COMMENTS

RESPONSES



ME

AREA CHAMBER OF COMMERCE  
P.O. BOX 312 • Columbia Falls, MT 59912 • (406) 893-8372

November 24, 1998

Mr. Bob's Fendley, Superintendent  
EHS/ERS Project  
Chamber National Park  
West Glacier, MT 59936

RE: Glacier National Park General Management Plan

Dear Mr. Fendley,

Thank you for this opportunity to comment on the Glacier National Park General Management Plan. From our review of the General Management Plan Overview the Columbia Falls Area Chamber of Commerce National Development Committee has the following comments and recommendations:

1. We appreciate your listening to our and other comments from the original Draft Management Plan and GMP. Your "overview" presents a much more visitor friendly and visitor accommodating plan than we saw with the final proposal in the GMP.

1

2. We are very concerned about the Going-to-the-Sun Road reconstruction project and the concerns expressed in your letter on our location related to the project. We believe that expanding access for the west side of the park, providing visitors alternative park activities other than driving the Sun Road, will serve to reduce negative economic impacts for the local tourism businesses during the reconstruction period. Our recommendations for this expanded access are as follows:

2

A. The North Park Road should be paved to the Cassin Creek entrance. The Park Service should work with the Federal Highway Administration and the Forest Service to make this access improvement. This would provide an alternative loop on the west side of the Park for visitors to enjoyably experience.

Columbia Falls Area Chamber of Commerce, (11/24/98)—0982

1. Please see the responses to letter from the mayor of Columbia Falls.
2. The management of the North Fork road outside the park is an important issue, but it is beyond the scope of this plan.

COMMENTS

RESPONSES

3

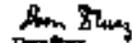
B. The inside North Fork Road should be upgraded to gravel which will provide visitors some accommodating access to Bowman and Kintla Lakes.

C. In your "Plan Overview" the mention covering the West Side Discovery Center and Museum, we believe Alternative A which propose construction of the facility inside the Park is an excellent plan. We especially like the proposed location (north of the T-Interception of the Going-to-the-Sun and Crown Roads) for it would accommodate our proposal to pave the North Fork Road to the Crown entrance, providing another superb attraction to the loop on the Park's west side.

3. Concerning search air tours we believe the Park Service should initiate some involvement in creating air space which is under jurisdiction of the Federal Aviation Administration. Routes that provide such tours while by existing guidelines for over flights of the Park and additional restrictions are necessary. The exact priority and quantity of these helicopters could prove, if needed, beneficial to the Park for supply transport or in emergency situations.

Many of our Chamber members depend heavily upon park visitors and will need as many visitors as possible during the Sun Road construction period to survive. Please seriously consider implementing our comments and recommendations into your final draft of the Park's Management Plan.

Sincerely,



Dawn Stuey  
Dawn Stuey  
Chairman

Chairman, Park Area Chapter of Concerned  
Recreation Development Committee

cc: George Conrad Blane  
Senator Max Baucus  
Congressman Rick Pitt  
Governor Mark Martin

- 3. The inside North Fork Road is zoned rustic. Rustic roads are intended to provide a slow-paced, quiet, uncrowded experience similar to that experienced by early park visitors who came by automobile. The park's gravel roads to both Bowman and Kintla are periodically resurfaced and graded.

COMMENTS

RESPONSES



P.O. Box 113 - Columbia Falls, MT 59717 - (406) 892-2273

1132

November 27, 1998

Glacier Project  
Glacier National Park  
West Glacier, Montana 59936

RE: Draft General Management Plan and Environmental Impact Statement

Dear Sirs:

We are writing this letter in response to the draft plan released in August of this year. The historic health of the tourism community relies on the revenue generated by visitors to Glacier National Park. In past years late opening dates for the Sun Road has delayed visitor travel - some are now facing the possibility of extended road construction which will, in essence, translate to the visitor as "stranded". We would like to offer the following suggestions for consideration:

- 1. 

1) Remove all references to the Sun Road and its reconstruction out of the Draft General Management Plan. This will be a one-time major effort and not part of the 20 year plan. It was not included in the final plan issued in 1997 for public review.
- 2. 

2) We recognize that the Road needs repair. However, the effort must be one that is expeditious and which minimizes the use of construction tools, technology and practices. Consider incentives to keep the construction projects on track in terms of completion date and within budget. Utilize local materials to reduce environmental impact, take advantage of technology and products which will complement and expedite the effort.
- 3. 

3) Increase public interpretation in the form of tours and interpretive signs into and around the Park. We recommend that the North Fork Road be paved to the west entrance of the Park at Canyon Creek. The Camp to Apper section was maintained in 1998 and this would be a natural extension to enhance visitor access and open up an alternative view to the Park. This improvement is necessary to provide a viable accessible route to Bowman and Birch Lakes instead of the deteriorating rough gravel road which requires travel emergency equipment and procedures. These areas had developed into very attractive recreational opportunities if only the woods were improved.

Columbia Falls Area Chamber of Commerce (11/27/1998)—1132

- 1. The reconstruction of the Going-to-the-Sun road is a long-term issue as well as a short-term issue. There was no "initial plan issued in 1997 for public review." *Newsletter 3* contained ideas expressed at the 12 open houses that were conducted to gather information with which to begin developing the *General Management Plan*.
- 2. The preferred alternative for "Preservation of the Going-to-the-Sun Road" has been rewritten as alternative A1 in volume 1 of this final document.
- 3. The preferred alternative for visitor use on the Going-to-the-Sun Road calls for assessing an expanded public transportation system for the park.
- 4. The North Fork Road is outside the park boundary and outside the scope of this plan.

COMMENTS

RESPONSES

5

4) It is extremely important that publicity of the proposed closures – for whatever time period it might be – be transmitted as part of a non-cooperative play. Visitors are using the Internet to a greater degree and are using the resources to plan their vacations. Use the Internet as a positive tool to inform prospective visitors that the Park is open and there are plenty of opportunities for a wonderful vacation. Develop a promotional plan which presents alternative routes, trailheads, and hiking areas in a positive light.

Members of the Columbia Plateau Area Chapter of Congress are invited directly or indirectly from visitors to Ellyser National Park. We urge you to take into consideration the extreme seasonal impact this effort will have on their businesses. We hope that you will take our concerns into consideration. Ellyser National Park is a gem in our landscape and one which we work to preserve for future generations.

Sincerely,



Elly Ellyson, Chairperson  
Tourism Committee

5. After the additional studies on how to reconstruct the Going-to-the-Sun Road are completed, we will continue to use the Internet to provide information to the public.

COMMENTS

RESPONSES

D885

CDS

November 18, 1994

Superintendent  
CDS-00206 Project  
Gleason National Park  
West Glacier, Montana 59936

Dear Rickie:

Thank you for this opportunity to comment on the draft General Management Plan and Environmental Impact Statement for Gleason National Park. I was pleased to participate in the hearing held in Ephraim, MT on October 24, 1993 and wanted to follow up with a letter. As I mentioned in my testimony, I believe the draft Plan is an outstanding document. It is reflective of the broad range of comments and issues that were brought to light during the last few years in the course of the planning process. Particularly, the guiding principle to support the need to preserve those qualities which are inherent in the Glacier experience and the management philosophy acknowledges the hope that we can "keep Glacier the way it is". However, keeping Glacier the way it is will require careful management of the Park's resources, both natural and cultural.

1

I wholeheartedly support the Plan's preferred alternative for the preservation of historic hotels and visitor services. I would, however, suggest that this alternative adequately encompasses all of the park's historic structures, including ranger stations and other out buildings (e.g. the circular building at Packers' Point, etc.), roads and trails. I would further suggest that the interpretive value of these sites be enhanced. For example, the lodges and ranger stations could house temporary or permanent exhibits which portray the history of Gleason Park and its development. As an illustration, signs at Lake McDonald Lodge in the early 1970s, I added many questions from visitors regarding the history of the building at Lake McDonald and how early visitors experienced the Park.

2

I would also suggest that the Plan address a wide variety of funding strategies which might be employed in financing the costly operation of the lodging facilities in the Park. The section entitled "Alternatives, Issues, and Strategies Considered but Rejected" includes some funding sources which might ultimately play a role in the financing solution. I urge you to consider their potential role in achieving the preferred preservation alternative. Identifying them in this early life to recognize that it will likely take a variety of funding mechanisms to complete and preserve these most significant structures. Recent problems with infrastructure facilities in Yellowstone National Park demonstrate the funding needed for the rehabilitation of park structures in not so very distant.

With regard to placing signs surrounding the preservation of Going to the Sun Road, I would

Community Development Services of Montana  
804 West Columbia • Butte, Montana 59701 • (406) 728-7583

Community Development Services of Montana—0885

1. All the park's historic structures, including national historic landmarks, national register properties, and properties eligible for listing on the National Register of Historic Places will be preserved in accordance with the 1916 Organic Act and sections 106 and 110 of the National Historic Preservation Act. Many of these structures are adaptively used, which helps to preserve them. Your idea of installing exhibits in these buildings will be considered in the future.
2. Please see the revised text of the preferred alternative for "Preservation of Historic Hotels and Visitor Services."

COMMENTS

RESPONSES

3

It is to re-state my suggestion that the Park might look to learn visitors to other Park resources. Furthermore, there may be merit in developing an interpretive overlook along the road from Webb to Moberly. This location of road provides an opportunity to work with the Hamilton in developing cultural exhibits about the history of settling people in the area. Perhaps the Park could work with the Museum of the Plains Indian in Branson to develop a seasonal exhibit and interpretive program. Glacier and Watkins provide an international example of good will between nations. Why not extend this concept to Park - To-Go exhibits? The Slide to Moberly. It will also provide an opportunity to learn more about mining activities which took place prior to the creation of the Park.

Once again, I thank you for this opportunity to comment and to congratulate you on a job well done.

Sincerely,

*James A. Council*  
James A. Council

3. Thank you for your good ideas and suggestions. They will be considered as we do further study on reconstructing the Going-to-the-Sun Road.

1137

**CONCERNED PIKUNI**

*Compliance To Our Goal*

P.O. Box 325, Browning, MT 59417 409/338-7308



TO Superintendent  
Glacier National Park  
West Glacier, MT 59936

November 30, 1999

RE: COMMENT ON ORIGINAL EMERGENCY PLAN FOR

THE BLACKFEET TRIBES' USE OF LAND AND WATER RIGHTS IN GLACIER PARK

The Blackfeet did not release their land or the water rights from the Cedar Strip, East Glacier Park, a right implicitly recognized by the U.S. in the Judith River Treaty of 1868 and aboriginal water rights, and explicitly not included in the agreement of 1895. The Blackfeet have a reservation of the waters flowing east by aboriginal rights, Treaty of 1868, and the agreement of 1895. Every one of the headwaters was used in a holy ceremony. One of the really important ones is the Grizzly Bear Lake watershed.

1 We do not agree that the United States has a reserved water right for entire instream flow on East Side Category 1 streams. The Blackfeet have never released our water rights from the "Cedar Strip". Therefore, these water rights are reserved to the Blackfeet.

The Pikuni have a priority date of the instream for water rights in East Glacier Park. The instream flow rights claimed by U.S. in East Glacier Park are junior to Blackfeet Tribal water rights and cannot be exercised at our expense. Likewise, our rights to enter, hunt, fish, cut wood have not been released nor compensated for. Our rights are prior and paramount and supersede any other claims to those rights.

As Mountain Chief said at the Fort Union Indian Congress of 1875, from interpreter "he says he wants the waters of his country preserved for his people...he says we have never used it but we are going to use it, but as we are coming to that time

Concerned Pikuni Committee—1137 [moved from tribes; was no. 5]

1. The question of water rights is beyond the scope of this document and is the subject of current negotiations between the Department of the Interior and the Blackfeet Tribe.

COMMENTS

RESPONSES

they want to take it away from us..." (Agnes C. Kent, Excerpts from the Blazed Trail of the Old Frontier).

Comments on Draft Environmental Impact Statement

--"the tribes still consider Glacier to be a spiritual place" (p.4). This should be part of the park's ethnology program to interpret the park (App. B -p. 285) and implement 1996 WASH. RES Policy (p.5-11).

2

--p. 289... all of the laws applicable to the Native American Tribes are not listed and need to be added. The American Indian Religious Freedom Act (AIRFA), the 1996 Native American Graves Protection and Repatriation Act, the 1996 Cultural Amendments to the National Historical Preservation Act (see National Register Bulletin 38), the Archaeological and Historical Preservation Act, the Civil Rights Act of 1964, the 1851 Judith River and Salpique Treaties, and the 1891 for protection and enhancement of the cultural environment - all applicable cultural law need to be listed in the EIS Compliance section.

3

--p. 13. Remove "more recently" is not right. Also incorrect - remove "(under Montana law)" is wrong. Our rights have never ended - U.S. government cannot terminate civil rights of its people without agreement for compensation or trade. Blackfoot rights were reserved under aboriginal rights and were implicit in 1851 Judith River Treaty and 1895 agreement.

Ethnology Incomplete

4

--the draft ethnology report, "Our Mountains Are Our Pillars: An Ethnographic Overview of Glacier National Park (p. 193), should be submitted to the Tribal Business Council and to the tribal corporate members for an extended comment period. The Blackfoot Nation and Blackfoot members seemed to have an comment period on this draft ethnology report. It has not been submitted to the Blackfoot tribal members. We want access to the first draft and any subsequent drafts, modifications, amendments, etc.  
--We have to identify all of our sacred sites and burial sites and verify the authenticity of findings, with application of appropriate Federal laws.

2. The list of legislation was not meant to be exhaustive; however, we have added the laws you have suggested to the "Compliance with Federal and State Laws" section in the final version of this document.
3. The phrase "more recently" has been removed from the "American Indian Relations" section of the final document. The subject of Blackfeet rights is under negotiation. These negotiations have not been addressed in this document.
4. The draft ethnology report was submitted to the Tribal Business Council in 1995 and again in 1996. To date, the park has received no comments from the Blackfeet Tribe. The National Park Service has a government-to-government relationship with the tribe. It is up to the Blackfeet Tribal Business Council to determine which tribal members should review this document.

COMMENTS

RESPONSES

5

- Why are Blackfeet harassed when they attempt to exercise rights (wood sock gathering, game and game management). This is wrong. Even testimony of the Blackfeet Nation (8/21/88) by Roger Running Crane verifies "We still obtain treaty rights in the park that include privileges to hunt, fish, and gather wood." Park Service needs a policy allowing our privileges consistent with USDOI new Education Policy.

6

-- p. 50. Re to shutting the road down. Yes to Alternative C - Plans should only do work that is necessary, to avoid disruption of the Mountain, and not to close down the Sun road that is bad for the small business outside the park. The 1997 Retaining Wall Inventory Update by Federal Highway Administration shows we need to shut down the Sun road. Finely repairs are needed and should proceed.

7

--p. 31. Re to re-opening and changing the central Sun Road corridor to visitor services development zone. Keep it natural for people to appreciate seeing the Mountains. Leave it the way it is. Don't change the zoning. If there is any development or zoning, the Blackfeet should have first rights to develop.

8

-- Blackfeet are discriminated against in hiring for jobs in Park. This needs to change. Jim Hill built three lodges in 1912 and hired Indians with stipulations that they would continue to be employed" (Testimony of Elder Joseph Bear Medicine, 11/26/88). Public Law 93-502, Section 7(b) of the Indian Education and Self Determination Act incorporated into the 1984 Civil Rights Act - on or near any reservation, the Indians get employment priority.

9

--p.18. The "wood strip" was leased, not sold. Our people didn't know what "leased" meant. Their understanding was that the land would be used for 99 years. All of our Elders have been telling us this. Further, if this is a lease as oral history show, then there is no boundary. If you examine the 1938 agreement, you will see that all the "Es" are identical and in the handwriting of one individual and therefore, would constitute fraud. Furthermore, it is

10

3

5. The activities mentioned are against the law according to the Code of Federal Regulations.
6. Please see the responses to the letter from the Coalition for Canyon Preservation.
7. The development mentioned is beyond the scope of this plan and is governed by other laws and contracts.
8. This subject is beyond the scope of this plan and is governed by other laws and contracts.
9. The matter you discussed is beyond the scope of this plan and is the subject of current negotiations between the Department of the Interior and the Blackfeet Tribe.
10. The availability of the *Draft General Management Plan and Environmental Impact Statement* was advertised in Alberta, and there were several public meetings in Alberta. No comments were received from the Canadian Bloods.

## COMMENTS

## RESPONSES

10

supposedly signed by W. Phipps and the Canadian Bloods, therefore, the Bloods need to make a comment on this management plan.

Any testimony developed by tribal attorneys for or on behalf of Blackfeet Tribal Business Council is subject to question (Bayer Meeting Notes, Sept. 21, 1998) if reference is made to the ceded strip being a land transfer - it was not. Corporate Tribal Members take issue with improprieties of our rights that demand, rather than uphold our rights, which are of the highest dignity.

11

p. 214, 241 - In our 1936 Federal corporate charter of the Blackfeet Nation, "each of its members (are given) a non-transferable certificate of membership evidencing the equal share of each member in the assets of the Tribe...". Therefore, it is not proper for the Park Service to simply consult with the Business Council only. Some issues need to be brought before the Tribal corporate members with an official action and consent, decided in our newspaper. The Tribal Council are elected to represent the people only to a certain point, then the matters need to be brought back to the Blackfeet corporate members.

-p. 136 says that "Traditionally trained Blackfeet were often employed (by Great Northern Railway) to greet tourists at depots and lodges". George Bull Child, the grandfather of Neve Bear Medicine, states her grandfather had to have written permission to leave his post of "greeting tourists".

#### Unresolved Boundary Issues

12

The boundary as surveyed pursuant to the 1895 agreement is not correct. We have documented proof of this. Further yet, the existence of a boundary is in question. The 1895 agreement was supposed to have been renewed within 50 years. The life of the agreement is not perpetual. If there is a boundary, it involves peak to peak of mountains on the continental divide.

There is no boundary line between the park and the Blackfeet Reservation as shown in the GMP NCP

11. In accordance with our government-to-government relationship with the Blackfeet Nation, the Draft General Management Plan and Environmental Impact Statement was sent to the Blackfeet Tribal Business Council for distribution to tribal members. Tribal members on the GMP mailing list also received copies of the plan.
12. The boundary was established in accordance with the agreement of 1895. We understand that some disagree with the ways in which this agreement is interpreted. It is not within the National Park Service's authority to modify these boundaries.

COMMENTS

RESPONSES

12

maps. The original boundary was incorrect according to wording of original documents.

13

Because of all the above, we are requesting additional six months comment time on technology report to become part of this record. We are concerned that the GNP KIM management document does not accurately reflect the extent of the Blackfoot (Blackfeet) rights retained by them.

The other thing we are concerned about the fact this plan may be used to specifically benefit a big multinational corporation for more development opportunity inside the park at the expense of local residents, businesses, and cooperative Tribal interests.

**CONCERNED FISHERY COMMITTEE**

*Handwritten: 18067 (C.D.#)*  
 JAMES W. SHERIDAN - (NORTHWEST FISHERY OF THE BLACKFEET TRIBES)  
*Handwritten: James W. Sheridan*

**BLACKFEET WOMEN'S HERITAGE SOCIETY**

- Handwritten: House 5110*
- Handwritten: Cathy, Blackfoot member*
- Handwritten: Bernard W. Yodanis Blackfoot Tribal member*
- Handwritten: Hugh Monroe " " "*
- Handwritten: Gordon F. Howard Tribal member*
- Handwritten: [unclear] " " "*
- Handwritten: Donald Leaky*
- Handwritten: Ken Talk. Shaw - BKF Tribal member*
- Handwritten: James [unclear] Blackfoot Tribal member*
- Handwritten: [unclear] " " "*
- Handwritten: Larry M. Brown - BKF Tribal member*

13. Please see response 4, above. The report is being finalized. The rights of the Blackfeet within Glacier National Park are discussed under "Guiding Principles for Glacier National Park" in volume 1 of this document





## COMMENTS

## RESPONSES



11/13/98

Draft/EIS GMP  
 Glacier National Park  
 W. Glacier, MT

To Concerned GMP planners:

On behalf of the East Glacier Chamber of Commerce, I would like to express our appreciation for your conduct regarding GTTSR project alternatives.

We understand that financing has been obtained to study the condition of GTTSR. We hope that, in addition to the results of the engineering study that the economic impact study will result in your choosing an alternative which will minimize the economic impact to our area.

We are all reminded that the reason we are here is because of Glacier Park, which we must preserve and protect, and provide the opportunity for others to do so. We hope the Park Service allows plenty of time for study, a consideration of the issue, so that a project alternative is chosen. We all do not want potential visitors to say "Well go somewhere else." because it is an appropriate planner to real closure.

East Glacier Chamber of Commerce—0882

Thank you for your comments. We look forward to your participation in this study.

COMMENTS

RESPONSES



**EAST GLACIER PARK  
CHAMBER OF COMMERCE**  
P.O. BOX 888  
EAST GLACIER PARK, MT 59434

*We thank you again for your previous consideration in  
this matter*

*Sincerely,  
Terry Sherburne  
E. Glacier Chamber of Commerce*

COMMENTS

RESPONSES

1146

The Ecology Center  
301 Sherwood St. Suite B  
Millsdale, NY 12547

November 23, 1998

Superintendent  
Glacier National Park  
West Glacier, NY 59908

Dear Superintendent,

I am writing regarding the Draft EIS for the Management Plan for Glacier National Park. There are a number of concerns that I have regarding this proposal that I hope you take into consideration when making your decision. Overall, I strongly feel that you would retain the existing Park Policy that supports 100% Organizational Budget Wilderness as its condition to be managed as Wilderness. As superintendent you are responsible to develop and maintain a "Wilderness Management Plan", and not put it as you have proposed in this EIS. I lived in Glacier for a year while I worked for the Glacier Institute, and saw well above of the human presence that are already impacting Glacier. This park does not need any more.

I feel that it is imperative that you retain existing Historic, Natural, and Cultural Resources from being altered within a natural area, and not be changed to a visitor service. If this were to happen, increased development would take place, and the Park Service would be more inclined to allow significant non-wilderness projects to take place. I request that you support the national plan for Going to the Sun Road, since this road is on the National Historic Register. Lake McDonald and Spirit Mary Lake should also be left as natural areas in certain areas. As you are well aware, these lakes are fragile ecosystems, that do not need increased human presence. I am against increased motor boat use on these lakes as well, and no use of jet skis.

I am also against any new development inside the park, such as new wheelchair ramps, rest room restrooms, and new parking lots. I ask you to maintain the existing management philosophy to place development outside of the park, not inside. Please allow the local businesses to continue to flourish, and not push them out of business by subsidizing the multi-national corporations that own C&M. In addition, if you agree to allow a wheelchair ramp inside the park, you are jeopardizing critical yellow rump ground Lake McDonald.

Please give my comments consideration when making your decision, and make the ramifications of your decisions. Glacier National Park is one of our nations most valuable treasures, that should remain as wild as possible.

Sincerely,

*Debra Knott*  
Debra Knott  
Executive Director  
The Ecology Center



The Ecology Center—1146

Thank you for your comments.

COMMENTS

RESPONSES



Dear Katia,

Thank you for sending me the Management Plan.  
Let me check with what I think. sorry missp page 57 & 59

Page 57- Alternative A

Permitted Beneath P.W.C.

Page 54- Alternative A

No Commercial sightseeing over Glacier National Park

Page 60- Alternative A

Allow Wildlife to follow National & Provincial  
others listed

Page 58- Alternative A

Case on mutation of snowshoes - if they are  
allowed it would like to consider them also  
being allowed

Page 62- Alternative B

1. If the center can be located directly outside &  
then not using park land. It is not understood  
why describe nature on park land.

The Equinox—0029

1. Please see the "West Side Discovery Center and Museum" issue and preferred alternative.

COMMENTS

RESPONSES



Page 45 Alternative A with reservations

a. I am not in favor of restricting cycling. Its environ-  
impact is very small. I would decrease speed limits

2

b. In making places for Danmore primary cars to  
pull off + park, how much pavement would  
be paved over?

If using Alternative B.

Parking underground would be preferable if  
building such a facility was not detrimental  
& trucks ect. carrying supplies needed

Page 48 Alternative A

Page 50 Alternative A

Thank You for letting me voice  
my opinion.

Elizabeth Clark



- 2. The actual acreage involved in the construction of additional parking areas and pullouts along the Going-to-the-Sun Road would be small and would depend on the final design agreed to as the result of the new comprehensive use plan for the Going-to-the-Sun Road. Also please see the new preferred alternative (A1) for the preservation of the Going-to-the-Sun Road.

COMMENTS

RESPONSES

0774

to whom it concerns, November 9, 1998

I write on behalf of Flathead Audubon.

Please preserve and protect natural and cultural resources in accordance with the G.N.F. mission statement.

Please oppose to the F.A.A. that aircraft overflights be prohibited in G.N.F., both helicopter and fixed wing.

Helicopter use should be limited to search and rescue. They should never be used for construction, maintenance or trail work purposes. Use of helicopters for non-essential purposes does not comply with the wilderness mandate.

Please make the temporary base on job-site and immediately permanent.

Building additional pull-outs along going-to-the-sun road will not reduce congestion at Logan Pass. It would only increase the number of congested parking areas. Instead, please develop a voluntary mass transit system that would run frequently, cover the Park's existing road system and be affordable for all visitors. It may need to be subsidized.

8% of G.N.F. is proposed Wilderness and must be managed as such. Please let your highest priority be keeping Glacier Wild.

Thank you for the public hearings and the opportunities to speak and comment.

Tatila Brown  
Director-Flathead Audubon

*Tatila Brown*

540 Wolf Creek Dr.  
Bigfork, MT. 59717

Flathead Audubon—0774

Thank you for your comments.

COMMENTS

RESPONSES

0749



Derek Mills  
Supervisor  
Glacier National Park  
West Glacier, MT 59912

Supervisor Mills:



The Flathead Resource Organization is a community and non-political group concerned with the land and people of the lower Flathead River Valley. In the past decade, FRO's main emphasis has been on controlling transportation growth on the Flathead Indian reservation and elsewhere in western Montana. Based on a significant body of information, we believe that fast roads result in premature development of rural and wild areas, and create overcrowding and traffic jams.

In reading through the Glacier Park Staff General Management Plan, we find several changes in Park policy which are designed to accommodate existing and anticipated future human use of Glacier National Park. Specifically, we refer to the change in zoning from "natural" to "visitor service" in several areas and the removal of protection for wilderness candidate areas.

We believe that these changes in management which could alter the landscape of the Park which could be avoided if the plan were to emphasize transportation control rather than expansion of visitor resources to accommodate traffic growth. We urge you to consider an earlier reception alternative which would emphasize public transportation within the Park and a reduction of private vehicles, and therefore a reduction in accommodation for them.

We recommend that you adjust the park fee schedule to reward visitors who use Park concession transportation in heavily-used areas such as Going To The Sun Road. The per-person fee for those using private vehicles could be twice as much as those using public transportation.

By adjusting the management pattern now, the Park could avoid the further erosion of its resources by ever-increasing private vehicle traffic. Zoning could remain

1

Flathead Resource Organization—0749

1. Please see the responses to the comments of Friends of the West, the Montana Wilderness Association, and the Wilderness Society. The assessment of an expanded transportation system is a part of the preferred alternative for visitor use on the Going-to-the-Sun Road. Ultimately only Congress can change fees; however, this alternative calls for the development of a comprehensive use plan for the Going-to-the-Sun Road. This planning process would assess a variety of methods to maintain the quality of the visitor experience for visitors who use the road.

COMMENTS

RESPONSES

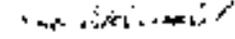
In a more protective disposition in sensitive areas despite increased visitor use, if not, visitors used public transportation.

We are also concerned that increased commercial development within the Park, either by the Glacier Park Company or other concessionaires, could have a drastic effect on the integrity of the park. Visitors should be encouraged to enjoy and learn from the Park's natural resources, not from the "Disneyfication" of concessions. Better to encourage local businesses in surrounding communities than to compete with them inside the Park.

We also strongly urge that the Park reject management policies that would expand winter usage. The Park's fragile wildlife and plant communities need a season or two to recover from the heavy use of the summer tourist season. Yellowstone Park winter season has been a headache for Park managers and a danger for wildlife. Please retain the current policy of minimal road maintenance and winter closure of concessions.

Our more joint FERC would like to emphasize: Glacier Park, the Flathead Indian Reservation, the Blackfoot River, and the Blackfoot Mountains are all on the same transportation grid, and therefore share a common problem that can only be resolved by new thinking in regard to transportation management.

Sincerely,



Joseph P. McDonald  
President

COMMENTS

RESPONSES

0798

**FLATHEAD WILDLIFE, Inc.**  
**P.O. BOX 4**  
**KALISPELL, MONTANA 59908**

November 12, 1998

Mr. David A. Minella  
Superintendent, Glacier National Park  
GEMSEED Project  
West Glacier, MT 59936

Dear Mr. Minella,

Flathead Wildlife, Inc., and its 188 members would like to take this opportunity to comment on your proposed management plan for the GNP. We support your general philosophy for managing Glacier, and the delineation of the six geographic management areas.

Comments regarding the management proposals are:

- Continue to allow motor boat use and fishing in lakes and streams that presently allow it, in all the management units.
- We support Alternative A: No Commercial Sightseeing Trips over Glacier National Park.
- We support Alternative A: No Commercial Sightseeing on All Park Waters.

1 There is one area of concern which is not addressed in the RMP in our submission. That is the concern for the management of wildlife and WABE species in the North Fork area. Basically it is managing a scattering population of game animals to provide hunting for sportsmen and sportswomen in addition to maintaining a predator population. It is a concern that that along the occurrence of a wolf pack and an increase in wolf numbers and one individual pack in GNP, the deer and elk populations in the North Fork has been drastically reduced to the point where many hunters no longer visit the area for their favorite sport.

2 GNP, working with the surrounding government land managers, the U.S. Fish and Wildlife Service and the Montana Department of Fish, Wildlife & Parks, must devise a plan to re-establish these big game animals to the numbers they once were. To ignore this problem now may eventually lead to a dangerous management situation which is presently occurring in Yellowstone National Park. Now is the time to begin working on this problem.

Sincerely,

Wayne Worthington  
Secretary-Treasurer



The Wildlife of Our Nation is in the National System.  
Preserved by Congress, Not Commerce.



Flathead Wildlife, Inc.—0798

1. Descriptions of such site-specific management issues are too detailed for inclusion in this plan. Managing predator and prey populations in the North Fork Plan is covered in the park's Resource Management Plan and other such park plans.
2. Glacier strives to let natural ecosystem processes prevail in the park, including the rise and fall of predator and prey species. Glacier National Park will continue to be a "safe haven" for all animals and will remain a reservoir for breeding populations. The park works closely with both the Montana Department of Fish, Wildlife and Parks and the U.S. Fish and Wildlife Service on issues of mutual concern.



1157

**Friends of the Bitterroot**

P.O. Box 442  
Hamilton, Montana 59840

November 27, 1998

Glasier National Park  
BUDYENK Project  
West Glacier, Montana 59936

**Greetings**

This letter is in response to the Glasier National Park Draft Management Plan and the RMP. First, a word about our group. We are a Montana grassroots conservation organization who has typically been in existence for a decade. Most of our approximately 500 members live in the Bitter Root valley. For years, many of our members have hiked, backpacked and generally enjoyed all of the things that Glacier Park has to offer. Obviously we love the Park and, very well indeed,

The following are the ideas which we believe should be included in the management plan:

- \* The use of Glacier Park administered by the National Park Service for wilderness classification should be finalized by law. We must be kept in mind.
- \* The visitor's center proposed for the west side of Glacier should be located outside of the Park. We oppose more parking and building inside the park.
- \* Although citizens should expect to have access to the Park, that doesn't mean that they should have a "right" to exactly Glacier in Hamilton and find way around, especially those pollution throughout Glacier and surrounding the wilderness experience of Bitter and compare in fact, we should in fact be the "right" of nature. Each over flights like absolutely legal wildlife.
- \* Wilderness protected areas on all waters within the Park. Doves areas like the area that their share of the wildlife.
- \* Permanently ban all personal water craft and snowmobiles.
- \* We say up to the proposed expansion of accommodations, year round accommodations or mid winter stays. GLASIER's opinion don't need the additional winter classes. Each of their winter stays has already been impacted.

1

Friends of the Bitterroot (11/29/98)—1159

1. Please see the section, "Alternatives, Ideas, and Strategies Considered But Rejected."

COMMENTS

RESPONSES

2

\* develop a "no cost to rider", frequent service, public transit system on going to the Sun Road. In conjunction with that proposal, install a station to help spot trail for all potential visitors. One trail leads for road maintenance. The no cost rider's idea is to be.

Thank you for the opportunity to comment.

*John D. Young*  
 John D. Young, President

- Road tolls and user fees could be considered in a comprehensive use plan for the Going-to-the-Sun-Road. The evaluation of an expanded public transportation system is also discussed as a part of the preferred alternative for visitor use on the Going-to-the-Sun Road.

COMMENTS

RESPONSES

1153



November 23, 1996



Dwight A. Minick, Superintendent  
Gardiner Park  
W. Glacier, MT 59916

Dear Superintendent Minick:

I am writing to comment on the Draft General Management Plan (GMP) on behalf of Friends of the West, WW Office, the regional office of a national environmental advocacy organization.

1

We strongly urge you to implement existing Park policy which requires that all Congressional Study Wilderness areas be managed as Wilderness. In accordance with Glacier's existing Management Planning we request that you revise existing EIS/EA, Revised and Final Designated Development EIS/EA. We oppose changing the current Going-to-the-Sun Road corridor from "natural" to "visitor services" zoning.

2

The GMP offers no evidence of a "case" for shutting down and rebuilding the Going-to-the-Sun Road. Instead of proposing new construction on this road, we urge you to consider alternatives such as limiting road use to visitor shuttle buses, as they do in Grand Teton Park.

We support the existing management philosophy of allowing only outside the park. We respectfully request that no new development take place inside the Park such as the plans (submitted as an addendum to the EIS/EA) for a new wilderness trail, trail food containers, and parking lot. If the West Side Discovery center is to be built, it should be located outside the park in accordance with the existing management philosophy. We oppose the use of taxpayer dollars for development inside the park.

3

We further support a complete ban on personal vehicles and regulation of helicopter flights. Furthermore, we also request that no new development be permitted. Lakes such as McDonald and St. Mary should be managed to preserve their natural state and not be used in their entirety for "visitor services."

We are pleased with your efforts to make informed decisions about the management of Glacier Park and we thank you for the opportunity to submit these comments. If you have any questions, feel free to call. Please keep this office informed of any developments in this matter.

Sincerely,

Chris Kucharski

4512 University Way, NE • Seattle, WA 98105 • Phone (206) 625-7861 • Fax (206) 625-1829 • E-mail: [seattle@friends.org](mailto:seattle@friends.org) © 1996  
National Office

Friends of the Earth—1153

1. Please see the responses to the comments of the Montana Wilderness Association, the Friends of the West, and the Wilderness Society. Also please see the summary of public comments and the NPS responses on winter use.
2. Please see the responses to the comments of the Coalition for Canyon Preservation.
3. Please see the responses to the comments of Cold Mountain, Cold Rivers.

## COMMENTS

## RESPONSES



HC 07, BOX 060 • CLAYTON, ID 83227 • 208/698-2431 • FAX 208/698-2825

October 12, 1998

Superintendent Jeffrey  
Glacier National Park  
West Glacier, MT 59254

Subject: Comments on New Management Plan Draft EIS for Glacier National Park

Dear Superintendent Jeffrey:

Glacier National Park is a spectacular park that has been historically managed for development outside the park. We encourage you to maintain that historic management philosophy. Please take the following comments into consideration:

1. Implement the existing park policy that requires 50% Congressional Study Wilderness to be managed as Wilderness.

2. Discontinue and revise existing park management zoning. Remove existing blocks, natural and scenic development development areas as shown in Glacier's existing management zoning.

3. Oppose changing the eastern Going to the Sun Road corridor from "natural" to "visitor services" (i.e., scenic development). Lake McDonald and Elmer Lake should not be actively managed "visitor services," but should be managed for natural values.

4. Oppose suggested center building of the lake.

5. Support park bus on lot plans.

6. Support regulation of helicopter over flights.

7. Oppose the Rapid Development Concept Plan for the Lake McDonald Plateau District. The draft EIS clearly includes the development plan for a new wintered motel, but food restaurant, seasonal tent parking lot as an alternative in the bibliography.



## Friends of the West—0370

1. Please see the general responses about wilderness and the responses to the comments of the Montana Wilderness Association and the Wilderness Society.
2. The zoning system used in the 1977 *Master Plan* was derived from the 1962 Outdoor Recreation Resources Review Commission, prescribed for application by the Bureau of Outdoor Recreation, and further explained in the 1970 Administrative Policies for the National Parks and National Monuments of Scientific Significance. This early zoning system was superseded in the National Park Service by the 1982 *Management Directive 2*, "Park Planning". As the general management planning process was beginning, that management directive was being replaced by *Director's Order 2*, "Park Planning," which was formally adopted on May 27, 1998. The director's order says, on page 21, "To allow for a meaningful level of specificity, management prescriptions are applied either by geographic area in the park [management zoning] or by specific resource type parkwide [such as prescriptions related to air quality, regardless where it occurs in the park]."

On page 24 of the director's order, the direction for management zoning or management areas is described: "The particular management zones identified for a park will generally fall into four broad categories identifying the overall management emphasis: natural resource preservation [our backcountry and day use zones], cultural resource preservation [included in our rustic and visitor services zones], development [included in our visitor services zone], or special use [none in the General Management Plan for Glacier]. However the management prescriptions and the zone names describing those prescriptions do not have to be standardized and can reflect the particular circumstances of each park."

The specific zones used in the 1977 *Master Plan* were absorbed into the new zones of the new *Draft General Management Plan*, and boundaries were modified to reflect the current management direction. The class II area (general outdoor recreation), which should include, according to page 32 of the Administrative Policies, "administrative facilities, formal campgrounds, two-way roads, [emphasis added] etc. of varying intensities" is absorbed into the visitor use and rustic zones. The reason that the *Master Plan* did not place the eastern part of the Going-to-the Sun Road corridor in class II, the correct

COMMENTS

RESPONSES

We would like to encourage you to oppose new development inside the park, and to maintain the existing management philosophy in allowing only rustic in the park. The big multi-national corporations that own the GNP park commission want strictly industrial development inside the park. This means business away from the local economy outside the park.

Thank you for the opportunity to comment on this very important issue.

Sincerely,

Kathy Richmond, Vice President  
Friends of the West  
PO Box 880  
Casper, WY 82401-0880  
Phone 307/234-2411  
Fax 307/234-2283  
e-mail: krichmond@fthewest.org

zone at that time, is not known. That plan does not describe what is there or what is desired. Because of the scale of the map in the *Draft General Management Plan*, the visitor services zone often appears larger than it would actually be. In much of the road corridor, the backcountry zone boundary, which often coincides with the wilderness proposal boundary, would be only 500 feet from the centerline of the road.

The old natural zone (class III) in the *Master Plan*, which contained lands that “are important to the proper preservation, interpretation and management” of class IV (outstanding natural area) and class V (primitive or wilderness), was seen as a “transition, setting or buffer between intensely developed areas of the park (classes I and II) and (a) the primitive or wilderness (class IV) or (b) the unique natural features” Class V was essentially absorbed into the backcountry or day use zones, mostly in the proposed wilderness. The Going-to-the-Sun Road did not belong in this zone.

The class IV (unique natural features or outstanding natural area zone), as it was renamed in the *Master Plan*, would be totally included in the proposed wilderness, which would be a subzone within this plan’s backcountry zone. The entire class V wilderness or primitive zone is within the proposed wilderness. Additional subzoning to make more specific prescriptions in the new zones would be forthcoming soon after the General Management Plan is approved.

Subzoning might further divide the visitor use zone into historic districts. Some of these are also in the rustic zone (for example, Cut Bank Ranger Station) and the backcountry zone (for example, Belly River Ranger Station). Subzoning would also separate road corridors and establish the limits of permitted facility development. Much of the natural character would still be retained in the subzones, and resource standards would be established. It was never intended that development be permitted equally throughout the visitor services zone.

The proposed wilderness, which was placed in the class IV (outstanding natural area) and class V (primitive area) zones by the *Master Plan*, would be in the backcountry and day use zones under this plan.



COMMENTS

RESPONSES

42

1 the Wild West. We are a grass-roots conservation  
 2 organization located in the Swan Valley.  
 3 We are encouraged by some aspects of the Draft  
 4 General Management Plan K18 and we are disturbed by others.  
 5 It appears as if Glacier Park has already decided what the  
 6 General Management Plan will be and that the Environmental  
 7 Impact Statement is comprised of alternatives to fit this  
 8 General Management Plan. We find this to be very disturbing  
 9 and inconsistent with the spirit of the National  
 10 Environmental Policy Act.

1

11 the General management plan and K18 alternatives  
 12 carve the park up into zones such as visitor services,  
 13 rustic and backcountry, and ignores the fact that nearly 80  
 14 percent of the park has been identified as suitable for  
 15 preservation as wilderness and must remain so until an act  
 16 of Congress. Not one of the proposed alternatives even  
 17 mentions the word "wilderness" in connection with how the  
 18 park will be managed.

2

19 Currently, approximately 99.1 percent of Glacier  
 20 National Park is road natural and wilderness. If this  
 21 zoning is replaced by backcountry, rustic and visitor  
 22 service, it will leave the park open to future development.

23 We believe that the park is being mismanaged by promising  
 24 to the public that this new management plan will keep it  
 25 like it is. In fact, it appears that there will be no

GOVERNMENT REPORTING (406) 852-4924  
 P.O. Box 1182 Whitefish, MT 59907

1. Please see the responses to the letters from the Montana Wilderness Association and the Wilderness Society, as well as the general response about wilderness.
2. Please see responses to the comments from Friends of the West and the Coalition for Canyon Preservation.

COMMENTS

RESPONSES

43

1 ~~oppose~~ ~~for~~ increased development along the Going-To-The-Sun

2 ~~Road, on the lakes, at the lodges and throughout the park.~~

3 2 Please include an alternative that does, in fact,

4 3 retain the natural and wilderness designations that already

5 4 exist in Glacier Park. Glacier Park contains a wide variety

6 5 of habitats and is a refuge and provides essential habitat

7 6 for many species that are threatened, endangered, sensitive,

8 7 and rare. We do not see that this important aspect is

9 8 considered in a Draft Management Plan. The park is more

10 9 than a playground for humans; it is a home to many animals.

11 10 We believe that the park should encourage the use

12 11 of a public transportation system to alleviate congestion on

13 12 the Going-To-The-Sun Road and at the Swaincha and Logan

14 13 Pass areas.

15 14 We support the expanded ban on personal

16 15 watercraft within the park; we support a ban on commercial

17 16 night-seeing overflights in the park and we support a ban

18 17 on snowmobiles in the park.

19 18 We do oppose the winterization of the lodges to

20 19 expand visitor services in the winter. There are already

21 20 stores, ski areas and ski rentals available to the public

22 21 outside of Glacier Park. The solitude and wildlife values

23 22 in the winter should remain as they are. There is no need

24 23 for the taxpayers to subsidize commercialization in the park

25 24 which competes with commercial enterprises outside the park.

GOOGLE NEWSGROUP (444) 882-8188  
 P.O. Box 1182 Whitefish, MT 59907

3. Glacier National Park will continue to manage the proposed wilderness (approximately 95% of the park) as wilderness as if it had been formally designated wilderness at least until Congress acts on the wilderness proposal. None of the eight critical issues evaluated in this document is entitled "wilderness management," but most of these issues involve the preservation of wilderness values to a greater or lesser degree (for example, scenic air tours, personal watercraft, west side discovery center). The fact that wilderness management was not included among the eight critical issues in no way signals any lessening of the importance of wilderness to either park management or the public.
4. The resource concerns you mentioned were all considered during the preparation of this plan. Please see especially the "Guiding Principles" near the front of the document and the "Environmental Consequences" chapter.

COMMENTS

RESPONSES

09/17 44

1 He also believes that any interpretive centers or  
2 museums should be located outside the park to alleviate  
3 congestion and reduce development and protect habitat.  
4 Thank you for the opportunity to comment tonight.



COMMENTS

RESPONSES

1 together at Blackship Bridge for about five or six  
 2 years in the late 1970s through 1981 or '82. I can't  
 3 remember now which year. But, so, I'm real familiar  
 4 with the Park and did quite a lot of, you know,  
 5 day-trips and camps and winter skiing expeditions and  
 6 you name it. We used the backcountry extensively during  
 7 the time I lived there and did quite a bit of fishing.  
 8 Not just in the rivers, but in the lakes as well and in  
 9 a lot of the streams.

10 I'm a little concerned about the -- some of  
 11 the language used in the presentation of the Management  
 12 Plan and the Plan Overview. It seems to me if -- and I  
 13 thank the woman here for clarifying the current  
 14 management emphasis which is wilderness, which is  
 15 mandated by the 1974 study, which is time I spent near  
 16 there and there, was quite a discussion at that time of  
 17 course about that study. But I do think that it is very  
 18 important that the language in the final document be  
 19 clear about "wilderness" and use the word as frequently  
 20 and as clearly as possible. It seems to me that the  
 21 public has different interpretations of different words.  
 22 And the word "wilderness" speaks very clearly to what  
 23 the Park is and how the people, at least the people that  
 24 I know, perceive it. It is the best description that I  
 25 can think of for Glacier National Park -- and of course

Public Hearing - 29

CHARLES E. FISHER COURT REPORTING, INC.  
 200 WEST WASHINGTON  
 MISSOULA, MONTANA 59701

1. Please see the revised description of backcountry near the front of the document under "General Philosophy: Backcountry Zone." Also please see the responses to the comments of the Montana Wilderness Association and the Wilderness Society.

1

## COMMENTS

## RESPONSES

1     Waikanae as well. I think the other thing to stress is  
 2     that it is an issue forward and is today an international  
 3     park. And recent information, and the announcement that  
 4     the superintendent of an international and/or national park  
 5     is now going to be reassigned to work for the government  
 6     of New Zealand concerns me deeply. And I think that it is a  
 7     totally inappropriate move. Not just the fact that I  
 8     can remember when the superintendent wanted to live in  
 9     Whangarei and couldn't quite stand the political heat  
 10     from wanting to be the first Superintendent not to live  
 11     in the Park. I can't imagine how somebody can do an  
 12     adequate job of managing that much land and territory  
 13     and with the diversive issues from Nelson. And as I  
 14     just wanted to throw that in that I think that is not  
 15     only a waste of taxpayers' dollars but totally an  
 16     inappropriate and jurisdictional problem that I think  
 17     should be avoided at all costs. You know, if  
 18     Superintendent Halesch wants to take time off, he  
 19     resigns, or retires early, great. But I don't think  
 20     there's a place for a Federal Park Superintendent in the  
 21     Governor's Council's administration. And I hope that  
 22     the Park will correct that as soon as possible and  
 23     hopefully, if necessary, to go to higher levels to keep  
 24     that from happening.

25             Back to the Plan, again, as was stated earlier

Public Hearing - 88



## COMMENTS

## RESPONSES

1 that the wolves were not contemplated, those wolves  
2 walked back into the United States and occupied parts of  
3 Glacier National Park.

4 And of course that's one of the big  
5 differences, I think, between Yellowstone and Glacier is  
6 that, you know, Glacier was never designed to the point  
7 that you had to take the kind of intervention that we -  
8 - we've seen in Yellowstone; and for obvious reasons:  
9 There is one road. Compare that to the number of roads  
10 here in Yellowstone. I'd like to keep it that way and  
11 I'm not at all upset that we may not have any roads if  
12 the Going-to-the-Sun Highway is for some reason  
13 abandoned or shut down for construction.

14 You know, it was always a fantasy of many of  
15 the local residents to talk wildly late at night in the  
16 bars about what would happen if the Triple Archers gave  
17 way, and of course beyond that -- I won't go any  
18 further. I may get self-incriminating of some sort.

19 But when you look at the engineering that is  
20 required to keep that road up there, it doesn't take a  
21 rocket scientist to see that eventually it is going to  
22 take a Herculean effort to keep it up there. And again,  
23 if the "wilderness" is the objective, and I truly  
24 believe that is the future -- for future generations,  
25 this is the optimum and the best we can do for Glacier.

Public Hearing - 22

COMMENTS

RESPONSES

1 let the road just -- let gravity do its thing. Don't  
 2 spend the money. Just wait it out and eventually we're  
 3 going to have an even wilder park rather than -- as the  
 4 woman here pointed out -- that whatever percent of the  
 5 park you can see from the road -- well, the flip side of  
 6 that is the percentage of people who never get out of  
 7 their car. So if we are doing wilderness tours, great,  
 8 as long as it lasts. But I don't think we should spend  
 9 more tax dollars on perpetuating that. I mean, to me  
 10 that's not the wilderness experience is somehow going  
 11 into your Jurassic Park kind of a scene or where, you  
 12 know -- the wilderness scene of the Steven Spielberg  
 13 movie is the experience that we're trying to produce for  
 14 people. Because they like it. Well, of course they like  
 15 it. We're bombarded with this kind of experience  
 16 perpetually and so, you know, rather than try to cater  
 17 to people who don't know what wilderness is, it seems to  
 18 me that the park has -- in the past has done an  
 19 excellent job through its scientific tours, and the  
 20 naturalist tours, and the scientific research for which  
 21 it had most of the park system for a long time. These  
 22 are the features that I think we should try to stress,  
 23 so without getting too lengthy here. and I  
 24 know you guys are -- have doing this a long time, and  
 25 many meetings. I'll close. But I just wanted to make

Public Hearing - 11

CHARLES D. BERRY, CHIEF, BUREAU OF LAND MANAGEMENT,  
 U.S. DEPARTMENT OF THE INTERIOR  
 WASHINGTON, D.C.

## COMMENTS

## RESPONSES

1 were that the wilderness -- you know, number one  
2 through nine and then number ten is let's take of the  
3 reserves, and let's take care of the people that want to  
4 drive through the Park. And the gentleman here I think  
5 had a good point on the helicopters. We also discussed  
6 about what might happen to helicopters, but I'll leave  
7 it at that. And thanks for the opportunity to comment.  
8 And we'll try to submit written comments before the  
9 extended deadline. Thanks.

FORM NO. 20 THE SLIP WHICH PRELAYS

ANTWERP DATE

P. 93

1149

**GLACIER ACTION AND INVOLVEMENT NOW, INC.**  
4 North Central Avenue - Oak Brook, Illinois 60422 - 630-573-2377

November 29, 1978

**CHRYSLER Project:**  
Glacier National Park  
Park District, Madison 53701

**MEMORANDUM FOR CHRYSLER:**

The National Institute of Environmental Studies of the American Automobile Association, Inc. (NIAA) - Madison's only state-recognized environmental advocacy organization in Glacier County, is respectfully submitting this memorandum in addition to the ongoing Glacier National Park District Management Plan.

The NIAA, representing the public interest, is hereby requesting that the opportunity to comment on the proposed Management Plan be made available to the public in a timely manner. The NIAA is requesting that the public be given the opportunity to comment on the proposed Management Plan.

Consequently, NIAA is requesting that the proposed Management Plan be made available to the public in a timely manner. The NIAA is requesting that the public be given the opportunity to comment on the proposed Management Plan.

Specifically, we would like to see the proposed Management Plan be made available to the public in a timely manner. The NIAA is requesting that the public be given the opportunity to comment on the proposed Management Plan.

**CONCERN FOR THE CHRYSLER PROJECT**

It is our hope that the NIAA will continue to work with the public in a timely manner. The NIAA is requesting that the public be given the opportunity to comment on the proposed Management Plan.

**CONCERN FOR THE CHRYSLER PROJECT**

We hope that the NIAA will continue to work with the public in a timely manner. The NIAA is requesting that the public be given the opportunity to comment on the proposed Management Plan.

Glacier Action and Involvement Now, Inc.—1149





COMMENTS

RESPONSES



Glacier Country Regional Tourism Commission  
 107 Ave. 2000  
 Bigfork, MT 59911-4625  
 406-837-4311  
 Fax: 406-837-4291  
 406-834-4257  
<http://www.mt.gov/glacier>

0175



November 23, 2028

Supervisor David A. McCall  
 GMP/DES Project  
 Glacier National Park  
 West Glacier, MT 59936

Dear Supervisor McCall,

The Glacier Country Regional Tourism Commission appreciates the time and effort Glacier National Park has put into the Management Plan for the Access of Glacier National Park, as well as the degree of transparency, communication, and trust. Our comments and suggestions are listed below:

1

1. **Vehicle Turn on Going-to-the-Sun Road (pages 43-44)**  
 Alternative D - Consider alternative A/B to include more turnouts recognizing that while alternatives there will be congestion on Logan Pass. For safety reasons, more turnouts are needed in preparation for the increase in visitation. The Park should experiment as a result of the repair work to the road. Identify and construct additional turnouts as this will help with maintenance plans if necessary as well as the general access on either side of Logan Pass and near back. Expansion of the parking area at Logan Pass is needed due to the problem of the increasing fall and winter driving to drive around until a spot opens up.

2

2. **Preservation of the Going-to-the Sun Road (pages 49-50)**  
 The Glacier Country Regional Tourism Commission Board of Directors supports a comprehensive Glacier National Park plan to evaluate aspects of the Going-to-the-Sun Highway. We appreciate the National Park Service's role in the selection of any road reconstruction alternative, with a site specific bill on the Going-to-the-Sun Highway is completed to include local and regional, social and economic impact and mitigate global warming effects. Our recommendation is to assess all available construction methods and techniques to collect or eliminate road closures, using the most efficient, cost effective, plus using real public safety technology available, while maintaining the historic appearance of the canyon walls.

3

Glacier Country Regional Tourism Commission also suggests that the appropriation report include funds for a fully developed public education program, to help offset anticipated visitor impact. This fund program should include support from Glacier National Park, local business, Glacier Country Regional Tourism Commission, the Associated Chambers, Merchant Guild and all other organizations affected by the construction.

We recommend that progress be identified and funds allocated as possible. Thank to those business most severely affected by the negative impacts of reconstruction.

Glacier Country Regional Tourism Commission—0973

1. A comprehensive use plan for the Going-to-the-Sun Road (now the new preferred alternative) will address the issue of adding more turnouts.
2. Please see the rewritten preferred alternative under “Preservation of the Going-to-the-Sun Road.”
3. Please see response 2, above.

COMMENTS

RESPONSES

Page 3

Nov. 25, 1996

4

3. **Permitting of Historic Events and Winter Services (pages 38 - 40)**  
**Alternative C -** Maintain public and private ownership where it currently exists. Provide accommodations with long-term leases up to 10 years to enhance park ability to maintain and rehabilitate the property.

4. **Historic Trails (pages 41 - 43)**  
**Alternative D -** Allow night-use trails to utilize parts of the park and develop a series of four overnight trails. We concluded that these treatments are substantially different from the FEA and that USFS has agreed to accept recommendations from the Park on this subject.

5. **Personal Winter Use (pages 64 - 65)**  
**Alternative A -** Ban personal winter use on all park roads.

5

6. **Winter Use (pages 66 - 67)**  
**Alternative D -** Consider Alternative A (prepare for more winter day use) and B (expand winter opportunities to include overnight activities) and recommend investigating expansion of winter opportunities to include overnight accommodations on site and west side of the park; prepare for expanded winter day use, as well as the shoulder season of spring and fall.

6

7. **Shuttle Bus and Road (pages 68 - 69)**  
**Alternative D -** Agree with Alternative C but suggest looking at road closures that does not conflict with Glacier National Park's policy of Road Closures.

8. **West Side Highway Center and Access (pages 70 - 71)**  
**Alternative A -** Construct the facility inside the park but also recommend reducing the size of the center.

Thank you for your consideration of our recommendations of what we also find to be one of the most beautiful places in the world and part of our heritage. Please do not hesitate to call our office at 406-857-6211 if you have any questions. We look forward to a decision that will take us well into the new millennium.

Sincerely,



Linda J. Anderson  
 Executive Director

LJA/aw

4. Current federal law limits contract terms to 10 years, with a 20-year limit for contracts having special capital investment requirements.
5. Please see the rationale for the selection of the preferred alternative under "Winter Use" in volume 1 of this document.

We will continue to accommodate visitor use during the spring and autumn.

6. There is no form of flood control that does not conflict with NPS policy.





David L. Gilbertson, PhD, LMA, CPA  
Assistant Professor  
Department of Accounting

Bellevue 441, 400001  
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425-352-4241  
Fax 425-352-4241

0574



### Glacier National Park Draft General Management Plan-EIS

#### Comment Form

Comments provided by: Don Gilbertson, Ph.D. - Glacier Park Foundation:

1 Page 67 of Draft GMP: Private Donations - Grants - "Additionally, ownership by the government or by a for-profit company would be the best alternative for many of these donations or grants." comment: This is not, however, the best choice. It could be assumed by either the Gov. to own such structures & the for-profit to issue. Underneath, it would be assumed with conversion fees, according to IRS rules, as for Federal as one-way trust - It is done with the use of private entities. It is so here that Federal trust grant Congress to appropriate to private sector ownership.

2 IP. 67 of Draft GMP - Do not report alternatives to out-of-hand - Why hasn't park prepared with 230 acres study regarding the economic feasibility of opening the Glacier House Camp and the Village Inn year-round? Also, how report the economic feasibility of opening the Village Inn at Agassiz

This full document is available online at <http://www.nps.gov/glacier/management.htm> if you think you have an opportunity to report a comment on the Draft General Management Plan and Environmental Impact Statement, please send it to GMP-EIS Project, Glacier National Park, West Glacier, MT 59936. Comments may also be sent via email to [glac\\_gmp\\_comments@nps.gov](mailto:glac_gmp_comments@nps.gov)

(over)

#### Glacier Park Foundation (Gilbertson)—0574

1. We currently do not have the authority to do as you suggested, and this is why it was considered but rejected. However, the Department of the Interior is exploring additional authorities to enter into entrepreneurial partnerships.
2. After the general management planning process has been completed, a commercial services plan will be prepared in which economic feasibility will be considered. Opening Lake McDonald Lodge and the Village Inn year round is not our preferred alternative.



COMMENTS

RESPONSES

0604

1 The next speaker is Janet Cornish.

2 JANE CORNISH

3 MS. CORNISH: Thank you for the opportunity to

4 speak. I'm Janet Cornish, and I'm speaking with a number

5 of different hats on. I'm on the Board of Directors of

6 the Glacier Park Foundation. The Glacier Park Foundation

7 was founded by employees of Glacier Park, primarily

8 concession employees, although there are some national

9 park employees and park visitors that are members as well.

10 We were formed in 1980, with the focus on the preservation

11 and maintenance of the historic hotels in Glacier National

12 Park.

13 I'm also with a nonprofit organization that works in

14 community development and heritage planning called

15 Community Culture and Heritage, and I'm a consultant with

16 Community Development Services of Montana.

17 My comments are those that are sort of a melding of

18 the view of the Glacier Park Foundation Board of Directors

19 and with some, some of my own thoughts thrown in. And

20 I'll try to note when those are different at all from the

21 Foundation's point of view.

22 I would like to first of all say that I was very

23 pleased with the Draft Management Plan. Like many of you

24 here, I've been able to participate and review a number of

25 previous planning documents that were published in a

Glacier Park Foundation (hearing, Cornish)—0604

## COMMENTS

## RESPONSES

1 series of newsletters by the National Park Service over  
 2 the last couple of years. And I know some of the issues  
 3 that were raised in those newsletters early on created a  
 4 lot of controversy around the state and country for all of  
 5 those of us who feel strongly about the park. And I. I  
 6 believe that this current draft is very reflective of a  
 7 lot of the concerns that were raised by the members of the  
 8 public, and I want to applaud the planning staff for  
 9 trying to be as reflective and inclusive of those concerns  
 10 as they could be.

11 I would like to make my remarks this evening, though,  
 12 specifically directed to the portions of the plan that  
 13 address the historic hotels in Glacier National Park. I  
 14 would like to speak in favor of the preferred alternative,  
 15 which is to preserve and restore the hotels, which are, in  
 16 themselves, a very important resource in interpreting the  
 17 history of the park and its ties to the American national  
 18 park movement.

19 The Great Northern Railroad built those lodges as  
 20 destinations for their passengers, with the exception of  
 21 the Lake McDonald Lodge, which they acquired. And those  
 22 hotels brought visitors to the park, but also helped form  
 23 an important partnership between the railroad interests  
 24 and the conservationists in the early part of the century  
 25 and to promote the national park concept. They are also

COMMENTS

RESPONSES

1 places where people can enjoy the park. And for those  
 2 people who either do not wish to or cannot camp, they  
 3 provide a place to stay in the park for visitors of all  
 4 ages. And in that way, they provide an accessible form of  
 5 enjoying the park in a very unique kind of way.

6 But within that alternative, I have a few changes  
 7 that I would like to suggest in the plan. First of all,  
 8 the plan takes a series of funding alternatives and  
 9 reviews them. But then places some of them in the section  
 10 called financing alternatives or alternatives considered  
 11 but rejected. And I would like to see at least those put  
 12 back into consideration, while not necessarily endorsing  
 13 any of those funding mechanisms, per se. But noting that  
 14 they are possible to review and perhaps saying that. That  
 15 in the course of evaluation of various funding mechanisms  
 16 that might be used to renovate the hotels, that those  
 17 options to be considered at some level.

18 While we support the Park's hope to achieve  
 19 congressional funding for the renovation of the hotels and  
 20 the acquisition of necessary interest of the  
 21 concessionaire, we also recognize that that may not be  
 22 feasible or politically possible and therefore would  
 23 encourage a continuation of consideration of other  
 24 mechanisms.

25 The other -- another issue, the lodges were built as

## COMMENTS

## RESPONSES

1 a system. And they included not only the hotels within  
 2 the park itself, and the chalets, but also Glacier Lodge  
 3 on the -- Glacier Park Lodge on the east side of the park  
 4 and the Prince of Wales in Canada. And while those aren't  
 5 necessarily under the same jurisdictional control, the  
 6 concession does work as a system. And again, in analyzing  
 7 financial strategies for their preservation, you have to  
 8 look at revenue streams that come from all the different  
 9 units and how that can be employed and a revenue stream  
 10 and the way in which visitors travel through the park, all  
 11 of those issues would go to developing a fairly concrete  
 12 approach to the financing of the hotel renovations.

13 So only looking at the lodges within the park is  
 14 probably all that the Park Service can do officially. But  
 15 I think that there should be some recognition that they're  
 16 part of a system that includes a couple of facilities  
 17 outside the park boundaries. And perhaps even to the  
 18 extent of where Sperry and Granite Park chalets, which  
 19 have special separate values and offer a different kind of  
 20 experience, might even -- there might be some  
 21 consideration of how do those two relate. And I'd like to  
 22 see perhaps some connection made of all the visitor  
 23 accommodations in the park in some way.

24 Finally, I just pose this as a question, and I would  
 25 be interested perhaps later in the question-and-answer, if

1. Please see the revised section on "Preservation of Historic Hotels and Visitor Services: Issue" in volume 1 of this final document.

COMMENTS

RESPONSES

1 there's any opportunity for that. to discuss how the  
 2 current -- the proposed and I think enacted changes to the  
 3 concession laws. or I think the President signed them. of  
 4 how that might affect the process and whether that goes  
 5 to -- or may help or hinder the process and address that  
 6 as part of some of the impacts of actions that are being  
 7 suggested in the plan with regard to the hotels.  
 8 then I have one other little small thing -- And all  
 9 of what I've just mentioned is basically reflective of the  
 10 Glacier Park Foundation's point of view, as well as my  
 11 own.

12 Another thought that I've been thinking about is with  
 13 regard to Going-to-the-Sun Road. And without offering any  
 14 particular point of view as to its construction schedule  
 15 and whether it should remain completely closed or  
 16 partially closed, one of the elements that we may want to  
 17 look at is opportunities to promote other parts of the  
 18 park during the construction period and then perhaps  
 19 afterwards as well.

20 And one of the thoughts I had is to look at the  
 21 corridor which connects Lake with Mary Glacier and that  
 22 there might be an opportunity to work on that corridor as  
 23 sort of to provide a heritage route. if you will, where the  
 24 National Park Service and the Blackfeet people could work  
 25 together perhaps in developing the history of the, the

2. Encouraging visitors to go to other parts of the park and vicinity is an idea that will be considered during further planning for the reconstruction of the Going-to-the-Sun Road.

2

## COMMENTS

## RESPONSES

2

06/05

1 Blackfoot in the area, and perhaps in conjunction with the  
2 Museum of the Plains Indian.

3 To explain, right now, I think there's a very  
4 distinct border that exists between the park and the  
5 Reservation and that we see missing perhaps an opportunity  
6 to share information, to learn about the Blackfoot Nation,  
7 and share that with the public. And that corridor might  
8 be a place to do it, as well as the historic mining town  
9 town, which is at the place closest to Jimmy Glacier.  
10 There's some interpretive possibilities there that might  
11 be explored as a new destination area in the park.

12 That's all. Thank you very much.



1156

Glacier Park Foundation (11/23/98)—1156

GLACIER PARK FOUNDATION, Inc.

P.O. Box 6642  
Missoula, Montana 59711  
(406) 338-8788

November 23, 1998

David Mittelle  
Superintendent  
Glacier National Park  
West Glacier, Montana 59236

Dear Mr. Mittelle:

The Glacier Park Foundation's Board of Directors has carefully considered the Draft General Management Plan (GMP) for Glacier National Park. We commend the Park Service for its work.

The Glacier Park staff has done an exemplary job of responding to public criticism of early drafts of the Plan. The focus groups which you assembled on key issues were very useful. Your staff has been extremely conscientious in reviewing public input, in providing information and in working to build consensus. Gary Biddle, Steve Pope, Jan Knox, Lucy Fredrick, Beth Farnham and others have been accommodating and excellent. We have enjoyed all our contacts with them.

We strongly endorse the basic philosophy set out in the GMP. Your commitment to "keep Glacier as it is" and preserve traditional patterns of use has overwhelming public support. The status quo is a well-balanced, environmentally responsible baseline for management in Glacier (the war research Memorandum of June 17, 1987).

The Draft GMP's "preferred alternatives" are reasonable and well-conceived. We have some reservations, critiques and comments to offer on these alternatives, as stated below; however, we commend you for this balanced and well-considered management plan.

**A. The Need to Set Financial and Planning Priorities**

Cost estimates for the NPS' "preferred alternative" total \$267,000,000 in 2024/04/04/04 (pp. 283-284). It seems extremely unlikely that Congress will appropriate a quarter of a billion dollars for Glacier. Hard-headed prioritizing is needed to channel "five dollars" to some urgent projects.

## COMMENTS

## RESPONSES

David Minkoff  
November 23, 1998  
Page 2

But Road construction and lodge renovation are clearly the Park's most urgent activities. The Draft GMP and underlying documents state the risk of catastrophic failure in sections of the road used in the Park's historic lodges (see, e.g., pp. 30, 34, 36). Available funds should be prioritized to deal with these problems.

The West Side Discovery Center (\$15,000,000), while desirable, is clearly a less urgent project. Devils Creek facility restoration (\$10,000,000) also seems to us to be a less urgent priority than maintaining the road and the major lodges. These less urgent projects should be deferred until after the stabilization is done.

Deferring these projects is important not just for financial reasons but also in order to focus Park Service energy. The urgent projects require many preliminary studies (pp. 43, 44, 55). The Glacier Park staff and the public alike should focus on solving these vital problems before moving on to less pressing items.

#### B. Lodge Renovation

We strongly approve of the general approach that the Draft GMP takes to lodge renovation. We especially commend its commitment to historic preservation and its affordability for the general public as key values for the Plan.

We are pleased with the systematic approach to lodge renovation proposed in the Draft. The commitment to site-specific planning is very important to the integrity of the preservation work (p. 33). The proposed feasibility study is a sound approach for producing a renovation plan.

The Draft GMP very properly deals with the lodge renovation issue only in broad conceptual terms. We look forward to offering detailed comments on renovation of the lodges as the planning process unfolds (see our Preliminary Memorandum on Planning the Renovation of Visitor Facilities in Glacier National Park, 10/98). In the broad context posed by the GMP, we offer the following brief observations:

##### 1. Alternative Funding Strategies

We strongly endorse the proposed alternative (the "Yellowstone model") whereby the National Park Service would buy the concessionaire's interest in the lodges, fund all preservation work and then grant fifteen year-term contracts on a management-only basis (p. 15). This plan depends upon a very large Congressional appropriation.

COMMENTS

RESPONSES

David Minkoff  
November 23, 1998  
Page 3

Congress may not grant these funds. If it, therefore, could (not alternative financing strategies (discussed out in Appendix C, pp. 281-282) be very actively developed from the start of the planning process.

From our present perspective, a bond issue seems to be the prime alternative for raising funds on the necessary scale without unduly taxing the public. A tax-exempt bond issue (which would constitute state) apparently would require enactment of the Federal Tax Code (See our Preliminary Memorandum, pp. 13-14). It may be possible to amend the code to help address similar problems relating to many National Parks.

A tax-exempt bond issue under existing law would raise substantial funds (See our Preliminary Memorandum at p. 14). Feasibility studies and strategies planning should carefully explore this alternative.

Other possible sources of funds should also be closely reviewed by the feasibility study (See our Preliminary Memorandum, pp. 14-16 and Appendix Table A). Financing strategies listed in the Draft GRIP as "submitted but rejected" (pp. 14-17) should be left open to possible reconsideration. The viability of these strategies in the Draft GRIP is generally sound. But if the preferred bond-issuing strategies prove infeasible, creative proposals in other categories (e.g., non-profit ownership) should be considered.

**2. Prioritize Rehabilitation Work**

As we stressed in our earlier memorandum (pp. 3-8), future planning should prioritize various restoration projects. It seems unlikely that Congress will authorize the full amount (\$80,000,000.00 to \$100,000,000.00) required to accomplish all the projects that are presently being considered.

Restoration work should be rated according to urgency: e.g. (1) life-safety work, (2) structural stabilization, (3) infrastructure restoration, (4) upgraded employee housing, (5) operational improvements and (6) historical and archeological restoration (See pp. 5-8). In many cases, efficiency may obtain doing some of the less urgent work in conjunction with more urgent work. But for the most part, "fast dollars" should be directed to more urgent work.

Rehabilitation should be a focus of the general feasibility study and of the specific plans. It is crucial to plan the work to match the size of projected revenue streams.

1. The preferred method of funding would be to seek federal appropriations to buy the concessioner's possessory interest in the structures and complete the rehabilitation. It is also recognized that federal appropriations may not be forthcoming for some or all of the work necessary. Therefore, alternative A includes an action to be taken to explore other funding methods. It may be that a mix of funding methods would have to be used to fund the work on one or all of the properties. Appendix D outlines some of these funding methods, including issuing a bond. Other methods are addressed in the section on "Alternatives, Ideas, and Strategies Considered but Rejected." Appendix D (formerly appendix C) has been modified to correct contradictions about the selection of a funding method alternative.

We understand that the Glacier Park Foundation does not plan to undertake a feasibility study. The feasibility of funding alternatives will be analyzed as part of the implementation planning effort outlined in "Actions to be Taken" under alternative A.

2. Alternative A has been modified to include developing a plan to prioritize and phase the rehabilitation work.

1

2

COMMENTS

RESPONSES

Draft EIS/IS: November 23, 1993 Page 4

3. GPO's Financial Considerations

It has come to our attention late in the public comment period that a proposed campaign is being waged with regard to the funding of recreation needs. Glacier Park, Inc. (GPI), the hotel subcontractor, apparently has circulated materials to many former hotel guests.

The proposed hotel provides two options: "taxpayer financing" and "expanding other alternatives... including private investment." The cover letter states:

We at Glacier Park, Inc. support funding of the \$60-100 million in needed improvements through our resources and private investment. ...We also believe that it is the private owner's responsibility to invest the funds necessary to improve the facility rather than the American taxpayer.

This is a grossly overstated proposition. The latter does not explain that private financing by GPI would result in increased income to cover the cost of the services which would exclude many middle class travelers.

3

We urge that the Park Service tabulate results obtained from the proposals separately from other responses. Many people who casually check off a box suggest "taxpayer financing" might reconsider if they knew that private financing would double most other costs. The incomplete information skews the data provided by this campaign.

C. Going-to-the-Sun Road Reconstruction

We examined the MPQ for developing two well-considered approaches to a difficult issue: the "fast-track" and "accelerated" options (Draft OME, pp. 49-50). Having followed the debate on these proposals, we encourage further study and consideration of a comparison between the options.

4

We encourage expansion and development of shuttle bus service during the recreation period. The public may be more open to using shuttles while the Road is partly shut down. Shuttles might be given priority to travel through construction areas at some stages.

5

Interpretive signs should be expanded on Park roads which are free from reconstruction. The Ball-to-Mary Glacier route could be enhanced as an interpretive corridor, perhaps in conjunction with the Electric Trail.

3. We appreciate the concerns some people have raised about the quality of the information received from the questionnaire distributed by Glacier Park, Inc. Each response will be entered into the public comment record. We recognize that responses might (or might not) have been different if the questionnaire had been crafted differently or contained more background information. Any person may comment on a draft general management plan regardless of their understanding of all aspects of the issue. Many people contacted by Glacier Park, Inc., requested copies of the *Draft General Management Plan* or the *Overview* so that they could understand the issues better before commenting. The comments we heard from the public (including the postcards) is summarized under "Why Do We Need A Plan?: Public Involvement on the Draft General Management Plan and Environmental Impact Statement" in volume 1 of this final document.
4. The idea of expanding shuttle service will be considered as additional studies are prepared for reconstruction of the Going-to-the-Sun Road.
5. Please see the responses to the comments of your organization's Janet Cornish, above.

David Mullan  
November 23, 1998  
Page 3

6

San Point would be used as a theme for expanded interpretive opportunities (e.g. more interpretive signs and short guided hikes) while higher parts of the Road are closed. San Point has a large, well-maintained parking lot, a rich history and excellent vantage points for interpretive talks.

**D. Other Issues**

We strongly endorse here on the site, commercial overnight and overnight use within the Park. We oppose more development in the Park unless compelling reasons are shown for it.

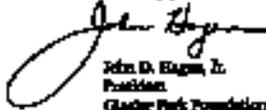
We support the present reference to "backcountry" rather than to "wilderness" in the Plan. We are aware that some groups oppose this terminology and want to see "wilderness" used to guarantee maximum preservation of the Park.

GFF strongly endorses a preservation ethic to Glacier's backcountry. We think that the final GMP provides for this (defining "backcountry" as a "practically pristine natural condition") (p. 21).

"Wilderness" designation could raise unforeseen problems under the Wilderness Act (which defines "wilderness" as "without permanent improvements or human habitation") (16 U.S.C. §1131). If this term were interpreted to require removing, e.g., backcountry facilities, the Passenger Terminal complex, the stone shelter on Cascade Pass, the historic mining artifacts at Cracker Lake, or abandoned fire lookouts, cabins and ranger stations, it would be too inflexible. Such issues should be reviewed carefully in considering a formal "wilderness" designation for Glacier's backcountry areas. For the present, the use of the term "backcountry" (as defined in the GMP) seems to be reasonable and environmentally responsible.

Again, we commend you for a concise, well-considered and thoughtful Plan. We look forward to working with your staff on implementation of the GMP.

Sincerely yours,

  
John D. Eagan, Jr.  
President  
Glacier Park Foundation

JDE/PL

- 6. After the *General Management Plan* is completed, a comprehensive use plan for the Going-to-the-Sun Road will be prepared. That plan will address interpretive opportunities throughout the corridor.

COMMENTS

RESPONSES



**GLACIER PARK INC.**  
A Wild Day Company

*Yvonne Smith*  
DR

02.07



September 20, 1985

Mr. Charles R. Fontana, Jr.  
Acting Superintendent  
National Park Service  
Glacier National Park  
West Glacier, MT 59923

Re: General Management Plan

Dear Bob:

First, let me applaud you and your team for the modification to the General Management Plan affecting the 'Going to the Sun' road alternatives.

The modification to the specific alternatives for the 'Going to the Sun' road, in allowing more of a natural approach to be determined before specific recommendations are agreed upon, clearly makes us in being supportive of your conclusions.

I would now like to comment on the other issues within the General Management Plan which devolve us as your primary concessionaire and that is the maintenance of the historic lodges.

We don't feel that other alternatives as presented

1. Are fed to the American taxpayer.
2. Would get the job done in a timely basis.

In fact, I suggest, there is a third alternative, one of which we have discussed many times, and that is, allowing the private sector to place the investment. In other words, concession, GPT.

Allow us to be charged with the responsibility of fixing our own financial resources to completely rebuild the Mary Oliver property and, for that matter, all the facilities within Glacier National Park. We would like to see this process for an extensive feasibility study. Considering past records and similar, indeed, there is a demand for an integrated system of alternatives which would help finance the program. The feasibility study would also determine what facilities and services are needed to attract guests, and for that matter employees, for a stay in October season.

These conditions would revolve around an integrated concession contract, a right to compulsory interest to possess the equipment, and to make debt, the concession of facilities pricing enough so that we can generate the service both our debt and equity.

Buy 87-566-848-848 Box 141, Box Glacier Park, Montana 59704-0147  
Ombudsman 408-344-3444 Contact Person, Phoenix, Arizona 85077-8528

Phone 408-344-3444 Fax 408-344-3444  
Phone 408-344-3444



Glacier Park, Inc.—0269.

1. Please see the responses to the comments of the Glacier Park Foundation. The current law applicable to concession operations in national parks limits contract terms to 20 years. It also provides a leasehold surrender value to compensate concessioners for their rights of ownership in structures. This value is based on the cost of original construction, increased with the Consumer Price Index and less depreciation.

COMMENTS

RESPONSES

Didn't, again we would like to thank Mary Finkle, your team leader, and yourself for your leadership in these issues and we would be more than happy to work with you especially to discuss the dynamics of your organization.

Warmest regards,



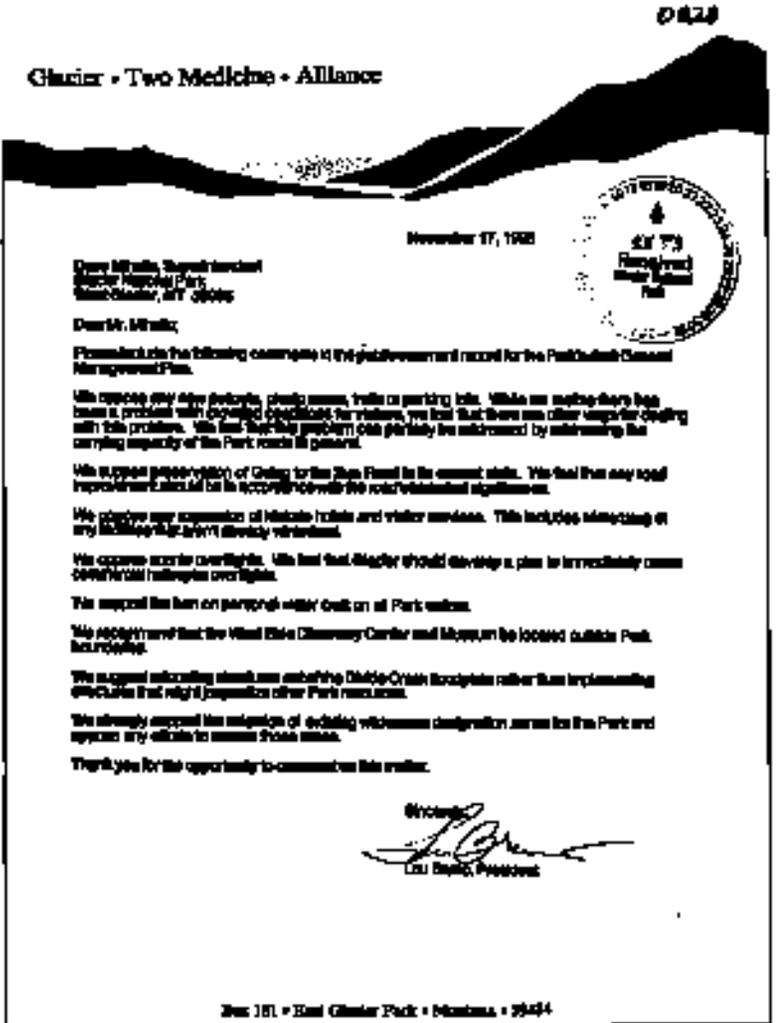
R. Dale Sims  
President and General Manager

ROSE,

cc: Mr. Joseph Pinner, President & CEO, Pentium

COMMENTS

RESPONSES



Glacier-Two Medicine Alliance—0828

Thank you for your comments.

COMMENTS

RESPONSES

Glacier-Waterton Visitors Association (Brook)—0518

9 WILL BROOK: For the record, my name is Will  
10 Brook. I'm one of the owners of the St. Mary/Glacier Park  
11 Inn complex, and I appear here today on behalf of the  
12 Glacier/Waterton Visitors Association.  
13 I'd like to commend the Park Service for dealing  
14 with the issues of the Going-to-the-Sun Road. I think too  
15 many of the prior administrations have skirted the issue. We  
16 recognize that the road has to be dealt with and that there  
17 is problems with the road, repair problems, maintenance of  
18 it that need to be dealt with. We, however, do not believe  
19 that the proposed preferred alternative is appropriate at  
20 this time.  
21 Management Plan is a general planning document  
22 used by Federal agencies to allow the public to be involved  
23 in and participate in the planning and future use of  
24 Federal land—Federal land in the park. Part of the Glacier  
25 Management Plan lays out general goals and objectives, but

BOGARDUS REPORTING (406) 343-4828  
W.O. Box 1102 Whitefish, MT 59917

COMMENTS

RESPONSES

1 the section for the Going-To-The-Sun starkly contrasts this  
 2 approach as a site specific major Federal project with huge  
 3 significant impacts and, accordingly, it should be dealt  
 4 with in a different kind of manner. We do not believe there  
 5 was proper public scrutiny of the road issue and,  
 6 specifically, that there has not been adequate engineering  
 7 studies done at this time to make the kind of preferred  
 8 alternative that is proposed in the plan.

9 The plan is very specific in terms of the time and  
 10 date that the road would be closed and how it would be  
 11 closed. We think that's premature at this time.

12 Accordingly, we would request that the Park  
 13 Service put forth a new alternative which is a more general  
 14 preferred alternative that recognizes first that the  
 15 Going-To-The-Sun Road and use of it by vehicles is  
 16 appropriate; that there are problems with the road in terms  
 17 of repair and maintenance and that these need to be dealt  
 18 with over the long-long haul. But that due to the kind of  
 19 engineering studies that will allow them to make the  
 20 appropriate choice and give us the preferred alternative  
 21 with a basis. It may be that the proposed alternative by  
 22 the park in the end will be the correct alternative, but we  
 23 don't know that at this time given the information that  
 24 there is.

25 Secondly, there's a discussion of the Federal

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1. Please see the responses to the letter from Senator Burns.

COMMENTS

RESPONSES

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47

1 ownership of historic lodges and hotels. And the General  
 2 Management Plan, while it talks about the cost of  
 3 maintenance to bring those old hotels and lodges back up to  
 4 speed, it does not talk about the cost of acquiring the  
 5 interest of the present concessionaire in those hotels. I  
 6 think that that ought to be included so that the public can  
 7 be fully aware of the kind of cost that the Park Service is  
 8 contemplating in the acquisition of those hotels and lodges  
 9 under their preferred alternative. We do not believe that

10 that is a proper alternative or proper use of taxpayer  
 11 dollars. The Park Service has admitted they have problems  
 12 with funding and maintaining the capital improvements like  
 13 Going-To-the-Sun road that they presently have, not only in  
 14 Glacier but across the country. It does not make sense to  
 15 add additional burden to that cost. And that's what is  
 16 contemplated by the proposed alternative.

3

17 Accordingly, we would request the Park Service get  
 18 rid of that alternative and consider a better alternative  
 19 for funding based on the private sector rather than trying  
 20 to acquire lodges that there is little congressional support  
 21 or public support for acquisition of.

22 That's all I have, and we will submit additional  
 23 written comments to supplement the public record. Thank  
 24 you.

25 **ROBERTS OFFICE CHAIR:** Thank you.

ROBERTS OFFICE CHAIR (404) 843-4188  
 P.O. Box 1142 Whitefish, MT 59907

2. The preferred alternative under "Preservation of Historic Hotels and Visitor Services" has been revised. The cost of acquiring the concessioner's possessory interest is not known at this time. The process of determining such a value would involve appraisals and ultimately negotiations between the National Park Service and the concessioner.
3. Most of the comments on preserving historic hotels and visitor services supported the preferred alternative. Please see the revised alternative A mentioned in response 1, above, regarding other funding sources.

COMMENTS

RESPONSES

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24  
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**MIKE LABRIOLA 04/91**  
**MIKE LABRIOLA: My name is Mike**

Central Montana Reporting  
(866) 427-8550

20

1

1 Labriola, I'm executive vice-president of the  
2 Great Falls Chamber of Commerce. The Great Falls  
3 Area Chamber of Commerce supports the view that a  
4 decision on closure of the Going-to-the-Sun  
5 Highway should be held in abeyance until  
6 completion of the federally-funded engineering  
7 study that Congressman Hill has arranged for. The  
8 results of that study should be considered in  
9 weighing the options for repair of the  
10 Going-to-the-Sun Highway. Thank you.

Great Falls Chamber of Commerce (Labriola)—0491

1. Please see the responses to the letter from Senator Burns.



COMMENTS

RESPONSES

Don't screw up America's best national park!  
@9911 Turner  
Vice-president, Great Northern Railway Electrical Society  
2218 140th St SE  
Edmonds, WA 98026-4284  
garucky@msn.com

COMMENTS

RESPONSES

0892

Control Num	Date	File No.	Page
West Gateway to Glacier National Park of Transition of Highway 12 and Going-to-the-Sun Highway			

**HUGH BLACK ST. MARY ENTERPRISES, Inc.**  
 211 WEST 12TH

Post Office: Bozeman, Montana NOV. 17, 1998  
 Telephone: 406-552-2424 FAX

OFFICES  
 Glacier National Park  
 West Glacier, Mt. 49926

Development

This is in response to the draft "General Management Plan and Environmental Impact" statement

My son, Bruce Black, wrote to you on Nov. 3, 1998 regarding this plan and I believe that he has stated the concerns not only of the people closely connected with the Park but of families throughout our country. Closing the Sun Road will have a significant, detrimental impact on all of Montana, as well as all its people, economically.

Congressional funding has been secured for additional engineering studies and it is essential that those studies be done before an alternative plan is selected.

Our family has been closely connected with the Park and the Park Service for over 70 years and want only the best for it and I strongly urge you to give someone letter to you of Nov. 2nd some consideration.

Best Sincerely,  
*Hugh Black*  
 Mrs. Hugh Black



Hugh Black St. Mary Enterprises, Inc.—0892

1. The preferred alternative for preservation of the Going- to-the- Sun Road has been revised; please see alternative A1.

COMMENTS

RESPONSES

John L. Clarke  
1113

1113  
John L. Clarke  
Western Art Gallery  
Memorial Museum

*John L. Clarke Western Art Gallery & Memorial Museum*

November 28, 1966

Superintendent  
OS/MS Project  
Glacier National Park  
West Glacier, MT 59936

Dear Superintendent:

I saw and operate the art gallery from May through September at the western edge of Glacier Nat'l. Park, and just finished my twenty-first season and I am quite concerned about road closures for repairs that the Park Service is planning to do on the Going-to-the-Sun Road.

I attended a meeting on Monday on October 24th and suggested that rather than close the road on one side for two weeks (1) that the other side for about five years, instead repair work could be done at night as much as possible in 1967, if at all, and a few years ago. Most of the road is one-way traffic. If the cars are held up on a one-way street, they will be able to cross the Sun Road and get to the other side of the road. I am surprised anyone that it can be done. It is the east and west sides. Probably the Sun Road is the only road that provides Glacier.

The impact of closing the Sun Road to through traffic would be devastating to the surrounding towns that provide accommodations for the tourists, and it would be felt in the string area towns as well. Without the surrounding towns providing services, the Park Service wouldn't be able to accommodate the top million visitors that Glacier Park attracts every year unless it would turn into a development. It wouldn't that defeat the whole purpose of keeping GNP as a wilderness park and having impact on the ecosystem, wildlife and all the features that make GNP so attractive?

I suggest that the Park Service wait until the engine weather side will appreciate that will be easy to find with the repair costs, and that it involves the down first, and after the engineering results are in, have additional meetings. The repair work on the Sun Road is going to cost many thousands, and I think the less time is taken to accomplish this, the better it will be for all concerned, and there will be less impact on surrounding towns and businesses.

John L. Clarke Western Art Gallery and Memorial Museum—1113

1. Please see the responses to the letter from Senator Burns.

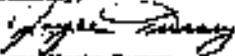
COMMENTS

RESPONSES

And, I don't think the green of old trees should be sacrificed to make more room for parking near available. Once they are cut down, they can never be replaced and that's hard on us. There must be a better plan for additional parking, and if additional parking necessary!

I think and hope that there could be a feasible and workable solution that would work for the Park Service as well as the many businesses situated outside the park boundaries.

Sincerely,



James Clark Turvey

## COMMENTS

## RESPONSES

09/11

November 4, 1999

Representative  
Glenis Matheson Park  
FMP/EZH Project  
West Glacier, MT 59906

Dear Sir:

The Last Chance Backcountry Horsemen, a member chapter of the Back Country Horsemen of Montana offer the following comments of the proposed General Management Plan.

1. First and foremost we encourage management to recognize the historical role and use of horses and mules in the Park. Trails were constructed and developed to provide the protection, patrol and access for visitors to Glacier's remote trail country.

2. We urge that trailheads be developed and use should be encouraged and located commensurate with protection of wildlife and land resources. Trails should be maintained and back country camp areas maintained to comply with wilderness standards (LAW).

3. The majority of the Park has wilderness qualities and should be managed as wilderness and Congress designate those lands as wilderness classifications.

Representatives of our organization attended the hearing on the draft proposed on October 11th at Helena, MT. At our November meeting we reviewed the Alternatives and support the following:

- Oaking to the Box Road - "A"
- Preservation of Oaking to the Box Road - "A"
- Preservation of historic hotels and visitor services - "A"
- Snake Air Drive - "A"
- Personal water tank (as defined) - "A"
- Winter use - "C"

- maintain the closure to construction and include all-terrain vehicles
- Divide Creek Road Lower - "A"
- West Side Discovery Center and museum - "B"

We appreciate the opportunity to participate in the process and comment.

Sincerely,

Bill Madole/jk

Bill Madole  
Local Chairman  
Last Chance Backcountry Horsemen

## Last Chance Backcountry Horsemen—0971

1. Park use and development are described under "Affected Environment: Cultural Resources," and background information about historic hotels and visitor services is given in the section on "Preservation of Historic Hotels and Visitor Services."
2. We agree with your thoughts about trailheads and backcountry camp areas. These issues are a part of the park's "Backcountry Management Plan." The results of monitoring are delineated each year in the annual "State of the Backcountry" report.
3. Please see the responses to the comments from the Montana Wilderness Association and the Wilderness Society. Also please see the general response regarding wilderness.

COMMENTS

RESPONSES

Ref: 011 44-2100

SEP 26 1994

Page 02

Box 4  
Waterton Park, Alberta  
T0K 2G0  
Toll Free 1-800-661-LODGE  
Phone (403) 939-5124  
Fax (403) 939-5124



01, 002 - 1A Street E.W.  
Calgary, Alberta  
T2C 0C9  
Phone (403) 249-6222  
Fax (403) 249-2138  
e-mail: info@watertonpark.com

0162

September 26, 1994



Office of the Registrar  
Climate Action Unit  
1000 - 100th Street  
Edmonton, Alberta  
T6E 0K6

Dear Sir,

Re: **Special Management Plan and Development Program Approval**

In reviewing the draft form of the above mentioned plan and program, we wish to highlight some more appropriate options that would be better for the environment and tourism.

1  
2

- **Change to the site plan** - A small change would not be appropriate. The original environmental impact study was approved based on the site plan as it is. Any change to the site plan would require a new environmental impact study. We recommend that the site plan be approved as is. If you wish to make any changes, you should consult with the environmental impact study consultant.
- **Special Management Plan** - Although we support the development in the Park, we believe it is very important to ensure that the development is done in a way that is compatible with the natural environment. We recommend that the development be done in a way that is compatible with the natural environment. We recommend that the development be done in a way that is compatible with the natural environment.

We appreciate an opportunity to have input into the plan and look forward to providing follow-up assistance through the remaining process.

Yours truly,

**THE LODGE AT WATERTON LAKES INC.**

M. J. Macdonald  
President

cc:

1-4. Chair Waterton Valley Association - Approval Report Request  
Climate Change Action Unit - Attention: Doug Macdonald

The Lodge at Waterton Lakes—0162

1. Please see the responses to the letter from Senator Burns.
2. Your statement is incorrect. The preferred alternative for “Preservation of Historic Hotels and Visitor Services” allows for upgrading and modernizing the facilities in the park if it can be done without affecting the integrity of the hotels and other buildings as national historic landmarks and national register properties.



1191

**Montana Aviation Trades Association**

FOIA b7  
b7C  
b7D

Montana  
10-20-2014

November 20, 2014

Mr. David M. Mink, Superintendent  
Glasier National Park  
Wind Glacier, Mt. 50926



RE: Comments on wind-turbine siting at Glasier National Park

Dear Superintendent Mink,

Montana Aviation Trades Association (MATAs) is opposed to the construction of air towers in Glasier National Park for the following reasons:

1) Airspace in the United States is controlled by the Federal Aviation Administration (FAA)

2) As the management of Glasier National Park is now, the federal government assumed an Aviation Reliability Advisory Council (ARAC) working group to address the issue of air towers over national parks. The ARAC comprised of nine members, has worked the issue for 18 months to design a set of recommendations on new federal regulations on air towers at national parks. Four members of the working group represent various aviation interests. Two are directly involved in the air tower industry, four members represent various National Park Service and/or environmental interests and one member represents the Native American community. The ARAC working group agreed on a set of guidelines whereby all four agencies, National Park Service, Federal Aviation Administration, environmental groups and other local interests would convene in a planning process to identify the extent to which air towers at a particular national park would be compatible and how air towers would fit into the overall park picture.

1 [Redacted text]

Glasier National Park is premature in its conclusion that air-tower should be banned, particularly in view of the ongoing process to develop guidelines for air towers over all national parks in the United States.

2 [Redacted text]

3) Glasier has not conducted any surveys or studies to justify its conclusion that air towers negatively impact wildlife and should be banned. However, there are

Montana Aviation Trades Association—1441

1. Please see the responses to the comments of the United States Air Tour Association.
2. Please see the responses to the comments of the United States Air Tour Association.

COMMENTS

RESPONSES

2

sample studies which have been conducted in other locations that clearly indicate that air noise do not have a negative impact on wildlife.  
 Barbara Arlindo Taylor believes that by working together through the ANAC working group, management and the air line operators, the public would be better served and the public confidence preserved.

Sincerely,



Charles Tower  
Board of Directors

- CC: Jerry Maslovich, Deputy Hall-Team  
 Member Council House  
 Bruce Webb, Secretary of Director  
 Robert Shantz, Director, National Park Service  
 Rodney Weber, Secretary of Transportation  
 Jack Garvey, Administrator, Federal Aviation Administration  
 Michael Bergstein, Administrator, National Aeronautics

COMMENTS

RESPONSES



Friday, October 24, 1998

Glacier National Park  
West Glacier, MT 59936-0001

To: [Redacted]

From: [Redacted]



Subject: [Redacted]



[Redacted]

[Redacted]

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[Redacted]

[Redacted]

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Montana Computer Wholesalers—0368

1. Please see the responses to the comments from The Equinox.
2. For most visitors, driving the Going-to-the-Sun Road is the premier highlight of visiting Glacier National Park. It is also a significant factor in the economic health of northwestern Montana. Clearly, there would be little support for a decision to not repair the road. The park already limits vehicular traffic on the road to vehicles less than 21 feet long and 8 feet wide. Buses are not allowed beyond Sun Point on the east side of the park and Avalanche on west. The park is very interested in relieving congestion on the Going-to-the-Sun Road. As part of the preferred alternative, an efficient and convenient public transportation system would be provided. A federal subsidy might be necessary to accomplish this. An expanded transportation system for this road will be considered as part of a comprehensive use plan for the road.



COMMENTS

RESPONSES

0602

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STUART DOGGETT

MR. DOGGETT: Hello, my name is Stuart Doggett. I represent the MONTANA Innkeepers Association. We're a statewide organization, with memberships that include hotels, motels, campgrounds, bed and breakfasts, and other businesses who have an interest, purveyors, sales marketing consulting people, et cetera.

We're taking a good look at this time. But so far, there's a lot of concern and interest from our members, not only in the areas surrounding Glacier Park and the Kalispell/Whitefish region. We're also starting to hear comments from members outside of that area. Great Falls, Billings, et cetera. They're looking at this with concern, want to know more, because, as they'll tell you, Glacier, just like Yellowstone, is a destination area. People that come towards Glacier stop and stay. They'll stay in Lewisohn. They'll stay in even Wolf Point as they're coming from the Dakotas. They'll come up from West Yellowstone, go north through Missoula, up to Polson, and towards Glacier.

So it has a tremendous impact on the hotel/motel/innkeeping industry. And so we're concerned and we hope for positive, long-term management that takes in the concern of the national treasure that is there at Glacier, but the interests of some of those businesses that are so

11

Montana Innkeepers Association (hearing, Doggett)—0602

COMMENTS

RESPONSES

1 dependent on positive management of disaster.  
 2 Some of the concerns that have come up from our  
 3 members, one is a public relations issue. You may have  
 4 heard this before. Not when a final alternative is chosen  
 5 and the management scheme proceeds forward, we would urge  
 6 the Park Service to be most careful in how they choose the  
 7 words. Specifically, let's take going-to-the-sun highway.  
 8 As the road is managed and some sub-roads are made,  
 9 we're concerned about the perception that would be given  
 10 out nationally about the road being closed or closure of  
 11 the park.  
 12 What that would do, frankly, would keep people from  
 13 coming to disaster and enjoying a positive experience.  
 14 While there's a diversity of experiences there besides  
 15 going-to-the-sun, it would keep them from traveling and  
 16 possibly staying at tourism businesses or utilizing the  
 17 resources as they come, if that were not covered  
 18 properly. So we urge you to proceed with caution in the  
 19 public relations area.

20 Another concern that's been mentioned by members is  
 21 the inclusion of the going-to-the-sun Highway in the  
 22 latest EIS. Concern of why this was not included in the  
 23 first round and shows up in the draft that came out in  
 24 August. Questions about the engineering studies being  
 25 done in the final alternative, the fact that some believe

1. Please see the responses to the comments of the Coalition for Canyon Preservation.
2. Please see the responses to the letter from Senator Burns.

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COMMENTS

RESPONSES

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1 that maybe some engineering studies should be done. We  
2 understand that some congressional funding has been  
3 secured or is close to being secured, and we would urge  
4 you to take a good, close look at the issue.

5 In conclusion, our association is ready November 1st  
6 through the 3rd in Missoula, Montana. We'll have a board  
7 meeting and a general membership meeting, and I know this  
8 issue will continue to be discussed by our organization.  
9 And I would like to urge them at the time, as we get  
10 further on, to prepare and submit a letter before the  
11 November 1st deadline.

12 Thank you.

COMMENTS

RESPONSES

FORM 100-10000

FORM NO. : 00640000

FORM NO. 00640000

117



Montana Innkeepers Association - 11/30/98

November 30, 1998

Montana Innkeepers Association  
1000 West 10th Street  
Billings, Montana 59101  
Tel: 406-233-7700

Dear [REDACTED] Project Manager:

The Montana Innkeepers Association wishes to provide written comments on the Glacier National Park Draft General Management Plan and Supplemental Request Statement.

As indicated during our testimony on October 31 the Montana Innkeepers Association is a statewide organization composed of lodging industry professionals. We find that our guests are not interested in the draft plan by our members including Glacier Park and western Montana. The primary concern is that lodging facilities may be impacted in a negative way by the draft plan if visitors are discouraged from visiting and/or abandoning Glacier Park as a travel destination.

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Specific areas of concern that have been noted are: The first is the issue of public relations. Several agencies have expressed a legitimate concern that the Glacier Plan does not seem to clearly recognize and lay out a plan for supporting a positive image by the public during times when conditions are negative and being made in the Park. For example, we are concerned that potential visitors from across the nation will be misled that the park is "closed" and/or visitors will not find quality lodging facilities in Glacier Park.

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A second area of concern has been the intention in the draft plan to improve the driving to the Sun Highway which adequately recognizes the Federal Highway Administration, or any other credible source. It seems highly important that the plan include engineering information before a final decision is made on the new alignment for maintaining the driving to the Sun Highway. It has also been noted the routing has been made available from Congress for the Park. However, it is not clear what the routing has been made available from Congress for the Park. However, it is not clear what the routing has been made available from Congress for the Park.

FOIA(b)(7) - DELETED BY BUREAU - [REDACTED] - [REDACTED] - [REDACTED] - [REDACTED]

Montana Innkeepers Association (11/30/98)—1117

1. A mitigation strategy and marketing plan would be part of the additional engineering and economic analysis that would be conducted under the preferred alternative for preservation of the Going-to-the Sun Road. Regarding ongoing construction efforts, we would be happy to explore with your organization other ways to communicate with the public about the road reconstruction.
2. Please see the responses to the letter from Senator Burns.

COMMENTS

RESPONSES

FILE # 00000000

FILE # 00000000

FILE # 00000000

Thank you for the opportunity to provide these comments. Our organization will continue to review the Chester Park Management Plan and look forward to providing additional input.

Respectfully,  
  
Steve Goff  
Executive Director

## COMMENTS

## RESPONSES

18                   **RANDY GREY 0490**  
19                   **RANDY GREY:** Thank you for the  
20 opportunity to appear tonight. My name is Randy  
21 Grey, I'm a resident of Great Falls. I'm a  
22 lifelong Montanan. I'm also a trustee for the  
23 Montana Nature Conservancy, and whatever else you  
24 do -- and commend the park to what it's doing on  
25 this, but whatever else you do, kindly keep

Central Montana Reporting  
[495] 423-5529

Montana Nature Conservancy (Grey)—0490

COMMENTS

RESPONSES

13

1 Glacier in context of the rest of the environment  
2 north and south of Glacier Park.

3 MONTANA NATURE CONSERVATION has expanded  
4 substantial resources for the preservation of the  
5 Rocky Mountain Front, the preservation of the  
6 North Fork at the flathead, as well as the  
7 Continental valley down by Yellowstone Park. There  
8 is, very shortly north of Glacier in the Crow's  
9 West Pass area, an area approximately 50 miles  
10 wide which essentially is the lifeline of genetic  
11 exchange or genetic exchange of materials for the  
12 wolf and grizzly populations from Canada into  
13 Montana and down into Wyoming.

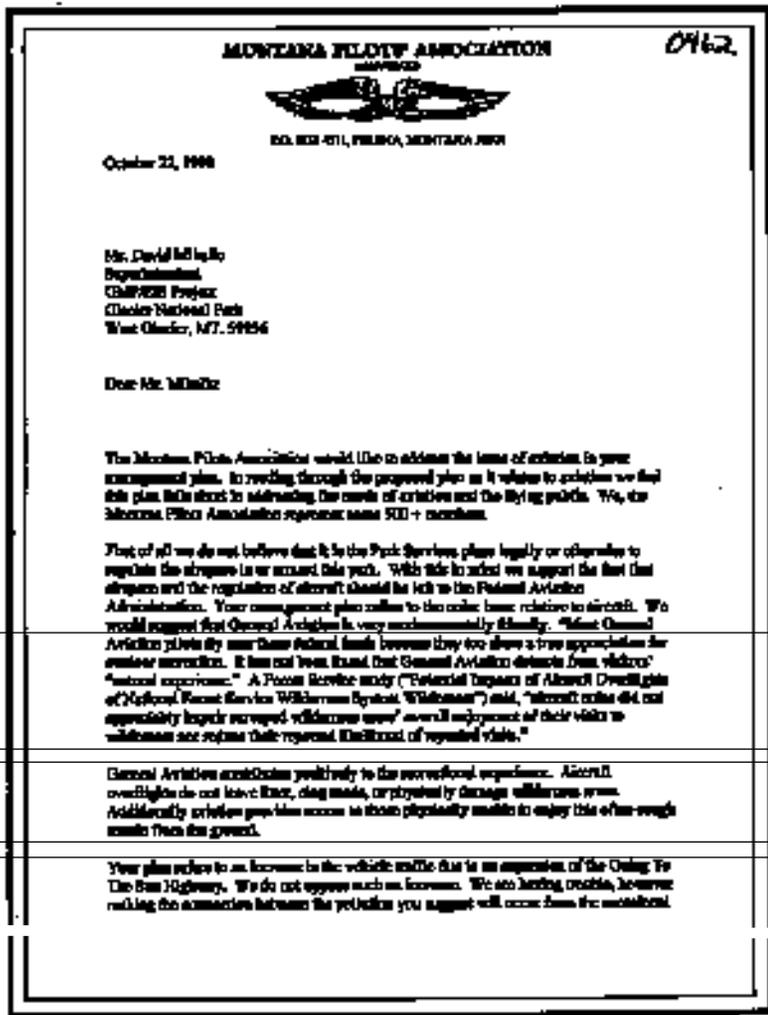
14 We urge the park to consider the larger  
15 context of Glacier Park management in light of  
16 what is going on in the Crow's West Pass area and  
17 the rest of that area presents, to the continued  
18 exchange of genetic materials from the wolf  
19 population north of there and the grizzly  
20 population north of there into Montana and into  
21 Glacier Park. Thank you very much.

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- 1. Please see the statement regarding the park's significance in a box under "Guiding Principles" in the front of the document. Also please see "Managing in an Ecosystem Environment" under "Guiding Principles" and the chapter on "Regional Cooperation." Glacier's *Resource Management Plan* also addresses these issues.

COMMENTS

RESPONSES



Montana Pilots' Association—0462

1. The National Park Service has not conducted a formal study to determine if air tour operations detract from visitor appreciation of Glacier National Park's values; however, the park has received numerous complaints that indicate that this is the case. The public response to the preferred alternative for scenic air tours has been overwhelmingly supportive.
2. We do not propose to prohibit all aviation activities over the park, only commercial air tours. The park receives few complaints that general aviation (private, noncommercial flights) detracts from visitors' recreational experience. We concur that overflights do not leave litter or clog the roads and that they provide access for some people who are physically unable to explore the park on foot. However, much of the park's spectacular beauty can be enjoyed from roads (see map on page 58 of the draft document).
3. Air pollution from emissions from aircraft flying over the park is insignificant compared to the pollution caused by automobiles driving on park roads; however, it remains a true statement that implementing the preferred alternative (prohibiting scenic air tours) would have a positive effect on the park's air quality.

The noise associated with increased automobile use in the park is of a different quality and far more localized than that caused by helicopters flying over the park, which is perceived as being louder. In addition, because helicopters fly above ridgelines, the noise they emit is heard over much more of the park than automobile noise.

COMMENTS

RESPONSES

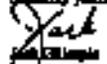
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steward while at the same time the issuance of documents of such nature as fall within your respective fields of both action and sit ye/omies.

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In closing we believe that all concerned should follow a national policy with respect to aviation issues. That policy should include comprehensive that you approved changes to land access as well as oversight by explicitly reserved and take into account aviation interests as well as aviation safety. The Federal Aviation Administration should remain the sole authority regarding aviation and airspace. This should replace the current patchwork of laws, rules, policies that have aviation interests across a public land.

We appreciate the opportunity to comment on this issue and expect you will consider it in your final plan. If we can be of any further assistance please feel free to contact us.

Sincerely yours,  
  
John C. Temple  
President National Parks Association

- 4. Please see the responses to the comments of the United States Air Tour Association.

COMMENTS

RESPONSES

0285

Dear Superintendent,  
 Please refrain from building  
 a new 60-ft Sun Road one-  
 way road which will require no  
 widening & save the payers money.  
 Oppose motor boating in the park.  
 No new development in Park.  
 Visitor services outside the  
 park boundaries use local  
 services instead of new development.  
 Retain existing buildings & repair them.  
 Remove helicopter flights. Do not change  
 the 1960 Richard Henry Dana Practice. Do not change to backcountry zone.  
 Michael H. Hagan, Secretary, Montana River Action Network  
 1000 N. Dearborn, MT 59701



Montana River Action Network—0285

Thank you for your comments.

0019



MONTANA WILDERNESS ASSOCIATION

November 03, 1998

Glacier National Park  
Dave Williams, Superintendent  
SMP/SES Project  
West Glacier, MT 59936

Dear Superintendent Williams:

The Montana Wilderness Association appreciates the time and effort the National Park Service has applied toward updating Glacier's General Management Plan. MWA has been interviewed and involved in this process from the beginning, and only because Glacier is one of the world's great wilderness parks, but because it is part of a larger wilderness ecosystem. The Bob Marshall Wilderness Corridor neighbors Glacier, and the Great Bear is just a stone's throw away. Glacier National Park and Canada's Watkins Lake National Park form Watkins-Glacier International Peace Park, the last of its kind. Watkins-Glacier International Peace Park has been designated by the United Nations as both a world heritage site and a Biosphere Reserve. Glacier's General Management Plan, therefore, is significant to a much larger area than just the nation's parks located inside the Park.

Please accept the following comments from the Montana Wilderness Association regarding the DCEB for Glacier's General Management Plan update.

I. Guiding Principles:

A. Proposed Wilderness

Starting with the recommendation to Congress in 1874 and amendments made in 1904 and 1908, over 90 percent of Glacier Park has been recommended for wilderness designation. This underscores Glacier's long-standing as one of the world's great wilderness parks. The Montana Wilderness Association supports the most recent wilderness proposal for Glacier, as well as the Park Service policy of managing proposed wilderness as such. As the DCEB states to best proposed wilderness areas "shall be administered for use of the American people in such manner as will leave them unimpaired for future use and enjoyment as wilderness areas, so as to provide for the preservation of their wilderness character." Proposed wilderness should be acted upon promptly, so that an accurate corridor to wilderness management would be allowed. For example, the admission shore of St. Mary Lake is proposed wilderness, yet the Going-to-the-Sun Road corridor map shows it as being in a visitor use zone. This needs to be corrected in the FMP. Geographic areas with large amounts of proposed wilderness, such as the Going-to-the-Sun Road corridor,

Reply to Wildlife 1998

Montana Wilderness Association, P.O. Box 1012  
21 Woodland Park Circle, Helena, Montana 59601  
409-724-6996 www.mtwildlife.org

Montana Wilderness Association (11/30/98, Heim, Kalispell)—0019

- 1. This *General Management Plan and Environmental Impact Statement* divides the park's proposed wilderness into two management zones, day use and backcountry. The day use zone also includes areas outside of the proposed wilderness. Only activities consistent with The Wilderness Act of 1964 would be allowed in zones (backcountry, day use, etc.) that are within the proposed wilderness. More detailed direction for the management of Glacier's proposed wilderness is included in the park's "Backcountry Management Plan."

None of the areas designated as either rustic zone or visitor use zone are intended to be within the boundaries of the park's proposed wilderness. The Going-to-the-Sun Road corridor map in the document has been revised to indicate that the southern shore of St. Mary Lake is in the backcountry zone. This map has also been revised to clarify that the visitor service zone does not include the northwestern shore of Lake McDonald between the ends of the existing paved area at the Fish Creek Campground and Kelly Camp.

In the future, it is likely that the park's proposed wilderness will be subdivided into additional zones (also called opportunity class or desired condition areas). Wilderness management agencies like the National Park Service frequently establish different wilderness management zones. This provides a spectrum of settings ranging from very little human evidence to more human evidence (within the bounds of the Wilderness Act).

Most of the Going to the Sun Corridor geographic area is included in the backcountry zone, and nearly all of this zone is in the proposed wilderness.

COMMENTS

RESPONSES

should have management philosophies that reflect the "manage-as-wilderness" policy.

B. "Protect and protect natural and cultural resources..."  
NPSA supports the guiding principles that require the Park Service to "preserve and protect natural and cultural resources unimpaired for future generations" and to "provide opportunities to experience, understand, appreciate, and enjoy Glacier National Park consistent with the preservation of wilderness in a state of nature." We respectfully submit that accepting these principles requires making choices in favor of the preservation of nature.

II. Quality of Supporting Data:

A. Visitation projections.

The NPS believes that Glacier National Park's annual visitation will reach approximately 3,000,000 persons in the year 2020. This projection is the result of a mathematical analysis, conducted by the Denver Service Center, of annual visitation for the most recent 30 years of data that were available at the time of the analysis. The DENR does not disclose the uncertainties inherent in this projection. This should be corrected in the FEIS. In particular, the DENR should disclose the methodology, the upper and lower bounds of the projection, whether the rate of visitation increase is growing significantly faster than the rate of growth of the U.S.'s general population, and the extent to which the implementation of the plan will be affected by changes in annual visitation. We note that this projection appears to be based on a logistic curve using projected data, and caution that this method may not be appropriate to this situation. We recommend plotting annual visitation as a percentage of the U.S.'s resident population, and considering whether the best predictor of visitation for the year 2020 might be a simple function of the U.S. Census Bureau's standard projections. Finally, we caution that given the year-to-year variation in annual visitation from the mid-1970s to the present, any projection may have such widely differing high and low bounds as to be of little use for planning.

B. Maps

(1) The DENR does not disclose the type nor scale of the base map for the plan. The geographic unit maps displayed in the DENR have a scale of approximately 1:500,000, while the Wilderness map (p. 108) is approximately 1:800,000 (these scales are not displayed on the maps as "fractional scales" as obtained from both the maps). These maps clearly are in register; for example, the Wilderness recommendation map depicts the Wilderness boundary as reaching the southern slope of Mt. Mary Lake, while the Going-to-the-Sun Road corridor map depicts a visitor services zone along the lake's southern shore. In addition, several maps sport the "red to yellow" symbology, although there does not appear to be any reason why a scale cannot be displayed. These deficiencies and inconsistencies should be corrected in the FEIS. We recommend that the scale for the plan's base map be 1:24,000, and that the base map be registered to the U.S.G.S.'s 1:24,000 digital elevation model. We further recommend that the plan's

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- The visitor use projections in the diagram at the end of appendix B are reasonable because they take into account local and national economic downturns and upturns over the past 20 years. Although actual visitation numbers for Glacier National Park have fluctuated, the trend has shown an overall increase.
- The maps printed in the draft document are conceptual. The exact boundaries for management zones and for the park's wilderness proposal will be determined and drawn in the revised "Backcountry Management Plan," the comprehensive use plan for the Going-to-the-Sun Road, and the Commercial Services Plan. All planning maps will be on the park's geographic information system. Thank you for the maps you sent us. We will consider this information when we further delineate zones in these subsequent planning efforts. If the proposed wilderness is formally designated wilderness, precise maps will be prepared at that time.



-Page 3 of comments from NPSA on the GMP CDL-

3

base map is part of the Park's GIS system and registered with all of the overlays in the GIS system's database (we understand that the vegetation and hydrology data for Montana's GMP analysis are plotted at a scale of 1:24,000). The maps in the CDL should be referenced to the plan's large scale base map and be registerable with the large scale base map through mathematical integration. The scale of all maps should be displayed as a numerical ratio.  
(4) The paper maps appended in our comments are 1:24,000 U.S.G.S. topographic maps, produced by mathematically scaling the U.S.G.S.'s 1:24,000 digital raster graphics. We have included an ISO 9660 formatted CD-ROM that contains the digital version of our maps.

4

C. Geographic zones and zones  
(1) Natural resource management planning for a unit of land - in this case, Glacier National Park - must be map based. The GMP for Glacier divides the Park into several geographic units, each with a particular management emphasis or philosophy. In fact, these geographic units are broken down into four zones - backcountry, day use, rustic, and visitor services. The better delineation of these zones identify the limits of activities, structures, and degree of development that will be needed and allowed in these zones. The zones, however, are not scientific, but are physical features that must be delineated on the plan's large scale base map with precision. Once the plan is approved, changes to the zones will require amendments to the plan.  
We note that during the implementation phase of the plan, projects such as the proposed Discovery Center near West Glacier will require more detailed NEPA analysis, part of which will entail preparing extremely detailed maps at a scale larger than 1:24,000. This scale maps will be prepared since not achieve the NPS's of his obligation to display the GMP on a large scale base map.  
(2) By law, the NPS is required to manage the lands recommended for wilderness so that the wilderness characteristics of these lands are not degraded. This is noted in the CDL on page 90. The visitor services and rustic zones are not compatible with wilderness management, and all conflicts with these zones and the areas recommended for wilderness should be resolved in favor of the wilderness recommendations. Conflicts between day use zones and the wilderness recommendations about the day use zoning except along boarding cable and traveling structures other than rudimentary sanitary facilities and primitive bridges should be resolved in favor of the wilderness recommendations and the zones changed to backcountry. The backcountry zone appears to be compatible with wilderness designation.

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H. Downstream Air Tours

Exhibit F will show that  
Montana Wilderness Association, 440 West 7th Street  
411 South of First Street, Helena, Montana 59701  
406-755-2264 www.mtwild.org

- 4. The maps printed in the draft document are intended to be conceptual maps. Also please see response 3, above.
- 5. Please see response 1, above

COMMENTS

RESPONSES

MMA supports the GMP's preferred alternative with regard to commercial air tours. In adopting Alternative A, the NPS would recommend to the FAA that all commercial sightseeing flights be prohibited over Glacier National Park. Only in that way can a state of nature be preserved in the Park. Alternative A involves a two pronged implementation: 1) banning any new commercial scenic air tour operators who would operate over Glacier National Park, and 2) developing a scenic air tour management plan with the FAA and the public that would include a phase out of commercial operators existing as of 1997. In giving our support to Alternative A, we do so with the understanding that these two prongs would not be considered as separate options, but as concurrent processes to be carried out as expeditiously as possible. We support the NPS in its efforts to work with and guide the FAA with regard to commercial scenic air flights over national parks.

We also emphasize that while we applaud the decision to ban and phase out commercial scenic flights whether fixed wing or helicopter, helicopter flights clearly would remain in place and return in the Park from fixed wing operations. Related to this, we are not in agreement with the first sentence on page 62 of the GMP which states, "Research has not proven that wildlife populations would be directly or indirectly affected." Research cited in the GMP, such as the mountain goat study by Stephen Cole (page 176), clearly shows that wildlife would benefit from the implementation of Alternative A. As MMA member Wiley McClelland said during public hearings on the GMP: "A strong case, based on published research, can be made to ban scenic tours in helicopters. Helicopters hover, fly as slowly as the pilot desires, can land nearly anywhere, produce blade slip which actually is a continuous set of sonic booms, produce the type of noise that is highly disturbing to humans. Helicopters fly at a high rate of speed that of fixed wings and .8 more than jets, cause significant noise to markedly change behavior, including even parading them to a degree that caribou are permanently displaced."

Therefore, even though MMA appreciates the opportunity to, and does, agree with the NPS that all commercial scenic flights should be banned, we also recognize that helicopters cause the most distress and disturbance to people and animals in Glacier National Park.

We also agree that Going-to-the-Sun Road provides sufficient access for those visitors who want to visit in the Park.

We are gratified that the public response has been so strongly supportive of Alternative A. Hopefully, that will strengthen our mutual position that commercial scenic overflights violate everything that Glacier National Park needs and represents.

**VI. Personal Watercraft:**

MMA fully supports Alternative A, which would codify and make permanent the ban on

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- Please see the revised "Scenic Air Tour" issue and the preferred alternative for that issue, in which we have addressed your concerns. Also please see our responses to the comments of the U.S. Air Tour Association.

**MONTANA WILDERNESS ASSOCIATION**

**-Page 4 of 878 comments on alternatives-**

motorized personal vehicles in Glacier National Park. Like the ban on commercial snow coverdights, such prohibition is essential to "the preservation of the Park in its

state of nature." Let PMAC users go to any of several places outside the Park. Their presence in the Park reduces its "recreational and cultural uses" for tourists and all others.

**V. Winter Use:**

The proposed alternative to offer additional winter services brings to mind the adage, "If it ain't broke, don't fix it." In our experience, it is rarely (if ever) difficult to find a parking place in the Park in the winter, even on weekdays. And there is certainly no shortage of places in the Flathead Valley where one can rent sleds or buy candy canes.

Even the DES states that, "Winter visitor numbers are not high..." Yet the NPS has selected a preferred alternative (A) that calls for additional services based on an assumption that winter visitation will increase. Whence the claim to support this assumption? It seems much more logical to implement the status quo alternative (C.) If winter visitation does indeed increase substantially in the future, Alternative C remains to be flexible enough to allow additional winter services.

We were against limiting additional winter use, which is what both Alternatives A and B do, without knowing what impacts these services would have on non-hibernating wildlife. If found to be harmful to wildlife, it may be difficult for the Park to restrict these services from a public that has grown accustomed to them. Lastly, we urge the NPS not to compete with local businesses by offering services that are already provided outside the Park.

We support the continued ban on commercial use in the Park and encourage strict enforcement of this policy.

**VI. Divide Creek**

Although we appreciate the need to protect the Divide Creek Sanctuary and the Park Service buildings located there, we are concerned about the possibility of relocating these buildings to another area that is just as sensitive to other natural values, such as wildlife. Without knowing where the NPS will relocate these facilities, we can not

Keep it all after 1979

Montana Wilderness Association, National Wild Geese  
47 Woodland Park Drive, #6, Helena, Montana 59701  
409-539-2222, www.mtwild.org

7

- 7. Please see the revised description of alternative A in the "Winter Use" section, volume 1. It is important to understand that this plan lists actions that might be taken over the next two decades to respond to increasing numbers of winter visitors. Providing plowed parking areas and restroom facilities would be in keeping with our goal of not changing the existing patterns of winter use. We do not believe that the availability of such facilities invites more winter use. Winter recreation opportunities in Glacier are becoming more popular as a result of increased population in Northwestern Montana. Winter use of the park would be monitored, and actions would be taken to mitigate or eliminate unacceptable impacts.

## COMMENTS

## RESPONSES

Support the preferred alternative, (A.)

#### VII. Westside Visitor Center:

We are aware that over the years stakeholders have had differing opinions about where to locate the westside visitor center. Some have suggested building the center inside the Park and others have suggested building it outside the Park. While we certainly understand the need for a new visitor center, we are again concerned about the negative impacts such a facility would have on wildlife and other natural values if built inside the Park. We prefer locating a new center in West Glacier rather than inside the Park. If there remains open to obtain the Alberta Visitor Center in West Glacier, we support NPS acquisition of this building for the purpose of renovating it as Glacier's new westside visitor center.

#### IX. Making-Up-the-Gun Road Reconstruction:

As the Park Service determines how to reconstruct the Gun Road with the least impact to tourists and local businesses, we remind the NPS that all plans must adhere to the Park's guiding principle 1.) to manage proposed wilderness as such, 2.) to "preserve and protect natural and cultural resources undisturbed for future generations," and 3.) to "provide opportunities to experience, understand, appreciate, and enjoy Glacier National Park consistent with the preservation of resources in a state of nature." In other words, no mitigation activities, such as new road construction, should be planned to alternate the hardship to visitors and businesses.

We understand the need to make the road safer for vehicular traffic, and we support development of a reconstruction alternative that will respect the fragile wilderness of the Park. Extreme caution should be taken to ensure that water, vegetation, and wildlife are protected during the reconstruction.

#### X. Historic Hotel Maintenance:

NPSA strongly opposes the use of private money to finance the rehabilitation of the historic hotels in the Park. Private money equals private influence, and private influence is inappropriate inside a national park. While cooperative, all rehabilitation work should be financed by the American people.

Plans to rehabilitate these buildings should not involve expansion of existing facilities. No new buildings should be constructed, nor should any buildings be enlarged. Some rooms should be enlarged to accommodate wheelchair, however, buildings should not be enlarged. Preservation of some rooms to accommodate wheelchair will simply have to result in the hotels having fewer rooms.

8. The Alberta Visitor Center in West Glacier is functioning well for the Alberta Tourism Partnership. It has the second highest visitation of the partnership's eight facilities. It is not anticipated that the building will be surplus in the future. No "door" or "window of opportunity" exists to acquire or lease the building.



-Page 7 of comments from MWA on the GMP OIR-

**IX. Congestion on Logan Pass:**

The Park Service should not plan to build additional parking along Going-to-the-Sun Road.

Realism in attempts to reduce congestion on Logan Pass when 1.) the problem is not severe, 2.) visitor projections are uncertain (see section entitled "Quality of Supporting Data, A.), and 3.) other options exist for reducing congestion.

A survey conducted by the University of Montana on peak season days revealed that the pattern of visitors using the east side of the Park should not limit parking space at Logan Pass. In other words, the out of 100 cars aren't able to find a parking space. This represents a visitor/park relations problem, not a severe congestion problem warranting new parking along the Sun Road corridor.

If the Park Service wants to reduce congestion on Logan Pass, a desirable approach would be to eliminate the book store from the Logan Pass Visitor Center. Egressing through the books in the visitor center undoubtedly detains most visitors for at least five minutes. The amount of money the Park Service makes off of book sales at Logan Pass in an average year doesn't come close to paying for the construction of additional and day-use areas. Revenues from the book sales should not be used as an excuse to retain the book store.

For no reason should the parking lot at Logan Pass, or anywhere else, be expanded.

Please contact us if you have any questions about our comments.

Sincerely,

Bob Hein  
Montana Wilderness Association Council Member  
Richard Chapter President

Attachment: Map of MWA's recommended picnic, day use, visitor use, and industry zones along the Going-to-the-Sun Road corridor, with MPB's current wilderness recommendations.

Reply to this e-mail

Montana Wilderness Association, National Field Office  
41 Westwood Park Drive, #100, Helena, Montana 59601  
406-443-4444 www.mtwildlife.org

- 9. The percentage of cars that could not find parking does not include visitors who had to wait or circle the lot before they finally located parking. Eliminating book sales from the Logan Pass Visitor Center will be considered during the pending comprehensive use study for the Going-to-the-Sun Road and if funding is acquired to design and construct a west side discovery center and museum.

9

## COMMENTS

## RESPONSES

8           MR. DECKER: Q4. I have no intention of  
9 reaching it.

10           I would like to -- My name is Bob Decker. I live at  
11 728 South Highway in Helena, and I work for the Montana  
12 Wilderness Association as Executive Director. I would  
13 like to refer first to the purpose of Glacier National  
14 Park, as described in your -- in your General Management  
15 Plan overview, the first couple items in particular.

16           One is "preserve and protect natural and cultural  
17 resources unimpaired for future generations." And the  
18 second one is "provide opportunities to experience,  
19 understand, appreciate, and enjoy Glacier National Park  
20 consistent with the preservation of resources 'in a state  
21 of nature.'" The other one, the third purpose listed has  
22 to do with international relations and peace objectives.

23           In, in light of those first two objectives, I would  
24 urge the Park Service to consider the importance of  
25 prohibiting unnecessary motorization of the park. And by

Montana Wilderness Association (hearing, Decker)—0600

COMMENTS

RESPONSES

1

1 motorization, I mean, in the first place, snowmobiles. I  
 2 think it was very far-sighted of the Park to prohibit  
 3 snowmobiling when they did that, perhaps in the mid '70s.  
 4 and I urge you to include in your final document or final  
 5 plan a statement or reinforcement of that notion and  
 6 perhaps a reinforcement -- of a reinforced explanation of  
 7 why that prohibition is in place and will be continued.

8 Secondly, the idea of jet ski and personal water  
 9 craft in the park is obviously a bad one. It's been  
 10 recognized in the draft plan. And for that, I thank you  
 11 and commend your recommendation there.

12 Thirdly, the issue of overflights is now the most  
 13 compelling motorization issue for Glacier Park. Once  
 14 again, I commend you for adopting a recommendation to  
 15 prohibit commercialized overflights. But I want to urge  
 16 the Park to not just -- on this issue, not just make a  
 17 recommendation and put it on paper and insert it in a  
 18 plan, but to aggressively seek implementation of that  
 19 recommendation.

20 It's going to take a lot of work, what with mixed  
 21 authorities and different federal jurisdictions involved,  
 22 but this is one of the most compelling issues in Glacier  
 23 Park these days, and more and more people are aware of the  
 24 problem, complaining about the problem, and that needs to  
 25 be dealt with sooner than later. So I urge you to act on

7

1. Please see the section on "Winter Use" and the paragraph headed "Snowmobile Use in the Park" (page 92 in the draft document; unchanged in the final plan).

## COMMENTS

## RESPONSES

1 the recommendation, execute it, and in fact succeed in  
 2 getting rid of overlighting in the park.  
 3 The idea of protecting the park's resources then  
 4 leads to my other concern, which has to do with wilderness  
 5 classification and the idea of zones that you've developed  
 6 in the General Management Plan. As I understand it, the  
 7 wilderness recommendation, the long-standing wilderness  
 8 recommendation by the Park Service -- which is a good one,  
 9 by the way -- will hold, is intended to hold through  
 10 implementation of the plan.

11 I think it should be more clearly stated and  
 12 explained in your final plan so that there's absolutely no  
 13 question about the existence of that recommendation, its  
 14 continuation, and its place in the hierarchy of, of  
 15 different management objectives or policies. And given  
 16 those two guiding principles that I mentioned, it seems to  
 17 me that the idea of protecting the wilderness attributes  
 18 of Glacier is at the top of that hierarchy. So I think  
 19 the final plan could -- or the plan could be improved by  
 20 making that a more explicit and making it a stronger  
 21 statement.

22 Then that raises the question of -- And because the  
 23 wilderness, the idea of the wilderness recommendation is  
 24 not treated at length, at least in the overview, I'm  
 25 confused by its relationship to these zones. And so in

2. Please see "Guiding Principles for Glacier National Park" and the chapter headed "General Philosophy for Managing Glacier." Also please see the responses to the letter from Bob Heim of the Montana Wilderness Association and the responses to comments from The Wilderness Society. In addition, please see the general response regarding wilderness.

COMMENTS

RESPONSES

2

2/2/81

1 this first place. I'd like to say that I hope -- I urge the  
2 Park not to allow the idea of these so-called administrative  
3 so-called to supersede the intent and strength of the  
4 wilderness recommendation. And in the second place, I  
5 guess I would question you folks as to whether it does  
6 that or whether we run the risk of having conflict between  
7 these suggested so-called and the wilderness recommendation.

8 So with that, I will close and thank you for your  
9 attention. Once again, I refer again to the principles of  
10 the -- or the mission of the Park and urge the Park to  
11 observe and respect those principles by doing all it can  
12 to protect the wilderness and natural resource values of  
13 the great institution that we have here.  
14 Thank you.

COMMENTS

RESPONSES

1143



MONTANA WILDERNESS ASSOCIATION



Nov. 30, 1998  
Superintendent Dawn Mills  
Glacier National Park  
West Glacier, MT 59906

Dear Superintendent Mills:

I wish to go on record in support of the Draft proposal to incorporate into the Glacier National Park general management plan, a policy requesting that the FFA prohibit all commercial overflights.

As you acknowledge, there is no corridor area where such flights would not impact National Park Service recommended wilderness and the natural characteristics of Glacier-Watkins International Peace Park.

I also wish to express my strong support for certain areas of recommended wilderness in Glacier National Park, without amendments or reductions.

1 Enclosed are letters and correspondence dating back to 1983 regarding the inappropriateness of commercial overflights with the aesthetic purposes and natural imagery of Glacier National Park. Please enter these materials into the public comment record.

In addition, please continue the current prohibition on motorcycles and jet skis.

For the wild,

John Gatchell

Conservation Director  
Montana Wilderness Association

Stamping 10 will show 1 1998

Montana Wilderness Association  
193 Ave. 6th, Helena, MT 59601  
406-443-7338 www.mtwild.org

Montana Wilderness Association (11/30/98, Gatchell, Helena)—1143

- 1. These letters have been entered into the public record as required. Thank you for your comments.



## COMMENTS

## RESPONSES

14

1 development.

2           The other thing that's important for  
3 preserving areas as well as wilderness is that we  
4 manage less the resource and manage more the  
5 people. And I think that that's what the  
6 direction should be for the Park Service, is to  
7 manage people. You don't want to manage people by  
8 putting up more facilities within the park. We  
9 should, as Garry indicated, use some imagination  
10 to develop resources and develop services outside  
11 the park. That way, you don't manage the  
12 resources to death, you manage people who are much  
13 more manageable than wild elk.

14           So I would encourage the National Park  
15 Service to pay attention to what its mandate has  
16 been in the past, look to the future as people  
17 talk about this jewel, this gem of the Northern  
18 Rockies. You don't want to carve up the gem, you  
19 want to polish it and protect it. Thank you.

1138



ROBERT MONTGOMERY HERRINGHAM, DIRECTOR

Ms. R. FRENCH  
Regional Director

November 14, 1983

Superintendent  
Chimney Rock  
Glenair National Park  
Waco, Texas, Museum 50254

Dear Park Manager:

Thank you for the opportunity to provide comments on the Draft General Management Plan/Environmental Impact Statement for Chimney Rock National Park (GNMP). Your comments reflect the views of the 400,000 members of the National Parks and Conservation Association (NPCA). NPCA was founded in 1919 as a citizens organization working "to protect and enhance America's National Park System for present and future generations." It is in this spirit that we offer the following comments.

Specific future planning processes that will be generated from the adoption of this GNMP should be clearly identified. As the National Park Service makes the transition to a new format of GNMP that requires less flexibility in terms of resources for a longer period of time, it must better communicate to the public the planning processes that will be required during the life of this GNMP to make an every-out re-evaluation overlaid to the GNMP. For example, in order for the public to understand the decisions affecting land-use and how they will be made in a land-use management plan, the GNMP must clearly state this intent.

Therefore, we would like to see the final GNMP contain a list of proposed or anticipated planning efforts that will involve the public for the life of the GNMP including efforts for the discovery center, lodging, interpretation, road work, etc. With this list we can not be complete, such an overview will help us all better understand what planning efforts will follow-up on the GNMP and resources on that identified public input will be sought for projects identified in the GNMP and that those projects will be explained every 20-30 years.



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National Parks and Conservation Association—1138

- 1. Please see the description of what a general management plan is and is not in a box in the "Introduction" of volume 1. Also please see "Implementation Plan" near the end of the "Alternatives" chapter.

1

COMMENTS

RESPONSES

2

The GMP should identify the importance of working in partnership with others in protecting park resources and providing visitor services. The plan does not specify in what areas, and how, the park could work with other groups, organizations, and individuals to protect areas to advance the mission of the park. It does speak to general coordination, exclusively with governmental entities in the chapter entitled "Regional Cooperation" (p. 23-27). While it may be difficult to anticipate all those potential partnerships for specific purposes, the GMP should at least emphasize the benefits of partnerships, plan to investigate and evaluate those relationships, and provide a few examples of where partnerships can be developed beyond simply coordinating activities with other agencies. Potential partnerships include development of: visit site visitor center, research projects, educational projects, facility development outside the park, interpretation, and resource protection.

Also, state the same paragraph discussion of Glacier's cooperative relationship with Watkins Lake National Park (p. 74). It is difficult to ascertain how this relationship is different than that with other agencies adjacent to the park. Yet the value of Watkins-Glacier is to be "one park" (p. 87). The GMP should briefly discuss in what ways this cooperation is different than with agencies having a different relation to the National Park Service, and to attempt to strengthen this relationship and potential ways in which NPS might further advance this vision.

The GMP should detail the connections among park programs/projects and park resource districts. Overall, the plan does not clearly connect various agencies in the ecosystem and among various portions, but within the park's various departments and between districts as well. We would be interested to know, for example, how interpretation efforts can further the work of backcountry managers, scientists, educators, etc. and vice versa.

Glacier's "Statement of Significance" should clearly identify the opportunity for finding solitude and quiet across the park and identify its significance as a Biosphere Reserve and World Heritage Site. Certainly the significance of Glacier National Park is well-documented and it is difficult to succinctly summarize the importance of a resource that is as great as this park. However, due to the national laws, policies and associated responsibilities that apply across the park, we believe a few words about the significance of the park as a mosaic of solitude and tranquility is a critically important statement to make.

In addition, while it is briefly referred to (p. 13-15), we believe the statement of significance of a World Heritage Park should speak more specifically to the international significance of the park. Along these lines, the park should better explain how its role as a Biosphere Reserve will be advanced during the lifetime of this plan (p. 15).

The "Central Issues" listed in the plan ALL deal with visitor use and importance in the context of natural resource understanding and preservation. Page 62 of the plan has the eight central issues that drive the plan. We do not dispute the importance of addressing these issues, however, we believe the plan overstates the central level of addressing science in Glacier that will result in enhanced opportunity of the resources.

2. Detailed descriptions of the park's partnering efforts would be too lengthy for inclusion in this document. Some examples of partnering efforts with Waterton Lakes National Park are sharing interpretive staff, joint training exercises, cooperative efforts in monitoring such transborder species as grizzly bears and bull trout, and cooperative research efforts. In addition, the section "Regional Cooperation" in the alternatives chapter highlights some of the cooperators with Glacier National Park.
3. The information you requested is beyond the scope of this plan; providing such information is not the purpose of this type of plan.
4. The importance of the park's designations as a world heritage site and a biosphere reserve are briefly described in the "Guiding Principles" section (page 13 of the draft document). The importance of solitude and tranquility is discussed in the "Guiding Principles" section of this document. It is also discussed in the "Environmental Consequences" chapter in relation to the damage that scenic air tours do to this important park value. These values are also inherent in the management responsibilities of the National Park Service for its proposed wilderness, as (pages 13, 14 and 62 of the draft document). Also please see the responses to the comments of the Montana Wilderness Association and the Wilderness Society, as well as the summary of public comments on wilderness, and our responses. The biosphere reserve concept has been implemented at Glacier as follows:
  - encouraging use of the park for research, including genetic preservation, detection of ecosystem change, and applications for areas surrounding the park
  - preserving the protected area's integrity through proactive park management, cooperative monitoring efforts, partnering with park neighbors to resolve mutual issues, and sharing data and research results with others, especially other biosphere reserve managers
  - fostering education through interpretive programs; providing assistance to environmental education institutions; and assisting students from the United States and other countries.

The implementation of the biosphere reserve concept is further enhanced by

2

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5

COMMENTS

RESPONSES

5

There have been at least 13 books, reports and papers written since 1988 addressing how the NPS can best protect the natural resources of the national parks, including the *Nat. Agency* and *West Wildlife*, *National Wildlife* book, *Preserving Nature in the National Parks*. One of the excellent books throughout all of these publications has been the need for more and better park science. According to most of these reports, the problems facing the NPS result largely from a lack of scientific information. Without this understanding a park cannot make decisions that ensure resource protection. "Science" generally is meant to include the knowledge contained in biological inventories, research conducted on natural histories of specific species, the interpretation of scientific data, and the determination of the effects of park policies on living systems.

We do not mean to imply that the report for "more science" can "save the park." This is because the national parks cannot be saved through policies — and values and policies are fundamentally interconnected phenomena (although some values can be isolated). We write science because better values and policies, science should provide fundamental baseline data for management decisions. Preserving park resources often calls for making difficult decisions that are supported with scientific data. These decisions can only be implemented on the basis of scientific evidence and demonstrated need. Without science to back up management decisions, the effectiveness of the NPS in protecting natural resources will remain far below its potential.

Therefore, we strongly urge you to include a science component in your action items. The action recommended may include developing a wildlife science program of related activities, a new building for housing activities including a classroom and laboratory the visiting, education and graduate students, an ecological inventory and monitoring program, partnerships for non-federal research, or some funding for science programs in the park. But without this direction, the plan appears to be placing other values for shared resource understanding and protection.

6

Moreover, another "Critical Issue" may be warranted. It is dangerous, but relatively easy, to think of critical issues as those which need addressing immediately. Certainly developing inventories and improving funds to the parks rank as urgent concerns and could be listed in this category. However, just a critical to the long-term health of the park is education and interpretation. Just because it is not a pressing need today doesn't mean that it is not a critical or action item. We believe it is. The plan should consider addressing this topic as a central issue with appropriate objectives of long action are necessary to promote an understanding of the park particularly among local people. Partnerships, public-private science policy, educational facilities, outreach, outreach, outreach and so forth should all be considered in this light in order to create an essential literacy that better appreciation of the values Glacier offers to present. Like natural resource understanding mentioned in the previous section, interpretation is a key component of the national park experience, and should be an issue in this document.

7

It is unclear how the interpretive area relates to the proposed wilderness area. As the document points out on page 100, a wilderness recommendation was sent to Congress in 1994. It is unclear whether the proposed "wilderness area" encompasses the same area that was recommended as wilderness. If these two areas have significant overlaps,

the park's many cooperative efforts with two other nearby biosphere reserves; the Coram Experimental Forest in Montana and Waterton Lakes National Park in Alberta, Canada.

5. The importance of science to resource management and decision making is briefly discussed in the "Guiding Principles" section and the "Critical Issues" section. In drafting the *General Management Plan*, we decided that discussion of the importance of science at Glacier more appropriately belonged under the listing of guiding principles than as one of the critical issues. The use of good science is inherent in virtually all resource-related decisions made by the park's management. Glacier National Park has a rich history of scientific studies. The first scientific endeavors began in the 1920s, and research covering a wide range of social, biological, and physical sciences has continued into the present. More than 70 graduate theses have been written on research studies in the park. Glacier has had a resident science staff since 1967; first as part of the National Park Service and more recently as a part of the Biological Resources Division of the U.S. Geological Survey. A sampling of recent research conducted in the park includes the ecology of large mammalian predators and their prey, fire ecology, global climate change, and the ecology of whitebark pine.
6. We concur with the emphasis you placed on the importance of education to the management of a park such as Glacier. However, we decided that discussion of this issue more appropriately belonged under the listing of guiding principles rather than being listed as one of the critical issues. Educational endeavors are discussed in "Guiding Principles" and under "West Side Discovery Center and Museum." Also please note that under the preferred alternative for preserving historic hotels and visitor services, the Village Inn would be removed and replaced by a new lodging facility away from the lakeshore. The new facility could serve the residential needs of the Glacier Institute near the proposed discovery center and museum.
7. Please see the responses to comments from the Montana Wilderness Association, the Wilderness Society, and the Friends of the West.

COMMENTS

RESPONSES

7	<p style="text-align: right;">4</p> <p>that should be stated in the discussion of zoning on page 21. We would like to see all the 1974 wilderness recommendations made for management in the "backcountry zone" and further that it is desirable to change this label to "backcountry." There would be less confusion if the plan continued to refer to its zones as backcountry, and use that the public understands, by referring to it as a "wilderness zone." If the plan's day use areas or trails zone designation falls within recommended collection, this zoning can be reversed within the backcountry management plan under the Wilderness Opportunity System framework within the wilderness zone.</p>
8	<p>Alternative to address visitor use on Going-to-the-Sun Road and backcountry. Advise that the GTO's Director of Visitor Use on the Going-to-the-Sun Road (GTOV) Road is an analysis of carrying capacity and the degree to which such alternative would alleviate crowding. For example, what effect will Alternative A be expected to have on crowding along the road west of Logan Pass? Will crowding be alleviated, or reduced by several law cases?</p>
9	<p>NPSCA continues to believe that a secondary shuttle system needs to be developed during the peak visitation period and that the GTOV should be offering such alternatives along these days. We are strongly opposed to expanding the parking lot at Logan Pass, as this does nothing to provide the a permanent solution. We do support vehicle length and vehicle restrictions and regulations of whether there should become more stringent. We also believe that all such items should be removed from the visitor center at Logan Pass or providing shopping activities <del>within</del> the parking facilities than by accommodating people to larger in the center for a longer period of time.</p> <p>We support fast-track reconstruction of the GTOV Road. Page 39 recommends the facility to be achieved by working to reconstruct the GTOV Road in 4 to 6 years. We support Alternative A.</p>
10	<p>Reconstruction of some historic facilities is necessary. While the reconstruction of historic visitor facilities may be a worthwhile goal, we question whether this additional task is achievable given budget and funding availability and the need for additional resources of money for other park programs. We would that it realistically, for example, to be spending more than \$100 million on reconstructing structures while essential maintenance efforts in the park go begging.</p> <p>Should funding not be obtained, the GTOV says nothing about what would happen other than the only remaining alternative identified -- no action. Because of the questionable ability of the park to raise these very significant amounts of money for facilities, we strongly encourage the plan to develop a full back position for Alternative A. We believe that in a middle ground that needs to be clearly identified in the final GTOV. Perhaps this alternative would state that significant reconstruction should occur at the most significant historic structures in the park, while others may need to be saved or they along on critical, required maintenance only funding. In other words, such needs to be some sort of priority given to resources and some indication of what happens in the eventuality that funding falls short of reconstruction and perhaps some maintenance costs.</p>

8. The new preferred alternative for "Preservation of the Going-to-the-Sun Road" (A1) in volume 1 of this final document includes the preparation of a comprehensive use plan for the Going-to-the-Sun Road.
9. All the ideas you presented will be considered in a comprehensive use plan for the Going-to-the-Sun Road. Please see the alternative A1 for Visitor Use on the Going-to-the-Sun Road in volume 1 of this final document.
10. The "Preserving Historic Hotels and Services" section has been revised for this final document. Under alternative A, one method of funding the rehabilitation would be to seek federal appropriations. This alternative also includes a plan to explore alternative funding sources should appropriations not be available. Under "Actions to Be Taken," alternative A has been modified to include the development of a plan to prioritize and phase the rehabilitation work on the historic structures.

COMMENTS

RESPONSES

11

**Further, we would like to see mention of providing housing for concession air attendant employees outside the park boundary. This may mean new construction. In places such as Liberty Glacier, we would like to see an analysis of providing housing nearby for non-employee personnel outside the park and providing a shuttle service to transport those workers to their places of employment. Such an arrangement would not have negative effects on those people who live in the park, where buildings and provide visitor access outside in the evenings.**

**NPSA strongly opposes an commercial lighting tower over the park and a ban on personal vehicles throughout the park. National Parks must provide a necessary vehicle our citizens may want and manage the traffic of our destination. Both air mass and personal vehicles disrupt the park because of visitors' ability to see the results of snow, impact a visual intrusion to the park scenery and diminish the visitors' experience. We support Alternative A the both air mass and personal vehicles.**

**We urge a continued effort to provide park recreational opportunities in the winter. Operating a park to become winter use can not in certain limited programs for the better development of winter recreational opportunities which can offer wildlife and the visitor experience. We have seen this happen in Grand Teton and Yellowstone National Parks. Therefore, we oppose any effort to open commercial facilities in the park during the winter including provision of meals and all amenities as well as overnight accommodations.**

**These winter opportunities can be provided for by local communities. Thus, we would like the that GMF to already state that an commercial ventures will operate in the park during the winter and operate the park for snowmobiles.**  
**The GMF should state what the additional annual costs to the park will be for the extra plowing that would take place under Alternative A. This cost is not expected to pay off with other winter travel. Where will the funds come from and what other park programs will be cut back to pay for this expansion? We do not oppose limited plowing of additional roads if the costs do not exceed their resource protection budgets and if it is made clear to the that GMF that these roads may be closed without additional notice if the park's intensive recreational activity is negatively affecting wildlife in one or more of three areas.**

**Structures should be relocated out of the park and that board near of Liberty Glacier. We support Alternative A for the Liberty Glacier food site and would encourage the park to relocate as many of these structures, particularly employee housing, outside of the park whenever possible. If this requires special legislation, NPSA would be more than happy to work with the park to generate congressional support for this project.**

13

**NPSA supports a discovery center and museum to be located outside the park. We support the need for a discovery center with interactive displays and museum storage and display. We believe that it is in the best interests of the visitor to be able to be able to see the history and to provide interpretation and visitor information for the experience, not just Glacier National Park. Thus, a job for NPS, USFS, state parks and BLM, director of resources particularly to develop a joint visitor center museum in an**

- 11. NPS employee housing is discussed in the section "Alternatives, Ideas, and Strategies Considered but Rejected" in volume 1 of this document. Concession housing would be addressed in site-specific plans for each area.
- 12. Please see the responses to comments of the Montana Wilderness Association and the Wilderness Society. Also please see the summary of public comments on winter use, and our responses. The costs of additional snowplowing called for in alternative A would be minimal, as it would involve minor extensions of the areas that are already being plowed. This would become a part of the normal winter plowing schedule that the park maintains, and additional costs would not be significant. Other park programs would not be diminished as a result of the need to provide additional winter plowing. In the "considered but rejected" section under "Snowmobile Use in the Park," see the park's reaffirmation of its ban on snowmobiles.
- 13. In the past the U.S. Forest Service had been interested in developing a common visitor facility outside the park. Within the past decade, few such facilities have been successfully funded by any land managing agency. At present Glacier National Park helps to staff the Alberta Visitor Center about five hours a day during the summer and makes an average of 5,000 visitor contacts annually. A cooperative visitor center outside the park is not a high priority for other agencies. Also please see the additional discussion of this issue under "West Side Discovery Center and Museum" in volume 1 of this final document.

COMMENTS

RESPONSES

13	<p>small white, non-scientific, convenient and false information package than a NPS-only approach.</p>
14	<p>That said, we realize that it is beyond the full control of NPS to make this happen. If other potential partners are unwilling. Then, we would prefer to see a Chief that wants to a serious exploration of potential partners to develop a jobed center as its first priority. If a partnership cannot be developed, we would prefer to see a NPS visitor center to be located outside of the park. Finding the needed legislation the protection of property, and the submission of these other possibilities, does the Agency also should be considered.</p>
15	<p><b>Other items we'd like to see the final OMP address:</b></p> <ul style="list-style-type: none"> <li>▪ Preservation of natural light by controlling lights in the park to reduce glare and night-sky effects as well as working with galaxy communities in an educational effort to encourage stellar-observatory visitors (we'd like to see the right story line listed in the statement of park significance as it truly is an outstanding park resource).</li> <li>▪ A full recycling program completed throughout the park (Chief should be a leader).</li> <li>▪ A commitment in the OMP to aggressively address the spread of invasive weeds and exotic species (discussed on page 10) in backcountry).</li> <li>▪ Commitment in a particular "Plan of Greater National Park" report to identify specific issues, activities, opportunities, partnerships, etc. in the park to human public understanding of park issues.</li> <li>▪ A more in-depth discussion of developing an inventory and monitoring program for the park and its specific commitment to begin a Visitor Experience and Resource Protection (VERP) or Limits of Acceptable Use (LAU) planning process (P. 11). Through this and, park staff should look at lessons developed by Parks Canada that were "reworked locally" of a park. This commitment is required of all parks conducting planning processes as part of a 1996 agreement passed by parliament to Canada's National Parks Act.</li> <li>▪ As briefly mentioned on page 12, we support the effectiveness of border sleeping in order that Transverse-Chlorine National Park more closely address the vision of our park.</li> <li>▪ A statement that public access to the backcountry zone are developed with park values. Such a statement may prove helpful if the park is faced with a request for a telecommunications tower. Under the 1996 Telecommunications Act, Federal land managers are required to "negotiate" with such requests. Such a statement could provide Chief as leverage if it that staff having to decide on a tower request.</li> </ul>

14. The NPS recommendation to place the west side discovery center and museum in the park is based on the premise that if the center is going to successfully "connect visitors to park" and prepare them for an appropriate experience, it would best be done within the boundaries of the park. The National Park Service has a dual mission: protect park resources and provide for visitor enjoyment. A well-designed educational facility strategically located at the T-intersection near Apgar could most effectively convey park messages (orientation, safety, resource protection, and interpretation) while being cost-effective and environmentally sound for the reasons detailed in volume 1 under alternative A under "West Side Discovery Center and Museum."
15. Several of the issues you mentioned are addressed in depth in the park's *Resource Management Plan* and in related plans such as that for integrated pest management. The National Park Service probably would deny a request for radio towers in the park's backcountry zone because that entire zone is in the proposed wilderness.

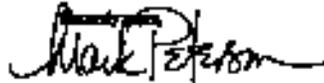
COMMENTS

RESPONSES

7

In writing, we appreciate the time and energy that NPS staff put in to develop this document and involve the public in critical decisions along the way. We also appreciate the time that Tracy Middle and Hank Peterson enthusiastically gave to us in helping us better understand the issues involved in this document.

Thank you for this opportunity to comment and your willingness to consider these comments with an open mind as you prepare the final OMP. We will look forward to working with you on your program in the future.



Hank P. Peterson  
NATIONAL PARKS & CONSERVATION ASSOCIATION

## COMMENTS

## RESPONSES

0771

November 11, 1998

Superintendent David A. Mills  
 CHEYENNE FOREST  
 Glacier National Park  
 West Glacier, Montana 59906

Dear Superintendent Mills:

As President of the North Fork Preservation Association, your subject to the west, I am very concerned about the possibility that are increasingly being built in the Park and in the National Natural Forest. These projects are the most sites of the North Fork River have to do with development and human population density, and on the Park side of the River. These projects have to do with increased use by the public.

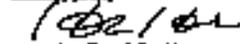
In the light of the pressure on the Park, I hope that you will hold the line against demands to increase the types of use, such as snowmobiles and powered vehicles. As I hope in the past, I would urge you to prohibit skiplifts and snowmobiles over Glacier National Park. As a condition, please consider the fact that the trends pointing toward the commercial country suggest that we all need to be vigilant in protecting the problems: pollution, noise, fire, poor water and air that we all share.

This means that you must resist some of the pressure that are motivated by some voices in our society: demands of power, "mobility" by the public, and freedom of movement. These "rights" are neither absolute nor absolute, and we in the North Fork Preservation Association believe that the time has come for these rights to be qualified by the needs of other non-human visitors and the land itself.

Please support the notion of additional development within the Park by limiting the proposed visitor center outside the park in West Glacier, developing a suitable alternative to increased trails on the Glacier to the Sun Road, and the preservation of most of the Park as a true wilderness area.

Thank you for the opportunity to comment.

Sincerely yours,



Harold L. Howard, President  
 North Fork Preservation Association  
 Pollock, Montana 59028

North Fork Preservation Association (11/11/98)—0771

Thank you for your comments.



COMMENTS

RESPONSES

05/19 21

1 the scenic overflights. how much noise pollution is made,  
 2 how much it bothers people.  
 3           As far as airports, jet noise. they don't belong  
 4 in the park either.

1

5           Glacier needs to find where the high end of the  
 6 use of the park, the limits of acceptable change. When they  
 7 might have to shut the door sometime. Hopefully never, but  
 8 have something in mind. Limits of acceptable change.  
 9           Plus, no more parking lots necessary.

10           Just don't keep adding parking lots as the people  
 11 keep coming. Have the logical thought patterns first.

12           Visitors should be welcomed to Glacier but not  
 13 enticed in by promotion of the park by the park. Likewise,  
 14 winter visitors should be welcomed but not encouraged by new  
 15 facilities.

16           I also represent the North West Conservation  
 17 Association. Thank you.

1. Please see the section on "Implementation Plans."

COMMENTS

RESPONSES



November 15, 2018

DEW  
BUREAU OF LAND MANAGEMENT  
U.S. DEPARTMENT OF THE INTERIOR  
BOSTON, MASSACHUSETTS 02771 USA  
E-mail: [land@blm.gov](mailto:land@blm.gov)

Glacier National Park  
Wilderness Division  
West Glacier, MT 59936

To whom it may concern:

I would like to submit these comments in relation to your wilderness plan.

Please, please, please prohibit commercial air taxis inside Glacier National Park. I've already had out-of-state corporations in the Yellowstone area who approached about the ability to operate from "light landing" zones.

Wilderness plans prohibit commercial wilderness use. I am sure Park Service staff has proposed these two points and I sincerely appreciate that. I am sure as a proponent of preserving and protecting natural park resources, and conducting a national Park Service.

Also, please consider developing a voluntary mass transit system for use inside the park (Going-to-the-Sun Road), and eliminating additional parking or parking lot expansion.

Thanks for this opportunity.

Sincerely,

Ken [Signature]

Northern Rockies Natural History—0849

- The preferred alternative for visitor use on the Going-to-the-Sun Road would include providing an “efficient and convenient” public transportation system. It is acknowledged in the alternative that a federal subsidy might be necessary to accomplish this. The assessment of an expanded transportation system for the Going-to-the-Sun Road would be considered as a part of a comprehensive use plan for the road.

1

COMMENTS

RESPONSES

People For Elk  
Box 11  
Hungry Horse,  
MT 59718-0011



0642

RE: GMP draft EIS comment

Dear Superintendent [Name]

The Park is "home" to many of our Creator's creatures such as elk, grizzly bears, bison, bald eagles, and many others including sensitive old-growth plants, trees, and animals. We humans are visitors who go away to our own homes after witnessing the awesome spiritual wilderness at Glacier Park. This wilderness must be preserved as most important for the future. Comparing populations of animals to the population of humans, common sense shows there is less and less animals while billions of humans on this earth. How can we give a lot for humans? We must respect animals for their lives and needs.

It is known that the park is a sacred place to Native American Indians. There are over 180 vision quest sites in the park according to Brian Friesen. Why aren't park policies being applied that require an Ethnology program to interpret the park (LEDCO NPS park policies, 0-11 E12)? Then, people would get some understanding of the spiritual significance of this sacred place used by Indians for religious purposes for thousands of years since prehistoric times. It seems wrong and strange to hide the Ethno study in the back of the EIS ("Our Mountains are Our Pilgrims", p. 283) and why not use this for an interpretive theme for the park (App. E., p. 288). Caucasian Americans have an interest in the spiritual understanding the real root trail for our earth. Before we can get to heaven, we must touch the earth in a sacred spot, which is Glacier.

We are very concerned because the draft EIS wrongly eliminates wilderness from the zoning. "Wilderness" and its

People For Elk—0642

1. This is one of the stated interpretive themes for Glacier National Park.
2. Please see the responses to comments from Friends of the West, the Montana Wilderness Association, and the Wilderness Society.

1

2

COMMENTS

RESPONSES

2

Legal definitions from the wet have been removed from the new zoning categories that apply to existing 98% study wilderness (see draft EIS pgs. 20-21, 28, 33, 34). We believe this to be the "various changes" that oppose the new zoning philosophies presented (draft EIS pgs. 18 thru 40). If we let this new zoning stand, then in the future, the wilderness will be impacted upon further and further, until no wilderness values remain.

The EIS is required to be accurate and honest. The park's Existing Management Zoning map should be updated and retained in the EIS so people know what the park service is up to. It seems wrong to not inform the public about existing Zoning Conditions and not allow them to comment on the big changes proposed. Do not remove the core of the park for "visitor services". We support the core of the park along Going to the Sun Road should remain as Natural zone and Wilderness. "Going to the Sun" means going to the Creator, or Going to God, and this cannot become development. Where else can we protect these sacred spaces?

3

The EIS admits that the idea of more pullouts, picnic areas, and trails along Sun Road could adversely affect Grizzly Bears with habituation and food availability (p. 200). This seems true. People should generally stay in their cars along the Sun Road without more developments. If people are made to stop then they will need toilets. Is the park going to have portable toilets all along the historic? Toilets are an adverse impact you cannot ignore. The bright blue portapotties at the Loop look awful. Support AL C - just keep it the way it is.

Just keep fixing the historic Sun Road without closing it permanently for years. This is how we did. The local economy (with the local businesses outside the park) depend on the road being open. We support Alternative C - Keep fixing the road (p. 80).

The EIS states that "riparian areas provide important winter range for deer, elk, and moose" (p. 118). Deer increasing means winter use is not right for these areas and should not be encouraged with new developments of snack shops and hotels in riparian areas around Lake McDonald. There are lots of

3. Additional restroom facilities are being developed along the road as a part of the park's fee demonstration program. This issue also will be addressed in the comprehensive use plan for the Going-to-the-Sun Road. See the new preferred alternative for "Visitor Use on the Going-to-the-Sun Road."

COMMENTS

RESPONSES

snack shops and rentals outside the park. We don't need more  
 winter development inside the park to support all winter range.  
 Just  
 Support Alternative C- just keep it the way it is. We also  
 support the park in getting rid of noise machines (jet skis,  
 snowmobiles) and reducing helicopters. There also can be  
 still and know the quiet spirit. Thank you very much for being  
 heard.

*James James Wyllie*

COMMENTS

RESPONSES



0966

2100 N. WYB AVE  
**PURDY RANCHES**  
BUFFALO, NY 14226  
JULY 22, 1998

Re EIS / E M P

Adirondack Park Board  
State Office, NY  
for Review & Info:

We all stand in preservation of more visitors  
annually into our beautiful park systems. As it  
is time to carefully hold firm on the wilderness  
that is managed. Some animal predator species,  
deep uncut forests and clean fresh water all  
are what we must protect with no borders!

There must be no motorized use of lakes  
and grinding of snow machines in the pursuit  
of hunting down game.

Please consider mass transit transportation  
to our entire park - parking lots from being  
built. Give our wildlife a BREAK - this  
includes birds! Thank you  
Cynthia Purdy

Purdy Ranches—00966

Thank you for your comments.

COMMENTS

RESPONSES



0072



Joseph M. Foster  
Director  
Wilderness Society  
1000 17th St NW  
Washington, DC 20036

August 15, 1999

Mr. David A. Milling  
Superintendent  
National Park Service  
Gardner National Park  
West Glacier, MT 59923

Dear Dave:

I just received the General Management Plan Overview. Thank you very much for sending it to me. Your staff did a very good and professional job in preparing the plan. I absolutely enjoyed reading it and compliment you for a job well done. I even think this book could be sold to our guests and other visitors to the park as a way of getting some of your costs back. There was a lot of thought put into the plan and hopefully we are able to accomplish the preferred situations in each scenario. Again, thanks for including me.

Sincerely,  
*Joe Foster*

JM

A Wildland Society  
1000 17th Street, NW, Washington, DC 20036 Phone: 202-331-1000 Fax: 202-331-1001

Restaura—0072

Thank you for your comments.

*Watkins - Glacier International Peace Park*

*D-681*



Approved June 24, 1968

SPONSORED BY ROTARY INTERNATIONAL

2220 R. 2270 A. Road, Walnut, Pennsylvania, and  
P.O. Box 18286, Columbia, D.C. 20518

8710 Mission, United States of America

November 2, 1968

Tom Leach  
General Management Plan  
Glacier National Park  
West Glacier, Montana 59936

Enclosed is a copy of a motion passed by the executive of the Rotary Watkins-Glacier International Peace Park Association, September 26, 1968, at the annual meeting at our headquarters held in West Glacier, Montana. We submit this motion as comment on Glacier's general management plan, specifically the plan proposed to build an "Interpretive-Observatory Center".

If you have any questions or need clarification, please contact the writer.

Yours truly,

Rick Swanson

Rick Swanson - President  
(409) 274-1333

John W. Hill - Vice President  
Montana Wild, Alaska TLA-814

Barry Minsky - Sec. / Treas.  
(408) 367-1228

COMMENTS

RESPONSES

*Waterton - Glacier International Peace Park*



Responsible/June 23, 1988

**SUPPORTED BY ROTARY DISTRICTS:**

3940 & 3950 Atlanta, Watson Communities and  
Districts British Columbia, J.C.E.V., Canada

3228 Memphis, United States of America

The members of this Rotary multi-district committee, meeting September 27<sup>th</sup> 1988  
passed the following motion unanimously:

Moved: Ted Volantini Calgary Alberta

Seconded: Tom Swinhoe British Columbia

Whereas:

Watson Glacier International Peace Park was named a World Heritage Site in  
December 1984, becoming the 12<sup>th</sup> World Heritage Site in Canada, and the 27<sup>th</sup> World  
Heritage Site in the United States.

AND WHEREAS:

many of these 27 Heritage Sites in Canada and the United States have been recognized  
with significant interpretive Centers that present the importance of these sites to the  
world.

BE IT RESOLVED:

that the Rotary Waterton Glacier International Peace Park Association request the  
government of Canada and the government of the United States, individually and jointly, in  
cooperation with international organizations and individuals, appropriate interpretive centers  
in Waterton Park and Glacier Park, that address the significance of the world Heritage  
Site designation to Canada, the United States, and the International Community. These  
centers would be complementary, and work in close cooperation to demonstrate the  
principles of peace between countries, and the preservation of natural heritage to the  
thousands of people from around the world who visit Waterton Glacier Peace  
Park each year.

Neil Switzer - President  
(403) 527-1529

Billy 794 423-4th Street S.E.  
Medicine Hat, Alberta T1A 8L4

Billy Manning - Hon./Pres.  
(403) 527-7228

Rotary International—0881

These are important concepts for Waterton-Glacier International Peace Park, and they will be included in all present and future visitor centers. Both Waterton Lakes and Glacier National Parks very much appreciate the recognition that Rotary International, and specifically the two Rotary Districts, have brought to the two national parks through the years. The Rotary Waterton-Glacier Peace Park Association has been a driving force behind the international peace park since its inception.

1

*Waterton - Glacier International Peace Park*



Supplement No. 1, 1994

**SUPPORTED BY HONORARY DIRECTORS:**

5340 & 5350 Alberta, Waterton International and  
Peace Parks Canada, CANADA

8040 Montana, United States of America

The following copies were sent and passed to the executive committee of the Waterton-Glacier International Peace Park Association, September 30, 1994.

**Preamble**

The Waterton Glacier International Peace Park was declared a World Heritage Site Dec 7 1994. The significance of this Heritage Site is that it is our site in two countries, rather than two separate sites, one in Canada, and one in the United States.

In conjunction with the 50<sup>th</sup> annual meeting of the Waterton-Glacier International Peace Park Association, held in Banff, Alberta, September 19, 1994, a follow-up ceremony for this Heritage Site was held, and a plaque was unveiled to celebrate this occasion.

The association between Waterton and Glacier National parks dates back to 1931 when the Rotary Clubs of Alberta (Rotarion 5340 and 5370) and Montana (Rotarist 5390) petitioned their respective governments to create Waterton-Glacier International Peace Park, the world's first International Peace Park. The governments of Canada and the United States responded in 1932 by formalizing the Rotary request and legislated at the Federal level the creation of this two country peace park.

Since 1932 representatives of the Rotary Clubs of Alberta and Montana, functioning as the Waterton-Glacier International Peace Park Association, have met annually, allowing between Waterton and Banff Glacier, to celebrate the creation of this peace park and, to reaffirm our dedication to peace and goodwill between our two countries, exemplified by the natural beauty of these two parks.

During formal and informal discussions among Rotarians at these meetings we have concluded there is a need to develop complementary interpretive centers in Waterton and Glacier Parks that celebrate peace among nations as they exhibit the natural and cultural significance of the parks. As well as the interpretive function the centers would be used as meeting venues for security and border dispute resolution, conferences and Rotary sponsored peace meetings.

Wat. Assn. - Waterton  
(403) 878-1303

Wat. 5341 5350 4th Street S.E.  
Medicine Hat, Alberta T1A 6L4

Rotary Meeting - Banff, Canada  
(403) 423-7124

COMMENTS

RESPONSES

0665

St. Mary Lodge & Resort

November 2, 1981

GRACIERS Project  
Custer National Park  
West Custer MT 59506

To Whom It May Concern:

In response to the draft General Management Plan and Environmental Impact Statement, I would like to add to the comments that I made during the hearing on October 18<sup>th</sup> in Kalispell:

1

Going-to-the-Sun Road and its Use. Going-to-the-Sun Road, and its use, should be located at very judiciously in how we are preparing for the increase in future visitation numbers. I do not feel that Alternative "A" provides us with a large enough margin to adequately handle the additional pressures we will have on this resource. I suggest a modification between "A" and "B", with the idea that some along Going-to-the-Sun Road can be expanded in order to create the appropriate interpretive access so that everyone is not forced directly to Logan Pass or the Avalanche area. This will concentrate parking of permits resources that will allow the visitor in Custer Park an opportunity to use those facilities without further impacting remaining portions of the park. Logan Pass should be looked at as a focal point, and managing that particular resource with parking restrictions and shuttle service, along with potential suggestions would fully meet future needs.

2

Divide Creek drainage area. In this area, Alternative "A" does not address the situation that presently exists with Divide Creek, and its potential to occasionally cause Going-to-the-Sun Road to future traffic. Any high water presently puts Going-to-the-Sun Road in jeopardy of being closed due to the poor drainage capacity that presently exists. It is important that the Park Service become an integral player in an inter-agency approach to solving the dilemma, with the Blackfoot Tribe, relative to Divide Creek. The park has recently spent a great deal of money on the St. Mary Visitor Center and, that particular building is in jeopardy from high water if something is not done with the Divide Creek bridge and the approach. Locating it inside the park. The eventual carrying of the facilities, riparian forests and a forest. The more resources placed in a big part of this situation, and its future needs has not been addressed by the public. The preferred alternative does not address the present and future situation.

3

Going-to-the-Sun Road Reconstruction. As a follow-up to my comments, I feel that the Park Service needs to select a local approach to this particular issue, and not make it site specific as was done in the draft General Management Plan. \$1,000,000 has been allocated for additional study on reconstruction and assessment report, which should help the Park Service in making a quality decision regarding the reconstruction and upgrading of the resource. Your management plan should include only a statement indicating that you intend to reconstruct Going-to-the-Sun Road under the best and most expedient means, taking into

AMERICAN OVERSEAS DEVELOPMENT CORPORATION  
1110 AVENUE N, SUITE 1000, SEASIDE, CALIF. 92082  
TELEPHONE (619) 441-1111 FAX (619) 441-1112  
TELETYPE (619) 441-1111

St. Mary Lodge and Resort—0665

1. Please see the new preferred alternative (A1) for visitor use on the Going-to-the-Sun Road. The preferred alternative now calls for preparation of a comprehensive use plan for the Going-to-the-Sun Road.
2. The *General Management Plan* is intended to provide general guidance for park management and direction on specific issues currently facing the park. It is against NPS policy to continue to manipulate Divide Creek. The manipulation becomes more costly each year and would not be a permanent solution.

The Going-to-the-Sun Road is exempt from compliance with the executive order on floodplains. Its closure due to flooding would not be likely to place lives at risk. The St. Mary visitor center is outside the 100-year floodplain; it is on higher ground than the road surrounding it. We believe that this document adequately addresses the issue and provides clear guidance on the future direction for the Park Service in this area. The issues you raise would be considered in a more site-specific plan for relocation of these facilities.

3. A new preferred alternative has been included in volume 1 of this final document.

COMMENTS

RESPONSES

3

considerative (or accessible) impact to the surrounding area. This decision should be made making in conjunction with a public advisory committee.

4

- Designation of Glacier National Park as a Wilderness. Glacier National Park was set aside as a National Park and not as a National Wilderness Area. We are surrounded by a great number of acres of wilderness area in the Bob Marshall and Roosevelt Wilderness Areas. It should be pointed out that those wanting a wilderness experience have it readily available to them in these two large areas. Managing Glacier Park, or any percentage of it, as a wilderness area, as opposed to a National Park, fits in the time of the initial intention of the U.S. Congress. Putting a percentage of 5% developed and 95% wilderness has the heads of the National Park Service in better able to adequately plan for the increased visitation, and maintaining a quality experience for those wishing to see this beautiful area. I am not suggesting that we turn Glacier Park into a Wilderness, but I do feel that setting here-time percentages as to how this resource will be managed, definitely obstructs futuristic thinking, and the ability to have a visionary approach.

I appreciate being given the opportunity to speak at the hearing in Yellowstone, and sincerely hope that my thoughts here are recorded as well.

  
Mark  
Yellowstone Director

MR-148

- 4. The proposed wilderness in Glacier must be managed as if it is wilderness until Congress makes a final decision on its status. Please see the discussion on proposed wilderness in the "Affected Environment" section.



COMMENTS

RESPONSES

2

1 ideas for preserving grizzly habitat. These,  
 2 apparently, have been abandoned in this draft. We're  
 3 disappointed by that. Human encroachment is the leading  
 4 cause of grizzly mortality. Development that  
 5 facilitates greater levels of human encroachment harms  
 6 grizzly bears. Developing towns that encourage  
 7 access to grizzly habitat, as an example, is  
 8 inconsistent with protecting the grizzly bear, under  
 9 the mandate of the Endangered Species Act. So, we  
 10 discourage you and ask you not to participate in that  
 11 kind of development that leads to greater presence of  
 12 humans in grizzly bear habitat.

13 Next, we support the ban on personal  
 14 watercraft. I think that's consistent with the  
 15 wilderness aspect of the Park. And there are certainly  
 16 opportunities for that type of recreation on water  
 17 bodies nearby the Park, so there's no necessity to  
 18 maintain them within the park.

19 Fourth, we support the ban on overflights  
 20 within the Park. And, finally, we want to stress that  
 21 we're against anything that expands the amount of  
 22 pavement within Glacier National Park. We've not  
 23 really certain, from looking at the documentation that  
 24 I've seen so far, what the impact of your paving or  
 25 the establishment of new zoning categories within the

BRUCE-LARK & ASSOCIATES, Inc.  
 (408) 542-2447/722-0649

2. Please see the new preferred alternative for "Visitor Use on the Going-to-the-Sun Road."

## COMMENTS

## RESPONSES

14 0653

1 Park is. Again, we refer you back to our first point  
 2 that 95 percent of the Park is proposed as wilderness  
 3 and, as such, must be managed in that way. That,  
 4 together with the mandate to protect the grizzly and  
 5 also the need to protect other sensitive species like  
 6 wolverines, mountain goat, mountain sheep, lynx and  
 7 other animals like the gray wolf that is also  
 8 endangered, are principles that you should use in  
 9 guiding your management of the Park. There is plenty  
 10 of opportunity for enjoyment of the wilderness areas as  
 11 in cow stands, and we would oppose further development  
 12 that would reduce the possibility of those animals  
 13 coexisting with humans in the Park under the current  
 14 level of use. Thank you.



**BITTERROOT-MISSION GROUP  
SIERRA CLUB**  
509 738 8888, MONTANA 59907

1152

Superintendent, Glacier National Park  
GMP/EIS project  
Glacier National Park  
West Glacier, Montana 59906

Nov. 20th, 1998

Dear Superintendent,

We in the Bitterroot Mission group of the Sierra Club thank you for the opportunity to submit comments on the draft General Management Plan for Glacier National Park. We recognize that park management is a continuous issue and that you have put considerable effort into producing this draft GMP. The following are our main concerns and suggestions.

**Wilderness:** 95% of the Park, while not yet designated as part of the National Wilderness Preservation system, is to be managed as wilderness. We value the Park for its wilderness qualities and request that you do not implement any management or activities that diminish the wilderness character of these areas. We suggest that you keep the term "wilderness" as a descriptor for these areas because we believe that it conveys to the public important values and a management philosophy that they understand and support.

1

**Ice Sills, Overlooks and other roadways:** We support the ban on motorized vehicles and overights of the Park. Please preserve the wild character and ecological integrity by enforcing these bans.

**Winter Access and Facilities:** We support only limited increases in winter access. While some routes are discussed, many routes require special structures in winter and are inherently susceptible to disturbance. We request that all increases in winter facilities are primitive and in keeping with the ecological needs of all species.

**Increased Winter Services:** While we recognize that park use has increased substantially in the last decade, current trends show a slowing and/or increase in this increase. We believe that many improvements in facilities are necessary to maintain basic health and operations, but we request that all Park improvements be subject to a separate, project-specific NEPA process to determine their viability, suitability for the Park, and public concerns. We request that you offer the public a thorough economic analysis of costs and benefits of any new developments as part

2

"Not only opposition to progress, but opposition to blind progress."

Sierra Club, Bitterroot-Mission Group(11/26/98)—1152

1. Please see the responses to the comments of the Montana Wilderness Association, the Wilderness Society, and Friends of the West.
2. The National Park Service must comply with NEPA on all projects.

COMMENTS

RESPONSES

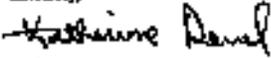
2

of the NEPA process, including mitigations such as establishment of wildlife habitat and water pressure.

In general, we are concerned with the potential for increases in facilities to diminish the wild character of the park and its ecological integrity. In particular, we request that all new park facilities, especially around Laguna pond, are carefully sited to avoid shading, blocking and travel corridors for grizzly bears. We do not wish to see any increases in pavement in the Park and ask that you site all new developments in an ecologically sensitive manner, considering when possible development outside of Park boundaries.

Thank you for your consideration of our comments. Please keep us apprised of this process and any decisions as they occur, and please feel free to call or write if you have any questions.

Sincerely,



Katherine Daniel  
for the Sierra Club Ellicott Mission Group

0060 *5/20/82*



Silver Wolf Log Chalet Resort—0060

OFFICE OF THE SUPERINTENDENT  
GMP PLANNING CENTER, GLACIER NATIONAL PARK  
WEST GLACIER, MONTANA 5993

GENTLEMEN:

I AM WRITING MY COMMENTS IN THE HOPE THAT YOUR PROPOSED CLOSURE OF THE ROAD TO THE SUN ROAD FOR A PERIOD OF FOUR OR FIVE YEARS WILL BE POSTPONED UNTIL A MUCH BETTER SOLUTION CAN BE IMPLEMENTED.

IF YOUR CLOSURE TAKES PLACE NOT ONLY WILL I LOSE MY BUSINESS, IF I DON'T GET GOVERNMENT HELP, THE ENTIRE FLATHEAD VALLEY WILL SUFFER. SKIING, HUNTING & SOME SMALL BUSINESSES MAY NOT BE ABLE TO RECOVER AS WELL.

THE PARK SERVICE HAS KNOWN FOR YEARS THAT THE ROAD WAS GOING TO NEED MAJOR REPAIR, AND OTHER YEAR CLOSING THE ROAD, THEY HAVEN'T COME UP WITH ANY GOOD AND BETTER IDEAS.

NOW IT SEEMS THEY HAVE SOLD A LOT OF PEOPLE A BILL OF GOODS, WITH THE PLAN, THERE ONLY SOLUTION, OR THE BEST SOLUTION FOR THE HEADQUARTERS AT THE PARK SERVICE.

THE PLAN, IT IS FULLY BOUND WITH A BUNCH OF COPS & PLINY OF NOSE FACTORS, BUT NOTHING CREATIVE WORTHY OF PAPER.

WHO SHOULD THE LOANERS WHO ARE SO CALLED GOVERNMENT SHUTDOWN, BY THE GOVERNMENT GOVERNMENT EMPLOYEES THATS WHO THEY DON'T LOSE A PENNY, THEY RECEIVED A FEW WEEKS PAID VACATION. THEY WON'T LOSE A CENT WHEN THE ROAD CLOSURE BEGINS, NOT A DIME PAY, BUT WE WILL.

IT IS OK FOR THE PRIVATE SECTOR (WHO PAYS THE SALARIES AND THEIR EMPLOYERS INCOME, FOR THE GOVERNMENT CIVIL SERVANTS) TO SUPPORT LOANS, NOT ONLY WOULD THEY BECOME EXTREME LIFE SAVINGS AND INVESTMENT, BUT DON'T TAKE EVEN A DIME'S PAY FROM A GOVERNMENT EMPLOYER, BECAUSE ITS COST THEM MILLIONS FOR THE SYSTEM THAT GIVES THEM NOT ONLY THE BEST BENEFITS AND HEALTH INSURANCE, BUT NOW EXPENSE AN 1/2% IN BOND OVER THE NEXT TWO YEARS, BECAUSE THERE MORE MONEY TO BE SPENT, SO LETS SPEND IT WHEN IT GET THE VOTES.

IF BILL CLINTON CAN GET THE PEOPLE IN TEXAS & OKLAHOMA ALSO BELIEVE TO BUY FANS AND AIR CONDITIONERS ETC. FOR A HOT SPELL.

*Designed by Charles J. For*  
200, 201, 202 • Flathead, Montana 59901  
509-837-2227

COMMENTS

RESPONSES

THAT LIKE A BAD HANDED W... OR A WEEK, THEY BE ON  
 THE GOVERNMENT ONE SIDE... LOCATE THE NECESSARY  
 FUNDS FOR THE ROAD REPAIR... THIS  
 VALLEY IS GOING TO LOOK

BY THE WAY IF THE PEOPLE IN... CARE TO SAVE THE  
 NECESSARY MONEY TO FUND... OWN PARKING. WHO'S FAULT IS  
 THAT?  
 DO WE NEED TO BUY THESE BEACHES THE WINTER IN CASE OF A THIN  
 OR FINE WINDS COULD SWELL OR FLY FRAGMENTS IN CASE OF BREAKDOWN  
 OF BEACHES DO TO A BARRY BEACHES THE ANSWER IS YES IS IT WELL-BUY  
 YOURS

I AM NOT KIDDING WHEN I SAY I COULD LOOK EVERYTHING MY TIME  
 AND I HAVE WORKED FOR OTHER YEARS. I HAVE NEVER LOST A  
 HOME FROM THE GOVERNMENT I MUST ADD YOU SEE THE CASE OF THESE  
 BARE BEACHES OF PERSONS, I WORK HARD TO ACCOMPLISH SOMETHING IN  
 MY LIFE.

IF THE CASE FORWARD AS PLACED WITHOUT "JUST COMPENSATION" YOU  
 WILL SEE A LAWYER LARGER THAN YOU BEING BEACHED BY THE  
 "GOVERNMENT AND REMOVING COMPENSATION IN THE PLACE" I AM NOW  
 PREPARING TO PAY UP \$200 DOLLARS FOR MY BEACHES OF THE LEGAL  
 COST FOR A PRESENT LAW FIRM TO REPRESENT OUR INTEREST.

THE SOLUTION IS REALLY QUITE SIMPLE OF COURSE, BUT ITS GOING TO  
 TAKE SOME BEACHES AND ARE TWENTY BY THE PARK SERVICE AND  
 MATCH SOME OF YOU IN THE SERVICE WHO SPREADS THIS WILL BE  
 POLITICALLY UNDESIRABLE, BUT THE PARK IS NOT FOR THE PARK SERVICE,  
 ITS FOR THE PUBLIC TO ENJOY AND THE PARK SERVICE TO MAINTAIN  
 THE BEACHES THEY DO DO.

THE ANSWER IS TO REPAIR THE MANY BEACHES ROAD TO THE PEOPLE  
 MORE ROAD" WHICH WOULD CREATE A LOOP. THIS HAS BEEN MENTIONED  
 FOR A LONG TIME AND THROUGH BUT BAREY YEARS. WITH THE  
 EQUIPMENT THE ARMY CORPS OF ENGINEERS HAS NOW, A MUCH EASIER  
 TASK THAN THEY WHO BUILT THE ROAD MUCH WITH ELBOW GREASE  
 AND SHOVELS IN THE TWENTIES.

THIS WOULD ALLOW, AFTER THE CONSTRUCTION, TO REPAIR THE CORNS TO  
 THE SUN ROAD AT ANY TIME IN THE FUTURE. AND FUTURE REPAIRS TO  
 THE NEW ROAD, BY CLOSING ONE OR THE OTHER, AS NEEDED, NOT TO  
 MENTION EMERGENCY CLOSURES WHICH HAPPEN FROM TIME TO TIME,  
 ACCIDENTS, ROCK SLIDES ETC.

IF THIS IS MARKED CURRENTLY, IT SHOULD BE LARGELY "THE GOING TO  
 THE SUN ROAD TWO" OR EQUAL. THIS WOULD REMOVE PUBLIC ENTRANCE  
 AND KEEP THE VISITORS COMING TO THE PARK, WHICH WOULD IN TURN  
 HELP PAY FOR THE INVESTMENT.

SINCE ONLY 5% OF THE PARK IS NOW OPEN TO THE PUBLIC, THIS WOULD  
 ADD ONLY ANOTHER 2% OR SO. SINCE THE VAST MAJORITY OF VISITORS  
 ONLY WALK OFF THE ROAD ABOUT A QUARTER OF A MILE, IT WOULD  
 HAVE LITTLE OR NO EFFECT ON THE ECOSYSTEM.

Deputy Log Clerk for the  
 20, 21 & 22 - West Glacier, Montana 59923  
 406-887-2622

1. Building another road in the park was considered but rejected. The National Park Service does not have the funds to maintain the current roads, and it is unlikely that funds would be available to build a new road and maintain it. Furthermore, with a few exceptions, the National Park Service is not building new roads in parks, particularly in parks such as Glacier, where the resource impacts would be far too great.

1



THE OTHER SIDE OF THE ROAD SHOULD BE REVERSED AFTER A  
LARGER AREA OF ROAD TO THE WEST SIDE CONSTRUCTION, AND BY  
ADDRESS ANOTHER THROUGH ROAD TO THE EAST SIDE THE MOUNTAIN PARK  
IT WOULD RELIEVE THE PRESSURE ON THE WESTERN VISITORS CENTERS.

THEY WOULD PLACE NEW AND AHEAD SIGNAGE ON THE FAR WEST  
BOUNDARY OF THE PARK WOULD VISITORS IN LINE.

BELEIVE ME, AS THE POPULATION GROWS THROUGHOUT THE COUNTRY,  
MORE AND MORE PEOPLE WILL BE LOOKING FOR PLACES TO GO WITH  
LESS CONGESTION, THE ROAD IS GOING TO BE NEEDED SOONER OR LATER.

LETS DO THIS RIGHT, AND DO IT NOW, "SOONER THAN LATER"

I CAN BE REACHED AT MY 442

HEARTILY & DETERMINED VOICE WITH A BELIEVER

*Handwritten signature*  
MARIO S. MONTANO  
8/20/78

THE NEXT BORN OF THE PEOPLE AND BUSINESSES THAT WILL BE DIRECTLY  
IMPACTED OR DISADVANTAGED;

RESTAURANTS-RESTROOMS-BOATING-FOOD SUPPLIES - SERVICE STATIONS-  
GROCERY STORES- SMALL 2- FISHING STORES-RESTAURANTS-RAVING  
COMPANIES-CAR RENTALS-SPORTS EQUIPMENT & LAUNDRY SERVICES-  
TOUR-LEFT BOTTLE-BOTTLE, MOVIE, AND MERCHANDISE AND THE MANY OTHER  
SERVICE PROVIDER EMPLOYERS.

Deputy Executive Director  
202, Box 112 • 8900 County Center, Carson  
89402-0112

COMMENTS

RESPONSES

0512.  
 21                   HARRY HAMMER: It is Hammer, H-~~XXXXXXXX~~.  
 22 It's Keith. K-a-i-t-h, thank you.  
 23                   I think that's the first time a potty break is  
 24 called a technical adjustment. I'm pretty sure.  
 25                   I also would like to express my appreciation for  
 GOSWELL REPORTING (408) 848-4428  
 P.O. Box 1182 Whitefish, MT 59937

Swan View Coalition (hearing, Hammer)—0512

Thank you for your comments.

34

1 the opportunity to speak tonight for a few minutes. I'm  
2 speaking as the chair of Swan View Coalition. Do you need  
3 that in detail? There's a number of points I'd like to make  
4 here. I think I'll do it by talking a little bit about a  
5 visit to Glacier this summer.

6 I made a hike into Glacier this summer into the  
7 Sunsite Lake and Jackson Glacier, and it's a trip I haven't  
8 made probably in ten or fifteen years. And the experience  
9 in some ways is quite different in extent than ten or  
10 fifteen years ago. And I usually--well, first, I want to  
11 mention that it was very positive to be able to go into  
12 Glacier and catch a hike shuttle. Leave your car at West  
13 Glacier, take your backpack, go in the park for six dollars,  
14 twelve dollars, get your business done and not have a car,  
15 not have a car left in the parking lot, not be creating the  
16 need for any bigger parking lots. And I want to mention  
17 that as a positive experience and encourage the Park Service  
18 to pursue a public transportation system in Glacier as soon  
19 as possible. And I'll talk a little bit more about that.  
20 In other words, expand it beyond a hike shuttle by a long  
21 ways.

22 It's usually my policy when I go backpacking to  
23 take my watch off as soon as I leave the road, check it away  
24 and not look at it until I get back after the journey to my  
25 car or to my home. But it wasn't too far down the trail

BOZEMAN REPORTING (406) 463-4228  
P.O. Box 1182 Whitefish, MT 59937

## COMMENTS

## RESPONSES

35

1 hiking up to Converse Lake, after about the fourth or fifth  
 2 helicopter went overhead, that I pulled my watch back out  
 3 because I was thinking to myself how often is this  
 4 happening? And over two days I kept track of it. And it  
 5 was on the average of every 15 to 20 minutes in what is  
 6 designated as a wilderness area in the park was the way,  
 7 way, way of helicopters, 15 to 20 minutes on average for two  
 8 days. And so I want to say that positively here that the  
 9 move on the Park Service to limit these overflights, to keep  
 10 my new overflights, I fullheartedly agree with an others  
 11 have spoken here tonight. I would go a step further and  
 12 rather than saying we should be phasing out the current  
 13 overflights, we should put an end to it ASAP.

14 And some folks have talked about the Grand Canyon.  
 15 I had an experience in Volcanso national Park in Hawaii, an  
 16 area where the lava was flowing into the ocean and of course  
 17 a really magnificent steam plume coming up. And I'm down  
 18 there trying to take a picture of this. I get home and I  
 19 develop the film, and there's five helicopters in this  
 20 little 35 millimeter frame, night-vision helicopters. And I  
 21 just would add that to the reasons why you can just never  
 22 nip this in the bud too soon, in a national park. And so I  
 23 would urge that the park do this as soon as possible to  
 24 eliminate these overflights, helicopters and fixed-wing.

25 Back to my little trip up into Jackson Glacier. a

COMMONS REPORTING (406) 663-6828  
 P.O. Box 1182 Whitefish, MT 59901

COMMENTS

RESPONSES

1 little bit of a detour here because it's not a part of the  
 2 major management plan. But, again, to look at wilderness  
 3 areas, the far backcountry of the park. There's some talk  
 4 within the park of improving the trail that goes from the  
 5 Smalls Lake to Jackson Glacier. It's a nasty little trail.  
 6 It's really brushy, you know, it's not just not a very good  
 7 trail. But because of that, I was the only person in the  
 8 basin back there at Jackson Glacier. And I just think it's  
 9 kind of like when you build more parking lots, you're going  
 10 to have more cars. The same thing if you improve the trail,  
 11 it's going to be really tough to have these kind of  
 12 experiences in the backcountry and the wilderness portions of  
 13 Glacier National Park. So I would encourage the park into  
 14 really look seriously into this idea that we constantly have  
 15 to improve and improve and improve the facilities at Glacier  
 16 even far back into the country trails.

17           Probably even more remarkable is two days later  
 18 after hiking, I made the loop, came down past Sperry Chalet  
 19 and on down the trail and got back down to the highway, and  
 20 there's a string of cars as far as the eye could see. So  
 21 you're standing there with your backpack waiting to cross  
 22 the road to get to the parking lot there at Lake McDonald  
 23 Lodge. And, again, I just say that now is the perfect  
 24 juncture to pursue public transportation, to make those  
 25 kinds of things now while you're making decisions about the

GOVERNMENT PRINTING OFFICE: 1967 O-343-622  
 P.O. Box 1102 Whitefish, MT 59917

## COMMENTS

## RESPONSES

CFR 37

1 Being-Tu-Thu-Sun Road that we need public transportation.

2 I also would like to say that your policy on jet  
3 skis is excellent and it should be made permanent. You  
4 should maintain the policy on no snowmobiles you have in  
5 Blaine and never ever reconsider that consideration it's a  
6 good one.

7 I'd say that the discussion on improving  
8 facilities for winter recreation, again, I think it fits in  
9 that same category of keeping Blaine the way it is.  
10 There's plenty of opportunity for winter recreation and to  
11 keep all our ideas of development outside the park, thank  
12 you.

0831



November 30, 1994

Mr. David M. Wolfe, Superintendent  
Claremont National Park  
West Claremont, NY 12094

Mr. Christopher M. Deitz, Air Cluster National Director

New Departmental Building,

These comments are provided by the United States Air Tour Association (USATA) based in Washington, DC, and are made on behalf of Clinton Hill-Tops (CHT), USATA's member-owned Clinton National Park. USATA supports 22 air transportation and related companies in the United States. Air tour operators represented by USATA average three days a week, seven months a year. FAA Part 135 is the regulatory authority for all scheduled Part 135 flights and Part 135 is the primary air service provider.

Regulated Air Tour Operations

Let your staff know that the regulatory requirements would not be the opportunity to see America's air-ports via air tour. Air-touring is generally popular for people whose time is limited and who simply do not have the time to take the bus to the park. Air-touring also is popular among the elderly, disabled or those with other health conditions. At the same time, USATA has found that many tourists who take air-tours also visit the park on the ground, in order to obtain an overall perspective of the landscape and to experience the Park's scenic and historic values.

The air tour industry, while perhaps not the largest segment of visitors to the CHT, nonetheless is a significant part of the air transportation and travel and tourism industries in the country. We also have a significant economic impact on the nation and the local communities where our members are based. Nationally, the estimated economic impact of the air tour industry is well over a billion dollars.

Air Types and The Environment

USATA members are generally environmentally sensitive and seek to avoid operating other vehicles in national parks and other public lands. Air tour operators are the most environmentally responsible type of air transportation.

USATA members are generally environmentally sensitive and seek to avoid operating other vehicles in national parks and other public lands. Air tour operators are the most environmentally responsible type of air transportation.

United States Air Tour Association, 1000 Pennsylvania Avenue, N.W., Washington, D.C. 20004  
Phone: (202) 462-1000 Fax: (202) 462-1001  
Web: www.usata.org

U.S. Air Tour Association—0831

1. Air tours do not impact the park in the same way as visitors using automobiles. All means of visiting parks, including air tours, have impacts on park resources and park visitors. It is almost never possible to meet all the desires of all types of visitors; that is why we prepare general management plans and manage the park for an appropriate range of visitor experiences while providing resource protection. It is the task of a general management plan to enable managers, with the public, to carefully weigh the benefits compared to the impacts of all the various forms of visitation that might occur in a park and determine the mix of activities and restrictions that would best meet the park's purpose, significance, and legislative mandates. The public overwhelmingly supported the preferred alternative regarding air tours. The rationale for the park's preferred alternative regarding air tours is found in the following sections of this document:

statements about the park's significance

description of the scenic air tours issue and alternatives

description of the impacts of all no-action alternatives.

1

COMMENTS

RESPONSES

Air Class 100000  
November 24, 2010  
Page Two

1

information. It will show and show how good, useful, and have no bearing on safety or other safety related. Air line passengers along by various ways, shown in the right below, which is a professionally prepared description of the same which is both informative and educational, take a few minutes and which bearing on how they over view them.

Air line, provides a high level way for many airlines to experience national, parks and other areas.

**Outstanding Air Force Responsibility**

To give you some indication of the information that air line provides have beyond providing business in a professional and responsible manner, IATA, developed in US-Park Code of Conduct which is a standard of membership in IATA, and by which all IATA members abide.

**QUALITY-BESTIMUM AIR FORCE OPERATIONS EMPLOYEES OF CONDUCT**

The values of the air service industry are the highest in a professional, courteous, safe, and reliable and quality service to our customers in a safe, secure, reliable, courteous, comfortable and efficient manner.

**The following are the values that we strive to achieve:**

1. Operate with the highest level of professionalism and responsibility.
2. Maintain the highest industry standards of aircraft safety and pilot qualifications and performance.
3. Fly straight - level, solid, and secure - as quickly as possible commensurate with safe operating procedures and practices.
4. Operate aircraft in a way which provides passenger comfort, enjoyment, safety and satisfaction.
5. Provide courteous, safe, and efficient air service to our customers, including, but not limited to, the handling and operation of baggage and mail and the handling of cargo and mail.
6. Be sensitive to the wishes of other airlines and to the wishes of our customers on the ground and in the air.
7. Avoid flying air line routes over areas where unapproved flights or other aircraft operations would be particularly disruptive to the public.
8. Be environmentally sensitive, including in particular, to protect and preserve the environment and the interests of the public.
9. Conduct business in a manner which respects and protects individual, racial, ethnic, and gender concerns.
10. Provide quality customer service.
11. Uphold responsibility with all segments of the community.
12. Always be good neighbors.

COMMENTS

RESPONSES

John Thomas Mitchell:  
May 2009, NPS  
Troy Thomas

As you state that TRACSA's 15-Pair Code of Conduct is in compliance with the way in which Glacier National Park, directly or indirectly sponsored by Army, Navy, Air Force and Coast Guard and based in West Glacier, MT has consistently conducted its air tour business and its working relationship with management of Glacier National Park.

Glacier Helicopters

Glacier Helicopters is an FAA Part 135 commercial air-transport helicopter company. It has provided aerial tours of Glacier National Park since 1988. In 1987 and 1996 Glacier Helicopters flew 1,346 tours and provided approximately 10,000 passenger flights for 2,500 passengers. That's a total of 1000 hours per year. Glacier Helicopters is also licensed to fly 15 pairs per year. That's only 150 hours per month or approximately 4.5 hours per day. Glacier Helicopters also conducts search and rescue, fire suppression, medical evacuations and other services for park management and voluntarily to us and the park management as requested. In the past several years, Glacier Helicopters served the air tour business by conducting the air tour during both types of emergency situations and was directly contacted as requested by the Park for the emergency and rescue services it provides.

2

The Park's Opposition to CHRT Air Tours

There is no regulatory air tour operations at Glacier National Park, a closed area, that is not in compliance with park management and voluntarily with park management to provide the best, most acceptable and least intrusive aerial search and rescue services through the park. Glacier Helicopters provides the primary type of the park - a non-helicopter and a 100% safety zone. As management was requested to provide Glacier Helicopters with Glacier National Park regulations regarding search and rescue services, Glacier Helicopters has always complied with the park and will always comply with the park's regulations. As a result of Glacier Helicopters, there has been no opposition from the park to either CHRT's search and rescue services they have implemented in 1998.

3

In the fall of 1997, Glacier National Park began a two-day "Search and Rescue" exercise involving the National Park Service, Knappton, and the citizens of surrounding in that area. It is important to note that Glacier Helicopters was the only air tour operator to participate in the Search and Rescue.

4

During the exercise, Glacier Helicopters demonstrated that it was the only operator that was able to provide search and rescue services in a timely manner. Glacier National Park management had enough experience on mountain to be able to provide search and rescue services, in fact, was not able to provide search and rescue services with the CHRT search and rescue. Park management always in opposition to either the search and rescue services being provided by CHRT.

Therefore, in the last years Glacier Helicopters has been conducting aerial helicopter tours of Glacier National Park, which have been in compliance with park management, provide the search and rescue services being used, search and rescue services provided by park management to search and rescue over the park.

That is a result of both park management and Glacier Helicopters that they have been able to design and implement, in a timely and effective manner, a search and rescue service that is able to be provided by Glacier Helicopters can be effectively integrated into the search and rescue services for all visitors.

2. Glacier National Park pays for the helicopter services it receives for emergencies. If emergency flights result in an operator flying only for the park, it is by the operator's choice. In a prolonged emergency, the government believes it is more cost-effective and efficient to deal with an operator who will fly only for the government during the emergency.
3. Although there have been discussions, there is no "negotiated" flight route plan for commercial air tours over the park.
4. The purpose of the meeting was to elicit ideas, not to negotiate or approve routes. The National Park Service does not have the authority to approve or deny these flight routes.

COMMENTS

RESPONSES

Mr. Dave Kight  
November 20, 1996  
Boys Run

Clarify EMAP Air Tour Section, Paragraph

5

As a general comment, IRLA's believes in both reasonable and appropriate for (Clarke National Park) to include in the Current Management Plan (CMP) address air tours. Indeed, IRLA's does not object to Clarke Park management affecting those aircraft/aircraft activities on the base base. However, under the circumstances, we favor a park management affecting a "policy, strategy" -- in this case is possible air tour -- in the base in the base base. We find Clarke National Park's management to be the same management and a serious breach of EMAP on the part of the Clarke Park Service.

Expand Basis Under Development

6

As the management of Clarke National Park is under the National Park Service (NPS) and National Aviation Administration (FAA) are well into the process of developing national rules to address the issue of air touring over national parks.

In May of 1997, under the direct auspices of the White House, the Federal government convened an Aviation Policy Working Group (APWG) Working Group to address the issue of air tours over national parks. The APWG, composed of both members, has worked for some time. In parallel to design a set of recommendations and defined regulations on air tours at national parks. Four members of the working group represent various aviation interests -- one was directly involved in the air tour industry -- two members represent the National Park Service and the Department of the Interior, and two members represent the United States aviation industry.

The working group has held numerous meetings in Washington, DC and Denver, CO. While the majority of the first meeting, all working members have been open to the public and there has been a significant amount of public input into the process. Indeed, representatives from Clarke National Park have attended a number of these sessions and provided their input into the process.

Significant to the acceptance by both sides that aviation issues should be dealt with air issues separate of other management and provided very the results to air national parks. Significantly important to the acceptance by the members of the working group that general aviation is national parks should have the opportunity to enjoy the special sounds generated by propeller planes, while it is possible and the visual beauty through the land.

With this as a starting point, both sides have sought to design regulatory provisions that are flexible that would satisfy the interests of all park users.

The APWG working group agreed on a set of principles relating aviation operations, National Park Service, National Aviation Administration, environmental, general aviation and other land users would address in a planning process in January 1997. Issues to which aviation at a particular national park would be applicable had been discussed into the overall park plans.

The group further agreed that, while it is important that a broad participation of government officials, we do not see the general public should participate in the planning process. It is important that the Federal Aviation Administration (FAA) maintain its jurisdiction over the management of the national air transportation system, and retain their regulatory jurisdiction over aviation for both the flying as well as the management of the system. This was a point that was strongly supported by key members of the United States Senate and House of Representatives to include National Aviation Council Board.

- 5. A preferred alternative for scenic air tours was identified because Department of the Interior guidelines regarding air tours require that government agencies identify a preferred alternative at the draft stage of an environmental impact statement.
- 6. This plan acknowledges that national rules and legislation regarding air tours over national parks are under development. The statements made in the draft document about these national efforts are still valid. In particular, the plan says, "These changes would allow the National Park Service to work with the Federal Aviation Administration to develop a scenic air tour management plan for each park."



COMMENTS

RESPONSES

1616  
1617  
1618

6

5. The FEA shall identify whether the intent of the ATRM by approving administrative or civil penalties against operators violating the terms of their Part 133 permits and approving regulations. Should the FEA find the intent of the FEA, the FEA shall identify whether the intent of the ATRM is being developed.

7

FOR Example To That Different Policy on Air Tours  
The ongoing development of national rules on air tours near national parks - rules which would apply to Glacier National Park - is sufficient enough to ensure that the park's management is not in violation of any requirements or policies of the NPS. The ongoing development of national rules on air tours near national parks - rules which would apply to Glacier National Park - is sufficient enough to ensure that the park's management is not in violation of any requirements or policies of the NPS. The ongoing development of national rules on air tours near national parks - rules which would apply to Glacier National Park - is sufficient enough to ensure that the park's management is not in violation of any requirements or policies of the NPS.

8

Glacier National Park supports any federal or state rule that would be implemented by the park's management that is consistent with the park's management plan. The park's management is not in violation of any requirements or policies of the NPS. The ongoing development of national rules on air tours near national parks - rules which would apply to Glacier National Park - is sufficient enough to ensure that the park's management is not in violation of any requirements or policies of the NPS.

9

Further, the Glacier-NPS staff stated that "wildlife populations might not be directly affected, but the effects on the park's management have been documented, and the effects on the park's management are significant." Glacier National Park supports any federal or state rule that would be implemented by the park's management that is consistent with the park's management plan. The park's management is not in violation of any requirements or policies of the NPS.

10

The Alaska Region of the U.S. Forest Service submitted a study and report to the NPS in 1996. The study concluded that as long as helicopters remain at least 1000 feet above ground level, or higher and avoid flying in the vicinity of wildlife during early morning periods and landing, the helicopters present no significant impact on wildlife. The study also concluded that "in areas where helicopters are not used, the impacts on wildlife are minimal. The study also concluded that the park's management is not in violation of any requirements or policies of the NPS.

- 7. The public raised this issue from the beginning of the planning process, and an overwhelming majority of commenters urged the park to address the issue in the *General Management Plan*. The preferred alternative for scenic air tours identified in the draft document was approved by both the regional and national offices of the National Park Service in discussions with Glacier National Park management.
- 8. Glacier National Park's preferred alternative is based on park purpose and significance. The public response to the preferred alternative for scenic air tours has been overwhelmingly supportive.
- 9. As is stated in volume 1 of this document, scientific observations, including observations made within Glacier National Park, have demonstrated that airplanes and helicopters flown near the ground can disturb wildlife. While impacts on wildlife have been documented in other areas, no research at Glacier National Park has been conducted to specifically determine how its wildlife populations are affected by low flying aircraft. However, in preparing the document, the park staff reviewed studies of the effects of low-flying aircraft that had been conducted elsewhere (see the "Environmental Consequences" section).
- 10. The environmental impact statement that was prepared by the Alaskan Region of the U.S. Forest Service was reviewed by park biologists. Wildlife "habituation" is inconsistent with the requirement that the National Park Service "preserve the park in a state of nature".

COMMENTS

RESPONSES

Mr. Tom Malley  
November 20, 1994  
Page 10-11

11

In a separate study, the U.S. Forest Service conducted several samples of helicopter tour operations in Aspen, Alaska, in the 1980's. Alaska, The National Park Service, Juneau, Alaska - published in 1994, the Forest Service conducted: "The sound levels of the helicopters in this study were not high enough, nor of long enough duration, to pose a threat to hearing safety for either humans or animals. Therefore, the only possible adverse impact resulting from the helicopter sound is that of annoyance to people who reside in areas close to the helicopter flight paths."

Discussion

Chloris Helicopters is a quality company which, for the past ten years, has provided a quality air tour product to thousands of park visitors. Chloris Helicopters also provides a multitude of related emergency services to Glacier National Park. CHC management has always worked cooperatively with the Park supervisors and their management. It's normal air tour routes and altitudes were developed cooperatively with park management in the 1970's during which Chloris Helicopters has provided aerial sightseeing. Park management has not been subjected to CHC management that such tours were objectionable contrary to park policy or site usage.

Further, Glacier National Park voluntarily in permission in the conditions Chloris tours should be limited, particularly in view of the existing process in development guidelines for air touring over all national parks in the United States. Chloris has not requested any special privileges to justify its operations that are not negatively impact wildlife and should be limited, and Chloris has sought studies which have been conducted in other locations that clearly indicate Chloris tours do not cause a negative impact on wildlife. Additionally, Chloris CHC management has not requested any accommodations to support its request that park visitors are involved by the limited number of air tour operators approved by CHC.

Though observations were made by National Park Service media officials in Washington, DC that no accommodation of the public would be done by local parks or park management - positively or negatively - prior to the development of Air Tour Management Plans at national parks, Chloris's stated position is to have the issue over the park, but, indeed, demonstrated responsible to the point that it is highly unlikely that Chloris Helicopters can be denied entry to the ACHC process.

The General Management Plan for Glacier National Park as stated in the General Management Plan is as follows:

The overall philosophy is to preserve large portions of the park for their wild character, while providing traditional visitor services and facilities in areas that have historically supported them. Visitors should be able to experience the wilderness of the park from many vantage points. Visitors can benefit from interpretive programs, recreation and provide opportunities to experience wilderness, study, and enjoy the park. Cooperation with park neighbors should be emphasized in managing our wild resources."

12

CHCOTA would say have said in my letter. The National Park Service's policy is to limit the category of "wilderness use" that they have been provided by Chloris Helicopters for some time already. They would most likely give visitors the opportunity to "experience the wilderness of the park from many vantage points." Such tours protect and preserve the park's resources including the wilderness or facilities and safety passing

- 11. This document does not say that the sound levels from aircraft overflights pose a threat to hearing safety for either park visitors or park wildlife. However, it does point out that for many visitors, scenic air tours diminish their park experience and their appreciation of such park values as peace and tranquility.
- 12. Helicopter air tours do not fall into the category of traditional use. We consider traditional uses to include such activities as automobile sightseeing, horseback riding, hiking, and tour boats, which date from or predate the earliest days of the park. As the discussion of personal watercraft says, "as new types of recreational activity are proposed, the National Park Service must evaluate each activity individually to ensure that it is consistent with approved management direction." These reviews have been conducted in recent years with regard to snowmobiles, personal watercraft, and BASE jumping, to but name a few.



0085 *WA*



**Wascana Centre Authority**

3885 Wascana Drive, Box 204, Regina, Saskatchewan S4P 4M4  
 Telephone (306) 342-5555  
 Facsimile (306) 342-5555

September 1, 1998

Edith Forbairn  
 Acting Superintendent  
 Glacier National Park  
 West Glacier, Montana  
 59239

Dear Superintendent Forbairn

**General Management Plan - Overview**

Thank you for forwarding the above referenced document to me for my review. I enjoyed reading it and reflecting on not only the conclusions but the long history that was involved in getting to this point. I realize that I only had the Overview to read and that my comments might have been tempered had I reviewed the full document. I do appreciate what you sent however.

I pretty well agree with everything that is contained in the Overview and was really not too surprised at the results. My main concern rests with the actual implementation of the preferred alternatives. The toll might be there but the issues are a daunting task. The Sun Highway needs attention and I like the approach suggested; a painful few years but then it is done. Because it is the drive toward the park, it is critical that the route be attended to in one way or the other. I would like to see some focus on the southern multi-lane being considered as a way to spread out the traffic though. Either temporarily or permanently. Perhaps new attractions along it to entice visitors and not make them feel crowded. It is a nice route but relatively boring the way it is. This could be changed. Perhaps the new interpretive Center instead about at the Aggar intersection could be somewhere immediately east of West Glacier. Making the SUN Road 'one way' - as much as I would like to see it given the choice, would effectively force visitors to make the 'loop' around the park. Even if this was only enacted during the Sun Road construction period. Looping and dispersing traffic might be more fully considered to determine impacts and viability.

I was disappointed that some changes were not made regarding Sperry and Grizzly Park Chalets however the recommendations, so long as they were warranted positive and consistent with my feelings. Again, congratulations to you and the team.

1	
2	
3	

**Wascana Centre Authority—0085**

1. Park visitors are informed about Highway 2 around the southern edge of the park as an alternative to driving the Going-to-the-Sun Road. We know from exit surveys that a high percentage of park visitors would use this route if they could access Logan Pass from one side or the other, but not both. Your suggestions about ways to spread traffic out probably will be considered as part of the new engineering and economic studies for the reconstruction of the Going-to-the-Sun Road.
2. Please see the section on “West Side Discovery Center and Museum” and the preferred alternative under that issue.
3. One-way traffic flow, looping, and dispersing traffic to other parts of the park are all ideas that would be considered in the new engineering and economic analysis of road reconstruction. Also please note that volume 1 of this final document contains a new preferred alternative for the preservation of the Going-to-the-Sun Road.

COMMENTS

RESPONSES

I totally agree with keeping my boy and I and being almost out of the shot about  
Glasier (with the exception of emergency use)

Thank you again for sharing your process with me. Glasier is precious and a  
very very special part of my life experience. There are few trees there that I  
have not touched.

  
C. K. Ducharme ABLA  
Landscape Architect  
Director of Operations

Notes For my future savings to me would you please be so kind as to  
change my address from 7 Maple Place, Regina, Saskatchewan S4S 2A0 to  
my business address as indicated on this letterhead. Thank you. *CD*

1142



November 27, 1988

Superintendent David A. Millsie  
 GNPWS Project  
 Glacier National Park  
 West Glacier, MT 59469

Dear Superintendent Millsie:

My family and I are acutely interested in the Glacier National Park General Management Plan process, especially the repair of the Going-to-the-Sun Road (GTT&S Road). Because we have been in the tourism business for 22 years in West Glacier, Montana.

My grandfather, father, uncle and another partner purchased the West Glacier Mercantile holdings in the spring of 1946, and have operated and expanded the business steadily over the years. We have seen travel to Glacier increase gradually, and with that, new challenges for the Park Service in maintaining the quality of experience Park visitors expect, and challenges for us in providing the kinds of services travelers need: lodging, dining, groceries, grill shops, gas/diner, at the major Park entrance, West Glacier, and inside the Park, in Apgar. We employ up to 140 people every summer, and thus contribute to the local economy and community.

Our long-term perspectives and experience with Glacier Park and Park travel qualify us to comment on the Park administration's proposed alternatives for reconstruction the Going-to-the-Sun Road. We are not experts in engineering or geotechnics, the less building blocks of the proposed alternatives. But we are experts in our own institutional memory and experience, which has familiarized us well with the wishes and behavior of the traveling public.

Our business cycle follows closely the travel cycle of visitors to Glacier, which is seasonal and greatly dependent on the GTT&S Road being open—fall is, open across Logan Pass. As you know, the Road is generally open across Logan Pass

West Glacier Mercantile  
 200 Going-to-the-Sun Road — Box 200  
 West Glacier, Montana 59469  
 704-439-9222

COMMENTS

RESPONSES



from mid-June through mid-October. We are open from late May through mid-October. It is a short, critical season in which we make our living. Our livelihood is tied directly to the attitudes of the traveling public and their perception of their access to Glacier's attractions.

As summer travelers approach Glacier in June, it is of paramount importance whether or not they can drive all the way over the GTTS Road. They want the Road open, and they want it open all the way across Logan Pass. For many visitors, this experience is their definition of seeing Glacier. For businesses such as ours, our season does not begin to earnest until the Road is plowed open. We recognize the challenge and danger of snowplowing operations, and truly appreciate what the Park Service makes to open the Road as early as possible each year.

Annual cycles of GTTS Road opening and closing due to weather govern our business, but a closure of four to six years as suggested in the proposed alternative A in the Final Draft EIS/FEIS, is unprecedented and we believe effects on our business will be devastating. The reality, and even the perception of a closure of the GTTS Road will make the drive, and prevent a large number of potential visitors from making the journey to this relatively remote corner of Montana. Public perception of such a lack of access is already occurring as the discussion is covered by the news media.

We agree that areas of the Road need repair and undoubtedly, major repair in some sections, but believe that inclusion of a specific construction alternative in the pending General Management Plan for Glacier National Park is premature. Some engineering studies have been done on the Road, and sections of major concern have been identified, but no collective study has been done to accurately estimate the time required for the repair project. We were gratified that this point was made at the Hearing chaired by Congressman Hill on September 21.

In addition to further engineering studies, we would like to see additional economic studies. We disagreed with the use of a mail survey of Park visitors as the cornerstone of the economic impact study. Surveying individuals who were already here enjoying the Park was not a valid method because the sample of persons surveyed was skewed to begin with. It does not surprise me that 80% of those interviewed said they would return to Glacier over if access to Logan Pass was

West Glacier Mercantile  
 1000 Highway 200 West — Box 200  
 West Glacier, Montana 59936  
 Phone 406-838-0428

West Glacier Village (11/27/98)—1142

1. Please see the responses to the letter from Senator Burns.

1



traffic—they were less, they had the opportunity to see and other aspects of the Park were also beautiful, and other views were beautiful via roads. But the visitor who has never been here does not know about other Park roads. The general assumption among travelers is that if the GTTS Road is closed to any degree, the Park is closed.

We support a comprehensive Glacier National Park CMP to include a statement that sustainable use of the GTTS Road is an appropriate long-term use of the Road, and that repair and maintenance of the GTTS Road is essential. We recommend that the National Park Service offer the submission of any road reconstruction alternative until thorough engineering studies followed by sound economic impact studies are completed.

We look forward to hearing the outcome of further engineering studies to be funded by the million-dollar appropriation from Congress. We hope the Park Service will proceed with world-class construction from passageway alpine and mid-mountain road building experience. To plan for our business and prepare for the impact of this project, we need to know exactly how long this project will take. We cannot plan for "four to six years". How about one year? With an accurate construction timeline in place, an economic study should be conducted to determine the likely impacts to the immediate region and the State.

We are grateful for the various forums that have given the public the chance to become more educated about the CMP, and value our opinions. The Congressional Hearing chaired by Rick Hill was especially helpful in increasing the understanding of the complexity and importance of the GTTS Road issue. Thank you for the opportunity to comment on the Final Draft General Management Plan.

Yours truly,

Mrs. M. Lindgren  
West Glacier, Montana

West Glacier Microclimate  
200 Highway 200 West — Box 899  
West Glacier, Montana 59912  
708.233.5644

1

COMMENTS

RESPONSES

1145



November 30, 1998

Superintendent David A. Wicks  
Glacier National Park  
West Glacier MT 59904

Dear Representative Liska:

I have followed the GNP process with great interest.

The most reasonable proposal is the closing-to-the-land trail route and reconstruction of the trail.

As we have heard repeatedly in meetings, the best route selection is still unknown. The proposed closure period will 4-6 years would have some long-term effects on trail and regional accessibility. I appreciate that Glacier National Park does not only try to ensure the best of your interests. Preservation of the ecological and legal trail, the proposed route is discussed in your meeting notes.

To be up to the standard of a superior trail, the trail should be built with the same quality as the other trails in the park. I am sure a legal trail is possible, but it is not an ideal. In addition, it may be already inappropriate for the purpose of a national park.

Glacier National Park has a long history of providing an extraordinary experience for its visitors. The proposed trail route is a significant part of the park's history. I am sure that Glacier National Park will consider all feedback, ideas, and concerns you submit with a desire for the best. Thank you for the opportunity to comment.

Sincerely,

Bill Liska

West Glacier Information  
200 Highway 2, Box 100 — Box 100  
West Glacier, Montana 59904  
Phone: 406/831-4444

West Glacier Village (11/30/98)—1145

1. Please see the responses to the letter from Senator Burns.

1

**Wild  
Wilderness**

*"a new group that appreciates the value of wilderness"*



1154

November 25, 1998

Superintendent Mihalic,  
Gardiner Park,  
West Glacier, MT 59201.

Re: General Management Plan, Glacier National Park

Dear Supervisor Mihalic:

When I first read the latest Glacier Management Plan Overview, I was pleased to see that park planners had smartly backed away from the disastrous development plans outlined in earlier proposals. The idea of "Keep it like it is" seemed like you were finally on the right track.

I was, however, extremely disappointed that the revised Management Plan document was so irresponsibly superficial. It appeared as if all of the difficult issues had been glossed over. Well, I was appalled by the "Keep it like it is" message and thought if you had moved in the right direction.

It's not until I spoke with my peers in the environmental movement, that it became clear that Park managers were actually using a sleight of hand on Glacier and that the "Keep it like it is" message was largely meaningless. The message glossy booklet you produced, appears to be only that.... glossy!

The public has been denied a fair opportunity to contribute its participation in this important planning process not because you did not go through all the motions. But because all the motions were hastily staged and carefully manipulated.

On behalf of Wild Wilderness and our 800 registered supporters, I wish to make the following comments:

1

1) We feel it is critically important that the new plan required Wilderness Study Areas to be managed as true Wilderness (not as "Discretionary" or some new designation).

Wild Wilderness, Inc. 177th St. (941) 332-3264

Wild Wilderness—1154

1. Please see the responses to the comments of the Montana Wilderness Association and the Wilderness Society.

COMMENTS

RESPONSES

3) We oppose changing the central policy to the Bus Road corridor from "natural" to "visitor services."

5) Lake McDonald and Mt. Mary should be managed primarily for natural values. Tourism must come second. Maintaining and enhancing profits for the park administration should not be a management value of this plan.

4) We support the proposed Park bus on jail site. Thank you!

6) We support strict regulation of helicopter flights. Thank you!

5) We oppose the Park's Development Concept Plan for the Lake McDonald.

7) We emphatically believe there should be no new commercial development inside the Park. The West Glacier Portal is already totally treated with such commercial development. Let the park remain be a refuge from those types of facilities greedy people would build to attract profit from park visitors.

2

8) All unnecessary recreational and commercial facilities should be eliminated from within Park boundaries.

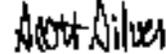
9) There is no need to gift shops within the park. They should be eliminated.

3

10) Interpretation should not be developed into a significant "attraction". Where this interpretation is provided, should be kept extremely low-key and unobtrusive. We adamantly oppose ruining the natural setting by distracting visitors with a levy of signs and displays that, while supposedly enhancing the experience, in reality ruin it completely.

Thank you for considering these comments. Please continue to keep WPA's wilderness treatment of continuing developments.

Sincerely,



Scott Silver  
Executive Director

2. The elimination of facilities is addressed under "Alternatives, Ideas, and Strategies Considered But Rejected."
3. We will continue to ensure that interpretive displays are not intrusive on the setting in which they are placed.



**THE WILDERNESS SOCIETY**

November 30, 1998

Office of the Superintendent  
 GMP Planning Office  
 (Glacier National Park)  
 West Glacier, MT 59936

Re: Final General Management Plan Environmental Impact Statement  
 for Glacier National Park

Dear Superintendent (William):

We appreciate the time and effort that has gone into the drafting of this document as well as the extensive public participation process. While we support some of the Park's proposed actions, we also have a number of concerns with the overall guiding philosophy, management goals, steps, and individual alternatives.

**Overall Guiding Philosophy**

While the overall guiding philosophy is to "manage large portions of the park as backcountry, while providing traditional visitor services and facilities in areas that have historically supported these uses," the GMP does not adequately address the potential cumulative impacts of [increasing] visitor use and development activities on wilderness resources, especially wildlife. We realize that the GMP does not make site-specific decisions, though the document's permitting approach on visitor services is disturbing and, in some cases, necessary in the document's growing descriptions of the Park's natural resources and ecological significance (including designation as a World Heritage Site and Biosphere Reserve).

The Park is obligated to "conserve the scenery and the natural and historic objects and the wildlife therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." (16 USC 1, 1914). All rights of the "Original Intent and Administration" listed in the GMP and with visitor use and operations rather than the protection and preservation of natural resources. Overall, the Draft GMP is a people and development plan, not a natural resource management plan.

The Final General Management Plan should emphasize the protection of natural resources and ecological integrity rather than expanded visitor use and services.

NORTHERN ROCKIES BIODIVERSITY CENTER  
 140 W. BROAD STREET, SUITE 2, BOZEMAN, MT 59713  
 (406) 556-1400 FAX (406) 556-1900



**The Wilderness Society (11/30/98)—1136**

1. Cumulative impacts are defined as impacts that result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions (Council on Environmental Quality regulations, section 1508.7). Cumulative impacts in the draft document are described in the chapter that evaluates environmental consequences of the plan in each of three sections: "Impacts for All the No-Action Alternatives," "Impacts for All the Preferred Alternatives," and "Impacts of all Other Alternatives." We believe that the level of evaluation of cumulative impacts in the draft document is adequate.

1

COMMENTS

RESPONSES

	<p><b>Geographic Areas</b> The division of the Park into five geographic areas is a positive move in recognizing the Park's tremendous diversity.</p> <p><b>Management Zones</b> We are concerned about the management zones depicted for each of the six geographic areas by the DMS.</p>
2	<ul style="list-style-type: none"> <li>• Within the DMSI identify the types of activities, structures and degree of development that will be allowed in these areas, the DMSI does not adequately define the physical boundaries of these zones.</li> </ul>
3	<ul style="list-style-type: none"> <li>• There is no clear indication that "rural" and "historical" zones will be managed as Wilderness.</li> </ul>
4	<ul style="list-style-type: none"> <li>• There is no indication of the process for updating the zone boundaries based on changing resource protection needs -- the concept for any updating seems to exclude cases based on new wildlife or historic park or wolf density or habitat grizzly bear use.</li> </ul> <p>Since this is the first GMP update in 30 years, we are concerned that the management zone designations will become outdated as new scientific data and visitor use patterns are discovered. Or, alternately, we are concerned that the Park will simply amend the GMP to expand development zones as visitor use increases. What is the process for revisiting the zone boundaries?</p> <p>The DMSI does not specifically define the boundaries of the management zones, resulting in confusion over inappropriate areas which should be managed as Wilderness (see Maps and Wilderness sections below).</p>
5	<p><b>Maps</b> The maps in the DMSI are schematic graphics at best -- they are not detailed maps complete with a coordinate scale provided in the entire document. This is a glaring deficiency that must be corrected in the final GMP and plan.</p> <p>The boundaries for the geographic areas and management zones should be delineated on a base map. This base map should part of the Park's GIS system. Along with vegetation and hydrology overlays, wildlife overlays should be included. Seasonal use, density and activity zones, and adjacent areas should be shown. The species such as moose, elk, mountain goat, bighorn sheep and black bear. The map should include overlays should be shown for sensitive, threatened and endangered species including the grey wolf, bald eagle, and grizzly bear. For instance, we believe that a number of potential visitor service areas be within critical grizzly migration corridors. These overlays should be shown along with the proposed management zones. The DMSI "Wildlife Considerations" map (p.57) is insufficient. Accurate maps would clearly show with potentially conflicting uses and zoning designations.</p> <p>The current DMSI maps reflect the most up to date, accurate maps in the final GMP. For instance, the Park's Wilderness Reconciliation Map (March 1974) clearly</p>

2. Please see response 3 to the comments of the Montana Wilderness Association.
3. Please see response 1 to the comments of the Montana Wilderness Association.
4. Please see the responses to the comments of the Montana Wilderness Association. Major changes such as changing a zone from rustic to visitor service would require an amendment to this plan, along with public involvement. The superintendent has the authority to permanently or temporarily close any area of the park to protect resources and/or visitors, regardless of the zone.
5. The maps and map overlays that you describe and dozens of others were not included in the draft document because of the need to try to limit the overall size of this document and because some of the information is protected. However, a number of different resource maps and information sources were consulted in delineating the zones. Some of the information we considered is shown on the Wildlife Considerations maps in the document. Also please see the responses to the comments of the Montana Wilderness Association.

The developed areas in the proposed visitor service zones are considered "situation three" grizzly bear habitat in the Grizzly Bear Recovery Plan. None of the actions that might occur in road corridors and in the visitor service zones would compromise their "situation three" designation. In addition, a variety of information was considered in developing the geographic areas and zones. Please see the responses to the comments of the Montana Wilderness Association.

COMMENTS

RESPONSES

6

depicts the wilderness boundary as enclosing the western slope of St. Mary Lake, while the DEIS Going-to-the-Sun Road Corridor map includes the southern slope within the visitor service zone (and future development). During the implementation phase, site-specific projects will need detailed maps that should align with the Final GRP URS maps. Additionally, specific, well-defined maps would, over the life of the GRP, illustrate additional direct management areas and wilderness boundaries.

**Wilderness**

We support the Park Service Wilderness recommendation for Glacier and hope to see day one that 85% of Glacier is protected as designated Wilderness. It's true, as the DEIS states that "Glacier National Park recognized the value of wilderness long before wilderness became rare."

By law, the Park Service is required to manage lands recommended for Wilderness so that their wilderness characteristics are not degraded. While we are pleased that, according to the DEIS, much of Glacier's boundary will be managed to maintain its present condition, we are concerned about some of the proposed area designations. Visitor service, trails and day use areas (as defined in the DEIS) are inconsistent with wilderness, and the reduction of wilderness characteristics. A comparison of the USFS Glacier Park Wilderness Recommendation map with the GRP DEIS maps shows a number of potential conflicts with the proposed zoning -- the southern slope of St. Mary Lake, Brocklebury Mammal Trail, part of Lake McDonald's northern shore -- again supporting the need for zoning, accurate maps. Glacier must ensure that areas such as those identified along popular trails and entry points into the wilderness (recommended for wilderness) can be managed in such a way as they become highly developed recreation zones.

Wilderness provides its own buffer -- lands recommended for Wilderness must be managed as Wilderness and therefore must be fundamentally sound as "backcountry", with an exception. Additionally, in protecting wilderness objectives and processes and in managing wilderness use in accordance with the Wilderness Act, the Park should adhere to the "intentional tool" concept.

**Indicators, Inventory and Monitoring Programs**

The DEIS repeatedly states that "Indicators, standards and a monitoring program will be developed in such that defined resource conditions and visitor requirements were achieved and protected," and "Tools and appropriate indicators and standards and a monitoring program would be developed..." (General Philosophy Section/Geographic

Highlights/Zone) The Final GRP should include a more detailed discussion of the success and social indicators, standards and monitoring programs that the Park plans to implement. (p. 24) This discussion should also outline the proposed structure for implementing a Visitor Experience and Resource Protection (VERP) or Levels of Acceptable Change (LAC) planning process.

7

8

6. Please see the responses to the comments of the Montana Wilderness Association.
7. Please see the responses to the comments of the Montana Wilderness Association and the Friends of the West.
8. We believe the discussion in the *General Management Plan* is adequate. Subsequent planning efforts will define indicators, standards, and a monitoring program in more detail. Also please see "Implementation Plans."

COMMENTS

RESPONSES

9

**Grizzly Bears**

The proposed zoning, especially the visitor service and day use zones will concentrate visitors in certain areas. The layout of this reconstructed and/or grizzly bears must be closely reviewed and coordinated. The DENR acknowledges that virtually any actions within the Park could impact the grizzly population. "Grizzly bears could be negatively impacted by increasing levels of visitor use, by visitor service construction, and by the most reconstruction along the Going-to-the-Sun Road." (p. 207) The DENR goes on to state, "The Grizzly Bear Recovery Plan for the Northern Continental Divide Ecosystem -- outlines the park's responsibility for actions that are necessary for the conservation and recovery of the grizzly bear. Implementation of this plan would result in, cumulative benefits for the recovery of the grizzly bear." (p. 207-208)

Major portions of the Grizzly Bear Recovery Plan were struck down by the Federal court in September 1999 and have still not been resolved. A grizzly bear Conservation Strategy for the Northern Continental Divide Ecosystem is still in the process of being developed. A complete, approved Cumulative Effects Model for grizzly bears in any ecosystem does not exist and a new model, "Assessing National Systemic Criteria" is still in the development stage. In the absence of an adequate Recovery Plan, a completed Conservation Strategy and an approved cumulative effects model, the Park Service must address to the most conservative management possible to minimize impacts on grizzly bears and to protect the grizzly from foreseeable harm.

**Future Planning Processes**

We understand the GRMP to be the first phase of a three planning and decision-making process and that site-specific environmental analysis and development planning will be undertaken. Elements of the general nature of the GRMP, it would be useful, in the final GRMP, to include an explanation of the planning processes that will be applied in order to carry out the recommendations contained within it. The final GRMP should articulate a list of proposed or anticipated planning efforts with an unfractured timeline that will include the public including such entities as the road work, lodging establishments, and the Observatory Center.

Regarding the eight specific issues and alternatives presented in the DENR, we have the following concerns:

**Within The on Going-to-the-Sun Road.**

We support the following elements of the Park's preferred alternative (A):

- remove an expanded transportation system
- provide bus services and shuttle service on the GTSR Road
- restrict bicycles and string park parking
- restrict vehicle length and width restrictions

10

9. Grizzly bear impacts were analyzed in the draft document; furthermore, the zones have not changed current use and developed areas in the park. We continue to monitor grizzly bear activities in these areas.
10. Please see the responses to the comments of the National Parks and Conservation Association. Also please see the "Implementation Plans" section in volume 1 of this document.

COMMENTS

RESPONSES

11 **Additionally the Park Service should:**

- establish a timeline for evaluating and developing an expanded public transit system and shuttle service
- eliminate the junction from the Logan Pass Visitor Center and relocate it elsewhere, such as in the proposed West Side Discovery Center
- not expand the parking lot at Logan Pass.

**Reconstruction of Cabins in the Sun Road**  
 We support the Park's preferred alternative A for Post-Tenst Reconstruction. While in the short-term this alternative could have the most dramatic impact on visitors' Park experience, in the long-term it is the most socially responsible alternative. The site-specific environmental analysis should adequately analyze construction activity impacts on wildlife and provide an alternative that will minimize those impacts.

12 **Expansion of Visitor's Center and Visitor Services**  
 There should be no expansion of existing facilities and no new facilities built within the Park. The Park should analyze the economic feasibility of bringing structures up to code and should consider the impact of access route conditions -- most facilities in the URS are cited as having serious health and safety concerns. The Park should also establish a policy for the facility rehabilitation. \$100 million for structure improvements to maintain and strengthen natural resource protection, comfort, and interpretation. Impacts on wildlife, especially grizzly bears, should be adequately analyzed before any facilities are built or to consider or retaining visitor services and historic structures in key habitat and movement corridors.

13 The preferred alternative states that a detailed analysis of lighting would be undertaken to determine the visual quality, location and mix of services appropriate at Glacier. Under the preferred alternative, the Park would also conduct a number of other studies and analyses. The final EIS should outline the policies and conditions for all of these studies -- what is the most immediate question to answer? Visual quality? Funding process? Economic feasibility? The opportunity to reduce the "development footprint" in the Park?

**Secure Air Rights**  
 We support the Park's preferred Alternative A to provide successful siting of air rights over Glacier. The two methods described in the DEIS (p. 60) should be considered, quality and transparency. We appreciate the National Park Service's efforts to work with the Federal Aviation Administration on the problem of commercial aircraft flights over our national parks. Encouraging in particular when the rules and standards that Glacier's transportation office, and any have serious impacts on wildlife. Prohibiting commercial siting of air rights over the Park is a dramatic step in recognizing its wilderness characteristics.

11. The timeframe for evaluating and developing an expanded public transportation system would depend on funding, but it is a high priority, given the future reconstruction of the Going-to-the-Sun Road. The idea of removing the bookstore at Logan Pass is too detailed for a general management plan; it will be considered in a comprehensive use plan for the Going-to-the-Sun Road if funding becomes available to construct a west side discovery center and museum.
12. Further site-specific studies and analysis would be conducted.
13. Please see the section on "Implementation Plans" in volume 1 of this document.

COMMENTS

RESPONSES

**Personal Wilderness**

We wholeheartedly support the Park's proposed alternative A to permanently ban recreational personal wilderness from all visitors to the Park. The 1996 temporary prohibition on personal wilderness in the Park showed great foresight and a permanent ban is an essential element in preserving Glacier's natural state.

**Winter Use**

We support Alternative C - Status Quo, and the Park's ban on snowmobiling. The proposed alternative does not "prepare for more winter day use", it invites more use. The DRES alternatives under "Options to All the Preferred Alternatives" repeatedly refer to "expanded use", "additional use", and "increased winter use". Before "expanding winter use opportunities", encouraging additional winter use, and increasing winter recreation will happen, Glacier Park should conduct a winter use study. It is much easier to set winter use restrictions prior to opening up areas than it is to restrict established areas and facilitate closure of popular areas. The winter use study should include a detailed profile of park visitors and a visitation use trends analysis.

The preferred alternative would have significant impacts on wildlife including bald eagle migration and nesting, porcupine distribution and abundance, wolves, lynx, and grizzly bears. Page 289 of the DRES states that:

- "Increased winter use in the lower elevations of the park would adversely affect wildlife that are active in winter, displacing them from snow cover, tracks, and developed areas."
- "Consistent placement of snow sheds could increase (harm) nesting in the park."
- "Wildlife would be subject to additional human-induced stress during an already vulnerable time in the winter."
- "This alternative [A] would have a greater potential to impact wildlife than the no-winter alternative because human activity would increase during winter when many animals are vulnerable to disturbance."

We see no need for the Park to provide recreational services such as ski rental, food service, and overnight accommodations. These services are currently available outside the Park.

**Divide Creek Wood Harvest**

We appreciate the safety concerns associated with the location of Park Service buildings located within the Divide Creek floodplain and the desire to restore natural processes within the floodplain. While the structures should be relocated outside the floodplain and flood hazard area, we are concerned about where they would be located and the consequent impact on natural values such as wildlife. We support an analysis to determine the physical development necessary for park operations and recommend locating facilities outside Park boundaries.

14

15

14. Please see the responses to the comments of the Montana Wilderness Association. This plan will provide year-round guidance for the management of the park. Subsequent implementation plans such as the Resource Management Plan, and the "Backcountry Management Plan" deal with specific issues such as ways to protect wildlife and with the development of standards, indicators, and a monitoring program.
15. The removal of the Divide Creek facilities would be preceded by a comprehensive site study and NEPA analysis, which would include sites both in and outside of the park.

COMMENTS

RESPONSES

16

**West Side Discovery Center and Museum**

We support Alternative B - Locate the Discovery Center and Museum Outside the Park. We understand the need for a new visitor center, interpretive displays, and the possible elimination of Park administrative visitor services (i.e. backcountry permits), but are concerned about the impacts these facilities and increased traffic we did have on the Park's resources and natural values if they were built within Park boundaries. We believe it best to locate the center in West Glacier. If the opportunity arises, we encourage the Park Service to consider the Alberta Visitor Center in West Glacier and convert it to Glacier's West Side visitor center.

We appreciate the opportunity to comment on the Draft General Management Plan Environmental Impact for the Glacier National Park. We would be happy to discuss our comments with you or your staff.

The Wilderness Society is a non-profit public interest membership organization, dedicated to protecting national networks of wilderness, ensuring the sound management of America's public lands and restoring an American land ethic. Approximately 1,200 of the Society's 223,000 members live in Montana.

Sincerely,

Steve Mickley  
Northern Rockies Region

16. Please see the responses to the comments of the Montana Wilderness Association.

COMMENTS

RESPONSES

11 **WILDERNESS SOCIETY**  
 12 **DR. KEVIN: I'M BOB KEVIN. I'M REGIONAL**  
 13 **Director for the Wilderness Society. We're a 200,000**  
 14 **member organization with eight regional offices. I**  
 15 **represent the Northern Rockies office here in Bozeman.**  
 16 **We're very concerned about the -- and looking**  
 17 **closely at the Glacier Management Plan. We think that**  
 18 **in some cases it might be pre-emptive setting, and also**  
 19 **just for Glacier's sake itself. We applaud your efforts**  
 20 **to stop overflights -- commercial overflights in the**  
 21 **park. We think that that's a really important battle**  
 22 **and we pledge to work with you on that.**  
 23 **My own experience is that when I flew to the**  
 24 **Grand Canyon in the early 1980s we had to stop and**  
 25 **before we would camp in the evening wait and see if we**

Public Hearing - 18

**CHARLES D. WILDER SOCIETY REPORTS, INC.**  
**1000 W. GARDEN AVENUE**  
**BOZEMAN, MONTANA 59717**

Wilderness Society (hearing, Bozeman, Ekey)—0655

Thank you for your comments.

COMMENTS

RESPONSES

1 were on an overflight pattern to see if we wanted to  
 2 camp there. It was so disorienting. One night we went  
 3 to camp and we just got out of our tents and set up camp  
 4 and we were on an overflight pattern. And every 15 or  
 5 20 minutes there would be another flight over us. And I  
 6 spent a lot of time in Glacier Park in camping and  
 7 hiking, and I don't want to have that happen to my  
 8 experiences there.

9 The same goes for jet skis. I think that any  
 10 motorized use, especially jet skis, on Lake McDonald  
 11 should be prohibited. You should maintain that. And,  
 12 again, we'll work with you on that.

13 If you've ever been to a lake with there's a  
 14 jet ski operating, it changes the character of the  
 15 entire lake. We think you did a great job of  
 16 recognizing the six zones as separate management zones  
 17 within the Park. I especially like the rustic  
 18 designation for certain zones. And also we encourage  
 19 you to continue to manage the 90 to 94 percent of the  
 20 Park that is wilderness and manage it as wilderness.  
 21 And we will work with you someday to get Congress to  
 22 designate the rest of it so it will formally be  
 23 designated as wilderness.

24 The consensus on the management plan was that  
 25 it needs to be more of a development plan, or focused on

within Glacier - 18

CHARLES D. BEHRE COURT REPORTER, INC.  
 2000 W. 10TH AVENUE  
 SPOKANE, WYOMING 83401

## COMMENTS

## RESPONSES

1 development and laws on natural resources and how we're  
 2 going to manage these natural resources. It seems to  
 3 address a lot towards on how you're going to accommodate  
 4 your visitors without talking about any kind of carrying  
 5 capacity for the Park and where the limits might be. I  
 6 know you have a dual mandate that is sometimes  
 7 conflicting to preserve the natural resources and then  
 8 provide for the enjoyment of visitors. And we encourage  
 9 you to look at -- in providing enjoyment of visitors on  
 10 a quality basis as well as a quantity basis; that people  
 11 understand that when they go there there's going to be  
 12 plenty of interpretation so they could understand what  
 13 they're seeing, but they're not going to get caught up  
 14 in traffic jams and that they're going to be able to  
 15 park at pull-outs and do some hiking and not  
 16 be -- and experience the park for what it is. And in  
 17 many cases what they are enjoying, a large urban area  
 18 or whatever. So we hope that you can incorporate in the  
 19 final talk about carrying capacity for the Park where  
 20 you are headed with that. You talk about adding a  
 21 visitor's Center and pull-outs on the way of the  
 22 Going-to-the-Sun highway and so forth, and eventually if  
 23 growth continues it is going to be full. Those pull-outs  
 24 will be full. And the Logan Visitor's Center will  
 25 continue to be full.

Public Hearing - 17

COMMENTS

RESPONSES

1           So how are we going to address this in the  
 2 future? Is there a more timely alternative that needs  
 3 to be considered? And keep these issues in the  
 4 dialogue.

5           We also encourage you to keep the pillow count  
 6 the same for the cooperative facilities and not have  
 7 any expansion of the number of accommodations inside the  
 8 park. I think there is plenty of opportunity outside of  
 9 the Park to increase that, if that is what is needed,  
 10 but keep the pillow count the same in the Park.

11           Going-to-the-Sun Road rebuild is going to take  
 12 a lot of money -- about 80 million dollars, as I  
 13 understand. And the Mary Elvander Hotel rebuild would be  
 14 about the same. It is going to be hard to raise that  
 15 kind of money in the current political climate with  
 16 Congress. We'll try and help you when we can, but I  
 17 think you might have to look at alternatives on how you  
 18 can renovate the Mary Elvander Hotel and some of those  
 19 other hotels because it is going to be a real up-hill  
 20 battle to get that from Congress. And it is also  
 21 difficult, as you've seen, to raise it from private  
 22 sources as we've seen with the Chalet.

23           So we'll be filing more detailed comments,  
 24 written comments, so that you can see them. But I just  
 25 wanted to give you a brief overview. Thanks for your  
 time.

Philip Herring - 18

CHARLES D. FISHER CONSULTING, INC.  
 400 West 10th Street  
 Anchorage, Alaska 99501

COMMENTS

RESPONSES

Wildlands Center for Preventing Roads

November 27, 1998

Representative Mittie  
Charles W. Cramer  
Charles W. Cramer  
West Glacier, MT 59936

Representative Mittie,

I am writing to you on behalf of Wildlands Center for Preventing Roads (Wildlands CPR), a non-profit environmental organization working to protect and restore ecosystems by preventing and removing roads and building sustainable alternatives. Wildlands CPR is a national network of individuals and organizations, with members from all over the country who value Glacier National Park. Formerly called the Road Removal Campaign, Project (RAMP) 2000, we have submitted comments to the and in support of this process earlier this year, as well.

We believe that the Road Management Plan (RMP) for Glacier National Park (GNP) has several underlying opportunities for improving park management, in addition to several places where the concept of "leaving it as is" is likely to have such impacts. As stated in the National Park Service Organic Act, the purpose of the park is, "to establish, maintain and protect the park's natural resources and historic integrity." Michigan Wildlife Conservation Chairwoman, Linda W.P. Egan, MSP (D, MI) is. In addition, according to Park regulations, the "primary purpose of the Park is to establish and maintain a natural preserve, and to provide a place for the protection and enjoyment of the park, and for maintaining and expanding scientific visitor use of the park. As done, the increasing visitor activity in the park will result in such impacts. Once all these factors are taken into account, the RMP will be based on the assumption, it will be difficult, if not impossible to manage the success which the park, without any guidance for managing and controlling visitor activities. It will also be difficult to do so without causing, somewhat avoidable, some collecting the same resources of the proposed management plan. Under the National Park Service Organic Act also allows the "providing enjoyment" of park scenery, providing these opportunities must be in a way of providing the very resources that are supposed to be protected within the park.

Like this issue, and the timing of the comment period, we support the Road Management Plan as a way to ensure compliance and better approach to managing Glacier National Park by the process of the park.

Below are possible changes you

1. Change from Wilderness Management
2. Change from of Glacier National Park
3. Change from the Road Removal Campaign
4. Remove All Roads
5. Encourage Wilderness
6. Remove All

1. Change from Wilderness Management

An ability noted in the Road Management Plan (RMP) for Glacier National Park has been and will continue to manage more than 90% of the Park to wilderness in accordance with the Park's 1909 Organic Act and subsequent legislation. Therefore, we believe it is important that the environmental management system is carefully planned to the benefit of the park. Alternative A, however, it would manage 90% of the park as wilderness. The "management" of the management plan would have a greater effect on what resources are available to the park, and the management plan would be a "wild area" (WPA). This area would be identified by the management plan for the other alternatives. It is not surprising that this is not a change from the current management plan, which you see

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Wildlands Center for Preventing Roads

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Wildlands Center for Preventing Roads—1158

1. Please see the responses to the National Parks and Conservation Association, the Montana Wilderness Association, the Coalition for Canyon Preservation, the Wilderness Society, and Friends of the West.
2. Please see the changed text in the "Environmental Consequences" section.

1

2





COMMENTS

RESPONSES

particularly problematic because they are, by and large, the ground. We hope your proposal to the Federal Aviation Administration is both bold and clear and that you emphasize not only the overall impact of the flight but the individual impacts from different types of flights over an airport, including take, taxi and engine.

We also agree with your comment that the Chicago-to-the-area cost of the associated noise for all types of flights into the vicinity of the park, making it necessary to have curfews.

**5. Personal, Recreational, and Commercial:**

Private and other personal recreational transportation are only less likely dangerous, but they cause significant noise pollution and also change in noise type patterns over noise duration periods as well as significant aircraft noise impact to specific vehicles. In addition, the noise from these vehicles can be detrimental to wildlife and is acutely uncomfortable to many park visitors. We strongly support your position for a governmental ban on personal recreational aircraft, in order to maintain the overall value of the park, for its outdoor recreational and specific wildlife and its human visitors.

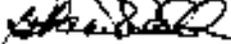
**A. Visual Line**

We do not support your proposal to increase landing and parking facilities at the park in the vicinity. As you state, where are the gates located. The proposal to increase parking and possibly other air traffic and access to study to encourage increased visitation, which also means aircraft operations. While in the recent critical time for many vehicles operated in the park, particularly airplanes, noise increased visitation likely to increase visitor activity as well as air traffic activity systems in a park, consistent with business. We support current management of the park under the very best of conditions, development or maintenance for additional parking and access.

We do, however, support your proposal, but, as mentioned in vehicle curfews.

We appreciate your consideration of our comments. Please feel free to call us at 408/253-2228 if you have any questions.

**Respectfully,**



**Richard White**  
Director

COMMENTS

RESPONSES

0266



**Yeager Enterprises Motel, LLC**

1000 CHERRY ROAD OF BELLVILLE, MISSISSIPPI

2020 OLD NORTH ROAD #20 - HAZARDSPRINGS, MISSISSIPPI 39238-4401 • 662-840-4401 • 1706-0718 840-4400

September 28, 1998

Superintendent  
Chattahoochee National Park  
Wash. Blount, Mississ. 39256

Dear Superintendent:

Subject: Going To The Sun Highway

We both know that Glacier Park is a great place and one challenge is the future.

I drive through Glacier just about every year, and for the years that I have not, I drive up the to the point I do. I have five in a small town just outside of Louisville, Kentucky. I grew up in Clinton, Missouri and come back for visits often. I very seldom come to Missouri that I do not go to Glacier Park. My wife prefers to drive highway 2 and stop at Hites and the gas tank. I prefer the Going-to-the-Sun road. I like to stay in the park and also stay at Lake McDonald Inn.

As much as I like to drive over the Going-to-the-Sun road, I am dismayed after every drive. The road is better in ways than it was 30 years ago but, as we all know is in need of repair. I do not like to see all the semitrailers stopped with their cabs running and polluting. To me, Glacier park is for people and outdoors, not cars. I would like to see new toll roads built on the roadway for a money-ear money. Think the same as in Redwoodlands. The tolls would run on every hour a day as needed and people would get on and off as desired. All people would be toll and enjoy without have the worry of driving and waiting.

Thank you for your time. A suggestion only. Glacier Park - a great place.

Sincerely,

*L. Ray Yeager*  
L. Ray Yeager



Yeager Enterprises Motel—0266

1. A rail system was discussed and rejected because the Going-to-the-Sun Road was designed for automotive use and is a historic landmark protected under the National Historic Preservation Act of 1966 (section 106). However, the preferred alternative includes the provision of an efficient transportation system.

COMMENTS

RESPONSES

0996

Kurtis Lee, 4000 N. Highway 225, Box 10000-000, Yellowstone, ID 83400  
309-726-8800

November 29, 2004

Superintendent,  
CHAMPION Project  
Glenzer National Park  
Wild Officer, MT 20400

Dear Sir,

I am writing to have my comments considered in the development of the forthcoming General Management Plan for Glenzer National Park. I would like to specifically address the issue of commercial sightseeing air tours over the park.

The preferred alternative listed by the CHAMPION is an commercial sightseeing route. Currently, under Federal Aviation Special Regulations (FAR), only one National Park in the United States (Rocky Mountain National Park, CO) has a specific law for commercial air tours. This was recently legislated, and is being vigorously executed by various aviation groups and legislators in this town. At this time it is highly likely that this FAR will not be adopted as a final F.A.A. regulation.

1

I request that Glenzer National Park obtain completely stop attempting to influence the regulation of airplanes in the United States. The Department of the Interior has no right to affect which group of airplanes over Montana will operate or, worse through that group which by current F.A.A. regulations, and then request that the F.A.A. retroactively legislate against that group only in the airspace above a particular National Park. The apparent purpose of this letter to Rocky Mountain National Park is greatly realized, and only in the United States National Park of the same White House, because general aviation. If the officials of Glenzer National Park find that current F.A.A. Regulations for commercial air tours (FAR pt. 125 and pt. 127) are inadequate in protecting the wildlife, visitors and general wilderness of the park then under wilderness, then please formally notify the F.A.A. of this but I also insist that QJNR officials do not attempt to initiate, enforce, influence or implement specific F.A.A. regulations for the airspace above Glenzer National Park. Such an effort would be an obvious conflict of interest.

Any aircraft or tour operator who tries to establish and ultimately violate F.A.A. regulations in flight will be violated by the F.A.A. in due time. Tour operators simply do not live in this business. As a tourist and air tour operator, I go to every length possible to minimize my airplane's negative impact on wildlife and people, and as someone who is a wilderness enthusiast. This involves flying at altitudes far above the ceilings obtained by law, even while lowering some wilderness exposure in doing so. It is worth every penny to me. I also am a wilderness area who always carry very low and efficient flying. I think QJNR officials will find an extraordinary willingness amongst commercial air tour operators in the area to voluntarily work-out a system of air tour routes and altitudes, and abide by them.

Therefore, I request that Glenzer National Park consider only Alternative "C", Status Quo, as priority for its upcoming General Management Plan regarding commercial air tours over the park.

Sincerely,  
  
Kurtis E. Kelling

Z Air Inc.— 0996

- 1. Please see the responses to the comments of the United States Air Tour Association and the Montana Pilots' Association.