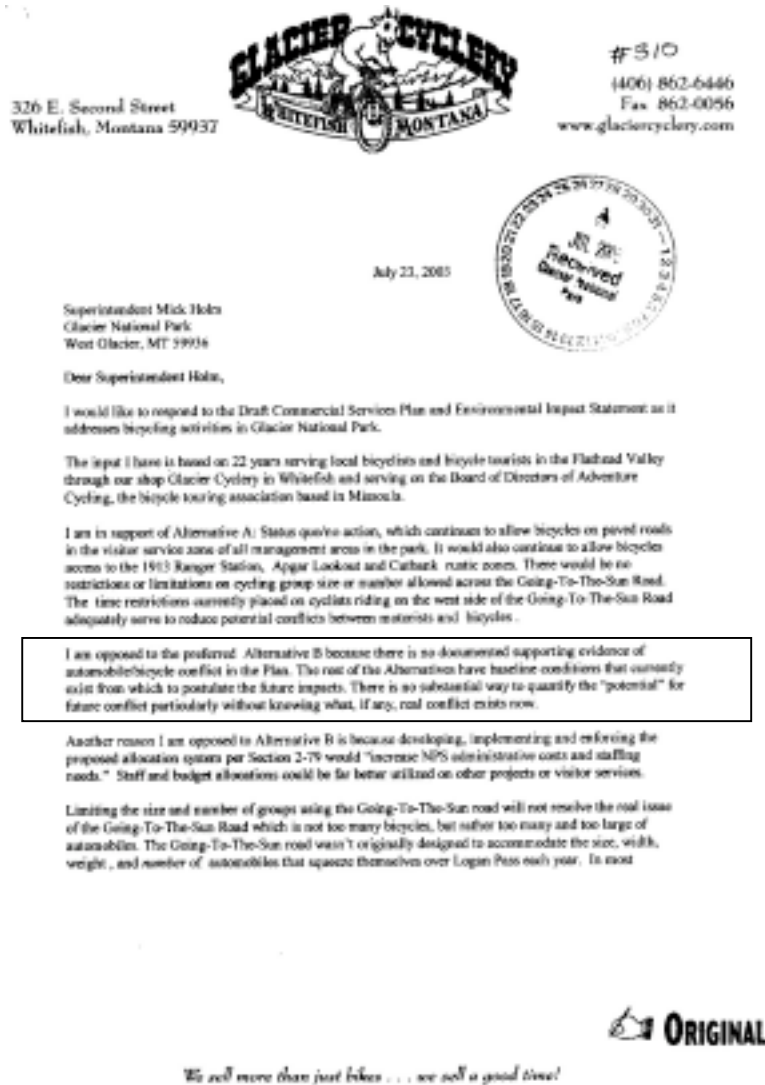


Comment

Response



Comment #310 (Glacier Cyclery)

1. The commercial services plan addresses only commercially guided bicycle tours, not private bicyclists. The National Park Service has received many comments over the years expressing concerns about motorized vehicles and bicycles sharing the Going-to-the Sun Road, especially the narrow winding sections. It is difficult for cars to pass long lines of bicycles safely on many of the sections of the road. Cyclists are required to ride single file and in groups of no more than three, but this has been difficult to enforce. While the National Park Service does not plan to limit the availability of bicycle tours to visitors, setting a group size limit and a limit on the number of bike tour groups per day would begin to reduce congestion and address safety concerns for bicyclists and motorized vehicles. The visitor experience would be improved on the Going-to-the Sun Road.

Response

Comment

respects bicycles. FdHE or accomplish the Draft Commercial Services Plan's definitions of services that are "necessary" and "appropriate" better than automobiles, and bicycles have the added benefit over vehicles of a minimal amount of impact to the environment. Looking at limiting automobile activity over The Sun road in the future makes more sense.

Thank you.

Sincerely,

 Joe Brunk

Comment

Response



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY #313
REGION 8, MONTANA OFFICE
FEDERAL BUILDING, 10 West 15th Street, Suite 3206
HELENA, MONTANA 59638

Ref: 8MO

July 23, 2003

Mr. Michael O. Holm, Superintendent
Project Management Office
Glacier National Park
West Glacier, Montana 59936



Re: Draft Commercial Services Plan and Draft
EIS

Dear Mr. Holm:

The Environmental Protection Agency (EPA) Region VIII Montana Office has reviewed the Draft Environmental Impact Statement (DEIS) for the Draft Commercial Services Plan for Glacier National Park. The EPA reviews EISs in accordance with its responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309 of the Clean Air Act directs EPA to review and comment in writing on the environmental impacts of any major Federal agency action. The EPA's comments include a rating of both the environmental impact of the proposed action and the adequacy of the NEPA document.

The EPA supports Glacier National Park's guiding philosophy to manage most of the Park for its wild character and integrity of its unique natural heritage. We particularly support the Commercial Services Plan proposal to limit guided hiking group size and number of trips in backcountry areas to reduce impacts in pristine and primitive areas, and support limitations on growth and development of visitor services to maintain the wild character and pristine natural environment of Glacier National Park. We do not object to proposals for necessary and appropriate commercial services for park visitors, although we do have a few comments and questions regarding the plan.

1 It is important that proposed construction activities, including new employee housing and parking lots, near waterbodies employ adequate BMPs and sediment and erosion control measures to protect water quality and beneficial uses of surface waters. Waters within Glacier National Park are considered "Outstanding Resource Waters" under Montana's Water Quality Standards for which no degradation is generally allowed. Montana's Nondegradation Rules, however, do allow impacts to Outstanding Resource Waters from nonpoint sources of pollution if reasonable land, soil, and water conservation practices are used and beneficial uses of surface waters are protected.



Comment #313 (EPA)

- Any new construction in the park would employ "Best Management Practices," including sediment and erosion control measures. These measures would be specified in construction documents, and on-site monitoring would be conducted to ensure compliance. The National Park Service would obtain the appropriate permits for storm water discharge and turbidity exemptions where applicable.

Comment

Response

1

It is important that appropriate storm water discharge permits and any applicable turbidity exemption authorizations be obtained from the Montana Dept. of Environmental Quality prior to implementation of proposed construction work affecting surface waters (contact John Herrin of MDEQ in Helena at 444-3927 and Jeff Ryan at 444-4626, respectively).

2

We are concerned about proposals to "maintain natural stream channels for flood control purposes" in Appistoki, Snyder and Rose Creeks. Efforts to "maintain natural stream channels" has potential to cause damage to aquatic habitat. Discharges of fill material into streams, wetlands and other waters of the United States are regulated by 404 permits. Construction work in the stream channel or stream channel maintenance activities should be evaluated under Clean Water Act, Section 404 Dredge and Fill permits from the U.S. Army Corps of Engineers. We recommend that the National Park Service contact the U.S. Army Corps of Engineers to assure that the proper 404 permits necessary for channel maintenance or construction work in or near waters of the U.S. are obtained prior to carrying out such work (Contact Mr. Allan Strickle of the Corps of Engineers Office in Helena at 406-441-1375). We also encourage evaluation of options to move buildings, structures and other developments out of floodplains to the maximum extent possible to avoid the need for "channel maintenance work" that constrains free flowing stream channels, and has potential to destabilize stream channels.

3

The EPA's more detailed questions, concerns, and/or comments regarding the analysis, documentation, or potential environmental impacts of the draft Commercial Services Plan DEIS are included in the enclosure with this letter. Based on the procedures EPA uses to evaluate the adequacy of the information and the potential environmental impacts of the proposed action and alternatives in an EIS, the draft Commercial Services Plan DEIS has been rated as Category EC-2 (Environmental Concerns-Insufficient Information). A copy of EPA's rating criteria is attached.

The EPA has environmental concerns about potential impacts to outstanding resource waters within Glacier National Park associated with proposed stream channel maintenance activities and construction. The EPA believes additional information should be presented to fully assess and mitigate all potential impacts of the management actions.

The EPA appreciates the effort that went into the preparation of this DEIS, and we thank you for the opportunity for review and comment. If we may provide further explanation of our concerns please contact Mr. Steve Potts of my staff in Helena at (406) 457-5022 or in Missoula at (406) 329-3313.

Sincerely,


John F. Wardell
Director
Montana Office

2. The present channel of Appistoki Creek, which is located in the Two Medicine area, would be maintained by man-made berms along the sides of the creek to control flooding and erosion, under both alternatives. At Snyder Creek, we would remove debris from the channel but no stream manipulation would occur. At Rose Creek, we have removed the action of armoring the bank. The alternative descriptions have been modified to address this issue.

The National Park Service would obtain the necessary permits prior to working within the streams. At this time, structures would not be removed from the Rising Sun area; an evacuation plan is in place and would be updated to protect visitors and employees from flooding dangers. The reason we are not proposing to move all facilities from the floodplain is that many of these facilities are national historical landmarks, national register properties or national historic districts and have been maintained since 1910. Furthermore, the topography and landscape constraints limit alternate locations for facilities. The alternatives reflect an effort to keep development within the developed areas to minimize resource impacts. However, the preferred alternative does not remove housing facilities from the floodplain at Rising Sun and Lake McDonald. We will contact the U.S. Army Corps of Engineers and the state of Montana prior to working within the high water line of any streams in the park.

Response	Comment
	<p>Enclosure</p> <p>cc: Cynthia Cody/Julia Johnson, EPA, 8EPR-N, Denver</p>

**U.S. Environmental Protection Agency Rating System for Draft Environmental Impact Statements
Definitions and Follow-Up Action***

Environmental Impact of the Action

EO -- Lack of Objections: The Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes in the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC -- Environmental Concerns: The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

ED -- Environmental Objections: The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU -- Environmentally Unsatisfactory: The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 -- Adequate: EPA believes the draft EIS adequately sets forth the environmental impacts of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 -- Insufficient Information: The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 -- Inadequate: EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and its Section 106 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment, February, 1987.

EPA Comments on the Glacier National Park Draft Commercial Services Plan (CSP) and Draft EIS

Brief Project Overview:

Glacier National Park prepared this draft CSP and draft EIS to evaluate the level and types commercial visitor services to offer in Glacier National Park based on the 1999 General Management Plan and EIS. The CSP and DEIS present alternatives for commercial services (e.g., hiking, underwater diving, boat and motor vehicle tours, biking, etc.,) and site and facility improvements in the developed areas of the Park (i.e., Apgar, Two Medicine, Lake McDonald, Rising Sun, Many Glacier, and Swiftcurrent). The draft CSP and EIS describe the vision for commercial services in Glacier National Park and determine the level and types of commercial visitor services that would be appropriate and necessary in the park for the foreseeable future. The goals of the Draft CSP and EIS are to:

- Determine the appropriate overall mix of necessary and appropriate commercial services.
- Establish the framework for future decisions.
- Establish the character and level of service by park area based on need, expectation, economic feasibility, and resource implications.
- Provide a clear vision and strategy for rehabilitating the historic hotels.
- Continue a wide range of related visitor experiences.
- Provide the specific information necessary for the issuance of concession contracts.

Alternative A, the status quo or no action alternative, addresses those improvements needed to correct life safety and health issues in the absence of a long range plan. Alternative B, (Preferred) would accommodate all services provided in Alternative A, and provide additional and/or improved services. Alternative C would in general provide additional and improved services over those proposed in Alternative B. The distinctions between alternatives vary based upon specific recommendations for the individual developed areas and the services offered.

The proposed changes include additional employee housing at Many Glacier, rearranging guest lodging and employee housing at Lake McDonald and Rising Sun, and completing historic cabin loops at Swiftcurrent Motel. At Many Glacier, new housing for concessions employees is proposed near the larger parking lot above the hotel. The expansion would increase separation between visitors and employees, who are currently housed in the hotel or directly adjacent to it. The plan also proposes direction for the Granite Park Chalet, preferring that it continue to be run as a limited service "hikers hut," contrary to the park's previous position that it be operated as a full-service chalet that serves meals. Granite Park Chalet, located on the Highline Trail, was a full-service operation when it was closed in the early 1990s because of sewage-disposal problems. It was reopened as a hikers hut with some occupancy restrictions and minimal services. Other changes considered in the EIS include allowing guides to accompany visitors in their cars, setting party size limits on guided hikes and bicycle tours, and allowing new services including guided underwater diving and motorcycle tours.

Comments:

1) The EPA supports Glacier National Park's guiding philosophy to manage most of the Park for its wild character and integrity of its unique natural heritage. We support the Commercial Services Plan proposal to limit guided hiking group size and number of trips in backcountry areas to reduce impacts in pristine and primitive areas (page 2-6), and in general support limitations on growth and development of visitor services to maintain the wild character and pristine natural environment of Glacier National Park. We do not object to proposals for necessary and appropriate commercial services to improve the visitor experience for park visitors, although we do have a few comments and questions as discussed in the comments below.

2) Proposed construction activities, including new employee housing and parking lots, near waterbodies must employ adequate BMPs and sediment and erosion control measures to protect water quality and beneficial uses of surface waters (page 4-12). Waters within Glacier National Park are considered "Outstanding Resource Waters" (ARM 17.30.702(18)) under Montana's Water Quality Standards for which no degradation is generally allowed. Montana's Nondegradation Rules (ARM 17.30, Sub-Chapter 7) however, do allow impacts to Outstanding Resource Waters from nonpoint sources of pollution if reasonable land, soil, and water conservation practices (ARM 17.30.602(23)) are used and beneficial uses of surface waters are protected.

It is also important that appropriate storm water discharge permits and any applicable turbidity exemption authorizations (i.e., 318 authorization) be obtained from the Montana Dept. of Environmental Quality prior to implementation of construction work affecting surface waters (contact John Harris of MDEQ in Helena at 444-3927 and Jeff Ryan at 444-4626, respectively).

3) We note that an element in the preferred alternative for the Rising Sun developed area is to "maintain the present channel of Appistoki Creek to protect the developed area from flooding" (page 2-49). The Statement of Findings near the end of the DEIS also implies that Snyder Creek and Rose Creek would be "maintained as necessary" (page 13 of Statement of Findings). The Snyder Creek and Rose Creek stream channel "maintenance" activities are not clearly identified in the Chapter 2 discussion of alternatives. If channel maintenance activities are proposed in Snyder Creek and Rose Creek they should be identified in the Chapter 2 discussion of alternatives to assure consistency and clarity of disclosure.

We note that efforts to "maintain natural stream channels for flood control purposes" can cause damage to aquatic habitat. Discharges of fill material into streams, wetlands and other waters of the United States are regulated by 404 permits. Construction work in the stream channel or stream channel maintenance activities should be evaluated under Clean Water Act, 33 U.S.C. 1344, Section 404 Dredge and Fill permits from the U.S. Army

4. Please see the responses to #1 and #2 above.

5. Appistoki Creek is in Two Medicine. We have corrected the text in the alternative descriptions to include these actions. Necessary permits will be obtained prior to any work. We considered moving structures out of the floodplain at Rising Sun. However, because the structures are historic, we instead moved the overnight use out of the floodplain.

Comment

Response

- 5 Corps of Engineers. We recommend that the National Park Service contact the U.S. Army Corps of Engineers to assure that the proper 404 permits necessary for channel maintenance or construction work in or near waters of the U.S. are obtained prior to carrying out such work (Contact Mr. Allan Steisle of the Corps of Engineers Office in Helena at 406-441-1335).
- We also encourage evaluation of options to move buildings, structures and other developments out of floodplains to the maximum extent possible to avoid the need for "channel maintenance work" that constrains free flowing stream channels, and that may further destabilize stream channels. We realize, however, that some of the buildings and developments in Glacier Park floodplains may not be relocated due to their historic and cultural values. We support removal of the Johnson, Jammer, Hydro and Boys I And II dormitories located in the Soyler Creek floodplain in the Lake McDonald developed area, and encourage consideration of removal of other structures located in the floodplain if at all possible (pages 2-25, 2-31). We also we encourage consideration of removal of structures in the floodplain at the Rising Sun developed area, and locating replacement housing and guest accommodations outside the floodplain if at all possible (page 2-41).
- 6 4) It is not clear in the DEIS how increased volumes of sanitary wastewater would be treated and handled with the Alternative B proposal to provide potable water and improved toilet facilities at Granite Park Chalet (page 2-5). Treatment, handling and disposal of sanitary wastewater in Alternative C that proposes full service facilities at Granite Park Chalet and increased employee and visitor use at the other developed areas that would significantly increase wastewater loads and treatment needs is also not clear.
- 5) We are pleased that all proposed actions would avoid wetland areas, so that wetlands would not be affected (page 4-8), and that proposed actions would not have additional impacts upon wild and scenic portions of the North and Middle Forks of the Flathead River.
- 6) We are pleased that the project would not have health or environmental effects on minorities or low income populations or communities (page 4-8).
- 7 7) We note that the DEIS indicates that improvement of visitor facilities and in some cases extending the operating season may increase visitor use in some areas including riparian and shoreline areas that could result in compaction of soils and trampling of emerging and vulnerable vegetation (page 4-41, 4-49). We encourage consideration of additional restrictions or limitations on visitor use near the developed areas or mitigation measures such as construction of walkways as needed to avoid excessive visitor trampling on and compaction of saturated soils and emerging and vulnerable vegetation. We note that some highly valued and sensitive plant communities, alpine (tundra) and subalpine (mountain) meadow plant communities may be easily damaged and slow to recover. Disturbances to sensitive or fragile areas should be avoided if at all possible.

6. Because Granite Park Chalet is particularly complex and has not been designed, we are not able to analyze the impacts at this time. The purpose of raising a discussion of the chalet in the commercial services plan was to evaluate a different direction than the park had previously specified in the 1993 Findings of No Significant Impact. A NEPA document will be completed during design and will be based on a decision from this Environmental Impact Statement process.
7. We agree that disturbance to vegetation communities, especially fragile alpine communities, should be avoided. The National Park Service would make every effort to protect vegetation resources during construction activities and throughout the visitor season. The need for measures such as walkways to minimize trampling and compaction in specific areas would be addressed during the design stage of specific projects. Some measures have also been added to the Mitigation Section to address these concerns.

Comment

Response

8

8) We are concerned about potential adverse impacts to wildlife and wildlife habitat identified in the DEIS including: permanent modification or loss of habitat including adverse edge effects; habitat fragmentation and loss of connectivity; loss of habitat complexity; harassment and disturbance resulting in displacement and avoidance behavior and disruption of wildlife movement; vulnerability to poaching and illegal collection; increased potential for chronic negative interactions with humans and human induced physiological stress, potentially causing lowered success in reproduction and rearing of young; direct mortality from vehicles; and spread of non-native species and degradation of rare and unique communities (page 4-54). We encourage development of mitigation measures to reduce potential adverse impacts to wildlife and wildlife habitat as much as possible.

9

9) Glacier National Park is designated a Class I air quality area which is the most stringent air quality classification that allows only the smallest incremental growth and accommodates only a small degree of air quality deterioration. The Clean Air Act requires that all new and modified stationary sources of air pollution obtain a Prevention of Significant Deterioration (PSD) permit. We recommend that Glacier National Park staff contact the Montana Dept. of Environmental Quality (MDEQ) to assure that any air pollutant emissions that may be associated with carrying out proposed construction activities are properly permitted (contact Dave Klump in Helena at 406-444-0286) and in compliance with PSD increment allowances to maintain National Ambient Air Quality Standards (NAAQS). Any air pollutant emissions that may affect the adjacent Blackfoot Indian Reservation should be coordinated with Betty Wahl of the EPA Montana Office (406-457-5013).

We are pleased that the DEIS indicates that there would be no impairment of air quality as a result of implementation of any of the alternatives, and no long-term cumulative impacts would be expected as a result of implementation of any of the alternatives. We support the use of guided motor vehicle tours and public transportation to reduce the number of vehicles on park roads, and proposed fueling of red buses with propane to reduce emissions (page 4-91).

8. In addition to the standard park regulations that are designed to protect wildlife, mitigation measures to minimize impacts to wildlife and habitat during proposed construction were included on page 2-74 of the *Draft CSP and Draft EIS*. The *Final Commercial Services Plan and Final Environmental Impact Statement* contains a few additions to those described in the *Draft CSP and Draft EIS*.
9. The Montana Department of Environmental Quality would be consulted to assure that any air pollutant emissions during construction are properly permitted. Thank you for the current names and phone numbers.

Comment #318 (Johnson's of St. Mary)

1. The slight increase of at most 28 guest rooms across the park would be the result of: the adaptive use of existing historic structures; the attempt to provide a type of accommodation not currently provided (i.e., hostels); replacement of units lost by removing them from floodplain areas; or separation of employee and guest functions to make the individual sites work better. A cap of 540 units would be the maximum number of guest rooms allowed under this plan. Although policy in the past has been to encourage the private sector to provide these services outside the park, the 1999 General Management Plan takes into consideration that as the historic facilities are rehabilitated, new or replacement development and increases in use could occur. The General Management Plan further states that a maximum room count will be established in the commercial services plan. Since this modest room count increase would be dispersed across the park, the National Park Service believes it would not have a significant effect on outside businesses. There are also the positive impacts to consider such as Glacier Park Inc.'s national advertising and the state of Montana's advertising campaigns (funded by increased room tax revenue) that draw visitors to the area.

#318

FROM : Johnson's of St. Mary FAX NO. : 4067328817 Jul. 26 2003 03:18PM PL 1

Johnson's of St. Mary
H.C. 72-10 St. Mary Route
St. Mary, MT 59417
Phone (406) 732-5565

Lester R. Johnson
Ruth K. Johnson

July 28, 2003

Dear Sir;

My family has owned and operated a small cafe and campground in St. Mary for 63 years. Each year we strive to make improvements and expand our establishment to better serve our customers.

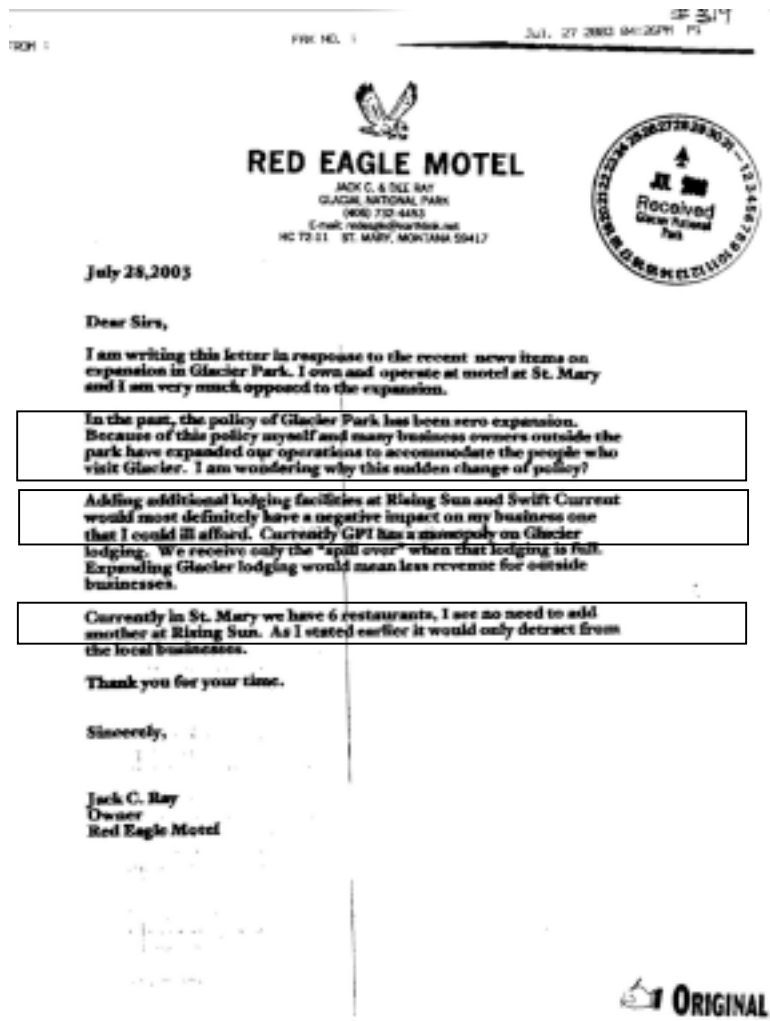
As you know the Blackfeet Reservation is economically depressed, and as year-round residents and business owners we help support our community. Unlike businesses in the park we do not "pack up" and leave once the season is over. Expanding park operations would most certainly take away from the amount of revenue I would see at the end of the season.

1 I feel that expanding services inside the park would be a detriment to not only my family business but the Blackfeet Reservation. In addition Glacier Park is a pristine park. Adding more businesses, traffic and people to such a fragile area would definitely have an impact on the environment. Please reconsider your plan for expansion.

Thank you very much for your time and attention in this matter.

Sincerely,
Kristin Johnson St. Goddard
Manager
Johnson's of St. Mary

ORIGINAL

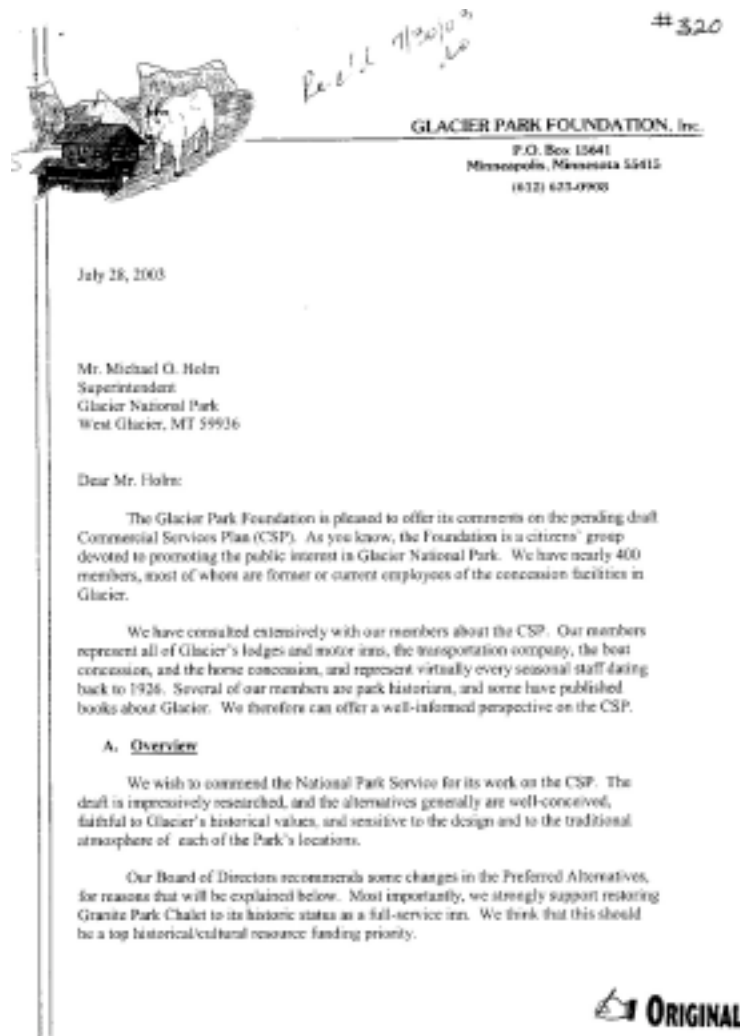


Comment #319 (Red Eagle Motel)

1. See comment #318, response #1.
2. There would be actually no net increase in the total number of guest rooms proposed for the combined the Rising Sun and Swiftcurrent sites in the preferred alternatives, and there could actually be a slight decrease in total room count between these two locations after completion of the design phase.

The number of additional guest rooms proposed at Rising Sun (3-8) is not large enough to impact local businesses. As well, combined with additional rooms proposed at other developed areas of the park, we would only increase the number of rooms parkwide by 28. The preferred alternative for Swiftcurrent would reduce the current number of rooms by eight.

3. We have only proposed a slight expansion of the existing restaurant, not a new one.



Comment #320 (Glacier Park Foundation)

Thank you for your careful review and analysis of the draft commercial services plan.

Comment

Response

<p>1</p> <p>The other main changes which we recommend in the Preferred Alternatives are these:</p> <ul style="list-style-type: none"> we believe that motels should remain available at Swiftcurrent as a less rustic option for middle-class travelers, we would concentrate employee housing in the south end rather than the north end of the Lake McDonald compound, we believe that the CSP should provide for a separately-bid red bus transport contract, focused on service over Going-to-the-Sun Road, and we believe that the Lower Dormitory at Many Glacier should not be converted to guest use unless it is clear that the hotel compound can accommodate the increased traffic and that employee housing can be provided on-site. <p>2</p> <p>Our recommendations embody a number of general principles that we think should be incorporated in the terms of the Plan. These principles should supplement the excellent "Vision for Commercial Services" set out in the draft CSP:</p> <ul style="list-style-type: none"> The CSP should incorporate options for new construction which maximize public ownership of park facilities and avoid increasing private possessory interest. The CSP should seek to utilize concession employees as a resource, where appropriate, to assist with interpretation. The CSP should seek to house employees at the locations where they work, to build community spirit and avoid logistical problems. <p>Again, we wish to stress our approval of most points in the draft CSP. On many issues, we support the Preferred Alternative and offer additional comments or refinements which we hope will strengthen the Plan. Thanks for reviewing the following comments.</p> <p>B. Interaction of Visitors and Employees</p> <p>We support the general principle of visitor/employee separation, as applied to housing, recreation, and parking areas. The CSP's concern with minimizing noise annoyances for guests and competition for space is reasonable and important.</p> <p>However, we wish to emphasize a counterpoint. Concession employees can enhance the experience of visitors as sources of information and hospitality in tradition-rich facilities. The CSP should therefore promote the constructive interaction of visitors and employees as a key value. We urge these specific points for consideration in the CSP:</p> <p>3</p> <ul style="list-style-type: none"> Concession employees should receive written and oral training to assist them in helping to interpret the park experience for visitors. This training should focus on historical and natural features of the specific location in which employees work. A good model (if simplified) would be the Drivers' Manuals traditionally published by the Glacier Park Transport Company. 	<p>1. Regarding motels at Swiftcurrent, please see the response to #13 below. Regarding employee housing at Lake McDonald, please see the response to #11 below. Regarding the red bus contract, please see the response to #11 below. Regarding the Lower Dorm at Many Glacier, please see the response to #6 below.</p> <p>2. The decision to seek and the ability to obtain funding for a government buy-out of the concessioner's possessory interest is outside the scope of this planning effort. To accomplish the goals of the plan, any construction costs would be shared by the concessioner and the National Park Service. Regarding interpretation by concessioners, please see the response to #3 below. As we developed the commercial services plan, we strove as much as possible to provide on-site employee housing. We considered options to house employees outside the park, but it was determined to be infeasible. The concessioners have also communicated to the National Park Service that the workforce is changing in the industry. Many college-age students cannot work early and late in the season, requiring the hiring of older individuals who have families and spouses, and are not suited to a dormitory-style environment.</p> <p>3. We do provide orientation and interpretive training for concession employees using a variety of media, including the <i>Ambassador Program</i>, park newsletters, and general and advanced orientation sessions. We work with the concessioners to provide specialized training covering natural and cultural history of the park as well as safety.</p>
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Comment

Response

- The tradition of employee musical and dramatic entertainment should be encouraged. Such programs have been long-standing in Glacier, and are an effective means of conveying historical information on the lodges.
- A sense of community should be encouraged among the staff of each facility. Where possible, employee housing should be provided on-site. Concentrations should be encouraged to retire significant numbers of employees, in order to enhance the sense of community and of historical continuity at each location.

C. Granite Park Chalet

In 1993, after very extensive study, the Park Service decided that it would seek to reopen Granite Park and Sperry Chalets in their traditional full-service format. Sperry Chalet was reopened successfully, while Granite Park has been operated as a hikers' hostel. The understanding has been that Granite would be restored to its historic format when money became available to renovate its waste and water systems.

4

The 1993 decision was preserved in the subsequent General Management Plan (GMP). We urge review of the public comments on Granite Park which were received in formulating the GMP.

The Preferred Alternative changes the 1993 decision, and proposes that Granite remain a hikers' shelter. The rationale stated in the CSP is "fewer environmental impacts ... a range of opportunities for the public to experience the chalets ... and the interest shown by the public in reconsidering this option."

We strongly urge the Park Service to reinstate the 1993 decision. Our reasons are as follows:

- **National Historic Landmark Status.** Granite Park's historic significance arises in large part from its unusual character as a backcountry inn. Had the building always been a shelter, it is most unlikely that it would have been declared a National Landmark. The Landmark status reflects the sheer color and unexpectedness of encountering hospitality and entertainment, hot meals and baked goods, and beds with clean sheets miles from the nearest road. A permanent shelter format destroys important values of "living history."
- **Guest Demographics and Accessibility.** The chalets provide an opportunity for visitors who are not backpackers to spend a night in the backcountry. This is especially true of Granite Park, as opposed to Sperry, since the relatively level Highline Trail makes Granite Park much more accessible. One of our members writes: "I hiked into Granite Park with four generations of my family. The youngest in our party was 10, and the

3

4. The 1993 Environmental Assessment analyzed the impacts of proposed improvements at the chalets based on current knowledge of what was needed. During the rehabilitation of Sperry Chalet, it became evident that the level of land disturbance, needed material and number of helicopter trips to the wilderness area were grossly underestimated in the Environmental Assessment. For example, it was estimated that a total of 10 hours of helicopter flights were needed for each chalet. By the time the Sperry rehabilitation was completed in 1999, over 170 hours of helicopter time, or 600+ flights, had been made. It also became clear that developing technology and the lessons learned from the Sperry rehabilitation necessitated a change in plans for the composting toilets at Granite Park.

The total costs to complete the work analyzed in the 1993 EA were also greatly underestimated. The rehabilitation of Sperry Chalet and return to full service operation has cost to date \$4.5 million.

The issue of the appropriate level of service at Granite Park Chalet was considered to be outside the scope of the 1999 *General Management Plan* and was not revisited there. However, during scoping for this plan, members of the public asked that the issue be considered again because the park had new information gained from the several years of experience operating the chalet as a hiker shelter. In addition, most of the rehabilitation at Sperry Chalet had been completed and the park also had information from that project to consider.

The 1993 Environmental Assessment is now over 10 years old. Much of the information is dated or now known to be inaccurate. Costs have continued to rise, and revised estimates for the necessary improvements to the gray water system, water system and toilet facilities were included in the *Draft Commercial Services Plan and Draft Environmental Impact Statement*. See other comments that respond to this issue.

Comment

Response

oldster was my grandmother, who was 75. Only a full-service chalet can offer this kind of experience to such a broad spectrum of visitors."

- **Chalet Rates.** We support hostel formats insofar as they provide a low-cost option for students and less affluent travelers (see Section "I," below). At Granite Park, however, staffing and maintenance requirements drive the cost of the hostel format very high. The Granite Park rate is almost \$70 per night (as compared to \$45 per night for cabins with towels, linens, and potable water at other locations). The present format, thus, serves much the same affluent socio-economic class that the full-service format would, but narrows that class to those who are strong and fit enough to carry packs.
- **Utility Upgrade Requirements and Environmental Impacts.** Granite Park will require extensive utility upgrades (potable water, toilets, greywater) under either the Preferred Alternative or the full-service Alternative C. It does not appear to us that the difference in cost between these options is great enough to outweigh historical values. The draft Environmental Impact Statement also notes repeatedly that environmental impacts of the full-services format would be only "slightly" greater than those of the Preferred Alternative (pgs 4-25, 4-37, 4-54, 4-66). The present format has its own negative environmental impacts, since eating and food preparation activities that formerly were focused at the chalet are now dispersed through widespread picnicking.

In sum, we believe that the balance of values supports the 1993 decision to restore full services at Granite Park. We recognize counterarguments, and some of our members support the shelter format. We commend Glacier Wilderness Guides for having run the shelter format well. However, our strong consensus is that Granite Park's historic identity as an inn should be restored. In the meantime, we think that first dollars should go toward installing potable water there.

D. Many Glacier Hotel

We agree with the overall goals and objectives for the Many Glacier area. Most of the specific options proposed in the CSP are appropriate and well thought out.

We have strong reservations, however, about the proposed conversion of the Lower Dormitory to guest housing. We question whether the Many Glacier compound can accommodate the extra human and vehicular traffic. We also strongly oppose moving Many Glacier employees off-site, as the Lower Dorn project seems very likely to do. The following are our specific comments with regard to Many Glacier:

5

(1) **Off-Site Housing.** We oppose housing Many Glacier employees off-site at Swiftcurrent or outside the Park. Such a move would adversely affect community spirit

5. The improvements in the housing and new recreation facilities would increase employee morale rather than decrease it. The current concessioner was consulted and indicated that housing employees between Swiftcurrent and Many Glacier would not cause insurmountable scheduling problems. There are site limitations to building all the replacement housing at the Upper Dormitory area in Many Glacier.

Comment

Response

5

room at Many and at Swiftcurrent (which have very different cultures). The loss of community spirit and morale would translate into more mid-season contract breaking and serious service problems. Off-site housing also would make it more difficult to handle daily staffing problems (e.g., unpredictable bus tour arrivals, employees overdue from hikes) and increase congestion on the roads. We emphatically urge that on-site housing options be selected at Many Glacier and other Park locations.

(2) **Conversion of the Lower Dormitory.** The Preferred Alternative suggests converting the Lower Dormitory (which has been used as employee housing for some 90 years) to approximately 30 guest rooms. A new dormitory building would be constructed near the present Upper Dorm.

We see considerable merit in this alternative. The dormitory sometimes has a disorderly appearance which detracts from the sense of arrival at the hotel. The dormitory generally is well-buffered from the guest rooms, but occasionally may cause annoyance for guests. Consolidating employee housing further away near the Upper Dormitory area seems a reasonable approach.

However, we are deeply concerned with some ramifications of the conversion. Here are several serious issues:

6

- **Increased Vehicular Traffic.** The Preferred Alternative would add 30 guest rooms in the lower dorm, plus other rooms in the hotel which presently are occupied by employees. This would translate into a need for perhaps an additional 40 spaces in the parking lot. The lot already is subject to parking demands exceeding its capacity. Even if employee vehicles were moved off-site, the lot might have to be expanded, leaving little space for additional dormitories and employee recreation.
- **Increased Human Traffic.** Adding 30 to 40 additional guest rooms would require the dining room to feed perhaps 80 additional people at mealtimes, and would increase congestion in the lobby. A number of additional hotel employees (housekeepers, waiters, kitchen help) would be needed to service the additional guests. Can the Many Glacier compound and facilities comfortably handle this extra traffic? This is a very important issue which deserves specific study.
- **Renovation Potential.** In its present form, the Lower Dorm seems most suitable for a hikers' hostel or for low-cost accommodations. Each side of the dormitory has a common bathroom serving rooms on all three floors, and the décor is very rustic. Even if the building were heavily renovated, with individual bathrooms, it may not be marketable for "standard, high, or deluxe rooms," as the draft CSP suggests. Most views are obstructed, and in foul weather guests would have to walk 100 yards into the wind and driving rain for food and other services. These factors should be studied carefully in projecting the future of the building.

6. Your point is good about the increase in vehicle traffic and parking needs for additional guests and employees at Many Glacier. We have looked at alternatives for parking, including potential off-site parking for long-term employees, minor expansion of the existing parking into adjacent areas that are already disturbed, and redesign and re-striping of the current parking lot. This issue would be addressed in more detail during the design phase. After reviewing public comments on conversion of the Lower Dormitory at Many Glacier to guest accommodations, the text in Appendix 4 has been altered to add the option of budget/hostel accommodations to Swiftcurrent.

It is estimated that with the preferred alternative, there would be a total guest room increase of between 14 and 24 at Many Glacier. The specific number would be determined during the design phases and would stay under the cap of 28 additional guest rooms parkwide. There would likely be increased vehicular traffic and demand for parking, as you point out, under Many Glacier alternative C. We have looked at alternative parking sites, including potential off-site parking for long-term employees, minor expansion of the existing parking into adjacent areas that are already disturbed, and redesigning and re-striping of the current parking lot. As was evident during summer 2003, the need for additional parking already exists. This issue will be addressed in more detail during the design phase. The increases in food service demands could be addressed through operational changes. Employee housing demand could be adequately addressed through the combined housing proposals in the preferred alternatives for Many Glacier and Swiftcurrent. The proposal to convert the Lower Dormitory for guest accommodations was determined to be feasible through analysis by an architectural and engineering firm. We appreciate the concerns that guests would need to go outside to access the main building, however this is the case in most of the

Comment

Response

6

- **Effect on Employee Accommodations.** We are concerned that funds may not be available to build new employee housing near the Upper Dorm. If that proves true, then conversion of the Lower Dorm to guest rooms would force removal of most of the Mary Glacier staff off-site, to Swiftcurrent or outside the park. We also question whether new dormitories and recreation space (as well as an expanded parking lot) can fit within the existing "footprint" of the compound and its immediate environs. The slope behind the present parking lot and horse corral may be difficult to excavate and unsuitable for construction. These issues should be addressed before conversion of the Lower Dorm is approved.

In sum, we see very complex problems with the Lower Dormitory project. Unless these problems can be specifically and confidently resolved in the context of the CSP, we think that this project should not be approved.

The best resolution may be to adopt the less problematic Alternative B, with the Lower Dorm project noted as a potential long-range option. The project then could be studied systematically, either in conjunction with the new concession contract or in the aftermath of that contract.

(3) **Recreation of the Circular Staircase.** We endorse reinstatement of the double-helix staircase, which historically was Mary Glacier's best-known architectural feature. Reconstructing it (as proposed in Alternatives B and C) is an intriguing and attractive proposal. However, the ramifications of the project need to be given careful study. We have taken input from Harlan Berntsen (the construction manager for Mary's renovation in the late 1950s), Ray Kinley (who worked at Mary from 1919-1977, and left extensive tape-recorded memoirs), and other old-time employees. Here are some specific issues:

7

- **Relocation of Retail Space.** The Circular Staircase was removed primarily in order to enlarge the gift shop (the early lobby included a gift shop or newsstand/smoke shop retailing operation, but it occupied much less space). The draft CSP states that "retail services would be relocated" to reconstruct the staircase. We understand that the proposed relocation would be downstairs in the St. Moritz Room. This site should be specifically designated in the CSP. Other possible sites would be unworkable – e.g., (1) the Swiss Room and Interlachen Lounges are needed to accommodate waiting diners; (2) the Lucerne Room downstairs is needed for ranger/naturalist talks, religious services, performances, conventions and meetings; and (3) converting a number of first-floor, mountain-side rooms could create unacceptable congestion in the hall and annoyance for nearby lake-side rooms.
- **Noise.** This was another major factor in the staircase's removal. The St. Moritz Room (formerly the Bamboo Room and the Grill),

6

overnight accommodations at the developed areas throughout the park and would not be a determining factor in rejecting this alternative. The need for budget/hostel accommodations for the east side of the park has been considered and incorporated into the Swiftcurrent preferred alternative. As with all proposals in the commercial services plan, priorities would be set and the implementation phased according to these priorities (for instance, replacement housing would be constructed before the housing supplied by the Lower Dormitory is lost during conversion). This issue would be addressed in the design process for the facilities at the Upper Dormitory site, as would the siting of the additional housing and recreational facilities. Overflow needs would be addressed at Swiftcurrent or outside the park.

7. Your points about the location of the gift shop are well made. We have considered two sites for the shop; the downstairs St. Moritz room would be the preferred site. We also considered the conversion of some guest rooms on the main floor. We did not consider the other locations you mention for the same reasons you outlined. The circular staircase would be designed in consideration of the Lucerne Room and lobby.

Comment

Response

7	<p>downstairs from the lobby, has been used for dances and other nocturnal activities throughout the history of the hotel. The Circular Staircase used to funnel downstairs noise up into the lobby, which brought vociferous complaints from the overhead lobby-balcony guest rooms. The new staircase should be designed with an eye to buffering noise from potential late-evening activities in the non-retail portions of the St. Moritz Room or in the Lucerne Room.</p> <ul style="list-style-type: none"> • Performance Space. The Circular Staircase would destroy the performance area in the St. Moritz Room, where stage productions have been presented for more than 40 years. It is very important that the new staircase be constructed in such a manner as to preserve the stage in the Lucerne Room and to preserve performance space in the lobby. • Priority. Restoration of the staircase is an attractive and worthy project, but we see it as a mid-level funding priority. In our estimation, restoring full services at Granite Park is a higher cultural/historical resource funding priority.
8	<p>(4) Employee Entertainment. Employee entertainment is one of Mary Glacier's most important traditions, dating back to the hotel's early decades. The CSP should call for the preservation of this tradition, especially by providing for adequate performance space in the Lucerne Room and in the lobby.</p>
9	<p>(5) Insignia Preservation. For many decades, all of Glacier's lodges have had distinctive insignia emblazoned on shields on their guest room doors. Mary Glacier's is the Swiss cross. This insignia appropriately reflects the hotel's chalet styling and the dindli uniform worn by early employees, and has become a long-standing tradition. It should be preserved in the interior renovation of the hotel.</p>
	<p>E. Rising Sun</p> <p>We approve of the Preferred Alternative, and think that it is one of the best in the CSP. Removal of housing units from the Camp Store and Coffee Shop, consolidation of employee housing in and near the Lower Motel, and relocation of the registration desk all are well-conceived proposals. We offer the following comments and suggestions:</p>
10	<ul style="list-style-type: none"> • Landscaping. Rising Sun presents a rather arid face. One former employee describes the visitor's first impression as "a sea of asphalt," surrounded by dry bushes and grass. The large parking area has been sequestered by reclaiming some asphalt areas, but more progress should be made (perhaps including flowerbeds). The old gas station site, now the red bus parking area, is especially arid, and would be a prime landscaping site.

- Commercial entertainment (either by contract or by employees) is considered necessary and appropriate within the existing concession facilities. Preserving space for these activities would be considered when rehabilitating the interior spaces in the hotels.
- The insignia you mention were added to the hotels in the 1980s, and they are not historic. During the rehabilitation of the hotel interiors, appropriate historic themes would be considered.
- Specific landscaping for the Rising Sun parking area would be addressed during the design phase of the project; your suggestions would be taken into consideration. Regarding your comment about the floodplain, this map was meant to show the approximate boundary of the floodplain for planning purposes. The map's scale cannot show differences of 30-50 feet. Construction of additional trails is beyond the scope of the commercial services plan.

Comment

Response

10

- **Flood Plain.** A Rising Sun employee who was present during the 1975 flood states that the flood plain shown in the CSP is too small. He states that "Rose Creek broke out of its channel upstream and went through and around the camp store. It also went into the basement of the coffee shop. We then had string water behind the coffee shop and between the shop and Going-to-the-Sun Highway. So the flood zone in my opinion needs to move eastward another 30-50 feet." Reinforcement of berms to protect the buildings, as proposed in the CSP, should take this historical experience into account.
- **Trail.** There is only one real trail (Rose Creek/Otokeri Lake) in the Rising Sun area. Construction of additional short trails might be considered to provide more recreational activity and more dispersal of hikers.
- **Boat Concession Housing.** The boat concession housing is long established and family supervised, and seems reasonably well screened from the guest facilities. We support allowing it to remain in its traditional location.

F. Lake McDonald Lodge

Of all the lodging compounds in Glacier, Lake McDonald has the most complicated landscape and building arrangements. Planning for this location accordingly needs to be done with a high degree of specificity and care.

We support the general goals and objectives set out in the draft CSP. Better separation of employee and visitor areas, replacement of the Coffee Shop with a building of more appropriate design, addition of pathways and more green space, and rehabilitation of historic structures all are sound priorities. Conversion of the Garden Court, Cobb, and Snyder dormitories to guest use are appropriate because of their location.

We believe that the alternatives proposed in the draft CSP can be improved in important respects. We offer the following recommendations:

11

- **South-End Employee Housing.** We believe that employee housing could best be consolidated in the southern part of the compound. This arrangement would separate guest and employee living areas much more effectively than the proposed alternatives in the north end of the compound. In keeping with Lake McDonald's traditional visual character, we suggest building several smaller new dormitories rather than one or two large structures. These new dorms could be constructed in three visually-dispersed, but geographically-proximate clusters: (1) new, small buildings could be erected near the current locations of the Boys 1 and 2 buildings; (2) the historic Johnson and Hydro dorms could be rehabilitated, and one or two additional buildings constructed behind the historic structures; (3) a new employee housing group could be developed in the old sawmill area to the southeast of the Lodge's west access road (a footpath could connect this area to the main lodge location, and a

11. Thank you for your suggestions. While they have aesthetic appeal, the south end area is within the floodplain. It is important bald eagle roosting habitat, and is in the middle of a unique cedar/hemlock forest type. One of the main reasons the northern location was selected as the preferred site is because it is less environmentally sensitive. You are correct about the West Access Road. We have removed that action from the preferred alternative. Under the preferred alternative, the Stewart Motel would be removed, and a new guest motel would be constructed in the same site; the motel site would not be used for employee housing.

Comment

Response

- 11
- **West Access Road.** While the Preferred Alternative's proposal of a foot and bicycle trail is attractive, we oppose closing the west access road to the lodge for historical reasons. The road is an original alignment of Going-to-the-Sun Road, still serves useful purposes, and in our opinion should be preserved. If employee housing were consolidated in the south end of the compound, as we suggest, this road would be needed to serve that area.
 - **Stewart Motel.** We support closure of the motel, as proposed in the Preferred Alternative. However, we suggest that a new motel be located near the Coffee Shop (where the Preferred Alternative would place new employee housing). The present motel site is inappropriately mixed with inholders' cabins. The Stewart Motel should not be converted to employee use (as suggested in Alternative B) even for management-level employees, since conflict between employees and inholders at such close quarters would be very likely.
- 12
- **Possible Restoration of Cabins to Swiftcurrent.** Ten of the cabins presently used as employee lodging at Lake McDonald were originally part of the Swiftcurrent compound. If financially feasible, these cabins might be returned to Swiftcurrent as part of the proposed restoration of cabin circles there.
- G. Swiftcurrent**
- The alternatives proposed for Swiftcurrent are creative and thoughtful. We approve the overall objectives of the draft. The Preferred Alternative has attractive points. However, we think that Alternative C is a demonstrably better plan.
- The Preferred Alternative would house all the guests in cabins and would convert all four motels to employee housing. This concept has merit in enhancing the historic cabin-camp theme, but it has several serious drawbacks. Alternative C (retaining a motel/cabin mix, with new employee housing sited to the east), is a better concept, for these reasons:
- 13
- **Better Employee/Visitor Separation.** The main motel complex is very close to cabin circles D and I, and is immediately adjacent to the very busy Iceberg/Pinnigan trailhead. The Preferred Alternative, thus, would not achieve good employee/visitor separation. Alternative C would place employees in the Alpine Motel building (which confines noise insofar as the rooms all open onto an interior hallway) and in new quarters east of that building, achieving a more effective degree of separation.
 - **More Options for Visitors.** The motels provide an important middle-ground accommodation – more comfortable than the rustic cabins and more affordable than Many Glacier Hotel. This option has been in place at Swiftcurrent for many decades. The motels will continue to exist under either

12. Moving the original cabins from Lake McDonald to Swiftcurrent was discussed during the early stages of this plan, but was rejected due to the cost of moving cabins and the alterations that have been made to the cabins for that area, versus the cost of building new accommodations.
13. Your points are well made about the benefits of alternative C, however the park's preferred alternative is B because, compared to A and C, it would provide good separation of guest and employee functions and enhance the visitor experience by restoring the cabin circles. The new cabins would be less rustic than the existing cabins and would have private baths within them. The alternatives for Swiftcurrent and Many Glacier are dependent on each other. Alternative B for Swiftcurrent would house Many Glacier employees in the motels at Swiftcurrent rather than outside the park. Housing of employees has been a difficult issue to resolve. We felt that using the existing motels and filling in the historic cabin circles would cause less environmental impacts than other new construction. We also believe that transportation between the two sites could be addressed by an employee shuttle.

Comment

Response

13

Alternative B or C, and we think that it is reasonable to keep them available to visitors.

- Impact on the Many Glacier Community. The hotels contain many more units than are necessary to house the Swiftcurrent staff. The Preferred Alternative thus would very probably lead to the housing of dozens of Many Glacier employees at Swiftcurrent. We oppose this "concocter" arrangement, which would undercut community spirit at Many and at Swiftcurrent as well.

II. Motor Vehicle Tours and Public Transportation Services

The CSP deals very briefly with motor vehicle tours. This brevity reflects the decision to defer planning of a parkwide transit system pending rehabilitation of Going-to-the-Sun Road. This rehabilitation project may extend for 7 to 20 years.

We think that more planning attention is due to this prominent element of Glacier's visitor services in the intervening years. Our membership includes several dozen former "granjammer," dating back to the mid-1930s. Many of them were involved in the effort to rehabilitate the red buses, and in the granjammer reunion last summer. Having solicited their input, we offer the following recommendations.

14

(I) A Separate Transport Services Contract. We recommend that red bus services be bid as a separate contract from the lodging services contract in 2005. In recent decades, these concessions have been combined, but historically they were separate. The Park Service's recent acquisition of Glacier's red buses, coinciding with the end of the current contract, makes it appropriate to consider separating the contracts again.

Glacier Park, Inc. (GPI), the lodging concessioner, has operated the transport system well. GPI and other parties should be allowed to bid for both the contracts. However, the specifications for each contract should be designed to stand alone. Separate bidding would offer these advantages:

- Better Focus. The present, unified contract system encourages bidders to view the transport system primarily as a means of servicing the lodges. Separate contracts would encourage bidders to focus on a broader range of transport issues in a more long-term perspective.
- More Creativity. Separate contracts would encourage bidders to think creatively and to propose innovations (e.g., concerning basing, staff and maintenance facilities, visitor accessibility, advertising, and reservations). A separate prospectus would probably attract a wider field of concession candidates and a wider range of ideas.
- Better Groundwork for the Ultimate Transit Plan. A separate contract would facilitate the development of the parkwide transit plan. It would best implement

- The decision about whether to keep transportation in a larger operating contract (as it is now with the hotels and retail operations) or to treat it as a separate contract should be made by considering a broad variety of factors, including economic feasibility, service to visitors and logistical support. Separating the contract into several smaller ones might increase the opportunities for competition, but a smaller contract would diminish the ability to generate the cash flow necessary to operate and may require duplicate support structures and facilities. That decision will be made during development of prospectuses for new contracts.

Comment

Response

the goals of the GMP in the intervening years. Bidders would be prompted to think in terms of long-range objectives (e.g., encouraging travelers to park-and-ride over Going-to-the-Sun Road) that may not correspond completely to the concerns of bidders on the lodging contract.

(2) **Contents of the Transport Services Contract.** The new transport contract should very specifically address a number of areas. Among those areas are:

15

- **Red Bus Maintenance.** Preserving the benefits of the recent red-bus restoration is a crucial priority. The contract should be drafted in consultation with red-bus experts (e.g., Bruce Austin and Ford personnel) to specify preservation standards, maintenance schedules, and regular evaluations of maintenance.
- **Accessibility for Hotel Guests and Off-the-Road Travelers.** The contract should ensure that off-the-road travelers have effective access to buses (including the bus reservation system) without obligation to stay in the lodges. On the other hand, an independent transportation concessioner should be required to fully serve the needs of lodge visitors. The transport and lodging contracts both should call for transportation agents to be stationed in the hotels.
- **Driver Qualifications and Training.** The contract should specify high standards of driver training. In particular, it should call for high quality interpretive materials and orientation to be provided in consultation with the Park Service.

16

1. Hikers' Hostels

We support the establishment of hikers' hostels for students and other travelers of limited means in Glacier's lodging compounds. Some existing older buildings (e.g., the old registration building at Rising Sun, and the Cobb and Snyder cabins at Lake McDonald) would be good candidates for conversion to hostel facilities. Rising Sun is an ideal hostel site because of its location and low-budget atmosphere. Hostels also could be established at Two Medicine and at Swiftcurrent. Procedures followed by the American Youth Hostel Federation should be used as models. Bidders for the lodging concession contract in 2005 could be required to include hostels in their proposals.

17

2. Guided Motorcycle Tours

Some of our members with season-long experience in Glacier in recent years have strongly complained of the noisiness of motorcycle convoys on Going-to-the-Sun Road. We oppose the authorization of guided tours so as not to encourage or increase this level of noise. If such tours are authorized, they should be closely restricted in terms of group size, group frequency, and types of machines approved to minimize decibel levels.

15. Your comments regarding details of the new transportation contract will be taken into consideration when prospectuses are prepared for the new contracts. The current contract for operating the historic red buses was developed with input from Ford Motor Company regarding the maintenance requirements of the buses.
16. We have modified the preferred alternative and included this type of accommodation at Swiftcurrent. The Rising Sun facility you suggest using is within the floodplain. Furthermore, by providing hostel facilities at Swiftcurrent and Lake McDonald, these services would be offered to visitors on each side of the park.
17. The park has determined that motorcycle tours are not necessary and appropriate based on public concerns.

Comment

Response

18

K. Underwater Diving Tours

We suggest that such tours be restricted to front-country lakes with road access. In backcountry lakes, we think that the balance of values weighs against such tours. We would include Lake Josephine in the backcountry category where tours are inappropriate.


L. Conclusion

We believe that the single most important issue posed by the CSP is the future status of Granite Park Chalet. We urge the Park Service to restore the historical full-service format there.

We urge attention to the other matters raised above, and especially to those which have not been assessed in the current draft. On some points, we think that Preferred Alternatives should be changed or should be deferred until the completion of further studies.

On the whole, however, we think that Park Service personnel have done a thoughtful and impressive job in preparing this draft of the plan. Glacier's visitor facilities are intricate, and require careful weighing of historical, cultural, environmental, and utilitarian values. We commend the Park Service for its conscientious effort both to research and to balance these complex factors.

Sincerely yours,

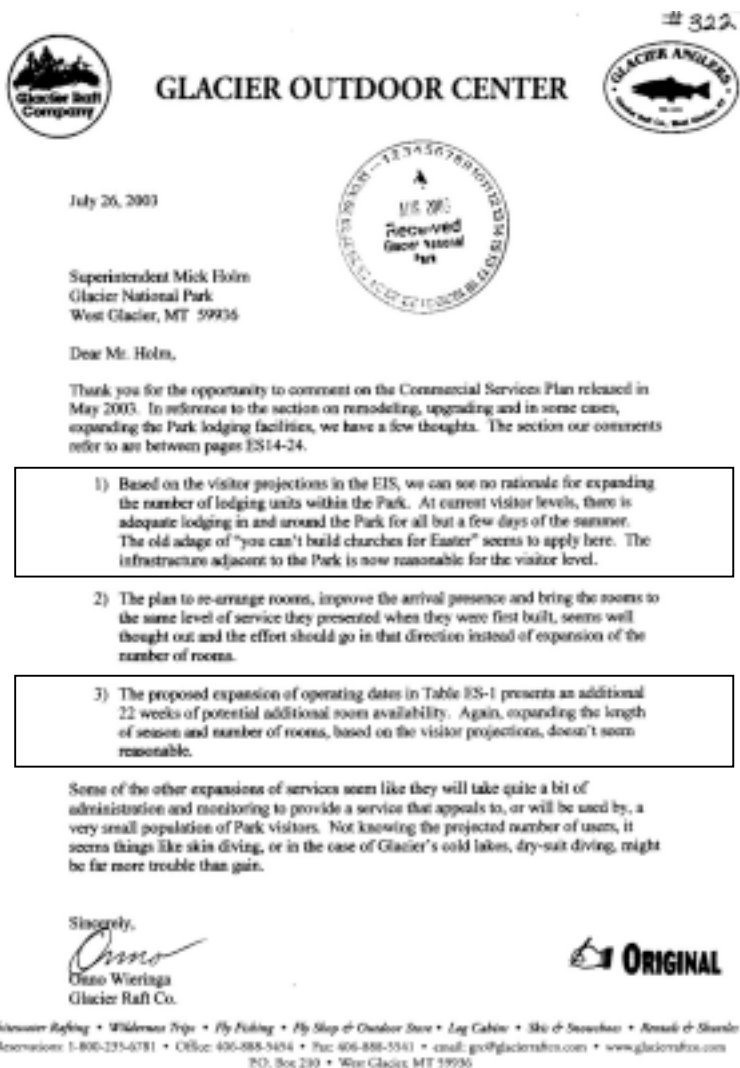


For the Board of Directors
of the Glacier Park Foundation

18. Lake Josephine falls within the day use management zone as designated in the 1999 General Management Plan. Activities such as guided diving would be appropriate in day use zones.

Comment

Response

**Comment #322 (Glacier Outdoor Center)**

1. See comment #318, response #1.
2. The dates are outside dates that would be evaluated each year in consideration of resource issues that may arise. The extension of operating dates is not based on visitor projections. The concessioner and park management over the years have suggested consideration of minor extensions of the operating dates at these facilities. Furthermore we are not proposing an additional 22 weeks of operation. The proposal is to extend operations at the developed area sites from 2-8 weeks, depending on the location. Adding these extensions to total 22 weeks misrepresents the proposal.

Comment

Response

#325

7-28-03

Mick Holm, Superintendent
Glacier National Park
West Glacier, MT 59936

Dear Superintendent Holm,

We would like to comment on the Commercial Services Plan.

Given our commercial holdings in Apgar, we are keenly interested in the Apgar area and its future.

We support the continued management of Apgar Village as a developed visitor use area. Further, we favor management plans that keep Apgar visitor-friendly.

We believe the pedestrian walking lane that starts near the bicycle path and continues north toward Lake McDonald is properly located; the commercial buildings and current Visitor Center are a natural anchor for foot traffic.

1

Management of pedestrians would become more critical with proposed changes in parking. At the March 2003 scoping session held at the Conference Training Hall, it was proposed that the 28 parking spaces along the lakefront and the water fountain area on the oval be relocated to the 'curve.' This area is directly west of the sewer lift station on the north side of the Going to the Sun Road, and directly across the road on the south side of the curve. This is a relatively high-speed curve in Apgar, and we believe creating parking that enters and exits (backs out) directly into Going to the Sun Road will be hazardous. We believe it will also create undefined pedestrian traffic that will create additional vehicle/pedestrian conflicts. The discussion about where the parking would be relocated to was a bit vague; we believe it needs to be carefully defined.

2

The goal of managing foot traffic and lakeshore use will be challenging and might be well-served by assessing the availability of parking. At the March 2003 session, it was suggested that the overall parking plan should consider

 ORIGINAL

Comment #325 (West Glacier Mercantile)

1. Thank you for your comments. During the design phase of development, we would consider the concept of separating parking from the road, much like the current parking at the boat launch. Parking areas would be determined more specifically during the design phase. We would continue to meet with land and business owners in Apgar to provide information on the designs being considered for this area. You are referring to an earlier, more detailed version of the plans for Apgar, however we decided to retreat from that plan to assure that we would have public input and agreement on conceptual plans for the area prior to determining specific designs.
2. You may be correct, but the Discovery Center will include parking. This will partially be designed as part of the Transportation Center to support the rehabilitation effort of the Going-to-the-Sun Road. We hope to provide enough parking in the vicinity of the Discovery Center along with a walking/biking trail between Apgar and the Center so that additional parking pressure would not be placed on Apgar.

Response

Comment

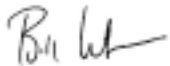
2

the parking design of the proposed west side Discovery Center. This is correct long-term thinking, but this scenario should recognize the immediate effects of parking relocation.

It may be inevitable that more parking needs to be constructed in the Apgar developed area regardless of planning for the Discovery Center. If the Apgar plan creates visitor confusion or a greater unmet parking need, we fear it will increase existing parking pressure on our guest parking.

We appreciate the planning attention that Apgar is receiving and the opportunity to comment.

Sincerely,



Bill Lundgren
for West Glacier Mercantile
West Glacier, MT 59936

Comment

Response



P.O. Box 9283
Missoula, Montana 59807
Tel: (406) 549-1142

Bob Clark
Conservation Organizer
sierrabob@wildhockies.org

#326

Rec'd
7/30/03
10

Superintendent
Attn: DCSP/DEB
Glacier National Park
West Glacier, Montana 59936

glac_public_comments@nps.gov

July 27, 2003

Dear Superintendent,

Please accept the following comments on behalf of the approximately 2400 members of the Montana Chapter of the Sierra Club. For decades Sierra Club members have enjoyed hiking, fishing, and other forms of recreation in Glacier National Park. We live in the nearby communities that benefit from cold, clean water and the incomparable natural beauty that Glacier NP provides.

We are concerned with the level of backcountry development in Glacier National Park, particularly Grinnell Park Chalet, and whether it should be managed as a semi-primitive hikers' shelter or as a fancy, full-service facility. The Montana Chapter of the Sierra Club strongly supports Glacier's preferred alternative to keep the Grinnell Park Chalet as a hikers' shelter.

We would like to see the Chalet continue to be operated as a hiker shelter with restrooms, water and cooking facilities. This management alternative is less expensive for both taxpayers and hiker users than the alternative proposed to establish full service dining and lodging. This full service alternative, which would require on-site housing for eight employees, also would increase demands on water, sewage, and graywater disposal systems. The hiker shelter system has been operated very successfully in recent years and has been popular with visitors. The facility operates with minimal environmental impacts in a sensitive alpine environment - we'd like to keep it that way.

Thank you for this opportunity to help direct the management of our public lands.

Sincerely,

Bob Clark, Conservation Organizer
Sierra Club
PO Box 9283
Missoula, MT 59807

ORIGINAL

Comment #326 (Sierra Club)

Thank you for your comments.

Comment

Response



Glacier Park Boat Co.

Scenic Boat Tours & Small Boat Rentals
Many Glacier • Lake McDonald
St. Mary Lake • Two Medicine

#336



July 29, 2003

Michael Holm, Superintendent
Glacier National Park
West Glacier, MT 59936

Dear Superintendent,

Thank you for the opportunity to review the Draft Commercial Services Plan. We are aware of the amount of work this document reflects. Overall the DCSP represents proactive stewardship by the National Park Service. It does a responsible job of balancing visitor use with preservation goals. We offer the following comments.

Many Glacier Area

Upgrading the trail around Swiftcurrent Lake and the connecting trail between Swiftcurrent and Josephine Lakes for accessibility would greatly enhance visitor use. We support this idea enthusiastically.

Rising Sun Area

Glacier Park Boat Co. needs to be housed separately from GPI. Our small company attitude and operations are significantly different from the larger concessionaire and commingling our staff in the same dormitory would not be suitable.

Security needs for our boat dock will need to be addressed when the ticket office housing is removed.

We suggest adding our new ticket office to the front of the existing comfort station as an effective use of the lakefront site.

Two Medicine Area

The parking lot at Two Medicine is often filled to capacity. Removing parking and not replacing it elsewhere would only exacerbate this problem.

Boat Tours and Transportation

Our understanding is that our tour boats are exempt from the Americans with Disabilities Act due to their historic standing. We would be opposed to a blanket obligation to modify all of our boats for mobility-impaired visitors; however, we would be possibly willing to adapt some of our boats on a case-by-case basis.

P.O. Box 5262 • Kalispell, MT 59903-5262
(406) 257-2428 • Fax: (406) 756-1437
www.montanasrvs.com/gpboats

ORIGINAL

Comment #336 (Glacier Park Boat Co.)

1. The housing would be designed to be separate, but in the same vicinity as described in the preferred alternative. The preferred alternative has been modified to clarify this. We believe that your needs and ours could be met through good design.
2. Security needs would be addressed in a new concessioner contract. That level of detail is beyond the scope of this plan.
3. This is a good suggestion. The site you propose is within the area under consideration and we would look closely at your suggestion during the design phase.
4. We are only proposing to remove six parking spaces from Two Medicine. The problems that removal might create would be considered as we redesign that area. Re-stripping the existing lot might replace the six spaces.
5. Your understanding is correct. The commercial services plan states that "tour boats would be modified as necessary to improve access for the mobility-impaired public." Any new vessels would have to be ADA compliant.

Comment

Response

6

Guided Day Hiking

Limiting the number of day use hikers is a poor approach to the preservation of natural resources. We see this alternative as inconsistent with the National Park Service's dual mandate to preserve and provide. The plan addresses the preservation aspect while overlooking the obligation to provide for public use of the resource.

7

We are aware of the impact that large numbers of hikers have on a few heavily used trails in our Park. Popular day use trails need to be designed and maintained to accommodate heavy and regular seasonal use.

Again, we are pleased to have the chance to comment on the Draft Commercial Services Plan. We are committed to working with the National Park Service and the public to preserve Glacier National Park while providing visitor use.

Sincerely,



Mark VanArsdale, President
Denise VanArsdale
Scott C. Burch
Barbara K. Burch
Art Burch, Jr.
Susan D. Burch

6. This plan only addresses commercially guided hikes. See comment #14 in the Grouped Responses to Individual Comments.
7. Design and maintenance of heavily used trails is beyond the scope of the commercial services plan. This issue will be addressed in the Backcountry Management Plan.

Comment

Response



Dear Superintendent Holm,

We greatly appreciate the National Park Service's solicitation of comments on its Draft Commercial Services Plan (DCSP). As representatives of the Glacier Institute, we are greatly interested in the plan and its impact both on the park and on our efforts and mission to, "Educate today for a sustainable tomorrow."

First of all, we would like to express our sincere appreciation to all the NPS personnel who devoted such obvious time and attention to the creation of this plan. In general, we are very pleased with the DCSP, especially in its proposed directives dealing with hiking group size and other "Preferred Alternatives."

It is with these thoughts in mind, and with great respect for all the effort involved in producing a document of this size and quality, that we submit the following input on Glacier National Park's DCSP:

Minor issues:

- Chapter 1: On pages 9-10, we would like to suggest the following changes to clarify each cooperating association's current activities (in red):

"The Glacier Natural History Association and Glacier Institute operate under cooperative agreements with the National Park Service. The goals of these cooperating associations are consistent with the purposes and values of the park and with park policy.

The Institute achieves these goals by offering educational programs that enhance the quality of the visitor experience and promote appreciation (and therefore protection) of park resources. The Natural History Association also promotes visitor understanding and appreciation of the park's mission and values by the publication and sale of books and other educational materials about the park. (The proceeds from sales support the park mission, especially educational efforts.)"

- Executive Summary: A portion of Page 8 reads as follows:

**New or Enhanced Commercial Services
Determined to be Necessary and
Appropriate for the Park**
Boat Transportation (water taxi)
Firewood Sales
Guided Natural and Cultural History Hikes**
Guided Underwater Diving**
Private Vehicle Shuttle**
Step-on Guide Service**
Guided Motorcycle Tours**
Taxi Services

ORIGINAL

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Comment #338 (Glacier Institute)

- The changes you have suggested were incorporated into the *Final CSP and Final EIS*.

Comment

Response

*Commercial entertainment outside concession facilities and other special events would continue to be regulated by management policies and special use permit requirements.
 **New services that are not currently offered.

Regarding the highlighted sentences, we feel that there is a misunderstanding. Perhaps this has been caused by a lack of clarity on our part, but we do in fact offer such courses at this time. For example, on page 27 of the Institute's 2003 course catalog you will see the program, "People, Places, and History," while on pg. 25, "Wildlife Discoveries of Lewis & Clark," might also qualify as both cultural and natural history, along with, "Railroad History and Folklore in Glacier National Park," (pg. 18). And we would note that several courses have been offered in past years that address Native American culture in this locale as well.

Other Areas of Concern:

- A larger and more general area of concern on our part regards our perception that in this document that there is no distinction made between "guided recreational hiking" and hikes led by a knowledgeable instructor with the clear priority of education.
- The existing wording within the DCSP appears to lump these categories together, as in Chapter 2, pg. 5:
"Guided Hiking (Cultural History/Natural History/Recreational)"

Also, this sentence appears under the above heading:

"No authorization for cultural and natural history hikes has been issued."

We are concerned that this wording does not make clear the situation that now exists as a result of our cooperative efforts with GNP.

We feel that the Institute currently provides educational opportunities within the park that are not provided by other cooperators/concessioners, and we feel that this distinction should be made. The Institute does offer educational hikes, as part of our programs, on a variety of subjects including cultural and natural history, which are led by instructors of the highest qualifications.

Perhaps a paragraph might be included which generally outlines the Institute's relationship with Glacier National Park as it now stands with respect to course selection. This process is intertwined with the Interpretive Division in that we: 1) research and develop a course list, occasionally working with park personnel in the idea-generating phase; 2) we meet with the Chief of Interpretation who reviews the list and determines whether or not the courses "fit" the park's mission and plans; and 3) the course/program list is finalized only after Park Service approval.

2. The text has been modified to indicate that "no authorization for commercially guided cultural and natural history hikes are currently offered." The Glacier Institute is not considered commercial for the purposes of this plan and is not regulated under concessions contracts or commercial authorizations. The park will continue to support the educational opportunities provided by the Glacier Institute as stated in the commercial services plan and per our Cooperative Agreement.
3. The details of the relationship of the Glacier Institute with the park are outside the scope of the commercial services plan and are more appropriate for the Cooperative Agreement.

Response

Comment

We believe the point should be made that Glacier National Park approves all Glacier Institute programs on a course-by-course basis when the subject matter pertains to and the course is taught within the park.

Clearly, the National Park Service and GNP consider in-park education as a high priority. This is well-documented in the GNP General Management Plan, and the Executive Summary of the DCSP which states that concessioners/cooperating agencies should provide quality services with regard to education (e.g. in ES-7: "Commercial services that provide guided interpretive, educational or other informational narrative would promote park themes and expand the visitor's knowledge and understanding of the park's unique qualities. Presentation should be patterned after National Park Service standards.")

We feel that the Institute and GNP are already cooperating in the arena of education in a positive and productive manner. A good working system is in place at this time that allows for wide-ranging interaction and the opportunity to generate and explore new ideas, all underneath the ultimate authority of GNP. We respectfully ask that mention be made of this relationship, as it is something we both should be proud of.

Thank you very much for your time and attention to these matters.

Sincerely,

The Glacier Institute

Alice F. Hutchison
Alice Hutchison, President

7/29/03

Paul Thompson
Paul Thompson, Executive Director

Comment

Response

#340



Michael Holm
Superintendent
Glacier National Park
West Glacier, MT 59936

Commercial Services Plan

Dear Superintendent Holm:

On behalf of the Montana Wilderness Association, I write to address two fundamental issues of national park management as they relate to your current Draft Commercial Services Plan. Those issues are: 1) Commercial overflights; and 2) service levels at Granite Park Chalet.

Commercial overflights have no place on or near a landscape that has been designated to protect natural values. There is evidence that low-level overflights disturb wildlife, but an equally large consideration is the effect that overflights have on the vast majority of park visitors who choose to experience the park's natural character in traditional, non-motorized ways.

The Park Service has done well over the years to protect and preserve the wilderness values of Glacier Park by prohibiting off-road vehicles and snowmobiles. With these farsighted and sensible protective measures in place, why are the experiences of those who visit the park's backcountry in quiet, traditional, non-mechanized ways - the vast majority of backcountry visitors in Glacier Park - allowed to be disrupted and cheapened by the noise and speed of airplane travel?

The 4,400 members of our organization, most of them Montanans and most of them fond advocates for Glacier Park, heartily encourage you to prohibit commercial overflights in the park. The Park Service committed to that course of action in its park plan, but little is apparently being done to follow through on the commitment. We urge you to address the issue and intensify your effort to execute your park plan.

In 1996 and 1997, the question of level of service in the park's backcountry chalets was a high-profile, much-debated issue in Montana. At the time, the Park Service elected to respect a large segment of the public that sought to protect the park's backcountry character by managing Granite Park Chalet to be consistent with the chalet's wilderness surroundings. Now, once again, some people are seeking to obtain "full-service" amenities at Granite Park Chalet. That notion violates the very idea of protecting Glacier Park's wilderness character and asking that people visit and use the park in a way that contrasts minimally with a primitive environment.

2000 Backcountry Service Management Plan
P.O. Box 445758 • Helena, Montana 59644
Tel: 406-445-7354 • E: bck-223@nps.gov • www.nps.gov/backcountry

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ORIGINAL

Comment #340 (Montana Wilderness Association)

1. Elimination of scenic air tours from the park is outside the scope of the commercial services plan. Airspace and its use, including commercial air tours over any national park, are solely within the jurisdiction of the Federal Aviation Administration (FAA). As you are aware, the General Management Plan resulted in our decision to ban scenic air tours from the park. We were notified earlier in 2003 that the FAA wanted to begin the process of developing an air tour management plan for Glacier National Park pursuant to the National Park Air Tour Management Act of 2000. The need for such a plan was triggered by applications from operators who currently fly air tours, and from operators who wish to do so. We were scheduled to meet with the FAA in August 2003, but postponed the meeting until October due to the fire activity during the past summer. We were then notified in October that the FAA had decided to postpone initiation of the planning process for Glacier to concentrate on other park air tour plans that had already been initiated. Currently, it is likely that the planning process for Glacier would be started in 2005.

The National Park Service Natural Sounds Program in Fort Collins, Colorado represents the agency in the air tour management planning process. Glacier National Park is working with the Natural Sounds Program to begin conducting noise monitoring in the park, and to explore the feasibility of conducting an additional visitor survey specific to noise and visitor expectations.

2. See response to comment #273.

Response

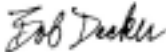
Comment

We urge you to resist the pressure of people who mistakenly believe that "unique wilderness experiences" (as one advocate for full-service chalets used the term at a recent public meeting in Great Falls) will remain possible if urban-oriented, non-wilderness-compatible activities are allowed in the park's backcountry. Glacier Park is increasingly valued as a "wilderness park"; please do reverse the increasing cultural and environmental value of that approach to park management by relenting to shortsighted visitors who measure the park's worth in terms of laundry service and huckleberry pie.

The Montana Wilderness Association has worked with the Park Service on the issues of commercial overflights and chalet management for many years. We are deeply committed to maintaining the wilderness character of Glacier Park, and we will work closely with you toward that end. If we can be of assistance in any way, please contact me.

Thank you for your attention to these thoughts.

For a wild, enduring Glacier Park,



Bob Decker
Executive Director



#343



July 27, 2003

Mick Holm
Superintendent
Glacier National Park
West Glacier, MT 59936

ORIGINALLY FAXED

Dear Superintendent Holm:

I'm writing in reference to the draft Commercial Service Plan that was presented in May of 2003. In the planning assumptions, there was a portion that addressed the terms "necessary and appropriate" and how they related to commercial services. While I agree with many of the preferred alternatives, I do have concerns about specifics included among those alternatives, and whether or not they are necessary and appropriate. My comments are as follows:

1. **Granite Park Chalet** – As this is one of the two remaining chalets in the park, I feel that full services should be restored to create the experience that is not duplicated anywhere, except at Sperry Chalet, where it is provided to a limited number of people. The public is certainly willing to pay for this "once-in-a-lifetime" experience, which fully brings back the history of these beautiful chalets. Those wishing to camp and cook their own meals have the campground close by to fill their needs.

2. **Firewood Sales** – The sale of firewood by the National Park Service in select campgrounds, puts the Service in direct competition with concession camp stores and facilities located immediately adjacent to the park. The reasoning behind firewood sales is indicated as "this service has long been requested by the public and could be managed in a manner that meets all the appropriate criteria." This reasoning is flawed because it does not address the issue of the Park Service entering into commercial retail sales, in direct competition with existing facilities. It is not the idea of firewood sales that concerns us; it is the setting of a precedent that may open the door for future requested commercial goods and services, such as film, bottled water, newspapers, propane, briquettes, postcards, etc. The National Park Service should not enter into the business of commercial retail sales. Providing these goods and services to the guest, should be left to the businesses that are currently filling this need.

3. **Horseback Riding** – We do not believe that the status quo should be the preferred alternative. The Park presently has only one concessionaire, and no access is allowed in the St. Mary, East Glacier, and Two Medicine areas, for guided rides. We have reinstated horseback riding at St. Mary and our horse operation would like access to the Red Eagle Trail, which is a lightly used hiking trail and has historically been used by horses for many years. This would provide the St. Mary horse operation the opportunity to provide guests visiting Glacier with a full day ride, out

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ORIGINAL

Comment #343 (The Resort at Glacier)

- As with all the services considered in this plan, firewood sales, both current and proposed, would be provided by commercial operators, not the National Park Service. Existing operators would have the opportunity to bid on (if a concessions contract) or apply for (if a Commercial Use Authorization) the rights to provide this service.
- The National Park Service has taken this comment and others into consideration, and has changed the preferred alternative to alternative C with modifications that would allow rides on certain trails at Two Medicine. The St. Mary area would not be included due to environmental issues including possible impacts to bull trout, noxious weed introduction, soil erosion and trails.

Comment

Response

St. Mary Lodge & Resort

2

of the St. Mary area. Alternative C should be the preferred alternative, which would also provide opportunity for the horse operations at East Glacier.

3

4. **Existing Room Base** – In the overall Commercial Services Plan, it is proposed that an increase of 30+ rooms be added to the existing room base for the concessionaire. This, coupled with the proposed expansion of operating dates, would have a definite negative impact on the guest facilities, immediately adjacent to the park. It was our understanding that the philosophy of the National Park Service, was to encourage future expansion outside the exterior boundaries of the national park, as opposed to creating additional rooms for the existing concessionaires. Facilities inside the park, run by the concessionaire, have a distinct marketing advantage because of their relationship with the National Park Service. All inquiries to the park concerning accommodations are directed exclusively to the concessionaire, by the NPS. Therefore the concessionaire spends very little money on advertising and promotion, as a percentage of the sales they generate. The smaller operations on the outskirts of the park, cannot afford to do the national advertising necessary to overcome the advantage that the concessionaire is being given in the marketplace by NPS. The addition of 30+ units would be very disruptive to the surrounding community businesses, as we have only been filling our accommodations on a consistent basis for approximately four to five weeks each summer. Adding luxury, high, or standard accommodations to the present room base would adversely affect the existing facilities immediately adjacent to the park, and result in an economic boon only for the concessionaire. Therefore, we are strongly opposed to any increase in the number of luxury, high, or standard accommodations being added to the present room base. I am certain that the business communities surrounding the park agree with our opinion.

4

5. **Extension of Operation Dates** – It would certainly make everyone happy if traffic in Glacier National Park required the extension of dates on the facilities in the park. As mentioned above, the facilities immediately adjacent to the park are presently filling for only four to five weeks, during the heart of the summer season. Adding to the dates of concessionaire operation would create an additional negative economic impact to facilities outside the park, which are presently filling the needs of the traveling public during the shoulder seasons. What we have experienced in the past, has been the concessionaire waiting in the wings for the rest of the region to promote and increase the shoulder seasons, then stepping in to "take the cream." If it is the intention of the National Park Service to extend the shoulder seasons of the Park, then we suggest that Mary Glacier Hotel and Lake McDonald Hotel remain open later, even partially, and that the small units close earlier. This would definitely give the impression to the traveling public that the park is open, much more than having Swift Current, Rising Sun, or Applegate Village as available facilities. If the concessionaire were required to keep these larger facilities open, it might prompt them to start promoting business for these additional periods of operation, which would benefit the entire park economy.

6. **Mary Glacier Plan** – We are very opposed to turning the dorm, on the entrance to Mary Glacier, into additional standard, high, and deluxe rooms. It would seem that turning this dorm into a hotel-type facility would accomplish two goals. First being that the concessionaire would be providing accommodations for the less affluent traveler and the second should preclude the necessity of expanding the accommodations at Swiftcurrent. I believe this was one of the

3. See comment #318, response #1. The proposed increase would only be a maximum of 28 parkwide over the existing room count. The impact analysis indicates this would have a negligible to minor impact on the local and regional economy.
4. Thank you for your comments. Within the proposed range of dates, we would continue to examine the operating dates on a year-to-year basis to determine what would be appropriate given resource concerns about wildlife, weather, staffing, funding and facility condition. Furthermore, these dates represent the earliest and or latest times during which these facilities could operate.

Comment

Response

St. Mary Lodge & Resort

proposals that the concessionaire promoted previously, when they were talking about the upgrading Many Glacier Hotel.

We also do not think it is proper to use taxpayers money to upgrade the interiors of the existing hotel that presently belongs to the concessionaire, who is competing directly with the facilities adjacent to the park. We realize that value of the possessory interest will be reduced on a dollar-for-dollar basis at the time of sale, for money spent on the restoration. This does not address the increased appraised or market value that will occur, once those improvements have been completed. In addition, the additional dollars generated to the concessionaire, due to this upgrading, are not considered in this formula. We feel that any interior improvements that are cosmetic, non-structural, or non-life-safety, should be funded by the owner of the facility, not tax dollars.

7. **Switzerland** – We disagree with the preferred alternative that promotes additional new facilities that add to the existing room base as being necessary and appropriate. This seems to be contrary to what the NPS has been promoting for many years. We have been communicated that any new guest facilities would be encouraged outside the park boundaries. We also feel that the owner of the property should be financially responsible for any improvements to those facilities.

8. **Rising Sun** – Again, we are strongly opposed to any increase in the room base at Rising Sun, because of the close proximity of the many different facilities in the St. Mary area. We do not feel that these are “necessary and appropriate” additions, given the quality and choice of accommodations located in the near vicinity.

We see no necessity in the expansion of the existing coffee shop, unless the thinking was that it is necessary to accommodate the additional new units, proposed in your preferred alternative. There are five eating establishments in St. Mary, only six miles from Rising Sun – one that seats 275 people. Expanding the existing facility would take the building out of its existing footprint and provide the concessionaire monopoly another advantage. They have previously used their control over the park transportation to unduly influence tours into stopping at Rising Sun for meals. These tours had booked previously into the facilities located in the St. Mary vicinity. Expanding this facility only gives the concession additional leverage and is absolutely unnecessary, considering the quality selection of options that guests have within the immediate area.

9. **Guided Backpacking Service** – At the present time, the Park has only one concessionaire providing all the day hike and backpacking services inside the park. It would seem reasonable that those who provide a service, that does not require large capital investments, not be given exclusive rights for that service. It would seem logical to have a concession based on the East side of the park, where the majority of the hiking trails are located. This should result in better service and quality for guests visiting the park, because of competition. I would also suggest that you encourage Blackfeet interpretive hikes on the East side of Glacier. These would be much more in tune with the spirit of the Glacier National Park than establishing underwater-guided tours.

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5. The current concession contract values the concessioner's possessory interest as reconstruction cost less depreciation, not to exceed fair market value. Since the cost of the government's investment would be deducted after the possessory interest value is established, we feel the market value would be taken into consideration. As holders of the title to the national historic landmark Many Glacier Hotel, the National Park Service has a responsibility to ensure its preservation. All the National Park Service capital improvements are intended for the long-term preservation of the structure and to address life safety and accessibility issues. The concessioner would still be responsible for cyclic and cosmetic improvements.
6. See the response above.
7. Determinations for the appropriate number of commercial operators providing a service are not necessarily tied to large capital investments. For example, it was determined in the past that one backpacking guide operator was appropriate at Glacier National Park. This determination was based on the limited number of backcountry camping sites, and the desire to limit the number of sites that are booked by a commercial operator versus independent park visitors. In this way, a park-based service is provided to the visiting public, and a reasonable opportunity is provided for the concessioner to make a profit. The commercial services plan does identify expanded opportunities such as guided cultural and natural history hikes. The National Park Service would be happy to consider offers from qualified tribal members for these additional services, although at present, we have no authority to give preference to any specific group.

Comment

Response

St. Mary Lodge & Resort

8

I present this letter in the spirit of creating a better experience for all guests visiting Glacier National Park. It represents the concerns and thoughts of our entire family as well as the members of our corporate management staff. Having been born and raised in the Glacier Park area, I have strong concerns about the total guest experience in this beautiful natural resource. We know that the monopoly status of the concessionaire is not part of this plan, but we heartily encourage the Park Service to seriously consider creating competition within the park, similar to that of Yellowstone National Park. We sincerely hope that this letter is helpful in determining the Commercial Services Plan, and I look forward to working with you on the final draft.

Sincerely,

Roscoe Black
Managing Director

8. Thank you for your comments.

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July 29, 2003

Superintendent Helm
Glacier National Park
West Glacier, MT 59936

re: Draft Commercial Services Plan

Dear Team Members,

Commercial enterprises close to and bordering Glacier National Park depend on your federal agency working closely with the private sector. I am a true believer that governmental agencies should not offer services that private enterprise can provide. This plan is attempting to allow some private companies to perform services to visitors, which is exactly the direction the National Park Service should be going. Let the private sector make some money, pay the taxes and support the government. Without private enterprise there would be no government.

Additional comments to the plan:

ES1-Enjoying the park from many vantage points should continue. The clearing of brush and trees along Lake McDonald is a big step in furthering this idea. It should continue all along Going-to-the-Sun Road since car travel with sightseeing is the primary reason that visitors come to Glacier Park.

ES8- Seems strange to me that GNP would promote motorcycle tours and be against overflights by helicopters. Have you been on Logan Pass when a helicopter was overhead? How about when forty Harleys drive up the road? Which one is more appealing? My guests will choose the helicopter every time!

1 ES9-Does the alternative B mean that the taxpayer would foot the bill for another million dollar toilet??

ES11-Shower facilities are really needed in the campgrounds of Glacier Park. I would assume that these would be pay showers and not give aways as part of a camping fee.

2 ES12-The parkwide transit system which is suggested should NOT supplant individuals driving their own vehicles. The park SHOULD limit the number of hours a vehicle could be parked at Logan Pass since this is the destination from both sides. Hikers should not be allowed to occupy a parking spot for days until they return from their hike.

ES13-Like I said in ES8---limits on motorcycle group sizes (and decibel levels) seem more practical than this approach, even though I like the idea of a guide for the groups.

3 I would also like to know the status of a future visitors' center at the 'T' of Going-to-the-Sun Road and Camas. Is the project on schedule...when, exactly where, etc.

Thanks for listening to my suggestions on the commercial services plan. As you can read through my comments I believe Glacier National Park should provide many visitor services but NOT be in competition with private enterprise at taxpayer expense.

Sincerely,

Dee Brown
Dee Brown, Owner

 ORIGINAL



Comment #344 (Canyon RV & Campground)

- Improvements under any of the chalet alternatives would be funded by the federal government or private fund-raising efforts. The National Park Service is very concerned about costs. However, the public has been very vocal about its desire for the chalets to remain open. It would be expensive to provide and maintain the wastewater treatment and toilet facilities for the backcountry hotel at the necessary capacity while minimizing impacts to the environment. Even if the chalet were closed, the toilet facility would continue to handle a large volume of waste from day hikers (an average of 300+ per day). We will continue to consider ways to reduce the cost of the systems.
- Parking regulations are not within the scope of this commercial services plan. Your concerns will be considered when the park considers parking issues at locations such as Logan Pass. We have no intention of prohibiting private vehicles on the Going-to-the-Sun Road. A transit service will be voluntary, although it may include incentives for visitor use. A reduction in the amount of time vehicles may park at Logan Pass could be implemented without its inclusion in this plan.
- Construction of the west side visitor center is beyond the scope of this plan. The location for this center was determined in the 1999 General Management Plan and analyzed in the Going-to-the-Sun Road 1999 General Management Plan. It was analyzed further in the Going-to-the-Sun Road Rehabilitation Plan in conjunction with the mitigation of transportation during road reconstruction. Currently, the park has been developing a conceptual design, but there is no funding available for this project. The park is exploring private efforts to raise the necessary funds to construct the center. No time schedule is available at present.

#345



NATIONAL PARKS CONSERVATION ASSOCIATION*

Protecting Parks for Future Generations*

July 30, 2003

Superintendent Mick Holm
Attn: DCSPIDEIS
Glacier National Park
West Glacier, Montana 59936



Dear Superintendent Holm,

The National Parks Conservation Association appreciates this opportunity to comment on the Glacier Draft Commercial Services Plan and Draft Environmental Impact Statement. NPCA is the only national, non-partisan advocacy organization exclusively devoted to protecting the national parks. Today, we have more than 300,000 members nationwide.

NPCA is in general pleased and in agreement with much of the direction currently defined within the draft's preferred alternative. Glacier National Park is the premier wilderness park in our nation, and the dedication of Glacier's management team to preserve and maintain the park's wild natural values is of the highest level. We commend you and your staff for your work and dedication. As we all know, commercial services in our national parks are a two-edged sword. There is a need to provide visitors with essential services as well as interpretative and informational opportunities. At the same time, it is incumbent upon the National Park Service to establish policies and procedures that do not allow the commercial presence to impair, degrade, or otherwise blight the values upon which a park has been established and set aside. This holds especially true for the wild Glacier National Park, and thus makes this Commercial Services Plan an especially important one for the park's future.

We would like to submit comments on several areas of the plan that we feel would benefit from some modifications, while at the same time acknowledge the appropriate direction established in other elements of the plan.

Issues Considered Beyond the Scope of this Plan

Commercial Air Tours – We believe that the Commercial Services Plan represents a premier and appropriate opportunity for GNP to unequivocally reiterate its position regarding commercial air tours over the park as established in the Glacier General Management Plan. We would urge the Park to:

- 1) Request that the FAA prohibit all new scenic air tour operators who would operate over Glacier National Park.
- 2) Develop a plan with the FAA and the public to phase out current commercial operators over time to end all commercial sightseeing tours over Glacier National Park.

Behavior by the Federal Aviation Administration in recent years since the passage of the Air Tour Management Act demonstrates that the agency is reluctant to cede authority to NPS in regulating and governing air traffic over national parks, despite the clear intent of Congress in passing this legislation to allow NPS to occupy an equal role in determining such policies. Given FAA's foot-dragging to complete the rule making process on this Act and its reluctance to involve NPS in air tour management decisions, in our view Glacier should stake its ground firmly and unequivocally in preparation for the upcoming Air Tour Management planning process for the park – within which it is expected that Glacier will be one of

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Comment #345 (National Parks Conservation Association)

1. See response to comment #340.

Comment

Response

1 the initial parks to adopt such a plan. The park has clearly stated its intent vis-à-vis this issue through the GMP, and it would be inconsistent of the park to not reaffirm it through this process. As such we believe such a reaffirmation of existing GMP policy is well within the Commercial Service Plan scope and should be added.

2 **Monopolies Held by Concessioners** – NPCA believes that whenever possible, commercial services within a national park unit should be diversified among multiple vendors. We recognize that sometimes this cannot be the case. However, competition not only in the bidding process but also in the operations of a service offered to the public will undoubtedly result in a higher quality and a greater diversity of product. This is a public policy issue that appropriately should be addressed in this plan. NPCA believes that competition, coupled with rigorous quality controls, is healthy and beneficial both to the park resource and to visitors. We recommend that the final Commercial Services Plan closely analyze all services that currently have a single vendor providing that service in Glacier, and that GNP look to adopting systems and policies that provide visitors with a broader array of vendor choice and options. Choice and competition can bring higher quality services and lower prices, especially when coupled with on-going standards for performance review established contractually by the park.

3 **Concessioner's Possessory Interest** – While the decision for the government to buy out GPI's possessory interest in park lodges may be outside the scope of this plan, we believe that the plan should clearly state the interest of the National Park Service to bring the hotels, lodges and other buildings used as commercial facilities into public ownership.

Granite Park Chalet

We strongly support the preferred alternative to maintain Granite Park Chalet as a hiker's shelter with upgrades to the water and toilet systems. This level of service is more fitting with the alpine backcountry wilderness of the park, whereas the full-service option cannot be regarded as an essential services, especially given the fact that the full-service option remains at Sperry Chalet.

The hiker shelter system has worked very nicely at Granite Park Chalet, and it has been popular with visitors. A hiker shelter provides an important and affordable alternative for overnight hikers who choose not to camp and who cannot afford the expensive, full-service option of Sperry Chalet. Our experiences at Granite Park Chalet have been positive.

The preferred alternative not only is much more affordable for visitors than Alternative C (the full-service option), but it will have less environmental impact and will be less expensive for taxpayers.

We take issue and disagree with a number of critical characterizations offered by some interests in regards to Granite Park's current management structure, protocols and standards. For the record we would offer that these allegations come from the same private group who pledged to raise \$1 million in private funds for restoration of the backcountry chalets, who used this pledge to secure several matching congressional appropriations, then failed to deliver more than a tiny fraction of the private pledge. This past track record, while certainly not disqualifying this interest from expressing their opinion on this issue, certainly sheds a light of skepticism on their current preferred direction for management of this chalet.

Guided Day Hiking

4 We support the proposed restrictions on group size under Alternative B, and we believe the same limits should be placed on interpretive hikes led by Glacier's own rangers.

2. We agree that competition for and among concessioners could be healthy and have a positive effect on the quality of the visitor services. However, the National Park Service must consider whether there is sufficient demand and opportunity to support the services it wants to assure would be available to the public. Multiple operators who fail economically would serve no one. Likewise, engaging multiple operators who would not make services available to the park visitor on a steady basis or who might cause other concessioners to fail do not serve the park well, either. For those reasons, each contract must be considered individually. Including these decisions in this 20-year plan would commit to a specific number of operations that might be unsupportable in the future and cause the unnecessary complication of an amendment or reissuance of the plan. For these reasons, it has been determined that choosing the correct type of authority and number of operations is beyond the scope of this document. Decisions related to the appropriate number of concessioners for specific services are based on financial feasibility and are considered beyond the scope of this plan.
3. While this suggestion has merit, the decision to seek and ability to obtain funding for government buy-out of the concessioner's possessory interest would occur outside the scope of this planning effort.
4. See comment #141, response #1.

Comment

Response

	<p>We support the concept of expanding the scope of guided day hiking to include authorization for cultural and natural history hikes.</p>	
5	<p>At the same time, we strongly believe that the expansion of guided day hikes should not be used as a justification to diminish interpretive hikes provided directly by the Park Service. We are concerned about national trends of commercializing and privatizing national park services historically provided by NPS employees, and we don't want to see this situation emerge in Glacier. The need to double the amount of allowable day-hike user days to 5,000 annually over the recent six-year average (as proposed in the draft) is not supported by any offered documentation regarding demand. Whereas such an expansion may be important, we do feel that it must be accompanied by clear and compelling data supporting such a move. To that end, therefore, we would like to see the Final EIS provide two data trend lines which we feel would either support such an expansion or lead to a determination that it is not needed. 1) How many guided day hikes have Glacier rangers provided annually since 1990, ideally as measured by user days as well as actual number of hikes? 2) How many commercially guided hikes (as measured by user days and actual number of hikes) have concessioners provided annually since 1990. Here we're particularly interested in the range of annual user days, not just the 1995-2000 average.</p>	5. We agree. We do not wish commercially guided hikes to replace National Park Service naturalist-led hikes, since they are part of the valuable interpretive education the park offers the public. The National Park Service does not intend to reduce the number of naturalist-led hikes it currently offers. However, the number of hikes is a function of operating budgets and cannot be guaranteed.
6	<p>Our earlier comments above regarding multiple vendor choices for a type of service take traction in this discussion regarding guided day hikes. We suggest the draft be clarified to state that more than one commercial guide service will be provided permits-to-offer this service within an overall cap. We remain open to whether this should occur on a guide permit basis or whether it should be restricted to just a few operators.) In either case, we strongly urge the park to mandate that guides be required to participate in a Glacier-specific training program and a system should be established to ensure that services are of the highest quality and that information provided to visitors is accurate and current.</p>	6. The National Park Service is seeking to expand opportunities for commercially guided cultural and natural history hikes. The annual cap established in this plan would allow for growth in all commercially guided hikes at a level that was determined to be acceptable. Figures for Glacier National Park-led hikes annually are: in 1999, 19,521; 2000, 15,296; 2001, 15,781; 2002, 14,900; 2003, 10,319. The number of annual commercially guided day hikes by our hiking concessioner ranged from 85 in 1990 to 2,852 in 1998. From 1992 to 1999 there was a 615% increase in the number of guided day hikes.
7	<p>Guided Underwater Diving Tours – We believe the proposal to offer this new commercial service has merit, and we support this added service at Lake McDonald, Shurburne, Josephine, Swiftcurrent and St. Mary Lakes. However, we do not support providing this service in the Two Medicine Valley. The General Management Plan states that the two Medicine area would be managed to protect the wild character of the area. As the GMP states, "While Two Medicine is a developed area, it would remain small and would not provide all services." We agree that Two Medicine should maintain lower levels of commercial services than other front country areas. Underwater diving tours are not an appropriate use in Two Medicine.</p>	Our operation plans for concessioner services require specific training on Glacier National Park policies and issues such as working safely in grizzly bear country. We ensure that the companies who contract with us to provide commercial services in the park deliver high quality services and present accurate current information on the park to visitors.
8	<p>Firewood Sales – We support the proposal to allow on-site firewood sales. Special consideration for providing this service should be given to the Blackfoot Tribe, which already has initiated efforts to sell firewood to park campers. Any firewood concessioner should be required to provide only dry, seasoned firewood. We have experience with sales of green, unseasoned firewood in Canadian parks that create excessive smoke and air pollution in campgrounds.</p>	7. The alternative to exclude guided underwater diving tours in Two Medicine was considered but rejected. Please see this section of the <i>Final CSP and Final EIS</i> .
9	<p>Public Shoreline – The preferred alternative is reasonable.</p> <p>Boat Tours – The preferred alternative is reasonable and acceptable with the possible exception of adding tour boats at Two Medicine Lake. We would question why this is regarded as necessary and appropriate, especially given the relatively small size of the lake and the GMP direction that Two Medicine should be less commercialized than other front country areas in the park. Unless the final plan provides more compelling justification for expansion of this commercial service at Two Medicine, we urge the park to alter the draft and eliminate this provision.</p>	8. While we would encourage offers from tribal members, the National Park Service does not have the authority to provide preference for any group awaiting concession contracts. We would include your suggestion to require the concessioner to provide only dry, seasoned firewood in any operating regulations for these authorizations.
		9. Adding a second vessel does not conflict with the General Management Plan and the environmental impacts were determined to be minor to moderate.

Comment

Response

Guided Interpretive Motor Vehicle Tours and Public Transportation Service

Motor Vehicle Tours – It's unclear whether there are any differences between the two alternatives. Are motor vehicle tours currently provided on the Camas Road? We don't object to motor vehicle tours on the Camas Road, but it should be stipulated that these tours remain on the paved Camas Road and not utilize the county's gravel North Fork Road. We believe the North Fork Road outside the park is not an appropriate road for commercial motor tours, both from a visitor experience viewpoint and because it could contribute to greater commercialization and development of the North Fork Valley. If this cannot be stipulated in a park contract, then the park should not authorize motor vehicle tours on the Camas Road.

Taxi Service – The preferred alternative indicates that operating restrictions would be changed in a few years to allow for expansion of services. This proposed expansion should be made more explicit. What services would be expanded and why? Also, please clarify the nature of a taxi service that is allowed on Camas Road. By definition, a taxi service essentially is a delivery service, not an interpretive opportunity or a hiker shuttle. What delivery services are needed along Camas Road?

Private Vehicle Shuttle – The preferred alternative is reasonable, but we do not believe it should allow for commercial shuttling of private vehicles to trailheads in the Going-to-the-Sun corridor between Avalanche Creek and Sunrift Gorge and especially not at Logan Pass, due to chronic problems with parking lot congestion. Hikers should be encouraged to utilize the hikers shuttle service.

Public Transportation Service – We agree this system should be considered in a separate parkwide transit plan. We urge the park to immediately begin developing a Shuttle Implementation Plan for shuttle service during the Sun Road rehabilitation period, with an eye toward options following reconstruction.

Horseback Riding – We support the preferred alternative.

Guided Bicycle Tours – The park should provide increased opportunities for bicycle tours, including both private and commercially guided bicycle tours. We do not support the proposed restrictions on guided bicycle tours. We understand the safety concerns discussed in the draft EIS, but we believe there are better ways to address issues of transportation safety and congestion. Since this plan will be used to guide commercial services for the next 20 years or more, we include here some of NPCA's comments on the Sun Road DEIS, which provide suggestions for both public transportation service and bicycling opportunities.

NPCA envisions a future transportation system that increases visitor transportation options over the currently skewed reliance on private vehicles. While increasing visitor choices, this system should reduce traffic and parking congestion, thereby freeing park resources that are currently expended to resolve such congestion (such as the ill-fated plan to cut down ancient cedar trees to expand parking at Avalanche or the rangers who serve as peak-season parking cops at Logan Pass). We advocate an affordable (or free), attractive, distinctive, convenient and frequent shuttle system that provides transportation service on the Sun Road, connecting to Mary Glacier, Two Medicine and integrating with better public transportation to the park from gateway communities. In addition, the Sun Road could be a world-class bicycle destination, providing an outstanding way for Sun Road travelers to experience the park with all of their senses. We believe a transportation system should significantly increase biking opportunities.

Among the transportation system options that we would like to see explored would be establishment of a car fee that would be assessed to visitors who choose to drive their

10. Motor vehicle tours are not currently offered on Camas Road, but they could be, with the stipulation that vehicles would not be allowed on the inside North Fork Road.
11. Once the contract with the current transportation concessioner expires, their right to provide exclusive transportation in the park expires. The park could then decide if it wants multiple operators providing multiple services. A commercial operator might or might not provide taxi services on the Camas Road; it is merely an option in the commercial services plan.
12. The alternative to restrict commercial shuttling of private vehicles from Logan Pass or the corridor between Avalanche Creek and Sunrift Gorge was considered but rejected. Please see that section in the *Final CSP and Final EIS*.

Comment

Response

own car. This fee (probably between \$5 – 20) could be used to subsidize an appropriate shuttle system. Instead of subsidizing private cars (by expanding parking lots and hiring parking cops) with taxpayer dollars, this plan would create a free-market choice in which private vehicle drivers would support a shuttle system to reduce congestion. A variation on this basic approach would limit private vehicles to one-way travel on the Sun Road on alternate days, freeing one lane of traffic for shuttle buses and bicycles, which could travel in either direction. We believe this approach would increase visitor choices, improve visitor experience, reduce wear and tear on the road, and better protect natural and cultural resources.

Stop an Guide Service – We support the preferred alternative.

13

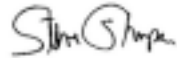
Guided Motorcycle Tours – We oppose this proposed expansion of commercial services. Too many motorcycles currently operating in the park are excessively loud and disruptive the park soundscape and visitor experience. If guided tours are permitted, a quality control system should be put into place to ensure that all motorcycles in a tour group have adequate mufflers and other sound control equipment.

14

Developed Area Plans – We have reviewed the developed area plans for Apgar, Two Medicine, Many Glacier, Swiftcurrent, Rising Sun and Lake McDonald, and we support the preferred alternatives for these areas. We have tended to be supportive of earlier proposals to move the Village Inn, but in light of the additional environmental and cumulative analysis in this DEIS we are willing to support the preferred alternative for Apgar Village. Also, we would like to reiterate our request to be involved in discussions and planning efforts for the new Westside visitor center and transit staging area in Apgar.

Thank you for this opportunity to share our comments on the Draft Commercial Service Plan.

Sincerely,



Steve Thompson
Glacier Program Manager

Glacier Field Office
National Parks Conservation Association
PO Box 4485
Whitefish, MT 59937



Terry Jewett
Senior Regional Director

Northern Rockies Regional Office
National Parks Conservation Association
PO Box 824
Helena, MT 59624

13. See response #30 in Grouped Responses to Individual Comments.
14. We will keep in touch regarding further discussions and planning efforts on the new visitor center and transit staging area.

385



Bicycle Coalition of Maine

Safety • Education • Access



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League of Cities, Villages

Paul Thibault
Maine Tourism Authority

Dear Superintendent Mick Holm,

I had the great pleasure of biking into Glacier National Park and over the going to the sun road. In fact the trip to Glacier was the primary goal of a 2,100 mile bike tour I made through the Pacific Northwest and I was not disappointed — Glacier is a gem of a park and I look forward to returning again with family and friends.

As someone who worked in a National Park (Acadia), I appreciate the various pressures park managers must struggle with. However, there is one point I hope I can encourage you to appreciate. Bicyclists are the ideal visitor to National Parks because they cause no wear and tear on the roads, do not pollute the air, are a week up enough of an appetite to eat for several folks at the concessions. Your wonderful hiker/biker campsites also demonstrate the significantly lower impact that bicyclists visiting national parks cause compared to other park visitors. I strongly urge you to invite and welcome bicyclists, not restrict them as I understand Alternative B of the Draft Commercial Services Plan and Environmental Impact Statement suggests.

My own experience climbing over the Going to the Sun road in early August 2001 was mostly pleasant, the one deterrent was having a time restriction hanging over my head that kept me from taking as many breaks at various vistas and soak up as much splendor of the park. I also remember passing one retired gentleman who was very concerned about not making it to the top by the 11am restriction (he didn't) and whether he would be picked up by a ranger (fortunately he was allowed to finish the climb). I assure you that nearly every bicyclist has their visitor experience impacted by the time restrictions.

The ban on bicycles at peak hour seems highly ironic to me considering that bicyclists take up 1/10th of the space of a car and just a fraction of that compared to an SUV or large RV. It seems pretty straight forward to me that if you have a congestion problem you put restrictions on the larger vehicles that are causing the real problem, not ecotourists who are low impact.

I appreciate your attention to my comments and ask that you keep me apprised of the next draft of the plan.

Sincerely,



Jeffrey Miller
Executive Director



P.O. Box 5275, Augusta, ME 04332 • (207) 623-4511 • BCH@BikeMaine.org • www.BikeMaine.org

Comment #385 (Bicycle Coalition of Maine)

1. The National Park Service is not proposing to restrict visitors who choose to bicycle on park roads. The proposal would limit the size of commercially guided bicycle groups who ride the Going-to-the-Sun Road or elsewhere in the park at one time.

Comment

Response



GLACIER WILDERNESS GUIDES
MONTANA RAFT COMPANY

#391

Superintendent
Glacier National Park
West Glacier, MT 59937

August 15, 2003

Re: Commercial Services Plan

We would like to take this opportunity to comment on the Commercial Services Plan.

Guided Day Hikes:

We strongly agree that the group sizes should be limited, however we feel that these limits should be carried over to all hiking parties, not just commercially guided groups, to also include; the NPS guided naturalist hikes, non-profit groups, educational, or whatever they may call themselves.

I am somewhat confused by the group size prescription. If I am correct in reading that the only trails allowed more than 12 people at a time are the ones listed, then this would impact our business significantly. We currently operate with groups of up to 30 including clients and guides on the trails listed below and would like to continue to do so.

Boundary Trail
Autumn Creek/Firebrand Pass
Siyeh Pass
Pegon Pass
Swiftcurrent Look Out
Grinnell Glacier Overlook
Swiftcurrent Pass
Appokuni Falls
Granite-Highline to Ahern Pass
Loop Trail
Cohalt Lake
Dawson Pass
Two Medicine Pass
Scenic Point
Kootenai Lake

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ORIGINAL

Comment #391 (Glacier Wilderness Guides/ Montana Raft Company)

1. See response to comment #141.
2. After reviewing public comments, we became aware of the need to modify the hiking trail list in the preferred alternative to address some omissions and discrepancies, and expand opportunities. Please see the revised text in Chapter 2, Guided Hiking, of the *Final CSP and Final EIS*.

Comment

Response

2

We would feel that 30 people maximum would be reasonable on these trails. If you would like more info on our numbers that we currently run, please take the time to look at our past visitor use numbers submitted to the concessions office for each month of use. I think the impacts would be significant if you limited us to only a few specific trails that we were to always use for larger groups. We currently are trying to spread that use out and have done so with some encouragement from Park staff.

Currently our guided Hut Hike in at Granite Park Chalet uses day hikes from the Chalet. Those group numbers can be as much as 18 on our regular trip. We also have a hike and raft trip that we hike the boundary trail from West Glacier to Lincoln Creek.

We would prefer to see the ruling written a little more open ended with something that limits group sizes but we can then choose trails that we feel we can access in a day. The limit of one trip per day outside the day use zone would be a definite hardship for us if Alternative B is chosen as is and not edited to address the above issues.

3

We feel if you are planning on restricting use in the North Fork management area, be sure that encompasses all types of groups as well to include educational, non-profit, etc. once again not just commercial.

4

The 5,000 user day cap is unclear as to whose cap it is. Would that be all guided day hikers including NPS naturalist led, Glacier Institute, Glacier Wilderness Guides, etc or do each of those entities get 5,000 per season? Also does that include the jammer tours at Trail of the Cedars, boardwalk to Hidden Lake, etc?

Private Vehicle Shuttle:

The areas least accessible now are Kintla and Bowman Lakes for those backpackers wanting to hike the northern traverse. We realize that you wish to limit activity in the North Fork but the activity is already limited with the backcountry sites permitted. We don't feel this would add much use to the area. The majority of the calls that we get to accommodate a shuttle are people wanting this specific shuttle and it is our understanding that they are hiring locals when they arrive in the area to do the job. You may as well make it legal.

Guided Bicycle and Horse:

Agree with preferred alternatives on both.

3. We work with the Glacier Institute, a local non-profit educational organization, on a case-by-case basis to determine which activities are appropriate in the North Fork. To be considered appropriate, the activity must serve specialized audiences and complement the interpretive services the National Park Service provides, while protecting a unique area of the park. We have set a cap (5 trips per year and 12 per group) on the number of trips that Glacier Institute may take in the North Fork. They are not permitted to use the lakes in the North Fork. In addition, this plan deals strictly with commercial opportunities. As noted in "Beyond the Scope," the activities of our cooperating association are reviewed under a Cooperative Agreement
4. The preferred alternative in the commercial services plan would set an overall cap of 5,000 user days on all trails parkwide for the year; this cap would be an annual limit set for all *commercially* guided hikes. The limit would apply to all guided day hikes other than hikes led by National Park Service interpretive staff and cooperating associations. The text under Necessary and Appropriate has been modified to address this confusion. Regarding your question about red "jammer" bus tours that stop and allow customers to go on short walks on popular trails, the National Park Service has determined that certain stops with short walks are not considered commercially guided "hikes."

Comment

Response

5

Commercial Step-on Guides:

We would like to be able to offer this service as we get many folks that request it that do not want to ride with a large group on the buses, want to customize their departure time as we do with our custom day hikes, and are unable to physically hike. Therefore listing this as an alternative but keeping it restricted from the heart of the Going To the Sun Road is too restrictive. Why bother. No one wants to hire an interpreter to ride from West Glacier to Lake McDonald Lodge or St. Mary to Rising Sun.

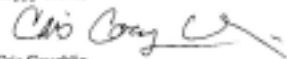
Granite Park Chalet:

We agree with Alternative B, the preferred alternative. It provides a lower cost alternative that our guests enjoy. I would like to rebut a few comments made at the Public hearings in June. There was a comment made in reference to alcohol use in excess at the Chalet. As the current operator of the Chalet we have never received a single comment or complaint to that affect. People have to hike in what they want to drink and so that takes care of excess right there. Another comment suggested that the kitchen was unsanitary and appalling. We are under the NPS directives on how we run the kitchen and we always pass our inspections. We are not sure what they were referring to. Another complaint was if it went to full service there would be well educated interpretive staff at the Chalet. Most of our rotating staff are interpretive guides. Once again, we're not quite sure what they were referring to.

We have enclosed some of the customer comment sheets from Granite from the past few years. We only copied the side with the question, "Is there anything you would like to see added or changed".

Thank you for giving us this opportunity. If you have any questions of us please feel free to contact us.

Happy Trails,



Chris Coughlin
Glacier Wilderness Guides
PO Box 330
West Glacier, MT 59936
406-387-5555
info@glaciarguides.com

5. The *Draft CSP and Draft EIS* states that Commercial Step-On Guide Service would not be authorized in the North Fork area except for the Camas Road. All other park roads would accommodate this service.

Comment

Response

#429



Jan Knox
08/22/2003 12:44 PM
MDT

To: Connie Stahl@GLACNPS@NPS
Cc:
Subject: Concession changes

Connie - please include this with the comments on the CSP. Thanks...

Jan E. Knox
Chief Concessions Management
Glacier National Park
(406) 885-7908
(406) 885-7904 Fax
--- Forwarded by Jan Knox@GLACNPS on 08/22/2003 12:44 PM ---



"alan@back"
swanriver@bigplanet.com
swanriver@bigplanet.com
08/22/2003 11:03 AM
CST

To: Jan_Knox@nps.gov
Cc: Swan@bigplanet.com, River@bigplanet.com, Tours@bigplanet.com
Subject: Concession changes

Hello Jan,

Thank you for allowing me to comment of concession operations in Glacier National Park. My comments will be restricted to hiking and touring through the Park.

As Montana's only certified tour director and owner of Swan River Tours, I anticipate using the Park a few times each summer for short hikes, day hikes and traveling the Going to the Sun Road. In all these activities, I am required to use the services of Glacier Wilderness Guides of West Glacier, Montana.

My tours, hiking and stops in the Park are of high quality in regards to interpretation and style. I have found that N.W.G. do not stand up to my style of operation or quality. I have had to use inferior guides from this company and to sustain harassment from the owners regarding my time in the Park. I do not wish to turn over my program to immature, unqualified people from this company when I can do it myself and in my own style. Some of their staff, however, are professional and well qualified; others are "grabbed" when needed.

Anyone can watch a bear film, attend one park session on bear management, and get a first aid card to qualify to work for this company. Not everyone can provide quality National Park experiences and style like I can for my company.

Please consider changing the rules to allow other company's or individuals to provide for these guest services.

Sincerely,

Al Cluck
Swan River Tours

ORIGINAL

Comment #429 (Swan River Tours)

Thank you for your comments.

Comment

Response



BLACKFEET NATION

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September 23, 2003

Mike Holm
Superintendent
Glacier National Park

RE: TRAIL RIDES IN GLACIER NATIONAL PARK

Dear Mr. Holm,

I am writing this letter in the spirit of cooperation. Recently, tribal members have approached me with a concern that involves Glacier National Park. Apparently, GNP provides trail rides and one person runs that franchise for the entire Park. On the outside of GNP is the Blackfeet Reservation and there are trails that start on the Reservation and go into the Park. It has come to the attention of tribal members that GNP has come up with a twenty year plan whereby horses will be transferred from Apgar to the outside of the Park for the purpose of providing trail rides to tourists. The Blackfeet Tribal Business Council supports our tribal members and would like you to consider utilizing the Native American resources on the east side of the Park. It is a common sense and cost efficient proposal for GNP to hire Blackfeet Tribal members as they are knowledgeable about the area and could also provide important history about the area to tourists.

At this time GNP has not hired or allowed Blackfeet outfitters access to any of the several trails adjacent to the Blackfeet Reservation. Glacier Park Inc. has a package deal that offers tourists golfing, rides in the windjammers and trail rides. GPI has employed a Blackfeet Tribal member, Truman "Mouse" Hall, to provide these trail rides. Mr. Hall has a problem because he can only take these tourists to the park boundary and then has to turn around. If GNP would allow access to trails that are not being utilized by your franchise provider it would prove to be beneficial not only to the Blackfeet tribe but also to Glacier National Park.

ORIGINAL

Comment #432 (Blackfeet Nation)

1. The preferred alternative does not specify that the horse concessioner would be required to travel to the east side from Apgar.
2. The National Park Service has considered these comments and has changed the preferred alternative to address some of the tribe's concerns. The preferred alternative is now a modified version of alternative C and would allow rides on selected areas in Two Medicine.

Please refer to page 1-10 of the *Draft CSP and Draft EIS*. The National Park Service does not have the legal authority to contract exclusively with any one population for commercial services. While the park will continue to provide employment opportunities to individuals and concessioners will be encouraged to hire locally, developing economic opportunities specifically for the Blackfeet Tribe is beyond the scope of this plan.

Response

Comment

These are issues that I urge you to seriously consider. If you would like to meet and discuss anything please feel free to contact me at 406-338-7276 extension 204. Thank you for your consideration in this matter.

Sincerely,


 Jay St. Goddard
 Chairman
 Blackfoot Tribal Business Council