

Appendix D

Comments and Responses on the Draft Environmental Impact Statement

The Going-to-the-Sun Road Draft EIS was released to the public for a 60-day comment period in September 2002. In addition, the NPS held a series of five public hearings in October 2002 in Montana at Missoula, Kalispell, Great Falls, Browning, and at Lethbridge, Alberta, Canada to allow public input on the proposed rehabilitation plan and alternatives. Over 250 written and oral comments were received on the DEIS. This Appendix addresses the substantive comments. Comments, as defined in NPS-12 and NEPA Compliance Guidelines, are considered substantive if they:





- ❑ Question, with reasonable basis, the accuracy of the information in the document
- ❑ Question, with reasonable basis, the adequacy of the environmental analysis
- ❑ Present reasonable alternatives other than those presented in the environmental impact statement
- ❑ Cause changes or revisions in the proposal

Comments and responses are divided into two sections. The first section includes copies of the substantive comments made by government agencies, organizations, and businesses. Beside each reproduced letter is the numbered response of the National Park Service corresponding to each specific comment. The second part of the response to comments includes a summary of additional substantive comments made by the general public or other entities. Many of the comments made by the public were similar to the range of issues and concerns that are addressed in the first section. Rather than print every letter from individuals, we have summarized the additional comments received and have addressed these with specific responses. The summary of comments from individuals broadly fall into three categories: alternatives and visitor use improvements; mitigation; and transit. All letters and hearing testimony received are available for public inspection at Park headquarters in West Glacier, Montana.

Where appropriate, the text of the Final EIS has been revised to address comments.


Agency, Business, and Organization Comments



Montana Contractors' Association Inc.	D-3
Montana Historical Society	D-4
United States Environmental Protection Agency	D-5
Sun Tours	D-15
National Parks Conservation Association	D-17
Montana Wilderness Association	D-22
United States Department of the Interior	D-23
U.S. Department of Transportation	D-25

Comment #	Letter #15	Response
1	<div data-bbox="331 297 1060 358">  Montana Contractors' Association Inc. <small>A Chapter of the Associated General Contractors of America</small> </div> <div data-bbox="787 334 1045 354"> Cary Hegberg, Executive Director </div> <div data-bbox="338 380 468 399"> September 20, 2002 </div> <div data-bbox="338 433 602 505"> Superintendent, Glacier National Park GTSR/DEIS, Project Management Office Glacier National Park West Glacier, MT 59936 </div> <div data-bbox="338 519 443 539"> Dear Mr. Holm, </div> <div data-bbox="338 557 1037 610"> On behalf of the member companies of the Montana Contractors' Association, I am writing to comment on the Draft EIS in support of the preferred alternative for reconstruction of the Going-to-the-Sun highway. We would like to offer several suggestions. </div> <div data-bbox="338 628 1041 734"> We understand that continued use of the highway during construction is a high priority for the Park Service and for adjoining communities, and we acknowledge the emphasis on convenience to tourists. However, we feel compelled to urge you to ensure that safety to construction workers is not sacrificed in the process. Construction is inherently dangerous in normal conditions. This project will present enormous challenges to selected contractors due to steep, unstable slopes, engineering constraints, nighttime work, unpredictable weather, and heavy traffic. </div> <div data-bbox="338 751 1043 805"> It goes without saying that motorists drive this highway to enjoy the scenery. A quick glance at a Bighorn Sheep in the middle of an active, congested construction zone could prove disastrous. Attention to safety of motorists and construction workers must be the top priority of this construction project. </div> <div data-bbox="338 821 1045 911"> We also encourage the Park Service to structure construction projects so Montana's highly skilled and qualified contractors have opportunities to bid on the work. The Park Service has placed high emphasis on the economic impact of tourism to local economies and we ask that you also structure construction contracts in a manner that is conducive to local/regional contractors competitively bidding the projects. We would be happy to work with you in devising criteria for construction contracts. </div> <div data-bbox="338 927 1043 980"> Finally, we would offer our assistance in conveying the importance of this project to the appropriate decision-makers to ensure adequate funding is made available. Please let us know what we can do to expedite the funding of this important project for Montana. </div> <div data-bbox="338 997 611 1016"> Thank you for the opportunity to comment. </div> <div data-bbox="338 1034 405 1052"> Sincerely, </div> <div data-bbox="321 1044 558 1133">  </div> <div data-bbox="338 1104 459 1138"> Cary Hegberg Executive Director </div> <div data-bbox="338 1156 579 1229"> Cc: MCA Board of Directors Sen. Max Baucus Sen. Conrad Burns Congressman Denny Rehberg </div> <div data-bbox="331 1256 506 1310"> Telephone (406) 442-4162 Fax phone (406) 448-3199 Website: www.mtagc.org </div> <div data-bbox="657 1250 735 1325">  </div> <div data-bbox="905 1091 1016 1117"> SEP 23 2002 </div> <div data-bbox="926 1122 978 1154">  </div> <div data-bbox="905 1256 1064 1310"> 1717 11th Avenue Post Office Box 4519 Helena, Montana 59604 </div> <div data-bbox="1060 1291 1102 1331"> 15 </div>	<p>1. The NPS and FHWA will encourage local contractors, including Native American communities to bid on the rehabilitation of the Road.</p>


Comment #	Letter #23	Response
1	<div data-bbox="323 293 443 370"> </div> <div data-bbox="451 298 1005 334"> <p>MONTANA HISTORICAL SOCIETY</p> </div> <div data-bbox="472 337 974 376"> <p>225 North Roberts ♦ P.O. Box 201201 ♦ Helena, MT 59620-1202 ♦ (406) 444-2694 ♦ FAX (406) 444-2696 ♦ www.montanahistory.org</p> </div> <div data-bbox="342 375 470 399"> <p>October 1, 2002</p> </div> <div data-bbox="342 417 581 503"> <p>MICHAEL O HOLM SUPERINTENDENT GLACIER NATIONAL PARK WEST GLACIER MT 59936</p> </div> <div data-bbox="823 337 1003 506"> </div> <div data-bbox="342 519 1005 547"> <p>RE: Going-to-the-Sun Road Rehabilitation Plan/Draft Environmental Impact Statement</p> </div> <div data-bbox="342 563 459 587"> <p>Dear Michael,</p> </div> <div data-bbox="342 604 984 670"> <p>Thank you, for the Draft EIS. We will place it in our files and await any construction plan so we can assess what affect all this planned work will have on this important resource.</p> </div> <div data-bbox="342 686 1008 755"> <p>You may choose and we would recommend that we develop a PA to establish a means for future phased reviews of specific project plans/impacts before signing ROD. The recommended parties would be the SHPO, ACHP, National Landmark folks, and GNP.</p> </div> <div data-bbox="342 771 997 815"> <p>If you have any questions about any points that I have made, you may call me at (406) 444-0388.</p> </div> <div data-bbox="342 834 428 860"> <p>Sincerely,</p> </div> <div data-bbox="344 841 621 927"> </div> <div data-bbox="342 917 581 963"> <p>Josef J Warhank Review & Compliance Officer</p> </div> <div data-bbox="342 979 386 1003"> <p>file:</p> </div> <div data-bbox="306 1261 359 1315"> </div> <div data-bbox="352 1268 1026 1318"> <p>STATE HISTORIC PRESERVATION OFFICE ♦ 1410 8th Ave ♦ P.O. Box 201202 ♦ Helena, MT 59620-1202 ♦ (406) 444-7715 ♦ FAX (406) 444-6575</p> </div> <div data-bbox="1018 1295 1071 1336"> <p>23</p> </div>	<p>1. Since receipt of this letter, the NPS, in consultation with the State Historic Preservation Office, has agreed that Section 106 compliance would be conducted separately for each phase of design and construction. The Park will work with the State Historic Preservation Office to develop a Programmatic Agreement for reoccurring rehabilitation actions. Individual Section 106 consultations will occur for rehabilitation plans that result in unique circumstances for a particular section of Road.</p>


Comment #	Letter #36	Response
	<div data-bbox="338 289 428 375" data-label="Image"> </div> <div data-bbox="472 295 974 365" data-label="Text"> <p>UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 8, MONTANA OFFICE FEDERAL BUILDING, 10 West 15th Street, Suite 3200 HELENA, MONTANA 59626</p> </div> <div data-bbox="352 401 434 422" data-label="Text"> <p>Ref: 8MO</p> </div> <div data-bbox="352 440 480 462" data-label="Text"> <p>October 24, 2002</p> </div> <div data-bbox="352 480 621 561" data-label="Text"> <p>Mr. Michael O. Holm, Superintendent Project Management Office Glacier National Park West Glacier, Montana 59936</p> </div> <div data-bbox="831 360 1005 537" data-label="Image"> </div> <div data-bbox="653 620 1012 659" data-label="Text"> <p>Re: Going-to-the-Sun Road Rehabilitation Draft EIS</p> </div> <div data-bbox="348 675 470 698" data-label="Text"> <p>Dear Mr. Holm:</p> </div> <div data-bbox="348 716 1010 876" data-label="Text"> <p>The Environmental Protection Agency (EPA) Region VIII Montana Office has reviewed the Draft Environmental Impact Statement (DEIS) for the Going-to-the-Sun Road Rehabilitation Project. 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 (see explanation of EPA DEIS rating criteria enclosed).</p> </div> <div data-bbox="346 893 1014 1094" data-label="Text"> <p>The EPA does not object to Glacier National Park's the preferred alternative, Shared Use with Extended Rehabilitation Season Alternative (Alternative 3), to rehabilitate the Going-to-the-Sun Road. We are pleased that proposed road rehabilitation alternatives would not change existing road width and alignments, since new road widening and new alignments generally have greater potential for adverse environmental impacts. We understand that proposed road rehabilitation would be carried out over a 7 to 8 year period, and that visitor use and access during road repairs would be maintained with minimal delays and disruptions. We also understand that Alternative 3 proposes improvements and upgrades to visitor use facilities adjacent to the road (e.g., improved parking at pullouts and visitor centers, vegetative clearing at scenic vistas, improved trails, interpretive information and toilet facilities).</p> </div> <div data-bbox="344 1110 1008 1214" data-label="Text"> <p>We do have concerns about potential water quality impacts during construction, since the Going-to-the-Sun Road parallels McDonald Creek, Lake McDonald, Reynolds Creek, and St. Mary Lake, and that portions of the Road lie within the floodplain of Sprague, Snyder, Avalanche, McDonald, Rose, and Divide Creeks and the St. Mary River. We recognize, however, that these impacts will be likely be short term. Encroachment of the road upon these</p> </div> <div data-bbox="869 1255 898 1286" data-label="Image"> </div> <div data-bbox="869 1271 1035 1289" data-label="Text"> <p>Printed on Recycled Paper</p> </div> <div data-bbox="982 1219 1056 1289" data-label="Text"> <p>36</p> </div>	


Comment #	Letter #36 continued	Response
	<p>waterbodies and their floodplains should be avoided. It is important that all possible efforts be made to utilize sediment and erosion control measures during construction to avoid and minimize sediment entry to streams and lakes. We particularly recommend maintenance of filter barriers, especially vegetated areas, between construction sites and surface waters to filter out sediment before construction runoff enters surface waters.</p> <p>Road rehabilitation planning and design should seek to avoid or minimize encroachment upon or modification of natural stream channels. Bridges and culverts should be designed to avoid sediment deposition above stream crossings or scour below stream crossings. All possible efforts should be made to avoid and minimize siltation in streams that require bridge or culvert replacement. We recommend that culverts simulate the natural stream grade and substrate as much as possible to avoid concerns with fish passage. Bridges or open bottom arch culverts that allow natural stream bed substrate and stream grade, and sufficient width and capacity to pass flood flows and bedload transport with minimal encroachment upon the river channel and riparian area are preferred. Bridges with wide spans also afford opportunities for wildlife passage, and reduced wildlife-vehicle collisions.</p> <p>We are pleased that sediment and erosion control BMPs would be implemented and disturbed areas revegetated, and a weed management program implemented, and that extensive reclamation and revegetation efforts would be used to stabilize eroding roadside slopes as well as disturbed areas. It is also important that appropriate storm water discharge permits and turbidity exemption authorizations be obtained from the Montana Dept. of Environmental Quality prior to implementation of any road construction work (contact John Herrin in Helena at 444-3927 and Jeff Ryan at 444-4626, respectively).</p> <p>We also want to indicate that Divide Creek is listed by the State of Montana as a water quality impaired stream, since it does not fully support beneficial uses (i.e., Divide Creek is identified on Montana's Clean Water Act 303(d) list of impaired waters). Causes of water quality impairment are listed as channel incisement, fish habitat degradation, and other habitat alterations. The Montana Dept. of Environmental Quality (MDEQ) will be preparing a Total Maximum Daily Load (TMDL) with an associated water quality restoration plan to address these problems in Divide Creek. It is important that encroachment of the road upon the Divide Creek channel and floodplain be minimized, and that adequate capacity be provided during bridge and roadway design to accommodate natural bedload deposition and stream channel migration. We recommend that aquatic biologists and staff with training and knowledge of fluvial geomorphology be consulted during design of the Divide Creek bridge and of any other bridges or road features that may encroach on stream channels.</p> <p>Proposed road rehabilitation activities should be conducted in a manner that avoids further degradation of Divide Creek, and that is consistent with long term restoration as identified in the water quality restoration plan that will be developed by the State in association with the TMDL. The TMDL will need to be reviewed and approved by EPA. We recommend that Glacier Park staff contact the MDEQ (i.e., Robert Ray, 444-5319 in Helena) to ensure MDEQ concurrence on consistency of the proposed Going-to-the-Sun Road rehabilitation with MDEQ's TMDL development for Divide Creek.</p> <div data-bbox="989 1219 1058 1279" style="text-align: right;">  </div>	

Comment #	Letter #36 continued	Response
	<p>Finally we want to indicate that Glacier National Park staff should contact the U.S. Army Corps of Engineers to assure that the proper 404 permits necessary for discharges of dredged or fill material in waters of the U.S. that may occur during road construction work are obtained prior to carrying out road rehabilitation work (Contact Mr. Allan Steisle of the Corps of Engineers Office in Helena at 406-441-1375).</p> <p>The EPA's more detailed questions, concerns, and/or comments regarding the analysis, documentation, or potential environmental impacts of the Going-to-the-Sun Road Rehabilitation 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 Going-to-the-Sun Road Rehabilitation DEIS has been rated as Category EC-2 (Environmental Concerns-Insufficient information). A copy of EPA's rating criteria is attached.</p> <p>The EPA's environmental concerns regard potential construction impacts upon water quality, and consistency of proposed Road improvements with restoration of Divide Creek, a 303(d) listed stream in need of TMDL development. We also have concerns about potential impacts to sensitive and fragile vegetation (e.g., State rare velvet-leaf blueberry plant), and disturbances to wildlife and wildlife habitat adjacent to the roadway and near visitor facility improvements.</p> <p>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 or my staff in Helena at (406) 457-9022 or in Missoula at (406) 329-3313.</p> <p>Sincerely,</p>  <p>John F. Wardell Director Montana Office</p> <p>Enclosure</p> <p>cc: Cynthia Cody/Julia Johnson, EPA, SEPR-N, Denver Robert Ray, MDEQ, Helena</p> <div data-bbox="993 1235 1073 1312" style="text-align: right;">  </div>	

Comment #	Letter #36 continued	Response
	<p style="text-align: center;">U.S. Environmental Protection Agency Rating System for Draft Environmental Impact Statements Definitions and Follow-Up Action*</p> <p style="text-align: center;"><u>Environmental Impact of the Action</u></p> <p>LO - - Lack of Objections: The Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to 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.</p> <p>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.</p> <p>EO - - 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.</p> <p>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).</p> <p style="text-align: center;"><u>Adequacy of the Impact Statement</u></p> <p>Category 1 - - Adequate: EPA believes the draft EIS adequately sets forth the environmental impact(s) 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.</p> <p>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.</p> <p>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 or Section 309 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.</p> <p><small>* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.</small></p> <p style="text-align: right;">36</p>	


Comment #	Letter #36 continued	Response
	<p>EPA Comments on the Going-to-the-Sun Road Rehabilitation Draft EIS</p> <p><u>Brief Project Overview:</u></p> <p>Glacier National Park prepared this draft EIS to evaluate alternatives for rehabilitation of the Going-to-the-Sun Road, a 50 mile road traversing east-west across Glacier National Park from West Glacier to St. Mary, and crossing the continental divide. Going-to-the-Sun Road is a National Historic Landmark. The purpose of the project is to protect and preserve the National Historic Landmark and premier visitor experience in Glacier National Park, and prevent further loss or damage to natural and cultural resources and protect visitors and employees. Since the road's original construction in 1932 traffic volume, avalanches, harsh weather, and inadequate maintenance have caused deterioration of the structural and historic features of the road. The entire 50 mile Going-to-the-Sun Road is in need of rehabilitation, although the most critical needs are located on the 11 mile alpine section where the terrain is steep, the road is narrow, and there is little or no shoulder. Due to climatic conditions the construction season is limited to 4 to 6 months (late spring, summer, and early fall). Maintenance of visitor access and support for local and regional businesses and communities that rely on summer tourism is a significant socioeconomic issue.</p> <p>Road rehabilitation alternatives are directed at addressing the road deterioration, while minimizing impacts to cultural, natural and socioeconomic resources within the confines of the short construction season. Each of the road rehabilitation alternatives would maintain the existing road width and alignment and use the same construction techniques. A Citizens Advisory Committee was established to provide public input into road rehabilitation alternatives. This Committee was made up of a diverse group of local business leaders from the east and west sides of the Park; state and local government officials; Blackfeet and Confederated Salish and Kootenai Tribal officials; Montana and Canadian tourism representatives; and local and national experts on environmental, economics, historic preservation, and highway engineering. The Committee met from February 2000 to December 2001 to advise the National Park Service how to best accomplish road rehabilitation.</p> <p>Alternative 1 is the Repair As Needed or No Action Alternative which represents the existing situation. Under this alternative roadwork would be limited to critical and emergency repairs as funding allows. Road rehabilitation is estimated to take 50 years at current levels of funding and would cost from \$328 to \$394 million. This alternative would not meet Park goals to correct safety issues, protect resources, and maintain world class visitor experiences.</p> <p>Alternative 2 is the Priority Rehabilitation Alternative that allows for planning and design to complete road rehabilitation more proactively than responding to roadway failure and emergencies. Under this alternative roadwork would be limited to critical and emergency repairs as funding allows. Road rehabilitation is estimated to take 20 years, but this would still allow deterioration of historic, natural and scenic resources. The estimated is \$157 to \$186 million. This alternative would only make a few improvements to visitor use facilities and visitor development.</p> 	


Comment #	Letter #36 continued	Response
	<p>Alternative 3 is the Shared Use with Extended Rehabilitation Season Alternative, which was recommended by the Citizen's Advisory Committee and is the preferred alternative. This alternative would require 7 to 8 years to complete road rehabilitation in order to maintain visitor use and access during road repairs. Improvements and upgrades to visitor use facilities adjacent to the road such as improved parking at pullouts, and visitor centers, vegetative clearing at scenic vistas, improved trails, interpretive information and toilet facilities are also part of this alternative. Costs of this alternative range from \$140 to \$170 million. Roadwork would be conducted from late spring to early fall with the most extensive work conducted prior to July 4th and after September 15th. Between July 4th and September 15th a maximum cumulative traffic delay of 30 minutes over the length of the road during peak visitor hours would occur. This is similar to delays experienced during the past 3 years for roadwork. Longer delays would occur during early morning, evening and at night. Before July 4th and after September 15th when visitation is typically lower, traffic would be suspended within discrete work zones, while Logan Pass and the remainder of the road would remain open.</p> <p>Alternative 4 is the Accelerated Completion Alternative to complete rehabilitation as quickly as possible by using isolated traffic suspensions Monday through Thursday and maintain visitor access on the weekends from Friday to Sunday (May through October). This alternative would implement road repairs over 6 to 8 years at a cost of \$126 to \$144 million, and include the visitor use facility improvements and upgrades proposed with Alternative 3.</p> <p><u>Comments:</u></p> <ol style="list-style-type: none"> 1) Thank you for providing a description of the deficiencies and needs of the existing roadway involving road drainage, slope stability and rockfall hazard, retaining walls, arches, guardwalls and tunnels, pavement, operation and maintenance, safety, cultural resources, and visitor use facilities (pages 8 to 23, and Appendix A). This information improves public understanding of Going-to-the-Sun Road deficiencies, project purpose and need, and provides important background information for understanding road rehabilitation alternatives. 2) The EPA does not object to the Shared Use with Extended Rehabilitation Season Alternative (Alternative 3), the preferred alternative, to the rehabilitate the Going-to-the-Sun Road over a 7 to 8 year period maintaining visitor use and access during repairs, with minimal delays and disruptions. We also understand that this alternative includes improvements and upgrades to visitor use facilities adjacent to the road (e.g., improved parking at pullouts, vegetative clearing at scenic vistas, improved trails, interpretive information and toilet facilities). We are particularly pleased that the road rehabilitation alternatives would maintain the existing road width and alignment, since new road alignments and road widening and expansion generally have greater potential for adverse environmental impacts. <p style="text-align: center;">3</p> <div style="text-align: right;">  </div>	


Comment #	Letter #36 continued	Response
<p>1</p>	<p>3) It is not clear why the more extensive level of improvements and upgrades to visitor use facilities adjacent to the road (e.g., improved parking at pullouts, vegetative clearing at scenic vistas, improved trails, interpretive information and toilet facilities) that are proposed and included in Alternatives 3 and 4, were not also included in Alternative 2 (which includes more limited visitor use facilities improvements). Why were comparable levels of visitor use facility improvements and upgrades not included and evaluated as part of Alternative 2?</p> <p>4) Thank you for including descriptions of mitigation measures proposed to reduce environmental effects (pages 64 to 70). This information is important to for public understanding of the many efforts and measures proposed to avoid and minimize adverse impacts.</p> <p>2</p> <p>5) It is stated that streams and lakes most likely to be affected by proposed road rehabilitation include McDonald Creek, Lake McDonald, Reynolds Creek, and St. Mary Lake because these drainages parallel the road (page 184). It is also stated that portions of the Going-to-the-Sun Road likely lie within the floodplain of Sprague, Snyder, Avalanche, McDonald, Rose, and Divide Creeks and the St. Mary River, and may impact Lake McDonald and St. Mary Lake (pages 115, 184). The EPA has concerns about potential impacts to water quality during construction, particularly road construction activities needed to address drainage features and stream crossings (culvert replacements, bridge construction, road drainage features, etc.).</p> <p>Road rehabilitation planning and design should seek to avoid or minimize encroachment upon or modification of natural stream channels. Bridges and culverts should be designed to avoid sediment deposition above stream crossings or scour below stream crossings. All possible efforts should be made to avoid and minimize siltation in streams that require bridge or culvert replacement. We recommend that culverts simulate the natural stream grade and substrate as much as possible to avoid concerns with fish passage. Bridges or open bottom arch culverts that allow natural stream bed substrate and stream grade, and sufficient width and capacity to pass flood flows and bedload transport with minimal encroachment upon the river channel and riparian area are preferred. Bridges with wide spans also afford opportunities for wildlife passage, and reduced wildlife-vehicle collisions.</p> <p>It is important that all possible efforts are made to utilize sediment and erosion control measures during construction to avoid and minimize sediment entry to streams and lakes. We particularly recommend maintenance of filter barriers, especially vegetated areas, between construction sites and surface waters to filter out sediment before construction runoff enters surface waters. We are pleased that sediment and erosion control BMPs would be implemented and disturbed areas revegetated, and a weed management program implemented (pages 66, 182, 184, 187). We are also pleased that extensive reclamation and revegetation efforts would be used to stabilize eroding roadside slopes as well as</p> <p>4</p> 	<p>1. Alternative 2 did not include the same level of visitor use improvements and upgrades as Alternatives 3 and 4 because the focus is to use all available funding to complete Road rehabilitation. Alternatives 3 and 4 include additional costs for transit and visitor use improvements, because these help mitigate the effects of completing the rehabilitation in less time.</p> <p>2. The NPS is also concerned with minimizing impacts to water quality during rehabilitation. The NPS would avoid and minimize direct impacts to streams and water features to the maximum extent practicable using Best Management Practices and other erosion control measures. No substantial modifications or encroachment of natural stream channels are anticipated. Final engineering designs would seek to minimize disturbances near water features to the minimal area needed to accomplish repair objectives. An overall long-term beneficial effect to water quality is anticipated with drainage improvements.</p>


Comment #	Letter #36 continued	Response
3	<p>disturbed areas (i.e., topsoil salvage, seed collection, use of soil amendments, monitoring of revegetation success). It is important that appropriate storm water discharge permits and turbidity exemption authorizations (Section 318) be obtained from the Montana Dept. of Environmental Quality (MDEQ) prior to implementation of any road construction work (contact John Herrin in Helena at 444-3927 and Jeff Ryan at 444-4626, respectively).</p>	<p>3. A stormwater management plan will be prepared and a discharge permit and turbidity exemption authorization will be acquired from the Montana Department of Environmental Quality prior to construction. The stormwater management plan will include specifications for implementation of erosion and sediment control measures during construction.</p>
4	<p>Discharges of fill material into streams, wetlands and other waters of the United States are regulated by Section 404 of the Clean Water Act, 33 U.S.C. 1344, which is administered jointly by the U.S. Army Corps of Engineers and EPA. For purposes of Section 404 permits, where dredge or fill activity is proposed in waters of the United States, all aquatic resource areas, including streams and wetlands, should be clearly identified and assessed in relation to project impacts. We recommend that the National Park Service contact the U.S. Army Corps of Engineers to assure that the proper 404 permits necessary for road construction work in or near waters of the U.S. are obtained prior to carrying out road rehabilitation work (Contact Mr. Allan Steinle of the Corps of Engineers Office in Helena at 406-441-1375).</p> <p>Road rehabilitation planning and design should also seek to avoid or minimize wetlands impacts, and any unavoidable impacts to wetlands should be compensated for through wetland restoration, creation, or enhancement. Compensation should be directed at restoring or replacing lost wetland functions. Wetland mitigation requires a thorough evaluation of all less environmentally damaging project alternatives, to assure that all practicable efforts have been made to avoid or minimize wetland impacts. Alternatives to road siting in streams and wetlands are presumed to be available unless demonstrated otherwise. We also note that it is stated that the majority of construction staging areas would be located outside of the Park because of limitations in available space within the Park (page 62). It will be important to avoid siting construction staging areas in or near waters of the U.S., including wetlands, or other environmentally sensitive areas.</p> <p>We are pleased that it is stated that all wetlands near work zones would be identified and marked to prevent inadvertent disturbance during construction (page 189). The 404(b)(1) Guidelines (found at 40 CFR Part 230) and Corps of Engineers, EPA, and U.S. Fish & Wildlife Service Wetland Specialists should be consulted for specific guidance on the scope of avoidance and minimization alternatives that need to be addressed under 404(b)(1).</p> <p>6) We note that the flooding problems at the Divide Creek bridge are identified (pages 10, 30), and it is stated that the current plan is to "stay with the existing alignment elevating portions of the Road and/or constructing low water crossings" (page 58). It will be important to avoid or minimize encroachment of the road upon the Divide Creek channel and floodplain. Adequate capacity should be provided during bridge and roadway design to accommodate natural bedload deposition and stream channel migration. We</p>	<p>4. Impacts to wetlands during rehabilitation will be avoided to the maximum extent possible. No permanent loss of wetlands has been identified for any of the alternatives. If temporary impacts occur from culvert replacement or other roadside activities, disturbed areas will be promptly reclaimed and vegetated. Unavoidable impacts to wetlands will be determined during final design for each construction segment. If impacts are identified, the U.S. Army Corps of Engineers will be contacted to obtain the necessary 404 permit prior to construction. In addition, should unavoidable wetland impacts occur, the NPS will fully comply with Executive Order 11990 and NPS Director's Order 77-1, including preparation of a Statement of Wetland Findings and public review of wetland impacts and mitigation measures.</p> <p>The potential for direct impacts to wetlands would be similar for all of the alternatives, as would avoidance and minimization measures.</p>

Comment #	Letter #36 continued	Response
5	<p>recommend that aquatic biologists and staff with training and knowledge of fluvial geomorphology be consulted during design of the Divide Creek bridge and of any other bridges or road features that may encroach on stream channels. Any conflicts anticipated in addressing the hydrologic deficiencies of the Divide Creek bridge while also addressing desires to preserve the historic character of the bridge at this location should be fully described.</p> <p>Glacier National Park should also understand that Divide Creek is listed by the State of Montana as water quality impaired, since it does not fully support beneficial uses (i.e., Divide Creek is identified on Montana's Clean Water Act Section 303(d) list of impaired waters). Causes of water quality impairment are identified as channel incisement, fish habitat degradation, and other habitat alterations. The Montana Dept. of Environmental Quality (MDEQ) will be preparing a Total Maximum Daily Load (TMDL) with an associated water quality restoration plan to address these problems in Divide Creek (carried out as part of the Cut Bank-Two Medicine TMDL Planning Area).</p> <p>The TMDL process identifies the maximum load of a pollutant (e.g., sediment, nutrient) a waterbody is able to assimilate and fully support its designated uses; allocates portions of the maximum load to all sources; identifies the necessary controls that may be implemented voluntarily or through regulatory means; and describes a monitoring plan and associated corrective feedback loop to insure that uses are fully supported.</p> <p>Proposed road rehabilitation activities should be conducted in a manner that avoids further degradation of Divide Creek, and is consistent with long term restoration as identified in the water quality restoration plan being developed by the State in association with the TMDL. We recommend that Glacier Park staff contact the MDEQ (i.e., Robert Ray, 406-444-5319 in Helena) to ensure MDEQ concurrence on consistency of the proposed Going-to-the-Sun Road rehabilitation with MDEQ's TMDL development.</p>	<p>5. The NPS will coordinate proposed roadwork in the Divide Creek floodplain with the Montana Department of Environmental Quality and the EPA during final design to ensure that proposed improvements are consistent with the TMDL analysis and restoration plan currently under development for the Cut Bank-Two Medicine TMDL Planning area. Proposed Road improvements are not expected to impair water quality in Divide Creek or contribute to additional channel incisement, degradation of fish habitat, or result in long-term increases in sediment. Additional discussion of these issues was added to the <i>Water Resource</i> section of Chapters 3 and 4 in the FEIS.</p>
6	<p>7) A portion of the proposed Road rehabilitation is in areas adjacent to highly valued and fragile plant communities, alpine (tundra) and subalpine (mountain) meadow ecosystems. These sensitive plant communities are easily damaged and slow to recover, and may be disturbed during construction work. We note that potential long-term adverse effects to State rare velvet-leaf blueberry plant near the Apgar transit staging area is identified (page 79). Special precautions should be taken to avoid impacts to sensitive and fragile plant communities, especially during construction of new pullouts, parking areas, and trails and other visitor facility improvements.</p>	<p>6. The NPS intends to implement measures to minimize impacts to alpine and other sensitive plant communities adjacent to the Road during rehabilitation. New disturbances would be limited to the smallest area possible to complete work. Sensitive species identified near the Road would be avoided as much as possible, with barriers used to protect sensitive plant communities from inadvertent damage. The Discovery Center and transit staging area at Apgar would be located to avoid and minimize impacts to velvet-leaf blueberry habitat.</p>
7	<p>8) We are concerned that there would be some loss of wildlife habitat from construction of visitor facility improvements (e.g., new pullouts, parking areas, and trails), particularly at the Baring Creek trailhead and Logan Pit development (page 194). Noise, disturbance and artificial light used during nighttime construction would also adversely affect some wildlife species (page 191). We are pleased that measures are proposed to mitigate</p>	<p>7. A minor loss of wildlife habitat would occur adjacent to the Road and near areas of existing visitor use developments. The majority of the improvements to existing pullouts, parking areas, and trails would be located within or adjacent to previously disturbed areas. The parking area at the Baring Creek Trailhead and the oversized vehicle turnaround at Logan Pit have been eliminated from the preferred alternative because of the potential impact to wildlife and habitat.</p>

Comment #	Letter #36 continued	Response
<p>8</p> <p>9</p>	<p>impacts to wildlife such as seasonal construction restrictions at sensitive locations, provisions for wildlife crossings at culverts and bridges, minimizing area of disturbance.</p> <p>9) We are pleased that environmental justice concerns would be mitigated by making efforts to ensure that Blackfeet Tribal members would participate in road construction (page 172). We recommend that the efforts to ensure Blackfeet Tribal member employment in road construction and economic benefits from the project be described in greater detail.</p> <p>10) 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 (page 130). 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 road rehabilitation work (e.g., concrete batch plants) are properly permitted (contact Dave Klemp 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 occur on the Blackfeet Indian Reservations should be coordinated with Betsy Wahl of the EPA Montana Office (406-457-5013). We are pleased that dust abatement measures would be implemented to minimize particulates, and that a transit bus system would be expanded in the preferred alternative to reduce private vehicle travel and associated emissions (pages 205, 206). We are also pleased that there would be no asphalt batch plants located in the Park (page 62).</p> <p>11) We are also pleased that there would be no impact to the values for which the Middle Fork Flathead River was designated Wild and Scenic (page 211).</p> <p>7</p> 	<p>8. The NPS encourages participation by Native Americans in construction-related employment and business opportunities associated with rehabilitation of the Going-to-the-Sun Road. Contractors could be required to implement hiring goals among minority and low-income populations. Preferences for minority businesses would be administered under provisions of the Federal Acquisition Requirements.</p> <p>9. Prior to construction, GNP will acquire the air quality permits that may be necessary. It is not known at this time whether a concrete batch plant would be located in the Park or adjacent lands. The Montana Department of Environmental Quality and/or the EPA will be contacted regarding proper authorization for air pollutant emissions.</p>

Comment #	Comment #239	Response
<p>1</p> <p>2</p> <p>3</p>	<p>NOV 15 2002 04:18 PM SUN TOURS 406 226 9220 P.01</p>  <p>Sun Tours Cultural Tours in Glacier National Park</p> <p>To: Superintendent of Glacier National Park</p> <p>From: Ed Des Rosier, CEO, Sun Tours</p> <p>Subject: Comments on Going-to-the-Sun Road Rehabilitation Plan/Draft EIS</p> <p>I think the shared alternative #3 makes the most sense. Here's some points I would like considered. They are not in any order of priority.</p> <ul style="list-style-type: none"> • Eliminating all non-concession dual wheeled vehicles, most all of these are over the maximum width allowed and have never been enforced on Going-to-the-Sun road. Many are 4-door crew cab design that is over length as well. (Aggressive enforcement of length and width restrictions). • Some minimum widening, say 2 to 4 feet, of the narrowest sections from the loop to the top on the west side (these could easily be identified and many of them are quite short with out croppings that pose a hazard) and one section below the loop (less then 75 feet long). I would be happy to assist in identifying target areas. • Any preseason and after season closures after the snow has been cleared (prior to Independence Day and after mid September) should be open to concession tours only, to at least the top as the number of vehicles would be small in number and could move smoothly through construction sites with coordination with the contractor. <p>29 Glacier Avenue • East Glacier Park, MT 59434-0234 (800) 786-9220 • Fax (406) 226-9220 • Email: edesrosi@3rivers.net</p> <p>239</p>	<p>1. The NPS intends to maintain vehicle size restrictions between Avalanche and Sun Point and currently enforces size limitations at the entrance stations by notifying visitors of the restrictions. Warnings and citations are given when drivers are found violating these restrictions. The NPS periodically reviews and updates the types and models of vehicles that exceed designated size restrictions.</p> <p>2. There are no plans to widen the Road between the Loop and Logan Pass. While this is a narrow section of the Road, proposed rehabilitation of the Road would focus on repairs within the existing historic roadway. Road widening would adversely impact the character and visual quality of the Road, its designation as a National Historic Landmark, and natural resources values. Selective rock scaling could occur at some locations, but this would not materially change the width of the Road.</p> <p>3. Traffic suspensions within construction zones during the shoulder season are needed because rehabilitation work for this period would focus on activities that require construction across both lanes of the roadway, such as roadbase excavation, cross drain installation, major retaining wall repairs, and work on the narrowest sections of the Road. Furthermore, the contractor can save time on setup and takedown at construction sites by suspending traffic.</p>

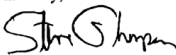
Comment #	Letter #239 continued	Response
<p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p>	<p>NOV-19-2002 04:19 PM SUN TOURS 486 226 9228</p> <ul style="list-style-type: none"> • Preference given to minority business and first option to existing concession service for any added services during the construction season, (transit services etc.). This would have to be subsidized to be viable. • Aggressive promotional efforts by the National Park Service to encourage travelers to use the existing tours by the concessionaires to reduce congestion. • Pull out improvement on the "big drift" area wide spot, with installation of guardrail. • Provide exclusive parking space for two buses for each concessionaire at the Trail of the Cedars area. • Improve communication between com. center, road maintenance, administration, and concessions services pertaining to any road issue that could affect the concession operation. • Place incentives in bids to contractors for expedited work, and less traffic flow restrictions. Monitor delays daily. • One of my most important concerns is a low cost, high profile transit system that will take clients away from our tours (a much more valuable service providing a more meaningful experience in Glacier National Park). I would suggest transit only to that clientele that wouldn't want to drive and want to get from point A to point B. <p>Please consider my comments and concerns into the record of the Going-to-the-Sun Road Rehabilitation/Draft Environmental Impact Statement.</p> <p>Thank you, Ed Des Rosier Sun Tours</p> <p>NOV 19 2002</p> 	<p>4. Procurement of new services is subject to Federal Acquisition Regulations (FAR). Any preference given for minority businesses would be subject to the provisions of these regulations. If non-subsidized transit or other commercial services are needed, contracts with existing concessioners would be reviewed to determine if services fall under the contract provisions. The NPS will be examining funding options for shuttle service and possible subsidies that may be needed to provide reasonably priced service.</p> <p>5. The NPS intends to encourage visitors to use available tours provided by concessioners, as well as the shuttle system to travel through the Park and reduce private vehicle traffic during rehabilitation.</p> <p>6. Improvements to the Big Drift pullout east of Logan Pass have been added to the visitor use measures included in Alternatives 3 and 4. During final design, the NPS would determine whether a guardrail is appropriate.</p> <p>7. There are no planned changes in the parking design or capacity at the Trail of Cedars area (Avalanche) as part of the Road rehabilitation. Dedicated parking space for tour operators is beyond the scope of the proposed project and would be determined at a later date. Should redesign or parking improvements at Avalanche occur in the future, dedicated parking space for tour vehicles would be considered.</p> <p>8. The proposed Intelligent Transportation System (ITS) would provide substantially improved communications for all Road users. This system would allow the NPS to provide real-time information on the status of the Road, delays, weather and roadway conditions, transit and tour schedules, and other information that would assist concession tour operators and the public.</p> <p>9. The selection of contractors will be competitively bid to ensure that experienced quality contractors at reasonable costs are used. It is anticipated that a traffic control contractor would be used. This would provide better coordination of work efforts and NPS oversight of traffic management. The use of incentive-based contracts to expedite work would be considered when developing construction contracts.</p> <p>10. The proposed transit service during rehabilitation would provide a modest, but beneficial increase in the transit service available in the Park. The shuttle system would provide point-to-point service for visitors to access attractions along the Road. The tour service offered by concessioners provides a unique experience to visitors. Tour operators provide guided personal service with interpretative and cultural information and additional stops that would not be available on shuttles. The proposed transit service is not expected to draw visitors seeking a tour from existing tour operators. A continuation or change in the level of transit service following Road rehabilitation would be evaluated in the future.</p>


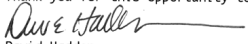


Comment #	Letter #240	Response
1	<p>ent By: NPCA; 406 863 2803; Nov-15-02 5:39PM; Page 1</p> <p> NATIONAL PARKS CONSERVATION ASSOCIATION* Protecting Parks for Future Generations®</p> <p>November 15, 2002</p> <p>Superintendent Mick Holm Glacier National Park West Glacier, MT 59936</p> <p>RE: NPCA Comments on Going-to-the-Sun Road Rehabilitation Plan DEIS</p> <p>Dear Mick,</p> <p>The National Parks Conservation Association appreciates this opportunity to provide comments on the Draft EIS for the Sun Road rehabilitation project.</p> <p>NPCA strongly supports Glacier's commitment to rehabilitating this National Historic Landmark, an engineering marvel and the primary means for most Glacier visitors to visit the park. We are committed to working with the park, gateway communities and other interested parties to secure full congressional funding for this project. Cognizant that historic funding levels for road maintenance have been less than 1/3 of levels necessary to adequately maintain the road, we also are committed to advocating full funding for long-term road maintenance and other core park functions, particularly protection of natural and cultural resources.</p> <p>We have several specific comments on the draft EIS:</p> <p>Transportation and Visitor Use plan – We agree with the comment made by Denver-based NPS transportation planner Kevin Percival, as quoted in the July 15, 2001 <i>Missoulian</i>. He told the paper that park officials will pay dearly in the long run if they insist on engineering a road before they know what the road's future use looks like. "The first step is to plan for the function of the road," he said. "Once you know how the road is going to be used, then you can work on engineering and cost estimates."</p> <p>NPCA is concerned that little discussion has been encouraged about the future function of the road and that the DEIS defers this issue for future discussions. We don't know to what extent future transportation systems in the park might affect engineering design considerations, but we would ask that the final design and engineering specifications maintain the option for the transportation system that might be in place in 50 or 100 years. This would mean, for example, trying to envision appropriate locations for handicap-accessible shuttle bus stops.</p> <p>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</p> <div style="display: flex; justify-content: space-between;"> <div data-bbox="325 1177 577 1258"> <p>NORTHERN ROCKIES REGION Tony Jewett, Regional Director Patricia Borneman, Program Assistant P.O. Box 824 • Helena, MT 59624 (406) 495-1560 • Fax (406) 495-1559 tjewett@npca.org • pborneman@npca.org</p> </div> <div data-bbox="609 1177 829 1258"> <p>REGION Steven Thompson Glacier Field Representative P.O. Box 4485 • Whitefish, MT 59937 (406) 862-6722 • Fax (406) 863-2803 stthompson@npca.org</p> </div> <div data-bbox="861 1177 1050 1258"> <p>NATIONAL OFFICE 1300 19th Street, N.W. Washington, D.C. 20036 (202) 223-NPCA (6722) Fax (202) 659-0650 npca@npca.org • www.npca.org</p> </div> </div> <p style="text-align: center;">PRINTED ON RECYCLED PAPER</p> <p style="text-align: right;">(240)</p>	<p>1. A comprehensive visitor use plan is not a component of the proposed Road rehabilitation plan. The rehabilitation of the Going-to-the-Sun Road focuses on repairs and improvements of the deteriorating structural and cultural features. Roadwork improvements at pullouts, including designating ADA accessible transit stops at popular sites, will accommodate transit use during rehabilitation and meet future transit needs. A parkwide transit system would be addressed after Road rehabilitation as would a visitor use plan. See response to comment 240-3.</p>




Comment #	Letter #240 continued	Response
<p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p>	<p>Sent By: NPCA; 406 803 2863; Nov-15-02 5:40PM; Page 2/4</p> <p>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 Many 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.</p> <p>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 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. What are the implications of such future transportation schemes for engineering design today? We don't know, but this should be addressed in the Final EIS.</p> <p>Engineering design for Sun Road rehabilitation should maintain options for an aggressive shuttle transit system to be implemented following construction activities. The road design also should maintain future options for providing safe bicycle-riding opportunities along the road corridor.</p> <p>Westside Discovery Center/Staging Area – The Final EIS and Record of Decision should address and clarify this issue in far greater detail. The DEIS states (on p. 50) that, "Funding for the Discovery Center is included in the budget for the proposed Going-to-the-Sun Road Rehabilitation Plan." However, there is very little discussion about this in the DEIS. NPCA fully supports construction of a new Westside visitor center, but we believe this discussion needs to be conducted with full public involvement outside this EIS, including through the <i>charrette</i> that previously has been discussed, which should consider location, function, design and integration of the center with a future transportation system (as discussed above).</p> <p>We also continue to be confused about the proposed budget for the Discovery Center. As recently as last spring, the Glacier Profile budget figures estimated a \$20 million preletting for construction of the Westside Discovery Center. A revised June 2002 budget profile eliminates that figure and instead lists approximately \$10 million for construction of a new "visitor orientation and transportation center" for the park. The relationship between this center, which apparently is what is intended as a rehabilitation mitigation measure, and the future Westside Discovery Center is unclear.</p> <p>NPCA does not have a set preference right now about the location of the Discovery Center, but we do not believe the Clerical Management Plan adequately and fully considered all options. We note that many Glacier employees agree with our belief that the appropriate location remains</p> <p>NOV 19 2002</p> <p>240</p>	<p>2. Substantial new bicycling opportunities for the Park are not planned as part of this project. Construction of a bike lane would require road widening and result in significant impacts to cultural and natural resources. Most of the high-elevation portions of the Road cannot be widened easily because of the steep terrain and resource damage that would occur. The NPS will continue to allow bicycling on designated roads in the Park and proposed roadway improvements and paving would provide safer conditions for bicyclist; however, restrictions on bike travel during peak visitor use periods would continue similar to current conditions.</p> <p>3. The NPS will be evaluating funding mechanisms for subsidizing shuttle service during rehabilitation. A variety of funding options were considered in the <i>Transportation and Visitor Use Study</i> (WIS 2001c). Options considered included nominal user fees in conjunction with additional entry fees or free shuttle service with surcharges for private vehicle use. These fees would not cover the initial start-up costs associated with cost of purchasing a fleet of shuttle vehicles, but would help cover operational costs. This project includes funding for capital improvements, maintenance, and operation of the transit service as part of the Road rehabilitation.</p> <p>One-way travel on the Road was considered, but rejected during rehabilitation because of the inconvenience to visitors and logistical problems. Similar difficulties are likely in the future with implementing an alternating one-way traffic scheme following rehabilitation. See the <i>Alternatives and Mitigation Excluded From Further Consideration</i> section in Chapter 2 of the FEIS for additional discussion.</p> <p>Implementation of a transit system during rehabilitation would give the Park an opportunity to experiment with different buses, schedules, fares, and stops. Depending on their success, various features could be part of a more permanent transit system after rehabilitation is complete. It was recognized that it would be difficult at this time to develop a system for transit service that would not be implemented until rehabilitation is complete. The industry is constantly changing and there may be opportunities for different types of shuttle vehicles or other methods to provide transit service. The implementation of future transportation options in the Park would be evaluated after Road rehabilitation, but proposed engineering design for rehabilitation of the Road is not believed to preclude any reasonably foreseeable transit options. This issue is addressed in the section on <i>Transit Service During Rehabilitation</i> for Alternative 3 in Chapter 2 of the FEIS.</p>

Comment #	Letter #240 continued	Response
		<p>4. See response to comment 240-3 and 240-2.</p> <p>5. The General Management Plan (GMP) addressed the Westside Discovery Center location and function. The Going-to-the-Sun Road Rehabilitation Plan FEIS addresses development of a transit staging area within the area of the Discovery Center near Apgar. Depending on the timing of funding, construction of the transit portion of the Discovery Center could be developed prior to completion of the Discovery Center building. As stated in the GMP, a comprehensive design plan for the structural components of the Discovery Center, including visitor uses, needs, and services, would be prepared, but the location for this facility has already been selected and no new information has been discovered that causes the NPS to re-examine the decision made in the GMP. Assuming funding for these facilities is provided, design and construction planning would be conducted early in the rehabilitation process.</p> <p>6. The West Side Discovery Center is synonymous with a visitor orientation and transportation center. The Discovery Center would have multiple purposes including a visitor center, museum, and transit staging area. The estimated gross construction costs for the Discovery Center is approximately \$10 million. The Rehabilitation Plan includes \$6 million for public transportation staging, parking, intersection improvements, utilities, and vehicle and pedestrian circulation at the Discovery Center site. The NPS is seeking additional funding for the completing the Discovery Center separate from the Rehabilitation Plan.</p> <p>7. The initial size of the shuttle staging would be based on the level of transit service as described in the FEIS for Alternatives 3 and 4. Future expansion of shuttle service would be evaluated near completion of Road rehabilitation. It is likely that any expansion of transit service would be implemented in a phased approach and the Discovery Center area would be designed to accommodate future shuttle staging if necessary. If a regional transportation system is in place, perhaps a shuttle staging area would be located outside the Park. If this occurs the Discovery Center may become an additional shuttle stop. See also response to comment 240-5 on the location of the Discovery Center.</p>

Comment #	Letter #240 continued	Response
<p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p>	<p>ent By: NPCA; 406 863 2803; Nov-15-02 5:40PM; Page 3/4</p> <p>an open and unresolved question. A central issue that should be considered in relation to the Discovery Center is the appropriate size of a shuttle staging area for the next 50 years. If the shuttle system is well integrated with gateway communities, much of the parking needs could be met outside the park. If the shuttle system began and ended within the park, then parking needs inside the park would be much greater.</p> <p>If the immediate decision is to construct a Discovery Center and/or visitor orientation and transportation center in Apgar, then no action should be taken before completion of a comprehensive design plan and environmental analysis for the Apgar area, as required by the General Management Plan.</p> <p>Shuttle system during rehabilitation – The only scenario worse than a poorly conceived shuttle system during the rehabilitation period is a poorly conceived shuttle system that fails because it is not affordable, attractive and/or convenient. An unpopular shuttle system during rehabilitation will make it that much harder to expand visitor use options, increase shuttle use and reduce traffic and parking options in the future.</p> <p>We note that the socioeconomic mitigation measure, “upgrade public transportation to and through Glacier National Park,” was rated the top visitor development action by business focus groups conducted during the Sun Road Advisory Committee process, as discussed in Appendix F of the Socioeconomic Report. This priority outranked the second-highest ranked measure by more than a 2:1 ratio. We don’t believe this priority has been given due attention in the DEIS.</p> <p>We favor the most aggressive possible shuttle system during reconstruction, and we believe the modest proposal in the preferred alternative is inadequate. Shuttle riders should be able to hop on and off shuttles at will with the expectation that they might catch the next shuttle to continue their journey. Shuttle intervals of an hour or longer are too long.</p> <p>The park should establish incentives for people to park their private vehicles to use a shuttle system, which may mean some variation of the car fee mentioned above. The road orientation center should clearly and dramatically notify private vehicle drivers that they may not find open parking spaces at Logan Pass and other places along the road, such as Avalanche. On the other hand, shuttle users can access Logan Pass and other places at will. Shuttle drivers should provide entertaining and informative interpretive services, as well, which should also be explained clearly at orientation centers, on web sites and through other public outreach media. The park should explore options to allocate parking spaces at Logan Pass to private vehicles, perhaps through a permitting system integrated with the Intelligent Transportation System.</p> <p>The alternative to providing incentives for people to park their car is long lines of cars at construction stops, increased congestion, flared tempers, and compromised visitor experience. Any proposed shuttle system should be evaluated by three basic criteria: Is it affordable, attractive and convenient? The answer should be yes on all three counts.</p> <p>To develop an appropriate shuttle system during rehabilitation and to ensure smooth transition to an excellent transportation system post-construction, the park should move immediately to develop a shuttle implementation plan and the appointment of a shuttle coordinator. The plan</p> <p style="text-align: right;">(240)</p>	<p>8. The NPS will prepare a comprehensive design for the Discovery Center and conduct plant, wildlife, and any necessary surveys.</p> <p>9. The primary focus of the proposed project is the rehabilitation of the Road. To partially mitigate for the impact of construction activities and traffic delays, the NPS is proposing to implement expanded shuttle service within the Park between Apgar and the St. Mary Visitor Center as recommended by the Citizens Advisory Committee and local businesses. Development of transportation service to GNP from gateway communities and other locations outside the Park is beyond the scope of the EIS and the authority of the NPS. However, the NPS fully supports private development of a public transportation system with connections to the proposed Park shuttle system. Currently, GNP is coordinating with Eagle Transit in an effort to improve regional transportation services including possible stops at West Glacier and linkage with the existing hikers shuttle. This issue is addressed in the section on <i>Transit Service During Rehabilitation for Alternative 3</i> in Chapter 2 of the FEIS.</p> <p>10. The shuttle schedule for the preferred alternative (Alternative 3) has been modified to provide shuttle service at ½-hour intervals, which is the same as proposed for Alternative 4. The NPS believes this level of service will provide a convenient and reliable alternative transportation option for visitors.</p> <p>11. The NPS will inform visitors of the various transportation options available in the Park including private tours, shuttle vehicles, bicycling, hiking, horseback riding, and private vehicles. The advantages of alternative methods of transportation would be emphasized. The proposed Intelligent Transportation System would greatly enhance the information provided to visitors on the status of road conditions and the parking status at Logan Pass and other popular sites. This information will assist visitors in making decisions about the form of transportation that best fits their activity. Currently, there are no plans for a permitting system for parking at Logan Pass, but the NPS will continue to evaluate options to improve parking and manage visitor use.</p>

Comment #	Letter #240 continued	Response
<p>12</p> <p>13</p>	<p>ent By: NPCA; 406 863 2803; Nov-15-02 5:41PM; Page 4/4</p> <p>should include recommendations for shuttle schedules, parking, integration with gateway communities, vehicles, shuttle stops, stop amenities, marketing and financing. In addition, we fully support Ford Transportation Scholar Susan Law's plan to organize a transportation committee composed largely of gateway community leaders to develop solutions to the the top visitor use development need already identified by gateway community leaders: Upgrade public transportation to and through Glacier National Park.</p> <p>Visitor Orientation, Information and Interpretation – NPCA supports strong visitor orientation, information and interpretation improvements during and after reconstruction to enhance the world-class visitor experience along the Sun Road. We believe the improvements discussed in the DEIS provide an excellent framework for providing these information services. We support the proposal to hinge details of the interpretive offerings on completion of the Park-wide comprehensive interpretive plan in 2003.</p> <p>Rehabilitation Scheduling – During the Sun Road Advisory Committee process, NPCA supported the shared-use alternative with several clear caveats: The plan should include a strong, visionary public shuttle system, provide multi-modal transportation options, including bicycle options and provide top-notch interpretive and orientation services. NPCA also asked for full evaluation of the costs and benefits of Glacier's original preferred reconstruction alternative, which was a fast-track approach. Under this approach, the road would have been closed for up to two years on the west side and up to two years on the east side (GMP, p. 47). This approach was favored by many respondents who commented during the Advisory Committee process or by business leaders who were interviewed during the focus groups or business survey (see p. 7, Business Survey). The Advisory Committee itself asked that the EIS evaluate the costs and benefits of the fast-track approach (p. 14, Advisory Committee Final Advice).</p> <p>Unfortunately, the DEIS neither considers the fast-track approach nor lists it as an alternative considered but excluded from further consideration. It simply doesn't appear to be mentioned in the DEIS at all. At the least, the FEIS should discuss why the fast-track approach should be excluded from further consideration. Ideally, it should be developed as a possible action alternative. If numerous public comments indicate support for the fast-track approach -- either because it is less costly for taxpayers, completes construction prior to Glacier's 100th anniversary, reduces total visitor and business impacts, or whatever -- then NPCA strongly recommends that a full alternative be developed for consideration.</p> <p>Thank you for this opportunity to provide comments on the Sun Road DEIS.</p> <p>Sincerely,</p>  <p>Steve Thompson Glacier Program Manager</p> <p>NOV 19 2002</p> <p>240</p>	<p>12. Implementation of a shuttle system is dependent on funding. Once the Record of Decision is signed and funding is secured, the NPS will begin developing an operation and maintenance plan including the acquisition of shuttle vehicles, and the development of shuttle schedules, and coordination with other transportation systems. The NPS is open to participating in a regional transportation committee to facilitate the planning and integration of regional transportation with Park transportation. See response to comment 240-9.</p> <p>13. A "fast-track" alternative for repair of the Going-to-the-Sun Road over 4 to 6 years was initially considered in the General Management Plan. This alternative would have closed the Road on each side of Logan Pass until repairs were completed. Because of substantial public concern over this alternative, the preferred alternative in the GMP was to conduct additional engineering and economic studies in consultation with a Citizens Advisory Committee, while maintaining the goal of completing the needed repairs before the road fails and minimizing impacts to cultural and natural resources, visitors, and the local economy. The result of the <i>Engineering Study</i> (WIS 2001a) and the recommendation of the Citizens Advisory Committee (NPS 2001a) were to evaluate a range of alternatives that provided for rehabilitation of the Road without closing the Road for extended periods. The NPS agreed with the results of the study and the Advisory Committee's recommendations. The alternatives recommended by the Advisory Committee were evaluated in detail in the Going-to-the-Sun Road Rehabilitation Plan/Draft EIS. The Accelerated Completion alternative (Alternative 4) is similar to the suggested alternative of closing half the Road at a time. This alternative includes suspension of traffic on weekdays with unrestricted visitor traffic on weekends and would complete the work in 6 to 8 years. A discussion of why a fast-track alternative was eliminated from detailed analysis was added to the <i>Alternatives and Mitigation Excluded From Further Consideration</i> section of Chapter 2 in the FEIS.</p>

Comment #	Letter #245	Response
<p>1</p> <p>2</p> <p>3</p>	 <p>Superintendent Mick Holm Glacier National Park, West Glacier, MT 59936</p> <p>November 15, 2002</p> <p>Dear Mr. Holm:</p> <p>This letter is submitted as the Montana Wilderness Association's official comments on the EIS regarding the comprehensive rehabilitation of the Sun Road. Please include this letter in the official comment record.</p> <p>MWA supports the "shared use" alternative. However, we have concerns on several issues:</p> <p>There appears to be no discussion on future transportation and visitor use options for the road corridor. One cannot really design a road unless one plans for future use and types of use. The park already faces major problems with traffic and parking congestion, which will increase with visitation unless bold steps are taken to improve public transportation and bicycling opportunities. Planning should occur now for handicap-accessible transit stops along the narrow road. There has been no planning for the function of the road in the current DEIS for road reconstruction.</p> <p>We believe the Park should begin now to look seriously at the future mass transit opportunities for the Sun Road. Mass transit will be, for better or worse (and we believe the better) the future use pattern on the Sun Road. The preferred rehab plan calls for a modest transit system during construction work: 6 shuttle buses operating at 1 hour intervals. We favors a more ambitious transit system put forward by NPCA to reduce the inevitable traffic congestion and delays during construction activities. A minimum of 14 vehicles operating at intervals of no more than 30 minutes will be a good step toward providing a convenient and frequent shuttle option.</p> <p>Lastly, please consider the NPCA suggestion of hiring a transit coordinator to develop a plan to implement a shuttle system during reconstruction work and to begin consultations with park advocates and gateway communities about a long-term transportation plan in and around the park. The goal would be to develop a transit system that is affordable (or free), attractive and convenient. The plan should include incentives for people to use public transportation through the park and to develop greater opportunities for safe bicycle travel on the Sun Road corridor.</p> <p>Thank you for this opportunity to comment.</p>  <p>David Hadden Montana Wilderness Association</p> <p>Northwest Field Office 307 1st Ave. E., #20 Kalispell, Montana 59901 t: 406-755-6304 f: 406-755-6334 e: mwamw@wildmontana.org www.wildmontana.org</p> <p>100% post consumer ♻️ chlorine-free processing</p>   <p>faxed to 888-7806 on 11/15</p>	<p>1. See the response to comments 240-3.</p> <p>2. See the response to comment 240-10.</p> <p>3. See the response to comments 240-3, 240-9, and 240-13.</p>

Comment #	Letter #259	Response
<p>1</p> <p>2</p> <p>3</p>	 <p>United States Department of the Interior</p> <p>FISH AND WILDLIFE SERVICE ECOLOGICAL SERVICES MONTANA FIELD OFFICE 100 N. PARK, SUITE 328 HELENA, MONTANA 59601 PHONE (406) 449-5221, FAX (406) 449-5339</p> <p>November 14, 2002</p> <p>M25 NPS Glacier NP Going to the Sun Road</p> <p>Memorandum</p> <p>To: Mr. Michael Holm, Superintendent, Glacier National Park</p> <p>From: R. Mark Wilson, Field Office Supervisor</p> <p>Subject: United States Fish and Wildlife Service's Comments Regarding the Draft Environmental Assessment for Glacier National Park's Going to the Sun Road Rehabilitation Project</p> <p>The U.S. Fish and Wildlife Service has reviewed the National Park Service's Draft Environmental Assessment regarding the Going to the Sun Road (GTSR) Rehabilitation Project in Glacier National Park, Montana, dated September 11, 2002. Our comments are provided below.</p> <p><u>General Comments</u></p> <p>Westslope cutthroat trout are prevalent throughout the GTSR corridor. However, an analysis of the effects to this species from the proposed project seems to be lacking. We recommend an analysis of the effects to westslope cutthroat trout from the proposed project be included in the Final Environmental Assessment (FEA).</p> <p><u>Specific Comments</u></p> <p>Page 62, 2nd column, last paragraph: You state that "water for dust abatement...would be needed." The final Environmental Assessment (FEA) should include an estimate for amount of withdrawals and a plan for water withdrawals to include criteria for location selection and any minimization measures to prevent fish entrainment if applicable. The EA should also describe the months of the year wherein GNP anticipates that water withdrawals could have adverse effects on the aquatic resources.</p> <p>Page 65, 1st column, 6th bullet: The FEA should include rationale for refueling within 100 feet of streams as well as provide details of a spill containment plan.</p>  	<p>1. Additional discussion on the potential impact to westslope cutthroat trout was added to the FEIS.</p> <p>2. The specific source, amount, and timing for water withdrawals from lakes, streams, or the Park's water system would not be determined until final design, construction plans and schedules are developed. Likely sources of water include Lake McDonald, McDonald Creek, and Saint Mary Lake. Water use could occur throughout the construction season from May to November. The NPS would provide contractors with acceptable locations for obtaining water. Preliminary criteria used in the selection of acceptable water sources include water bodies with sufficient water to prevent substantial changes in streamflow or volume, avoidance of spawning habitat, and locations that can be readily accessed with minimal resource damage. Pumps would be required to have screens to prevent the inadvertent entrainment of fish. Impacts to aquatic life from water withdrawals are expected to be minor. Additional discussion on water withdrawals, impacts to aquatic life, and mitigation measures was added to the FEIS and Chapter 2 includes additional conservation measures to protect water quality and native fish.</p> <p>3. No equipment servicing or refueling would be allowed within 100 feet of water bodies. Contract specifications would include restrictions on the location of fueling sites, requirements for spill containment, and other measures to safeguard aquatic and terrestrial habitat from construction-related contaminants. An additional mitigation measure to this effect was added to the FEIS.</p>

Comment #	Letter #259 continued	Response
<p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p>	<p>Page 65, 2nd column: For construction activities conducted within perennial flowing streams, timing restrictions may be appropriate to avoid impacts when native fish are present or when spawning areas are located downstream from the activity.</p> <p>Page 67, 1st column, 2nd bullet: The Service recommends that GNP analyze the effects to bull trout from the Exotic Vegetation Management Plan and consult, pursuant to the Endangered Species Act, with the Service should the GNP determine that the Plan may affect bull trout.</p> <p>Page 68, 1st column: Can GNP define what "best management erosion and sediment control measures..." they will be implementing?</p> <p>Page 129, 1st column, 1st paragraph (partial): You state that "Within the Going to the Sun Road Corridor, bull trout are present within Lake McDonald and McDonald Creek." Bull trout are also known to be present in St. Mary's Lake and Divide Creek and it is unknown whether bull trout are not present in other tributaries to both Lake McDonald and St. Mary's Lake. Please reflect this information in your FEA. Additionally, the Service recommends that surveys be conducted on the tributaries to Lake McDonald, McDonald Creek and St. Mary's Lake to determine fish assemblages.</p> <p>Page 195, 2nd column, 2nd paragraph: You state that "Proposed improvement to pullouts and parking areas at several locations adjacent to the Road would result in ground disturbances that would increase the potential for sediment entering the nearby streams or lakes." Does the GNP anticipate that any increases in angling will occur as a result of creating additional pullouts and improving existing ones? Could you detail in the FEA your analysis of this potential affect to the aquatic resources?</p> <p>If you have any questions regarding these comments, please contact Paul Hanna at (406) 758-6871 or Tim Bodurtha at (406) 758-6882.</p> <p><i>R. Mark Wilson</i></p> <p>cc: Kalispell Sub-Field Office</p> <p>bcc: USFWS, ES, 780 Creston Hatchery Rd, Kalispell, MT 59901 Office of the Solicitor, P.O. Box 25007, DFC, Denver, CO 80225 (Attn: Hoffman) Regional Environmental Officer, Denver</p> <p>ES:FERC:MT:Bigfork Hydro wp/db/DEA Response to Big Fork.wpd</p> <p style="text-align: right;">259</p>	<p>4. Construction activities, such as bridge or culvert work, in perennial streams would be conducted during low flow periods in the late summer and fall. There are no known spawning areas for bull trout near bridges or other drainage structures along the Going-to-the-Sun Road, although spawning habitat upstream from some crossings may be present. Construction activities downstream from spawning sites are expected to have minor short-term effects to aquatic life. Aquatic habitat and spawning activity would be further evaluated prior to construction to determine the need for restrictions in timing or other measures to avoid impacts to native fish. An additional mitigation measure was added to the FEIS indicating the need to protect spawning areas.</p> <p>5. Following revisions to the park-wide Exotic Vegetation Management Plan, the NPS will consult with the FWS on potential impacts to bull trout. This consultation is a separate action from the proposed Going-to-the-Sun Road Rehabilitation Plan because it is a parkwide plan.</p> <p>6. Specific best management practices for erosion and sediment control measures would be developed as a component of the stormwater NPDES permitting process and incorporated into the construction specifications. Erosion and sediment control measures would be tailored to specific site conditions for each phase of work. The measures likely to be used include: straw bales, silt fence, temporary detention basins, berms, sideslope drains, inlet and outlet protection, rock check structures, and other suitable measures. Mulching and revegetation of disturbed areas would provide long-term erosion and sediment control. Chapter 2 includes conservation measures to protect water quality and aquatic habitat.</p> <p>7. Corrections were made to the FEIS on the distribution of bull trout on the east side of the Park. Fishery surveys would be conducted on streams as needed prior to construction to supplement existing information and the NPS will inform the FWS of the results in a Biological Assessment.</p> <p>8. No additional pullouts for visitor parking would be created for any of the alternatives. Improvements at existing pullouts will improve traffic flow and better delineate parking spaces, but there would be no substantial change in parking capacity. Pullout improvements are not expected to result in a measurable increase in angling or impact to aquatic resources. Additional discussion of this issue was included in the FEIS.</p>

Comment #	Letter #260	Response
<p>1</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p>	<div data-bbox="367 370 487 483" data-label="Image"> </div> <div data-bbox="596 370 1041 435" data-label="Text"> <p>U.S. DEPARTMENT OF TRANSPORTATION FEDERAL HIGHWAY ADMINISTRATION 410 EAST FIFTH STREET NEW COLLEGE, MA 08601-3000</p> </div> <p data-bbox="810 537 951 553">November 29, 2002</p> <p data-bbox="810 573 873 589">Refer to:</p> <p data-bbox="367 553 594 643">Mr. Mick Holm, Superintendent Glacier National Park GTSR/DEIS Project Management Office West Glacier, MT 59936</p> <p data-bbox="367 662 483 678">Dear Mr. Holm:</p> <p data-bbox="367 699 1041 829">The Federal Highway Administration/Western Federal Lands Highway Division (FHWA) appreciates the opportunity to provide comments on Glacier Park's <i>Going-to-the-Sun Road Rehabilitation/Drift Environmental Impact Statement</i> (GTSR/DEIS). As a cooperating agency this office has worked closely with Glacier Park to provide engineering support in the design and construction of GTSR rehabilitation projects with the limited funding available, and we have provided technical assistance to the park and the Citizens Advisory Committee (CAC) during the recent engineering studies and the development of alternatives for the GTSR rehabilitation.</p> <p data-bbox="367 846 961 862">Following is a brief summary of comments on the GTSR/DEIS for your consideration.</p> <p data-bbox="367 881 468 898">CHAPTER 1</p> <p data-bbox="367 906 1041 979">1. Cooperating Agency. Note on the cover page and in Chapter 1 that FHWA is a cooperating agency with the National Park Service (NPS). Then FHWA will be able to adopt the document by issuing our own Record of Decision (ROD) to cover our administrative actions on future GTSR rehabilitation projects.</p> <p data-bbox="367 987 1041 1060">2. Recent Studies. Near the end of this section, suggest putting more emphasis on the fact that the <i>Engineering Study</i>, the <i>Socioeconomic Study</i>, the <i>Transportation and Visitor Use Study</i>, and the <i>Cultural Landscape Inventory and Report</i> contained detailed and well-documented data and recommendations that were used as the basis for discussion in the Purpose and Need section.</p> <p data-bbox="367 1068 1041 1141">3. Purpose and Need. In the introduction, suggest more emphasis on the rehabilitation objective of addressing the needs described in detail in the following sections, which are to prevent further deterioration of the identified deficiencies in the road's condition and deficiencies in visitor use facilities adjacent to the road.</p> <p data-bbox="367 1149 1041 1206">4. Current and future traffic use. The GTSR/DEIS states that the road is inadequate for the current traffic use and vehicle weights. Suggest stating what the traffic volumes and current vehicle sizes/weights are.</p> <p data-bbox="367 1214 1041 1287">5. Needs. In this chapter, there are many statements saying that things are needed such as transit facilities, parking areas, trail heads, etc. However, there is not always a description of the problems or desired opportunities that support these needs. Suggest summarizing from previous studies what the existing problems and/or opportunities are that support the need for these</p> <p data-bbox="1066 1320 1108 1336">260</p>	<p data-bbox="1129 727 1896 784">1. The NPS appreciates FHWA assistance and guidance throughout this project. The FEIS reflects FHWA as a cooperating agency.</p> <p data-bbox="1129 816 1955 906">2. Additional information was added to the <i>Recent Studies</i> section in Chapter 1 of the FEIS on the importance of the previous studies in developing the purpose and need for the proposed project.</p> <p data-bbox="1129 938 1944 1027">3. Additional description was added to the <i>Purpose and Need</i> chapter to clarify the objective of addressing the deficiencies in the Road condition and visitor facilities.</p> <p data-bbox="1129 1060 1923 1117">4. The FEIS includes additional information on how increased traffic over time has contributed to the condition of the Road.</p> <p data-bbox="1129 1149 1944 1206">5. Additional description was added to the FEIS indicating the concerns and deficiencies associated with visitor use facilities and transit.</p>

Comment #	Letter #260 continued	Response
<p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p>	<p>facilities.</p> <p>3. Decision Process (pg. 32). Suggest adding the italicized text to the following sentence, "The NPS is the project proponent and lead agency under NEPA, and FHWA is a cooperating agency."</p> <p>CHAPTER 2</p> <p>1. Costs of Operations and Maintenance (pgs. 35 & 163). Under Alternative 1 (no action) the park's O&M budget would remain the same. It might help to state that without the repairs, there would be a more rapid deterioration of the road that would eventually result in higher O&M costs (and reduce even further the funding that may be available for rehabilitation projects) just to keep the road open.</p> <p>2. Page 40. Suggest rewording the second sentence to, "This alternative is the best balance of rehabilitation requirements and minimizing impacts to visitors and local businesses." Otherwise, it may not be true that this alternative maintains visitation to similar conditions. Also, suggest changing 'low visitor use' with '<i>reduced</i> visitor use' on this page and page 42 under 'Traffic Management'.</p> <p>3. Page 43. Delete the first sentence, "Historic scenic vistas..." since this is repeated twice.</p> <p>4. Traffic Management (pg. 42). We recommend moving the shoulder season September 15 beginning date to the day after Labor Day, or at least to September 8. Adopting one of these earlier beginning dates for the shoulder season would be a significant help in the construction of the GTSR/DEIS preferred alternative. The chart on page 36 should also be modified to reflect this earlier shoulder season beginning date.</p> <p>5. Guardwall Improvements (pg. 60). The bulleted list should also include:</p> <ul style="list-style-type: none"> • Install removable timber guardrail (with steel backing) in some avalanche prone locations. <p>6. Pg. 61, first paragraph. The West Tunnel segment of the GTSR would probably need some pavement widening, as already called for in the Lake McDonald, Baring Creek, and St. Mary segments. The West Tunnel segment of road is similar in character to those other three segments (not generally constricted by walls as is the Alpine section), and so it may be possible to add some pavement widening on curves without impacting the historical fabric. Therefore, we recommend adding the West Tunnel segment to the list of the Lake McDonald, Baring Creek, and St. Mary segments.</p> <p>7. Avoidance Versus Mitigation. On page 64, clarify that mitigation does not include measures to avoid. Mitigation comes into play when one cannot avoid an impact but hopes to lessen it.</p> <p>8. Needed Resource Surveys (pg. 67). Suggest noting that resource surveys (such as for wildlife) will be conducted prior to <i>design activities</i>, instead of before <i>ground disturbing or construction activities</i>.</p> <p>9. Vehicle Inspection (pg. 67). Since this will be the NEPA document from which all environmental commitments and mitigation measures will be extracted for FHWA's construction environmental checklist, suggest clarifying the construction vehicle inspection requirement. FHWA requires that all construction equipment be pressure washed clean of mud and weed seed prior to their initial entrance into the park. Subsequent re-entries do not require cleaning unless requested by the contracting officer.</p> <p>10. Material Sources and Staging Areas (pg. 62). Depending on where these material sources and staging areas may be located outside of the park, and how they will be used, NEPA and/or</p>	<p>6. The suggested language was added to the FEIS.</p> <p>7. A discussion of the likely increase in O&M costs if the No Action alternative is implemented was added to the FEIS.</p> <p>8. The suggested edits were made to the FEIS.</p> <p>9. The suggested edit was made to the FEIS.</p> <p>10. The NPS has decided not to modify the construction season for the preferred alternative. Visitation the first two weeks in September often remains high and restrictions in travel during this period would inconvenience visitors and impact commercial businesses that are typically open during this period.</p> <p>11. The suggested bullet was added to the FEIS.</p> <p>12. Pavement widening on curves within the West Tunnel Segment of the Road (MP 16.2 to MP 23.4) is not anticipated, because oversized vehicles are not permitted between Avalanche and Sun Point.</p> <p>13. The distinction between avoidance and mitigation has been clarified in the FEIS.</p> <p>14. The suggested change was made in the FEIS.</p> <p>15. The suggested change to this mitigation measure was made in the FEIS.</p> <p>16. The NPS will comply with any additional NEPA or permitting requirements that may be necessary to address possible material sources and staging areas outside of the Park. The NPS will work with contractors in the selection of offsite facilities that would not adversely affect the environment.</p>

Comment #	Letter #260 continued	Response
<p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>other environmental compliance may be needed prior to using these sites.</p> <p>CHAPTER 3 This is the BEST Affected Environment Chapter our environmental specialist has ever read!</p> <p>1. CULTURAL RESOURCES. Top of page 111, suggest that cultural inventory of unsurveyed areas start now before the FEIS is issued and to complete Section 106. If delayed until the beginning of work, this could delay the desired project schedule.</p> <p>2. NATURAL RESOURCES.</p> <p>a. Water Resources. On page 116 under 'Water Quality', suggest spelling out what the units for phosphorus concentrations are.</p> <p>b. Threatened and Endangered Species and Species of Concern. Under 'Threatened and Endangered Species', the list provided by U.S. Fish & Wildlife Service (FWS) as shown in Table 27 on page 127, needs to be updated every six months. It's already over a year old.</p> <p>CHAPTER 4</p> <p>Definition and Coordination of Impacts. In addition to the effects as described in the GTSR/DEIS, suggest impacts also be described as may be related to other laws, particularly in regards to Section 7 of the Endangered Species Act (ESA) and Section 106 of the National Historic Preservation Act (NHPA).</p> <p>1. Wetlands. Under the 'Conclusion' on page 190, since there will be some impact to wetlands (and unless otherwise defined, the impact will be adverse), isn't a Statement of Findings (SOF) also required with the GTSR/FEIS (from NPS Procedural Manual 77.1)?</p> <p>CHAPTER 5</p> <p>1. ENDANGERED SPECIES ACT...On page 216, the GTSR/DEIS states that GNP will request initiation of Section 7 consultation when the FEIS is issued. It might be much more effective to start this before the FEIS is issued because; (a) FWS may have some input that would be relevant to disclose in the FEIS, and (b) because of the adverse effects that are predicted for many species, formal consultation is likely. If keeping on schedule is imperative, it would be best to start this process as soon as possible.</p> <p>2. EXECUTIVE ORDER 11990...On page 216, it states that no wetlands would be affected by any of the alternatives, but this appears to be inconsistent with page 190. NPS Manual 77.1 appears to require a SOF if there will be an adverse effect to any wetlands, regardless whether there is an encroachment.</p> <p>3. WILD AND SCENIC RIVER ACT – Does GNP have the FS concurrence on GNP's Section 7(b) determination under this act? If not, suggest it be procured.</p> <p>4. NATIONAL HISTORIC PRESERVATION ACT OF 1966 - Suggest that overall consultation occur prior to issuing the GTSR/FEIS and that SHPO's input be documented in the final published GTSR/FEIS. While there may be some site specific consultation needed for each construction phase, this would help prevent any unwanted delays.</p>	<p>17. The NPS and SHPO have agreed to review rehabilitation plans for each phase of construction. Cultural surveys would be completed at least one year prior to construction along with associated Section 106 consultation. Most of the areas where impacts could potentially occur have previously been evaluated. Every effort will be made to ensure that cultural resource and other environmental clearances are in place to avoid construction delays.</p> <p>18. The suggested correction to the text was made.</p> <p>19. An updated list and consultation with the FWS was conducted in December 2002. The list of threatened and endangered species remains the same as those discussed in the DEIS.</p> <p>20. Additional discussion was added to the Environmental Consequences chapter on the compliance requirements under the Endangered Species Act and Section 106 of the National Historic Preservation Act.</p> <p>21. A Statement of Wetland Findings (SOF) was not prepared for the FEIS because no direct loss of wetlands has been identified. NPS Directors Order 77-1 allows for exceptions from a SOF for maintenance, repair, and renovation structures, such as the minor temporary disturbances to wetlands (up to 0.1 acre) that may occur during the repair or replacement of existing facilities (e.g., culverts). The NPS intends to avoid wetlands to the maximum extent practicable, but should unavoidable impacts occur on more than 0.1 acre of wetlands, the NPS will comply with Executive Order 11990, secure the necessary permitting from the U.S. Army Corps of Engineers, and complete a SOF to address impacts and mitigation. Additional wetland surveys will be conducted during each design phase to assist with avoidance measures and identify any permitting requirements. Consultation was conducted with NPS Water Resources on this issue.</p> <p>22. The NPS initiated informal consultation with the FWS on June 5, 2000. A Biological Assessment and Programmatic Agreement was submitted to the FWS in February 2003. The FWS and NPS last met on this project in December 2002. Formal consultation has been initiated given the likely to adversely effect determination on grizzly bears. See page 203 for more information.</p> <p>23. See the response to comment 260-21.</p> <p>24. The NPS has a Memorandum of Agreement with the U.S. Forest Service (September 2001), which provides for Forest Service (Flathead National Forest) concurrence with the Park Service determinations on NPS projects within designated Wild and Scenic River corridors. Consultation with the</p>

Comment #	Letter #260 continued	Response
		<p>Forest Service is not required so long as projects within the Park do not affect the values of the Wild and Scenic River designations. The preferred alternative would not affect the values for which the Flathead River was designated. These values are “outstandingly remarkable scenic, recreation, geologic, fish and wildlife, historic, and cultural, shall be preserved in a free-flowing condition.” The preferred alternative would not affect the free-flowing status of the river, nor any of the values above. Furthermore, only a small portion of the project (about 300 feet) is within the corridor for the Wild and Scenic River near West Glacier.</p> <p>25. See the response to comment 260-17.</p>

Comment #	Letter #260 continued	Response
	<p>An attachment to this letter contains a list of minor comments/questions for consideration. If you have any other questions regarding these comments please call me at (360) 619-7729.</p> <p>Sincerely yours,</p> <p>Richard W. Gatten, P.E. Design Operations Engineer</p> <p>Enclosures: List of minor comments</p> <p>cc: Jody Marshall, WFLHD</p>	

Comment #	Letter #260 continued	Response
<p>26</p> <p>27</p> <p>28</p> <p>29</p> <p>30</p> <p>31</p>	<p>Attachment to November 29, 2002 letter</p> <p>COMMENTS TO CONSIDER <i>Going-to-the-Sun Road, Rehabilitation Project</i> <i>Draft Environmental Impact Statement</i></p> <p>Following are some general comments on the <i>Going-to-the-Sun Road, Rehabilitation Project, Draft Environmental Impact Statement</i>, (Glacier National Park, August 2002) (GTSR/DEIS).</p> <p>CHAPTER 1</p> <p>1. BACKGROUND</p> <p>a. Historic Significance. On page 3, perhaps define the significance or criteria for designation as a National Historic Landmark (NHL).</p> <p>b. Recent Studies. On page 7, there is mention that the cultural resource investigations will be done in two phases. Why? Also, the DEIS states, "The first phase is documented in the <i>Cultural Landscape Inventory</i> (RTI 2001), which will be updated in 2002." Since 2002 is coming to a close, has it been updated, or should the date for update be changed?</p> <p>2. PURPOSE AND OBJECTIVES. The list of objectives on page 8 is good.</p> <p>3. NEED FOR THE PROJECT</p> <p>a. Needs Associated with... From pages 9 to 23, these sub-topics really don't state what the need is but state what problems exist under each category. Would it be better to modify the headings of these sections to, "Problems Associated with..."?</p> <p>b. Needs Associated with Safety. On pages 14 and 15, there is no mention of current and future travel demand, park management of use, and desired future condition for traffic. Consider adding these in this section. Can this be found from the transportation studies mentioned on page 4 under "Previous Studies"?</p> <p>c. Needs Associated with Deficiencies in Visitor Use Facilities.</p> <p>i. Traffic. The GTSR/DEIS states on page 15, "Over 80 percent of Park visitors travel the Road." It also states on page 15, "Peak summer traffic frequently causes crowding at pullouts and parking areas along the Road." If the park knows what number of Seasonal Average Daily Traffic (SADT) equates to 80% of Park visitors, and what SADT equates to this peak use, suggest the information be included.</p> <p>ii. Pullouts and Parking (Pgs. 16-20). The GTSR/DEIS launches into proposals for transit facilities, yet there is no prior description of problems associated with transit service. Consider adding a section titled "Problems Associated with Transportation Circulation and Transit." There are numerous problems and needs listed under the 22 pullout and parking area locations listed. Recommend adding the rationale for proposed improvements and locations related to a) the West Side Discovery Center (identified in the park's</p>	<p>26. The Going-to-the-Sun Road meets National Historic Landmark (NHL) Criterion 1 for its association with the American Park movement. The Road also meets NHL Criterion 4 as an exceptionally valuable example of American landscape engineering, which blends the practices of civil engineering and landscape architecture. Additional discussion of the criteria meet by the NHL designation was added to the <i>Background</i> section of Chapter 1.</p> <p>27. The cultural resource investigations included two phases: 1) preparation of a Cultural Landscape Inventory (RTI 2001), which included a detailed field assessment and mapping of the historic features of the Road; and 2) a Cultural Landscape Report (RTI 2002), which provided descriptive information on the history of the Road, value of the resource, and recommendations for rehabilitation. An update to the report and supplemental mapping was completed in 2003 and is included as Volume 2 of the Cultural Landscape Report (RTI 2003). The text in Chapter 1 of the FEIS has been modified to describe this series of reports.</p> <p>28. The headings were changed to identify the problems associated with each component of the Road.</p> <p>29. The number of visitors and future travel demand are expected to grow slightly over the next 3 years and then level off until about 2020. Proposed Road improvements are not intended to increase the capacity of the Road, but rather to maintain and rehabilitate the condition of the Road and improve safety and the quality of visitor travel through the Park. The addition of slow-moving vehicle turnouts and proposed improvements to pulloffs and would further increase safety to motorists and pedestrians. These improvements plus the addition of transit service is expected to result in minor improvements in traffic flow and meet NPS objectives for a safe reliable roadway.</p> <p>30. Average daily traffic on the Going-to-the-Sun Road during the primary visitor use season ranges from about 3,600 vehicles per day near Lake McDonald to about 2,200 vehicles per day at St. Mary. Of the approximate 1.7 million annual visitors to the Park, about 80 percent travel the Road. Additional information on Park traffic was added to Chapter 2 of the FEIS.</p> <p>31. A new section on <i>Problems Associated with Transportation Circulation and Transit</i> was added to Chapter 1 of the FEIS.</p>

Comment #	Letter #260 continued	Response
<p>32</p> <p>33</p> <p>34</p> <p>35</p> <p>36</p> <p>37</p>	<p>GMP?), b) transit center and transit stop locations, c) toilet facilities, d) visitor use improvements such as information services, education, and interpretive information, and e) vehicle circulation and pedestrian movement.</p> <p>iii. Scenic Vistas. While it may be a good idea to demonstrate the concerns of the narrative with before and after photos, Figure 3 on page 20 does not appear to be a good example to describe the problem proposed in the text. The 1987 photo seems to show less mature trees by the roadside, the vegetation appears to be quite younger.</p> <p>4. ISSUES CONSIDERED IN THIS EIS.</p> <p>a. Natural Resource Issues, Wilderness and Wild and Scenic Rivers. On page 27, the GTSR/DEIS states, "The Going-to-the-Sun Road begins on the west side of the Park at the Middle Fork of the Flathead River, which is designated a Wild and Scenic river." Just as a <i>heads-up</i>, depending on the vicinity of the road to the Middle Fork of the Flathead River, this proposed project may require a U.S. Forest Service (FS) finding that the proposed project is consistent with the management plan for the Middle Fork of the Flathead River, which is jointly managed by NPS/FS under the Wild & Scenic Rivers Act, commonly referred to by the FS as a section 7(d) determination.</p> <p>CHAPTER 2 – All text pages relating to Transit Service During Rehabilitation, including Table 2, assumes no growth in park visitation, traffic, and base transit ridership during any of the intervals noted under each alternative. The text does make an assumption about using transit to mitigate construction via a mode shift in Alternatives 2, 3, and 4. Page 42 mentions that the system could operate using 15-passenger vans or 25-passenger buses but this is not reflected in cost or number of vehicles. Is the capacity of the system being taken into account?</p> <p>1. ALTERNATIVE 1- NO ACTION (REPAIR AS NEEDED)</p> <p>a. Traffic Management. Consider updating Table 2 with a footnote that longer delays or traffic suspensions may be needed if extensive damage occurs (the damage itself might close the road).</p> <p>b. Transit Service During Rehabilitation. Suggest the existing transit service be described in Chapter 1 in greater detail than the one sentence description written in this sub-section. Also, what is a two-way loop system?</p> <p>2. ALTERNATIVE 2-PRIORITY REHABILITATION. In "Traffic Management" on page 39, safety concerns are mentioned. Are these concerns related to construction, to the traveling public, or both?</p>	<p>32. The young vegetation shown in the 1987 photo illustrates roadside vegetation establishment because of better light and moisture conditions following original road construction. The new younger and denser trees and vegetation adjacent to the Road now obscure some of the scenic views that were originally present.</p> <p>33. See response to comment 260-24.</p> <p>34. Forecast estimates for the number of visitors to GNP indicates slight growth until 2006 (< 2% on average) and relatively constant visitor numbers thereafter to 2020. The cost estimate for transit service is based on the use of 25-passenger buses, if 15-passenger vans were used, acquisition and operating costs would be lower. Transit service for Alternatives 3 and 4 provides an increased level of service and capacity compared with Alternatives 1 and 2. While the demand for transit service is difficult to predict, the NPS will encourage efficient and full use of available transit capacity for whichever alternative is selected.</p> <p>35. A footnote was added to Table 2 indicating possible delays or road closure if extensive road damage occurs prior to rehabilitation.</p> <p>36. Additional information on the existing transit and tour service was added to the section on <i>Problems Associated with Transportation Circulation and Transit</i> in Chapter 1 and in the discussion of the No Action alternative in Chapter 2.</p> <p>The existing "two-way loop" includes shuttle service with eastbound departures from West Glacier and westbound departures from Swift Current, Many Glacier, and St. Mary Visitor Center. Multiple stops are made at points of interest throughout the length of the Road.</p> <p>37. The safety concern for night work is for construction crews. The steep terrain, possibility of rockfall, and other hazards are a safety issue for night work. Traffic would be suspended in night work zones to eliminate safety concerns for the traveling public.</p>

Comment #	Letter #260 continued	Response
<p>38</p> <p>39</p> <p>40</p> <p>41</p> <p>42</p> <p>43</p> <p>44</p> <p>45</p> <p>46</p> <p>47</p> <p>48</p>	<p>3. ALTERNATIVE 3-SHARED USE WITH EXTENDED REHABILITATION SEASON (PREFERRED)</p> <p>a. Visitor Use Improvements.</p> <p>i. Parking and Pullouts.</p> <ul style="list-style-type: none"> ▪ In Figure 7, suggest identifying the mileposts with the referenced slow-moving pullouts to help orientate the reader. ▪ Vista Management Plan. Is this plan in existence, or does it need to be prepared? ▪ Avalanche. On page 44, suggest identifying what the ITS system will provide to visitors. ▪ Logan Pit. Suggest you add <i>east-bound</i> as follows: "Currently, west-bound oversized vehicles..." ▪ St. Mary Falls Trailhead. This states, "Improvements at this popular trailhead are needed to meet safety standards." However, there are not corresponding problems identified in the Chapter 1, the Purpose and Need Chapter that describe the deficiencies in safety standards. Should they be? <p>ii. Visitor Orientation, Information and Interpretation</p> <ul style="list-style-type: none"> ▪ Intelligent Transportation System. In this sub-section, intelligent transportation systems (ITSs) are defined. Suggest defining it earlier in the chapter, so the reader might understand its inclusion at some sites. <p>4. ACTIONS COMMON TO ALL ALTERNATIVES</p> <p>a. Table 5. For those not familiar with the road segments in Table 5, it would be very helpful to have a corresponding Figure to show where these are.</p> <p>b. Road Rehabilitation Techniques. Suggest defining what a 'long life cycle' is as used on page 58. Is it 20 years, 50 years, etc.?</p> <p>5. TABLE 7. Under 'Cultural Resources', on page 75, the narrative for Alternative 3 appears inconsistent with the text on page 69 under 'Cultural Resource Mitigation'. The text on page 69 (under 'Actions Common to All Alternatives') states that all alternatives, including Alternative 3 may result in an adverse effect to the historic road and resources.</p> <p>CHAPTER 3— This is the <i>BEST</i> Affected Environment Chapter our environmental specialist has ever read!</p> <p>1. Visitation projections are missing from pages 82-83 including Figure 9. The GTSR/DEIS mentions trends but only provides visitation figures to the year 2000. We understand the projections for ridership or traffic over the next 20 years are relatively minimal; if so, this maybe should be stated.</p> <p>CHAPTER 4</p> <p>1. TABLE 29.</p> <p>a. Section 106. From pages 129 to 142, in the park's coordination with SHPO it should be determined if SHPO agrees that 'minor adverse' impact equates to a <i>no</i></p> <p style="text-align: right;">3</p>	<p>38. Mileposts were added to Figure 7.</p> <p>39. Existing Roadside Maintenance Guidelines (NPS 1993) and Design Guidelines for Vista Clearing (NPS 1999) provide direction for vista management. GNP is currently preparing landscape/vista management guidelines for the Road in cooperation with the Forest Service.</p> <p>40. A brief description of the ITS was added to the introduction of <i>Visitor Use Improvements for Alternative 3</i> in Chapter 2.</p> <p>41. Use of Logan Pit for an oversized vehicle turn-around was eliminated from the proposed action to minimize wildlife impacts.</p> <p>42. Edits to the discussion in Chapters 1 and 2 of the St. Mary Falls Trailhead parking area were made to clarify the safety concerns associated with this narrow roadside parking area.</p> <p>43. See response to comment 260-40.</p> <p>44. These road segments are shown in Figure 2. A reference was added to the text indicating this.</p> <p>45. A long life cycle indicates the plan to use high quality materials and construction methods to ensure that road repairs last and that maintenance requirements are minimized. The actual life cycle will vary with the structure or material, but a life cycle of 20 years or more is expected for most components, except surface paving. Additional information was added to the section on <i>Road Rehabilitation Techniques</i> in Chapter 2.</p> <p>46. No adverse effect to cultural resources are anticipated for Alternatives 3 and 4 because repairs would be implemented over a relatively short period, prior to significant further deterioration. Section 106 consultation with the State Historic Preservation Office (SHPO) and Advisory Council on Historic Preservation (ACHP) would occur for each phase of rehabilitation to determine potential adverse effect to cultural resources. If, during the course of final design, an unavoidable adverse effect is identified, the NPS would work with SHPO and ACHP according to Section 106 procedures to determine mitigation requirements.</p> <p>47. Information on visitor projections is included primarily in Chapter 4. Additional information was added on projected visitor numbers in Chapter 3, but because of the relatively small projected change in visitor numbers, this data was not included in Figure 9.</p> <p>48. Prior to construction, the NPS will seek concurrence from the SHPO on the determination of effects for cultural resources. See response to comment 260-17.</p>

Comment #	Letter #260 continued	Response
<p>49</p> <p>50</p> <p>51</p> <p>52</p> <p>53</p> <p>54</p> <p>55</p> <p>56</p> <p>57</p> <p>58</p> <p>59</p>	<p><i>adverse effect</i> under Section 106 (for archaeological resources, historic, and cultural landscapes).</p> <p>b. Ethnographic. Suggest spelling out or footnoting what TCP is.</p> <p>c. Wetlands (Pg. 144). For the final GTSR/FEIS the park should confirm with the U.S. Army Corps of Engineers (Corps) if they agree with no guarantee to wetland mitigation if a Major Impact occurs. Usually, monitoring is required to regulate success, and if not successful, subsequent mitigation is usually required. Also, to not guarantee wetland mitigation seems inconsistent with Executive Order 11990.</p> <p>d. Threatened and Endangered Species and Species of Concern (Pg. 145). For the final GTSR/FEIS the park should confirm with the FWS if they agree that an affect that exists to Threatened & Endangered (T&E) species, although negligible, equates to a <i>no effect</i> under Section 7 of the Endangered Species Act (ESA).</p> <p>e. Environmental Justice. On page 146, suggest replacing 'low income areas' with 'low income and minority populations'.</p> <p>2. CUMULATIVE EFFECTS. Figure 22 on page 149 is a great idea. Suggest providing a clearer copy.</p> <p>3. REASONABLY FORESEEABLE ACTIVITIES.</p> <p>a. National Forest Activities. On page 150, might harvesting activities also have an additional effect to increased sediment?</p> <p>b. Table 30. Suggest adding CSP activities (pg. 150) under Glacier National Park Activities (page 148).</p> <p>4. CULTURAL RESOURCES. Somewhere between pages 176 to 180, it might be very beneficial to also state what the impact is (by alternative) as assessed under Section 106, including documentation of SHPO's concurrence through Section 106 consultation.</p> <p>5. NATURAL RESOURCES</p> <p>a. Topography, Geology, and Soils. Under '<i>Cumulative Effects</i>' on page 183, without additional data, it is not clear how the conclusion was reached, "Timber salvage and restoration activities...may result in an increase in soil erosion, but the incremental effect of soil loss...would not add appreciably to the cumulative effect". Is this specific to the Moose Fire site?</p> <p>b. Threatened and Endangered Species and Species of Concern. For all the T&E species from page 197 to 200, suggest also listing the effects using Section 7 ESA language.</p> <p>c. Wilderness and Wild and Scenic Rivers. What equates to a 'direct disturbance' for wild and scenic (W&S) rivers as noted on page 211? Is this direct into the W&S River or within its designated corridor?</p> <p>4</p>	<p>49. Traditional Cultural Properties (TCP) was spelled out in Table 29.</p> <p>50. The impact threshold definition for a major wetland impact has been modified. All wetland impacts would be mitigated regardless of the extent of the impact for all alternatives.</p> <p>51. The U.S. Fish and Wildlife Service will make a determination on the significance of affects to threatened and endangered species in a Biological Opinion. See response to comment 260-22.</p> <p>52. The suggested edit was made in the FEIS.</p> <p>53. Improvements in printing were made in the FEIS.</p> <p>54. Additional discussion on cumulative impacts for Forest Service salvage operations was added to the <i>Water Resources</i> section of Chapter 4 in the FEIS.</p> <p>55. The Commercial Service Plan was added to Table 30.</p> <p>56. Section 106 consultation for the selected alternative would be conducted prior to each phase of rehabilitation. See response to comments 23-1 and 260-17.</p> <p>57. Timber salvage operations associated with the Moose Fire may result in erosion, which could result in a cumulative loss of soil resources for the greater GNP region. The proposed Going-to-the-Sun Road rehabilitation would have a negligible to minor contribution to regional soil loss when combined with the potential effect of the timber salvage operations on the Moose Fire. Additional discussion was added to the section on <i>Topography, Geology, and Soils</i> in Chapter 4 of the FEIS. See response to comment 260-54.</p> <p>58. The NPS determination of effects for threatened and endangered species was added to the FEIS.</p> <p>59. A direct effect to Wild and Scenic Rivers would include an impact within the designated corridor.</p>

Summary of Comments From Individuals

Alternatives and Visitor Use Improvements

Locate the Westside Discovery Center adjacent to Lake McDonald.

The *General Management Plan* determined that the preferred location for the Westside Discovery Center is in the Apgar Village area near the intersection of the Camas Creek Road and the Going-to-the-Sun Road. While not directly on the shore of Lake McDonald, this location provides ready access to incoming visitors, proximity to the lake, Apgar Village, and campground.

Traffic on the Going-to-the-Sun Road should be limited to guided tours rather than commercial or private vehicles.

Closing the Road to private vehicles was considered in the *General Management Plan* (GNP 1999b) and rejected during that planning process. Private concessioners currently provide tour services along the Road. These tours provide a unique experience for visitors. Shuttle service is also currently available on a limited basis and the preferred alternative includes continued tours by concessioners and expansion of shuttle service. The NPS strives to provide a balance of transportation options to the public, including access to the Road by private vehicles.

The parking area at Logan Pass should be expanded.

Expansion of the Logan Pass parking lot was evaluated in the *General Management Plan* (GNP 1999), but was eliminated because of adverse impacts to sensitive alpine plant communities, loss of wildlife habitat and additional disturbance to wildlife from more visitors, the degradation of the visual quality of the area, and potential erosion and water quality concerns. Proposed expansion of shuttle service along the Road would provide visitors with an alternate means of accessing Logan Pass during peak periods when parking congestion is high.

Road rehabilitation should consider the addition of a shoulder or bike lane.

Substantial Road widening would be needed to accommodate a bike lane. This would have significant adverse impacts on the historic character of the Road and cultural resources and values. Most of the high-elevation portions of the Road cannot be widened easily because of the steep terrain and resource damage that would occur. The decision to not widen the Road was made in the *Glacier National Park Transportation Plan* (NPS 1990) and reaffirmed in the *General Management Plan*.

The NPS will continue to allow bicycling on designated roads in the Park and proposed roadway improvements and paving will provide safer conditions for bicyclist; however, restrictions on bike travel during peak visitor use periods would continue similar to current conditions.

Consider a combination of the Priority Rehabilitation Alternative (Alternative 2) and the Accelerated Completion Alternative (Alternative 4).

The Priority Rehabilitation alternative and Accelerated Completion alternative are distinguished by the amount of annual funding for rehabilitation, level of transit service, the number of visitor use improvements, and the traffic management plan. Applying the Accelerated Completion alternative schedule to the Priority Rehabilitation alternative would complete the work sooner, but would include lower levels of transit service and fewer visitor use improvements and mitigation measures. The NPS believes that the Priority Rehabilitation Alternative does not meet the needs of the Going-to-the-Sun Road and that the Shared Use alternative (preferred) provides the best combination of timely road rehabilitation and visitor use improvements.

Do not allow recreational and commercial vehicles to drive the Road.

Vehicle size restrictions of no wider than 8 feet or no longer than 21 feet will remain in effect between Avalanche and Sun Point following Road rehabilitation. These size limitations restrict use of the Road by most motor homes, trailers, and large trucks. Further temporary size limitations may be necessary during rehabilitation on sections of the Road.

The time estimate for Road rehabilitation is unrealistic because of the short construction season.

As directed in the 1999 Appropriation Bill, an independent engineering firm with professional experience on roads in mountainous alpine conditions was hired to evaluate the Road's condition and develop feasible rehabilitation alternatives. Washington Infrastructure Services was the selected firm. It looked at elements such as the mountainous winter environment and short construction season in forming the alternatives. The alternatives in this document are based on the *Engineering Study* Washington Infrastructure provided to NPS and recommended by the Citizen's Advisory Committee.

The cost estimate for rehabilitation of the Road seems unrealistic.

Washington Infrastructure Services spent almost two years developing and evaluating the condition of the Road, determining the needed repairs, and estimating the time and costs associated with Road rehabilitation (*Engineering Study*, WIS 2001a). The results of that study are the best available estimate of the anticipated construction schedule and cost for each alternative. More detailed cost estimates would be developed during final design for each phase of rehabilitation.

Consider a rail system for the Road rather than rehabilitation to accommodate private vehicles.

The conversion of the Going-to-the-Sun Road into a rail system was considered in the *General Management Plan*, but was rejected. The tracks and cables associated with a rail or cog system would be incompatible with the historic appearance of the Road and would preclude private automobile use, which is historic and valued by visitors.

Close the Road completely until roadwork is finished.

Complete closure of the Road was not considered as a feasible alternative because of the significant adverse effects on visitation, recreation opportunities, local businesses, and the regional economy. The preferred alternative provides a balance in completing the necessary Road rehabilitation in a timely and cost effective manner, while allowing continued visitor access and minimizing impacts to environmental resources and local businesses. An alternative that closes one side of the Road and then the other was considered in the *General Management Plan*. This alternative was considered, but rejected as discussed in the *Alternatives and Mitigation Excluded from Further Consideration* section in Chapter 2 of the FEIS.

Establish a task force with several engineering firms and contractors to develop alternatives for Road rehabilitation.

A range of feasible alternatives was considered in this EIS as well as the previous *General Management Plan*. A Citizens Advisory Committee participated throughout the development of alternatives during the preparation of an *Engineering Study*, *Socioeconomic Study*, *Transportation and Visitor Use Study*, and a *Cultural Landscape Inventory and Report*. The private consultant, Washington Infrastructure, consulted with several other engineering firms and contractors to develop the findings and recommendations in these studies. The alternatives considered in the EIS present the culmination of over two years of investigation, analysis, and discussion by a diversity of interests including, the Federal Highway Administration, Tribal communities, the National Park Service, consulting experts in engineering and economics, representatives from local and regional governments, and local business interests. The NPS believes the process described above accomplished this suggestion.

Additional roadside vegetation management is needed to create scenic views.

All of the alternatives include vista clearing to restore the scenic views that were historically present along the Going-to-the-Sun Road. The NPS will implement these measures on a selective basis according to existing Roadside Maintenance Guidelines and vegetation management direction to maintain vistas and sight distances along the Road. Vista clearing will continue to maintain and preserve the historic character of the Going-to-the-Sun Road and the traits that contributed to its designation as a National Historic Landmark.

The cost and schedule should be adjusted for bad weather.

The costs and scheduling estimates for the different Road rehabilitation alternatives include consideration for bad weather.

Mitigation

Consider compensating businesses for lost revenues during Road rehabilitation.

Direct compensation to businesses impacted by the Road rehabilitation is beyond the authority of the NPS. For the preferred alternative, the NPS is implementing several measures to encourage tourism to the Park during rehabilitation including improvements to existing pullouts, additional exhibits and interpretative information, additional transit service, improvements to the St. Mary Visitor Center, and construction of a Westside Discovery Center. In addition, the Park would work with local businesses and the public to clearly communicate the status of Road rehabilitation and any restrictions on access. There also may be additional opportunities for businesses to promote their services.

Consider improving access and promoting the west side of the Park via the Inside North Fork Road or outside North Fork Road during rehabilitation of the Going-to-the-Sun Road.

The Inside North Fork Road provides access to Polebridge, Bowman Lake, and other west side features in the Park. The NPS will encourage use of this area by visitors during rehabilitation work; however, road conditions and fewer visitor amenities affect the amount of visitation in this portion of the Park.

The outside North Fork Road in Flathead National Forest, located just outside the western boundary of GNP, currently provides access to the Canadian border. Currently the border crossing is closed and we are not aware of any plans to re-open this crossing. While some visitors may enjoy the remoteness of this unpaved route, road conditions and long distances are unlikely to make this a popular destination.

The NPS should facilitate communication with the public about the status of the Going-to-the-Sun Road and emphasize that it will remain open during rehabilitation.

One component of the proposed mitigation plan to be implemented by the NPS during rehabilitation is increased communication with the public, local businesses, concessioners, and tourism-related organizations on the status of the Road. Alternatives 3 and 4 include additional funding for new seasonal NPS staff to implement a public information system to aid visitors and local businesses. In addition, an Intelligent Transportation System would provide real-time data on the status of the Road and other activities. Under the Preferred Alternative, the entire Going-to-the-Sun Road would be accessible for visitors during the peak season, subject to short daytime traffic delays and longer traffic delays at night. During the early and late shoulder seasons, over 80 percent of the Road would remain open to public travel.

Create more opportunities for visitors to see other portions of the Park and provide additional interpretative material.

The visitor use improvements included primarily in Alternatives 3 and 4 would provide additional opportunities for visitors to enjoy the Park. In addition, the NPS intends to promote other attractions and portions of the Park not under construction to disperse use and encourage visitors to explore other sites. Mitigation measures include additional information, exhibits, and orientation materials for visitors. At any given time, for any of the alternatives, no more than 20 percent of the Going-to-the-Sun Road would be actively under construction.

Transit System

Would the shuttle system provide frequent stops?

The transit system would include shuttle stops at popular attractions, pullouts, trailheads, and parking areas throughout the length of the Road. Approximately 17 transit stops are anticipated.

Expand shuttle service to meet the current parking shortage.

The rehabilitation of the Road includes improvements in the layout and efficiency of existing roadside pullouts. There would be only a marginal increase in available parking space, primarily from improved configuration of existing parking areas. Proposed expansion of shuttle service is believed to be one of the primary methods to alleviate traffic and parking congestion rather than construction of substantial new infrastructure. The best available projections indicate a very minor growth in Park visitation over the next 20 years. Incremental expansion of shuttle service is one option to meet future visitor demand.

A transit system should not replace the individual's ability to access the Road in private vehicles.

The NPS has no plans to eliminate private vehicles from the Going-to-the-Sun Road; however, we encourage visitors to take advantage of other transportation options, including concession tour vehicles, the existing shuttle system, and the proposed expanded shuttle system if selected for implementation.



As the nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering sound use of our land and water resources; protecting our fish, wildlife, and biological diversity; preserving the environmental and cultural values of our national parks and historical places; and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people by encouraging stewardship and citizen participation in their care. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.

NPS D-421/April 2003