



Chapter 5 Consultation and Coordination





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INTRODUCTION

This chapter describes the history of public involvement prior to and during the development of the *Draft Commercial Services Plan and Draft Environmental Impact Statement*. It summarizes coordination with federal and state agencies and tribal governments, and lists agencies, organizations and individuals that received copies of the document.

PUBLIC INVOLVEMENT

Public involvement in the planning process helps to ensure that the National Park Service understands and considers the public's interests when considering alternatives and making decisions about public lands. Public involvement activities provide the means for the public to participate in the planning process, identify issues and alternatives, and express thoughts, ideas, and concerns. Public participation helps to identify the types of actions to be included in the plan, as well as the range of alternatives and impacts that should be addressed. In addition to public involvement during the commercial services planning process, extensive opportunities were offered to the public to comment on commercial services during the development of Glacier National Park's 1999 *General Management Plan and Environmental Impact Statement* (NPS 1990c). The comments submitted during that process were also considered during development of the *Draft CSP and Draft EIS*.

The following concerns were expressed by the public during the development of the *General Management Plan and EIS* that are relevant to the *Draft CSP and Draft EIS*:

Continue Current Access and Visitor Use

An overwhelming majority of comments objected to the possibility of losing public access and visitor opportunities and strongly expressed a desire to keep the park "as it is." Most people want visitor facilities to be retained, including ... grand hotels and other lodging, and campgrounds. The majority said they would like other traditional uses of Glacier National Park to continue,...

Manage the Park to Protect Resources, While Allowing Visitor Use

Most who commented about natural and cultural resources asserted that the park's

paramount priority should be to protect these invaluable assets and lessen the impact of visitation whenever possible. They went on to say that human use consistent with preserving these resources must continue, that people are now part of Glacier's ecosystem, and that habitat can be protected without keeping people out.

Preserve Wildlife Habitat

Most respondents said that they believe that wildlife is central to a true Glacier National Park experience and that habitat should be preserved. Those who commented about wildlife also stressed the need to minimize interactions between animals and people.

Emphasize the Retention of Facilities In the Park

Commenters said that removing facilities from inside the park and replacing them outside the park would result in a loss of valued traditional visitor experience. The public generally did not favor moving facilities outside the park. (NPS 1999c, 6-8)

SCOPING FOR THE COMMERCIAL SERVICES PLAN

The scoping period for the *Draft CSP and Draft EIS* began with the publication of the "Notice of Intent" in the *Federal Register* on September 12, 2000. As part of the process, a scoping newsletter was made available to the public in November 2000, a Commercial Services Plan Web page was established, and five open houses were held in December 2000. The newsletter introduced the *Commercial Services Plan/Environmental Impact Statement*, explained what commercial services are and what the plan would do, and reviewed decisions reached in the 1999 *General Management Plan and Environmental Impact Statement* regarding commercial services. The newsletter also introduced the Commercial Services Plan Web page and invited the public to attend public open houses. Individuals or groups were also invited to share comments, concerns, and ideas by using the online response form or mailing comments to the park by December 30, 2000. Meetings were held with the Blackfeet Tribal Council, private landowners in Apgar and special interest groups.

The Commercial Services Plan Web page provided the public with information on the plan and planning process, identified opportunities for the public to provide comments and ideas, and made available an online comment form.

Open houses were held in Kalispell, Missoula, Great Falls, and Browning, Montana, and in Lethbridge, Alberta, Canada, in December 2000. Approximately 250 people attended.

TABLE 5-1. PUBLIC OPEN HOUSES FOR THE COMMERCIAL SERVICES PLAN

Location	Date	Number of People in Attendance
Kalispell, MT	December 4, 2000	92
Missoula, MT	December 5, 2000	43
Great Falls, MT	December 6, 2000	25
Browning, MT	December 7, 2000	31
Lethbridge, Alberta, Canada	December 7, 2000	56

Over 200 comments were received from the public during the scoping period. These comments were in the form of letters, Web site responses and comments recorded at open houses. In addition, notes on public comment at the public meetings were captured on flip charts and retained as part of the record. Public comments fell into several categories.

- **Lodging Facilities**

Respondents generally said that traditional lodging experiences are important to the character of Glacier National Park and that overnight accommodations should continue to be provided in the park. Most comments supported the rehabilitation of existing lodging facilities but objected to new development in the park. Generally, comments raised objections to an increased number of rooms for overnight accommodations, but suggested small expansions of currently developed areas, such as expansions of the cabins at Rising Sun and Swiftcurrent.

Respondents favored keeping the park as it is and rehabilitating the historic lodging facilities to reflect their primary motif. The public generally said that facilities should be rehabilitated but should maintain a rustic character with few added amenities.

- **General Visitor Services**

While the majority of respondents strongly objected to the commercialization of the park in general, many comments made specific suggestions regarding visitor services. Respondents suggested adding services, such as coin-operated laundry facilities, additional shower facilities, more convenience stations, picnic tables outside the cabins at Swiftcurrent, galleries for local arts and crafts, a small-scale food/drink service at Logan Pass, and expanded services in the North Fork area. Some comments also favored limited retail sales by more than one concessioner.

- **Natural Resources**

Most people who commented on natural resources said that the park's first priority should be to protect natural resources and lessen the impact of visitation while continuing to provide visitor services. Respondents expressed concern about impacts to wildlife, habitat loss, water quality, noxious weeds management, soil compaction, and noise pollution. Commenters also said that the park must be managed to preserve its wilderness characteristics.

- **Affordability**

Many respondents expressed concern that visitor services and facilities would become too costly. They went on to say that some facilities, such as Swiftcurrent and Granite Park Chalet, should be kept affordable. Commenters were also concerned that park entrance fees would increase as a result of hotel rehabilitation.

- **Funding**

Comments expressed a wide range of opinions regarding rehabilitation funding. Suggestions to fund rehabilitation include using taxpayer money, increasing park fees or park lodging rates, using a percentage paid by the concessioner, using private money, and using National Park Service allocated funds.

- **Guided Activities**

Most people who commented on guided activities said that group size limits should be placed on all guided activities.

- **Transportation**

Several respondents suggested that a shuttle system should be implemented in the park. Many respondents said that they would like a shuttle system that would transport hikers and visitors between visitor service areas and trailheads within the park. Other respondents favored a shuttle system that would transport visitors from areas outside of the park into the park. Participants also said that they would like the park to keep the red bus tours and to make them affordable for everyone.
- **Horses**

The majority of people who commented on horse use support public and private horseback riding facilities in the park. Most respondents expressed a desire for the park to expand the horse trail system and provide more horse facilities at campgrounds and trailheads. Several comments suggested that horse campgrounds and trails should be kept separate from general campgrounds and trails, and a few comments suggested eliminating horse traffic on trails.
- **Employee Housing**

Of the few comments received regarding employee housing, all stated it should be placed outside of the park and that no new employee housing should be constructed inside the park.
- **Campgrounds**

Comments received regarding campground facilities reflected various opinions. While some commenters said that campgrounds should remain primitive and that no additional RV sites should be added, the majority of commenters expressed a desire for campgrounds to be upgraded and expanded. Respondents suggested providing more services in campgrounds, allowing more sites for RVs, revegetating campgrounds between sites to provide privacy, and providing camping in additional areas of the park. Commenters also indicated that campground rates are too high and should be kept commensurate with facilities/services provided.
- **Chalets**

Various comments were received regarding chalets. Most of these comments supported the continued operation of chalets as they are now with the option of using Granite Park Chalet as a hiker shelter and Sperry Chalet as a full service lodging facility. However, some commenters supported repairing Granite Park Chalet as a full service chalet. A few respondents expressed concern about the impacts of chalets on wildlife and said that chalets should be phased out completely.
- **American Indians**

Comments stated that American Indians should be involved in park interpretation and commercial services. Commenters also wanted to ensure that local tribes would be allowed to use the park for religious and cultural purposes.
- **Length of Season**

While many commenters expressed concern that an extended park season would adversely impact wildlife, other respondents supported off-season use of the park. Many respondents suggested that existing roads should be groomed in the winter for cross-country skiing and snowshoeing. They also suggested that winterized day lodges should be operated in at least one location on the east

side of the park and one location on the west side of the park. One commenter also said that the park should be opened for therapeutic recreation programs during the winter.

- **Boats**

The majority of people who commented on boats said that they favor small-scale boat tours and the use of private boats on park lakes. Others suggested that limits should be placed on the amount of horsepower allowed in boats that can be used in motorized use areas and that the amount of guided float trips should be reduced.

- **Fishing**

One commenter said that lakes should be stocked with fish again.

- **Bicycling**

One commenter suggested that bicycle accessibility should be maximized in developed areas.

SUMMARY OF PUBLIC COMMENT AND INVOLVEMENT AFTER RELEASE OF THE DRAFT COMMERCIAL SERVICES PLAN AND DRAFT ENVIRONMENTAL IMPACT STATEMENT

The *Draft Commercial Services Plan and Draft Environmental Impact Statement* was released to the public in May, 2003 for a 60-day review period. Comments were initially due July 30th, but due to the extreme fire season in and around the park, the comment period was extended until August 15th. Public open houses and hearings were held during the month of June in Kalispell, Missoula, Browning and Great Falls, Montana and in Lethbridge, Alberta, Canada. Approximately 70 people attended these meetings.

By the end of the comment period, Glacier National Park had received approximately 430 written comments, including transcripts of the testimony heard at the meetings, and comments received by telephone and email. No form letters were received. Every letter, email and transcript was numbered and read by members of the park staff. Substantive comments, as defined by the National Environmental Policy Act, are those that question either the range of alternatives or the accuracy of the information in the document, or comments that correct misinformation or offer new alternatives and issues not addressed in the draft plan. We have responded to letters that contained substantive comment in Chapter 5 Consultation and Coordination.

Most of the comments received were supportive of the Plan and preferred alternatives, with some notable exceptions. The services and preferred alternatives that drew the heaviest comment were the future of Granite Park Chalet, guided motorcycle tours, guided bicycle tours, the numbers proposed for group size on guided hikes, guided underwater diving, guided horseback rides and some of the proposals at the developed areas. Public comments are summarized below.

AGENCY COORDINATION

Agency coordination is essential for the identification of potential environmental impacts of a project and its alternatives. It also provides information regarding other agency planning efforts and proposed plans for a project area that contributes to the analysis of cumulative impacts.

Agency coordination was accomplished through correspondence, telephone communication, and review of project-related materials. Letters were sent to the U. S. Fish and Wildlife Service, the Montana State Historic Preservation Officer, the Montana Department of Environmental Quality, the Montana Department of Natural Resources and Conservation, and the Montana Department of Fish, Wildlife and Parks. Additional meetings, review and discussion have occurred with the U.S. Fish and Wildlife Service and the State Historic Preservation Office. All written correspondence received from agencies prior to release of the draft is contained in Appendix 5.

During the public comment period of the Draft CSP and Draft EIS, agency comments were received from the U.S. Environmental Protection Agency, the Montana Department of Environmental Quality. A letter was received from the Blackfeet Tribal Business Council and a meeting was held with the Council on May 1, 2003.

RECIPIENTS OF THE DRAFT COMMERCIAL SERVICES PLAN AND DRAFT ENVIRONMENTAL IMPACT STATEMENT

Elected Officials

Max Baucus, United States Senate
Conrad Burns, United States Senate
Flathead County Commissioners
Glacier County Commissioners
Judy Martz, Governor of Montana
Fred Matt, Chair, Confederated Salish and Kootenai Tribal Council
James St. Goddard, Chair, Blackfeet Tribal Business Council
Dennis Rehberg, United States House of Representatives

Federal Agencies

Department of Interior, Office of the Solicitor
Flathead National Forest
Kootenai National Forest, USDA, Supervisor's Office
Lewis and Clark National Forest
U.S. Army Corps of Engineers
U.S. Environmental Protection Agency
U.S. Fish and Wildlife Service
Advisory Council on Historic Preservation

Canadian Government Agencies

Waterton Lakes National Park

State and Provincial Agencies

Montana State Historic Preservation Office
Montana State Clearinghouse
Montana Department of Fish, Wildlife and Parks

Organizations

Anti-Cruelty Society
Backcountry Horsemen
Browning Public County Library
Coalition for Canyon Preservation

Columbia Falls Branch Library
 Cut Bank Library
 Flathead Conventions Bureau
 Flathead County Library
 Flathead Economic Development Corporation
 Friends of the Bitterroot
 Glacier Country Regional Tourism Commission
 Glacier Natural History Association
 Glacier Park Associates
 Glacier Park Foundation
 Glacier-Waterton Visitor Association
 Great Falls Public Library
 Great Falls Tribune
 Missoula Public Library
 Montana Wilderness Association
 Montanans for Multiple Use
 National Parks Conservation Association
 Partners in Parks
 Trust for Public Lands
 Whitefish Branch Public Library
 Wild Wilderness
 Wilderness Society, Northern Rockies Regional Office

Concessioners

Belton Chalets, Inc.
 Glacier Park Boat Company
 Glacier Park, Inc.
 Glacier Wilderness Guides, Inc.
 Mule Shoe Outfitters, LLC
 Sun Tours
 Waterton Inter-Nation Shoreline Cruise Company, Ltd.

A complete listing of individuals who received a copy of the *Draft CSP and Draft EIS* is on file at Glacier National Park.

LIST OF PREPARERS

Name and Title	Responsibility/ Contribution	Education	Years Exper- ience
Architectural Research Consultants, Incorporated			
John P. Petronis, AICP, AIA, Architect/Facility Planner	CSP Purpose and Need, Site Planning, Site Alternatives Planning	M. Business Administration M. Architecture	29 years
Robert W. Robie, AIA, Architect/Facility Planner	CSP Project Overview and Coordination	M. Architecture	28 years
Andy Aguilar, Facility Planner/ Intern Architect	CSP Site Analysis, Site Alternatives Planning	M. Architecture	19 years

Name and Title	Responsibility/ Contribution	Education	Years Exper- ience
Jennifer Abbott, Technical Editor	CSP/EIS Production	M.A. English	27 years
Stephen Burstein, Planner, AICP	CSP/EIS Socioeconomic Environment, Impacts	Master of Urban and Regional Planning	18 years
Bethann McVicker, GIS Specialist	CSP/EIS GIS and Mapping Production	B. S. Anthropology	9 years
Flo Padilla, Graphics Specialist	CSP/EIS Mapping Production	A. Architectural Drafting	14 years
Jay Petronis, Assistant Graphics Professional	CSP/EIS Computer Graphics and Site Plans	B.A. Fine Arts	10 years
Janice Schmitz, Graphics Specialist	CSP/EIS Computer Graphics	B.A. Fine Arts	14 years
Cherry / See Architects			
Edith Cherry, FAIA, ASLA, Architect, Landscape Architect	Historic Structures Reports and Cultural Landscape Reports	M. Architecture	37 years
National Park Service–Glacier National Park			
Mary Riddle Cornell, Environmental Protection and Compliance Specialist	Project Leader, Plan and EIS	B.S. Environmental Studies	19 years
Jan Knox, Chief, Concessions Management	Project Leader, CSP Statement, Prescriptions and Standards, Necessary and Appropriate Services	B.S. Business Administration	23 years
Fred Babb, Chief, Project Management	Project Leader, Site Design and Analysis	B.L.A. Landscape Architecture and Planning	36 years
Tara Carolin, Ecologist	EIS Document Review and Compilation	M.S. Wildlife and Range Resources	12 years
Dave Lange, Supervisory Biologist	EIS Document Review and Compilation	B.A. Wildlife Conservation	33 years
Jennifer Asebrook, Biological Sciences Technician	EIS Vegetation, Wetlands	M.S. Plant Ecology	13 years
Gordon Dicus, Biological Sciences Technician	EIS Vegetation, Wetlands, Aquatics	M.S. Wildlife Biology in Progress B.S. Biology	5 years
Kimberly D. Frymire, Biological Sciences Technician	EIS Vegetation	B.S. Biology B.A.E. Secondary Education	5 years
Steve Gniadek, Wildlife Biologist	EIS Wildlife	M.S. Wildlife Biology	31 years

Name and Title	Responsibility/ Contribution	Education	Years Exper- ience
Meg Hahr, Biological Sciences Technician	EIS Wildlife, Aquatics	M.S. Environmental Studies	6 years
Joyce Lapp, Supervisory Horticulturist	EIS Vegetation	B.S. Soils Science B.S. Horticulture	17 years
Dr. Leo F. Marnell, Senior Scientist	EIS Aquatics	Ph.D. Aquatic Ecology	30 years
William Michels, Biologist	EIS Aquatics	B.A. Park Administration	32 years
Rick Yates, Biological Science Technician	EIS Wildlife	M.S. Wildlife Biology	23 years
Richard Menicke, GIS Manager	GIS Mapping Support	M.S. Environmental Sciences	12 years
Lon Johnson, Cultural Resources Specialist	Cultural Resources	B. Architecture	24 years
Jack Potter, Assistant Chief Resources Management	EIS Document Review	B.A. Political Science B.S. Forestry	34 Years
Allison Rowland, Biological Sciences Technician	EIS Document Preparation	M.S. Biology	1.5 years
John Waller, Wildlife Biologist	EIS Wildlife	M.S. Fish and Wildlife Management	15 years
Dekker, Perich & Sabatini			
Michael Burkett, AIA, Architect	CSP Site and Contextual Analysis and Design	B. Architecture	14 years
Paul Cavin, Intern Architect	CSP Site and Contextual Analysis	B.S. Concentration in Architecture	9 years
Lynn McClain, AIA, Architect	CSP Design, Planning, Presentation	B. Architecture	32 years
Patti Van Leer, Presentation Specialist	CSP Graphics and Presentation	M. Architecture	19 years
Johns A.S.L.A.			
Robert Johns, ASLA, Landscape Architect	CSP Site Analysis, Site Alternatives Planning	B. Landscape Architecture	43 years
Land & Water Consulting, Inc.			
Barry Dutton, Certified and Registered Professional Soil Scientist	EIS Soils	M.S. Forestry and Soil Science in Progress B.S. Forestry	28 years
Larry Read & Associates			
Larry D. Read, PE, Civil Engineer	CSP Utilities	B.S. Civil Engineering	19 years

Name and Title	Responsibility/ Contribution	Education	Years Expe- rience
Marron and Associates, Inc.			
Ken Marron, Senior Environmentalist/ Planner	NEPA Specialist, EIS Project Overview	M.C.R.P. Environmental Planning	42 years
Shari Grossarth	EIS Project Leader, Environmental Consequences	B.S. Conservation Biology	4 years

CONTRIBUTORS

National Park Service–Glacier National Park

Michael Holm, Superintendent
 Suzanne Lewis, Superintendent until Feb. 02
 Pete Hart, Acting Superintendent, Feb. 02-August 02
 Jerry O’Neal, Assistant Superintendent
 Denis Davis, Assistant Superintendent until Feb. 02
 Gayle Burgess, Park Architect
 Jerry Burgess, Park Civil Engineer
 Jack Gordon, Park Landscape Architect
 Jack Polzin, Section 106 Review
 Dave Dahlen, Chief of Interpretation
 Bill Hayden, Interpretation
 Dayna Hudson, Project Management Assistant
 John Kilpatrick, Chief of Facilities Management
 Bernadette Lovato, Concessions Management
 Karene Manus, Concessions Management

Charlie Logan, Park Ranger

Magi Malone, Librarian

Kris Meredith, Concessions Management

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National Park Service–Intermountain Region

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GLACIER NATIONAL PARK RESPONSES TO SUBSTANTIVE COMMENTS ON THE DRAFT COMMERCIAL SERVICES PLAN AND DRAFT ENVIRONMENTAL IMPACT STATEMENT

We received 431 comment letters and testimony at public hearings on the *Draft Commercial Services Plan and Draft Environmental Impact Statement*. All comment letters were reviewed to determine which comments were substantive.

Comments, as defined in NPS-12: NEPA Compliance Guidelines, are considered substantive if they:

- Question, with reasonable basis, the accuracy of the information in the environmental impact statement
- 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

Since many letters from individuals contained identical substantive comments, we have summarized them in the section, “Grouped Responses to Individual Comments.” Each comment is followed by our response.

Following the grouped responses is the section, “Responses to Individual Comments” with facsimiles of the letters we received from federal agencies, elected officials, state agencies, tribal governments, organizations, concessioners, other businesses and special interest groups that contained substantive comment. Beside each reproduced letter or hearing testimony is our response.

Where appropriate, changes were made to the *Final Commercial Services Plan and Final Environmental Impact Statement*. If changes were made in response to a comment, they are noted in the response.

GROUPED RESPONSES TO INDIVIDUAL COMMENTS

Granite Park Chalet

- 1. We cannot visit Granite Park Chalet under limited services because we cannot carry in the equipment we would need for an overnight stay. Leaving the chalet as a hiker shelter makes it less accessible to many visitors including families, the elderly, city dwellers and the less able.***

The National Park Service received many comments regarding the inability of individuals to carry full packs into Granite Park Chalet, revealing some confusion about what the level of service is that is currently offered at the Chalet. There are currently several options for a trip to Granite Park. Linens may be rented at the chalet, which negates the need to carry in your own bedding. There is some food (in the form of backpacker meals) available for purchase, and the kitchen is completely equipped for cooking. Many comments from guests at the chalet expressed surprise and delight at the availability of food and kitchen supplies. Therefore, guests do not need to bring bedding or cooking supplies, and may only need to bring a minimal amount of food and their own personal gear similar to what they would need at Sperry Chalet. Additional transport services may be arranged with a concessioner to pack personal gear in for guests. A guided hike option including

meal preparation is also available to visitors. These options eliminate the need for guests to carry heavy packs to the chalet for an overnight experience, and make the chalet more accessible to less able visitors. A backcountry facility by definition may not be totally accessible to all people. There are other overnight facilities in the park that provide full services for guests, but part of the experience of the backcountry chalets is the effort to get to them. The National Park Service wishes to provide a full range of opportunities for visitors to experience the park. The lower cost of Granite Park Chalet is considered by many to be an attractive option for a backcountry experience.

2. *Glacier National Park should establish an affordable chalet system or hiker huts throughout the park.*

It is unfortunate that so many of the historic chalets that once existed in Glacier National Park have been removed, torn down or burned. Most of the park's backcountry is proposed wilderness, and is managed as such. National Park Service management policy prohibits the construction of permanent structures in proposed or designated wilderness.

3. *The park should build another structure for a hostel at Granite Park, and return the chalet to full services.*

Other than addressing the utility system, the National Park Service does not think it is appropriate to construct new structures and expand the capacity at Granite Park.

4. *We were told that if Granite Park Chalet was not converted to a full service facility, it would be closed down completely.*

This information is incorrect.

5. *The Granite Park Chalet experience as a hiker shelter is lacking because the traditional full-service operation included staff trained to offer opportunities for environmental education.*

We appreciate your comments, and those of many others, regarding the need for educational services at the chalet. Under the terms of the next concession contract, the concessioner will offer educational opportunities at the chalet. These opportunities will be informal and formal.

6. *The park should return the chalet to providing full service or its integrity as a national historic landmark will be affected.*

The national historic landmark nomination was based on architectural significance and not on the level of services provided.

7. *The park should assess a surcharge for visitors to Granite Park Chalet to fund the wastewater disposal system in order to provide full services.*

A surcharge to fund waste disposal would be impractical. For a surcharge to fully fund the proposed improvements in alternative B, at a total cost of \$1.65 million, over 20 years, over the 2,000 people that stay there each summer, the additional cost per person would be about \$50-\$60 per night. In addition to other costs per night at the hiker shelter, the cost would be approximately \$130 per person or \$260 per couple. A period of 20 years would be required to accumulate the capital to fund the improvements. With alternative C, returning to full service, at a total cost of \$2.38 million, the additional charge would be about \$65-\$70 per night, for a total cost of approximately \$400 per night per couple. Furthermore, the funds for these improvements must be provided up front. It should also be noted that currently, the National Park Service subsidizes the utility costs at both chalets by roughly two-thirds.

- 8. *The preferred alternative for Granite Park Chalet is flawed, since the 1993 Environmental Assessment stated that “because of elimination of food and linen service, certain values imbued in the historic visitor use experience would be lost.”***

Under the preferred alternative, linens and some food would continue to be available for purchase by visitors to Granite Park Chalet. We do not feel that these services have been eliminated to the extent of losing “certain values imbued in the historic visitor-use experience,” as you mention.

- 9. *There is no evidence that the quantity of gray water needed for full service could not be handled by the current system or a reasonably priced, revised system.***

We received the compliance order from the Montana Department of Environmental Quality on October 27, 1992, stating that the existing wastewater treatment system was inadequate for the present level of use by both staff and guests, thus forcing us to close the chalet.

- 10. *The comments from the 1993 Environmental Assessment for the Management of Backcountry Chalets should be incorporated into the current Environmental Impact Statement.***

The 1993 Chalet Environmental Assessment was prepared because at that time, it appeared that the National Park Service might be forced to close the chalets to the public. Alternatives to closure were assessed in that EA. Many comments urged the National Park Service to find a solution that would keep the chalets open and retain a highly valued, traditional visitor experience in Glacier National Park. At that time, the public comments overwhelmingly supported a full-service chalet as an alternative to closure. The public comment was based on information presented in the EA on cost and resource impacts which have been determined to be incorrect. New information exists, including the impacts of rehabilitating the chalets, and costs have increased significantly. It would not be appropriate to use public comments that are based on inaccurate or outdated information. However, it should not be assumed that the National Park Service did not consider the comments received on the 1993 EA. While the planning team may not have read each of the letters, many individuals who work at the park participated in that effort and in turn participated in developing the commercial services plan. They brought background and knowledge to the project as we proceeded.

- 11. *We were misled regarding fund-raising for restoring both chalets to full services. Donations were made to “Save the Chalets” with the understanding that we were contributing towards rehabilitating the chalets to offer full services.***

The Save the Chalets foundation (a group that was formed by committed members of the public) pledged to raise \$1.2 million for the \$2-million planned rehabilitation of Granite Park Chalet, but was only able to contribute \$37,000 after expenses. Combined with additional funds provided by the National Park Service, there were only enough resources to rehabilitate Sperry Chalet to a full-service facility and to complete some structural repairs at Granite Park Chalet, costing \$4.5 million to date. Granite Park was reopened to provide overnight accommodations with common cooking facilities.

- 12. *Converting Granite Park Chalet to a full-service hotel is inappropriate or is not in keeping with the General Management Plan, the Organic Act, or the Endangered Species Act. It would degrade the environment, impact wilderness, cause the park to lose historical resources and use limited funds poorly.***

This is not our preferred alternative; however, the General Management Plan recognized that operation of the backcountry chalets is an appropriate use of these historic buildings. The 1974

Wilderness Plan and Recommendation for Glacier National Park created 25-acre enclaves around the chalets within the proposed wilderness.

The Organic Act requires the National Park Service to protect cultural as well as natural resources. Furthermore, the chalet is a national historic landmark. See the response above.

We are consulting with the U.S. Fish and Wildlife Service to assure that we are in compliance with the Endangered Species Act.

The National Park Service preferred alternative would have fewer impacts than the full service alternative, because full service would require a much larger wastewater treatment system. Either of the alternatives preserves and protects these national historic landmark properties. The preferred alternative costs less than the full service alternative.

13. *What is the official position of the Glacier Fund concerning the status of Granite Park Chalet?*

The Glacier Fund is not an advocacy organization, and the board does not take positions on issues; rather, it assists the park in fulfilling its mission by funding projects requested by the park.

Commercially Guided Day Hiking

14. *Group size limits for guided hikes are too large, especially for boat tour groups on specified trails.*

For commercially guided hikes, a 12-person group size would apply to trails in the backcountry zone. Larger group sizes would be permitted on trails in the Day Use Zone. The guided hike group size limits proposed in the plan were derived from park experience, the zone prescriptions in the General Management Plan, and recreational literature. The park feels these limits would ensure a high quality experience. Group sizes of 50 for Grinnell Lake, Grinnell Glacier, and St. Mary Falls Trails would continue to be permitted to accommodate all potential boat tour passengers in order to allow the boat concession to continue to offer guided hikes as part of the service.

15. *There should be limits on group sizes for guided backpacking trips.*

The commercial services plan did not propose any changes to guided backpacking services. These services are currently subject to restrictions on group size; the number of people in a guided backpacking trip is limited to eight per site including the guide, with occasional exceptions made for groups of up to 10 during the shoulder season. There is also a limit on the total number of people per night allowed in the park with the guided backpacking concession.

Guided Underwater Diving Tours

16. *The park should limit the number of underwater diving tour groups per day per site.*

The National Park Service would carefully consider the potential for impacts to park resources when developing an operating plan and contract for guided diving tours. Limits on the number of groups per day per site would be included in the operation plan for this service.

17. *What is the estimate for the number of certified divers who would come to a remote park to dive?*

There are a number of individuals who come to the park for recreational diving; the demand for a commercial guided diving tour service is unknown. The park was asked to consider this activity by local diving companies in the past.

18. *Guided underwater diving tours would represent a tremendous pressure on park resources with additional boat traffic and pollution, and it would be difficult to enforce protective measures.*

We disagree that the tours would represent tremendous pressure on park resources. The contract for such services would be designed to protect park resources, and we do not anticipate a large demand. The park would also develop an operation plan for guided diving tours to protect resources.

19. *Guided underwater diving tours would not appeal to many visitors, and cold waters pose dangers to those who participate.*

The National Park Service included guided underwater diving tours because local diving companies expressed interest in them. There are cultural resources submerged in the lakes that are of great interest to people involved in this activity. The park would take economic feasibility and safety into consideration when developing contracts for concessioners to offer underwater diving tours.

Public Showers

20. *It is unclear which campgrounds would get public showers.*

We would determine where public showers would be added during the design phase. Locations would depend on funding and need for the service.

Boat Tours and Transportation (Boat Taxi)

21. *The park should exclude all motorized boats except the DeSmet, and the DeSmet should be required to have the cleanest, most efficient motor possible.*

This exclusion was considered but rejected by the General Management Plan. Boats with motors greater than 10 horsepower are restricted to four lakes in the park that are not within the proposed wilderness. Three of these lakes have a long history of motorboat use. Motorboat use on these lakes is regulated through maximum noise thresholds (82 decibels at 25 meters [36 CFR §3.7]), “no wake” zones, and seasonal closures to protect resource values. Many of the tour boats currently operating on park lakes have a long history of providing tours in the park. Your suggestion for a clean, efficient motor will be taken into consideration. The concessioner currently uses bio fuels in the tour boats.

22. *There should be limits on the total number of boats allowed per day at each location.*

Alternative B for boat tours would add vessels at Lake McDonald and Two Medicine Lake. The commercial services plan addresses only commercial boat tours. At this time, the National Park Service does not limit the number of private boats on park lakes, and this is outside the scope of

the commercial services plan. There are limits on the numbers of boat tours that are offered each day.

23. *The park should add a water taxi at Waterton Lake.*

There are currently vessels that provide boat tours and transportation on Waterton Lake.

Guided Interpretive Motor Vehicle Tours and Public Transportation Service

24. *The park should encourage use of the red buses to lessen the impacts of private vehicles in the park.*

The red buses have been recently renovated and are in use by the transportation concessioner as tour buses. The concessioner would be the main source of promotion of this service, although the park visitor centers do offer information on bus tours. Other shuttle buses currently provide a less expensive option for shuttling hikers to trailheads. The park will implement an optional shuttle service during the rehabilitation of the Going-to-the-Sun Road that should reduce the impacts of private vehicles.

25. *Commercial shuttling of private vehicles should be restricted from the corridor between Avalanche Creek and Sunrift Gorge and from Logan Pass due to congestion at these parking lots.*

This alternative was considered but rejected because the service was proposed to allow hikers to complete loops by accessing one trailhead and coming out at another. Several popular trails are along the corridor. In addition, this service could result in reduced congestion by allowing hikers to park only one car instead of two.

Commercially Guided Bicycle Tours

26. *Do not impose further restrictions on bicycle tours or cycling.*

The plan addresses only commercial guided bicycle tours, not private cycling. The National Park Service proposes to set a limit to prevent group sizes and the number of groups from becoming excessively large and hazardous, given the traffic congestion and safety issues with traveling the Going-to-the-Sun Road. The Road is maintained at its historical width, which makes bicycle and automobile use tight. There are restrictions on vehicle length and width. There is an hour restriction for bicycles already in place: during the summer season, the Road from Apgar to Sprague Creek and from Logan Creek to Logan Pass is closed to bicycles between 11 a.m. and 4 p.m.

27. *According to the Uniform Vehicle Code, bicycles ARE vehicles.*

The text in Chapter 2 has been changed to read, “The limits on size would be established to ensure a quality visitor experience on these tours and avoid conflicts between **motorized** vehicles and bicycles.”

28. *The plan should indicate that guided bicycle tour regulations would not affect private bicyclists.*

The commercial services plan addresses only commercial services in the park, not private recreation. Private bicyclists would not be impacted by the preferred alternative which limits

group sizes and the number of commercial tour groups that can cross the Going-to-the-Sun Road per day. The text in the plan has been changed to emphasize this.

Guided Motorcycle Tours

29. Guided motorcycle tours would create too much noise to be acceptable in the park. Guided motorcycle tours would create noise and air pollution, and the park could not effectively manage large groups of motorcycles. Guided motorcycle tours should be subject to noise restrictions.

While we initially determined that guided motorcycle tours met at least one of the criteria for “necessary” and all of the criteria for “appropriate” to be considered as a commercial service, we have reconsidered our ability to manage this service in a manner that meets all of the appropriate criteria. In particular, it would be difficult to manage the cumulative noise level from groups of motorcycles in these tours in order to prevent a deleterious impact on the experiences of others using the park. In such an instance, the service would fail to meet the criteria to consider it an appropriate commercial visitor service. Although individual motorcycles are and will continue to be welcome to use the park roads, there is limited support for guided group motorcycle tours as a commercial visitor service. Guided motorcycle tours do not meet the necessary and appropriate criteria and are no longer being considered in this plan.

30. The park should limit the number of guided motorcycle tour groups allowed per day.

Guided motorcycle tours do not meet the necessary and appropriate criteria and are no longer being considered in this plan.

Developed Area Alternatives

31. Lake McDonald Lodge should be open during the winter for overnight and day use. Winter trailhead facilities are needed at Lake McDonald Lodge and Rising Sun.

In the 1999 *General Management Plan and Environmental Impact Statement*, the park did not select the alternative that included providing overnight accommodations in the winter because of questionable economic viability, and the potential for impacts to wildlife. In addition, the National Park Service was concerned about future demands associated with opening the facilities in winter, including requests for transportation such as motorized snow coaches. With the adoption of the selected alternative for winter use in the General Management Plan, the park provides parking at the end of plowed roads.

32. The Stewart Motel should be torn down, not converted to employee housing. What happened to the old plans for employee housing in the Lake McDonald area?

The preferred alternative would not convert the Stewart Motel to employee housing, but it would remove the motel and replace it with new guest motel buildings that better fit the site to address some life safety and code issues with the property. An upgraded motel with parking would make better use of the site and would be more compatible with the historic scene. The site would continue to be used as a motel in order to keep the existing number of rooms in the park. The Stewart Motel is on privately owned land and is owned in fee simple by Glacier Park Incorporated, not the National Park Service. Glacier Park Incorporated or a future concessioner would be responsible for the new building. Local residents would be kept informed during the

design process for this proposal if it is pursued. The previous plans for the Lake McDonald Lodge area were considered but rejected and are discussed in Chapter 2 on page 2-75 of the *Draft CSP and Draft EIS*.

33. *Do not convert the Lake McDonald Post Office area into parking. It would create noise and air pollution near inholder cabins. Expand parking at the Coffee Shop; do not remove it.*

Noise and air pollution should not increase significantly with the proposed reorienting of the parking at Lake McDonald; there are currently several large parking lots in this area.

34. *The park should not pave Swiftcurrent Trail for accessibility.*

Paving of the Swiftcurrent Trail may involve a material other than asphalt. The park has successfully used other materials which resemble soil but meet accessibility guidelines. Glacier National Park is trying to create additional opportunities for visitors who are physically challenged.

35. *Extending the operating dates of the concessioners would make hiring seasonal employees difficult, and could impact wildlife.*

The National Park Service has discussed how alternative types of housing might expand the opportunity to hire from a wider range of the work force, including retired individuals or couples. Impacts to wildlife would be minimized with the help of the Biological Assessment being prepared for the U.S. Fish and Wildlife Service. It describes measures we would implement to minimize impacts to threatened and endangered species, and states that we would revisit operating dates annually to ensure that conditions have not changed significantly.

36. *Housing employees in Motel Units 1, 2 and 3 in Swiftcurrent would not achieve separation of guest accommodations and employee functions.*

The preferred alternative for Swiftcurrent provides good separation of guest accommodations and employee functions and pairs well with the preferred alternative at Many Glacier. Housing employees in the motel units would concentrate employee functions in Area I, and guest accommodations would remain in Area II.

37. *The park should not build additional guest cabins in Area II along the Many Glacier Road.*

Most likely, only two cabin rings would be added given the site constraints and addressing the issue of the sense of arrival. The replacement of Motel 4 by a cabin ring with enough screening and setback between the road and the ring would address the seclusion and concerns about sense of arrival. Turning radius, parking space, lack of screening and noise are all problems associated with the existing parking and cabin relationships. It was thought that the relocation of parking would allow for site enhancements around the cabins.

38. *The park should convert Motel Unit 4 in Many Glacier to employee housing.*

With the relocation of the trailhead to Area III, there would be better separation of visitors and employees by converting Motels 1, 2 and 3 to employee housing.

39. *How can the government offer a commercial service operation to one company without putting the service up for bid?*

The National Park Service does not anticipate offering commercial service contracts to any business without putting the contract out for competitive bid, although the law does allow it in

certain circumstances. In many cases, the National Park Service feels there are economic reasons for a particular service to be operated by a single concessioner. This concessioner would still compete for the contract through the bidding process.

40. *The park should require any new commercial services to recycle waste and participate in a parkwide transit program.*

A requirement of any new concession contract is the development of an Environmental Management System that requires the concessioner to operate sustainably, and reduce waste and resource consumption.

41. *The park should not expand any of the developed areas when current infrastructure is overburdened.*

The park's General Management Plan recommends maintaining a minimum of 500 guest rooms. Addressing health, life safety and ADA compliance issues may result in a loss of overnight rooms. Finding locations for lost rooms may require new construction in developed areas; infrastructure would be improved concurrently to support any new facilities. Utility upgrades and improvements at developed areas were considered beyond the scope of the commercial services plan, and they would be addressed separately as needed.

42. *All commercial services including roads and buildings should be removed from the park.*

The General Management Plan stated that the park will continue to offer services that provide these opportunities to visitors. The National Park Service only allows commercial activities in the park that are consistent with these purposes.

43. *A greater effort should be made to find employee housing outside the park.*

Relocating concessioner and National Park Service employee housing, maintenance facilities, and administrative structures outside the park would not be practical in all cases. Certain support functions need to be near the park to provide for security and services. Relocating housing to an area outside the park would require the purchase or lease of land and the construction of new facilities. This would pose unique funding challenges. The funds from entrance fees and the park's operating budget are restricted to projects within the park boundary.

The concessioner must retain roughly 500 employees each year. Having employees on site to allow for split shift work and close supervision is preferable for the concessioner. Employees are attracted to working in the park because they can live and recreate here. Housing employees at locations remote from the park would complicate the task of recruiting and retaining seasonal employees. Requiring the concessioner to provide transportation for employees from a remote housing site to the work area would increase the concessioner's operating expenses and would affect the economic feasibility of the contract.

44. *The park should require concessioners to improve recycling efforts.*

This issue was addressed on page 2-1 under the Vision for Commercial Services section. We will work with the concessioners to improve recycling efforts. See the earlier response on this subject.

45. *Any new support facilities for concessioners should be located outside the park.*

Your suggestion to locate new support facilities for concessions outside the park is good. This suggestion will be considered where appropriate. For instance, some concessioners like Glacier Park, Inc. own facilities outside the park that provide support services to facilities inside the park.

46. *The park should analyze the “ecological carrying capacity” for commercial and private activities.*

The park takes impacts on natural and cultural resources into consideration with each new proposed development or activity. Carrying capacity analysis is very complex, because it must consider both sociological and economic factors. It is difficult to achieve realistic and meaningful numerical capacities. The General Management Plan began the process of determining carrying capacity by creating management zones and defined visitor experience and resource conditions. The next step is to determine indicators and standards in each zone that achieve the defined visitor experience and resource conditions. However, there has been disagreement within the science community about how to do this and the effectiveness of these indicators and standards. In the absence of numerical capacities or impact thresholds, i.e. limits of acceptable change, the National Park Service manages group sizes and approved services conservatively and at levels we feel confident would not likely result in environmental degradation. The commercial services plan does not propose “unlimited facilities, activities and visitors” as described in the comments.

47. *The park should find methods for visitors to kennel animals.*

See Appendix 1.

48. *The park should contract with horse packers to deliver supplies to the backcountry instead of using helicopters.*

We use stock whenever possible to pack supplies into the backcountry. The National Park Service attempts to use the minimum tool required to complete a task in the backcountry. In some cases, a helicopter is considered the minimum tool, such as when pack stock cannot safely reach a location, or in the example of hauling waste out of Granite Park, when using pack stock would require many more trips along the trail with associated impacts, and increased risk of employee exposure to pathogens. A helicopter was able to complete waste removal this spring in several hours, and with less impact, compared to the several days it would have taken to haul the waste out with stock. The National Park Service carefully examines every request for administrative use of helicopters. All administrative use of aircraft must comply with the park’s Aviation Management Plan. This plan seeks to minimize flights to only those that are essential to accomplish the park’s mission when other alternatives are not feasible. All flights must be approved by the park superintendent. In addition, for all flights, the National Park Service consults with the U.S. Fish and Wildlife Service regarding impacts to threatened and endangered species.

**COMMENTS RECEIVED DURING THE COMMENT PERIOD FOR THE
DRAFT COMMERCIAL SERVICES PLAN AND
DRAFT ENVIRONMENTAL IMPACT STATEMENT THAT WERE OUTSIDE THE SCOPE**

The park should offer “no campfire” loops in campgrounds for visitors who wish to avoid smoke.

Your suggestion for a “no campfire” loop in campgrounds has been forwarded to the Visitor Use Division that manages campgrounds in the park.

The park needs more access for the walking challenged, including more trails.

We will take your comment into consideration. This plan does propose that the Swiftcurrent Trail be made accessible. The park continues to work on this issue to meet visitor needs. The preferred alternatives in all areas call for improved pedestrian access.

Too much emphasis is placed on opening the Going-to-the-Sun Road as early as possible.

The road opening plan has not changed. The park traditionally has tried to open the Going-to-the-Sun Road by early June.

The National Park Service should expand campgrounds on the east side of the park.

Expanding the campgrounds in the park is beyond the scope of the commercial services plan.

The Glacier Natural History Association should remove their book sales from the area of the Logan Pass Visitor Center with views of the pass.

We will take your suggestion into consideration when the West Side Discovery Center is constructed.

The park should allow foreign contractors to bid on the Going-to-the-Sun Road rehabilitation.

Although the hiring of specific contractors is outside the scope of this plan, foreign companies may bid on federally funded construction projects, and Canadian companies are treated as U.S. companies when a contract is quite large (covered by Part 25 of the Federal Acquisition Regulations, and the North American Free Trade Agreement).

The park should implement seasonal trail closures on the Reynolds route and install a pit toilet at Haystack.

These suggestions are outside the scope of the commercial services plan because trails are not a commercial service. Seasonal trail closures are implemented as needed due to concerns about wildlife or other resource, and safety.

The park should limit extended overnight parking at Logan Pass.

This suggestion is outside the scope of the commercial services plan because Logan Pass is not considered a commercial service. This suggestion will be considered if other measures are unsuccessful.

The park should continue vista clearing and should do more to control knapweed. The park should restore vegetation in campgrounds.

These issues are outside the scope of the commercial services plan. Campground restoration has been accomplished in some areas with Fee Demonstration money. Vista clearing along the Going-to-the-Sun Road will be done as part of ongoing maintenance of the road and in accordance with a Vegetation Management Plan being conducted under the Going-to-the-Sun Road Management Plan. Weed control is an annual program that is being reevaluated in an Exotic Vegetation Management Plan that is underway. Revegetation is implemented whenever ground is disturbed.

The park should remove cabins on acquired private property.

We are currently considering removal of three cabins on acquired property. In accordance with the National Historic Preservation Act, the cabins must first be evaluated for listing in the National Register of Historic Places. If the cabins are determined to be eligible for listing, the park will comply with 36 CFR 800 and the National Environmental Policy Act.

The park should increase the quantity and quality of the shuttle service, including mandatory shuttle use during the busiest times of day.

This issue is beyond the scope of this plan, however to clarify, the park considered but rejected the idea of a mandatory shuttle in the 1999 General Management Plan. The Going-to-the-Sun Road rehabilitation project will incorporate a shuttle system as part of the mitigation. This system will be used as a model for a more permanent but optional shuttle service. The concessioner currently operates a hiker shuttle.

The park needs to implement a public transportation system. The park should charge a fee for private vehicle use on the Going-to-the-Sun Road to encourage shuttle use. Backcountry visitors should be required to obtain a permit to park private vehicles overnight.

This issue is beyond the scope of this plan. The Going-to-the-Sun Rehabilitation Plan and Environmental Impact Statement will develop a parkwide transit system to reduce congestion on the Road during the rehabilitation effort. We will take into consideration your suggestions for fees for private vehicles and parking permits for backcountry travelers.

The park should not limit the use of private vehicles across Going-to-the-Sun Road.

There are no plans to limit the use of private vehicles in the park.

The funds to maintain the Going-to-the-Sun Road should be obtained by charging an extra fee to those driving the Road. Those visitors who stay overnight should have a pass so they would not have to pay a fee each time they leave and enter the park.

Although this is not an issue related to commercial services, the Going-to-the-Sun Road Rehabilitation Plan and Environmental Impact Statement determined the cost of road repairs to be \$120-170 million. To raise this amount by charging a fee to visitors would take many years, and the condition of the Road would deteriorate significantly in that time. The funds would be needed up front. The park has requested funding from Congress to begin rehabilitation as soon as possible.

The park currently offers a seven-day or yearly pass for visitors.

The park should increase opportunities for horseback riding in the park, including having more than one commercial operator, improving access sites for stock users, and revisiting party size limits, stock numbers and recreational grazing rules.

This issue is outside the scope of this plan. Group size limits would be addressed in the Backcountry Management Plan when it is revised. The number of concessioners offering horseback trips will be determined when a prospectus is prepared. Please see response to letter #291.

No horses should be allowed in the park because of impacts to park resources.

Horseback riding is a traditional recreational use of the park that would continue under this plan. This issue was addressed in the General Management Plan. The commercial services plan does not address private stock use, but there are regulations in place to protect park resources from impacts due to private stock use.

Provide bicyclists times to ride the Going-to-the-Sun Road by implementing a one-way designation for vehicles at various times of the day.

This issue is beyond the scope of this plan. However, in the Going-to-the Sun Road Rehabilitation Environmental Impact Statement, the park stated that there would be no restrictions on private vehicle use over the Road. A one-way designation would restrict many travelers, including those traveling over the Road for business unrelated to the park. This designation was considered but rejected in the General Management Plan.

Provide a bicycle path on the non-alpine portion of the Going-to-the-Sun Road.

This issue is outside the scope of the commercial services plan. Adding a bicycle lane to the Going-to-the-Sun Road would require widening the road. The width of the Road is one of the contributing elements to its designation as a national historic landmark; therefore the road will not be widened and bicycle lanes will not be added.

The park should restrict use of private vehicles on the Going-to-the-Sun Road to allow safer opportunities for bicyclists.

This restriction was considered but rejected in the General Management Plan. During scoping for the Going-to-the-Sun Road Rehabilitation, it was determined that the park should not at any time restrict private vehicles from crossing the Road. Restrictions on group sizes for guided bicycle tours and encouraging the use of shuttles and tour buses are some of the ways in which the National Park Service is attempting to reduce congestion on the Road and ensure an enjoyable experience for all park visitors. In the spring as plowing operations progress up the Going-to-the-Sun Road, there are opportunities for hikers and bicyclists to use the road without motor vehicle traffic.

The park should add trails for mountain bicycling and off road motorcycling.

This issue is beyond the scope, however the park's backcountry is designated as proposed wilderness and in accordance with National Park Service policy for management of proposed wilderness, wheeled vehicles are prohibited.

The park should improve historical displays such as those from the Great Northern Railroad era.

This suggestion will be taken into consideration as interpretive displays are developed for the sites during the design phase.

The park should avoid adding lighting in campgrounds, and should replace current light sources with low-level lighting to reduce impacts.

We agree with your comment on lighting; it is a sensitive issue to provide for safety and security while not detracting from the natural and historic sense of place. The National Park Service is exploring options to correct the existing lighting and will assure that future projects use appropriate low-level lighting.

The National Park Service should allow ice fishing.

This issue is beyond the scope of this plan, however lake fishing is now open all year; details are provided in the park fishing regulations. Commercial fishing of any kind is prohibited in Glacier National Park.

The National Park Service should expand the trail system.

Expanding the trail system is outside the scope of this plan. Many trails have been closed over time due to environmental damage or in order to protect sensitive sites. Building more trails might help distribute use in certain areas, but there would be direct impacts on wildlife, vegetation and soils in undisturbed areas.

The Granite Park and Highline areas should be closed to the public when grizzly bears are using the areas.

When grizzly bear activity is reported along trails, the park, under the Bear Management Plan, considers closure of trails and areas as appropriate.

RESPONSES TO COMMENTS FROM OTHER FEDERAL, STATE AND LOCAL AGENCIES, INDIAN TRIBES, ORGANIZATIONS AND BUSINESSES

See the following pages.



#1

June 3, 2003

Michael O. Hohn
Superintendent, Glacier National Park
West Glacier, Montana 59936

Dear Mr. Hohn:

Thank you for the opportunity to comment on the Draft Commercial Plan and Draft Environmental Impact Statement for Glacier National Park dated May 2003. In reviewing the sections regarding air quality, I have the following suggestions for revising the text:

1

Page 3-55: "Flathead county, which includes the part of the park west of the Continental Divide, is currently out of compliance with Montana standards for particulate emissions. Montana is required to develop a state implementation plan to attain the standard for particulates. Requirements for particulates matter having an aerodynamic diameter of 10 µg or less (PM-10). Flathead county implements measures contained in a PM-10 control plan to ensure ambient concentrations of PM-10 do not exceed the National Ambient Air Quality Standards."

If you have any questions regarding this suggestion or require further information, please call me at 406-444-7916.

Sincerely,

 Debra Wells
 Air Quality Specialist



1. The text has been revised. Thank you for your comments.



"Scott Silver"
ssilver@wildwilderness.org

To: "glac_public_comments@nps.gov"
Cc: Subject: Glacier Draft Commercial Services Plan COMMENTS

07/14/2023 06:29 PM
MGT

Dear Glacier NP Comment Recorder -

Wild Wilderness is a 13 year old recreation / conservation organization with supporters in all 50 states. We focus primarily upon the issue of Wilderness management and strive to ensure that designated wilderness is managed as wild Wilderness in accordance with the Wilderness Act and all associated laws and regulations. As a second focus, we strive to halt the juggernaut that should rightly be called - "The Corporate Takeover of Nature and the Disneyfication of the Wild". When it comes to the NPS, oft-times our task seems near enough impossible. I submit the following comments as the Executive Director of Wild Wilderness and do so in the context of our second focus area.

First off, it is our hope that NPS's Glacier Park Action Alert Dated July 18, 2023 (appended) is not the only such Action Alert circulating. It is far too weak and is used here only as a point of reference.

I would start by disagreeing with NPSA on at least the first half of point #4 below. I see no need or justification for commercial bike tours and support elimination of such commercial tours from within Glacier NP.

How, I ask, do these tours currently operate??? Does the tour operator shuttle customers to a staging area near the pass and let them coast to their parked car or does the operator they let people ride unguided from one end of the park to the other and provide nothing more than a return shuttle? I'd have a major problem with the former because what I've described is non-motorized wreckeretainment and nothing more. It would be akin to renting Segways, something inappropriate within any National Park. I would likely support a straight-forward bicycle shuttle service. The devil would, of course, be in the details.

I am extremely surprised (shocked actually) that the NPSA Alert makes no mention of the proposed commercial scuba program. There's no NEED for such a venture nor can it possibly be justified. This proposed activity is commercial opportunism at its worst. Commercial scuba should under no circumstances be permitted.

I must also question the first part of #2, below. Are commercial guided hikes really required??? I don't see why the park needs to be cluttered with flocks of tourists being led by private guides. It is far better to let park rangers do all of the nature interpretation that takes place within the park.

If the NPS does not wish to provide all conceivable interpretative experiences, then let your visitors discover the park on their own. Equally important --- let visitors who do not wish to avail themselves of these tours have the opportunity to experience their park WITHOUT having to rub shoulders with these traveling flocks.

And finally, I can not see how NPSA justifies supporting commercial bike and hiker tours while opposing commercial motorcycle tours. Wild Wilderness agrees with NPSA that these motorcycle tours are inappropriate and should

Comment #140 (Wild Wilderness)

1. The current commercial authorizations do not allow what you describe; bicycle tour operators may have a support vehicle to assist riders along the route, but cyclists are not driven to Logan Pass, for example, to coast down. These tours usually originate on the west or east side of the Going-to-the-Sun Road and bicyclists ride across the road. Permits are issued accordingly. Permits have also been issued for other locations in the park including Many Glacier and Two Medicine.

The public transit system that will be implemented during the rehabilitation of the Going-to-the-Sun Road will include a system for private bicycles to be carried by the shuttle vehicle.

1

Comment

Response

not be permitted. We, however, suggest that all COMMERCIAL activities (including non-motorized ones) should also be kept to the barest minimum.

The Glacier Commercial Services Plan is, to be blunt, an obscenity. As with so much the NPS does these days, this draft plan is an exercise in "commercialization, privatization and motorization" which seeks little more than to promote industrial tourism and generate opportunities for private profit by its concessionaire-partners!!

As part of Wild Wilderness' official comment I wish to include the following quotes by Ed Abbey and John Muir and submit them as if these persons were alive to speak these words to you today. If you can not accept these comments as the words of Abbey and Muir, then please accept them as the comments of Wild Wilderness instead.

"Now here comes another clown with a scheme for the utopian national park: Central Park National Park, Disneyland National Park. Look here he says ... better yet do away with the campgrounds altogether, they only cause delay and congestion and administrative problems --- these people want to see America, they are not going to see it sitting around a goddamned campfire; take their money, give them a show, send them on their way -- that's the way to run a business"
- Ed Abbey, Desert Solitaire

In these ravaging money-mad days...San Francisco capitalists are now doing their best to destroy Yosemite Park...often thinly disguised in smiling philanthropy...These temple destroyers, devotees of ravaging commercialism seem to have perfect contempt for nature, and, instead of lifting their eyes to the God of the mountains, lift them to the almighty dollar.
-- John Muir, 1909

Thank you for considering these comments and entering them into the official record.

Scott Silver, Executive Director
Wild Wilderness
248 NW Wilmington Ave.
Bend, OR 97701

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e-mail: ssilver@wildwilderness.org
Internet: http://www.wildwilderness.org



"North Fork Hostel"
 <nfhostel@nfhhostel.co
 nfh
 07/15/2003 09:16 AM
 CST

To: <glac_public_comments@nps.gov>
 cc:
 Subject: Commercial Services Plan

141

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

I support the Glacier's preferred alternative for future management of Granite Park Chalet. The chalet would continue to be operated as a hiker shelter with restroom, water and cooking facilities. This alternative is less expensive for both taxpayers and chalet users than an alternative proposal to establish full-service dining and lodging. This full-service alternative, which would require on-site housing for eight employees, also would increase demands on water, sewage, gray-water disposal systems. The hiker shelter system has been operated very successfully in recent years by Glacier Wilderness Guides, and it has proved popular with guests with minimal environmental impacts in a sensitive alpine environment.

I support the park's proposal to allow for guided day hiking for cultural and natural history interpretive purposes. However, it should be stated that this is not an acceptable substitute for guided hikes by Glacier interpreters, which should be increased instead of diminished. NPSA also supports the proposal to establish limits on group hikes, although these group limits should be applied to hikes led by the Park Service as well as commercial guides. Forty people in a hiking group is simply too many for a variety of reasons.

1

I oppose the park's proposal to permit commercially guided motorcycle tours. The number of private motorcycle trips through the park has grown in recent years, and many of these motorcycles are inappropriately loud. Increasing motorcycle use by allowing commercially guided tours is not an appropriate commercial use of the park.

2

I oppose the park's proposal to restrict commercial bicycle tours. Glacier's Going-to-the-Sun Road is one of the finest places in America to ride a bicycle, and this opportunity already is unfortunately restricted due to very real safety concerns on the congested Sun Road. Instead of restricting bicycle use, Glacier should focus on developing a multi-modal transportation plan that provides for safe and convenient transportation options by car, shuttle bus or bicycle.

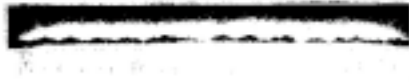
3

Oliver Weister
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Comment #141 (North Fork Hostel)

1. This plan addresses only commercial services. Determinations of group size for the general public and for National Park Service naturalist-led hikes will be addressed in the Backcountry Management Plan when it is revised. The number of National Park Service-led hikes is a factor of operating budgets, but we will consider your suggestion when we look at the 2004 summer season.
2. See response # 30 in Grouped Responses to Individual Comments.
3. During the rehabilitation of Going-to-the-Sun Road, an expanded transportation system will be in place (dependent on funding). A more permanent system will be developed after the rehabilitation is complete. The permanent system will be based on the successful aspects of the temporary system. Any transportation system will provide for bicycle transport.

#174



July 19
August 9, 2003



Dear Superintendent Holm:

We submit this letter as the official comment of the Montana Wilderness Association regarding the Draft Commercial Services Plan and Draft Environmental Impact Statement. Please include this letter in the official record.

The Montana Wilderness Association and its members promote the protection and preservation of Montana's public wildlands and the naturally functioning ecosystems found there. The Association recognizes the complexity of the commercial services plan as well as the significant public use of commercial services. It is often difficult to safeguard the park's natural and cultural resources while simultaneously accommodating the public. We see the CSP as a good effort to do both.

Therefore, the Montana Wilderness Association wishes to affirm that commercial services should always be second to the protection and preservation of natural and cultural resources, in accordance with the NPS organic act, such that the natural and cultural resources of the park endure for generations to come. Additionally, the Association believes it is far better to provide a quality experience rather than build and accommodate for a high quantity of visitors.

A particular issue that caught our eye was future management of Granite Park Chalet. We commend and agree with GNP management's preferred alternative that breaks with the decision in 1993 to manage Granite Park Chalet as a full service facility. We support the draft decision to maintain the Chalet as a hiker's shelter.

Currently, Granite Park Chalet's operation as a backcountry hut minimizes impacts. The Chalet's operation (by Glacier Wilderness Guides) consistently uses and discharges less water than permitted. Food and garbage are well managed and the visiting public has the opportunity to learn first-hand how to 'leave no trace'. GWG's applies the same dishwashing and food management techniques that have contributed to its long success as Glacier's sole backcountry guiding service. Because of the success of this program, the Montana Wilderness Association doubts the need to improve the water delivery

1

Comment #174 (Montana Wilderness Association)

Thank you for your comments.

1. We do not feel that supplying potable water will lead to dramatic increases in water usage at the chalet or gray water discharge. Nonpotable water and bottled water is currently available at the chalet and in the nearby creeks, and we are able to meet the required usage guidelines for discharge. We feel that encouraging hydration by chalet visitors and day users helps prevent hypothermia and dehydration, and will lessen the dependence on bottled water that has to be packed in. We also feel that making potable water available at the chalet will limit the environmental effects of people using nearby creeks to fill water bottles.

1

system. Such improvements, if not strictly limited, would likely lead to dramatic increases in water usage at the Chalet as well as gray water discharge. We expect that the cost of providing potable water will be excessive.

In our experience visiting the Chalet, it is quite something to watch the overnight guest filing down the trail a quarter mile to retrieve water. Visitors learn an important truth about the value of a commodity so often taken for granted. On the other hand, walk-through visitors are advised to carry their own water and are not usually provided water at the Chalet. The cost of this "self-sufficiency" is dramatically less than for providing a spigot at the chalet, and something the public has accepted as the norm for years now.

Finally, construction at the Chalet should always be kept to the minimum to preserve backcountry and wilderness integrity and experience. Extensive water works would diminish this experience for most of one season, we speculate. We would ask the Park Administration to always err on the side of preserving the visitor experience. In the case of Granite Park Chalet, that experience is wilderness, not convenience.

On the matter of human waste, the Association recognizes the need for a long-term solution. We support the proposed intent to replace existing restrooms. However, we are skeptical of the need to increase the number of toilets, unless this increase would lead to fewer flights to remove waste, or other operational efficiencies. We are aware of the considerable cost in providing this kind of public service, and trust that the Park's decision will be based on need. The problems associated with the Sperry Chalet toilets (cost and functionality) should be avoided.

Thank you for the opportunity to comment. We may submit other comments on the CSP, as we continue to review its contents.

Respectfully submitted,



Dave Hadden
 Montana Wilderness Association
 755-6304/837-0783/paddler@digisys.net



MONTANA HISTORICAL SOCIETY

225 North Roberts • P.O. Box 201201 • Helena, MT 59620-1201
• (406) 444-2694 • FAX (406) 444-2696 • www.montanahistory.org •

#184

July 15, 2003

Michael O. Holm
Superintendent
National Park Service
Glacier National Park
West Glacier, MT 59936

Ref: Commercial Services Plan Draft EIS

Dear Mr. Holm:

I reviewed the Draft EIS you sent to us regarding your proposed work on the commercial services buildings at Glacier. After reviewing your preferred alternatives to the work, I see nothing that causes great concern for us, but look forward to reviewing these projects in greater detail as you develop them.

Thank you for consulting with us.

Sincerely,

Pete Brown
Historic Architecture Specialist

File: NPS/Glacier/2003053001



STATE HISTORIC PRESERVATION OFFICE • 1418 8th Ave • P.O. Box 201202 • Helena, MT 59620-1202
• (406) 444-7715 • FAX (406) 444-0375

Comment #184 (Montana State Preservation Office)

1. Thank you for your comment. At this point in the planning process, the required documentation is not available to conduct section 106 compliance. When that documentation, as defined by 36 CFR 800, becomes available, we will conduct Section 106 compliance.



Keith Hammer
khamer@swanview.org
07/23/2003 08:50 AM
CST

To: glac_public_comments@nps.gov
cc:
Subject: Granite Park Chalet

220

Dear Folks at Glacier:

Please keep Granite Park Chalet managed as a hiker shelter as it has been in recent years.

Please do not change its management to a more plush, full-service facility.

The way the Chalet is managed now fits nicely into the full spectrum of facilities offered in Glacier.

Sincerely,

Keith J. Hammer
Chair - Swan View Coalition

--

Keith Hammer
Swan View Coalition
3165 Foothill Road
Kallispell, MT 59901
406-755-1379 (gh/foak)
khamer@swanview.org
http://www.swanview.org

"People Helping People Help the Earth."

ORIGINAL

Comment #220 (Swan View Coalition)

Thank you for your comments.



"Neal Wodum"
<nwodum@montana.gov>
07/30/2003 02:19 PM
CST

To: <glac_public_comments@nps.gov>
Cc:
Subject: Granite Park Chalet alternative proposal

273

<?xml:namespace prefix = st1 ns = "urn:schemas-microsoft-com:office:smarttags" />July 30, 2003
<?xml:namespace prefix = o ns = "urn:schemas-microsoft-com:office:office" />
Superintendent Mick Holm
Glacier National Park
West Glacier, MT 59936

RE: Draft Commercial Services Plan for Glacier National Park
Granite Park Chalet, Alternative C

Dear Superintendent Holm:

In response to the request for public comment regarding the Draft Commercial Services Plan for Glacier National Park, we submit the enclosed alternative interim proposal for full service operation of Granite Park Chalet until all the necessary requirements are fully implemented for Alternative C.

Thank you for your consideration.

Sincerely,

Terry Abell

Neal and Pam Wodum

Kathleen Larson Phillips

Terry Abell
PO Box 68
Whitefish, MT 59937
862-3531

Neal and Pam Wodum
PO Box 1036
Choteau, MT 59922
466-2548

Kathleen Larson Phillips
822 West Watson
Lewistown, MT 59457
538-8770


granite proposal.doc



Comment #273 (former Save the Chalet Foundation)

Thank you for your comments and work preparing another alternative for our consideration. We have reviewed and considered your proposal as well as consulted with the Public Health Service. Given the staffing level that would be required for operation, hygiene requirements and other aspects of the proposal, it does not appear to reduce the projected gray water production sufficiently to fall within the existing 100-gallon capacity of the current system. Without modifications to the gray water system as outlined in alternative C, full services would not be feasible. Please see "Alternatives Considered But Rejected" in the *Final Commercial Services Plan and Final Environmental Impact Statement*. Many of the actions proposed in your alternative are already included in the existing operations, such as limiting water use and waste discharge and collaborative use of helicopter flights.

In Response To A Service That Is Necessary, Full Service At Granite Park Chalet, Alternative C, Provides The Following:

- a) visitor understanding and appreciation of park purpose and significance
- b) enhancement of visitor experiences consistent with the park area philosophies
- c) assists the park in managing visitor use and educating park visitors
- d) is an essential service and facility not available anywhere outside Glacier National Park

In Response To A Service That Is Appropriate, Full Service At Granite Park Chalet, Alternative C:

- a) is consistent with the purpose and significance of GNP
- b) is consistent with laws, regulations and policies applicable to Waterton Glacier International Peace Park and the National Park Service
- c) does enhance public health and safety
- d) does not significantly impact or impair park resources or values
- e) lies within parameters established for other park uses and activities
- f) includes the general public in participation in limited recreational opportunities

Therefore, we submit the following proposal with the intention of meeting the needs of the draft commercial services plan and draft environmental impact statement, in favor of Alternative D, for full service at Granite Park Chalet.

An Interim Proposal

Combining 80 Years of Appropriate & Quality Traditional Full Service

And

21st Century Technology Methodologies

Full Service American Plan

(Alternative C)

Including the General Public (250-300 day hikers)

A Unique and Unparalleled Back Country Experience

GRANITE PARK CHALET
A NATIONAL HISTORIC LANDMARK

Experience the Wilderness of Glacier National Park

Explore the Trails, Geology, Flora and Fauna

Teach the Cultural History of the Chalets

Through staff orientation and visitor contact, increase public awareness of the park service's charge to serve and protect.

GRANITE PARK CHALET

(Full Service American Plan)

- I. Cultural, historical and traditional service at Granite Park Chalet (GPC)
 - A. Provide overnight guests with American Plan Service.
 - B. Recreate a historical and cultural experience for all overnight guests.
 - C. Continue the living oral cultural history of GNP and its origin, including all chalets and hostels within GNP.

- II. Continue traditional quality back country style service to the general public
 - A. Continue the excellence tradition of daily ala carte for the public.
 - B. Provide information, advice, first aid, food, and guidance to 250-300 day hikers.
 - C. Provision of potable water (NPS) and food (concessionaire).
 - D. Engage guests in dialogue regarding modern environmental ways all people can preserve and protect GNP.
 - E. Staff will be available upon need for all back country emergencies. All staff will be trained in first aid, CPR, and encouraged to gain certified first responder A status.
 - F. Staff will be willing to assist NPS whenever and however needed.

- III. Cooperative partnership with Glacier National Park (GNP)
 - A. GNP/Concessionaire cooperation and flexibility to meet NPS Guidelines and concessionaire needs.
 - B. Concessionaire will seek to provide the highest environmental standards, while providing cultural, historic full services to the public.
 - C. Periodic meetings, at least annually, to ensure good cooperation, understanding, and awareness of NPS and

concessionaire changes and procedures which effect the operations.

IV. Environmental Objectives*

- A. Restrict potable water to the public in order to reduce grey water volume (spigot only).
- B. Utilize 21st Century wilderness practices wherever prudent to do so.
 - 1. Sanitizing Soap Cleansers (No water; no pipes) in personal hygiene areas.
 - 2. Meter both input as well as output of water.
 - 3. Encourage pack in, pack out procedures.
 - 4. Teach, through role modeling, conversation, and educational resources the importance of GNP's wilderness.
- C. Restrict kitchen grey water and guest usage to the least amount possible.
- D. Employ new techniques as applicable to full service operation whenever conducive to environment.

***Concessionaire Environmental Methodologies**

- 1. Linen brought in by horse/sherpa.
- 2. Daily controlled usage of potable water on premises.
- 3. Paper products for meals and ala carte service (flatware only when necessary).
- 4. Allow concessionaire flexibility in opening/closing dates.

Interim Environmental Guidelines

- 1. Concessionaire will seek to control waste disposal, simplify food preparation, cooking, and baking methods.
- 2. Concessionaire will seek to minimize the number of supply trips into GPC.
- 3. Integrate freight and helicopter trips, only when NPS is already utilizing a helicopter for back country needs. Concessionaire would pay one half of flying time, reduce number of pack trains,

Comment

Response

- and be available regardless of seasonal operation to implement the exchange of heavy and bulky items such as wood, linen and paper products.
4. NPS will complete the treatment system for potable water (for the general public as well as overnight guests) usage during the interim period (chlorination, etc.).

(#284-285) 1

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5 GLACIER NATIONAL PARK
6
7 COMMERCIAL SERVICES
8 PLAN/DRAFT ENVIRONMENTAL IMPACT STATEMENT
9
10
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13 OPEN HOUSE and PUBLIC HEARING
14
15 ORIGINAL
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21
22 THURSDAY, JUNE 26, 2003
23 BLACKFEET COMMUNITY COLLEGE
24 BROWNING, MONTANA
25 5:00 P.M. - 8:00 P.M.

GOODMAN REPORTING - (406)863-4828
P.O. Box 1182 Whitefish, MT 59937

Comment #284-285 (Trumand Hall)

1 Thursday, June 26, 2003

2

3 (From 5:00 p.m. to 7:00 p.m. an Open House was

4 conducted, during which time the public was able to ask

5 questions, offer comments verbally and/or in writing to

6 park staff, or have their comments recorded by a court

7 reporter. No comments were offered.)

8

9 MR. FRYE: This portion of the Open House

10 is an opportunity for you all, if you wish, to make

11 comments, public comments that are recorded and become

12 part of the record, as do written comments as well.

13 We have an hour set aside for this part of the

14 session. There really are a very few people who have

15 indicated an interest in making a comment, publicly.

16 But we certainly will entertain those who have indicated

17 on this sign-in sheet that they'd be interested in doing

18 that.

19 Right now, we have Trumand Hall indicated an

20 interest and then, really, that's it. But I don't want

21 any of you to feel that you can't take the opportunity

22 to get up and say what you'd like to say. #284

23 MR. HALL: Good evening, ladies and

24 gentlemen. My name is Trumand Hall. Everybody knows me

25 by Mouse, all over the world, because of my outfit.

Comment

3

1 I was over to see this beautiful young lady
2 over at the reservation the other day, Jan Knox, and I
3 unloaded my bag of tricks on her the other day. Because
4 as I go through the book here, what's going to happen to
5 the horseback riding in Glacier National Park?

6 If you all read your book here, it says you're
7 probably planning on trucking horses from different
8 areas in the Park to the Two Medicine area, which I
9 think is very uncalled for, and I think it's very
10 dangerous. A good example would be like our Browning
11 basketball team used to be hauled over the mountains in
12 that league, and we had to kill nine children in the

13 mountains before we stopped that. And I think by
14 trucking horses and people back and forth up and down
15 those roads, it isn't a matter of when, it's how many.

1

16 It's going to happen. So I think it's uncalled for when
17 the trailheads are right there behind the GPI's lodge on
18 somewhat their property. And I also control all the
19 land, the tribal land, up to the Park line. So I got
20 full control of the land behind the lodge that these
21 trailheads are on.

22 I believe that Glacier National Park is the
23 most beautiful place in the world. I could go to my
24 tribal council and have them try to back me because I am
25 a tribal member. But I am also a good outfitter. And I

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P.O. Box 1182 Whitefish, MT 59937

Response

1. See the description of the alternative in Chapter 2, Horseback Riding and Horse Packing Services.

Horses would not have to be trucked to the Two Medicine area from other areas of the park.

Comment

Response

4

1 would like to make my comments on this. I am an
 2 outfitter and I think I'm first class. You can come
 3 check me out. I'll give anybody a ride to any
 4 destination I know just to see what I do.

5 So what I'd like to open up here is this. Is
 6 the trailheads are on our property, whether it's -- it
 7 ain't my property, it's GPI's property. But if my
 8 contract is up, some other person takes it. There is no
 9 sense in packing human beings and animals up and down
 10 these roads for another twenty years. Someone's going
 11 to lose a life when everything is right there and can be
 12 utilized from GPI.

2

13 Another comment that I'd like to make is the
 14 lady that used to operate the boat up at Two Medicine
 15 Lake, she told me there were 10,000 people rode that
 16 boat and just about every one of them would ride a
 17 saddle horse from Upper Two Medicine back to the lodge
 18 at East Glacier on the Mount Henry trail. But they are
 19 scared of grizzly bears. So I guess these are the
 20 comments I'd like to say.

21 The service is badly needed, whether
 22 it's -- I'm not looking at this as a Blackfoot Indian,
 23 I'm looking at this as an outfitter. And I think it is
 24 badly needed in the area. I don't know; they tell me,
 25 what, two million people go through Glacier National

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2. The Mount Henry trail is now included in the revised preferred alternative.

1 Park. And I think by putting this all together and not
 2 trucking animals and utilizing GPI's trailheads along
 3 with the Mount Henry trail and a few other trails that
 4 could be used, there is only good established business
 5 that will go a lot further in the next twenty years.
 6 And by utilizing me as a tribal member, I also own and
 7 operate a big cattle ranch in -- the town of East
 8 Glacier is in the middle of my ranch. I take rides down
 9 to Two Medicine drainage. I take rides to the top of
 10 Looking Glass which has been compared to Switzerland.
 11 So we -- as a tribal member, I have something to offer
 12 Glacier National Park and I hope, in return, Glacier
 13 National Park has something to offer me. Thank you.

14 MR. FRYE: Thank you, Mr. Hall.

15 (Applause.)

16 MR. FRYE: Is there anyone else who would
17 like to -- Dan, would you like to make a comment or not?

18 MR. HAYS: No.

19 MR. FRYE: Anyone else?

20 And your name?

21 MR. DES ROSIER: Fred Des Rosier.

22 MR. FRYE: Okay; Fred. Do you want to come
23 up?

24 MR. DES ROSIER: Not really. There's some
25 background noise that kills the hearing aids. If you've

#285

Comment

Response

1 got a hearing aid, it's hard, you can't hear.

2 So I might be way off base; I don't know. But
3 I think we should expand the camping on east side of the
4 Park. The old St. Mary's campground at the foot of the
5 upper lake, you're going to expand the cabin camps or
6 redevelop the cabin camp at Many Glacier. And I think
7 we should expand the campground at Two Medicine at the
8 trailhead for Scenic Point. That's been a disturbed
9 area for years and years. It wouldn't have any adverse
10 effect on the environment to expand that campground a
11 little bit.

12 I think we should maintain the historic service
13 at Granite Park so that's a full facility; meals and
14 lodging. And I think we should expand the trail system.
15 When I was a boy, there was 1500 miles of trails in
16 Glacier Park, and now there's half that much. And I
17 think some of those old trails should be opened and
18 expanded and used.

19 And I think that we should allow ice fishing on
20 the lakes on the east side of Glacier Park. If you have
21 the stamina to ski into Slide Lake or Red Eagle, you
22 should be able to bring home a fish. In the years past,
23 they always said Well, we don't have the staff. The
24 Park isn't there for the staff. The Park is there for
25 the enjoyment of the people. And that's my comments;

GOODMAN REPORTING - (406)863-4828
P.O. Box 1182 Whitefish, MT 59937

Comment

Response

1 thank you.
2 (Applause.)
3 MR. FRYE: Would anyone else like to follow
4 Fred to the stage?
5 (No response.)
6 MR. FRYE: Okay; just a couple of quick
7 things. As I mentioned at the beginning, you do have
8 the opportunity to submit written comments through the
9 30th of July, which will be entered into the record as
10 well. And I would encourage you, certainly, to do that,
11 if you have comments, that you either didn't want to
12 mention this evening or that come to mind as you think
13 about the plan. And once again, thank you very much for
14 coming this evening; we appreciate it. Thanks.
15 (Hearing in recess until the close of the
16 evening at 8:00 p.m.)
17
18
19
20
21
22
23
24 --o0o--
25

GOODMAN REPORTING - (406)863-4828
P.O. Box 1182 Whitefish, MT 59937

Comment

Response



"John Frederick"
<johnd@nfhstela.com>
07/30/2003 02:52 PM
CST

To: <glac_public_comments@nps.gov>
Cc:
Subject: Draft Commercial Services Plan

287

Comment #287 (North Fork Hostel, Square Peg Ranch)

Thank you for your comments.

North Fork Hostel and Square Peg Ranch
80 Beaver Drive
Folebridge, MT 59928-9778

29 July 2003

Superintendent Mick Holm
Attr: DCap/DEIS
Glacier National Park
West Glacier, MT 59936

Dear Superintendent Holm:

I would like to make some comments on the Draft Commercial Services Plan.

Bicycle tours are fine, but motorcycle tours are too noisy. At least bicycles are quiet.

Comment

Response

Commercially-led hikes hikes for natural history and cultural education purposes are fine provided that the numbers of hikers are not very large. A large bus unloading at a trailhead and a mob of people going down a trail are equally unattractive.

I have a hostel in Pollockbridge because it gives people a chance to stay somewhere cheaply.

Granite Park Chalet is certainly more expensive, but it allows individuals to stay at Granite Park Chalet who could not afford to stay at Sperry Chalet. I endorse the concept of Granite Park Chalet being used as a hiker shelter similar fashion to that of a hostel.

I apologize for being slow to send this to you, but the Wedge Canyon Fire complicates everything including receiving or sending mail. In fact, I could not get connected to the internet connection this afternoon and will send this at the first opportunity.

Thank you.

Sincerely,

John Frederick



"Carol T. Place"
 <carolplace@montana.net>
 07/06/2003 10:06 PM
 CST

To: <gao_public_comments@nps.gov>
 cc: <carolplace@montana.net>
 Subject: Comments - DCSPI/DEIS

291

Thank you for mailing the Draft Commercial Services Plan and Draft Environment Impact Statement (DCSP/DEIS) for Glacier National Park (GNP), Montana for review and comment. The "book" definitely portrays a considerable amount of time and effort spent towards trying to keep or enhance GNP (our "Crown Jewel") for all visitors to enjoy.

Tour de Great Falls is a guided tour business located in Ulm and Great Falls, Montana that was granted operating authority by the Montana Public Service Commission in 1995 to provide transportation service for tours in Montana. As the business owner of Tour de Great Falls (TdGF), currently operating with 22-passenger and 13-passenger large picture-window tour buses, the following comments are respectfully submitted for consideration and implementation:

Request #1: Presently TdGF is prohibited from providing tourists with the Going-to-the-Sun Road (GtSR) interpretive tour experience in our vehicles. It is requested that TdGF be granted approval for unlimited access to provide our customers with this wonderful GtSR interpretive tour experience on our vehicles. If unlimited access is not granted, then the request would be for at least 30 GtSR access permits to be granted per season.

Reasons: We have people from all walks of life, including those with disabilities, foreign visitors, senior citizens, non-drivers or people without transportation, drivers afraid to drive mountainous roads, etc. who are visiting the Great Falls area with a limited amount of time. They desire our one-day tour to GNP, including the GtSR, but are unable to take the tour since we do not have the minimum number of passengers required by the current concessionor (Sun Tours) for a departure from Browning later than the scheduled 8:30 a.m. timeframe. In the past, we have left Great Falls at 5:00 a.m. with under six customers and linked up with Sun Tours for their superb tour over the GtSR. However, not all people are able to participate at such an early departure time, especially with an approximate 8 p.m. return to Great Falls, thus they are deprived of access to their beautiful GNP. Those people would benefit from the additional flexibility and convenience of our interpretive tour service over the GtSR, along with other general public tourists desirous of receiving more information on a guided tour.

With TdGF transporting customers over GNP's GtSR, this would have a positive effect for the people to not only receive an enjoyable educational interpretive experience with safer and easier sightseeing which they may not otherwise have, but it may also be a positive impact in other areas. It would result in fewer vehicles producing wear and tear on the roadway, exhaust emissions/pollution, energy/fuel consumption, sound pollution, vegetation damage, soil erosion,



Comment #291 (Tour de Great Falls)

1. Federal regulations prohibit businesses from operating in park areas except in accordance with the provisions of a contract or permit. The only commercial operators currently authorized to conduct motor vehicle tours on the Going-to-the-Sun Road from Lake McDonald to Rising Sun are Glacier Park, Inc. and Sun Tours. Non-scheduled, infrequent commercial motor vehicle tours are allowed to enter the park from the west and travel as far as Lake McDonald Lodge, and from the east as far as Rising Sun Motor Inn, without written authorizations. When contracts for transportation concessions within the park are rewritten, the National Park Service will consider increasing opportunities for other companies, but the details of the contracts are outside the scope of this plan.

When determining the appropriate number and type of authorizations issued for conducting a particular necessary and appropriate commercial service in the park, the National Park Service must consider many aspects: Will it be necessary to require that the commercial operator provide this service on a regular basis so that it is available daily, weekly, etc. to the visiting public? If we want a business to provide the services in the park every day, then we must consider the financial viability of the business to assure that it can remain in operation and be available to provide those services. Is the opportunity still feasible if one, two, three or more operators are handling the demand, or have we created an environment where none of them are viable? Are there other factors that will affect the financial viability of the business?

There are currently two types of authorizations that can be used to allow commercial operators in the park.

Concessions contracts are used when a commercial operator will be required to provide a service. The National Park Service will

Comment

Response

wildlife disturbance, and multiple vehicles taking up valuable parking spaces in parking lots/pullouts/road shoulders, etc. that are already overcrowded. There would additionally be a positive benefit to the GNP, local communities, and Great Falls economies as tourists would stay an extra overnight/day or more.

2 **Request #2.** In the past, TdGF has been assessed a commercial vehicle entry fee of \$100, good for seven days. It is requested that instead of the flat \$100, this entry fee be graduated according to the number of customers and days. An example would be \$10 for the vehicle and \$5 per person aboard the vehicle, up to a maximum entry fee of \$100.

Reason: In the event of TdGF providing a tour for one-to-ten people to the GNP GtNSR, the variable entry fee cited would make it more affordable for both the tourists and TdGF.

3 **Request #3.** Since TdGF also provides Step-on Guide service, it is requested that approval be granted for our business to conduct Step-on Guide service both in commercial vehicles and in our customer's private vehicles throughout GNP where commercial transportation is allowed.

Reason: This would benefit the tourists by giving them a better national park experience with them receiving a more informative sightseeing excursion.

TdGF's request for Guided Interpretive Motor Vehicle Tours and Step-on Guide Services throughout GNP, where commercial transportation is allowed, meets the "Necessary and Appropriate" criteria as outlined in the DCSP/DEIS.

Please visit our website www.GreatFallsHistoricTrolley for additional information regarding our TdGF Guided Tours and Step-on Guide operations. We also operate the trolley "Historic" tours daily (June-September) and provide shuttle service in the fascinating community of Great Falls, Montana.

Thank you for the opportunity to submit the above comments/requests. Since today (July 30, 2003) is the last day for submitting comments on the DCSP/DEIS, a copy of this email is also being forwarded by U.S. Postal Service to Superintendent, Glacier National Park, West Glacier, MT 59936.

Respectfully submitted (with prayers for rain on those forest fires),

Carol T. Place
Tour de Great Falls
P. O. Box 27
108 Old Ulm-Cascade Road
Ulm, MT 59485-0027
Phone: 406-771-1100

determine specific conditions and perimeters for the service, determine the number of contracts that will be issued for the

service, and award the contract(s) through a competitive selection process. Contract requirements are typically more stringent and investments may be required. Facilities in the park may or may not be assigned. Since the concessioner will be required to provide the service, it is incumbent on the National Park Service to assure that there is a reasonable opportunity for the operator to realize a profit.

Commercial Use Authorizations (CUAs) will be used when the service will be authorized, but not required. The number of CUAs is typically not limited because they are not issued through a competitive evaluation process. A CUA is issued to any qualified operator who is willing to agree to its terms and conditions. Unlike a contract, there is no assurance of an opportunity to realize a profit and typically no facilities are provided in the park. Because it is the operator's discretion to provide the service or not, services may not always be available to the visiting public in the park.

To assure that we have reliable tour and transportation services in the park, it is unlikely that these services would be authorized under a Commercial Use Authorization. The number of authorizations that are appropriate for any given service must be determined at the time the authorization is issued. For those reasons, it is inappropriate to specify the number of contracts that will be issued for a service in a 20-year planning document such as the commercial services plan. However, your comments will be considered when we consider the future of tour services in Glacier National Park.

- 2. This is beyond the scope of the commercial services plan. The park does not set fees for bus tours. These fees are set nationally by the National Park Service in consultation with the travel

Comment

Response


industry. They are consistent across the country, and are reviewed annually. This method for determination of fees is equitable.

3. The step-on guide service proposed in the commercial services plan would be operated by a concessioner who would be selected through a contract bidding process.


Comment

Response

326 E. Second Street
Whitefish, Montana 59937



#S10
(406) 862-6446
Fax 862-0056
www.glaciercyclery.com



July 23, 2005

Superintendent Mick Hohn
Glacier National Park
West Glacier, MT 59936

Dear Superintendent Hohn,

I would like to respond to the Draft Commercial Services Plan and Environmental Impact Statement as it addresses bicycling activities in Glacier National Park.


The input I have is based on 22 years serving local bicyclists and bicycle tourists in the Flathead Valley through our shop Glacier Cyclery in Whitefish and serving on the Board of Directors of Adventure Cycling, the bicycle touring association based in Minnoca.

I am in support of Alternative A: Status quo/vis action, which continues to allow bicycles on paved roads in the visitor service zone of all management areas in the park. It would also continue to allow bicycles access to the 1913 Ranger Station, Apper Lookout and Caribou rustic zones. There would be no restrictions or limitations on cycling group size or number allowed across the Going-To-The-Sun Road. The time restrictions currently placed on cyclists riding on the west side of the Going-To-The-Sun Road adequately serve to reduce potential conflicts between motorists and bicycles.

1 I am opposed to the preferred Alternative B because there is no documented supporting evidence of automobile/bicycle conflict in the Plan. The rest of the Alternatives have baseline conditions that currently exist from which to postulate the future impacts. There is no substantial way to quantify the "potential" for future conflict particularly without knowing what, if any, real conflict exists now.

Another reason I am opposed to Alternative B is because developing, implementing and enforcing the proposed allocation system per Section 2-79 would "increase NPS administrative costs and staffing needs." Staff and budget allocations could be far better utilized on other projects or visitor services.

Limiting the size and number of groups using the Going-To-The-Sun road will not resolve the real issue of the Going-To-The-Sun Road which is not too many bicycles, but rather too many and too large of automobiles. The Going-To-The-Sun road wasn't originally designed to accommodate the size, width, weight, and number of automobiles that squeeze themselves over Logan Pass each year. In most



We sell more than just bikes . . . we sell a good time!

Comment #310 (Glacier Cyclery)

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

Comment

Response

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

Thank you .

Sincerely,

Joe Brunk



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY #313
REGION 8, MONTANA OFFICE
FEDERAL BUILDING, 10 West 15th Street, Suite 3200
HELENA, MONTANA 59620



Ref: 8MO

July 23, 2003

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

Re: Draft Commercial Services Plan and Draft
EIS

Dear Mr. Holm:

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

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

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



Comment #313 (EPA)

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

Comment

Response

1

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

2

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

3

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

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

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

Sincerely,


for John F. Wardell
Director
Montana Office

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

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

Response

Comment

Enclosure

cc: Cynthia Codyfalia Johnson, EPA, 8EPR-N, Denver

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

Environmental Impact of the Action

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

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

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

EU -- Environmentally Unacceptable: The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unacceptable 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 unacceptable impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 -- Adequate: EPA believes the draft EIS adequately sets forth the environmental 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.

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

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

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

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

Brief Project Overview:

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

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

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

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

Comment

Response

Comments:

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

4

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

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

5

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

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

4. Please see the responses to #1 and #2 above.
5. Appistoki Creek is in Two Medicine. We have corrected the text in the alternative descriptions to include these actions. Necessary permits will be obtained prior to any work. We considered moving structures out of the floodplain at Rising Sun. However, because the structures are historic, we instead moved the overnight use out of the floodplain.

Comment

Response

- 5 Corps of Engineers. We recommend that the National Park Service contact the U.S. Army Corps of Engineers to assure that the proper 404 permits necessary for channel maintenance or construction work in or near waters of the U.S. are obtained prior to carrying out such work (Contact Mr. Allan Soziale of the Corps of Engineers Office in Helena at 406-441-1375).
- We also encourage evaluation of options to move buildings, structures and other developments out of floodplains to the maximum extent possible to avoid the need for "channel maintenance work" that constrains free flowing stream channels, and that may further destabilize stream channels. We realize, however, that some of the buildings and developments in Glacier Park floodplains may not be relocated due to their historic and cultural values. We support removal of the Johnson, Janner, Hydro and Boys I And II dormitories located in the Soyler Creek floodplain in the Lake McDonald developed area, and encourage consideration of removal of other structures located in the floodplain if at all possible (page 2-25, 2-31). We also we encourage consideration of removal of structures in the floodplain at the Rising Sun developed area, and locating replacement housing and guest accommodations outside the floodplain if at all possible (page 2-41).
- 6 4) It is not clear in the DEIS how increased volumes of sanitary wastewater would be treated and handled with the Alternative B proposal to provide potable water and improved toilet facilities at Granite Park Chalet (page 2-5). Treatment, handling and disposal of sanitary wastewater in Alternative C that proposes full service facilities at Granite Park Chalet and increased employee and visitor use at the other developed areas that would significantly increase wastewater loads and treatment needs is also not clear.
- 5) We are pleased that all proposed actions would avoid wetland areas, so that wetlands would not be affected (page 4-8), and that proposed actions would not have additional impacts upon wild and scenic portions of the North and Middle Forks of the Flathead River.
- 6) We are pleased that the project would not have health or environmental effects on minorities or low income populations or communities (page 4-8).
- 7 7) We note that the DEIS indicates that improvement of visitor facilities and in some cases extending the operating season may increase visitor use in some areas including riparian and shoreline areas that could result in compaction of soils and trampling of emerging and vulnerable vegetation (page 4-41, 4-49). We encourage consideration of additional restrictions or limitations on visitor use near the developed areas or mitigation measures such as construction of walkways as needed to avoid excessive visitor trampling on and compaction of saturated soils and emerging and vulnerable vegetation. We note that some highly valued and sensitive plant communities, alpine (tundra) and subalpine (mountain) meadow plant communities may be easily damaged and slow to recover. Disturbances to sensitive or fragile areas should be avoided if at all possible.

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

Comment

Response

8

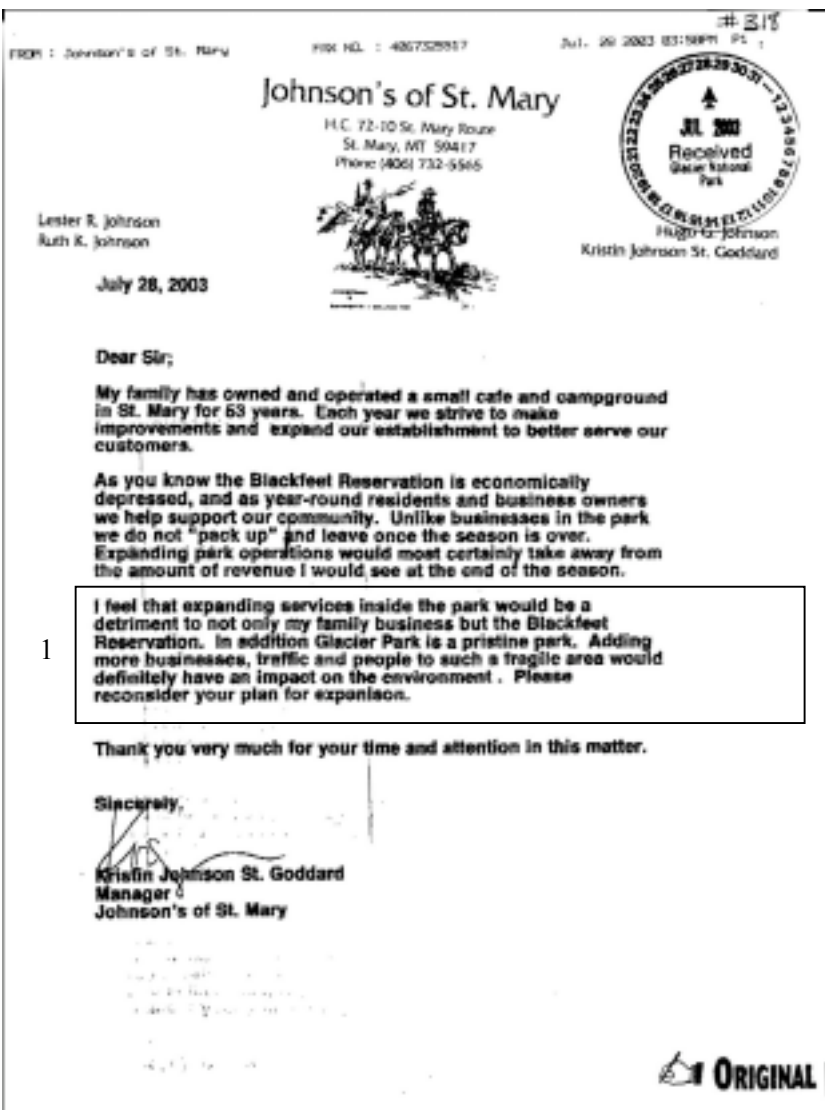
8) We are concerned about potential adverse impacts to wildlife and wildlife habitat identified in the DEIS including: permanent modification or loss of habitat including adverse edge effects; habitat fragmentation and loss of connectivity; loss of habitat complexity; harassment and disturbance resulting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

9

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

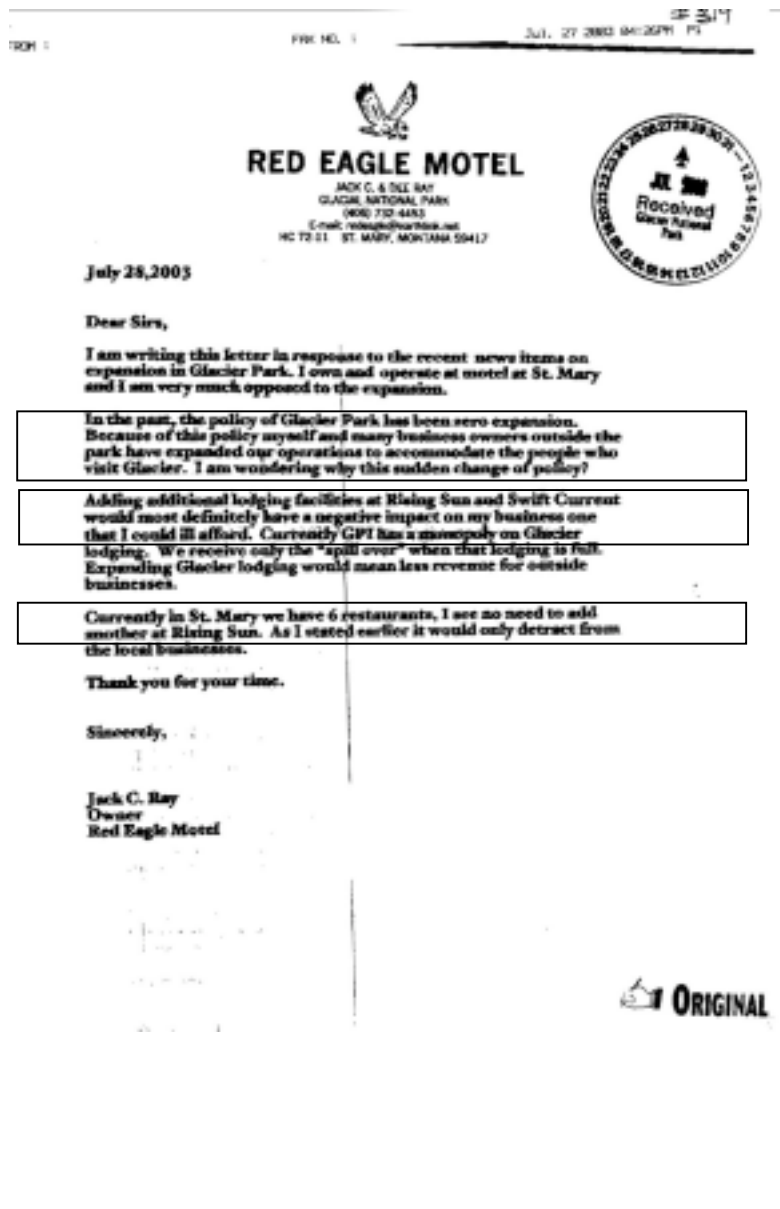
We are pleased that the DEIS indicates that there would be no impairment of air quality as a result of implementation of any of the alternatives, and no long-term cumulative impacts would be expected as a result of implementation of any of the alternatives. We support the use of guided motor vehicle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

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



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

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

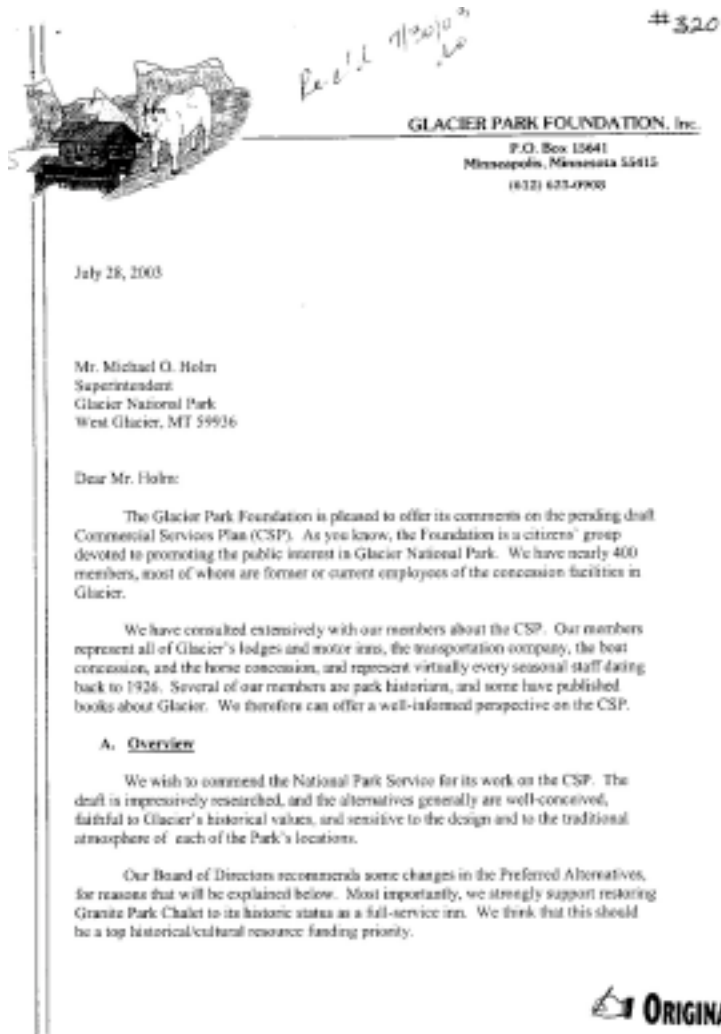


Comment #319 (Red Eagle Motel)

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

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

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



Comment #320 (Glacier Park Foundation)

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

Comment

Response

The other main changes which we recommend in the Preferred Alternatives are these:

1

- we believe that motels should remain available at Swiftcurrent as a less rustic option for middle-class travelers.
- we would concentrate employee housing in the south end rather than the north end of the Lake McDonald compound.
- we believe that the CSP should provide for a separately-bid red bus transport contract, focused on service over Going-to-the-Sun Road, and
- we believe that the Lower Dormitory at Mary Glacier should not be converted to guest use unless it is clear that the hotel compound can accommodate the increased traffic and that employee housing can be provided on-site.

Our recommendations embody a number of general principles that we think should be incorporated in the terms of the Plan. These principles should supplement the excellent "Vision for Commercial Services" set out in the draft CSP:

2

- The CSP should incorporate options for new construction which maximize public ownership of park facilities and avoid increasing private possessory interest.
- The CSP should seek to utilize concession employees as a resource, where appropriate, to assist with interpretation.
- The CSP should seek to house employees at the locations where they work, to build community spirit and avoid logistical problems.

Again, we wish to stress our approval of most points in the draft CSP. On many issues, we support the Preferred Alternative and offer additional comments or refinements which we hope will strengthen the Plan. Thanks for reviewing the following comments.

II. Interaction of Visitors and Employees

We support the general principle of visitor/employee separation, as applied to housing, recreation, and parking areas. The CSP's concern with minimizing noise annoyances for guests and competition for space is reasonable and important.

However, we wish to emphasize a counterpoint. Concession employees can enhance the experience of visitors as sources of information and hospitality in tradition-rich facilities. The CSP should therefore promote the constructive interaction of visitors and employees as a key value. We urge these specific points for consideration in the CSP:

3

- Concession employees should receive written and oral training to assist them in helping to interpret the park experience for visitors. This training should focus on historical and natural features of the specific location in which employees work. A good model (if simplified) would be the Drivers' Manuals traditionally published by the Glacier Park Transport Company.

- Regarding motels at Swiftcurrent, please see the response to #13 below. Regarding employee housing at Lake McDonald, please see the response to #11 below. Regarding the red bus contract, please see the response to #11 below. Regarding the Lower Dorm at Mary Glacier, please see the response to #6 below.
- The decision to seek and the ability to obtain funding for a government buy-out of the concessioner's possessory interest is outside the scope of this planning effort. To accomplish the goals of the plan, any construction costs would be shared by the concessioner and the National Park Service. Regarding interpretation by concessioners, please see the response to #3 below. As we developed the commercial services plan, we strove as much as possible to provide on-site employee housing. We considered options to house employees outside the park, but it was determined to be infeasible. The concessioners have also communicated to the National Park Service that the workforce is changing in the industry. Many college-age students cannot work early and late in the season, requiring the hiring of older individuals who have families and spouses, and are not suited to a dormitory-style environment.
- We do provide orientation and interpretive training for concession employees using a variety of media, including the *Ambassador Program*, park newsletters, and general and advanced orientation sessions. We work with the concessioners to provide specialized training covering natural and cultural history of the park as well as safety.

Comment

4

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

C. Granite Park Chalet

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

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

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

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

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

3

Response

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

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

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

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

Comment

Response

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

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

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

D. Many Glacier Hotel

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

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

5

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

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

Comment

Response

5

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

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

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

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

6

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

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

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

6

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

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

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

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

7

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

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

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

Comment

Response

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

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

Comment

Response

10

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

F. Lake McDonald Lodge

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

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

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

11

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

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

Comment

Response

11

- **West Access Road.** While the Preferred Alternative's proposal of a foot and bicycle trail is attractive, we oppose closing the west access road to the ledge for historical reasons. The road is an original alignment of Going-to-the-Sun Road, still serves useful purposes, and in our opinion should be preserved. If employee housing were consolidated in the south end of the compound, as we suggest, this road would be needed to serve that area.
- **Stewart Motel.** We support closure of the motel, as proposed in the Preferred Alternative. However, we suggest that a new motel be located near the Coffee Shop (where the Preferred Alternative would place new employee housing). The present motel site is inappropriately mixed with inholders' cabins. The Stewart Motel should not be converted to employee use (as suggested in Alternative B) even for management-level employees, since conflict between employees and inholders at such close quarters would be very likely.

12

- **Possible Restoration of Cabins to Swiftcurrent.** Ten of the cabins presently used as employee lodging at Lake McDonald were originally part of the Swiftcurrent compound. If financially feasible, these cabins might be returned to Swiftcurrent as part of the proposed restoration of cabin circles there.

G. Swiftcurrent

The alternatives proposed for Swiftcurrent are creative and thoughtful. We approve the overall objectives of the draft. The Preferred Alternative has attractive points. However, we think that Alternative C is a demonstrably better plan.

The Preferred Alternative would house all the guests in cabins and would convert all four motels to employee housing. This concept has merit in enhancing the historic cabin-camp theme, but it has several serious drawbacks. Alternative C (retaining a motel/cabin mix, with new employee housing sited to the east), is a better concept, for these reasons:

13

- **Better Employee/Visitor Separation.** The main motel complex is very close to cabin circles D and I, and is immediately adjacent to the very busy Iceberg/Pinnacledome trailhead. The Preferred Alternative, thus, would not achieve good employee/visitor separation. Alternative C would place employees in the Alpine Motel building (which confines noise insofar as the rooms all open onto an interior hallway) and in new quarters east of that building, achieving a more effective degree of separation.
- **More Options for Visitors.** The motels provide an important middle-ground accommodation – more comfortable than the rustic cabins and more affordable than Many Glacier Hotel. This option has been in place at Swiftcurrent for many decades. The motels will continue to exist under either

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

13

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

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

II. Motor Vehicle Tours and Public Transportation Services

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

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

14

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

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

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

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

Comment

Response

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

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

15

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

16

1. Hikers' Hostels

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

17

2. Guided Motorcycle Tours

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

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

18

K. Underwater Diving Tours

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

L. Conclusion

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

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

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

Sincerely yours,



For the Board of Directors
of the Glacier Park Foundation

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



GLACIER OUTDOOR CENTER



July 26, 2003



Superintendent Mick Holm
Glacier National Park
West Glacier, MT 59936

Dear Mr. Holm,

Thank you for the opportunity to comment on the Commercial Services Plan released in May 2003. In reference to the section on remodeling, upgrading and in some cases, expanding the Park lodging facilities, we have a few thoughts. The section our comments refer to are between pages ES14-24.

1

1) Based on the visitor projections in the EIS, we can see no rationale for expanding the number of lodging units within the Park. At current visitor levels, there is adequate lodging in and around the Park for all but a few days of the summer. The old adage of "you can't build churches for Easter" seems to apply here. The infrastructure adjacent to the Park is now reasonable for the visitor level.

2) The plan to re-arrange rooms, improve the arrival presence and bring the rooms to the same level of service they presented when they were first built, seems well thought out and the effort should go in that direction instead of expansion of the number of rooms.

2

3) The proposed expansion of operating dates in Table ES-1 presents an additional 22 weeks of potential additional room availability. Again, expanding the length of season and number of rooms, based on the visitor projections, doesn't seem reasonable.

Some of the other expansions of services seem like they will take quite a bit of administration and monitoring to provide a service that appeals to, or will be used by, a very small population of Park visitors. Not knowing the projected number of users, it seems things like skins diving, or in the case of Glacier's cold lakes, dry-suit diving, might be far more trouble than gain.

Sincerely,

Orino
Orino Wieringa
Glacier Raft Co.

ORIGINAL

Whitewater Rafting • Wilderness Trips • Fly Fishing • Fly Shop & Outdoor Store • Log Cabins • Ski & Snowboard • Rentals & Storage
Reservations 1-800-235-6781 • Office 406-888-5454 • Fax 406-888-5541 • email: go@glacieraft.com • www.glacieraft.com
P.O. Box 230 • West Glacier, MT 59936

Comment #322 (Glacier Outdoor Center)

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

#325

Rec'd
7/20/03
cd

7-28-03

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

Dear Superintendent Holm,

We would like to comment on the Commercial Services Plan.

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

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

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

1

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

2

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

 ORIGINAL

Comment #325 (West Glacier Mercantile)

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

Comment

Response

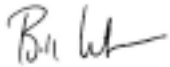
2

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

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

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

Sincerely,



Bill Lundgren
for West Glacier Mercantile
West Glacier, MT 59926

#326



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

Bob Clark
Conservation Organizer
sierrabob@wildrockies.org

Rec'd
7/30/03
10

Superintendent
Attn: DCSP/DEB
Glacier National Park
West Glacier, Montana 59936
glac_public_comments@nps.gov

July 27, 2003

Dear Superintendent,

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

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

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

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

Sincerely,

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

ORIGINAL

Comment #326 (Sierra Club)

Thank you for your comments.



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

#336



July 29, 2003

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

Dear Superintendent,

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

Many Glacier Area

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

Rising Sun Area

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

1

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

2

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

3

Two Medicine Area

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

4

Boat Tours and Transportation

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

5

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www.montanaarb.com/gjboats



Comment #336 (Glacier Park Boat Co.)

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

Comment

Response

6

Guided Day Hiking

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

7

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

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

Sincerely,



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

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



Dear Superintendent Holm,

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

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

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

Minor issues:

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

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

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

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

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

ORIGINAL

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Comment #338 (Glacier Institute)

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

Comment

Response

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

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

Other Areas of Concern:

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

Also, this sentence appears under the above heading:
"No authorization for cultural and natural history hikes has been issued."

2 We are concerned that this wording does not make clear the situation that now exists as a result of our cooperative efforts with GNP.
 We feel that the Institute currently provides educational opportunities within the park that are not provided by other cooperators/concessioners, and we feel that this distinction should be made. The Institute does offer educational hikes, as part of our programs, on a variety of subjects including cultural and natural history, which are led by instructors of the highest qualifications.

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

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

Comment

Response

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

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

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

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

Sincerely,

The Glacier Institute

Alice F. Hitchison
Alice Hitchison, President

7/29/03

Paul Thompson
Paul Thompson, Executive Director

340



Michael Holm
Superintendent
Glacier National Park
West Glacier, MT 59936

Commercial Services Plan

Dear Superintendent Holm:

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

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

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

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

1

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

2

2003 Backcountry Service Revision Project
P.O. Box 415734 • Denver, Colorado 80241-5734
www.mtawilderness.org

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Comment #340 (Montana Wilderness Association)

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

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

2. See response to comment #273.

Comment

Response

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

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

Thank you for your attention to these thoughts.

For a wild, enduring Glacier Park,



Bob Decker
Executive Director



343



July 27, 2003

Mick Holm
Superintendent
Glacier National Park
West Glacier, MT 59936

ORIGINALLY FAXED

Dear Superintendent Holm:

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

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

1

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

2

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

APRIL 11 TO OCTOBER 31 - ST. MARY, MONTANA 59913
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EMAIL: smary@glpnps.com

TELEPHONE: 866 733 4831 FAX: 406 841 6291
TELEPHONE: 208 726 4279 FAX: 208 726 4281
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Comment #343 (The Resort at Glacier)

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

St. Mary Lodge & Resort

2

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

3

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

4

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

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

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

St. Mary Lodge & Resort

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

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

5

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

6

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

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

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

7

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

St. Mary Lodge & Resort

8

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

Sincerely,

Roscoe Black
Managing Director

8. Thank you for your comments.

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July 29, 2003

Superintendent Helm
Glacier National Park
West Glacier, MT 59936

re: Draft Commercial Services Plan

Dear Team Members,

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

Additional comments to the plan:

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

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

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

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

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

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

3 **I would also like to know the status of a future visitors' center at the 'T' of Going-to-the-Sun Road and Camas. Is the project on schedule...when, exactly where, etc.**
Thanks for listening to my suggestions on the commercial services plan. As you can read through my comments I believe Glacier National Park should provide many visitor services but NOT be in competition with private enterprise at taxpayer expense.

Sincerely,

Dee Brown
Dee Brown, Owner

ORIGINAL

Comment #344 (Canyon RV & Campground)

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

#345



NATIONAL PARKS CONSERVATION ASSOCIATION*

Protecting Parks for Future Generations®
July 30, 2003



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

Dear Superintendent Holm,

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

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

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

Issues Considered Beyond the Scope of this Plan

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

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

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

1

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Comment #345 (National Parks Conservation Association)

1. See response to comment #340.

Comment

Response

| | |
|---|---|
| 1 | <p>the initial parks to adopt such a plan. The park has clearly stated its intent vis-à-vis this issue through the GMP, and it would be inconsistent of the park to not reaffirm it through this process. As such we believe such a reaffirmation of existing GMP policy is well within the Commercial Service Plan scope and should be added.</p> |
| 2 | <p>Monopolies Held by Concessioners – NPCA believes that whenever possible, commercial services within a national park unit should be diversified among multiple vendors. We recognize that sometimes this cannot be the case. However, competition not only in the bidding process but also in the operations of a service offered to the public will undoubtedly result in a higher quality and a greater diversity of product. This is a public policy issue that appropriately should be addressed in this plan. NPCA believes that competition, coupled with rigorous quality controls, is healthy and beneficial both to the park resource and to visitors. We recommend that the final Commercial Services Plan closely analyze all services that currently have a single vendor providing that service in Glacier, and that GNP look to adopting systems and policies that provide visitors with a broader array of vendor choice and options. Choice and competition can bring higher quality services and lower prices, especially when coupled with on-going standards for performance review established contractually by the park.</p> |
| 3 | <p>Concessioner's Possessory Interest – While the decision for the government to buy out GPI's possessory interest in park lodges may be outside the scope of this plan, we believe that the plan should clearly state the interest of the National Park Service to bring the hotels, lodges and other buildings used as commercial entities into public ownership.</p> <p>Granite Park Chalet</p> <p>We strongly support the preferred alternative to maintain Granite Park Chalet as a hiker's shelter with upgrades to the water and toilet systems. This level of service is more fitting with the alpine backcountry wilderness of the park, whereas the full-service option cannot be regarded as an essential services, especially given the fact that the full-service option remains at Sperry Chalet.</p> <p>The hiker shelter system has worked very nicely at Granite Park Chalet, and it has been popular with visitors. A hiker shelter provides an important and affordable alternative for overnight hikers who choose not to camp and who cannot afford the expensive, full-service option of Sperry Chalet. Our experiences at Granite Park Chalet have been positive.</p> <p>The preferred alternative not only is much more affordable for visitors than Alternative C (the full-service option), but it will have less environmental impact and will be less expensive for taxpayers.</p> <p>We take issue and disagree with a number of critical characterizations offered by some interests in regards to Granite Park's current management structure, protocols and standards. For the record we would offer that these allegations come from the same private group who pledged to raise \$1 million in private funds for restoration of the backcountry chalets, who used this pledge to secure several matching congressional appropriations, then failed to deliver more than a tiny fraction of the private pledge. This past track record, while certainly not disqualifying this interest from expressing their opinion on this issue, certainly sheds a light of skepticism on their current preferred direction for management of this chalet.</p> <p>Guided Day Hiking</p> |
| 4 | <p>We support the proposed restrictions on group size under Alternative B, and we believe the same limits should be placed on interpretive hikes led by Glacier's own rangers.</p> |

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

Comment

Response

| | |
|---|--|
| | <p>We support the concept of expanding the scope of guided day hiking to include authorization for cultural and natural history hikes.</p> |
| 5 | <p>At the same time, we strongly believe that the expansion of guided day hikes should not be used as a justification to diminish interpretive hikes provided directly by the Park Service. We are concerned about national trends of commercializing and privatizing national park services historically provided by NPS employees, and we don't want to see this situation emerge in Glacier. The need to double the amount of allowable day-hike user days to 5,000 annually over the recent six-year average (as proposed in the draft) is not supported by any offered documentation regarding demand. Whereas such an expansion may be important, we do feel that it must be accompanied by clear and compelling data supporting such a move. To that end, therefore, we would like to see the Final EIS provide two data trend lines which we feel would either support such an expansion or lead to a determination that it is not needed. 1) How many guided day hikes have Glacier rangers provided annually since 1990, ideally as measured by user days as well as actual number of hikes? 2) How many commercially guided hikes (as measured by user days and actual number of hikes) have concessioners provided annually since 1990. Here we're particularly interested in the range of annual user days, not just the 1995-2001 average.</p> |
| 6 | <p>Our earlier comments above regarding multiple vendor choices for a type of service take traction in this discussion regarding guided day hikes. We suggest the draft be clarified to state that more than one commercial guide service will be provided permits-to-offer this service within an overall cap. We remain open to whether this should occur on a guide permit basis or whether it should be restricted to just a few operators. In either case, we strongly urge the park to mandate that guides be required to participate in a Glacier-specific training program and a system should be established to ensure that services are of the highest quality and that information provided to visitors is accurate and current.</p> |
| 7 | <p>Guided Underwater Diving Tours - We believe the proposal to offer this new commercial service has merit, and we support this added service at Lake McDonald, Shoshone, Josephine, Swiftcurrent and St. Mary Lakes. However, we do not support providing this service in the Two Medicine Valley. The General Management Plan states that the two Medicine area would be managed to protect the wild character of the area. As the GMP states, "While Two Medicine is a developed area, it would remain small and would not provide all services." We agree that Two Medicine should maintain lower levels of commercial services than other front country areas. Underwater diving tours are not an appropriate use in Two Medicine.</p> |
| 8 | <p>Firewood Sales - We support the proposal to allow on-site firewood sales. Special consideration for providing this service should be given to the Blackfoot Tribe, which already has initiated efforts to sell firewood to park campers. Any firewood concessioner should be required to provide only dry, seasoned firewood. We have experience with sales of green, unseasoned firewood in Canadian parks that create excessive smoke and air pollution in campgrounds.</p> |
| | <p>Public Shoreline - The preferred alternative is reasonable.</p> |
| 9 | <p>Boat Tours - The preferred alternative is reasonable and acceptable with the possible exception of adding tour boats at Two Medicine Lake. We would question why it is regarded as necessary and appropriate, especially given the relatively small size of the lake and the GMP direction that Two Medicine should be less commercialized than other front country areas in the park. Unless the final plan provides more compelling justification for expansion of this commercial service at Two Medicine, we urge the park to alter the draft and eliminate this provision.</p> |

5. We agree. We do not wish commercially guided hikes to replace National Park Service naturalist-led hikes, since they are part of the valuable interpretive education the park offers the public. The National Park Service does not intend to reduce the number of naturalist-led hikes it currently offers. However, the number of hikes is a function of operating budgets and cannot be guaranteed.
6. The National Park Service is seeking to expand opportunities for commercially guided cultural and natural history hikes. The annual cap established in this plan would allow for growth in all commercially guided hikes at a level that was determined to be acceptable. Figures for Glacier National Park-led hikes annually are: in 1999, 19,521; 2000, 15,296; 2001, 15,781; 2002, 14,900; 2003, 10,319. The number of annual commercially guided day hikes by our hiking concessioner ranged from 85 in 1990 to 2,852 in 1998. From 1992 to 1999 there was a 615% increase in the number of guided day hikes.

Our operation plans for concessioner services require specific training on Glacier National Park policies and issues such as working safely in grizzly bear country. We ensure that the companies who contract with us to provide commercial services in the park deliver high quality services and present accurate current information on the park to visitors.
7. The alternative to exclude guided underwater diving tours in Two Medicine was considered but rejected. Please see this section of the *Final CSP and Final EIS*.
8. While we would encourage offers from tribal members, the National Park Service does not have the authority to provide preference for any group awaiting concession contracts. We would include your suggestion to require the concessioner to provide only dry, seasoned firewood in any operating regulations for these authorizations.
9. Adding a second vessel does not conflict with the General Management Plan and the environmental impacts were determined to be minor to moderate.

Guided Interpretive Motor Vehicle Tours and Public Transportation Service

10

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

11

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

12

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

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

Horseback Riding – We support the preferred alternative.

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

NPSA envisions a future transportation system that increases visitor transportation options over the currently skewed reliance on private vehicles. While increasing visitor choices, this system should reduce traffic and parking congestion, thereby freeing park resources that are currently expended to resolve such congestion (such as the 10-foot pile to our 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.

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

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

Comment

Response

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

Step on Guide Service - We support the preferred alternative.

13

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

14

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

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

Sincerely,

Steve Thompson
Glacier Program Manager

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

Tony Jewett
Senior Regional Director

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

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



Bicycle Coalition of Maine

Safety • Education • Access



385

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Dear Superintendent Mick Holm,

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

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

1

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

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

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

Sincerely,

Jeffrey Miller
Jeffrey Miller
Executive Director

ORIGINAL

Comment #385 (Bicycle Coalition of Maine)

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



GLACIER WILDERNESS GUIDES
MONTANA RAFT COMPANY

#391

Superintendent
Glacier National Park
West Glacier, MT 59937

August 15, 2005

Re: Commercial Services Plan

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

Guided Day Hikes:

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

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

- Boundary Trail
- Astams Creek/Firebrand Pass
- Siyeh Pass
- Piegan Pass
- Swiftcurrent Look Out
- Griswold Glacier Overlook
- Swiftcurrent Pass
- Appokani Falls
- Granite-Highline to Ahern Pass
- Loop Trail
- Cobalt Lake
- Dawson Pass
- Two Medicine Pass
- Scenic Point
- Kootenai Lake

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ORIGINAL

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

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

Comment

Response

2

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

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

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

3

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

4

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

Private Vehicle Shuttle:

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

Guided Bicycle and Horse:

Agree with preferred alternatives on both.

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

Comment

Response

5

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

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

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

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

Happy Trails,

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

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

#429

Comment #429 (Swan River Tours)

Thank you for your comments.



Jan Knox
08/22/2003 12:44 PM
MDT
To: Connie Stahl/GLACNPS@NPS
cc:
Subject: Concession changes

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

Jan E. Knox
Chief Concessions Management
Glacier National Park
(406) 885-7900
(406) 885-7904 Fax
--- Forwarded by Jan Knox/GLACNPS on 08/22/2003 12:44 PM ----



"alan@back"
swanrivertours@bigplanet.com
swanrivertours@bigplanet.com
08/22/2003 11:03 AM
CST
To: Jan_Knox@nps.gov
cc: Swan@bigplanet.com, River@bigplanet.com, Tours@bigplanet.com
Subject: Concession changes

Hello Jan,

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

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

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

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

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

Sincerely,

Al Cluck
Swan River Tours





BLACKFEET NATION

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#432

September 23, 2003

Mick Holm
Superintendent
Glacier National Park

RE: TRAIL RIDES IN GLACIER NATIONAL PARK

Dear Mr. Holm,

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

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

ORIGINAL

Comment #432 (Blackfeet Nation)

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

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

Comment

Response

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

Sincerely,


Jay St. Goddard
Chairman
Blackfoot Tribal Business Council