



P.O. Box 4310, Whitefish, Montana 59937

May 20, 2015

Dear Superintendent Mow:

This letter concerns the Going-to-the-Sun Road (GTSR) Corridor Management Plan project. Please include this letter in the comment record.

We commend you and your team for addressing the vexing and growing issues of visitor experience, and resource and climate impacts associated with the GTSR. We offer the following comments on the contents of the spring 2015 GTSR management plan newsletter. Please add our name to your list of interested parties wishing to receive this newsletter and updates on the planning process.

We agree strongly with the vision statement, particularly its inclusion of addressing climate change in the context of the GTSR management.

We think the goals statement is excellent. However, we think GNP should add two explicit goals:

- 1) Reduce private vehicular traffic and use on the GTSR, and
- 2) Set explicit targets and standards for reducing CO₂ emissions from private vehicles on the GTSR. The NPS is required to address climate change. GNP needs to lead on climate change management. CO₂ standards would be a good place to start.

We think these two additional goals, if incorporated into all alternatives meets the criteria for 'reasonable alternative.' The scoping document states that, "Reasonable alternatives must also be economically and technically feasible and show evidence of common sense."

Prelim Alt 1: No action. This alternative would not be responsible and would not meet vision or goals. We think that it certainly will not meet the goals of reducing private vehicular traffic use or lead to a reduction in CO₂ emissions.

Prelim Alt 2: Build additional infrastructure. This alternative, we think, will accommodate and lead to increased visitor use. We think this alternative describes a rational, NEPA-required alternative, but think it would not lead to meeting the articulated

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vision or goals, reduce traffic, congestion, or reduce CO2 emission. This alternative could lead to loss of natural resource values due to construction impacts and displacement of natural features and values by constructed facilities. Constructed facilities would degrade the visitor experience by increasing the presence of man-made features, motor vehicles and human crowding. Additional infrastructure and roads often lead to simply increasing use and congestion.

Prelim Alt 3: Increased Shuttles. This preliminary alternative could work, but we feel that the other features articulated under this alternative are not extensive enough. For example, in addition to evaluating bike-only days, the NPS could assess switching driving directions, East to West and West to East, on alternative days, freeing up one lane each day for bicycles and pedestrians. This alternative could reduce CO2 emissions but may not meet a standard for reducing CO2 emissions.

Prelim Alt 4: Discontinue Shuttles. We think that this alternative meets the NEPA requirement for a reasonable alternative. This alternative could reduce private car CO2 emissions through the controlled access plan. However, the reduction in CO2 may not be meaningful or meet a standard, were one adopted as a part of this process.

Prelim Alt 5: Adaptive Response. This preliminary proposal seems ambiguous to us as to what constitutes a trigger to implement different strategies. We think ‘triggers’ have already been reached or exceed with respect to visitation levels, impacts on resources, CO2 emissions, visitor experience, park funding, and impacts to cultural and historic landmarks. All of these issues have already exceeded a threshold of acceptability or means. We think THIS EIS effort should address how to respond in the near future with a decisive direction that ultimately reduces private vehicular access, CO2 emissions, and impacts to resources, and improves the visitor experience. This EIS should then articulate how to phase in those changes with the least amount of social or economic displacement in the shortest amount of time. This alternative ‘concept’ does not appear to be decisive, and may lead to kicking the can down the road. The need is now. A decisive decision is needed soon.

No alternative proposes to eliminate private vehicular use on any or all of the GTSR, or (alternatively stated, proposes an “All Shuttle” system). An alternative that provides for an All Shuttle system and eliminates all private vehicular use on all, or part, of the GTSR could be technically and financially feasible and would be a common sense alternative to the considerable impact private vehicular use is having on park resources, visitor experience, air quality, and climate change. Other units of the NPS have implemented private car bans on portions of their road system. An alternative that proposes limiting or eliminating private vehicular use could do so for all or just part of the GTSR. We would strongly favor eliminating private car use from at least Avalanche Creek to Sun Point during at least the peak season.

GTSR is a national treasure that, though recently rebuilt at enormous public cost, does not deliver a peak experience during peak season. Reducing CO2 emissions must be a key goal of this planning effort, in addition to improving visitor experience and reduction in resource damage.

We thank you for the opportunity to comment on the proposed Going-to-the-Sun Road Corridor Management Plan project. We wish you good luck in coming up with a sound, strategic plan for conserving the best of Glacier National Park.

Sincerely,

A handwritten signature in black ink, appearing to read "Dave Hadden", with a long horizontal flourish extending to the right.

Dave Hadden, Ex. Dir.
Headwaters Montana
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