



GLACIER-
TWO MEDICINE
ALLIANCE

January 6, 2025

Superintendent Dave Roemer
Glacier National Park
PO Box 128
West Glacier, MT 59936

Re: Glacier National Park's Visitor Use Management Plan

Submitted electronically via <https://parkplanning.nps.gov/projectHome.cfm?projectID=126808>

Dear Superintendent Roemer,

Thank you for the opportunity to submit comment on the development of a preliminary strategy for holistically managing visitor access, travel, congestion and resource protection in Glacier National Park.

Glacier-Two Medicine Alliance (GTMA) is a community-based, grassroots conservation organization located in East Glacier Park on the Blackfoot Nation. GTMA is dedicated to the protection, stewardship, and shared enjoyment of the lands, waters, and wildlife of the Badger-Two Medicine and surrounding areas in Montana's Crown of the Continent ecosystem, including Glacier National Park (Glacier). GTMA has a long history of involvement in advancing the conservation and science-based management of Glacier, a place our nearly two thousand members and supporters' value and visit for its wilderness, native species, or rich cultural heritage.

Rapid growth in visitation in recent years has contributed to the degradation of park resources, strained its administrative capacity, and reduced the quality of the visitor experience for many people. Visitation is likely to continue to grow as more people discover Glacier via social media, networks, and marketing, and air travel continues to expand, a process Glacier cannot control. Managing visitation to protect the Park's natural, cultural, and historic resources, while also providing for the public's enjoyment of our park is a difficult *systems* problem to solve. All strategies involve trade-offs. Infrastructure has real capacity limits. The Park's budget is flat and the appropriations and administrative process does not facilitate a flexible response.

Given these realities, we strongly applaud Glacier for being proactive in trying to find a better long-term solution than just letting people in. The overwhelming gridlock and congestion that

too often characterized the Going-to-the-Sun Road Corridor (GTSR) during the summers prior to the pilot reservation system was neither acceptable nor enjoyable. We particularly appreciate the Park leadership's commitment to early and sustained public engagement during this process. We look forward to working with you, local communities, and other partners to identify the most effective strategies to manage visitor use to protect park resources while providing meaningful opportunity for a transformative visitor experience.

Our comments follow the structure suggested in the planning portal.

Section I: Response to Glacier's Questions

Question 1: Do the management goals for the different areas of the Park reflect your desired experiences of in those areas.

We generally support the management goals laid out for each area of the Park. They reflect the different, unique characteristics that visitors find and cherish about each of these four areas of the Park. The goals rightly recognize that each area does, and should, provide qualitatively different experiences.

Going-to-the-Sun Road Corridor

The GTSR Corridor is the heart of the visitor experience for the vast majority of visitors to Glacier, and for good reason. Traversing this corridor is a magnificent experience unparalleled for both its natural beauty and its engineered aesthetic. We largely agree with the Park's vision for GTSR corridor as articulated in the newsletter. This corridor should remain the primary center of the visitor experience, a place all visitors can have an opportunity to see during the seasons the road is open by some means of conveyance although not necessarily by private car.

Long-term visitor use management should seek to facilitate public access to the GTSR, rather than re-direct visitors to lesser visited areas of the Park or quieter adjacent landscapes. We expect GTSR to be crowded, especially during peak months. People should be distributed sufficiently in time and space to allow traffic to flow through the corridor in a safe and efficient manner. Visitors should be able to find a diverse level of services and enjoy a diversity of recreational experiences within the corridor, not just crowded trails and pullouts. Most importantly we agree with the objective that management of "the roadway and associated visitation do not interfere with ecosystem integrity, wildlife habitats, and tremendous biological diversity." The GTSR cuts through vital wildlife habitat and native plant communities. Their protection must take precedence over visitor convenience.

Many Glacier

GTMA supports the vision for Many Glacier articulated in the newsletter. Many Glacier has long been, and should remain, the second major hub of visitor activity and services after the GTSR corridor. Visitors to this area do and should expect it to encounter crowds around the Many Glacier Hotel, Swiftcurrent and within a few miles of this hub on the trails. The area should continue to provide a diverse level of services and recreational options. We support the emphasis on articulating continued Tribal connections to the area to visitors, as well as accommodating

access and traditional use by tribal members. One addition that should be made to the goals concerns wildlife. The Many Glacier Valley is perhaps the most outstanding place to observe wildlife in their natural habitat, especially moose, black and grizzly bears, in Glacier. Visitor access and management strategies should be evaluated for how they facilitate wildlife watching in a safe and responsible manner, in addition to other natural and cultural resource protection, recreational opportunities and historic preservation.

North Fork

GTMA fully supports the vision of the North Fork remaining an area managed for its rustic, primitive, and remote characteristics where natural processes dominate the experience. Managing visitation to maintain the area's *wilderness* character should also be an explicit part of this vision. Consistent with these values, commercial services should not be provided inside the Park in the North Fork. Historic park infrastructure should be maintained in a rustic style. Greater interpretation of Kootenai or other Indigenous use of this area could be provided (current interpretative materials primarily focus on the settlement and park management eras, or natural history).

Two Medicine

GTMA fully supports the vision of the Two Medicine area as a quieter, less congested and largely non-commercialized center of visitor activity, with an emphasis on protecting the ecological, scenic and wildlife values of the area. This is a place that is particularly important to the communities of East Glacier and Browning for recreational or cultural purposes. Visitor use management should seek to provide a variety of uncongested hiking and recreation experiences in the valley. This is typically the case now given the existing parking limitations. Facilitating continued Tribal cultural connections, access and use of the area should also be a priority of management.

Question 2: How might we manage growth in visitation in Glacier National Park in a way that protects what makes Glacier a special place?

We agree that Glacier needs to continue to grapple with the complex subject of establishing adaptive capacity limits for different areas of the Park, rather than just trying to endlessly accommodate an ever-growing number of people inside the Park at one time. This is difficult and there are no easy answers. The GTSR Management Plan completed in 2021 provided beneficial insights into how the Park operates as a *visitation system*, the impacts of different activities and actions in the corridor and how they affect resources in the corridor as well as other areas of the Park. However, many of the targets for acceptable levels of visitor use, such as on the Highline trail, were already exceeded before the plan was finalized. A review and update of capacity targets and resource monitoring thresholds for different locations and resources across the GTSR corridor and park is likely warranted.

The reservation system piloted the last few years has been a helpful step toward dispersing use across the corridor. Its main benefit has been limiting congestion at chokepoints, such as entrance stations, or certain parking lots. We encourage the Park to continue to analyze whether

the current level of permits adequately protect park resources and ensure a variety of experiences within the GTSR corridor, or if the number of daily permits may need to be reduced in the future.

Question 3: We've developed strategies for your consideration. Are there other strategies or changes to the listed strategies that should be considered and analyzed that are not already presented?

We first comment on the general parkwide strategies suggested, then provide comments on specific area strategies.

Reservation Systems

Vehicle-entry

GTMA fully supports a reservation system to manage visitor entry into specific areas of the Park during peak hours during the busiest months of the year. We applaud Glacier's efforts to experiment with different approaches to managed access the past few years. This pilot process has successfully demonstrated that a reservation system can alleviate the worse congestion and reduce the myriad negative impacts it creates.

We appreciate the tireless efforts the Park has made to work with local communities and visitors to understand, study, and learn from this pilot system the past few years. We encourage continued scientific experimentation and refinement of this system. We trust the Park to make the best decision based on the data and on-going public input, and to adapt the system as needed to best provide equitable public access and strong resource protection.

Some aspects of the pilot system we think have worked well:

- Controlling access to the westside of GTSR at Apgar rather than the West Entrance. This reduced frustration of being turned away as it allowed people to still get into the Park so they could enjoy the views from Lake McDonald, go for a hike, or to take the shuttle across GTSR.
- Controlling access to the eastside of GTSR at Rising Sun (or alternatively Sun Point), rather than St. Mary Visitor Center, or no control point. This reduced frustration of being turned away as it allowed people to still get into the Park so they could enjoy the views along St. Mary Lake, go for a hike, take a boat tour, or to take the shuttle across GTSR. Elimination of the control point did not seem to create the flood of people circulating from Kalispell to St. Mary and back west we had anticipated. It did help spread people out across the corridor and provide a place to send people who did not have a GTSR reservation.
- Ending the control period in the mid to late afternoon, which allows time for those without a reservation opportunity to still enjoy a specific area of the Park.
- Ample allocation of permits to the day before reservation block to allow for more spontaneous visitation by locals and out-of-towners alike.
- Reservations that allow for re-entry during the valid period of time.

Some aspects of the pilot system that we didn't think worked well:

- GTSR reservation control at the west entrance. It backed up traffic onto US-2, creating unsafe conditions, and led to high levels of visitor frustration because they felt shut out of the Park.
- Ending the reservation period for GTSR in early September. The early September termination date created a huge surge in visitation, which led to the recurrence of the issues the reservation system intended to alleviate, including traffic backups on US-2 outside West Glacier. September is no longer shoulder season, a reality to which the Park has been slow to adjust (i.e. staffing, campground closures, shuttle system etc. all reflect a prior era of visitation and climate).
- Reservation system for Two Medicine. Simply closing the gate when the area is full worked better from our perspective, and that of East Glacier business owners and residents that we talked with. No reservations better allowed for full utilization of the existing parking in the area as well as flexibility and spontaneity for visitors and locals alike who wanted to go to Two Medicine.
- Two Medicine and St. Mary not mirroring each other in terms of restrictions. During the season that Two Medicine had no reservations (but GTSR did at St. Mary), the area was overrun with people (many of them directed there by the Park service) who were waiting for the gate to open at St. Mary. This created managerial challenges and made access difficult for people who explicitly wanted to go to Two Medicine.
- Service reservations exploited for vehicle reservations. Too often people reserved a tour or a campsite simply for the vehicle reservation that accompanied it. While tour operators could resell no-show tickets at the last minute, campsites often sat open waiting for the reservation that never showed. This frustrated people looking to camp and exacerbated crowding at other sites. Some penalty for no-shows on camping reservations should be considered.

Some suggestions for continuing to work out the best strategy:

- Make some portion of the permits available in-person, such as at the Apgar or St. Mary's visitor centers, rather than solely on Recreation.gov. This would provide an option for people without smart phones or other internet, as well as some spontaneity, which can be part of the fun for vacations. If regulations do not allow direct transactions, create a kiosk in these locations for access to Recreation.gov. This also provides an opportunity for visitors to visit with a uniformed park staff and learn about responsible visitation.
- Extend the GTSR reservation period later into the fall. The reservation system should stay in affect at least as long as Logan Pass Visitor Center is open.

Timed-Entry

We support Glacier's decision to pilot timed-entry this summer. In theory, it should alleviate the morning surge making for smoother movement through the corridor. However, it does create yet another detail a park visitor has to navigate to plan their trip. We imagine this will create frustration that may more than diminish any gain. We look forward to learning with you.

Daily Reservations

The daily reservation approach has, from what we have heard and experienced, mostly worked well. The daily reservation's advantage is it allows visitors flexibility to enter as they wish on

that given day, and is likely easier to administer as folks arriving before their set entry time won't have to be turned back.

Parking Reservations

We do not think parking reservations is likely to be an effective strategy. It will likely lead to open, unused parking spaces either by no-shows, or vacancy gaps between when one reservation departs and the next arrives. The current reservation system for road access and campgrounds already produces frequent no-shows by people who purchase a service just so they can secure access to GTSR. This takes away opportunity from other visitors, causing frustration.

An alternative to consider is time-limited parking (i.e. 30-min; two hours, no overnight) that remains available on a first-come, first-serve basis. This could be paid or unpaid. The advantage to this over a parking reservation is the elimination of no-shows and vacancy gaps, maximizing utilization rates while increasing turnover. Circling a parking area with vacant yet unavailable spots is a sure recipe for visitor frustration. For either alternative to work, sufficient enforcement capacity (i.e. personnel, tow-trucks) must exist. Does this capacity currently exist? If not, where will it come from?

Shuttle-Only Access

We need more information to understand and evaluate this approach. Would this option be for areas currently without parking, thus creating a new recreational destination to help spread people out? Or would parking be eliminated (or otherwise permitted) at these locations? Current lower-use areas where access is currently limited by available parking. could see a surge in visitation, similar to what happened at Siyeh Bend when the shuttle was instituted. A clear purpose and full analysis of impacts would be needed for each proposed site.

Activity Permits

While we know activity permits have been successfully used elsewhere (e.g. Angels Landing in Zion, Half Dome in Yosemite, or even Glacier's excellent backcountry camping permit system), we have hesitations about issuing activity permits for day hikes as a strategy to increase parking turnover or alleviate congestion on high use trails. Regarding parking turnover, if most people arrive by shuttle, a permit may limit hiking numbers but have no effect on parking turnover rate. Regarding reduced impacts on trails and resources, does the Park have the data to demonstrate the level of reduction necessary to improve target resource conditions? We suspect deep restrictions would be necessary to have meaningful effects (such as less trampling of vegetation or human waste reductions). Restrictions on popular trails like Avalanche, Hidden Lake Overlook, or the Highline would likely displace people (and their impacts) to lower use areas. More information is necessary to determine if this could be an effective strategy. We would also like to learn more about how these permits would be equitably distributed (i.e. reservations, walk-up first come first serve, lottery, etc.) and enforced. Does the Park have the capacity to administer permits and control access to high use trails? This seems like it could be costly and potentially draw away personnel and resources from other needed areas unless new money was dedicated to fund the system. We also have questions about how the system would work for trails with multiple points of entry, like the Highline or Piegan Pass. If Glacier pursues this strategy, the goals for an activity permit need to be very clear (e.g. "human safety" which was

the case for both Angels Landing and Half Dome) with defensible thresholds and effective monitoring. A full analysis of impacts needs to be conducted.

Shuttle Systems

GTMA agrees that we need to re-evaluate the shuttle system as the current system was designed for a different purpose and era of visitation. The current shuttle system is aging and expensive to operate. The shuttle has also contributed to the crowding and associated resource damage in the GTSR corridor by increasing access to trails and other attractions that would otherwise be limited by the available parking or the distance a person was willing to walk or bike to get there. These impacts need to be considered in the future design of the shuttle system.

That said, we fully support some form of a shuttle system in Glacier. We would prefer a future where private cars are substantially replaced by an efficient, climate-friendly shuttle system as the primary way people experience the GTSR. A future system would ideally be tied into public transportation options connecting to Browning or the Flathead Valley, further alleviating the need for private cars. This would create a less congested corridor to the benefit of wildlife, air and water quality, and natural soundscapes as well as reduce visitor's collective carbon footprint. We also suspect, as has happened in places like Denali, people would grow to enjoy the social camaraderie and interpretive information of the shuttle experience.

Whatever shape a future system takes, it needs to be thoughtfully designed to manage the amount of people disgorged in any one place at one time so as not to overwhelm trails or other locations where access is currently limited predominantly by the amount of available parking. A full assessment of impacts to the desired conditions for a trail / area needs to be undertaken, including impacts to wildlife. We also encourage the Park to think about whether Apgar is the best origination point of a shuttle system on the west side.

Communication and Trip Planning

Effective public communication about park access, reservations, conditions, or other trip planning information continues to be a substantial issue despite individual park staff's valiant and patient efforts. We fully support continued investment in use of technology, such as websites and social media. Printed materials are also vital as not everyone has access to the internet, especially once they are physically present in areas in and around Glacier (we do not support expanded internet access across the Park, per our comments on the Telecommunications Plan). Close coordination with local businesses and visitor bureaus is essential so visitors receive consistent information. In addition to information on how to access the Park, messages should emphasize care for Glacier's resources and responsible visitation ethics.

Some additional suggestions:

- Work with a consultant and public focus groups representing different demographics to redesign the Park website to make it more user friendly.
- Develop / distribute printed materials on access and etiquette via local businesses and hotels or other common visitor attractions.
- Continue to staff a call center (thanks Glacier National Park Conservancy for the funding) so people can talk to a real person to get their questions answered.

- Negotiate with Recreation.gov to provide customer service agents that are available to the public. It should not be the duty of uniformed park personnel to make up for this terrible website's customer service problems while the site's concessionaire makes millions in profits.
- Provide alternatives to recreation.gov for making reservations, such as to the GTSR. A major source of visitor frustration is that so much information is online, yet so much of the areas around the Park have poor internet service. Other members of the public do not have the personal skills or equipment to get online.
- Provide recreation.gov kiosks at visitor centers to make and download reservations.
- Develop a vision for a substantially expanded visitor center in the Apgar / West Glacier area that can serve as a hub for trip planning and services information, as well as provide extensive interpretation information. The most efficient location is likely outside the entrance station to minimize congestion. The current center in Apgar is too small to meet visitor needs, and the Parking insufficient due to competition with the shuttle system. Developing a vision for an expanded visitor center is an important first step to attract the federal and private money needed for its construction. We encourage Glacier to work with the West Glacier community and general public in developing the vision and identifying the best location.
- Put a sign outside the East Glacier Ranger Station with real-time information on whether Two Medicine is open or closed.

Parking and Infrastructure

GTMA is concerned about the proliferation of parking on the margins of roadways that damage the soil and vegetation, facilitating the spread of noxious weeds. We applaud and encourage efforts to install rocks or other barriers to limit parking creep beyond designated areas.

GTMA does not think expanding the physical footprint of parking areas should be a general strategy. Glacier cannot build its way out of this problem and remain the special place that it is today. Rather, addressing parking congestion should prioritize strategies that improve the efficient utilization of the existing infrastructure. Strategies could include:

- re-stripe / re-design existing parking areas and pullouts to maximize the number of spaces;
- prohibit or require a permit for overnight parking in highly congested areas;
- establish time-limited parking;

While we do not oppose limited expansion of parking in specific situations, we need more information about a specific proposal, its merits, and its impacts. Resource protection, not increasing parking availability, should be the priority.

Developing new trails, or loop trails, to spread people out may have merit, but we would need to see a specific proposal and conduct full evaluation. Installation of more road-accessible bathrooms, or waste-removable toilets in popular backcountry areas, are worthy of consideration on a site by site basis. Our overarching concern with any infrastructure expansion however, is that it enhances resource conditions and minimizes human pressures on wildlife. Too often more infrastructure brings more, not less, crowding, (an experience common in the development of highways, for example), bringing us back to the same dilemma we now face in Glacier.

GTMA does support efforts to increase employee housing, whether in Park headquarters or outside the Park (such as joint accommodations with the Flathead National Forest) to help attract and retain qualified employees.

Strategies for the GTSR

A reservation system or other strategy to manage private cars in the GTSR is an essential strategy. Prior to the instigation of the pilot reservation system, the level of congestion in the corridor often contributed to unsatisfactory visitor experiences, visitor conflicts especially over parking, substantial safety issues, and unacceptable resource damage, particularly to vegetation along roadways or from the proliferation of social trails. These and other issues still largely exist, though the pilot reservation system and strategies introduced by the GTSR Management Plan have helped reduce the frequency of occurrence.

Keep control points on both ends of GTSR within the Park so people can access the Camas Rd./Apgar/Fish Creek area, or the St. Mary's Lake area without a permit.

Logan Pass may benefit from one-in, one-out controls, permit-only overnight parking, and timed parking.

We have concerns about the transformation of Oberlin Bend and Lunch Creek into overflow parking for Logan Pass. Timed parking at these locations could help prevent this.

The Big Bend social trail to the Highline trail needs to be either adopted (with appropriate analysis of effects) or closed.

We would like to see strategies to reduce the sonic signature of the GTSR explored and implemented to benefit wildlife, as well as improve visitors' ability to enjoy natural sounds in the corridor. Strategies may include limits on the number of vehicles or types of private vehicles allowed (such as certain types of motorcycles).

Strategies for managing bicycle use on the GTSR corridor also need to be explored. Glacier has seen dramatic increase in hiker – biker use of GTSR during the spring shoulder season. We support this activity but think the Park should analyze the effects it may have on wildlife and other resources, as well as what management strategies will provide for a smooth and safe experience. This includes parking at the trailhead, the distance up the road folks are allowed to ride based on plow locations and avalanche conditions, and the types of e-bikes that may be appropriate for human safety. We are particularly concerned about the prevalence of throttle bikes that allow people to speed uphill with minimal effort, dodging in and out of other bicyclists, or filming the experience. Additional park staff and volunteer ambassadors are needed during the height of this season for safety, biker etiquette and to provide resource interpretation. We support at least one week for the road to be open for hiker / biker access to Logan Pass from both the east and west sides prior to its opening to private cars.

Once the road is open to private vehicles, better communication and enforcement of day-time closure for bikes is needed.

Strategies for Many Glacier

GTMA supports the addition of a circulator shuttle that originates in St. Mary. Clear visitor capacity ranges for the valley first need to be established that support desired resource conditions and visitor experiences. Monitoring thresholds and adaptive triggers should also be incorporated into the plan. The Shuttle should not be a mechanism to pump more and more people into the valley, but rather provide alternative access that can reduce the number of private cars allowed in while maintaining manageable total visitor numbers. Sufficient weed-free parking in Babb and St. Mary would need to be leased. With a shuttle, the Parking lot at Swiftcurrent could then be reduced in size so that the campground can be expanded. This would provide more opportunity for affordable and intimate overnight experiences in the valley than the present lodging options provide, without expanding the developed footprint.

Strategies for the North Fork

Vehicular access to the North Fork should be managed at the entry station in Polebridge as this seems to be the best way to control the total number of cars in this area. Limiting the total number of cars on the road system ensures the roadways are not congested, that parking is available, and that visitor experiences as described in the vision can be met. Shuttle services could be extended into the North Fork to reduce the number of private vehicles traversing both the Outside North Fork Road, and the routes within Glacier in the North Fork. The shuttle could originate in Apgar. If properly designed, the system could enhance the ecological, social, and primitive characteristics of the area by replacing some portion of current private vehicle access while maintaining comparative low levels of total human visitation. Benefits could include reduce dust and noise, improving air and water quality along with reductions in the frequency of disturbance to wildlife. Clear targets and thresholds would need to be established and monitored.

The Inside North Fork Road (Glacier Route 7) should continue to be managed as a non-motorized pathway for hikers, bikers, and horseback riders between Camas Creek and Logging Creek (motorized access for administration and emergencies only). The closure protects key wildlife habitat, including for grizzly bears and wolves. Keeping this section of road closed to motorized traffic provides a unique biking, hiking and horseback riding opportunity not available elsewhere in the Park. The closure has added to the sense of remoteness visitors experience in the North Fork. Keeping this segment closed to motorized vehicles would likely contribute to reducing visitor carbon emissions as well.

Strategies for the Two Medicine

The Park should explore the potential for a circulator shuttle between East Glacier and Two Medicine, with a stop at Red Eagle campground. The effect on parking and congestion in both the village of East Glacier and the Two Medicine valley must be closely evaluated. The shuttle could benefit local businesses, or if parking is not appropriately designed, limit opportunities for people driving through to stop. Similarly, if the shuttle pumped significant numbers of people onto the trails in Two Medicine, it would erode the experiences the Park is seeking to provide in this valley, unless the number of private vehicles allowed in at any one time is proportionately reduced. Targets and thresholds for visitation characteristics and impacts that account for visitation from all sources of access should be developed and monitored, with built in adjustment triggers.

As discussed further in our general comments, GTMA does not think parking reservations are an effective way to manage visitation in Two Medicine. However, we're open to learning more about how they would be managed at the Boat Dock.

One change Glacier needs to make is to re-open a backcountry office. We suggest the office should be at the ranger station in East Glacier, rather than in Two Medicine, as this is an easy place to intercept CDT thru-hikers as well as the general public seeking to start a trip in the area. The closure of the backcountry office at Two Medicine in 2024 led to a proliferation of illegal camping according to CDT hikers because they did not have a reliable or efficient way to get to and from St. Mary. Re-opening a backcountry office in the Two Medicine or East Glacier area will improve compliance and, crucially, allow rangers to inform CDT hikers (and all backcountry campers) of park rules and etiquette.

Section II: General Comments

In addition to our foregoing comments, we encourage the Park to include

Prioritize resource protection, especially wildlife and wildlife habitat security

The NPS primary obligation is to resource protection, especially the wildlife therein. Public enjoyment, although a clear mandate, must not cause the derogation of park resources. The long-term visitor use strategy and plan must keep natural resource protection, including wildlife conservation, connectivity, and habitat security, as its north star.

Study the effects of GTSR on wildlife movement

We are concerned that the level of human use in the GTSR corridor may already, or in the near future, create a barrier to wildlife movement for some species like grizzly bears or mountain goats. We encourage the Park to develop research and monitoring to assess and track such impacts, and to develop adaptive strategies in the visitor use plan to help reduce any barrier effects identified.

Design and Implement a Broad Suite of Resource Monitoring

GTMA encourages the Park as part of the final plan to develop a broad suite of resource conditions to monitor for impacts from visitation. This should include social conditions, biophysical resource conditions, cultural and historic resources, fish and wildlife, park infrastructure, and park staffing. The monitoring plan should create an adaptive process to adjust visitation based on conditions and future learning.

Coordinate with Adjacent Land Managers

As Glacier develops its strategies, it needs to keep in mind how the various strategies may affect not only different areas and resources within the Park, but also the public use of adjacent lands and communities. Too often visitor use / recreation management happens without sufficient or sustained communication and coordination between the various federal, Tribal, state or local entities responsible for managing lands and recreation in the region, as well as the communities that provide the bulk of visitor services. This can lead to one agency unprepared to deal with the consequences when displaced visitors to Glacier are filling camping sites or recreating in unexpected numbers on national forest lands, for example. The establishment of some form of a

recreation coordination / communication forum consisting of land and recreation managers, tourism businesses, conservationists, and other key stakeholders in the region, could help improve coordinated recreation management across jurisdictions.

An objective of the strategy / plan should be to minimize incidental spillover into ecologically or culturally sensitive, or lightly used areas outside the Park, like the Badger-Two Medicine, northern Whitefish Range, or Bob Marshall Wilderness Complex. Conversely, visitors should be directed to areas and attractions prepared for higher-volumes of use. This could be achieved, in part, if park staff had clear guidance developed in coordination with other agencies, tourism service providers, and conservation groups on what areas outside the Park to recommend to visitors and what areas to allow visitors to discover by other means.

Explore Tribal Co-Stewardship of Culturally Sensitive Sites or Resources

The development of a visitor use plan / strategy presents an opportunity to work with the Blackfeet Nation and the Confederated Salish and Kootenai Tribes to thoughtfully consider how non-tribal members may appropriately and respectfully access culturally sensitive sites, should this issue be a priority for either Tribal Nation. In particular, we encourage park leadership to continue to engage with the Blackfeet Nation about possible co-stewardship arrangements for Chief Mountain, including the reintroduction of bison and managed non-tribal member access to this sacred site, such as requirement for accompaniment by a Blackfeet guide.

The Park should also evaluate how various visitor use strategies affect Blackfeet or CKST tribal member access, treaty rights, and resource use in the Park. Where appropriate or necessary, visitor use strategies should be tailored to minimize adverse and inequitable impacts to the maximum extent practicable.

Consider Glacier's Staff Capacity

We recognize that one of the biggest challenges created by rapidly increasing visitation is unsustainable demands on Glacier Park's staff, which leads to dissatisfaction, poor performance, and turnover. The Park's capacity to manage various levels of visitation, or to implement various strategies, must be carefully considered and appropriately weighted in its final decision. An adaptive strategy that allows the Park to adjust its practices on account of changes in staffing levels, resources (i.e. funding for a shuttle or activity permit system), or other monitored indicators, should be considered.

At present, we do not believe the public understands nor appreciates how stretched Glacier's staff and resources are. Nor does the public fully understand the barriers to addressing these limits, such as stagnant federal funding or lack of workforce housing (including both lack of available federally-provided housing and affordable private housing in adjacent communities). As the Park continues to develop its plan / strategy, it would be helpful to communicate clearly and precisely the level of staffing and resources necessary to implement the various alternative actions and, at present, to what degree the Park has the staffing and resources necessary to do so.

Expand Summertime Hiker – Biker Access on the GTSR

As more and more people are discovering, biking the GTSR when the road is closed to cars is a spectacular and rewarding way to experience the heart of Glacier. The prevalence of e-bikes has

made what was once a niche activity widely accessible. The Park should intentionally manage for a pre-motorized hiker-biker season, including greater public certainty on approximately when the road will transition to motorized access (not necessarily a specific date). We also strongly encourage Glacier to explore ways for people to experience the GTSR free of private cars every week of the motorized-access season. The Park could start to pilot a series of periodic motorized closures, such as closing the road to private cars one-day a week, or for a portion of a day (say from 6 a.m. to 3 p.m.), between Avalanche Creek and Jackson Glacier Overlook or Sun Point. Glacier could also experiment via adaptive management with some amount of shuttle access during this time. Expanding hiker-biker access on the GTSR would, at a minimum provide the following benefits: create a transformative experience for many visitors, reduce carbon emissions to benefit of air quality and climate, provide a more natural soundscape for people and wildlife, reduce crowding on popular trails, support local bicycle rental businesses.

Keep Equity in Mind

As Glacier works through various strategies, we encourage the Park to make equitable access for different demographic groups a priority. The Park should continually seek to make informational materials as easily accessible as possible, including in different languages, as well as via print and online formats. We particularly encourage continued efforts to reduce barriers for local Tribal, rural, and impoverished communities to visit the Park, such as the existing partnerships between Glacier and local schools that provide ranger-led field trips to Glacier for many Blackfeet or rural students. A major concern for us is the transition of so much informational materials along with all reservation requirements online as this provides an advantage to people with the knowledge, technology, and resources to access and navigate the internet. As the Park considers various reservation options, an in-person option (even if it's a kiosk with ranger assistance) should be provided.

Thank you again for the opportunity to comment on possible visitor use strategy. We believe the official planning process for a long-term visitor use manage plan, once it begins, should develop an Environmental Impact Statement given the complexity of this issue, and the number of environmental resources affected. We look forward to continuing to be a part of this process.

Sincerely,



Peter Metcalf
Executive Director
Glacier-Two Medicine Alliance