

28 February 2011
Box 366
West Glacier, MT 59936

Superintendent,
Glacier National Park
P.O. Box 128, West Glacier, MT 59936
Attention: Heavens Peak EA

Dear Superintendent Cartwright:

With all due respect, I strongly disagree that the NPS can legitimately embrace the Heavens Peak Lookout reconstruction project and concurrently propose the site as part of legally classified Wilderness. I read the EA carefully. Overall, information in the EA makes a case for selecting Alternative A, the No Action Alternative. However, the NPS has selected Alternative B, the so-called Preferred Alternative. The justification for selecting Alternative B is based on two factors:

(1) Gross underestimates of the project's negative impacts on Wilderness, soundscapes, and wildlife. Cumulative impacts especially are given short shrift.

(2) Excessively liberal interpretation of what activities and impacts are acceptable in classified Wilderness.

I respect the well-intentioned views of those who desire to see the remains of the Heavens Peak Lookout restored as a monument to its builders. However, it is an issue of location. If the building were in a "developed" area, or accessed by road, I probably would support the restoration. However, its location is within the heart of GNP's proposed Wilderness. The project, in this location, is the antithesis of Wilderness protection and preservation.

Unfortunately, the NPS has conjured up its own excessively liberal rules for Wilderness management, rather than adopting commonly accepted standards, thus violating the spirit if not the letter of the law. For example, GNP considers the use of chain saws acceptable in Wilderness trail maintenance (the Forest Service does not). Given the NPS history with the Wilderness Act, this pattern is not a surprise. Prior to passage of the Wilderness Bill, in 1964, the NPS spoke out against the Bill in Congressional hearings. NPS Historian Richard Sellars wrote in his book *Preserving Nature in the National Parks* (p. 193): "The Park Service chose to be territorial rather than commit to the principle of greater wilderness preservation." Grudging acceptance of even minimal standards for Wilderness continues today.

Presentation of the Lookout project to the public has followed a well-established GNP paradigm. A "proposal" is floated before the public to identify objections. Then an EA is prepared to justify the proposal and dismiss objections. EAs and EISs are intended as means of objectively and scientifically assessing environmental impacts of potential projects before decisions are made, not as documents to justify project decisions already made.

Following are some specific issues of concern in the EA:

The Heavens Peak Lookout is within the northern half of GNP's recommended Wilderness (1999 map). The Table on page 31 reads, defining impacts on Wilderness: "Moderate" impacts ". . . would appreciably affect the defining attributes of wilderness as described by the Wilderness Act." Pages ii, 25, 26, 41, and 65 of the EA describe project

impacts considered to be Moderate. In contrast to these red flags, the EA then cavalierly dismisses any concern for impacts on Wilderness.

Concerning the number of helicopter flights that will be needed, EA page 16 states that “Up to twelve helicopter flights would be used to deliver equipment and materials to the work site and remove debris.” This is reminiscent of the initial estimates of the number of flights to be made for various projects at Granite Park and Sperry Chalets. The actual number of flights greatly exceeded the “estimates.” Similarly, the number of old-growth trees to be cut in the proposed Avalanche Parking Area Expansion in 1997 was shown in Federal District Court (Missoula) to be not only an underestimate, but intentional misinformation. The relevant lesson is: the NPS habitually understates the numbers that involve negative impacts. Often, it takes legal action to force the NPS into an honest public disclosure (as it did in the Avalanche Parking Area case). Based on this pattern, no one should believe that there will be “only” 12 flights associated with this project.

EA page 16 states that the work crew will access the project camp by means of the old trail from Packer’s Roost. The trail route will be “flagged.” When Dave Shea and I hiked that trail 40 years ago, after fording McDonald Creek, we found that much of the distance involved bushwhacking through thick alders that had grown in the trail tread. The alders, plus downfall on the trail, made progress difficult and very slow.

It is hard to believe that the trail has improved itself in the subsequent 40 years. But the NPS plans to send volunteer work crews through that route, a major habitat area for grizzly bears. It seems apparent the NPS has either already “improved” the trail to some degree or will do so before it is used by work crews. If the trail is “improved” to the point of being reasonable access for work crews, the trail obviously will then be used by hikers that would otherwise avoid entering that important bear habitat area. Alternatively, if no trail work has been done, or will not be done, one can assume that crews will end up being flown in and out by helicopter, adding to the number of flights.

Whether there is trail work or not, the advertisement given this project inevitably will attract more hikers to the Lookout site, even if they have to bushwhack. This will be an invitation for unnecessary disturbance (that the EA claims to want to avoid) to grizzly bears -- an unintended consequence of this ill-advised project.

Further confusing the trail issue is the discussion on EA page 19, in which trail improvement is dismissed with an extensive discussion of the negative impacts such action would create. Then, on page 20: “A temporary trail would be required in order for work crews and livestock to safely access the project area . . .” Use of livestock is then rejected, but work-crew use of the trail is not. This is a contradiction, implying that work crews will be using an unsafe trail, because trail improvement has been rejected.

The EA includes no detailed discussion of the trail from the old camp in the saddle, to the Lookout. That section of the old trail, mostly switchbacks in talus, was mostly gone 40 years ago. What will be done on that route? Rebuilding the trail would create additional impacts and would take time. Letting crew members make their own undefined way up the very steep slope risks creating multiple erosion channels.

EA page 12 states that the NPS conducts about 50 administrative helicopter flights over the Park in a year, “with no measurable effect!” I have seen many of these flights and read the justification for most. Few are really essential. None of the authorized research helicopter flights

has been essential (I have been involved in wildlife research for more than 50 years). The NPS appears to have lost sensitivity to human noise and its negative effects on wildlife, wilderness, solitude, and quality experiences for park visitors. Without natural silence and solitude, wilderness does not exist.

EA page 9 recognizes that noise from helicopter supply flights, a generator, power tools, and battery operated hand tools could disrupt existing soundscapes. I doubt that the crew that built this Lookout in 1945 created these types of impacts.

Cumulative impacts are not realistically evaluated in the EA. Taken as a single project, the total duration of disturbance time and % of wilderness impacted may seem to be minor. However, this is only one project among many that use a helicopter. If a manager evaluates the impacts for each helicopter flight -- maintenance, research, chalet supply, and other administrative flights, one at a time, as has been done here, the impact is far less than what actually exists cumulatively. Add the helicopter use in this project to all of the other administrative flights, and the numerous daily commercial overflights, and one cannot escape the fact that the cumulative impact on wilderness is of very major significance.

The following example illustrates the absence of scientific analysis of cumulative effects: EA page 12 states that “disturbances to mountain goats from helicopter flights have been observed, but the nature of such disturbance appears to be very temporary.” This clearly isolates the disturbance event to a single flight, not the numerous daily flights to which goats in the Heavens Peak area are subjected by the commercial overflights. Yet there is no mention of cumulative effects. EA page 41 recognizes that “Periodic maintenance would add incremental disturbances to recommended wilderness over time . . .” However, there is no attempt to assess these long-term cumulative impacts.

And one other example of evaluation by single event rather than cumulative impact: EA page 56 states: “. . . on the days with the most flights (day 7 and 39) helicopters would be audible no more than 10 percent of the time. As a result, adverse impacts to natural soundscapes in the backcountry, rustic, day use, and visitor service zones in the affected area under the preferred alternative would be minor to moderate, adverse, short-term, site-specific, and local.” That is simply NPS jargon without logic.

In summary, the significance of the Heaven’s Peak Lookout Ruins pales in comparison with the importance of GNP’s wilderness integrity. As a means of resolving this conflict, I support constructing a Heavens Peak Lookout exhibit in one of the visitor centers.

Throughout the country, we are rapidly losing what little is left of real wilderness. Much of the chipping away comes from seemingly small intrusions like this building “restoration” project. The NPS has the opportunity to change course, reject this project, and demonstrate a dedication to protect true wilderness values.

Respectfully,

Riley McClelland