

First submitted (4/2016)

Open Letter to Congress and other decision makers,

Beginning the second hundred years of Glacier National Park, we are celebrating the unique guardianship Americans have entrusted to the National Park Service: to preserve and to protect our national treasures -- some of the nation's most natural, peaceful, beautiful and historic places -- while also ensuring a high-quality experience for visitors.

There is no better time to reflect on the challenges faced by our parks – especially those challenges that have a ready solution. We are answering the National Park Service “Call to Action.” We are asking you to join us.

Glacier National Park needs our help.

Glacier National Park has been under attack from serious pollutants for decades. The loss of glacial ice to global air pollution, for instance, is well documented. The assault by noise pollution has been flying under the radar and is contributing to the demise of Glacier Park's heritage of wild nature and resilience, protected for all people of the world to discover. Glacier's solitude has been shattered by hundreds of helicopter overflights, and the incessant noise pollution endured by wildlife and visitors is destroying what Glacier stands for – the pinnacle of natural beauty and tranquility. This is a noise issue, not an aviation issue. It only takes the clatter of one sightseeing helicopter to destroy a once-in-a-lifetime park experience for thousands of visitors.

This serious problem has continued to escalate despite passage of National Parks Air Tour Management Act of 2000. NPATMA has not been enforced and is losing the spirit of its intent – the cooperation of the FAA with NPS to “establish an air tour management plan for any national park or tribal land for which such a plan is not in effect.” “Such a plan may prohibit commercial air tour operations in whole or part.”

Seventeen years after the law was enacted, 18 years after scenic tour overflights were listed as a critical issue in Glacier National Park's General Management Plan, and 31 years after the problem in Glacier was identified as a priority at a Congressional Hearing (1987 Congress passed P.L. 100-91 and again in 1994 and 2002), we still have no peace in Glacier. Overflight tours overwhelm the natural experience in our Nation's only International Peace Park and World Heritage Site in the height of summer season.

Glacier National Park administration and staff, local residents, and visitors from across the country and around the world have long been concerned about noise pollution in Glacier. It is among the most common complaints lodged by travelers. Montana legislators introduced bills to address this issue more than 20 years ago, but to no effect. The issue also was thoroughly studied and vetted through the public process and a Record of Decision. Glacier National Park's General Management Plan, which determined the preferred alternative was to phase out and eliminate scenic tour overflights. This was the first step in a 2003-4 Air Tour Management Plan.

Glacier stands by their decision and is ready to put it in action with the cooperation of FAA Overflights Division as was intended by the law.

Glacier conducts administrative, rescue and fire-fighting helicopter use with great sensitivity. It is the commercial tours that are increasingly affecting a negative impact on the Park. Scenic helicopter overflights are an inappropriate use. Wildlife, the natural sound ecosystems they depend on and the majority of the visiting public subjected to the jarring noise, are adversely affected by the actions of an extreme few (in the last four years, less than half of one percent of visitors are affecting the enjoyment of the majority).

Helicopter overflights respect no boundaries. They invade even the most remote backcountry areas where visitors are offered outstanding opportunities for solitude and where natural quiet should predominate. Preserving the sanctity and quiet of special places is a priority of NPS. The Waterton-Glacier International Peace Park and World Heritage Site surely warrants our highest standard of respect and stewardship.

Visitors travel to Glacier seeking escape from the noise of modern life, not more of it.

In the public interest, and in the spirit of the Call to Action for the National Park Service we propose that helicopter overflights be discontinued per Glacier National Park's 1999 General Management Plan, and that helicopter scenic tours cease in this Wilderness National Park.

We are asking you to join us on behalf of Glacier National Park. We are asking, for the benefit of all present and future generations for the sanctity of its magnificent wilderness and wildlife, that you help put a stop to noise pollution and restore a Quiet! Glacier. We ask this in honor of the first hundred years of NPS' conservation and preservation for the public to enjoy and in hope for a quiet and peaceful Glacier National Park for the next 100 years.

Sincerely,

Mary T. McClelland

On behalf of millions of visitors who revere Glacier National Park
and

Friends for a Quiet! Glacier Coalition:

ACOUSTICAL SOCIETY OF AMERICA
ALLIANCE FOR THE WILD ROCKIES
AMERICAN PACKRAFTING ASSOCIATION
CENTER FOR BIOLOGICAL DIVERSITY
CONSERVATION CONGRESS
EARTHWISE PRODUCTIONS
FLATHEAD AUDUBON SOCIETY
FRIENDS OF THE WILD SWAN
GLACIER TWO MEDICINE ALLIANCE
GREAT OLD BROADS FOR WILDERNESS

GRINNELL FAMILY ASSOCIATION OF AMERICA
HEADWATERS MONTANA
LATINO OUTDOORS
LEAGUE OF WOMEN VOTERS OF ESTES PARK
LEAGUE OF WOMEN VOTERS OF MONTANA
MONTANA ECOSYSTEMS DEFENSE COUNCIL
MONTANA WILDERNESS ASSOCIATION
NATURE SOUNDS SOCIETY
NATIONAL PARK CONSERVATION ASSOCIATION
NORTH FORK PRESERVATION ASSOCIATION
ONE SQUARE INCH OF SILENCE FOUNDATION
RESTORE THE NORTH WOODS
SIERRA CLUB
S.P.E.C.I.E.S.
SWAN VIEW COALITION
WILD MOUNTAIN ECHOES
WILD SANCTUARY
WILDEARTH GUARDIANS
WILDERNESS WATCH
WILDWEST INSTITUTE
YELLOWSTONE SAFARI COMPANY

APPENDIX

ADMINISTRATIVE IMPASSE

The General Management Plan for Glacier National Park states:

The National Park Service will request that the Federal Aviation Administration prohibit all commercial scenic air tours over Glacier National Park. The Going-to-the-Sun Road will continue to provide access to interior portions of the park for all visitors, especially those unable to hike or ride horseback.

Drafted in 1999, this goal was to be achieved by:

- Requesting that the Federal Aviation Administration prohibit the operation of all new commercial scenic air tours over Glacier National Park; AND
- Developing an air tour management plan with the Federal Aviation Administration and the public that will include a phase-out of commercial air tour operations existing as of 1997.

As committed stewards, Glacier National Park's management has remained steadfast in their commitment to stop this noise pollution since 1999. Yet, Glacier's last six superintendents have been unable to protect the Park soundscape, though they have tried, and the very mystique and tranquility that visitors travel to experience, is the victim.

Twenty-three years ago Glacier National Park was listed as one of the "highest priority" Parks in the 1994 NPS Report to Congress on Overflights and the NPS' Congressional "Report on Effects

of Aircraft Overflights on the National Park System" (prepared pursuant to Public Law 100-91, The National Park Service Overflights Act of 1987, P.L. 100-91). In this Report to Congress, NPS emphasizes, "Maintaining or restoring natural quiet is an immediate priority" for Glacier National Park.

This report also lists 50 studies of adverse effects of aircraft overflights in National Parks. These same statements were repeated in 2002, at the Oversight Hearing on Air Tours and National Parks to the Senate Aviation Subcommittee of the Committee on Commerce, Science and Transportation.

How has this happened?

Beginning in the 1980's, Montana's Senator Max Baucus and Representative Pat Williams attempted to resolve this issue through legislation. They advocated tirelessly in Congress on Glacier's behalf. Glacier National Park's leadership acknowledged the importance of this issue in its General Management Plan (GMP, 1999). In 2000, the National Park Overflight Advisory Group (NPOAG) was formed to address Air Tour Management Plans, with a priority on the most critical and important parks. Glacier was identified as an "immediate priority" as far back as the Congressional hearings in 1987. For decades, GNP Superintendents have said they could do nothing, forced to yield authority to FAA jurisdiction.

The GMP states, "Of the public comments received on this issue, over 90 percent stated concerns about disturbance or the appropriateness of overflights." The noise pollution caused by scenic overflights, including adverse effects on wildlife and natural sound, were well documented in the plan and evidence is even stronger today. Preferred Alternative A was to prohibit all commercial sightseeing flights, and to develop a scenic air tour management plan with the FAA and the public that would include a phase-out of commercial operators (existing as of 1997).

The Record of Decision (ROD) addressed this by requiring that GNP request the FAA prohibit all commercial scenic air tours over the park and to develop a scenic Air Tour Management Plan (ATMP) as provided for and directed by law. Determination was supported by a sound study, EIS, and ROD. In 2000, ATMA was passed and signed into law—directing FAA to prepare an ATMP, with NPS participating as a 'cooperating' agency. The Act applied to commercial tour operators, including any over Glacier National Park or within one-half mile of the boundary of wilderness and tribal lands. There have been three subsequent sound studies (1994, 2004, 2014).

NPS is entrusted to protect this national treasure, while FAA promotes overflights that create noise pollution, and whose noise standards are governed by what is acceptable near airports, not over a wilderness national park. A handful of operators, with a fraction of tourists, fly with what was supposed to be a temporary permit (IOA), good until 18 months after the ATMP was in place.

NATURAL SOUND ASSAULT ON GLACIER NATIONAL PARK - On the Visitor

GNP's natural soundscape is under annual assault by sightseeing helicopter overflights and the inescapable din of noise pollution they create, even in the most remote wilderness reaches of the Park. This is a serious problem, with a small number of operators creating pollution that all visitors must endure. Less than one-quarter of one percent of visitors ruins the Glacier Park experience for the other 2 million visitors (2015 numbers). There were more than 500 helicopter overflights in Glacier during a single month last summer (2015 FAA numbers). It only takes one helicopter to destroy quiet, and to ruin the experience for thousands.

The irony in the NPS literature will not be lost on visitors who have saved money to take their families on vacation to Glacier. They will read the promotions that speak eloquently of the tranquility and the great wilderness escape. Then, they will stand on a trail or atop Logan Pass, or at the shore of a pristine lake amid the majestic Crown of the Continent, and they will listen to the racket and clamor of a helicopter scenic tour. It only takes the clatter of one sightseeing helicopter to destroy a once-in-a-lifetime park experience for thousands of visitors.

Glacier Park's overflight problems deal almost exclusively with helicopters – loud and pervasive engine noise and blade slap, disregard of altitude advisories, hovering, and seeking wildlife and backcountry spots (as advertised on their websites online).

The backcountry park users are especially impacted by commercial helicopter overflights, as these visitors are seeking the iconic wild lands experience. Solitude and wildness now are hard to find in much of Glacier, even though NPS has recommended more than 95 percent of the park for wilderness designation and seeks to manage it today as wilderness. The major and controllable factor responsible for loss of wildness is helicopter overflights.

Noise is the ultimate insult. It belittles us. It gives us nothing at which to strike back. It kills what is left of many things we have loved—music, beauty, friendship, hope, and excitement—and the reassurance of nature.” (A.G. Etter)

If you have ever sat on a mountain top and surveyed the country below, you must realize that what you saw was even more beautiful because of the awesome silence which surrounded you." ~ Karl Pruter (from NPS Power of Sound Interpretive Handbook)

NATURAL SOUND ASSAULT ON GLACIER NATIONAL PARK - On Wildlife & Wilderness
In 2002 -- during Oversight Hearing on Air Tours and National Parks to the Senate Aviation Subcommittee of the Committee on Commerce, Science and Transportation testimony -- the committee was reminded that “since its establishment, Glacier has been a symbol of wild land values: the sounds and fragrances of Nature among magnificent peaks, lakes, creeks, and a unique flora and fauna. The NPS has characterized Park wilderness, exemplified by Glacier, as ‘solitude, and the music of stillness.’”

National Parks are under increasing noise pressure. Noise levels in park transportation corridors today are at 1,000 times the natural level. Additionally, the sounds of vehicular traffic have a much larger “footprint” than the concrete surface. Road noise impacts on wildlife have been shown to extend over a mile into the forest [4]. Air transportation, as well, can affect life on the ground. Sound levels during peak periods in a high air traffic corridor in the Yellowstone backcountry, for example, were elevated by up to 5 decibels. The result is as much as a 70% reduction in the size of area in which predators can hear their prey (p 11 NPS Sound Interpretive Handbook taken from (Barber, J. R., Frstrup, K. M., Brown, C. L., Hardy, A. R., Angeloni, L. M., & Crooks, K. R. (2009). Conserving the wild life therein: Protecting park fauna from anthropogenic noise. *Park Science*, 26(3), 26–31)

Wild Soundscapes, a book inspired by the NPS, 2003, states NPS policy on noise—“the natural soundscapes, along with land and wildlife...are considered a resource in need of protection.” (Krause)

THE OPERATORS

Scenic tours are the only commercial use of National Parks not regulated by NPS, yet they profit off of the destruction of the peace and quiet that visitors seek in the National Park. Comments and complaints to the Park include not just noise, but annoyance and anger toward flights that buzz hikers at the top of a mountain, fly below the requisite altitude, and haze wildlife. Most pilots are respectful and knowledgeable about the Park, but they do not control the jarring noise their machines make. They must provide ear protection for their riders.

SAFETY

Overflights in Glacier National Park are not only intrusive -- they also are unsafe. Helicopters have only one engine and are not meant to be carrying customers in an air taxi. FAR Regulation Part 91 and FAR Part 135 are serious concerns, especially in light of the 2016 helicopter crash near Great Smokey Mountain National Park, where 5 tourists were killed. A current Federal Register document states that the increased bird strikes in rotorcraft is a serious safety concern, increasing the risk of fatalities. Glacier National Park is a major migratory path for many important birds. Not only are they at risk, but helicopter passengers are as well. The majority of the helicopter tours (89% as of 2015) take off and land from private helipads, with no security.

PARK ACCESSIBILITY

Some argue that people have a right to see Glacier by air. Yet, Glacier is one of the few parks where a modern highway -- the Going to the Sun Road corridor -- makes available trails and high-elevation alpine views of much of the park. Anyone who can get into a car or a bus or a boat can see Glacier; anyone who can't access those options won't be able to get into a helicopter, either. In fact, most of the comments on line from overflight customers, speak of how they have the good fortune to be able to pay for a view most visitors never get to see. If one is truly interested in making aerial views of Glacier National Park available to everyone, then why not commission a videographer to fly over the park once and make an aerial movie

that could be narrated, filled with music (not the cracking blades of a helicopter, and disturbing no one's experience) to be shown in the theatres of the visitor centers?

INAPPROPRIATE USE

NPS policy states that an activity is appropriate only if it: 1) results in no impairment of natural or scenic values; 2) does not itself become a primary attraction, and 3) does not lessen the opportunity for others to enjoy the park.

Helicopter overflights are an inappropriate use, unless they are for rescue, research or necessary park administration (in addition to the commercial sightseeing tours, GNP allows itself 50 flights for these purposes annually).

THE IMPORTANCE OF NATURAL SOUNDS

The Problem? In the National Parks publication (2009 Special Issue on Soundscapes), the introduction states: "Noise exposure can also significantly detract from the experience of visiting a national park. For example, significant decreases in scenic evaluations have been reported in association with the presence of anthropogenic sounds (Benfield et al. 2009, 2010)."

The Solution? "Research has also begun to explore the restorative effects of natural environments, including the sounds of nature" (Anderson et al. 1993; Tarrant et al. 1995). For example, people who have been exposed to cognitive fatigue reported higher positive emotional states and performed better on mental tasks after walking in a park, and these restorative effects were higher than for other treatments, such as walking in an urban area, reading, and listening to music (Hartig et al. 2003). Increased noise levels can also reduce the distance and area over which wildlife can detect changes in sounds. Research now indicates that human noise intrusions can produce substantial changes in wildlife behavior, breeding, and species success (Rabin et al. 2006)..."

Though the topic of noise was first addressed in the 1978 edition of NPS Management Policies (and later updated in 1988), the 2001 policies revision devoted an entire section to the protection of the acoustic environment as a resource just like air, water, and wildlife (National Park Service [NPS] 2001, section 4.9). Chapter 8 on "Visitor Use" also describes the importance of the acoustic environment to visitor enjoyment and states that recreation, including motorized recreation, cannot intrude on the opportunity to hear the sounds of nature in units of the National Park System or interfere with park interpretive talks. In 2000, Director's Order 47 (NPS 2000) was promulgated as a precursor to the pending management policies and further "requires, to the fullest extent practicable, the protection, maintenance, or restoration of the natural sound- scape resource in a condition unimpaired by inappropriate or excessive noise sources."

The Power of Sound – NPS Natural Sounds and Night Skies Division Interpretive Handbook in its opening paragraph states:

Natural and cultural sounds awaken the sense of awe that connects us to the splendor of national parks and have a powerful effect on our emotions, attitudes, and memories. NPS Natural Sounds & Night Skies division bases their philosophy of quiet on 'sound' science that supports quiet to sustain ecosystems, wildlife survival in wilderness parks and quiet for the optimum visitor experience in all parks (see Inside Science - Reducing Noise in National Parks).

SACRED LANDS

Glacier is filled with and surrounded by wilderness. Sacred tribal lands of the Blackfoot Nation share mountain peaks on the east side of the Continental Divide, yet there is no place in Glacier to escape the thwapping of the helicopter overhead. Noise pollution knows no boundary and Glacier, her Blackfoot Nation neighbors, visitors, wildlife and the mystique of natural sound are the victims of this paradox.

FUTURE GENERATIONS

We are losing our iconic glaciers, and in a matter of decades they will be gone. But with the increasing noise pollution, Glacier already has lost its very nature. The national parks are full of natural sounds and silences that belong to all of us. We all have the right to hear and experience the natural soundscape. We say the national parks are preserved for future generations, yet the 20-year-old of today grew up never knowing the natural sounds in Glacier.

The Glacier National Park GENERAL MANAGEMENT PLAN on SCENIC AIR TOURS

The National park Service will request that the FAA prohibit all commercial sightseeing tours over the park. A scenic air tour management plan will be developed if provided for and directed by law.

The preferred alternative was selected because it notifies the FAA and the public that the NPS intends to work towards prohibiting all commercial sightseeing flights over the park. Glacier's enabling legislation requires the NPS to regulate activities in such a way as to "preserve a state of nature" while balancing visitor use. The visitor experience is diminished by scenic air tours continuing to operate in backcountry areas where peace and solitude have high value for visitors. Glacier's peacefulness and tranquility were cited in the designation of an "International Peace Park" in the area in 1932. The park's solitude and tranquility were also recognized in its 1974 wilderness recommendation to Congress. The NPS believes that visitors to Glacier National Park's backcountry should have the opportunity to experience Glacier's peacefulness and solitude without disruption by scenic air tours. This action applies only to scenic air tours and not to restrict private aircraft or commercial aircraft flying over the park. The other alternative (Limit Scenic Air Tours Over the Park) was not selected because of overwhelming public support to ban scenic air tours. It also wasn't selected because designating corridors over the park would result in having flights over more populated areas of the park, thus impacting most visitors to Glacier, or having flights over the backcountry, thus impacting those visitors who had worked the hardest to find peace, solitude and tranquility. Inasmuch as the Going-to-the-Sun road was developed six decades ago to allow access to the park's interior and designed

in such a way as to provide for scenic viewing in the park's back country for all visitors, it was felt the intrusiveness of scenic air tours was not an appropriate use for Glacier.

As long ago as 1957, an NPS document entitled "The National Park Wilderness" clearly stated appropriate uses in a place like Glacier National Park:

Some strange proposals find their way to the National Park Service, often suggesting activities completely inappropriate to the best use of the parks...for instance; we can find requests for...helicopter sightseeing service.... The National Park Service immediately rejects such proposals, and it requires no rare understanding of park objectives to make the decisions.