

Glacier Park Collective  
P.O. Box 4314  
Whitefish, MT 59937

2-7-2022

Glacier National Park  
Park Headquarters  
PO Box 1  
West Glacier, MT 59936

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To Kate Hammond (current Glacier National Park (GNP) Superintendent,) Pete Webster (acting deputy superintendent,) & Justin Racioppi (GNP District Fee and Permit Specialist);

Below are concerns of local photographers, planners, officiants, brides, grooms, and local business owners over the most recent restrictions of Special Use Permits (SUPs).

We thank you for scheduling a meeting with us to discuss the most recent 2021 & 2022 SUPs changes. This is our written appeal to the park for your review, prior to our meeting:

### **Our Appeals**

1. Timely Permit Processing
2. To Remove Required Permitting of Vow Exchanges
3. Restore Original Ceremony Location & Time Restrictions, & General Public Privileges
4. Provide Clear, Not Vague Written Rules & Regulations
5. Remove Third Party Vendors From Being Listed on SUPs

### **Who We Are**

We love our National Parks and as Montanans, we hold a special endearment for Glacier National Park. This is not only where we live and work, but where we recreate, raise our families, contribute to our community and support the mission of preserving Glacier for future generations. This is not a temporary station or vacation for us. This is our home and we are committed to protecting it while preserving access, without discrimination, to the public. As local small business owners, we are advocates for Glacier and are often our clients first and strongest source of information regarding conservation, outdoor recreational ethics and Park policy. It has been our hope to work alongside Park officials for the betterment of Glacier and the "benefit and enjoyment of the People."

We regard, respect and love this splendid place and feel that we have much to offer by way of alternate perspectives, ideas and insight that would be an asset to the Park as you traverse this newly discovered Glacier. As persons who luckily get to spend a considerable amount of time in Glacier, we witness firsthand a multitude of issues plaguing the Park and are often the eyes, ears and voices that call attention to the problems and violations we see that jeopardize the integrity of Glacier as a whole. We fully understand that the growing interest in the Park comes with many ramifications and we are eager to discuss ideas and solutions with you that protect the lands and also the peoples rights to access and enjoy those lands.

### **Our Concern**

The sudden, all encompassing and unreasonable changes made to the guidelines for ceremonies in Glacier Park as well as the SUP process is alarming at best and unjust at worst. We understand that, our once quiet and undiscovered Glacier Park, is now experiencing unprecedented visitor numbers and that Park officials are scrambling to manage these ever changing times while implementing procedures and

policies meant to protect the Park and preserve the visitor experience. However, we also feel that somehow in this process, wedding ceremonies have been erroneously targeted as a major source of Glacier's issues resulting in excess and prejudicial blame, as well as overreaching restrictions that severely limit and impact the visitor experience. Our clients are also members of the public who want to experience Glacier Park in a special and meaningful way. Throughout this process, there is also a growing concern that wedding professionals have been specifically targeted and discriminated against by the Park/SUP office. Vague, murky, ever-changing rules, threats of fines and court summons, disrupted shooting events, confusion and fear colored most of 2021 and 2022 is looking even more disconcerting and ambiguous. Please read our appeals to GNP in the following details to hear our frustrations and our solutions.

## **Appeals Detailed**

### **APPEAL #1. TIMELY PERMIT PROCESSING**

#### **Background:**

- Prior to 2021, SUPs were processed in a timely & reasonable manner, within 2-4 weeks on average. There was never a problem, even though they had more permit applications come in during covid times of 2020.
- Currently there have been SUP applications outstanding for over 7 months with limited to no communication with permittees.

#### **Solution:**

- We are asking for:
  - an organized system as it was prior to 2021 with reasonable processing times
  - estimated processing times communicated in receipt of the permit application
  - a written policy with an included reasonable time frame for the processing of SUPs

### **Appeal #2. TO REMOVE REQUIRED PERMITTING OF VOW EXCHANGES**

#### **Background:**

- Prior to 2021, vow exchanges did not require a permit in GNP. In midsummer of 2021 the park permitting office, suddenly and seemingly, required Special Use Permits for vow exchanges. This was, however, not clearly articulated nor officially announced. Rather, various photographers were told vague and conflicting information over phone calls and through email correspondence with the permit office. It should be noted that, historically, most of these vow exchanges were shared between just two people who were not getting legally married within the Park, and with their photographer in tow. With this knowledge, the park permitting office has now expanded that definition to include the "saying of words." (per Andrea Schwagerl's email on 1/5/2022 - Visitor & Resource Protection Assistant).
- In summer of 2021, a few photographers discussed this unsettling and overreaching change during a face to face meeting with then acting supervisor, Pete Webster. Mr. Webster agreed that a permit for this activity would be a violation of the first amendment and one could not monitor a person saying "sweet nothings to their spouse." Acting Supervisor Webster also assured those photographers they would be a part of the discussion for 2022 changes.

- The permit office clarified they believe a permit is necessary even when the activity “does NOT (emphasis added) disrupt other visitors” (Source: A. Schwagerl email dated 1/5/2022) and one could argue this activity is no more disruptive than a couple eating a sandwich together, taking a photo for their social media account, or discussing the weather. No clear justification was given as to why these “vow exchanges” would suddenly need a permit.

**Our Argument:**

- We staunchly contend that vow exchanges do not negatively impact the public’s enjoyment of the Park, in fact most visitors appear absolutely thrilled to witness these brief events. Nor do they pose any more of an impact on conservation than the droves of tourists that frequent the same locations every day. Requiring SUPs for vow exchanges is not only an extreme measure that yields excess and unnecessary work for an already overtaxed permit office, but the Park Service does not and should not have control over what is said on public lands per the First Amendment of the U.S. Constitution.

**Proposed solution:**

- As is the case with filming in GNP, SUPs should be based on group size, and not based on activity. From GNP’s [Permit & Reservations](#) site: “Low-impact filming’ is defined as outdoor filming activities in areas open to the public, except areas managed as wilderness, involving **five people or less** (*emphasis added*) and equipment that will be carried at all times, except for small tripods used to hold cameras. Those participating in low-impact filming activities do not need a permit and are not required to contact the park in advance. If low-impact filmmakers have questions about areas where they want to film, they should contact the park directly.

**APPEAL #3. RESTORE ORIGINAL CEREMONY LOCATIONS & TIMES RESTRICTIONS, & GENERAL PUBLIC PRIVILEGES**

**Background:**

- Per new 2021 & 2022 SUP regulations, The SUP Office has cited conservation, overflow/congestion and the disruption of other visitors as cause for these radical changes, when instead, the new permit limitations are forcing ceremonies into the most congested areas of Glacier Park during the busiest times of the day and year.

**Our Argument:**

- **2022 Changes:**
  - Many handicap accessible locations were removed or severely limited dates available only between Memorial Day-September 30th
    - Running Eagle Falls (removed completely)
    - Big Bend (removed completely)
    - Two Medicine Campground Group Site (severely limited)
    - Two Medicine Campground Amphitheater (severely limited)
    - St. Mary Amphitheater (severely limited)
    - Rising Sun Amphitheater (severely limited)
    - Many Glacier Hotel Deck (severely limited)
    - Many Glacier CG Amphitheater (severely limited)

- “No food or beverages” was added to equipment restrictions at locations where the general public is permitted to have food & beverages.
- Permits capped to 2 per day at several locations
- St. Mary’s Lakeshore, Sun Point, 1913 Ranger Station, Red Eagle Trailhead - no longer allowing permits issued after 4pm (latest permit issued for 2pm start)
  - After 4pm is a much less congested time of day, making it the better time to make available)

**Requested Changes:**

- Discuss recent permit caps of 2 per day.
  - Prior to 2022 there were never limits of how many weddings could take place per location. However with the new 2 hour permit time limit, which we are in agreement with, allows spacing between ceremonies held. This is an area we would love to discuss with the Park further to understand their burden and our perspective.
- Are workshops included in the total number of SUP permit numbers processed
- Remove “no food or beverages” and restore general public rights to SUP holders.
- Triple Divide (St. Mary’s) District
  - Allow SUPs in May & October
  - Allow permits past 4pm
  - Remove Limit of 2 permits per day
- Two Medicine/Walton District
  - Allow SUPs in May & October
  - Remove Limit of 2 permits per day
    - Running Eagle Falls
      - Allow ceremonies at this location as has been prior to 2022.
      - Allow up to 8 participants
- Big Bend
  - Allow up to 8 participants as has been prior to 2022.
  - Allowable on established trails as has been prior to 2021.
- Chief Mountain (Many Glacier) District
  - Allow in May & October
- Cutbank: field area south of trailhead
  - Allow ceremonies at this location as has been prior to 2022.
- Lake McDonald District
  - Ryan’s Beach/ Meadow
    - Allow ceremonies at the Meadow as has been prior to 2022
    - Remove Limit of 2 permits per day

**Appeal #4. CLEAR, NOT VAGUE WRITTEN RULES & REGULATIONS**

**Background:**

- The permit office has said that they do not have written rules & regulations for all to follow, instead there are a lot of gray areas.
- These newly implemented (2021 & 2022) rules & regulations that GNP is enforcing do not accord with the U.S. Constitution, promoting the general welfare and domestic

tranquility, they violate freedom of speech in Article 1 of our Bill of Rights and laws against vagueness outlined in Amendments V and XIV.

**Specific Vague Policies:**

- “Event” needs clarification. Within the new “Wedding Locations in Glacier National Park” guide, it states “no **event** or ceremony can take place at any location not listed here at any time”;
- See Vow Exchanges vague policies in Appeal #2;
- Food & beverages not allowed at specific permitted locations.

**Proposed solution:**

- The SUP policy’s need to be set forth very clearly and with no vagueness, with clearly written regulations/rules/policies that are in accordance with the U.S. Constitution.

**APPEAL #5. REMOVE 3RD PARTY VENDORS FROM BEING LISTED ON SUPs**

**Background:**

- Prior to 2021 third party vendors were not listed on SUPs.

**Our Argument:**

- Third party vendors should not be listed on SUPs. We ask:
  - Why are third party vendors now required to be listed on a permit application when the application is a legal contract between GNP and the applicant?
  - How can any third party vendor, namely but not limited to the photographer, be held liable for the actions and behaviors of the applicant and/or their guests?
- How can any vendor be bound by a contract that they neither applied for nor signed? It has been stated by email that photographers have only been informed of the SUP changes as a “courtesy,” while at the same time, photographers have been threatened with penalties and told they would be held accountable for violations committed by permit applicants. Not only is this unlawful, but also opens the door for bias and blatant discrimination against vendors and their clients during the permit process.

**Our Solution:**

- We implore GNP permitting office to acknowledge in written policy that only permit applicants/signers maintain accountability and liability; and to stop the discrimination against third party vendors, namely photographers & planners.

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**Summary:**

We urge the Park to reexamine their perspective on ceremonies as a whole and we beseech the permit office to acknowledge our arguments and reevaluate and rework these most recent ceremony changes, lift the unconstitutional vow exchange permit requirement, and implement common sense procedures. We are also seeking clarity of rules, peaceful, timely and unbiased permit processes and mutual respect moving forward.

Let us remember the words by founder President Theodore Roosevelt that our National Parks are “For the Benefit & Enjoyment of the People” & President Franklin D. Roosevelt: “There is nothing so American as our national parks.... The fundamental idea behind the parks...is that the country belongs to the people, that it is in process of making for the enrichment of the lives of all of us.” - *Radio Address from Two Medicine Chalet, Glacier National Park (August 5, 1934)*

We can balance the enjoyment of the land with the preservation of it for future generations. These new restrictions do neither.