

May 6, 2022

Dear Mr. Stewart,

I am a 39 year Juneau resident who lived two miles from the Mendenhall Glacier Visitor's Center (and approximately 1 mile from the Dredge Lakes area) for 30 years. My husband and I never tired of the extensive year round recreation opportunities at MCRA. While raising our three (now adult) sons, we considered the MGRA our backyard and visited it very frequently. Our family's activities included, and continue to include:

- year round hiking and walking trails throughout the area, including ice cave exploring in winter
- cross country skiing on trails, the campground, and the frozen lake (including interactions with Romeo, the black wolf)
- sledding on hills near the current pavilion
- canoeing on Mendenhall Lake
- picnicking and swimming in Mendenhall Lake
- camping at the campground
- picnics and special gatherings at Skater's cabin
- school field trips to the Visitor's Center and special trips to study exhibits for school projects
- educational programs and Fireside Chats in the Visitor's Center
- community events and a wedding in the Glacier Visitor's Center
- bird watching
- mountain goat, porcupine, and squirrel observation
- bear and salmon viewing
- winter animal tracking
- ice skating in the Dredge Lakes area and Skater's cabin
- bike riding around the Dredge Lakes area, along the trail of time, and on the Glacier Spur Road
- collecting ice to make home made ice cream for friends visiting from out of town
- family photo shoots for Christmas cards
- gift shop visits/purchases
- sharing the MGRA with our out of town guests (including "Flat Stanley")
- our 16 yr old son's first job as an assistant interpreter at the Glacier (Youth Conservation Corp)

In short, MGRA is a very special place that we have enjoyed for all of its offerings for nearly four decades. For the past few years, I have personally visited MGRA at least 12 times per year.

I have studied the proposals for development, attended the public open house on-site and a presentation online. I attended several meetings with concerned friends, including one meeting attended by three USDA officials who are very involved with the project. I have studied the documents and reviewed many of the public comments. I am greatly concerned about the scale of development that is proposed, especially because it does not seem well thought out – I believe the environmental and operational impacts will be much greater than articulated in the draft EIS. Mostly, I fear that in an effort to provide more access to the beautiful and unique MGRA to more people, the very things that people want to see will be destroyed.

If it is necessary to choose one of the four alternatives, at this time, I would choose #1 – Do Nothing. While I believe that the current facilities are insufficient for current visitor loads, there are fundamental aspects to each of the three development alternatives that I feel are destructive and counter-productive to the stated vision and mission of the Master Plan:

VISION: “The Mendenhall Glacier Recreation Area will continue to provide recreation experiences that highlight the natural, historic, and cultural resources to local, national, and international visitors.”

MISSION: “To continue to provide sustainable recreation experiences that interpret glacial features in a changing environment.”

Recognizing that existing facilities are strained to accommodate current visitor loads, I offer the comments and concerns that follow on components of the three development options, and in essence, create Alternative #5: limit the number of visitors and limit the amount of human made structures.

My general preference for development is to first control the number of visitors (both per day and per season), and schedule at least 1 day per week during the summer season that cruise ship visitors are not able to book visits as part of their cruise package. This day-off would provide a less intense day for independent travelers (this could include cruise passengers who want to take it upon themselves to get to MGRA – not part of a tour group) and locals. By spreading out the visitor load and/or reducing it, repairs, upgrades, and modest sustainable improvements to existing facilities could be sufficient for the foreseeable future. I realize that limiting visitors will be a new operational model for the Forest Service, but I think it should be considered as part of a responsible development alternative that reduces the impact on the environment and preserves the area for sustainable recreation experiences.

One of the things that struck me the most about the three proposed development alternatives was the significant amount of human built structures (buildings, bridges, parking lots, docks, paved trails, etc.). I strongly feel that the extensive amount of human forms on the glacier landscape will overload the place and destroy the current natural glacial recession wilderness. There needs to be a deliberate effort to construct as little as possible; construct only what is essential, then construct those things in the most gentle and unobtrusive ways possible to keep as light a touch as possible on the natural landscape. This means blending in with nature – not competing with it or dominating it. For example, pave trails only when high human loads or erosion warrant such. Use open paving materials that encourage natural drainage. And really study the intended use of the trails to make them safe and adequate rather than ‘over the top’ to accommodate any imaginable desire.

Welcome Center:

The 2019 Master Plan located the Welcome Center into the existing rock area that currently provides accessible ramp access to the historic Visitor Center. I received a verbal explanation from the project architect as to why the location changed. To summarize, it was costly and did not let the historic building stand as its own entity. It’s also my observation that building in the rock hillside would require a lot of human impact to blast into the beautiful striated glacial rock, which would be inconsistent with a “light human touch” approach. The change in location was not explained in the EIS draft or in any of the documents I reviewed. I can understand the concerns that were expressed by project leaders, even though the historic Visitor Center is not in its original architectural form. The bigger concern to me was the lack of justification for the only site (according to the architect) that was evaluated after it was determined that the site called for in the Master Plan was not feasible. It does not appear that a site selection process was undertaken that would thoroughly evaluate the functions of the Welcome Center and find one or more alternatives to address the needed facility functions. This violates the concept of studied alternatives in the EIS program.

There is only one proposed location for the Welcome Center and it is in the premiere arrival view plane. This in itself makes it a non-starter option to me. I support the concept of a Welcome Center as one of the highest needs of MGRA if anything besides Option 1 is to be undertaken. Welcome Centers are effective gathering places in many parks across the county, especially those that have a large amount of visitors

who are unfamiliar with the place. The purpose of a Welcome Center is to transfer from ground transportation to arrival at the place (get off the bus), get oriented to the offerings of the place, and use restrooms. These are different human activities than the “ah ha’s” of actually seeing the glacier. Separating the activities of ‘welcoming’ from the real reason that visitors come is an effective management tool: “Here’s your map; use the restroom; then walk (or ride on an electric golf cart or similar small, unobtrusive vehicle only for people who are unable to walk) a short distance to go see the glacier.” Conversely, “before you get back on the bus, use the restroom, recycle your map, and go buy a t-shirt in the gift shop.” This approach keeps the Welcome Center from being the attraction. This means it does not belong in a location that is close to the premiere experience view. Rather, it needs to be in a location that does not visually block views to the lake and glacier, and allows buses to easily maneuver - like the current large parking lot with the snow storage mountain, an area already impacted by human development. I believe this area is referred to as the Day Use Parking Area in Alternatives 2, 3, and 4. The authentic visitor experience begins as a person walks **out** of the Welcome Center, and into the salmon/bear viewing areas, lake edges, Photo Point, Nugget Falls, then makes a final stop at the historic Visitor Center before heading back toward the bus. The experience is not about the human-made Welcome Center. It is about getting them into the MGRA for authentic experiences. A location away from the main attraction will also mean fewer visual and noise impacts to visitors’ experiences due to deliveries, supplies, garbage pick-up, and day-to-day operations (eg. offices) that are not directly related to the visitor experiences.

As for the size and configuration of the Welcome Center, it should be sized to serve the essential needs, which do not include food service. I agree with the many comments that food is inappropriate to this setting. Some people have nostalgic thoughts about the days of pie and coffee (even though many of those voicing such thoughts never actually experienced them). As an avid pie baker, I know that pies are very costly and time consuming to prepare. It is simply not feasible to have a quaint café to serve today’s crowds. The food will be institutional pre-made style, and it will be expensive, just like all the national parks, Smithsonian museums, Disneyland, etc. People have been well trained to follow the current policy of no food at MGRA because of the danger it poses to wildlife. Food service will invite back all of the bad behaviors that current messaging has effectively erased. Why would you possibly undo the last two decades of hard important work?! There should be a drinking fountain in the Welcome Center, as well as a water bottle filling station and water bottles for sale in the gift shop. There should be a private resting lounge for people with diabetic or other medical conditions that come up during their visit, and this place should include a pantry of appropriate non-perishable food items for emergencies. The resting lounge should also be a place where people with medical emergencies can wait for help to arrive. Under the current proposal, do you really want an ambulance rushing up to the highly visible Welcome Center? It would be just one more added disruption to the pristine experience people are seeking.

If it is truly feasible to use the Welcome Center for community events in the off-season, then I would support a modest kitchenette for very limited catered food handling (while the bears hibernate). A residential sized sink, and a few outlets to plug in warming trays would be sufficient. But the first question should be, “Are we really going to make this space available during the off-season, or is it cost prohibitive, requiring that we lock it up throughout the winter?” The architectural poster illustrations that show both the historic Visitor Center and the Welcome Center beautifully lit up in the winter darkness are misleading – the historic Visitor Center has always had very limited winter hours due to lack of funding. I sincerely doubt that both buildings will ever operate simultaneously in the winter. Pick the one that will really be used, and make it adequate for modestly catered events. Removing the food service space from the Welcome Center will reduce the overall size, which contributes to minimizing the project’s impact on the environment.

Trails and Parking at Trail Heads: I support the idea of better maintaining and improving some of the trails, not only for locals, but also for independent travelers and small commercial tour groups. Walking

the easy trails at MGRA and other locations in Juneau is one of my greatest life pleasures as I age. I walk and hike nearly every day. I think many travelers enjoy walking experiences, too. Just this week, I met a cruise ship couple from Vancouver, BC who were walking the downtown Flume Trail (in the rain) because they enjoy walking when they travel. Carefully improving some of the trails to take stress off popular visitor photo-op areas is a good idea. The three proposed trail heads (same in each Alternative) also seem like a good idea to me if they are done sensitively with appropriate materials, sized according to actual need, and inclusive of amenities like trash receptacles. I agree that there are safety problems related to lack of dedicated parking areas, and the lack of trash receptacles, including dog poop bags, that make modest development appropriate.

I generally favor the trail concept in Alternative 4 in the area of the lake that pulls the trail inland while allowing access points via trail spurs, and uses gravel rather than pavement. Developing a trail along the lakeshore has a highly negative impact to the environment – again, the idea of human development being more important than the natural condition, and without consideration to noise and types of activities that occur on beaches versus woodland trails. I'm concerned about the 8' elevated pile portions of the Lakeshore Trail in Alternative 4 and would prefer to see the trail avoid known flood areas if possible. Any proposed trail work should consider first existing flora and fauna and should not be done if the impacts are significant. I do not support 14 ft wide trails to allow ski trail grooming by snow machine. Trails that are less wide can still be used for skiing - in fact, existing informal trails are already skied by myself and many others. The minimum necessary width should be studied (I think it is probably 6-8 feet in width) along with specific areas needed for skiing to determine which trails would benefit from widening, and which should remain more natural. This comment applies to both the Lakeshore Trail system and the Dredge Lakes trail areas, and may also be applicable to the Trail of Time.

I support making modest improvements to existing Dredge Lakes area trails to improve drainage and erosion - something in between Alternatives 3 and 4. I'm not opposed to commercial group walking tours in the Dredge Lakes area, but groups should be limited in size (perhaps no more than 6-8) so as to balance with independent users. The capacity should be much less than the stated 77,040. My gut says that limiting the commercial capacity to around 20,000 might work, but I would want to explore the details of this. Although I've never been a dog owner, I feel that dogs should continue to be allowed in the Dredge Lakes area, in part, to notify their people of bears. I do not support commercial mountain biking tours in this area. The conflicts with walkers would be significant, especially because the bikers would not be familiar with the trails.

I agree that the existing Nugget Falls trail is insufficient in width. Providing a loop or widening the existing trail both seem like viable options to consider. The key is studying the options to determine which has less impact on the environment, including constructability issues. Minimize the human impact on the land.

In the West Glacier trail system, I support the minimum work needed to improve safety, especially with respect to erosion and drainage control. This hiking area is, and will continue to be used by only a very small percentage of visitors, and will continue to be used by locals. It should be left in its natural state as much as possible because that is the authentic hiking experience desired by people who choose this area.

Improvements to the Trail of Time should be modest and cross-country ski considerations may be applicable for portions of this trail. The proposed Dipper Falls viewing area generally sounds like a good idea to me in that it will address current damage caused by lack of a development plan. However, this should be done with a light touch. Is a raised trail really necessary if the Steep Creek area is improved for capacity? Do all areas of the spur trail need to be raised, or can it follow the natural ground and still be safe from bear interactions? Detail study should be done before including this elevated spur trail in the bear/fish viewing experience.

The Steep Creek Trail area seems like a good natural habitat to sacrifice for the purposes of the visitor industry. It is mostly an already disturbed area, and it offers the things that many people come to see in their short time visiting MGRA – bears and fish. My opinion, as a local, is that the existing area has been effectively managed given the intense usage of cruise ship visitors that dump into the area. As for the specific details of how to build, where to put viewing platforms, etc. my comment is that all of the infrastructure (and the idea of re-routing Steep Creek and filling Zig-Zag pond) needs to be grounded in science. If the fisheries biologists and habitat specialist say it's a good idea, then I agree. If they say that fill and re-routing will negatively compromise the fish, bears, and all the other plant/animal species that are dependent on to those (including humans), then I do not support changes. A healthy ecosystem is the highest priority.

Campground: I support the construction of small cabins and one larger cabin for a summer season caretaker that could be rented by groups in the winter. The area is already disturbed by humans, and I think the cabins could contribute to an valuable MGRA experience for many people (both visitors and locals) year round.

I'm concerned about, and generally do not support, constructing a bridge across the Mendenhall River from the campground area to the Lakeshore trail system. It will need to be engineered as a substantial bridge due to the river's characteristics, and as such, will violate the fundamental approach that I advocate – a light touch that minimizes human impacts on the land. There are management advantages to keeping the West side separate from the more populated areas - disbursing people over multiple areas with the West side being less intensely used. The need for a connection for winter skiing is not warranted in my opinion, even though I am an active winter skier in this area. Although there are many letters of support from locals for more ski trails, there is not a true analysis of impacts for various trails nor is there substantive justification for MCRA to carry the community burden of the desire for some skiers to have more trails. I don't find any documentation that provides justification of need. Also, there are already many other good opportunities for skiing proposed in the Alternatives without a connecting bridge. I am open to reviewing the details of a proposed bridge, though. If it can be shown to be of minimal visual and environmental impact and is really necessary for safe recreation and wilderness habitat protection, then I would be open to reconsidering my current position. The evidence of need has not been presented in the DEIS or other project documents.

Motorized Boats and Docks: No! Simply, No! There are huge environmental impacts to introducing motorized boats into the MGRA that are not discussed in the DEIS documents. Similar to the pie and coffee idea, the project planners seem to have this idyllic image of a personal experience gently crossing the lake to get closer to the ice, even though we all know that the ice is retreating and will likely be out of the lake before any of the proposed improvements get funded or built. The reality is that if the boats are there, the visitors will use them – in droves. And they will want more. There will be long lines on both ends of the boat tours. There will be many boats crossing back and forth many times per day for 7 months each year. It will become a Disneyland experience – not an authentic National Forest experience. It will be noisy (from people gathered together and the boats themselves), could smell bad if diesel/gas engines are used, and will cause increased activity that could negatively affect wildlife and damage habitat, not to mention disrupt other visitors' attempts to have an authentic experience.

There are safety issues for visitors, such as collisions with ice, and people who are not dressed properly getting wet and cold. I found no suggested facilities or protocols for emergencies in the documentation. What happens when a boat has mechanical problems? What if it is damaged by ice and takes on water? And how do these motorized boats affect the canoes and kayaks already using the lake? There are wakes from motorized boats and the presence of hundreds of people at a time crossing the lake that will diminish the experiences of non-motorized boats already being used in responsible ways. And what about the

message that we have heard from the Forest Service for decades - the same one we teach our children? "The lake and ice are dangerous. Do NOT go close to floating ice and only play in the water in very shallow areas under adult supervision." It is irresponsible for these proposals to violate the basic safety considerations that have been in place for decades at MGRA and consistent with everything we know about interacting with Juneau's wilderness.

Docks are another example of unnecessary human built forms on the landscape. Currently, canoes, kayaks, and rafts access the lake from the West side in safe ways that have virtually no impact on the land or the experience of others. Without motorized boats, there is no need for docks, and no need for the eyesore of the floating portions being stacked for storage during the winter. Alternative 3 indicates that commercial use of the unit, including non-motorized boats would raise to 249,000 people. The current capacity is noted as 150,552. The current commercial usage of 55,000 service days feels adequate from my local perspective, however I am not clear about how much of this capacity is currently being used. To date, I have not experienced negative impacts from capacity or commercial usage while I have used the West side. I oppose increasing the capacity and commercial use to levels that reflect the overall proposed increases of these development plans.

I oppose constructing concrete boat launches including locked gates as proposed in Alternatives 2 and 3. These are unnecessary for non-motorized boats and the gated areas are over-kill. The existing locked gate to the Mendenhall campground is unfriendly. The campground area is promoted for cross-country skiing, yet the gate makes access difficult, especially for young skiers. A removable bollard system would prevent motor vehicles from entering while still being friendly to walkers, bikers, and skiers. Where locked areas are really necessary, please use bollard systems rather than gates.

Again, the development plans for motorized boats and docks send the wrong message to the public. They say that humans are greater (better) than nature, and can dominate it by getting up close and touching. It is disrespectful, inappropriate, and contrary to the Vision and Mission of the MGRA project.

Remote Structures (pods, docks, paved trails) near the Ice:

The boats are proposed to get people closer to the glacier. A second interpretive area close to the ice is not needed and the structures will scar the land as the pods and decks are moved from place to place. I support Alternative 4 for this component since it eliminates the remote visitor components.

Parking Lots:

Existing parking lots will undoubtedly need to change to serve almost any of the development alternatives. The Welcome Center location that I proposed could house many buses and some car parking. Overall, the bus parking should be reduced by operational controls such as limiting the number of buses on site. Buses can find alternative places to park off-site if needed. There are three schools within less than a two-mile radius of the proposed Welcome Center location. The schools do not operate during the majority of the tourist season, so these parking lots should be explored to support bus parking. This would allow less damage to the natural landscape and be more out of sight for those seeking an authentic experience. This is a more sustainable solution and allows the Juneau community to be a partner in assisting the tourism industry. The school parking lots could also be used as start and finish locations for commercial bike tours that could eliminate the need for the vans and trailers used by these groups to be near the Welcome Center. Mendenhall River Community School could be used for parking vans for commercial walking tours that start in the Dredge Lakes trail system and continue to the glacier area. An inventory of existing nearby facilities should be undertaken, and possibilities for collaboration should be explored so as to limit the need for more human impact to the MGRA area for the purpose of parking.

Necessary car parking should be located away from the premiere view areas at the lake edge as much as possible. Because of the historic Visitor Center, a small parking area consistent with the current size that

provides accessible parking in the winter may be needed, depending on year round usage of the Visitor Center. Bottom line – get the cars and buses away from the premiere experience area!

Welcome Deck and Crescent Bridge:

I support a large open viewing area (that I have referred to throughout these comments as the premiere viewing area – it's the initial 'ah ha' place) that is illustrated in the same way on the three development alternatives. Keep this area free from human-built structures as much as possible (benches, limited signage, and sensitively paved spaces will be needed). Demolishing the existing pavilion is desirable for this same reason, but an at-grade platform might remain for photo ops and to channel people to a specific location rather than let them spread all over and cause damage.

I do not support the construction of the Crescent Bridge (also shown on all three Alternatives). I asked multiple people about the purpose of the bridge, as it was not justified in any of the documents I reviewed. I was told by Forest Service project officials that its purpose is to provide a great spot to take a photo of the glacier, and to give an alternative path to the existing paved path that hugs the rock hillside to the existing restrooms and historic Visitor Center. I was shocked by this response (and I do not use the word 'shocked' lightly). The disturbance of the natural environment in this unique and pristine place cannot justify the construction of "a great place to take a photo." There are already innumerable opportunities to take great photos of the glacier. And as the glacier continues to recede, those opportunities will change, so the Crescent Bridge could lose its purpose in a very short time.

Relocating the Welcome Center and pulling the buses away from their current arrival/departure locations will slow the current crush of people so that the existing paved pathway along the rock face may be sufficient. After initially being funneled into the Welcome Center, people will move on to the viewing areas in a softer flow pattern as they venture out to see the sights. If, after thorough study of expected and/or actual new visitor usage patterns (including overall limits to the numbers of visitors per hour/day/week), additional walking pathways to access Photo Point and/or Nugget Falls are really needed, then these should be designed to impact the natural land and viewpoints as little as possible. Perhaps widening the existing path would be adequate. Perhaps a much more modest, at grade paved option that uses a contemporary open paving material would be needed. But any new paths should not in themselves become an attraction – they are only a means for people to move through the place to attain an authentic experience.

Final Notes.

I fully recognize and appreciate that recreation is a critical part of our National Forest's mission. I believe that MGRA can be a flagship for demonstrating protection of a place while offering high quality, sustainable recreational opportunities – in other words, exemplifying the project's Vision and Mission. There is a balance to be met between development and no development that can be sensitively attained.

I am confident that all of the Forest Service staff and consultants working on the MGRA for the past several years are very dedicated in their work and truly want the very best for MGRA. I am sure they feel pressure to keep the project moving. One Forest Official expressed, in a tone of frustration, that he has been working on the project for the full 6 years that he has been in his position. As someone whose career had many long-term capital projects, I can appreciate regulatory fatigue and the desire to get through the requirements as quickly as possible. However, that attitude is not good for this project, or for the visitors and community it wants to serve. I respectfully request that every design alternative in the project be seen through the lens of human impact to the ever-maturing glacier wilderness. Do we truly need to build something? If yes, then how can it be done with the most respect possible for the place that we love, including all the things that we cannot see that make it what it is?

The EIS needs to take into consideration all of the issues I have raised, as well as the many comments by

others. I want MGRA to be rich in its authentic self for generations beyond me, so I am asking that everyone think carefully before changing what nature has created.

Thank you for this opportunity to comment.

Sincerely,

Catherine Fritz