

Below are comments for the Mendenhall Glacier Visitor Facility Improvements Project Draft Environmental Impact Statement (March 2022) version. I am a Juneau resident and have worked in the tourism industry for the last six years.

The Mendenhall Glacier Recreation Area (MGRA) includes essential breeding, migration, and year-round habitat for numerous wildlife species, many of which are sensitive to habitat disturbance and unlimited human access. The Visitor Center represents a valuable resource for educating the public about its unique natural setting, dynamic processes, and natural, historic, and cultural resources. For those reasons it is prudent to consider the potential impacts on those resources to ensure that expansion of facilities does not interfere with accomplishing the stated vision, mission, and goals of the Mendenhall Glacier Master Plan. I am concerned that over-development will jeopardize long-term sustainability of the very resources that attract visitors and local users.

Unfortunately, I cannot support any of the proposed alternatives put forth in the EIS. While some elements seem to be reasonable updates to existing infrastructure or potentially beneficial restoration around Steep Creek, I believe that Alternatives 1-4 each contain elements that would irreversibly alter the habitat for wildlife and the unique natural experience for visitors. Thus, I prefer the No Action alternative. Also, if the decision is made to select one of the other alternatives, I strongly recommend you take our comments into consideration to remove components within the other alternatives that pose detrimental habitat-related impacts to the Mendenhall Glacier Recreation Area. I continue to have concerns, chiefly:

- New trail development, wildlife viewing and bear safety

For several reasons, I have concerns about the Lakeshore Trail and Loop through the Dredge Lakes Unit. At 8 to 12 feet wide, the trail would more appropriately be called a road. While the option that is set back from shore, offered in Alternative 4, is an improvement over the other options, all versions of this trail destroy vast amounts of wetlands, riparian areas, and deciduous habitat, all important to local birds and birdwatchers. The recently deglaciated areas offer a rare habitat and diversity of bird species not found on other local trails. For local users and independent travelers, the Lakeshore Trail and Loop would erase the ability to recreate anywhere with a glacier view that was not in use by multitudes of visitors. Trail sections that parallel Mendenhall River may not be consistent with riparian buffers recommended in the Forest Plan. These were instated to protect this important habitat for fish and wildlife and reduce the risk of erosion along waterways.

Bear safety has still not been fully addressed for the proposed Lakeshore Trail and Loop through the Dredge Lakes Unit. An increase in hardened trails in the area will effectively reduce essential refuge habitat for bears and other wildlife in the MGRA. I am concerned about increased encounters between walkers and bears, the risk of injury to hikers, and an increased disturbance to wildlife in general. New and improved trail construction anywhere should be accompanied by an education program to improve bear awareness and ethical wildlife viewing. Sensitive wildlife areas should be designated, and within them, a leash requirement for pets be instated and enforced. This would minimize the footprint of trails, and assure bears, especially sows with cubs, are not angered. Given the length of the Loop, it is not reasonable to expect Visitor Center staff to be present and in control of interactions on such a trail. And, given the popularity of the Dredge Lakes Unit for local dog walking, often off-leash, it is unlikely that such measures would be popular or enforceable.

- Food service

Also related to safety regarding bears and other wildlife, there are issues with the proposal of food service at the Welcome Center. Food service is counter to the wise management now in effect where food consumption is discouraged near the Visitor Center. This is for bear safety. It also protects other animals such as squirrels and ravens from habituation. (Ravens pose a risk to seabird colonies, so feeding of ravens is a concern for wildlife habitat). The smell of food cooking would be a bear attractant. While the agency may state that vendors will dispose of all food in a proper manner and that visitors will not be taking food outside, given the volume of people and activities during busy summer months, it would be nearly impossible to enforce. Further, a restaurant, seating area and the extra storage for trash and supplies would take up valuable space where the planning already is challenging. Visitors can find many restaurants just a few miles away in town. The public should expect a natural recreation experience at the glacier, not food, shopping, or experiences beyond basic amenities.

- Glacier access development for motorized watercraft

While proposed mitigations state that routes would be established that 'minimize disturbance' to nesting seabirds, the proposed dock location near the Welcome Center appears to allow boat traffic closer to than the Forest Plan's guidelines of 250m buffer for new development near colonial nesting seabirds. It may be impossible to travel from that location to the ice without passing close to the Photo Point Arctic Tern colony and disturbing birds. Further, it does not appear that the USFS has fully considered how the public might use the docks for private boats, or if other agencies may request use of

the docks, making the impact of dock development grow beyond the considerations of the current plan. The USFS has stated that it will maintain control of the docks and lake use, but recent actions by the State of Alaska call this assertion into question.

- Protection of ground-nesting seabirds and shorebirds

While management of seabird and shorebird nesting areas has been addressed in the EIS, ambitious development would undoubtedly impact habitat quality. Monitoring and “adaptive management” will not bring back birds if they have been ousted from their nesting areas, or the surrounding habitat no longer supports their feeding needs. For example, the rich marsh habitat and small water channels that would be compromised by the Lakeshore Trail produce small salmonids and dragonflies, important food sources for young Arctic Terns. Flat areas near the glacier need to be available for Arctic Terns to move into as natural flooding and plant succession renders current nesting zones unsuitable. New trails, buildings and uncontrolled foot traffic could make it difficult to maintain suitable undisturbed nesting areas for Arctic Terns near the glacier face.

- Facilities and updates

With respect to migratory birds, in addition to the actions in Table 2-6, I recommend mitigation measures to protect Barn Swallows. Swallows use the Pavilion as well as some of the bus stops, kiosks and the Visitor Center for nesting. If buildings are slated for destruction or renovation, this should be done after the nesting season, and any new facilities should be constructed with suitable platforms for nesting. Barn Swallows are a favorite with visitors and offer excellent opportunities for wildlife appreciation. As an aerial insectivore the species has suffered steep declines in North America, so much so that it is listed as threatened in Canada, and a conservation concern in other landbird management plans.

I also suggest that any retrofits or new structures, including parking lots, adhere to best management practices regarding lighting for conservation as well as energy consumption. Light pollution poses a risk to migratory birds and other wildlife. Light can attract and disorient migrating birds, making them more likely to land where they are more vulnerable to collisions and predation. Artificial light also impacts birds in the breeding and winter seasons, disrupting feeding and other vital behaviors. Thus, lights should be kept at a minimum, be shielded to focus only on direction of need, face downward, and be warm colors that are less visitable to birds.

Thank you for considering my comments,  
Kimberly Ramos