Comment Letter: Mendenhall Glacier Visitor Facility Improvements Project  
Draft Environmental Impact Statement

I write concerning the proposed Mendenhall Glacier Visitor Facility Improvements Project draft environmental impact statement (DEIS). While I am in favor of some aspects of the infrastructure projects/project components, there are some project components to which I am opposed.

I support the Glacier Spur Road trailheads. This would provide more access points and parking for the Dredge Lake trails. It may spread out visitors during high-use times, and provide locals with year-round, accessible parking lots. I believe this project component is the same under Alternatives 2, 3, and 4.

I support the construction of five new public use cabins at Mendenhall Campground. Public cabins that are accessible from the road system are in very high demand, and are often booked out exactly six months in advance. We need more public use cabins that are accessible from the road system, so adding five more cabins would be absolutely great. I will note that my support is based on my assumption that the cabins will be rented out in the same fashion as any other USFS cabin (so generally available for booking through recreation.gov, and no commercial use/commercial operators allowed). I believe this project component is the same under Alternatives 2, 3, and 4.

I also support some of the trail expansion projects, primarily Steep Creek Trail expansion/Dipper Falls improvements and West Glacier Unit Trails. I cannot quite figure out how the different alternatives would work, but I generally support Alternative 2 for the Steep Creek Trail, which would create the longest boardwalk and the most number of viewing platforms of the alternatives. Alternative 2 seems to offer the best options for visitor use and access of a key feature of the glacier: viewing spawning salmon and other wildlife. For the West Glacier Unit Trails, I support trail expansion, so long as it is not tied to the use of motorized boat traffic on the lake (which I oppose, more on this later in the letter). From the presentation, I gather there is a user-created trail that could benefit from upgrades (for safety and route-finding). So I support Alternative 2 and Alternative 3 (which are the same) to improve and formalize the user-created trail to the glacier, construct a multi-use loop trail connecting to West Glacier Trail, and improve and formalize certain user-created network of mountain bike and hiking trails. This would also seem to increase accessibility and use, particularly on the West side. This could spread out visitors, and provide locals perhaps with a place to visit the glacier during the summer that is a bit removed from the East side. I also am not aware of any environmental downsides to these trail expansions, but I am not sure if the DEIS identified any.

However, I would like to focus on the aspects to which I am opposed, primarily because of their environmental impacts but also because of changes to the aesthetic and scenery around Mendenhall Lake.

**First, motorized boat use, boat docks, and related support facilities project components:** I oppose a change that would allow for motorized use on the lake. Currently, Mendenhall Lake is a fairly quiet place to walk/hike, observe birds, and take in the beauty of the glacier and surrounding mountains. Allowing motorized use is a significant change from historic use, and would, it seems to me, significantly alter the experience of visiting the lake. I am also very concerned about the impacts of motorized use on nesting Arctic terns and other sandpipers and shorebirds that utilize the lake during our compressed summer season. As the tourists are here during our short tourist season, so too are our nesting Arctic terns and other birds, which must lay and incubate their eggs, feed their hatchlings, and fledge and fly during our short summer season. The short-term benefits of motorized use of the lake must be balanced against the long-term sustainability of the Mendenhall Lake area as a nesting site, migration route, and summer home for birds that have used this site for ages. **So, for all project components related to motorized use (docks and related facilities on east and west and the use of boats), I support Alternative 1; no action.**

**Second, Lakeshore Trail:** While I am not opposed to a new trail near, but not along, the lakeshore, I oppose any alternative where the whole or a part of the trail route is right along the lake shore. I believe this is Alternative 2 (2.2-mile-long, 14-foot-wide trail along lake edge with 4 gravel spur trails for viewpoints or trail connections (1,800 feet)) and Alternative 3 (2.6-mile-long, 14-foot-wide trail, with western portion of trail inland from lake with 4 spurs to shoreline (1,700 feet)). I am opposed to both Alternative 2 and Alternative 3. Both options would impact shorebirds that utilize the shore of Mendenhall Lake during the summer months. In the spring and summer, I have done many hikes along the shore, and have been pleasantly surprised to see killdeer and other plovers and various species of sandpipers, as well as passerines and of course the Arctic terns. When out on these hikes, I have usually seen a few other people walking along the lakeshore. No doubt our presence is somewhat of a disturbance to these birds. However, the few people who may walk the lake now would be far different than the use that would be facilitated by a proposed trail right along the lakeshore. As I read the DEIS, I understand that the USFS’s expectations are that the proposed Lakeshore Trail would spread out visitor use from the Nugget Falls/Photo Loop/East Glacier Trails. So, the goal is to increase pedestrian traffic along this new proposed Lakeshore Trail. Increased pedestrian traffic would be detrimental to the shorebirds that utilize the lakeshore during the summer.

However, I would think the inland trail with spurs to the lake would accomplish a similar result: some pedestrians could use the Lakeshore Trail, spreading out visitors and helping to alleviate congestion on other trails. Also, building a new trail would offer a new accessible location for locals and visitors alike, and I do believe increasing accessible access to our forest fits within the multiple use mission of the USFS. **So, I strongly support Alternative 4 for the Lakeshore Trail (or, between Alternatives 2 and 3 or Alternative 1, I support Alternative 1; no action).**

One other note about the Lakeshore Trail: I believe one other touted benefit of Alternative 2 and 3 is that it would create a new maintained and groomed winter trail for cross-country skiers. While, again, I believe access is great, the lake shore is already fairly easily skiable for cross-country skiers. While there is no maintained trail, it is fairly flat, and many of the streams feeding into the lake freeze over during the winter. This past winter, I cross-country skied the east lake shore and/or winter trail once or twice every week from about December to late March. The winter before, I skied once a week almost every week from December to February. While I rarely saw another skier, I often saw cross-country ski tracks. So, I know there are other users besides myself. As I said, the terrain is fairly flat, and open and accessible, for the adventurous skier. I do not believe the east shore and Dredge Lakes system necessarily need a maintained and groomed trail. The past two winters, I have found immense solitude and peace out there skiing—a little respite from the trying pandemic times and the busy rush of downhill skiing weekends at Eaglecrest. So, in sum, I do not believe a new groomed trail on the east lake shore is necessary to facilitate recreational use in that area: cross-country skiers are already using it for skiing in the winter. And the proposal under Alternative 2 (and 3) would certainly alter the character of the east lake shore as a very quiet place to go tooling around on your cross-country skis, exploring new routes through Dredge Lakes, taking in the quiet, and looking for flocks of redpolls (which were everywhere this year!). **As I already said, I strongly support Alternative 4 for the Lakeshore Trail (or, between Alternatives 2 and 3 or Alternative 1, I would support Alternative 1; no action).**

**Third, Dredge Lakes Multi-Use Trails project component and commercial use:** I oppose the Dredge Lakes trails changes and allowing commercial use in the Dredge Lakes systems. Dredge Lakes is currently used quite extensively, in my experience, by locals. In the spring/summer months (tourist season), I see locals exercising their dogs, birding, fishing, and just walking. It is a quiet place to spend the evening. While I do support increased access/recreation generally, I do not see the trade-off here as valuable or beneficial. The over-arching mandate cannot be to always facilitate use for tourists and commercial operators at the expense of year-round residents/locals. So, on balance, I think maintaining the Dredge Lakes system as is (Alternative 1; no action), while expanding Steep Creek trails (Alternative 2 and 3) strikes a balance between (1) expanding some recreational trails and improving visitor experience and (2) maintain a place of solitude and solace for locals to enjoy our spring/summer activities.

One other note: for the Dredge Lakes trails project component, I do not support changing the user-created trails into official trails. Right now, a majority of folks use the official, maintained trails. It seems like only a small number of people actually use the user-created trails. Many of these user-created trails run along some of the more secluded lakes/ponds within Dredge Lakes. The low use of these trails benefits the wildlife that use Dredge Lakes, whether it is hooded mergansers secretly hiding out before moving on during migration or the black bears that use Dredge Lakes all summer. Changing the user-created trails into official trails would increase use in those more remote and secluded parts of the Dredge Lakes system, disturbing the wildlife that have come to rely on those remote and secluded places and potentially increasing conflicts with black bears. **For these reasons, for the Dredge Lakes trails project component, I support Alternative 1; no action.**

Finally, I am torn whether to support the proposed Welcome Center complex. I do believe it could be a helpful addition to the site. We continue to receive a large number of visitors in Juneau in the summer months. Having a larger Welcome Center to accommodate all those visitors and to help inform the visitors and make their visit more comfortable all seems reasonable to me. I am not certain of the longevity of the proposed location, and how soon the glacier would no longer be visible? It seems if we are going to spend a lot of money and utilize a lot of limited resources for a new Welcome Center, we would want it to be usable for over the long-term. But, along those lines, the DEIS indicates that current visitor capacity is 543,000. Alternative 2 would change visitor capacity to 999,000; Alternative 3, 830,000; and Alternative 4, 752,000 (projected over 30 years, 20 years, and 15 years, respectively). It would have been more helpful to project out over the same time frame for comparison of alternatives. Nonetheless, an increase in over 200,000 visitors over 15 years (Alternative 4) or an increase of 456,000 visitors over 30 years (Alternative 2) is a significant change in the amount of use of the Mendenhall Glacier area. At some point, the effects are compounding, perhaps synergistic, and long-lived, particularly for species that rely on the area, such as Arctic terns, other shorebirds, salmon, and bears. We must also assume that quality of the experience will change, for the worse, as the space is overwhelmed. This seems like it will be true, even with the new Welcome Center: that the number of visitors projected under any alternative will irrevocably change the character and quality of the location and will hinder the experience for visitors and locals alike.

The DEIS indicates that we are to consider “Visitor Capacity and Commercial Use Management Changes: As facility improvements under this project are constructed, capacity of the MGRA would be better able to accommodate the anticipated increases in visitation that will occur over the next 30 years.” I would ask the USFS to consider what type of growth is reasonable. While we can anticipate what growth may occur, at some point, we cannot be reactive to change, and we must shape the future we want. What will a visitor experience in a year with 999,000 visitors? What will the summer resident who traveled to Alaska to work for the summer experience in a year with 999,000 visitors? What will the local who lives here year-round experience in a year with 999,000 visitors? What will the Arctic tern, or the killdeer, or the black bear experience in a year with 999,000 visitors? What will locals have to pay (road maintenance to the glacier, diesel fumes from bus service, increased housing costs from competing with the number of part-time residents needed to support a year with 999,000 visitors) for this, a year with 999,000 visitors? Even if a significant number of visitors visit only in a compressed timeframe (spring/summer), what effects will linger throughout the winter, or throughout the year, or in perpetuity in a year with 999,000 visitors? What is the difference, in kind, if any, between 752,000 visitors and 999,000 visitors? Surely these questions remain relevant at 752,000 or 830,000 visitors a year.

As Aldo Leopold said, “The whole conflict thus boils down to a question of degree. We of the minority see a law of diminishing returns in progress; our opponents do not.”

Respectfully submitted,

Molly Watson