

Comments regarding the Mendenhall Glacier Visitor Facility Improvements Project (the project) Draft Environmental Impact Statement (DEIS) of March 2022

I am commenting as a regular user of the Mendenhall Glacier Recreation Area (MGRA). My residence abuts the MGRA and I have been recreating on the area for over a decade. Due to the magnitude of development proposed and in disagreement with the stated need, I am objecting to the proposed project and voicing my support for "Alternative 1 – No Action".

There are problems that need to be addressed in the MGRA , including improved bathroom facilities at the Visitor Center, completion of deferred maintenance projects, extensive trail maintenance, and increased enforcement of closure times and speed limits. Unfortunately the action alternatives proposed address few of these needs while creating additional concerns.

The action alternatives do little to achieve the USFS's stated goal of "To provide for the inventory, maintenance, interpretation, and protection of the existing characteristics and attributes of areas with unique cultural, geological, botanical, zoological, recreational, scenic, or other special features." (DEIS 1.1.2) In fact the actions proposed would substantially damage the existing characteristics and attributes of the area. At its core, the project maximizes tourist visitation numbers to fund increased infrastructure. Yes, the plan does provide for some additional interpretation but does little to increase the inventory, maintenance, or protection of the area beyond what is required due to the increased infrastructure footprint.

The existing MGRA management plan calls for the area is to be managed "principally for recreation use while retaining the area substantially in its natural condition." The Regional Forester's decision memo on the same plan wrote: "It is important that there be an equitable distribution between commercial and non-commercial users. ... One of the primary features of the Recreation Area is the natural setting and wild character of this recently deglaciated landscape. I want to ensure that these natural resource values and visitor experiences are not diminished and that existing and future non-commercial public use is not "crowded out" of the Recreation Area." This proposed project does not adhere to those stated management goals.

This project proposes commercial use within the Dredge Lakes unit with the proposed Dredge Lakes Outer Loop Trail (DEIS 2-31). This unit has never allowed commercial use in the past. It is a popular recreation area for locals during the busy tourist season for that very reason. I do not support this proposal.

The project places a trailhead off Glacier Spur Road near Dredge Lakes. This location is very close to residential lots. I and other owners are concerned about public safety and negative effects to property values. The USFS is not known for regularly patrolling or maintaining their trailhead parking areas around the MGRA. I do not support this proposal.

Proposed power boats on the lake will profoundly change the character of the area. It should be a point of pride that the MGRA has a lake that does not permit motorized boat use. The tour boats proposed, either electric or alternative-fueled, would present environmental hazards if damaged by rock, fellow craft, or operator error. Leaking fuel and chemicals would be hard to control in the cold water of the lake. (reference the opinion of a local marine surveyor Jim Sepel in his Juneau Empire article of 4 May 2022 - <https://www.juneauempire.com/opinion/opinion-power-boats-should-not-be-permitted-on-mendenhall-lake/>) If we allow commercial power boats on the lake it becomes that much harder to argue against private power craft being allowed in

the future. Additionally the USFS's own Market Demand and Economic Analysis for this project states that most visitors spend less than 90 minutes at the MGRA. Even on a guided tour, a typical visitor would have little time at the remote glacier locations. I do not support this proposal.

The MGRA portion of Glacier Spur Road is currently poorly patrolled for speeders during much of the year. Encouraging more traffic, which this project does, will reduce public safety. Negative effects on the community are recognized: "Some key roadway intersections, particularly in the Mendenhall Valley, have become overburdened with traffic and are inadequate to support increased development. Comments from the public during the scoping period for this project indicate some neighbors directly adjacent to the MGRA experience annoyance and decreased quality of life from high traffic volumes and associated traffic noise" (DEIS 3-189) Note that the congested roadway intersections mentioned are on the only route to the MGRA. I do not welcome the current levels of speeding cars and diesel buses that I experience, and I am certainly opposed to an increase. I do not support this project due to the negative impacts on the neighboring community.

Non-NEPA concerns: Current deferred maintenance needs of existing structures, trails, and trailheads within the MGRA are apparent. The Market Demand and Economic Analysis (p.2) refers to increasing revenue to fund the project. I do not believe that this will be a revenue-neutral project. Project costs will inevitably overtake revenue over time and deferred maintenance needs will again be apparent - but on a larger scale with additional structures, trails and trailheads. I did not see any evidence in the posted documentation to contradict my expectation. I do not support this project due to the expected need for additional public funding of a project rife with identified shortcomings.

In conclusion, commercial tour operators and high-volume/short-visit tourists should not dictate infrastructure needs. Commercial visitation numbers are the easiest thing for the USFS to control.

While I support Alternative 1 – No Action I also recommend:

- No increases in commercial permit allocations. Some commercial tourists in the future may not be able to access the MGRA due to visitor limits. I think that's OK. The MGRA would not be the first public area to turn people away .
- I support an increase in the visitor fee from \$5 to \$9 (as suggested in the MGRA Market Demand and Economic Analysis) if the revenue is routed directly to MGRA maintenance and limited site improvements including improved restrooms.