

18005 Point Stephens Road
Juneau, AK 99801

February 20, 2023

Dear MGRA Planners and Responsible Official,

Thank you for your invitation for comments on the USDA Forest Service Mendenhall Glacier Visitor Facility Improvements Update and Supplemental EIS.

I appreciate your thoughtful review and the new Alternatives presented and their responsiveness to the earlier public comments. I want the visitor to the MGRA, whether tourist or resident, to have a high quality experience of a special natural feature of Juneau, Alaska and the nation. I am not against, and recognize the necessity of having some areas of human concentrated use in the MGRA. I think these areas of concentration should remain on the east side of the lake and that the MGRA should offer some less than Urban classified experiences to visitors who cannot hike far. I do not support the plan for the route along the lakeshore proposed in any of the alternatives.

My comments for this review focus on the plans for a "Lakeshore Trail" as my earlier review and comments did not recognize the scope and impact of this improvement. I did not fully visualize the improvement that is in the plan or understand the impacts of this improvement as the plan mis-characterizes this improvement as a "trail." In more careful review, I recognize that all Alternatives besides #1 and #4 include a ROAD. Since the plan used the word "trail", I conceived of a trail similar to other trails in the Mendenhall Glacier Recreation Area and in Juneau. I am against the lakeshore road proposed in these alternatives and also oppose the bridge and improvements in the campground area that will encourage an Urban experience as described by your ROS in the campground and Skaters Cabin area.

The route/way proposed would never be understood in common usage to be a trail. The route is either 14 or 12 feet wide in Alternatives 2, 3, 5, 6 and 7. (The 12 feet wide alternative includes a 2 feet wide shoulder, so it is really 14 feet wide as well.) In these alternatives it is also paved. The plan would more accurately describe this route to the public as a paved road. I am opposed to a paved road along the Mendenhall Lakeshore. I think such a road will distract from the visitor's experience, both tourist and resident.

I think you should explain to the public in an accurate way that all but Alternatives 1 and 4 include a road. To try to visualize this road, I went to the Mendenhall Glacier Recreation area this weekend with a tape measure. Since the current roads and trails are snow covered, my

measurements are estimates on the width of the various routes, I expect you have the accurate measurements. No trail, and even most roads, do not reach 14 feet across. The Dredge Lake Trail which starts at the Mendenhall River Bridge is about four feet across. The Steep Creek Boardwalk is between 6.5 and 7 feet and the trail is about 4.5 feet across. The trail across the bridge to Nugget Falls is 5.5 feet and the trail narrows to around 4 feet across. The railings on each side of the trail to Photo Point are 6 feet 10 inches apart. The railings on the walkway to the Pavilion are 5 feet 4 inches apart. The broad sidewalk from the parking lot to the Visitor Center stairs is 10 feet across. The single lane roads in the campground are 12 feet across, but no one describes them as a trail, they are commonly referred to as roads. The double lane road in the campground is 19 feet. Other trails in Juneau that I visited, even the improved ones such as Herbert River Trail or Horse Tram Trail, are four or five feet across. Alternatives 2, 3, 5, 6 and 7 are proposing a paved road not a trail.

Your Mountain Bike Trail Report was incomplete in not including the "Lakeshore Trail" as a bike path. The Mountain Bike Trail Report does acknowledge that all trails are multi-use trails and therefore available to bicycles, but it does not acknowledge that the ROAD proposed in Alternatives 2,3,5,6 and 7 for the Lakeshore is really designed for its best use as a road for bicycles. The design that encourages bicycle use will be a detriment to other users. I do not begrudge the use of the Herbert River Trail for bicycles, but since it was improved so that its best use is bicycles, I no longer use it for walks and I certainly would never bird watch there. Similarly, this lakeshore road, with the volume of bicycles envisioned, would be unsafe for birdwatchers and naturalists.

I am an avid trail user, so on the face of it, I am not against trail improvements in Juneau and in the MGRA. Your plan should have a gradient of use for visitors to the area which should not expand the Urban classification to this lakeshore area. There should be somewhere that visitors to MGRA can go where they can view the glacier and not run into high concentrations of people. The proposed design of this ROAD with the bridge in Alternatives 2,3,5,6 and 7 will degrade the experience of bird watchers, naturalists and campers. Besides the concentration of bicycle use, the envisioned classification and PAOT make it possibly a scenic trail, but certainly not a nature experience. The classification is Urban throughout. This classification's description in the appendix for ROS includes "High concentrations of people and sights and sounds of human activity are acceptable." Under "Social Encounters" it states that, "Interaction between large number of users is high." This is especially in contrast to the current feeling of a remote experience of the West Glacier area. The bridge in these plans combined with the Urban classification and planned for density of people will lower the value of the experience. The PAOT of 125-150 is just too concentrated. The 214,000 to 321,000 visitor capacity of the plans for this route are the same as that for Nugget Falls. This area should be managed for less concentration of human use. It is also unfair to the campers in the campground to route

214,000-321,000 visitors to their campsites. This is a planned intrusion to their experience. The proposed parking lot and picnic sites will further invite day use to the overnight use area and intrude on the possible serenity of the campground experience. I urge you to not build the bridge across the river on a Lakeshore ROAD or trail.

I am a Nordic skier and member of the Juneau Nordic Ski Club. I understand that it does get repetitive to ski multiple circles on the campground roads to exercise, but I do not support building a lakeshore road from the visitor center to the campground to benefit this winter use. The groomed trails on the lake, in years when that is possible, expands the available skiing on the campground roads significantly.

I encourage you to not build a route along the lakeshore, if you do build a lakeshore route to not build a bridge on a lakeshore route across the Mendenhall River, to not pave the route, to limit the width of the route to four or five feet and to avoid mixing day use and overnight use in the campground area. Although the "Lakeshore Trail" proposed in Alternative 4 is a smaller, "inland" route, I do not think the spurs to the lakeshore would significantly decrease the number of people on the lake as people will just walk along the lake to get to the next spur and possibly damage the habitat in doing so. An 8 feet wide route is still much wider than the other actual trails in Juneau. The proposed ROS for the Lakeshore Trail in Alternative 4 is Urban, the same as in the other action alternatives, so this Alternative does not provide for a different ROS experience. The visitor capacity in Alternative 4 at 214,000 will not provide a continuum of experience options for visitors.

Thank you for allowing us to comment. I hope your final plan does not include a road along the lakeshore or a bridge to connect the east glacier to the west glacier.

Sincerely,



Margaret Cowan