Data Submitted (UTC 11): 6/23/2023 8:00:00 AM
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Organization:
Title:
Comments: MGRA OBJECTIONS 6/23/2023

Thank you for eliminating motorized boats and all the destructive support elements they require. That is an important response for public safety and a better visitor experience. Existing outfitter/guides provide specialized tours without motors. I strongly support this decision.

My objections concern comments I have made previously.

A) I object to Steep Creek Trail encircling the mouth of the stream.

Rationale: This is a critical location for many species of wildlife, and most essentially for spawning salmon which are key to all other species. Bears are reluctant to forage when trapped by structures that surround them. This proposal blocks ingress or egress from essential salmon habitat.

The alternative that provides a half circle design satisfies the purpose and need while preserving what attracts visitors without harming the wildlife.

B) I object to the location of the Glacier Spur Road access points for both the Powerline trail and the bus parking lot.

Rationale: These two intense human uses can be accommodated with alternative entries located a short distance farther south on Glacier Spur Road.

This change satisfies the purpose and need while accommodating pedestrian, vehicular and bicycle safety, reducing harm to salmon and stream banks, and preserving buffer zones for bears to keep safely distant from other bears and people.

Significantly, no documents clearly show where the stream will be rerouted when the bottomless arch culvert is constructed under Glacier Spur Road. To build adequate space for stream design, and for sufficient forest cover as buffer for bears, these two vehicular access points can very easily be relocated away from the stream.

C) I object to the location of the Welcome Center.

Rationale:

1) The hillside location [mdash] proposed in a drawing submitted by me and supported by many other commenters [mdash] does not impact the viewshed.

2) The hillside location minimizes environmental impacts and preserves sensitive habitat near the mouth of Steep Creek.

3) The hillside location negates the need for a bridge over the kettle pond, thereby saving the public[rsquo]s

money as well as enhancing the view, protecting the lake and pond environment while satisfying the needs of visitors.

4) The hillside location can achieve the goals of the project[rsquo]s purpose and need without damaging important riparian habitat used by spawning salmon, otters, beavers, herons, wolves, bears, or seals that use the lake to hunt for salmon.

5) The hillside location can architecturally connect with the existing visitor center on the same hillside which provides better flow for visitors to exhibits, restrooms, vistas, and interpretation opportunities.

6) The hillside location enhances the existing and beloved visitor center. A similar design to the Linn Forrest building instead of a boxy structure on the lakeshore would present a cohesive and grand sense of the landscape and natural area by blending into the terrain. It would indicate a respect for the place by focusing on the view instead of blocking the view.

7) The hillside location enhances human-bear safety. The ROD on page R-27 states the proposed Welcome Center location [ldquo]maintains areas of observed bear movements on the hillside southwest of the Visitor Center.[rdquo] That is true. However, building the Welcome Center on the hillside is likely to deter bears from using a high-conflict location. It is one of the most challenging places to manage bears and people. Vegetation management now (June, 2023) has successfully opened the EZ Walk Ramp to observation [mdash] and thus management [mdash] of human-bear conflict. In the past, even the most experienced MGVC bear managers have had troublesome events occur on the hillside. Managing bears on the hillside requires a minimum of three staff, often more, to direct people away from foraging bears and to provide safe access for visitors.

8) The hillside location leaves the pavilion as a different venue for visitors. The pavilion is rarely full of guests which means it offers a more personal and quiet perspective to enjoy the area.

D) I object to food service in any facility due to its impacts of human safety and bears.

Rationale: It is well documented that food conditioned bears pose the greatest threat to human safety. No food service should be allowed that could attract bears. We have many examples of human-food-caused incidents.

The space for food service should be redesignated as restrooms. That is the highest and best use and strongest need in the Welcome Center.

E) I object to the elevated Crescent Bridge above the kettle pond connecting the Welcome Center and the Visitor Center areas.

Rationale: This structure is not needed. Visitor access can be achieved without blocking the viewpoint by widening the existing walkway and building the Welcome Center on the hillside. Visitors come for the natural beauty, not masses of other people in their photos. Beautiful vistas without foreground crowds can be constructed adjacent to, rather than in front of, other points of view. It not necessary to build this bridge in order to satisfy the purpose and need for the project,

F) I object to finalizing the EIS because too many aspects are incomplete.

Rationale:

1) Analysis of impacts on bears is inadequate.

2) Relocation of Steep Creek is not fully explained nor evaluated; it is simply a proposal with sketches.

3) The determination of culvert design is incomplete. Words say it will be a bottomless arch design.

4) The plan does not detail how the creek realignment would affect the upstream creek bed, flow and landscape.

5) These are conceptual features of the proposals. Without more specific plans, public comments are not meaningful because they cannot address specifics.

6) The Section 106 Historic Preservation Act draft programmatic agreement has serious incomplete portions. The document has no relevant content about this project. It merely sets out the procedures to be followed when information becomes available. It is a formula with no specific details to help a commenter know the impacts of proposed actions.

G) I object to certain aspects of the proposed expansion of the Nugget Falls Trail.

Rationale: Additional beach access to popular Nugget Falls can be achieved with minimal environmental impact by building small bridges over four existing shallow creeks that drain to the lake. This allows guests to experience glacial phenomena by walking on naturally hard-packed silt and glacial till. Interpretation can show recession markers. The proposed plan to construct a 12-inch-above existing grade 2,400 foot long trail will NOT provide access during periodic flooding, as the document suggests. During typical flooding events, the beach and NFT are temporarily inundated by feet of lake water. It is not reasonable to build for those limited conditions. Bridges without a trail can achieve the goals of the purpose and need statement.

Our guests come to Mendenhall to experience natural Alaska. They will benefit from walking on the unconstructed beach with its exceptional open views of the lake and glacier. Minimal improvements to this area will help visitors see the waterfall without the strenuous walk to the falls on the hardened trail and its obscured vistas. Also, Nugget Falls Trail [mdash] due to its length [mdash] often leaves hikers breathlessly panting on their return and nervous about missing their tour bus. They hustle to see the waterfall which is invisible until they are almost at the end. This trail has the highest incidence of emergency reports to rangers because visitors overexert themselves. Provide hikers a simple, easy option without a formal trail on the beach. Protect sensitive nesting habitat creatively.

H) I object to the inadequate amount and insufficient quality of biological information on bears.

Rationale: The response to my comments that not enough information was known about bear movements in prospective development areas states the decisions did not require more study. I strongly object to later study. The impacts must be analyzed prior to design and site designation. Repeating the mistakes made with the 2005 Steep Creek Trail is wrong and unnecessary. Learn from that error.

Moreover, despite NEPA 1502.23, the statement that decisions were [ldquo]based on available information[rdquo] is a frail excuse that essentially renders NEPA requirements meaningless and public

comments ignored. It is a justification to seek only information that supports the decision rather than to select the best alternative.

Similarly, in spite of repeated comments about how bears utilize the mouth of Steep Creek, the ROD allows preferential human access (with a trail encircling the creek mouth) over the needs of bears. Bears would be excluded from essential foraging habitat for the pleasure of visitors because they would be surrounded by people.

The purpose and need can be achieved [mdash] and more effectively [mdash] by providing human access on only one side of the creek. We have seen this demonstrated upstream on this trail where bears had better escape options. The creek mouth has been protected, with people allowed only on one side of the creek with an extensive buffer. That action allowed free movement of fish, bears and other wildlife. Because people were excluded, MGVC became one of the best places in Alaska for visitors to watch bears and cubs as they fish for salmon and traverse safely.

Solve this crucial dilemma by creating a one-sided viewing access on the east side of the creek at the stream mouth. This choice benefits humans and wildlife without harming either species.

I) I object to the location of the Lakeshore trail.

Rationale: Constructing a trail on the exposed lakeshore would require massive amounts of fill material and destructive work to raise the grade above summer flood level.

A viable and better alternative exists farther into the forest on terminal moraines that are high enough now to avoid most flooding. Spur trails perpendicular to the lake would meet the purpose and need of seeing the lake while reducing environmental impacts and preserving the natural viewshed.

Creating an exposed lakeshore trail robs people of a natural view. The manmade object [mdash] which would be a huge road-like structure [mdash] becomes the key feature of the Lakeshore landscape rather than the landscape itself. The eye is drawn automatically to the disruptive, out-of-place item.

A perfect example of this distractive phenomenon exists already. There is a billboard on the lakeshore. It warns snowmobilers in winter to not go beyond that point due to the threat of thin ice. The sign is a sheet of plywood on two posts. It is the most dominant visual attraction for people viewing the lakeshore from the visitor center. Thus, instead of seeing the glacier-created shoreline, they see a billboard. To avoid that unpleasant distraction, the best trails and signs are discreet in natural settings.

We can compromise by making a trail inside the forest that parallels the shore but doesn[rsquo]t protrude onto the beach. It is cheaper because the moraine offers better grade. It is secluded. Yet the views of the lake and glacier can be enjoyed by building short perpendicular spurs that remain hidden. This solves two important needs: beautiful view preservation and increased access. One doesn[rsquo]t take from the other.

J) I object to changing the Visitor Center Unit boundary to include the Lakeshore Trail.

Rationale: This change would allow commercial use in the Dredge Lakes Unit. It circumvents long standing objection to permitting such usage in Dredge Lakes.

K) I object to locating a viewing platform close to Dipper Falls.

Rationale: Dipper Falls is sensitive habitat. It needs greater protection to ensure salmon, especially coho, are undisturbed during spawning. It is also a nesting site for American Dippers, thus the name. The purpose and need can be served at a protective distance.