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Comments: Regional Forester David E. Schmid

USDA Forest Service, Alaska Region

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June 26, 2023

Dear Mr. Schmid,

This is my formal objection to the draft Record of Decision for the Mendenhall Glacier Recreation Visitor Facility Improvements project under the 36 CFR 218 Pre-decisional Administrative Review Process.

I provided written comments in response to scoping on March 19, 2020, to the DEIS on May 9, 2022, and on the SDEIS on February 21, 2023 which gives me standing to object to the project.

SCOPING

My initial comments to the scoping in 2020 were made because the solutions presented in the project fell out of scope of the initial concerns of crowding at the Visitor Center. The project spilled into other areas well outside of the Visitor Center. The outlying areas do not feel congested and are suitably enjoyed by locals and independent tourists who have more time to spend than the standard cruise ship passenger. So why the broadened scope? Did the Forest Service expand the scope to accommodate special interests (commercial guiding and the ski club) and not necessarily wholly addressing the crux of the problem? The solutions have a huge slant toward serving certain people and not preserving the land, which in preserving the land would enhance the visitor experience.

CONFLICT OF INTEREST

Once the DEIS came out, the solutions presented in the scoping document were only formalized and again fell way beyond what was to solve crowding at the Visitor Center. For example a 14' wide Lakeshore Trail (and the previously proposed boats) were addressing special interest desires. In one of the public Zoom presentation on January 26, 2023, individuals asked how cruise ship passengers would have the time to take these tours and use this trail. The response of James King was that surely once the cruise ship industry understood the time involved, they would change their time frame to accommodate these tours. Is this a "Field of Dreams" for some USFS employees who have a conflict of interest due to their side investments (iRide Alaska) and connections with other local tour enterprises? "We will build it and they will come". This employee should have recused himself from the project from the beginning.

VISITOR LIMITATION

The Forest Service quoted in response to my question about limiting visitors that the mission of the Forest Service was both caring for the land AND serving people. Limiting visitation does not conflict with "caring for the land and serving people". The Forest Service limits use at campgrounds, recreation areas, and wilderness areas. Why not provide some firm limit to the MGRA that doesn't create such large impacts? As it stands now, every few years the Forest Service continues to increase the capacity of the area. This number cannot continue to grow exponentially and care for the land. There has to be a balance as our natural resources are in fact, limited. The approach to this project is heavily slanted toward serving (endless numbers of) people and not caring for the unique features of the landscape. The Trail project (and the boats) ignored preserving land by paving over acres of habitat and changing the whole feel and dynamic of the area. The area is prone to flooding and a changing

shore line. The Forest Service is urbanizing a wild area and the solution is not within the scope of solving overcrowding. In fact, it accommodates tours, and I would argue there is an attempt to draw more people for commercial benefit.

LAKESHORE TRAIL

Due to the time constraints of the majority of visitors which are from cruise ships, will crowding be dissipated? The trail only offers a view of the glacier to a certain point. The Lakeshore is not currently crowded nor is the well established Moraine Ecology Loop. Visitors stick to the platforms, the Photo Point trail and the Nugget Falls trail (which is not particularly packed either). I have asked the questions whether the USFS has actually monitored or used the trails themselves? There is nothing to prevent visitors from walking out on the lakeshore now. Why wouldn't a shorter gravel based trail to the point to view the glacier, similar to Nugget Falls trail, be adequate? Is a "road" really necessary? What is different with the Nugget Falls Trail that wouldn't apply to the Lakeshore Trail? Why is a trail wider than 8 feet on Nugget Falls trail "road-like" and not road-like on the Lakeshore?

The 14' paved width of the Lakeshore Trail may have been specifically requested by the Juneau Nordic Ski Club. See comment 151-1 "Additionally, we ask that the USFS also work with the JNSC regarding trail location, layout and construction that will accommodate grooming equipment with a minimum width in the 14' range (Appendix A)". Another JNSC skier comment 221-2 indicated the trail need not be paved and could be gravel. As a nordic skier, I do not see a positive trade off between making an additional ski trail at the expense of acres of land and habitat, completely changing the nature of the area. The lake, campground and Dredge Lakes do exist for skiers already, though Dredge Lakes is not tracked but could be from Lake access or other access from the road. Bike tours also have an eye on this as a paved trail; but is it a safety issue to put bike tours and people trying to walk along at the same time.

NUGGET FALLS TRAIL

The Nugget Falls Trail could be widened and it is already a loop, though not formalized. When the Lake is flooded, I personally just do not go that way. Many times it is passable across the stepping stones, but sometimes I am not comfortable with that. I have noticed most cruise ship visitors stick to the gravel trail. Why can't that be widened? When the lake floods, everyone will have to use the higher trail anyway. According to the Forest Service response to my comment, the widening alternative was considered, but ditched. Why? The points where blasting needed to occur in order to widen the trail are not located on the proposed Loop anyway. So how is the loop removing crowding at these pinch points? Saying that blasting cannot happen, when in fact it has near the Falls is questionable, and the rest of the project is much more ambitious than that. Saying it can't be done is not believable. Apparently too, the loop is supposed to prevent people from disturbing nesting areas. So what will the loop look like? Is this another paved roadway with rails?

VISITOR PROJECTIONS

As far as visitor numbers as impacted by city reduction in cruise ships, the USFS response to me was that the visitor projections would increase the same amount regardless of the number cruise ships. So that is random, especially when most visitors are cruise ship passengers. Because of this response, the projections seem loose and arbitrary.

VISITOR CENTER

It is extremely disappointing that the location of the Visitor Center has been retained in the original alternative. Were the alternatives presented just a false good faith attempt at responding to comments? Was the design already too far along and too invested to change it? How is crowding eliminated when people are being dropped off in the same exact area where there is crowding? The views would be blocked by numbers of people as well as a huge new structure. Views of the ponds are eliminated as well, either by the walkway bridge or eliminating the ponds altogether. The ponds were a draw for bears and other animals. Is the focus on drawing people into the buildings and the concession? Setting the Visitor Center away from the glacier makes sense to alleviate crowding and dispersing numbers, allowing people to decide where they would like to go rather than being

channeled.

CABINS

How were the decisions made to size the cabins? Why so many and why so big? Why aren't they the standard size as other USFS cabins? Again there is definitely impact for neighborhoods and impact on current sites in the campground.

EXPANDING BOUNDARIES WITH MGRA

I mistakenly used the wrong language saying expanding the MGRA and the USFS responded that they were not doing that. So my point was not taken at all. However, I do not think the boundaries within the MGRA should be expanded because it is encroaching on residential areas. I do not think that the USFS should incorporate Dredge Lakes trails. That would change the nature and quality of experience in that wild area, opening it up commercially and taking away from a "calm walk in the woods", language used for the Nugget Falls trail, but actually currently DOES apply to Dredge Lakes.

SUGGESTIONS

Involve the PUBLIC as much as outfitter/guides from the beginning. It appears the process happens behind the scene and that the public process is just a formality well after decisions have been made. So the public actually does not have input to decisions made.

Involve all groups into the Dredge Lake conversation. All groups seem to have been involved, but what about the birders and those who enjoy a quiet walk in the woods?

Survey the tourists visiting the center for their actual feelings and comments rather than inferring what their experience might be.

Better monitor actual use of all trails.

Consider smaller cabins and other heat source due to Valley burn bans.

Better projections of visitors and more accurate daily visits. Why did the season extend from April 1 - Oct 31? Some of the area is not really useable and covered with snow April 1.

Create alternatives to the Lakeshore Trail and Nugget Falls Loop that the USFS would actually consider. Drop these trails completely from the final ROD and look into them at a later date if necessary after all the other construction is done.

Reconsider location of the Visitor Center and whether the current design actually alleviates crowding at the drop-off point. Consider disruption that the current plans will have in the interim on visitor experience and crowding. Consider relocation of the Visitor Center and using electric shuttles to drop off people at Steep Creek, the viewing platforms, the current visitor center. Just upgrade the bathroom facilities.

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