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Comments: The proposed policy change to the Alaska Region Supplement to FSM 2720 should be adopted. Implementation of the proposed change will improve management of the Mendenhall Glacier Visitor Center(MGVC), ensure capacity limits are met, and enhance public, employee, and wildlife safety. It will also bring greater consistency and fairness to the commercial transporting industry that serves MGVC.

Management: By requiring all commercial transporters to MGVC to apply for and obtain a special use authorization in order to operate in the unit, all commercial operators will be required, through permit terms and conditions, to follow established operational procedures such as pick-up and drop-off zones, designated parking, and guest services. They will also be held to consistent requirements for safety, security, and cleanliness applicable to the site.

Site Capacity. The commercial-use capacity was established in a Decision Notice signed by the Forest Supervisor in 2015. The number of service days available for commercial outfitting, guiding, and transporting was limited based on the site's ability to safely and responsibly accommodate visitors. All available service days were issued to permitted operators and the use of the site has reached capacity. Unauthorized operators transporting visitors to MGVC cause the capacity to be exceeded and results in use levels above that set in the Decision Notice possibly resulting in negative impacts to the visitor experience, resource conservation, and the limited facilities of the site.

Safety: MGVC is a crowded and congested site during peak season. There are often hundreds of visitors including pedestrians, cyclists, private cars, and commercial vehicles operating within a very small space. Safe and efficient management of this potentially hazardous zone depends on effective and efficient management of the site. This requires appropriate regulation of the use of the site administered primarily by MGVC staff. Administration of the terms, conditions, and stipulations contained in the special use permit enable staff to monitor all commercial activity and, if necessary, enforce compliance with those stipulations. A big part of the job of managing MGVC includes protection of and management of the wildlife and fish in the area, especially black bears. Keeping visitors a safe distance from bears is a daily challenge for the staff and the authorized commercial operators. It is imperative that all operators employ the safety protocols spelled out in the special use permit. Without the permit, the staff would have little or no ability to direct operators' movements safely around bears and other wildlife.

Consistency: All commercial transport operators, whether, buses, vans, taxis or transportation networking companies should be subject to the same requirements to apply for and obtain a special use authorization. Exempting one or more classes of operator, would be inconsistent and viewed as inequitable by those who are in compliance with the permit system. Unless there is equal application of the permit requirements, there will be a two-tier system in place consisting of those who operate under a permit and those who do not. Such a two-tiered system would inevitably lead to conflict, resentment, confusion, and lack of faith in the ability of the Forest Service to manage public use of the site.

Thank you for the opportunity to comment on this proposal.

Respectfully submitted, Brad Orr