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Comments: I have lived on Glacier Spur Road adjacent to the MGRA for 13 years and am a regular, year-round user of the MGRA. The DEIS (p. 1-6) states the proposed action and alternatives have been designed to meet the goals, objectives, and desired conditions for management of Special Interest Areas on the Tongass; however, these changes and management measures are too extreme and not necessary. While updates are needed to the visitor center facilities, keeping changes to the MGRA simple and green will better meet the purpose of the project to accommodate projected future visitor use while protecting the unique characteristics and outstanding beauty of the area. It will also better respond to the need to continue to provide quality opportunities for all visitors to enjoy the recreation area, to provide new recreation and interpretation experiences that emphasize the area's outstanding scenery and wildlife resources even as the glacier recedes out of view of the existing Visitor Center, to meet the demand of the visitor industry and support the economy of Southeast Alaska, and to protect the area from environmental impacts associated with increased visitation. (DEIS, Section 1.2.1 Purpose and Need Statement, p. 1-8)

*The visitor capacity increase of 2% per year under all the action alternatives is too high for the purpose and need of this project. The MGRA Market Demand and Economic Analysis (p. 1), indicates the increase in visitor capacity is needed to pay for the design and construction of new facilities, "Emphasis was placed on commercial users, reflecting the significance of the MGRA as a visitor attraction and the need for new revenue generation to design and construct new facilities." While there is a need for updates to visitor center facilities, the proposed increases are not a solution, it's a choice that creates negative impacts throughout the MGRA and the community. Without this proposed visitor capacity increase (primarily commercial users), most of the proposed changes to the MGRA could be eliminated or scaled down significantly below what is proposed in any of the action alternatives. The DEIS provides no data or references to support why visitor capacity is based on a 2 % linear growth projection for the tourism industry and why this was retained under all of the action alternatives.

*The explanation provided in the DEIS (p 2-56) for why no capacity increase was rejected from consideration is insufficient. It simply states facts and that it doesn't meet the purpose and need. However, as stated above, the MGRA Market Demand and Economic Analysis indicates the projected future visitor use in this DEIS is based on the need for new revenue to pay for the new MGRA facilities. Therefore, no capacity increase or a significantly lower increase could meet the purpose and need if many of the proposed changes were eliminated or reduced.

*Retain the Dredge Lakes Unit as non-commercial use. With the proposed visitor capacity increases and resulting increase commercial use of trails in the Visitor Center complex and West Glacier Unit, this would be the only unit with no commercial use. Retaining this will provide quality opportunities for all visitors to enjoy. The increased noise, habitat fragmentation, and trail usage in the other units leave this as the only area for visitors and locals preferring a more natural experience with greater solitude and opportunities to view wildlife. Additionally, the very flat terrain makes it easily accessible unlike many of the trails in other parts of the MGRA and nearby.

*Do not construct the Dredge Lakes Outer Loop Trail because of negative impacts to this Unit, local users, and adjacent property owners. This trail would incorporate trails that are currently low use and mainly used by locals for exercise, dog walking, cycling, and viewing wildlife. The proposed usage of 77,040 would displace local users and wildlife and lead to the creation of more social trails, trash, and habitat destruction. The DEIS does not address the adjacent homeowner's loss of privacy, vandalism, and reduced property values that could result from proximity to this trail.

*Glacier Spur Road Trailheads -- Do not construct the Dredge Lakes Glacier Spur trailhead parking lot because it

is not needed and will unnecessarily impact wetlands. This location has not been an access point for the trail system because this is a lightly used part of the Dredge Lakes Unit and is close to the two other parking areas. Page 3-81 of the DEIS is wrong when it states that vehicles currently parallel park on the roadside at this location. I have lived near this location for over a decade and have rarely seen a car parked there, unlike the proposed Crystal Lake and Powerline parking areas, which are access points. The southern part of Dredge Lakes Unit already has two trailheads on Back Loop Road (at the Mendenhall River and the Forest Service ranger station) and one at the end of Dredge Lakes Road. This parking area is also not needed because users can access this location by taking the city bus which is about a 5-minute walk away. The entire southern Dredge Lakes Unit is accessible by city bus, with stops less than a 5-minute from trailheads.

*Dredge Lakes Multi-Use Trails --Do not include any of these proposed changes and additions. These changes and increase usages would further disrupt wildlife, increase habitat fragmentation, and lead to additional erosion and destruction of this environment.

*The boats, boat docks, and related support facilities are not needed based on the MGRA Market Demand and Economic Analysis and will create unnecessary negative impacts. Visitor use levels at MGRA are primarily driven by the cruise ship industry (DEIS p. 3-74) and most visitors do have time for the proposed boat trip to the glacier.