

Data Submitted (UTC 11): 2/21/2023 3:19:51 AM

First name: Joni

Last name: Packard

Organization:

Title:

Comments: Thank you for the opportunity to comment on the 2023 Supplemental DEIS for the Mendenhall Glacier Visitor Facility Improvements Project.

I served as the Planning Team Leader for the 1996 MGRA Plan Update (including authoring the "Capacity Analysis and Commercial Use Allocation Resource Report"), as well as serving as the Juneau Ranger District's Interpretive Services Staff Officer responsible overall for the Mendenhall Glacier Visitor Center and special use permits authorizing tours at the MGVC. Then, as now, "the Glacier," is near and dear to me. And while I now live in the Lower 48, I have been back to Juneau many times, surprised at how fast the Glacier is retreating and how quickly tour visitor use has intensified.

The "vision" in 1996 for the MGRA was to ensure that all visitors (locals, cruise ship visitors, non-guided, non-local visitors) would have a quality recreation experience, while retaining and preserving this area for what it was set aside for - recreation and geologic wonder. The capacity constraints in 1996 were meant to be adaptive, knowing that tourism visitation would increase - the core basis though, was not unconstrained increases in volume of visitors, rather it was creating a framework to ensure both quality recreation experiences and a balance that would allow managed growth in some "prime" areas (such as the MGVC) while retaining areas where visitors (locals and non-local visitors alike) could enjoy a less crowded recreation experience in other "prime" areas of the MGRA as well.

Unfortunately, all of the alternatives as proposed, including the No Action Alternative, do not manage use, they are only allowing significant increases in commercial use (with corresponding levels of infrastructure) without really assessing the impacts of that use on the recreation experience. For such a small area (only 5,800 acres overall, including the lake), the proposed levels of visitation do not ensure a quality recreation experience for anyone.

The alternatives also really do not address the bigger issue - the rapidly retreating face of the Glacier that could be out of prime view in as little as 7 years (as noted/illustrated in the MGRA Glaciology Report). The level of taxpayer investment for infrastructure improvements as currently proposed across all action alternatives, with such a short time of viable viewing (whether 7 years or 20), makes me wonder if a different location entirely (including outside the MGRA boundaries) should be considered that can facilitate "seeing the Glacier" long term (this is vital to the tourism industry as well). Two summers ago, I was amazed how little of the Glacier I could now see from the base of Nugget Falls! And the view from the Visitor Center, Photo Point Trail, and Pavilion area itself is also rapidly changing.

I concur with the comments of two of my former colleagues, Michael Terzich, and Ken Post, who have submitted comments on this SDEIS. My additional concerns are as follows:

- 1.The Purpose and Need (P&N) is narrow and primarily focused on accommodating significant increases in levels of tourism use - not determining what is most sustainable. This P&N conflicts with the Forest Service's sustainable recreation policy.

- 2.Before a decision is made, a recreation use capacity analysis should be conducted, to determine social, physical, and biological carrying capacity of this area (including the lake and river), based on a wide spectrum of recreation users/uses. PAOT (persons at one time) physical design capacity is one factor; social carrying capacity, what people are expecting for their experience, is also a critical factor to know how to determine and manage for overall capacity.

3.The proposed scope and scale of infrastructure development (especially proposed facilities with a more modern design) will create an Urban ROS for a majority of the "prime areas" of the MGRA, adversely affecting the visual integrity and the character of the area, as well as the overall recreation experience for any visitor seeking a wild Alaska (which is how the tourism industry markets Mendenhall Glacier).

4.Boat use on the lake should be restricted to hand powered boats, with electric motors allowed on boats operated by outfitter/guides as backup in case of sudden winds or medical emergency.

5.All action alternatives as well as the no action alternative do not address managing use, only creating new (or maintaining current) infrastructure to accommodate increased tourism use. As part of this proposal, there needs to be a "plan for managing growth," collaboratively developed and implemented with the local community and users, the tourism industry, and other non-local users of the MGRA. "The Glacier," through cruise ship tourism, is a vital economic driver, especially for the community of Juneau, and for SE Alaska. What seems forgotten though, is that there aren't a lot of other options for locals and non-cruise ship visitors to go to, in lieu of the Glacier/MGRA, for a similar recreation experience. The MGRA has become intensely crowded, like many National Parks where visitation is now being limited (i.e., Glacier NP in Montana with ticketed entry). A collaborative approach to managing current and future use should be part of this effort (i.e., creating a citizen and industry advisory group that can monitor use/impacts and work with the agency to resolve and get out ahead of issues, similar to Citizen Advisory Groups for Congressionally designated National Recreation Areas).

6.The Agency has not addressed potential impacts and increased agency (i.e., taxpayer) liability due to injuries and fatalities that could occur from glacial outburst floods at the retreating Glacier face. Currently, glacial outburst flood events are tied to waters draining from Suicide Basin, with impacts limited to higher lake/river levels and localized flooding. However additional glacial melt water throughout the entire 12-mile Mendenhall Glacier basin/system could create different (i.e., glacier face ice wall collapse) and more deadly outburst flood event(s) in the future, as the Glacier continues to melt in the face of climate change. Any level of development created by the Forest Service that "invites" the public (including guided visitors) to a known hazard can result in increased liability, due to a legal "higher standard of care" that occurs. The rock peninsula on the west side of the MGRA should remain undeveloped (no docks, pilings, temporary welcome center, etc.), where self-exploration can occur and where users are in the area at their own risk. Temporary outhouses, such as facilities provided for remote recreation locations, should be provided to protect the area, due to the volume of people who will likely self-explore.

7.Before a decision is made, the level of Federal investment required for all infrastructure improvements, across all action alternatives, needs to be identified and disclosed to the public, including timeline and funding sources such as FLREA, special use permit fees, special appropriations, regular agency appropriations, partnership(s) with industry, the State, etc.

8.Before a decision is made, how long the Glacier viewing opportunities will be truly viable for each action alternative needs to be identified and disclosed to the public, to help determine "return on investment" per alternative. It doesn't make a whole lot of sense (or cents) to develop and invest taxpayer dollars in significant infrastructure and then have the Glacier no longer be in view. Which, in the short time window since I've been gone, has occurred amazingly (and sadly) fast. The Agency needs to remember and not repeat Portage Glacier/Begich, Boggs Visitor Center issues on the Chugach.

Thank you again for the opportunity to comment.

Sincerely,
Joni Packard