

March 2, 2020

My comments on the proposed changes in the MGRA as described in the February 20, 2020 scoping letter and material provided on the project website are below.

While much has changed since the 1996 EIS and Record of Decision, it is notable that the 1996 analysis foresaw several of the issues before us today. An EIS was completed because of the potentially significant effects that are arguably less in scale than the current proposal. The scale of the analysis and the interconnectedness of the various parts of the MGRA also likely had something to do with an EIS being the level of analysis. In addition, the notion of keeping the west side of the lake more remote has been a recurrent theme for decades of MGRA planning. For example, the 1996 ROD stated that the Desired Future Condition for the MGRA *“remain relatively undeveloped, allowing for concentrated use at the Visitor Center and Mendenhall Lake Campground, allowing for moderately concentrated use at the West Glacier Trailhead, Skater’s Cabin, and on Mendenhall River, allowing for dispersed, low to moderate use in the rest of the Recreation Area.”* [p. 3, ROD]. Even though the current proposal purports to be supportive of local resident conflicts, the shift is now clear: the west and south side are fully open for business.

### **National Environmental Policy Act (NEPA)**

In 1996, the entire MGRA was analyzed using an EIS. Since then, the area has had EA’s done for projects of a more specific and localized nature. The MGRA units have a lot of overlapping use, and while not all projects in the MGRA require an EIS, the magnitude of the physical changes, as well as the potential social effects across the MGRA with this proposal, may warrant one. The CEQ regulations [1508.27(b)(7)] states *“whether the action is related to other actions with individually insignificant but cumulatively significant impacts...Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts.”* [underlining added]

There are only two natural lakes on the Juneau road system (Twin Lakes doesn’t count). One of them is Mendenhall Lake and it is the only glacial outfall lake on the road system. It is unique in that regard. The CEQ Regulations state that significance may be triggered by *“unique characteristics of the geographic area...”* [36 CFR 1508.27]

The overall effects to visual resources may be potentially significant when you consider that the MGRA lakeshore is home to the only “drive-up” glacier in southeast Alaska and has the potential to significantly change the character of the lakeshore. The extent of the proposed changes include: three docks and related structures at different points on the lake, a lengthy partly-raised walkway on the south end (along with a 200-foot bridge), a Welcome Center that appears to be as large as the current visitor center, new structures at the more remote

northwest corner of the lakeshore, and boats regularly crossing the lake each day. Keep in mind, the existing lakeshore is largely undeveloped. That will substantially change with the proposed action. While all this development *may* be consistent with Forest Plan Scenery Guidelines, how do these structures affect the visitor experience?

Page 2 of the Master Plan states, “[v]isitation to Juneau is expected to grow 2-4% annually, with the potential for periods of much higher growth.” What does that growth level look like? To calculate the growth, I used the following numbers based on the scoping letter [p. 1] stating 700,000 people visited in 2017, and the Master Plan stating 500,000 commercial visitors arriving by motorcoach [p.14]. I’ve made a few assumptions, which I believe are conservative given that 6 percent has been used elsewhere.

(<https://www.alaskapublic.org/2019/09/18/even-more-cruise-ships-are-coming-to-alaska-in-2020/>). I assumed an annual growth rate of 4 percent, started with a total of 600,000 commercial visitors in Year 2020 (the average of 500,000 and 700,000 identified above), and used a 10-year period.

2020	–	600,000
2021	-	624,000
2022	-	648,960
2023	-	674,918
2024	-	701,915
2025	-	729,991
2026	-	759,191
2027	-	789,559
2028	-	821,141
2029	-	853,987
2030	-	888,146

This resulted in a 48-percent growth in commercial visitation. If just 10 percent of the visitors boat to the northwest portion of the lake in 2030, a very conservative estimate of 575 commercial visitors per day will step ashore there. That doesn’t include any other commercial use visiting via the new “spur” trail off the West Glacier Trail. Is this going to have significant effects on the visitor experience?

The July 2015 Decision Notice for the MGRA Management Plan Revision for Commercial Guide, Outfitter and Transport Services authorized specific levels of commercial use. How will that decision be affected by the facilities in this proposed action? Do the allocations remain the same? Do they go up? The whole purpose of the current analysis appears to be to accommodate additional visitor use (mostly use from increased cruise ship activity). There is no

mention what the effects are of this proposed action, if any, to the 2015 decision, despite the 2015 EA stating, *“The Proposed Action is not expected to result in substantial increases in overall visitation but would allow more opportunities for commercially guided visits”* [Summary, p. 1]. If the 2015 decision needs to be revisited because of this proposed action, does this constitute a connected action as identified in 36 CFR 1508.25?

### Visitor Use

The Master Plan states that one of *“[t]he common themes throughout the project were the need to protect the spaces that Juneau residents use...”* [p.6] It is not clear what local resident “space” is being protected since:

- the entire visitor center area is clearly geared to large-scale, non-local tourism;
- the West Glacier Trailhead area has been greatly expanded;
- the proposed elevated walkway along the southern edge of the lake will now open up a large portion of Dredge Lake and campground to additional non-local use;
- the more remote northwest portion of the lake will have non-local tourists arriving by boat and *“expands the ability of the area to accommodate **significant** increases in visitors...”* [p.6, bold added], placing new structures in an undisturbed part of the McGinnis Unit. The Master Plan states this *“will allow for better recreation opportunities near the glacier...”* [p.34]. Better recreation opportunities for whom? Certainly not for the locals who currently hike or kayak to this area precisely because it is not over-developed.

What is the new capacity of the MGRA if all the potential components are in place? The scoping letter focuses solely on the *built environment* changes, but there is little mention of the *social* changes other than *“[t]he number of visitors is expected to continue to increase in the coming years which could lead to further declines in visitor experience...if action is not taken to address the recreation **infrastructure.**”* [p.1, bold added]. As an example of information that would help the public provide meaningful comments, the scoping letter identifies boat docks, but there is no mention of how many boats would be crossing the lake daily, or how many people they would transport. This omission has implications on effects to the visual resource (multiple boats crossing the lake) as well as the visitor experience on the west side of the lake (a currently uncrowded experience).

There will be substantial changes to the recreation dynamic on the lake, particularly the western side of the MGRA. In the past, visitor activity was centered at the visitor center and the West Glacier Trailhead. Now, cruise ship visitors will be transported to the very “core” of what had previously been a Semi-Primitive Recreation Opportunity Spectrum (ROS) visitor experience (users meet less than 10 parties per day during 80 percent of the primary use season).

According to the MGRA Capacity Determination, *“Mendenhall Lake and River are managed for a Semi-Primitive classification with expectations for less crowded conditions with lower levels of development. Users may still meet up to 10 parties per day, but sights and sounds of human activity are lower than in the other ROS classifications at MGRA.”* [p.10]

In addition, the length of the commercial use season has increased from 123 days to 153 days. It used to start on May 15 and extend to September 15. Now, it goes from May 1 to September 30. [2014 MGRA Capacity Determination, p. 5]. This means local residents have not only dealt with growing numbers of tourists, commercial use has also expanded into the shoulder seasons used by local residents. Now, it has the potential to also encroach further on areas local residents use. It is worth asking the question again: how does this *“protect the spaces that Juneau residents use?”*

### **Timeframe**

The scoping does not mention the timeframe for the proposed work. Will the projects take place in some prioritized order? For example, will the docks and boats be the first project out of the docket? It seems plausible this would be the case because those costs would likely be less than required to construct buildings and related infrastructure. I assume the money for the boats would be paid by the tourism industry, which would speed the process.

### **Monitoring**

JRD has been monitoring trail use in the MGRA for since the 2015 Decision Notice. Has the capacity been fully allocated? If not, why are additional trails being built? Is use consistent with the Forest Plan ROS? What monitoring will be instituted to assess the effects of the proposed action?

### **Clean and Green**

The Master Plan states, *“These facilities and area developments will be energy and resource efficient, with the goal of meeting the Living Building Challenge.”* That is commendable but there is no mention of new, clean technology for the hundreds, if not thousands of bus, and boat trips to the area each year. The Master Plan is an aspirational document so it seems appropriate the Forest Service, which touts itself as a climate change “leader,” would emphasize this point.

### **Steep Creek and Bears**

I like the idea of decommissioning the platforms west of Steep Creek so the bears have habitat without people. At the same time, I’m concerned about the magnitude of the viewing platform construction along the bulk of Steep Creek and its impact on bears feeding along the creek.

### **Lakeshore Trail**

The Lakeshore Trail does have length and width information, but does not state how much of the trail will be elevated (The Master Plan does show the elevated portions). Nor is it clear why this trail needs to be so wide. Emergency vehicles likely won't be needed since the commercial guides already have motorized boats available in the event of an emergency. A four-wheeler could also provide emergency support on a narrower path. I don't believe the heavily used Nugget Creek Falls Trail is 14 feet wide, so it's not clear why the lakeshore trail would need to be that wide.

### **Dredge Lake**

The Master Plan identifies several new projects in the Dredge Lake area. This makes one wonder what is in store for Dredge Lake over the next 5-10 years as use continues to grow, and more commercial tours push for new places to bike and hike. Will a separate Dredge Lake EA be used to further reduce the potential significance of this decision?

### **Mendenhall Campground**

I wonder how the folks who have paid a fee to use the Mendenhall Campground are going to feel when the new trail bisects the campground. This trail could receive a tremendous amount of use and decrease the quality of their stay. It also has the possibility of creating greater exposure of camper's equipment to theft since people can more easily escape on foot or bicycle. Plus, the new parking lot will introduce more vehicular traffic.

### **What's the rush?**

I'm not a big fan of "chasing the glacier" to provide viewing opportunities. If that is going to be the goal, why not wait 5-10 more years when more of the glacier recedes, making the east side more accessible for commercial growth? For example, it won't be long before the glacier is no longer in contact with the lake. As more area opens up, the Forest Service can remain flexible in identifying safe locations on the east side of the lake to accommodate additional use.

### **The Good Stuff**

Several of the projects represent necessary improvements--most at the MGVC or close by. These include:

- fish viewing window;
- expanded trailheads along the Glacier Spur road;
- improved vehicle and pedestrian circulation;
- removing fish barriers.

## **Summary**

The proposed action is lacking in information, particularly projected levels of use, which hinders the ability to provide the full breadth of meaningful comments. The scoping letter nor the Master Plan provide information about acreage affected, wetlands impacted, size, dimensions or height of the buildings etc. One of the Master Plan's goals is: "*Resources are managed and protected to minimize the risk of being negatively impacted.*" [p.46]. While this may be true in some cases where there are physical impacts, it is not true in regard to all the social impacts. Moreover, the Decision Notice and EA from 2015 appear to be in conflict with aspects of the current proposed action.

The Forest Service is commended for taking a long-term view of the MGRA's management. That view needs to factor in many of the components identified in this letter. I also want to emphasize that I am not vilifying the cruise ship industry; however, this proposal tips the balance too far in the industry's direction. Let me know if you have questions about my comments or would like to discuss them. I hope all public comments will be posted on the project website in a timely manner. Thank you for the opportunity to comment.

*Ken Post*

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