

11 March 2020

MGRA NEPA
8510 Mendenhall Loop Road
Juneau, AK 99801

To Whom It May Concern,

I am a retired fish biologist and 38 year resident of Juneau. I also worked as a naturalist at the Mendenhall Glacier Visitor Center for three years. I have concerns about the Mendenhall Glacier Recreation Area NEPA plan.

The Mendenhall Glacier Recreation Area represents a valuable resource for educating the public about its unique natural setting, dynamic processes, and natural, historic and cultural resources. For those reasons please consider the potential impacts to those resources to ensure that renovation of the Mendenhall Glacier Recreation Area does not interfere with accomplishing the stated vision, mission, and goals of the Mendenhall Glacier Master Plan. In so doing, the US Forest Service in Southeast Alaska will lead by an example of how to facilitate recreational opportunities without jeopardizing long term sustainability of the very resources that attract visitors and local users.

Please give careful consideration to the following comments on the proposed Mendenhall Glacier Recreation Area Improvement Project, and my suggestions for improvements to the proposed Master Plan (Version Feb. 12, 2019):

Energy efficiency:

Given the nature of landscape changes, it is imperative that future renovation incorporates plans for utilizing alternative sources of energy to MGVC structures and improving energy conservation, especially heat. The Forest Service can become a leader locally in reducing carbon emissions and increasing energy conservation. The MGVC should continue its green programs which will set example for visitors throughout the world.

Reduce bird collisions:

Make new windows safer! On all new structures, bird friendly glass or treatments that mitigate window strikes must be incorporated. It is well known that the windows facing the gorgeous view of the glacier, lake, and mountains have received many, fatal window strikes. Up to a billion birds are estimated to die each year after hitting windows in the United States and Canada. A simple solution is to do all new construction with glass that incorporates film, paint, outdoor netting, or other means to make the glass visible to birds.

Glacier access development for watercraft:

The Master Plan proposes four docks to facilitate access to the glacier, falls, and other portions of the lakefront. There is no need to provide watercraft access to the waterfall; it can easily be accessed by the hiking trail. Consideration should be given to the growing number of hikers who use the waterfall trail and immediate surrounding area. Constructing a dock near the waterfall will reduce the quality experience available to hikers, most notably photographs of the Nugget Falls. Further, it does not appear that the USFS has fully considered how the public might use the docks for private boats, making the impact of dock development grow beyond the considerations of the current plan. Will the docks require permits? Can the USFS reasonably issue and control access to the lake?

The Master Plan provided little information regarding the use of powered watercraft. Gas-powered watercraft should not be allowed on the lake because of noise disturbance to nesting birds, mountain goats and other wildlife; and the risk of fuel spills and pollution.

Trails and infrastructure:

An increase in hardened trails in the area will effectively reduce essential refuge habitat for bears and other wildlife in the MGRA. I am concerned about increased encounters between hikers and bears; the risk of injury to hikers, and an increase disturbance to wildlife in general. New and improved trail construction anywhere should be accompanied by an education program to improve bear awareness and ethical wildlife viewing. Sensitive wildlife areas should be designated and within them a leash requirement for pets be instated. This will minimize the footprint of trails, and assure bears, especially sows with cubs, are not angered by loose dogs.

There are serious flaws with the proposed new Lakeshore Trail. This up to 12-foot-wide paved semi-motorized trail along the north shore of the lake would change the wild character of the shore, and remove key wildlife habitat and corridors, and cause disruption to campers paying to stay at Mendenhall Campground. Currently, a large section of the MGRA is nearly encircled by paved roads. Naturalists have observed that some of the best wildlife viewing is on along this proposed trail corridor, the remaining area that is not surrounded by a road. A walk to this area often yields high densities of tracks in the sand or snow: deer, bear, moose, wolf and more. Now, because the access is a single-track trail or a shore walk, the area is used by locals and more intrepid visitors but is not subject to thousands of users daily. Thus, it is a refuge for people seeking a quieter experience, as well as for wildlife. It is the *only area* with a glacier view that is not constantly bustling during visitor season.

The proposed plan does not give adequate consideration to dynamic processes and changing landscapes and its effects on infrastructure. Both the frequency and amplitude of flooding is projected to continue to increase along the Mendenhall Lake and River. Previous flooding events have already exceeded 100-yr floods, and glacial retreat, calving, and ensuing blockage of the Mendenhall River are increasing. It is clear that future access to lakeshore and nearby trails during the tourist season will be

affected as water levels rise and flooding becomes more and more pervasive. Likewise, beaver activity is constant in the recreation area. The natural process of wetlands creation benefits some wildlife, but also makes trail construction and management difficult and expensive. Vocal sectors of the public have repeatedly not been in favor of beaver removal. Limited USFS recreation funds could be wasted by constructing trails and bridges that ultimately will not last; or only serve for a limited season.

Management of seabird and shorebird nesting areas must be addressed. The shores of Mendenhall Lake provide nesting habitat for multiple nesting seabird and shorebird species. The unique habitat characteristics of the recently deglaciated area draw Arctic Tern, Glaucous-winged Gull, Herring Gull, Mew Gull, Wilson's Snipe, Killdeer, Semipalmated Plover, and Spotted Sandpiper. All these species are enjoyed by visitors and protected from harassment by international law. Considerations must be taken to assure suitable habitat remains for them and disturbance to nests is minimized.

In particular, Mendenhall Lake one of the few local nesting areas for the Arctic Tern, a species of conservation concern, and a favorite with visitors. Continued use by the terns is contingent on the USFS keeping human disturbance to a minimum. At present, this is achieved by seasonal marking and closures, monitoring, constant public education and well-marked trails to keep people from wandering into sensitive areas. Terns use shorelines and recently deglaciated areas, typically on flat sandy or gravel bench areas. They have a strong fidelity to nest in the same place annually; however, after decades, vegetation will grow too high, and they will move. In the case of Mendenhall Lake, historic movements of the birds have followed the receding glacier. Thus, the birds too must 'chase the ice' to stay in their specific habitat. As of 2019, terns nested near the Visitor Center, and also at a less-tracked location towards the glacier face. The map on page 30 of the floating dock and trail to a temporary visitor center appears to be less than 250 meters away from current tern nesting areas. If built today, this trail might violate the Tongass National Forest management guidelines for development near seabird colonies. It is imperative that all new development and maintenance of trails and facilities be constructed well away from nesting birds, and that an aggressive program is in place to avoid incursion by people and dogs to the colony areas from existing ones. It is also important that new facilities and trails do not cover up or make accessible to foot traffic all potential habitat (flat sand or gravel bars near the glacier). Finally, waves from boat wake can make natural flooding even more hazardous to birds who nest close to the shore.

Sincerely,

Brenda Wright

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