

These comments were previously submitted to USFS in connection with EIS for Tongass Management Plan. They are also relevant to Visitor use of the Recreation area.

My comments regarding the Tongass Management Plan concern helicopter landings on the Juneau Ice Field. The agency's goals and priorities as stated in the USDA Strategic Plan, the USFS Roadmap for Responding to Climate Change, the USFS Global Climate Change Research Strategy and the Tongass Management Plan pledge to:

- Reduce greenhouse gas emissions
- Reduce the agency's environmental footprint
- Engage partners in seeking solutions to climate change
- Integrate sustainable consumption activities into daily decision-making, planning and operations
- Address climate change in planning and analyses

Nowhere are the effects of climate change more massively obvious than in the shrinking of Juneau's Mendenhall Glacier and the thinning of the Juneau Ice Field. An estimated hundreds of thousands of gallons of fuel are being burned by helicopters, resulting in millions of pounds of CO₂, every year, to bring tourists to view the ice field. Fleets of 5-6 (not 1-3 as stated on page 3-336 in the EIS) helicopters are bringing passengers to the Ice Field nonstop in flyable weather during the cruise ship season. Table 3.15-12 provides only an estimate of the number of landings, even though there are a fixed number of permitted landings per season, begging the question of how well the Forest Service is monitoring landings and enforcing the permits. The Forest Service acknowledges on page C-18, table C-2, their own responsibility for environmental impacts from helicopter landings, saying "This action is likely to grow in the future if the Forest Service allows it."

The Mendenhall Glacier Visitor Center is heavily investing in rebranding itself as a living exhibit of and public education on climate change. This portrays the Forest Service in a positive light as a proactive agency in the effort to combat climate change. Surely the irony is not lost on the agency that on one hand it is using the Mendenhall Glacier as Exhibit A on the obvious effects of climate change, while at the same time permitting one of the highest emitting activities possible to take place on top of the very same glacier.

As more and more low-carbon activities have become available, the USFS should encourage those activities and discourage high-emitting activities such as heli-tourism. If transporting tourists to the top of the ice field is a priority, seek out a low-carbon alternative such as an electrically powered tram that uses carbon-free hydropower, which might eventually be generated from the hydropower facility being proposed to power operations at the visitor center, perhaps as a public demonstration of using Forest resources to produce local renewable energy.

Due to advancements in the knowledge of and sensitivity to greenhouse gas emissions, the agency should perform a new EIS under the National Environmental Policy Act prior to issuing any new special use permits. An immediate assessment should be made of the actual scope and magnitude of the heli-tourism activity. This assessment is warranted due to the imperative to account for greenhouse gas emissions resulting from an accurate count of actual landings, which by the Forest Service's account they have only estimated and which they expect to see increase in the future. Additionally, new housing developments in the limited buildable land space in Juneau, most notable in the Heintzelman Ridge area, Auke Bay, Montana Creek and a large planned affordable housing development on Pedersen Hill greatly increase the negative impacts on the human environment.

I am asking the Forest Service to consider "Telling Its Story" by filling "Its Role in Addressing Climate Change" (Tongass Management Plan implementation priorities #2 and #5) by virtue of its authority to limit special permits for helitourism on the Juneau Icefield.

* The Forest Service should review the number of helicopter landing permits should be allowed