**Primary Comment**

The proposed actions in alternatives 2, 3, and 4 fail to meet the first bulleted objective on page 29 (Section 1-6) of the DEIS Vol. 1, as taken from the objectives for Special Interest Areas on the Tongass (see Tongass Forest Plan, p. 3-39):

“Provide opportunities for public study, use, and enjoyment of unique natural areas that are suitable to, and do not compromise, the characteristics of each area.”

The key phrase here is “and do not compromise.”

The problem lies in the stated purpose, which is to “accommodate projected future visitor use while protecting the unique characteristics and outstanding beauty of the area.”

The stated purpose is fatally flawed. It is simply not possible to protect the unique characteristics of the area while at the same time accommodating the huge increases in the number of visiting tourists if we do not see significant changes in the carbon budget of the visitor industry. And that is not to mention that the overall experience is likely to be worsened by increased crowding, despite the best design efforts.

The Mendenhall Glacier, which is THE unique characteristic of the area, is receding due to greenhouse gas warming, primarily caused by the burning of fossil fuels. The plan to accommodate an increasing number of tourists is a plan that enables greater carbon emissions. The cruise industry, including the ships and buses, are dependent on burning fossil fuels, and this exacerbates the climate crisis. To get to Juneau, the tourists come to Juneau in huge carbon spewing ships, and then they are driven to the MGRA in diesel buses spewing stinky carbon-laden exhaust. On top of this there will be an increase in black carbon particulate emissions which contribute to glacier melt.

Simply put, the unique characteristics of the area will be compromised.

Until the visitor industry cleans up its carbon intensive operations, the purpose should not be to accommodate projected future visitor use. The USFS should not be in the business of enabling an expansion of the carbon-intensive business-as-usual scenario. If the cruise industry was somehow an “essential service” there might room for accommodation; however, the cruise industry as it exists in Juneau is discretionary travel with excessive emissions. These emissions are identified in Chapter 3 of the DEIS Vol. 1.

The cruise industry has the wherewithal to purchase electric buses and supporting infrastructure to eliminate the use of tourist buses burning fossil fuels in Juneau. As to the industry’s reliance on fossil fuels to power their ships, it needs to accelerate the transition to carbon neutral shipping.

It’s really a matter of priorities and waking up to the seriousness of the climate emergency we are living in. The first priority for the USFS should be a rapid transition to carbon-neutrality. Accommodating more tourists to meet the business plans of the visitor industry is way down the list. The tourist industry is a hungry beast and it will always want more.

For this reason, I object to any increases in parking for buses in any of the affected scenarios, and any substantial increases in infrastructure designed to accommodate projected increases in numbers of tourists, such as the Welcome Center Complex.

**Other Specific Comments**

It is unlikely that commercial boating across the lake can be accommodated without negative impacts on nesting gulls, terns and shorebirds, as discussed on page 3-31. Once such operations are permitted, it will be difficult to “mitigate” the impacts, let alone ceasing those operations. For this reason, commercial boating across the lake should only be attempted, if at all, on a small scale pilot project basis with an evaluation of impacts and a clear decision rule for halting further commercial boating if detrimental impacts are observed.

Thank you for this opportunity to comment.