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Mr. Stewart

Juneau Ranger District

US Forest Service

Mr. Stewart

I appreciate the opportunity to provide comments on the Mendenhall Glacier Visitor Facility Improvements Project Draft Environmental Impact Statement (DEIS). It is difficult to understate the level of skepticism with which this DEIS has been met by a large number of Juneau residents. The clear objective of this project is to dramatically increase commercial allocation of a protected public resource. When commercial allocation was increased in the 2015 Management Plan Revision, the USFS included as mitigation an adaptive management plan that promised to *reduce* commercial use if Forest Plan standards and guidelines were not being met. USFS further promised to

*contact the Forest Sciences Lab in Juneau to ascertain monitoring options (questions, design, and assessment tools) to better understand displacement of local residents who wish to recreate in the MGRA*

This followed similar promises to balance the competing interests of commercial and private recreation that were made in earlier environmental documents that gave increasing larger allocations to commercial vendors. There is no evidence that this mitigation was ever implemented or, if it was, that the results were used for any deliberations on how the MGRA should be managed.

Ironically, we should perhaps be relieved that the USFS is no longer operating under the pretense that any such balance can be struck, despite the directive in the Tongass Land and Resources Management Plan (TLRMP) that compels the USFS to do so (TLRMP 4-47). The Purpose of and Need for Action section and the Purpose and Need statement in the DEIS make no allowance for visitation or MGRA use outside the tourism season, and the Purpose and Need Statement goes so far as to directly state that the project is designed to “meet the demand from the visitor industry.”

It is not only Juneau residents and independent travelers that that are impacted by the USFS’ proposed sale of a public good to a small group of private entities. The very nature of the MGRA is proposed to be fundamentally altered, urbanized, and degraded from its special status as a place of unique natural beauty largely undisturbed by human uses. All in an effort to avoid confronting the realities of climate change and the retreat of the Mendenhall Glacier that is being exacerbated by, among other things, the buses and vehicles and motorized vessels that the Proposed Action support. It is recognized that the USFS is not by nature an environmental protection or conservation-based agency, but the USFS as a whole has appeared to step up to the challenge of balancing commerce with sustainability and environmental protection. If the Proposed Action is implemented, the MGRA will be a glaring exception to this.

In keeping with the designation of the MGRA as a Special Interest Area, and in light of the comments below, I support the following combination of alternatives:

* Welcome Center, Visitor Center and parking design from Alternative 4
* Dredge Lake Trail actions and commercial capacity from Alternative 4
* Visitor capacity for Visitor Center Unit from Alternative 4
* Visitor capacity for other units and trails from Alternative 1
* Lakeshore trail from Alternative 1
* Public use cabins from Alternatives 2-4
* Nugget Falls trail expansion from Alternative 1
* Steep Creek Habitat restoration from Alternative 2
* Steep creek trail expansion from Alternative 4
* Boat docks and relative facilities from Alternatives 1 and 4
* Remote Visitor Center and associated facilities from Alternatives 1 and 4
* Management Unity boundaries from Alternative 4
* Forest Orders except nighttime closures in winter from Alternatives 1-4

**GENERAL COMMENTS**

**Special Interest Area**

The DEIS seeks to update infrastructure and create recreation opportunities at the Mendenhall Glacier Recreation Area (MGRA) in Juneau, AK to accommodate projected future visitor use while protecting the unique characteristics and outstanding beauty of the area. As noted in the DEIS, the MGRA is named as a Special Interest Area (SIA) in the Tongass Land and Resources Management Plan (TLRMP). The DEIS selectively identifies the desired condition for the SIA from bullet 2 on TLRMP page 3-39 without also including that these locations are, by definition:

Characterized by *generally unmodified environments in which unique natural features are preserved. They remain largely undisturbed by human uses or activities*, except for *localized* interpretive purposes and, in some cases recreation developments…..(emphasis added, page 3-39).

The level of development proposed in Alternatives 2, 3, and to some extent 4 are inconsistent with allowing the MGRA to continue to meet the standard of being “generally unmodified” and “largely undisturbed.” The MGRA is a small park, and Figures 2-9 through 2-11 in the DEIS show the area crisscrossed with road-width (and in some places paved) trails and bridges, boat docks, buildings, and parking lots. The proposed modifications go well beyond “localized” interpretation and development and involve fragmentation of habitat, and disturbance and displacement of wildlife.

DEIS Alternatives 2 and 3 are designed to “disperse” visitors over the MGRA. This is inconsistent with the SIA desired condition to have the area remain largely undisturbed except by ***localized*** interpretation and recreation developments.

The TLRMP is clear in stating that “***All*** Special Interested Areas in the Tongass National Forest” are characterized as described above, and as such they cannot remain as SIAs unless they maintain that character. The USFS is not able to change the designation of the MGRA through this DEIS. In addition, the TLRMP objective for SIAs provides for *existing* recreation opportunity spectrum (ROS) opportunities (3-39). Dramatically expanding ROS activities in ways that would substantially impact the natural features of the SIA is not compatible with the SIA designation. The TLRMP is prescriptive: proposed actions that do not align with the TLRMP must either be changed, or the TLRMP must be changed before they can be implemented. Actions from the proposed alternative and other alternatives that threaten the MGRA’s SIA status include:

* Changes to ROS designations for trails
* Changes to MGRA unit boundaries
* Motorized watercraft and associated infrastructure
* Remote visitor center and associated infrastructure
* Lakeshore trail and associated developments including pedestrian bridge
* Trails wider than 5’ (Hiker/pedestrian non-wilderness class 5)

**Selectivity and bias**

The USFS has selectively focused the DIES to favor the development and enhancement of commercial uses of the MGRA over the interests and benefits of other users (e.g. independent travelers and local residents). This has resulted in misrepresentation and distortion of MGRA use statistics and foreclosed or seriously limited the consideration of alternatives as required under 40 CFR 1502.2(b)(3) and 102(2)E of NEPA. A review of the project record shows that conflicting commercial and private recreational uses of the MGRA were discussed only briefly early in the project development process (June 4 and 5, 2019, R10\_MB\_840\_0174):

 “Number of visitors during the summer months is predominately tourists. Number of visitors during the fall, winter and spring is predominantly locals”

and dismissed by the following quote:

*Where conflicting interests must be reconciled, the question shall always be answered from the standpoint of the greatest good for the greatest number in the long run.* (Sec of Agriculture James Wilson, Feb 1, 1905)

The USFS has an obligation under both NEPA and the TLRMP to develop alternatives that address unresolved conflicts concerning alternative uses of available resources (40 CFR 1501.2(b)(3) and to reduce recreation user conflicts and polarization (and) work with affected publics in finding solutions to defuse or resolve conflicts or concerns (TLRMP 4-47). Yet, from the beginning of the master planning processes the UFSF has focused on developing recreation opportunities that would primarily benefit a small number of commercial operators. Contrary to prior NEPA decisions regarding the MGRA, the USFS has without justification developed alternatives that expand commercial use into areas that have historically been used primarily by independent travelers and residents. This does not meet the requirement of finding “solutions to defuse or resolve conflicts.” While the TLRMP encourages tourism development and support to local economies, it does not elevate these objectives above those of other users.

The USFS has misrepresented the magnitude of commercial use and need in the MGRA by conflating visitation numbers at the visitor center proper with use of the MGRA as a whole, and this has biased the development and selection of alternatives. Usage data for special permit holders in the summer of 2019 indicates that 84% of guided visitors remained at the visitor center, and that the percentage of guided visitors using the trails discussed in the DEIS ranged from 0.3% to 3.3%. In contrast, summer trail monitoring from 2017- 2020, which was performed as mitigation for the 2015 increase in commercial allocation, indicates that **guided groups using the trails consistently made up less than 20% of trail users**. In every year, with the exception of the Steep Creek Trail in 2019, **groups of Juneau residents comprised a higher proportion of the trail users during the summer tourist season.**

Despite these facts, the USFS included only commercial operators and excluded Juneau residents from the analysis to help inform the design of recreational and interpretive facilities. The analysis states: “Emphasis was placed on commercial users, reflecting the significance of the MGRA as a visitor attraction” (page 1). Juneau residents have been afforded unequal access to the DEIS development process, being limited to providing comments during public comment opportunities. Although large numbers of Juneau residents are substantially opposed to many aspects of the project, their input carries less weight in the development of the proposed alternative than a handful of commercial tour operators. This biased approach to development of the preferred alternative undermines the USFS’ credibility a creates a credible claim that the decision-making process is prejudiced.

**Purpose and Need**

To evaluate whether an alternative meets the stated Purpose and Need to “meet the demands of industry” the USFS must identify what those demands are and where they are. Determining whether the scale of an alternative is appropriate requires a quantifiable metric against which it can be measured. The USFS has provided no such information regarding industry demand or needs. This information should be readily available in the form of 1) needs assessment (FSH 2709.14), 2) requests for additional commercial capacity for specific guiding activities, 3) data on actual commercial use in areas where commercial allocations exist, 4) requests for new or expanded access, 5) surveys or other data collected to assess demand for the MGRA in the context of other tourist activities.

A well-defined purpose and need statement ….. describes in detail why action is being proposed **in that location and at that time** (FSH 1909.15)

The purpose and needs statement in the DEIS does not meet this standard. Increased commercial capacity is being proposed in areas where there is currently unused commercial quota (see Trails below) and where “demands from the visitor industry” are therefore presumably already being met. The DEIS alternatives require detailed descriptions of why specific actions are being proposed and how they meet demands, not just abstract growth projections.

**Capacity Increases, Growth and Commercial Allocation**

The use of a 2% linear growth projection for determining MGRA capacity and commercial allocation limits is flawed on a number of points. First, visitor growth does not occur linearly. The large increase in the number of cruise ship visitors in 2019 resulted from four larger cruise ships replacing smaller ones, and the ability of cruise ships to anchor in the harbor. Under the current physical capacity for cruise ships in Juneau, the Cruise Line Association of America is predicting a plateauing of passenger increases in the next two year (Juneau Empire 12/2/19). As such, accommodating year over year capacity increases for 15 or 30 years are highly unrealistic.

The USFS has failed to evaluate readily available and well publicized information in its capacity analysis. This includes recommendations from the Juneau Tourism task force that favored limiting cruise ship infrastructure to a maximum of 5 large ships (over 500 passengers) per day, and eliminating hot-berthing and anchoring[[1]](#footnote-1). A phone survey of Juneau residents in November 2021 found that 63% of Juneau residents favor limiting the number of cruise ships, with 54% or respondents advocating less than 5 ships at any one time[[2]](#footnote-2). And finally, when deliberating on allowing Norwegian cruise lines to construct a cruise ship dock at the subport, legislators kept open the option to prevent hot-berthing and anchoring.[[3]](#footnote-3) If anchoring and hot-berthing are prohibited, growth in the number of cruise ship passengers could only come through increasing the size of vessels, and Juneau’s infrastructure is limited in that respect. Information included in the project record indicates that **the USFS is aware of the highly speculative nature of the projected visitor count in Alternatives 2 and 3**.

*The projected visitor count (*of 922,717 visitors) *for 2039 is not possible unless additional cruise ship berths are constructed in Juneau. If a new 2000 passenger berth were constructed at Subport, then the 2039 projections are possible, but that would still have all berths filled and all ships completely filled on a maximum day. Given the major economic downturn currently underway, should we us these projections for 2039 or should we base projections on maximum current berthing capacity in Juneau, which would take us to year 2034 using a 2% growth rate* (784,0301 visitors)*? (*R10-MB-840-0205)

It would be an egregious misallocation of taxpayer money to proceed with a project based on these highly speculative and unlikely visitor projections.

**Increasing commercial allocation**

In developing capacity increases for the MGRA, the USFS is operating under the erroneous assumption that it must or even should meet the perceived demand for additional commercial tour days. There is no such requirement in the TLRMP, the Forest Service Mission, or any USFS guidance. Reasonable capacity increases can be accommodated while leaving commercial allocation alone or making moderate adjustments. By the USFS’s own analysis, this would not have a significant economic impact on commercial operators, the tourism industry, or the SEAK economy. In excluding independent drive services from dropping passengers at the MGRA in a 2021 directive, the USFS stated “The JEDC reported $103,225,389 in leisure, hospitality, and transportation industry earnings (i.e. tourism revenue) for Juneau during 2019….Thus not doing business at the Visitor Center does not equate to not doing business in Juneau, for ether large or small entities.” There are tourism opportunities in Juneau and Southeast Alaska other than the MGRA, and many of these (e.g. the National Park Service in Glacier Bay) also need to make reasonable limits to capacity to maintain the quality of the recreational experience.

In the Market Demand and Economic Analysis report, tour operators reported that while seeing the glacier is important to visitors, “many vantage points in the community provide Mendenhall views including North Douglas and onboard fishing charter and tour vessels.” This suggests that demand that is not met by the MGRA can be met elsewhere in Juneau and that *not* meeting tourism industry demand will have a minimal impact on Juneau tourism and economy. **The DEIS has not adequately addressed the value of the MGRA and the scale and scope of the proposed improvements within the context of the larger economy, and therefore has not justified the singular focus on commercializing a public resource**.

**Incorrect Trail Capacity Designations**

In the 215 MGRA Management Plan Revision, the USFS implemented a trail monitoring plan as mitigation for increasing commercial trail allocations in the face of substantial opposition from local users. The purpose of this monitoring was to provide the USFS with actual usage information on number of groups and people encountered at one time (PAOT) to adaptively manage, or right size, trail encounters and uses. The ROS Standards and Guidelines in the TLRMP identify the number of *groups* that may be encountered within ROS classes, but does not identify the number of persons within the group (I-4) except to set maximum allowable group sizes for the Wilderness and semi-primitive roadless areas outside wilderness (TLMP 4-44). The TLMP advises that group sizes for other ROS settings

Consider site capabilities and impacts to other users and resource values to establish party size limits

In the DEIS, the USFS used a party size limit of 12 people as the basis for calculating capacities for trails in the MGRA. **The USFS should justify why the number 12 was chosen when the average number of people in groups from monitored trails from 2017 to 2019 ranged from 2 to 4 people.** Using 3 people per group results in a capacity for the Roaded Natural ROS of 7,334 people. This is, unsurprisingly, the same capacity specified in the 2015 revision to the MGRA management plan, and suggests that a method for considering more realistic site capacities for the MGRA existed at the time that document was published.

**The USFS should set the groups size for determining trail capacity using the data it has collected for this purpose** not an arbitrarily chosen number with no apparent relationship to site specific capacities and use. There are several ways this could be done to allow a reasonable capacity increase. Since guided groups tend to be larger than the overall average of monitored groups, one method would be to evaluate the average size of guided and non-guided groups separately, and apportion them to the calculation based on the ratio of guided to non-guided groups in the collected data. For the Roaded Natural ROS, this calculation would look like:

Guided: 10 people per guided group X max 20 parties X 153 days (80% of use time) X 0.8 (number of hours of use divided by 12 hours in a day) X 0.17 (the maximum proportion of guided groups)

Non-guided: 3 people per non guided group X 20 parties X 153 days (80% of use time) X 0.8 (number of hours of use divided by 12 hours in a day) x 0.83 (the proportion of non-guided groups)

Capacity = guided + non-guided = 10,257 for the Roaded Natural ROS.

Similar calculations could be done for the other ROS categories and for each monitored trails separately; however, prior to revisiting capacities the USFS should evaluate the level to which existing commercial allocations are being utilized. Adaptive management, as implemented with the 2015 MGRA Management Plan revision, requires allocation decisions to be made on information and data, not whim. Alternatives 2 and 3 of the DEIS propose changes to the ROS designations for several trails within the MGRA. The proposed changes fail to take into account existing unused allocated capacity, or capacity currently remaining after use.  **Review of commercial use of MGRA trails from 2006-2021 shows that several trails with proposed increases in commercial allocation are being used at levels well below their existing allocation.** In 2019, with the exception of the Trail of Time, the percent of currently allocated use ranged from 25% to 88%. Applying the 2% annual growth projection to these trails using 2019 use resulted in a timeframe to reach *existing* capacities from 6 to 69 years. Applying commercial allocations proposed in the DEIS to 2019 visitation, it would take between 29 and 72 years to reach the commercial capacities proposed in Alternative 2 (see table).



Trail monitoring data from 2017 through 2020, as shown in table 3-17 of the DEIS, does not support proposed changes in ROS designations under Alternatives 2 and 3 based on encounter rates. Percentages above zero in table 3-17 generally represent only one or two days of exceedance during the three months of monitoring. ROS definitions clearly state that encounter rates are levels are ***per day*** at least 80% of the time. A single exceedance does not justify a change to the designation.

As specified in the DEIS, the capacity limits for trails in the MGRA are not only inaccurate but also absurd. Capacity remaining after commercial allocation, which is presumably available for use by residents and independent travelers exceeds the entire 2020 population of Juneau, AK by as much as 460%. Clearly, this cannot reflect the consideration of site capabilities required in the TLRMP.

**Dispersing Visitors**

The DEIS states, without justification, that developing trails and increasing their commercial capacity will help to “disperse” visitors throughout the MGRA. Historic data and information the USFS collected from the tourism industry during the development of the DEIS suggest this is unlikely to be the case. MGRA Visitor **data from 2006 through 2019 shows that between 93% and 97% of the visitors do not leave the Visitor Center Unit** (MGRA Commercial Use 2006-2021)**.** In 2019, 71% of the permitted commercial vendors operated in the Visitor Center Unit and 84% of the visitors remained at the visitor center with fewer than 7% visiting any of the trails within the Visitor Unit (2019 permit holder use data). Only 10% of the total visitors to the MGRA visited any area outside the Visitor Center unit. Since most visitors spend between 75 and 90 minutes at the MGRA (Demand analysis page 9) there is little time to disperse beyond the visitor center and close trails (Photo Point and Steep Creek). **The USFS has provided no compelling argument for why these long-standing patterns of use would change under the proposed alternatives.**

**Adaptive Management Strategy for Commercial, Outfitter, Guide and Transportation Services**

Adaptive management strategies have been included as mitigation in prior MGRA Decision documents, but the USFS has provided no evidence to support this approach as a viable mitigation option. The USFS should discuss the implementation, successes and challenges of past efforts. This discussion should include documentation on how past adaptive management mitigation has been implemented, including references to the adaptative management plan(s) that were developed, management and monitoring reports, and communications with the public on management actions, findings, and decisions. This discussion should also include information on how prior adaptive management efforts were incorporated into the decision-making process for the DEIS and Master Plan. **Adaptive Management as a mitigation strategy should not be pursued unless the USFS can document that adaptive management and other mitigation commitments from prior decision documents have been implemented and used for their specified purpose.**

It should be noted that trail use monitoring reports from monitoring included as mitigation in the 2015 MGRA Management Plan Decision were identified in the references to the DEIS as “internal documents.” These documents had to be requested from the USFS during the DEIS review period.

In lieu of adaptive management, the USFS should convert this DEIS to a programmatic DEIS from which future actions could be tiered via other NEPA analyses at appropriate times.

**SPECIFIC COMMENTS**

**Alternatives considered but eliminated**

East Side Development Only

“Even with the added facilities, this concept would impact all users’ experience if visitors cannot disperse over the MGRA”

The vast majority of visitors currently do not disperse over the MGRA (see Dispersing Visitors, this letter), and the USFS has provided no compelling argument, or any argument at all, for why that is expected to change. In the market demand report, tour operators were most supportive of trail enhancements near the visitor center (east side) emphasizing that with 60 to 90 minutes total time at the MGRA primary visit locations would be the visitor center, Nugget Falls, Photo Point, and Steep creek. West Glacier unit trails appeal to a very small subset of the vendors, but many areas in this unit are already over-allocated to commercial vendors who do not use the time they are currently allotted.

The USFS should revisit this decision to better align with the requirements in the TLRMP for Special Interest Areas. The TLRMP desired condition for Special Interest Areas is for them to “remain largely undisturbed by human uses and activities, except for ***localized*** interpretive purposes, and, in some cases, recreation developments (3-39)” Limiting development to the East Side would meet this require for localized interpretation and development by limiting urbanization to areas adjacent to the visitor center and the highest concentration of visitors.

**Regulatory Setting**

Section 3.6.2.2. should reference the 2016 Tongass Forest Plan sections pertaining to Special Interest Areas (3-39) specifically the desired condition.

The remainder of the Desired Future Condition for the MGRA from the 1996 MGRA Management plan should be added to the excerpt in Section 3.6.2.3

Primary emphasis is to be placed on protection natural resource values with human recreation needs. The agency’s overall vision for the Recreation Area is for the area to remain relatively undeveloped, allowing for *concentrated* use at two specific sites (the Visitor Center and the Mendenhall Lake Campground), moderately concentrated use at three sites (West Glacier Trailhead, Skater’s Cabin, and Mendenhall River), and managing for dispersed ***low to moderate*** use in the rest of the Recreation Area

**Glacier Spur Trailheads**

The USFS has not addressed security issues associated with these trailheads and identified during the scoping period. There numerous instances of people parking overnight, sleeping in vehicles, and abandoning vehicles in existing trailhead parking lots during the non-commercial season. In the majority of instances, abandoned vehicles have remained in these lots or along the roadside leading to the visitor center for a month or more. The proposed trailheads would introduce hikers with access to vehicles into trails adjacent to private land and houses, creating a potential for increased crime. The USFS needs to address security for the trailheads and associated trails.

**Associated Actions Common to All Action Alternatives**

Adaptive management plan

The USFS should address how this plan complements or differs from the adaptive management plan presumably implemented as mitigation in the 2015 MGRA Management Plan Revision. Evaluations and actions from the existing adaptive management plan should be discussed, and there should be a discussion of how the existing management plan was used to inform the development of action alternatives in this DEIS.

Closure of MGRA Recreation Areas

The proposed closure of the MGRA from 10pm to 6am does not specify whether this closure applies only to the tourism season. The MGRA is a popular location for viewing the northern lights in winter, and this action would foreclose viewing at several times during the year. The USFS should address the rationale for this action and the impact on MGRA users.

**Remote Glacier Visitor Center, Motorized Watercraft and associated facilities**

As previously stated, the proposed remote visitor centers are not consistent with the requirement that the MGRA Special Interest Area remain largely undisturbed except for localized development and recreation (TLRMP 3-39). Motorized watercraft are also not compatible with this provision and would further introduce turbidity, erosion and pollutants into a pristine glacial lake. This portion of Alternatives 2 and 3 has very little support from either the local or commercial users of the MGRA. According to information in the project record, large tour companies, which represent 75% of the MGRA commercial usage are not interested in this aspect of the project (R10-MB-840-0205) and there are extensive public comments opposing these actions. If implemented, these actions would benefit a very small number of commercial vendors (2 to 3) and would completely erode the USFS argument that actions in the DEIS are designed to serve the largest number of people.

**West Glacier Unit Trails**

The blasting and new trail construction required for this action is not consistent with the requirement that the MGRA Special Interest Area remain generally unmodified and largely undisturbed (TLRMP 3-39).

**Management Unit Boundary and ROS adjustments**

The proposed actions in this section are not consistent with the requirement that the MGRA Special Interest Area requirement to provide for *existing* ROS activities and opportunities (TLRMP 3-39).

**Lakeshore Trail including bridge**

The size and nature of the new trail construction required for this action is not consistent with the requirement that the MGRA Special Interest Area remain generally unmodified and largely undisturbed (TLRMP 3-39).

**Section 3.7 Recreation and Visitor Experience**

Consistency with the TLRMP, re: Special Interest Are: The USFS has omitted references to ***localized*** development and recreation; unmodified environments; remaining largely undisturbed by humans.

“Visitor capacity is determined by observations and judgements of forest service staff..” Visitor capacity should also be determined using data collected on trail use, the adaptive management plan, and results of consultation with the Forest Sciences Lab in Juneau to better understand displacement of local residents, which were all included as mitigation for the 2015 MMGRA Management Plan Revision. USFS should revise this section to better explain how these required actions factored into the DEIS.

“Amendment of the Forest Plan would not be required to update ant ROS classes within the scope of this project.” The TLRMP objective for Special Interest Areas provides for *existing* recreation opportunity spectrum (ROS) opportunities (3-39). Dramatically expanding ROS activities in ways that would substantially impact the natural features of the SIA is not compatible with the SIA designation. The TLRMP is prescriptive: proposed actions that do not align with the TLRMP must either be changed, or the TLRMP must be changed before they can be implemented.

“Visitor use and demand for visitor services at the MGRA has increased since the last MGRA management Plan revision in 2015. Current visitor demand already exceeds the area’s capacity.” Commercial permit holder data from 2019 indicates that visitor demand only exceeds existing capacity at a few locations: the visitor center proper, the Moraine Ecology Trail and the Steep Creek Trail. The USFS has consistently conflated, in direct contradiction to available, USFS-collected data, demand for these three areas with demand for the MGRA as a whole. This is inconsistent with the requirement of 40 CFR 1502.23 for the USFS to use existing data and resources in the development of the DEIS

3.7.5.1 Number of Social Encounters

The analysis in the section is flawed because it is based on incorrect levels of capacity increase (see Incorrect Trail Capacity Designations, this letter).

**Socioeconomic and Environmental Justice**

3.12.2.2. Consistency with the 2016 Tongass Forest Plan

Tourism is only one aspect of the Recreation and Tourism Forest-wide Standard and Guidelines (TLRMP 4-41), there is nothing to suggest that the USFS intended it to take primacy over other uses. By focusing on tourism over all other TLMP requirements, the USFS is using a biased process to develop and evaluate recreation options. To this section, and its analyses, the USFS should add

REC2(I)(C) – Cooperate with ***local*** communities and user groups when implementing recreation projects (4-41)

REC2(II)(B) – Identify opportunities to enhance existing, and provide additional recreation activities, opportunism and services where desirable to mee ***local*** or Forest-wide recreation demands. Give particular attention to opportunities that….***.are important to local users***

REC2(VII)(B) – Identify those recreation uses that may be in conflict with each other. Reduce recreation user conflicts and polarization. **Work with affected publics in finding solutions to resolve conflicts or concerns**.

As noted on page 2-56 “The MGRA and associated infrastructure was developed using Federal dollars.” As such, it is owned by all citizens. The rationale for favoring one set of users over another needs to be justified, not merely ignored.

2.12.3 Issues and Indicators

Add a measurement indicator to meet the TLMP requirements under REC2(VII)(B) to find solutions to resolve conflicts or concerns.

GENERAL COMMENTS – SOCIOECONOMCS

The traffic volume analysis indicates that Alternative 2 would results in an average of 120 buses per day and therefore have a negligible effect on traffic. However appropriate level of service (LOS) analysis requires accurate traffic estimates by day and time at various locations along the transportation route. The percent of increased traffic on the Glacier Spur Road, after the turn for Mendenhall Loop should be considered as a separate area. Identifying differences in peak traffic will result in a much different level of impact than using averages. Averages also misrepresent the impact of daily use for peak periods. For example, the alternative comparison table (2-62) indicates that there may be “as many as 30 buses per hour during peak use.” If there were three hours of peak use (90 buses), then there would either be only 30 buses over the next 7 hours or traffic volumes for the day will substantially exceed 120 total buses. It is these peak volumes that need to be evaluated for safety, localized environmental impact, and noise. Buses and other vehicles transiting to the MGRA pass through four school zones. The USFS should address peak volumes during periods when schools are in session.

The DEIS is missing a discussion and analysis of impacts from the actional alternatives on sewage treatment infrastructure. The MGRA is served by the Mendenhall Treatment Facility which has been received numerous wastewater citations in recent years. Facility upgrades are financed through enterprise funds funded primarily by property taxes. As mitigation for increase visitor development, the USFS should provide funding to upgrade wastewater treatment.

1. https://juneau.org/index.php?gf-download=2021%2F02%2F2021-01-07-VITF-final-report\_COW.pdf&form-id=22&field-id=11&hash=83992e0039a6bc1109b1006f00104c9a6a6ec5345e1d4b4e79575e9b992a9676&TB\_iframe=true [↑](#footnote-ref-1)
2. https://juneau.org/wp-content/uploads/2021/12/Juneau-Tourism-Survey-Report-REV-12\_1\_21-1.pdf [↑](#footnote-ref-2)
3. https://www.kinyradio.com/news/news-of-the-north/assembly-approves-changes-to-waterfront-plan/ [↑](#footnote-ref-3)