My comments on the MGRA SDEIS are below.

**Introduction**

Use increased from 372,464 (2006) to 490,644 (2019) at the Visitor Center Unit and use increased in the MGRA from 395,810 to 544,890 during the same period. With use increasing that much and capacities allowing much more use, it’s hard to believe the SDEIS assertion that the local experience is “improving” or will continue to improve as the visitor capacity increases. [Document 0234]. Some user groups may see improvements (e.g., skiers), but many others will be negatively affected (see the volume of comment letters).

The SDEIS states use will be impacted but glosses them over with the structural improvements and changes to the Recreation Opportunity Spectrum (ROS). For example, “These three access methods (motorized and non-motorized boat tours, and guided hikes) would deliver **many more people** [bold added] to the face of the glacier than current conditions and combined with proposed infrastructure (Remote Glacier Visitor Area) would substantially increase the number of social encounters in this area. Combined with proposed infrastructure, the existing character and recreational experience of the area closest to the Mendenhall Glacier would be altered.” [3-79]

While this Special Interest Area (SIA) has a recreation component, the proposed project goes further than necessary to allow for the potential commercial growth. Many of the components can be scaled back, or dropped, and still achieve the Purpose and Need—which is really geared to accommodating more tourists. This would be much more in line with the Forest Plan Objectives for SIAs.

**Forest Plan**

Page 3-52 of the SDEIS includes a lengthy discussion of the Regulatory Setting and Consistency with the 2016 Tongass Forest Plan. One phrase in that section sticks out:

“…giving particular attention to opportunities that are important to local users, tourism, and commercial service providers; identifying those recreation uses that may be in conflict with each other; and **reducing recreation user conflicts and polarization.”** (pp. 4-41 to 4-47) [bold added]

It’s apparent that the scope of the proposed activities has done little to reduce user conflicts, and judging by the volume of comment letters, has only served to increase the polarization.

The Forest Service is skewing the interpretation of the Forest-wide Recreation & Tourism standards and guidelines (S&Gs) too far at the expense of the Special Interest Area (SIA) LUD designation. While it is true the MGRA has a long history of recreation, that does not mean those S&Gs should run rough-shod over the LUD designation in an effort to support the visitor industry. Somewhere along the line, the SIA’s objectives of “…do not compromise the characteristics of the area…” and “Provide for existing ROS, unless public use is specifically restricted for the protection of other resource” have been left in the construction dust of the proposed projects. Many of the stated goals such as “providing interpretation and regulating use to eliminate adverse effects on special features” can be handled with a much lighter touch on the landscape.

**Range of Alternatives/Alternatives Eliminated**

Some of the rationale for eliminating alternatives, such as the “East Side-Only Development,” is tenuous and often contradicted in the SDEIS.

“Crowding in the Visitor Center area is expected to increase. Even with added facilities, this concept would impact all users’ experience if visitors cannot disperse over the MGRA.” Won’t dispersing the crowd into areas used by locals, decrease the local resident experience? In fact, it does decrease the local resident experience and the SDEIS states:

“In high value use areas that are popular with Juneau residents, additional recreational experiences and easier access to more areas of the MGRA could interrupt the solitude and quiet they have come to expect in some places such as the Dredge Lakes and West Glacier Units. User conflicts inevitably arise on multi-use trails between different recreation types such as walkers and dog walkers, cyclists, bird watchers, and recreational skiers. The Lakeshore Trail in particular would be expected to have an impact on walking and bird watching activities for which the area along the shoreline of the lake has become known.” [p. 3-79]

The SDEIS goes on to state:

“…with the anticipated increase in visitation over the next 10 to 20 years and the likelihood that the glacier will not be visible from the Visitor Center in 30 years, **unintentional visitor-created environmental impacts (erosion due to users stepping off trails, disturbances to bears and nesting birds) would likely increase**. [bold added] Spreading visitors out to designated locations over a greater area of the MGRA will allow greater control of these and other overflow impacts.” [p. 2-91].

I would argue that ***intentionally***removing habitat (e.g., Lakeshore Trail) and pushing tourists into areas that are currently undeveloped or have low use will do more to disturb bears and nesting birds, and cause erosion. The 10-24 acres of Acres of Moderate and High Value Habitat Impacted [p. 3-35] are indisputably greater than the “unintentional” visitor-created environmental impacts (erosion due to users stepping off trails, disturbances to bears and nesting birds)

Here are some specific examples of the ***intentional*** impacts this project will cause:

Goshawks

“New trails and associated increased trail visitation in current and future goshawk territories may affect individual Queen Charlotte Goshawks. Specifically, increased use on trails in the Dredge Lakes Unit and West Glacier Unit near Tolch Rock could increase displacement of foraging individuals and could eventually affect nesting ability, leading to goshawks leaving the area or failed nesting attempts.”

“The Dredge Lakes Outer Loop would host commercial bike tours that would also increase use and disturbance. Other disruptions to goshawk foraging activities would continue along trails not in the immediate proximity of nests.”

“Moderate and high value habitat for goshawks would be permanently impacted by new construction in each of the action alternatives.” [p.3-34]

Bears

“Project components proposed in the currently less-developed outer areas of the Visitor Center Unit and within the Dredge Lakes Unit and West Glacier Unit would have the potential to directly impact bear habitat, disrupt bears, and lead to more negative bear-human interactions. The Lakeshore Trail (especially in Alternative 2) and Welcome Center Dock (Alternatives 2, 3, 5, and 7) would introduce new facilities and visitors near the mouth of Steep Creek could block bears’ access to the lakeshore or lead to an increase in bear-human interactions at this location. Development-spurred visitor use in more remote portions of MGRA, including the Remote Glacier Visitor Area and Remote Glacier Dock or landing area (Alternatives 2, 3, 5, and 7), and West Glacier Unit Trails (except in Alternative 4) could disturb bears that are less habituated to humans.” [p 3-40]

Migratory Birds

The new Nugget Falls Trail loop along the lake shore will pass directly by Arctic tern and gull colonies as well as their nesting sites. [Appendix D-4]

In fact, “Alternatives 2, 3, 5, and 7 would have moderate effects on migratory birds and other wildlife but those impacts would not affect animals on the population level.” [p. S-6] While the effects to individuals don’t rise to population level, undoubtedly, those “moderate” effects created by the proposed projects **would far exceed the unintentional impacts mentioned above**. In addition, the analysis assumes that the all the improvements will make tourists behave themselves, never stray from a trail and cause increased soil erosion, or intrude on nesting birds, or interact inappropriately around bears. It could easily be argued that these unintentional effects will increase by dispersing the use.

As a result, the argument that all the proposed development is improving visitor’s experience, and preventing resource impacts, derailed this potentially viable alternative from detailed discussion.

The Purpose and Need Statement states:

“The purpose of the project is to update infrastructure and create recreation opportunities at the MGRA that can accommodate projected future visitor use while protecting the unique characteristics and outstanding beauty of the area. The project is needed to continue to provide quality opportunities for all visitors to enjoy the recreation area, to provide new recreation and interpretation experiences that emphasize the area’s outstanding scenery and wildlife resources even as the glacier recedes out of view of the existing Visitor Center, to meet the demand of the visitor industry and support the economy of Southeast Alaska, and to protect the area from environmental impacts associated with increased visitation.”

The SDEIS states, “In addition, limiting facility improvements to the **east side only** [bold added] would not enhance the recreational experiences on the west side for other user groups, including local mountain bike and Nordic ski groups, since no improvements would be made to the west side.” [p. 2-91] The analysis focusing on “east side only” represents a tunnel vision approach to alternative consideration. While there were comments about keeping development to the east side, there was ample opportunity to expand that thinking to allow some development on the west side, still be responsive to the comments, and meet the Purpose and Need. For example:

* Enlarge parking lots in the Skater’s Cabin/West Glacier Trailhead area;
* Build public cabins in the campground;
* Construct multi-use high and low loop trails appropriate for Nordic grooming connecting to West Glacier Trail;
* Improve and formalize the user-created trail to the glacier.

Each of these improvements would be enhancing the recreational experiences on the west side for mountain bikers, skiers, and hikers.

Moreover, the SDEIS repeatedly falls back to historical documents that shows the importance of recreation in the MGRA. That is not disputed. However, one of the most recent MGRA plans states:

“The 1996 MGRA Management Plan, revised in 2015, states the following: “the overall vision for the Recreation Area is for the area to remain relatively undeveloped, **allowing for concentrated, high levels of use at two specific sites (the Visitor Center, Mendenhall Campground), moderately concentrated use at three sites (West Glacier Trailhead, Skater’s Cabin, and Mendenhall River) and dispersed, low to moderate use on Mendenhall Lake and in the rest of the Recreation Area”** [bold added]

This is another consideration for why an alternative that followed the guidelines above should have been considered.

**Lakeshore Trail**: All of the action alternatives have a Lakeshore Trail or something closely resembling it. In fact, the ROS for every action alternative is Urban—not exactly a reasonable range of alternatives. [Appendix A, p. 6] All of the action alternatives have a capacity ranging from 214,000 to 321,000 (three have this highest capacity). It seems a reasonable range would might include a capacity of 50,000 or 100,000 and there is no explanation why all the alternatives all err on the high to highest capacities. An alternative with a much lower capacity could still meet the Purpose and Need.

Connecting existing trail segments to a new segment is still largely achieving the same function—turning a relatively undeveloped portion of the MGRA into an Urban thoroughfare. [Table 2-1, Summary of Alternatives, p. 2-7] All the versions of the trail are either along the lakeshore or not far inland. The inland versions of the trail also have multiple “exit” routes to the shoreline. While the inland versions of the trail screen the trail from the lake, the multiple exit routes will channel users to the shoreline and further damage habitat. It is not difficult to envision users:

* taking an exit, walking the lakeshore, and then taking another exit back on to the Lakeshore Trail;
* Spilling out multiple exits toward the lakeshore and returning the same way.

This will largely undo any benefits from moving the trail inland in terms of impacts to people wanting to walk the shoreline without running into hordes of users, minimizing the noise and visibility of the users along the shore, and contributing more of those “unintentional visitor-created impacts” to birds and other animals that rely on this relatively quiet part of the shoreline. The May 9, 2022 Audubon Society letter articulates the impacts: “All versions of this trail destroy vast amounts of wetlands, riparian areas, and deciduous habitat, all important to local birds and birdwatchers. The recently deglaciated areas offer a rare habitat and diversity of bird species not found on other local trails. For local users and independent travelers, the Lakeshore Trail and Loop would erase the ability to recreate anywhere with a glacier view that was not in use by multitudes of visitors.”

IDT meeting notes on March 15, 2021 even state, “Moving Lakeshore Trail inland with spurs (design team Option 3) **contradicts the management plan direction for desired future conditions and local use**.” [bold added, Document 467, p. 2] Aside from this laudable note recognizing the SIA’s desired future conditions, I could not locate any information in the SDEIS or the record that addressed the potential impacts of these exit ramps on the various resources.

Based on DEIS comments, it seems *one* reasonable action alternative would have dropped the entire concept of a Lakeshore Trail (and its permutations) and still included other facets of the overall MGRA proposal.

The capacity for the Lakeshore Trail is 32 percent (321,000/999,000) of the overall Visitor Center Unit *capacity*. The actual commercial allocation for the entire Visitor Center Area is 869,130 but the commercial allocation for the Lakeshore Trail is 10 percent (32,100). Removing commercial use from the trail only affects 4 percent of the commercial *allocation* (32,100/869,130) in the Visitor Center Area. From a commercial standpoint, removing the trail from an alternative does not have much of an impact and the Purpose and Need for the Visitor Center Area would still be met.

Now, let’s take this one step further. Dropping the Lakeshore Trail from an alternative still allows for a Visitor Center Area capacity of 678,000. The Purpose and Need would still be fulfilled because visitor use could increase from 544,890. [p. 2-18 and Appendix A, p. A-3]. An increase in use from 544, 890 to 678,000 slightly exceeds the 2 percent growth (664,218) but only for a 10-year period. However, there is nothing sacred about the length of time used in the growth model, and 10 years would still allow growth using the 2 percent in the SDEIS.

During the webinar on January 26, 2023, Brian Meissner pointed out an area along the proposed Lakeshore Trail not quite halfway to the proposed bridge. He anticipated that the majority of visitors would make it only as far as this location due to time constraints, and that was fine because the location offered a good view. It seems an even shorter version of the Lakeshore Trail than the one mentioned by Brian, extending as far as the sand bar and just west of the boat dock in Figure 2-18 [p. 2-63] would also allow visitors to get a good view, stretch their legs, and help disperse use from the immediate MGVC area. There is a hump of rock across the lake that actually blocks the current view of the glacier if you continue walking too far along the shoreline. Interestingly, a much-shortened Lakeshore Trail does not appear in any of the action alternatives even though it would meet many of the project’s objectives.

On the same webinar, Monique Nelson shared that consideration for hunting was a reason for not formally adopting the user-created trails around and to the east of Glacier Lake. This was done to prevent user conflicts with hunters using that area. Two alternatives (4 and 6, pages 2-65 and 2-67) responded to the hunter’s concerns. Yet, no similar accommodation was made for the bird and wildlife watchers and other users along the Lakeshore despite the SDEIS noting how valuable this area is to those users. [p. 3-79] Moving the trail inland doesn’t really count because people will use the exit ramps.

Expanding the amount of skiable terrain along the shoreline (or slightly into the woods) isn’t warranted and is inconsistent with the SIA’s Objectives. The JNSC can set several miles of trail on the lake when conditions are suitable. Granted, lake conditions can be variable but it prevents the amount of environmental impact and keeps the entire character of the shoreline from changing. This would be much more consistent with the “do not compromise the characteristics of the area” wording in the Forest Plan for SIAs.

Beyond the numbers and other aspects of the Lakeshore Trail though, the Juneau Audubon Society’s scoping comment sums things up:

“There are serious flaws with the proposed new Lakeshore Trail; we recommend ths trail not be included in the final plan. This up-to-12-foot-wide paved, semi-motorized trail along the shore of the lake would change the wild character of the shore, remove key wildlife habitat and corridors, and cause disruption to campers paying to stay at the 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 along this proposed trail corridor.”

The Lakeshore Trail does provide benefits, such as cross-country skiing in the winter, as well as negative environmental impacts. However, from a NEPA standpoint, one action alternative without this trail is a reasonable alternative.

On the East Side

**Nugget Falls Trail**: The SDEIS had the opportunity to develop alternatives with greater differentiation between them. All the action alternatives have the Nugget Falls Trail in a loop [p. 2-8]. No alternative includes widening the existing trail slightly to handle more visitors. This option is viable, meets the Purpose and Need, and would minimize effects to birds along the shoreline as well as any other incidental effects the mentioned earlier. It would also screen the thousands of visitors from view along the lake, and keep noise from traveling across the lake. It’s not clear why the Lakeshore Trail can be 14 feet wide but the Nugget Falls Trail can’t be (only if absolutely necessary). Widening the Nugget Falls Trail was specifically mentioned as an option in comments on the DEIS.

The SDEIS states, “This component (the Nugget Falls loop) was added after concerns about crowding along this trail were raised during the early 2020 scoping effort.” A review of the February 12, 2001 Scoping Report and Comment Summary (p. 18) includes a discussion about the Nugget Falls Trail but the only mention of a loop [p. 2-30] is in regard to bears potentially getting “stuck” inside the loop. A review of the scoping comments shows only one comment (Wertheimer) about “improving” the Nugget Falls trail, and that was in relation to having the trail extend towards Heintzleman Ridge, not along the shoreline. In fact, the scoping comments from past and present JRD employees commenting on their own time indicates none of them, though they are intimately familiar with the area, mentioned crowding on the Nugget Falls Trail. [see scoping comments: Lamm, Eney, Debardelaben, Schneider, Sherwin, Craig, Dee, Wright, Neary, Glaves]

The monitoring for this trail from 2016-2020 occurred on only 3 confirmed days (the 2016 report did not state how many days were monitored but it is most likely minimal). [see Trail Monitoring Reports 2016-2020]. Despite virtually no monitoring, this trail has been determined to be insufficient in handling the number of people using it. And an entire new section of “loop” has been determined as necessary to correct a problem that doesn’t appear to exist.

Furthermore, the 2017 Raincoast Data/Corvus Design Survey (RDCD survey) indicated the Nugget Falls Trail had the highest “very satisfied” rating from locals and tourists. [p. 2].

Finally, according to the SDEIS:

“Urban ROS: The 2016 Tongass Plan does not state a limit to the number of parties encountered. Capacity calculations for the Urban ROS in Alternative 1 are based on PAOT, as described in the 2015 MGRA Management Plan. Capacity calculations for the Urban ROS in Alternative 1 are based on PAOT, as described in the 2015 MGRA Management Plan and do not state a limit to the number of parties encountered. Capacity calculations for the Urban ROS in Alternative 1 are based on PAOT, as described in the 2015 MGRA Management Plan. Capacity calculations for the Urban ROS in Alternatives 2-7 are generally based on 150 PAOT with some exceptions.” (p. A-5)

The 2015 EA provides some additional insight:

“Given the design of this trail [Nugget Falls Trail] to accommodate high levels of visitors in the core of the Visitor Center Unit, the existing high level of use, and **the lack of unacceptable resource impacts from current use** [bold added], District staff have determined that this trail should have an Urban designation. Capacity has been estimated based on the 100 PAOT standard for Urban ROS trails, resulting in a seasonal capacity of 153,000. 100 PAOT x 10-hour day x 153-day season = 153,000.” [2015 EA, p. 26]

Changing the PAOTs from 100 (in 2015) to 150 (SDEIS) does not mean the existing trail will be crowded. The trail is approximately ½-mile long (~2600’) which means there could be 1 person every 17’ linear feet of trail (2600’/150 PAOTs). People don’t uniformly spread out so let’s assume there are 3 people in a group. If that’s the case, that equals 1 group every 52 linear feet of trail (2600’/3 people in a group). That is hardly crowded by any standard, let alone a trail in the Urban ROS category which doesn’t have an encounter limit.

Essentially, nobody seems to be overly concerned about problems on the Nugget Falls Trail so it is curious how the loop concept not only was conceived, but how it appeared in every action alternative.

**3.2.2 Incomplete or Unavailable Information**

The SDEIS states:

“There is incomplete knowledge about the exact visitor usage of the MGRA beyond counts of people arriving via a special use permit (i.e., by bus, tour provider, or car service). Visitor surveys at trailheads and the Visitor Center parking lot give a best estimate of Juneau resident use and independent tourist (non-commercial) use, but more comprehensive data collection would require Forest Service personnel posts at multiple entry points or expansion of the fee collection area. There are no barriers to entry, and many local users arrive on foot or by bike. This leads to uncertainty about displacement of local users and how they may use the MGRA if the crowded conditions did not exist in the primary use season.” [p. 3-3]

There will always be uncertainty about exact visitor usage but the general nature of the McDowell survey contributes virtually no useful information for managing the MGRA. A closer read of the 2021 McKinley survey indicates that only *one* question was asked in the phone and online version, and it was pretty generic:

“For each of the following visitor-related impacts, was your household very affected, somewhat affected, or not affected in 2019?” “Crowding at the Mendenhall Glacier “was one of the options [p.2]

I suspect most respondents interpreted “Mendenhall Glacier” as the immediate Visitor Center environs. It would have been much more meaningful if a recent survey specific to use in all areas of the MGRA was done.

The SDEIS states:

“Consultation with the Forest Service, Pacific Northwest Research Station, Forest Sciences Lab regarding Juneau resident use and displacement at the MGRA suggested implementation of visitor surveys in conjunction with ongoing trail monitoring to better understand local experiences.” [p. 3-53]

As for the FSL input (which occurred several years after the RDCD survey), I hardly think FSL had such a limited survey (i.e., McKinley) in mind, especially since it should have been done “in conjunction with the trail monitoring.” Perhaps the results about crowding would not be the same if a survey specifically asked *where* visitors felt crowded in the MGRA (and not just the “Mendenhall Glacier”). Since crowding is such a big issue, it seems the Forest Service could have done much more to identify the specific areas where crowding is occurring.

The RDCD survey is an improvement. That survey from 2017, or something similar, should be repeated (at least every few years) since it will be 6 years since the original survey, and visitor numbers have increased. Perhaps this could be part of the AMP. The Forest Service deserves credit for conducting the survey (or paying for it) but it should never complain about the expense since the agency has spent millions of dollars on this project designing various features for the proposed improvements including bathymetric surveys for docks ($234,000), Lakeshore Trail design ($163,000), and Welcome Center architectural studies ($410,000).

The RDCD survey only contacted 173 tourists and 93 local residents during the months of August and September. That translates to about 3 tourists and 1.5 locals per day. I believe it the survey results would be much improved by increasing those numbers and fine-tuning the questions.

The SDEIS goes on to state:

“However, questions added to local city-wide surveys, and public comments received during the master planning and draft environmental impact statement (EIS) efforts have captured a good estimate of this population’s use and the dynamics present between the different user groups. The basic data and relationships are sufficiently well-established to analyze and disclose possible adverse effects and for the responsible official to make a choice between alternatives.”

Despite the above-mentioned surveys, and hundreds of public comments opposing much of the proposal, the analysis continues to mention how residents will benefit even though the SDEIS states there will be moderate to major effects in some areas. More specifically, “…it is expected that number of encounters would increase in multiple areas throughout the MGRA even though additional facilities would allow visitors to disperse through a greater area.” [Alt 5, 3-91]

Yes, the visitor center, toilets, parking area, Steep Creek, Photo Point, and related areas can get very crowded. But what do we really know about crowding on the Nugget Falls Trail or should we be concerned since the ROS does not state a limit to the number of parties encountered?

And what about crowding on the Moraine Ecology Trail? Or areas just outside the core crowding area in terms of how a person who comes to the area for the first time really feels? Are people feeling crowded in these areas? And won’t some of the proposed changes in the above-mentioned areas address this supposed crowding? Where are the surveys and trail monitoring in the record that support all the changes based on “crowding?”

The Moraine Ecology Trail currently has a Roaded Natural ROS designation and 5 of the 6 action alternatives change that to Rural. There has been no Moraine Ecology Trail monitoring. [see Forest Service MGRA Trail Monitoring Reports 2016-2020]So, why is there a need to propose trails around the southern end of the lake when there is nothing in the record to indicate the Moraine Ecology Trail is crowded, even with the more conservative Roaded Natural ROS designation?

While it appears the RDCD survey was used in the analysis, which other “MGRA visitor surveys” were incorporated into the SDEIS (p. 3-3)? There is no citation to a survey aside from the generic 2021 McKinley survey and a citation should be included if they were referenced. A word search for visitor “survey,” “Raincoast,” or “Corvus” did not turn up anything in the project record other than the McKinley survey in the SDEIS, and no mention of a survey appears in the AMP even though the SDEIS states, “Visitor surveys and trail monitoring were incorporated into the adaptive management plan for this project (Appendix B) to ensure the recreational needs of Juneau residents and non-residents are being considered at the MGRA. [p. 3-53]

**Recreation Opportunity Spectrum (ROS) and Market Demand**

The SDEIS states:

“The Forest Plan allows for changes to ROS designations, with direction to “update existing ROS inventories as a part of specific project planning and implementation, and whenever project activities cause a change in recreation setting conditions significant enough to reclassify the affected area” (USDA Forest Service 2016, p. 4-41). An amendment to the Forest Plan would not be required to update any ROS classes within the scope of this project.” [p.3-54]

The proposed change to the Remote Visitor Center Area is based on the unsubstantiated premise that people have the time to travel there. It’s not clear how the current time cruise ships allot to tours to the MGRA will sync with the boat tours on the lake and the walk to the glacier’s face. “For example, round trip boat travel time would take around 1 hour, which does not include time spent exploring the area around the glacier. The 2017 visitor survey reported that visitors to the MGRA stayed for an average of 2 hours and 17 minutes (USDA Forest Service 2018). The Market and Economic Analysis states, “Most visitors spend 75 to 90 minutes at the MGRA. When the site is combined with another tour, time spent at the MGRA is generally limited to 60 minutes” and “Expanding the amount of time spent at MGRA is challenging...” [p.9]

Estimating a 1-hour boat round trip and 30 minutes exploring the base of the glacier, this could increase a visitor’s stay to closer to 4 hours.” [p. 3-79] With limited time in port, how will downtown businesses be affected by tourists having 2 hours less to shop and eat?

In addition, the Market Demand and Economic Analysis states, “Tour operators have mixed opinions about the need for boat access and remote facilities.” [p.1] That does not appear to be consistent with the Forest Plan wording on p. 4-41 about a “significant need to reclassify the affected area.” Keep reading the Market Demand and Economic Analysis and it states, “Guest satisfaction among Juneau visitors is generally high, particularly for tours that include the MGRA.” And “Tour operators report no noticeable change in guest satisfaction with their experience as the glacier recedes.” Most visitors are seeing the MGRA for the first time and have no comparison. Ironically, the Analysis goes on to recommend, “Respect concerns and needs of user groups, including Juneau residents, visitors using non-motorized vessels on the lake and trails…” [p.4]

If a business (notably Gastineau Guiding, Market Demand and Economic Analysis p. 11) expressed an interest in boating across the lake to a Remote Visitor Center Area, is that enough to warrant a significant change to the ROS? The SDEIS states, “

These three access methods (motorized and non-motorized boat tours, and guided hikes) would deliver **many more people** to the face of the glacier than current conditions and combined with proposed infrastructure (Remote Glacier Visitor Area) would **substantially increase the number of social encounters in this area**. Combined with proposed infrastructure, the existing character and recreational experience of the area closest to the Mendenhall Glacier would be altered.” [bold added, p. 3-79]

There are hundreds of comments against that part of the proposed action, which raises the question why only 2 of the 6 action alternatives do not include boats and the Remote Visitor Center Area. It’s also curious how boats and the Remote Glacier Visitor Area concept ever came to fruition.

**Consistency with the MGRA Management Plan Management (3.7.2.2)**

The SDEIS states:

“Consistency with the MGRA Management Plan Management of the recreation area is provided by the MGRA Management Plan that establishes a desired future condition and management goals for the MGRA. The 1996 MGRA Management Plan, revised in 2015, states the following: “the overall vision for the Recreation Area is for the area to remain relatively undeveloped, allowing for concentrated, high levels of use at two specific sites (the Visitor Center, Mendenhall Campground), moderately concentrated use at three sites (West Glacier Trailhead, Skater’s Cabin, and Mendenhall River) and dispersed, low to moderate use on Mendenhall Lake and in the rest of the Recreation Area” (USDA Forest Service 1996a).

This cites the MGRA Plan and then notes the two main areas for high levels of use (which doesn’t include the Remote Visitor Center Area or Lakeshore Trail). “The MGRA Management Plan is purposely broad to provide flexibility in responding to future changing uses. The Forest Service must periodically review its management to keep pace with changing policy, use patterns, and expectations of the public. The 1996 MGRA Management Plan states that it “provides the framework for more proactive decision making for problems that may occur in the foreseeable future” (USDA Forest Service 1996). Being “purposely broad” does not mean expanding use exponentially into areas of low use. Plus, there is no compelling public demand for boating on the lake or use at the Remote Visitor Center Area. The 2017 RDCD survey did indicate visitors wanted to have more time in the MGRA. That should not be a surprise; anyone visiting a beautiful location would share the same desire. The visitors could use their additional time by visiting the improved Steep Creek area, in the new Welcome Center, using the Moraine Ecology Trail, etc.

However, any attempt to tie visitors needing to boat across the lake to the Remote Visitor Center Area based on needing more time, is a tenuous connection and is not clearly demonstrated in the record.

**Adaptive Management Plan (AMP)**

It’s apparent the Forest Service does not want to include anything more in the AMP than vague statements about its plans. Aside from my numerous AMP comments from the DEIS, most of which are still relevant to the SDEIS, here are a few more:

iii. Resource conservation monitoring yields no concerns, or areas of concern have a plan for resolution that includes education, enforcement, treatment, repair, or facility improvement to correct poor function. Plan must be implemented before increasing service days. [p. B-11]

Shouldn’t the plan for “areas of concern” resolve issues **prior** to issuing more service days? What if the plan doesn’t fix the problem but the service days are issued? Once that occurs, it’s almost impossible to decrease service days.

I’m not sure what “metering” has to do with the percentage of electric vehicles in the fleet. When do the guides have to get to 100 percent? [p. B-12] Related to this, why is metering brought up here but is not mentioned anywhere else as a possible management tool?

While it may seem obvious, how is a “negative human-bear interaction” going to be defined? Without a clear, replicable definition, this indicator won’t be very helpful. It will be even more difficult if various seasonal staff who come and go with differing levels of comfort around bears, are doing this monitoring. [B-13]

How can “changes to bear habitat use and areas of use” be determined if the Forest Service doesn’t know where the current use is for most of the MGRA (e.g., Dredge Lakes). [B-14]

What constitutes a “breach of bird nesting areas?” Stepping over a line? How many breaches are acceptable? How much nest abandonment is acceptable? I’m assuming there is a nesting period; if so, what is it? [B-14]

How will “trails and facilities functioning to prevent stream and lake impacts be determined?” Will the agency be measuring square footage of erosion, turbidity, etc.? How will trail improvements be defined? [B-14]

What constitutes an additional restroom? A new Porta Potty? [B-14]

What will be the “buffer distances” watercraft will need to abide by and who will be monitoring this buffer distance?

Since the Forest Service didn’t include more AMP details in the NEPA, a citizen’s advisory board should be established during development of the AMP, to provide oversight. This would be consistent with the SDEIS stating “…to give the public an assurance that the increases in commercial use allocations will be based on monitoring information and will be phased in rather than allocated in bulk following a project decision...” [B-9] Furthermore, in his December 16, 2020 scoping letter, the Forest Supervisor pledged, “We are committed to an open, transparent, and inclusive process as we conduct the analysis for this project. Your input is valued and important to a successful outcome.” Creating a citizen’s advisory board is one way to do this.

**Bears**

The ABR Biological Resources Review for the MGRA states:

Despite the collection of static, point-in-time observations of bears in the MGRA over several years, there remains little detailed information on how bears move through the area and what travel corridors are used most frequently (ADFG and USFS 2012). Five black bears captured in the MGRA and 5 others in the Juneau area were fitted with GPS radio-collars for evaluation of their movement patterns inside and outside of the MGRA, but to date only an analysis of home range size of those bears has been made from the data collected (Crupi undated). Further analysis of the relocation information for those collared bears would undoubtedly provide insight into how bears move through the landscape at the MGRA, but such an analysis is beyond the scope and timeline for this study. [p. 43, Document 801]

“Although most bears observed at the bear-viewing areas in the MGRA have some level of habituation to humans, some bears in the area are likely to avoid areas with a high human presence and prefer areas away from trails and bear-viewing platforms, or use those areas during periods when few people are present.” [p. 47]

Aside from some bear surveys in 2008 and 2011, estimating 9 to 15 individual bears using the MGRA there is not a lot known about bear use in the MGRA. “Opportunistic” observations that “were not collected systematically by MGRA staff” provide useful information but “these results need to be interpreted with caution.”

The SDEIS is replete with bear movement maps in the immediate visitor center area. (Appendix D, pgs. 10-15). There is no data for the rest of the area, particularly Dredge Lakes, where the proposal will have the greatest effect by creation of the Lakeshore Trail. True, the black bear population won’t be extirpated on the Tongass but the Forest Service is removing habitat, and introducing large numbers of humans (the capacity of the trail is up to 330,00) into that habitat without knowing the true *local* impact to the bears, both male and female. Many of these bears (mostly female) are highly viewable and add an important dimension to the area. Undoubtedly, male bears are using some of the more remote parts of Dredge Lakes. So, the question is not whether the bears will be extirpated, but what will happen to the bears when portions of the area are converted to an Urban ROS, a designation not common on the Tongass.

The AMP mentions monitoring bear habitat use change. [p. B-14] It will be very difficult to assess that change without having that “further analysis of the relocation information for those collared bears” which “would undoubtedly provide insight into how bears move through the landscape at the MGRA.” It’s hard to believe that “such an analysis is beyond the scope and timeline for this study” given the Forest Service paid over $300,000 for bathymetric and docks studies and $395,000 for the Remote Visitor Facilities Preliminary Studies. [MGVC Award Summary, October 13, 2022]

**Other Thoughts**

Table 2-8. Summary Comparison of Effects:

* Alternative 1: More encounters would be experienced in multiple locations over 15 and less than 80% of the primary use season.
* Alternative 2: Encounters would increase in multiple areas for more than 15% and less than 80% of the primary use season [p.2-97]

How does Alternative 1 – No Action have the same effects as Alternative 2 when the latter is the most impactive alternative?

Nugget Falls Trail Expansion: “Noise from the trail would not be expected to increase over existing levels.” [p. 3-75] If the trail is now part of a loop with half of it on the lakeshore, how is it possible that noise from thousands of tourists is not going to increase “over existing levels” now that there is no vegetation to filter the noise? The SDEIS assertion is unsupported in the record.

Social Encounters: “However, Juneau residents that traditionally avoided the MGRA in the primary use season may start to visit during those months, even with the expected increase in social encounters, because of the increased ease in parking and access to other quieter locations like Dredge Lake.” [p. 3-90]. While this assertion may be *possible,* many residents don’t avoid the *MGRA*, they avoid the *MGVC area.* Residents are currently in the Dredge Lakes area (and other lesser used portions of the MGRA) and now will be competing with commercial users in parts of the Dredge Lakes area, making them more likely to avoid the area, not use it more. There is nothing to support the SDEIS assertion.

Shuttle Buses in Alternative 6: “The shuttle would increase their [visitor] length of stay at the glacier without increasing interpretive benefits as the shuttle ride would not be long enough…” [p. 3-93]. This statement shows the inherent bias in parts of the SDEIS. We’re talking about a shuttle ride from the commercial overflow lot to near the MGVC, a ride of only a few minutes. Surely, not every minute of a visitor’s time has to be packed with interpretive information. I don’t believe there is interpretive information on the Nugget Falls Trail (with the exception of the Romeo plaque). Somehow, these visitors survive and in fact, rate this trail “very high” [RDCD survey, p. 2]. Nor is there interpretative information in the bathroom stalls—a location just crying out for interpretative material if the goal is to make every minute of the visitor’s stay focused on education. The very fact that visitors would be riding on an electric shuttle, something many visitors may not have done before, is an opportunity for interpretation—even if it’s just with the driver mentioning some basic info about the shuttle.

CBJ Assembly Decision: how does the recent Assembly decision to limit the number of boats to 5 per day affect the MGRA visitor projections?

A Reasonable Decision

Based on my comments, I believe a reasonable alternative would include but not be limited to:

* No motorized boats of any kind on the lake;
* No remote visitor center area;
* No Lakeshore Trail;
* No Nugget Falls Trail loop;
* No commercial use in Dredge Lake;
* While I like a Welcome Center near the MGVC, I feel the Welcome Center in the commercial bus lot does more to solve a central issue—congestion;
* Build a few cabins in the campground, but only after monitoring the incremental impact to the JNSC and others;
* Build the West Glacier Spur Trail that connects to the upper West Glacier Trail;
* Build the West Glacier High Loop. This will help address the JNSC statement, “This trail system is seen as an integral part of a connected valley trail system and could very well become the *gem* [italics added] in the MGRA nordic trail system.” While this likely won’t address all of JNSC’s needs, it certainly expands the amount of skiable trail without compromising Dredge Lakes.

This alternative would meet the Purpose and Need, address an increase in visitor use, be responsive to public comment, and provide a lighter touch on this SIA.

**Upcoming Objections**

I believe any objection for this project would get a more unbiased review by having either another region, or the Washington Office (WO), handle the objections. I realize this is a difficult “ask” for the Regional Office (RO). I am fully aware the Forest Supervisor is signing the decision and the level of review is one administrative level above him. The Forest Supervisor who initiated the project stated, “We are committed to an open, transparent, and inclusive process as we conduct the analysis for this project.” This open, transparent, and unbiased process should also extend to the objections.

Some may argue that this project is “different,” but that doesn’t remove the cloud of potential bias. The Director of Engineering and the Director of Rec & Lands are on the RO steering committee for the project and the project IDT leader—who is now the Ecosystem Planning (or whatever it’s called these days) Director--will be directly involved in the objection process. I want to make it clear that I have the utmost respect for the professional skills of all the people involved in this project, and am not impugning their reputation by questioning their objectivity. You can’t objectively review your own work.

I suspect the RO would not want me to write the objection response even though I have knowledge of the laws and regulations, have past experience writing responses, and am very familiar with the project as well as the project record. Why? It would be difficult to be objective.

Based on 35 years of experience working for the Forest Service in Juneau, I have never seen this level of *direct* RO involvement in a district project. The Director of Rec & Lands has been on the steering committee for this project since its inception. In fact, the Director’s involvement is so deep he was involved in a discussion of window mullion size and offered to “go to the APK Library to look out those windows for comparison.” [Document 597, MGRA meeting September 9, 2021, p. 1] Even the now-cancelled Central Tongass Timber Sale DEIS, one of the largest timber sales on the Tongass, did not have RO Timber Management or Engineering staff on a steering committee.

**Final Thoughts**

Please ensure the Forest Service provides members of the public with a **functioning, linked** project record when it is requested (unfortunately via FOIA).

Thank you.

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