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US Forest Service
8510 Mendenhall Loop Road
Juneau, AK 99801

To Whom It May Concern,

The Juneau Audubon Society is a non-profit organization serving Southeast Alaska. Our mission is to conserve the natural ecosystems of Southeast Alaska, focusing on birds and other wildlife and their habitats for the benefit and enjoyment of current and future generations.

Below are comments for the Mendenhall Glacier Visitor Facility Improvements Project Draft Environmental Impact Statement (March, 2022) and the Supplemental Draft Environmental Impact Statement (January 2023).

The Mendenhall Glacier Recreation Area (MGRA) includes essential breeding, migration, and year-round habitat for numerous wildlife species, many of which are sensitive to habitat disturbance and unlimited human access. The Visitor Center represents a valuable resource for educating the public about its unique natural setting, dynamic processes, and natural, historic, and cultural resources. For those reasons it is prudent to consider the potential impacts on those resources to ensure that expansion of facilities does not interfere with accomplishing the stated vision, mission, and goals of the Mendenhall Glacier Master Plan. We are concerned that over-development will jeopardize long-term sustainability of the very resources that attract visitors and local users.

Unfortunately, we cannot support any of the proposed alternatives put forth in the Draft EIS or Supplemental DEIS. Although some elements seem to be reasonable updates to existing infrastructure or potentially beneficial restoration around Steep Creek, we think each alternative contains elements that would irreversibly alter the habitat for wildlife and the unique natural experience for visitors. Therefore, we prefer the **No Action** alternative. If a decision is made to select one of the other alternatives, we strongly recommend you take our comments into consideration to remove components that pose detrimental

habitat-related impacts to the Mendenhall Glacier Recreation Area or create safety hazards to visitors or staff.

We commend the agency for making improvements based on earlier public comments and for considering helpful mitigations such as improving glass to be safer for birds, closures around active goshawk nests, and reduction of wake near seabird colonies (Table 2-6). Regarding glass improvements, we suggest that new facilities should be designed with bird safety as a goal rather than relying on retrofits. If a development alternative is adopted, we encourage the agency to consider mitigations to specifically address concerns and issues raised regarding wildlife and habitat, and that the agency will reconsider implementing facets of the plan for which suitable mitigation is unavailable or likely ineffective.

We continue to have several additional concerns detailed below.

1. New trail development, wildlife viewing, and bear and human safety

For several reasons, we have concerns about the Lakeshore Trail and Loop through the Dredge Lakes Unit. At a width of up to 12 feet, such a trail should be more appropriately referred to as a road. Although the option in Alternative 4 that is set back from shore is an improvement over other options, all versions of this trail destroy vast amounts of wetlands, riparian areas, and deciduous habitat. Recently exposed 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 eliminate the ability to recreate anywhere with a glacier view that was not in use by multitudes of visitors.

We are concerned that new developments will disrupt birdwatching, a key recreational activity. Birding is popular with local users and visitors alike. According to the U.S. Fish and Wildlife Service, about 20% of Americans are bird watchers. The MGRA provides the only convenient and accessible local access to view several bird species. Three particularly important species are Arctic Tern, American Redstart, and Rusty Blackbird, all of which have been listed as species of concern on peer-reviewed conservation plans.

The expansion of the Nugget Falls Trail and the Lakeshore Trail and Loop will jeopardize high value birding areas where these and other marsh or deciduous-associated songbird, shorebird, and waterfowl species can be found (Figure 1). Wide trails eliminate valuable habitat, and unlimited numbers of visitors disrupt breeding birds' behavior. Alternatively, we recommend improving and utilizing the current Nugget Falls trails and Moraine Ecology Trail as needed.

Furthermore, trail sections that parallel Mendenhall River might not be compatible with riparian buffers incorporated in the Forest Plan. These buffers were incorporated to protect this important habitat for fish and wildlife and reduce the risk of erosion.

Bear safety has still not been adequately addressed for the proposed Lakeshore Trail and Loop through the Dredge Lakes Unit. An increase in hardened trails in the area will effectively reduce essential refuge habitat for bears and other wildlife in the MGRA. JAS is concerned about increased encounters between visitors and bears (especially sows with cubs), the risk of injury to hikers, and an increased disturbance to wildlife in general. New and improved trail construction anywhere should be accompanied by an education program to improve bear awareness and safe and ethical wildlife viewing. Sensitive wildlife areas should be designated, within which a leash requirement for pets is instated and enforced. This will minimize the footprint of trails and reduce aggressive encounters with bears, especially sows with cubs. Given the length of the Loop, it is unreasonable to expect Visitor Center staff to be present and in control of interactions on such a trail. And, given the popularity of the Dredge Lakes Unit for local dog walking (often off-leash), it is unlikely that such measures will be popular or enforceable.

2. Food service

Also related to safety are inherent issues with the proposal of a restaurant at the Welcome Center. Food service is counter to the prudent management policy now in effect, which discourages food consumption near the Visitor Center. This is for bear safety. The smell of food cooking would be a bear attractant. Although the agency might state that vendors will dispose of all food in a proper manner and that visitors will not be taking food outside, it will be nearly impossible to enforce this policy given the volume of people and activities during busy summer months.

In addition to bears, other animals such as squirrels and ravens are at risk of habituation. Ravens pose a grave risk to seabird colonies; opportunities for ravens to scavenge increase their prevalence in an area and thus degrade nearby habitat for seabirds.

Furthermore, a restaurant seating area and the extra storage for trash and supplies would take up valuable habitat and recreational space, which is in direct conflict with the stated issues of congestion and crowding as justification for planning. Visitors can find many restaurants just a few miles away in town. The public should expect a natural recreation experience at the glacier. The agency should seek to maintain a natural recreation area.

3. Glacier access development for motorized watercraft

Although proposed mitigations state that routes would be established that ‘minimize disturbance’ to nesting seabirds, the proposed dock location near the Welcome Center appears to allow boat traffic closer than the Forest Plan’s guidelines of 250 m buffer for new development near colonial nesting seabirds. Moreover, it might be impossible to travel from that location to the ice without passing too close to the Photo Point Arctic Tern colony and disturbing birds.

Furthermore, it does not appear that the USFS has fully considered how the public might use the docks for private boats and other uses, or if other agencies might request use of the docks, increasing the impact of dock development beyond considerations of the current plan. The USFS has stated that it will maintain control of the docks and lake use, but recent actions by the State of Alaska challenge this assertion.

4. Protection of ground-nesting seabirds and shorebirds

Although management of seabird and shorebird nesting areas has been discussed in the EIS, ambitious development would undoubtedly impact habitat quality. Monitoring and “adaptive management” will not bring back birds if they have been ousted from their nesting areas, or the surrounding habitat no longer provides needed resources. For example, the Lakeshore Trail will negatively impact rich marsh habitat and small water channels, which produce small salmonids, dragonflies, and other important food sources for young Arctic Terns.

Suitable (flat) habitat near the glacier needs to be available for Arctic Terns to move into as climate-change related flooding and plant succession renders current nesting zones unsuitable. New trails, buildings and uncontrolled foot traffic will likely make it difficult to maintain suitable undisturbed nesting areas for Arctic Terns near the glacier face.

5. Facilities and building updates

In addition to the proposed actions in Table 2-6 related to migratory birds, we recommend specific mitigation measures to protect Barn Swallows. Barn Swallows are a favorite with visitors and offer excellent opportunities for wildlife viewing and appreciation. As an aerial insectivore the species has suffered steep declines in North America; so much so that it is listed as threatened in Canada and of conservation concern in other landbird management plans. Swallows use the existing pavilion as well as some of the bus stops, kiosks, and the Visitor Center for nesting. If buildings are slated for destruction or renovation, this should be done after the nesting season, and any new facilities should be constructed with suitable platforms for nesting. Furthermore, alternatives that require the elimination or extreme alteration of a natural pond are not recommended. Ponds provide aquatic insects, a key food resource for swallows and other birds.

We also suggest that any retrofits or new additions, including parking lots, adhere to best management practices regarding lighting for conservation as well as energy consumption. Light pollution poses a risk to migratory birds and other wildlife. Light can attract and disorient migrating birds, increasing their vulnerability to collisions and predation. Artificial light also impacts birds in the breeding and winter seasons, disrupting feeding and other vital behaviors. Thus, lights should be kept at a minimum, be shielded to focus only on direction of need, face downward, and be warm colors that are less visible to birds.

Juneau Audubon Society Comments to Mendenhall Glacier Visitor Facility Project

Thank you for considering our comments.

Sincerely,

WPSmith

Winston P. Smith, Ph.D
Conservation Board Member, Juneau Audubon Society

Figure 1.



Figure 1. Outlined in yellow are some particularly high value bird-watching areas within the MGRA: Moose Lake, adjacent marshes and riparian vegetation; marshes near Old River Trail; and shore areas near the Photo Point tern colony.