

**February 21, 2023**

**To: USFS, Juneau, Alaska**

**From: Juneau Nordic Ski Club (JNSC)**

**Re: Comments on the MGRA SDEIS Visitor Facility Improvements Project.**

### **GENERAL COMMENTS**

- The Juneau Nordic Ski Club (JNSC) would like to thank the USFS for this opportunity to comment on the Mendenhall Glacier Recreation Area (MGRA) Supplemental Draft Environmental Impact Statement (SDEIS), released January 5, 2023. The JNSC is a 501 c3 organization that serves the Nordic cross-country skiing community in the Juneau, Alaska area.
- The Juneau Nordic Ski Club submitted comments last spring on the US Forest Service's (USFS) original draft Environmental Impact Statement (DEIS), which presented four alternative scenarios. Alternatives 5, 6, and 7 have now been added to the new MGRA SDEIS, mainly to address seasonal issues in the visitor's center region of the MGRA and with parking along Glacier Spur Road. However, alternatives 2, 3, 5, 6 and 7 also all acknowledge the need for additional groomed Nordic skiing and walking winter trails to meet increased winter use.
- These Nordic skiing trails were proposed in our initial comments and have now been included. Addition of these trails (as discussed in the JNSC Nordic Ski Trail Development) will help realize our vision for an interconnected system of trails between the MGRA, Montana Creek, and Spaulding Meadows (MMS). We see this as a very positive step for those of us who enjoy non-motorized sports. It is heartening to have the USFS supporting and advocating for non-motorized winter sports activities in the MGRA Master Plan. Trails built to Nordic ski standards will also benefit hikers, bicyclists, and other users year-around.
- Our JSNC Youth Program has been a great success. This year, we have about 115 skiers in the program and two dozen volunteer coaches. Expanding and connecting ski trails in the MGRA would be of tremendous benefit to our youth programs. New, varied terrain will provide challenging opportunities for skill development and help alleviate trail congestion with other users during youth program practice sessions. Increasingly, community members find it difficult to share the trails when one of our youth groups is practicing. Unfortunately, times when the only trail that is available is the three-kilometer campground loop, traffic congestion is inevitable, particularly during weekends. The congestion also occurs during our evening weekday practice times and overlap with the segment of skiers out for a post-work ski. New trails would greatly alleviate congestion during these peak times.

- We understand that this document is geared towards addressing tourist capacity issues during the spring/summer/fall, but let's not forget the fourth season! We encourage the Forest Service to more fully acknowledge the heavy use the MGRA receives by locals during the winter and more prominently incorporate the need for winter ski trail improvements.
- Our response specifically addresses those sections in the SDEIS that explicitly or implicitly relate to Nordic skiing and Nordic ski trail development; we limit our comments and suggestions to those aspects. JNSC is not taking a position on tourist expansion at the MGRA. However, we must recognize that climate change is directly impacting cross country skiing in Juneau. Therefore, the JNSC generally supports Forest Service decisions that help minimize the carbon footprint of the MGRA facilities.
- To fully maximize these new trail opportunities the JNSC suggests that USFS employ a professional Nordic ski trail architect to help with the design of the various trails that are intended for Nordic skiing and other non-motorized winter use. Additionally, we ask that the USFS also work with the JNSC regarding trail location, layout and construction that will accommodate grooming equipment (Appendix A). Capacity for multi-season, multi-sport users is important to consider up front. From decades of grooming experience, the JNSC knows that groomed winter trails develop a larger user base than just Nordic skiers.

### SPECIFIC COMMENTS

1. **Steep Creek Intertie** - Make this under/overpass skiable in the winter! A connection between the Lakeshore and Dredge Lake trail system and the Powerline & Under Thunder Trails would allow for seamless skiing along the east side of the valley, through Dredge Lake, across the Mendenhall River, on up to the Montana Creek valley, and into Spaulding Meadows....without having to take your skis off!
2. **Lakeshore Trail** – This trail is included in almost all the alternatives and the JNSC fully supports making this trail wide enough to support our machines to groom for winter skiing! The route differs slightly between the versions, with 3, and 5 – 7 putting part of the trail inland. JNSC has a slight preference for the inland route. Trail width in 2 and 3 would be 14' and 12' for 5 – 7. Either width would be sufficient for grooming a skate and classic ski track.
3. **Mendenhall River Bridge** - This bridge would be a vital link in expanding our interconnected trail system and is a critical component to making the Mendenhall Valley a world-class ski destination!
4. **Dredge Lakes Loop** - Encircling the Dredge Lakes area, a 12' wide trail would enable winter grooming for skiers, bikers, and walkers alike and be located north of the popular southern dog-walking trails. This trail is only in alternative 6, but the JNSC is advocating for its full inclusion in all alternatives. The full loop with the Lakeshore Trail would be about 3.7 mi (~6 km) in length.

5. **Mendenhall Campground Cabins** - Alternatives 5-7 reduce the number of new cabins to four (from five) and include improved cabin-access trails that would encourage pedestrians to avoid our groomed trails. However, the JNSC still remains concerned about the impact the campground cabins will have on damaging groomed trails by non-skiers accessing cabins on foot. We suggest placing cabins elsewhere on the west side of the lake where there is road access and we still think the southernmost cabin is excessive and should be deleted.
6. **Warming Hut** - The JNSC suggests the proposed caretaker's cabin at the campground entrance double as a winter-time warming hut for skiers. This warming hut would serve as a nexus for divergent trail systems including the Campground – Mendenhall Lake system, the Lakeshore – Dredge Lakes trail system, the West Glacier loops, and the Montana Creek Nordic trails.
7. **Skater's Cabin Parking** - The additional parking lots in alternatives 5 - 7 are much preferred over adding parking inside the campground (alternatives 2 & 3) near the proposed Mendenhall Bridge. Expansion of these lots is much needed to accommodate winter trail use.
8. **Tolch Rock Spur Trail** - Located in the SW corner of the MGRA, this link as shown in Alternatives 2, 3, and 5-7 would connect the MGRA network of trails to the Montana Creek drainage trail system. JNSC considers expanding this spur trail to Nordic standards a high priority.
9. **West Glacier Trail Ski Loops** - The JNSC encourages the Forest Service to keep both the "high" and "low" loops in all alternatives, allowing for winter-time ski grooming (this may include improvements to the current West Glacier Trail to allow for winter grooming operations).
10. We suggest that the new "Welcome" facility be open during the winter especially on weekends, and perhaps once again serve hot cocoa and pie. It will be a great place for skiers and wintertime enthusiasts to congregate, warmup, and start their winter adventures!

## SUMMARY

The JNSC, and our nearly 1000 members, are very grateful to the USFS for our mutual decades-long partnership on the MGRA. Together we have provided tens of thousands of winter user days of recreation to Juneau residents and visitors. We are eager to cooperate with the USFS in developing these new trails. The expanded trail system will accommodate the growing numbers of year-around users of the MGRA for the decades to come and is integral to establishing a connected trail system between the MGRA, the Montana Creek trails and Spaulding Meadows (MMS) (<https://jnski.org/wp-content/uploads/2022/01/JNSC-Nordic-Trail-Development-Plan-Jan-09-2022.pdf>). One outcome of such connectivity will be the opportunity to have a 50 km ski race spanning MMS! The proposed trails and infrastructure in these alternatives would enable skiers (and hikers and snowshoers and bikers and dog-walkers) to

encircle the entire Mendenhall Valley, and for skiers, without kicking off their skis. All of these trails would be multi-use, non-motorized, and multi-season.

Thank you on behalf of the Juneau Nordic Ski Club.

Frankie Pillifant, President

Roman Motyka, trails subcommittee chair

## **APPENDIX A**

For general layout and construction specifications of cross-country ski trails, and more specifically the WGL Trail, an example of guidance for cross-country ski trail construction comes from Northern Arizona University, which cites the manual, "Recreational Trail Design and Construction," developed by the Minnesota Extension Service of the University of Minnesota. It emphasizes the following aspects of recreational cross-country trail layout and construction:

1. Trail layout and length – The trail system should comprise loops with internal connectors and cutoffs that allow the skier discretion in how long to ski. Loop lengths should range from 5 to 15 km with a beginner's loop of about 1 km. Minimum clearing widths should range between 3 and 5 meters, depending on what type of skiing is accommodated and whether a steep section would require herringbone technique uphill or turns downhill. Grades should usually be less than 5% rise over run for general skiing with occasional sustained pitches of 10% and short (less-than-50-m) pitches of up to 25%.
2. Trail construction – Trails should be smooth enough and free from protrusions to accommodate grooming when snow depth reaches 0.3 m. Trails should have gentle curves, especially avoiding sharp turns at the bottom of downhill. Bridges should accommodate the width and weight of grooming and maintenance equipment.
3. Other considerations – Cross-country ski trails are considered compatible with winter snowshoeing and summer hiking and bicycling. They are considered to be incompatible with snowmobiling and wheeled traffic. Cross-country skiing venues should have adequate parking areas, rest areas for skiers, shelters every 15 to 20 km, and appropriate signage.