



February 21, 2023

Monique Nelson  
Alaska Region Planning Director  
Juneau Ranger District  
8510 Mendenhall Loop Road  
Juneau, Alaska 99801

Via: <https://cara.fs2c.usda.gov/Public/CommentInput?Project=53780>

**Re: Comments in support of Thorne Bay Basin Integrated Management Project #62854.**

Dear Ms. Nelson,

Please accept these comments on behalf of Trout Unlimited (TU) on the Mendenhall Glacier Visitor Facility Improvement Project Supplemental Draft Environmental Impact Statement. Trout Unlimited is the nation's largest sporting organization dedicated to coldwater conservation with more than 400 chapters and more than 300,000 supporters nation-wide. Trout Unlimited has more than 20,000 supporters in Alaska that are passionate anglers, business owners, fishing and hunting guides, and commercial fishermen, among other various occupations. Many of TU's members live and work in and around the Tongass National Forest, including the Mendenhall Glacier Recreational Area (MGRA), and rely on its important fish, wildlife and water resources for fishing, hunting, recreation, and for employment in related industries.

The Tongass is the nation's largest national forest, spanning 16.7 million acres that contain thousands of productive salmon, steelhead and trout streams. It produces more wild salmon than any other national forest, accounting for 25% of the entire commercial salmon harvest along the west coast.<sup>1</sup> The Tongass' abundant fish and wildlife, wild landscapes, and famed Inside Passage attracts throngs of visitors to catch wild salmon, view incredible scenery, and experience North America's largest remaining temperate rainforest. Many of these visitors make their way to the MGRA, making it the Tongass' most popular and most visited facility. All told, fishing and tourism accounts for the lion's share of southeast Alaska's economy, supporting 21% of all local employment<sup>2</sup> and contributing \$2 billion to the regional economy.

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<sup>1</sup> U.S. Forest Service, *Tongass Salmon Factsheet* (Mar 2017) available at [https://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/fseprd554592.pdf](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd554592.pdf).

<sup>2</sup> Rain Coast Data, *Southeast Alaska by the Numbers 2022*, prepared for Southeast Conference at 2 (Sep. 2021) available at <https://www.seconference.org/wp-content/uploads/2022/09/SE-by-the-numbers-2022-Final.pdf?2070f3&2070f3>. Importantly, these sectors have room for growth. Employment in these sectors is down currently due to the effects of Covid-19, before which employment in seafood and visitor services accounted for 26% of all regional employment. See Rain Coast Data, *Southeast Alaska by the Numbers 2019*, prepared for Southeast Conference at 5 (Sep. 2019) available at <http://www.seconference.org/sites/default/files/FINAL%20Southeast%20by%20the%20Numbers%202019.pdf>.

Trout Unlimited commends the U.S. Department of Agriculture (USDA) and Forest Service for the Southeast Alaska Sustainability Strategy (SASS), and for focusing “management resources to support forest restoration, recreation and resilience, including for climate, wildlife habitat and watershed improvement.”<sup>3</sup> The wisdom of this new strategy is especially apparent at the MGRA, where visitors see the effects of climate change and the benefits of watershed restoration firsthand.

Restoring the Steep Creek watershed will provide significant benefits to the MGRA, presents a unique opportunity for public education and interpretation, and is an important component of the Mendenhall Glacier Visitor Facility Improvement Project. High-quality trout and salmon habitat abounds in the upper reaches of the Mendenhall Valley. However, roads and other past management activities have also degraded habitat in certain areas that restoration efforts now present an opportunity to correct.

Steep Creek flows into Mendenhall Lake alongside the parking lot at the MGRA visitor center, making it an especially visible salmon stream. Within Steep Creek, sockeye and coho salmon migrate up from the ocean alongside Dolly Varden and sea-run cutthroat trout. Black Bears congregate on the banks, hikers ply along the nearby trail, and many other wildlife species frequent the rich and productive watershed. Unfortunately, the existing culverts on Steep Creek do not adequately provide access to high quality spawning and rearing habitat, and are listed as “red” in the Forest Service database because they fail to meet state and federal standards. With 215 meters of class one salmon habitat upstream, fixing these stream crossings will significantly improve the quality and accessibility of this habitat for trout and salmon. With a properly implemented restoration plan, nearly two thousand square meters of class one habitat could be fully utilized.

Trout Unlimited encourages the Forest Service to correct the “red” culverts, restore Steep Creek, and to incorporate public education and interpretation along the trail throughout the project area. Trout Unlimited has long partnered with the Forest Service on a variety of projects throughout the Tongass, and would be eager to help make this project a success, too. Restoring Steep Creek presents an important opportunity to improve watershed health and to improve access for salmon and other fishes to upstream habitat that is blocked or limited due. Unlocking inaccessible spawning and rearing habitat will improve fish populations and, with it, the wildlife whose livelihood relies on healthy fish populations in their habitat.

Beyond the benefits to fish and wildlife, numerous independent and guided visitors make their way to the MGRA to witness the diverse wildlife that the area. The Mendenhall Glacier is one of the most visited and accessible glaciers in the world, and the MGRA is an integral piece of the statewide tourism industry. The Mendenhall Glacier is one of the top three visitor destinations in the state with around 700,000 visitors annually. As a recreational and employment resource, the MGRA is invaluable to the local Juneau and statewide economy.

The glacier itself has long been a defining feature in the cultural landscape of the Áak’w Kwáan, as well as in the lives of euro-settlers and Juneau residents. The Forest Service seeks to keep the continuity of the MGRA as a recreational and interpretive site by addressing the changing local environment. Trout Unlimited encourages the Forest Service to prioritize watershed restoration at Steep Creek, improving aquatic organism passage, and implementing opportunities for public education

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<sup>3</sup> <https://www.usda.gov/media/press-releases/2021/07/15/usda-announces-southeast-alaska-sustainability-strategy-initiates>

and interpretation that will help the public better understand and appreciate the need to care for and restore impacted salmon habitat.

Thank you for your consideration. Please do not hesitate to reach me at 907.227.1590 or [austin.williams@tu.org](mailto:austin.williams@tu.org) if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Austin Williams', with a stylized, flowing script.

Austin Williams

Alaska Director of Law and Policy