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Organization: Renewable Juneau

Title: Board President

Comments: Subject: MGRA Planning Comments

To: USDA Forest Service

Re: Proposed Action for improvements to Mendenhall Glacier Recreation Area facilities

Date: March 8, 2020

Congratulations to the US Forest Service for releasing your long-awaited proposed action to improve visitor facilities at the Mendenhall Glacier. We submit the following comments on behalf of Renewable Juneau, a non-profit (501 c 3) organization providing Information, education and advocacy to support local climate solutions- renewable energy, heat pumps, electric vehicles, and building efficiency - in Alaska's capital city.

In our 2018 letter to the Forest Service on the same subject we asked for:

- [bull] NO expanded bus parking near the visitor center;
- [bull] NO vehicle access close to the existing facilities;
- [bull] remote parking for cars and buses during the summer with an electric shuttle system to move people to the facilities;
- [bull] facilities which allow climate change to be mitigated by the extensive use of renewable energy coupled with education about sustainability.

We stand by these earlier suggestions and are disappointed that your proposed action includes none of them. Your scoping letter contains no mention of renewable energy use or education about sustainability. Your graphic depictions of changes to buildings, docks and trails, while helpful for improved flow of more visitors, are silent on their purpose in reducing energy consumption or educating visitors about sustainability. Why is there no mention of Net Zero or LEED certifications for buildings? The Forest Service has been planning for these facilities for more than five years and it's disappointing at this point to only comment on conceptual drawings that seem only to harden and expand into the natural space to accommodate more tourists.

Of principal concern is your plan to expand the existing parking lots into sensitive riparian habitat near Steep Creek. While we applaud your ideas to restore Steep Creek upstream for improved habitat and greater separation from the roadway, your expanded downstream parking lot encroaches far too closely on Steep Creek and would bury large amounts of wetlands under rock and asphalt. The result would be increased traffic and congestion very close to sensitive habitat. Far better to reconfigure the existing parking lot for minimal numbers of vehicles and to use a circulating tram as originally proposed.

An alternative to the circulating tram would be to plan for regularly circulating electric buses owned by CBJ and operated by a concessionaire. These would circulate every few minutes and could negate the need to park a dozen buses on an expanded lot. Electric buses could offer service directly from the downtown docks for smooth transition from ship to glacier. They could also continue to Auke Bay and Statter Harbor to serve the whale watch fleet. These same routes could serve the transit needs of Juneau residents quite well. They should be electric because these buses would not threaten the water quality of Steep Creek with leaking oil

pans or fuel tanks. They would also be quiet and smog-free to enhance the visitor experience and most importantly, they would provide an example of Forest Service partnering with CBJ for climate change mitigation.

The city is striving to achieve goals of the Juneau Renewable Energy Strategy (JRES) which seeks to power Juneau's heating, transportation and electricity with 80% renewable energy by the year 2045. Fundamental to the success of this strategy are energy efficiency and the electrification of transportation and heating. We understand the Forest Service has encouraged private tour operators to invest in their own electric buses.

That hasn't happened due to high capital costs that CBJ doesn't face. By expanding the parking lot as proposed, you will essentially "lock-in" several decades of noisy, polluting, diesel buses leaking fuel into Steep Creek. Now is the time to propose limited parking and efficient transit.

We also encourage the Forest Service to avoid a new high volume, marine transportation system on Mendenhall Lake unless it is electric-powered. We see no mention or provision for this in your conceptual drawings of docks and are concerned your final plans will not include circuitry for charging batteries, for example.

Many Juneau residents are concerned about global climate disruptions and are eager to increase awareness of the need to transition away from fossil fuel use and position Juneau as a leader among small cities. Such efforts will make Juneau a more desirable place in which to work and raise families. The MGRA is a foundational segment of the recreational and economic life of Juneau and its management and design should share in reaching community goals such as the JRES.

Sincerely,

Margo Waring

Board President, Renewable Juneau