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Comments: Please see the attached letter

- Katharine

Juneau Ranger District Attn: MGRA NEPA

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This letter is in response to the request for input on the Mendenhall Glacier Visitor Facility Improvement Project (18 February 2020). We have reviewed the information provided in the Mendenhall Glacier Master Plan as well as the documents in the scoping section of the Mendenhall Glacier Visitor Facility Improvement website (<https://www.fs.usda.gov/project/?project=53780>).

The appropriate level of analysis for the proposed improvements is an Environmental Impact Statement (EIS) not an Environmental Assessment (EA):

FSH 1909.15 National Environmental Policy Handbook 21.1(a)(1) indicates that an EIS should be prepared for actions that normally require an EIS. The USFS prepared an EIS for the Mendenhall Glacier Recreation Area Management Plan Revisions (1995) which addressed issues similar to those in the proposed action (e.g. increased capacity for commercial purposes, motorized recreational vehicle/watercraft use, access). These issues were considered to be significant then and remain significant currently.

During development of the 1995 EIS, the USFS undertook a capacity analysis to evaluate different carrying capacities for recreation commercial use of the area. No such study or analysis accompanies the new Mendenhall Glacier Master Plan despite the fact that the request for such information was raised in numerous pre-scoping exercises and in public comments to the project website. The 1995 EIS rejected an option that would not have placed capacity limits on commercial visitation. The USFS has provided no analysis or justification for its proposal to change this. As such, the potential impacts of the proposed improvements are several orders of magnitude higher than previous plans, enforcing the conclusion that an EIS is warranted.

The scope of considerations for the EIS should include impacts to adjacent landowners and neighborhoods that will potentially be impacted by the proposed improvements both directly and indirectly. For example: the Mendenhall Glacier Master Plan envisions a visitor center that can accommodate as many as 4,000 visitors in a 90-minute period. Assuming a tour bus capacity of 50 people (higher volumes would occur if visitors used taxis or cars). If the visitor center ran at only half of its planned capacity for the 11 hours it is operational each day in the summer, this

would result in:

[bull] 40 tour buses every 90 min on local roads

[bull] 280 tour buses a day

At full capacity, where the visitors center is running currently, the impact to local neighborhoods and roads would be

[bull] 80 tour buses every 90 minutes

[bull] 560 tour buses a day.

There is no scenario in which these impacts are non-significant, and as such they need to be addressed in the NEPA process.

The following direct and indirect impacts of the proposed improvements need to be addressed in an EIS:

Law enforcement and crime prevention: The proposed Dredge Lakes parking area on the Glacier Spur Road would provide direct access to a trail running adjacent to the back yards of properties along Gladstone Street. The USFS did not engage adjacent property owners in pre-scoping activities. Gladstone residents are concerned about the potential increase in crime from enhanced access to their properties by persons who could easily leave in their vehicles with stolen goods before the USFS' limited law enforcement capability would be aware of them. During the 1996 EIS process, the USFS documented an average of a reportable law enforcement incident every 3.2 days. Twenty-six (26) percent of these crimes occurred at trailheads. Property crime in Juneau has increased substantially since 1995, and trails and greenways in other areas have been used to burglarize and vandalize dwellings. The USFS needs to consider the indirect effects of its proposed trailhead parking improvements. Additionally, this parking area is located in an area of seasonal flooding from a stream that is cataloged in the Alaska Anadromous Waters Catalog. Hardening the surface for parking is likely to cause flooding of adjacent properties, and impacts to migrating salmon.

Transportation and impacts to neighborhood infrastructure: There is no evidence that the USFS has considered impacts to transportation infrastructure and neighborhoods outside the boundaries of the Mendenhall Glacier Visitor Center (MGVC). This infrastructure is a necessary component of any expansion of visitation to the MGVC and needs to be included in evaluation of direct and indirect effects. A transportation study should be conducted that evaluates affected traffic networks, traffic operations and level of service (LOS), increased bus/taxi/car traffic, impacts to public transportation, impacts to residential neighborhoods. For an example of such a plan for a much smaller level of use, refer to the NOAA/NMFS Juneau Consolidated Facility EIS (1998). The study should include:

- o # of trips including information on type of transportation used to access the MGVC
- o Trip distribution spatially and temporally
- o LOS analysis, traffic volumes, peak hours
- o Mitigation measures to reduce traffic volumes, noise, air pollution, safety issues (children, school zones)

Realistic analysis of local use of the Mendenhall Glacier Recreation Area (MGRA). The USFS has not been clear in the differentiation between use of the MGRA and MGCV when citing statistics on use and activities. No survey of local use outside the MGCV has been conducted and surveys that have been done have only been done during the tourist season. Adequate accounting of all uses of the area is necessary to determine environmental and social impacts of the proposed improvements.

Sincerely,

Katharine Miller