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First name: Karla

Last name: Hart

Organization:

Title:

Comments: Regional Forester David E. Schmid

USDA Forest Service, Alaska Region

P.O. Box 21628

709 W. 9th Street

Juneau, AK 99802-1628

June 17, 2023?

Dear Mr. Schmid,

This letter represents my formal objection to the draft Record of Decision for the Mendenhall Glacier Recreation Visitor Facility Improvements project under the 36 CFR 218 Pre-decisional Administrative Review Process.

I provided written comments in response to scoping on March 18, 2020, on the DEIS on May 8, 2021, and on the SDEIS on February 21, 2023 which gives me standing to object to the project.

??->My first issue of objection is one that I was not aware of until February 27, 2023.??James King, one of the owners of IRIDE ALASKA , has a day job as the Director, Recreation, Lands, and Minerals, for the Alaska Region of the Forest Service. At the first Assembly Meeting where the use of the Pioneer Road was considered, James introduced himself, following copied from the meeting transcript

"Mr. James King, a Sunny Point resident, said that he grew up in Juneau and was the first Director of TrailMix and worked as the Director of State Parks and spent most of his life working on trails and recreation. He said that he loves to mountain bike."?

He failed to note his present position with the Forest Service, which he has held for 7+ years; however, noted State Parks (perhaps 14 years ago), and Trail Mix (first hired ED at founding). This error of omission could not have been accidental.

Why is this so important? Because James is driving hard on the massive expansion at the Mendenhall Recreation area and has been for at least four years (see this 2019 presentation, apparently to the Assembly, and note the last page where he is presented as the contact).

The Mendenhall expansion project is driven by the massive growth in the cruise industry and drive for more shore excursion opportunities to accommodate this growth. Through the project, James has undoubtedly been in contact with cruise officials and shore excursion operators (I have no records to prove this). One of the key elements of the new plan is a 14 foot wide "bike path" along the south shore of the Mendenhall Lake.

So now we have a federal official with massive involvement in a project that links with the cruise industry and has a bicycle component entering into business that offers electric bicycle and segway shore excursions to cruise ship passengers. His business success is directly tied to the cruise industry, which further has the ability to feature and funnel more (or less) guests to him.

He appears to have not disclosed this business interest or possible conflict to the Forest Service. He has not recused himself from involvement in the planning at the Mendenhall (though by the time he became a partner in the business, this could be more of a "golden parachute" thanks for work done rather than to seriously influence things going forward, I don't know).

While he is added as an owner to IRIDE ALASKA business license on November 29, 2022, photos shared when they was applying for the Pioneer Road show them on ebikes, on the Pioneer Road, in the summer. There is a review of the tour posted in Expedia in September 2022 from Sara M (note that James has a sister who does not live in Juneau now, who is named Sara McDaniel, and it appears they did a family trip for photos and to get some reviews out, a perfectly legitimate thing to do, excepting the ethics issues re the Forest Service job). Key point for this objection, at least by September of 2022 this business was in the works.

??SUGGESTED REMEDY: the entire project is flawed by this extreme conflict of interest by this Region-level Forest Service employee. He should be removed from any involvement and the Forest Service Juneau Ranger District Ranger should take the lead on re-evaluating this project.

??-> My second objection regards the altering of the Dredge Lakes Management Unit Boundary and the breach of trust in allowing commercial use in the Dredge Lakes Management Unit, on portions of the Moraine Trail that are in the no commercial use agreed area (possible to do because the public had been barred from the area due to bear management issues, little did we know that the Forest Service had granted permission for Gastineau Guides to build an access from the commercial bus overflow parking (where residents are not likely to be) to the Moraine Trail and to use what was now essentially a private trail, against the agreement of no commercial use. ??The no commercial use of Dredge Lakes was established many years ago in a community-wide process to identify a few areas that would not be commercialized, providing some relief from ever-expanding commercial use of trails.??With this SDEIS, the Forest Service proposes to further violate our trust by pulling a game of boundary change so that the area they propose to develop will no longer be in the Dredge Lakes unit, even though it is the same precious lakeshore area. I am reminded of Israel and Palestine and Israel continuing to expand their boundaries, squeezing out Palestine. ??

Proposed Remedy: 1. Maintain the existing Dredge Lakes boundary and end commercial use within the Dredge Lakes boundary. 2. IF a shore line trail is to be built, it should be clearly stated that it is only for NON-COMMERCIAL USE, in perpetuity. If this is not acceptable, then trade. Take the shore line area for commercial use and make East Glacier Trail non-commercial use only.??-> My third object again raises an issue that I was unaware of until very recently. It relates to the non-commercial use of the Dredge Lakes area. The Forest Service proposal to incorporate the trails of Dredge Lakes into the national trail system apparently opens the opportunity for the District Ranger to allow commercial use without any public process. Again, there is a high level of distrust for this process and an ongoing erosion of non-commercial management. I object to the inclusion of the trails in the system if what I hear is true re the ease of converting to commercial use.??Remedy: either leave Dredge unit alone entirely, and do nothing with the trails or create some solid, unchangeable mechanism to ensure that Dredge remains only for non-commercial use, even with improved trails.?

-> My forth objection relates to the recreation cabins in the campground. I suggested that it would have less impact on other users to cluster the cabins rather than placing them among the camping spaces. This clustering is done in many public campgrounds with cabins and yurts. Further, clustering the cabins in an area of the campground that already has electricity would allow you to have cabins that are heated by electricity, not wood. There is a winter burn ban on wood stoves in the Mendenhall Valley because of a temperature inversion that traps dangerous particulates. Installing wood-stove heated cabins when you could do cabins with electric heaters makes no sense. Again, public use cabins I have used in campgrounds down south are heated with electric heaters. That is sustainable, clean, safer and doesn't cause air quality issues. ??The size of the cabins is far larger than need be or is in harmony with placing within the campground. Cabins this big will be hard to heat when it is cold and invite big parties, which are likely to be disruptive to other campground users and even neighboring residents. ??REMEDY: Make the cabins similar size to existing FS cabins in the Juneau area, some to sleep 4-6 like Peterson Lake cabin and some larger like John Muir, but not 800 square feet! Make them electric heated. Cluster them.??

-> My fifth objection relates to the placement of the massive welcome center in the glacier view shed. My preference was for this to be placed back in the existing bus parking area. It is an eyesore as presented and completely mars the visual integrity of the area. An alternative which I supported in my comments was that proposed by Laurie Craig to place it into the hillside in the area of the current ADA ramp to the existing visitor center. If you are going to make massive development, make it with architectural and view shed integrity.??

-> My sixth objection is who will review objections. James King's involvement from the regional office in the development of the project from the earliest stages makes regional office review very suspect. I urge that the objections for this EIS be sent for review outside of the Alaska region, if you want to rebuild any integrity.??

-> I support the decision of no motorized vessels on the lake and am registering this support here to say that if there are objections to that aspect of the decision filed, I urge the Forest Service to stand strong on no motorized vessels on the lake.?

Unfortunately, the public has had no say over the timing of this process and the SDEIS was released at a time when I do not have capacity to give the attention and objections that I would were it released at a different time. My lack of noted objections on other aspects is not an indication of support, but rather that of a citizen who is doing this without the support of a consultants, on a timeline of the agency's choosing, and has little faith in this process or the product.??Ideally, you will look at the compromised involvement of James King on this project and step back to take another look.??I am leaving on an 8 week trip. Note that this trip is motivated by the incessant helicopter noise over my house, thanks to Forest Service permitting of glacier landings (the cumulative impact of which is not addressed well in the entire EEIS). I will be back in Juneau and available to meet August 14-18.