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First name: Marina

Last name: Lindsey

Organization:

Title:

Comments: MGRA Project

I am writing to comment on the proposed changes to the Mendenhall Glacier Recreation Area (MGRA) as described in the December 16, 2020 scoping letter. I am relieved that an Environmental Impact Statement is going to be written to review the potential impacts of the proposed MGRA changes.

How will the MGRA changes attain the master plan's theme to "protect the spaces that Juneau residents use?" Many years ago, I stopped going to the MGRA from May through September due to extreme overcrowding by commercial tourists. I used to try to figure out the days with fewer cruise ships in port, and hike the East Glacier trail on those days, during times that hiking tours were not scheduled to be on the trail. But as the number of cruise ship passengers has increased and the number of hiking tours, I have stopped going to the MGRA during the most beautiful months of the year. That means I don't walk to Nugget Falls; I don't hike the East Glacier Trail; I don't ride my bike to the glacier. It is too congested with commercial tourists and large, smelly buses, and is far from a relaxing, nature experience. I have also greatly reduced my hikes in the West Glacier area from May to September, and now the USFS is proposing even more commercial tourism on that side of the Mendenhall Lake. How are Juneau resident's supposed to enjoy the MGRA during the spring and summer months?

I am also curious how the USFS is going to fund this enormous project. Are you considering partnerships with commercial entities? If yes, how will the interests of those partners be balanced with protecting "the spaces that Juneau residents use?" How will the City and Borough of Juneau be compensated for the costs of the USFS and its commercial partners bringing tourists to the MGRA on Juneau's roads and through Juneau's neighborhoods?

Following are my comments on specific sections of the scoping letter.

Why is this project needed?

You state: "The purpose of the project is to meet Forest Plan's goals and objectives to provide a range of sustainable recreation opportunities consistent with public demand emphasizing locally popular recreation places and those important to the tourism industry, while protecting outstanding scenery, fish and wildlife habitat, and to support local and regional economies. The current level of demand results in a diminished user experience and the potential for environmental impacts." The 2019 Mendenhall Glacier Master Plan estimated about 700,000 visitors to the MGRA in 2017. You then note that the MGRA is currently exceeding capacity determinations, and state that "Several project elements also benefit the local Juneau residents, regardless of tourism numbers."

I strongly agree that the current level of demand results in a diminished user experience and has environmental impacts. Who are the visitors that you are counting in your 700,000 figure - are they locals, independent travelers, or cruise ship tourists? And how did you calculate "diminished user experience"? What are the criteria for user experience? Does that calculation include the experience of locals and independent tourists? How is the MGRA Facility Improvements Project going to "benefit local Juneau residents, regardless of tourism numbers?" As you noted, the area is already overwhelmed by tourists late May through September - a period now expanding with cruise ship schedules to April into October.

Transportation -Parking and Access - expansion:

I do not support the filling of ZigZag pond to create parking. The pond is both fish and beaver habitat, as well as a food source for the bears and birds. People go to the MGRA to see wildlife. What are the other alternatives for a

parking lot farther away from such prime habitat?

Electric buses should be mandated through a phased-in approach. They would reduce the noise and smell of the diesel buses, and they would reduce the environmental impact of so many people being shuttled to see a glacier that is receding due to climate change and rising temperatures. Electric passenger vehicles should be given priority parking areas, and vehicle plug-ins should be provided for Juneau residents and electric rental cars.

Additionally, a study was published in Science Magazine, (Science 08 Jan 2021: Vol. 371, Issue 6525, pp. 185-189, DOI: 10.1126/science.abd6951), which found that leachate from new and aged tire tread wear particles, specifically a compound, called 6PPD-quinone, an oxidation product of an additive intended to prevent damage to tire rubber from ozone, adversely impacts salmon. How is the MGRA going to protect the salmon in Steep Creek and Mendenhall Lake from the tires of the increasing number of vehicles transporting tourists down the Spur Road to the glacier?

Facility-Welcome Center Complex - new

A single story, 18,000 square-foot Welcome Center will have a huge footprint. What is the reason for it being one-story? Is a 2-story building being considered to reduce the footprint and wildlife habitat that would be disturbed by such a large building?

Facility Visitor Center - expansion:

We need more information about the expansion like the square footage. Are environmental building practices for energy conservation and material sourcing going to be used?

Trails -Glacier Spur Road Trailheads - new:

I support and appreciate the paving of trailheads, since they are just small dirt pull outs, currently. However, I am concerned about preserving the non-commercial use of Dredge Lakes. Will the Dredge Lakes area remain a non-commercial use area?

Trails -Lakeshore Trail - new:

Why does this trail need to be 14' wide? What does a National Forest System (NFS) trail designation mean for the user-created trails? Will the 14' trail be closed to motorized vehicles year-round? What are the impacts of this proposed trail going to be on the campground, the houses near the campground, and the residential use of Montana Creek Road? Are the walk-in campsites under-used? Is that why they are going to be paved for a parking lot? How was this location chosen?

Habitat Restoration -Steep Creek:

You state: "About 1,500 feet of Steep Creek would be realigned and restored to provide improved salmon habitat and develop an appropriate floodplain with a balanced movement of creek substrates." Please provide more specifics about what "improved habitat" is, and how you propose to realign a creek that already has a declining population of salmon and dolly varden in it.

You state: "The two existing perched culverts under Glacier Spur Road would be replaced with a vehicular bridge to improve aquatic organism passage and provide for a pedestrian and wildlife underpass." How will the underpass be designed so that wildlife can use it during the day when thousands of tourists are at the glacier? How will a bridge be constructed without harming fish and other wildlife in the area? How the USFS is going to protect fish from the chemicals in road runoff as well as tires. See: Science 08 Jan 2021: Vol. 371, Issue 6525,

pp. 185-189, DOI: 10.1126/science.abd6951 mentioned in the Transportation section of my comments.

"A wildlife corridor could be established on the south side of Steep Creek to allow wildlife movement under the bridge." Again, we need more information about the potential impacts to wildlife during construction and the rate of success for getting wildlife to use corridors in heavily pedestrian and vehicle trafficked areas.

Visitor Experience - Steep Creek Fish Viewing Window - new:

"A fish viewing facility would be installed in the realigned Steep Creek west of Glacier Spur Road to provide an underwater view of the stream. The viewing room would be accessible by ramps and stairs from the Steep Creek Trail." We need more information about the scope of the proposed viewing window and the potential impacts to wildlife and fish habitat to construct such a viewing facility.

Visitor Experience - Public Use Cabins - new

I am a supporter of public use cabins, and I suggest you talk to the State of Alaska, Department of Natural Resources about the users at their road accessible cabins, so you can implement the means to deter excessive partying, human waste, and trash near those cabins. Will the cabins be open for winter use? The campground is usually closed in the winter and the roads are used as XC ski trails and walking trails by Juneau residents. If the cabins are open for winter use, that will impact local use of the campground.

Facility- Boat Docks and Related Support Facilities - new:

Please keep commercial tourists on one side of the lake. If you're going to have them "touch the ice", take them via a slow moving, electric powered boat from the Visitor Center and then take them back to the Visitor Center. Please don't spread the commercial tourists out over the entire MGRA.

Adding boats, docks and a launch ramp, will increase commercial use and noise significantly on the west side of the lake. Boats will greatly impact the experience of non-commercial visitors seeking a wildlife experience, as well as residents of the Montana Creek neighborhood, who probably moved to that neighborhood because it is near a quiet lake and hiking trails. It appears that you are only taking into consideration the benefits to commercial tourists with this expansion of the MGRA. Residents of Juneau and independent travelers will not be able to use the docks, nor the boat ramp, but they will be significantly impacted by their addition to the MGRA.

How have you clarified the limits for boat use? How will those limits "protect the spaces that Juneau residents use?" Boats for 49 passengers are big boats! Electric boat motors would help with noise and pollution, and should be mandated. Speed limits should be specific, and we need to know how they are going to be enforced. Regulations are easy to write; enforcement is expensive. How will adding motorized boats to the lake impact the salmon, nesting birds, and other wildlife in the area? How many boats will you allow on the lake at one time? How will those boats affect commercial and non-commercial kayakers? Are you also going to allow commercial kayaking on the lake? What about jet skis? Will they be allowed on the lake? What about the value of looking at a quiet, undisturbed lake?

You will also be adding "A fenced, upland winter storage area" for winter storage. Where exactly will this be and what are the dimensions? Many Juneau residents walk and xc ski along the lake shore.

Facility - Remote Glacier Visitor Area

In 2015, the total capacity for the entire West Glacier Unit (the west side of the lake - now rezoned as the Remote Glacier Visitor Area) was 150,552 visits with 33% allocated to commercial use (about 50,000 visits). In just five years, the proposed total capacity would be 368,682 with 80% allocated to commercial use (295,000 visits). This

590% (295,000/50,000 visits) increase in commercial use will primarily take place on a much smaller subset of acreage - the old ice caves area at the northwest portion of the lake.

How are you increasing the capacity for the West Glacier area without providing the number of commercial visitors in that unit? The trail monitoring data should also help provide information on non-commercial visitors.

Trails - West Glacier Spur Trail expansion:

How many new commercial hiking tours will be permitted on the "upgraded and realigned" west glacier spur trail? How will you compensate for the impacts to Juneau residents who use the West Glacier trail hike and to access the Mt. McGuinness trail? We have already been squeezed off the East Glacier trails from May-September/October. Are we going to be squeezed off these trails too?

And again, more parking because there will be so many more vehicles and buses. The access to this side of the lake is a road maintained at the cost of the city, and built for residential use. Are you going to analyze the impacts to the Montana Creek neighborhood and the neighborhoods along Back Loop Road that commercial vehicles will use to transport boats and 295,000 people? Will the City and Borough of Juneau be compensated for the additional road maintenance and any changes that are necessary to minimize the impacts to residents? And, where is the parking going to go, in addition to the new storage building and fencing in the West Glacier area?

Visitor Capacity- adjustments:

"Proposed elements of this project were also reviewed in context of the existing 1996 MGRA Management Plan to identify places that plan would require updates if those elements were to be selected in a decision for this project." What did this review consist of and will it be shared on a public website?

"Overall visitor capacity for the MGRA will be increased to accommodate the proposed recreational facilities and sites, and to respond to the project purpose and need regarding current visitor numbers being at or above capacity allocations (2015 Decision Notice). This is achieved by adjustments to specific trails, sites, or facilities based on existing or proposed use, including review of known monitoring data." What did the monitoring show and how was it incorporated into the capacity? How are non-commercial users being calculated and incorporated into the capacity determination? Have non-commercial users been surveyed about their use and experiences at MGRA?

"Management zone boundaries will be adjusted to better group together similar activities and facilities proposed in this project." Will these management boundaries take into consideration residents of Juneau and independent tourists?

"Recreational Opportunity Spectrum (ROS) is a descriptive system used to portray user experience and is based on several factors." Does the ROS portray the experiences of residents of Juneau and independent tourists?

Thank you for your consideration of my comments and for answering my questions in your draft EIS. I look forward to reading the analysis.

Sincerely,

Marina Lindsey

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