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Title:

Comments: Mendenhall Glacier Visitor Facility Improvements Project Comments 1/15/21

Dear Forest Service Team,

I appreciate that the Forest Service has announced that they have decided to conduct a full EIS on the expansive "Mendenhall Glacier Visitor Facility Improvements Project." The time frame for comments, when this action was not anticipated by the public, of December 16, 2020 - January 15, 2021 results in a distracted public, especially with the pandemic and unprecedented national politics making this not a normal 30 days. I urge you to consider extending the comment period by at least two weeks. It is less than three hours until the midnight deadline on January 15 and I have not had time to prepare as thorough of analysis and comments as I would like. What you are getting is my first draft brain dump so that I can get as much as possible onto the record.

The timeline the Forest Service has outlined in the Federal Register, with a draft EIS expected July 2021 and a final in January 2022, indicates that the Forest Service does not anticipate doing substantial research or analysis to address alternatives and impacts in what is a highly controversial (and unpopular given the local resident comments submitted in the spring of 2020) project. Further, there is no clear sign of when the cruise industry will resume sailings to Juneau. My review of industry projections indicate that Alaska is unlikely to have much, if any, cruising of ships larger than 500 passengers in 2021. What state the industry will be in when they are able to resume sailing is the subject of much speculation as well.

In 2019, there was acknowledgement of overtourism from the cruise industry in Juneau, from the residents and industry, throughout the City and Borough of Juneau, not just at the Mendenhall. Residents were already starting to talk of imposing limits on cruise tourism. Building infrastructure to accommodate more cruise passengers in the Mendenhall Glacier Recreation Area runs counter to community self-determination.

Purpose and Need:

"to provide a range of sustainable recreation opportunities" there is nothing sustainable about this plan to expand capacity for a highly polluting and unsustainable industry that burns massive quantities of fossil fuels so people can pop into the glacier for an hour to a half day of extinction tourism. The range is highly developed and extremely highly developed, with an emphasis on tourist.

"The current level of demand results in a diminished user experience and the potential for environmental impacts." Understatement. The present overtourism results in the displacement of local and stay over visitors.

Mendenhall Glacier Visitor Facility Improvement Project

This project proposes major management and infrastructure changes to the Mendenhall Glacier Recreation Area (MGRA), yet treats the changes as if they are all facility improvements. During the February 2020 open house all questions and comments that I had that were operational or for infrastructure that might serve locals and non-cruise visitors were verbally dismissed as not being part of this project. This was a continuation of my experience with the public process that began years before with design charettes and such at the Ranger office.

I reiterate my comments already on record from 2020 and add additional, especially as relate to the full EIS, alternatives, and needed studies/information.

Alternative A - no action. Project out what may actually happen with the cruise industry post-pandemic and as a result of upcoming community elections.

Alternative B - Work backwards from existing infrastructure and facilities to document the capacity to provide quality experiences to visitors (cruise and stay over) and locals. Work through social and economic analyses of how limiting capacity at the MGRA to allow unconstrained resident access plus an appropriate level of commercial use to coexist to provide a quality user experience for all. During the summer of 2020 you had a unique data collection opportunity to establish baseline community use without displacement from tourism crowds and helicopter noise. Hopefully the Forest Service did not fail to use this opportunity, especially in light of your development plans. There are strong indications that many people will not return to prior regular scheduled work in office buildings. This means more Juneau residents will be working within a short distance of the MGRA and more likely to want to pop over to recreate during the days. This major shift in society must be taken into consideration while preparing a plan that looks 20 years forward. Consider adopted community sustainability goals, support for stay over tourism, and growing anti-cruise sentiment compounded with uncertainties of cruising in a post-pandemic world.

Develop a clear management strategy that uses existing infrastructure and set capacity limits and scheduling/permitting to meet those limits. Just as the Forest Service issues special use permits for Pack Creek Bear Viewing Area, you have the authority and capacity to limit commercial use at the Mendenhall.

Alternative C - Develop a management infrastructure plan that serves to prioritize and support stay over tourism and local community recreation and wildlife conservation and quality viewing over unlimited cruise passenger visits. Instead of building things for two hour excursions, consider ways to develop the destination so that stay over visitors learn to allocate two full days of exploring and learning in the recreation area. Less people, more wider community economic benefit, more potential for developing a deeper understanding of the Tongass and MGRA, less carbon footprint per visitor, and more infrastructure that will serve locals as well.

Alternative D - Develop a plan that looks at what is needed to have a maximum of 500,000 cruise visitors.

Alternative D - The Forest Service proposal

Federal Register, Dear Interested Party letter, and Management Unit boundary changes proposed.

The changes to the boundaries of the proposed management units feels almost snuck in. I don't note mention in the letter or federal register. If it is, I've missed it in two read throughs so it certainly is not given any prominence for the significance of these proposed changes.

I strongly object to proposed changed the management unit boundaries.

[https://www.fs.usda.gov/nfs/11558/www/nepa/109051\\_FSPLT3\\_5542068.pdf](https://www.fs.usda.gov/nfs/11558/www/nepa/109051_FSPLT3_5542068.pdf)

The DEIS must explain in clear detail, including comparative maps, what those changes mean for management and infrastructure in every area proposed changed. I believe they have a lot of management implications, including relating to capacities and commercial use.

Why is the lake surface being placed into a management unit? It was not before. What is the relationship with the State and navigable waters and the Forest Service? How does the Forest Service presently manage the lake with respect to the three adjacent management units? To my eye, it appears the lake is being included to allow inclusion of the entire south shore of the lake into the Visitor Center Unit when it is now in Dredge Lakes Unit, as well as possibly allowing for the dock/launch area on the west side to be outside of the constraints of the West Glacier Unit.

You assert commitment "to an open, transparent, and inclusive process." You have a lot of work to do in your presentation and analysis and justification of these boundary changes.

#### Cumulative Impacts and Off-Site Impacts

You should prepare a thorough analysis that addresses the cumulative impacts of what is proposed combined with existing use. For noise. For traffic. For CO2 emissions from tour-related activities. This should also take into account displacement of locals and where they go to get away from an over-developed and over-crowded Mendenhall Recreation area, including additional driving to escape crowds that some of us now feel forced to do.

#### Climate Change and Sustainability Goals of Juneau

Juneau has adopted sustainability goals that reflect community values to reduce our carbon footprint. Cruise ships and related activity are hugely counter to those goals. The buses which are now used in Juneau are mostly buses that do not meet emission standards in California and Washington and so are shipped to Juneau. Diesel buses idling in front of the receding Mendenhall Glacier create a telling picture. There should be an analysis that addresses climate change and looks at the CO2 budget of each alternative and an alternative that requires zero carbon mass transportation (either electric or hydrogen buses or an electric fixed rail system).

#### Comments on "What is Being Proposed"

##### "Transportation - Parking and Access - expansion"

No to the expansion of parking lots near the glacier. No to a visitor center that will block the view of the lake from the existing parking lot. Don't put more glass between people and nature. They can do that from the cruise ship or with a video. That is not why they go to the glacier. Let them feel the wind, the rain, the sun, the bugs, whatever. If that is not what they want, then perhaps they should just watch a video from home or a ship.

The kettle pond that you propose to fill for parking is a precious bit of nature where I watch for signs of wildlife activity and for waters to rise and fall and ice to build and melt.

Move all of the parking back to the existing gravel lot about 1/4 mile south of the main parking area, as well as the welcome center complex. Keep development away from the lakeshore and offer excellent walking alternatives and an electric shuttle option for those who cannot make the walk. Design and structure that the best option is to walk. Keep the existing middle parking lot entirely for non-commercial local use. Reconfigure the lot closest the glacier to allow for safe passage of the electric shuttle service, but with a priority on pedestrian traffic.

Absolutely no to maintenance, storage, administrative offices, and food service in a welcome center next to the lake. That runs completely counter to the presently undeveloped shoreline and natural setting. There are administrative offices and shops at the Juneau Ranger District office just a short distance from the proposed Welcome Center complex. Make better use of those, especially in light of changes to workforce post-covid, and don't duplicate.

While center manager, John Neary first presented some grand proposals in presentations around town. While I was concerned with the scale, I appreciated the intention to move development and vehicles away from the lake and to make a model of sustainability. All of the good from his plans seems to have been lost.

Non-point source pollution can be devastating to salmonids (and probably to other nature but we haven't yet studied enough). For no other reason, that is why the buses and main parking should be moved back 1/4+ miles from the lake and carefully buffered and bermed from the watershed. In 2017, we learned that copper in brake pads had joined oil, fuel, and chemical fluids in storm water in killing coho in Puget Sound watersheds. In late

2020, we learned of a chemical (6-PPD) in vehicle tires is killing coho salmon. I don't know what monitoring and study has been done with the city "storing" snow at that parking lot in the winter, but if that is to continue, then some study should be done.

You don't address parking and transportation to the West side here. Is it somewhere else or an oversight? The cumulative impacts of all of the traffic, including noise and hardened surfaces, must be quantified.

#### Visitor Center Expansion

Are you really proposing to expand the visitor center to help people stand in line to go into a windowless theater and watch a video instead of going out in nature? Think about how ridiculous that is. If you want to have a bigger better theatre setup, then build that into a new welcome center next to the bus parking lot, both of which are 1/4 mile away from the lake. And if you build the center 1/4 mile away from the lake, you could build two stories with views of the glacier from the top floor and a theater and administrative offices and storage on the bottom floor. Landscape/design it earthbermed so that the second floor functions as a ground floor as well.

While you are planning expansion and another space with offices, remove administrative offices from the building and consolidate them in a new welcome center away from the lake and find a way to reopen the original Visitor Center ground floor entry and allow the public to come and go through that beautiful entry as an option to the ADA entry above.

#### Glacier Spur Road Trailheads

I look forward to seeing details on what is proposed and to commenting on the details. Note that I am unhappy to learn that commercial use of the Glacier Moraine Trail in the Dredge Lakes Unit has been happening with an access trail off of the gravel bus parking lot, while the locals have had traditional access to that area from the East side closed off for reasons of bears. I am not objecting to the closure off of Steep Creek Trail; however, I was involved in some of the discussions and allocations of commercial and non-commercial trails in Juneau decades ago. Dredge Lakes was specified as non-commercial. I understood, and believe those in the conversation did as well, that we were talking the management unit. This is an erosion of that agreement. I would like to see no commercial use in the Dredge Lakes Unit, all the way to the shoreline of Mendenhall Lake. This is another example of decisions made in favor of commercial operators the betrays public trust of what we thought was a deal made.

#### Nugget Falls Trail

Do not harden the lakeshore trail of the Nugget Falls loop as you have the other. Leave the stepping stones (they're great) and give an alternative experience. The construction of more and more hardened trails continues to disassociate people with nature. Puddles, soft areas, and a softer surface all offer a lot for connection with nature and are easier on aging joints. I used to guide hikes and was intrigued that many people aren't even familiar with getting their feet muddy or wet. This is an immersive opportunity. And the trail doesn't need to be always passable. Let it flood when the water is high. Create a couple of key connective routes back to the main trail.

#### Lakeshore Trail

NO.

You mention trail system loop around the "edge of the Dredge Lakes management unit." By implication to a reader, this would be a non-commercial trail on the inside edge of the unit. In reality though, you mean to build this trail on land taken from the Dredge Lakes management unit and put into the Visitor Center Management Unit

which would allow for commercial use. This has not been presented in an open and honest manner. I hope that if it remains in any proposals moving forward, it will be.

While I would undoubtedly use that trail if it were constructed, one of the reasons is that I already use that area. Only now, I use it to escape crowds and developed infrastructure and enjoy nature. I like having the option for user created trails and that not all trails are developed to NFS standards, or beyond. This is an area of rich wildlife habitat in the heart of the Mendenhall Valley. Leave it alone. Building a trail that creates a barrier between uplands and lake will change things for wildlife. It will introduce further traffic, litter, commotion, impacts. The proposed trail is actually a road. It is stated that the trail will be non-motorized. Will this mean no electric bikes? If electric bikes are allowed, will Segways be allowed? Electric scooters? Electric motor cycles (in Beijing they outlawed motorbikes but allowed electric bikes, now they have fast and silent electric motorcycles and scooters in huge numbers never anticipated)? Electric trikes? Where will you set the limit?

I object to building any parking in the campground for the trail. This will literally drive more vehicle traffic through what is to be a tranquil area. Now it is a pleasant place for a walk or a bike with kids. That aspect will be destroyed if you put parking into the campground. I have stayed in campgrounds that were bisected by trail that connected places. These are the type of campgrounds you have to be really careful things don't go missing. Through trails like this are not compatible with a campground.

The campground gets heavy use from locals on summer weekends. It used to get a lot of use by visitors before the ferry service became so bad. Encouraging people who are not overnighing to picnic there is a recipe for bear issues for the campers.

The other trails in the Dredge Lakes Management Unit don't need Forest Service attention or "improvement." Not everything needs to be built, hardened and graded. This is an area where locals can still go and recreate and feel as if they are not in Disneyland or a down south park.

#### Steep Creek Habitat Restoration

I support replacing the perched culverts and providing wildlife passageway. I do not support incorporating pedestrian access and regrading the highway to achieve pedestrian level heights below the bridge. Leave that area for the wildlife. By moving the main parking for all commercial use back to 1/4 mile from the lake at the existing gravel overflow bus lot you will relieve much traffic and make this expensive construction of road grading unneeded. The bears don't need the same height, nor surfaces, under the bridge as do people. Build it for bears and fish and porcupines.

You must provide detailed information on how and when (specific months) you propose to realign and restore Steep Creek. Steep Creek was aligned as it is long ago in salmon lifetimes. Given that there are salmon and dolly varden in one or more lifecycles in the stream at all times of the year, I fail to see how you can realign without harm. Further, we've seen lots of flooding and drought conditions in recent years. Can you provide at least a couple of examples of successful stream realignments with similar fish species and conditions? Examples where coho salmon have survived extreme water ranges and velocities, freezing, thawing, etc. as we have. What plans will be made to ensure that the stock from that individual stream is protected from plans gone wrong?

What happens to the bears that will undoubtedly be displaced during construction? How will they be managed? How will they be able to access wild foods and not be food conditioned in the area? Please provide details on timing and planning.

The bear viewing, a key attraction for the Mendenhall now, relies on salmon. If you mess this up, you lose the salmon and the bears. I urge you to leave Steep Creek alone.

## Steep Creek Trail expansion/realignment

Is this necessary if you do not realign Steep Creek and if you do not expand visitor capacity? The materials available online do make it easy to find any illustrations of the proposed changes. I reserve the right to protest this once details are provided. I use the Steep Creek trail to access the East Glacier / Nugget Creek trails because it is less busy and developed than going past the visitor center and that is my strong preference.

If you are making viewing overlooks, you could develop a few separated photographer platforms that would not be subject to movement from people on any boardwalk or platform. This needn't be anything that extends further or anything, just with unshared foundation pilings and a small gap between the steady photography platform and the main decking. These could be reserved or booked directly at the glacier (making them something locals would have ready access to, not just for booked tours).

## Steep Creek Fish Viewing Window

There is a fish passage window and exhibit at the DIPAC hatchery. This is more unneeded built environment stuff that risks harming the natural fish runs and will require more management and compete with the DIPAC visitor center. In times of pandemic awareness, building a "viewing room" which will likely be cool and damp with people crowding in for looks sounds a bad, even dangerous, idea.

If you do keep this idea moving forward, include not just infrastructure design but details on operation, ventilation, access hours, vandalism proof strategy, etc.

## Public Use Cabins

I support the idea of public use cabins in the Mendenhall if run by the Forest Service or a local non-profit. I do not support if they will be part of any private for profit enterprise and/or part of a strategy to privatize management of the campground. While this is billed as facility improvements, the Forest Service must include detailed descriptions of planned management and operations as well.

I object to the cabins being developed at the locations specified. I have stayed in many western campgrounds that include public use cabins or yurts. They tend to be clustered in location so that like uses are together and to make it easier to service and maintain them. This also means if you are not in a cabin, you aren't listening to/looking at the people who are. I would suggest that spaces 46-51 would be the most appropriate based on my experiences and knowledge of the Mendenhall Campground.

During early scoping meetings I proposed the development of a hiker/biker area at the Mendenhall and was told that was not within the scope of this project. With cabins added, I will again propose that a hiker/biker camp area be developed. If you are not familiar with these, I reference the Oregon State Parks as a leader, though I've also stayed at these on National Forests in Washington. This is a non-reserved area that charges a flat per person fee (\$5-\$10 is typical) to people who arrive on foot or bike. Nobody is turned away and additional space is found for another small tent if needed. Typically only allowed to stay for a couple of nights maximum. In my biggest dreams, there might be a large covered area (could even be a fancy tarp situation under which tents could be pitched. I stayed at a few of those in wet places in Asia. I am available to provide more details and specific references on design and management.

I support a basic small host cabin at host site 70.

## Boat Docks and Related Support Facilities

I strongly object to the motorized boat plan at all.

I object to the launch ramps being developed at all. They will create more traffic on the West side, which has impacts beyond the Forest boundaries. There should be NO consideration of any launch ramp near Skaters Cabin. That is an historic area that is not open to commercial use and heavily used and enjoyed by locals. To mar the view shed and further mar the soundscape is wrong.

I object to any upland seasonal storage within 1/4 mile of the lake and on any area that is converted from nature to storage. If docks are allowed, they must be planned so that all infrastructure is removed from the lake before freeze up and stored away from the lake. During the winter there is likely storage space available at the Juneau Ranger District facility or will be in whatever bus parking is developed on the East Side. Such design and seasonal removal to storage off-site must be factored into the cost of doing business. A fenced upland winter storage next to the West Glacier Parking lot is offensive. More destruction of nature and loss of public access for commercial use. During the winter the Mendenhall is NOT a closed up summer attraction, it is a valuable part of the Juneau community. Those of you working on this plan probably do not know that until Alaska Travel Adventures started doing their raft trips and didn't like having to deal with locals using the same area that they launch, the public had access to the beach and there were no gates or barriers. In the 1980s this area was closed off and commercial operators have keys while locals can walk their boats down through a trail.

Putting a dock up in front of the glacier is a recipe for expensive fixes and modifications as whatever you build needs to be tweaked. Everything should be designed to be completely removable, no pilings. And, everything should be completely removed and stored off site in an existing hardened area such as the existing Juneau Ranger District facility every year.

I strongly object to power boats for anything but rescues. I strongly object to commercial guided boats of up to 49 passengers. Absolutely no fossil fuel boats should be allowed on the lake. The Forest Service should budget for an electric rescue boat or provide assistance for local emergency services to get one.

In any plan and analysis that includes boats, I would like to see specified an absolutely maximum decibels each, how that is determined, and the cumulative decibels of all that would be operating at the same time and justification for the decibel maximum. In addition, there must be a cumulative impact analysis of anthropogenic noise in the area that includes helicopters flying overhead, bus traffic, and motor boat traffic. Boat traffic should not be audible from the area trails under even the quietest of circumstances. The presence of Nugget Falls should not be a mitigating factor in adding noise to the soundscape. The helicopter traffic headed to National Forest lands under permit, should not be used to justify that the soundscape is already damaged and therefore additional sounds from motor boats are acceptable. The length of time motorized boat sound will be audible from various trail locations must be calculated, from initial through fading away. Consider winds as well, which carry sounds. And sounds from up high on East Glacier and West Glacier trails as sounds carry upwards.

Wakes must be presented at a maximum measured height. No wake is not possible, nor honest. Even a paddle board in motion leaves a small wake. While there are natural waves and variation on lake levels, there are no substantial boat wakes at this time. Boat wakes will be detrimental to the enjoyment of human powered vessels, and possible even to the safety. Boat wakes are also not natural and could result in harm to nesting terns and shorebirds who are already at risk from lake level changes. An extra six inch wake at high water during nesting could be the death of birds or failure of nests. How will you determine when the boats may not run? Who will make the call? How do you weigh the costs of lost operations for a private business against the value of not risking harming a tern or shorebird nest?

While commercial guided use may be authorized under a separate process, the operational plan has big impacts on the view shed, soundscape, traffic, and experience for all of us. Either anything to do with boats should be pulled from this EIS process and done separately, or there should be full details shared and analyzed and available for public comment now. It is disingenuous to disconnect the operations with the infrastructure.

I ask that you include an alternative that specifies no motorized boat traffic on the lake, and no docks.

#### Remote Glacier Visitor Area

I reference Ken Post's comments on this area as reflective of my own.

#### West Glacier Spur Trail

I object to this trail being constructed. There are times and places to leave routes undeveloped and wild. If there is to be redevelopment of this area then additional impact studies on what this will do to use and character of West Glacier trail must be prepared, including measuring the potential displacement of locals with increased use.

There is plan to add additional parking at West Glacier Trailhead. This is on top of the plan to add uplands fenced storage for the docks (which I do not support)? The cumulative impact of loss of habitat from all of this parking and the potential impacts of runoff to the lake of non-point source pollution must be considered. What is the mitigation strategy for loss of habitat here? How will increased parking impose on the trail from Skater's Cabin to West Glacier Trail? What is the operational plan for the increased bus traffic that would be associated with increased commercial use here? The cumulative impacts of existing tour traffic and increased capacity of trail plus proposed motor boat related traffic?

#### Visitor Capacity Adjustments (increases, call it what it is)

Again, this is billed as a Facility Improvement Plan. Adjustments to visitor capacity should be done in the Recreation Area Plan and not a facility plan. The EIS needs to go far above and beyond anything I have yet seen to document use and increases, including local use during the 2020 summer without cruise ships and the 2021 summer which will likely have very little cruise ship traffic. This is the time to invest in systems and plans for getting accurate community baseline use of the entire area.

How were these adjustment numbers selected? Where is the study and detailed existing use to support these numbers? Include an alternative that does not increase visitor capacity but determines the capacity that can be optimally served for quality experiences with the existing infrastructure. Building more and adding more impacts the experience for all. There are reasons for capacity limits in natural settings. I have asked for better trail studies and data for years through a number of public processes at the Mendenhall. If there are not resources to adequately study use and capacity, then there should be no plan for expanded use.

#### Adherence to Existing Plans

I did not have time to look at how this project aligns with the Tongass Forest Management Plan, nor the existing Mendenhall Glacier Recreation Plan. The project page would have been enhanced by providing ready links to those plans for the public while reviewing. I will be looking at this before / when reviewing the draft EIS.

My sympathies for whoever must do the content analysis and compile and respond to my comments. Understand that I now live within two miles of the Mendenhall and have recreated there for approaching 60 years. What is done there impacts my life, my health, and my mental health.

Regards,

Karla Hart