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Mr. Schmidt,

I am writing to object to the draft Record of Decision for the Mendenhall Glacier Recreation Visitor Facility Improvements project under 36 CFR 218 Pre-decisional Administrative Review Process. Previous comments were submitted on March 19, 2020, and May 6, 2022.

While the priority for this site should be on maintaining and protecting historic and natural integrity, it seems that those guiding the planning process were focused more on increasing and maximizing commercial use of the site and catering to the tourism industry. The level and location of much of the proposed development is incompatible with the goals of care and maintenance of the natural and scenic beauty, historic integrity, and fish, bird, and wildlife populations, and even social and cultural integrity and enjoyment of the site. By prioritizing and chasing the tourist dollar the agency is disregarding the inherent natural, historical, and manmade values that have been appreciated by locals and visitors alike for many years. The very reasons the site is an attractive tourist destination are being ignored, compromised, and overridden by a desire to bring more and more commercial tourists to the site. Early in the planning process there were suggestions for displacement studies to address displacement of local users. I didn't see if the studies were completed, and if so, whether the results were applied in the plan.

Having spent 28 years as a Forest Service Research Social Scientist I am steeped in process. I have served on IDTs, and I have done research on recreation carrying capacity, tourism development and management and adaptive management (among many other topics). In my opinion this planning process was flawed. It is my understanding that the IDT lacked a historian, an architectural historian, a social scientist, and perhaps other specialists who should have been actively engaged in this effort. I object to any changes not in keeping with the Historic Preservation Act. Adaptive management is mentioned but I didn't see how Adaptive Management would be applied and I didn't see evidence of an adequate monitoring protocol. Time and opportunities for meaningful public engagement and comment were insufficient for an adequate review. Initially, there were not enough details to comment on and in the end, it has been overwhelming, with not enough time to delve into specific changes and explore possible impacts.

As for the site, while some of the trails need to be improved and hardened to provide better, safer access for locals and visitors and better protection for natural resources including fish, birds and wildlife, widening trails to 14 feet and paving them (Lakeshore Trail) is not necessary and could lead to overcrowding, impacts on wildlife and birds and visitor experiences, and incompatible uses (e.g. e-bikes and motorized uses). With the increasing number of people walking and hiking, many being older people, and those with disabilities, bike rentals, especially e-bike rentals, are not a compatible use at this location and should not be allowed.

The trail to Nugget Falls should focus on the natural features of the site with minimal development. I'm curious if displacement and social impact assessment studies were ever completed. I didn't see any research findings to

support the recommended changes. I continue to be concerned about impacts to salmon, bears, killdeer, and Arctic Terns and their habitats throughout the site.

At the visitor center, historic integrity should be a priority and any impacts to the building and the cultural landscape should be minimized. I hope the SHPO has been involved and/or consulted during the planning process, and while I didn't see reference to consultation with landscape historians, I'm hopeful they were engaged throughout the planning process. Historic integrity is important here. Climate change is resulting in extreme changes to both the natural and manmade features important to the integrity of the site. More attention should be paid to mitigation and adaptation in response to climate change related impacts.

Commercial use should not be expanded to the west side of Mendenhall Lake and the Dredge Lakes area. These areas are and will continue to be challenged by climate change and are already facing heavy local and visitor use without introducing concentrated commercial activities. To minimize wildlife disturbance and conflicts among users no motorized vehicles or e-bikes should be allowed in these areas.

The new welcome center will block the view of what is remaining of the visible glacier. This is the view people come here to see. There is too much activity concentrated in the parking and viewing areas near the creek. The potential impacts on bears, fish and birds are significant here and in other locations where new development is being introduced.

Social, cultural and ecological impacts, natural weathering and changes associated with climate change and heavy use should be monitored on a regular schedule and mitigated as possible. Uses and visitation may need to be limited to preserve the integrity of the site and the user experience. Visitor capacity should be set and enforced, especially for heavy use areas. The entire area is a popular attraction, even a destination for some. Especially in the summer with heavy use by commercial tours, it can't be expected to serve unlimited numbers of people. Visitation may need to be restricted. An extensive monitoring plan needs to be in place to guide ongoing decisions about levels of use.

I'm not sure when the decision was made to make tourism the primary purpose of the area. Everything I have read on management of the Mendenhall Glacier Recreation Area has focused on recreation values and public use. The developments proposed here are focused on the tourism industry and further commercializing the site. As a Special Interest Area, the site deserves more consideration and protections from extensive development. Limiting commercial uses would be more compatible with this designation than the proposed expansions.

The number of commercial vehicles entering the area could be controlled and limited instead of building facilities to encourage even more use. The Forest Service does not have an obligation to have space available for every potential cruise ship passenger to visit. Developing the site for even higher occupancy will diminish the experience for all users. I question whether the recommended development is consistent with the 2016 Tongass Forest Plan. I believe it is not. The Forest Plan states, "All Special Interest Areas on the Tongass National Forest are characterized by generally unmodified environments in which unique natural features are preserved." The disregard and outright destruction of unique natural features this plan proposes are unacceptable. For example, building 2.6 miles of 14 foot wide, paved "trail" would be a huge modification with ongoing unknown impacts. This, along with other developments like the loop in the Nugget Falls Trail seem like solutions in search of a problem, or to use another analogy, like using a sledgehammer to push in a thumbtack.

Finally, as for the planning process itself, it is my understanding that James King, Director of Recreation, Lands and Minerals, was directly involved in almost every aspect of the MGRA planning process. I suspect that he personally promoted expanding commercial tourism and bike trials that could be used by commercial bike rentals and guiding companies while co-owning and marketing his e-bike guiding business. I only know about his private enterprise iRide Alaska (<https://iride-alaska.com/>) because his company applied for a lease from the City and Borough of Juneau (CBJ). I was attending the CBJ Assembly meeting to object to the lease when Mr. King

testified in support of his business's request <https://www.youtube.com/live/Bf-Q4LOBDPA?feature=share&t=2810>

As you hear in the video clip Mr. King introduced himself by listing his employment history without mentioning his current position with the Forest Service. At the time it seemed strange that he didn't mention his current job. It was only later that I discovered his deep involvement in the MGRA planning process. His request to CBJ was denied but the company iRideAlaska had already arranged pre-sales of e-bike tours online and possibly directly with the cruise ship industry. <https://alaskashoreexcursions.com/juneau/juneau-rainforest-ebike-adventure> includes photos of Mr. King, his business partner(s) and their family members. This means he and/or his business partners, in addition to their own potential gain, have been in private negotiations with companies that also could benefit financially from the changes proposed in this plan. The company is currently conducting e-bike tours in Juneau.

Having personally participated in 28 years of Forest Service ethics training I filed a FOIA Request to see if Mr. King had filed the necessary paperwork to notify the Forest Service about his outside business dealings and to ask for an assessment of a potential conflict of interest with the MGRA project. From the response I got to my FOIA request it appears that Mr. King never filed the required ethics paperwork. This seems to me to be very much like insider trading. I'm disappointed that a government employee (especially one I know personally) would use their position to personal advantage and put potential personal gain ahead of public service. This activity flies in the face of everything I know about government ethics. I will be requesting a formal OIG ethics investigation and as part of this MGRA objection I request that Mr. King be removed from any further involvement in the MGRA project until an OIG investigation is completed.