



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

1200 Sixth Avenue, Suite 155, 14-D12  
Seattle, WA 98101-3144

REGIONAL  
ADMINISTRATOR'S  
DIVISION

February 14, 2023

Monique Nelson  
U.S. Forest Service  
Juneau Ranger District  
8510 Mendenhall Loop Road  
Juneau, Alaska 99801

Dear Monique Nelson:

The U.S. Environmental Protection Agency has reviewed the U.S. Forest Service's Supplemental Draft Environmental Impact Statement for the Mendenhall Glacier Visitor Facility Improvements Project in the Tongass National Forest and the City and Borough of Juneau, Alaska (CEQ Number 20230000; EPA Project Number 20-0063-USFS). EPA has conducted its review pursuant to the National Environmental Policy Act and our review authority under Section 309 of the Clean Air Act. The CAA Section 309 role is unique to EPA and requires EPA to review and comment publicly on any proposed federal action subject to NEPA's environmental impact statement requirement.

The Mendenhall Glacier Recreation Area (MGRA) encompasses approximately 5,800 acres adjacent to the Mendenhall Glacier in Juneau, Alaska. In May 2022, EPA provided recommendations on the Draft Environmental Impact Statement for the Mendenhall Glacier Visitor Facility Improvements Project, including climate change, green infrastructure and climate resilience and adaptation. This Supplemental DEIS evaluates the potential environmental impacts of updating infrastructure and creating recreation opportunities at the MGRA that can accommodate increased future visitor use. Project activities include habitat restoration and building a new Welcome Center complex, boat docks, vehicle areas, and trails.

The SDEIS supplements the proposed project's 2022 Draft EIS by analyzing three additional action alternatives that focus on alternate locations and operational designs for the Welcome Center building and vehicle areas. EPA appreciates the Forest Service's effort in developing new alternatives based off public input.

EPA did not identify significant environmental concerns and is providing recommendations to improve the assessment and environmental outcomes of the proposed action for the Final EIS. These recommendations are provided in the enclosed Detailed Comments.

Thank you for the opportunity to review the SDEIS for this project. If you have any questions about this review, please contact Caitlin Roesler at (206) 553-6518 or [roesler.caitlin@epa.gov](mailto:roesler.caitlin@epa.gov), or me at (206) 553-1774 or at [chu.rebecca@epa.gov](mailto:chu.rebecca@epa.gov).

Sincerely,

Rebecca Chu, Chief  
Policy and Environmental Review Branch

Enclosure

**U.S. EPA Detailed Comments**  
**Mendenhall Glacier Visitor Facility Improvements Project SDEIS**  
**City and Borough of Juneau, Alaska**  
**February 2023**

**Water Quality and Aquatic Resources**

Construction and operation activities associated with the proposed project may result in adverse impacts to water quality and aquatic resources. We support habitat restoration and appreciate the coordination with Alaska Department of Environmental Conservation (e.g., developing a water quality monitoring program) to ensure the efficacy of stormwater runoff control structures. Stormwater runoff from impervious surfaces, such as parking lots, trails, and rooftops, represents a major source of water pollution carrying sediments, oil and grease, toxic substances, heavy metals, and other pollutants into adjacent waterbodies. Meltwater from the Mendenhall Glacier, heavy storm events, and annual glacier lake outbursts may increase flooding on Mendenhall Lake, which may damage infrastructure in the MGRA.

Given the environmental consequences of stormwater runoff, EPA recommends that the proposed project's FEIS incorporate green infrastructure systems where possible in the planning, design, and operations at the MGRA. The application of green infrastructure also bolsters the proposed project's resiliency and adaptation to climate change impacts associated with flooding and major storm events. In particular, EPA encourages green infrastructure elements (e.g., permeable pavers, perimeter vegetated bioswales) be integrated into the design of the new parking lots.

EPA also recommends the FEIS clarify if existing stormwater infrastructure will be updated with the new MGRA facilities, or if the existing retention pond will have capacity for additional runoff and is connected to (and therefore able to catch from) new stormwater sources. The SDEIS states that "[s]tormwater captured from the two existing MGRA Visitor Center parking lots passes through absorbent pipe socks fitted to parking lot drainage outfalls to capture sediment and other contaminants in runoff before being discharged to Steep Creek near its outlet to Mendenhall Lake."<sup>1</sup>

Proposed activities in Alternatives 5 and 7 have the potential to cause water quality impacts associated with additional traffic and stormwater runoff. We recommend that the two bullets below, that are found in the other alternatives, be added to Alternatives 5 and 7 on SDEIS Table 2-8 (Watersheds, Wetlands, and Aquatic Habitat; Water Quality section).<sup>2</sup> Clarify in the FEIS if this addition would change the "Minor Effect" determination.

- "Stormwater management would limit water quality impacts from parking area."
- "Additional traffic could contribute to adverse water quality conditions."

EPA recommends the FEIS include a bathymetric map for the Mendenhall Lake to illustrate lake bottom profile and elevations. This information would be useful for determining whether the proposed motorized commercial boats are able to navigate the lake at current depths and whether there would be a need for future navigational dredging. When describing the direct and indirect effects common to all action alternatives, the SDEIS states that "[t]emporary impacts to [essential fish habitat] and fish from pile driving and dredging or discharging of fill in aquatic environments are likely but would be minimized through use of stream diversions and timing windows, as appropriate."<sup>3</sup> However, on SDEIS

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<sup>1</sup> SDEIS, p. 3-117

<sup>2</sup> SDEIS, p. 2-101

<sup>3</sup> SDEIS, p. 3-125.

Table 2-8 only Alternatives 2 and 3 consider the impacts of dredging. We recommend that the bullet considering dredging impacts be added to Alternatives 4 through 7. Clarify in the FEIS if this addition would change the “Minor Effect” determination for Alternatives 5, 6, and 7 and the “Negligible Effect” determination for Alternative 4.

### **Air Quality**

EPA appreciates the Forest Service considering the use of electric vehicles and methods of reducing vehicle idling in the additional alternatives included in the SDEIS. We note that utilizing electric shuttles at the MGRA also benefits water quality by minimizing fluids that may spill from combustion engine vehicles. Overall, we encourage maximizing the use of electric vehicles and minimizing vehicle idling near dense visitor areas to lessen air quality impacts.

We recommend that the FEIS clarify which alternatives propose the use of electric shuttles and be edited for consistency throughout the document. For instance, Table 2-8 (Air Quality; Local Air Quality section)<sup>4</sup> does not include impacts from diesel shuttles for Alternative 5, but electric shuttles are not listed earlier in the table’s recreation section.<sup>5</sup> Clarify in the FEIS if this addition would change the “Minor Effect” determination for Alternative 5. Similarly for Alternative 7, Tables 2-1 (Parking and Access Expansion)<sup>6</sup> and 2-8 (Recreation)<sup>7</sup> mention electric shuttles, but in Section 3.11.6.2 the analysis appears to assume diesel fuel.<sup>8</sup>

According to the SDEIS, the limited waiting space for buses in Alternative 7 has the potential to result in a major impact to traffic. The SDEIS, with regard to Alternative 7, states that “[s]eparation of private parking and bus parking and the addition of new parking areas for private vehicles in other areas of the MGRA would also contribute to reducing the number of idling vehicles and traffic delays similar to Alternative 6.”<sup>9</sup> EPA recommends the SDEIS indicate if the increased traffic would make it difficult for visitors to access the private parking area, even with the benefit to locals of separated private parking. We support this alternative’s effort to improve the visitor experience for locals, who would be more likely to use personal vehicles rather than commercial vehicles.

### **Climate Change**

The SDEIS states that “[c]onditions in Suicide Basin and Mendenhall Lake stage are monitored by the [U.S. Geological Survey] and the National Weather Service to provide early warning for glacial lake outburst floods.”<sup>10</sup> EPA recommends that the FEIS explain how the proposed project will apply the early warning to alert employees and visitors at the MGRA. Establishing and implementing an early warning system for floods would help issue timely evacuation warnings and notify visitors of pending flooding at the MGRA. We further recommend establishing and implementing an emergency response plan to address major flooding incidents associated with glacial lake outburst (e.g., identifying the appropriate elevations in the MGRA). The SDEIS states that “[s]ince 2011, the MGRA and surrounding areas have experienced regular, periodic flooding due to glacial lake outbursts...[b]y chance, glacial

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<sup>4</sup> SDEIS, p. 2-103.

<sup>5</sup> SDEIS, p. 2-99.

<sup>6</sup> SDEIS, p. 2-4.

<sup>7</sup> SDEIS, p. 2-99.

<sup>8</sup> SDEIS, p. 3-188

<sup>9</sup> SDEIS, p. 3-165.

<sup>10</sup> SDEIS, p. 3-120.

lake outburst flood events have not yet coincided with a heavy rain event, suggesting that larger flows are possible in the near future.”<sup>11</sup>

### **Wildlife**

EPA recommends the FEIS clarify if the 820-foot no-disturbance buffer for seabird colonies is a no-wake buffer or a no-boating buffer. Also clarify if the buffer would apply to both motorized and non-motorized boats. The SDEIS states that, to the extent feasible, “motorized boats would maintain an 820-foot (250-meter) no-disturbance buffer from seabird colonies, as directed by Forest Plan guidelines (see Chapter 2, Section 2.4.2; USDA Forest Service 2016, p. 4-89)...implementation of mitigation measures, including no-wake speeds within 820 feet of the colony and onshore closure signage to keep foot visitors away, would meet the purpose of Forest Plan guidelines for regulating human use and minimizing disturbance (USDA Forest Service 2016, p. 4-89 Section XI.A.1.b, p. 4-90 Section XII.A.3 and A.6).”<sup>12</sup>

### **Noise**

Proposed commercial motorized boat operations in Alternatives 2, 3, 5, and 7 have the potential to cause noise impacts. We recommend that noise from electric boat engines be included in the FEIS’s Table 2-8 (Recreation, Operational Noise section) for Alternative 7. Clarify in the FEIS if this addition will change the “Negligible Effect” determination. If effects are more than negligible, include measures to take to minimize impacts.

### **Tourism**

EPA recommends that the FEIS include outcomes of the memorandum of agreement, if finalized, between the City and Borough of Juneau (CBJ) and Cruise Lines International Association (CLIA). Explain how the outcomes of this MOU could impact this project and related analyses (e.g., climate change and greenhouse gas emissions; air and water quality). The SDEIS states that resources could be impacted by increased cruise ship tourists in Juneau, and that “proposed projects could affect scale of growth in cruise ship visitation in Juneau differently. CBJ is in the process of implementing a memorandum of agreement with CLIA to limit the number of cruise ships in Juneau to five per day which would be agreed upon on an annual basis and could limit visitation.”<sup>13</sup>

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<sup>11</sup> SDEIS, p. 3-172.

<sup>12</sup> SDEIS, p. 3-37.

<sup>13</sup> SDEIS, p. 3-51.