

April 04, 2022

To: USFS, Juneau, Alaska

From: Juneau Nordic Ski Club (JNSC)

Re: Comments on the MGRA DEIS Visitor Facility Improvements Project.

The Juneau Nordic Ski Club (JNSC) would like to thank the USFS for this opportunity to comment on the MGRA DEIS. The JNSC is a 501 c3 organization that serves the nordic cross-country skiing community in the Juneau, Alaska area. Our response specifically addresses those sections in the DEIS that explicitly or implicitly relate to nordic skiing and nordic ski trail development; we limit our comments and suggestions to those aspects. JNSC is not taking a position on tourist expansion at the MGRA.

In general, the DEIS' embrace of nordic ski trail development is a very positive step! It's heartening to have the USFS supporting and advocating for non-motorized winter sports activities in the MGRA Master Plan. Trails built to nordic ski standards will also increase access for hikers, bikers and other users year-around.

To fully maximize those opportunities the JNSC suggests that USFS employ a professional nordic ski trail architect to help with the design of the various trails that are intended for nordic skiing and other non-motorized winter use. Additionally, we ask that the USFS also work with the JNSC regarding trail location, layout and construction that will accommodate grooming equipment with a minimum width in the 14' range (Appendix A). Capacity for multi-season, multi-sport users is important to consider up front. From decades of grooming experience, the JNSC knows that groomed winter trails developed a larger user base than just nordic skiers.

Specific Comments:

1. Alternatives 2 and 3 are quite similar in addressing nordic ski trail development, including the construction of new nordic ski trails and rehabilitation of current trails. JNSC suggests that Alternatives 1 and 4 could also include these same design elements.
2. JNSC fully supports any version of the 14' wide Lakeshore Trail (LST), with a slight preference for the inland setting described in Alternative 3.
3. It is unclear as to where the trailhead for the LST will be located at the "Welcome" center in either Alternatives 2, 3, or 4. The March 15th presentation indicated that the trail would end at the commercial parking lot but maps in the DEIS do not show this lot, nor the trail to it. A design concern is creating enough room to turn grooming equipment around. How would skiers access the trail from the new "Welcome" center?

4. We are appreciative that the new “Welcome” facility will be open during the winter. It will be a great place for skiers to congregate, warmup, and start their ski journeys! And also, that it will be available for rental during the winter months.
5. JNSC fully endorses the 14’ wide bridge over the river, connecting the LST to the Campground and suggests that it be added to Alternative 4 as well.
6. The Campground continuation of LST is slated to be 8’ wide. If expanded to 10 - 14 ft width it will allow nordic grooming.
7. Parking lot within the Mendenhall Campground at the current hiker/biker campsites: we question the wisdom of siting a 30-car parking lot at the current walk-in campsite. This will greatly increase motorized traffic throughout the campground during the summer. The current DEIS needs to state that there would be no motorized winter access to the lot.
8. JNSC suggests instead to expand the current parking lot across from the Skater’s Cabin. This option would address the current parking capacity issue, increase winter-time parking for skiers and hikers, and allow easy access to either the LST or the proposed West Glacier Loop Trail. If you must build a small parking lot closer to the new bridge, please make it suitable for only a few cars.
9. Dredge Lakes Outer Loop: on pg. 2-55, the DEIS specifically excludes a nordic ski loop. Historically the JNSC groomed in this area for nordic skiing. Is it possible to design a trail for nordic skiers, nominally for setting a classic track for diagonal striding when conditions permit? (Classic technique uses a narrower trail). This would be a great addition to the MGRA nordic ski trail system. The Moose Lake Connector trail is designated to be 12 ft wide, which is a groomable width. Details on trail length and width for the proposed Glacier Spur Connector should be outlined and mentioned to assist in further comments.
10. The inclusion of the West Glacier Loop (WGL) trails (originally proposed by the JNSC) is deeply appreciated. This trail system is seen as an integral part of a connected valley trail system and could very well become the gem in the MGRA nordic trail system. The JNSC would be pleased to assist the USFS in developing a more detailed description. See Appendix A for more details on constructing nordic ski trails
11. The current standard for the width of nordic trails is 14 feet or more (Appendix A), and JNSC advises that the WGL trails be built to this width and also have adequate tree canopy clearance to allow for best winter snow accumulation.
12. JNSC would like to recommend a 14’ skate-width trail as an outer loop (Fig. 2-12, p. 2-43), beginning with the Tolch Rock Trail across the street from the campground gate, and proceeding clockwise to link up with the West Glacier High Loop. This would be a little

over a kilometer of additional 14' width trail (the return would be on the Aak' wSit' Trail), and would complete an excellent loop.

13. We are unclear on the USFS intentions for the 'social' or user-built bike trails; the DEIS says some will become 'sanctioned' and will be upgraded to USFS standards. How would one or any of these trails be integrated into the WGL nordic ski trail system? We mention this as the USFS lands are managed for multipurpose, could that apply to the development of trails for all non-motorized trail users?
14. Cabins and day-use warmup shelters: we are concerned about the 5 proposed cabins in the Mendenhall Campground. They will add a lot of walkers to the groomed winter ski trail as experienced at Eagle River State Park. At a minimum JNSC requests dropping the most southerly of the cabins (located in the bigger auxiliary loop) and that the addition of a separate "walking trail" be created to the cabins along the lakeshore from Skaters cabin. Another option is to disperse cabins across the west valley area along the current road running from the Campground parallel to the lakeshore. The cabins would be easily accessible with short driveways into them or short walks that would improve the effect of 'glamping' and improve the user experience by dispersing the cabins and it would preserve the hiker/biker campsites in the campground.
15. JNSC suggests that the cabin proposed to be sited near the entrance of the Campground (near where grooming equipment is stored) instead be a day-use lodge and warming hut. If all of the proposed trails come to fruition, it will be a great place for skiers to congregate, ski for a couple hours, rest and eat lunch, and then return to the ski trails.
16. We would like to ask that a warming hut on one of the glacier proximal platforms be available through the winter, perhaps maintained by JNSC? It's easy to imagine skiing right up to it via a groomed path across the lake and up the new trail, bringing us near the glacier edge. The glacier face currently prevents us from grooming this way, but probably not for long.
17. JNSC suggests the addition of electric vehicle charging stations. The JNSC is on a list to purchase an electric snow machine for grooming purposes. Creating the charging station ahead of time for the snow machine and electric cars is important to goals of sustainability.

The JNSC, and our nearly 1000 members, are very grateful to the USFS for our mutual decades-long partnership on the MGRA. Together we have provided tens of thousands of winter user days of recreation to Juneau residents and visitors. We are eager to cooperate with the USFS in developing these new trails. The expanded trail system will accommodate the growing numbers of year-around users of the MGRA for the decades to come and is integral to establishing a connected trail system between the MGRA, the Montana Creek trails and Spaulding Meadows (<https://jnski.org/wp-content/uploads/2022/01/JNSC-Nordic-Trail-Development-Plan-Jan-09-2022.pdf>).

Appendix A

For general layout and construction specifications of cross-country ski trails, and more specifically the WGL Trail, an example of guidance for cross-country ski trail construction comes from Northern Arizona University, which cites the manual, "Recreational Trail Design and Construction," developed by the Minnesota Extension Service of the University of Minnesota. It emphasizes the following aspects of recreational cross-country trail layout and construction:

1. Trail layout and length – The trail system should comprise loops with internal connectors and cutoffs that allow the skier discretion in how long to ski. Loop lengths should range from 5 to 15 km with a beginner's loop of about 1 km. Minimum clearing widths should range between 3 and 5 meters, depending on what type of skiing is accommodated and whether a steep section would require herringbone technique uphill or turns downhill. Grades should usually be less than 5% rise over run for general skiing with occasional sustained pitches of 10% and short (less-than-50-m) pitches of up to 25%.
2. Trail construction – Trails should be smooth enough and free from protrusions to accommodate grooming when snow depth reaches 0.3 m. Trails should have gentle curves, especially avoiding sharp turns at the bottom of downhill. Bridges should accommodate the width and weight of grooming and maintenance equipment.
3. Other considerations – Cross-country ski trails are considered compatible with winter snowshoeing and summer hiking and bicycling. They are considered to be incompatible with snowmobiling and wheeled traffic. Cross-country skiing venues should have adequate parking areas, rest areas for skiers, shelters every 15 to 20 km, and appropriate signage.

Thank you on behalf of the Juneau Nordic Ski Club.

Frankie Pillifant, President

Roman Motyka, trails subcommittee chair