

Comments On The Proposed Mendenhall Glacier Visitor Facility Improvements Supplemental EIS

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My previous comments submitted in April for the Draft EIS are still valid and are incorporated with these comments by reference. I encourage reviewers to read those comments again as they form a basis and some improvements have not been made for this document.

First, I was pleased to see that the Team developed alternatives that attempted to respond to the issues that have been raised in my previous comments and by others as well. The sheer volume of items proposed in each alternative makes it very difficult to synthesize the total effects of the actions and trying to access this information electronically is beyond a challenge for any reviewer.

We have to go back to the original purpose and need for the project actions combined with the stated objectives to provide quality opportunities within the natural setting and spectacular scenery and protecting this experience while attempting to meet the increased demand of the visitor industry. This is extremely difficult without developing a carrying capacity for visitors that coincides with the above objectives. Normally this is tackled during the initial planning stages of a project so that the side boards are set with alternatives responding within their confines. The carrying capacity issues were well known to us during our 1990s project planning and we knew this would need to be confronted in future planning. However, the current Team has failed to confront this issue and set allowable standards of visitation to the site(s) that would meet the stated objectives for the project. Merely setting numbers with visitation data does not set a carrying capacity that represents a reasonably quality experience.

The Historic Architecture Report does a thorough job of capturing the architectural elements embodied within the original structure that remain to contribute to its significance as it relates to historic integrity. It only skirts the issues faced by the designers in the 1990s tasked with providing visitors with interpretive opportunities, adequate accessibility, more shelter, and the opportunity to purchase interpretive materials which the original Visitor Center was completely lacking. It also misses what wasn't done. The Visitor Center still maintained the element of discovery since all the improvements were developed away from the arrival area. The glacier still was the main focus upon arrival. Faced with accessibility issues, the tunnel and elevators provided access without disturbing the site or views. An exterior funicular was decided against due to its impact on the site and significance of the original design. The Report also misses the fact that the Covered Viewing Structure was sited to the west and was lowered in the slope to not obstruct the dominant view. The sewage pump station and grinding pumps were placed underground and out of sight. The bridge at Photo Point Trail was originally a linear structure on an organic landscape and was replaced by a curvilinear structure nestled into the rock outcroppings. The new trail to the overlook hugged the outer landscape to the east so that it was subordinate within views from the Visitor Center. These are all elements

that make up a design theme that was carried throughout the cultural landscape of the complex as a whole. A cultural landscape architect would have documented this within the Report if employed on the Team. The documentation on this project is missing the thoughtful progression of design over the years that continued to support a quality visitor experience while providing needed improvements. If you don't get it now, it will be lost forever and the reports thus far are just repeating information that we had already documented in the 1990s.

- No mention of the American Society of Landscape Architects Gold Medallion Award given to the work done in 2000.
- No mention of the National Association of Interpreters Interior Exhibits First Place Award given in 2000.
- The Chief of the Forest Service dedicated the expanded project in 1999.
- A Landscape Architect and not an Architect headed up the 1990s project for 9 years making improvements that continued with the original design theme.

Alternative 6 offers an option that keeps with the original intent of the site design and subsequent improvements over the years. The portrayal of the design, as mentioned by others during your Zoom review, has not been developed to fully display the building architecture and how it can blend in with the surrounding rocky knoll. It's at a disadvantage compared to the Alternative 2 or 4 marketing. It was mentioned during the Zoom that the decisionmaker would have enough information to make a with decision with these graphics. Unfortunately, I've never seen a design professional in those decisionmaker's shoes and their hunches aren't always comprehensive.

Here are the concerns I have with this document and its analysis:

- There are no issues statements that reflect the scenic and visitor experience in regards to location of the Welcome Center, docks, and other built improvements. Please see previous comments.
- Alternatives 5, 6, and 7 all have the same Lakeshore Trail proposal and many commenters have opposed this amount of development along the shore. Also a 12 foot wide trail is out of scale and is a road, not a trail. An 8 foot wide trail would be in scale. As an example, Grand Canyon National Park has a series of Rim trails and they are 8 feet wide and visitation there is over 4.5 million visitors per year. There needs to be an option to reduce this impact near the shore.
- The Nugget Trail is in plain view from the Visitor Center and Photo Point Trail. I agree with a developed trail but it would be less impacting to not have a loop trail. The decisionmaker needs an option to reduce this impact.
- The fish viewing platforms on Steep Creek should be kept to no more than 4 in the area. The proposed 8 to 11 would add a huge impact of the built environment and distract from the natural habitat. At the maximum this would be 7700 sq. feet of platforms which is excessive and a negative impact to the natural environment.
- You have received many comments against the floating docks and motorized boats launching from the shoreline near the Visitor Center. This is a huge negative impact on the scenic integrity as well as the visitor experience. It should not be included in a selected alternative. Limit boat tours to launches from the west end of the lake so that distance reduces their impact as viewed and heard from the Visitor Center Unit.
- My previous comments are still accurate regarding the impacts on scenic integrity and visitor experience with Alternative 2, 3, 4, and 5. They all contribute a major negative impact to these elements and would degrade the experience and detour from the

design ethic/criteria that has been used for the past sixty-two years. They would be transforming the cultural landscape into a major urban built environment. Alternative 4 is showing a “moderate” impact on scenic resources and this is not correct. It should be a “major” impact due to the location of the Welcome Center and Kettle Pond bridge.

- The impact analysis does not have a “recreation visitor experience” analyzed for each alternative. This is crucial for attempting to meet a stated objective. However the entire document fails to state an objective regarding this. The Forest Plan and objectives for recreation use in the MGRA state it in specific terms.
- Expanding the Visitor Center Unit in Alternatives 2,3,5,&7 is also expanding development in these new areas which negatively impacts the scenic integrity and the visitor experience. I do not support this due to its impacts on the natural environment. Alternative 6 has expansion of the Visitor Center Unit along the shoreline to the west and this is too much as well. The Visitor Center Unit portrayed in Alternative 4 should be mimicked in Alternative 6 to go along with its overall theme of being subordinate to the natural setting.
- Alternatives 6 and 7 have a Kettle Pond Overlook that has not been previously in the alternatives. If kept back to the edge of the pond and cantilevered a bit over it, with a curved outer edge instead of an angled one it could be a good replacement for the curved bridge and showcase the pond as a glacial remnant feature. If designed carefully, it could be keeping with the cultural landscape design features. The protective guardrail should be transparent and not made as a solid structure.
- Although a significant amount of description has been added to cover the rock excavation and blasting that will need to be done for Alternative 6, it should not be construed as a potential negative impact on the original Visitor Center. Blasting occurred during the construction of the tunnel/elevator system without consequences.

Interdisciplinary Team and Steering Committee

- There are no design professionals on your team to cover landscape architecture, visual analysis, cultural landscapes, architecture, and historic structures. I’ve mentioned this before.
- The Steering Committee is comprised of Directors from the Regional Office that are also on your IDT. They have been very active in this process of developing the projects and alternatives and have participated in public meetings and Zoom presentations. This is welcomed to use their expertise and it also creates a higher level of influence over the entire project. Unfortunately this creates a problem with objectivity if there are “objections” after a decision is reached. They would be supervising their respective staffs during responses to objections and this is a significant problem. It appears that a group from another Region will have to be brought in to handle this work.
- Mr King, Director of Recreation, etc., stated during a Zoom meeting that the designs would be reviewed by the public and that there would be public participation in later stages. Normally this does not occur once a decision is made except to “share” the design with the community. I look forward to being involved during the design stage as promised by the Director.
- The document states that an Interpretive Plan will be developed to go along with building improvements. This once again highlights the lack of a design professional overseeing this project who would know that an interpretive plan is the first item that is completed that drives and informs the subsequent building design.

As previously mentioned my comments submitted during the two other reviews still stand and are part of this record so they are not repeated here.

I am available to discuss my comments and concerns with team members and the decision maker at any time.

Michael Terzich

