

Regional Forester David E. Schmid
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June 26, 2023

Dear Mr. Schmid,

This letter represents my formal objection to the draft Record of Decision for the Mendenhall Glacier Recreation Visitor Facility Improvements project under the 36 CFR 218 Pre-decisional Administrative Review Process.

I provided written comments in response to scoping on 1/13/20, on the DEIS on 4/26/22, and on the SDEIS on 2/13/23 which gives me standing to object to the project. I have five formal objections described and listed below in response to your draft Record of Decision.

Objection 1

I object to the sited location of the Welcome Center and Kettle Pond Bridge as described in Alternative 5 due to the major impacts on scenic integrity and the scenic resources and the subsequent visitor experience. I have previously commented on these impacts in each one of my responses to your documents as listed above and my objection is based on those written comments.

The siting of these facilities is inconsistent and violates the Forest Plan Direction (2016). It states that the goal of Special Interest Areas is to:

To provide for the inventory, maintenance, interpretation, and protection of the existing characteristics and attributes of areas with unique cultural, geological, botanical, zoological, recreational, scenic, or other special features.

With an additional goal to:

Provide Forest visitors with visually appealing scenery, with emphasis on...popular recreation places.

The goals are further supported by objectives to:

Provide opportunities for public study, use, and enjoyment of unique natural areas that are suitable to, and do not compromise, the characteristics of each area.

Allow only facilities and recreation developments that contribute to the interpretation of natural features or provide for compatible public uses, and that blend with the natural setting

And the Desired Conditions state:

Scenic areas are comprised of landscapes of outstanding beauty or natural characteristics, such as glaciers, alpine, and areas of diverse vegetative patterns/coverage. These are areas that could be viewed for a long duration from specific vantage points, such as developed recreation sites, trails, anchorages, travel routes, and communities.

The Record of Decision does not protect the existing characteristics and attributes of the area's unique recreational and scenic features. In fact it imposes a major impact on these resources as represented in the EIS. It disrupts the visually appealing scenery with a 16,000 square foot building and a bridge situated directly in the primary viewing experience of the glacier and lake. The Record of Decision imposes facilities into the scene that do not blend with the natural setting and instead violate another goal of the Forest Plan Direction. The desired condition within the Forest is to provide scenic areas comprised of landscapes of outstanding beauty or natural characteristic such as glaciers and the underlying intent is to have facilities subordinate within the scenic area.

I object to the implementation of Alternative 5 since it does not follow the goals, objectives, and desired conditions as described in the Forest Plan that is the overall guiding documents for management on the Tongass National Forest. Similarly it is not consistent with the MGRA Master Plan (2019) a guiding document that informed the public that management of the area would:

- *provide sustainable recreation experiences that interpret glacial features in a changing environment*
- *view the scenery...and provide the best facilities to protect these opportunities in the future*
- *Peoples interaction with nature are enhanced without negatively impacting the natural resources of the area*

This document also illustrated in graphics how a new Welcome Center would be built nestled in the rock outcropping to the east of the parking area, tangential to the viewing of the glacier, and consistent with past design criteria and development that had facilities subordinate in the landscape. This was a commitment to the public that future development would be sensitive to the scenic values and natural environment. The Record of Decision violates that commitment and has not followed past planning efforts in the Forest Plan and the Master Plan for the area.

Resolution for Objection 1

Select Alternative 6 and rewrite the Record of Decision. Alternative 5 is completely slanted toward an architectural solution with an increased tourism emphasis that creates a major irreversible impact on the scenic integrity of the site and a diminished visitor experience. It also invalidates the guiding direction in the Forest Plan as well as the MGRA Master Plan.

Objection 2

I object to the lack of representation on the Interdisciplinary Team associated with this project in regards to landscape architecture, cultural landscape architecture, and historical architecture. With such an important project, the team can not rely on outside contractors to represent the “public good” when the agency is paying the bills. Advocacy needs to come from professionals within the agencies entrusted with public lands and their values. Scenic integrity and the cultural landscape has been completely neglected during this entire process and it appears that the qualified professionals have not been employed. I have mentioned this within my previous responses to the plans and documents and have standing on this subject.

Response comments regarding my comments have been inadequate and “archaeologists” have been mentioned as having reviewed the resources. However archaeologists aren’t trained in cultural landscape architecture or in reviewing overall comprehensive site design relating to the history of development regarding the site.

Once this trend developed a solution, Alternative 5, it was very difficult to retrace the thought process without these professional advocates and so the decisionmaker had a solution without proper professional expertise within his staff.

An adequate and comprehensive team is required by the National Environmental Policy Act and the National Historic Preservation Act. The Forest Plan (2016) direction requires professional representation of every expertise to implement every portion of the plan.

Resolution for Objection 2

The Forest Service needs to consult with public employees within land management agencies that have landscape architecture (trained in visual analysis and scenic integrity), cultural landscape architecture, and historical architecture expertise to review the project documents, the associated comments, and the entire public record. After their review they would meet with the decisionmaker and staff to share their findings, recommendations, and positions on the Record of Decision so that they can be the advocates for those resources that have been lacking in representation. At that point the decisionmaker would consider this information and make a truly informed decision.

Objection 3

I have an objection to the Forest Service’s process that leaves an evaluation of the cultural landscape and descriptions of past events that contribute to the sites’ significance out of the synthesis involved in making a decision on which alternative to implement. As previous mentioned in my comments, the Visitor Center Unit has had a host of changes and improvements that have contributed to the development of a cultural landscape within the unit

and is not only centered on the historic significance of the Visitor Center. Without this evaluation of the cultural landscape, the decisionmaker is missing a vast amount of history, implemented design criteria, intent of added improvements that have been consistent with the core visitor experience, and the individuals that made this all happen. These have been mentioned in my comments and have not been included in any of the documentation within the affected environment. The American Society of Landscape Architects, National Association of Interpreters, and an engineering society have all recognized the past designs and improvements that make up the Visitor Center Unit as it stands today. This all contributes to an evolving cultural landscape, whether confined in enough years to make it "significant", but over time could be vastly important if negative impacts on the landscape could be avoided by proper decisionmaking.

Leaving this analysis up to the process defined in the Programmatic Agreement with the State Historic Preservation Office, after the decision has been made on any alternative is not proper planning and violates the basic tenet of the planning process.

Resolution of Objection 3

The Forest Service should conduct a thorough analysis of the cultural landscape within the Visitor Center Unit by a highly qualified cultural landscape architect working for a public lands management agency and not a private consultant. A professor from a university that covers this expertise in its curriculum could be used with the proper academic background and experience. The analysis would then be presented in person to the decisionmaker and staff and the range of alternative would be discussed and evaluated by the expert.

Objection 4

In light of the new information that has come out since the Record of Decision was completed, I am filling this objection. My objection is not based on previous comments made during the process but instead what has surfaced recently. A FOIA request by a colleague and its subsequent response from the Forest Service divulged that Mr. James King did not disclose (USDA/Forest Service guidelines and manual direction) that he has an interest in a commercial outdoor company related to tourism. As a former employee of three federal agencies I know that I had to have up to date disclosures on my financial holdings, affiliations, and any outside work in which I was involved. I appears that Mr King either did not follow this requirement, did not thoroughly divulge his interests, or the Forest Service did not follow through with disclosure requirements for this employee. He also testified at a Juneau Assembly Meeting this year in which he represented himself as a co-owner of an E-bike company without sharing that his present position was with the Forest Service as the Director of Recreation, Lands, and Minerals while stating other positions he has occupied before working for the Forest Service. Nevertheless, Mr King has been a prime steering committee member, spearheading the process and design work, and has met with a number of outside individuals personally to represent the project. His interest in this outside tourism company is not just an "appearance of a conflict of interest" but is a direct conflict of interest. I object to this situation and the position that Mr. King holds while having this conflict of interest. It sheds a very suspect concern on the entire

planning process and the subsequent decision to implement Alternative 5, which clearly favors tourism over preservation of the qualities of the Special Interest Area (Visitor Center Unit). Mr. King also supervises an entire staff that has been involved in the process and yields a huge influence on the outcome of this project.

Resolution of Objection 4

In light of this information the Forest Service should first remove Mr. King from further involvement in this project and also be removed from supervising any staff that will be involved in reviewing objections or providing additional support to the decisionmaker. The Forest Service should also conduct an independent review of Mr. King's involvement in the project from the very beginning of the concept development, his influence during meetings on the subject, and the positions he advocated during his involvement.

It is suspect to know that only one proposed action was offered to the public during scoping and it overwhelmingly favored tourism development over protection of the Special Area attributes. Previously before his involvement, the MGRA Master Plan offered a Welcome Center that was subordinated to the scenic integrity, glacial features, and a quality recreation experience. However, the subsequent Alternative 5, is just the opposite. No other planning process in the history of MGVC (undocumented as in a previous objection) has ignored the dominant attributes of the Special Interest Area and has instead focused on tourism. Conflict of interest is a powerful force and can degrade the Forest Service's ability to protect this valuable resource.

The Forest Service, after conducting this internal investigation should reconsidered their Draft Record of Decision and especially reconsider Alternative 6 that provides a solution to the major negative impacts associated with Alternative 5 while meeting the increased capacity needs for facilities that support increased visitation. It is hoped that through this process the Forest Service can be trusted to form a clear objective response to the conflict of interest that has pervaded within the planning process and return to the very essence of why MGRA was set aside as a Special Interest Area many years ago.

Objection 5

As previously stated in my comments to your documents, three Directors (Recreation, Planning, and Engineering) from the Regional Office have had direct involvement in this project as well as their staffs. This has not been a solely run project at the Supervisors Office level. Although the draft Record of Decision states that the objection review would be covered by still another Director in the Regional Office, this director doesn't have the subject matter expertise to conduct this review and would need to use staff from those Directors mentioned above. I object to the objection review process being conducted by Region 10 staff since there is an obvious problem as described in Objection 4 as well as a bias position within the three director staffs. There is no trusted way that the Region 10 office could conduct this review in an objective manor.

Resolution of Objection 5

Send the entire objection review process to another Region or to the Washington Office so that we have a completely new staff reviewing the process and facts regarding this project and the Record of Decision. This is the only way to give any appearance of credibility in handling the objection process.

In closing, I worked in Region 10 for twelve years and completed \$17 million worth of projects and much more than that over fourteen year at Grand Canyon National Park that enhanced visitor's use of public lands without causing major negative irreversible impacts. Many of us have spent days trying to provide meaningful and helpful comments regarding this project and although some have altered the course the key issue of the Welcome Center location and the Kettle Pond Bridge remains a blight on the Mendenhall Glacier Recreation Area.

Sincerely,



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