



## FRIENDS OF KENNICOTT, INC.

Box 241362, Anchorage, Alaska 99524

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Bruce Rogers, Planner  
Wrangell-St. Elias National Park and Preserve  
P.O. Box 439  
Copper Center, Alaska 99573

Dear Bruce:

This letter constitutes Friends of Kennicott's comments on the June 2011 Proposed Action for the revised Kennecott Operations Plan, including recommendations for content in the Environmental Assessment (EA).

Friends of Kennicott applauds the current planning process, including the extra public involvement steps, facilitating informal individual and small-group dialogue, and addressing Kennecott issues before initiating the Frontcountry Plan. Like the National Park Service (NPS), we recognize the unfortunate breakdown in communication in the last few years on the Interim Operations Plan, due largely to staff turnover, which hurt the community's trust in the Kennecott decision processes. We appreciate the efforts of you and other park staff to turn this around and draw many skeptics back to the table.

Friends of Kennicott generally supports the consolidated comments prepared by the McCarthy Area Council Kennecott Committee. Most of Friends' comments in this letter supplement or expand on the MAC comments.

The most significant addition needed in the upcoming EA is the recent historical context of this planning effort, which:

- builds on a history of discussion and agreement among multiple stakeholders (embedded in documents dating from prior to NPS acquisition to the present), defining a management direction and vision;
- reflects Kennecott's multiple roles as a historic site, a natural area accessible to visitors, the main visitor destination in the nation's largest national park, and part of an ongoing human community; and
- rests on a policy foundation of the area's multiple designations as National Preserve, National Historic Landmark and World Heritage Site.

Friends of Kennicott is uniquely qualified to share important background about this needed context, including the reasons for and assumptions associated with the NPS acquisition of Kennecott. We were involved from the very beginning in brainstorming Kennecott's future with

numerous and diverse stakeholders; we secured the early emergency stabilization funds that allowed key buildings to remain standing pending eventual NPS acquisition; and we launched the first successful pilot partnership project with the NPS to restore the Recreation Hall and make it available for community use.

Our comments also emphasize:

- the importance of retaining the “light touch” approach,
- reviving and solidifying the NPS commitment to on-going and tiered local community involvement in decisions that involve or affect Kennecott,
- integrating the interpretive theme of “change,”
- engaging with adjacent private landowners in Kennecott in a way that is mutually supportive, and
- expanding opportunities for partnerships.

Throughout this summer’s community discussions about the Kennecott Operations Plan, the relative lack of controversy regarding the proposed treatment goals for most of the individual structures at Kennecott was notable. We concur that most of the building treatments outlined in the Proposed Action appear reasonable and justifiable. However, these proposals remain at an outlined, conceptual level; and the devil is in the details. The key to success will be identifying and following through with the appropriate decision junctures and to involve stakeholders in development of these critical details, none of which seem to be too small. The importance of working with the community and other stakeholders on implementation details *before* such decisions have been made is one of the most important commitments needed in the Plan.

This commitment needs to extend beyond the architectural details and include the full range of future decisions that tier off the Operations Plan. We recommend the Plan identify guidelines, goals and processes for resolving issues that require detailed attention after the present planning process is completed, including continuing community discussions and formation of multi-stakeholder working groups on specific issues. (See additional comments about Implementation.)

### **Planning Context**

The history of park planning for Kennecott is reflected in a series of documents that embody discussions over a more than twenty year period, the essence of which continually boiled down to the “light touch” approach, along with recognition of the significance of multiple site values and time periods, community involvement and partnerships. The present plan should clearly state that it builds from this foundation.

Support for public acquisition of Kennecott gained momentum following the 1986 Landmark designation. In 1990, Friends of Kennicott sprung from a broad coalition of stakeholders, including historians, miners, conservationists, the state, the NPS, and local residents and business owners, among others – all rallied around a shared vision for Kennecott’s future. This shared vision included preservation of 1) the unique historic values of Kennecott without artificial reconstructions, 2) the spectacular wilderness setting, and 3) the integrated, living communities within and surrounding the mill town.

Attempts over the years (decades) to articulate Kennecott's unique qualities and management objectives have remained remarkably consistent, as illustrated by the excerpts below from various Kennecott planning reports and studies, most of which are available in their entirety at <http://www.friendsofkennicott.org/documents.html>:

1990 – Keeping Special Places Special, Joseph Sax: “[T]he opportunity that exists today to see and experience a very special place could easily be lost. Fortunately national, state and local, private and public, interests are in harmony. There could not be a better occasion for a joining of hands in cooperative effort.... The call here is for the light touch – low key and modest budget.” (pages i-ii)

“[W]hat remains is mesmerizing. No one has fancied the place up.... The chaotic and tumbledown quality of the place is its appeal. In no organized and ‘interpreted’ place is the sense of personal discovery, of private engagement with a past moment, so real.” (page 3) “Here in a single place three intertwined eras in Alaska’s history lay almost literally one atop the other – the pristine wilderness, the intrepid exploitation of mineral wealth, and bush Alaska in its authentic late-twentieth century form. There is not an iota of fakery here.” (page 9)

“Both preservation of structures and safety for visitors demand a response.” (page 11) “A minimal-intervention strategy is proposed here [including] Basic stabilization... to protect the outlines of the historic landscape while maintaining the possibility of a sense of discovery and a sense of spontaneity.” (page 13)

1991 – A Partnership Proposal, NPS: “The special resource value of the Kennicott area stems from the uniquely Alaskan experience offered by the combination of history, scenery, and the small community of people living in the area.”.... [The] traveler arrives awestruck by the magnificent scope and sweep of the Alaskan landscape.... (page 6)

1997 – Kennecott Acquisition Past, Present and Future, NPS: “What is (to be) maintained is the sense of ... a site abandoned but still haunted by past residents, a place that has not been... sanitized. It is a place of discovery for the visitor, but one where investigation and inquiry can be done safely and with respect for the remaining historic objects and structures.” (page 25)

1998 – Partnership Management Strategy, by Mike Loso with funding from NPS and SHPO: Created with extensive stakeholder input, this report contained the first articulation of the “Management Concept,” which then carried through into the NPS-adopted 2000 Kennicott Interim Operations Plan, e.g., “stabilized,” “light touch,” “minimal intervention,” “community spirit,” “slow pace,” “reasonably diverse economy,” and “small-town values,” among others. This report also emphasized and articulated the benefits of partnerships.

1998 – Department of the Interior Press Release and Fact Sheet announcing the NPS acquisition of Kennecott: “The Kennecott property will be owned by The National Park Service and managed in partnership with one or more local non-profit organization such as the Friends of Kennicott....”

“‘Ownership of Kennecott puts the National Park Service in the position of working directly with the community so that the Kennecott visitor experience is maintained at a very high quality for generations to come,’ according to Jon Jarvis, superintendent for Wrangell-St. Elias National Park.”

“While the Park Service and the Friends of Kennicott expect to continue the work to stabilize some of the major structures, complete restoration is not considered an option.”

2000 – Kennicott, Alaska: “No one has fancied the place up:” Article by Logan Hovis, NPS Mining Historian: “Kennicott now stands as a monument to the perseverance and ingenuity of the prospectors and the mine developers.... Spectacular as the cultural landscape is, the mining camp is dwarfed by the natural landscape.... The physical evidence of the past is bound up in the life of the present... [V]isitors have the rare opportunity to discover the past on their own terms. Kennicott does not present a cleaned up and sanitized version of history.”

“The challenge faced by the Park Service and its partners in the preservation process is to stabilize the site and tell the story of mining in the Wrangells without destroying the very qualities that give Kennicott its special character: its rich collection of mining buildings and artifacts, the all too rare sense of isolation, and the joy of discovery that is already present in the living communities of Kennicott and McCarthy. These qualities need to be protected, not transformed into something that never was.”

2000 – Kennecott Interim Operations Plan, NPS: This adopted plan carried forward the 1997 NPS vision statement about maintaining a “site abandoned but still haunted...”, and the Management Concept anchored in “light touch” stemming from the original 1990 Sax report and the 1998 Partnership Management Strategy.

2011 – Interpretive Concept Plan, NPS (final draft): “Kennecott was born, died, and reborn. Multiple contradictions exist there, side by side. It is a product of nature and a construct of human ambition. Massive buildings are swallowed by the panorama of Alaska’s glacial wilderness. Kennecott is abandoned yet occupied. Public and private. Ruins coexist with restorations. The global reach of the corporation stands in marked contrast to the isolation of the setting. Kennecott is Alaskan, ethnic, and American history. Workplace blends with marketplace and living space. Manager lived near miner. Capitalism showed both its paternalistic and benevolent faces. Ingenuity and innovation flourished in service to an exhaustible supply of natural resources. Boom yielded to bust....

“A central interpretive message—change—helps unify diverse perspectives, resources, and values. Persistent succession of natural processes entwined with layers of human history make Kennecott NHL one of America’s treasures.” (Summary, page 1)

The present plan should clearly state that it builds from this foundation.

### **Purpose and Need**

To supplement the planning context above, the following factors significantly contribute to the “Purpose and Need” for the revised and updated Kennecott Operations Plan:

- The 2001 “interim” plan is out-of-date and new direction is needed to address contemporary issues.
- Implementation (or lack thereof) of portions of the 2001 plan had become controversial, particularly the loss of NPS institutional memory and the lack of ongoing community input.
- The need to institutionalize a more rigorous process to insure that previous implementation failures do not recur.

- The wise decision to resolve key Kennecott issues prior to initiating Frontcountry planning for the Wrangell-St. Elias National Park and Preserve (WRST)
- The need to articulate the Park’s view of the community-supported management concepts in the 2001 plan
- The need for coordination with the Kennecott Interpretive Plan

### **Affected Environment**

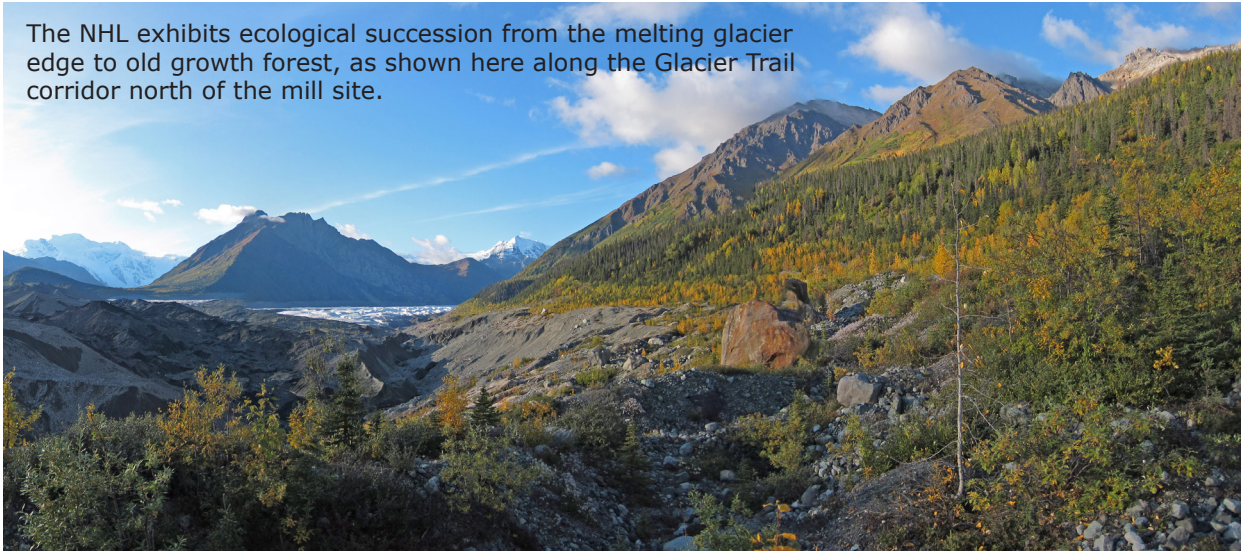
This chapter of the environmental assessment needs to recognize that “Kennecott” is much more than a historic mining district. Kennecott encompasses several important geographic and administrative overlays, including the National Preserve designation, the National Historic Landmark, and a World Heritage Site. Even without the exceptional mining history, the area would be a key visitor destination due to the high value and accessible natural features.

Diverse resources & values within the NHL boundaries:

1. Historic Kennecott
  - a. Innovative technology, human achievement, national economic and political impact, and a wave of industrial development come and gone.
  - b. The setting and its relationship to the environment (e.g. stair-stepped 14-story mill building)
2. Outstanding and accessible glacier and alpine environments
3. Trails and camping areas of national significance
4. Highest concentration of park/preserve visitors experiencing the natural environment of the park.
5. Local observance of the dramatic evidence of climate change, specifically the accelerated Little Ice Age glacial retreat and accompanying ecological succession.



The NHL exhibits ecological succession from the melting glacier edge to old growth forest, as shown here along the Glacier Trail corridor north of the mill site.



## Key Management Concepts

### “Light Touch”

The plan should explain the various aspects of “light touch,” including but not limited to its relevance for maintenance of the buildings, and how it will be implemented in site operations and management. “Light touch” is founded on the notion that the site, its people, its histories and its communities are in themselves what are of value at Kennecott; that in their presence, visitors can discover and appreciate the significant stories; and that the job of the National Park Service is to take the minimum actions necessary to protect and make available the site, with administrative and management presence kept in the background, so that it does not intrude on the scene. Joseph Sax described “light touch” as “modest cost, least intervention . . . assistance where it is needed and wanted, a light and sympathetic encouragement, but not the heavy hand of control and dominion.” The “light touch” approach makes room for the interpretation of Kennecott’s cumulative and evolving historic, cultural, geologic, and environmental elements by providing a lightly stabilizing lens through which each element may be seen, explored and understood in context. It implies that the full value of Kennecott will be developed by the actions of multiple stakeholders, with the Park Service primarily in the roles of partner and facilitator, and of protector of the national interest. Regarding the physical preservation of the mill town, the “light touch” vision seeks to maintain the abandoned feel which visitors find so compelling.

### “Change”

The June, 2011 Interpretive Workshop in McCarthy, involving multiple stakeholders and a facilitator, was very successful in identifying several key themes, all linked through the core concept of “change.” The results of this workshop are reflected in the Kennecott Interpretive Plan, a separate [tiered] effort to be incorporated into the Kennecott Operations Plan. The “change” theme is supported by the “Cultural Heritage” Significance Statement in the WRST Foundation Statement: “Preserved within Wrangell-St. Elias National Park and Preserve is

abundant evidence of more than 3000 years of cultural and technological development. This long history reveals a range of human adaptations to changing climates, environments, and economic circumstances.”

### Connecting “Light Touch” and “Change”

The concepts of “light touch” and “change” are mutually supportive. For example, the Landmark illustrates several successive and dynamic phases:

1. Prior to the mining era, Kennecott was (and in most ways remains) a vast wilderness, characterized by rapid, and dramatic geological and ecological change – initially traversed by a handful of intrepid Native residents and explored only relatively recently by prospectors.
2. Almost overnight, a large-scale industrial mining complex is established using state-of-the-art technology. This complex is perched on the fringe of a glacier, accessed by a modern railroad through some of the most challenging terrain on earth.
3. Again overnight, the largest copper mine in the world shuts down and the last train pulls out, leaving an intact “ghost town” that persists for decades.
4. The industrial landscape is incrementally overtaken by natural processes – increasing the sense of abandonment and the passage of time.
5. A small but vibrant community of self-reliant rural Alaskans takes root.
6. With the eventual establishment of the surrounding national park in 1980, a new emphasis emerges on the Kennicott Valley as a gateway to one of the largest wilderness preserves on earth.
7. The emergence of a number of small businesses that take pride in offering locally-based, appropriately-scaled tourism services.
8. The NPS acquisition of the Kennecott Landmark 18 years later adds public/private/non-profit partnerships blending historical preservation, interpretation, education, and wilderness recreational endeavors consistent with the “light touch” approach.

Taken as a whole, the Kennecott Landmark and its surroundings showcase the dynamic natural forces of geologic upheaval, erosion and ecological succession; provide a testament to human fortitude, twentieth century political and economic power, and mining technology; and illustrate the tenuousness and fragility of development in a wilderness landscape, and the regenerative possibilities inherent in humanity. Kennecott offers a unique opportunity to contemplate each of these elements – and the fundamental thread of “change” that links them in a meaningful way.

### Juxtaposition of Natural and Human Values

The NHL is not only an important historic area, but also the place where the largest number of visitors experience the environment and wildness of the park. The plan should identify this juxtaposition of natural and human values as one of the attributes that makes Kennecott truly nationally and internationally unusual and significant, bringing visitors from across the country and around the world. Not only are the wild and natural Wrangell Mountains a few steps away from the mill town – that same wild nature penetrates and intertwines with the town core itself, becoming part of the historic scene. Maintaining that unique relationship should be a management goal factored into all decisions, especially in townsite vegetation management and in viewshed management along roads and trails.

In addition, the activities and lifestyles of local residents are a primary attraction for park visitors, who appreciate their experience of the people as well as the geologic, natural and historic features of the place. Finding ways to support healthy continuation of this community should thus be an integral part of the Park Service agenda at Kennecott.

### Partnerships

The plan should recognize that partnerships are essential in the management of Kennecott and include commitments to work with others. The value of partnerships is already illustrated in the recent history of the larger Kennecott/McCarthy community. Partnerships can take the form of formal agreements (such as the series of Kennecott Recreation Hall agreements between the NPS and Friends of Kennicott and the Wrangell Mountains Center wherein the NPS delegates certain specific responsibilities to another entity); or more informal cooperation and collaboration toward mutually-beneficial goals (such as the NPS installation and MAC maintenance of the certain public outhouses); or simply good-neighbor efforts that extend beyond narrow private business models to serve larger public goals (such as the Wrangell Mountain Air shuttle service and the Rowland service bridge across the Kennicott River).

Unlike most national park system units which are entirely or almost entirely public land physically separated from surrounding communities, Kennecott is a mixture of public and private property embedded within the active town of McCarthy-Kennecott. In a practical sense, many, perhaps most, issues and initiatives in Kennecott or the surrounding area require at least cooperation and at best collaboration, where frequently neither the NPS nor other stakeholders alone have the authority or resources to come up with needed creative solutions to complex problems. For example, the above-referenced controlled vehicle access across the Kennicott River and the shuttle service to Kennecott are operated completely outside NPS jurisdiction – and the NPS recognizes it cannot manage Kennecott well without them. Similarly, local individuals and businesses benefit from, for example, NPS building maintenance, facilities, public safety services, trash removal, and exhibits at Kennecott. Thus each stakeholder, including NPS, has a vital interest in the success of others, and in how these activities are conducted; while the traditional NPS model of regulation and control is substantially limited here.

Building on the model of collaborative renovation and operation of the Kennecott Recreation Hall, NPS should seek additional opportunities for bringing local organizations into the active operation of Kennecott, consistent with the resources of those organizations and the legal and regulatory mandates of the agency.

Maintaining a healthy and mutually-supportive relationship with the local business community, which provides virtually all of the Landmark's visitor services, is also essential. The fact that all businesses in the McCarthy/Kennecott community are indeed local and independent is a valued asset. Supporting stability and creativity among local entrepreneurs will benefit visitors, the NPS and the community at large – and forestall the day when people might buy pizza from a Pizza Hut instead of Tailor Made Pizza.



The concept of partnerships also extends to public involvement, as discussed below under Implementation.

### **Implementation**

As previously noted the final Plan will generally be conceptual, with numerous and on-going, iterative, public involvement processes needed before on-the-ground decisions are made. Recent experience (e.g., the proposed placement of treated wood in National Creek) illustrates how failure to consult with the local community on proposed activities leads to a lack of trust, erodes the public involvement process and can result in delay, unnecessary expense and suboptimal solutions.

The Interpretive Workshop also identified an implementation strategy involving general conceptual agreement on the primary themes and reserving the details associated with each project to more in-depth evaluation with active community involvement.

Therefore, for the NPS to fulfill its mission, its partnership with the community must extend beyond formal public meetings and opportunities to comment on plans and rules. The fabric of cooperation must be ongoing, including:

- frequent informal discussions between park staff and local organizations, businesses and individuals;
- a pre-established schedule of NPS public meetings;
- attendance of park representatives at meetings hosted by non-NPS local issue-based committees, working groups and organizations; and
- provision of information and solicitation of comment about upcoming park actions prior to planning and budget decisions.

To maintain accountability and insure that future process commitments at Kennecott do not fall through the cracks (an admittedly challenging assignment) Friends of Kennecott further recommends a single person on the park staff be responsible for:

- Ongoing education/orientation of existing and in-coming NPS personnel about the content of the Kennecott Operations Plan
- Monitoring all project work taking place in and around Kennecott to insure that the work is consistent with the Plan.
- Facilitating local community input at the appropriate time.

We further recommend this designated “gatekeeper” be at a management level, having some familiarity with activities at the local, park-wide and regional levels. The overall Kennecott Project Manager may be the most suitable position for this assignment.

### **Comments on Selected Proposed Action Details**

#### Parking

We endorse the MAC recommendation that there should be no parking on the easements or adjacent land without the underlying landowner’s permission.

### Other Easement and Covenant Issues

Because questions have arisen during various community meetings and discussions this summer, we request the plan clarify the basic facts surrounding the separate topics of covenants and easements, especially since they are often confused. Friends of Kennecott appreciates Doreen Sullivan's email clarification to the MAC membership about some of the access issues, for example the lack of applicability of RS 2477 within the Landmark due to the mining withdrawals in the early 1900s.

### Noise

The increasing noise in Kennecott adversely affects both landowners and visitors. The natural ambient sounds (e.g., wind, birds, rocks sliding off the glacier) are rarely heard and appreciated during the day because they are typically drowned out by the sound of generators, construction equipment, music, and vehicles. NPS is a contributing source of all these noise intrusions, although the entire Kennecott community "owns" the problem. As the party most responsible for most of the noise in Kennecott, we request the NPS take a leadership role by prioritizing efforts to reduce NPS generator and construction noise, including minimizing noise-producing operation times, employing the best available sound dampening technologies, and minimizing vehicle use through more efficiencies and more walking. The scheduling of construction and maintenance should consider ways to consolidate noisy periods and attempt to establish some quiet(er) periods during portions of the day or week. We recognize this is a challenging request; however, we feel it deserves careful attention and action.

### Local Hire

We appreciate the long-standing commitment to and excellent track record of local hire in WRST, especially on the NPS maintenance crew. At the same time, we are disappointed in recent losses of local hire opportunities. We understand that some changes may be due, in part, to changing national policy; however, we request improved utilization of local hire, especially in interpretation, where:

- local residents have a wealth of "special knowledge or expertise" (ANILCA Sec. 1308),
- local residents have a strong sense of place and can serve as effective park advocates,
- the involvement of the local community is part of what attracts visitors to Kennecott and is consistent with the principles of partnership.

Based on experience gained in WRST, we also recommend the park support efforts at the state and national level to promote a sound local hire program consistent with ANILCA.

The park also needs to develop a policy that clearly articulates how and when local park employees may make their personal views known, including ground rules about how and when it is appropriate for employees to participate in public involvement opportunities. Such a policy should follow a candid discussion between the NPS and affected employees about the challenges of implementation for both NPS and employees.

### Vegetation

While vegetation clearing for fire protection is important and necessary, the plan should specify

that site-specific decisions regarding clearing distances and standards will be made with consideration of the multiple site values and the fire risk entailed, with flexibility to deviate from fixed standards to meet management goals. (Such flexibility is no different than that involved in most Kennecott decisions.)

It should also state that fire specialists will conduct their work with the same high level of ongoing public involvement as the other management aspects of Kennecott. This comment reflects our concern regarding a crew of NPS fire specialists who were on site this past summer evaluating possible firebreak options, apparently without being informed about or participating in the ongoing Kennecott planning process; firebreaks are not mentioned in the Proposed Action. An important point here is that any Kennecott action, no matter how apparently non-controversial, should be conducted within the communication and collaboration framework established by the plan, to avoid repetition of reactive situations like that ensuing regarding placement of treated timbers in National Creek.

#### Management of Structures under “Light Touch”

Without a larger context and vision, it is understandable that the Proposed Action would confuse “light touch” with “Standards for Treatment of Historic Properties.” Among other things, the light touch concept informs the selection of such treatments (or lack of treatments) for any given structure. The Proposed Action (page 4, 2<sup>nd</sup> bullet) says the NPS “*can’t support*” the light touch model. Yet the plan proposes that several structures will be “*managed as ruins*.” In our view, this is, in fact, a light touch model. At the other end of the spectrum, light touch does not mean that all structures must be managed as ruins. For example, to illustrate and interpret the active mining years, a few structures have or will be “*restored*” (e.g. GMO, Company Store). Others (e.g. hospital) can be “*stabilized*” to retain their current character that illustrates the passage of time and the structures’ simultaneous durability and fragility. Still other structures (e.g. West Bunkhouse) can be “*adaptively reused*” in new ways that are compatible with the over arching vision outlined above. As illustrated here, numerous tools in the Secretary’s “Standards” are applicable to the light touch approach. In addition, the Landmark needs a diversity of “treatments” to tell the full story in a way that illustrates the passage of time and the sense of “change.”

#### “Replication”

Friends of Kennecott recommends NPS avoid “replicating” original features (e.g. signs) or artifacts that are now lost, especially exterior features, if such replication would cast doubt on what is new and what is old. Part of Kennecott’s intrinsic value is the authenticity, which is inextricably linked to the sense of abandonment following the sudden closure of the mine. If used – judiciously – inside buildings to enhance an understanding or interpretation, it should be clear to the visitor what is original and what is a replication.

#### Reconstruction of lost buildings

Friends of Kennecott does not support the wholesale reconstruction of previous buildings that have been lost to time. Sufficient structures remain to tell the mining story without artificially turning back the clock. Small-scale reconstruction of selected features or portions of buildings may be suitable in discreet circumstances (e.g. putting a roof back on the Mill), but should

only be employed when necessary and consistent with the “light touch” vision, which portrays Kennecott’s active mining days within a larger continuum of time.

#### Window Replacement

We recommend not replacing windows in buildings that will be stabilized but not fully restored or adaptively used. This is especially applicable to the Mill building. There may be valid reasons for reinstalling windows (e.g., fire safety, moisture, building security); but doing so significantly changes the appearance and experience of the structure and should be avoided if possible. As other buildings are either restored or allowed to further deteriorate, the iconic Mill is increasingly important as an expression of the light touch model that simultaneously illustrates change, authenticity, and resilience. Reinstalling windows with new glass would diminish the airy, wistful feel of the wind blowing through the building, distort the passage of time, and paper over Kennecott’s post-1938 history of local residents adopting and reusing useful building materials in a remote setting – something different from what would now be simply considered theft. The question of reinstalling some or all windows in the Mill building is a prime example of a key decision detail that lends itself to further discussion with stakeholders to weigh the pros and cons.

#### Paint

As with windows, Friends of Kennicott recommends a very judicious approach to covering old paint with new. The new paint, while quite close to the original color, is not identical in overall appearance; but more importantly the new paint is inherently not “old.” The original red paint is famous for its longevity and resilience. Yet as more new paint appears, the perceived character of the old paint changes by comparison. Obviously, some paint will be necessary, such as when new wood is used, so it is not reasonable or desirable to completely avoid all new paint. Has the NPS investigated options for alternative preservatives that would retard deterioration of the wood surface and the old paint without substantially changing the look? “To paint or not to paint” is another example of a decision detail that deserves thoughtful discussion and careful choices.

Once again, thank you for the opportunity to participate in a fruitful and creative planning process for Kennecott.

Sincerely,



Ben Shaine  
President, Friends of Kennicott