

## SUMMARY OF PUBLIC COMMENTS

### Proposed Action for Management of Kennecott Mines National Historic Landmark

#### 1. Background

In May, 2011, Wrangell-St. Elias National Park and Preserve (WRST) distributed a Proposed Action for Management of Kennecott Mines National Historic Landmark. The document is a prelude to the Kennecott Operations Plan and Environmental Assessment and describes goals, protocols, and management proposals for National Park Service (NPS) management of the Kennecott Mines National Historic Landmark (NHL). The document was made available for public review throughout the course of the summer and NPS accepted comments until September 16, 2011. Additionally, NPS held a series of meetings throughout the course of the summer to discuss the document and facilitate public review.

The McCarthy Area Council (MAC) formed a sub-committee to review and comment on the document. Their review took place over the course of the summer. Their comments were submitted to NPS in the form of a re-write of the document.

#### 2. Summary of Comments

NPS received 31 written comment letters on the Proposed Action for Management of Kennecott Mines National Historic Landmark. These included the MAC subcommittee re-write, which was signed or otherwise endorsed by 43 individuals. Several individuals (4) signed the signature sheet as specifically opposed to the re-write, but only one specified why. Friends of Kennicott also submitted a comment letter, generally supporting and supplementing the MAC subcommittee re-write. Comments were received from several other organizations or agencies, including Alaska Quiet Rights Coalition (AQRC), the State of Alaska, and National Parks Conservation Association (NPCA).

The following summary generally characterizes public comments by general topic so that reviewers can get a feel for which issues are close to consensus and which issues are not. It is in no way meant to specifically portray or represent individual comments. Organizations are specifically named, individuals are not.

**Management Concepts:** The MAC subcommittee and Friends of Kennicott continue to support the concept of “light touch” (as defined in past planning documents) as a community vision for management of the NHL. They support using the Management Concepts as a standard by which proposed projects are reviewed by NPS and the community. They support NPS/community meetings to work on defining “light touch” relative to NPS policy and guidance on treatment of historic structures (specifically, the Secretary of Interiors Standards for Treatment of Historic Properties). These concepts were generally supported by commenters, though six commenters specifically opposed the concept of “light touch” relative to historic building stabilization/preservation and support whatever measures are necessary to preserve historic structures for generations to come.

**Partnerships:** The MAC subcommittee and Friends of Kennicott commented that the plan should recognize that partnerships are essential in the management of Kennecott and include commitments to work with others. They commented that 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 resources to come up with needed creative solutions to complex problems. These comments were widely supported. One commenter suggested that partnerships relative to non-profits and concessions need to be expanded to include the greater Copper River valley.

**Local Hire:** The MAC subcommittee and Friends of Kennicott commented that ANILCA provides for local hire, that local hires provide invaluable local knowledge and expertise, and that NPS should always first endeavor to fill positions in the NHL with qualified local residents. Several additional commenters specifically supported local hire and no commenters opposed it.

**Communications:** The MAC subcommittee and Friends of Kennicott suggested an NPS/community communications protocol that includes: 1) spring and fall meetings; 2) subject matter specific meetings during the course of the summer; 3) review/update of the Kennecott Operations Plan every five years; 4) a protocol for informing the community of upcoming meetings; and 5) provision of information and solicitation of comment about upcoming park actions prior to planning and budget decisions. Several additional commenters specifically supported this protocol and no commenters opposed it.

**Motor Vehicle Use within the NHL:** The MAC subcommittee requests that the NPS take the following actions:

- Post signs and circulate brochures notifying members of the general public (not including residents of the McCarthy/Kennecott region) that they are welcome to use the rights-of-way on foot or bicycle, and to come to Kennecott on the shuttle vans, but that no visitor ORVs, motorcycles, or other motorized vehicles are allowed in Kennecott. This restriction will in no way be seen to limit the rights of local residents within the NHL and residents of the greater McCarthy/Kennecott community (as guests of the NHL residents) to use their motor vehicles on the rights-of-way within the NHL.
- Notify ORV user groups throughout Alaska of the restriction of ORV use in the NHL.
- In conjunction with local businesses, provide adequate parking for the motor vehicles of non-local visitors outside the NHL.

NPCA and AQRC are opposed to recreational ORV use in the NHL but support ORV use by locals and for subsistence purposes. Eight commenters (submitting six comments) objected to the actions proposed by the MAC subcommittee and would like to see ORV use continue as a means of visitor access to the NHL. These commenters noted that ORV access for visitors will facilitate increased visitor use of the NHL, that the actions as proposed by the MAC subcommittee are “unenforceable”, and that “local” is not well defined. All commenters were supportive of ORV use in support of subsistence activities. The State of Alaska asked the NPS to recognize the access provisions of ANILCA in their planning process.

**Parking:** The MAC subcommittee and Friends of Kennicott endorse the development of a Memorandum of Understanding between NPS and NHL landowners that includes: 1) designated and limited parking

areas within the NHL, with exceptions for ADA and subsistence uses; 2) no parking restrictions during the winter months; 3) courtesy parking for remote access landowners; 4) NPS parking area for employees at the Dairy Barn; 5) NPS set an example by having employees and contractors utilize shuttle vans; 6) public education regarding lack of parking in the NHL.

Two commenters suggested developing more parking for visitors within the NHL.

**Kennecott Arrival/Orientation:** The MAC subcommittee and Friends of Kennicott suggest a “series of public meetings” in summer of 2012 to discuss the arrival and orientation of visitors. This includes “what to do with the shuttle turnaround” and considering the needs of local businesses that operate the shuttle service. NPS has proposed improvements to the shuttle turnaround as part of this planning process that would facilitate its use for that purpose. Six commenters (in five comment letters) specifically supported the use of the current shuttle turnaround (with proposed improvements) for the intended purpose.

**Roads:** The MAC subcommittee and Friends of Kennicott encourage ADOT&PF to maintain the State Right of Way, from McCarthy to Kennecott, as a one-lane gravel road that maintains its historic character. Two individuals specifically supported this concept and added that ADOT&PF and NPS need to consult with adjacent private landowners prior to any proposed brushing or widening of this road. One commenter supports ADOT&PF improvement and widening of the road to enhance the visitor experience and improve safety.

**Trails:** The MAC subcommittee and Friends of Kennicott support maintaining local existing trails (Root Glacier trail, Bonanza trail, and the Wagon road) as non-motorized for Kennecott visitors. They support the proposed trail alongside the Kennicott Glacier. Five commenters specifically supported this proposed non-motorized trail; one commenter specifically opposed it because of a concern for bringing additional visitors into the specific area; and one commenter has concerns about potential for bear encounters. Three commenters asked for consideration of additional non-motorized trails in the area; and one commenter noted that trails that are currently motorized should stay motorized.

**Walk-in Campground:** The MAC subcommittee supports this concept, as long as public input is sought and the potential for increased bear/human interactions is taken into account. Several commenters specifically supported this concept; one commenter specifically opposed it because of impacts to existing local activities in the area.

**Mill Site Water System, Fire Suppression system, and Sanitary Sewer system:** The MAC subcommittee neither support or oppose these proposed systems, but demand that the NPS consult with the community and specific affected Kennecott residents during the design phase of these projects, prior to National Environmental Policy Act (NEPA) compliance or implementation. They ask that NPS give full consideration to the effects of the proposed systems on water quality and quantity, wildlife, landowner access, natural soundscape, and scenic quality. Five commenters expressed similar concerns regarding potential impacts to landowner access, water quantity, scenic quality, and wildlife.

**Power Generation and Distribution:** The MAC subcommittee asked for the development of a power generation and distribution plan, based on projected power requirements for the next 10 to 20 years. They ask that NPS use state-of-the-art technology to minimize the noise associated with the generator and that NPS give serious consideration to the use of alternative energy sources, including solar. Several other commenters asked that NPS give consideration to solar power. The consideration of hydroelectric power got mixed reviews—MAC subcommittee supports it for consideration as long as it “does not affect the flow, clarity, or purity of the source creek, as these creeks are essential water sources for local residents.” Two commenters specifically oppose consideration of hydroelectric power and two commenters specifically support it.

**Use of concessions for mill building (or other) tours at Kennecott:** Several commenters support this concept, as long as competition for the concession is open. Two commenters specifically oppose the use of a concession, citing as reasons that taxpayers should not have to pay to see the mill and that NPS can do a fine job. One commenter suggested that NPS needs to consider concessions with eligible Native entities.

**Interpretation:** One commenter noted that NPS interpretation of the NHL needs to include information regarding glaciers, succession, climate change, local people/community, and the dynamic environment. Four individuals commented that Silk Stocking row should not be included as part of a “self-guided walking tour” for visitors because of all the private residences in that area.

**Noise:** Several commenters, including the MAC subcommittee and Friends of Kennicott, noted that the increasing noise in Kennecott adversely affects both landowners and visitors. Commenters requested that the Environmental Assessment consider the impacts of proposed activities on the natural soundscape and that NPS provide leadership in noise mitigation.

**Vegetation:** One commenter noted that vegetation should not be managed to replicate 1938 conditions. Friends of Kennicott asked 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.” Two commenters noted that exotic plant species control should not include the use of herbicides.

**Zone by Zone proposals:** The following comments were made:

- Regarding small scale features, most commenters opposed “reconstruction” of these features (such as utilidors or boardwalks) as being inconsistent with “light touch” management concepts. One commenter supports full restoration of boardwalks in the Administrative zone, and two commenters support boardwalk restoration in specific locations.
- Friends of Kennicott does not support reconstruction of “lost” buildings.
- Friends of Kennicott does not support replacing windows in buildings that will be stabilized but not fully restored or adaptively reused. They also recommend a “very judicious approach to covering old paint with new.”

- Two commenters do not support any new road construction associated with building stabilization.
- One commenter has concerns about safety hazards associated with the old tram lines.
- One commenter opposes the re-roofing of the tram terminus.
- One commenter opposes rebuilding the Machine shop decks.
- One commenter notes that an elevator in the Company Store seems like overkill.
- Several commenters support re-locating or retaining archeological resources in their historic locations.
- One commenter supports full restoration, to 1938 conditions, of the Administrative Core zone.