



United States Department of the Interior NATIONAL PARK SERVICE

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November 30, 2011

To McCarthy Area Council:

This letter and the attached revision of the Proposed Action for Management of Kennecott Mines National Historic Landmark is being sent to all individuals and groups who commented this summer. First, thank you for providing the re-write of the Kennecott Operations Plan proposed action package. I appreciate the time that the MAC sub-committee spent in developing the re-write. The staff at Wrangell-St. Elias National Park and Preserve (WRST) is committed to a partnership with the community and open dialogue about all facets of management at the Kennecott Mines National Historic Landmark (NHL).

Staff at WRST met on October 12th and 13th to review public comment on the Kennecott Operations Plan proposed action package and to modify the proposals and protocols based on public comment. Those attending the meeting were: Elwood Lynn (acting Superintendent), Wayne Challoner (Chief of Maintenance), Jim Baker (Kennecott Maintenance Supervisor), Jon Colson (Kennecott Program Manager), Stephens Harper (Kennecott District Ranger), Greg Biddle (Cultural Resource Manager), Miranda Terwilliger (Ecologist), Eric Veach (Chief of Resources), Todd Stoeberl (Chief of Interpretation), Mark Keogh (Concessions), Annie Lain (Exotic Plants Specialist), Carol Harding (Exhibits Specialist), and Bruce Rogers (Planner). The staff reviewed all the public comments but focused on the MAC re-write. The attached revision is a product of the two-day session and represents a modified version of the Proposed Action for Management of Kennecott Mines National Historic Landmark.

I want to emphasize that the attached document is NOT the Kennecott Operations Plan. It is a representation of a National Park Service (NPS) proposal on how to manage the NHL for the next 10 – 15 years, in partnership with the McCarthy/Kennecott community. Based on public comments and the need to highlight certain issues, we will now develop management alternatives. Alternatives will be developed around varying degrees of historic building preservation, different trail development scenarios, development of NPS utilities and infrastructure, and different approaches to managing motorized use. We do not intend to develop alternatives around the described goal statements or protocols for communications or local hire. Management alternatives will then be described and their effects discussed in an Environmental Assessment, a public-review version of which will be available for public comment this spring. Based on a consideration of environmental effects and public comment, elements of the proposed action and/or alternatives that will result in the Kennecott Operations Plan will be described in a Decision Record/Finding of No Significant Impact.

As you review the attached document, you will see that most portions of the MAC re-write have been incorporated but others have not. In the interest of open dialogue with the community, I will explain, in the following narrative, the organization of the attached document and why some portions of the MAC re-write were omitted. The following narrative is organized based on the attached document:

Section 1: Introduction

We have incorporated all of the MAC subcommittee's re-write into this section, as it provides valuable background information and expands on our explanation of a purpose and need for the Kennecott Operations Plan.

Section 2: Applicable Laws, Regulations, and Policy

In the MAC subcommittee re-write, this section was moved to an Appendix. We moved it back into the body of the document because NPS is mandated to manage consistent with these laws, regulations, and policies and we feel it is important for the public to understand them. While we value and respect the partnership we have with the Kennecott/McCarthy community, we also answer to a national audience. In the Interim Operations Plan, there was a section on Management Concepts that presented the McCarthy/Kennecott vision for management of Kennecott, but there was no section (either in the IOP or accompanying EA) that described laws, regulations, and policy. We feel that a lack of knowledge of those laws, regulations, and policies has been one contributing factor in the perception by some in the community that NPS has deviated from the direction described in the Interim Operations Plan.

Section 3: Management Concepts

We omitted the description of the four primary concepts. First, we felt that these numbered statements were repetitive with the discussions of partnerships, subsistence, local hire, and management concepts that occur later in the document. Secondly, after the presentation of laws, regulations, and policy in Section 2, we can't agree that the four primary concepts will guide all management of the NHL.

We retained the introductory/background descriptions and of course the bullet statements of the management concepts. As explained in the attached document, NPS generally supports the Management Concepts as long as they are consistent with laws, regulations, and policies presented in section 2. We feel that our actions in most facets of NHL management have adhered to the Management Concepts described in this section. Specifically, our management of vegetation, interpretation, small scale features, partnerships, concessions, and local hire have mostly adhered to these concepts. Additionally, most of the work done to this point on the stabilization of historic structures would fit under the "Preservation" class of work identified in the Secretary of Interior's Standards for Treatment of Historic Properties. Note that this is the lowest class of building treatment that is recognized. Notable exceptions are for buildings that have been adaptively re-used, and identified for such treatment (with community input) in the Interim Operations Plan. We will be glad to work with the community in defining the concept of "light touch" relative to the Secretary of Interior's Standards for Treatment of Historic Properties. As noted in the comment letter from Friends of Kennicott, we are probably closer than we think on this issue.

Section 4: Specific Goals and Protocols of NPS and the McCarthy/Kennecott Community for Management of the NHL.

General Goal: We did not include the MAC re-write portion. We feel that MAC's requests in this omitted portion are covered under the identified protocol for Communication and by our agreement to work with the community in defining "light touch" relative to the Secretary of Interior's Standards for Treatment of Historic Properties.

Partnerships: We slightly re-worded the definition of partnerships in the first paragraph. We omitted the second portion of the second paragraph of this section as being too prescriptive and tying our hands to the point of potentially conflicting with our own laws, policies, and direction.

Local Hire and Participation in Public Meetings by Local Staff

Local Hire: We omitted paragraphs two and three. These are good comments that support your point and they will be kept for the record but we didn't feel they were necessary as part of a description of a protocol. We modified your suggested hiring protocol in the interest of time. If we advertise first under the excepted hiring authorities and can't hire anyone off the list (or no one applies) it puts us very late in the game for advertising nationally. So we propose to do it concurrently.

This park has a proven track record of working within the system to hire locally. It makes sense for us in a lot of ways, including those that you have outlined in your re-write. However, we reserve the right to not hire locally if local hires have performance issues or can't support the NPS program for which they are working.

Civic Engagement by Park Employees: We agree that a park policy would be useful, and we will develop one, taking your suggestions into consideration, and make sure all seasonal employees are aware of it. We feel, however, that such a park policy is more appropriate for the park's Employee Handbook, not the Kennecott Operations Plan.

Communications: Most portions of the MAC re-write have been incorporated. This in combination with the elements that NPS originally proposed combine to make a very extensive communications protocol. We did not commit to inviting specific local residents to specific meetings. We will follow a protocol for posting and advertising meetings that will ensure that anyone who wants to be involved can be involved. Individuals need to take some responsibility to stay informed.

Small Scale Features: We did not include the MAC rewrite addition to this goal statement because it is too restrictive. Please review the modified building-by-building description of small scale features to see that we generally are not proposing reconstruction of these features.

Vegetation: We cannot commit to annual monitoring and/or reporting on rare plant species in the area.

Subsistence: This is re-written to acknowledge this activity and that ANILCA allows for it.

Section 5: Architectural Control Committee

This section was re-written, utilizing the MAC re-write. It now describes what the Architectural Control Committee is, how the covenants may be revised, and clarifies who is responsible for enforcement of the covenants.

Section 6: ZONE BY ZONE PROPOSALS

Buildings and Structures

We incorporated the first portion of the MAC re-write for this section, including the agreement to meet with the community to define "light touch" relative to the Secretary of Interior's Standards for Treatment of Historic Properties. We omitted the last paragraph. We will not commit to using the Management

Concepts as the final standard by which projects live or die. Please see the discussion above under Section 3, Management Concepts.

Zone by Zone Proposals

We included this description here, not as an Appendix. This is the “nuts and bolts” section of the proposed action. Please note modifications made, particularly under *Small Scale Features* and *Vegetation*. Proposed *Interpretation* items now reflect the Interpretive Concept Plan that was a product of community participation last summer.

Transportation/Access

Kennecott Arrival/Orientation: This section of the MAC re-write has been incorporated. We look forward to meeting with the community in the summer of 2012 to discuss these issues. We have noted that we have begun to address the bulleted issues, either through the Interpretive Concept Plan or proposals for the shuttle turnaround described in the attached document.

Motor Vehicle Use Within the NHL: We have incorporated all of the MAC subcommittee’s re-write. Based on other public comment on the issue, we will consider alternatives to the described proposals in the upcoming EA.

Parking: We have incorporated all of the MAC subcommittee’s re-write, with some modifications. We look forward to working with the community to address parking issues.

Roads: We still propose to make Silk Stocking Loop part of a self-guided walking tour, but will incorporate educational material regarding private land and respect for private property.

Trails and Glacier Access: We incorporated all of the MAC subcommittee’s re-write. Based on public comment, we will consider an alternative without the proposed Kennicott Glacier trail as well as an alternative that would consider other non-motorized trail opportunities.

Walk-In Campground: We incorporated all of the MAC subcommittee’s re-write. We also propose that the walk-in campground be accessible via a shuttle van. Based on public comment, we will consider an alternative without the proposed walk-in campground.

NPS Utilities and Infrastructure

Mill Site Water System, Fire Suppression system, and Sanitary Sewer System: Based on the current status of the design for these projects and the number of public comments received regarding the proposed water system, the Kennecott Operations Plan and Environmental Assessment will not serve as the NEPA compliance document for these projects. Instead, more specific design features will be presented and their effects analyzed in a subsequent site-specific EA. The same applies for the Fire Suppression and Sanitary Sewer System. The MAC subcommittee and other individual comments regarding these projects will be kept on the record, to be used in the development of a site-specific EA. Using the communications protocol described in Section 4 of the attached document, July 2012 would be a good month to tentatively schedule a community meeting that would provide design details for these proposed systems.

Power Generation and Distribution: Much of the MAC re-write for this section has been incorporated. The second paragraph has been re-worded to reflect NPS intent to build an enclosure around the generator to minimize noise. Some specific wording regarding seeking community input has been omitted because it is covered by the Communication protocol described in Section 4 of the attached document.

West Side Development: We incorporated the first portion of the MAC re-write but not the second. The second portion was omitted because we have made efforts to rent housing throughout the community and it is getting much harder. NPS is committed to improving the existing shuttle service for employees housed at the west side. This is described under *Parking* in the Transportation/Access section.

Solid Waste Management: We incorporated most of the MAC subcommittee re-write but modified it to reflect what has been done.

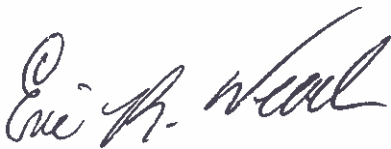
Summary

In order to move the planning process along, WRST and Regional Office staff will next be developing an Environmental Assessment, utilizing the goals, protocols, and proposals described in the attached document as the proposed action. Meanwhile, in the interest of maintaining an open dialogue with the community regarding these important issues, I welcome comments on the attached modified Proposed Action for Management of Kennecott Mines National Historic Landmark.

The attached document is in a Word format. If you wish to submit comments electronically, you can do so by filing the attachment and making comments in track changes. Or, you can summarize your comments in an e-mail or hard copy letter. Please submit comments to Bruce Rogers (bruce_rogers@nps.gov) by January 1, 2012.

Meaningful partnership and cooperation takes time and effort. Thanks for your participation as we work to develop a management strategy for the NHL and strengthen our relationship with the McCarthy/Kennecott community.

Sincerely,

A handwritten signature in cursive script that reads "Eric A. Veach".

Eric Veach
Acting Superintendent