

**National Park Service  
U.S. Department of the Interior  
Wrangell - St. Elias National Park and Preserve  
Alaska – Region 11**



**Kennecott Mines National Historic Landmark Management Strategy**  
*For National Park Service Managed Lands*



*1 Photo of Kennecott, NPS/Hart.*

## ***Contents***

Section 1: Introduction, Context, and Document Guide .....	3
1.1 Introduction and Context .....	3
1.2 Document Guide .....	4
1.3 Strategic Plan Purpose .....	5
1.4 Background .....	6
1.5 Physical Characteristics and Surrounding Lands .....	7
1.6 Need for an Updated Plan(s) .....	8
1.7 How this Document Differs from the 2013 KOP .....	8
1.8 Kennecott Management Planning Portfolio .....	9
Section 2: Strategic Management Goals and Concepts .....	11
2.1 General Management Concepts .....	11
2.2 Transportation, Access, and Circulation .....	13
2.3 Interpretation .....	15
2.4 Natural & Cultural Resources Concepts .....	16
2.5 Facilities, Utilities, and Infrastructure .....	18
2.6 Commercial Services .....	19
2.7 Hazardous Materials & Contaminants .....	20
2.8 Community and Partnership Goals .....	21
Section 3: Conclusion .....	22

### ***Photos and Maps***

1 Photo of Kennecott, NPS/Hart .....	1
2 Map of The Kennicott Subdivision, Highlighting Land Ownership Type .....	4
3 Map of 1986 NHL Boundary (Black) Overlaid with the Previously Accepted NHL Boundary (Dashed) .....	6
4 Photo of The McCarthy Road, Past (Bleakley Collection) and Present (NPS/Townsend) .....	14
5 Photo of A NPS Ranger and Visitors in Kennecott, NPS .....	15
6 Photo of National Creek, NPS/Townsend .....	16
7 Photo of The Kennecott Mill, NPS/Yarbrough .....	18
8 Photo of A Visitor Tour of the Mill Building Given by NPS Commercial Services Operator, NPS .....	19
9 Photo of Collecting Water Samples from National Creek During the Remedial Investigation in 2021, NPS .....	20

### ***Appendices***

Appendix A: Potential Implementation Measures	
Appendix B: Comment Response	
Appendix C: Foundation Statement	
Appendix D: NPS Facilities including Utilities and Infrastructure	
Appendix E: Transportation, Access & Circulation	
Appendix F: Vegetation Management	
Appendix G: Superintendent's Letter	

## Section 1: Introduction, Context, and Document Guide

### 1.1 Introduction and Context

The stories and resources of the Kennecott Mines have long been aligned with the cultural and natural themes related to the National Park Service (NPS). The historically rich and nationally significant site coupled with its vivid natural scenery were then, and remain today, sources of great inspiration.

It is important to acknowledge that Kennecott is a setting of inspiration — as soon as one steps foot in the historic landscape it is clear why this is a popular destination. The juxtaposition of industrial frontier America close to a wilderness with a retreating glacial landscape is immediately striking and opens up endless stories about our past as a region and nation, with glimpses into an uncertain future.

In 1998 with a surge of local support, the NPS acquired a significant portion of lands and buildings, including the iconic 14 story Mill Building, *within* the already designated (1986) Kennecott Mines National Historic Landmark (NHL). The expected cost to maintain such a historical feature – the remnant industrial mining middens and deposits contaminated the site – was one barrier to NPS acquisition. Additionally, when constructed, the numerous wooden buildings were built for a short-term venture, not long-term preservation. In sum, the site would need significant amounts of financial and staff resources to preserve and manage.

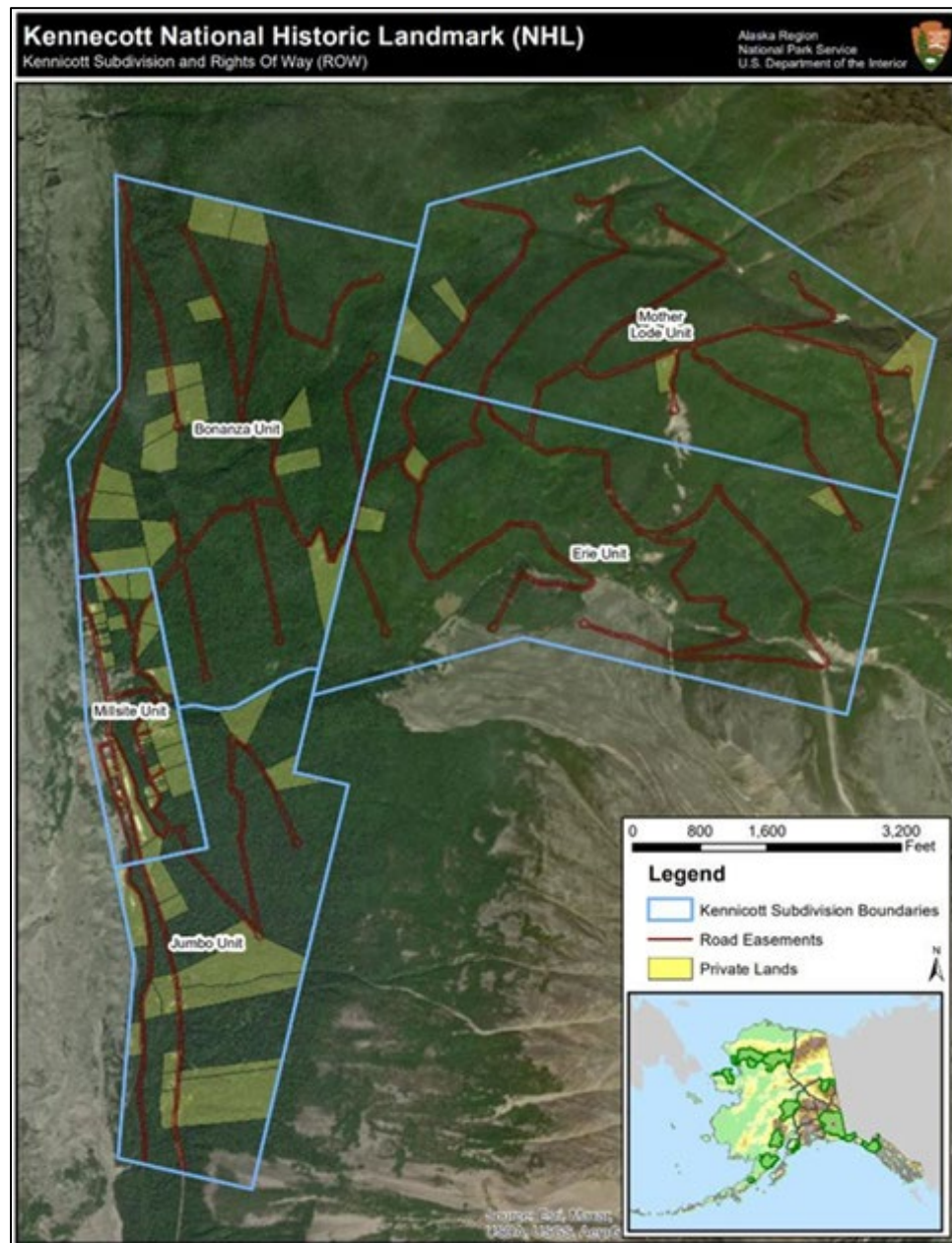
The NPS has managed portions of the site for over twenty-five years. There are many challenges to preserving and managing this site that are important to address transparently if the NPS is to preserve these public resources (and/or their memories) so generations may enjoy them.

The 2013 Kennecott Operations Plan (KOP) is one tool that the NPS used to managed and preserve Kennecott. The 2013 KOP had a broad geographical scope focused on NPS lands primarily within the NHL boundary and described management zones (derived from the 2001 Cultural Landscape Report (CLR)), management goals, concepts, and specific actions in the Kennecott Mines NHL with a focus on building stabilization. A component of the plan was for a review of the plan every five years. The NPS embarked upon the review beginning in 2018 and has engaged staff and the public multiple times since. Now, six years later (2024), this plan is being finalized.

Why did it take six years to complete this effort? The global pandemic was a large setback to public engagement and progress. However, the primary reason has to do with the complexity of the site and uncertainty about roles and responsibilities. Beginning in 2018, the NPS began to clearly articulate its current understanding of management guidance, roles, and responsibilities for the area, with the goal of spurring conversations with neighbors and stakeholders. This resulted in a review summary shared with landowners within the Kennicott Subdivision in 2023 (Appendix G).

An example of complexity is the park discovered that the accepted NHL boundary was incorrect, and that the actual boundary encompassed less acreage than previously thought. The NPS review affirmed and corrected the boundary, which is significantly smaller than had been represented in publications for several decades (Appendix G). There were other additional and important foundational misunderstandings that were addressed during this time. These include, but are not limited to: the NPS's legal authority to issue access permits to water for other local landowners within the Subdivisions; platted property lines compared to on-the-ground realities; the legal authorities associated with NPS-managed lots for the purposes of issuing commercial use authorizations (CUAs) or special use permits (SUPs); and, the appropriate role of the NPS in the management of a community-designated NHL site.

In short, it became apparent that the NPS roles and responsibilities have highly nuanced, or at times fundamentally different, scopes of authorities and responsibilities as a neighbor within the Subdivisions of the NHL than the rest of the 13.2-million-acre Wrangell-St. Elias National Park and Preserve (WRST, the park). As such, and to set a path forward for how to work within this unique management scenario for the NPS, this Kennecott Mines National Historic Landmark Management Strategy (strategic plan) was developed.



2 Map of The Kennicott Subdivision, Highlighting Land Ownership Type.

## 1.2 Document Guide

This subsection (1.2) outlines each of the sections and appendices, highlighting what has been retained from the 2013 KOP and what is suggested for revision.



Section 1 provides background, history, and context along with the strategic plan purpose. It also delineates how the strategic plan is placed within the larger planning and management context in the park.

Section 2 provides management goals and concepts adopted and revised from the 2013 KOP. A review/revision is also included, which highlights the reason for the revisions. The concepts and goals flow from broader to more focused.

Section 3 is a conclusion to the strategic plan.

Appendix A: “Potential Implementation Measures” was originally included in the draft plan that was released for public review in September 2023. It includes more targeted goals and potential implementation measures.

Appendix B: “Comment Response” is a comment response from the public comment period in 2023.

Appendix C: “Foundation Statement” provides excerpts of the 2010 WRST Foundation Statement, which serves to help orient the plan and provide touchstones for management direction.

Appendix D: “NPS Facilities, including Utilities and Infrastructure” was included from the 2013 KOP without edits or revision. It is included to provide relevant context to this strategic plan.

Appendix E: “Transportation, Access & Circulation” was included from the 2013 KOP without edits or revision. It is included to provide relevant context to this strategic plan.

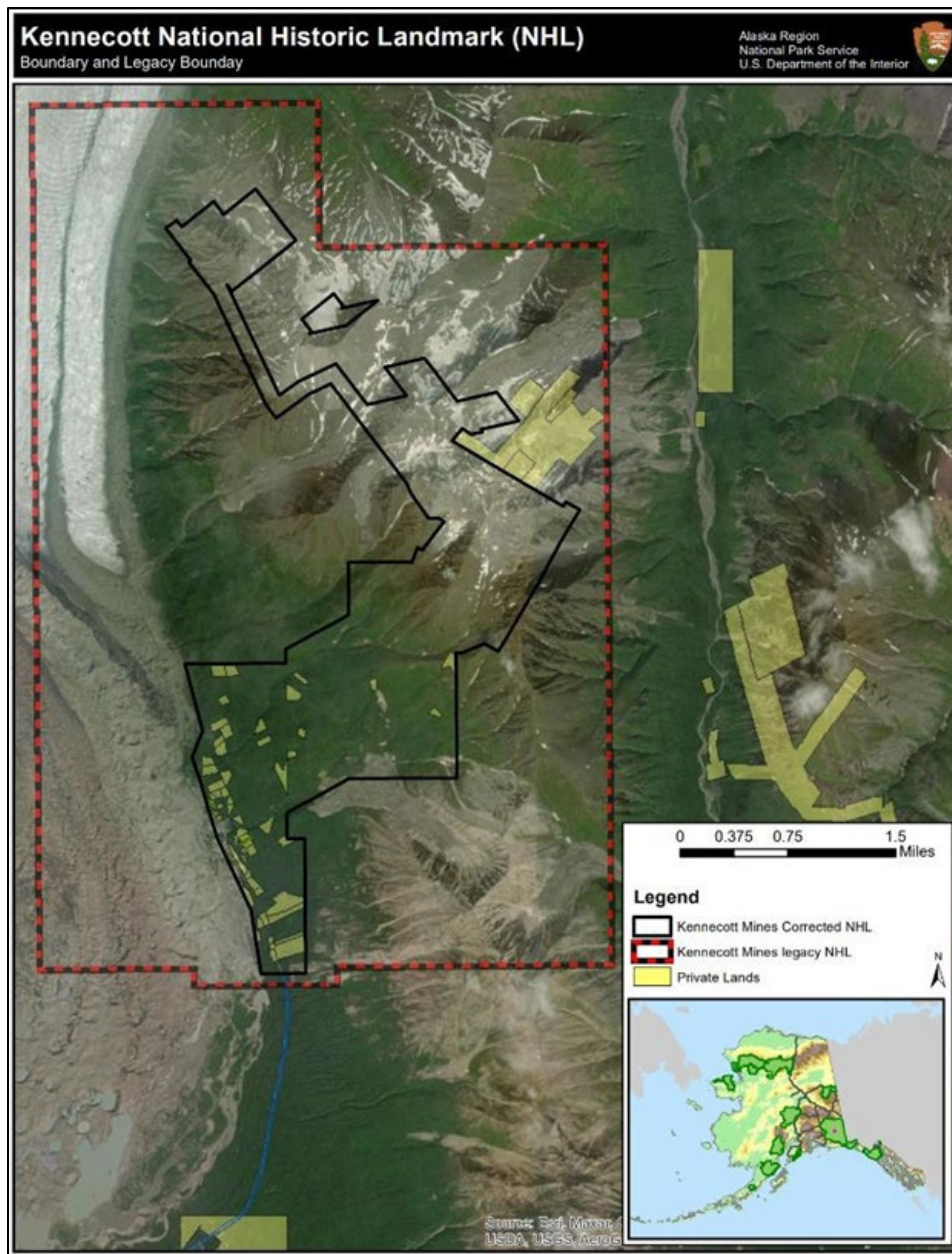
Appendix F: “Vegetation Management” was included from the 2013 KOP without edits or revision. It is included to provide relevant context to this strategic plan.

Appendix G: “Superintendent’s Letter” is a letter from the park superintendent that was released in May 2023. The letter marks the end of the review of the 2013 KOP and it was included without edits or revisions.

### ***1.3 Strategic Plan Purpose***

The purpose of the strategic plan is to:

- Re-align management of NPS-managed lands within the NHL to be consistent with the unique circumstances of working and living within a community-designated NHL.
- Re-align expectations of NPS operations to be commensurate with available staffing and funding.
- Reaffirm and update as needed the long-term goals, guidance, and management strategy for NPS-managed portions of the Kennicott Subdivision in the Kennecott Mines NHL. *This strategic plan does not apply to private landholdings within the community-designated NHL.*
- Identify strategic implementation planning needs.



3 Map of 1986 NHL Boundary (Black) Overlaid with the Previously Accepted NHL Boundary (Dashed).

## 1.4 Background

The lands contained within the Kennicott Subdivision (as depicted in Plat 77-1, records of the Chitina Recording District, Alaska) were designated as a National Historic District in 1978. They were then included within lands re-designated as an NHL in 1986. The lands of the National Historic District and lands of the NHL were both privately owned at one time, the majority by Consolidated Wrangell Mining Company (CWMC) and the associated Great Kennicott Land Company (GKLC). In 1998, NPS acquired CWMC and GKLC's remaining landholdings within the NHL that had not already been sold as small tracts to private parties, as well as the subsurface estate from the Kennecott Alaska Company. These landholdings totaled 2,835 acres and include much of the historic mill town, the subsurface rights to the mine, and the natural area surrounding a contemporary local community.

Friends of Kennicott (FoK) is a locally based non-profit organization, formed in 1988 by a diverse

partnership representing local landowners, tourism, mining, conservation, and historical preservation interests to conduct emergency stabilization of key structures. The 1998 NPS acquisition was initially facilitated by FoK. FoK, among others, successfully lobbied Congress for NPS acquisition of the Landmark, which succeeded with a federal appropriation to purchase the lands. In addition to the large role that FoK played in the NPS acquisition of portions of Kennecott, FoK played a large role in the intensive period of collaborative conversations with the community that established a long-term management vision, beginning with the 2001 Interim Operations Plan.

Currently, Kennecott Mines NHL is the most popular visitor destination in the park. With the acquisition, the NPS assumed new responsibility for protecting the important elements of the historical, cultural, and natural landscape. While the NPS owns the majority of the lots and the majority of the acreage within the NHL, the NPS is one owner among many. Additional management layers within the NHL in which all Subdivision landowners have an interest include covenants, architectural control bodies, and Subdivision easements.

### ***1.5 Physical Characteristics and Surrounding Lands***

The physical characteristics of and surrounding Kennecott have in the past, and continue to, impact management decisions. Kennecott is situated between the Kennicott Glacier and Bonanza Peak, leaving little flat ground for infrastructure, which was spatially organized around mining activities. The park contains some of North America's biggest and most rugged mountains and glaciers. Kennecott is approximately five miles north from McCarthy and lies at the heart of the park. There is one vehicle-accessible road that connects Kennecott to McCarthy, and one road (the McCarthy Road) that leads to McCarthy from outside the park.

The 2001 Cultural Landscape Report (CLR) summarizes the topographic constraints that historically and currently impact access. Like other mining operations, the physical character and cultural landscape of Kennecott were historically linked to the supply and processing of naturally occurring ore and available water. In addition, the functional relationships within the physical complex of the mill town were influenced by large-scale landforms that created natural constraints and opportunities for site development. Many of these large-scale landforms, such as the ridge, valley, and moraine, remain today and contribute to the historical significance of the cultural landscape.

These resources transcend boundaries as should communications and coordination for a community-based management approach.

#### **Surrounding Lands**

The NHL and the Kennicott Subdivision, which is inside the NHL, are a checkerboard of land ownership, with NPS, private, State of Alaska, University, and other land ownership. The NPS manages most of the area surrounding Kennecott, except for McCarthy. The NPS managed lands surrounding the NHL are managed similarly to the NHL with the exception that NPS work within NPS owned lands in the NHL may undergo a higher degree of analysis to limit impacts to the character of the NHL. All NPS areas within the park are managed under the General Management Plan (1986) with additional plans focusing on the Kennecott area discussed in the next section(s).

McCarthy is a neighbor to Kennecott and similarly has a checkerboard of ownership, with many private, State, and other lands. Connecting McCarthy to Kennecott, and beyond, are the transportation corridors that are integral for travel to and from Kennecott/McCarthy. The McCarthy to Kennecott segment of the McCarthy Road ends at the Kennicott Subdivision, marked by U.S. Mineral Survey 770. Landowners within the NHL share private roads for themselves and their guests, with an independent right to use the

Subdivision roads without a CUA. CUAs are required for certain private business operations where the NPS has jurisdiction and NPS regulations apply.

### ***1.6 Need for an Updated Plan(s)***

The 2013 KOP directed that “Once every five years, the park will initiate a review of the KOP, seeking full community input in advance of adopting any revisions to the current plan. These reviews will focus on any discrepancies between the plan and its implementation.”

A review of the 2013 KOP was completed in the summer of 2023 after public engagement in 2018, 2019, and 2022. The review concluded with a superintendent’s letter (Appendix G) and public meeting that outlined the status of each action. Many actions identified in the 2013 KOP have been completed, some are in process, and some have not yet been addressed, with the status of each action captured in the review.

With the completion of the review, there became the need to clarify what, if any, revisions should occur to the 2013 KOP. In summary, new issues have arisen since the 2013 KOP was completed, such as the deliberate need for treatment of contaminated sites throughout NPS-managed lands of the NHL. Through the first five-year review, it is determined that the 2013 KOP as written is difficult to revise within the framework of NPS policy as it contains a diverse set of expectations – from long-term management goals to short-term operational goals whose implementation are heavily influenced by annual appropriations. To effectively address emerging and persistent issues, the NPS will build upon the 2013 KOP through this strategic plan

Additionally, it was noted that there are recurring persistent issues that have yet to come to reasonable resolution after twenty-five years of effort. These issues require a more directed approach, such as a transportation-specific plan, and are not addressed in detail in this plan. Furthermore, there are broader topics than the 2013 KOP envisioned at the time, such as the need for more deliberate thought and consideration of commercial services, visitor experience, and transportation of many types. A draft document was released September of 2023 for public review and comment. Appendix A lists specific goals, sub-topics, and potential implementation measures informed by input from staff and the public to be carried forward in future planning.

### ***1.7 How this Document Differs from the 2013 KOP***

- *Geographic scope of NHL reduced*— The geographic scope of the 2013 KOP corresponded to NPS owned lands within the NHL boundary and varied locations well beyond the NHL boundary. After extensive research during the 2013 KOP review, it has been determined that the NHL boundary currently depicted in most NPS records, as well as public-facing documents, is not correct. The actual legal boundary is smaller and consistent with the NHL designation in 1986 (2,986 acres instead of 14,159 acres— an 11,173 acre or 79% reduction). The geographic scope of this strategic plan will specifically correspond to the updated boundary of the NHL (Appendix G). The scope does not apply to private landholdings within the Subdivision boundary, nor to NPS lands outside that boundary, but it does address the park's relationship with its neighbors in and beyond the borders of the NHL. Note that the geographic scope of the strategic plan may be amended with future public planning if individual or aggregate cultural sites are determined to add significant value to the designation of the NHL.
- *More static and foundational to future management*— This strategic plan is intended to have longevity (focusing on key areas to be addressed for the next 10-20 years), and not need to be reviewed and/or updated regularly. Goals and concepts are broad, comprehensive, and lasting.



- *Realignment of key concepts*— Key concepts in the 2013 KOP were realigned with current NPS policies.

## ***1.8 Kennecott Management Planning Portfolio***

It is important to provide context to the park’s planning efforts before delving into the strategic plan’s revisions.

NPS Director’s Order 2 Park Planning (DO 2) (2021) states that a park’s “planning portfolio is the assemblage of planning documents that guide park management and decision making and satisfy law and policy. A park’s planning portfolio, which extends from the foundation document to site-specific resource and visitor use management plans, creates a logical, trackable guide for future park management actions.”

A park’s “planning portfolio can be visualized as a loose-leaf binder, to which park planning elements, such as a foundation document, stand-alone General Management Plan (GMP), strategic plans, and implementation plans, may be added or updated so the portfolio remains current. By using the totality of documents within a park’s planning portfolio, park managers are able to fulfill all relevant legal and policy requirements, including GMP statutory requirements” (NPS 2021).

### **Existing Plans**

#### *2001 Interim Operations Plan*

The 2001 Interim Operations Plan was the first comprehensive plan to address NPS operations in Kennecott. The plan was intended to provide guidance for management of the NHL for a five-year period and was written to develop management strategies for the NPS when the NPS acquired portions of the Kennecott Mines NHL in June 1998. This document has since been replaced by the 2013 KOP (see description below).

#### *2001 Cultural Landscape Report (CLR)*

The 2001 CLR for the Kennecott mill town was divided into two parts. Part 1 included the Site History, Existing Conditions, and the Analysis and Evaluation of cultural landscape characteristics. Part 2 included treatment of the cultural landscape and recommendations, and a five-year management plan. The CLR's recommendations supported actions in the 2001 Interim Operations Plan, including associated design guidelines, and addressed the long-term stewardship of Kennecott.

#### *2006 Kennecott Support Facilities Plan (KSFP)*

The purpose of the 2006 KSFP was to support park operations and improve visitor services within the planning area by siting facilities both inside the NHL and along the last section of the McCarthy Road corridor. This included providing an efficient, cost-effective way to move supplies to the area for stabilization of historic structures, reliable transportation of visitors and park staff between the end of the McCarthy Road and the NHL, water and power utilities, facilities where visitors can obtain information and services, and NPS housing and administrative facilities.

#### *2013 Kennecott Operations Plan (KOP)*

Following the 2006 KSFP, and based on the 2001 Interim Operations Plan, the NPS developed a KOP in 2013. The 2013 KOP was developed because the 2001 Interim Operations plan was out of date and new direction was needed to address contemporary issues; there were major upcoming stabilizations projects; the NPS had acquired additional private parcels within the NHL boundary since 2001; and the Kennecott/McCarthy community expressed interest in updating the community vision presented in the 2001 Interim Operations Plan.

The 2013 KOP had a broad geographical scope focused on NPS lands primarily within the NHL

boundary. The 2013 KOP described management zones (derived from the 2001 CLR), management goals, concepts, and specific actions in the Kennecott Mines NHL with a focus on building stabilization.

## Planning Portfolio

Using input from the review process and from experience over the past ten years of implementing the KOP, this strategic plan sets forth goals for the next 10-20 years and reflects the need to address the long-term complexities of managing, working, and living in the NHL. To be consistent with the NPS DO 2, this strategic plan aligns the following within the park's planning portfolio as it relates to the NHL:

1. **General Management Plan** – Wrangell-St. Elias National Park & Preserve's GMP was completed in 1980. The 1998 acquisition of Kennecott Mines NHL was not envisioned in this document; however, this document provides the overall direction for the park and preserve for the park and the lands immediately surrounding the NHL.
2. **Foundation Statement** – Every park must have a foundation document—a formal concise statement of its core mission that provides basic guidance for planning and management decisions. Wrangell-St. Elias National Park and Preserve's 2010 Foundation Document (Appendix C) integrates the NPS-managed lands within the NHL and its cultural heritage as a significant and fundamental resource and value.
3. **Comprehensive Plan** – The 2013 KOP (and its predecessor, the 2001 Interim Operations Plan) may be considered a comprehensive plan under DO 2. Comprehensive plans provide overall direction and guidance on a variety of issues and topics in one document.
4. **Strategic Plan** – Strategic plans are designed to help NPS managers establish a clear direction for their park or program. This plan is a strategic plan that focuses upon the key areas that need to be addressed for the next 10-20 years, as staffing and funding allows, and is written to be broad, comprehensive, and lasting.
5. **Implementation Plans** – Through the review of the 'comprehensive plan,' the 'strategic plan' identifies four 'implementation plans' that will focus on how to implement an activity or project needed to achieve a long-term goal, address a management issue, or achieve a desired condition or goal. Implementation plans usually require a significant level of detail and analysis that goes well beyond what is appropriate for a comprehensive or strategic plan. In addition to the already established 2006 KSFP and the 2011 Kennecott Interpretive Plan, there are four implementation plans identified through the review and strategic plan processes, including:
  - a. A transportation plan,
  - b. A landscape interpretive plan,
  - c. A facility strategic investment plan,
  - d. A Comprehensive Environmental Response, and Liability Act (CERCLA) plan, and
  - e. Other additional implementation plans may be added in the future without changing this strategic plan (such as a commercial services plan or a visitor experience plan).

This strategic plan highlights the long-term durable portions of the 2013 KOP, thus no longer requiring a review of the KOP every five years. This strategic plan is designed to be long lasting and should not need to be revised regularly, although a periodic review should be conducted to ensure the strategic plan remains current and relevant. This strategic plan will inform future detailed implementation plans that outline implementation goals and clarify whenever feasible, the NPS legal authorities that exist (or do not exist) to support a goal, recognizing non-NPS authorities may also be available to contribute to a goal and that non-regulatory collaborative solutions may be possible or preferable.

It is important to note that the integration of plans into park operations (i.e., annual work) that determine relative priority (as reflected by importance and urgency) is largely an internal NPS work planning process that is driven by annual appropriations of Congress to the park. Annual appropriations determine the availability of staff and funding for this 13.2-million-acre park.

## Section 2: Strategic Management Goals and Concepts

The following management concepts and goals were developed in the 2013 KOP and in cooperation and consultation with the community of McCarthy/Kennecott. They are statements of purpose and condition for management of the NHL.

As conditions have changed, so have management concepts and goals. This section affirms the management concepts and goals from the 2013 KOP and provides revisions when necessary. Revisions were suggested during staff and public workshops in 2023.

Concepts are more broad, while goals are more focused and topic specific.

In this section, “*review*” refers to the status of the management goal or concept and the “*revision*” is the process of updating the strategic plan to reflect current and desired future conditions.

### 2.1 General Management Concepts

The 2001 Interim Operations Plan for the Kennecott NHL included a section titled **Management Concepts**. This section described elements of a shared community vision for management of the NHL. The Management Concepts were derived from two primary sources: 1) the set of documents that were produced at the time the NHL was established (including, but not limited to, the 1997 NPS report “Kennecott Acquisition Past, Present and Future,” which was developed in anticipation of NPS acquisition of lands within the existing NHL); and 2) the Alaska National Interest Lands Conservation Act (ANILCA) of 1980. These Management Concepts emerged from more than a decade of public discussion preceding the NPS acquisition of land inside the NHL boundary, were put into writing by the local non-profit Friends of Kennicott, and were endorsed by the community in general at the time of acquisition. In 2019 the Friends of Kennicott convened to review the management concepts and generally affirmed the existing management concepts, “recognizing they provide a useful framework for evaluating ongoing decisions about Kennecott.”

In all management activities, the McCarthy/Kennecott community seeks to assure a future in which Kennecott:

- Is stabilized to prevent deterioration of historic structures or artifacts and to make them available to the public, to the greatest extent possible in accordance with public safety.
- Is broadly managed at the landscape level where the long-term NPS presence reflects a “light touch” where actions are taken in small steps, at modest costs, with minimal intervention.
- Is not just an abandoned mining town, but also a place that reflects the vitality, creativity, and community spirit of today’s residents.
- Retains the slow pace, quiet, and spaciousness that foster contemplation and individual reflection. In particular, NPS will encourage visitors to enjoy the NHL as pedestrians, and will seek to minimize the impact of management activities (including, but not limited to, noise and visual impact) on both visitors and local residents alike.
- Is part of a larger community in which residents act both individually and collectively to guide the future of the area.
- Contributes to a strong, reasonably diverse economy that includes locally owned and operated businesses, community-based nonprofits, and traditions of barter and subsistence.
- Protects and honors small-town values: safety, cooperation, self-sufficiency, and personal freedoms consistent with state and Federal laws.
- Is a place where tourism is allowed to evolve within the capacity of the community, rather than a place where external intervention and control accelerate growth.

- Is seen by local residents and visitors alike in its true context: a remote outpost of civilization in the midst of an enormous mountain wilderness.
- Is managed to protect the cultural and natural resources of this historic mining district and the surrounding glacial landscape; and provides a safe, educational, and rewarding experience for the area's visitors and residents.

The NPS supports the management concepts that the community and organizations like FoK have articulated above and will generally integrate them with park management when practicable and as consistent with law and policy.

**REVIEW:** Consistent with the 2013 KOP, the NPS supports the management concepts that the community and FoK have articulated above.

**REVISION:** In the 2013 KOP, the NPS agreed as stated above “*with the exception of application of the second bullet statement to preservation of historic structures in Kennecott.*” The NPS will revisit this exception more deliberately and broadly due to fiscal realities and changing climate that have brought heavier snows repeatedly damaging buildings. This deliberate process will be an in-depth review of facilities, utilities, and infrastructure (Appendix D) through a focused Strategic Facility Investment Plan to prioritize limited resources to be sustainable within operational constraints.

**2.1.1 General Management Goal:** The general goal for management of NPS lands in and around the NHL is to conserve the scenery, natural and historic objects, and wildlife habitat and to provide for the enjoyment of the same by such means as will leave them unimpaired for the enjoyment of the future generations. The focus for management of NPS lands in and around the NHL is to stabilize, preserve, and interpret the remaining structures and features that define the historic, cultural, and natural character of the NHL. The NPS will recognize and work in partnership with the Kennecott/McCarthy community and other interested participants.

**REVIEW/REVISION:** The general management goal remains relevant and lasting. Minor changes were incorporated based on staff review and public comment.



## ***2.2 Transportation, Access, and Circulation***

**2.2.1 Transportation and Access:** As a partner in the community, NPS supports and will manage for long-term pedestrian visitor access to the mill town utilizing local shuttle systems. NPS will continue to support landowner use of subdivision easements and access to subsistence resources.

**2.2.2 Circulation Systems:** The majority of existing roads/trails reflect historic land use patterns and are contributing resources to the historic landscape. The historic circulation systems will continue to be maintained, when feasible. When preservation of circulation systems is not feasible, mitigation measures will be developed and implemented in accordance with applicable law, regulation, and policy (Appendix E).

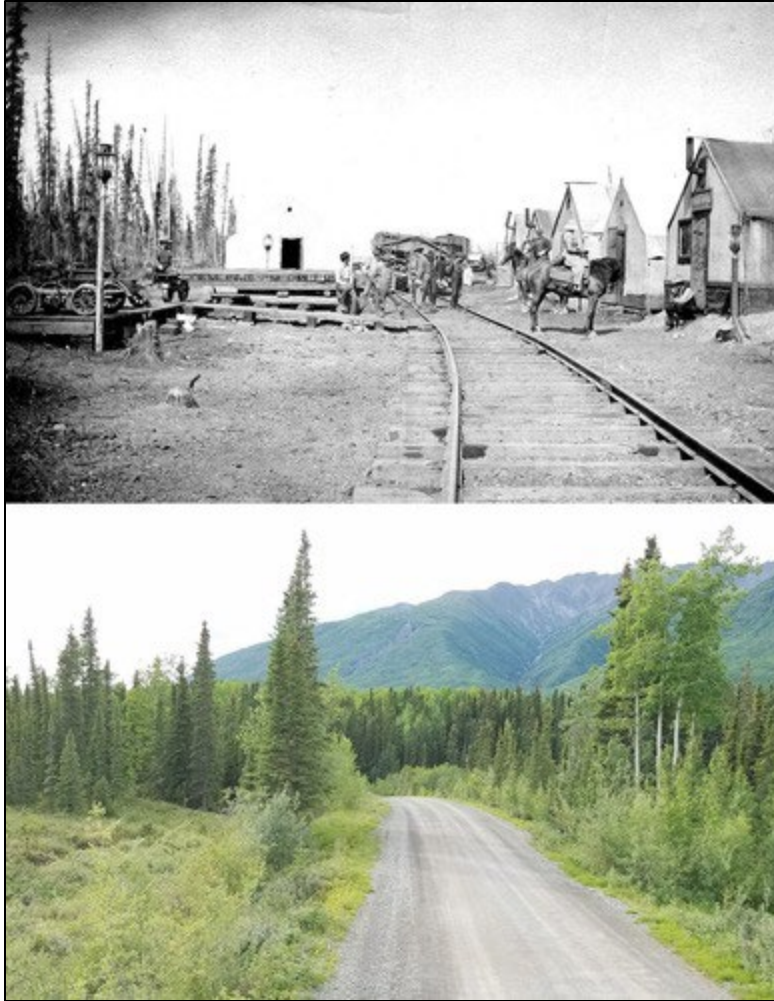
**REVIEW:** The NHL and the Kennicott Subdivision are a checkerboard of land ownership, with NPS, private, State of Alaska, University, and other land owners. The NPS manages most of the area immediately surrounding Kennecott. Connecting Kennecott to its neighboring community of McCarthy, and beyond, is the McCarthy Road. This road generally follows the former Copper River & Northwestern Railway bed and begins at the Copper River near Chitina and ends at the Kennicott Subdivision, marked by U.S. Mineral Survey 770. Landowners and their guests can use the private roads within the Kennicott Subdivision.

**REVISION:** The NPS will revisit the topics of transportation, access, and circulation within the NHL through a deliberate transportation planning process. This process will identify management actions to address varied issues of:

- parking by NPS staff, public visitors and subdivision residents and their guests on NPS-managed lands;
- modes of transportation (e.g., ATVs, bikes, e-bikes, horses, shuttles, etc.) by public visitors; and
- egress and transportation alternatives for emergencies.

Additionally, for the McCarthy Road corridor the NPS will pursue studies (e.g., the Planning Environmental Linkages [PEL] study) and plans to improve resource protection, visitor experience, and safety such as:

- revisiting the McCarthy Scenic Byway Plan as a foundation for discussions;
- evaluating geologic hazards (e.g., instability at Chitina/Kotsina floodplain, Crystalline Hills, and around mile 58);
- evaluating and resolving inferior culverts to support salmon;
- developing a foundation of understanding of the Right of Way (ROW) throughout the whole corridor;
- realigning the road within the ROW by the McCarthy swimming hole and the Gilahina (other locations as discovered);
- focusing on safety in all areas (e.g., Long Lake), and especially McCarthy to Kennecott Mines NHL boundary, for multimodal use (e.g., walking, bikes, shuttles, etc.);
- reviewing options for positive visitor experience (e.g., dust management, bike trails, etc.); and
- reviewing the appropriate roles and responsibilities, per ownership, for rest rooms beginning in Chitina and ending in McCarthy.



*4 Photo of The McCarthy Road, Past and Present, Past - Bleakley Collection / Present - Townsend.*

## 2.3 Interpretation

**2.3.1 Interpretation:** The interpretative programming at Kennecott will enable visitors to learn about the mines and the mill town, the historic relationship of Kennecott and McCarthy, natural resources, the surrounding wilderness, and the contemporary community through a variety of media, interpretive techniques, and programs, adopting modern interpretive concepts and practices as needed. The overarching and integral theme of ‘change,’ in relation to mining history and natural processes, will be highlighted. The Kennecott Glacier Interpretive Plan will provide a touchstone for interpretive activities.

**REVIEW:** This concept remains relevant and lasting. Minor changes were incorporated based on staff review and public comment.

**REVISION:** The park is an amazing landscape that is continually changing. The NPS will revisit this concept to see if it can be elaborated upon through a long-range interpretive plan for the entire park, that highlights the Kennecott area as a location within the park to view landscape changes vividly.



*5 Photo of A NPS Ranger and Visitors in Kennecott, NPS.*



## ***2.4 Natural & Cultural Resources Concepts***

**2.4.1 Vegetation:** Existing vegetation throughout the mill town is largely the result of growth since the historic period (1900 – 1938). Limited, selective thinning of vegetation will occur on NPS properties to preserve historic viewsheds and landscapes and protect sites from the effects of fire and damage to the buildings (Appendix F). Invasive vegetation will be controlled and removed as resources allow.

**2.4.2 Wildlife:** NPS will protect wildlife habitat and work to prevent negative wildlife/human interactions, while recognizing that wildlife is a resource for local subsistence use. The NPS will use non-lethal measures to discourage ‘problem’ wildlife before lethal measures are pursued.

**2.4.3 Water Resources:** On NPS lands, NPS will manage the quality of surface waters consistent with the Clean Water Act and other applicable legislation. Access to clean water for residents and visitors will be a high priority.

**2.4.4 Natural Soundscape:** Although historically the mine site was very loud, today the site is managed to respect the needs of the residential community. The NPS encourages staff, visitors, and residents to imagine the lively, bustling, and loud community that Kennecott once was, while respecting the current residents.



*6 Photo of National Creek, NPS/Townsend.*

**2.4.5 Subsistence:** The NPS will provide qualified local rural residents the continued opportunity to engage in subsistence uses, including hunting, trapping, fishing, and gathering, consistent with Titles II and VIII of ANILCA and associated NPS and Federal Subsistence Management Program regulations.

**2.4.6 Cultural Landscapes:** [new] Consistent with approved treatment recommendations in the most current version of the Cultural Landscape Report (NPS 2001), the NPS will identify and address preservation and treatment needs within the Kennecott Mill Town Cultural Landscape.

- **Structures:** The NPS will continue to monitor historic structures identified for adaptive re-use



and manage and maintain them in a manner consistent with the *Secretary of Interior's Standards for Treatment of Historic Properties*. Other historic buildings may be preserved or managed as ruins.

- **Archeological Features:** Archeological features and artifacts are contributing resources to the NHL and will continue to be managed in-situ. When in-situ preservation is not feasible, mitigation measures will be developed and implemented in accordance with applicable law, regulation, and policy. Mitigation strategies will be implemented based on approved management documents. When the preservation of cultural materials is not possible, sites will be extensively documented.
- **Archeological Resources:** Wherever feasible, all categories of archeological resources identified in the Cultural Landscape Report (NPS 2001) will be retained on the landscape. If removal is necessary for public safety or to facilitate building stabilization, archeological resources will be re-located as close to the original documented location as possible.
- **Small-Scale Features:** Small-scale features will be managed to preserve the character of the landscape and to enhance the interpretive environment. Examples of small-scale features include functional and ornamental elements (such as benches), utilities (light standards, utilidors, and water systems), and mining features (such as equipment). Priority for restoration will be to those features (such as hose houses or utilidors) that may serve some modern use.
- **Viewshed:** [new] All NPS developments will be considered in the context of historic properties, natural resources, and neighboring properties in the viewshed. When considering new developments, NPS would comply with applicable laws, regulation, and policy that guide management of the resources. For instance, within the Millsite Unit, all NPS developments would be subject to guidance from applicable covenants. Views of the expansive glacial landscapes will be highlighted, especially to showcase the ever-changing Kennicott Glacier.

**REVIEW:** These concepts remain relevant and lasting. Minor changes were incorporated based on staff review and public comment.

**REVISION:** Several proposed management goals were added to this section.

## 2.5 Facilities, Utilities, and Infrastructure

**2.5.1 Utilities and Infrastructure:** Where possible, systems will be designed consistent with historical utility systems and circulation patterns. Serious consideration will be given to use of alternative energy sources, provided they can be employed with minimal impact on the environment, the local community, and the historic landscapes. There will be safety and noise considerations during all construction activities for NPS employees, guests, landowners, and others.

**2.5.2 Structures:** The goal of the NPS Kennecott preservation program is to apply measures necessary to sustain the existing form, integrity, and materials of key historic buildings within the Kennecott NHL by repairing and replacing deteriorated roofs, walls, and foundations and, in some cases, by replacing and maintaining windows, siding, and paint to ensure preservation of historic structures for generations to come. Some historic structures have been specifically identified for adaptive re-use. These will be generally managed at a higher standard consistent with the “Rehabilitation” definition provided in *The Secretary of Interior’s Standards for Treatment of Historic Properties*. Other historic buildings may be preserved or managed as ruins. Hazardous substance mitigation (lead paint abatement) will be done concurrently with stabilization and rehabilitation of historic structures.

**REVIEW:** These concepts remain relevant and lasting. Minor changes were incorporated based on staff review and public comment.

**REVISION:** There is a need for an NPS-managed Historic Buildings and Strategic Facility Investment Planning to specifically reconcile preservation within the contexts of a changing financial situation (e.g., limited or declining staffing/funding) as well as a changing environmental climate (e.g., increase in frequency of heavy wet snow loads regularly causing damage to structures). Note that the geographic scope of the strategic plan may be amended with future public planning if individual or aggregate cultural sites are determined to add significant value to the designation of the NHL



7 Photo of The Kennecott Mill, NPS/Yarbrough.

## ***2.6 Commercial Services***

Commercial services were acknowledged in the 2013 KOP. In this strategic plan, the NPS commits to thoughtful support to local business that provide visitor services. Businesses fill a vital role with helping the NPS carry out its mission. Private companies work with the NPS to offer necessary and appropriate services to park visitors that parks do not provide directly. By welcoming the private sector as a partner in park operations, the NPS broadens the economic base of the region and the communities surrounding parks. Some of the commercial services management programs available to the NPS are concessions, CUAs, and leasing. As a business partner in the community, the NPS supports and will manage for long-term strategic business opportunities within and around the NHL.



*8 Photo of A Visitor Tour of the Mill Building Given by NPS Commercial Services Operator, NPS.*



## ***2.7 Hazardous Materials & Contaminants***

**2.7.1. Hazardous Materials:** Hazardous materials management, including heavy metals and those falling under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), will follow appropriate guidance on hazardous material issues work plans, the Collection Management Plan, and waste management plans, implementing mitigations when necessary. All hazardous materials plans will be made available to staff.

**REVIEW:** This concept remains relevant and lasting. Minor changes were incorporated based on staff review and public comment.

**REVISION:** Since 1999 the NPS has been working to improve safety at the Kennecott Millsite through architectural stabilization and lead paint mitigation. The NPS is in the process of CERCLA investigations. Human health and safety are a top priority and will be an important factor to direct management decisions and public use.

The 2013 KOP acknowledged there are hazards on lands and in buildings of the site. This strategic plan calls out a commitment to a safe environment through the CERCLA process. All contaminated sites located on lands under NPS jurisdiction go through four phases of cleanup with numerous documents and plans produced – site scoping, cleanup action selection, cleanup action implementation, and site monitoring. Each phase of cleanup has specific requirements and milestones based on CERCLA (or the applicable authority). At the Kennecott Mines and mill town site, cleanup phases and milestones are based on CERCLA and its implementing regulations documented in the National Contingency Plan (NCP). The NCP establishes the structure for responding to releases and threatened releases of hazardous substances. The NPS will support meaningful community involvement throughout the investigation, selection, and implementation of cleanup activities is an ongoing activity and requirement that reaches across all phases of the NPS Cleanup.



*9 Photo of Collecting Water Samples from National Creek During the Remedial Investigation in 2021, NPS.*



## ***2.8 Community and Partnership Goals***

**2.8.1 Partnerships:** The NPS will work in partnership with the Kennecott/McCarthy community to manage the NHL in such a way as to respect the character and goals of the local communities. The NPS recognizes that a viable and diverse community of individuals and families existed in the area prior to the creation of the NHL, indeed prior to the entire region being designated a national park. The NPS and the Kennecott/McCarthy community characterize the partnership as an active cooperation working to achieve mutual goals and objectives. The NPS will continue to work with other landowners as a fellow neighbor.

**2.8.2 Communications:** The NPS will continue to engage in frequent, on-going communication with the local Kennecott/McCarthy community, the Native Village of Chitina (of whose members traditionally and currently occupy the land in and around Kennecott), and other interested Alaska Native groups. The NPS recognizes that continued, direct involvement by community members is key. This long-term goal is in recognition of the irreplaceable value of local knowledge to the development and implementation of NPS policy, and acknowledging that tribes, residents, non-profit organizations, and businesses provide visitor services and contribute to the rich hospitality experienced by park visitors.

**REVIEW/REVISION:** These management concept remains relevant and lasting. Minor changes were incorporated based on staff review and public comment.

### **Section 3: Conclusion**

The ongoing community-based partnership has its roots from the beginning of NPS stewardship of Kennecott. The park is committed to working together with neighbors and other stakeholders, to establish a steady foundation of trust and commitment. The park, like other landowners, has values that are shared by the local community. Ultimately, the park is a public agency acting charged with acting in the best interest of the public and within policy and law. Four observations made during this review that may be meaningful to reflect upon as the NPS implements this strategic plan:

- The NPS authorities within the NHL are sometimes clear but more often nuanced as an artifact of being within a Subdivision of a platted residential area with private roads.
- The absence of a governance structure for the community of Kennecott limits the NPS's abilities to readily find durable, long-term, legal solutions to many issues of concern. Success is most often dependent upon our ability to work together as a community.
- Most residents of Kennecott do not live in the community year-round. Park staff work on complicated NHL issues intensively throughout the year. The NPS strives to meaningfully connect with landowners and residents each summer when most are physically present.
- The Kennecott community represents one among over twenty that rely upon collaboration with the small staff of the 13.2 million acre park. Scarce availability of staff and limited support are in constant tension among needs and emergencies across the entire area.

As the park continues to implement the priorities addressed in this strategic plan, focus on community will be paramount; awareness of our respective needs and wants a priority; and realistic expectations and patience among all parties, critical. The park has strong roots in community and twenty-five years of practice together in the NHL to suggest a bright future ahead!

## Appendix A: Potential Implementation Measures

This table lists specific sub-topics, goals, and potential implementation measures informed by input from park staff and the public to be carried forward in future planning. The National Park Service (NPS) values the public engagement and compiled a list of actions to be incorporated into future implementation plans and operational workplans. This list is derived from comments in internal and external meetings and document reviews from 2018, 2019, 2022, and 2023.

This Appendix provides examples of potential implementation measures that would be appropriate and in line with the management goals outlined in the previous section of the plan. Additional data gathering, planning, site-design, and compliance will be addressed through separate, tiered documents.

New issues have arisen since the 2013 Kennecott Operations Plan (KOP) was completed, as well as recurring issues that have not come to a final resolution. Three salient and pressing topics are: commercial services, visitor experience, and transportation. The strategic plan will not prescribe specific actions to address these issues. However, the following table lists specific sub-topics, goals, and potential implementation measures related to the main topics. The list of sub-topics and potential implementation measures can then be prioritized and used in future planning efforts specific to the relevant topic.

Three main considerations will inform all potential future NPS implementation measures:

1. Relative priority as reflected by importance and urgency.
2. What NPS legal authorities exist, or do not exist, to support a goal, recognizing non-NPS authorities may also be available to contribute to a goal and that non-regulatory collaborative solutions may be possible or preferable.
3. Available NPS staff resources and funding.

The park understands that private landowners and the visiting public may have different views and priorities, and the park will consult with other affected parties and the public when prioritizing topics, as applicable.

### Visitor Experience

Sub-Topic	Goals	Examples of Potential Implementation Measures for NPS Workplans
Amenities	<ul style="list-style-type: none"><li>• Provide visitor amenities in accordance with applicable law, regulation, and policy.</li><li>• Improve visitor safety and sanitation.</li></ul>	<ul style="list-style-type: none"><li>• Provide additional vault toilets and handwashing stations in high use areas.</li><li>• Provide potable water for visitors.</li><li>• Consider bathrooms with plumbing if warranted by growth and when feasible.</li></ul>

Visitor Services	<ul style="list-style-type: none"> <li>• Provide visitors opportunities to learn about the mines and the mill town; the dynamic history of rapid development, abandonment, and subsequent reawakening of the contemporary community; and the equally dynamic changes of the surrounding wilderness landscape.</li> <li>• Promote increased institutional and public understanding of the history of indigenous people in the area, specifically in the Kennicott Valley, Chitina River drainage, and the Copper Basin, in coordination with tribes.</li> <li>• Promote technology and management decisions that reduce noise and enrich opportunities for quiet reflection.</li> <li>• Minimize exterior interpretive intrusions (signage) in the Millsite. Emphasize self-discovery and encourage exploration.</li> <li>• Welcome continued use of the Recreation Hall for community events, interpretive programs, and educational purposes.</li> <li>• Consider future opportunities to adaptively reuse the west bunkhouse for educational opportunities if hazardous materials can be mitigated.</li> <li>• Balance the implementation of new technologies with the historic ambience of Kennecott.</li> </ul>	<ul style="list-style-type: none"> <li>• Provide a variety of media and interpretive programs, adopting modern interpretive concepts and including messages about safety practices, leave-no-trace practices, climate change, and the contemporary community.</li> <li>• Open historic buildings and exhibits during published opening hours.</li> <li>• Hire additional, and when possible, local staff to provide additional visitor services.</li> <li>• Train staff on communicating the challenges (i.e., road conditions, lack of potable water) and benefits of visiting the National Historic Landmark (NHL).</li> <li>• Provide signage and information west of McCarthy to assist with visits to Kennecott. Make that information available via the park's website, roadside signage, and messaging at the Copper Center and other park visitor contact stations.</li> <li>• Provide opportunities for temporary or permanent supplemental exhibits, including scientific and artistic events and installations, that increase visitor understanding of the unique attributes of the NHL and surrounding setting.</li> <li>• Work with academic and non-profit institutions to enhance and broaden the scope of available visitor information.</li> <li>• Continue Recreation Hall lease agreement with the Wrangell Mountains Center or other suitable entity to encourage community opportunities for education, art, science, entertainment, and growth.</li> <li>• Promote technology and management actions that reduce noise to allow for a quieter visitor experience, such as solar arrays.</li> </ul>
------------------	---	--

Sub-Topic	Goals	Examples of Potential Implementation Measures for NPS Workplans
		<ul style="list-style-type: none"> <li>• Continue to maintain the historic, visual ambiance of the Kennecott Millsite.</li> <li>• Provide training and educational opportunities for staff to learn about and from the indigenous people in the area.</li> </ul>
Emergency Services	<ul style="list-style-type: none"> <li>• Provide emergency response on NPS lands.</li> </ul>	<ul style="list-style-type: none"> <li>• When mutually beneficial, cooperate with other local emergency responders that provide emergency services for NPS visitors and others.</li> <li>• Participate as needed in development of local emergency response protocols to improve efficiency and safety for first responders, the general public, and park resources.</li> </ul>
Backcountry Information and Access	<ul style="list-style-type: none"> <li>• Provide access to the backcountry beyond the NHL.</li> <li>• Provide appropriate information to backcountry visitors to enhance their experience and minimize the need for search and rescue.</li> </ul>	<ul style="list-style-type: none"> <li>• Provide messaging (via in-person conversations with rangers, brochures, website information, etc.) that is educational, rewarding, and safety-informed.</li> <li>• Coordinate with guide services and outfitters to facilitate accuracy and uniformity of safety messaging (e.g., bear safety and river safety).</li> <li>• Maintain trails and routes into the backcountry that originate within the NHL.</li> <li>• Consider new or upgraded bridges at high-traffic stream crossings in and near the NHL to improve safety and reduce erosion.</li> </ul>

## Transportation

Sub-Topic	Goals	Examples of Potential Implementation Measures for NPS Workplans
NHL Historic Use Patterns	<ul style="list-style-type: none"> <li>• Allow existing roads/trails to reflect historic land use patterns that are contributing resources to the historic landscape.</li> <li>• Minimize the need for parking to avoid congestion and visual intrusion of the historic setting.</li> </ul>	<ul style="list-style-type: none"> <li>• Identify and share legal authority regarding transportation activities, such as clarification regarding easements and right of ways.</li> <li>• Maintain historic circulation systems. When preservation of circulation systems is not feasible, develop mitigation measures in accordance with applicable law, regulation, and policy.</li> </ul>
Modes of Transportation	<ul style="list-style-type: none"> <li>• Establish appropriate modes of transportation for NPS guests (e.g., hiking, horses, e-bikes, etc.) and their requirements within the NHL (e.g., speed limits, stopping or turnarounds, etc.) that are consistent with law and policy.</li> <li>• Encourage pedestrian and shuttle service access to Kennecott.</li> <li>• Appropriate roles of alternative transportation modes within the NHL will be evaluated in the transportation plan.</li> <li>• Minimize public parking in the NHL, consistent with legal authorities.</li> </ul>	<ul style="list-style-type: none"> <li>• No parking on NPS land, including underlying Kennecott easements. NPS will continue to follow 36 Code of Federal Regulations (CFR) § 4.12.</li> <li>• Support community initiatives to identify solutions for managing conflicts between different user groups, such as horse riders, All-Terrain Vehicles (ATVs), pedestrians, motor vehicles, and e-bikes.</li> <li>• Work with local organizations, government agencies, shuttle operators or other partners to seek funding to support and expand shuttle operations for staff and visitors.</li> <li>• Minimize NPS traffic in and out of the NHL using actions such as incentivizing park employee shuttles and carpooling.</li> <li>• Continue to post speed limits and associated traffic management infrastructure.</li> <li>• Support and participate in community initiatives to identify solutions for managing conflicts between different user groups.</li> <li>• To enhance visitor experience and safety, provide alternate or separated routes or trails for pedestrian use.</li> </ul>



<b>Sub-Topic</b>	<b>Goals</b>	<b>Examples of Potential Implementation Measures for NPS Workplans</b>
Access to the NHL	<ul style="list-style-type: none"> <li>• Ensure that there is reasonable access to the NPS lots within the NHL that is consistent with law and policy.</li> <li>• Promote pedestrian and non-motorized visitor access to and within the NHL.</li> <li>• Continue to recognize motorized and non-motorized use of existing roads/trails for landowner access and as provided for in the Alaska National Interest Lands Conservation Act (ANILCA) (e.g., for subsistence).</li> </ul>	<ul style="list-style-type: none"> <li>• Trails: Provide access to NHL areas using maintained pedestrian trails in accordance with applicable law, regulation, and policy.</li> <li>• Road: Conduct a McCarthy Road Planning and Environmental Linkage (PEL) &amp; Access Study with Department of Transportation to seek community input.</li> <li>• Recognize landowner rights to NHL easements, access to inholdings pursuant to section 1110(b) of ANILCA, and local rural resident access to subsistence resources.</li> <li>• Continue to research legal authorities regarding transportation activities, such as clarification regarding easements and right of ways.</li> <li>• Initiate an access and circulation plan for the NHL.</li> </ul>

#### **Commercial Services**

<b>Sub-Topic</b>	<b>Goals</b>	<b>Examples of Potential Implementation Measures for NPS Workplans</b>
Business Opportunities	<ul style="list-style-type: none"> <li>• Authorize commercial services within the Kennicott Subdivision on NPS-managed lands, based on NPS “necessary and appropriate” criteria (defined in NPS Management Policies, 2006), with an emphasis on preservation of historic landscapes and compatibility with the local community, and if applicable (e.g., within the Millsite Unit) in compliance with Architecture Control Committee (ACC) guidelines/covenants.</li> </ul>	<ul style="list-style-type: none"> <li>• Issue Commercial Use Authorizations (CUAs) for non-NPS provided services like guided hikes, and other privately managed visitor services in Kennecott.</li> </ul>
Business Opportunities	<ul style="list-style-type: none"> <li>• Explore additional opportunities for local businesses.</li> </ul>	<ul style="list-style-type: none"> <li>• Maintain leasing NPS buildings as an option.</li> </ul>

## General

Sub-Topic	Goals	Examples of Potential Implementation Measures for NPS Workplans
Resources	<ul style="list-style-type: none"> <li>For management of NPS lots/lands in the NHL, conserve the scenery, natural and historic objects, and wildlife habitat and to provide for the enjoyment of the same by such means as will leave them unimpaired for the enjoyment of the future generations.</li> </ul>	<ul style="list-style-type: none"> <li>As needed, conduct limited, selective thinning of vegetation on NPS properties to preserve historic viewsheds and landscapes and protect sites from the effects of fire and damage to the buildings. Invasive vegetation can be controlled and removed as resources allow.</li> <li>Protect wildlife habitat and prevent negative wildlife/human interactions. The NPS can use non-lethal measures to discourage ‘problem’ wildlife before lethal measures are pursued.</li> <li>Manage the quality of surface waters consistent with the Clean Water Act (CWA) and other applicable legislation.</li> </ul>
Cultural Landscape Management	<ul style="list-style-type: none"> <li>Stabilize, preserve, and interpret the remaining structures and features that define the historic, cultural, and natural character of the NHL.</li> </ul>	<ul style="list-style-type: none"> <li>Monitor historic structures identified for adaptive re-use and manage and maintain them in a manner consistent with the <i>Secretary of Interior’s Standards for Treatment of Historic Properties</i>. Preserve or manage other historic buildings as ruins.</li> <li>Consistent with the Cultural Landscape Report, identify and address preservation and treatment needs within the Kennecott Mill Town Cultural Landscape.</li> <li>Conduct condition assessments of the cultural landscape and maintain accurate and reliable condition information in existing databases, such as the Cultural Resource Inventory System (CRIS).</li> </ul>

Sub-Topic	Goals	Examples of Potential Implementation Measures for NPS Workplans
Partnerships	<ul style="list-style-type: none"> <li>• Work in partnership with the Kennecott/McCarthy community and other stakeholders to manage the NHL, respecting the character and goals of the local communities.</li> </ul>	<ul style="list-style-type: none"> <li>• Recognize that a viable and diverse community of individuals and families existed in the area prior to the creation of the NHL, indeed prior to the designation of the park.</li> <li>• Collaborate with partners to achieve mutual goals and objectives.</li> <li>• Work with other landowners as a fellow neighbor.</li> <li>• Use plan management goals to ensure that actions on NPS lands and actions that may impact NPS lands do not conflict with the shared vision of the NHL, Kennicott Subdivision, and the Millsite Unit.</li> </ul>
Hiring	<ul style="list-style-type: none"> <li>• Continue to utilize the Local Hire Authority.</li> </ul>	<ul style="list-style-type: none"> <li>• Look for opportunities to hire locally that comply with law and policy.</li> </ul>
Communication	<ul style="list-style-type: none"> <li>• Engage in frequent, on-going communication with the local Kennecott/McCarthy community, the Native Village of Chitina (of whose members traditionally and currently occupy the land in and around Kennecott), and other interested Alaska Native groups.</li> <li>• Share updates with stakeholders and the general public.</li> </ul>	<ul style="list-style-type: none"> <li>• Send yearly community newsletters to staff and community members that list upcoming and in-progress park activities.</li> <li>• Share news releases about upcoming and ongoing operations along with digital and in-person updates.</li> <li>• Continue direct involvement of community members because of the irreplaceable value of local knowledge to the development and implementation of NPS policy, and because tribes, residents, non-profit organizations, and businesses provide visitor services and contribute to the rich hospitality experienced by park visitors.</li> </ul>

<b>Sub-Topic</b>	<b>Goals</b>	<b>Examples of Potential Implementation Measures for NPS Workplans</b>
Alternative Energy	<ul style="list-style-type: none"> <li>• Serious consideration will be given to use of alternative energy sources, provided they can be employed with minimal impact on the environment, the local community, and the historic landscapes. The NPS has previously pursued actions to reduce adverse environmental impacts, such as the hybrid solar and propane electrical generation system at Kennecott and will continue to pursue solutions and management options that reduce adverse environmental impacts and increase environmental protections.</li> </ul>	<ul style="list-style-type: none"> <li>• Expand alternative energy options when practicable.</li> </ul>
Subsistence	<ul style="list-style-type: none"> <li>• Provide qualified local rural residents opportunities to engage in subsistence uses, including hunting, trapping, fishing, and gathering, consistent with Titles II and VIII of ANILCA and associated NPS and Federal Subsistence Management Program regulations.</li> </ul>	<ul style="list-style-type: none"> <li>• Take opportunities to send NPS staff to Kennecott/McCarthy to issue permits and provide information when possible.</li> </ul>
Contamination and Hazardous Materials	<ul style="list-style-type: none"> <li>• Reduce visitor, resident, and employee exposure to hazardous materials in this historic industrial ore processing site.</li> </ul>	<ul style="list-style-type: none"> <li>• Follow pertinent and up to date guidance in hazardous material issues work plans, the Collection Management Plan, and waste management plans, including those falling under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).</li> </ul>

## APPENDIX B: Public Comment Report and Analysis

### *Introduction*

The Draft Kennecott Operations and Management Plan (KOMP, plan) was released for public comment on the Planning, Environment, and Public Comment (PEPC) site on Friday, September 9, 2023. The KOMP was initially open for public comment until November 10. However, in response to public request, the comment period was extended to December 10.

16 commenters submitted comments, one of which was a form letter. The comments were coded into five categories: clarifying questions, legal authorities, miscellaneous, transportation, and suggested changes to the document. This totaled 109 discrete comments, though, when appropriate, some could be represented in multiple categories or combined, resulting in 70 comments responded to in this document. The National Park Service (NPS) endeavored to respond to every question or comment and make changes to the document when necessary. The NPS thanks those who provided comments.

### *Comment Categories*

Comment Category	Total	In this Document
Clarifying Questions	14	11
Legal Authorities	12	3
Miscellaneous	6	5
Transportation	29	9
Suggested Changes to the Document	48	42
<b>Total</b>	109	70

### **Clarifying Questions:**

1. A commenter asked what “personal freedoms consistent with state and Federal laws” means?

**Response:** This language is from a list of management concepts provided by Friends of Kennicott (FoK), first in the 2013 Kennecott Operations Plan (KOP), and retained in this strategic plan. Personal freedoms consistent with state and federal laws refers generally means that the NPS will not infringe on rights guaranteed through state and federal laws.

2. A commenter asked why aren’t all historic buildings that have been refurbished or stabilized open to visitors, noting the Power Plant, the bunkhouse along National Creek, the schoolhouse, and the cold storage building near the post office. The commenter suggested that if funds used to refurbish the buildings came from federal tax dollars, that there should be public access to the buildings (page 9 in the visitor services section).

**Response:** Per the 2013 KOP, buildings are first stabilized and then open when safe for the public and operational capacity allows.

3. Several commenters asked for a definition of a historic circulation system. Commenters additionally questioned what “allows existing roads/trails to reflect historic land use patterns” means.

**Response:** The Kennecott Mill Town Cultural Landscape Report (CLR) Part II has a section on historic circulation systems, which states in part, “The majority of existing circulation systems throughout the mill



town reflect historic patterns, and these should be maintained whenever possible. Contributing circulation systems include the (abandoned) railroad corridor. Silk Stocking Road, the loop road on the north side of the site, portions of the original wagon road extending northeast toward the mine sites, and the primary pedestrian trail across the east edge of the mill town.”

Section 2.2 of the strategic plan further addresses transportation, access, and circulation.

In many parks, the roads, parkways, and trails are significant historic circulation systems. A circulation system may constitute a cultural landscape in and of itself, such as Going-to-the-Sun Road in Glacier National Park, or it may be an integral feature of a cultural landscape. Key features of circulation systems, such as topography, bridges, headwalls, retaining walls, culverts, and views, are important to defining the overall character of the landscape. Retaining historic circulation features means that historically significant circulation systems and their associated features are not adversely impacted by making changes such as to accommodate recreational vehicles, buses, commuter traffic, or other contemporary uses.

4. A commenter asked how the NPS plans to establish appropriate modes of transportation. Additionally, how will the Kennecott community be involved in the process of identifying solutions to the transportation issue(s)?

**Response:** This topic will be addressed in more detail in a future transportation-specific plan, which the park is in the process of funding. The transportation plan will be focused on NPS visitors to this residential community. Through the planning process, the NPS will prioritize multiple opportunities for the public to be involved in the process of identifying solutions to the transportation issues in Kennecott.

Note that when the transportation plan is mentioned elsewhere in this document that the plan will be geared primarily but by no means exclusively towards accommodating NPS visitors.

5. A commenter described conflicting statements, asking if the community has asked the NPS to prohibit motorized traffic from their guests into Kennecott, why does the NPS continue to reference parking areas for their visitors? The commenter pointed to the draft plan, page 5 under bullet 4, *"Retains the slow pace, quiet, and spaciousness that foster contemplation and individual reflection. In particular, NPS will encourage visitors to enjoy the National Historic Landmark (NHL) as pedestrians, and will seek to minimize the impact of management activities, (including but not limited to, noise and visual impact) on both visitors and the local residents alike."*

**Response:** Commenters provided various perspectives on motorized travel by NPS visitors. Some commenters asked for public parking to be maintained while others asked for a prohibition on motorized traffic from NPS visitors. Consistent with the vision from FoK, the NPS will continue to encourage visitors to enjoy the NHL as pedestrians. The NPS does recognize private parking of vehicles on federal lands is a legacy from the transition of some lands from private to federal ownership and the NPS will consider options moving forward, such as Special Use Permits for private landowner parking on public lands. The proposed actions regarding parking in the 2013 KOP that have not been completed will be put on hold until a transportation plan is complete and may be reassessed considering the outcome of that planning effort. This topic will be addressed in more detail in a future transportation-specific plan.

6. A commenter asked how Alaska National Interest Lands Conservation Act (ANILCA) 1110(b) applies to federally owned and privately owned properties within Kennecott.

**Response:** Section 1110(b) of ANILCA requires the United States federal government to provide inholders (those with privately owned parcel of land within the boundaries of a park) rights necessary to ensure adequate and feasible access to their property. The term “adequate and feasible” is determined on a

case-by-case basis. As inholders within Wrangell-St. Elias National Park and Preserve (the park), private landowners in Kennecott fall under this provision.

According to “An Interim User’s Guide to Accessing Inholdings in National Park System Units in Alaska July 2007,” “Generally you do not need a RWCA if: 1) you will be using a motorboat, airplane (fixed-wing), snowmachine or a non-motorized means of travel to access your land; 2) this access does not require construction or maintenance of a facility on national park areas; and 3) there are no other park regulations otherwise restricting or controlling access to the area. Also, a RWCA is not necessary if there is a valid, existing right of way (such as a state highway) to your land, or if there is a designated park road or trail to your land that is open to use by the general public.

If the paragraph above does not describe your type of access, then you most likely will need a RWCA. RWCAs to inholdings are usually needed when operating motorized highway vehicles or ORVs on National Park System lands where no designated road or trail exists, or when construction or maintenance of a trail, road, powerline, or a landing strip occur on National Park System lands.”

7. A commenter noted that according to the Declaration of Restrictions (DOR), no lot shall be used except for residential purposes, unless otherwise approved by the Architecture Control Committee (ACC). The commenter suggested that all commercial services within the Kennecott Subdivision need to be in compliance with the ACC guidelines, not only, "if applicable," as stated on page 11 under Business Opportunities. The commenter asked the NPS to explain where the ACC would NOT be applicable with regards to a commercial service, noting that the DOR only applies to the Millsite Unit, so that may be what the NPS is referring to.

**Response:** A clarification providing an example of applicability (within the Millsite Unit) was added. See Appendix G, Frequently Asked Questions for further clarification on the relationship between the ACC, which is a community group, and the NPS, which is a participant in the ACC.

8. A commenter questioned if the NPS will plan to remove debris piles from demolished buildings included in the list of example actions for NPS work plans. The commenter questioned if this would include selective thinning of vegetation on NPS lands to preserve historic viewsheds and for fire prevention.

**Response:** The scope of this strategic plan is at the management level and does not address specific actions such as removing debris piles from specific lots. However, a potential implementation measure “*Limited, selective thinning of vegetation could occur on NPS properties to preserve historic viewsheds and landscapes and protect sites from the effects of fire and damage to the buildings*” is included in the strategic plan.

9. A commenter noted that the new parking proposed at the Dairy Barn would be at a lower elevation than the current handicap parking at the shuttle turn-around. The commenter asked how the NPS will maintain the handicap accessibility of the current spots adjacent to the shuttle turn-around.

**Response:** This comment is in response of Appendix A: a Superintendent’s Letter outlining the status of action items identified in the 2013 KOP. This action item was listed in the 2013 KOP. The status of that action item is that the Dairy Barn parking area is functional but not operational as designated for public parking. In keeping with the July 2022 News Release, on NPS lands in the NHL, parking is allowed only at the shuttle turnaround located next to the Kennecott Visitor Center. Parking on NPS lands elsewhere in the NHL is prohibited except for Federally qualified rural Alaska residents engaged in permitted subsistence activities. Resident and visitor parking will be addressed in more detail in a future transportation-specific plan.

10. A commenter asked for clarification on the statement, *“delineate legal authority regarding transportation activities, such as clarification regarding easements and rights of ways.”* The commenter asked if the NPS can restrict or prohibit its guests and visitors from using motorized vehicles within the NHL, and for the NPS to define the difference between an NPS guest and visitor.

**Response:** The terms “guest” and “visitor” have been used interchangeably, but NPS will in the future not refer to park visitors as “guests.” With certain exceptions, including but not limited to Subdivision lot owners and their guests, NPS is authorized under 36 CFR 13.1910 to prohibit motor vehicle use by NPS visitors within the NHL. This topic will be addressed in more detail in a future transportation-specific plan.

11. A number of questions were received regarding the goal in the plan (page 10) *“Establish appropriate modes of transportation for NPS guests (e.g., hiking, horses, e-bikes, etc.) and their requirements within the NHL (e.g., speed limits, stopping or turnarounds, etc.) that are consistent with law and policy”* Commenters asked who will enforce the stopping and turnaround points; where would horses and e-bikes be allowed; who would clean up after the horses; what is the current status and enforcement of e-bikes; where did the issue of horses appear from; and have horses been brought up to Kennecott residents.

**Response:** The goal *“Establish appropriate modes of transportation for NPS guests (e.g., hiking, horses, e-bikes, etc.) and their requirements within the NHL (e.g., speed limits, stopping or turnarounds, etc.) that are consistent with law and policy”* was removed and replaced with *“Appropriate roles of alternative transportation modes within the NHL will be evaluated in the transportation plan.”* This topic will be addressed in more detail in a future transportation-specific plan.

#### **Legal Authorities:**

1. A commenter stated that any trail improvements on existing easements should not impede the rights of individuals to use legally appropriate means of access.

**Response:** The NPS agrees that trail improvements on existing easements should not impede the rights of individuals to use legally appropriate means of access.

2. A commenter suggested the NPS should lead a discussion about ownership and rights of Kennecott easements and that this discussion should include the State of Alaska’s RS 2477 assertions and other access rights derived from ANILCA.

**Response:** The park values transparency in ownership and rights of this residential community. The park does not plan to lead a discussion focusing on easements, ownership, and other access issues at this time and will continue to clarify ownership and access on NPS-managed lands as issues arise.

3. A commenter asked why the NPS would want to acquire additional property in Kennecott. The commenter suggested that similar to Denali National Park, Wrangell-St. Elias National Park should consider a lot leasing program to provide competition in visitor accommodations and services.

**Response:** The NPS currently leases one building in Kennecott. The strategic plan identified commercial services as an area of interest for further discussion and planning and will consider this comment to inform those conversations.

#### **Miscellaneous:**

1. Several commenters asked for increased environmental protections in the final plan and for the NPS to consider how implementation of the plan would reduce adverse environmental impacts.

**Response:** The NPS added information to the strategic plan to address comments referring to the NPS's past sustainable solutions, such as installing a hybrid solar and propane power generation system, and the NPS's continued interest in pursuing solutions and management options that reduce adverse environmental impacts and increase environmental protections. See the sub-topic "Alternative Energy" under the "General" topic in Appendix A of the strategic plan.

2. A commenter stated that they support the Management Concept in the fourth bullet point on page 5 to retain a slow, quiet pace. The commenter stated that minimizing the noise impacts of guest and resident activities is equally as important as minimizing noise from management activities.

**Response:** The NHL is primarily a residential community to which the NPS does not have the authority to manage resident or guest activities on private lands. The NPS encourages visitors to experience Kennecott as pedestrians. The NPS has added a goal in the strategic plan to "*Promote technology and management decisions that reduce noise and enrich opportunities for quiet reflection,*" which would encourage NPS visitors to minimize noise. This topic will be addressed in more detail in a future transportation-specific plan.

3. A commenter requested that the NPS award concession contracts to local companies, cap the per person Historic Mill Tour fees at \$20.00 or less, and ensure the concessioner program content is held to a historically accurate standard. (From the Draft Plan, September 2023 on Page 11: "*The tours and other concession-provided services are managed concession contracts. These contracts are revisited during a prospectus on a ten-year cycle. Local companies may apply as appropriate during the prospectus process*").

**Response:** Concessions contracts are awarded through a competitive selection process to obtain the best service provider. Consistent with ANILCA (16 USC 3197 Section 1307, Paragraph (b)(2)), "The Secretary... shall give preference to persons whom he determines, by rule, are local residents."

All rates and charges to the public by the Concessioner for visitor services must be comparable with similar services provided by the private sector. 36 CFR § 51.82(c) requires the NPS to use the competitive market declaration (CMD) rate approval method and the existence of even one competitor can indicate a competitive market exists.

Concession contracts require the concessioner to provide all visitor services in a manner that is consistent with and supportive of the interpretive themes, goals, and objectives articulated in each park's planning documents, missions statement, and/or interpretative prospectus

4. A commenter stated that routine and adequate cleaning and maintenance of public outhouses positively enhances the visitor experience. The commenter felt that regular servicing and maintenance of NPS built outhouses should be a budget priority (page 8 visitor experience, provide visitor amenities and provide bathrooms and handwashing stations).

**Response:** The NPS agrees that adequately cleaned and maintained public outhouses positively enhance the public experience. The NPS has added a goal to "*improve visitor safety and sanitation.*" Associated potential implementation measures include 1) *provide additional vault toilets and handwashing stations in high use areas* 2) *provide potable water for visitors* and 3) *consider bathrooms with plumbing if warranted by growth, all of which could improve the visitor experience.*

5. A commenter noted that the State of Alaska has interest in submerged lands adjacent to the project area, including but not limited to, the East Fork Kennicott River.

**Response:** The East Fork of the Kennicott River is outside of the geographic scope of this strategic plan. A navigability determination has not been completed so ownership of the submerged lands underlying the river is unresolved. Nonetheless, the NPS will continue to work cooperatively with the State of Alaska to ensure visitor safety and protection of resources.

**Transportation:**

1. A commenter asked that the NPS continued to provide public parking in the NHL.

**Response:** See question five under clarifying questions for a response.

2. A commenter stated that in January 2021 over 45 residents signed and sent a petition to the NPS asking the NPS to prohibit All-Terrain Vehicle (ATV)/ Off-Road Vehicle (ORV) traffic for residents' guests. The commenter asked if the NPS will manage visitors' modes of transportation.

**Response:** NPS management of visitors' modes of transportation will be addressed in more detail in a future transportation-specific plan.

3. A commenter felt that preserve roads, currently only open to rural residents, should be open to other Alaskans operating highway vehicles and Off-Highway Vehicle (OHV)s. They stated that the road surfaces to the Toe of Kennecott Glacier Road and the Wagon Road are durable and the increase in user numbers will likely be minimal. The commenter suggested that the NPS could authorize general ORV use by Alaskans on roads, parking areas, designated routes/areas, or under a permit.

**Response:** ORV use in the planning area will be addressed in more detail in a future transportation-specific plan.

4. A commenter encouraged natural sounds and natural quiet. The commenter asked the NPS to encourage pedestrian and other non-motorized modes of transportation in the NHL and prohibit recreational motorized vehicle use.

**Response:** Consistent with the 2013 KOP that encouraged pedestrian use, this strategic plan encourages pedestrian use. This topic will be addressed in more detail in a future transportation-specific plan.

5. A commenter suggested that placing current management solutions in the optional category or remaining silent implies they can be discarded. The commenter felt that there is a need to retain management measures that are working. The commenter provided an example of retaining speed limits.

**Response:** Although management measures may currently be working and will continue to be implemented, it is appropriate to keep the existing management actions in the "management examples" category. This is because they may change in the future, especially when a transportation plan is implemented.

6. A commenter suggested the NPS should consider extending the Planning and Environmental Linkages (PEL) study to include transportation to and through Kennecott.

**Response:** At this time, the PEL Study area is outside of the geographic scope of the strategic plan. The roads in Kennecott are private roads within Subdivisions of a residential community. The PEL addresses



the road managed by the Alaska Department of Transportation (DOT). Much (though not all) of this road is in an easement across park lands and may benefit from Federal Highway Administration planning. The PEL is a collaborative project that addresses transportation from Chitina to the NHL boundary - where the private road begins. The NPS is in the process of applying for funding for a Kennecott-specific transportation planning effort to focus on transportation issues for NPS visitors on roads within the NHL.

7. A commenter suggested there should be a multi-modal approach including access by vehicles, ATVs, and foot traffic. The commenter felt that there is adequate room to separate vehicle traffic from foot traffic, especially for the roads to Bonanza and Jumbo, and also suggested that there should be pedestrian-specific hiking trails. The commenter suggested that there should be an appropriate vehicle turnaround in Kennecott and reasonable vehicle parking in the Millsite.

**Response:** The vehicle parking issue is addressed in the NPS response to question number five in the clarifying questions section. The topic of multi-modal access will be addressed in more detail in a future transportation-specific plan.

8. A commenter stated that additional vehicle and ATV traffic results in increased puddles, dust, and noise, and detracts from the “slow pace, quiet, and spaciousness,” particularly for those encouraged to experience the NHL in a pedestrian capacity.

**Response:** Highway vehicles and ATVs can increase noise, dust, and puddles. Landowners with inholdings have the right to adequate and feasible access to their properties under Section 1110(b) of ANILCA. This may include access using highway vehicles and ATVs. The NPS will encourage pedestrian use when feasible. This topic will be addressed in more detail in a future transportation-specific plan.

9. A commenter stated that ORV access can be authorized under 43 CFR 36.11(g) and suggested that only a limited number of visitors would utilize ORVs to access the Millsite Unit parking lot. The commenter felt that Preserve roads, currently only open to rural residents, should be open to other Alaskans using ORVs. The commenter felt that the NPS could authorize general ORV use by Alaskans or under a general permit. The commenter additionally felt that designated parking would benefit the NPS as the alternative would be for visitors to park ORVs on the Omnibus Road right of way, which could present safety issues. The commenter suggested that future NPS transportation plans should incorporate ORV access.

**Response:** ORV use is one of many modes of transportation to be addressed in more detail in a future transportation-specific plan.

#### **Suggested Changes:**

1. A commenter requested that the NPS include detailed maps in any future planning process clearly showing land ownership.

**Response:** The NPS included a map in the updated version of the strategic plan that delineates land ownership. There are also several maps in Appendix G of the strategic plan that show land ownership and ROWs.

2. A commenter requested the NPS list their authority and jurisdiction to issue commercial use authorizations within transportation corridors. One road the commenter identified in the 2013 KOP as the “Alaska State [Right of Way], McCarthy to Kennecott,” and the commenter stated that this recognition should be carried forward in the plan.

**Response:** The McCarthy to Kennecott segment of the McCarthy Road ends at the Kennicott Subdivision, marked by U.S. Mineral Survey 770. The Alaska DOT has agreed with that legal assessment on multiple occasions. The statement in the 2013 KOP did not describe the location of the “McCarthy to Kennecott” road and lists other roads that are not located in the Subdivision, including the Toe of the Kennicott Glacier Road. Commercial Use Authorizations (CUAs) are required where NPS has jurisdiction and NPS regulations apply. NPS Management Policy 10.3.3 states, “CUAs may be issued pursuant to section 418 of the NPS Concessions Management Improvement Act of 1998 16 USC 5966). By law, CUAs may be issued only for the incidental use of resources of the unit by commercial operations that provide services originating and terminating outside of the boundaries of the park unit.” NPS CUA regulations do apply to non-public (private) roads in which NPS has a property interest, including the Subdivision roads. Landowners and their guests have a right to use the Subdivision roads without a CUA.

3. A commenter asked for a map or other verification to show that the shuttle turnaround is not within the transportation corridor ROW.

**Response:** The map requested in question 1 of the suggested changes section shows the landownership of the shuttle turnaround. There are also several maps in Appendix G of the strategic plan that show land ownership and ROWs. It is also worth noting that much (though not all) of the road is built in an easement across park lands.

4. A commenter requested that the NPS update the plan to carry forward the 2013 recognition of the State ownership of the McCarthy to Kennecott ROW.

**Response:** The McCarthy to Kennecott segment of the McCarthy Road ends at the Kennicott Subdivision, marked by U.S. Mineral Survey 770. Multiple statements by the Alaska Department of Transportation concur with that legal assessment. The statement in the 2013 KOP did not describe the location of the “McCarthy to Kennecott” road and lists other roads that are not located in the Subdivision, including the Toe of the Kennicott Glacier Road. The statement in the 2013 KOP was in no way asserting that the McCarthy Road right-of-way continued into the Kennicott Subdivision; it ends at the Subdivision boundary.

5. A commenter stated that the NPS should acknowledge existing, state managed, public transportation corridors, including state-managed RS 2477 rights-of-way, within the geographic scope of the plan. The commenter stated that there are State of Alaska interests in trails/easements including but not limited to the Wagon Road.

**Response:** The NPS recognizes that the State of Alaska claims certain routes as RS 2477s. The NPS cannot recognize the RS 2477s as existing until they are properly adjudicated, but it can note legally asserted claims by the State of Alaska if the State provides a list of routes claimed and under what authority. NPS notes that the Wagon Road is not included in the Statewide RS 2477 database as a claimed RS 2477.

6. A commenter suggested adding a statement similar to the following in the Visitor Experience table, *“Unnecessary noises will be eliminated in order to allow the visitor, to the greatest extent possible, to experience natural quiet and hear and enjoy natural sounds.”*

**Response:** A goal, *“promote technology and management decisions that reduce noise and enrich opportunities for quiet reflection,”* was added to Appendix A, which the NPS feels captures the spirit of this comment.

7. A commenter suggested the NPS should encourage pedestrian and other non-motorized modes of transportation in the NHL and prohibit recreational motorized vehicle use.

**Response:** See comment 5 under clarifying questions for a response.

8. A commenter noted that new interpretive exhibits were installed in the Leaching Plant sacking shed in 2018, many of which contained accessibility features as required by the Architectural Barriers Act, however the building has yet to be made accessible to visitors and staff with mobility issues. The commenter suggested that there is an easy and unobtrusive way to construct a complying ramp utilizing the machine shop south deck, and that this work should be incorporated into the plan, funded, and constructed.

**Response:** Plans and drawings for the Americans with Disabilities Act (ADA) compliant ramp are complete. Funding must be secured.

9. A commenter stated that the plan should acknowledge that interpretive media were added to the Shuttle Bus turnaround, General Manager's Office, Depot, Refrigeration Plant, Depot, Recreation Hall, and to a former residential cottage.

**Response:** This suggestion is outside the scope of the strategic plan. All of these locations were identified in the 2011 Interpretive Concept Plan as requiring new, updated, or additional interpretive media.

10. The opening bullet point under Plan Purpose states *"Identify management goals for visitor experience, commercial services, and transportation in Kennecott."* A commenter suggested that the term "Identify" implies starting from scratch, and given the long and consistent history of visioning for Kennecott, the commenter recommends an alternative phrase such as *"Reaffirm and update as needed the goals..."*

**Response:** This change has been incorporated.

11. A commenter stated that the plan's use of the term *"action"* items is confusing because the commenter suggests the plan intentionally avoids committing to specific actions. A commenter recommends alternative terminology that better reflects the purpose, such as *"potential implementation measures."* The commenter suggested that it would also be helpful to offer a wider range of options that provide flexibility while still serving the stated goals. Without prematurely committing to a specific action, the commenter suggested that providing more examples of management options will help guide future park managers.

**Response:** This change has been incorporated in Appendix A.

12. Under "Need for the 2023 KOMP" on page 4, the last paragraph explains the plan *"does not apply to private landholdings within the Subdivision boundary, nor to NPS lands outside that boundary."* A commenter recommends extending this sentence to include *"but it does address the park's relationship with its non-Park neighbors in and beyond the borders of the NHL."* The commenter suggested that this clarification recognizes the problem-solving value of communication and engagement that does not come from a place of control. The commenter also acknowledges that activities on private lands can affect public objectives and goals, and vice-versa.

**Response:** This change has been incorporated.

13. A commenter suggested that the NPS expand the Background section to include additional history and context about the Congressional direction to acquire the privately-owned mining-era property with an emphasis on partnerships, and the intensive period of collaborative community conversations following acquisition that established a long-term management vision.

**Response:** This change has been incorporated.

14. A commenter suggested to add a section briefly describing the physical characteristics of the site that influence management decisions, including topographic constraints affecting access and mining legacy heavy metal toxins potentially affecting public use. The commenter suggested that these facts are necessary for understanding issues discussed in the plan.

**Response:** This change has been incorporated.

15. A commenter suggested to add a section briefly describing the relationship of the site with McCarthy-area non-federal lands and transportation corridors, and with surrounding parklands, recognizing the importance of coordinating with other planning and management on issues not limited to NHL boundaries.

**Response:** This change has been incorporated.

16. Several commenters recommended retaining the plan's geographic scope to the entire Landmark (recognizing the size is much smaller than once thought), not just the Kennicott Subdivision. One suggested the entire Kennicott Valley, stating that key visitor destinations within the landmark, including Jumbo and Bonanza cirques, are outside the subdivision. The commenters felt that planning for those areas is integral to planning within the subdivision. The commenters suggested that an important component of managing what is happening inside the Millsite and other units is the access past the subdivision boundary into the other areas of the NHL and WRST Park and Preserve lands.

**Response:** The change to extend the geographic scope to the updated boundary of the NHL was incorporated.

17. A commenter requested increased emphasis on the value and importance of the Management Concepts and Communications on pages 5-6 to build upon the foundation of these values shared among diverse local interests and the park. For example, a commenter recommended adding a statement at the end of the introductory paragraph on page 5: *"But the park, like other landowners, has its own intrinsic interests and values that are clearly part of the mix, many of which are shared by the local community."*

**Response:** A similar change was incorporated in Section 3 that the park feels captures the spirit of the comment.

18. Consistent with the general comment about the challenge of navigating the realities of limited jurisdiction, funding and staff resources, a commenter recommended revising and expanding the last three sentences in the main paragraph on page 8 about management considerations. For example: *"Three main considerations will inform all potential future NPS implementation measures:*
- 1. Relative priority as reflected by importance and urgency.*
  - 2. What NPS legal authorities exist, or do not exist, to support a goal, recognizing non-NPS authorities may also be available to contribute to a goal and that non-regulatory collaborative solutions may be possible or preferable*
  - 3. Available staff resources and funding.*

*The park understands that private landowners and the public may have different views and priorities, and the park will consult with other affected parties and the public when prioritizing topics, as applicable."*

**Response:** This change was incorporated in Appendix A with minor modifications.

19. Consistent with the commenter's general comment about specifying goals beyond adherence to applicable law, regulation, and policy, a commenter recommended the following sample revisions:
- "Page 10, 8, Visitor Experience, Amenities. Replace "Provide visitor amenities in accordance with applicable law, regulation, and policy" with a Goal suggested by the sample action, such as "Improve visitor safety and sanitation." Potential implementation measures could include:*
- Provide additional vault toilets and handwashing stations in high use areas.*
  - Provide potable water for visitors.*
  - Consider bathrooms with plumbing if warranted by growth."*

**Response:** This change was incorporated in Appendix A with minor modifications.

20. A commenter suggested replacing *"Ensure any parking on NPS lands consistent with legal authorities"* in the right-hand column with a Goal *"Minimize public parking in the NHL"* accompanied by an implementation measure such as *"No parking on NPS land, including underlying Kennecott easements, NPS will continue to follow 36 CFR 4.12"* (Page 10, Modes of Transportation).

**Response:** This change was incorporated in Appendix A with minor modifications.

21. Consistent with the commenter's general recommendation to develop more meaningful Goals with expanded options for implementation measures, a commenter offered the following examples:
- Page 9, Visitor Services. "Emergency Response: provide support for emergency services for guests on NPS lots and lands." This is currently in right-hand column but the commenter suggested this is not optional so would be more appropriate as a simple Goal, such as *"Provide emergency response on NPS lands"* accompanied by potential implementation measures, such as:
- "- When mutually beneficial, cooperate with other local emergency responders that provide emergency services for NPS visitors and others.*
  - Participate as needed in development of local emergency response protocols to improve efficiency and safe."*

**Response:** This change was incorporated in Appendix A with minor modifications.

22. A commenter suggested that the stated Goal *"Allow existing roads/trails to reflect historic land use patterns that are contributing resources to the historic landscape"* is difficult to understand or interpret, and the implementation measures fall back on "applicable law, regulation, and policy." The commenter recommended more meaningful Goals and potential implementation measures that are consistent with prevailing shared values. The commenter acknowledged that access issues in the Landmark are challenging, and solutions are difficult, but felt they should not be swept under the rug. The commenter provided the below examples as value-based yet provide sufficient flexibility to future managers as issues and opportunities arise. The commenter also suggested consideration of combining the categories for Historic Use Patterns and NHL Access and Circulation, although these suggested examples focus mostly on the former.

*"Goals (new and revised)*

- Continue to recognize motorized and non-motorized use of existing roads/trails for landowner access and as provided for in ANILCA (e.g., for subsistence)*
- Promote pedestrian and non-motorized visitor access to and within the NHL.*
- Minimize the need for parking to avoid congestion and visual intrusion of the historic setting.*

*Potential implementation measures (new and revised)*

- Continue to research legal authorities regarding transportation activities, such as clarification regarding easements and right of ways.
- Initiate a step-down Access and Circulation plan for the NHL.
- To enhance visitor experience and safety, provide alternate or separated routes or trails for pedestrian."

**Response:** These changes were incorporated in Appendix A with minor modifications.

23. A commenter suggested revisions and expansions under visitor services goals:

- "- Provide visitors opportunities to learn about the mines and the mill town; the dynamic history of rapid development, abandonment, and subsequent reawakening of the contemporary community; and the equally dynamic changes of the surrounding wilderness landscape.*
- Promote increased institutional and public understanding of the history of indigenous people in the area.*
- Promote technology and management decisions that reduce noise and enrich opportunities for quiet reflection.*
- Minimize exterior interpretive intrusions (signage) in the Millsite. Emphasize self-discovery and encourage exploration.*
- Promote continued use of the Recreation Hall for community events, interpretive programs, and educational purposes.*
- Consider future opportunities to adaptively reuse the west bunkhouse for educational opportunities if hazardous materials can be mitigated."*

**Response:** These changes were incorporated in Appendix A with minor modifications.

24. A commenter suggested revisions and expansions under visitor services:

- "- Provide opportunities for temporary or permanent supplemental exhibits, including scientific and artistic events and installations, that increase visitor understanding of the unique attributes of the NHL and surrounding setting.*
- Work with academic and non-profit institutions to enhance and broaden the scope of available visitor information.*
- Continue Recreation Hall lease agreement with the Wrangell Mountains Center or other suitable entity."*

**Response:** These changes were incorporated in Appendix A.

25. A commenter suggested revisions and expansions under backcountry information and access goals:

- Revise first Goal to "Provide access to the backcountry beyond the NHL" to cover the entire Landmark, not just the subdivision.*
- Add an additional Goal: "Provide appropriate information to backcountry visitors to enhance their experience and minimize the need for search and rescue."*

**Response:** These changes were incorporated in Appendix A.

26. A commenter suggested revisions and expansions under backcountry information and access implementation measures:

- "- Provide messaging (signs, brochures, website information, etc.) that is educational, rewarding, and safety-informed.*
- Coordinate with guide services and outfitters to facilitate uniformity of safety messaging, e.g., bear safety.*



- *Maintain trails and routes into the backcountry that originate within the NHL*
- *Consider new or upgraded bridges at high-traffic stream crossings in and near the NHL for safety and erosion control.*”

**Response:** These suggestions were incorporated in Appendix A with minor modifications.

27. A commenter suggested replacements under modes of transportation goals:

- “- *Encourage shuttle service access to Kennecott.*
- *Minimize public parking in the NHL.*
- *Evaluate appropriate roles of alternative transportation modes within the NHL.*”

**Response:** These changes were incorporated in Appendix A.

28. A commenter suggested replacements under modes of transportation implementation measures:

- “- *Work with local organizations, government agencies, shuttle operators or other partners to seek funding to support and expand shuttle operations.*
- *NPS will continue to implement speed limits.*
- *Revise the last item in this column: ‘Support and participate in community initiatives to identify solutions for managing conflicts between different user groups.’”*

**Response:** These changes were incorporated in Appendix A.

29. A commenter recommended consistently referring to park "visitors" instead of occasionally as "guests" to avoid confusion or implication these are different constituents.

**Response:** This change was incorporated.

30. A commenter suggested there should be a more definitive line stated for when the plan will be reviewed, and then determine at the time of review if a revision is needed. The commenter suggested a 10-year time frame seems reasonable to them for a mandatory review to be implemented if one has not been initiated sooner.

**Response:** The NPS understands why the commenters would like a set review period, such as every 10 years. However, the comprehensive nature of the strategic plan (as opposed to an implementation-level plan) does not necessitate reviews at a regular interval. The NPS will update the strategic plan as appropriate to address major changes in Kennecott. Consistent with NPS policy and Director’s Order #2 Kennecott plans/strategies will be reviewed as needed, specifically if there are substantial changes required.

31. A commenter restated the importance of the longtime held goals of the larger Kennecott/McCarthy community:

- *“Retains the slow pace, quiet, and spaciousness that foster contemplation and individual reflection.*  
*In particular, NPS will encourage visitors to enjoy the NHL as pedestrians, and will seek to minimize the impact of management activities (including, but not limited to, noise and visual impact) on both visitors and local residents alike.*
- *Is part of a larger community in which residents act both individually and collectively to guide the future of the area.*
- *Contributes to a strong, reasonably diverse economy that includes locally owned and operated businesses, community-based nonprofits, and traditions of barter and subsistence.*

*- Is a place where tourism is allowed to evolve within the capacity of the community, rather than a place where external intervention and control accelerate growth."*

**Response:** The NPS agrees with the importance of these goals, which will remain in the strategic plan.

32. A commenter provided examples for visitor services goals:

1. *"Provide visitors opportunities to learn about the mines and the mill town, the historic relationship of Kennecott and McCarthy, natural resources, the surrounding wilderness.*
2. *Include information and history on traditional and present day Ahtna in the Kennicott Valley as well as Copper Basin. Include history on the transition of the communities from 'historic' time frames to the present vibrant, embedded year round community.*
3. *Promote technology and management decisions that reduce noise and allow for quiet recreational opportunities . (An example of which has happened with installation of the solar array!)*
4. *Continue to maintain the historic visual ambiance of the Kennecott Millsite, keeping the present style of limited external additions.*
5. *Create a place of continued community opportunities for education, art, science, entertainment and growth by continued use of the Rec Hall and other facilities and locations."*

**Response:**

1. A similar goal *"Provide visitors opportunities to learn about the mines and the mill town; the dynamic history of rapid development, abandonment, and subsequent reawakening of the contemporary community; and the equally dynamic changes of the surrounding wilderness landscape"* was added.
2. A similar goal *"Promote increased institutional and public understanding of the history of indigenous people in the area, specifically in the Kennicott Valley, Chitina River drainage, and the Copper Basin, in coordination with tribes"* was added.
3. This change was incorporated.
4. This change was incorporated.
5. A similar example *"Continue Recreation Hall lease agreement with the Wrangell Mountains Center or other suitable entity to encourage community opportunities for education, art, science, entertainment, and growth."* was incorporated.

These changes were all incorporated in in Appendix A.

33. A commenter suggested revisions and expansions under backcountry information and access goals from *"Provide access to the backcountry beyond the NHL"* to cover the entire Landmark, not just the subdivision."

**Response:** This change was incorporated.

34. A commenter suggested revisions under backcountry information and access goals to include:

- *"Provide messaging (via in-person conversations with rangers, brochures, website information, etc.) that is educational, rewarding, and safety-informed.*
- *Coordinate with guide services and outfitters to facilitate uniformity of safety messaging, e.g., bear safety, river safety.*
- *Maintain trails and routes into the front and backcountry that originate within the NHL."*

**Response:** These changes were incorporated in Appendix A with minor modifications.

35. A commenter suggested revisions under modes of transportation to include:

- *"Encourage shuttle service access to Kennecott.*

- *Minimize public parking in the NHL.*”

**Response:** These changes were incorporated in Appendix A.

36. A commenter suggested revisions under modes of transportation implementation measures to include:
- *“Work to minimize park traffic in and out of NHL (park employee shuttles with incentives)(create a culture of carpooling and sharing vehicles).*
  - *NPS will continue to implement speed limits infrastructure.”*

**Response:** These changes were incorporated in Appendix A.

37. A commenter requested that the discussion of business opportunities and authorization within the Kennicott Subdivision should clearly specify that this discussion applies only to NPS owned lands, not private lands in the subdivision.

**Response:** This change was incorporated.

38. A commenter suggested consistency between guest services and visitor experience.

**Response:** This change was incorporated.

39. A commenter suggested the following edit in the visitor services topic:  
*“Provide visitors opportunities to learn about and connect to the mines and the mill town, the historic relationship of Kennecott and McCarthy, natural resources, the surrounding wilderness.”*

**Response:** A similar suggestion, *“provide visitors opportunities to learn about the mines and the mill town; the dynamic history of rapid development, abandonment, and subsequent reawakening of the contemporary community; and the equally dynamic changes of the surrounding wilderness landscape.”* was incorporated.

40. A commenter suggested the following addition in “Example Actions for NPS Workplans”:  
*“Provide a variety of media and interpretive programs, adopting modern interpretive concepts and including messages about safety practices, leave-no-trace practices, climate change, and the contemporary community.”*

**Response:** This change was incorporated in Appendix A.

41. To help limit *“noise and visual impact on both visitors and local residents alike”* near the Blackburn School NPS Visitor Center, and along Mainstreet Kennecott to the Historic General Store and Warehouse and base of Silk Stocking Row, a commenter proposed a nominally graded 1.5 to two-lane road be developed south of the NPS Shuttle Turnaround/Kennicott Glacier Overlook from the Copper River and Northwestern Railway that leads to the Historic Wagon Road (South Glacier Trail). In the meantime, the commenter suggested that SEAG and WMA should utilize the NPS Shuttle Turnaround to unload and load their clients. Finally, the commenter suggested the NPS property south and in front of SEAG's office should be designated as two accessible parking slots.

**Response:** This topic will be addressed in more detail in a future transportation-specific plan.

42. A commenter encouraged additional hiring of local staff in the Interpretation and Education Division to better meet listed Visitor Experience Goals. The commenter also suggested free entry to the Historic Concentration Mill and Historic Power Plant.

**Response:** The hiring of additional, local staff was added as an example of potential implementation measures in Appendix A. However, hiring additional staff, local or non-local, is dependent on base funding the park receives from Congress each year or through special projects approved by Congress.

The Power Plant is not currently open for entry for visitors or the concessioner due to safety hazards. Until those hazards are mitigated, the veranda is an option for viewing the interior of the structure.

Entry into the Concentration Mill is a required service provided through a Concession contract.

## **APPENDIX C: Excerpts from the Wrangell-St. Elias National Park and Preserve Foundation Statement.**

### **PURPOSE STATEMENT**

The purpose of Wrangell-St. Elias National Park and Preserve is to maintain the natural scenic beauty of the diverse geologic, glacial, and riparian dominated landscapes, and to protect the attendant wildlife populations and their habitats; to ensure continued access for a wide range of wilderness-based recreational opportunities; to provide continued opportunities for subsistence use.

### **SIGNIFICANCE STATEMENTS**

1. Wrangell-St. Elias National Park and Preserve provides superlative scenic beauty.
2. Wrangell St. Elias National Park and Preserve encompasses the nation's largest protected active glacial complex.
3. Encompassing portions of three major mountain ranges, Wrangell-St. Elias National Park and Preserve contains vast areas of scenic high mountain terrain from sea level to 18,000 feet and includes nine of the sixteen highest peaks in North America.
4. Wrangell-St. Elias National Park and Preserve contains major river systems with more miles (over 1,000) of scenic, free-flowing, glacial rivers in their natural state than are found in any other protected area in the United States.
5. The vast undeveloped expanse of Wrangell-St. Elias National Park and Preserve contains diverse aquatic and terrestrial ecosystems, ranging from alpine to marine, and providing natural habitat for populations of Alaskan flora and fauna.
6. The Wrangell-St. Elias Wilderness is the largest unit of the National Wilderness Preservation System, encompassing nearly 10 million acres of remote and geographically diverse mountainous landscapes.
7. 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.
8. Wrangell-St. Elias National Park and Preserve is an inhabited area where local communities and traditional human activities remain integrated with the wilderness setting.

## **APPENDIX D: NPS Facilities including Utilities and Infrastructure**

*This appendix was included to align relevant portions of the 2013 KOP in one place. In this appendix is the guidance on facilities, utilities and infrastructure as written and approved in the 2013 KOP. Any future substantive changes to this prescription would require additional planning, public engagement, and compliance.*

### **2.6 NPS Utilities and Infrastructure**

#### **Millsite Water System**

The design for the water system is still underway and the Kennecott Operations Plan/EA will not serve as the NEPA compliance document for the water system. Instead, once specific design details are known, the project will be presented and analyzed in a separate EA. The EA would consider the impacts of the proposed system on water quality and quantity, vegetation, wildlife, area access, scenic quality, and the integrity of the cultural landscape. The comments submitted by the MAC subcommittee and individuals regarding the water system will be retained and addressed in that site-specific EA.

Components of a water system may include a water source (either a well or water intake from Bonanza Creek); a water storage tank; waterline between intake and the storage tank; water treatment; water distribution lines for potable water and/or limited fire suppression.

#### **Sanitary Sewer System**

Collection, treatment and disposal of sewage (wastewater) generated by visitors and staff in NHL buildings and on the west side of the Kennicott River will be achieved primarily by septic systems (septic tanks and leach fields).

The NHL buildings that could potentially be equipped with sewer service are the Dairy Barn, Old School, New School, West Bunkhouse, and Company Store.

The existing ADEC approved septic system and leach field has been expanded to service the Dairy Barn property acquired in 2005. The Store, West Bunkhouse, New School, Old School and Dairy Barn would be serviced by this system field.

Excavations would be made along the west side of the site behind the Store and under the historic wagon road. About 1050 lineal feet of buried sewer line from the Store to the Dairy Barn would be provided. Sewage lift station(s) may be required. The lift station would be installed in a buried manhole in the line between the Store and Dairy Barn. A total of 6-8 manholes would be constructed.

#### **Power Generation and Distribution**

A power generation and distribution plan will be developed based on projected power requirements for the next 10 to 20 years. The plan and subsequent design will take into account expansion of the system and use of alternate energy sources of power generation including hydro and solar power at Kennecott NHL. This information would include projected costs and the total hours of generator time that would be reduced/saved with alternative systems installed.

The generator located south of the Dairy Barn will continue to provide power for NPS operations at Kennecott as other alternatives are considered. NPS will construct an enclosure around the generator connex in order to mitigate noise production and visual impact.

#### **Solid Waste Management**

NPS supports working with the community to deal with solid waste issues, by promoting pack in/pack out concepts for visitors and landowners alike, and by supporting a recycling program. Bear proof garbage containers have been installed in Kennecott and the kiosk on the west side. Bear proof recycling



containers will be installed at the Company Store and at the old school in Kennecott. NPS supports the development of a privately owned solid waste transfer facility and would consider utilizing such a facility if economically viable.

## **2.7 Zone by Zone Actions**

### **2.7.1 Administrative Core Zone: NPS Facilities including Utilities and Infrastructure**

#### **General Manager's Office**

*Stabilization:* Cyclic maintenance. For most preserved or rehabilitated historic structures, cyclic maintenance means repairs to roofing, windows (re-caulking), and re-painting on a 5 – 10 year cycle.

*Small scale features:* Reconstruction of boardwalk and stairs from GMO to Hancock addition.

*Interpretation:* Opened to the public in 2009. Enhance the sense of discovery by developing a hands-on resource space for corporate history. Plan components include durable, functional period workplace furnishings, mostly large tables and office chairs, and tabletop magnifying glasses, reinstallation of refinished drafting table and storage drawers that were taken out of the building during restoration and currently stored in the Machine Shop, and interpretive panels that introduce corporate leadership, including financial investors, and their on-site jobs. Part of self-guided walking tour and guided tour with concessioner.

*Vegetation:* Re-vegetate area with native seeds/cuttings from local populations.

#### **Hospital**

*Stabilization:* Implement interior false-work to keep walls, floors and roof from collapsing. Maintain a roof. No interior access proposed. No painting proposed.

*Interpretation:* Manage and interpret as a ruin. No interior access proposed. Part of a self-guided walking tour. Modify existing accessible windows so that visitors can see inside.

#### **Assay Office**

*Stabilization:* Will move salvageable remains of the building back to its original location.

*Interpretation:* Manage and interpret as a ruin. Part of a self-guided walking tour.

*Vegetation:* Remains of the building will be kept clear of tall woody vegetation for viewshed and fire protection.

#### **Railroad Depot**

*Stabilization:* Cyclic maintenance. Restore electrical systems.

*Interpretation:* Opened to the public from 2004 - 2007 as a visitor center. Replicate original Wells Fargo and Railroad Depot signs. Produce at least one panel for the interior. Part of a self-guided walking tour and guided tour with concessioner.

#### **Sawmill and Carpenters Shop**

*Stabilization:* None. Allow ruin to deteriorate in place.

*Interpretation:* Manage and interpret as a ruin. Part of a self-guided walking tour.

*Vegetation:* Keep the site and the margins around it free of vegetation in order to interpret as ruin and to protect from fire/rot. Selective thinning to improve and/or maintain views.

### **Company Store**

*Stabilization:* Work to include: Level 1--construct public restrooms, complete field lab area, interior finishes, lights, elevator/lift to Level 2 and 3, install utilities and additional furnaces. Level 3--construct staff office area, interior finishes, lights and communications. Maintain as visitor contact point and administrative office space.

*Vegetation:* Thin some trees to open up viewshed in front of deck area.

*Interpretation:* Opened to the public in 2009. Maintain as primary exhibit space with visitor access. To minimize interpretive intrusions in the town, the General Store will provide a central interpretive focus and a place to fully develop the landmark's primary stories. Given the need for durability and low maintenance, the full range of exhibit techniques can be used including hands-on and interactive media. Replicate original Post Office and General Store sign and open the post office for general public access. Consider developing the outside area of the front and back of store as a gathering place for visitors.

*Small scale features:* Maintain Hoist House #52. Clear random building material from interior, strong interpretive value. Re-establish cribwall/utilidor from Company Store to the end of the Carpenter's shop.

### **Railroad Trestle**

*Stabilization:* Minor finish work such as closing up utilidor. Cyclic maintenance.

*Interpretation:* Part of a self-guided walking trail.

*Vegetation:* Selectively clear for viewshed of glacier and tailings retaining wall.

### **National Creek Re-Channelization**

*Stabilization:* Based on the geotechnical evaluation of National Creek, we know that the rock glacier at the head of the valley continuously contributes a large sediment load to the stream. Engineering for stream rechannelization identified the need for the periodic removal of sediment. Removal will require periodic excavation from the stream bed to retain its current configuration. Excavation will require the use of heavy equipment such as backhoes and dump trucks. Planted materials in the actual streambed will be periodically impacted.

## **2.7.2 Industrial Core Zone: NPS Facilities including Utilities and Infrastructure**

### **Tram Terminus**

*Stabilization:* Work to include structural repairs to the upper mill including the tram deck, structural reinforcement to ore bin, floor repairs, and reconstruction of upper tram deck and roof. Dependent on funding, construction of a protective roof structure over the upper tram deck and roof may be considered rather than reconstruction.

*Interpretation:* Open to the public as part of a concession tour. *Vegetation:* Maintain scenic views through continued brushing.

### **Concentration Mill**

*Stabilization:* Work to include structural repairs including foundation repairs and column and truss repairs Levels 1 through 7. Mock-up for project to test internal stabilization methods was performed in 2011, with other work scheduled for 2012 and 2013. Repairs to the mill to repair the foundations and reestablish deteriorated timber crib retaining walls will require site disturbance during the period of construction.

Once completed, the landscape will be restored. Additional work dependent on funding will include structural repairs to the mill structure at Levels 8 and above. This work will include foundation and column and truss repairs, new roof construction, and stabilization of the ore bins.

The intent of the proposed work is to stabilize the structure for a guided visitor opportunity. Long term (more than 10 year) plans would include siding repairs and replacement and painting. Window repairs and replacement may be required to protect the interior of the building and to provide draft control as part of future fire suppression within the mill.

Recent work has been done to identify and delineate the deposition of detonation cord and blasting caps on the north side of the mill building. The inventory revealed the presence of large amounts of debris (estimated between 1500 and 1800 cubic yards) on the north side of the mill building potentially containing undetonated blasting caps. This area will continue to be posted as closed as long as the site is hazardous. Some of the mill building stabilization efforts identified above will require working in this area. Site specific mitigation of the hazard, through removal of the debris material, will occur prior to work being conducted in these specific areas. Removed material will be taken to a safe area, screened for blasting caps, and burned. Long term, much of the debris potentially containing blasting caps may remain on site. The area will be clearly posted and, if necessary, physical barriers will be put up at access points.

*Archeological resources:* Replace ore chute. Minimize disturbance to other interior and exterior archeological resources during stabilization.

*Interpretation:* Interpretation of the stabilized mill building through partnership/concession-led tours that meet NPS standards for interpretation. In the Sacking Garage, bring the sacking process to life by displaying an original flat car loaded with burlap bags filled with ore, show the sacking and stacking process with working pulleys to raise and lower the chute, and reinstall the original tracking scale and winch used to pull cars back and forth.

*Small scale features:* Track inclines on north and south sides of mill building will be brushed or otherwise cleared and managed as ruins; reconstruction of roof enclosure will occur on the utilidor along south edge of mill building. Internal stabilization of scale house and lab sheds.

## **Leaching Plant**

*Stabilization:* Ongoing work to include repairs to halt collapse onto railroad corridor, site stabilization, foundation replacement, repairs to floor and wall structure, lead paint mitigation (including painting), rehabilitation of doors and windows to control access. Scheduled work includes structural repairs to the walls of the leaching plant including column realignment and footings, shear wall repairs, truss repairs, and asbestos abatement. Allow south addition to collapse and manage as a ruin. Implement interior false-work/rigging to keep ruin structure from collapsing onto the railroad corridor or into the north addition. No interior access proposed in the south addition.

*Interpretation:* Continued tour opportunity with mill building. North sacking shed identified for future milling exhibit to accommodate physically challenged visitors that cannot access the Mill. Exhibits could include installation of original equipment such as shaker tables and crushers that demonstrate the different milling processes.

*Small scale features:* Stabilization/reconstruction of bracing and the original track incline for the leaching plant deck, north of leaching plant. Reestablish the deck at the north elevation with an integrated accessibility ramp into sacking shed.

## **Machine Shop**

*Stabilization:* Scheduled work to include reestablishment of collapsing service decks on north and south sides, door and window repairs, siding repair, and reconstruction of a porch roof over the east entrance.

*Interpretation:* This is the largest open interior space in Kennecott, and could be used to display original machinery such as the overhead hoist, forge, drive shaft, and belts, as well as return original machines and tools that were purchased in 1938 and shipped to Dunkle Mines. Produce at least one panel for the interior. After proposed structural repairs, building will be open to the public. Part of a self-guided walking tour.

### **Power Plant**

*Stabilization:* Mediate oil and asbestos in the area. Boiler and stack preservation treatment. Window repair/lead abatement including painting.

*Interpretation:* Roadside viewing platforms opened to the public in 2006. Maintain the one interpretive exhibit panel on upper mezzanine. Inside tour could be led by a concessioner on an ADA rampway. Exterior and upper decks can be part of a self-guided walking tour.

*Small scale features:*

- Stabilization of structure members (those affected by fire of the south deck of the power plant).
- Reconstruct small section of boardwalk with stairs west of power plant.

### **Transformer House**

*Stabilization:* Repair or replace missing windows and doors and paint. Landscape to improve drainage away from building.

*Interpretation:* Not open to the public. Part of a self-guided walking tour. Modify existing windows so that visitors can see inside.

## **2.7.3 Commercial Zone: NPS Facilities including Utilities and Infrastructure**

### **Refrigerator Plant**

*Stabilization:* Cyclic maintenance. Re-construct cribbing walls.

*Interpretation:* Opened to the public in 2008. Part of a self-guided walking tour. Produce at least one panel for the interior.

*Small scale features:* Restore historic ramp to the railroad corridor. Restore boardwalk.

### **West Bunkhouse**

*Stabilization:* 2013 work included exterior rehabilitation consisting of floor and wall repairs, construction of exterior shear diaphragm, siding repair and painting, repairs to doors and windows. Retain interior options for potential partnerships and/or interpretation. Depending on the nature of future partnerships and the adaptive re-use of this building, it may be necessary to make significant changes to the building to protect occupants from fire, to meet operational needs of the users, and to install electrical, heating and plumbing services. The prospective partner would be responsible for all interior improvements in accordance with *The Secretary of Interiors Standards for Treatment of Historic Properties*.

*Partnership:* NPS will consider partnering with a non-profit for long-term adaptive re-use and management of this building. Criteria for potential partners include:

- Financially capable of funding interior rehabilitation to accommodate proposed adaptive re-use.
- A partner who places value on protection of historic, cultural, and natural resources.
- A partner who has an existing or historic connection with the community and/or Kennecott.
- Adaptive re-uses of the building must also allow some public access for interpretive purposes.

Of the three bunkhouses remaining in the mill town, the National Creek and East Bunkhouses are in poor condition and will be managed into the future with little or no interior access to the public. Only the West Bunkhouse retains a high level of integrity reflective of its historic past, both with respect to its exterior appearance and to its interior design, functionality, and spatial layout. Because of the high historic and interpretive value of the structure, NPS has classified the interior rooms of the building relative to potential adaptive re-use. The purpose is to give potential partners an indication of where adaptive re-use might be considered. NPS rated each interior portion of the building as primary or secondary space. Primary space indicates rooms or areas that have maintained the integrity of their character-defining elements and retain high interpretive value. In general, adaptive re-use of these areas is acceptable provided the proposed use is compatible with the historic use of the room and as long as the design and materials needed for restoration are reflective of the original structure. Areas identified as primary space have a high interpretive value and NPS (or its partner) will have access for interpretation purposes. The following rooms and/or areas of the West Bunkhouse were identified as primary spaces:

*Ground floor:* Locker room; wash-up/sink area; office; west staff bunk room; staff area corridor; back porch.

*First floor:* Entryway; west side dining hall; and Kitchen/Pantry area.

*Second floor:* Lounge area; bunkrooms 1, 2, and 3 on the east end; and the hallway/corridor.

*Third floor:* Head of the stairway and the hallway/corridor.

*Interpretation:* Open to the public after interior modification, in cooperation and consultation with prospective partner. After adaptive re-uses to support partnership have been determined, develop an interpretive panel for the interior that links the building, via text and images, to the historic use of the structure. Include interpretation of the Japanese cooks. Part of a self-guided walking tour and guided tour with concessioner.

### **New Schoolhouse**

*Stabilization:* Restore classrooms after maintenance activity is removed from building. Install chalk boards, refinish floors.

*Interpretation:* Possible future classroom for visiting school groups and/or interpretive exhibit space. Part of self-guided walking tour. Acknowledge the location of the handball court/hockey rink in future interpretive material.

*Small scale features:* Re-establish cribwall/utilidor between New School and West Bunkhouse.

### **Recreation Hall**

*Stabilization:* Cyclic maintenance. Install sprinkler system. ADA compliant hardening of walkways to outhouses.

*Partnerships:* Completed lease agreement with Wrangell Mountain Center to manage the building for community events, interpretive programs, and classroom purposes.

*Interpretation:* Opened to the public in 2003. Part of a self-guided walking tour. Two interpretive panels were installed in 2004.

*Small scale features:* Hose house was rehabilitated and will be utilized to provide storage for fire suppression supplies (backpack pumps or extinguishers).

### **Old Schoolhouse**

*Stabilization:* Cyclic maintenance. Utilize boardwalk behind building to connect this building with the shuttle turnaround, thus providing a continuous visitor orientation space. Porch behind building would be

extended and roofed. Benches installed to provide covered visitor space. Existing outhouse “expanded” to provide men’s and women’s vault toilets.

*Interpretation:* Convert the Blackburn School into a staffed, contact station offering backcountry information, orientation, and safety messages. Possible space dedicated to concessioner who offers guided tours through Kennecott NHL. Install interpretive panels that introduce each of the landmark’s themes and that interpret the Blackburn School building history. Update the Scope of Sales and develop displays for Alaska Geographic sales. Part of a self-guided walking tour. Possible future use as winter caretaker office.

### **Dairy Barn**

*Stabilization:* Cyclic maintenance. Future use as shop/break room and this area will be utilized for employee parking. Enclosure for generator, construct material shed and security shed.

## **2.7.4 Residential A Zone: NPS Facilities including Utilities and Infrastructure**

### **East Bunkhouse**

*Stabilization:* Re-siding and painting, with salvaged materials and new, “shadow” reconstruction of lower-level windows and doors (openings are framed but do not contain actual doors or windows). Replace roof and stabilize. Re-grading around building. This building is critical to maintain in place for National Creek stability.

*Interpretation:* Manage and interpret as a bunkhouse. Controlled access proposed. Part of a self-guided walking tour.

### **National Creek Bunkhouse**

*Stabilization:* Work to include interior reinforcement to help stabilize the structure, re-roofing to extend the life of the ruin structure. Manage as a ruin as part of the Kennecott streetscape.

*Interpretation:* Manage and interpret as a ruin. No interior access proposed. Part of a self-guided walking tour. Modify existing windows on the lower level so that visitors can see inside.

### **South Silk Stocking Cottage**

*Stabilization:* Cyclic maintenance.

*Interpretation:* Part of a self-guided walking tour, incorporating educational materials regarding respect for private property.

### **North Silk Stocking Cottage**

*Stabilization:* Cyclic maintenance. Remove sauna above cottage.

*Interpretation:* Part of a self-guided walking tour, incorporating educational materials regarding respect for private property.

## **2.7.5 Residential B Zone: NPS Facilities including Utilities and Infrastructure**

### **Kennecott Cottage 39C, Lot 88**

*What has been done:* Previous owners did interior work. Interpretive panel installed. New roof installed.

*Proposed Actions (structural):* Work to include lead paint mitigation, re-establish trim and cabinetry details, repairs to interior paneling, floors and ceiling, new electrical wiring and lights, interior and exterior painting, doors and window repairs. Reconstruct outhouse and boardwalk in the back.



*Interpretation:* Opened to the public in 2006. One interpretive panel installed in 2007. Manage as an historic period residence and as part of a self-guided walking tour.

*Vegetation:* Re-establishment of historical vegetation - this may be a lawn and garden.

#### **Kennecott Cottage 13C, Lot 80**

*What has been done:* This cottage on the east side of the railroad bed, was acquired by NPS in 2005. Nothing has been done.

*Proposed Actions (structural):* Manage as ruin.

*Interpretation:* Manage and interpret as a ruin. No interior access proposed. Part of a self-guided walking tour.

*Vegetation:* Selective thinning that allows views of boardwalk, cottage, and railroad bed without allowing for entry to this unsafe area.

#### **Kennecott Cottage 39B, Lot 87**

*What has been done:* Acquired by NPS in 2011. Collapsed under snow load, winter 2012.

*Proposed Actions (structural):* Consolidate collapsed material and manage as ruin.

*Interpretation:* Part of a self-guided walking tour.

*Vegetation:* Clearing for fire protection as identified above.

### **2.1.6 Other: NPS Facilities including Utilities and Infrastructure**

#### **Jumbo Transfer Station**

*What has been done:* 2008 work included volunteer effort for emergency foundation and roof repairs, improvements to stop animal access into the building.

*Proposed Actions (structural):* Future work to include reroofing, wall and floor repairs, structural repairs.

#### **Jumbo Mine Aerial Tramway**

*What has been done:* 2003 documentation.

*Proposed Actions (structural):* Stabilization of the Nps-managed lower portion of the tramway system. Stabilization to include replacement of deteriorated structural members on tram towers, capping of column members with metal to prevent further deterioration, and bracing and reaffixing missing connections.

*Vegetation:* Brush removal would occur around NPS owned towers. The portion of the tramway visible from the tram terminus will be brushed to that the tramway system is evident. This action is dependent on possible NPS acquisition of Lot 65 above the tram terminus.

#### **Mudhole Smith cabin**

*What has been done:* Vegetation clearing for fire protection.

*Proposed Actions (structural):* Replace sill logs, remove non-historic interior flooring, cap the chimney hole to prevent rain and snow from getting in, and maintain the roof and door window openings.

*Interpretation:* Interpretive site with exhibit regarding aviation history in the area.

### **Jumbo Mine/Root Glacier outhouse**

A vault toilet would be installed near the junction of the Root Glacier trail and the Jumbo Mine trail. The intent is to take pressure off the more remote (and unserviceable) Jumbo Creek outhouse.

The existing Jumbo Creek outhouse will be re-built and re-located. The interior of the new outhouse will be constructed of materials that are easier to clean.

### **Cemetery**

NPS would consider developing a map of the cemetery that would be part of a self-guided tour. Proposed activities at the cemetery include fence maintenance/reconstruction; brushing of native vegetation in order to define cemetery plots; and maintenance of grave markers. To date no invasive plants have been documented in the cemetery but it will continue to be monitored for them and if found, they will be removed. Non-invasive, non-native plants do grow in the cemetery and will not be removed as they may be a part of historic plantings. A cultural landscape report has been prepared for the cemetery which includes recommended treatments. These proposed actions are consistent with the cultural landscape report recommendations.

The final cultural landscape report for the cemetery will be made available for public review and will be appended to this document.

## APPENDIX E: Transportation, Access, and Circulation

*This appendix was included to align relevant portions of the 2013 KOP in one place. In this appendix is the guidance on transportation, access and circulation as written and approved in the 2013 KOP. Any future substantive changes to this prescription would require additional planning, public engagement, and compliance.*

### 2.5 Transportation/Access

#### **Kennecott Arrival/Orientation**

The park held a public meeting in summer 2012 to discuss the arrival and orientation of visitors to Kennecott.

The following items were discussed and decided:

- Shuttle van drop off and pick up needs to best accommodate those businesses that are providing that service. In light of this, shuttle van pick ups and drop offs will continue at the current location (between the Blackburn school and St. Elias Alpine Guides office) with occasional overflow pick-ups and drop-offs at the shuttle turnaround.
- To provide the best visitor orientation, the shuttle turnaround will be linked via a raised boardwalk to the Blackburn school. The existing deck behind the Blackburn school will be expanded and roofed to provide a covered seating area. A bulletin board will be installed in this area. The existing outhouse will be expanded to provide men's and women's vault toilets. Additionally, there will be some identifying feature (sign, arrowhead on the door) visible to those getting off shuttle vans that identify the Blackburn building as an NPS facility.
- NPS will avoid parking in the space north of the Blackburn building.

#### **Motor Vehicle Use Within the NHL**

Use of the rights-of way in the NHL is governed by the Kennicott Subdivision plat filed with the State of Alaska by the Great Kennecott Land Company in 1976. Local landowners accepted the conditions of the plat when they purchased their land, prior to the acquisition of the remaining parcels by WRST in 1998. The NPS is a neighbor of landowners within the subdivision and recognizes that it is bound by the same conditions.

The Kennicott Subdivision plat filed with the State of Alaska specifies that "the rights-of-way as shown or noted are private, reserved for the use of the present owners of lots in this subdivision and their guests, but not the public in general." The NPS supports park visitors coming to the NHL in a non-motorized fashion and utilizing local shuttle services to access the site because of the complexity of motorized access to the millsite subdivision, and the effects of motorized use on visitor experience.

A community workshop was held in Kennecott in the summer of 2012 to discuss access to the millsite subdivision and to discuss parking. The workshop addressed these issues over a 3-night period and was well attended by local business owners, millsite subdivision lot owners, and those supporting motorized access. NPS facilitated the meeting and the group developed the following vision statement for access to the millsite subdivision:

- Access to the millsite subdivision is predominantly through shuttle services and other non-motorized means. Vehicle access and parking will be managed to minimize impacts to visitors and residents, minimize congestion and maximize safety.

The community expects NPS to set an example regarding motorized access. In recognition of this, NPS is committed to maintaining a usable employee shuttle service and encouraging employees to use it. Visiting NPS staff need to be conscious of minimizing motorized trips between McCarthy and Kennecott.

*Subsistence ORV use:* The use of Off-Road Vehicles by federally qualified subsistence users in the area is authorized by 36 CFR 13.460, which allows the use of “surface transportation traditionally employed”. The 1986 Wrangell St. Elias National Park and Preserve General Management Plan made the determination that ORVs were a traditional means of access for subsistence purposes in the park. This Kennecott management plan does not propose any restrictions on this activity.

## **Parking**

Kennecott residents and the park agree that Kennecott has very limited parking space. In consultation with the local community, the park has identified the following action items:

- Provide limited (10-space) designated parking in the dairy barn area. Users to include: handicapped; local use for non-shuttle times; special events; visitors; and lot owners with no property access. Additionally, NPS has established and will continue to maintain a parking area for employees and contractors near the Dairy Barn. NPS will run a shuttle for employees that live on the West Side or McCarthy but work in Kennecott, so as to minimize park vehicle traffic.
- Consider options for a pedestrian trail from the designated public parking in the Dairy barn area to the shuttle bus turnaround or Blackburn school area.
- When access to private property is restricted due to winter conditions, Kennecott landowners will be free to park on the main rights-of-way within Kennecott.
- WRST will work with the local community to support an efficient public shuttle system and adequate hours of operation, to reduce the need for parking within the NHL.
- The park will develop a public education campaign through the park’s website, signs, and brochures at information kiosks in Kennecott/McCarthy and along the McCarthy Road, informing the public of the local shuttle system and the lack of public parking in the NHL.
- No parking at the shuttle turnaround (after a parking spot is designated).
- No parking on NPS owned portions of easements in the millsite subdivision.
- Utilize restored features (boardwalks, railroad rails) to discourage parking.
- A 10 mph speed limit will be posted through the Kennecott Subdivision, posted at the NHL boundary.

## **Roads**

*Alaska State ROW, McCarthy to Kennecott:* NPS will encourage ADOT&PF to design the rail corridor road as a one-lane gravel road that maintains its historic character with a 25-mph speed limit designed to accommodate safe vehicle passing.

*Subdivision easements within the NHL:* A cooperative agreement will be sought with NHL lot owners and businesses to address NHL road maintenance.

*Wagon Road:* Segments of the Wagon Road that occur on NPS lands will be managed primarily as a pedestrian trail, with allowance for motorized use for those accessing private property along the trail and for federally qualified subsistence users engaged in subsistence activities.

*Toe of the Kennecott Glacier Road:* This road traverses private land, university sub-division lands, and finally NPS lands. The NPS portion of this road will be designated a park road, open to motorized use. Motorized travel on NPS lands off the designated road will only be allowed for federally qualified subsistence users engaged in subsistence activities.

## **Trails and Glacier Access**

Kennecott is not just a historic site; one of the most common and important activities undertaken by visitors to Kennecott is use of the hiking trails that provide access to surrounding frontcountry and backcountry, including the heavily visited Root and Kennicott Glaciers. Two of the most popular hiking

trails in the park are included, in their entirety, within the boundaries of the Kennecott NHL: trails to the Root Glacier and to the Bonanza/Jumbo Mines. Management of these and other trails and associated visitor activities is therefore central to the Kennecott Operations Plan. This section addresses trails which provide access to the surrounding frontcountry and backcountry from the Kennecott townsite, including the following: 1) the Root Glacier Trail with connections to the glacier itself and the Erie Mine area; 2) the Bonanza Trail with connections to Bonanza and Jumbo Mines; 3) the “Wagon Road” towards McCarthy, and 4) a proposed trail alongside the Kennicott Glacier towards the Kennicott River footbridge with connection to a proposed walk-in campground. Short pedestrian trails and boardwalks within the Kennecott townsite are discussed elsewhere in this document (see proposals listed under “Circulation and Access” for the Industrial, Administrative Core, and Residential A zones), but we note here that these shorter trails work in concert with frontcountry/backcountry trails to promote and preserve a pedestrian-oriented experience within and around the NHL.

All frontcountry/backcountry access trails will be managed and maintained as pedestrian-oriented trails with accommodation, where appropriate, for permitted uses of motorized vehicles by local residents and their guests and for subsistence activities. To preserve the natural character of the area surrounding the NHL, regulatory and interpretive signs will be kept to a minimum along the corridors of these trails, but a strong emphasis will be placed on provision of educational and interpretive information at trailheads and within the NHL itself. This information will be delivered by an appropriate combination of posted signs and maps, available pamphlets and self-guided tours, and direct contact by NPS rangers and other interpretive partners, and will collectively emphasize the following: 1) safe and low impact travel techniques in the front and backcountry, including bear safety; 2) interpretation of natural/cultural/glacial history of the surrounding area, and 3) appropriate locations and practices for hiking, camping, picnicking, food storage, use of toilets, etc., with an emphasis on protecting natural resources and private property. Patrolling of trails will be provided at a level sufficient to enforce visitor observance of these practices.

NPS will construct a 3.5 mile pedestrian trail to the NHL from the footbridge over the east (dry) fork of Kennicott River. The route will generally follow the east side of the Kennicott Glacier, staying well away from private property, from the viewshed of the railroad corridor, and from popular swimming areas at the toe of the glacier. Route planning will incorporate community input and will take into account the evolving viewshed as the Glacier continues to thin and retreat. At the north end, the foot trail would connect with the old Wagon Road in the vicinity of the West Bunkhouse or Company Store. The trail would be constructed and maintained exclusively for non-motorized use, with a tread approximately 2 feet in width constructed of unconsolidated outwash and existing moraine material, and with minimal alterations of grade as necessary only to ensure safety and that water will move off the trail.

### **2.7.1 Administrative Core Zone: Circulation/Access**

The following are proposed for this zone:

- Improvement and maintenance of a pedestrian trail from the General Manager’s Office, up the creek to the footbridge, connecting to the top of the mill building. This trail would connect with the Old Wagon road and Silk Stocking Loop described in the Residential A zone.
- Where historically appropriate, reconstruct hose houses that will be used to store limited wildland fire suppression supplies (such as backpack pumps or extinguishers).

### **2.7.2 Industrial Core Zone: Circulation/Access**

- Construct accessible trails and boardwalks behind the power plant, machine shop, and leaching plant.
- In cooperation and consultation with private lot owners, consider restoration of boardwalks and/or railroad within this zone as a tool to control parking.

### **2.7.4 Residential A Zone: Circulation/Access**

The old wagon road from the Company Store through the landslide at the south slope of National Creek will be cleared and maintained for pedestrian use only. The landslide will be by-passed or a trail constructed through it

**2.7.5 Residential B Zone: Circulation/Access**

Maintain historic access routes for pedestrian and local vehicle use.

## APPENDIX F: VEGETATION MANAGEMENT

*This appendix was included to align relevant portions of the 2013 KOP in one place. In this appendix is the vegetation management prescription as written and approved in the 2013 KOP. Any future substantive changes to this prescription would require additional planning, public engagement, and compliance.*

### 2.7.1 Administrative Core Zone: Vegetation

The following vegetation clearing will be done around all historic structures on NPS lands in this zone, for fire and windfall protection; and for access to the buildings:

- Clear all spruce within 30' of all structures.
- Limb spruce trees up to 10' above the nearest surface fuel within 100' of all structures.
- Clear all woody vegetation within 5' of all structures.
- Selectively clear or plant other vegetation to maintain quality viewsheds.

Invasive plant species will be managed consistent with the 2010 NPS Alaska Region Invasive Plant Management Plan and EA. This document and Finding of No Significant Impact (FONSI) describe the following elements of invasive plant management:

1. Continue physical control methods where effective.
2. Allow limited use of herbicides to control infestations not responding to physical control methods; and
3. Implement mitigating measures with best management practices and monitoring of overall program effectiveness and environmental effects.

Revegetation: Where needed native vegetation may be planted to screen modern NPS facilities using native seeds/cuttings from local populations. In some selective cases historically accurate non-invasive non-native plants may be planted to enhance the cultural landscape.

### 2.7.2 Industrial Core Zone: Vegetation

The following vegetation clearing will be done around all historic structures on NPS lands in this zone, for fire and windfall protection; and for access to the buildings:

- Clear all spruce trees within 30' of all structures.
- Limb spruce trees up to 10' above the nearest surface fuel within 100' of all structures.
- Clear all woody vegetation within 5' of all structures.

Selective thinning for viewshed will also be undertaken in order to enhance views. Specific areas of consideration in this zone will be on NPS lands along the Portal trail above the mill building and along the trail linking the GMO to the top of the mill building. Revegetation of disturbed areas (such as proposed water lines) will be conducted utilizing native herbaceous vegetation seed collected from the surrounding area. Such plantings will also be considered in order to screen certain views. In some selective cases historically accurate non-invasive non-native plants may be planted to enhance the cultural landscape. Area will continue to be monitored for invasive plants and populations of such will be controlled and removed.

### 2.7.3 Commercial Zone: Vegetation

The following vegetation clearing will be done around all historic structures on NPS lands in this zone, for fire and windfall protection and to maintain public access:

- Clear all spruce trees within 30' of all structures.
- Limb spruce trees up to 10' above the nearest surface fuel within 100' of all structures.
- Clear all woody vegetation within 5' of all structures.



Vegetation screening will be considered in this zone, particularly to screen the Dairy Barn area from the shuttle turn-around viewshed. Views of the glacier will be maintained. Disturbed area revegetation will be considered as needed utilizing native herbaceous vegetation seed or historically accurate plantings collected from the surrounding area. In some selective cases historically accurate non-invasive non-native plants may be planted to enhance the cultural landscape. Area will continue to be monitored for invasive plants and populations of such will be controlled and removed.

#### **2.7.4 Residential A Zone: Vegetation**

The following vegetation clearing will be done around all historic structures on NPS lands in this zone, for fire and windfall protection and for access to the buildings:

- Clear all spruce trees within 30' of all structures.
- Clear all woody vegetation within 5' of all structures.
- Limbing of spruce trees up to 50' from the buildings. Consideration will be given to the effects on thinning/limbing on adjacent landowners and maintaining privacy/vegetation screening.

Elsewhere in this zone, selective thinning will occur in order to open views of the Kennicott Glacier and/or mill building. Specific locations include:

- Selectively clear mill building view sites on the Silk Stocking trail approaching the National Creek bridge.
- Selectively clear specific view positions along the historic wagon road on south side of National Creek to frame views of historic structures and glacier and mountains beyond. See description under Circulation and Access.

Encourage and/or allow vegetable and flower gardens present in 1938, including vegetable beds and flower boxes, based on historical documentation and precedent. Consider re-establishment of foundation plantings, and grass between cottages as reflective of the period. Invasive and high water demanding species will be avoided. Area will continue to be monitored for invasive plants and populations of such will be controlled and removed. Disturbed area revegetation would be considered as needed utilizing native herbaceous vegetation seed collected from the surrounding area.

#### **2.7.5 Residential B Zone: Vegetation**

The following vegetation clearing would be done around most historic structures on NPS lands in this zone, for fire and windfall protection and for building access:

- Clear all spruce trees within 30' of all structures.
- Clear all woody vegetation within 5' of all structures.
- Limbing of spruce trees up to 50' from the buildings. Consideration will be given to the effects on thinning/limbing on adjacent landowners and maintaining privacy/vegetation screening.

In cooperation with private landowners, clear woody vegetation along the rail corridor north of the Mill building to end-of-rail to reestablish conditions reflective of historic period and improve glacier views. Encourage and/or allow vegetable and flower gardens present in 1938, vegetable beds, flower boxes.

Invasive and high-water demanding species will be avoided. Area will continue to be monitored for invasive plants and populations of such will be removed. Disturbed area revegetation would be considered as needed utilizing native herbaceous vegetation seed collected from the surrounding area.



**United States Department of the Interior**  
**NATIONAL PARK SERVICE**

**Wrangell-St. Elias National Park & Preserve**  
**Mile 106.8 Richardson Hwy. P.O. Box 439**  
**Copper Center, AK 99573-0439**  
**907 822-5234 Fax 907 822-7216**  
**<http://www.nps.gov/wrst>**



**1.A.2 (Resource Management)**

MAY 31 2023

Dear Kennicott Subdivision Neighbors,

I'm reaching out to you today to 1) present the results of our Review of the National Park Service's (NPS) 2013 Kennecott Operations Plan (KOP), which officially brings the required five-year review of the KOP to a close, 2) invite you to an upcoming public meeting, 3) and to introduce the Revision of the KOP, which will begin later this summer and will have multiple opportunities for public input.

The KOP is a guiding document for NPS management of park land in and around the Kennecott Mines National Historic Landmark (NHL). It requires Wrangell-St. Elias National Park & Preserve (WRST) to review the plan every five years. We began the review process in 2018 and it has taken more time to complete than expected due to the pandemic, as well as because there are 64-action items identified!

This Review is both conclusive and provisional. It is conclusive because the information in this letter to you, and its associated supporting information, brings the Review process to a close. It is provisional, as our current understanding may change with new information and as we adapt towards durable and sustainable solutions to protect this special place. In any case, concluding this Review is cause for a celebration – please consider joining the NPS staff at 6pm, Friday, June 9th in Kennecott at the Rec Hall to learn more about the Review and how you can be involved in the Revision process, as well as our 2023 summer operations.

The KOP inspired an ambitious vision and I'm pleased to share that there have been many accomplishments, including:

- Stabilization objectives specified in the KOP have been achieved for many buildings including the hospital (although additional stabilization is under consideration), assay office, railroad depot, recreation hall, dairy barn, east bunkhouse, and National Creek bunkhouse.
- Stabilization work is partially complete or ongoing for several other buildings including the company store, tram terminus, concentration mill, leaching plant, machine shop, power

plant, transformer house, refrigerator plant, west bunkhouse, old schoolhouse, and certain Kennecott cottages.

- ANILCA local hire authority (a program in which only people who have either lived or worked in or near particular public lands may apply) is in place and actively used.
- Multiple buildings within the Kennecott Mines NHL are open to the public.
- Implementation of the 2011 Interpretive Concept Plan has begun, specifically with exhibit installations in 2016.
- Warning signage, a Contaminated Site Management Plan, and a Safety Plan to protect the public and employees from hazardous materials are developed.
- Jumbo Mine/Root Glacier outhouse was installed.
- Most septic tanks and leach fields have been installed.
- Brochures and other educational materials have been produced in collaboration with the community.
- The NPS has installed a hybrid solar and propane power generation system.

These accomplishments highlight the remarkable dedication of many people who embrace sharing the magnificent national resources of the historic Kennecott area with our community and the world! You can see the full and detailed list in the completed Action Items Review findings, attached in a table format for your convenience.

Some significant issues also requiring review have arisen since the release of the 2013 KOP. For example, remnant mining contamination prompted the initiation of a Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) investigation to evaluate additional cleanup of mining contaminants. This investigation is necessary before we can continue the next phases of restoration, and it will also inform the NPS's evaluation of options to provide public drinking water. Additionally, research during the KOP review resulted in NPS concerns regarding legal boundaries for the NHL. After extensive research, it has been determined that the NHL boundary currently depicted in most NPS records, as well as public-facing documents, is not correct. The actual legal boundary is smaller and consistent with the NHL designation in 1986. (See FAQs, attached, for more information). Another issue requiring increased clarity has been the roles and responsibilities of the Architectural Control Committee (ACC). Thorough research and consultation with departmental attorneys provided clarity of the committee's role and function and the NPS's participation in this Kennicott Subdivision Millsite Unit community organization. These are examples of the many significant issues brought to our attention in recent years, highlighting the myriad and complex issues in Kennecott.

Since I arrived at the park in August of 2016, many neighbors, citizens, and staff have helped educate me of the challenges and concerns of implementing the KOP. There are numerous tough issues regarding off-road vehicles and vehicles, noise, dust, human waste, visitor or "guest" experience, parking, transportation, safety, etc. that do not have clear cut fixes. For example, within the NHL boundary the park has the responsibility for some lands that are legally managed as park lands, while there are also individual NPS lots legally established within the Kennicott Subdivision, a State of Alaska platted residential community where the road easements are collectively owned by the Subdivision lot owners. The Kennicott Subdivision is divided into

individual units, in which the Millsite Unit has covenants with different legal expectations than other subdivision units where the NPS owns lots or land. In sum, these diverse set of legal authorities do not easily align and consequently limit the park's ability to find simple or straight-forward park-only solutions. Because of this, I'm convinced that a more holistic, community approach may be the best way to resolve our shared concerns.

This Review process has been both humbling and inspiring as we begin to understand these legal complexities while seeking clarity to grow our mutual understanding and find ways to work together. There is much more work to do, and I hope that this Review documentation will improve our transparency around issues that have been difficult to address.

Finally, thanks to the many people who dedicate their time and resources to protect Kennecott and for your neighborly patience and persistence to find a way forward, together.

Sincerely,



Ben Bobowski

Enclosure



## **Review of Findings** *organized as* **Frequently Asked Questions**

During the Review we realized there is a lot of information to discuss with you, our neighbors, as well as community members and the public. To organize topics into ‘bite-sized chunks’ of information and to aid in shared understanding, we have prepared the Review summary divided in two parts. The first part is the Action Items Review document, attached to this letter, that reviews the status of all actions identified in the 2013 KOP Finding of No Significant Impact (FONSI). This second part is below and has Frequently Asked Questions (FAQs) divided into topics. It is our goal to make as much information available as possible, with a commitment to continue to add key documents and information.

The FAQs are organized into three sections: Foundational Understanding, KOP Action Items Review, and Revision.

### **Frequently Asked Questions: Foundational Understanding**

#### **What’s the difference between Kennecott and Kennicott and why do I see the two different spellings?**

The place name was originally applied to the Kennicott Valley in 1899 when Oscar Rohn, a United States Geological Survey (USGS) geologist, named the Kennicott Glacier in honor of Robert Kennicott, a Smithsonian naturalist and explorer who died in 1866 before ever visiting the valley that would be named after him. As his name was spelled with an ‘i’ so was the glacier and other natural object related to it.

The ‘e’ appeared later when a copper company was formed to extract ore from mines high in the Kennicott Valley. For reasons lost to history, but often interpreted as a ‘clerical mistake,’ that company named itself the Kennecott Copper Corporation (with an ‘e’). Hence the two spellings. The Kennecott Copper Corporation and the Kennecott Mines NHL (which commemorates that mining company’s activities) spell it with an ‘e.’ The *place* names (Kennicott Glacier, Kennicott River, Kennicott Valley) are spelled with an ‘i.’

One ambiguity remains. What do we call the *town* of Kenn(i)(e)cott? Is it named with an ‘i,’ in honor of the glacier it sits beside? Or with an ‘e,’ in recognition of the mining company that built it? Many people choose the latter interpretation, referring to the town of Kennecott. Some note that the historic railroad depot in town spelled it with an ‘e.’ However, this 1925 picture of the railroad depot, with a sign painted and placed by the copper company, spells ‘Kennicott.’

So, ‘Kennicott’ or ‘Kennecott,’ how should we refer to the town? The NPS uses the spelling ‘Kennecott,’ but understands the ambiguity and encourages you to take your pick based on whatever methodology or reasoning you would like.



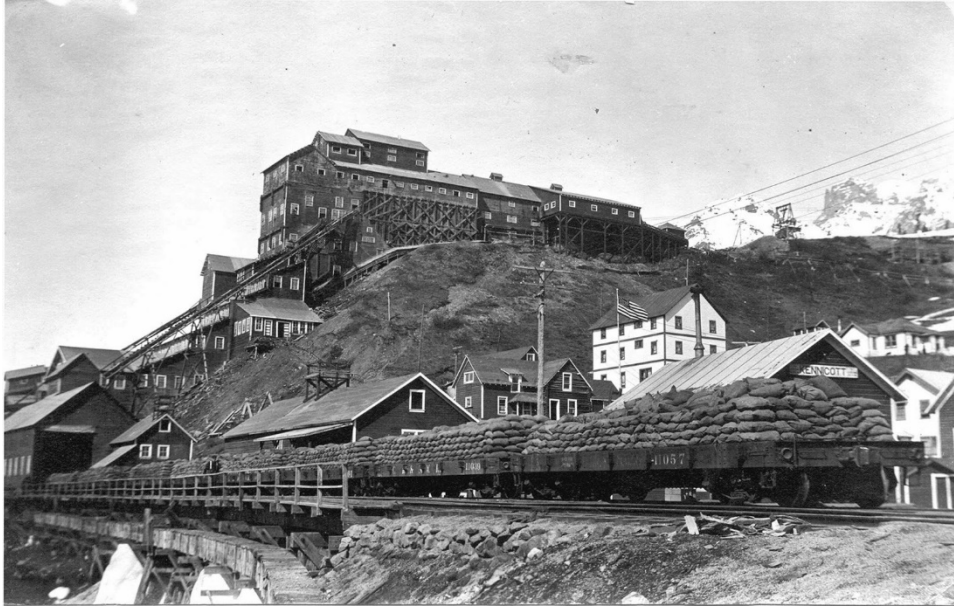


Figure 1 Circa 1925 photo of the railroad depot in Kennicott. See closeup in Figure 2.



Figure 2 Closeup of Figure 1.

(Source: <https://copperiverry.blogspot.com/2015/01/mile-196-kennicott.html>)

### **What is a National Historic Landmark?**

A National Historic Landmark, or NHL, is a designation. NHLs are buildings, sites, districts, structures, and objects that have been determined by the Secretary of the Interior to be nationally significant in American history and culture. Many of the most renowned historic properties in the nation are NHLs. Mount Vernon, Pearl Harbor, the Apollo Mission Control Center, Alcatraz, and Martin Luther King's Birthplace are NHLs that illustrate important contributions to the nation's historical development.

- (source: <https://www.nps.gov/subjects/nationalhistoriclandmarks/faqs.htm>)

**Are there requirements that I maintain my property to NPS standards or restore it to its original or historic appearance?**

**No.** While the NPS encourages owners to use the Secretary of the Interior's Standards for Historic Preservation Projects, owners are under no requirement to follow this guidance.

- (source: <https://www.nps.gov/subjects/nationalhistoriclandmarks/faqs.htm>)

\*Note: for those lots within the Kennicott Subdivision Millsite Unit, there are subdivision covenants, unrelated to the NHL designation, that apply.

**Is my property likely to be affected by federal laws and regulations?**

Federal, state, and local government-owned properties as well as private schools, institutions, and non-profit organizations are often recipients of Federal funding, and, therefore, would be affected by Federal laws. There is also Federal legislation that affords some degree of protection to archeological sites and the artifacts contained in them. Private property owners of commercial or residential buildings are less likely to be directly affected. However, Federally funded construction of highways, utility lines, or buildings may affect adjacent, privately-owned historic properties.

- (source: <https://www.nps.gov/subjects/nationalhistoriclandmarks/faqs.htm>)

**Are there federal funds available for preserving or protecting NHLs?**

**Yes.** The National Register of Historic Places (NRHP) is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect America's historic and archeological resources. NRHP listing is a condition for receiving grants and loans from many state and local governments as well as private sources. Some funding sources give NHLs higher priority for funding than other NRHP properties. There are also Federal income tax incentives available for donating easements and for rehabilitating income-generating historic buildings. Limited Federal grants through the Historic Preservation Fund are available; NHL owners should check with their [State Historic Preservation Officer](#) or [National Historic Landmarks Program regional office](#) to find out about the availability of Federal and state funds. Often state and local governments have grant and loan programs available for historic preservation; these funds tend to be for small amounts.

- (source: <https://www.nps.gov/subjects/nationalhistoriclandmarks/faqs.htm>)

**What other benefits are there from NHL status?**

This list of benefits is from the national NPS NHL website, and the benefits listed may not be currently utilized at the Kennecott Mines NHL but illustrate the types of benefits generally available from NHL status.

The NPS provides technical preservation advice to owners of NHLs. Questions regarding preservation issues are routinely answered by phone or letters, or during on-site visits by NPS staff. The following are other forms of assistance the NPS provides to owners:

- The NPS publishes and distributes information available to NHL owners and administrators on a variety of preservation subjects. The NPS publications catalog is available on this page about [NPS History Publications](#).
- From time to time, the NPS contacts NHL owners about the condition of their properties and may ask for permission to visit. The information is also used by the NPS to plan its assistance programs and helps in grant-making decisions.
- Each year, as funding permits, a limited number of NHL buildings may be selected to receive in-depth site inspections funded and coordinated by the NPS regional offices. The purpose of these inspections is to analyze the specific condition of the NHL, identify and prioritize recommended work treatments, and estimate the costs for carrying out this work. If funding permits, information derived from the in-depth inspection may be compiled in a building condition

assessment report which may be made available to owners, preservation organizations, and interested public and private groups.

- (source: <https://www.nps.gov/subjects/nationalhistoriclandmarks/faqs.htm>)

#### **How does NHL designation affect my ability to make changes on my property?**

Listing of private property as an NHL or in the NRHP does not prohibit under Federal law or regulations any actions which may otherwise be taken by the property owner with respect to the property. The NPS *may recommend* to owners various preservation actions but owners are not obligated to carry out these recommendations. Property owners are free to make whatever changes they wish if Federal funding, licensing, or permits are not involved. Federal laws that involve NHLs are listed in the Federal regulations governing this program, specifically in [36 CFR § 65.2 "Effects of Designation."](#)

Owners should keep in mind that state laws or local ordinances may affect NHLs if these legal mechanisms recognize and protect NHLs, independent of Federal law.

- (source: <https://www.nps.gov/subjects/nationalhistoriclandmarks/faqs.htm>)

\* Note: for those lots within the Kennecott Millsite Unit, there are covenants that apply.

#### **Will I have to open my property to the public if it becomes an NHL?**

**No.** There is no such requirement as a result of NHL designation. The overwhelming majority of NHLs are privately-owned properties. Some grant sources, however, may require that recipients of funding make their property available to the public under very restricted circumstances.

- (source: <https://www.nps.gov/subjects/nationalhistoriclandmarks/faqs.htm>)

#### **Where can I learn more about NHLs?**

You can learn more by exploring <https://www.nps.gov/subjects/nationalhistoriclandmarks/index.htm>

#### **What is the origin of Kennecott Mines NHL?**

The Kennecott mill town, associated structures, and other cultural features dating to the early 20<sup>th</sup>-century mining era have long been appreciated and recognized for their historic significance. In 1978, the Kennecott Mines National Historic District, a site with State or local significance, was listed on the NRHP the official list of the Nation's historic places worthy of preservation. In 1986, the Kennecott site formally was designated as Kennecott Mines NHL due to its national significance for preserving an extensive variety of historic properties associated with early 20<sup>th</sup>-century copper mining. There is a rich history of community engagement that realized the dream of this designation. The official designation along with a thoughtful narrative describing its national significance can be found at the following links.

- [NPGallery Asset Detail \(nps.gov\)](#)
- [Kennecott Site Bulletin Web Version.pmd \(nps.gov\)](#)

#### **What is the origin of NPS involvement in managing properties in the NHL?**

In June of 1998, the NPS acquired many of the significant buildings and lots of the Kennecott Mines NHL and began the effort to stabilize and restore the buildings. With the purchase of the lots, the NPS became a partner in management of Kennecott. Prior to the 1998 purchase, the NPS completed several special studies and reports to assist in the cleanup of hazardous materials and to assess the requirements for stabilizing historic structures. Over the years the NPS has provided technical assistance to local organizations and individuals interested in documenting and stabilizing historic structures in the town. The NPS also completed several inventories and resource assessments, providing baseline information to park management.



**With NPS acquisition of property in 1998, does this mean that the NPS manages the NHL?**

**No.** As discussed above, an NHL is a designation. The Kennecott Mines NHL was originally designated to include private and business properties. The NPS acquisition included *a portion* of those properties. As such, the NPS manages a portion of residential lots within the designated NHL boundary; however, it does not manage the NHL itself.

**If the NPS manages only certain lots within the NHL, what does that mean practically for the NHL?**

It means that Kennecott Mines NHL is like many other cultural locations and NHLs throughout the United States where the NPS has a responsibility for the lots/structures owned by the United States and the local community has governance roles and responsibilities for the community. It is important to note that as of 2023, the private lots within the Kennicott Subdivision remain non-organized and unincorporated. In the end, many issues of community concern may only be resolved with more holistic Kennicott Subdivision-wide approaches in which the NPS is a neighbor and partner.

\*Note: an exception to the above is the existence of the ACC for the Millsite Unit of the Kennicott Subdivision. This is distinct and separate from the NHL designation. See below.

**Do you have a map that helps to visualize the legal boundary of the designated NHL?**

Yes. Below is the map with legal boundary.

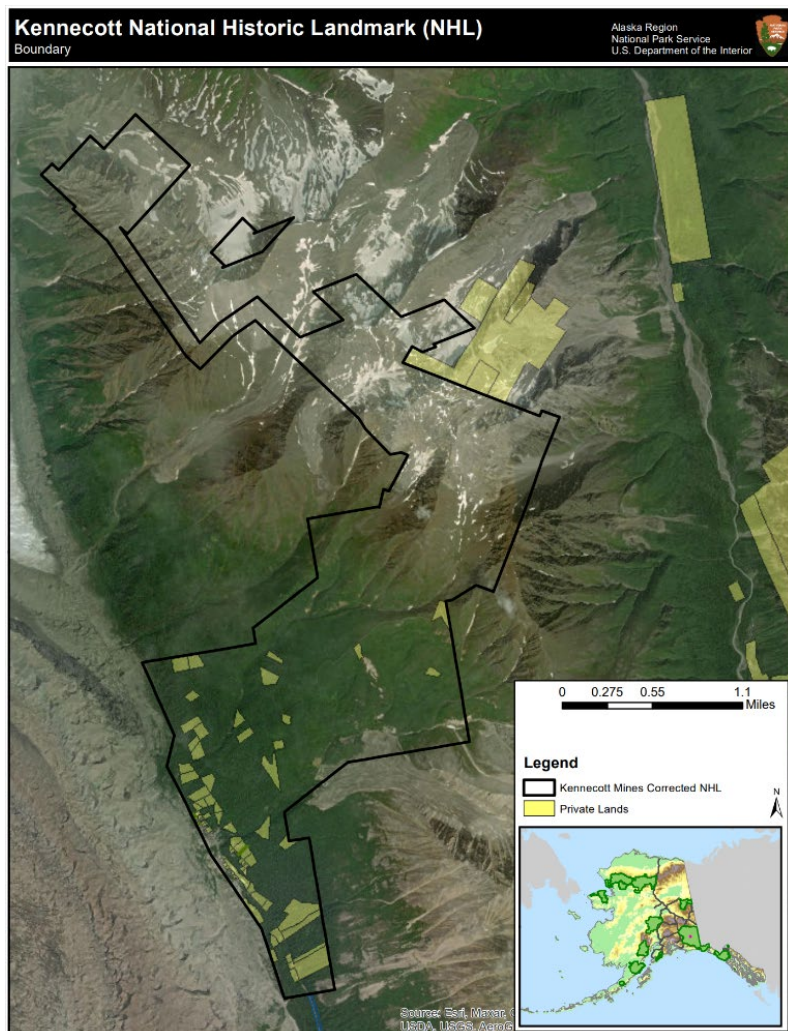


Figure 3 1986 NHL Boundary.

**This boundary map looks different than others I have seen. Can you please explain why?**

Through the KOP Review process, our research indicates that the boundary of the 1986 Kennecott NHL has been depicted incorrectly in both Alaska Regional Office and WRST records since at least 1993, *before* the NPS began acquiring land and structures associated with the Kennecott mining town in 1998. According to records found to date, the 1993 map was submitted to reconcile a perceived discrepancy within the site's 1986 NHL nomination form between the site's description and its geographic data. Mistakenly believing the discrepancy was due to an error in the geographic data, a new map was created that encompassed all of the features described in the nomination. While a technical correction can be made by the National Chief Historian without Advisory Board or Secretarial approval, the NPS NRHP Office must provide written notice of the correction to certain landowners and elected officials before the change legally takes effect. Our research indicates that the office of the NRHP did not further review the recommendation or provide the required notices. The 1993 recommended boundary description "correction" for the NHL was erroneously incorporated into NPS Alaska Regional administrative records as the recognized boundary and was then relied upon in the planning and management documents of WRST after the 1998 land acquisition at Kennecott. The administrative record has been clarified to depict the legally correct boundary of the Kennecott Mines NHL to be the legal boundary of the 1976 National Historic District and 1986 NHL Nomination that follow the exterior

boundary of the former landholdings of the Consolidated Wrangell Mining Company and the Great Kennicott Land Company. For comparison of boundaries see the map below.

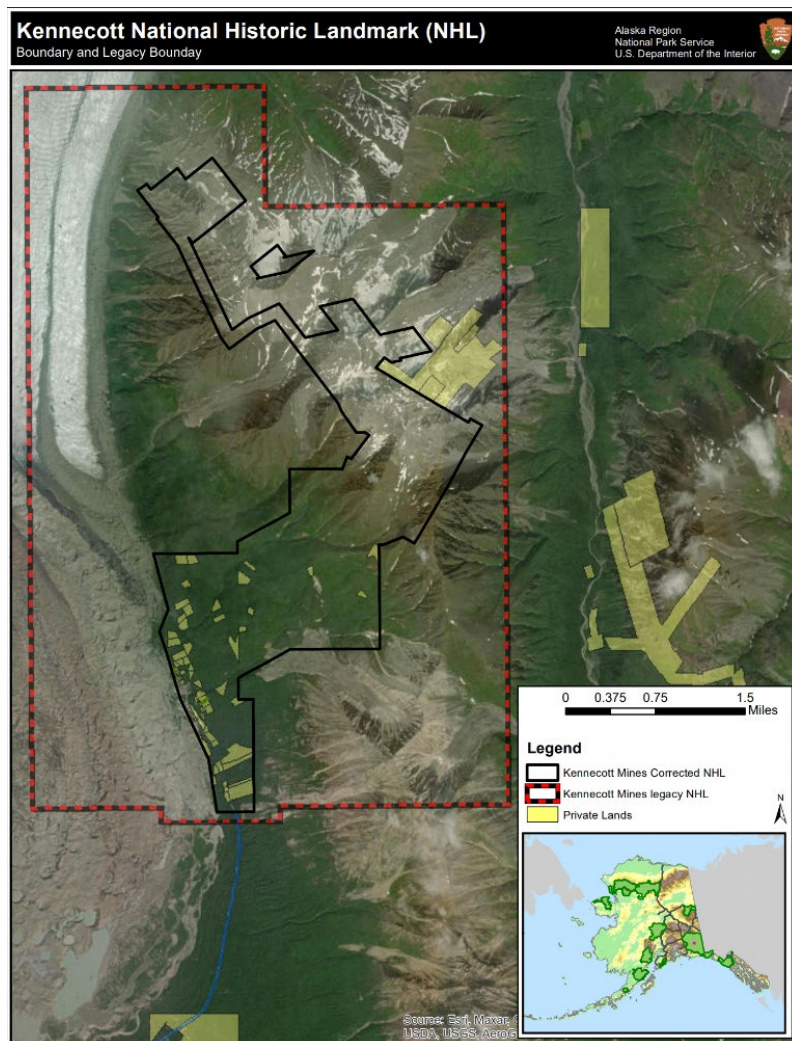


Figure 4 1986 NHL Boundary overlaid with the previously accepted NHL boundary.

### What changes with this new knowledge of the legal boundary?

On balance, most things stay the same because the majority of land administratively removed from designation is NPS land, with all its laws of protection. Additionally, previous planning efforts remain valid for cultural and natural resource protection purposes, although maps and materials will need to be updated. Recall from above, the NHL is a designation that focuses management attention and provides opportunities for private landowners to receive funding. One private landowner no longer has that opportunity for a portion of their land; however, all other private landowners' status remains the same. Of course, the opportunity remains for community members and the park to envision a new boundary at any time and nominate it.

### What is the difference between land that is within the WRST boundary and land within the Kennecott Mines NHL boundary?

NPS owned lots within the Kennecott Mines NHL, like NPS managed lands within WRST, are



managed by the NPS and are subject to all laws, policies, and guidance relevant to the NPS and WRST's enabling legislation. However, the NPS owned lots within the Kennecott Mines NHL are recognized to be of national historic importance and there are higher standards for preservation and potentially different funding sources for historic preservation within the NHL.

**There is a Kennicott Subdivision within the designated NHL. How many Kennicott Subdivision Units are there?**

In September 1976, The Great Kennicott Land Company (GKLC) established the Kennicott Subdivision, which subdivided lands formerly owned by the Kennecott Copper Corporation into residential lots within five units including the Bonanza, Erie, Jumbo, Mother Lode, and Millsite units.

**Do you have a map to help visualize the Kennicott Subdivision Units and highlight NPS lots?**

**Yes.** Please see below.

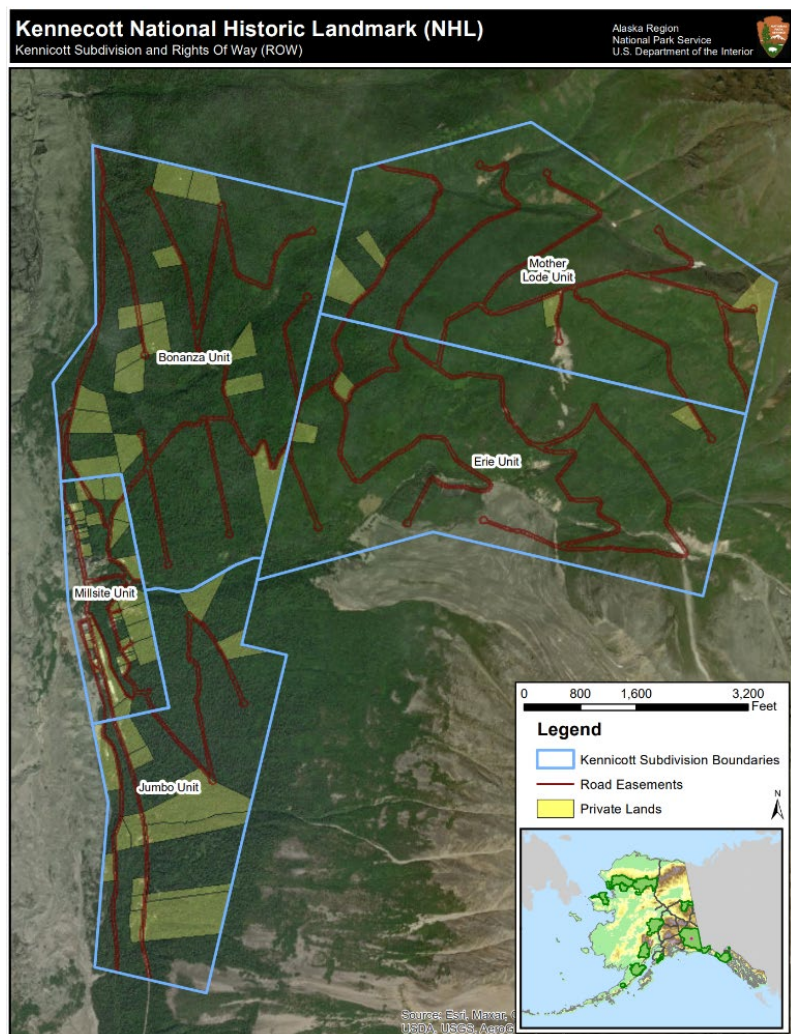


Figure 5 Map of the Kennicott Subdivision, highlighting land ownership type.

**Is the shuttle turnaround on an NPS managed lot within the Kennicott Subdivision? Which Unit?**

**Yes.** The shuttle turnaround is on an NPS owned lot within the Millsite Unit of the Kennicott Subdivision.

**I've heard about an ACC. What does ACC stand for and what is it?**

ACC stands for Architectural Control Committee. The ACC originates from the covenants of the Kennicott Subdivision Millsite Unit. The Millsite Unit, which encompasses historic properties associated with the former Kennecott mill town, was subdivided into 91 lots. These lots are subject to 20 articles of “restrictions, conditions, covenants and agreements” codified in the Declaration of Restrictions (DOR) for the Millsite Unit of the Kennicott Subdivision, which was legally recorded in the Chitina Recording District on September 29, 1976.

In 1998, the NPS acquired 28 lots in the Millsite Unit and GKLC transferred its three membership positions on the Millsite ACC (see DOR article 15) to NPS. Since that time, two membership positions have been added to the ACC for non-NPS lot owners, and NPS ownership of lots in the Millsite Unit is currently 50 of the 91 lots.

**Is the ACC a NPS organization?**

**No.** The ACC is a community organization, originating from covenants of the Kennicott Subdivision Millsite Unit.

## **Frequently Asked Questions: KOP Review**

**Where can I find information about actions identified in the 2013 KOP?**

There are two relevant documents, the 2013 KOP FONSI, and the Action Items Review document. The 2013 KOP FONSI is the decisional document for the KOP and contains a list of all actions identified in the plan, and the Action Items Review document (which is attached to the same email as this letter) details the status of every action item listed in the FONSI.

- [2013 KOP FONSI 11-29-13 \(nps.gov\)](#)

**What is the difference between the Review and the Revision?**

The 2013 KOP directs WRST to review the plan every five years, with a focus on any discrepancies between the plan and its implementation. The Review also provided an opportunity to address other issues that have developed since the plan was released. This document is part of that review. The Revision is the process of updating the plan to reflect current and desired future conditions. The Revision will have multiple opportunities for public input, beginning in summer 2023.

**What has/hasn't been accomplished as identified in the KOP?**

Many actions have been completed from the KOP, some are in process, and some have not yet been addressed. Major accomplishments include: building stabilization is mostly complete; ANILCA local hire authority is in place; National Creek Trestle is restored; multiple NHL buildings are open to the public; implementation of the 2011 Interpretive Concept Plan has begun, specifically with exhibit installations; annual superintendent's letter and regular MAC meeting attendance have improved communication with the community; a multi-building fire suppression and detection system are installed; EMS and SAR response capabilities are improved; warning signage, a Contaminated Site Management Plan, and a Safety Plan protect the public and employees from hazardous materials; and septic tank and leach fields are installed.

Some actions identified in the 2013 KOP have not been completed: an agreement with NHL lot owners and businesses to address NHL road maintenance; marking of the wagon road as primarily a pedestrian trail; walk-in campground; pedestrian trail from NHL to the footbridge over the east fork of the Kennicott River; Millsite water system; or solid waste management system.

Additional detail on the status of all actions identified in the KOP is in the Action Items Review document, which is attached in the same email as this letter.

## **Frequently Asked Questions: Revisions**

### **What is the next step in the Revision process?**

The next step in the Revision process is a public meeting to engage the community and interested parties in actions to be included in the revised KOP.

### **How can I participate in the Revision process?**

You can participate in the Revision process in several ways. There will be multiple public meetings, beginning in summer 2023 and lasting into 2024. There will also be an opportunity to comment on the plan on the NPS's public comment portal, the Planning, Environmental & Public Comment (PEPC) site.

### **How will the Revised KOP be different from the 2013 KOP?**

The Revised KOP will have a smaller geographic scope, largely tied to NPS managed lots in the Kennicott Subdivision. Additionally, Part 1 will be modeled to be more static, identifying broad management goals and concepts that do not need to be reviewed and/or updated regularly. Part 2 will document potential new actions not included in the 2013 KOP that the NPS desires to pursue to a high-level of detail appropriate for public input. It will be organized in a manner that may be easily updated, and additional data gathering, planning, site-design, and compliance will be addressed through separate, tiered documents.

### **I'm concerned about ORV's, e-bikes, horses and other transportation issues. When will these concerns be addressed?**

The NPS will address these concerns through a Revision process beginning summer 2023. Because matters of transportation affect the entire Kennicott Subdivision within the NHL, holistic solutions are needed (see response to public comment in the KOP FONSI).

### **Will there be a next scheduled review once the revision is complete?**

Consistent with NPS policy and practice, no set timeline for a review is required. As significant issues develop, the KOP can always be revisited and revised.

### **What happens to the actions in the KOP that are outside the scope of the revised KOP? How will those issues be addressed now?**

The park understands a need for additional planning efforts in and around Kennecott to address the breadth of issues in the area. Some topics may require specific planning efforts and will be addressed in later planning documents. Some actions need to be reconsidered due to new information, such as the CERCLA remedial investigations. During the KOP Revision public engagement workshops, there will be space for you to share what actions you believe need to be addressed by the NPS. Please share those actions, because even if they aren't within the scope of the revised KOP, they could help set the base for a different planning effort.

**2013 Kennecott Operations Plan FONSI:  
Specific Action Items Review and Summary**  
Completed April 2023

Greetings,

This document describes the status of action items identified in the 2013 Kennecott Operations Plan (KOP) Finding of No Significant Impact (FONSI). The FONSI is a document presenting the reasons why the National Park Service (NPS) concluded there are no significant environmental impacts projected to occur upon implementation of the KOP. The 2013 KOP FONSI is linked here for your reference: [ParkPlanning - FONSI 11-29-13 \(nps.gov\)](https://www.nps.gov/parkplanning/fonsi/11-29-13). The KOP calls for a review of all action items identified in the FONSI every five years; this document is part of that review.

Kennecott is an inherently complicated area with a rich history and mosaic of land ownership. The 2013 KOP attempted to address many issues in and around Kennecott, which led to many different types of actions identified in the document. Because of this, the following list of actions is broad and ranges from discrete and targeted rehabilitation actions to general actions. In providing an update on each action, it is difficult to capture the depth, breadth, and complexity in a concise document. The intention with these updates is full transparency, while aiming for brevity and clarity.

For each action we've indicated if it is complete, if it wasn't completed because we are moving in a new management direction, if the action is partially complete and still in progress, or if it has not been completed for another reason. Certain issues, such as parking, reach across specific actions and will likely require a larger, more focused planning effort in the future. In addition to actions not yet completed, we recognize the tremendous amount of effort that went into completing many of these actions or making substantial progress towards completion. This document was finalized after multiple rounds of input and editing from a multidisciplinary team of NPS staff.

There are several items that were either not addressed in the 2013 KOP or have arisen since the KOP was written that add complexity to management of NPS lands in Kennecott. Off-road vehicles (ORVS) and all-terrain vehicles (ATVs) are one topic not addressed in detail in the KOP that the NPS intends to consider, in conjunction with the community and other interested parties, in the future. Additionally, the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), also known as Superfund, investigations and remediations were not an issue in the 2013 KOP. CERCLA enables agencies to remediate hazardous substances, pollutants, and contaminants in locations with serious hazardous waste problems. The NPS has been thoroughly investigating and addressing CERCLA issues in Kennecott, with the utmost care and consideration for health and safety. This has put several projects and actions on hold while the NPS collects and assesses data.

With many projects identified in the 2013 KOP being completed and new issues arising, it is time to revise the KOP to reflect current management realities and to plan for the future. Because so many actions have been completed, are in the process of completion, or are being re-evaluated, the revised KOP will have a narrower focus appropriate for directed, deliberate actions tied to comprehensive management goals and concepts.

A glossary and acronym list of terms is appended to the end document.

Number	Specific Action Item	Status	Review Conclusion	Future Actions Proposed
<b>Communications</b>				
1	The Superintendent and/or park planner will be responsible for setting annual spring and fall community/public meetings. These will occur prior to Memorial Day and Labor Day and will be held at the Tony Zak Community building. The spring meeting will announce all proposed actions for the upcoming season. The fall meeting will be a review of the season's actions and expectations for the following year. The fall meeting will emphasize what project planning/compliance might occur during the course of the winter and how or when public involvement might occur. Spring and fall meetings will be intended to be brief and primarily informative, encouraging maximum participation.	NPS began to conduct these meetings around 2013, but over time they dissipated. Wrangell-St. Elias National Park and Preserve (WRST, the Park) currently participates in the McCarthy Area Council (MAC) meetings, but no longer holds annual spring/fall meetings. Announcement of proposed actions for the upcoming season is typically included in the annual community newsletter as well.	NPS can update the community on an ongoing and recurring basis, as well as include announcements in the annual park newsletter.	NPS will not proceed with bi-yearly meetings but will continue to update the community on an ongoing and recurring basis, in the annual park newsletter, and as needed.
2	The spring/fall meetings will be supplemented with a series of additional in-depth meetings held in Kennecott/McCarthy during summer months to discuss particular issues of concern. These meetings will be held as needed and advertised at least two weeks in advance. As time and budget allow, these meetings will be structured as working groups in order to share information and open up a productive, conversational dialogue to define issues and brainstorm potential solutions.	Several project specific meetings have been held on an as needed basis.	Supplemental meetings are important to update the community and garner input.	Meetings will be held as needed when issues of concern arise.



Number	Specific Action Item	Status	Review Conclusion	Future Actions Proposed
3	Once every five years, the park will initiate a review of the Kennecott Operations Plan, seeking full community/public input in advance of adopting any revisions to the current plan. These reviews will focus on any discrepancies between the plan and its implementation.	In process.	A five-year review is too static, the plan needs to be more responsive to changing conditions.	This plan will be updated as needed, consistent with NPS policy and practice, and if any significant issues arise, the plan can be revisited. The revision will focus on a more adaptive and nimble process.
4	A park leadership team member will attend each MAC meeting. The park leadership team generally consists of the park superintendent and the division chiefs.	Ongoing.	Park leadership attendance at MAC meetings is an important component in maintaining communications between the NPS and community.	Park leadership will continue to attend MAC meetings.
5	Provide a web-based educational component regarding projects at Kennecott. This will include a generalized overview of how projects are entered into the budget system, and where and when project design, contracting, and NEPA and NHPA compliance occurs. Identify points in the process where there are opportunities for public involvement. These materials will be posted on the park's website and on the Friends of Kennicott website.	Ongoing. The park has web pages focused on Kennecott in general, CERCLA, and a link to Planning, Environment, and Public Comment (PEPC), an NPS webpage. Currently the Friends of Kennicott (FoK) webpage is broken. (FoK Board Chair, has been made aware of the website issue.)	Posting information on the website continues to provide updates and communication to a broad array of people interested in NPS Kennecott operations.	NPS's web-based efforts will continue.
6	Continuation of the annual Superintendent's letter	Ongoing. This has been completed and continues.	The annual community newsletter is another way to maintain communications with the community.	The annual community newsletter will continue annually or biennially.
<b>Transportation/Access</b>				

Number	Specific Action Item	Status	Review Conclusion	Future Actions Proposed
7	Shuttle van pick up and drop off will continue at the current location (between the Blackburn school and St. Elias Alpine Guides office) with occasional overflow pick-up and drop-off at the shuttle turnaround.	The shuttle system continues under a variety of vendors. In 2022 the park requested Commercial Use Authorizations (CUAs) for shuttles wishing to turn around on NPS owned lot(s).	This will require additional NPS consideration and planning.	NPS will consider this in a future, transportation-specific plan.
8	To provide the best visitor orientation, the shuttle turnaround will be linked via a raised boardwalk to the Blackburn school. The existing deck behind the Blackburn school will be expanded and roofed to provide a covered seating area. A bulletin board will be installed in this area. The existing outhouse will be expanded to provide men's and women's vault toilets. Additionally, there will be some identifying feature visible to those getting off shuttle vans that identify the Blackburn building as an NPS facility.	Partially complete. The boardwalk was completed in 2016. The deck was expanded and roofed. A bulletin board was installed. Benches have been installed. The outhouse project is no longer being considered.	The shuttle drop off should be easily identifiable to visitors, with NPS infrastructure clearly defined.	NPS will maintain existing infrastructure. Expanding the outhouse will not be considered due to topography concerns. As an alternative, a septic pumper truck will be considered.
9	NPS will avoid parking in the space north of the Blackburn building	Ongoing. The parking and shuttle situations have changed since the FONSI; however, NPS continues to follow this action as best as possible. There is a parking section with additional actions below.	This action likely needs to be more specific, with mechanisms in place to discourage parking in the area (ex. signs).	NPS will continue to avoid parking in this space.

Number	Specific Action Item	Status	Review Conclusion	Future Actions Proposed
10	Access to the millsite subdivision is predominantly through shuttle services and non-motorized means. Vehicle access and parking will be managed to minimize impacts to visitors and residents, minimize congestion and maximize safety.	Ongoing. Local shuttles are utilized but not currently operating under commercial use authorizations (CUAs). In 2022 the park requested CUAs for shuttles wishing to turn around on NPS owned lot(s).	Parking, driving, and shuttle issues exist together and need to be addressed together and not separately.	This will be addressed in a future transportation-specific plan. NPS will continue to manage vehicle access and parking as appropriate and will continue to support the intent of this action item (maintaining access through shuttles and pedestrian use).
11	Educational materials will be developed in consultation with community members. Signage should be minimized and aimed at effective conveyance of information. Land status maps that clearly show intermixed land pattern will be used. Signs can include “bullet statement” messages. Kiosks with signs meeting these standards have been installed at the footbridge and the airport. Signs placed on NPS lands will conform with the Sign Guidance identified in the Cultural Landscape Report.	Ongoing. NPS has been working to develop an appropriate and efficient process that integrates public input and that meets all regulatory requirements. This is an ongoing and evolving process.	There may be more current guidance than the Sign Guidance identified in the CLR. The 2015 "Visual Communications Guidelines" for the Kennebec National Historic Landmark (NHL) is distinct from the 2001 CLR.	Signs placed on NPS lands will conform with the most recent guidance. NPS will continue to develop public information materials with community members.
12	Brochures: to be developed in partnership with community. Should include information on the following: Why this place is different. This is a community; respect that there are people walking on the roads, it is a shared trail. Describe physical characteristics that lead to safety concerns. Encourage the use of shuttle services and alternatives.	Ongoing. NPS has collaborated with community members to help develop public information materials. A new brochure is in development.	The brochures are an opportunity to work with the community to explain safety information, the wonder of Kennebec, and to provide information regarding alternative transport to visitors and potential visitors.	NPS will continue to develop public information materials with community members.

Number	Specific Action Item	Status	Review Conclusion	Future Actions Proposed
13	Brochures to be distributed at Sportsman shows, to motorized groups and other outreach opportunities, including Fairbanks (to reach dipnetters). Also distributed around Westside/McCarthy/Kennecott and by businesses.	Ongoing. NPS typically attends the annual sportsman show and distributes educational material to visitors there, as well as locally in the Kennecott/McCarthy community.	The park has engaged with various user groups and disseminated park information via educational brochures.	The park will continue to share updated information regarding Kennecott to various user groups using educational brochures.
14	Websites: Can display information similar to brochures. Visitors use websites for trip planning.	Ongoing. Shuttle information is provided on the park's website, in the park newspaper, by phone, and during in-person contacts. The park also posted a news release on the website regarding parking and shuttles in 2021 and 2022.	Information on the website has the potential to reach a wide variety of users, visitors, and potential visitors.	NPS's web-based and other efforts will continue.
<b>Parking</b>				

Number	Specific Action Item	Status	Review Conclusion	Future Actions Proposed
15	Provide limited (10-space) designated parking in the dairy barn area. Users to include handicapped; local use for non-shuttle times; special events; visitors; and lot owners with no property access. Additionally, NPS has established and will continue to maintain a parking area for employees and contractors near the Dairy Barn. NPS will run a shuttle for employees that live on the West Side or McCarthy but work in Kennecott, so as to minimize park vehicle traffic.	The Dairy Barn parking area is functional but not operational as designated for public parking. The terrace needs to be leveled by adding significant fill. In keeping with the July 2022 News Release, on NPS lands in the NHL, parking is allowed only at the shuttle turnaround located next to the Kennecott Visitor Center. Parking on NPS lands elsewhere in the NHL is prohibited except for Federally qualified rural Alaska residents engaged in permitted subsistence activities. Interpretive staff use a shuttle. This is hoped to be expanded to more staff in 2023.	More shuttle opportunities should be provided to NPS staff who commute to Kennecott. NPS should continue to follow the statements from the July 2022 News Release.	Parking will be addressed in a future transportation-specific plan, along with other short-term efforts to encourage shuttle usage for NPS employees commuting to Kennecott.
16	Consider options for a pedestrian trail from the designated public parking in the Dairy Barn area to the shuttle bus turnaround or Blackburn school area.	Not complete. There is an existing social trail that is predominantly used by Kennicott Glacier Lodge employees.	Parking in Kennecott is still a planning issue; once the issue is resolved, a trail from that location could be considered.	A more formal trail will be considered in future site/transportation planning.
17	When access to private property is restricted due to winter conditions, Kennecott landowners will be free to park on the main rights-of-way within Kennecott.	Private landowners typically park wherever they can when access is restricted due to winter conditions.	This can be removed from the KOP and addressed in future transportation planning efforts.	This will be addressed in a future transportation-specific plan.

Number	Specific Action Item	Status	Review Conclusion	Future Actions Proposed
18	The park will work with the local community to support an efficient public shuttle system and adequate hours of operation, to reduce the need for parking within the NHL.	Partially complete and ongoing. Local shuttles are utilized. In 2022, the park requested CUA applicants to provide shuttle services.	A public shuttle system, appropriately authorized, could reduce the need for parking personal vehicles in the NHL.	This will be addressed in a future transportation-specific plan.
19	The park will develop a public education campaign through the park's website, signs, and brochures at information kiosks in Kennecott/McCarthy and along the McCarthy Road, informing the public of the local shuttle system and the lack of public parking in the NHL.	Partially complete and ongoing. Shuttle information is provided on the park's website, in the park newspaper, by phone, and during in-person contacts. The park also posted a news release on the website regarding parking and shuttles in 2021 and 2022. Some of these topics are still unresolved, which has made communication difficult. For instance, messages conveyed in the 2021 and 2022 news releases contrasted with one another due to changing conditions.	Changing conditions have made it difficult to provide consistent information in the past.	NPS's web-based efforts will continue and the park will continue to encourage alternative transportation to Kennecott.

Number	Specific Action Item	Status	Review Conclusion	Future Actions Proposed
20	No parking at the shuttle turnaround (after a parking spot is designated).	<p>Although this space is designated as a shuttle turnaround, it is also utilized as a parking lot. Until an alternative parking lot is designated, as per the July 2022 NPS Press Release, on NPS lands in the NHL, parking is allowed only at the shuttle turnaround located next to the Kennecott Visitor Center.</p> <p>Parking at the Dairy Barn has been for NPS vehicles only and specific Kennicott Subdivision property owners who cannot access their property with their vehicle. In 2021, the NPS solicited feedback on parking needs from lot owners.</p>	This action can be removed from the KOP and addressed in future transportation planning efforts. Private parking on public lands requires authorization	NPS will address this action in future transportation planning.
21	No parking on NPS owned portions of easements in the millsite subdivision.	Parking is prohibited beyond the shuttle turn around per signage installed at the turn around. Parking is prohibited per authority under 36 CFR 4.12, Traffic Control Devices.	This action can be removed from the KOP and addressed in future transportation planning.	NPS will address this action in future transportation planning. NPS will continue to follow 36 CFR 4.12.
22	Utilize restored features (boardwalks, railroad rails) to discourage parking.	Not complete. No actions have been taken to utilize restored features to discourage parking.	This action can be removed from the KOP and addressed in future transportation planning efforts.	NPS will address this action in future transportation planning.

Number	Specific Action Item	Status	Review Conclusion	Future Actions Proposed
23	A 10-mph speed limit will be posted through the Kennecott subdivision, posted at the NHL boundary.	Complete. A 10-mph speed limit sign has been posted and a regulation in the Superintendent's Compendium was added to establish a 10-mph speed limit.	This action can be removed from the KOP.	Following rules, regulations, and authorities the NPS will continue to enforce the 10-mph speed limit through NPS owned portions of the Kennicott Subdivision.
<b>Roads/Trails</b>				
24	Subdivision easements within the NHL: A cooperative agreement will be sought with NHL lot owners and businesses to address NHL road maintenance.	Not complete. No cooperative agreement has been established to address NHL road maintenance.	Communication between lot owners and businesses remains a top priority for NPS. This action can be removed from the KOP and addressed in future transportation planning efforts.	NPS will re-evaluate in future transportation planning.
25	Wagon Road: Segments of the Wagon Road that occur on NPS lands will be managed primarily as a pedestrian trail, with allowance for motorized use for those accessing private property along the trail and for federally qualified subsistence users engaged in subsistence activities.	Not complete. The Wagon Road is currently being utilized in this manner, but could be maintained or more formalized to better meet the spirit of this action item.	Formalization of the Wagon Road could provide additional recreation and subsistence opportunities.	NPS will re-evaluate in future transportation planning.
26	Toe of the Kennecott Glacier Road: This road traverses private land, university sub-division lands, and finally NPS lands. The NPS portion of this road will be designated a park road, open to motorized use. Motorized travel on NPS lands off the designated road will only be allowed for federally qualified subsistence users engaged in subsistence activities.	The NPS owned portion of the road has not been designated as a park road. However, no designation is needed as it meets the definition of a park road and is currently being managed as a park road.	This action can be removed from the KOP and addressed in future transportation planning efforts if needed.	NPS will continue to manage this as a park road.



Number	Specific Action Item	Status	Review Conclusion	Future Actions Proposed
27	NPS will construct a 3.5-mile pedestrian trail to the NHL from the footbridge over the east (dry) fork of Kennicott River. The route will generally follow the east side of the Kennicott Glacier, staying well away from private property, from the viewshed of the railroad corridor, and from popular swimming areas at the toe of the glacier. At the north end, the foot trail will connect with the old Wagon Road in the vicinity of the West Bunkhouse or Company Store. The trail will be constructed and maintained exclusively for non-motorized use.	Not complete. Trail construction has not occurred. A community member submitted this project to Rivers, Trails, and Conservation Assistance (RTCA) and NPS has conducted reconnaissance and preliminary assessments for where the trail would be on-the-ground and alternative construction methodologies have been prepared.	This trail is currently being re-evaluated as proposed.	NPS will continue to seek planning and design funding and include this project in work plans, as workforce capacity allows.
<b>NPS Utilities and Infrastructure</b>				
28	Mill Site Water System The design for the water system is still underway and the Kennecott Operations Plan/EA will not serve as the NEPA compliance document for the water system.	Partially complete, on hold. There is an intake system in the Bonanza Unit, and a partial water system is in place in the millsite unit. Plans to expand the water system were placed on hold due to ongoing CERCLA remedial investigations.	This action was not considered in detail and needs to be considered in a separate compliance document.	With ongoing CERCLA remedial investigations, this may not be an appropriate action for NPS to pursue. NPS will reconsider when CERCLA remedial investigations are complete.

Number	Specific Action Item	Status	Review Conclusion	Future Actions Proposed
29	<p>Sanitary Sewer System Collection, treatment and disposal of sewage (wastewater) generated by visitors and staff in NHL buildings and on the west side of Kennicott River will be achieved primarily by septic systems (septic tanks and leach fields). The NHL buildings that could potentially be equipped with sewer service are the Dairy Barn, Old School, New School, West Bunkhouse, and Company Store. The existing Alaska Department of Environmental Conservation (ADEC)-approved septic system and leach field has been expanded to service the Dairy Barn property acquired by the park in 2005. The Company Store, West Bunkhouse, New School, Old School and Dairy Barn will be serviced by this system leach field. Excavations will be made along the west side of the site behind the Company Store and under the historic wagon road. About 1,050 lineal feet of buried sewer line from the Company Store to the Dairy Barn will be installed. Sewage lift station(s) may be required. The lift station will be installed in a buried manhole in the line between the Company Store and Dairy Barn. A total of 6-8 manholes will be constructed.</p>	Not complete, on hold. The sewer system has not been completed and NPS has placed this project on hold during CERCLA remedial investigations.	This is a large undertaking, and with ongoing CERCLA remedial investigations, may not be an appropriate action for NPS to pursue.	NPS will reconsider when CERCLA remedial investigations are complete.
30	<p>Vegetation clearing will be done around all historic structures on NPS lands, for fire and windfall protection, and for safe access and egress to and from the buildings.</p> <ul style="list-style-type: none"> <li>• Clear all spruce within 30' of all structures.</li> <li>• Limb spruce trees up to 10' above the nearest surface fuel within 100' of all structures.</li> <li>• Clear all woody vegetation within 5' of all structures.</li> <li>• Selectively clear or plant other vegetation to maintain quality viewsheds.</li> </ul>	Ongoing. Facilities has taken the lead on this due to greater on-site staff capacity.	Staff capacity remains an issue in completing this action.	This action may be reconsidered in a future fire management plan. Facilities will continue to complete this action to the best of their abilities considering staffing constraints in the meantime.

Number	Specific Action Item	Status	Review Conclusion	Future Actions Proposed
31	<p>Invasive Plant Management</p> <ul style="list-style-type: none"> <li>Continue physical control methods where effective.</li> <li>Allow limited use of herbicides to control infestations not responding to physical control methods.</li> </ul> <p>Implement mitigating measures with best management practices and monitoring of overall program effectiveness and environmental effects.</p>	<p>Partially complete, ongoing. WRST currently lacks staff capacity for proactive invasive plant work. Vegetation work is limited to trail maintenance and limited removal of hazardous fuels near flammable structure, both led by Facilities due to greater on-site staff capacity.</p>	<p>Staff capacity remains an issue in completing this action.</p>	<p>NPS will continue to manage removal of hazardous fuels near flammable structures at the least, with the potential for proactive invasive plant management work if additional capacity is created.</p>
32	<p>Where needed, native vegetation may be planted to screen modern NPS facilities using native seeds/cuttings from local populations. In some selective cases historically accurate non-invasive non-native plants may be planted to enhance the cultural landscape.</p>	<p>Not complete. Currently WRST has no staff capacity for this, nor are there any prospects for future capacity.</p>	<p>Staff capacity remains an issue in completing this action.</p>	<p>This action will likely not be completed until greater staff capacity is reached.</p>
<p align="center"><b>Administrative Core Zone</b></p>				
33	<p>Circulation/Access</p> <p>Improvement and maintenance of a pedestrian trail from the General Manager's Office (GMO), up the creek to the footbridge, connecting to the top of the mill building. This trail will connect with the old Wagon Road and Silk Stocking Loop described in the Residential A Zone.</p>	<p>Complete, ongoing. The trail is in decent shape and brushing operations are on a cyclic schedule.</p>	<p>This action has been completed and continues to be maintained. It is an important connection between the old Wagon Road and the Silk Stocking Loop.</p>	<p>NPS will continue to manage the trail on a cyclic schedule.</p>

Number	Specific Action Item	Status	Review Conclusion	Future Actions Proposed
34	<p>General Manager's Office</p> <ul style="list-style-type: none"> <li>Stabilization: Cyclic maintenance. For most preserved or rehabilitated historic structures, cyclic maintenance means repairs to roofing, windows (re-caulking), and re-painting on a 5 – 10 year cycle.</li> </ul> <p>Small scale features: Reconstruction of boardwalk and stairs from GMO to Hancock addition.</p>	<p>Partially complete, ongoing. Cyclic maintenance is ongoing. Projects need to be developed and funded for the possible reconstruction of boardwalk and stairs from GMP to Hancock addition.</p>	<p>Many structures have been identified for stabilization and cyclic maintenance while others have been identified and managed as ruins. Structures identified for stabilization and cyclic maintenance require no further action unless noted.</p>	<p>NPS will continue to manage stabilization according to the Secretary of the Interior's Standards for the Treatment of Historic Properties. NPS will continue to pursue funding for incomplete components of this action.</p>
35	<p>Hospital</p> <p>Stabilization: Implement interior false-work to keep walls, floors and roof from collapsing. Maintain a roof. No interior access proposed. No painting proposed.</p>	<p>Partially complete, on hold. This work has been completed on the west portion of the hospital, and several portions were removed in 2010 due to public safety concerns. The east portion is slowly collapsing and there are ongoing conversations to determine if the east side is eligible for removal under a Time Critical Removal Action (TCRA), a CERCLA program.</p>	<p>NPS should place any actions regarding the east portion on hold pending determination of eligibility under TCRA.</p>	<p>NPS will continue to manage stabilization on the western portion of the hospital according to the Secretary of the Interior's Standards for the Treatment of Historic Properties.</p>
36	<p>Assay Office</p> <p>Stabilization: Move salvageable remains of the building back to its original location.</p>	<p>Complete.</p>	<p>This action can be removed from the KOP.</p>	<p>NPS will continue to manage stabilization according to the Secretary of the Interior's Standards for the Treatment of Historic Properties.</p>

Number	Specific Action Item	Status	Review Conclusion	Future Actions Proposed
37	Railroad Depot Stabilization: Cyclic maintenance. Restore electrical systems.	Partially complete. The stabilization is complete, but the electrical systems have not yet been restored.	This action can be removed from the KOP.	NPS will continue to manage stabilization according to the Secretary of the Interior's Standards for the Treatment of Historic Properties. NPS will continue to work towards the uncompleted actions.
38	<p>Company Store</p> <ul style="list-style-type: none"> <li>Stabilization: Work to include: Level 1—construct public restrooms, complete field lab area, interior finishes, lights, elevator/lift to Level 2 and 3, install utilities and additional furnaces. Level 3—construct staff office area, interior finishes, lights and communications. Maintain as visitor contact point and administrative office space.</li> <li>Interpretation: Maintain as primary exhibit space with visitor access. To minimize interpretive intrusions in the town, the Company Store will provide a central interpretive focus and a place to fully develop the landmark's primary stories. Given the need for durability and low maintenance, the full range of exhibit techniques can be used including hands-on and interactive media. Replicate original Post Office and General Store sign and open the post office for general public access.</li> </ul> <p>Small scale features: Maintain Hoist House #52. Clear random building material from interior, strong interpretive value. Re-establish crib wall/utilidor from Company Store to the end of the Carpenter's Shop.</p>	<p>Partially complete, on hold.</p> <p>Portions of the stabilization work are in progress. The scope of work has changed significantly and needs additional reconsideration due to ongoing CERCLA remediation investigations.</p> <p>Interpretive exhibits were completed in 2018.</p> <p>The crib wall is complete.</p> <p>The basement was retrofitted into office space, SAR cache, and other administrative additions. This was completed under adaptive re-use, meaning the building can revert to its original use.</p>	<p>Portions of the stabilization, including the restroom, lab, elevator, and furnaces, should be placed on hold pending completion of CERCLA remedial investigations.</p>	NPS will continue to manage stabilization according to the Secretary of the Interior's Standards for the Treatment of Historic Properties where appropriate. NPS will reconsider when CERCLA remedial investigations are complete.

Number	Specific Action Item	Status	Review Conclusion	Future Actions Proposed
39	Railroad Trestle Stabilization: Minor finish work such as closing up utilidor. Cyclic maintenance.	Complete, ongoing. The utilidor covers have been installed.	The utilidor covers will be managed under cyclic maintenance. This action can be removed from the KOP.	NPS will continue to manage stabilization according to the Secretary of the Interior's Standards for the Treatment of Historic Properties.
<b>Industrial Core Zone</b>				
40	Circulation/Access <ul style="list-style-type: none"> <li>Construct accessible trails and boardwalks behind the power plant, machine shop, and leaching plant.</li> </ul> In cooperation and consultation with private lot owners, consider restoration of boardwalks and/or railroad within this zone as a tool to control parking.	On hold. Further trail and boardwalk construction is on hold due to ongoing CERCLA remediation investigation and any restoration of boardwalks or railroad needs to be discussed further with property owners and the ACC.	This action will be reconsidered pending ongoing CERCLA remediation investigations.	Trail and boardwalk construction will be addressed once CERCLA remediation is complete. A treatment plan for the CLR is close to finalization, which will guide work to be completed and will focus on increased community involvement.
41	Tram Terminus Stabilization: Work to include structural repairs to the upper mill including the tram deck, structural reinforcement to ore bin, floor repairs, and reconstruction of upper tram deck and roof. Dependent on funding, construction of a protective roof structure over the upper tram deck and roof may be considered rather than reconstruction.	Complete as modified. Scope of Phase III contract was modified and the tram deck and roof were not rehabilitated. The ore bin is complete. A 12-foot section or roof was extended over the ore bin.	This action was modified and is complete as modified. It can be removed from the KOP.	NPS will continue to manage stabilization according to the Secretary of the Interior's Standards for the Treatment of Historic Properties.

Number	Specific Action Item	Status	Review Conclusion	Future Actions Proposed
42	<p>Concentration Mill</p> <ul style="list-style-type: none"> <li>Stabilization: Work to include structural repairs including foundation repairs and column and truss repairs Level 1 through 7. Repairs to the mill to repair the foundations and reestablish deteriorated timber crib retaining walls will require site disturbance during the period of construction. Once completed, the landscape will be restored. Additional work dependent on funding will include structural repairs to the mill structure at Levels 8 and above. This work will include foundation and column and truss repairs, new roof construction, and stabilization of the ore bins. The intent of the proposed work is to stabilize the structure for a guided visitor opportunity. Long term plans will include siding repairs and replacement and painting. Window repairs and replacement may be required to protect the interior of the building and to provide draft control as part of future fire suppression within the mill.</li> </ul> <p>Small scale features: Replace ore chute. Track inclines on north and south sides of the mill building will be brushed or otherwise cleared and managed as ruins; reconstruction of roof enclosure will occur on the utilidor along the south edge of the mill building. Internal stabilization of scale house and lab sheds.</p>	<p>Partially complete, on hold. A small amount of siding was repaired on the North wall at Level 7. The only landscaping was between the Hancock Addition and the lower ore bin on the south side.</p> <p>The ore chute is complete. Significant brushing has been done but there is much more to do. Utilidor has not been enclosed.</p> <p>The Scale house foundation is complete and roof work has been funded and will be complete in FY22/23.</p>	<p>Portions of this action are complete and the existing actions will be reexamined pending ongoing CERCLA remediation investigations.</p>	<p>NPS will continue to manage stabilization according to the Secretary of the Interior's Standards for the Treatment of Historic Properties. NPS will continue to work towards the uncompleted actions and compete for funding, pending ongoing CERCLA remediation investigations.</p>

Number	Specific Action Item	Status	Review Conclusion	Future Actions Proposed
43	<p>Leaching Plant</p> <ul style="list-style-type: none"> <li>Stabilization: Ongoing work to include repairs to halt collapse onto the railroad corridor, site stabilization, foundation replacement, repairs to floor and wall structure, lead paint mitigation (including painting), rehabilitation of doors and windows to control access. Scheduled work includes structural repairs to the walls of the leaching plant including column realignment and footings, shear wall repairs, truss repairs, and asbestos abatement. Allow south addition to collapse and manage as a ruin. Implement interior false-work/rigging to keep ruin structure from collapsing onto the railroad corridor or into the north addition. No interior access proposed in the south addition.</li> </ul> <p>Small scale features: Stabilization/reconstruction of bracing and the original track incline for the leaching plant deck, north of leaching plant. Reestablish the deck at the north elevation with an integrated accessibility ramp into the sacking shed.</p>	<p>Partially complete, on hold.</p> <p>The South addition is being managed as a ruin.</p> <p>Most structural work along road corridor is complete and the wall between the South and North Sacking Sheds will be rehabilitated in FY22/23. The ruin portion needs to be cut loose from the rehabilitated section where they meet.</p> <p>The Northwest corner and West wall need rehabilitation before this work can commence.</p>	<p>Further work is on hold pending ongoing CERCLA remediation investigations.</p>	<p>NPS will continue to manage stabilization according to the Secretary of the Interior's Standards for the Treatment of Historic Properties. Other rehabilitation work will be addressed once CERCLA remediation investigations are complete.</p>
44	<p>Machine Shop</p> <p>Stabilization: Scheduled work to include reestablishment of collapsing service decks on north and south sides, door and window repairs, siding repair, and reconstruction of a porch roof over the east entrance.</p>	<p>Mostly complete, in progress. The South deck is complete, the North deck is mostly complete. The pipe shed that was moved to rehabilitate the north deck and crib wall is planned to be reassembled in FY22. Window repairs the on East wall are complete. The North wall needs window repairs and paint.</p>	<p>NPS has made substantial progress toward this action and will continue to work toward full completion.</p>	<p>NPS will continue to manage stabilization according to the Secretary of the Interior's Standards for the Treatment of Historic Properties. NPS will continue to work towards the uncompleted actions.</p>



Number	Specific Action Item	Status	Review Conclusion	Future Actions Proposed
45	<p>Power Plant</p> <ul style="list-style-type: none"> <li>Stabilization: Remediate oil and asbestos in the area. Boiler and stack preservation treatment. Window repair/lead abatement including painting.</li> </ul> <p>Small scale features: Stabilization of structure members (those affected by fire on the south deck of the power plant); reconstruct small section of boardwalk with stairs west of power plant.</p>	<p>Partially complete, on hold.</p> <p>Oil and asbestos remediation has been performed but is not complete due to failing /incomplete containment. Stack preservation has been applied. Exterior surfaces have been repaired and painted.</p> <p>All small-scale feature work is on hold due to ongoing CERCLA remediation investigations.</p>	<p>NPS has made progress on this action, but further steps have been placed on hold pending CERCLA remedial investigations.</p>	<p>NPS will continue to manage stabilization according to the Secretary of the Interior's Standards for the Treatment of Historic Properties. Other rehabilitation work will be addressed once CERCLA remedial investigations are complete.</p>
46	<p>Transformer House</p> <p>Stabilization: Repair or replace missing windows and doors and paint. Landscape to improve drainage away from building.</p>	<p>Partially complete, on hold.</p> <p>Exterior surfaces were painted in 2021. Windows and doors are currently being completed. A drainage plan needs to be discussed further.</p>	<p>This action is partially complete, with further steps placed on hold pending CERCLA remedial investigations.</p>	<p>NPS will continue to manage stabilization according to the Secretary of the Interior's Standards for the Treatment of Historic Properties. Other rehabilitation work will be addressed once CERCLA remedial investigations are complete</p>
<b>Commercial Zone</b>				

Number	Specific Action Item	Status	Review Conclusion	Future Actions Proposed
47	<p>Refrigerator Plant</p> <ul style="list-style-type: none"> <li>Stabilization: Cyclic maintenance. Re-construct cribbing walls.</li> </ul> <p>Small scale features: Restore historic ramp to the railroad corridor. Restore boardwalk.</p>	<p>Partially complete, in progress. The crib wall is complete.</p> <p>The ramp from rail grade needs to be rehabilitated. A project has been written but has yet to be funded.</p>	<p>A portion of this project is complete, and NPS plans to complete this action once funding is solidified.</p>	<p>NPS will continue to manage stabilization according to the Secretary of the Interior's Standards for the Treatment of Historic Properties. NPS will continue to seek funding to complete this action and include this project in work plans, as workforce capacity allows.</p>
48	<p>West Bunkhouse</p> <p>Stabilization: 2013 work included exterior rehabilitation consisting of floor and wall repairs, construction of exterior shear diaphragm, siding repair and painting, repairs to doors and windows. Retain interior options for potential partnerships and/or interpretation. Depending on the nature of future partnerships and the adaptive re-use of this building, it may be necessary to make significant changes to the building to protect occupants from fire, to meet operational needs of users, and to install electrical, heating and plumbing services.</p>	<p>Partially complete, in process. The space has been utilized as storage. A project was submitted and is competing for funding to remediate hazardous materials issues. There is no current plan for heating, plumbing, converting to partnership use.</p>	<p>Depending on the outcomes of the hazardous materials remediation, NPS would consider opening the second floor to the public.</p>	<p>NPS will continue to seek funding to complete this action and include this project in work plans, as workforce capacity allows.</p>
49	<p>New Schoolhouse</p> <ul style="list-style-type: none"> <li>Restore classrooms after maintenance activity is removed from the building. Install chalk boards, refinish floors.</li> </ul> <p>Small scale features: Re-establish cribwall/utilidor between New School and West Bunkhouse.</p>	<p>Partially complete, in progress. Classrooms have not been restored.</p> <p>The cribwall/utilidor has been re-established.</p>	<p>NPS has completed portions of this action and plans to complete the rest once funding is secured.</p>	<p>NPS will continue to manage stabilization according to the Secretary of the Interior's Standards for the Treatment of Historic Properties. NPS will continue to seek funding to complete this action and include this project in work plans, as workforce capacity allows.</p>

Number	Specific Action Item	Status	Review Conclusion	Future Actions Proposed
50	<p>Recreation Hall</p> <ul style="list-style-type: none"> <li>Stabilization: Cyclic maintenance. Install sprinkler system. ADA compliant hardening of walkways to outhouses.</li> <li>Partnerships: Completed lease agreement with Wrangell Mountain Center to manage the building for community events, interpretive programs, and classroom purposes.</li> </ul> <p>Small scale features: Hose house was rehabilitated and will be utilized to provide storage for fire suppression supplies.</p>	<p>Complete.</p> <p>Stabilization work is complete.</p> <p>The lease agreement with Wrangell Mountain Center is still in place.</p> <p>The hose house rehabilitation is complete but is currently not being used to store fire suppression supplies.</p>	<p>NPS has completed this action. It can be removed from the KOP.</p>	<p>NPS will continue to manage stabilization according to the Secretary of the Interior's Standards for the Treatment of Historic Properties. NPS will continue to make the facility available for leasing into the future.</p>
51	<p>Old Schoolhouse</p> <ul style="list-style-type: none"> <li>Stabilization: Cyclic maintenance. Utilize boardwalk behind the building to connect this building with the shuttle turnaround, thus providing a continuous visitor orientation space. Porch behind building will be extended and roofed. Benches installed to provide covered visitor space. Existing outhouse expanded to provide men's and women's vault toilets.</li> </ul> <p>Interpretation: Convert the old schoolhouse into a staffed contact station offering backcountry information, orientation, and safety messages. Possible space dedicated to concessioner who offers guided tours through Kennecott NHL. Install interpretive panels that introduce each of the landmark's themes and that interpret the old schoolhouse building history.</p>	<p>Complete.</p> <p>The boardwalk is complete including a covered area for visitor use. Benches have not been installed. The outhouse project is currently competing for funding and will be rewritten for next funding cycle.</p> <p>The school is being used by staff as a visitor contact station. Interpretive panels have been installed.</p>	<p>This action has been completed apart from bench installation and can be removed from the KOP.</p>	<p>NPS will continue to manage stabilization according to the Secretary of the Interior's Standards for the Treatment of Historic Properties. NPS will continue to seek funding to complete this action and include this project in work plans, as workforce capacity allows.</p>

Number	Specific Action Item	Status	Review Conclusion	Future Actions Proposed
52	Dairy Barn Stabilization: Cyclic maintenance. Future use as a shop/break room and this area will be utilized for employee parking. Enclosure for generator, construct material shed and security shed.	Complete. Work is complete and the building is functioning as planned.	This action has been completed and can be removed from the KOP.	NPS will continue to manage stabilization according to the Secretary of the Interior's Standards for the Treatment of Historic Properties.
<b>Residential A Zone</b>				
53	Circulation/Access The old wagon road from the Company Store through the landslide at the south slope of National Creek will be cleared and maintained for pedestrian use. The landslide will be by-passed or a trail constructed through it.	On hold. Due to additional landslide potential and viability, additional planning is needed.	This action is on hold pending additional research.	This action will be reconsidered due to landslide potential.
54	East Bunkhouse Stabilization: Painting and re-siding with salvaged materials and new "shadow" reconstruction of lower-level windows and doors (openings are framed but do not contain actual doors or windows. Replace roof and stabilize. Re-grading around building. This building is critical to maintain in place for National Creek stability.	This stabilization work is complete.	This action is complete and can be removed from the KOP.	NPS will continue to manage stabilization according to the Secretary of the Interior's Standards for the Treatment of Historic Properties.
55	National Creek Bunkhouse Stabilization: Work to include interior reinforcement to help stabilize the structure, re-roofing to extend the life of the ruin structure. Manage as a ruin as part of the Kennecott streetscape.	This stabilization work is complete.	This action is complete and can be removed from the KOP.	NPS will continue to manage stabilization according to the Secretary of the Interior's Standards for the Treatment of Historic Properties.
56	Silk Stocking Cottages Cyclic maintenance. Remove sauna above north cottage. Currently in use as park housing.	Partially complete, ongoing. The sauna was removed in 2022.	This work is partially complete, NPS will continue working to complete the action. It can be removed from the KOP.	NPS will continue to manage stabilization according to the Secretary of the Interior's Standards for the Treatment of Historic Properties.

Number	Specific Action Item	Status	Review Conclusion	Future Actions Proposed
<b>Residential B Zone</b>				
57	Kennecott Cottage 39C, Lot 88 Stabilization: Work to include lead paint mitigation, re-establish trim and cabinetry details, repairs to interior paneling, floors and ceiling, new electrical wiring and lights, interior and exterior painting, doors and window repairs. Reconstruct outhouse and boardwalk in the back.	Partly complete, in process. The floor has been partially restored and there are plans and funding to finish. The rest of interior finishes have been renewed. There is currently no power as the building needs to be tied into the Power Plant transformer. No work has been done on the boardwalk and outhouse.	This action is partially complete, with plans to complete several portions of the action.	NPS will continue to manage stabilization according to the Secretary of the Interior's Standards for the Treatment of Historic Properties. NPS will continue to seek funding and include this project in work plans, as workforce capacity allows.
58	Kennecott Cottage 13C, Lot 80 Stabilization: None, manage as a ruin. Selective thinning that allows views of boardwalk, cottage, and railroad bed without allowing for entry to this area.	Complete. This is currently being managed as a ruin. Selective thinning of vegetation is needed.	This action is complete and can be removed from the KOP.	This property will continue to be managed as ruins and with selective vegetation thinning as needed.
59	Kennecott Cottage 39B, Lot 87 Stabilization: None, this building collapsed under the snow load in 2012. Consolidate collapsed material and manage as a ruin.	Complete. Collapsed material was consolidated and is currently being managed as a ruin.	This action is complete and can be removed from the KOP.	NPS will continue to manage stabilization according to the Secretary of the Interior's Standards for the Treatment of Historic Properties. The other materials will continue to be managed as a ruin.
<b>Other</b>				
60	Jumbo Transfer Station Stabilization: Work to include reroofing, wall and floor repairs, structural repairs.	Not complete.	This action has not been completed and NPS will continue to seek funding and include this project in work plans, as workforce capacity allows.	NPS will continue to seek funding to complete this action and include this project in work plans, as workforce capacity allows.

Number	Specific Action Item	Status	Review Conclusion	Future Actions Proposed
61	Jumbo Mine Aerial Tramway Stabilization: Stabilization of the NPS-owned lower portion of the tramway system. Stabilization to include replacement of the deteriorated structural members on the tram towers, capping of column members with metal to prevent further deterioration, and bracing and reaffixing missing connections.	Not complete.	This action has not been completed and NPS will continue to seek funding and include this project in work plans, as workforce capacity allows.	NPS will continue to seek funding to complete this action and include this project in work plans, as workforce capacity allows.
62	Mudhole Smith Cabin Stabilization: Replace sill logs, remove non-historic interior flooring, cap the chimney hole to prevent rain and snow from getting in, and maintain the roof and door window openings.	Not complete.	This action has not been completed and NPS will continue to seek funding and include this project in work plans, as workforce capacity allows.	NPS will continue to seek funding to complete this action and include this project in work plans, as workforce capacity allows.
63	Jumbo Mine/Root Glacier Outhouse <ul style="list-style-type: none"> <li>A vault toilet will be installed near the junction of the Root Glacier Trail and the Jumbo Mine Trail. The intent is to take pressure off the more remote (and unserviceable) Jumbo Creek Outhouse.</li> </ul> The existing Jumbo Creek Outhouse will be re-built and re-located. The interior of the new outhouse will be constructed of materials that are easier to clean.	Partially complete, in process.  The vault toilet at junction is installed.  The existing outhouse is planned to be rebuilt and relocated in 2022-2024. The project is currently partially funded.	This action is partially complete and NPS will continue to seek funding and include this project in work plans, as workforce capacity allows.	NPS will continue to seek funding to complete this action and include this project in work plans, as workforce capacity allows.
64	Cemetery <ul style="list-style-type: none"> <li>Develop a map of the cemetery that will be part of a self-guided tour.</li> <li>Fence maintenance/reconstruction.</li> <li>Brushing of native vegetation in order to define cemetery plots.</li> </ul> Maintenance of grave markers.	Partially complete, in process. Wayside exhibits including a map were completed and installed in 2021. Fence has not been repaired. Brushing has not occurred. Maintenance of grave markers has not been completed.	This action is partially complete, and the Kennecott Cemetery Treatment Plan will address this item and more in a comprehensive manner. This action can be removed from the KOP.	The Kennecott Cemetery Treatment Plan will outline steps needed to take to work on, maintain, and manage the site within the bounds of cultural resource management.

## Glossary

1. ACC- Architectural Control Committee-
  - a. The ACC was created in 1976, prior to NPS purchases in Kennecott, by the Great Kennecott Land Company for the purpose of enhancing and protecting the value, desirability, and attractiveness of the real property.
2. ADEC- Alaska Department of Environmental Conservation
3. ANILCA- Alaska National Interest Lands Conservation Act (1980)
4. ATV- All-Terrain Vehicle
5. CERCLA- Comprehensive Environmental Response, Compensation, and Liability Act (1980)
6. CLR- Cultural Landscape Report
7. CUA- Commercial Use Authorization
8. EA- Environmental Assessment
9. FoK- Friends of Kennicott
10. FONSI- Finding of No Significant Impact
11. Kennecott-
  - a. (With an e) pertains exclusively to features of human society including the Kennecott Copper Corporation and other features that are named after the corporation or associated copper mines including Kennecott Mines National Historic Landmark, and the Kennecott Mill Town Cultural Landscape, among others.
12. Kennicott-
  - a. (With an i) pertains mostly to natural features including the glacier, the river, and the valley, but also to some specific features of human society that are named after the Kennicott Glacier, including the Kennicott Subdivision (and therefore also the Millsite Unit of the Kennicott Subdivision) and various commercial enterprises.
13. KOP- Kennecott Operations Plan (2013)-
  - a. The KOP was completed in 2013 after a 3-year process with significant public input. The KOP describes management goals, concepts, and specific actions in the Kennecott Mines NHL with a focus on building stabilization.
14. MAC- McCarthy Area Council
15. Millsite Unit- A unit within the Kennicott Subdivision that falls within ACC jurisdiction.
16. NEPA- National Environmental Policy Act (1970)
17. NHL- National Historic Landmark
18. NPS- National Park Service
19. ORD- Off-road vehicle
20. PEPC- Planning, Environment, and Public Comment
21. Secretary of the Interior's Standards for the Treatment of Historic Properties- Linked here: [The Secretary of the Interior's Standards for the Treatment of Historic Properties \(nps.gov\)](https://www.nps.gov/subjects/nhps/)
22. TCRA- Time Critical Removal Action
23. WRST- Wrangell – St. Elias National Park and Preserve