

December 28, 2010

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

Dear Bruce and other WRST staff members:

The Frontcountry Committee of the McCarthy Area Council (MAC) was elected by the MAC members at the June 2010 MAC meeting to provide feedback from the community to Wrangell-St. Elias National Park and Preserve (WRST) regarding the development of a Frontcountry Plan. The elected members of the committee are: Kelly Bay, Wayne Marrs, Jessica Speed, Mike Loso, and Bill Morris. At the MAC meeting in September, 2010, the members of MAC voted to extend the duties of the Frontcountry Committee to also include interfacing with WRST regarding the revision of the Kennecott Interim Operations Plan (IOP). The committee is also charged with serving as a conduit for information about the Frontcountry Plan and IOP from WRST to MAC.

The MAC Frontcountry Committee has met four times (six hours total) by teleconference to discuss the draft IOP revision that was provided to us by Bruce Rogers in early November, 2010.

In this letter, we, the five members of the committee, convey to WRST our responses to the draft IOP revision. We begin with general comments, and follow with comments on specific sections of the draft revision.

### **GENERAL COMMENTS**

1) The committee feels strongly that the process of revising the IOP should not be rushed. Given that many residents aren't in McCarthy in the winter, and are less able to participate in the scoping process when they are away, the committee feels that it is critical for NPS to extend the scoping process until the summer of 2011, when face-to-face meetings between NPS and area residents can be held so that all stakeholders can provide their input before final revisions to the IOP are made. We feel it is imperative that the date for comments be extended to at least June 30th, 2011 and that local community meetings be included in this process.

2) In re-reading the 2001 IOP, members of the committee were struck by how many components of that plan were not followed in the subsequent years. Examples include the proposed footbridge and vehicle ford over National Creek, minimal clearing of vegetation, the interpretive trail to the west of the buildings, an opportunity to re-evaluate the plan after the 5 year interim period, "early and regular discussion with the community of proposed Park activities at Kennecott", "consulting with interested community members before implementing activities in administrative area, including ... evaluation of techniques that may minimize flooding along National Creek", a public-access NPS repository on site for curatorial objects, a demonstration

selective thinning project, a park-owned solid waste transfer facility, a long-term water supply for visitors, etc.

A key question this observation raises is: what will be done to ensure that in implementing the revised IOP (unlike how the original one was implemented), NPS will actually solicit community input when deviations from the stated plan are being considered?

We believe that part of the reason the original IOP was not fully implemented is the lack of institutional memory produced by frequent turnover of staff at WRST. The committee wishes to point out that several residents have been in the area since before WRST (let alone the Kennecott Mines National Historic Landmark) existed, and that the collective memory of the community could serve as a valuable resource for the Park in its ongoing operation of the Landmark. Stated another way, the community can help NPS to do its job better. We strongly urge WRST to view the community not as an adversary, but as a valuable (and valued) partner. In short, we were here before and we will be here after most current NPS staff members have moved on to other parks, and we will continue to have a vested interest in the high-quality management of Kennecott.

3) Perhaps the most glaring failure in how the 2001 IOP was implemented was in communicating NPS plans to the community and in soliciting community feedback before changes in the plan were made. Therefore, perhaps the most important component in developing the revised plan will be to come up with a clear strategy to enhance the flow of information from all levels of NPS (from the national office in Washington to AKRO to WRST headquarters in Glennallen to the district rangers in McCarthy, and finally to the residents), as well as to solicit community input before decisions to deviate from the plan are made. To be fully informed about community opinion, the Park headquarters should take full advantage of resident NPS staff in the McCarthy area, and should seek to create an open work environment so that local NPS employees feel comfortable being a bridge from the community to the WRST administration. To cultivate ongoing community good will in the future, NPS will need to stick to the revised plan as written, or involve the community in decisions to change the written plan. A good start to re-establishing communication and good will with the community would be extending the process of revising the IOP through June 2011 so as to facilitate community input.

4) An important gap we noticed in the draft revised IOP is that it does not propose to add a section to consider the role of Kennecott as a frontcountry access point. A number of issues fall under this heading:

- community impact caused by use of Kennecott easements by hikers (not just ORV users) to access the frontcountry
- liability issues for land-owners when hikers or bicyclists use the easements
- road/trail ownership, especially when informal trails cross private property
- new trails beginning in Kennecott (or not)
- informational signs for hikers (or not).

As these issues about frontcountry access are also intimately tied to the management of Kennecott, we strongly suggest you add some consideration of them in the revised IOP.

## **COMMENTS ON SPECIFIC PORTIONS OF THE DRAFT IOP REVISION**

### **Introduction:**

In addition to describing major accomplishments, this section should also include an honest assessment of failures to implement the 2001 IOP, and how such failures can be minimized or avoided in the future.

The second paragraph should say “frontcountry” instead of “backcountry”

### **Applicable Federal Laws, Regulations, and Policies**

We think this new section is valuable to include, and should be written in a way that makes these regulations clear to members of the general public. That is, it should not be written in “legalese”, although specific regulations should be cited so that interested members of the public can educate themselves about them.

### **Management Concept**

We agree that expansion of the first paragraph in this section, on management goals, would be a good idea. What are NPS goals, as distinct from the goals stated by others in documents cited in this section? Exactly which of the community values does NPS endorse?

Our committee supports the list of community values that begins on p. 4 of the draft, and it is our sense that as these were arrived at by a community process before the first IOP was written, they should still be considered as the definitive community view of how Kennecott should be managed. We think it would be best for NPS to adhere to them until such time as they are modified by a new community process. That being said, we recognize that these principles were decided 10 years ago, and it is probably time for the community to revisit them to see if they are still valid (and if there are any new principles that should be added to the list). As a committee, we encourage Mark Vail as MAC president to undertake such a re-evaluation of the guiding document in community meetings next summer. Regarding the text “...a way to evaluate NPS plans and actions” that precedes the list of community values, we reiterate both the need for this and MAC’s willingness to work to achieve it.

We also appreciate the sentiment in the comment after the following paragraph, noting that the phrase “NPS mandates would have to take precedence” from the first IOP is vague and has led to some NPS/community misunderstanding. We believe that MAC stands ready to work with WRST to develop a more transparent, less confrontational procedure to resolve NPS/community conflicts.

### **Partnerships**

As we stated in our general comments above, we agree it is vital to strengthen the partnership between NPS and the community in the operation of Kennecott. Some questions we think should be considered in the revised plan are:

1) Should there be a standing MAC committee to interface with WRST or AKRO, even in the “off season” when “absentee stakeholders” are elsewhere?

2) Can technology make better WRST/MAC communication possible year round?

For example, as to the bullet point

- A newsletter describing anticipated WRST activities for the area

we ask: can these updates be made frequently (for example monthly), and can NPS propose mechanisms (for example, an open-access Google Group? a blog?) for TWO-WAY communication, so that the Park informs the community of its plans and the community can give rapid feedback to the Park?

3) Will the communication strategy address mechanisms to improve the flow of information all along the chain from the very top (NPS Headquarters in DC and AKRO) to WRST and all the way down to NPS staff in Kennecott/McCarthy? We believe it should.

4) Will tours of the buildings remain a partnership? Private enterprise has been doing tours since before Kennecott was NPS property. Some residents have serious concerns about the possibility that NPS would take over all tours and exclude local enterprise, and that construction would close key buildings for long periods, impacting both tourists and local businesses. Can some of these concerns be allayed in this section?

### **Architectural Control Committee and Mill Site Subdivision Covenants**

This committee feels that MAC can aid in the process of revising the covenants by giving feedback to the ACC and landowners (including NPS) about how their decisions might have broader effects on the community. Decisions of the ACC do affect members of the broader MAC community (both residents and businesses) outside of the Mill Site landowners.

### **Cultural Resources**

#### **Cultural Landscape**

Overall, the committee is concerned that NPS is not maintaining the “abandoned mining town feel” as agreed upon in the original IOP. We think the majority of the community still favors a “light touch” management approach.

#### Table 1 – Zone 6

The committee supports the idea that concessions – private local business – will have a presence in Kennecott buildings in Zone 6, and that the Wrangell Mountain Center will have a presence in the West Bunkhouse.

“An interpretive trail would..”

This paragraph raises a number of issues that will be of concern for community members, so we agree that current plans here should be specified in detail and given ample time for community input (both written and verbal).

Pg 9. "Circulation and Access", 1st paragraph: "Primary and secondary pedestrian paths would be identified and reestablished within the NHL, particularly in the mill town subdivision."

We think this statement needs as much clarification as does the preceding statement about vehicular access.

Pg 9. Proposed new section on ORVs:

The use by visitors of ORVs on the Kennecott easements is a key issue for many residents, both of Kennecott and of the wider McCarthy area. We welcome comprehensive consideration of this issue in the revised IOP. This issue in particular will require community input in face-to-face meetings next summer.

The committee was uncertain about whether the phrase "a discussion/determination of whether recreational ORV use is compatible with the purposes and values of the NHL" refers to a final determination on this issue. If so, full stakeholder input needs to be sought first.

Administrative ORV use by NPS staff is definitely an issue. Such use has increased, without any apparent consideration of impact on residents and visitors. We welcome this consideration in the revised IOP.

Pg 10. Proposed new section on parking:

Explicit plans need to be included about how and where residents without direct road access to their properties will be able to park their private vehicles.

Pg. 10 "Views and Vistas", whole 1st paragraph – The NPS is discussing clearing/thinning of vegetation to "enhance historic viewsheds".

We agree that specific details are needed in this section, in particular about how thinning would adhere to the "light touch" approach.

## **Archeological Resources**

### **Museum Collections and Archives**

'Artifacts' following the closure of the mine demonstrate the continuum of life in Kennecott since the mines closed in 1938. At times, the park seems to view anything related to the Kennecott Corporation during the mine's operational years as treasure, but anything following as trash. It's important to preserve the full history of Kennecott. For example, we would like to see the Consolidated Wrangell Mining equipment returned to its original location. We don't want to see Kennecott acquire a "frozen in time" feel, like a Colonial Williamsburg of the North. We agree that plans to combat the "sanitized" look that areas tend to take on after stabilizing/rehabilitation need to be made explicit in the revision.

The committee is concerned about the possibility that cultural artifacts (e.g., the Kennecott Post Office sign) will be permanently transferred to NPS archives off-site where no one will ever see them. Thus specifying plans to keep artifacts on site and make them accessible is key.

For historical documents that cannot be well preserved on-site, please consider plans to make copies available to the community (e.g., in the Museum or the Zak house).

## **Structures**

The pace of development should be sensitive to the amount of time required for adequate community input, and not governed purely by short-term funding opportunities. For example, the National Creek Trestle project was suddenly funded following a flood. With minimal community input, the trestle was then rebuilt in a style that is incongruent with the existing IOP, and was subsequently used to justify additional deviations from that plan (such as complete removal of the historic assay office to protect the trestle and heavy-handed – not “light touch” – modifications to protect the trestle from future National Creek flooding). From community meetings in the summer of 2010, we know that NPS staff agrees that such communication failures regarding planned modifications of Kennecott structures need to be avoided in the future. So once again, the communication strategy specified in this revision will be key.

Pg. 12 “Buildings”, 2<sup>nd</sup> paragraph – “The park would work with local interests to rehabilitate the historic community building for community activities and NPS programs.” -

We think it’s fine that the Rec Hall is rented out for big events (e.g., weddings, music performances, etc.), but we would also like to see it be more open and available to the community, including but not limited to using it for one of its original functions: basketball games.

Pg. 12 – “PRESERVATION GOAL”, 1<sup>st</sup> paragraph states that the NPS preservation goals will be met by “repairing and replacing deteriorated roofs, walls and foundations while preserving the present abandoned character of the site.”

We question whether all of the work done since 2001 has been in keeping with the goal of “preserving the present abandoned character of the site”. We think in many cases it has not. How will future work hew more closely to this goal? We think it is essential that the restored buildings continue to look old. This is a key part of maintaining a ghost town feel, not the toy-town look that we feel Kennecott is beginning to acquire.

“...retain the industrial artifacts in place as part of the landscape character”

As we noted above, we think this should include the Consolidated Wrangell Mining equipment and other items left behind over the years.

Pg. 13 “Bridges”

What happened to the plan for a low-water crossing at National Creek for vehicular traffic?

Pg. 13 “Historic Boardwalks”

A somewhat related issue here:

In the original IOP, NPS labeled the concentration mill ore chute as a “character-defining architectural feature”, so we would like to encourage the NPS to put it back.

## **Natural Resources**

Pg. 13, inserted text just under title “Natural Resources”

If it is to be a guiding document, we would like to see the Draft Kennecott Historic Landscape Plan mentioned here included as an appendix to the revised IOP. Many residents have never seen this plan, and we question how much opportunity was given for community input into it.

Pg.14 “Natural Resources”, 2<sup>nd</sup> paragraph states “The NPS will undertake a demonstration project in a small section of the administrative area to illustrate what is meant by selective thinning to help community members understand what a finished project in the area might look like“

We think this is a good idea and we encourage NPS to give the community more such demonstrations, followed by ample time for commentary, before planning decisions are made.

Pg.14 “community garden”

We agree that NPS supporting a community garden would be a visible symbol of partnership, but we are not clear about where this would be located in relation to private land. Providing space in Kennecott for the Wrangell Mountains Center to maintain a community garden (similar to the garden it currently maintains in McCarthy) would supplement its future management of the West Bunkhouse, should that occur.

Please include in the section on Natural Resources a detailed plan for protecting the long-term drinking water supply, both winter and summer.

## **Interpretation**

We would like to see NPS avoid interpreting Kennecott to death, with excessive signage. This would not be in keeping with the ghost town feel and the desire to foster “contemplation and individual reflection”.

Pg. 15 “Interpretation”, paragraph 1, “The NPS would enter agreements with qualified local providers to conduct guided tours”

As we stated in our general comments above, we strongly endorse continued partnerships with local businesses to conduct guided tours of Kennecott. Partnerships were part of the basis for acquisition, and they need to be protected, not choked by red tape.

Pg. 15 “Interpretation”, paragraph 2, talks about interpretive plaques and states “In all cases, the park would work with commercial and nonprofit organizations, primarily local based, using universal design principles to establish accurate and consistent interpretive information and program content”

We endorse this idea, and we think it can also be extended to the use of community expertise in designing interpretive signs about the NATURAL history of the area.

Pg. 15 “Interpretation”, paragraph 3 “The safety of potential tours to the mine sites and through the underground tunnels would be assessed, and the NPS would evaluate the possibility of offering one or more such tours in the future”

We like the idea of tours in the mines – they could be fun!

Pg. 15: a bookstore in the historic company store

We think NPS needs to recognize that this bookstore, which now exists, is an example of a tendency for the Park to compete with local businesses (in this case, Fireweed Mountain Depot, just down the street). Will the revised plan address ways to minimize such competition?

### **Accessibility**

While we understand the spirit of the ADA, and support access for all to some of the buildings, we do not feel that it is possible to make every structure accessible (e.g., through a ramp such as the one constructed to access the General Manager's Office, which has a larger footprint than the Office itself) and still keep with the "light-touch" management approach. Where will the limits be drawn? As a guiding principle, we feel that that access should not be at the cost of the character of the site.

### **Administration and Operations**

#### **Park Management**

We feel it is important for NPS to recognize that decisions it makes about the number of staff based in Kennecott, whether they are local residents or are hired nationally and need to be provided with living quarters, and whether they are paid or are volunteers all have impacts on the local economy and on the feel of the town. We would like to see NPS have more self-awareness as an agency that it is the "900 pound gorilla", and that it needs to be careful not to crush its neighbors.

Pg. 16 "Park Management", paragraph 1 "The NPS would enter if at all possible into multi-year agreements for others to conduct building tours, and to adaptively reuse some structures." Once again, we strongly endorse this statement.

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

As far as we know, none of the planned projects mentioned in the inserted text (potable water utility system, a large water storage tank, water treatment structure, surface water lines, and fire suppression systems) have been previously discussed with the community. Is community input on these projects (unlike the new National Creek Trestle) to be sought before the decision to initiate them is made, or are they to be presented in the revised IOP as a "done deal?". If community input is to be sought, will sufficient time be allowed to have meetings next summer, or will the scoping process be rushed?

All of these plans raise serious issues about ongoing construction noise and traffic congestion into the foreseeable future, greatly affecting the quality of life for residents who now find themselves living not in the peaceful wilderness setting for which they came to the area, but instead in a perpetual construction zone. What will be done to mitigate these quality-of-life impacts for both residents and visitors?

Pg. 16 “NPS Utilities and Infrastructure”, paragraph 3 – “Bearproof trash containers would be placed at strategic locations along the main road”

One by the toilet does not seem sufficient, but we also don’t want trash cans all over the place. Also, this paragraph mentions “a park-owned solid waste transfer facility at the end of the McCarthy Road”. We are not aware that such a facility was ever implemented. If it is still planned, will it be open to the community?

Pg. 17 “NPS Utilities and Infrastructure”, paragraph 4 – “Photovoltaic power, hydroelectric generation from National Creek, or a centralized community generator would be considered among other possibilities.

The new generator by the old Dairy Barn is another example of a project undertaken with minimal community input, despite the noise impact it has on local residents. Can this noise be reduced in the future? We encourage greener (and quieter) alternative energy solutions in the future, but note that these also should be fully vetted with the community before a decision to proceed is reached (for example, would hydroelectric power systems interfere with residents’ water supply?).

## **Safety and Security**

A growing safety concern of the community is the number of NPS construction (and other) vehicles using the roads, and the increasing speeds at which some of them are traveling.

Pg. 16 “Safety and Security”, paragraph 2, “Broken doors and locks would be repaired and replaced as appropriate. Windows would be replaced, and mechanisms to prevent unauthorized and unsafe access would be used such as shutters, wire mesh, or other appropriate devices.”

It is important that NPS not destroy the character of Kennecott while doing this.

## **Hazards**

Please consider including in the revised IOP a section on how ongoing stabilization/restoration activities will be conducted in such a way as to safeguard local sources of drinking water.

## ***Closing comments:***

Thank you for considering our comments, and we and the rest of the McCarthy community look forward to partnering with WRST staff to develop an improved Operations Plan for the Kennecott Mines National Historic Landmark.

Sincerely,

Kelly Bay, Mike Loso, Wayne Marrs, Bill Morris, and Jessica Speed