

*National Park Service*  
**U.S. Department of the Interior**

**Wrangell-St. Elias**  
**National Park and Preserve**  
**Alaska**



**Finding of No Significant Impact**

**Kennecott Support Facilities Plan**

**July 2007**

Recommended:

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\_\_\_\_\_  
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*8/01/2007*  
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Date

Approved:

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\_\_\_\_\_  
Regional Director, Alaska

*8/2/2007*  
\_\_\_\_\_  
Date

## **FINDING OF NO SIGNIFICANT IMPACT**

### **Kennecott Support Facilities Plan**

#### **Wrangell-St. Elias National Park and Preserve, Alaska**

**July 2007**

In 2006, the National Park Service (NPS) completed an environmental assessment (EA) for the Kennecott Support Facilities (KSFP) Plan for the Kennecott Mines National Historic Landmark (NHL) of Wrangell-St. Elias National Preserve. The NHL preserves a diverse array of historic mining-era buildings and artifacts as well as the ongoing aspects of life in an Alaskan bush community. The purpose of the KSFP is 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 McCarthy Road corridor. This would include 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. Some of these projects, such as water and power system implementation will still need additional site specific compliance and planning work, which would include public involvement prior to making final decisions.

This plan amends the 1986 WRST General Management Plan (GMP) and complements the 2000 Kennecott NHL Interim Operations Plan (IOP) and the 2001 Cultural Landscape Report (CLR) for Kennecott Mill Town and carries forward the management strategy proposed in these previous planning efforts.

The NPS has selected a slightly modified version of the Proposed Action Alternative: Implement Kennecott Support Facilities Plan (NPS Preferred Alternative) along with the mitigating measures.

Fifty parties provided comments during the EA public review period. Some commented through the public meeting and some through correspondence. More than half of the participants provided comments through both forums. A number of substantive comments were received, and the NPS response to these comments is provided in the attachment to this Finding of No Significant Impact. No changes were made to the EA, though sections of the plan were revised to provide clarification and better information on implementation times.

### **ALTERNATIVES**

Two alternatives were evaluated in this EA:

#### **No Action Alternative:**

The No Action Alternative represents the ongoing situation and assumes that the existing conditions would continue indefinitely. No new buildings, structures, services, or programs would be implemented unless already approved through separate planning processes.

## **Proposed Action Alternative: Implement Kennecott Support Facilities Plan (NPS Preferred Alternative and Environmentally Preferred Alternative)**

The NPS Proposed Action Alternative contains the following elements:

### **General**

- Housing for NPS employees
  - NPS Housing assessment identifies the future need for up to 32 employees. Employees include those duty-stationed at the NHL, as well as transient and contract employees. The NPS will incrementally provide housing as positions and funding become available in the future.
  - Maintain all existing, under-construction, and planned housing in the NHL, McCarthy, and the Operations Support Complex.
  - Encourage employee rentals of local privately-owned housing
- Power Generation and Distribution
  - A combination of hydroelectric power generation and propane power generation would accommodate power needs in West McCarthy and Kennecott. These systems would need further compliance and evaluation, which would include public participation before final decisions are made.
  - *NPS would consider emerging technologies such as hydrogen fuel cells as they become available.*
- Sanitary Sewer System: Collection, treatment and disposal of sewage (wastewater) in both NHL and the west side Operations Support Complex would be achieved primarily by septic systems (septic tanks and leach fields).
- Water Gathering and Storage: Installation of water lines will entail further evaluation and compliance before implementation, public involvement would be a part of that process.
- *Transportation: This plan was written to reflect the standards outline in the McCarthy Road scenic corridor plan.<sup>1</sup>*

### **Kennecott NHL**

- Housing for NPS employees
  - Consider buying and rehabilitating any privately-owned historic houses in the NHL if they become available for purchase.
- Construction Materials Storage
  - Limited project materials storage (in addition to equipment storage/parking & employee parking) would occur at Dairy Barn if it can be accomplished by a visually unobtrusive method such as fencing or vegetation screening.
  - No bulk fuel would be stored at NHL. Small quantities of vehicle fuel would be maintained at the Dairy Barn.
  - Assuming continued access via the freight bridge, the NPS would bury the propane tanks that service the NPS buildings in the NHL.
- Power Generation and Distribution- this endeavor will receive further study, planning, design, and compliance, including public involvement before implementation occurs.

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<sup>1</sup> *Italicized items denote general activities that are not associated with a designated location.*

- If a hydroelectric system moves forward it will require the construction of approximately 800-2,000 linear feet of water line between the water storage tank and the Pelton wheel situated at the historic Power Plant building. Since a water line was in existence during the mining era, it may be possible to use the same location for this effort. In addition, adapt interior of the Power Plant building to accommodate use of the Pelton wheel while keeping historic building elements intact.
- If a hydroelectric system moves forward, during stream low-flow periods (in the off season), propane would fuel a generator that would serve as a supplemental power source at the Kennecott NHL.
- Retain and reuse existing satellite generator building west of the Company Store.
- Construct combination of buried and overhead electrical power distribution lines to replicate the historic power distribution system.
- Sanitary Sewer System
  - Buildings that would be equipped with sewer service are the Dairy Barn, Old School, Recreation Hall, New School, West Bunkhouse, Store, Machine Shop, Power Plant and Silk Stocking cottages.
  - Excavate along the west side of the site behind Store and under the historic wagon road. Provide about 1050 linear feet of buried sewer line from the Store to the Dairy Barn.
  - Sewage lift station may be required; it would be installed in a buried manhole in the line between the Store and Dairy Barn.
  - Expansion of leach fields would require additional excavation. A conventional septic and leach field would be developed adjacent to the Silk Stocking cottages.
- Fire Suppression
  - Within core of NHL, proposed fire suppression system would consist of a combination of underground and above ground piping in reconstructed wooden utilidors with installed hydrants, water suppression/sprinkler system at each building, and mini-pumper emergency response vehicle.
  - Install wet/dry conventional sprinkler system in buildings with exception of the Mill and Power Plant.
  - Use foam deluge system at the Mill because of its unique construction and sheer size.
  - At Power Plant, use computer modeling to determine need for installation of sprinklers.
  - Proposed fire suppression includes year-round fire detection and security monitoring using combined systems.
- Water Gathering and Storage- this endeavor will receive further study, planning, design, and compliance, including public involvement before implementation occurs.
  - Alternatives for a water intake structure include Bonanza Creek and possibly National Creek. If Bonanza Creek is selected, it would be constructed at or below the historic intake on Bonanza Creek at an elevation of about 2350 feet. Another water intake structure may be constructed at an elevation of about 2350 feet on National Creek.
  - A water storage tank with a capacity of 150,000 gallons would be constructed at an elevation of about 2,270 feet.

- About 2200-2600 linear feet of 10-inch diameter hydroelectric waterline between the Bonanza Creek intake and the storage tank would be constructed, either on grade or buried 4-6 feet. A pathway 6-9 feet wide for construction equipment and line maintenance would be constructed parallel to the pipeline.
- Another water supply pipeline extending 1,400-2,100 linear feet from the National Creek intake to the storage tank would also be constructed on grade or buried 4-6 feet. A route would be cleared and graded to a width of 12-16 feet. A pathway for construction equipment and line maintenance would be constructed parallel to the pipeline from National Creek. Recurring maintenance would use all-terrain vehicles and the final path width would be 6-9 feet.
- Potable Water Treatment and Distribution
  - In the long term, two potable water sources would be investigated for Kennecott: conventional wells and surface water drawn from the aforementioned water gathering and storage infrastructure.
  - Wells would be located at least 200 feet from private property to avoid restricting the use and development of private property.
  - A potable water treatment facility would be constructed at either the historic Refrigeration Building, or above the Mill near the proposed water storage tank. Facility design would assure compatibility with the historic fabric. Construction would require clearing and grading for a building 250-500 square feet in size.
  - A treated potable water line 2,800-3,600 feet long would be constructed parallel with a fire flow distribution line in the historic railroad alleyway of the Mill Town. The piping would run together in buried or reconstructed above-ground wood utilidors.
  - The Dairy Barn, Old School, Recreation Hall, New School, West Bunkhouse, Store, Machine Shop, and Power Plant would be connected to the potable water distribution lines with buried connections and fittings. A pump station and potable water line would service 2-4 cottages.
  - *In the short-term, until the water system is expanded, bottled water would be available for purchase at the Depot.*
- National Creek
  - Reconstruct the historic National Creek trestle. Clear debris out of adjacent stream and harden abutments to help channelize creek and prevent bank erosion.
  - Depending on the results and recommendations of an ongoing geomorphological study, NPS may evaluate alternative methods to implement in National Creek to reduce erosion, flooding, and associated damage.
- Utilidors
  - Wooden utilidors would be reconstructed and incorporated in the installation of the new utility systems (water and electric) while preserving historic features.
  - About 300-700 linear feet of new utilidors would be constructed to match the historic utilidors.
  - Within the railroad corridor of the Mill Town, 500-2,500 linear feet of new buried utilidors would be constructed.
- Transportation
  - In the NHL, develop MOU with landowners to manage vehicle access and parking; allow for vehicle parking in NHL by landowners, their guests, local

McCarthy residents, NPS staff and contractors in designated, limited areas with a daily time limit.

- Permit NPS and contractor parking only at Dairy Barn, and allow limited parking by event organizers at Recreation Hall when they are using the facility for a private function.
- NPS would pursue a policy with other NHL landowners limiting parking to 2-4 hours within ROW in support of transfer of goods and people.
- Develop a vehicle turnaround in the NHL at the upper terrace of the recently-purchased Dairy Barn property near the southernmost boundary of the Mill Town.
- Seek cooperative agreement with NHL landowners and businesses to address NHL road maintenance.
- *NPS will discourage use of common easements in the NHL for vehicle parking, and will work with landowners to accommodate limited parking at a mutually agreeable location.*
- *NPS will encourage and support bicycle rentals.*
- Visitor Amenities: Establish partnerships to maintain existing trails such as Jumbo, Bonanza, Root Glacier, etc.

#### **West of the Kennicott River**

- Construct more permanent housing units – including single family housing and dormitory style west of Kennicott River on federal lands south of the Park Operations Support Complex.
- Operations Support Complex:
  - Construction Materials Storage
    - Bulk storage would occur at Operations Support Complex, as well as contractor storage camp and mobilization, and NPS equipment storage.
    - Bulk fuel storage.
  - Power Generation and Distribution: Preferred power source is propane for a generator with integrated photovoltaic electrical generation.
  - Fire Suppression: Develop building sprinkler system with water pumped from well, and provide plastic water holding tank external to well house with up to 10,000 gallon tank capacity.
  - Potable Water Treatment and Distribution: Support Complex supplied by well.
- McCarthy Visitor Information Station
  - Maintain a potable water storage tank at the McCarthy Road Information Station with tank refills.
  - As funding allows, staff McCarthy Road Information Station with NPS personnel and trained community volunteers; staff it from Memorial Day to Labor Day, seven days a week, eight hours per day; explore partnerships for staffing. Volunteers have been used and are being used to supplement paid employees to staff this facility.
  - Adjacent to the parking area- the NPS will improve, with some re-routing, the social trail that has been created by park visitors to by-pass private property in order to access the west side of the glacier.

- Parking:
  - West of Kennicott River: establish gateway to McCarthy/Kennecott and expand NPS public parking (up to 20 spaces) in vicinity of McCarthy Road Information Station with NPS welcome sign.
  - Access from West Side Parking Areas to Footbridge: Visitors can walk to footbridge or they can utilize the private shuttle than operates in this area.
- Place a Welcome sign before the bend in the road on the west side of the Kennicott River (between MP58 and MP59). The sign text would identify the park unit, the NHL, and the community.
- *Locally derived household waste would be consolidated at the Alaska DNR Firewise Pavilion site. Contracting for transport and disposal outside the park at an approved solid waste facility would be implemented. This element requires revision of NPS solid waste regulations, a process that began with the Federal Register publication of a proposed special park regulation on December 27, 2006 (see 71 FR 77666). A final approved regulation (currently proposed as 36 CFR 13.1912) is expected by late 2007.*

#### Activities at Other Locations

- McCarthy: Sanitary Sewer System: Develop well or septic system for McCarthy Cabin.
- Visitor Amenities
  - Partner with the State of Alaska and put panel information at State fire-wise pavilion west of the bend in road.
  - With signage and visitor contact, introduce visitors to the complexity of area land ownership.
  - Develop comprehensive signage and wayfinding system.
  - Potentially develop traveler information system at Long Lake for local AM-FM broadcasting.
  - *At this juncture, NPS will communicate with State of Alaska Department of Transportation & Public Facilities (DOT&PF) that it is not necessary to develop a wayside at the slide area between McCarthy and Kennecott.*
  - *NPS will continue to develop transportation-related interpretive exhibits.*
  - *In the popular camping and hiking area within and adjacent to the NHL, visitors would rely on established backcountry sanitation techniques. Primitive restroom facilities, such as outhouses, may be considered by NPS at a later date in locations to be determined.*
  - *If the NPS receives funding to construct the walk-in campground, the NPS will patrol the campground regularly to ensure that campers follow standard bear safety rules, such as the consistent securing of bear attractants, which would lower the potential for human-bear conflicts.*
- Transportation
  - Mark Wagon Road for visitor/local use, and retain its historic character as a wagon road.
  - Design rail corridor road as one lane gravel road that maintains historic character with 25 MPH speed limit designed to accommodate safe vehicle passing.
  - Seek cooperative agreement with State and local landowners to address road maintenance outside of NHL.

- Parking: East of Kennicott River: encourage development of new private parking and develop parking for 20 cars at boneyard concealed behind railroad berm following clearing of abandoned vehicles.
- Shuttle System:
  - Organize effective NPS crew shuttle system to service employees from west side Kennicott River to Kennecott NHL.
  - Work with local community to develop efficient shuttle system and adequate hours of operation.
  - Establish designated van shuttle stops at the following locations: west-side development, McCarthy Road Information Station, west and east sides of the Kennicott River foot-bridge, the boneyard, in McCarthy itself, at the 'Y' near the museum, at the airport, at the campground, and at the NHL.
  - The NPS would encourage commercial operators to provide shuttle service from McCarthy to Kennecott.
- Work with ADOT&PF to develop intervisible pullouts and other road design features to improve traffic flow and safety.

All of the above components of the proposed alternative are reflected in the attached site plans. Implementation of these myriad of projects will be contingent upon receipt of funding for these specific efforts.

## **PUBLIC INVOLVEMENT**

The EA was released for public review and comment from August 10<sup>th</sup>, 2006 through September 10<sup>th</sup>, 2006. It was placed on the PEPC website on August 10<sup>th</sup>, 2006. A press release announcing the availability of the EA and the public comment period was issued on August 8<sup>th</sup>, 2006. The news release was aired by radio stations in Valdez and Glennallen, Alaska, during the public comment period. A public meeting was held at the Kennecott Recreation Hall on August 31<sup>st</sup> (evening, 23 people in attendance). A facilitator collected comments at this meeting. At this meeting, the comment period was extended to September 30<sup>th</sup> of 2006.

Written comments were received from the State of Alaska, ANILCA Implementation Program; National Parks Conservation Association (NPCA); Alaska Travel Industry Association, and 21 local residents. Comments received were of a clarifying nature, supported the proposed action as described, or expressed no objections to the proposed action. The public comments did not change the conclusions in the EA concerning the environmental effects of the proposed action, though sections of the plan were revised to provide clarification and better information on implementation times. NPS responses to the substantive comments are provided in Attachment A.

## **DECISION**

The NPS decision is to select the Proposed Action Alternative: Implement Kennecott Support Facilities Plan (NPS Preferred Alternative and Environmentally Preferred Alternative) along with the mitigating measures. Plan was modified based on public comments to clarify which elements would be implemented in the near term and which would be implemented later on after



additional planning, public involvement, and when funding was available. (For example, most of the utilities proposed, with the exception of the fire suppression system, are not currently in a NPS funding request. Additionally, some utility components, such as the hydroelectric system need detailed feasibility and design before any decision to implement such a system could be made. Other elements such as a variety of items under the transportation category do not have viable funding sources within the NPS budget process and funding will need to come from partner or grant sources. The trail proposed along the glacier edge to Kennecott has been postponed until funding for the campground can be obtained and additional public comment can be conducted.)

### Mitigating Measures

Resource Area	Mitigating Measures
Soil & Water Resources	<ul style="list-style-type: none"> <li>• The NPS would develop a Storm Water Pollution Prevention Plan (SWPPP) to control overland flow and reduce the potential for sedimentation from any construction site as required by the Alaska DEC NPDES Storm Water General Permit for Large and Small Construction Activities.</li> <li>• Pursuant to Section 401 of the CWA, the NPS would obtain State water quality certification from Alaska DEC, when construction would occur in or near “Waters of the United States”.</li> <li>• Measures would be taken to prevent or control accidental spills of fuels, lubricants, and chemicals from entering waterways and wetlands. Specifically, no fuels would be stored at construction sites, refueling would occur away from waterways and wetlands, and an emergency spill kit, containing absorption pads, absorbent material, a shovel or rake, and other cleanup items, would be readily available on-site in the event of an accidental spill.</li> <li>• Construction would not be conducted when soils are saturated, such as during or immediately following rain events.</li> <li>• When a trail is constructed or maintained, ensure proper installation of drainage controls along the trail to control increased surface water runoff from the trail and to reduce subsequent erosion and sedimentation.</li> <li>• All disturbed areas will be revegetated after construction to stabilize soils over the long-term.</li> </ul>
Vegetation	<ul style="list-style-type: none"> <li>• Project sites would be surveyed by a park botanist prior to ground disturbance – preferably during the design stage, when alternative locations may still be feasible – for the presence of rare plant species as designated by the Alaska Natural Heritage Program. Where practicable, all efforts will be taken to mitigate effects on rare plants by impact avoidance.</li> <li>• Any disturbed areas would be revegetated using native materials removed from the project site for construction, or secondarily, with seed from local sources. Any storage of the vegetation mat would be limited to the minimum amount of time necessary to prevent loss of seed and root viability, loss of organic matter, and degradation of soil microbial activity. Topsoil will be replaced where possible to facilitate passive revegetation by native, local plants.</li> </ul>

Wildlife & Visitor Safety	<ul style="list-style-type: none"> <li>• NPS educational and outreach efforts to visitors and residents will consistently address the need to reduce conflicts with bears and means of doing so.</li> <li>• Bear safety instructions would be posted at the campground kiosk.</li> <li>• Use signage and/or brochures to remind visitors that as part of the national park system, wildlife is not to be disturbed.</li> </ul>
Cultural Resources	<ul style="list-style-type: none"> <li>• If previously unidentified archaeological features are encountered during construction inside or outside the NHL, work would cease immediately and the park superintendent would be notified to ensure protection of cultural resources.</li> </ul>

## Rationale for the Decision

Implementing the Kennecott Support Facilities Plan with mitigating measures will satisfy the purpose and need of the project better than the No Action Alternative because it enables the NPS to manage this area of the park so that operations at Kennecott NHL proceed in the best manner possible. Plan implementation will assure protection of park resources in accordance with ANILCA, the Organic Act and the National Historic Preservation Act.

The No Action alternative does not provide sufficient facilities to serve visitors, the local communities, or the NPS in order to both continue to stabilize historic features, protect the cultural landscape and adequately accommodate existing and increasing visitation.

## Significance Criteria

The preferred alternative will not have a significant effect on the human environment. This conclusion is based on the following examination of the significance criteria defined in 40 CFR Section 1508.27. Therefore, the preferred alternative will not have a significant effect on the human environment.

*(1) Impacts that may be both beneficial and adverse. A significant effect may exist even if the Federal agency believes that on balance the effect will be beneficial.* The EA evaluated the effects of the preferred alternative (plan implementation) on vegetation, water quality, cultural resources, and safety hazards. There will be negligible effects on vegetation, minor adverse effects on water quality and fish, negligible effects on cultural resources, and minor-moderate increased safety risks.

*(2) The degree to which the proposed action affects public health or safety.* The proposed action will have minor to moderate safety risks

*(3) Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.* The plan's purpose is to design park operations in such a manner that the Kennecott Mines National Historical Landmark (NHL), is protected and managed effectively. The Proposed Action Alternative would have negligible impacts on the long-term condition of archeological resources inside the NHL and no impacts on those outside the NHL. Overall, the Proposed Action Alternative would produce moderately beneficial, long-term, localized impacts on historic structures and buildings within the NHL, as well as on cultural objects, museum collections and archives. For example, historic structures and buildings within the NHL would

continue to undergo stabilization and rehabilitation, and the NPS would continue to maintain current preservation practices and procedures with regard to artifacts and cultural objects. Improved initial attack capabilities and a new fire suppression system would greatly increase the probability of saving these cultural resources from fire damage.

*(4) The degree to which effects on the quality of the human environment are likely to be highly controversial.* The plan received a high level of interest from the public as evidenced by the attendance at meetings and the comments received. However, there was little to no controversy regarding the effects of the proposed action on the human environment provided certain actions, such as the implementation of the hydroelectric system received additional public comment and environmental analysis. As stated above, such additional planning and analysis would occur.

*(5) The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.* The degree or possibility that the effects on the human environment will be highly uncertain or will involve unique or unknown risks is low.

*(6) The degree to which the action may establish a precedent of future actions with significant effects or represents a decision in principle about a future consideration.* The degree or possibility that the action may establish a precedent of future actions with significant effects or represents a decision in principle about future considerations is remote.

*(7) Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts.* The action would provide more efficient operations in the Kennecott District for operations and services to visitors and continuing stabilization of the Cultural Landscape. It tiers to the existing Cultural Landscape Plan and operations plan and expands section of it. The action is not related to other actions of individual insignificance that will amount to cumulatively significant impacts on the environment.

*(8) Degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.* Implementation of the plan will have beneficial effects to the National Historic Landmark, since it will improve efficiency of NPS operations that undertake the ongoing stabilization and preservation of the site.

*(9) The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973.* There are no threatened or endangered species or critical habitat in the project area.

*(10) Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment.* The action will not cause a violation of any Federal, State, or local law or requirements for environmental protection.

## **FINDINGS**

The levels of adverse impacts to park resources anticipated from the selected alternative will not result in an impairment of park resources that fulfill specific purposes identified in the establishing legislation or that are key to the natural or cultural integrity of the park.

The selected alternative complies with the Endangered Species Act, the National Historic Preservation Act, and Executive Orders 11988 and 11990 for floodplains and wetlands. There will be no restriction of subsistence activities as documented by the Alaska National Interest Lands Conservation Act, Title VIII, Section 810(a) Summary Evaluation and Findings.

The NPS has determined that the selected alternative does not constitute a major federal action significantly affecting the quality of the human environment. Therefore, in accordance with the National Environmental Policy Act of 1969 and regulations of the Council on Environmental Quality (40 CFR 1508.9), an environmental impact statement is not needed and will not be prepared for this project.

## ATTACHMENT A

### NPS Responses to Public Comments for the Kennecott Support Facilities Plan Environmental Assessment

This attachment amends the subject environmental assessment (EA) and provides NPS responses to public comments.

#### NPS RESPONSE TO PUBLIC COMMENTS

The EA was released for public review and comment from August 10<sup>th</sup>, 2006 through September 10<sup>th</sup>, 2006. It was placed on the PEPC website on August 10<sup>th</sup>, 2006. A press release announcing the availability of the EA and the public comment period was issued on August 8<sup>th</sup>, 2006. The news release was aired by radio stations in Valdez and Glennallen, Alaska, during the public comment period. A public meeting was held in Kennecott August 31<sup>st</sup> in the evening at the Kennecott Recreation Hall. Twenty three people were in attendance. A facilitator collected comments at this meeting. At this meeting, the comment period was extended to September 30<sup>th</sup> of 2006.

Comments were received from the State of Alaska, ANILCA Implementation Program (State); National Parks Conservation Association (NPCA); Alaska Travel Industry Association (ATIA) and twenty two local residents. Comments received were of a clarifying nature, supported the proposed action as described (ATIA, State of AK), asked that some activities be removed from the plan, or asked that some activities be evaluated more fully as more information became available (community members). The public comments did not change the conclusions in the EA concerning the environmental effects of the proposed action.

The paraphrased comments and the NPS responses follow.

Substantive comments are those that modify the existing alternatives, propose new alternatives not previously considered, supplement, improve, or modify the impact analysis, or make factual corrections. These comments did not change the EA conclusions about the effects of the proposed action or other alternatives.

**Comment No. 1:** A number of community members commented that the scale of the plan appeared to be of a larger scope than was articulated in the Interim Operations Plan/Cultural Landscape Report/ GMP Amendment. Commenters requested that these concepts in this first document be re-ratified. (PM, CL)

**Response:** *The NPS referenced this beginning plan in the KSFP. Language will be added to the KSFP that re-iterates that this plan tiers to the first plan and that the management concepts from this first plan have not changed.*

**Comment No. 2:** A number of community members commented that the discussion of a future hydroelectric power system was too general and did not fully discuss potential environmental impacts. (PM,CL, #1)

**Response:** *The EA proposed and analyzed only the concept of a hydroelectric power system. The NPS agrees that further information is needed (e.g., stream flow data), before a decision on the feasibility of such a system is made. Specifically, in Section 4.4.10 of the EA, the NPS noted that there would be more detailed analysis of the engineering aspects and environmental effects of the hydroelectric concept. If such a system were feasible, the NPS would do further impact analysis of system design, location and construction, and extensive environmental analysis, as well as public involvement before a final decision was made and any implementation occurred.*

**Comment No. 3:** NPS should investigate alternative fuel sources, such as fuel cells and should use solar power at Kennecott. Electrical efficiencies should be explored. (#2)

**Response:** *The NPS will continue to consider the use of fuel cells and other alternative technologies as they become available, current fuel cell technology is not yet practical for the Kennecott location. If the NPS can find appropriate locations to site solar panel so they don't impact the historic setting, solar power would be utilized as well. Electrical efficiencies, including lighting, will be implemented as long as the NPS can meet accessibility requirements.*

**Comment No. 4:** Propane is less efficient and more flammable than diesel fuel. NPS should power generators with diesel fuel. (#2)

**Response:** *The 2005 Value Analysis cited in Section 1.5.8 of the EA evaluated both propane and diesel fuel and determined that the use of propane was less of an environmental risk than diesel. The condition of the McCarthy road, Kennecott River crossing, and storage facilities required were evaluated in the review of risk. Unlike propane, a diesel fuel spill in or around the waters feeding the Copper River could cause significant damage to fisheries. The NPS does not believe obtaining the greater BTU content per unit of diesel was worth this risk.*

**Comment No. 5:** Water tank location on a steep location is not safe. (#2)

**Response:** *As a result of the October 2006 flooding, the design of this facility and its location will be reevaluated at a later date and further environmental review completed as necessary at that time.*

**Comment No. 6:** A number of community members commented they would prefer that NPS employees find housing in the local community rather than the NPS build housing at the Operations Support Complex. Additionally, there were a number of comments that NPS employee housing did not need indoor plumbing and water. (PM)

**Response:** *Because there's an inadequate number of existing private housing available in the local community, the NPS will continue to implement a variety of housing options as noted in the EA (Section 2.2.1). Options include possibly purchasing and rehabilitating six privately owned historic houses if offered for sale by their owners, refurbishing NPS owned residences in*

*Kennecott, renting available units available in the community and constructing units at the Support Complex. NPS housing standards have specific requirements for indoor plumbing and water.*

**Comment No. 7:** Do not support the trail that would lead from the proposed campground along the glacier edge to Kennecott. The analysis of impacts of this trail did not address bear/human interactions. (#1, PM)

**Response:** *The NPS is no longer considering constructing this trail in the near term due to the current lack of funding and public support. If funding is obtained for the campground, this trail would be reconsidered with additional environmental analysis and public input.*

**Comment No. 8:** At the McCarthy Road Information Station, the West Side Glacier Trail should be re-routed to avoid potential trespass issues on adjacent private property. (#3)

**Response:** *This trail will be re-routed in 2007 or 2008 through this planning process. It is a high priority for the NPS, however, repairing trails in the Kennecott NHL that were damaged in the October 2006 flood will take precedence.*

**Comment No. 9:** There were a variety of comments regarding the van shuttle system between McCarthy and Kennecott. Numerous participants requested set schedules, longer hours of operation, more numerous trips during the shoulder season, further exploration of the need for a shuttle on the West Side of the footbridge and potential for the operation to be brought into the NPS concession program. Additionally, it was requested that the NPS work with the operator(s) to obtain grant funding to acquire vans that had bike rack and were wheel chair accessible. (WMA, PM, CL)

**Response:** *As stated in the KSFP, the NPS will work with local community to develop an efficient public shuttle system and adequate hours of operation. . The NPS has funding requests submitted to the NPS Alternative Transportation Program for the construction of the Shuttle Turnaround in Kennecott and will submit another request for accessible vans. As is possible, the NPS will continue to work with the operator(s) to facilitate schedules, operating hours, operation on the West Side and season length. In addition, the NPS will work along with the operator(s) on potential grant opportunities to assist with these issues. The NPS intends to work on these issues before entering into planning for concession contracts.*

**Comment No. 10:** The NPS should work with the State of AK DOT&PF to ensure maintenance to the road between McCarthy and Kennecott. (WMA, PM)

**Response:** *As noted in the Section 2.2.11 of the EA, the NPS will contact AK DOT&PF to facilitate a maintenance agreement.*

## LIST OF COMMENTERS

### **AGENCY LETTERS**

1. State of Alaska (AK)

### **ORGANIZATIONAL LETTERS**

1. Alaska Travel Industry Association (ATIA)

### **BUSINESS LETTERS**

1. Wrangell Mountain Air (WMA)

### **INDIVIDUAL COMMENT LETTERS**

- 1.
- 2.
- 3.

### **COMMUNITY LETTER (CL)**