

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

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



Finding of No Significant Impact

Kennecott Operations Plan

November 2013

Recommended:

Eric M. Weach **ACTING FOR: RICK OBERDRESSER** *11/28/13*
Superintendent, Wrangell-St. Elias National Park and Preserve Date

Approved:

[Signature]
Regional Director, Alaska

11/29/13
Date

FINDING OF NO SIGNIFICANT IMPACT

Kennecott Operations Plan

Wrangell-St. Elias National Park and Preserve, Alaska

November 2013

The National Park Service (NPS) has prepared an environmental assessment (EA) to evaluate management alternatives for the Kennecott Mines National Historic Landmark (NHL) in Wrangell-St. Elias National Park and Preserve. The Kennecott Operations Plan is a revision of the 2001 Interim Operations Plan for the NHL, which was written to develop management strategies when the NPS acquired portions of the privately owned NHL in June 1998. The purpose of the Kennecott Operations Plan is twofold:

- Provide long term guidance and protocols for an NPS/community partnership.
- Provide long term goals, guidance and management strategy for NPS-owned portions of the NHL. This includes historic structure preservation and stabilization, interpretation, NPS utilities and infrastructure, access/transportation, and vegetation management.

The NPS has selected Alternative 2 (the Preferred Alternative) because it best meets the purpose and need described on pages 2 – 5 of the Kennecott Operations Plan EA.

Public involvement during the three-year planning process was extensive. The public review EA was available for review and comment for 45 days. Nineteen comments were received from individuals, organizations, and agencies. These comments did not change the conclusions in the EA about the environmental effects of the action.

ALTERNATIVES

The EA evaluated four alternatives, including the Preferred Alternative.

Alternative 1: No Action Alternative

Under the No Action alternative, actions would be limited to maintaining the historic structures and landscape features as they exist today, with no additional treatment. Vegetation clearing for fire protection and viewshed improvement would not occur; no invasive plant monitoring and/or removal would occur; no maintenance of historic circulation/access routes would occur; no water system would be designed or constructed; and no additional trails or campsites in the area would be considered.

Alternative 2: NPS Preferred Alternative

Under the Preferred Alternative, historic structures will be managed to reflect a diversity of treatments. Some structures will be managed as ruins and allowed to deteriorate in place, some will be stabilized and preserved, and some will be rehabilitated to accommodate adaptive re-use. Preservation treatments will include painting and/or window replacement. Wherever possible,

archeological resources will be retained on the landscape. Vegetation clearing will be done around buildings for fire protection and will be done in selected areas to improve viewsheds. Some historical circulation routes will be improved and maintained as described below.

On transportation/access issues, NPS will work with the community to manage the NHL as a non-motorized visitor destination. NPS will work with the community on managing parking within the NHL. NPS will develop a 3.5 mile pedestrian trail along the east side of the Kennicott Glacier. For NPS Utilities and Infrastructure, power generation and distribution will be provided through propane and/or diesel generators, and will consider alternative sources. Details of the selected alternative are in the decision section of this Finding of No Significant Impact (FONSI).

Alternative 3: Management Concepts Alternative

Under this alternative, most historic structures would be managed within the “preservation” class of *The Secretary of Interior’s Standards for the Treatment of Historic Properties*. Treatments would emphasize interior stabilization and (where necessary) re-roofing, but would not include re-painting or window replacement. Wherever possible, archeological resources would be retained on the landscape. Vegetation clearing would be done only to maintain historical circulation routes. The NHL would continue to be monitored for invasive plants and populations of such would be manually removed, with no use of herbicides. No small scale features would be reconstructed.

NPS would work with the community to manage the NHL as a non-motorized visitor destination. NPS would not propose to develop additional parking but would work with the community on managing parking within the NHL. Under this alternative, NPS would develop 3.5 mile pedestrian trail along the east side of the Kennicott Glacier and would develop a walk-in campground. NPS would work with the community to consider the development of additional non-motorized trails in the area. For NPS Utilities and Infrastructure, no water system would be developed and power generation and distribution would be provided through propane, diesel generator, and consideration of alternative sources, primarily solar.

Alternative 4: Restoration Alternative

Under this alternative, historic structures within the Administrative Core zone would be restored or reconstructed to replicate 1938 conditions. In other zones, all structures would be stabilized and preserved and some would be rehabilitated to accommodate adaptive re-use. Preservation treatments would include painting and/or window replacement to provide weatherization in order to protect the public’s investment and ensure that buildings are standing for generations to come. Wherever possible, archeological resources would be retained on the landscape. However, any material associated with Consolidated Wrangell activities would be removed from the site. Vegetation clearing would be done around buildings for fire protection and would be done extensively within the Administrative Core, Commercial, and Industrial Core zones to replicate 1938 conditions and to improve viewsheds. Historic circulation routes will be maintained and enhanced. Some small-scale features would be restored.

NPS would work with the community to manage the NHL as a non-motorized visitor destination. NPS would not propose to develop additional parking in the NHL, but would work with the community on managing parking within the NHL. Under this alternative, NPS would develop

3.5 mile pedestrian trail along the east side of the Kennicott glacier and would develop a walk-in campground. For NPS Utilities and Infrastructure, a water system providing potable water and fire suppression capabilities would be developed; a sanitary sewer system would be developed; and power generation and distribution would be provided through propane, diesel generator, and development of a hydroelectric system.

PUBLIC INVOLVEMENT

Public involvement for the Kennecott Operations Plan began on September 8, 2010 with a public meeting in Kennecott. The general planning process and timelines were explained and public concerns and comments were noted.

On December 13, 2010, a scoping letter went out to 210 people and organizations. It formally announced the scoping period for the Kennecott Operations Plan, explained the purpose of the Plan, and invited comments. The park also posted the letter on the NPS Planning, Environment, and Public Comment (PEPC) website for public review and comment. The park asked for comments by January 31, 2011 and received comments from the McCarthy Area Council (MAC), National Parks Conservation Association, State of Alaska, Friends of Kennicott, Alaska Quiet Rights Coalition, and several individuals. A public meeting was held in Anchorage on February 23, 2011. The meeting included a presentation by the NPS Regional Historical Architect and an explanation of the planning process. Questions, comments, and concerns were noted.

In March of 2011, the park Interdisciplinary Team (IDT) met for three days to review public comment and develop a proposed action package for the NHL. Proposal issues included historic structure stabilization/preservation, interpretation, NPS utilities and infrastructure, transportation/access, vegetation management, and management of small scale features and archeological resources. The IDT also discussed a protocol for communications with the McCarthy/Kennecott community. The resulting proposed action package was made available to the McCarthy/Kennecott community and posted on the PEPC website for public review and comment in May 26, 2011. NPS asked for comments by August 31, 2011.

To facilitate review of the proposed action package, the MAC assigned a sub-committee to thoroughly review and comment on the document. The NPS held three public meetings in Kennecott/McCarthy during the course of the summer to answer any questions regarding the proposed action package. The community requested and was granted an extension on the comment period to September 15, 2011.

NPS received 31 written comment letters on the proposed action package. These included a MAC subcommittee re-write, which was signed or otherwise endorsed by 43 individuals. Friends of Kennicott also submitted a comment letter, generally supporting and supplementing the MAC subcommittee re-write. Comments were received from several other organizations or agencies, including Alaska Quiet Rights Coalition, the State of Alaska, and National Parks Conservation Association. The IDT met in October 2011 to review the public comments and modify the proposed action package, based on public comment. The modified version of that proposed action package was the basis for the preferred alternative identified in the EA.

During the summer of 2012, two public workshops were held in Kennecott to facilitate public input into the planning process. The first was held in June and included discussions of the management concepts, NHPA process, and Secretary of the Interior's Standards for Treatment of Historic Properties. The second was a 4-night session held in July and included discussions on parking, the shuttle turnaround, and vehicle access to the Kennecott mill town. These sessions were well-attended by individuals and area businesses. Ideas from both public sessions were incorporated into the preferred alternative of the Kennecott Operations Plan EA.

The public review EA was placed on the PEPC website on March 13, 2013. It was available for a 45-day public review and comment period. A cover letter announcing the posting of the document was sent to a project mailing list and articles appeared in the Copper River Record and Wrangell-St. Elias News. Public review resulted in 19 comments. Substantive comments are addressed in Appendix A of this FONSI.

DECISION

The NPS decision is to select Alternative 2 (Preferred Alternative). Alternative 2 includes all of the Actions Common to All Action Alternatives described on pages 26 – 34 of the EA. It also includes all items described under “Alternative 2: Preferred Alternative” on pages 39 – 60 of the EA. These sections of the EA, as amended in the Errata of this FONSI (Appendix A), are included in the Kennecott Operations Plan. The Kennecott Operations Plan is not attached to this FONSI but is available by request.

Specific Action Items

Communications

- 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.
- 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.
- 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.
- A park leadership team member will attend each MAC meeting. The park leadership team generally consists of the park superintendent and the division chiefs.

- 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 Kennecott website.
- Continuation of the annual Superintendent's letter.

Transportation/Access

Kennecott Arrival/Orientation

- 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.
- 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

- 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.
- 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.
- 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.
- 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.
- Websites: Can display information similar to brochures. Visitors use websites for trip planning.

Parking

- 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.
- 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.
- 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

- *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 subdivision 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

- 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.

NPS Utilities and Infrastructure

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.

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 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.

Vegetation

Thinning for Fire Protection

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.

- 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 management

- Continue physical control methods where effective.
- Allow limited use of herbicides to control infestations not responding to physical control methods.
- 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.

Administrative Core Zone

Circulation/Access

- 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.

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.

Hospital

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

Assay Office

- Stabilization: Move salvageable remains of the building back to its original location.

Railroad Depot

- Stabilization: Cyclic maintenance. Restore electrical systems.

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.
- 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.

- 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.

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.

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.

Concentration Mill

- 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.
- 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.

Leaching Plant

- 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.

- 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.

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.

Power Plant

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

Transformer House

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

Commercial Zone

Refrigerator Plant

- Stabilization: Cyclic maintenance. Re-construct cribbing walls.
- 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 users, and to install electrical, heating and plumbing services.

New Schoolhouse

- Restore classrooms after maintenance activity is removed from the building. Install chalk boards, refinish floors.
- 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.
- Small scale features: Hose house was rehabilitated and will be utilized to provide storage for fire suppression supplies.

Old Schoolhouse

- 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.
- 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.

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.

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. The landslide will be by-passed or a trail constructed through it.

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.

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.

South and North Silk Stocking Cottages

- Cyclic maintenance. Remove sauna above north cottage. Currently in use as park housing.

Residential B Zone

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.

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.

Kennecott Cottage 39B, Lot 87

- Stabilization: None, this building collapsed under the snow load in 2012. Consolidate collapsed material and manage as a ruin.

Other

Jumbo Transfer Station

- Stabilization: Work to include reroofing, wall and floor repairs, structural repairs.

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.

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.

Jumbo Mine/Root Glacier Outhouse

- 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.
- 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

- Develop a map of the cemetery that will be part of a self-guided tour.
- Fence maintenance/reconstruction.
- Brushing of native vegetation in order to define cemetery plots.
- Maintenance of grave markers.

Rationale for the Decision

Alternative 2 was chosen to be implemented because it best meets the purpose and need and the goals described in Chapter 1 of the EA. With its emphasis on community partnership and communication, it is a reflection of the community of McCarthy/Kennecott. Alternative 2 is the result of a planning process that included community workshops and numerous opportunities for public review and comment. It provides a balance between managing the NHL for a sense of abandonment vs. full restoration to replicate 1938 conditions. It provides for historic structure treatments while ensuring that significant historic structures are stabilized and maintained to be enjoyed for generations to come. It provides for improved visitor services in the area of the park that receives the most visitation.

Alternative 2 was chosen over Alternative 3 (Management Concepts) because it takes the extra step on external treatment of historic structures. After intensive internal stabilization, it seems wise to take the extra step to weatherize historic structures to protect the public's investment and ensure that these historic resources will be available for generations to come.

Alternative 2 was chosen over Alternative 4 (Restoration) for several reasons:

- Opposition to the alternative by most of the McCarthy/Kennecott community.
- Anticipated major adverse impact on visual resources resulting from the clearing of vegetation to replicate 1938 conditions.

- Anticipated high costs associated with reconstruction of structures that are now completely gone.

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.

1) Impacts 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.

Alternative 2 will result in minor impacts to water resources, transportation and access, and socioeconomics. It will have a moderate impact on vegetation, cultural resources, wildlife, visual resources and soundscape, and a beneficial impact to visitor use and experience.

2) The degree to which the proposed action affects public health or safety.

Alternative 2 will have a positive impact on public health and safety because of actions such as vegetation clearing for fire protection and installation of septic systems.

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.

This action will not significantly impact any rare or unique resources or values.

4) The degree to which effects on the quality of the human environment are likely to be highly controversial.

Implementation of Alternative 2 will not result in highly controversial effects on the quality of the human environment.

5) The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.

This action is not known to include any unique or unknown risks, and is not likely to result in any highly uncertain impacts to the human environment.

6) The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.

The implementation of Alternative 2 does not establish a precedent for future actions. It is unique to Kennecott Mines National Historic Landmark and will need to be revised in 10 – 20 years.

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 EA analyzed the cumulative impacts of past, present and reasonably foreseeable actions in the area, including intermixed private lands. Implementation of Alternative 2 will not result in major or significant cumulative impacts.

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.

Alternative 2 describes management of the Kennecott Mines National Historic Landmark. While the actions described may result in some loss and/or displacement of archeological resources and introduction of non-historic elements, preservation of historic structures will provide a beneficial impact to the NHL.

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.

No endangered or threatened species have been recorded in the project vicinity.

10) Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment.

No federal, state, or local laws or requirements imposed for the protection of the environment will be violated by implementing this action.

FINDINGS

The selected alternative complies with the Endangered Species Act, the National Historic Preservation Act, the Clean Water Act, the Clean Water Act, the Wilderness Act, the Alaska National Interest Lands Conservation Act (ANILCA), and Executive Orders 11988 for floodplain management, 11990 for protection of wetlands, 12898 for environmental justice and 13514 for energy efficiency. There will be no restriction of subsistence activities, as documented by the ANILCA Title VIII Section 810 Summary Evaluation and Findings appended to the EA.

The National Park Service 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.

APPENDIX A

NPS Response to Public Comments and Errata for the Kennecott Operations Plan Environmental Assessment

The NPS has read and considered all comments received. Responses to substantive comments are provided below. A substantive comment is defined as one which leads the NPS to: (1) modify an alternative, including the proposed action; (2) develop and evaluate an alternative not previously given serious consideration; (3) supplement, improve, or modify the environmental analysis; (4) make factual corrections; or (5) explain why comments do not warrant further agency response (CEQ NEPA Regulations 1503.4).

NPS received comments from the State of Alaska (ANILCA Implementation Program) and the State Historic Preservation Officer. Groups submitting comments included the Alaska Quiet Rights Coalition, Friends of Kennicott, and National Parks Conservation Association. We also received comments from 13 individuals and one comment letter with eight signatures of millsite subdivision residents. Comments may be grouped with like comments or paraphrased for conciseness.

NPS RESPONSE TO PUBLIC COMMENTS AND ERRATA

The comments are paraphrased and the NPS responses follow them. This errata provides clarifications, modifications or additional information to the EA and to the selected alternative, Alternative 2. These amendments do not significantly change the impact analysis of the EA and, therefore a new or revised EA is not needed and will not be produced.

Agencies and Organizations:

1) State of Alaska: The plan indicates that due to the presence of an abundance of soapberry bushes in the proposed location, the campground may need to be closed during July and August when bears are feeding in preparation for hibernation. Given the limited visitation window for the area and July and August being high visitation months, we question whether the proposed location is appropriate. Alternatively, to avoid a campground closure, the Service should evaluate the availability of soapberries throughout the general area and consider clearing the campground vicinity of the attracting vegetation.

NPS response: The selected action has been modified to remove the new campground.

2) Alaska Quiet Rights Coalition: We would not like to see new trail development in lieu of strict regulation of motorized vehicle use.

NPS response: Implementation of the Preferred Alternative includes construction of a 3.5 mile pedestrian trail on the east side of the Kennicott Glacier. This trail will provide a non-motorized “link” for those visitors wishing to hike from the McCarthy area to Kennecott.

3) Alaska Quiet Rights Coalition: We would like to point out, however, that tolerance or lack of tolerance for non-natural sounds (noise), depends not only on expectations, as NPS pointed out, and loudness (decibel level), but probably equally on variations in the pitch of the sounds.

NPS response: Comment noted for future soundscape analyses. Variation in pitch is not discussed in this EA because the sounds logged during the monitoring sessions were generally steady and did not vary in pitch.

4) Alaska Quiet Rights Coalition: We strongly recommend that visitors be prohibited from riding 4-wheelers there (Kennecott Mines National Historic Landmark), and that they be used by residents only for transportation, hauling firewood and supplies, etc., and not for purely recreational purposes. We very much support NPS's pedestrian emphasis for the area.

NPS response: Access to Kennecott from the footbridge involves rights-of-way (see pp. 95 and 96 of the EA) where ORV use is a state and community issue. The state right-of-way ends at the entrance of the Kennicott Subdivision. The roads within the Kennicott Subdivision are easements across private and NPS lands. Neither individual Kennicott Subdivision lot owners nor the NPS have authority to unilaterally impose restrictions on the use of the easements (EA, page 95). NPS does not prohibit ORV use, but instead works with the community and the visiting public regarding visiting the NHL in a non-motorized fashion.

5) Alaska Quiet Rights Coalition: I didn't notice anything in the document about small plane or helicopter flightseeing (as opposed to small plane use for backcountry trips or transportation to and from McCarthy, uses which are less likely to be a problem—although at high levels they could of course become a problem). At Denali National Park, in Juneau, and elsewhere (including areas Outside), flightseeing trips are hugely obtrusive and very significantly degrade, depending on the location, the natural and backcountry park experience, or the lives of local residents. Additionally, they are incredibly difficult, under present laws and regulations, to manage. We hope the possibility of flightseeing creating very serious problems for the NHL in the future (we're not really familiar with the present situation) is on NPS's radar and that it will do whatever it can to prevent flightseeing trips from greatly spoiling the experience of visitors and substantially reducing the quality of life for area residents.

NPS response: Some flightseeing by fixed wing aircraft is offered by local vendors out of McCarthy. According to data taken in the sound logging sessions, small planes were audible between 5 and 20 percent of the time during the sessions (EA, pp. 98 – 103). At this level, we have heard no complaints from visitors or the community. Helicopter-supported flightseeing out of the McCarthy airport will likely receive strong opposition from the community.

Individuals

6) Comment: Long-term care of the Kennicott cemetery should be improved, and NPS interpretation of the cemetery should include on-site information about its "residents."

NPS response: Under the Preferred Alternative, NPS will consider developing a map of the cemetery that will 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 (EA, page 60). The NPS recently completed a Cultural Landscape

Inventory (CLI) of the Kennecott cemetery which includes recommended treatments. The park will utilize the CLI in developing treatments for the cemetery.

7) Comment (signed by nine residents of the Kennicott Subdivision): Regarding public safety on the subdivision rights-of-way, along with the related liability issues, our July 23, 2010 letter to the superintendent pointed out, “motorized use on the narrow, steep, and winding easements also used by pedestrians poses a clear and growing public safety issue.” The plan should state clearly that the NPS will respond to the full extent of its legal authority to protect safety on subdivision rights-of-way and to minimize liability exposure of local landowners, including limitations on motorized use of the rights-of-way by park visitors.

NPS response: The actions in the Preferred Alternative identified on pages 31 – 33 of the EA were developed to meet the community-developed vision. Access to the millsite subdivision is predominantly by shuttle services or by non-motorized means. Vehicle access and parking will be managed to minimize impacts to visitors and residents, minimize congestion and maximize safety. NPS will continue to take an active role in promoting this vision through the identified actions.

8) Comment: Regarding Silk Stocking Row, we recommend reconstruction of the boardwalk in front of the four northern cottages to restore the site to its historic period of significance. Within the Administrative Core Zone, every point where there is a missing building needs to have a footprint of that structure re-established as a flat area with the idea that at some point any one of these structures could be rebuilt.

NPS response: Reconstruction of this boardwalk and the missing structures was considered but is not included in the Preferred Alternative for the following reasons: 1) specific public comment from an adjacent lot owner opposing the idea because of parking concerns; 2) public comment regarding other private lots along or adjacent to Silk Stocking and the desire that the NPS not make Silk Stocking a visitor destination; and 3) cost. Reconstruction of the Staff House, Superintendent’s Residence, and Stephen Birch House were considered in Alternative 4. The Preferred Alternative calls for maintaining historic circulation routes through the Administrative Core of Kennecott. There will be opportunities to do vegetation clearing and interpretation at the sites of these historic structures.

9) Comment: Section 2.3.2.5, Other, includes the Jumbo Transfer Station, the Jumbo Aerial Tramway and the Cemetery and I am pleased these resources have been included in the preferred alternative. However, a correction is needed. The 2008 stabilization efforts were made to the Jumbo transfer station bunkhouse, not the transfer Station itself. The transfer station has not been stabilized to date but does merit immediate stabilization measures including a new roof and structural repairs. The importance of stabilizing this contributing cultural resource goes well beyond preservation; if the structure fails, the aerial tramway cables will pose a substantial safety risk to visitors and landowners.

NPS response: Correction noted. The text in the Kennecott Operations Plan will be modified. For the Jumbo transfer station, the Preferred Alternative calls for reroofing, wall and floor repairs, and structural repairs.

10) Comment: Consider re-establishing a crossing of National Creek at or above the old dam site. This would allow property owners along Bonanza/Jumbo road to access their properties with vehicles without traversing the core area of the millsite and the Root Glacier Trail.

NPS response: While this action could alleviate some local traffic from the core area of the millsite, it will introduce a non-historic feature into the landscape of a National Historic Landmark.

11) Comment: Suggest amending the proposed parking area to include parking for lot owners who do have access to their property to encourage them to park in a designated area instead of along the ROWs.

NPS response: The Preferred Alternative provides for a designated parking area for lot owners with no property access (EA, page 33).

12) Comment: Accessible boardwalks should be re-established where possible to provide an appropriate character and greater definition of circulation routes.

NPS response: Restoration of boardwalks throughout the administrative core was considered. It was rejected due to cost and as a balance between restoration and management.

13) Comment: Water System: Planning should consider the impact of providing power to the water source (well?) and the impact of construction of water lines on the Bonanza/Jumbo ROW. I am very supportive of “construction/installation of a potable water/fire suppression system” for Kennecott (regardless of which alternative is chosen). Realize that lot 76 has a large elevated steel tank that could possibly (through a partnership agreement) be incorporated into a designed system which might eliminate the need for “construction of a water holding tank that would be an Adverse Effect to the landscape because of introduction of a non-historic element” (as noted top of page 126, first complete sentence) under Alternative 2.

NPS response: The Kennecott Operations Plan/EA describes the NPS intent to install a water system to provide potable water and limited fire suppression capabilities. However, the design for the water system is still underway and this EA does not serve as the NEPA compliance document for the water system. Your concerns will be addressed in a site-specific NEPA compliance document.

14) Comment: Jumbo Mine Tramway: Consider clearing and brushing the tramway corridors to re-establish and reinforce this significant linear feature of the mine site. Efforts should be made to stabilize all remaining tram towers and structures.

NPS response: The Preferred Alternative proposes stabilization of the NPS-owned lower portion of the tramway system. Stabilization will include replacement of the deteriorated structural members on tram towers, capping of column members with metal to prevent further deterioration, and bracing and reaffixing missing connections. Brush removal will occur around NPS owned towers. The portion of the tramway visible from the tram terminus will be brushed

so that the tramway system is evident. This action is dependent on possible NPS acquisition of Lot 65 above the tram terminus.

15) Comment: Kennecott is ideally suited to a hydroelectric power supply project due to several available water sources, a “summer season” operation, historical use of hydroelectric power within Kennecott itself, and the reality of high energy costs at this remote site. I would champion a hydroelectric power generation and distribution plan in the NHL, especially since hydro power was used in Kennecott in the past and would likely produce ample “quiet” power needs during the peak summer season.

Use solar power to supplement the existing generator.

NPS response: Under the Preferred Alternative, “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 alternative energy sources of power generation including hydro and solar power at Kennecott NHL.”(EA, page 58). Development of hydroelectric power will be positive for all the reasons you cite. Community concerns regarding the effects of water withdrawal from National and/or Bonanza Creeks will need to be addressed.

16) Comment: While I may support future change to the composition of the Architectural Control Committee (ACC) and to voting procedures, I do not believe the ACC should be controlled entirely by a few board members who are subject to NPS appointment.

NPS response: The Preferred Alternative states: “The NPS, as a lot-owner in the millsite subdivision, has been and will continue to be a willing participant in future efforts to revise the covenants.” (EA, page 28)

17) Comment: I support good signage but I don’t see any addressing of sign replacement, maintenance, or repair when needed. Good signage needs to be maintained and repaired and/or replaced (when damaged) if it is to continue to effectively communicate. Furthermore, damaged or defaced signs that are not attended to promptly communicate many negative messages to everyone who sees those damaged signs.

NPS response: Thanks for the comment. Though not identified in the Kennecott Operations Plan, the park currently has a list of assets that includes sign locations and dates of installation. This is used to prioritize maintenance and request funding. The park has identified the need to take a further step park-wide to identify maintenance needs for specific signs.

18) Comment: Parking (top bullet) talks about limited 10-space designated parking in the dairy barn area. Bullet #2 then talks about “designated public parking in the dairy barn area”; bullet #5 talks about an education campaign informing the public of the “lack of public parking in the NHL.” This dialogue above seems a bit unclear.

NPS response: The limited 10-space parking area is not intended to meet public demand. Instead, NPS will continue to support educating the visiting public about accessing Kennecott in

a non-motorized fashion, utilizing shuttle bus services. As described on page 33 of the EA, the 10-space parking area will provide parking, prioritized in the following order: “handicapped; local use for non-shuttle times; special events; visitors; and lot owners with no property access.” Private land owners in the Kennecott/McCarthy area have and may continue to develop commercial parking in the area.

19) Comment: Open up the transformer house to self-guided tours?

NPS response: Exterior repairs and landscaping to improve drainage are proposed under the Preferred Alternative (page 49 of the EA). The interior of the building could eventually be made available for self-guided tours, with possible limited access to the second floor in order to protect removable cultural resources.

20) Comment: This statement, “The residents have specifically requested that the park notify non-local visitors to the NHL that they are welcome to use the rights-of-way on foot or bicycle, but that ORV, motorcycle, and motor vehicle use by the general public within the subdivision is not allowed”—these specific words need to be more accurate. “Residents” needs a modifier such as possibly “many” or “most” because not all the residents specifically requested this. Furthermore, the final words “not allowed” should possibly be changed to “not welcome”.

NPS response: “Residents” as used in this paragraph refer to “the majority of landowners” as stated at the beginning of the paragraph. The words “not allowed” are an accurate reflection of the wording of the Kennicott Subdivision covenants, which state “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 for the public in general.”

21) Comment: Off Road Vehicle Use: Currently ORV use is problematic. It is illegal to travel the McCarthy/Kennecott road on an ORV and ORVs cannot be driven across the Kennicott River foot bridges. Yet Kennecott Subdivision lot owners can extend an invitation to their guests and make use of the easements within the Kennecott Subdivision. The only logical and responsible position on ORV use in the NHL is an all-or-nothing position.

NPS response: We agree and will welcome a community-driven approach to the issue as you suggest.

22) Comment: Existing Sound Levels: The only reference in the EA to ORVs is this statement about the noisy “early morning commute” associated with NPS ongoing stabilization work. Many of these ORV commuters are in fact NPS employees. On page 32 it states, “The community expects NPS to set an example regarding motorized access.” The NPS needs to start by setting that example by stipulating no ORV use by its employees and contract workers within the NHL.

NPS response: The EA (page 32) states that “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.” The park acquired a van in the spring of 2013 and is using it to facilitate a more effective employee shuttle. The park will

continue to work on this issue to minimize ORV use by NPS employees and contractors. Page 52 of the EA describes the operations of the Blackburn School House to provide a visitor orientation contact station. The law enforcement ORV that has been staged there will be moved to another location.

23) Comment: We are concerned about the plan for the work on the tram terminal on the top side of the concentration mill. The plans should call to stabilize the cable wires and tower leading into tram terminus.

NPS response: The plan calls for stabilization of the cable wires and stabilization of the tram terminus.

24) Comment: I do not support any restrictions regarding who visits the park and by what means. I feel it is open to the public and that we do not have or should have the authority to dictate who is able to experience it. To say that it is primarily a walking community is misleading when visitors arrive and see that there are vehicles here.

NPS response: With the exception of possible speed and parking limits on NPS owned portions of the Kennecott Subdivision easements, the Preferred Alternative does not impose restrictions on access that do not already exist (see pages 95, 96 of the EA).

25) Comment: I do not agree that the NPS has full community support to launch a campaign to educate the public on a “vision” that was developed by MAC (McCarthy Area Council) which does not represent the community at large. There are many long time residents of the valley and even business owners who are not active members of MAC. I support the freedom of all individuals to access the area by the means of their choice whether a resident or visitor of the park.

NPS response: The vision statement regarding motor vehicle use within the NHL referred to on page 31 of the EA was not developed by the McCarthy Area Council, rather it was developed as part of a four-evening series of public meetings. These meetings were attended by local residents, some of who are not MAC members. The NPS recognizes that the community is divided on this issue and that the vision statement does not reflect the attitudes or opinions of everyone in McCarthy/Kennecott. Because of the complexity of the issue, NPS has taken a role of supporting the community in management of access whenever we can. However, we will continue to educate visitors who are planning a trip to the area to come, park at the footbridge, and utilize local shuttle services to access Kennecott.

26) Comment: I believe historic USGS maps of the area show that it is the “Bonanza Road” and that it is not technically a walking trail as referenced in the document.

NPS response: The Bonanza trail was historically used to freight supplies to the Bonanza mine, prior to construction of the aerial tramway. It is currently used by visitors as a pedestrian trail but is also an easement within the Kennecott Subdivision. As such, the EA acknowledges the easement is “for permitted uses of motorized vehicles by local residents and their guests and for subsistence activities.” (page 57, EA).

27) Comment: The exceptional tramway systems at Kennecott should be the focus of increased attention and preservation efforts.

NPS response: For the Jumbo Mine aerial tramway, the Preferred Alternative proposes stabilization of NPS-owned lower portion of the tramway system. Stabilization will 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. Brush removal will also be done around NPS owned tram towers and the lower portion of the tramway visible from the tram terminus.

28) Comment: The Jumbo Transfer Station contains fascinating equipment and could be preserved as a remote ruin.

NPS response: For the Jumbo transfer station, the Preferred Alternative proposes “reroofing, wall and floor repairs, and structural repairs.”

29) Comment: The Jumbo transfer station bunkhouse needs roof repairs, flooring repairs, and should have replacement windows, doors, and animal protection.

NPS response: Volunteer stabilization efforts will need to suffice until the next planning cycle. Given the realities of funding and accomplishing a very ambitious program of work described in the Preferred Alternative, outlying structures associated with the tram and/or mines did not receive a high priority. If funding becomes available, the park may tier off the Kennecott Operations Plan with a separate and smaller planning document to address these outlying historic structures.

30) Comment: Clear vegetation where practical over the entire “Staff Row,” just as it was done historically. Much of the Staff Row area was destroyed by Consolidated Wrangell when that company decided to use that area for processing of the ore they removed from the Bonanza Slide area. Broken rocks constitute a walking hazard and give this area an unsightly appearance. However, the remaining waste ore can be used for re-contouring the entire Staff Row area and south to the hospital ruins.

NPS response: Your suggested level of vegetation clearing was considered in Alternative 4 of the EA. The EA concludes that this level of vegetation clearing will result in moderate impacts to vegetation and a major impact on visual resources. For these reasons vegetation clearing at this scale was not chosen. Vegetation will be thinned to enhance viewpoints and to maintain historic circulation routes. Suggested contouring will be impossible without vegetation clearing.

31) Comment: Once contouring has been accomplished, the main west-to-east walkway needs to be rebuilt. A second green line shows the historic pathway that connected Staff Row to the south side of National Creek. The NPS should take a look at this route as well.

NPS response: Alternative 4 of the EA proposed restoration of the boardwalk walkway you suggest. The Preferred Alternative will maintain historic circulation routes in this area without the extent of vegetation clearing or re-contouring you suggest.

32) Comment: The only other structure we have which we can use for interpretation is The Staff Annex, otherwise known as the National Creek bunkhouse, has been left to the elements. Because of its historic relevance, this building needs to be set for eventual restoration.

NPS response: The National Creek Bunkhouse received extensive damage in the 2006 flooding of National Creek. Under the Preferred Alternative, this historic structure will be internally stabilized and re-roofed.

33) Comment: The hospital: More attention will have to be paid to the north and west faces of the hospital once the vegetation is cleared and the wooden walkway is rebuilt.

NPS response: The Preferred Alternative proposes interior stabilization and roof maintenance on the hospital, but no interior access.

Additional Errata

NHPA 106 Compliance

The Kennecott Operations Plan calls for numerous activities which, under the National Historic Preservation Act, Section 106, may potentially adversely impact historic properties. Throughout the development of the plan, the park has consulted with the State historic Preservation Officer (SHPO). Many of the plan's activities will be covered under the existing park-specific Kennecott NHL Programmatic Agreement (PA) with SHPO. Given the complexity and number of proposed activities in the plan, the park has an understanding with SHPO that when a specific plan activity is going to be implemented, the park Section 106 coordinator will determine if that activity is covered by the park-specific Kennecott PA, the 2008 NPS Nationwide PA, or will require the full Section 106 process.

APPENDIX B

Determination of Non-Impairment for the Kennecott Operations Plan Environmental Assessment

A determination of impairment is made for most of the resource impact topics carried forward and analyzed in the environmental assessment for the preferred alternative. The description of park significance in the *2009 Wrangell St. Elias National Park and Preserve Foundation Statement* was used as a basis for determining if a resource is:

- Necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park, or
- Key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or
- Identified in the park's general management plan or other relevant NPS planning documents as being of significance.

Impairment determinations are not provided for visitor opportunities, transportation/access, or socioeconomics because impairment determinations relate back to park resources and values. These impact areas are not considered to be park resources or values.

Water Resources

Protection of fish habitat and protection of populations of fish are specifically identified as park purposes. Protected salmon habitat is identified as one of the significant resources that defines what is most important about the park's resources and values and is tied to the park purpose. Healthy fisheries are necessary to fulfill the purposes for which the park was established and are key to the natural integrity of the park. However, no fish have been inventoried in Bonanza, Jumbo, National Creeks and the Kennicott River. These are creeks that will most likely be impacted by actions described in the preferred alternative.

Under the preferred alternative, direct and indirect effects on water resources will be minor because of the temporary duration and low intensity of the impacts. These impacts will not result in impairment.

Vegetation

Management for vegetation is not specifically identified as a purpose in the establishing legislation of the park and vegetation is not specifically identified in the park's general management plan as being of significance.

Under the preferred alternative, vegetation thinning and removal will be done to facilitate improved viewsheds, protection from wildland fire, trail clearing and maintenance, and infrastructure development. This will result in 5 acres of vegetation clearing or thinning. Direct and indirect effects on vegetation will be moderate because impacts are generally long-term, low

to medium intensity, and affect a common park resource. These impacts will not result in impairment.

Cultural Resources

Protection of cultural resources is not specifically identified as one of the park's purposes in the establishing legislation of the park (prior to the NPS acquisition of lands in the Kennecott Mines NHL). However, the Kennecott Mines NHL is specifically identified as a fundamental resource and value of the park in the *2009 Wrangell St. Elias National Park and Preserve Foundation Statement*. Proposed management of the NHL has been and will continue to be targeted at the stabilization and preservation of the cultural landscape associated with the Kennecott mines and mill town.

Because of the introduction of non-historic elements, some actions proposed in the preferred alternative will result in an adverse effect to the cultural landscape. Additionally, some archeological resources will be displaced from the landscape as a result of historic structure stabilization. These will be long term, medium intensity impacts to an important park resource and will result in moderate impacts to cultural resources. These effects will be off-set by the positive effect from the stabilization of historic structures and cultural landscape elements. Overall, the impacts to cultural resources from the implementation of the preferred alternative will not result in impairment of cultural resources.

Wildlife

Protection of habitat for, and populations of, wildlife including but not limited to caribou, brown/grizzly bears, Dall sheep, moose, wolves, trumpeter swans and other waterfowl, and marine mammals is specifically identified as a park purpose. Unimpacted wildlife, unfragmented habitat, and native species are all identified as significant resources that define what is most important about the park's resources and values and is tied to the park purpose. Healthy wildlife habitat and populations are necessary to fulfill the purposes for which the park was established and are key to the natural integrity.

Proposals considered in the preferred alternative will have a minor impact on wildlife habitat. Direct and indirect effects on wildlife will be moderate because of impacts on bear habitat and habituation associated with the campground and Kennicott glacier trail. Because these impacts will not impact the continued viability of wildlife populations in the area or in the park, these impacts will not result in impairment to wildlife habitat or populations.

Visual Resources

"To maintain unimpaired the scenic beauty and quality of high mountain peaks, foothills, glacial systems, lakes and streams, valleys, and coastal landscapes in their natural state" is identified as a park purpose. However, the management goal for the Kennecott Mines NHL, as stated in Chapter 1 of this EA, is to stabilize, preserve, and interpret the key patterns, relationships, and remaining structures and features that define the historic, cultural and natural character of the NHL.

Within the milltown, the direct and indirect effects resulting from water system development, vegetation clearing, historic structure stabilization, and painting of historic structures will result

in a moderate impact to visual resources. These impacts may be perceived negatively to a local resident who sees them as a change; on the other hand they may be perceived positively by a park visitor who sees stabilized and preserved historic structures rather than dilapidated structures on the verge of collapse. Regardless, these impacts do not represent impairment to visual resources, particularly when viewed through the context of effects to the surrounding glacial wilderness.

Soundscape

Soundscape is not identified as a park purpose or as a significant park resource, either in ANILCA or in the general management plan for the park.

The preferred alternative, because of the continuation of stabilization efforts over the next five years, will have temporary, high intensity impacts on a soundscape that, within the Kennecott millsite, is far from natural. These moderate impacts will not result in impairment of the natural soundscape.

Summary

Implementation of the Kennecott Operations Plan, with the identified stipulations and mitigation measures, will not result in impacts that constitute impairment under the NPS Organic Act of 1916. Adverse impacts as a result of implementing the Preferred Alternative in the EA to the resources and values whose conservation is: necessary to fulfill specific purposes identified in the establishing legislation of the park; key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; or identified as significant in the park's general management plan or other relevant NPS planning documents; will not rise to levels that would constitute impairment.

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