



Elkmont Historic District

Final Environmental Impact Statement and General Management Plan Amendment

Volume 2

Public Comments

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Final Environmental Impact Statement and
General Management Plan Amendment
for the
Elkmont Historic District

Great Smoky Mountains National Park
North Carolina and Tennessee

Great Smoky Mountains National Park was authorized by Congress on May 22, 1926, and was officially established on June 25, 1934, to preserve one of the last remnants of relatively undeveloped land in the southern Appalachian Mountains and to provide a national park for populations living east of the Mississippi River. Unlike most western national parks that were created from federally held lands, Great Smoky Mountains National Park required lands to be purchased from private property owners. Elkmont properties were purchased in the 1920s and 1930s and through a series of leases were occupied until 1992, 1996, and 2001.

The last *General Management Plan* for the park was completed in January 1982. The 1982 plan calls for the removal of all buildings at Elkmont under private lease upon the expiration of those leases and for building sites to be returned to a natural state. In 1993, buildings within Elkmont were determined eligible for listing in the National Register of Historic Places, and in 1994 Elkmont was placed on the National Register as a historic district. This Environmental Impact Statement was initiated to investigate alternatives to complete removal of all buildings at Elkmont and to possibly amend the 1982 plan.

This document examines seven alternatives for managing the Elkmont Historic District for the next 15 to 20 years, including a no-action alternative. It also analyzes the impacts of implementing each of the alternatives. The “no-action” alternative is the 1982 *General Management Plan* and serves as a basis for comparison in evaluating the other alternatives. **Alternatives A through F** assess a range of options for the district from complete removal of all buildings to preservation and rehabilitation of all but one of the contributing buildings and most of the non-contributing buildings for operation as a restaurant and to provide overnight lodging. Natural resources preservation and restoration also depend on the specific alternative and range from complete restoration to limited preservation.

The sensitive natural and cultural resources that exist within the study area present considerable complications for determining the best future management option. Alternatives with greater levels of historic preservation have greater adverse impacts on natural resources, and alternatives that provide greater protection of natural resources have greater adverse impacts on cultural resources. Alternative C was identified as the preferred alternative because it provides the greatest balance in preserving important natural and cultural resources and would provide additional visitor opportunities.

This *Final Environmental Impact Statement and General Management Plan Amendment* has been distributed to other agencies and interested organizations and individuals for their review. Following a 30 day no-action period, a “Record of Decision” on the final approved and amended management plan will be issued by the NPS regional director. For further information on this document, contact the Superintendent, Great Smoky Mountains National Park, 107 Park Headquarters Road, Gatlinburg, Tennessee 37738.

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Public Comments



6.1 PUBLIC COMMENTS ON THE DRAFT PLAN AND AGENCY RESPONSES

6.1.1 Introduction

Solicitation of public comment on draft plans for National Park Service undertakings is required under the National Environmental Policy Act. Further, the National Park Service must “assess and consider [the resulting public] comments both individually and collectively.” Most importantly, such comments are viewed by the National Park Service as critical in helping park managers shape responsible plans for our national parks that best meet the Service’s mission, the goals of NEPA, and the interests of the American public. During the formal comment period the public can review and comment on a draft plan’s alternative proposals for achieving stated goals. The comments received are analyzed and the results considered by park management while developing the *Final General Management Plan Amendment/Environmental Impact Statement*.

The remainder of this chapter addresses the public involvement process for the *Draft General Management Plan Amendment and Environmental Impact Statement*. This includes presentation of the substantive public comments received and responses to those comments by the National Park Service.

6.1.2 Availability of the Draft Document

The public was notified of the availability of the two-volume *Draft General Management Plan Amendment and Environmental Impact Statement* through the *Federal Register* on January 30 and February 10, 2006. The official 90-day public review and comment period began following the February 10, 2006 announcement. The *Federal Register* announcements provided information to the public about how they could obtain copies of the document through the park or online via an internet site.

Press releases were sent to the media announcing the availability of the document, and the park produced and distributed a newsletter to those on the project mailing list which also announced the availability of the draft document and ways in which copies could be obtained.

6.1.3 Agencies and Organizations to Whom this Draft Document or the Notice of Availability of this Document Was Sent

6.0 PUBLIC AND AGENCY COMMENTS

6.1.3.1 Federal Agencies

Advisory Council on Historic Preservation
Environmental Protection Agency

Tennessee Valley Authority

U.S. Fish and Wildlife Service

U.S. Army Corps of Engineers

6.1.3.2 American Indian Tribes

The Eastern Band of Cherokee Indians

The Chickasaw Nation

6.1.3.3 U.S. Senators and Representatives

Senator Lamar Alexander

Senator William H. Frist

Congressman John J. Duncan, Jr., Second District

Congressman Bill Jenkins, First District

Congressman Zach Wamp, Third District

6.1.3.4 State Government

Governor Phil Bredesen

William C. Clabough, Tennessee Senate

Tommy Haun, Tennessee Senate

Richard Montgomery, Tennessee House of Representatives

Ronnie Davis, Tennessee House of Representatives

Tennessee Department of Environment & Conservation

Assistant Commissioner

Commissioner

Division of Natural Heritage

Division of Water Pollution Control

Tennessee Historical Commission; State Historic Preservation Officer

Tennessee Division of Archaeology

Tennessee Wildlife Resources Agency

Policy Office

Tennessee Department of Tourism Development

University of Tennessee; Dept. of History

University of Florida; College of Liberal Arts & Sciences

Samford University; Birmingham, AL

6.1.3.5 Local Governments

Anna Porter Public Library; Gatlinburg, TN

Blount County, TN

City of Gatlinburg, TN

City of Maryville, TN

Cocke County, TN

City of Pigeon Forge, TN

City of Pigeon Forge, TN

City of Pittman Center, TN (is Pittman Center incorporated?)

City of Sevierville, TN

City of Townsend, TN

Maury Middle School; Dandridge, TN

Metropolitan Nashville Public Schools

Oliver Springs Elementary School, Oliver Springs, TN

Pigeon Forge Department of Tourism

Sevier County, TN

Sevier County Sheriff's Office; Sevierville, TN

6.1.3.6 Organizations, Businesses and Media

6.0 PUBLIC AND AGENCY COMMENTS

321 Action

AAA East Tennessee

AOI Corporation

Bass, Berry & Sims PLC

Blue Ridge Trail Riders, Inc.

Brinkley, Jones & Morris Architects, Inc.

CB Richard Ellis

Chattanooga Nature Center & Reflection Riding Botanical Garden

Chattanooga Times Free Press

Cherokee Forest Voices

Elkmont Preservation Committee

Executive Evolution

Foothills Land Conservancy

Friends of Great Smoky Mountains National Park

Gatlinburg Chamber of Commerce

Gatlinburg Inn

Goody's Family

Great Smoky Mountains Institute at Tremont

Great Smoky Mountains Natural History Association

Hill Studio PC

Ijams Nature Center

Jacobs Engineering Group

Johnson City Press

Knoxville News Sentinel

League of Women Voters of Tennessee

Looney Ricks Kiss Architects, Inc.

M.L. Underwood Construction

Mainstay Suites

Mountain Press

MTSU Center for Historic Preservation

National Parks Conservation Association

National Trust for Historic Preservation

Newport Plain Talk

North Carolina Park, Parkway and Forest Development Council

Now & Then, The Appalachian Magazine; ETSU Center for Appalachian Studies

Orthodontics & Dentofacial Orthopedics
Roan Mountain State Park
Save Our Cumberland Mountains
Sea Ray of Knoxville
Sierra Club
Smoky Mountain Convention & Visitors Bureau
Smoky Mountains Hiking Club
Southern Alliance for Clean Energy
Southern Appalachian Man and the Biosphere
Tennessee Citizens for Wilderness Planning
Tennessee Conservation League
Tennessee Great Smoky Mountains Park Commission
Tennessee Scenic Rivers Association
Tennessee Star Journal
Tennessee Wildlife Center
The Daily Times
The Hermitage
The Izaak Walton League
The White Stone Group, Inc.
WIVK
WBIR-TV
WKOP-TV
WSEV
WUOT Radio
WMYU
WSJK
WVLT-TV
WATE-TV

6.1.3.7 Individuals

6.0 PUBLIC AND AGENCY COMMENTS

There are more than 2100 individuals to whom copies of this EIS were sent or notification as to the availability of this EIS was sent. A complete listing of these names is available from the Superintendent, Great Smoky Mountains National Park, 107 Park Headquarters Road, Gatlinburg, Tennessee 37738

6.2 REVIEW OF THE DRAFT DOCUMENT

The public could submit written comments online or by mail. During the review period, the park publicized two public meetings through a project newsletter and local media. The first meeting was held on Saturday, March 25, 2006, in Gatlinburg, Tennessee; and the second on Monday, March 27, 2006, in Knoxville, Tennessee. Following the formal comment period, the park met with the consulting parties on June 20, 2006.

The public meetings were structured into two formats. An open house format was used initially to allow the public to view informational displays of the planning alternatives, with park staff available to respond to comments and questions. Then a structured public meeting format followed where members of the public could present and submit formal written or oral comments for the record. Court recorders were present to record public testimony. Thirty people signed in at the Gatlinburg meeting and seven provided formal comments. Forty nine people signed in at the Knoxville meeting and twenty six provided formal comments.

In addition to the public meeting comments, the park received 193 public comment letters or electronic messages on the *Draft General Management Plan Amendment/Environmental Impact Statement*. Comments were received from government agencies, organizations, and the general public.

This section presents substantive public comments representative of all received on the draft plan, direct quotes from the public to help characterize the concern, and agency responses. The use of representative statements was done to limit repetition, as many of the same concerns were heard from several commenters. Following the summary comments and responses is a presentation of all letters received from agencies. The National Park Service has received 226 separate electronic, written, or verbal comments on the *Draft General Management Plan Amendment/EIS*. The following is a summary of these public comments and the NPS response.

6.3 SUMMARY OF SUBSTANTIVE COMMENTS AND NPS RESPONSES

1. **Public Concern:** The Park's current GMP, was completed as part of a public process and calls for the removal of cabins at Elkmont upon termination of leases on December 31, 1992 and December 31, 2001 and for building sites to be returned to a natural state. This original plan should be carried out.

"The GMP was adopted after extensive public review and comment. Removal of all of the Elkmont structures was an explicit objective of the GMP. The Public response then was overwhelmingly in favor of removal of all of the structures. The National Park (NPS) is obligated to defend the integrity of its GMP. Having spent the time and resources in preparing the GMP, it should be expected to stand by its original decision." (Individual, Walhalla, S.C.; #36b)

"NPCA's position has not changed having examined the information provided in the DEIS. NPCA, on behalf of our 300,000 members, continues to support implementation of the 1982 General Management Plan (GMP) that calls for removal of all of the structures in Elkmont and allowing the area to return to its natural state." (Conservation Organization, Knoxville, TN; #37a)

"I support Alternative A to remove all structures from the Elkmont area. They hold no historic value and their presence does not conform with the objectives of the GMP. ...Please return Elkmont to it's natural state as was originally intended by the GMP." (Individual, Knoxville, TN; #41a)

Response: Public planning for the Park's GMP was begun in the late 1970s and completed in 1982, prior to Elkmont achieving historic status. In 1994, Elkmont was listed on the National Register of Historic Places as a historic district. The National Register is the nation's official list of properties recognized for their significance in American history, architecture, archeology, engineering, and culture. National Register properties can be significant to a local community, a state, an Indian tribe, or the nation as a whole. Because of this historic designation and as a result of consultation with the Tennessee Historic Preservation Officer and the Advisory Council on Historic Preservation during the 1990s, the Park initiated this current planning process. As part of this planning process that combines requirements spelled out in both the National Historic Preservation Act and the National Environmental Policy Act, a full range of alternatives for the future management of the Elkmont Historic District was developed with public and agency input including the plan described in the 1982 General Management Plan. The Park has identified Alternative C as the environmentally and agency preferred alternative for the future management of this district.

2. **Public Concern:** The Park should return the cabins to the original owners thereby saving the cabins at no cost to the Park.

6.0 PUBLIC AND AGENCY COMMENTS

“...didn’t I just read that a decision has been made to keep 18 or 20 cabins and the clubhouse...at a cost of more than 5 million dollars? It’s a shame they didn’t figure out that they could have left the people and area as it was at no cost! I seem to remember the people wanted to pay the park \$300,000 dollars and they were not interested...am I right? ...I’d like to see the area returned to the people and condition it was before someone decided to fix what wasn’t broken” (Individual, Knoxville, TN; #6a)

Response: Most Elkmont properties were acquired in 1932 as part of the Park establishment process. The original intent in acquiring all property in Tennessee and North Carolina within the designated Park boundaries was to create a public park for all citizens, without pockets of privately owned “in-holdings”. The original owners of these properties were granted lifetime leases on these same properties under a lease arrangement provided by Congress in the early 1930s. These leases were extended several times in the years following 1932, but all leases expired in 1992, 1996 and 2001. Returning these properties to the last lease holders or the original owners would not be consistent with the intent or purpose of the original acquisition. Additionally, there are no guarantees that properties would be better preserved under private ownership.

3. **Public Concern: The former leaseholders were given preferential treatment in the past and should not be given special preference in determining the future management of Elkmont.**

“Please do not give undue consideration to the former Elkmont leaseholders that overstayed their welcome in the Park. They agreed to a termination of their leases at the end of 1952 and then reneged on their Agreement. Using political connections the leases were extended 20 years, until 1972. In 1972 they reneged again, and using political connections, the leases were extended until 1992 except for 4 leases that were extended to December 31, 2001. In the 1972 Agreement the leaseholders agreed that they would not pursue any further extension of their leases. They later reneged on that agreement, but thankfully the leases were not renewed.” (Individual, Knoxville, TN; #4b)

“In 1934 when this area became a National Park people were forced to move out and their homes were torn down. The people in Elkmont had the advantage of staying in these cabins for an additional 70 years. Now is the time for them to join the families of 1934 and have their cabins torn down. Thank you for considering other peoples opinions.” (Individual, e-mail; #39a)

“Though it has its place in GSMNP’s history, the cabins and other structures are a testament to the wealthy, and preserving them only supports the belief that wealth has privileges. Too many ‘ordinary’ residents – people who worked the land and lived off of it – gave up their homes for the national park, and those are the people who need to be remembered. I see no reason to preserve the Elkmont structures that were collectively, merely a playground for the rich.” (Individual, e-mail; #84a)

“For too long a select few have held on to the special privilege of cabins in the National Park. A sense of fair play must prevail. With few exceptions, when the park was created, those who had homes in the included area were forced to leave. Only the Elkmont cabin owners were permitted to remain. In 1972 the Smoky Mountain Hiking Club was asked to voluntarily give up their “Cabin in the Brier” which had served as a camping spot not only for SMHC members but for scout troops and others. The reason given by the Park Superintendent at that time was that all in-holdings and special concessions were to be removed from the park. And all have been except the Elkmont Cabins. It is time the Park Service kept its word. It is time the Elkmont Cabin owners obeyed the terms of their contracts.” (Individual, Knoxville, TN; #104a)

Response: The Park recognizes the results of past preferential treatment in the leasing of Elkmont buildings. However, the Elkmont area is now listed as a historic district on the National Register of Historic Places. Because Elkmont is listed in the National Register the NPS must, in accordance with Section 106 of the National Historic Preservation Act, consider historic preservation values and the views of all appropriate federal, tribal, state, and local officials, as well as the general public, when determining the future management of this area. When the General Management Plan was issued in January 1982, the status of the Elkmont structures had been reviewed. The leaseholders participated in this process in equal standing with other members of the public who commented. The former leaseholders continue to have equal say in this public process and will not be given preferential consideration.

4. **Public Concern: Elkmont is listed on the National Register of Historic Places and therefore the Park has a responsibility to maintain and use these cultural resources.**

“Elkmont is listed on the National Register of Historic Places, an NPS program, and I feel that it is the responsibility of NPS to set an example regarding historic preservation, and there is nowhere better than to showcase this than in our nation’s parks – Elkmont is a prime example.” (Individual, Old Hickory, TN; #25b)

“Elkmont is a historic district. Every structure is of historic importance. I do not understand a process that takes years to see approval, to further neglect, destroy, misuse historic elements in an historic district. If a citizen did such a thing, it would be a crime. If he sought permission to do so, he would be thought insane. I charge the Department of the Interior, the Park, with complicating a simple issue: protect the historic.” (Individual, Public Hearing; #11c)

Response: Because Elkmont is listed as a historic district on the National Register of Historic Places, Section 106 of the National Historic Preservation Act requires the NPS to take into account historic preservation values when making decisions that would affect this historic property. The Section 106 review process encourages, but does not mandate, preservation of National Register listed or eligible historic properties. The purpose of Section 106 review is not to stop projects, but rather to ensure that federal agencies fully consider historic preservation values and the views of other agencies, tribes, organizations, and the public

6.0 PUBLIC AND AGENCY COMMENTS

during project planning and decision-making. Sometimes there is no feasible and prudent way for a needed project to proceed without adversely affecting historic properties, and there may be overriding natural resource concerns or economic and social benefits that make it necessary for such a project to proceed as planned. Section 106 review does, however, ensure that preservation values are factored into federal agency planning and decision-making, and that federal agencies assume responsibility for the consequences of their actions on historic properties and are publicly accountable for their decisions.

The Park has determined that Alternative C is the preferred alternative for all resources considered. The DEIS has disclosed that actions prescribed in the preferred alternative would create adverse effects to properties within the Historic District. Despite these proposed adverse effects, it has been determined through consultation with the National Register of Historic Places office, that this alternative would preserve a core portion of the historic district and that this reduced area would still be eligible for listing on the National Register as a smaller district.

5. **Public Concern: The cabins at Elkmont do not possess historic significance. Cabins were poorly constructed, have been modified over time and therefore do not merit preservation. Historic status has been inappropriately applied to this community.**

“As a frequent visitor to GSMNP and a professional historian, I strongly support Alternative A regarding the Elkmont Historic District. The cabins should be torn down and the area returned to nature. There is nothing “historic” about these buildings that warrants their preservation and restoration.” (Individual, e-mail; #68)

“The significant history associated with the Elkmont area is the history of the logging of the Little River watershed. The Little River Lumber Company discontinued its operations in about 1939. Leasing and using a summer home in a National Park is not significant history, nor does it make these structures historically significant. “Old” is not synonymous with “historic”.” (Individual, Public Hearing; #5c)

“As an Architect, I have a difference of opinion about the historic nature of this area of the park. I totally disagree that it’s historic, and I think that it was an in-run that the Elkmont families made to try and save their special privilege that they’d had for years and years. If any structures are to be restored, I would want that to be very limited. I would want them open to the public 24-7, open air, no locks. If you’ve got to lock it because it is unsafe, then tear it down. As to the Appalachian Clubhouse, I totally disagree that there is anything historic about that, except for perhaps the quaint sign that says “Private, Members Only.” (Individual, Public Hearing; #19c)

“Having seen most, if not all, of the former “resort homes” at Elkmont first hand many times, we see very little to preserve. A few of the homes were probably attractive in their day, but most were little more than shacks, even in their heyday, thrown up along two streams that

would be beautiful without the ugly, rundown buildings crying out to be torn down and removed forever.” (Married Couple, Dandridge, TN; #1b)

“Most of the cabins are not worthy of historic preservation; instead, they are a hodge-podge of often-cheap construction, and the years and lack of maintenance have not been kind to the cabins. Many are well beyond preservation, and few provide anything either significantly historic or architecturally significant other than a reminder of the special privileges that wealth and influence bring. Such wealth and influence allowed some people to have their own “piece of the Park” for way too long. At this point in time only a few people continue to be obsessed with keeping these reminders of the privileged few who flaunted the idea that our National Parks are for everyone.” (Individual, Knoxville, TN; #4b)

“While I appreciate the difficult position the NPS has been placed in by the political maneuvering of Elkmont preservationists and sympathize with the effort to strike a compromise, to propose propping up 18 of these structures is financially irresponsible, indicative of misplaced priorities and, quite simply, beneath the “historic” standards of the NPS. ...A shanty town of vacation cottages – is worthy of “historic” in the national preservation sense? I can understand how the area could be personally historic, just as my time spent camping in the Smokies’ backcountry and traipsing thousands of miles has been personally historic, but both are of absolutely no historical consequence to the rest of America. Maybe I should be demanding personal shrines and interpretive displays in the areas of the park I most regularly frequent for relaxation, recreation and personal restoration. If that’s all it takes – plus passage of time – to warrant “historic”, then consider this a formal request for what is my deserved designation and recognition.” (Individual, Knoxville, TN; #117a)

Response: The Elkmont Historic District’s listing on the National Register of Historic Places serves as the basis for recognition of the district’s historical significance. A third party consultant conducted the study and made the recommendation. Specific buildings within the district are identified as either contributing or non-contributing to its national register significance. As a consequence of the district’s listing, the National Park Service retains responsibilities (under Section 106 of the National Historic Preservation Act) for assessing all proposed undertakings affecting the district in efforts to avoid, reduce or mitigate adverse effects on historic properties. The State Historic Preservation Officer, the Advisory Council on Historic Preservation, affiliated tribal groups and other concerned parties are provided opportunities to comment on the proposed undertakings.

The Appalachian and Wonderland Clubs remain as small fragments of the area’s past history and the significance of these remaining buildings is primarily that of a summer vacation community for locals, generally from Knoxville, Tennessee. The construction methods and materials used are indicative of this ephemeral quality. The condition of Elkmont buildings is of primary concern to the Park and the identified preferred alternative offers the best option for preserving a manageable group of buildings that can be maintained while at the same time conveying the history of this district.

6.0 PUBLIC AND AGENCY COMMENTS

As part of the proposed mitigation for the present project, the NPS proposes to amend the national register nomination form for the district to reflect adjusted site boundaries and to reassess the remaining buildings as contributing or non-contributing to the significance of the revised district. The process of amending the nomination also provides an opportunity to identify and evaluate other aspects of the district such as the cultural landscape, correct any inaccuracies in the current nomination, and/or possibly consider other evaluation criteria and historic contexts.

6. Public Concern: The buildings at Elkmont do not meet the purpose for which Great Smoky Mountains National Park was established.

“We realize many former “resort home” owners have fond memories of their times at Elkmont, but this is no more reason to preserve it than the fond memories of other former owners of homes which were acquired by eminent domain and purchased by the government to establish the park in the first place.” (Married Couple, Dandridge, TN; #1b)

“When the National Park was established in the 1930’s, it is my understanding that one of their missions was to restore and maintain early PIONEER structures in preserving the history and culture of the FIRST SETTLERS into the area. Does the word “PIONEER” appear in the original draft documents or not? It is my belief that it does. Since when are 1920 circa buildings associated with hunting lodges and resorts part of the “EARLY PIONEER” heritage ORIGINALLY targeted for preservation by the folks who bought and paid for the place? ...It must have been one mighty important politician who pulled some strings to OVERTURN the ORIGINAL MISSION OF THE NATIONAL PARK SERVICE. ...The National Park should REMAIN a monument to EARLY PIONEER DAYS of the 1800’s, not the mere THIRTY YEARS marking the commercialization of the mountains between 1900 and 1930, just before it was established as a park.” (Individual, e-mail, TN; #9a)

“The issue of Elkmont being designated a Historic District was a “Johnny come lately” affair. This latest plan was engineered by those whose lives were attached by use of the summer vacation homes in Elkmont during its time period. It was not in the 1982 General Master Plan, nor in the thought conveyed in a report done by Stupka, Grossman and Wilber in the 1930s. That report, which was called for by the Director of the National Park Service, stated that cultural history representing the 19th century be reflective in the parks attempt to showcase the Southern Appalachian way of life. A copy of this report is in the Park Library.” (Individual, e-mail, TN; #15a)

“Removing the cabins is completely in concert with the original park establishment, when hundreds of families were evacuated to provide park territory. The only “history” relating to these structures has to do with the extended efforts by the few owners’ families to disregard the original agreement that would have long since terminated the original owners’ right of occupancy.” (Individual, Oak Ridge, TN; #46a)

“There’s obviously a lot of debate on whether there is any historic significance to the cabins at all. Regardless of where you stand on that issue, I think building a monument to the summer community at Elkmont could be seen as a slap in the face to the people whose families were moved out of the Park at the time of its creation, and potentially to the Indians who – who lived in the Park even before them.” (Individual, Public Hearing; #29c)

Response: The assertion that the preservation of the Elkmont Historic District does not meet the purpose and intent of Great Smoky Mountains National Park as defined in the 1924 report to Congress and 1926 enabling legislation is correct. However, because Elkmont is listed as a historic district in the National Register of Historic Places, Section 106 of the National Historic Preservation Act requires the NPS to take into account historic preservation values when making decisions that would affect this historic property. While there is a risk of presenting a false history, an incomplete history, or an imbalanced history of the Smoky Mountains through the preservation of the Elkmont vacation community, the Park will tell as much of the entire history of this valley as practicable through education, exhibits and ranger led programs. Many of the cultural resources of the Native Americans and original European American settlers are now gone and cannot be recreated, but these resources exist and merit a certain degree of preservation.

7. Public Concern: Removing the cabins at Elkmont will forever destroy this part of history in Great Smoky Mountains National Park.

“Please preserve and restore Elkmont in its entirety. No more of it should be left to decay and collapse. It is a wonderful, historic place like no other. History cannot be recreated and must be preserved. Please do all you can to save this jewel.” (Individual, e-mail; #6a)

“In this current age we seem to forget our history and its lessons and wipe out what does not agree with the current plan. I urge you to put aside that thought process and keep the areas that were the site of so much happiness and learning for so many people (beside the actual “owners of the leases) and continue that experience with the public in general. These places can continue to be a positive force for the Park system and the Park visitors.” (Individual, Nashville, TN; #64a)

“...whether anyone likes it or not, those structures at Elkmont are part of the history of the area. This should not be eliminated, but should be nurtured for future generations, as a great part of the area’s story. To me, destroying these structures would be like tearing down the great houses at Chaco Canyon for the reason that nature should be allowed to take its course with no sign of man. What would that great park be without those manmade structures? Or Bandelier? Or Navajo National Monument? This is just naming a few examples. Also, note how much remaining structures are visited and enjoyed in the Park now. Should Elkmont be enjoyed any less? I think not.” (Individual, Hayesville, NC; #71a)

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“Razing all but a handful of cabins would be a travesty. The historical value of the Elkmont community would be greatly diminished and the opportunity to provide visitors with a truly unique experience would be lost forever.” (Individual, Knoxville, TN; #109a)

Response: The Park recognizes that total demolition would be a major and permanent impact and therefore agrees that there should be a certain level of preservation and historic narrative of these resources. This is partially why Alternative C was identified as the preferred alternative, because it restores a core portion of the Historic District and would preserve this area into the future for public enjoyment and understanding of these resources.

8. Public Concern: The history of logging in this valley should be incorporated into the future management of Elkmont, including special consideration to the “set-off” cabins located within the District.

“The more important history of Elkmont, that of its development as an adjunct of railroad logging is not adequately addressed. Three to five “set-off” houses are incorporated in at least two of the structures that are prescribed for retention under alternative C. “Set-off” houses are an important and integral part of the historic story of railroad logging. A good argument can be made that they were the first “mobile” homes. Strangely, the DEIS does not address the critical necessity of saving these “set-offs”. To do that, they must be freed from the exteriors applied to them, freed from the roofs placed over them, freed from the porches attached to them. They should be extricated and restored to their original condition. If history is to be our guide, these “set-offs” are a key part of it, and of railroad logging. They are so rare, and finding examples in good condition so unusual, that restoration of them to their original condition should be the highest priority.” (Individual, Walhalla, SC; #36b)

“Only an absolute minimum (1 to 4) of the structures should be left for the historical interpretation of the logging history of the area. Interpretation of the logging industry lifestyle in the GRSM is significant.” (Individual, Oak Ridge, TN; #18a)

Response: Many of the “Set Off” cabins have been changed over time from their original configuration as quarters for loggers and their families in the early part of the 1900s. The preservation prescription for these cabins would likely acknowledge and respect these historic changes as the changes themselves are also historic. The historic interpretation of these individual buildings would discuss the origins of these buildings, their original use in the local lumber industry and their subsequent purchase and use by private citizens as vacation homes in the Appalachian Club. The Park recognizes the significant history of these buildings and the changes throughout time. The Park would most likely not restore the buildings to their original configuration as quarters for loggers due to the fact that they have been moved from their original location(s) and have achieved additional historical significance in their current location. Education and interpretation would help visitors “see” and understand the core structure, the original use and subsequent alterations during the period of use as vacation homes.

9. Public Concern: No Alternative in the range of Alternatives adequately addresses preservation of the cultural resources at Elkmont.

“Unfortunately, this DEIS is seriously flawed, somewhat skewed, and inadequate for the purposes of making a responsible decision for the future of this area and the complex issues it presents, especially in the preservation of historic and cultural resources. The problem is that the cultural resources are hostage to a dispute between two opposing visions of the area. One advocates the removal of all structures from the site and restoration of the area to a natural state. The other advocates restoration of human occupancy either in leases or a creation of a full-service resort, although neither of these visions would preserve the cultural resources, and indeed the development option would destroy both the cultural resources and the natural resources. This dispute culminated in the designation of the National Historic District. However, the result is that the DEIS seems to respond to the National Historic District designation rather than the full range of cultural resources that exist in this area.” (Individual, Public Hearing; #4c)

Response: These alternatives were developed as part of a public process that requested the public to provide comments and input on these alternatives. Additional alternatives were developed as a direct result of public participation, specific comments and suggestions. Alternative D was evaluated where historic and cultural resources are preserved, largely without human occupancy by lease or resort. This alternative transcends the two visions mentioned, (one advocating restoration for human occupancy and the second restoration of the site to a natural condition), but this option was not identified as the final preferred alternative as a result of a cost benefit analysis. The Park recognizes the concern related to the preservation of historic and cultural resources and recognizes the long-standing debate between advocates who wish to see the area turned into a resort and advocates who wish the area to be returned to a natural condition. No specific suggestions have been provided for the Park to address.

10. Public Concern: Many of the names used in the DEIS are either incorrect or do not accurately capture the historic names dating back to the Period of Significance.

“The buildings are not treated as historic objects. The buildings are referred to by the names of the last owner, even if owned for a very short time. They are not referred to by their historic names such as “Happy-Latch-On”, “Walnut Lodge”, “O-So-Cosy”, “Spindle Top” or “Balsam Lodge”. No effort was made to obtain the chain of ownership and names of previous owners. ...The areas at Elkmont are given non-historic names which appealed to Contractors for the Study: No attempt made to determine the historic names of areas and their origin. (ie “Stringtown” was a slang term during the period of logging which was applied to housing on the Little River Road. The most common terms from the 1930’s to the late 1980’s was “lower Road” or “Little River Road” and “Jakes Creek Road”.) Renaming areas –(ie. Calling one area “Millionaires Row” from a joke at a party) –is very unprofessional; justifying it by “asking around” is worse. When advised that the terms chosen were very prejudicial and likely to inflame irrational local passions regarding class distinctions –(ie. “Society Hill”, “Millionaires Row”) –the Contractors ignored the advice and so frequently used the terms that they have

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become built into this study and into the minds of all seeking just solutions to the many problems.” (Individual, San Francisco, CA; #33b)

Response: The Park recognizes the inconsistencies in names used in the original National Register nomination. The Park also recognizes the names used to delineate the different zones within the District for planning purposes may not be entirely correct or consistent with historic names used. For the purposes of this planning process and EIS, the names will remain the same as of present to maintain consistency, but will be corrected to reflect the accurate names from the Period of Significance as part of future implementation of this plan.

11. **Public Concern: Preservation of cabins at Elkmont would impact the Globally Imperiled Montane Alluvial Forest.**

“The continued existence of these cabins would pose a dangerous obstacle for the sustainability of the mountain alluvial flood plain. This ecosystem is considered critically imperiled. Alternative A would provide for the lasting survival of this globally endangered environment.” (Student Organization, Cookeville, TN; #2b)

“Another miscellaneous point in favor of Alternative C includes the removal of buildings in the Millionaire’s Row area. Based on its landscape position, proximity to the major river, and residual vegetation, the floodplain area that comprises Millionaire’s Row was likely the best example of montane alluvial forest within the study area prior to settlement, and offers the best likelihood of success for future restoration efforts” (Individual, Saginaw, MI; #34a) [note: some of this is a direct quote from the DEIS, reprinted in the comment]

Response: The identified preferred alternative would protect and restore this forest community within the acceptable limits of natural variation along the Little River, within the study area of this plan.

12. **Public Concern: There is no Montane Alluvial Forest (MAF) in the Historic District and this forest type is only theoretical.**

“The buildings of Elkmont are real. The healthy forest surrounding Elkmont is real. The threat to these buildings is REAL. The threat to the “theoretical, potential rare MAF” forest is a concept composed of conjecture and assumptions. The MAF threat is not real. The crumbling buildings of Elkmont are much more threatened than the healthy forest” (Preservation Organization, Knoxville, TN; #13a)

“Neither preserving nor destroying buildings in the Elkmont area has much impact on the amount of MAF in the area since most of the structures are not on the kind of terrain described. And, all or nearly all of the plants represented in the MAF community thrive in

other areas of the Park. In fact, the difference in the amount of restored MAF between Alternative C and alternative F is virtually nil.” (Individual, e-mail; #73a)

Response: The document describes the Montane Alluvial Forest and the extent of this resource in Section 3.2.2.2, Terrestrial Communities. The Park recognizes that the parameters of an ecological plant community are not especially evident compared with the collection of historic cabins and hopes the following additional description will further clarify issues relating to the existence of this forest type.

Because much of the study area has been mapped as the “Human Influence” community type due to the ongoing influences of human occupation over the course of the past 100+ years, further analysis was necessary to delineate potential habitat for the identified community type known as the Appalachian Montane Alluvial Forest. Identification of extant species within the “HI” zones within the mapped 100-year jurisdictional floodplain in combination with the larger topographical/geomorphologic floodplain (based on fluvial character, slope and soil type) indicates that a considerable portion of the study area (approximately 34-57 acres) supports this community type. Within the specific study area, a total of approximately 15 to 21 acres of potential habitat exists along the Little River within the area known as Millionaire’s Row. This area alone represents 37-44% of the total potential Montane Alluvial Forest habitat within the historic district that would be impacted if certain project alternatives were implemented.

Other locations in the Park have in fact been identified where this community type exists, however, the relative importance of this specific community relates to the fact that it occurs within the floodplain of the Little River and not along one of the many steep ravines where most of this community type grows. Please refer to the cited pages in the document listed above for a more complete description.

The montane alluvial forest community type represents a climax forest community. Because of perpetual disturbance in the Elkmont environment for at least the past 100 years, including intensive lumbering operations, this plant community has been heavily impacted. If allowed to recover, this forest type will reestablish itself in this environment. Because plant communities are dynamic in nature, it is important to consider the morphological character of the environment in addition to the existing community type. If given the opportunity to succeed, many of the community types found within the Elkmont floodplain will transition into a more pure Montane Alluvial Forest community over time.

Because the NPS mission is to not only protect, but restore sensitive resources when possible, it is important that this community type be reestablished.

13. **Public Concern:** The DEIS should consider impacts to the Montane Alluvial Forest in general and specifically created by the existence of the Elkmont campground.

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“As for the environment impact statement, the cabin section has very little acreage, comparable in size and forest type to the campground and being adjacent to the campground gets nowhere near the remaining montane alluvial forest up near the cucumber gap trail.” (Individual, Burlington, NC; #75a)

“We believe that the EIS, the draft EIS, is defective in not taking into adequate account the prior damage done by the campground in the alluvial plain. This is a rare type of community in the Park. It’s increasingly rare across other parts of the Southern Appalachians, because there are very few undisturbed alluvial plains, and so it was too bad that the town of Elkmont was there and then it was replaced by a campground. This should have been restored to its natural condition.” (Conservation Organization, Public Hearing; #23c)

“The DEIS also fails to adequately consider the cumulative past, present, and likely future impacts on alluvial plains in the bioregion. This is a habitat type that has suffered devastation impacts throughout the region, of which the Elkmont Campground is not the least of causes!” (Conservation Organization, Knoxville, TN; #113a)

Response: This plan focuses on reevaluating the management strategy for the Elkmont Historic District, as articulated in the 1982 General Management Plan. Consequently, the existence and operation of the Elkmont Campground is not part of the project proposal and therefore is not being directly evaluated in this plan as part of the alternatives. However, the impacts to this forest type from development and operation of the campground should be considered in the cumulative impact analysis. Consequently, the description of the cumulative impact scenario (formerly “Other Planning Actions”) has been revised to include a brief discussion of the Elkmont Campground as part of the cumulative impact analysis in the Environmental Consequences chapter. This section was revisited to include evaluation of impacts from actions associated with the operation of the campground.

14. **Public Concern: The Park cannot propose any new use within Elkmont that would increase wastewater discharge into the Little River because it has been designated an Outstanding National Resource Water with no new discharge allowed.**

“The water quality of the Little River must be maintained for swimming, paddling, hiking, fishing and wildlife. The Little River is an Outstanding National Resource Water (Tier 3). There should be no daily discharge of effluent from the sewage treatment plant that exceeds the current maximum total daily discharge on the day of the highest discharge and the total annual discharge should not exceed the current total annual discharge.” (Individual, Oak Ridge, TN; #18a)

“One of NPCA’s primary concerns is how any change in management of Elkmont will impact the quality of the Little River. NPS has previously reported that in its current condition at current use levels the sewage treatment plant discharges approximately 10,000 gpd during peak season, operating at around 90% capacity. The NPS holds an NPDES permit (No.

TN0022349) for the Little River allowing up to 35,000 gpd. Addition of a holding tank may enable the plant to treat and discharge at the plant's maximum capacity and permitted volume of 35,000 gpd. The DEIS fails to adequately address the impacts that restoration and possible reuse of Elkmont structures will have on the Outstanding National Resource Water (ONRW) designation of the Little River. Under Tennessee State Regulation (1200-4-3-.06(3)) in rivers designated as ONRWs "no new discharge, expansions of existing discharges, or mixing zones will be permitted unless such activity will not result in permanent degradation of the water quality." The DEIS concludes that Alternatives B through F will require an increase in wastewater generated and therefore an expansion of existing discharges. The agency preferred alternative, Alternative C, would cause an increase of at least 1,625 gallons per day of wastewater. The DEIS does not analyze the question – Does the park have the authority, notwithstanding the NPDES, to add a holding tank to reach that capacity thus creating an "expansion of existing discharges?" As NPCA sees it, any increase in the amount of discharge, even if the quality of that discharge stays at current levels, will represent an increase in the amount of pollutants entering the Little River in Violation of its ONRW status." (Conservation Organization, Knoxville, TN; #37a)

"The DEIS analysis of the capacity of the sewage treatment plant does not adequately deal with the Tennessee water quality criteria. The Little River, into which the effluent of the existing water treatment plant is discharged, is a designated Outstanding National Resource Water (ONRW). Tennessee regulations prohibit any increase in discharges that would degrade the existing water quality of an ONRW." (Individual, Knoxville, TN; #90a)

Response: The proposed action under Alternative C, the Preferred Alternative, would not increase discharge above the permitted allowance of 35,000 gallons per day. Tennessee Department of Environment and Conservation (TDEC), has not provided guidance on how the Antidegradation Statement would be applied in the event of additional wastewater discharge into the Little River at Elkmont. In addition to the portion of the Antidegradation Statement quoted above in the NPCA comment, the Antidegradation Statement further states that "Existing water quality will be the criteria for these waters." implying that additional water quality degradation beyond that which existed at the time of ONRW designation will not be permitted.

Given the unclear position of TDEC and the somewhat vague language in the Antidegradation Statement, the appropriate approach to the wastewater treatment plant for the alternatives in the Elkmont Historic District appears to be that the wastewater treatment plant hydraulic capacity would not be increased in the future. It has previously been implied by TDEC that antidegradation of water quality may be based on not allowing any additional mass loading of the regularly monitored pollutants to the receiving stream at the point of discharge. This would allow additional hydraulic discharge without additional pollutant loading by applying mass based discharge limits and/or lower concentration based discharge limits. The current approach of TDEC seems to include a more holistic watershed assessment of the total pollutants in the discharge, whether or not they are regularly monitored, and their impact on the water quality of the receiving stream.

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The addition of a holding tank (6,000 gallon flow equalization basin) prior to wastewater entering the treatment facility was not proposed as a means of increasing or reaching the currently designed capacity of the wastewater treatment facility, but rather to equalize the erratic and variable flows entering the system. This additional feature has been proposed in order to protect the Little River from any unexpected wastewater flow that cannot be reasonably anticipated by providing a more regulated and controlled wastewater flow into the system. The addition of this feature and several other improvements to the wastewater treatment facility improve the ability to better treat wastewater thereby improving water quality of treated effluent which is in compliance with the Little River's ONRW status.

15. The DEIS does not address the fact that the Little River is a state designated "Naturally Reproducing Trout Stream".

"In addition to being one of only 6 streams in Tennessee that are listed as ONRWs., it is also designated by the Tennessee Department of Environment and Conservation (TDEC) as a Naturally Reproducing Trout Stream, which the DEIS fails to mention. This large, pristine body of water is a significant national resource and requires effective protection from the adverse impacts that would result from the proposed development of Elkmont." (Individual, New Market, TN; #116a)

Response: The fact that the Little River is also a "Naturally Reproducing Trout Stream" and was not identified as such in the DEIS was a simple matter of oversight. However, the Outstanding National Resource Water (ONRW) designation affords protection equal to *and* greater than a "Naturally Reproducing Trout Stream" (NRTS) designation in two ways. First, the ORNW protection affords all the regulatory restrictions associated with the NRTS designation. Furthermore, ONRW designation affords greater antidegradation protection than the NRTS designation.

16. Public Concern: The Park should pump additional wastewater generated by overnight use of Elkmont cabins over the mountain in a pipeline to Gatlinburg.

"The impact issues can be solved. The major issue is sewerage. I love the Little River, and would never want to see it less clean than it is now, but I believe technological solutions can be worked out, or the sewerage, could be piped to Gatlinburg, partially along the power line right of way and partially along the existing road." (Individual, e-mail; #73a)

"I personally think piping the sewer to Gatlinburg is the most long term solution to maintaining the purest possible river quality regardless of alternative choice. The old, original roadbed could be used for the pipeline, so no new soil would be disturbed. The cost should not be much more than any other plan to update the system in any meaningful way. I have been given a rough ballpark guess of ~\$250,000 a mile and estimate it to be ~4-5 miles to Sugarlands over the old road. At the last Consulting parties meeting two years ago in 2004, I asked these same questions about high tech, low water usage solutions or piping to

Gatlinburg. I was told at the time that ALL these issues would be answered in the DEIS. These points have been carefully avoided and NOT discussed or evaluated in this DEIS, yet to me, they seem like the BIGGEST issues we face.” (Preservation Organization, Knoxville, TN; #13a)

Response: Under the Preferred Alternative, wastewater generated would not exceed permitted levels and could therefore be processed on site within the existing waste water treatment plant. Alternatives E2, F1 & F2 are the only alternatives that would necessitate consideration of this treatment option. This pipeline would only be needed to service the Wonderland Hotel (if it was reconstructed), the Hotel Annex, and up to 20 cabins. A pipeline of this length would result in a large financial cost for this relatively small number of rooms and cabins. It also could create a substantial environmental impact over its 6- to 8-mile length, including extensive soil disturbance, removal of trees and other vegetation, and fragmentation of wildlife habitat. In some places, the road shoulder could be used for burying the pipeline to minimize environmental damage by using previously disturbed ground, but this approach would result in traffic disturbances, including partial road closures along the Little River Road and the road into Elkmont. This would substantially disrupt visitor access to this part of the Park during construction. In areas not adjacent to roads, there would be a relatively high probability for impacting cultural resources, including archeological and historic sites.

When considering the financial and environmental cost of such a system, compared to the relatively few rooms and cabins that this system would serve, it would not be a prudent undertaking. As a result, this option has been dismissed from further consideration.

17. Public Concern: An incomplete analysis was conducted on the option for constructing a pipeline over the mountain for wastewater treatment.

“Alternatives E and F will require additional wastewater treatment at an alternate location, either by drip irrigation or by piping the wastewater to a treatment facility in Gatlinburg. Such an evaluation of the additional treatment method was not done in the DEIS. Consequently, an adequate evaluation of the impacts associated with treatment of the increased volume of wastewater can not be made. This assessment should be included in the Final Environmental Impact Statement and not deferred until project implementation, as stated in the DEIS.” (Attachment, Individual, Knoxville, TN; #39b)

“The more intensive alternatives also suffer from too many unknowns requiring further evaluation. These include the cost and route of a new sewer to Gatlinburg...” (Individual, Saginaw, MI; #34a)

Response: The Preferred Alternative would only require minor improvements to the existing wastewater treatment plant and would not require a pipeline over the mountain to transfer waste. The option for considering a pipeline over the mountain for Alternatives E2, F1 and F2 has been dismissed and is described in the previous response.

A low-pressure, pump-and-piping system to distribute the wastewater into the soil through perforated, small-diameter, drip irrigation piping was considered. Such a drip irrigation /

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disposal system could be used to treat and dispose of the additional wastewater generated by alternatives that would exceed the design capacity of the existing wastewater treatment plant. However, the use of a low-pressure, drip irrigation system would not be desirable because of the generally poor suitability of the soils throughout the District, making it a challenge to locate a reliable, long-term location for such a system. As a result, if a drip irrigation / disposal system was installed to accommodate the wastewater treatment needs of an alternative, a suitable site for this system would have to be identified outside the District and is pending a determination as part of a separate, ongoing investigation. For the purposes of this Environmental Impact Statement, this option was dismissed from further consideration.

Upon post assessment of the alternatives using this treatment option, that is piping wastewater over the mountain or using a drip irrigation system, it was determined that neither of these other options would affect the outcome of the identification of Alternative C as the preferred alternative.

18. Public Concern: Buildings located within the floodplain should not be restored.

“I would however, like to suggest, that when Alternative E1 is implemented, that the buildings in the flood plain should be removed and natural restoration implemented in their place. Seriously, if these buildings are in danger of being severely and perhaps repeatedly damaged after extensive restoration, then they should be removed and taxpayer’s money better utilized elsewhere.” (Individual, Fayetteville, NC; #8a)

“The more intensive alternatives also suffer from too many unknowns requiring further evaluation. These include ...the retention of buildings within the 100 – year floodplain in Millionaire’s Row (including three that lie within the 100 – year floodplain, which is contrary to NPS policy and might not even be permitted)” (Individual, Saginaw, MI; #34a)

Response: The National Park Service discourages actions in the 100-year floodplain (base floodplain) such as the retention and use of cabins for overnight use. However, the preferred alternative (Alternative C) would not retain any buildings within the 100-year floodplain. The NPS procedure for complying with Executive Order 11988, as presented in Procedural Manual DO 77-2, Floodplain Management Guidelines, requires a detailed analysis of flooding hazards and potential mitigation measures in a Statement of Findings, if the preferred alternative would have such effects. Consequently, this analysis and preparation of a Statement of Findings is not required for this project, given the removal of all structures from the floodplain under the preferred alternative. However, consistent with NEPA requirements, the potential impacts of allowing structures to remain in the 100-year floodplain under Alternatives E and F are disclosed in the environmental consequences chapter of the FEIS.

19. Public Concern: Most Western National Parks provide the public with a rustic, quiet hotel experience and Great Smoky Mountains National Park should provide this same opportunity with the Wonderland Hotel and Elkmont cabins.

“I am a big proponent of the Great Smokies eventually getting a grand lodge – whether at the Wonderland Hotel site or some other location. If Glacier, Yellowstone, Grand Canyon, Yosemite, etc., have lodges, why can’t there be at least one lodge in the most visited national park in the system? Staying in Gatlinburg, Pigeon Forge, Cherokee, Bryson City, Maggie Valley is most certainly not the same as being surrounded by the beauty of the park.” (Individual, Burns, TN; #4a)

“I strongly believe that all structures in Elkmont should be restored and the entire district should be converted into a resort. If the cabins were restored the Smokey Mountain National Park would be able to accommodate tourists much the same as Yellowstone, Grand Canyon, Mammoth Cave and many other national parks with their famous lodges.” (Individual, e-mail; #28a)

“I often stayed in the Wonderland while our cabin was being worked on. The simplicity of a mountain hotel, like those in so many of our National Parks, is just what many of our fellow citizens long for. It is very, very wrong of the National Park System to not allow this experience to the American people. ...Do I have to travel out west to have the privilege of staying in a mountain hotel? Are the thousands of acres of the GSMNP to be completely off limits to me? I know there is much pressure to keep all development out of the Park. This is not development. This is simply restoring what is historically there, only making it available to the general public. We lived in Elkmont for eighty-five years, and we did not harm the environment. ...I beg you, Sir, to consider rebuilding Elkmont and Wonderland for the use and benefit of the American People.” (Individual, e-mail; #70a)

“I have been in Yellowstone and other national parks in which there are lodges with historical elements. I have never been able to stay there because they have always been booked for so long, but I enjoyed visiting and feeling a sense of what things were like in that area long ago. I did stay at the Wonderland with my grandmother once, and took my husband back there when my daughter was small. I cannot imagine any viable reason why not to restore the Wonderland, it seems like such a win win situation. ...There is nothing like it in our park. Please keep all that you can and reconstruct the Wonderland. I will definitely stay there again if I have the option.” (Individual, Knoxville, TN; #114a)

“...you know, they have concessionaires in other parks, Yosemite especially and Yellowstone, and there’s one other out West – and the Grand Tetons, they have people who are living there, they can rent cabins. There’s no reason why that can’t be done here.” (Individual, Public Hearing; #37c)

Response: The Park considered this provision under both action alternatives E and F within the Environmental Impact Analysis, but neither of these alternatives was selected as the preferred alternative.

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Although there would likely be some value to a rustic, quiet hotel experience at Elkmont, the NPS determined that the overnight lodging described in Alternatives E & F does not meet a number of legal and policy requirements for concession facilities. Title IV of the National Parks Omnibus Management Act of 1998 (Public Law 105-391) states that the development of public accommodations, facilities, and services in units of the National Park System shall be limited to those accommodations, facilities, and services that are necessary and appropriate for public use and enjoyment of the unit of the National Park System in which they are located, and are consistent to the highest practical degree with the preservation and conservation of the resources and values of the unit. In determining whether concession services are necessary and appropriate, the NPS reviews the particular circumstances of a park in relation to law, policy, various planning documents, and other pertinent information.

The General Management Plan for this Park includes a very clear statement that concession services will be limited to fulfilling visitor needs that cannot be met or would be inefficiently met by other sources. National Park Service Management Policies include the following statement: “Overnight facilities and food services will be restricted to the kinds and levels necessary and appropriate to achieve each park’s purposes. In many cases, overnight accommodations and food services are not needed within a park. In general, they should be provided only when the private sector or other public agencies cannot adequately provide them in the park vicinity.” With numerous food and lodging facilities located just outside the Park boundary in Gatlinburg, the NPS does not believe that overnight lodging facilities are necessary at Elkmont for public use and enjoyment of Great Smoky Mountains National Park. In addition to not being necessary, overnight lodging at Elkmont as described in Alternatives E & F does not meet other criteria established in law and policy with regard to concession facilities. Additional discussion of this issue can be found in sections 1.5.5, 4.7.8 and 4.8.8 of this report.

20. Public Concern: Overnight lodging and/or day use rental in the Elkmont cabins and hotel could provide the Park with a source of income and better serve to protect the buildings.

“In 1993, my firm was hired by the NPS to evaluate the historic and architectural significance of Elkmont. As a result of my study Elkmont was listed on the National Register of Historic Places in 1994. Since then I have followed the fate of Elkmont closely and wish to add my voice for the preservation of as many of the community’s resources as possible. Over the past decade I have had numerous conversations with developers and preservationists about the buildings at Elkmont. Most of those I have talked with feel that Elkmont could be a model of public and private partnership for interpretation and overnight lodging.” (Private Business, Nashville, TN; #23b)

“The National Trust strongly supports the preservation of this core cluster of buildings, and we commend the Park Service for its interest in protecting Daisy Town. However, we urge that modifications in the proposed use of these cabins be considered. In our experience, the long term viability of any standing structure is improved if the property is used in an active way, rather than being restricted to static display. The National Trust recommends that a

number of Daisy Town's cabins be retrofitted for day-use rental. As Daisy Town is less environmentally sensitive than some of the other areas within Elkmont, a higher level of use and visitation should be considered for this area. Making certain cabins available for day-use rental could compliment the proposed function of the Appalachian Clubhouse, and would enhance both the revenue and the potential for fundraising to support rehabilitation and maintenance of the historic properties. We believe this modification to the plan would offer a more balanced approach to preservation. ...The National Trust requests that the National Park Service review its commitment to Alternative C and broaden this alternative by incorporating three additional cabins located in Millionaire's Row for day-use rental. ...The inclusion of these three additional properties within Millionaire's Row would more fully represent Elkmont's geographic diversity, broadening visitor experience and creating compact, yet adjoining, areas for greater cost efficiency in park maintenance, programming staff, and policing as well as greater long-term financial viability." (Preservation Organization, Washington, D.C.; #62b)

"I believe it is in the best interest of the general public to save as many Elkmont structures as possible and make them available for overnight use. While this is certainly the most expensive option, I believe there are concessionaires who would be willing to spend money to rehab the cabins and rehab or reconstruct the Wonderland Hotel in return for a long-term contract that offers a reasonable return on the investment. This option preserves in its entirety a historic community and gives the public another alternative to a motel room in Gatlinburg or a camping site in a campground." (Individual, Knoxville, TN; #109a)

Response: Consideration of revenue to the United States is subordinate to the objectives of protecting and preserving park areas and of providing necessary and appropriate visitor services for visitors at reasonable rates.

The Historic Properties Management Analysis completed by Lodging Resources, Inc. did estimate the costs, revenue, and franchise fee payments for several alternatives that included overnight lodging. The capital improvement costs of developing concession facilities far exceeded the benefits of any franchise fees that would be received by the NPS. In addition, concession facilities at Elkmont would result in a substantial increase in NPS operational, administrative, and maintenance costs that might exceed the amount of franchise fees received.

Infrastructure improvements to this site would be considerable when upgrading buildings for active or overnight use compared to the preservation requirements for buildings when used as static displays. The associated environmental impacts, impacts to both the natural environment and historic resources, and fiscal constraints related to these initial capital improvements further emphasizes the substantial challenges associated with commercial use of these buildings.

21. **Public Concern: Developing commercial services at Elkmont is not necessary and appropriate and should remain outside Park boundaries.**

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“Introduction of a concessions operation under Alternatives E & F is totally unnecessary. The adjacent camp ground and private hotels/motels in nearby Gatlinburg and Townsend can accommodate the need for overnight accommodation for visitors.” (Individual, Birmingham, AL; #10b)

“...some of the alternatives contemplate public lodging and dining in the Elkmont District are out of character for the Park, being a more intense development than any other area of the park. Such lodging and dining could be provided suitably by private enterprise in the margins of the Park on private property, as is currently being done.” (Individual, Saginaw, MI; #34a)

“The DEIS fails to address federal law and policy regarding commercial operations within units of the national park system. ...In the opinion of NPCA, NPS lacks the authority to commercialize any Elkmont structures. Congress and NPS very wisely placed restrictions on where business can set up shop in national parks, recognizing that such enterprises cause significant impacts. Under the *Concessions Management Act* (16 USC 5951) concessions should be “provided only under carefully controlled safeguards.” Under the law and NPS Management Policies (Section 10.2.2) a business must be “necessary and appropriate for the public use and enjoyment of the park in which it is located” and “identified needs are not, nor can they be, met outside park boundaries.” One need simply to consult a phone book to determine that there are a variety of rustic meeting spaces around the park. The DEIS must explain how commercialization of Elkmont is necessary and appropriate and how the needs cannot be met outside the boundary of the park.” (Conservation Organization, Knoxville, TN; #37a)

“I oppose any commercialization of that area. I don’t think we should be preserving any of it to rent out. There are enough commercial establishments surrounding the park for people to use for those purposes, and I don’t think we should have any commercialization in there.” (Individual, Public Hearing; #24c)

Response: The National Park Service determined that a concessions operation at Elkmont was in fact not necessary and appropriate per NPS Management Policies, based largely on the close proximity of similar services in the outlying communities and this determination was one of the main criteria why neither Alternatives E nor F was identified as the preferred alternative.

22. Public Concern: The Necessary and Appropriate analysis determined that a concession operation was not necessary, and renting the Appalachian Clubhouse would violate this determination.

“In most of the Alternatives, NPS proposes the leasing of the Appalachian Club clubhouse as a facility for meetings, parties, indoor picnics, reunions and similar day use. Commercial use of any structure in the park must be both necessary and appropriate. See U.S. Code sec. 5951.

Current NPS regulations are even more specific. They also incorporate the statutory standard of necessary and appropriate. But they go on to require that commercial use of a park facility must be “necessary and appropriate for the public use and enjoyment of the park in which it is located, and identified needs are not, nor can they be, met outside park boundaries.” [Emphasis added] Clearly, public meeting and picnic facilities are abundantly available outside the Great Smoky Mountains National Park.” (Individual, Walhalla, SC; #36b)

“Our club is **very concerned** about any movement toward commercialization, such as rehabilitating the Appalachian Club House for concessionaires to operate as a day use facility, and would reject Alternative C as currently structured.” (Conservation Organization, Knoxville, TN; #38a)

Response: The Clubhouse would not be run by a concessioner, but rather be administered by the Park under the Special Uses authority as a public day use facility (picnic pavilion). This use and action is in keeping with the Park General Management Plan that directs a picnic pavilion to be constructed at Elkmont. The reuse of the Appalachian Clubhouse as a day use facility would fulfill both historic preservation and the call for such a facility to be constructed at Elkmont.

23. **Public Concern: It is not easy for the elderly, disabled and children to camp out in the Park and the buildings at Elkmont could be developed to better accommodate these visitors during overnight stays in the Park.**

“On several occasions we have walked through the Elkmont area and wondered about its future while wishing it could become guest lodging (we are past the point of life where we camp).” (Married Couple, Petaluma, CA; #24b)

“My blind 92 year old mother-in-law and my wheelchair bound 80 year old mother love this Park as much as anyone. They have both spent countless nights inside “their” park at both the Wonderland and the cabins. They raised their children to love and care for their Park. Now, neither is able to enjoy the Park because of advancing age. An afternoon on the porch of the Wonderland would be heaven for these two fine women and countless others like them.” (Preservation Organization, Knoxville, TN; #13a)

“I am way too old to camp out, and I don’t own an RV. How am I supposed to enjoy the Great Smoky Mountains National Park? Drive through? Picnic? Walk a little, maybe?” (Individual, e-mail; #70a)

“I support Alternative F2. That will allow a diverse situation – you know, diversely situated people, the handicapped, the young, people with families, with younger children, the elderly, to enjoy the park and be able to reside in the park in facilities that could accommodate them, whereas the camping situation would not.” (Individual, Public Hearing; #33c)

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Response: Alternative C was identified as the preferred alternative for the Elkmont Historic District because it would provide the best balance of preserving natural and cultural resources. If the NPS were to determine that accessible overnight lodging in the Park is necessary, Elkmont is not the location that would best meet these needs. For several reasons, including environmental impacts to Elkmont resources, the provision of new facilities in another location would be a much more practical way to satisfy this need. The degree of modifications and retrofitting required to rehabilitate this site and these buildings for safe and accessible occupancy would entail substantial alteration when an alternate location could better accommodate such a need with a lesser degree of overall environmental impacts.

- 24. Public Concern: There are intangible aspects of this former resort community such as family connections that cannot be recreated and aspects that cannot be experienced through historical photographs, exhibits or any other type of media. These prior family connections should guarantee better preservation of the Historic District.**

“Hearing the plan to dismantle and destroy the Wonderland Hotel in Elkmont is extremely disturbing and sad to me, a native of Knoxville, Tennessee, and a long ago visitor to the Hotel and cabins. This area played a crucial part in my childhood and youth and is deeply treasured by so many. ...We MUST preserve the Elkmont Historical District as a place for families to gather, a place for recreation, renewal, and sharing of old family memories.” (Individual, New Port Richey, FL; #7b)

“I urge you to please preserve as much of this historic area as you possibly can, since it has such a rich history and means so much to so many people. My father, T.H. (Huddy) Alexander, Jr., grew up in the summers up on Jakes Creek, near Elkmont. All of his life, the Elkmont area was dear to his memories. Back in 1930, he contracted Infantile Paralysis and he always credited the summer to escape to Elkmont each year with bringing about his favorable recovery. He was especially fond of the Wonderland Hotel, where the family used to go for some wonderful meals on the weekends. I’ll always remember my father attending breakfast at Wonderland on the last day it was open to the public in November of 1992.” (Individual, Franklin, TN; #19a)

“Yes, I am a former resident of Elkmont – one of the Mayo’s. My mother and her two brothers spent their summers in Elkmont from 1917 on, and I did the same from 1939 on. When I grew up and moved away to London, San Francisco, New York, and finally Los Angeles, I considered Elkmont my Tennessee home and carved out time every year to visit for several weeks at least. So, yes, Elkmont holds a deep place in my heart and I feel so strongly that other people should have the great joy of staying in our mountain paradise.” (Individual, e-mail, CA; #70a)

“As my grandmother said about Elkmont, there was not excitement on our family vacations. ...This tradition continues today with each of the many extended families, enjoying the natural surroundings and the beauty of a place with family as a vital part of our family history,

and I think that this speaks to the objectives that the Elkmont Historic District Planning has done when they have stated that preserving part of the history at Elkmont that we're fostering enjoyment, understanding, appreciation, and protection of a cultural resource that I think has been vital in the enjoyment that people have had with the natural resources that have been available in this natural park and all over the United States. It's that intangible feeling that we have with an attachment to something, myth and folklore, and just aspects of the cultural resource that would make, in my opinion, Alternative C the best thing to do with this project." (Individual, Public Hearing; #8c)

Response: Forty-nine of the seventy-four buildings that remain at Elkmont are considered contributing to the significance of the Historic District. The Park has proposed to retain and restore the core of the Appalachian Club, which includes seventeen contributing buildings and one non-contributing building that will be restored to the historic period. While this does not preserve the entire district, what remains today from the period of significance is only a fragment. The proposed core for preservation represents some of the best opportunities to provide the essence of what this community was, provide for public enjoyment through interpretive media and programs, and ensure that it can be preserved and maintained in the future.

25. Public Concern: Restoring buildings at Elkmont for day and overnight use will create a situation where a select group will be able to capitalize on these resources.

"As in most plans, the "devil is in the details." Unless the Park Service is very strict in enforcing a limit to the times a group can "tie up" the Clubhouse for its use, so that the clubhouse is available to many groups, it will revert to being as it was; a place for a select few. Of course the broader question is, is a meeting place of that size needed at all?" (Individual, Knoxville, TN; #14b)

"If this is a National Park for all to enjoy, but if the structures were restored and rented out, it would be like LeConte Lodge. Only a few privileged people would be able to use it. Besides, there's enough commercialization around the Park now and I am firmly against restoring those structures and I support Alternative A." (Individual, Public Hearing; #24c)

Response: The National Park Service recognizes the possibility of potential exclusivity and would ideally establish a system that would provide equitable access to these resources by all members of the public. In any system where limited resources are available to the general public, there is always a risk that one group will be able to monopolize those resources. As in the case with LeConte Lodge, the Park has moved to a system that provides a more fair access to that resource by members of the public than the old system where certain individuals were guaranteed automatic annual use of that resource, effectively preventing other members of the public the same level of access.

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26. Public Concern: Developing commercial services at Elkmont will impact the natural experience within the Park.

“My first visit to Yosemite National Park was about 5 yrs. ago. As we drove through the beautiful wilderness, the place seemed almost ethereal. Then we came to an area of commercialization: concrete, rental lodging, houses, stores, and debris. The same was true of other parks such as Yellowstone and Grand Canyon. I realize these parks were established in a different era. Please do not let this happen to the beautiful and unique Great Smoky Mountains National Park.” (Individual, Knoxville, TN; #15b)

“You have a very important job to do. The decision you make at Elkmont and North Shore will impact your grandchildren’s children’s future park experiences. Every inch you give away to commercialization and development allows Gatlinburg further and closer (to Clingman’s Dome!) and it encroaches on the natural wilderness. Please don’t let this happen.” (Individual, Knoxville, TN; #8b)

Response: The Park determined that a commercial concession to rent the cabins at Elkmont was not necessary and appropriate. The Preferred Alternative would not introduce commercial activities to the Historic District.

27. Public Concern: The Park can not possibly afford to preserve buildings within this district when the estimated capital investment would be very high, the foreseeable budget is very tight, and other defined projects lack funding.

“As for the hotel, it is probably not worth the expense and time of the NPS to restore to any sort of respectable, usable site when money is required for so many more pressing problems, such as eradication of the hemlock wooly adelgid before it can decimate the old growth hemlock stands of GSMNP, the last in the eastern US if not the entire US. There is never going to be enough money to purchase the quantities of predator beetles necessary and expensive imidacloprid soil-drenching pesticide necessary to prevent harm. So why divert fund to Elkmont? ...We believe in light of other national park needs, there is no justification in spending any NPS money at Elkmont except to do what is necessary to raze all structures there and remove all building materials so that this area can be returned to nature to be beautified through time back to its original unblemished state, as other formerly devastated areas of the park have been” (Individual, Dandridge, TN; #1b)

“Our National Parks are under funded because of many foolish projects like this. We have many areas that need more money. Trail maintenance is one example.” (Individual, Maryville, TN; #56b)

“While financial consideration should not, in an ideal world, dictate conservation policy, the fact that the conservation-friendly Alternative A is much LESS expensive than restoring the

buildings makes this a no-brainer. With all the urgent demands on the NPS budget, spending a dime of it on shoring up these structures would be a crime.” (Individual, e-mail; #68a)

“As we all know, the Park’s under-funded, it’s understaffed, it relies on groups like the Friends of the Smokies for partial financial support. As a Volunteer in the Park, I know that the Park relies a lot on volunteers for work at Sugarlands Visitor Center, maintaining trails in the backcountry, and I don’t think it’s a good idea for the Park to be looking at docking the capital expenses to restore the Elkmont community or the operating money that it’s going to take to maintain the community year after year. The Park doesn’t have the resources to do what it needs to do now. Essentially, funding a community – a new project at Elkmont is going to require us to take something from the Park that people are enjoying now, and I think that balance lies in trying to maintain the services and – the facilities of the Park as now.” (Individual, Public Hearing; #29c)

Response: The National Park Service must always balance competing resource needs and budgets. The existing budget is tight and the Preferred Alternative offers an opportunity to both preserve historic resources and restore natural processes to this area of the Park while at the same time offering the public diverse visitor experience opportunities. Although the initial cost of implementing Alternative C would be high, the cost of long term operation and maintenance would be achievable and also substantially off-set due to the incoming revenue from renting the clubhouse out as a day-use facility by the Park to the general public.

28. Public Concern: The Park will not be able to maintain these buildings when the Park can not meet the existing maintenance backlog.

“It is extremely irresponsible to place another burden on the NPS budget and the US taxpayers when the NPS cannot at this time be operated to properly serve the public as it should, because of a lack of funds.” (Conservation Organization, Knoxville, TN; #58b)

“The DEIS gives no hint of the source of any of the expenses for any alternative involving retention or rebuilding of structures. Nor does the DEIS give any hint of the source of any of the annual operating and maintenance expenses. It is well known that the Great Smoky Mountains National Park has a large and growing maintenance backlog. The DEIS does not tell us how the maintenance of any retained Elkmont Structures will be prioritized in the list of existing maintenance backlog. The public is entitled to know what parts of the existing maintenance backlog, if any, are to be pushed further back to accommodate Elkmont maintenance. If no money will come available from NPS appropriations for rehabilitation, operation or maintenance, that fact must be recited.” (Individual, Walhalla, SC; #36b)

“The Elkmont DEIS fails to address how the National Park Service (NPS) plans to pay for the restoration and maintenance of Elkmont Structures. NPCA cannot support the restoration and maintenance of any structures at Elkmont until NPS provides an analysis that demonstrates that funds are available for that long-term obligation. According to its latest

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business plan, Great Smoky Mountains National Park (GRSM) suffers from approximately \$11.5 million annual operations budget shortfall. NPS as a whole is operating with only about two-thirds of what it needs, approximately a \$600 million annual shortfall. The Park currently has a \$182 million maintenance backlog. The federal government has documented that NPS has a \$4.5 billion to \$9 billion maintenance backlog. The funding analysis in the DEIS must address the maintenance backlog priorities of GRSM. Where does maintenance spending on Elkmont fit into that priority list? ...Given the dire financial straits of GRSM and NPS as a whole how can park managers expect to meet the obligation of restoring and maintaining any Elkmont structures?” (Conservation Organization, Knoxville, TN; #37a)

“It makes no sense to preserve these cabins any longer when numerous historic structures in the park of more significance are falling apart. Please don’t let any additional valuable park operating funds be wasted on this issue.” (Individual, Knoxville, TN; #57a)

“I disagree with the Park Service’s preferred alternative at a cost of \$5.6 million and a significant environmental damage to this area. In light of the shortfall, the NPS budget, and the maintenance backlog, it would be irresponsible to commit to either \$5.6 million or \$3.2 million to reconstruct shacks in a National Park.” (Individual, Public Hearing; #21c)

Response: The high costs of preserving historic buildings and providing for their long-term maintenance are very real concerns, not just at Great Smoky Mountains NP but throughout the National Park System. The National Park Service faces difficult challenges in an era of declining budgets and maintenance backlogs to effectively carry out its diverse mission of preserving the nation’s cultural and natural resource heritage, while providing for quality visitor experiences and enjoyment. Identification of the agency’s preferred alternative for Elkmont reflects in part the difficult choices that the National Park Service is frequently called upon to make under the current and foreseeable government budgetary situation. A successful preservation effort at Elkmont would require a public/private partnership to ensure both the immediate and long term sustainability of the preservation efforts that will be implemented.

29. Public Concern: The buildings at Elkmont present a safety hazard for Park visitors.

“Please consider removing all of the Elkmont Colony buildings. They are currently an eyesore to the beautiful Smoky Mountains National Park. We hike out of Elkmont several times a year and when we return late, we feel very uneasy coming back to the area late at dark.” (Married Couple, Maryville, TN; #82a)

“I’m very familiar with the Elkmont area. I’ve always considered the cabins and the structures there an eyesore and a fire hazard.” (Individual, Public Hearing; #9c)

“I don’t have any connection with Elkmont as such. I’ve never stayed there except one time in the Wonderland Hotel, and I didn’t sleep very well that night because I slept with one eye open. It was a real fire trap.” (Individual, Public Hearing; #12c)

Response: The Park is always concerned about the health, safety and welfare of all Park visitors. The preferred alternative would provide a consolidated group of buildings that would be easier to manage than the entire collection the Park is tasked with maintaining currently. At present, the buildings and grounds are off limits to the public and Park Rangers frequently patrol the district to ensure the safety of all visitors and that trespassers are appropriately reprimanded and/or fined. For any building that is proposed for active use by the public, fire suppression systems, that were previously absent, will be installed and have been calculated in the estimated costs for rehabilitation.

30. Public Concern: The Park has allowed the buildings at Elkmont to deteriorate beyond repair in what appears to be “Demolition by Neglect”.

“Demolition by neglect is illegal, but that appears to have happened with the Hotel: delaying needed repairs until the hotel collapsed.” (Individual, San Francisco, CA; #33b)

“Yikes! Is this legal? The Park assumes responsibility of Wonderland and Elkmont in 1993. They allow demolition by neglect to occur on a massive scale for 7 years, then on a large scale for the next 6. The buildings listed on the Historic Register begin to fail and ultimately fall down from lack of care. THEN the park is allowed to “de-list” these historic structures? The Park is wanting to RE WRITE Historic nomination with 75% fewer structures and not be held accountable for the destruction that has purposefully occurred under their “care”.” (Preservation Organization, Knoxville, TN; #13a)

“Why was everything not kept up when everything was in a good state? The national park service and Tennessee government should take the blame. Upkeep wouldn’t cost as much as it will now.” (Individual, e-mail, TN; #14a)

Response: As money has become available, the Park has done what it could to stabilize the buildings at Elkmont. The construction methods and materials used in the Elkmont vacation buildings indicate that these structures were at best ephemeral shelters. For instance, many of the buildings at Elkmont, including the Wonderland Hotel were not even built with solid foundations, but rather constructed using post on stone. While this was a common practice at the time, especially for temporary structures, the hotel and most cabins were built using this technique, further indicating the temporary nature of these buildings. As the number of years eclipsed the realistic life expectancy of most Elkmont buildings, the cost and practicality of upkeep of these wooden buildings in an extremely moist and humid environment became exorbitant and highly consumptive of resources. Because these buildings were vacation cabins and because it would not have made good business sense to invest in properties that were slated for removal, maintenance on Elkmont buildings by lessees was minimal, especially in

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later years. Original materials were often substituted for more cost effective or easier to manage building solutions such as treated dimensional lumber or galvanized five-v metal roofing. Two to three years prior to the Wonderland Hotel being fully transferred to the Park, plastic tarps had been fastened to leaky places on the roof to keep the rain out.

Even after the Park took full control of the less than well maintained Elkmont buildings when leases expired and following listing on the National Register of Historic Places, the Park intended to document and remove all buildings, partially due to the condition and because this had been the direction dating as far back as Park establishment in 1934. Through consultation with the Tennessee State Historic Preservation Officer and eventually the Advisory Council on Historic Preservation the Park considered other options for some of the Elkmont buildings. Beginning in 1998, the Park began stabilization efforts throughout the District in an effort to preserve Elkmont buildings until a decision is made regarding the future management for this area within the Park. Stabilization work will continue as funding allows until a decision is finalized and implementation begins.

31. Public Concern: The condition assessment for the Wonderland Hotel was not conducted in a timely manner after the District was listed on the National Register of Historic Places.

“Why was the exterior assessment done 9 years after it’s lease expired and not in 1993 or 1994 when Elkmont was placed on the Historic Register? For that matter, why not a few years afterwards when public meetings started pertaining to Elkmont’s future once the Wonderland Hotel had historic register listing and status? Why ONLY an exterior assessment? The reasons written pertaining to carpeting and other obstacles obscuring the amount and severity of structural decay and problems from being visible simply are not believable or acceptable. ...Why 2003 instead of ten years earlier? 1993 or 1994 give a much more accurate, logical, honest date when Elkmont achieved historic register status. When the majority of the cabins and the Wonderland Hotel were vacated in 1992 they were in far better shape structurally and were still livable, due to the care and maintenance given them by those who held the leases, than in 2003. To wait ten years after the expiration of leases and inhabitation of structures to compile a structural assessment does not produce an accurate, honest structural assessment at all” (Individual, Shreveport, LA; #37b)

Response: In the beginning of 1993, shortly after the Wonderland Hotel was fully transferred to the National Park Service, it was evaluated and determined to be of questionable value due to the extremely poor condition and the exorbitant cost of rehabilitation. Not only was it determined in 1993 that the Wonderland Hotel was the single most expensive building related to rehabilitation, but it was also determined to have the highest cost per square foot of all the buildings located in Elkmont. As funding was available, three further condition assessments were performed in 2001, 2002 and 2003 and building stabilization was performed during that same time. In short, the Park performed four condition assessments between 1993 and 2003 and each assessment reported the hotel to be in extremely poor condition.

32. Public Concern: Inclusion of Cabin 42, Spence, was absent in the impact analysis for Alternative C, the preferred alternative.

“According to recent comments of Bob Miller, GRSM Public Relations, on May 6, 2006 Alternative C includes the restoration of the Spence Cabin (#42) in Millionaire’s Row for public rental for day-use events. Neither the DEIS made available to the public nor the DEIS updates provided by NPS include restoration and day-use of the Spence Cabin in Alternative C. Therefore, NPS has an obligation to republish the DEIS and provide the opportunity for the public to comment on this change to Alternative C.” (Conservation Organization; Knoxville, TN; #37a)

Response: The impacts related to the inclusion of this cabin have been fully described under Alternative D. Spence Cabin is proposed for consideration under Alternative C as mitigation. Because this mitigation is part of the proposed alternative, the analysis for alternative D should be referenced.

33. Public Concern: The Choosing By Advantages (CBA) decision-making process should have been included in the DEIS.

“After getting the Choosing by Advantages (CBA) document by filing a FOIA, I was surprised that this was only a 10-page document. Since this was how the preferred alternative was picked, why wasn’t it included in the DEIS? The cost analysis, which seems to be the final deciding factor, is included in Vol. II, so it would make sense to also include it the CBA. Why isn’t it?” (Individual, Maryville, TN; #30b)

Response: The CBA process is a method used throughout the National Park Service and this process was used to reach a decision on identifying a preferred alternative for this plan. A summary of this decision making process, that includes the primary decision factors, was included in the DEIS. The Council on Environmental Quality (CEQ) serves as the regulatory agency for upholding the purposes of the National Environmental Policy Act through specific regulation. CEQ specifically directs that NEPA documents shall be concise (40 CFR 1502.2), for proposals of unusual scope or complexity shall normally be less than 300 pages (40 CFR 1502.7), shall be written in plain language (40 CFR 1502.8), cost benefit analyses used to identify the preferred alternative shall be incorporated by reference (40 CFR 1502.23), and methodologies used and other sources relied upon for conclusions shall be referenced by footnote (40 CFR 1502.24). Considering the fact that this document was already exceptionally lengthy and detailed and because this document is to be written in plain language and is to be analytic rather than encyclopedic, the CBA decision-making process was summarized, rather than included in its entirety, in the report.

34. Public Concern: The Choosing By Advantages (CBA) decision-making process is erroneous and should be repeated.

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“The process used to choose the preferred alternative- CBA- is invalidated by the many errors and inaccuracies in the DEIS that I detailed in earlier comments. Your numbers, assumptions and conclusions are skewed in almost every subject area. The CBA process needs to be repeated after all the questions in the comments are addressed.” (Individual, Knoxville, TN; #121a)

“This process has also employed the notorious CBA process. Many of us know this can be easily manipulated to achieve a predetermined result and introduce facts or considerations that are slanted against resource preservation.” (Individual, Public Hearing; #4c)

Response: By policy, the National Park Service uses the CBA decision-making process to ensure a greater level of objective decision-making. Simply not liking or agreeing with the outcome or the process is not grounds for repeating this three day, interdisciplinary decision-making process. The NPS stands by the objectivity of the CBA process itself and the results for the Elkmont project.

6.4 LETTERS FROM FEDERAL AND STATE GOVERNMENT AGENCIES

The following are reprinted letters received from government agencies and National Park Service responses.

Letters from Federal and State Government Agencies



DEPARTMENT OF THE ARMY
NASHVILLE DISTRICT, CORPS OF ENGINEERS
3701 BELL ROAD
NASHVILLE, TENNESSEE 37214

May 1, 2006

REPLY TO
ATTENTION OF:

Regulatory Branch

SUBJECT: File No. 200600943; Draft Environmental Impact Statement, January 2006, Elkmont Historic District, Great Smoky Mountains National Park, Sevier County, Tennessee

Ms. Cathy Cook
c/o Superintendent
Great Smoky Mountains National Park
107 Park Headquarters Road
Gatlinburg, Tennessee 37738

Dear Ms. Cook:

Thank you for the opportunity to review the Draft Environmental Impact Statement (DEIS) and General Management Plan Amendment for the Elkmont Historic District (District) of the Great Smoky Mountains National Park (Park). As an agency whose authorities will potentially be involved in actions that the Park undertakes, we are pleased to be included in the early communications about the project, and to provide our views and comments. In future communications with the Corps of Engineers (Corps) concerning this matter, please refer to File Number 200600943.

Generally, the District's footprint identified in the DEIS document is an area containing Department of the Army (DA) jurisdictional waters. The Little River is considered a navigable water of the United States from its confluence with the Tennessee River upstream to mile 50.5 at Elkmont, Tennessee. Any activities such as bridge piers, bank stabilization, drainage structures, utility crossings, etc. may require a DA Permit under the authority of Section 10 of the Rivers and Harbors Act (33 USC 403) which prohibits the obstruction or alteration of navigable waters of the U.S. without a permit. Also, the Corps would exercise DA jurisdiction over waters of the U.S. under the authority of Section 404 of the Clean Waters Act (33 USC 1344) in the cases of discharge of dredged or fill material into such waters. This latter authority may include streams which are tributary to the Little River within the District including (but not limited to) Pine Knot Branch, Catron Branch, Mids Branch, Bear Wallow Branch, Jakes Creek, Tulip Creek, and Slick Limb Branch as well as ephemeral streams and certain wetlands.

6.0 PUBLIC AND AGENCY COMMENTS

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According to the information provided in the DEIS, the "No Action Alternative" and "Alternative A" would be least likely to require any DA permission. If roadways and other structures crossing wetlands, streams, and rivers require temporary, construction-related improvements, DA permission may be required.

According to Alternatives B through F, there would likely be improvements to roadways, trails, bridges, culverts, waterlines, as well as stream stabilization efforts all of which may require Section 10 or Section 404 approval before work could begin.

According to Alternatives D, E, and F, there would likely be new water and sewer lines in addition to the work referred to in the previous paragraph. Where these proposed lines cross wetlands, streams, and rivers, DA permission may be required. Also these last three alternatives appear to require more extensive roadway, trail, and bridge modifications which would likely require DA approval even if the improvements referenced in Alternatives A, B, C, and the "No Action" Alternative do not.

At this time the DEIS does not contain the details necessary for more specific permit evaluation. Once more detail of the project and design is available and the Park submits DA Permit application(s) identifying the specific impacts to waters of the U.S. we will be able to address your proposal more completely.

The design of any portion of the project should avoid impacts or adverse modification to the waters of the U.S. to the extent practicable. We echo your desire and intent found in the DEIS section 4.4.2.5, page 290 (also sec. 4.5.2.5, p. 306) to "...minimize potential impacts... to water quality." Two methods mentioned in this section are to attach utility pipelines to bridges to cross streams and to bore lines under the streambed to avoid undue disturbance to the stream substrate. Both methods are excellent means of avoiding both water quality impacts and, potentially, the need for DA permit. We encourage you to consider directional boring for the placement of utility lines under streams as this procedure avoids or minimizes navigation and water quality impacts. Constructing bridges (instead of culverts) that completely span streams, limiting approach fills to areas above the ordinary high water mark, and avoiding stream relocations and wetland fills should also be considered. These and other avoidance, minimization, and mitigation efforts should be clearly recognized in future documents, proposals, and applications.

We are available to meet and discuss our permitting requirements with you, and we would be interested in participating in any on-site inspections in an effort to better identify or confirm waters subject to our regulatory jurisdiction.


Letters from Federal and State Government Agencies

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We would appreciate the opportunity to review the subsequent drafts and/or final EIS document when it becomes available.

If you have any questions, or wish to discuss DA permit requirements in more detail, please contact me at the above address or telephone (615)369-7519.

Sincerely,

A handwritten signature in dark ink, appearing to read "J. Ruben Hernandez", with a long, sweeping horizontal stroke extending to the right.

J. Ruben Hernandez
Project Manager
Operations Division

6.0 PUBLIC AND AGENCY COMMENTS



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION

May 8, 2006

Mr. Dale A. Ditmanson
National Park Service
Great Smoky Mountains National Park
107 Park Headquarters Road
Gatlinburg, Tennessee 37738

Dear Superintendent Ditmanson:

I am pleased to be commenting on the Draft Environment Impact Statement (DEIS) for the Elkmont Historic District project on behalf of the Tennessee Department of Environment and Conservation, Division of Natural Heritage (DNH). In reviewing the document, the DNH supports Alternative C which is the environmentally preferred and agency preferred alternative referenced in the DEIS.

The decision making process that NPS employed, CBA "Choosing By Advantages," which analyzed each alternative for potential benefits and negative benefits and analyzed the cost benefit of each proposed alternative, was a reasonable approach to determine what the preferred alternative should be in light of the complexity of the many factors to consider. As stated in the DEIS, alternative C achieves a strong balance between all factors evaluated with significant weight given to potential impacts to cultural and natural resources. DNH agrees with the statement that Alternative C "best protects, preserves and enhances the cultural, historic, and natural resource of Elkmont Historic District by causing.....the least damage to the biological and physical environment."

DNH is particularly interested about the biological and physical environment. DNH supports restoration of native vegetation with special consideration given to protection of the globally rare montane alluvial forest found in the District. DNH recognizes that this much disturbed area and support all acts to eradicate exotic plant species in the restoration process. Also as state agency DNH supports a balanced approach to preserve the historic integrity of the District, which is necessary because of various state and federal requirements.

DNH recognizes that cultural, historic, and natural resource protection must be addressed through the EIS and finds the preferred Alternative C to best approach to accomplish those goals

Letters from Federal and State Government Agencies

Mr. Dale R. Ditmanson
May 8, 2006
Page Two

in managing the Elkmont Historic District project. Please feel free to contact DNH if you have any questions or concerns about these comments.

Sincerely

A handwritten signature in cursive script, appearing to read "Brian Bowen".

Brian Bowen, Administrator
Tennessee Natural Areas Program.

BB:pm

Division of Natural Heritage, 7th floor L&C Annex, 401 Church Street, Nashville, Tennessee 37243

6.0 PUBLIC AND AGENCY COMMENTS



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

May 11, 2006

Mr. Dale A. Ditmanson, Superintendent
National Park Service,
Great Smoky Mountains National Park
107 Park Headquarters Road
Gatlinburg, TN 37738

**RE: EPA Review Comments on
Draft Environmental Impact Statement (DEIS)
Great Smoky Mountains National Park
Elkmont Historic District
CEQ No. 20060042**

Dear Mr. Ditmanson:

The U.S. Environmental Protection Agency (U.S. EPA) Region 4 reviewed the subject Draft Environmental Impact Statement (DEIS) pursuant to Section 309 of the Clean Air Act, and Section 102 (2)(C) of the National Environmental Policy Act (NEPA). The purpose of this letter is to provide you with EPA's comments.

The DEIS assesses the potential environmental impacts of management plan for the Great Smoky Mountains National Park, Elkmont Historic District. Alternative C is identified as the NPS preferred alternative and the environmentally preferred alternative. Alternative C retains the Appalachian Clubhouse and 16 historic district buildings in Daisy Town. In the areas where buildings will be removed, native plant communities and natural systems will be restored, including sensitive plant community types. Visitor uses would occur in areas away from these areas in order to permit plants to regenerate without impacts from visitors.

Alternative C will require efforts to mitigate, minimize and avoid impacts to archeological resources. Unavoidable impacts to buildings within the Elkmont Historic District will be mitigated in accordance with a mitigation plan to be developed in consultation with the SHPO, the Advisory Council on Historic Preservation, the Chickasaw Nation and the Eastern Band of the Cherokee Indians THPO, and in accordance with the National Historic Preservation Act.

The DEIS notes that the entire Park was designated non-attainment for the 8-hour ozone National Ambient Air Quality Standards, on April 15, 2004. Visitor use is expected to increase, and this could potentially impact emissions.

Letters from Federal and State Government Agencies

Based on EPA's review of the DEIS, the preferred alternative for managing the Park received an "LO" rating, meaning that the EPA review did not identify any potential environmental impacts requiring substantive changes to the proposal.

Thank you for the opportunity to comment on this project. If we may be of further assistance, please contact me or Ramona McConney of my staff at (404) 562-9615.

Sincerely,

A handwritten signature in cursive script, appearing to read "Heinz Mueller".

Heinz Mueller, Chief
NEPA Program Office
Office of Policy and Management

6.0 PUBLIC AND AGENCY COMMENTS



Tennessee Valley Authority, 400 West Summit Hill Drive, Knoxville, Tennessee 37902-1499

May 11, 2006

Mr. Dale A. Ditmanson
Superintendent
Great Smoky Mountains National Park
107 Park Headquarters Road
Gatlinburg, Tennessee 37738

Dear Mr. Ditmanson:

**DRAFT ENVIRONMENTAL IMPACT STATEMENT (EIS) AND GENERAL
MANAGEMENT PLAN AMENDMENT--ELKMONT HISTORIC DISTRICT, SEVIER
COUNTY, TENNESSEE**

Thank you for the opportunity to review the EIS on alternatives for management of the Elkmont Historic District. It appears that the major environmental issues have been addressed. The following suggestions are provided:

- Section 2.3, Preferred Alternative. The discussion describes how alternative C would be consistent with Section 101 of National Environmental Policy Act. You may also wish to include a similar discussion with regard to the other alternatives, consistent with 40 CFR 1502.2 (d).
- Section 4.10, Compliance with Federal and State Laws, Executive Orders and Regulations. The bridge widening on the road across from the Wonderland Hotel under Alternatives E or F would likely require review under Section 26a of the TVA Act.

We look forward to reviewing public comments on the Draft EIS and working with National Park Service and other cooperating agencies to produce a final document. Should you have any questions, please contact Harold M. Draper at (865) 632-6889.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jon M. Loney".

Jon M. Loney, Manager
NEPA Policy
Environmental Stewardship and Policy

Park Response to Tennessee Valley Authority:

Comment has been addressed in text with regard to Section 101 of the National Environmental Policy Act.

6.0 PUBLIC AND AGENCY COMMENTS



TENNESSEE HISTORICAL COMMISSION
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
2941 LEBANON ROAD
NASHVILLE, TN 37243-0442
(615) 532-1550

August 23, 2006

Mr. Dale A. Ditmanson
Superintendent
Great Smoky Mountains National Park
107 Park Headquarters Road
Gatlinburg, Tennessee, 37738

RE: NPS, ELKMONT HISTORIC DISTRICT, SEVIER COUNTY, DEIS REVIEW AND RESPONSE
TO CONSULTING PARTIES MEETING

Dear Mr. Ditmanson:

In response to a Draft Environmental Impact Statement (DEIS) submitted for TNSHPO review and comment and received on February 10, 2006, a subsequent consulting parties meeting held on July 20, 2006 called to discuss the DEIS's Preferred Alternative (Alternative C) for treatment of historic properties within the Elkmont Historic District, and a follow up letter from yourself to us dated July 27, 2006, we have the following comments relative to Section 106 of the National Historic Preservation Act.

Considering available information, we concur with your finding, after applying the Criteria of Adverse Effect codified at 36 CFR Part 800.5, that the undertaking as currently proposed (Alternative C) will adversely affect properties that are eligible for listing in the National Register of Historic Places.

It is clear from a review of the National Park Service's (NPS) environmental document that the undertaking as currently proposed involves extensive ground disturbance, partial and complete demolition of existing historic buildings, modification of existing historic buildings, and modification of the associated historic landscape and view shed. The NPS has found that the undertaking (Alternative C) as currently proposed constitutes an adverse effect to properties eligible for listing in the National Register of Historic Places because of the demolition of the Wonderland Hotel and Annex, associated Wonderland buildings, associated Society Hill buildings, and associated Millionaires' Row buildings. Modifications to the historic landscape also constitute an adverse effect because of changes in character and setting. Rehabilitation of existing associated contributing buildings and disturbance of known archaeological resources may also constitute an adverse effect depending on the nature of the rehabilitation. We concur.

The DEIS proposed several alternatives to the NPS's Preferred Alternative include: a No Action Alternative based upon the 1982 General Management Plan, Alternatives A and B, and Alternatives D, E, and F. The NPS has found that all these currently proposed alternatives have associated adverse effects to historic properties. We concur with this finding as well as the NPS's assertion that the level of adverse effects upon historic properties diminishes as one moves from the No Action Alternative to Alternative F (please see DEIS Table 4-13).

Letters from Federal and State Government Agencies

Mr. Dale A. Ditmanson
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Background:

We concur with the NPS that the undertaking under review is the Great Smoky Mountains National Park's Preferred Alternative as defined in the Draft Environmental Impact Statement (DEIS). This alternative calls for the retention of the Daisy Town cabins and their exterior restoration as exhibit features, exterior/interior rehabilitation of the Appalachian Clubhouse for day use rental, restoration of the exterior of the Chapman Cabin in Society Hill for use as an exhibit feature, exterior restoration and interior rehabilitation of the Spence Cabin in Millionaires' Row for day use, and establishment of a new boundary for the Elkmont Historic District within a new historic context after completion of the work. This alternative also calls for the demolition and removal of all other historic properties within the Elkmont Historic District.

The NPS's stated rationale for the selection of Alternative C as the NPS Preferred Alternative is that it best balances the protection of cultural and natural resources at Great Smoky Mountains National Park (GSMNP).

We concur that the consulting parties in this Section 106 review are: the Tennessee State Historic Preservation Officer (James Fyke), The National Trust for Historic Preservation (Richard Moe), the Smoky Mountain Hiking Club (Mark Shipley), the Eastern Band of Cherokee Indians, the Cherokee Nation, the National Parks Conservation Association (Gregory S. Kidd), Elkmont for All Preservation Committee (Lynn Faust), the Sierra Club, (Don Richardson and Ted Snyder), and the Advisory Council on Historic Preservation (Martha Catlin).

We concur that the National Register of Historic Places eligible properties within the overall Area of Potential Effects (APE) for this undertaking include: ten associated Wonderland cabins considered contributing elements; the Wonderland Hotel, the Wonderland Hotel Annex, the Appalachian Club including the Appalachian Clubhouse and 15 associated Daisy Town contributing elements; Society Hill including 16 contributing elements; and Millionaire's Row including six contributing elements. There is also an historic landscape that encompasses the view shed of the historic district. There are also a number of potentially significant archaeological resources located within the APE.

Where we are now in the Section 106 process:

We feel that the Section 106 consultation relative to this undertaking has reached Step Four: Resolve Any Adverse Effect. As you know, there are several requirements of Step Four (36 CFR Part 800.6). They include:

1. *Continue consultation.* The NPS, this office, other consulting parties and the Advisory Council are continuing to consult on this undertaking.
2. *Develop, assess, and evaluate alternatives or modifications to the undertaking that would avoid or minimize project related adverse effects.* We feel strongly that the completion of the

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Mr. Dale A. Ditmanson
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DEIS process does not preclude further evaluation of avoidance or minimization alternatives based upon continuing consultation associated with Section 106 review. We believe that further evaluation of comments by consulting parties can and should lead to further consideration of alternatives before the NPS issues a Final EIS and/or to the substantive modification of the currently preferred alternative to avoid or minimize its impacts.

3. *Seek the views of the public.* We feel that unless NPS develops substantive additional alternatives, we see little reason to solicit any further public comment. We believe that the public has had ample opportunity through a number of public hearings to review and comment upon the environmental document. There are extensive public comment documents that NPS has shared with us and other consulting parties.

4. *Notify the Advisory Council on Historic Preservation (ACHP) of the adverse effect determination and invite ACHP participation in the consultation.* That has been done.

Documentation Requirements:

36 CFR Part 800.6(e) finding of no adverse effect or adverse effect documentation shall include:

(1) *A description of the undertaking, specifying the Federal involvement, and its Area of Potential Effects (APE), including photographs, maps, and drawings, as necessary. We feel that this condition has not been met satisfactorily within the DEIS.* We request that the NPS provide us and other consulting parties detailed overlay maps that define the APE of Alternative C and the other considered alternatives in relation to the four stated elements that drove the NPS's Choosing By Advantages process (Protection of Natural Resources; Protection of Cultural Resources; Provision for Visitor Education and Enjoyment; and Protection of Public Health, Safety, and Welfare).

(2) *A description of the steps taken to identify historic properties.* We feel that this condition has been met satisfactorily, with the understanding that identification of archaeological resources has not yet been completed and will continue in a phased manner based on the NPS final selected Alternative.

(3) *A description of the affected historic properties, including information on the characteristics that qualify them for the National Register.* We feel that this condition has been met satisfactorily with the understanding that identification of archaeological resources has not yet been completed and will continue in a phased manner based on the NPS final selected Alternative.

(4) *A description of the undertaking's effects on historic properties.* We feel that this condition has been met satisfactorily with the understanding that identification of archaeological resources has not yet been completed and will continue in a phased manner based on the NPS final selected Alternative.

(5) *An explanation of why the criteria of adverse effect were found applicable or inapplicable, including any conditions or future actions to avoid, minimize or mitigate adverse effects.* We feel that this condition has not been met satisfactorily. We request that the NPS propose and diligently examine alternatives that would avoid all adverse effects to historic properties.

and

Letters from Federal and State Government Agencies

Mr. Dale A. Ditmanson
August 23, 2006
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(6) *Copies or summaries of any views provided by consulting parties and the public.* As stated earlier, we feel that this condition has been met satisfactorily.

Consultation:

At the end of the July 20 consultation meeting, the consulting parties present agreed upon a list of steps the NPS will take to further Section 106 review of the Elkmont undertaking. The NPS will:

Propose and evaluate alternatives that would avoid adverse project effect to Elkmont Historic District

Your letter to us dated July 27, 2006 requested that the Tennessee SHPO's office provide comments on the Park's maximum avoidance (avoiding adverse impacts to historic properties) Alternative F2. We do not consider Alternative F2 as a valid avoidance alternative (please see Appendix A). We request, therefore, that the NPS propose and evaluate alternatives that will avoid all adverse effect to the historic properties contained within the Elkmont Historic District.

Propose and evaluate alternatives that would minimize adverse project effect to Elkmont Historic District

The DEIS contains several alternatives that the NPS has proposed and evaluated to minimize adverse effect to the historic properties contained within the Elkmont Historic District, and we commend the NPS for having considered them. Your July 27, 2006 letter offers to provide descriptions of proposed techniques to minimize adverse effects to historic properties. We would welcome the opportunity to review a listing of these minimization proposals. As stated earlier, we believe that in view of the substantive amount of public comment, very little of which was favorable to Alternative C, as well as comments by consulting parties, the NPS may want to reconsider its preferred alternative before moving to a Final Environmental Impact Statement.

Provide answers to substantive consulting party questions raised consequent to the DEIS process.

Various consulting parties have raised a number of substantive questions that we request NPS address to further the Section 106 process for this case. Though we understand that the consulting parties are to reiterate in writing the questions raised at the meeting on July 20 or previously in comments about the DEIS, please see Appendix B for our understanding of the questions raised. We will be looking to the NPS for answers to these consulting party questions.

Provide answers to substantive SHPO questions raised during the consulting parties meeting.

Following is a synopsis of SHPO questions.

1. **Alternatives that avoid adverse effects:** One of the stated purposes of the agenda for the July 20 consulting parties meeting was to consult on "strategies to avoid, minimize, or mitigate the major adverse effect to the Elkmont Historic District with implementation of the Agency Preferred Alternative - C - as identified in the DEIS for Elkmont." Very little time during the consultation meeting was devoted to this topic. Will the NPS now seriously propose and evaluate alternatives that would avoid all adverse effect to historic properties, and, if so, will the NPS share the results of that proposal and evaluation with us and the other consulting parties?

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Mr. Dale A. Ditmanson

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2. **NPS prioritization of project effects:** Did the NPS prioritize the relative effects of each Alternative on each of the different resource variables and considerations listed in Table 4-13 of the DEIS? Did the NPS use the Choosing By Advantages process to prioritize project effects? Did the NPS matrix a priority list from highest to lowest level of effect for each Alternative? Could the NPS do so and share that redrafted prioritization matrix with us? Will the NPS distribute copies of its Choosing By Advantages document to all consulting parties since none were distributed during the consulting parties meeting held on July 20? The DEIS states that this document formed the basis of the Park Service's decision making relative to selecting Alternative C as the Preferred Alternative. Right now, the NPS's stated rationale for choosing Alternative C in the environmental document is that it "balances protection of cultural and natural resources." We feel that a prioritization matrix carried in the CBA document that would justify this assertion is missing from the environmental document and would be helpful to have. It appears that the NPS's selection of C as the preferred alternative is based more on the CBA process than on the impacts and advantages described in the DEIS. It is possible that our examination of the CBA document and the prioritization process that created it will generate additional questions about the assumptions and methodologies underlying it.
3. **The comments of Tribes:** Please share the review comments of the Federally recognized tribes with respect to the DEIS.
4. **NPS internal policies:** It appears that much of the decision-making regarding the selection of Alternative C as the NPS's preferred alternative resulted from various NPS internal policies. For example, could the NPS provide additional discussion of the Section 106 implications of "Special Use Permits" since these are included as a part of Alternative C for the Appalachian Club? "Park Operations," "Visitor Experience," "Sustainability," "Balancing Natural and Cultural Resources," and "Visitor Carrying Capacity" seem to be the dominant drivers for NPS deciding on Alternative C as the preferred Alternative. These elements of prioritization are mentioned specific to each Alternative presented in the DEIS. Could NPS elaborate on how these various elements interrelated within the DEIS process and influenced its outcome? Did the DEIS process change the NPS's thinking concerning the relative weight of any of these elements?
5. **Concessionaires:** Possible concessionaire interest in Elkmont would seem to be a legitimate driver for increased cabin retention and use. What due diligence was done to identify potential concessionaires? We presume that a potential concessionaire would share revenue with NPS for renting its cabins, but there seems to be no financial cost/benefit analysis for concessionaire use of Elkmont cabins. We are especially concerned about the NPS's apparent rejection of the use of concessionaire partnerships during their Choosing by Advantages process based on internal NPS policies, although the NPS stresses the need for such partnerships in other policies. It is not at all clear why the NPS decided that concessionaire operations at Elkmont were not "necessary and appropriate" particularly in view of similar lodging concessions in other Parks. In view of the decisive nature of the cost considerations in the CBA process as described at the meeting, the failure to consider the possibility of revenues to offset costs appears to seriously bias the outcome of the prioritization process.
6. **NPS evaluation of associated costs:** We need more information concerning the NPS's cost evaluations of various alternatives. How were the cost figures arrived at and are they valid and consistent? We understand that, according to the CBA process, Alternative D was the original preferred alternative, yet it was rejected by the NPS in favor of Alternative C because of the associated costs of the two alternatives. How did NPS determine that the cost would increase from approximately \$7m to approximately \$20m between Alternatives C and D? The cost figures lower considerably if the NPS removes the Wonderland Hotel reconstruction from Alternatives D, E, and F. How was this factored into the decision making process? Though the

Mr. Dale A. Ditmanson
August 23, 2006
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reconstruction of the Wonderland may or may not be desirable from other standpoints, this office has made clear its position that reconstruction is not preservation and the reconstruction of the Wonderland should not endanger the preservation of structures at Elkmont that may still be feasibly rehabilitated. What are the financial advantages to the NPS for demolishing the structures called for in Alternative C? What NPS-generated and other funds are currently being spent that could be saved and allotted to preservation of the structures included under Alternative C? In view of the limited use to be made of the cabins to be retained under Alternative C what is the basis for NPS's confidence that C is a sustainable alternative over time and will not merely add to the considerable backlog of unmet maintenance needs that the Park has at present?

7. **Montane Alluvial Forest:** The level of endangerment of the Montane Alluvial Forest by its proximity to Elkmont seems to be a special NPS issue of concern. Will the NPS discuss in greater detail the nature of that endangerment? Can the NPS discuss the specific endangerment caused by Alternative C? Will the NPS discuss the level of endangerment associated with the nearby existing campground and proposed new parking areas? The DEIS estimates there are currently 6,590 acres of Montane Alluvial Forest within the boundaries of GRSM. The gain in acreage in which this forest type could be regenerated (it apparently is very minimal in the APE at present) would appear to be only a few acres under the most liberal possible estimate, less than 1/4th of one percent of the total. Why is this small gain of such importance as to outweigh the permanent loss of significant cultural resources?

8. **Other review authorities:** The admonitions of federal and state review agencies and their evaluation of the effects of various project alternatives upon natural and other resources are part of the comment record for the environmental document. How do those admonitions and evaluations affect Alternative C and other alternatives?

9. **National Register boundary re-evaluation:** The DEIS states that the implementation of Alternative C will necessitate the re-evaluation of the boundary of the Elkmont Historic District. How does NPS propose to re-evaluate that boundary? It is our belief that, in fact, the Elkmont Historic District will no longer exist if Alternative C is implemented and that the remaining buildings will have to be assessed to determine if they are eligible for the National Register when the project is complete. This is not the same as simply re-evaluating the boundary.

10. **Public and consulting party reaction to Alternative C:** In December 2004, Alternative C was determined by NPS to be the preferred Alternative after all proposed alternatives were subjected to the Choosing by Advantages process. The DEIS mirrors that determination. Yet, the 18-month DEIS process reveals that none of the consulting parties agree in substance with Alternative C as their preferred Alternative, and very few of the members of the public agree with Alternative C. Why then does the NPS still prefer Alternative C? Why has the NPS not altered its December 2004 position in the face of so much public and consulting party opposition to Alternative C?

11. **Wastewater treatment implications:** What engineering studies or analyses were done of the various alternatives for wastewater handling that could decrease either the cost or the environmental impact of wastewater treatment for those alternatives that would entail a more intensive use of the Elkmont cabins and/or the Wonderland.

12. **Proposed new parking spaces:** What analysis or assumptions form the basis for the number of parking spaces needed for the various alternatives? The large amount of additional parking proposed would appear to have a significant impact to both natural and cultural

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Mr. Dale A. Ditmanson
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resources, particularly to water resources from run-off. Are these large numbers really necessary?

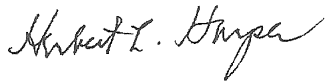
Additional documentation to be provided:

Provide a graphical set of overlays for the APE of each of the four key areas that guided the Choosing by Advantages process (Protection of Natural Resources: Protection of Cultural Resources: Provision for Visitor Education and Enjoyment: and Protection of Public Health, Safety, and Welfare). Your July 27, 2006 letter proposes including overlay maps in the Final EIS regarding Section 106 Area of Potential Effect. We would prefer that you make these overlay maps available to us and other consulting parties before you issue the FEIS so that they can inform the Section 106 consultation process.

Next Steps:

As agreed on July 20, the NPS will make its best effort to propose and evaluate avoidance alternatives, answer the substantive questions raised by this office, the Advisory Council, and other consulting parties, and distribute graphical overlays of the various Areas of Potential Effect to all consulting parties. Upon receipt of this documentation, we will review and comment promptly so that we may expedite consultation on this undertaking. We appreciate the opportunity to continue consultation to resolve project-related adverse effects on the Elkmont Historic District. We trust that this letter has clarified our issues of concern and has afforded the NPS guidance in specific ways it can address those concerns. We appreciate your continuing cooperation.

Sincerely,



Herbert L. Harper
Executive Director and
Deputy State Historic
Preservation Officer

HLH/jyg

Xc: Martha Catlin, ACHP



Appendix
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Appendix A

Effects to Elkmont Historic District from Alternative F

According to various statements contained within the DEIS

- "Alternative F entails the retention of all of the historic buildings in the District, with the exception of six (?) cabins and a garage that are too structurally deficient to retain."
- "Under F1, three (?) Contributing buildings would be removed. Under F2, one contributing building would be removed and the Wonderland Hotel would be reconstructed with a rehabilitated Annex."
- "Implementation of Alternative F would result in direct, permanent, minor, adverse effects to the aboveground cultural resources of the Elkmont Historic District."
- "The excavation and other ground disturbance associated with Alternative F could adversely affect archeological resources. These impacts would be permanent, direct, adverse, and could be major."
- "Under Section 106 of the National Historic Preservation Act, the removal of one to three contributing buildings within the NRHP- listed Elkmont Historic District would constitute an adverse effect. The potential effects to archeological resources under Alternative F could also result in a determination of adverse effect."

The DEIS clearly states, and we concur, that Alternative F would adversely affect contributing buildings within the Elkmont Historic District. It cannot, therefore, be considered by us to be an avoidance alternative.

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Appendix B

Summary of Consulting Parties Comments and Questions as Understood by Tennessee SHPO

1. **Concessionaire operations:** The Draft Environmental Impact Statement states that the NPS has determined that concession operations are not necessary or appropriate and should not be implemented. Consulting parties question this determination in view of the perceived inconsistency in the application of the policy on which it supposedly is based across the system of National Parks.
2. **Endangered natural resources:** The NPS asserts that Elkmont is endangering natural resources with which it shares space when it appears from the DEIS that the Elkmont Historic District is host to thriving natural resource communities that do not seem endangered by the buildings contained within the historic district. Why is this?
3. **Building stabilization:** Consulting parties question NPS's lack of protection and stabilization of the contributing buildings within the Elkmont Historic District during the intervening years since 1992 when the tenant leases expired and before there was final Section 106 resolution. If the NPS was seriously considering alternatives that would preserve all or most of the buildings, why were they not better maintained?
4. **Prioritization of natural resources over cultural resources:** Why has NPS assigned so much weight and attention to the Montane Alluvial Forest that is currently only minimally identified as existing within the project APE at the expense of the historic buildings within the Elkmont Historic District that are very much in evidence. These questions gain in importance with the information contained in the environmental document that there are at present a number of other areas in the park where the Montane Alluvial Forest is in evidence. If the Montane Alluvial Forest is of such importance why is the NPS not considering the removal of the campground at Elkmont?
5. **Carrying capacity:** Consulting parties have questioned the correctness of the NPS's analysis of the impact of Alternative C on the Little River.
6. **Sustainability:** The NPS's decisions to limit the number of cabins slated for active use under Alternative C have implications for the future sustainability of the historic properties rehabilitated under Alternative C if there is little if any revenue derived by the NPS from these properties. How can such a passive use of the remaining structures be expected to attract partnerships to assist with their long-term maintenance?
7. **Budget:** What budgetary planning and funding availability is there for implementation of Alternative C. The fiscal commitment of Alternative C seems far beyond that of the 1982 GMP proposal (removal of all Elkmont cabins and structures).
8. **"Preserve America:"** To what degree was Presidential Executive Order 13287 "Preserve America" factored into the NPS's decision making relative to Alternative C?