United States Department of Interior
National Park Service
Great Smoky Mountains National Park
107 Park Headquarters Road
Gatlinburg, TN 37738
(865) 436-1238

FINDING OF NO SIGNIFICANT IMPACT

Great Smoky Mountains Institute at Tremont

Development Concept Plan/Environmental Assessment

The Preferred Alternative does not constitute an action that normally requires preparation of an Environmental Impact Statement (EIS) in accordance with the regulations issued by the Council on Environmental Quality. The Preferred Alternative will not have a significant effect on the human environment. There are no significant impacts to physical resources, water resources, natural resources, cultural resources, or other unique resources within the region. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified.

After careful and thorough consideration of the facts contained herein, the undersigned finds that the proposed Federal actions are consistent with existing national environmental policies and objectives as set forth in section 101(a) of the National Environmental Policy Act of 1969 (NEPA) and that they will not significantly affect the quality of the human environment or otherwise include any condition requiring consultation pursuant to Section 102(2)(c) of NEPA.

Based on the foregoing, it has been determined that an EIS is not required for this project and thus will not be prepared.

Recommended: _____ 6/22/10

for Dale A. Ditmanson — Date
Superintendent
Great Smoky Mountains National Park

Approved: _____ 6/28/10

For David Vela — Date
Regional Director
Southeast Region

FINDING OF NO SIGNIFICANT IMPACT

Great Smoky Mountains Institute at Tremont

Development Concept Plan/Environmental Assessment

INTRODUCTION

The Great Smoky Mountains Institute at Tremont (hereinafter referred to as "Tremont") is an independent non-profit 503(3)(c) organization that operates under a Cooperative Agreement with the Great Smoky Mountains National Park. Tremont is located on an approximate 10-acre parcel of land next to the Middle Prong of the Little River, approximately 5 miles south of Townsend, Tennessee.

The overall purpose of Tremont is to serve as the primary residential environmental education facility for the Great Smoky Mountains National Park (hereinafter referred to as the park). Tremont provides programs that meet environmental education goals and principles as an extension of the park's Division of Resource Education. Residential environmental education programs have been conducted in the park at Tremont since the mid-1980s. Prior to January 2001, these programs were operated under the auspices of the Great Smoky Mountains Natural History Association.

Tremont serves a critical role in providing training opportunities and networking for those persons who are interested in empirical and field-based education methods. The facility serves as a learning laboratory for teachers who may later bring their groups to the park. It is also a training ground for young professionals who gain experience in the field of place-based education and interpretation.

Tremont's curriculum provides opportunities for students to experience science first-hand by providing a total educational immersion into the natural and cultural environment of the Southern Appalachians. Students learn, develop, and apply skills as resource stewards, both at Tremont and upon returning home. Tremont provides in-depth experiences through educational programs designed to nurture appreciation of the Great Smoky Mountains National Park, celebrate diversity, and foster stewardship.

The National Park Service is proposing to improve and/or construct new environmental education facilities at Tremont. The purpose of the proposed action is to redesign the existing facilities to be more energy efficient, flexible, environmentally friendly, and sustainable. This action is needed because the buildings at Tremont are over 40 years old and are steadily deteriorating. The original buildings were also not designed for their present purpose and uses, and limit the ability of the Tremont to meet its program goals.

Tremont was originally a Job Corps center built by the U.S. Department of Labor in the Great Smoky Mountains National Park. While new facilities such as staff housing were added over time, the overall footprint of Tremont has decreased due to the removal of numerous buildings. Today, the remaining structures total approximately 34,852 square feet of space in either enclosed buildings or covered space. The following is a summary of the existing facilities:

- **The Activity Center/ Dining Facility** includes a Kitchen and Dining Hall, General Activity room, first aid room, the Spruce Fir meeting room (and one adjacent upstairs room), a Science room, a storage area, bathrooms and showers, the Mountain Room, and an entrance room.

- **Quarters** include a large dormitory and bathrooms, seasonal quarters for staff, the Oasis quarters (for staff), and the Director's quarters.
- **Administration Space** includes the book store, office space, a carpenter shop, a garage, and a storage area.
- **Shelters** include a steel picnic shelter, the river house (streamside science laboratory/workplace), two friendship circle shelters, an outdoor class room, an arrival shelter, and an oil and paint shed.
- **Wastewater Treatment facilities** include storage/settling tanks on the west side of the Middle Prong of the Little River and pumps connected via an underground pipeline to two infiltration ponds located on the east side of the Middle Fork.

PREFERRED ALTERNATIVE

Alternative C - **Modification to Existing Facilities (Moderate)**

The Preferred Alternative, Alternative C, consists of implementation of moderate upgrades, modifications, additions, and spatial reconfiguration of the infrastructure and existing facilities at Tremont. Implementation of the Preferred Alternative would optimize classroom and office space efficiency, utilization, functionality, energy conservation, and visual quality. The Preferred Alternative also includes an option for either rehabilitating the existing dormitory or construction of a new dormitory (both using sustainable design principles). These changes would further enhance awareness and educational opportunities provided at Tremont. The specific improvements proposed for the Tremont facilities under the Preferred Alternative include the following:

Activity Center / Dining Facility:

- Provide sound proof classrooms;
- Upgrade the heating, ventilation, and air conditioning systems and mechanical systems, utilizing sustainable system design;
- Rehabilitate 2nd floor space attic in Activity Center;
- Install new, strategically placed, larger, energy efficient, operable windows;
- Provide Americans with Disabilities Act (ADA) compliance throughout the facility;
- Enlarge and reconfigure existing restroom facilities to comply with ADA;
- Modify the exterior elevations and roof lines to improve visual qualities and to blend with the national park setting.

Dormitory:

- Rehabilitation option:
    - Rehabilitate existing dormitory or construct a new dormitory in its current location, including 2-story ADA compliant restrooms additions to each end of the existing dormitory, utilizing sustainable design;
    - Reconfigure/renovate dormitory spaces to enhance compliance with the ADA and to improve utilization potential and increase flexibility; and
    - Modify the exterior elevations and roof lines to improve visual qualities and to blend with the national park setting.

- Replacement option
    - If replaced, a new dormitory would be constructed using sustainable design principles (Leadership in Energy and Environmental Design Silver rating at a minimum).

Site/Infrastructure:

- Upgrade or replace existing wastewater treatment plant.
- Improve the site storm water drainage system between the existing dormitory, main pavilion and activity center/dining facility.
- Reconfigure road and parking lot to provide separation between automobile and pedestrian traffic.
- Reconfigure and improve access to existing trail heads to minimize conflicts with Tremont.

General:

- Sustainable principles would be utilized during the entire renovation/construction process.
- Native plant material would be strategically located to create outdoor space and to help moderate climatic extremes.

There would be no improvements to the river house, administration/office, or main pavilion. The existing Oasis House ranger station and staff housing would remain onsite with no improvements.

OTHER ALTERNATIVES CONSIDERED

The No Action and three other action alternatives (B, D and E) were considered. The No Action alternative involves continuation of the operation of the existing facilities and educational programs at Tremont. Problems associated with deteriorating buildings and facilities would continue to occur. Problems with the aging wastewater treatment plant, inefficient heating, ventilating, and air conditioning system in the dormitory and deteriorating infrastructure would occur.

The Great Smoky Mountains National Park would continue to own the property and buildings on the site, and Tremont would continue to utilize the facilities under the terms and conditions of the Cooperative Agreement (CA). Tremont would continue to be responsible for maintaining the facilities, with the exception of water and wastewater systems (external to buildings), electrical systems, and access roads and other specific items as described in the CA.

Alternative B **- Modification to Existing Facilities (Limited)** includes minor upgrades, modifications, additions, and spatial reconfiguration to existing facilities and infrastructure to optimize functionality and potential utilization.

Alternative D**- Moderate Redevelopment** includes moderate site redevelopment and major modifications, additions, and spatial reconfiguration to the site and existing facilities to increase facility function, utilization, energy conservation, and visual appearance.

Alternative E**- Major Redevelopment** consists of complete site redevelopment, including new and upgraded facilities. All site development, facility design, and construction would become a model of sustainable design principles and development. The site development would become an integral part of the educational opportunities at Tremont.

ENVIRONMENTALLY PREFERRED ALTERNATIVE

As defined by the Council on Environmental Quality (CEQ): "The environmentally Preferred Alternative is the alternative that will promote the national environmental policy as expressed in NEPA's Section 101. Ordinarily, this means the alternative that causes the least damage to the biological and physical environment; it also means the alternative which best protects, preserves, and enhances historic, cultural, and natural resources".

The environmentally Preferred Alternative is the alternative that best:

1. Fulfills the responsibilities of each generation as trustee of the environment for succeeding generations
2. Ensures for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings
3. Attains the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences
4. Preserves important historic, cultural, and natural aspects of our national heritage and maintains, wherever possible, an environment that supports diversity and variety of individual choice
5. Achieves a balance between population and resource use that will permit high standards of living and a wide sharing of life's amenities
6. Enhances the quality of renewable resources and approaches the maximum attainable recycling of depletable resources

The environmentally preferred alternative is the National Park Service preferred alternative, Alternative C. This alternative was selected based on the following criteria:

- Alternative C improves operation efficiency and sustainability by construction and operation of "green" renovations, including a rehabilitated dormitory and activity center. In addition, a new wastewater treatment plant would be constructed that would replace the existing aging system (criteria 1 and 6).
- Alternative C protects public and employee health, safety, and welfare by improving the physical condition inside buildings at Tremont (NEPA criteria 2, 3, and 5); and
- The effects of Alternative C on natural resources (physical disturbance of less than three acres of habitat) are similar to those associated with Alternatives B, D and E (NEPA criteria 1, 2, 3, 4, and 5), while simultaneously achieving the basic goal of incorporating sustainable features (criteria 6).

THE PREFERRED ALTERNATIVE AND SIGNIFICANCE CRITERIA

As defined in 40 CFR §1508.27 from the CEQ's regulations that implement the provisions of NEPA, significance is determined by examining the following criteria:

Impacts that may have both beneficial and adverse aspects and which on balance may be beneficial, but that may still have significant adverse impacts which require analysis in an EIS:

With the improved, more efficient facilities, students and staff will be able to more effectively participate in and implement the educational programs at Tremont.

No major adverse impacts will occur to the park's natural resources, terrestrial and aquatic wildlife, water resources, soils, air quality, noise, and archeological resources as a result of construction of the proposed project. Soils on the site have already been disturbed by the construction of the original Tremont buildings, roads and parking lot construction projects. The majority of improvements would occur inside existing buildings and would have minimal effects on soil. If the option for a new dormitory is selected, the existing building would be removed and the new building would be constructed in the same location, on previously disturbed land. Impacts on soils, water quality and aquatic life would therefore be minimal and temporary. During construction, best management practices will be employed to minimize and reduce these effects.

Previous surveys have shown that there are no archeological resources on the site. However, during construction, a qualified archeologist will monitor the area and construction will be stopped if artifacts are identified. Disturbance to any archeological resources will be mitigated with the proper recovery and cataloging of any artifacts found during construction.

Noise levels will increase temporarily during construction, but will return to previous levels once construction is complete. There will be temporary, negligible impacts to air quality due to the amount of exhaust emitted by the construction equipment. There will be no long term adverse impacts to noise levels or air quality as a result of implementing the Preferred Alternative.

Any negative impacts caused by construction will be temporary and will not cause significant adverse effects in the future.

No significant impacts will occur to the park's museum collection, ethnographic resources, historic structures, meteorology, geology, or threatened/endangered species.

Impacts from the project will not be significant. Furthermore, this project would not have a cumulative effect on the natural, physical or human environment in the vicinity of the proposed project when considered along with other past, present, and reasonably foreseeable future actions in the region. There will be no impairment to park resources associated with the Preferred Alternative.

The degree to which the action affects public health or safety:

The Preferred Alternative would have short-term, minor, adverse effects on public health and safety during construction. During operation, Alternative C would have long-term, minor beneficial effects on public health and safety. The delays to traffic and parking during the construction process will be minimal and will not directly pose a significant impact to the health and safety of visitors. Over the long term, reconfiguration of road and parking lot to provide separation between automobile and pedestrian traffic will improve safety conditions on the campus. The construction of the restrooms on either end of the dormitory (or new interior restrooms if the dormitory is completely replaced) will provide improved user access to the restrooms.

Unique characteristics of the geographic area such as proximity to historic or cultural resources, parklands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas:

The NPS defines five categories of cultural resources: 1) archeological resources; 2) historic structures; 3) cultural landscapes; 4) ethnographic resources; and 5) museum collections. Each of these types of cultural resources was evaluated and no impacts to cultural resources are identified.

There are no prime farmlands, ecological critical areas, or designated natural areas that will be impacted by the Preferred Alternative. Wild and scenic rivers have not been designated within Great Smoky Mountains National Park boundaries; therefore, they are not impacted by this proposed project. However, the Middle Prong of the Little River is a designated Tier III Waters of the State of Tennessee (Outstanding National Resource Waters) and constitutes an outstanding national resource. No degradation is allowed in these waters. Best management practices will be employed as mitigation measures during construction to assure that water quality of the Middle Fork is protected. Installation and operation of a new wastewater treatment plant will eliminate problems with the aging, inefficient existing facility.

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

Implementation of the project will not result in controversial effects on the human environment. The majority of comments received during scoping as well as review of the Environmental Assessment (EA) indicate support of the project and agreement with Tremont's goals and objectives.

Degree to which the possible effects on the quality of the human environment are highly uncertain or involve unique or unknown risks

The project will result in a significant improvement of the quality of the visitor experience at Tremont. There will be short-term, minor, adverse impacts to aesthetics and the visitor experience during construction. There are no identified risks associated with the Preferred Alternative that are unique or unknown. No effects associated with the Preferred Alternative are considered highly uncertain.

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

The Preferred Alternative implements sustainable practices and procedures that are consistent with NPS Management Policies 2006. All NPS projects consider sustainable practices to the extent practicable, and therefore, the Preferred Alternative does not set a precedent, nor does it represent decisions about future considerations. Any future projects will be assessed based upon their own merit.

Whether the action is related to other actions with individually insignificant but cumulatively significant impacts:

Cumulative impacts of the proposed action on natural resources or human environment in the vicinity of the project site will be negligible, because the footprint of the proposed action is small in magnitude in comparison to the extent of natural resources in the area. Construction would be limited primarily to the area of the rehabilitated or restored dormitory, the area for the upgraded stormwater system between the dormitory and the activity center, and the area where the waste water treatment plant would be constructed at the existing treatment ponds. A maximum of ½ acre of naturally vegetated habitat would be affected. Operation of the proposed project under the preferred alternative would involve improvements in stormwater quality and permitted discharges from the new wastewater treatment plant. Changes in air quality; soils; water quality; aquatic resources; vegetation and native plants; special status species; wildlife; ecologically critical areas, wilderness, wild and scenic rivers, or other unique resources will be relatively small when compared with other past, present and reasonably foreseeable future actions.

The proposed action will consume minor amounts of energy (electricity and gas), water, and solid waste during construction and operation in comparison with other projects in the area. The

project will therefore not have significant adverse cumulative effects on energy resources, when considered with other past, present, and reasonably foreseeable future actions in the region.

Construction would be limited to a relatively small part of the Tremont campus and would occur at intervals over an 18 to 24-month period. The project would therefore not have significant adverse cumulative effects on soundscape, when considered along with other past, present, and reasonably foreseeable future actions in the region.

The proposed action will provide increased separation of visitors from vehicles, and will reduce congestion on the campus. These safety improvements effects will be limited to the Tremont campus. The project will have a negligible beneficial cumulative effect on public health and safety, when considered along with other past, present, and reasonably foreseeable future actions in the region.

The proposed action would have net beneficial cumulative effects on visitor use and experience and visual quality/viewshed in the park and surrounding area by providing more efficient infrastructures and services for staff and users of Tremont.

The proposed action would have a net beneficial cumulative effect on public health and safety by reducing traffic congestion on the campus, and by increasing the separation of pedestrian traffic from vehicles on the campus.

The degree to which the action may adversely affect districts, sites, highways, or objects listed or eligible for listing in the National Register of Historic Places, or other significant scientific, cultural, or historic resources:

The EA was written in compliance with Section 106 of the National Historic Preservation Act. No museum objects, historic structures or cultural landscapes will be impacted by the Preferred Alternative.

Previous surveys have shown that there are no archeological resources on the site. However, during construction, a qualified archeologist will monitor the area and construction will be stopped if artifacts are identified. Disturbance to any archeological resources would be mitigated with the proper recovery and cataloging of any artifacts found during construction. The recovery of significant archeological information by means of controlled scientific excavation is appropriate to mitigate the adverse effects of the project on archeological sites and will conform to the Secretary of Interior's Standards and Guidelines for Archeology and Historic Preservation, the Advisory Council on Historic Preservation's Treatment of Archeological Properties; A Handbook and Recommended Approach for Consultation on Recovery of Significant Information form Archeological Sites, and the Department of Interior, National Park Service, and Definition of National Register Boundaries for Archeological Properties, National Register Bulletin, No. 12. All human remains, sacred objects, objects of cultural patrimony, and/or associated funerary objects will be treated according to the statutes set forth in the Native American Graves Protection and Repatriation Act of 1990 (25 U.S.C. 3002; 104 Stat 3048).

The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973:

The Preferred Alternative is not anticipated to impact any threatened or endangered species or critical habitat. In addition, no native species will be extirpated from the park, and no rarity ranked species of G3 or rarer will have a population lost as a result of this project.

Whether the action threatens a violation of federal, state, or local law or requirements imposed for the protection of the environment:

The Preferred Alternative will not violate any federal, state, or local environmental protection laws.

IMPAIRMENT STATEMENT

The NPS has determined that implementation of the Preferred Alternative will not constitute an impairment to the park's resources and values. This conclusion is based on a thorough analysis of the environmental impacts described in the EA, public comments received, relevant scientific studies, and the professional judgment of the decision-maker guided by the direction in NPS *Management Policies 2006*. The Preferred Alternative would not result in significant adverse impacts to resources on the Tremont site or in the park. Overall, the proposed project would result in benefits to park resources and values, as well as for improvements in Tremont staff and visitor experience.

MITIGATION MEASURES FOR THE PREFERRED ALTERNATIVE

To minimize resource impacts, the following mitigation measures were part of the analysis in the EA and will be followed during implementation of the Preferred Alternative. These actions will lessen the potential for adverse effects of the Preferred Alternative, and have proven to be effective in reducing environmental impacts on previous projects.

MITIGATION MEASURES

Impact Topic	Mitigation Measure
Soil and Water Quality	• Construction limits would be delineated by the park prior to any construction activity. Workers would be instructed to avoid conducting activities and disturbing areas beyond the construction limits. • All tools, equipment, barricades, signs, surplus materials, demolition debris, and rubbish would be removed from the project work limits upon project completion. • Contractors would be required to properly maintain construction equipment and generators (e.g., mufflers) to minimize noise from use of the equipment. • All equipment on the project would be maintained in a clean and well-functioning state to avoid or minimize contamination from automotive fluids. All equipment would be checked daily. • Materials would be stored, used, and disposed in a proper manner. • A hazardous spill plan would be approved by the park prior to construction. This plan would state what actions would be taken in the case of a spill, notification measures, and preventive measures to be implemented, such as the placement of vehicles and generators. • Surveys for sensitive native plants would be conducted prior to vegetation disturbance. Non-natives plants would utilize disturbed areas and be controlled. If fill is needed, it would be obtained on-site from depths of greater than 18 inches to minimize the potential for causing spread of non-native plants. • Wait until just before the beginning of construction to clear vegetation and disturb the soil. • Minimize the area of bare soil within the approved work zone as much as possible. • Maintain a buffer of native vegetation around the work area to slow runoff and trap sediments. • Consider phasing construction to minimize the extent of disturbed soil.

MITIGATION MEASURES

Impact Topic	Mitigation Measure
	• Park vehicles and equipment and temporarily store materials on locations that are already devoid of vegetation and/or compacted from previous activities. • If vegetation disturbance cannot be avoided and conditions warrant, reseed the disturbed area with a mixture of park-approved or park-provided seed mix native, self-sustaining native plant species in accordance with known, successful local techniques. • Ensure that the final land form is stable, minimizes soil erosion, and is hydrologically compatible with the surrounding area. • Provide slope and land form stability by reducing slope angles.
Vegetation	• Effects on vegetation would be minimized during the detailed planning phase of the design. • Forested areas would be avoided to the maximum extent practicable by shifting building footprints and other construction footprints to avoid these areas. • Construction would be planned primarily in previously disturbed areas. • Native species would be used in all the plantings. Surveys for non-native species will be conducted on the site. Several non-native species of plants currently occur on the site and could spread during operation of the new facilities. The National Park Service will monitor the site for these species and take appropriate steps to control them as needed.
Special Status Species	• A survey would be conducted to determine the presence of roost trees of the federally endangered Indiana bat on the site. These trees will be avoided if possible; however, if roost trees greater than 6 inches DBH are found that have characteristics for Indiana bat summer roosts (i.e., dead trees with exfoliating bark, tree cavities, and crevices), the following decision process would be employed: • Remove potential roost trees only between October 15 and April 15; or • Have a qualified individual observe for bats existing in the trees for 20 minutes before and after sunset. If bats are observed, use mist netting to determine species or resurvey tree at a later date.
Visitor Use and Experience	• Construction would be planned to minimize potential disruption of visitor use of the Tremont facility by visitors and students. • During construction, contractors would be required to submit and adhere to an approved health and safety plan to minimize health and safety risks during the construction phase. • Phasing of construction would be conducted as part of this program. This will help minimize effects on Tremont staff and users.
Cultural Resources	• Mitigation of potential effects on cultural resources was achieved by conducting an archaeological survey of the project site. The survey was completed by the University of Tennessee Archeological Research Laboratory in 2006 (UTARL 2007). The study "integrated archival research with a field testing program that incorporated shovel testing, hand augering and backhoe testing." The study concluded there were no intact archaeological deposits with the potential for National Register eligibility in the project area, and recommended the "project should proceed as planned, but if unanticipated subsurface features (e.g., privy pits), or burials are encountered during construction,

MITIGATION MEASURES

Impact Topic	Mitigation Measure
	"the project must be halted and the park Archaeologist should be contacted for an evaluation before work resumes

PUBLIC INVOLVEMENT

Both internal and external (public) scoping was conducted to inform various agencies and the public about the proposed improvement project at Tremont. A consultation letter was mailed to local and federal agencies requesting comments regarding the proposed project. A scoping newsletter was mailed to 190 individuals, organizations and stakeholders, and the agencies as notification that an EA was being prepared. The newsletter was also distributed to generate public comments on the proposed action.

The Development Concept Plan/EA (DCP/EA) was made available for public review. A Notice of Availability was placed in the Knoxville News on March 25, 2010 announcing the availability of the Draft DCP/EA for review and comment. Copies of the EA were posted in five area libraries. The EA was also made available on the NPS website. The comment period ended on April 15, 2010. Comments received on the DCP/EA are addressed in an Errata sheet attached to this FONSI.

Errata Sheet on Great Smoky Mountains Institute at Tremont

Development Concept Plan/Environmental Assessment

Comments were received during the public comment period that warrants the preparation and distribution of an errata sheet on the above Environmental Assessment. This sheet will become part of the project file. The comments and responses are as follows:

1) ***Comment***: The pavilion is a facility neglected in most of the Alternatives. It is the largest area at Tremont providing a transition between indoor and outdoor areas.) Its availability is essential when multiple groups are present and there is competition for meeting/teaching/activity space. It was used extensively by CQSM in 2009. I brought in a Rubbermaid storage unit about 4 ft x 2-1/2 ft x 6 ft before camp started to hold supplies (it's a long way to go if you need a paperclip or rubber band or scissors or a screwdriver). The storage unit held supplies for arts and crafts, library books, games, and teaching supplies, so simultaneous activities could be offered to meet the needs and interests of the large camper age span. Also flexibility is needed when the weather is unpredictable.

    a. Response: The pavilion is referenced in Table 4 on page 30 under the description of the Preferred Alternative - Alternative C. The pavilion will be retained under Alternative C and will continue to provide an effective transition between indoor and outdoor areas. While rehabilitation of the pavilion is not included in the preferred alternative, there is nothing that would preclude improvements should funding become available.

2) ***Comment***: My biggest concern is that Tremont may have to shut down while renovation takes place. This is not acceptable to my situation. If Tremont shuts down, it may cause us to go to another center closer to home. Tremont is the best there is. I understand the need to renovate and modernize, but I hope you will be able to keep the program disruption to a minimum.

    a. Response: A minor amount of construction associated with making improvements to existing facilities would be made under Alternative C, which would have some effects on campus activities as a result of traffic congestion when materials and workers are transported. Approximately 30-35 workers would be employed for a period of 18-24 months under Alternative C. The NPS and Tremont will do everything possible to minimize the amount of interference of construction with campus programs and activities during this period. Rehabilitation of the dormitory may result in the facility being closed for overnight use if the work cannot be accomplished without compromising the safety of staff and users of the site or negatively impacting the experience of attending overnight programs at Tremont.

3) ***Comment***: Alternative C, the Preferred Alternative, appears to be a very reasonable level of improvement and modification of the Great Smoky Mountains Institute at Tremont for the groups as defined in the GMP. For this reason, I support implementing this Alternative. However, there are statements and provisions in the subject document that:

    1) Appear to contradict the GMP's stated purpose of this facility.

    2) Are questionable as to what they mean.

    Paragraph 1 on page 5 of Chapter 1 states:

"*Tremont*

The overall purpose of Tremont is to serve as the primary residential environmental education facility for the Great Smoky Mountains National Park. Tremont provides programs that meet goals and principles of environmental education as an extension of the park's Division of Resource Education. Residential environmental education programs have been conducted in the park at Tremont since the mid-1980s. Prior to January 2001, these programs were operated under the auspices of the Great Smoky Mountains Natural History Association."

Following the closure of this facility as a Job Corp facility, it's original purpose, it was operated by Maryville College as an environmental education facility. Due to the high cost of operating this as an environmental education facility, Maryville College discontinued operating it. At that time the Great Smoky Mountains Natural History Association (now named the Great Smoky Mountains Association) took over the operation of it.

In paragraph 1 on page 5 of Chapter 1 there is no stated limitations or restrictions at all on what groups or organizations could use these facilities. The GMP clearly defines the groups that are allowed to use these facilities. On reviewing the document Great Smoky Mountains Institute at Tremont 2010 Course Catalog, it is obvious that there are many very good programs for the groups that meet the criteria for groups that the GMP states this facility is for. However, there are programs for groups that clearly do not meet these criteria, and others that are of questionable value as environmental education programs.

a. Response: The NPS concurs with the history of Tremont operations. The user groups (school groups, teachers, and college students) listed in the 1982 GMP were examples only and not intended to be an all inclusive list. Those groups and individuals who come to Tremont will continue to consist of persons of all ages who come to learn about the cultural and natural resources of the Park.

4) ***Comment***: In Chapter 2, Development of Alternatives, page 17, under Tremont Programs, the following appears:

- The community should be encouraged to take ownership of Tremont, to feel they are an integral part of the facility.
- What "community" is being referred to in this statement? The Tremont facilities as a part of the GRSM are public property, managed by the National Park Service (NPS) and no community can take ownership of them.

a. Response: The term local community is defined as Tremont users, which includes those listed in 3a as well as others groups and organizations (such as Leadership Blount, Experience Your Smokies, etc.) who contribute to and are interested in furthering the protection of Great Smoky Mountains National Park through education and understanding. Tremont programs are managed and implemented under a cooperative agreement with the NPS and are not controlled or owned by any user group.

5) ***Comment***: In Chapter 2, Development of Alternatives, page 18, under Tremont Buildings / Facilities, the following appears:

- A multi-functional room should be provided that is large enough to accommodate both Tremont and community activities.

- In the above statement, what "community activities" are being referred to? The Tremont facility is an Environmental Education facility and activities accommodated at this facility should be limited to environmental education as provided for in the GMP.

    a. **Response**: Activities at Tremont are limited to those described in the cooperative agreement with the NPS, with a primary emphasis on environmental education. Please refer to the response to comment 3a.

6) ***Comment***: In Chapter 2, Development of Alternatives, page 19, paragraph 2 the following appears:

- Provide facilities that are appropriate for a variety of uses.
- Adequate utilities to meet existing and future demands.

Do all of the current "existing uses" comply with the provisions of the GMP relative to environmental education? What "future demands" are anticipated and will they comply with the provision of the GMP relative to environmental education?

a. **Response**: The "variety of uses" refers to the various types of environmental education uses for Tremont facilities. Future demands refer to maximizing the use of the facility as described in Alternative C which, when implemented will allow Tremont to potentially operate at its overnight lodging capacity. The total number of persons that can use the facilities will not increase above 150 per day, however, with the improvements/flexibility being proposed for the dormitory, it is expected that the number of days that the facility will operate at capacity will increase over the years. The use of Tremont for environmental education activities will continue; the NPS does not propose changing the environmental education goals and objectives of Tremont, as stated in Chapters 1 and 2, in the 1982 GMP and the cooperative agreement.

7) ***Comment***: In Chapter 2, Development of Alternatives under Alternative B: Modifications to Existing Facilities (Limited), page 24, paragraph 2, the following appears:

- Providing greater flexibility for serving varied user groups than the No Action Alternative.

Here again the wording "user groups" is used but as noted above, more than once, it has been pointed out that the GMP clearly defines the user groups that this facility is to be operated for. But nowhere in the subject document have I found an equivalent statement.

a. **Response**: Please refer to the response to comment 3a.

8) ***Comment***: On this same page, paragraph 3 the following appears:

- It would not provide an opportunity to enhance abilities to serve the local community and foster partnerships.

What is meant by this statement, particularly the wording "enhance abilities to serve the local community" insofar as environmental education is concerned?

a. **Response**: The intent is that Alternative B had minimal improvements that would not fulfill the directives of Tremont as well as the other action Alternatives, because the improvements would be more limited. The term local community refers to the user groups on the Tremont campus. See also response to comment 3a.

9) ***Comment***: In Chapter 2, Development of Alternatives under Alternative C: Modifications to Existing Facilities (Moderate), page 27, paragraph 2 the following appears:

> The facility would provide greater flexibility for serving varied user groups than the No Action Alternative.
> It would provide a greater opportunity to enhance abilities to serve the local community and foster partnerships as compared with the No Action Alternative.
>
> As noted earlier, the user groups which this facility should serve are clearly stated in the GMP. Regarding the above phrase, "provide a greater opportunity to enhance abilities to serve the local community", what does this mean? As previously noted, this facility is for all of the citizens group as defined in the GMP, and not limited to serving any "local community".

a. **Response**: The term local community refers to the user groups on the Tremont campus. See also response to comment 3a.

10) ***Comment***: Regarding on site housing for the director and staff, I recognize the need for the Director to live on site, but question the need for the staff living there. After all virtually all of the staff of the Great Smoky Mountains National Park live outside the Park. Therefore, it is not unreasonable for the staff of the Great Smoky Mountains Institute at Tremont to live off site. As pointed out on Figure 3, Alternative A, the staff quarters interfere with the natural viewshed next to the river on the south end of the site. I suggest that Alternative C provide for removing the staff quarters unless there is some overriding reason for having the staff living on site.

a. Response: Maintaining staff quarters on the Tremont campus allows the operations to run more safely and efficiently. The majority of Tremont users are school age youth/children who stay overnight, necessitating the presence of knowledgeable contact persons to be readily available after normal business hours to respond to emergencies and maintenance issues.

a) ***Comment***: However, there are some items that I believe need to be changed or included in the Alternative C.

> 1. All the bathrooms in the employee housing should be up graded to current low energy/low flow units.
>
> 2. The new sanitary sewer treatment discharge to the Little River should either be eliminated by use of a drip irrigation system or treated with Bromine gas to eliminate Fecal Coliform and E. coli. This would remove almost any concern about future tightening of limits on discharge as required by the U.S. Government.
>
> The Middle Prong of the Little River is classified as Tier III Waters of Tennessee, "Outstanding National Resource Waters". Presently the Tremont Treatment System meets its National Pollution Discharge Elimination System Permit. However, in my 40 years of working with Discharge Permits they are likely to be tightened in the coming years.

a. Response: Detailed design decisions will be examined in the project implementation phase. The Environmental Assessment presents conceptual designs and concepts only.

Alternative C features a standard aeration package plant that will meet all applicable National Pollution Discharge Elimination System Permit discharge limits.

b) ***Comment***: The provision in the GMP relative to the use of the Great Smoky Mountains Institute at Tremont is found on page 39 of the GMP and is restated here:

"Tremont Environmental Education Center. Operation of the Tremont environmental education center for resident use by school groups, teachers, and college students (emphasis added) will continue. Several structures (dormitories, dining hall) will be replaced with facilities of low environmental impact, the Quonset hut used for research will be removed, and equivalent space for research activities in the park will be provided at Twin Creeks."

The following are our comments:

We agree that the Tremont facilities need improvements and this is provided for in the GMP.

The costly and extensive developments of Alternatives D and E are unacceptable to us. The facilities described in these Alternatives appear to be that of a lodge that provides a low cost vacation in the GRSM for groups with a claimed interest in environmental education, but are not groups as defined in the GMP.

Alternative C, the Preferred Alternative, appears to be a reasonable level of improvement and modification of the Great Smoky Mountains Institute at Tremont for the groups as defined in the GMP. We support implementing this Alternative.

Regarding on site housing for the director and staff, we recognize the need for the Director to live on site, but question the need for the staff living there. After all, virtually all of the staff of the Great Smoky Mountains National Park lives outside the Park. Therefore, it is not unreasonable for the staff of the Great Smoky Mountains Institute at Tremont to live off site. As pointed out on Figure 3, Alternative A, the staff quarters interfere with the natural viewshed next to the river on the south end of the site. We suggest that Alternative C provide for removing the staff quarters, unless there is some overriding reason for having the staff living on site.

a. **Response**: Please refer to the response to comment 10.