

## **1.0 PURPOSE AND NEED FOR THE PLAN**

### **Purpose**

The purpose of this environmental planning initiative is to reevaluate the current management strategy for the Elkmont Historic District (District) as articulated in the Great Smoky Mountains National Park General Management Plan approved and published in 1982 (NPS 1982).

### **Need for Action**

There are 74 buildings, including cabins, outbuildings, a clubhouse (Appalachian Clubhouse) and a hotel (Wonderland Hotel), as well as a number of other structures (bridges and water tanks) in the Elkmont Historic District of Great Smoky Mountains National Park (Park) in Sevier County, Tennessee. Until December 1992, those buildings were under the lease of the Elkmont Preservation Committee (EPC). With the exception of three buildings vacated in 1996 and 2001, all of the buildings in the District have been vacant since 1992. Based upon direction in the 1982 General Management Plan (1982 Plan), the Park had planned to remove all of the buildings once their leases expired, allowing the area to return to a natural state (NPS 1982). The 1982 Plan classifies Elkmont as a developed area and the only other action proposed in addition to removal of the buildings is construction of a picnic shelter. The 1982 Plan states:

Leases for approximately 50 structures occupied by the Elkmont Preservation Committee (cabins and the Wonderland Hotel) will expire in 1992, and four remaining leases will expire in 2001. None of these leases will be extended and the structures are proposed for removal on termination of the leases. Building sites will be returned to a natural state.

However, in 1994 the Elkmont community was listed on the National Register of Historic Places (National Register) as an historic district, with 49 of the 74 structures listed as contributing to the character of the District. As a result of that designation, any subsequent action affecting the District requires consultation with the Tennessee State Historic Preservation Officer (SHPO). Consequently, in 2001 the Park initiated the environmental planning process to reevaluate the strategy provided in the 1982 Plan and to develop a new plan for managing the Elkmont Historic District that takes its listing on the National Register into consideration..

Three different plans for management of the District were proposed by the Park between 1994 and 1999. The original plan provided in the General Management Plan, which called for removal of all of the historic buildings, was objected to by the SHPO. The Park subsequently proposed two additional management plans to the SHPO and the Advisory Council on Historic Preservation. The second plan was objected to by both agencies and the agencies felt that the third plan constituted a new action that would require initiation of a new consultation process.

As a result, the Park initiated the National Environmental Policy Act (NEPA) process. This process is designed to be comprehensive, incorporating public input, National Historic Preservation Act (NHPA) regulations, environmental laws, and other laws, policies and guidelines dealing with cultural and natural resources. The Park initiated this environmental planning process to develop and assess alternatives, and to determine the future management direction for the District.



This document is organized in the following order:

- Chapter 1 provides background on the Elkmont Historic District, the Environmental Impact Statement process and public involvement efforts.
- Chapter 2 provides a complete description of the project alternatives. The specifics of each alternative are presented in their entirety and summarized in tabular format. Summary tables at the end of the chapter are organized to allow comparison between project alternatives.
- Chapter 3 contains information on the affected environment (existing condition) and describes resources that could be affected during project implementation.
- Chapter 4 describes the environmental consequences associated with implementing each alternative.
- A group of appendices follows Chapter 4 and contains information on legislation guiding this planning process, a cultural landscape assessment of the Elkmont Historic District, estimated costs associated with each alternative proposed in this document, visual quality exhibits, research needs and action plans, and a list of consulting parties for the Elkmont project.

### **1.1 Background and Analysis**

The purposes of NEPA are “To declare a national policy which will encourage production and enjoyable harmony between man and his environment, to promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man; to enrich the understanding of ecological systems and natural resources important to the Nation; and to establish a Council on Environmental Quality” (40 CFR 1500.2).

Under NEPA, the current planning process was begun as an Environmental Assessment (EA) and a possible amendment to the General Management Plan. Due to the complex nature of the issues surrounding the District, as well as the level of controversy associated with potential project alternatives, the NPS subsequently elevated the EA process to an Environmental Impact Statement (EIS). The EIS process began in 2003 and has allowed for additional public involvement and more in- depth analysis of the issues. This document is being prepared under NEPA and Council on Environmental Quality guidelines. Because cultural resource issues are related to the core purpose of the project, requirements of the National Historic Preservation Act have been fully considered and integrated into this planning process.

Prior to initiating the formal NEPA process, the Park formed a Consulting Parties group (see Appendix F), as required by the NHPA and “Protection of Historic Properties” (36 CFR Part 800.2 (c)). This group is composed of a diverse group of stakeholders and agencies that provide input on the issues concerning the eventual management of the District. In addition to formal NEPA and NHPA requirements, the Park has established an extensive public involvement process to solicit public input regarding issues that



should be considered as part of the planning process. The intent of the comprehensive public participation incorporated into this planning process and described in this document is to ensure the NPS, as the steward of our national heritage, cultural traditions and community surroundings, fully understands and considers the public's interest. As part of the evaluation process for the District, a variety of natural and cultural resource investigations have been conducted. Using this information, a full range of reasonable management actions was identified and analyzed in concert with the Park's mission and reflective of stakeholder interests as identified during the public involvement process.

Work to evaluate the historic buildings at Elkmont has been on-going since the late 1990s and has continued during the planning process. Due to the deteriorating condition of many of the buildings, emergency stabilization measures have been taken by the Park and because the condition of the buildings is changing over time, a number of assessments of their structural stability have been undertaken. At the request of the Park, the NPS Historic Preservation Training Center (HPTC) completed Historic Structures Assessment Reports for the Appalachian Clubhouse in 1998 and the Wonderland Hotel in 2001. The 2001 assessment for the hotel included only an exterior existing condition assessment and stabilization plan. The 2001 report did not investigate interior conditions and did not include an engineering analysis. The assessment team stated that, by employing stabilization methods outlined in the report, that the hotel could possibly still be stabilized, but that this must occur within two years. The Park employed many of the stabilization techniques prescribed in the report, but as Park preservation crew members were repairing the roof, it was discovered that there was more extensive structural damage and failure than was previously detected. In the winter of 2002, it became apparent that another assessment of the hotel would be necessary.

In April 2003, another assessment of the Wonderland Hotel was completed by the HPTC. The assessment indicated that surface materials (carpeting, drywall and dropped ceilings) covering the structure had prohibited a complete investigation from being performed in 2001. The report further concluded that the interior structure in many areas had most likely already failed when the 2001 report was completed and that the overall structural stability of the Wonderland Hotel in 2003 was "serious" and should be classified as "failed". In August 2005, the majority of the hotel building collapsed due to the failed structural system.

## **1.2 Overview**

The Department of the Interior (Department), under which the NPS functions, is the nation's primary conservation agency and acts as a steward for most of our nationally-owned public lands and natural resources. The mission of the Department includes *"fostering sound use of our land and water resources; protecting our fish, wildlife and biological diversity; preserving the environmental and cultural values of our national parks and historic places; and providing for the enjoyment of life through outdoor recreation"* (NPS 2004a). The Department holds the responsibility of assessing resources and strives to ensure that their use and/or development are in the best interest of all citizens by encouraging stewardship and public participation in their care.



In order to achieve the objectives of the National Park Service mission, each National Park is required to develop a General Management Plan to provide guidance in making decisions concerning management of its resources. The plans are designed to be used for 15 to 20 years. Although much of the 1982 Plan for Great Smoky Mountains National Park is still useful, issues concerning the Elkmont Historic District could not be addressed properly without additional investigations, due to the subsequent listing of the District on the National Register. As its primary purpose, this document proposes and assesses a full range of alternatives that recognize this change so that a management plan for the District can be determined and implemented. Chapter 4 describes the varying degrees and different ways that individual resources would be impacted depending on the specific alternative proposal. The goal of this Environmental Impact Statement is to provide guidance to aid in discerning the best balance between resource impacts and achieving the goals and objectives for the District.

#### **1.2.1 Location and Brief Description**

Great Smoky Mountains National Park is located in east Tennessee and southwestern North Carolina in the southern portion of the Appalachian mountain range (Figure 1- 1, p.5). The Park contains almost equal parts in Tennessee and North Carolina, with the northern half in Blount, Sevier, and Cocke counties, Tennessee and the southern half in Swain and Haywood counties, North Carolina (NPS 1982).

The Park area has been occupied by humans for at least the past 10,000 years (Bass 1975; Webb 2002). Although it is difficult, if not impossible, to assign tribal affiliations to the earlier prehistoric American Indian occupants, by at least the fifteenth to sixteenth century the area was occupied by Iroquois- speaking Cherokee populations. No major Cherokee towns are known to have been located within the Park; however, sizeable settlements were present along many of the surrounding drainages. The Cherokee towns along the Little Tennessee and adjacent rivers in what is now East Tennessee were known as the Overhill Towns, while the Out Towns were situated in the Tuskegee drainage on the North Carolina side of the Park (Greene 1996; Schroedl 2000; Smith 1979).

The first European explorers entered the area in the mid- 1500s, but probably crossed the Appalachians to the north of the Park (Hudson 1990, 1997). Sustained European contacts with the Cherokees did not begin until after the settlement of Charleston (South Carolina) in 1670, but by the mid- 1700s the increasing European settlement pressure and accompanying spread of introduced diseases had caused major disruptions to the Cherokee populations. A series of land cessions throughout the late 1700s and early 1800s culminated in the 1835 Treaty of New Echota and resulted in the loss of most Cherokee lands in the east, although a number of Cherokees remained in the area. The Cherokees that continued to live in the area formed the nucleus of what is now the Eastern Band of Cherokee Indians (Finger 1984; Royce 1884).

The earliest European settlement of the immediate Park vicinity occurred during the late 1700s (Lambert 1958a; Pace 2001; Webb 2004), although the more mountainous interior of the region was settled later. However, some areas were not occupied until well into the nineteenth century. The early European inhabitants were primarily small farmers,



many of whom supplemented their incomes by raising and selling livestock and through small- scale mercantile establishments. The more fortunate settlers farmed the richer and more easily cultivated soils found on the floodplains and in the larger coves, and raised crops such as corn, wheat, rye, and oats. Cattle and hogs were also raised and for many years were given free rein. Much of the corn was ground into meal for human consumption, and the remainder used as fodder for the cattle, hogs, and work animals.

Small- scale logging took place in many parts of the Smoky Mountains during the late 1800s, but sizeable operations did not occur until the advent of mechanized, railroad logging in the early 1900s. Several large logging companies operated in the region during the 1910s and 1920s, including the Little River Lumber Company in the Elkmont area. Many of these companies ceased operations in the area by the late 1920s, although a few (including the Little River Lumber Company) continued operations into the 1930s (Lambert 1958b, 1961; Weals 1993).

The idea for a National Park in the southern Appalachians had originated in the late 1800s (Taylor 2001), but gained momentum in the early 1920s with the recognition by preservationists of the environmental degradation caused by large- scale logging and recognition by businessman and government officials of the economic potential of such a park (Pierce 2000; Taylor 2001). Congress passed the Swanson- McKellar Bill in 1925 authorizing investigation and determination of Park boundaries, and for State Commissions to begin collecting donations to purchase land for a National Park in the Smoky Mountains. In the spring of 1926, legislation was passed in Congress and signed by President Calvin Coolidge providing for the establishment of Great Smoky Mountains National Park, and the Tennessee and North Carolina Parks Commissions began acquiring land throughout the area. The NPS began administration of an initial 150,000 acres within the Park in 1930, and the Park was officially established in 1934 (Pierce 2000).

#### 1.2.1.1 The Park

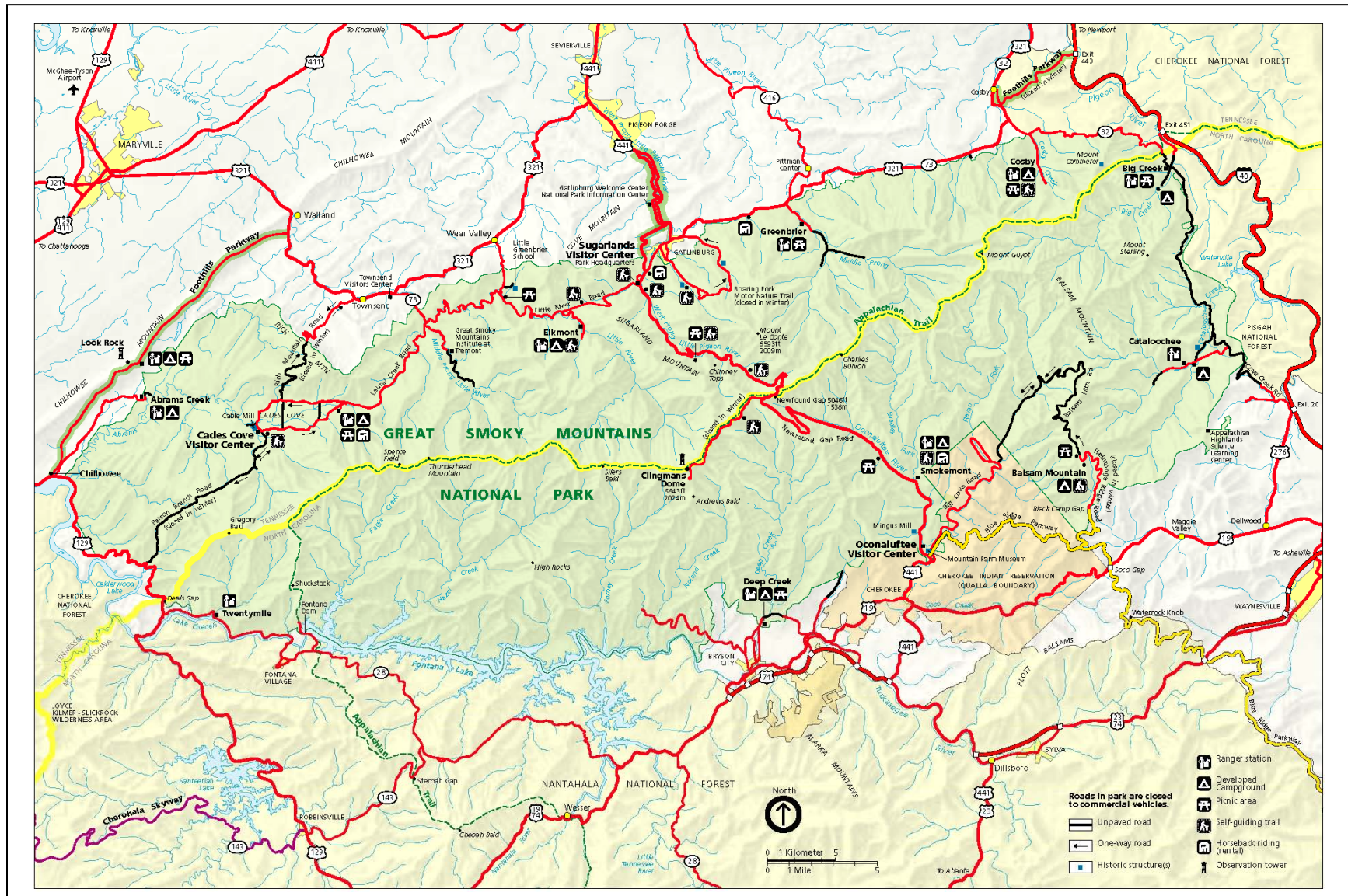
The landscape in Great Smoky Mountains National Park is mountainous with the highest peak, Clingmans Dome, reaching 6,643 feet and the lowest elevation at 840 feet (APN 2004). Its natural environment includes one of the most diverse arrays of plant and animal species in the country. It is one of only nine National Park units designated as both an International Biosphere Reserve (1976) and a World Heritage Site (1983). Biosphere Reserves are areas of terrestrial and coastal ecosystems that are internationally recognized within the framework of UNESCO's Man and Biosphere Program. Sites on the World Heritage list are cultural and/or natural properties recognized by the World Heritage Committee as being of outstanding universal value. These dual designations recognize the abundance and diversity of the plant communities and complex geology protected within the Park.

There are two educational facilities in the Park, including the Great Smoky Mountains Institute at Tremont on the Tennessee side of the Park and the Appalachian Highlands Science Learning Center at Purchase Knob on the North Carolina side along the southeastern border of the Park.





Figure I- 1: Great Smoky Mountains National Park



Great Smoky Mountains National Park  
 Elkmont Historic District  
 Draft EIS/GMPA



One very important study being conducted at Great Smoky Mountains National Park is the All Taxa Biodiversity Inventory. The purpose of this inventory, which began in 1997, is to identify all the species within the Park. The inventory is expected to be used as a model for other reserves. As a result of this investigation, as of 2004, 3,358 new records of species occurrence had been documented and 543 species new to science had been discovered (DLA 2004).

The Park covers 521,495 acres, received over nine million recreation visits in 2003, and had an annual budget of \$16,600,000 for the 2004 fiscal year (NPS 2005). Three visitor centers are located in the Park at Sugarlands, Cades Cove and Oconaluftee. Information about the Park is provided through use of displays, videos, books, guides, a web site and maps. In addition, rangers and volunteers are available to help visitors get the most from their time in the Park. There are seven ranger stations in the Park located at Abrams Creek, Cades Cove, Elkmont, Smokemont, Deep Creek, Big Creek and Cataloochee. The main road through the Park, Newfound Gap Road (U.S. 441), is a well-known scenic drive that provides views of wildflowers, flowering trees, changing fall leaf colors, mountains and historic buildings. Other Park roads also allow drivers to observe the Park's natural and cultural resources and provide connections to trails and paths.

The Park contains the following six historic districts either on or nominated for the National Register:

- Roaring Fork
- Cades Cove
- Bud Ogle Farm
- Oconaluftee Archeological District
- Elkmont
- Cataloochee (nominated)

In addition, there are numerous historic buildings, some of which are listed on the National Register\*. These include:

- Mayna Treanor Avent Studio
- Hall Cabin
- Alex Cole Cabin
- Little Greenbrier School/Church
- King- Walker Place
- Messer Barn
- John Ownby Cabin
- Oconaluftee (Smokemont) Baptist Church
- Mingus Mill (nominated)
- Tyson McCarter Place
- Jim Hannah Cabin (nominated)
- Little Cataloochee Baptist Church (nominated)

\*The National Register list can be accessed at the NPS website <http://www.cr.nps.gov/nr/> and also at private websites such as <http://www.nationalregisterofhistoricplaces.com>.



The Appalachian National Scenic Trail traverses the Park for approximately 70 miles, primarily along the ridge that constitutes the border between Tennessee and North Carolina. Horseback riding, bicycling and backcountry hiking are some of the activities enjoyed by Park visitors (NPS 2003a). Over 800 miles of trails are available to visitors on horseback or walking, as well as 1,108 campsites, 1,008 of which are developed. Approximately 1,600 species of flowering plants, including over 100 species of native trees; 200 species of birds; approximately 80 species of fish; 60 species of mammals; and 31 species of salamanders are found in the Park (Nichols Pers. comm. 2004).

#### 1.2.1.2 The Site

The Elkmont Historic District (Figure 1- 2) is located in Great Smoky Mountains National Park along the Little River in Sevier County, Tennessee. It is approximately 6 miles from the Sugarlands Visitor Center, which is 2 miles from the City of Gatlinburg, one of the Park's gateway communities. A complete discussion of the site history, from the time of prehistoric occupation up to present day conditions is provided in Section 3.1.

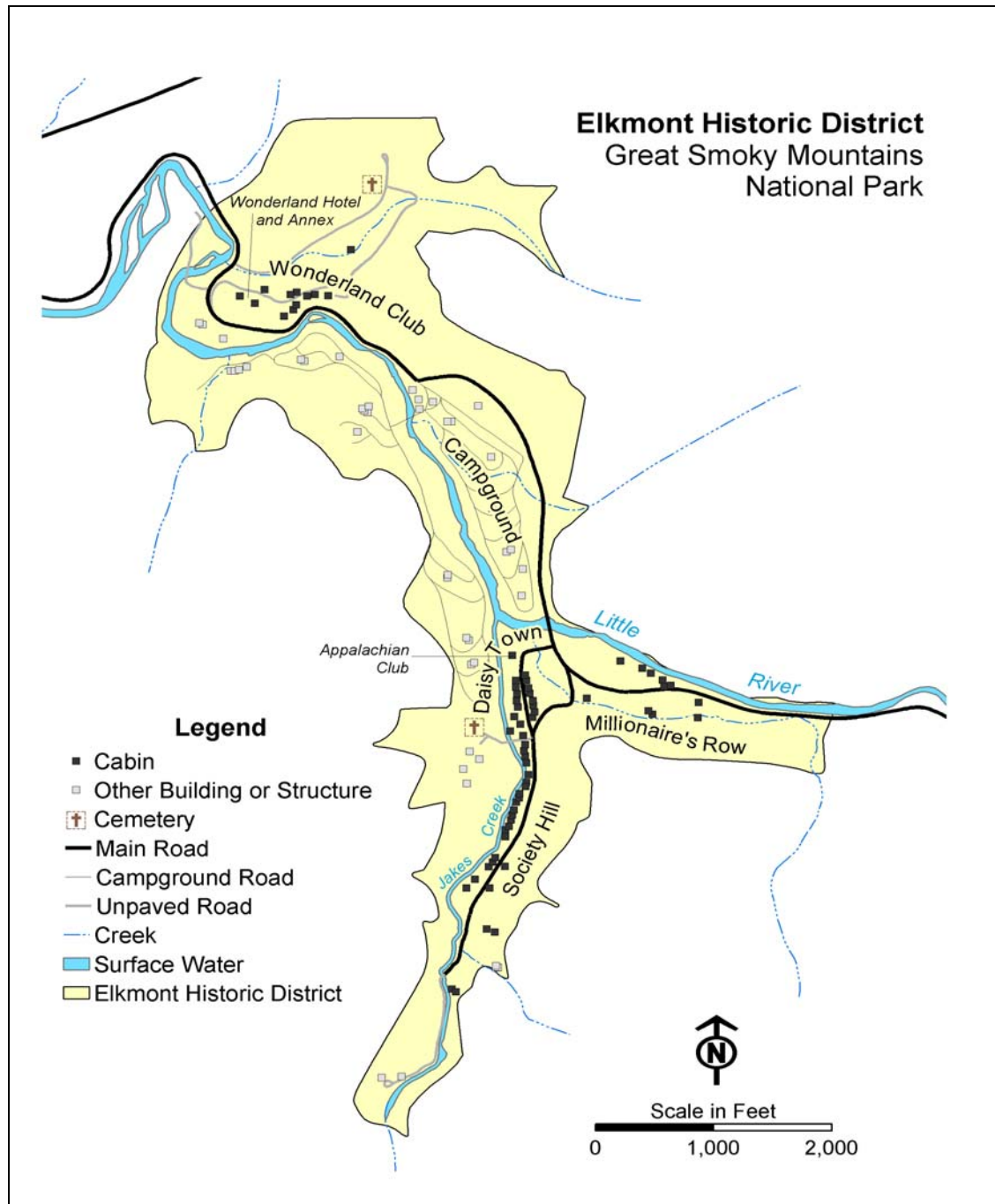
The Little River Lumber Company was founded in 1900 to log the Little River drainage, and by 1903, the company had constructed a large sawmill at Townsend, in Tuckaleechee Cove southwest of Elkmont. By 1908, the company had extended a railroad line through the Little River's narrow East Prong gorge to property it purchased at Elkmont. The community of Elkmont soon developed as an "important facility for both railroad and lumbering operations" (Schmidt and Hooks 1994), as it constituted the point at which logs were transferred from the geared engines used in steep topography to the rod engines used on the flatter run between Elkmont and Townsend (Schmidt and Hooks 1994). Although the railroad was built to transport timber, the railroad company began promoting its use by encouraging recreationists to come to the mountains. Hunting and fishing were two of the most popular activities, as the area provided an ample supply of trout, bear, deer and small game animals.

The Little River Lumber Company promoted development of the cutover land and, in 1910, deeded approximately 50 acres along Jakes Creek, just upstream from the community of Elkmont, to the Appalachian Club, chartered as a sportsman's club. The lumber company retained timber and mineral rights, while the Appalachian Club constructed a clubhouse at its own expense. The club's membership consisted primarily of sportsmen from Knoxville's business community, but later on it became increasingly centered on social activities. Eventually, prominent citizens primarily from Knoxville, Maryville and Chattanooga became club members. Some of the members began to build cottages near the Clubhouse.

The Town of Elkmont included homes inhabited by lumbermen and their families. It also included a general store, post office, boarding house, church and theater. In ca. 1911, the Wonderland Park Company, created by C.B. Carter and his two brothers, purchased a 65- acre piece of land north of the Town of Elkmont. The following year, the Carters constructed the Wonderland Park Hotel. In 1915, after the sale of the hotel and adjacent land and buildings to a group of Knoxville citizens, a new private club was formed called the Wonderland Club. Initially, the club was open only to its members, who used the area for recreational pursuits including hunting, fishing, and hiking on nearby trails.



Figure I- 2: Elkmont Historic District



Built in 1912 as an exclusive membership club, the Wonderland Club eventually opened its hotel to the public several years later. Conflicts between residents of the Elkmont area developed at the time that the NPS was considering establishment of a new national park. These conflicts arose between those who wanted the area to be managed as a national forest and those who wanted the land preserved as a national park. Eventually, the national park proposal prevailed (Thomason et al. 1993; Cleveland 2004).

During the 1920s and 1930s, when the states of North Carolina and Tennessee began acquiring land for the Park, residents of these lands, including those in Elkmont, were offered the option of selling their properties outright or accepting a lesser payment in conjunction with a lifetime lease to the property. Acquisition of this property is described in more detail in Section 1.2.4. From 1972 until December 1992, the remaining buildings in Elkmont were under the lease of the Elkmont Preservation Committee (EPC). With the exception of three buildings vacated in 1996 and 2001, all of the buildings in the District have been vacant since 1992. Based upon direction in the 1982 General Management Plan (1982 Plan), the Park had planned to remove all of the buildings once their leases expired, allowing the area to return to a natural state (NPS 1982). However, prior to implementation of this plan, the Elkmont Historic District was nominated to the National Register of Historic Places.

The National Register nomination for the Elkmont Historic District was prepared during the spring and summer of 1993 and was based on survey work undertaken in 1992 and early 1993 (Thomason et al. 1993). The District was recommended as significant under National Register of Historic Place's Criteria A (event) and C (design/construction). These criteria are described further in Section 1.3.1. Finalizing the nomination involved intensive consultation and negotiation between the Park, the Southeast Regional Office of the NPS, and the Tennessee SHPO to arrive at consensus. During the consultation period, the various buildings, structures, and aboveground sites within the District were determined by the agencies to either be contributing or non-contributing components to the District's significance.

In 1994, following determination of the status of the buildings and structures, the District was listed on the National Register, with 49 of the 74 buildings determined to be contributing to the District's significance. In general, the boundary of the District follows the 2,400- foot contour line, but also utilizes streams, roads and trails and follows the 2,200- foot contour line along the western border. The boundary was drawn to include the area of the former Town of Elkmont that is now occupied by the campground. It also includes land that surrounds extant buildings, structures and features, and the area where buildings and structures were formerly located (Thomason et al. 1993; Cleveland 2004).

Most of the structures are situated on alluvial (or colluvial) flats and benches along the confluence of Little River and Jakes Creek. The Little River is a pristine waterway and is classified as an "Outstanding National Resource Water" (ONRW). Its ONRW status provides legal protection against degradation of its water quality. In addition, a preliminary survey of the area revealed several natural plant communities, including a community type commonly referred to as "montane alluvial forest." Natural communities are described and ranked for rarity in The Nature Conservancy's National Vegetation Classification System. The montane alluvial forest at Elkmont is classified as a very rare, globally imperiled community. These aspects of the District environment and other features are discussed in detail in Chapter 3.

### 1.2.2 Enabling Legislation

This planning process was undertaken in compliance with environmental legislation enacted by the U.S. Congress and under directives issued by the NPS. Applicable legislation is listed below.

- Organic Act of 1916 (16 USC 1 43 and USC 1 et. seq. 1926)
- 1926 and 1934 Enabling Legislation
- National Environmental Policy Act (NEPA) (40 CFR 1500- 1508) (1969)
- National Historic Preservation Act of 1966 (NHPA), as amended (16 USC 470 et. seq.)
- Regulations of the Council on Environmental Quality (CEQ)
- NPS Director's Orders

#### 1.2.2.1 Organic Act of 1916 (16 USC 1 43 and USC 1 et. seq. 1926)

The legislation that provided for establishment of the Park emphasizes the obligation to ensure that administrative, resource protection and development actions in the Park are consistent with provisions in the 1916 Organic Act, which created the NPS. The act describes the primary mission of national parks, monuments and reservations as follows:

[The National Park Service] shall promote and regulate the use of the federal areas known as national parks, monuments and reservations hereinafter specified....by such means and measures as conform to the fundamental purpose of the said parks, monuments and reservations, which purpose is to conserve the scenery and the natural and historic objects and the wildlife therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations (16 USC 1).

Thus, the Organic Act established the fundamental purpose of all national parks as conservation of park resources and values. However, the law also provides Park managers with some discretion and the NPS' *Management Policies* (NPS 2000) "allow impacts to Park resources and values when necessary and appropriate to fulfill the purposes of a park, so long as the impact does not constitute impairment of the affected resources and values".

NPS management goals and objectives are guided by standards outlined in the 2001 edition of NPS *Management Policies* and were created for the purpose of providing direction for the establishment and administration of the national park system. The policies were developed with input from National Park Service staff and other individuals and organizations that are concerned with the well- being of the parks and the programs provided by them. As stated above, the overriding goal of the *Management Policies* is to thoughtfully carry out the NPS mission (NPS 2000).

#### 1.2.2.2 1926 Enabling Legislation

16 USC 403 created the Park as recommended by the Secretary of the Interior's April 14, 1926 report. Acquisition of park land was funded by public and private donations



without expenditure of federal appropriations. The 1926 Enabling Legislation for establishment of the Park provides a simple statement that the land is set aside for a public park for the “benefit and enjoyment of the people.” The purpose of the Park was previously defined by the 1924 Southern Appalachian National Park Commission Report, which set the stage for the enabling legislation and provided six criteria for a park to be located in southern Appalachia, as follows:

1. mountain scenery with inspiring perspectives and delightful details
2. areas sufficiently extensive and adaptable so that, annually, millions of visitors might enjoy the benefits of outdoor life and communion with nature without the confusion of overcrowding
3. a substantial part to contain forests, shrubs, and flowers, and mountain streams, with picturesque cascades and waterfalls overhung with foliage, all untouched by human hands
4. abundant springs and streams available for camps and fishing
5. opportunities for protecting and developing the wildlife of the area, and the whole to be a natural museum, preserving outstanding features of the southern Appalachians as they appeared in the early pioneer days
6. accessibility by rail and road

#### 1.2.2.3 National Environmental Policy Act (NEPA)

The National Environmental Policy Act of 1969 was one of the first laws ever written to establish a broad national framework for protecting the environment. NEPA’s overall goal is to ensure that the federal government gives proper consideration to environmental, as well as economic and technical factors, prior to undertaking any major federal action that could significantly affect the environment.

Environmental Assessments (EAs) and Environmental Impact Statements (EISs) are required documents that assess the likelihood of impacts from alternative courses of action (USEPA 2003). NEPA directs all federal agencies to utilize a systematic, interdisciplinary approach that employs natural and social sciences and the environmental design art in planning and decision- making that may have an impact on the human and natural environment. Environmental impacts analyzed should include potential direct, indirect and cumulative effects that could result from implementation of proposed project alternatives. The report should contain a detailed statement by the responsible official that includes:

- The environmental impact of the proposed action
- Any unavoidable adverse environmental effects should the proposal be implemented
- Alternatives to the proposed action



- The relationship between local short- term uses of the human environment and the maintenance and enhancement of long- term productivity
- Any irreversible and irretrievable commitments of resources that would be involved in the proposed action should it be implemented.

#### 1.2.2.4 National Historic Preservation Act of 1966, as amended (NHPA)

##### Sections 106 and 110 of the NHPA

Section 106 of the NHPA requires federal agencies to review all actions (undertakings) that may affect a property listed or eligible for listing on the National Register and provide the Advisory Council on Historic Preservation a reasonable opportunity to comment on such actions. An undertaking can be direct, such as the construction of a new facility by the federal agency, or indirect, such as authorization provided to others by permits or other actions. 36 CFR 800 spells out the implementation process that federal agencies are to follow.

The National Register is maintained by the NPS and includes buildings, structures, objects, sites, districts and archeological resources. The Elkmont Historic District is listed on the National Register because of its state and local significance. To be considered potentially eligible for listing, a resource is often at least 50 years old. Section 106 and 110 also require that federal agencies enter into a scoping and consultation process. It specifically requires consultation with the SHPO, applicable Tribal Historic Preservation Officers (THPO), and other interested parties (Consulting Parties), including the general public, in the early stages of project planning (ACHP 1999a, 1999b, 1999c, 1999d and 1999e).

The goal of the consultation process is to identify historic properties, to assess project effects, and to seek ways to avoid, minimize or mitigate any adverse effects on the historic properties. Historic properties include a variety of significant cultural resources including archeological sites, buildings and structures, and traditional cultural properties. Under certain circumstances, the Advisory Council on Historic Preservation may enter into the consultation process.

Section 110 of the NHPA charges each federal agency with the positive responsibility for considering projects and programs that further the purposes of the NHPA, and it states that the costs of preservation activities are eligible for federal funding in all actions carried out or assisted by a federal agency. The 1992 amendments to the Act further strengthened the provisions of Section 110. Under the law, the head of each federal agency must assume responsibility for preservation of historic properties owned or controlled by the agency and ensure that the agency:

- establishes a preservation program for the identification, evaluation, nomination to the National Register, and protection of historic properties;
- consults with the Secretary of the Interior, acting through the Director of the NPS, in establishing its preservation programs;
- uses historic properties available to it in carrying out its responsibilities to the maximum extent feasible (FAPAP 1998).



#### 1.2.2.5 Regulations of the Council on Environmental Quality (CEQ)

In 1978, the Council on Environmental Quality (CEQ) issued *Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act* (40 CFR §§ 1500 - 1508). These regulations are designed to assist federal agencies in effectively implementing environmental policy and "action forcing" provisions of the National Environmental Policy Act (NEPA).

#### 1.2.2.6 NPS Director's Orders

NPS Director's Orders and 2001 *Management Policies* (NPS 2000) provide guidance regarding park and conservation planning, environmental impact analysis, decision-making and cultural resource management. NPS Director's Orders that have been consulted in this planning effort include:

- #2: *Park Planning*
- #6: *Interpretation and Education*
- #12: *Conservation Planning, Environmental Impact Analysis, and Decision- Making*
- #28: *Cultural Resource Management*
- #28B: *Archeology*
- #28C: *Draft Handbook for Oral History in the National Park Service*
- #42: *Accessibility for Visitors with Disabilities in National Park Service Programs and Services*
- #48: *Commercial Services*
- #77: *Natural Resource Management*
- #77- 1: *Wetland Protection*
- #77- 2: *Floodplain Management*
- #83: *Public Health*
- #87A: *Park Roads Standards*

A summary of the purpose and intent of each NPS Director's Order is provided in Appendix A.

#### 1.2.3 Substituting NEPA for Section 106 Review

NHPA regulations allow an agency to use the NEPA process and the documents it produces to comply with Section 106 in lieu of the procedures set forth in Sections 800.3 through 800.6 (36 CFR 800). This method allows the process to be streamlined in terms of its overall environmental/historic preservation review process. To use this provision, the following criteria must be met:

1. The agency must notify the SHPO/THPO and the Advisory Council on Historic Preservation that it intends to substitute NEPA documentation for NHPA documents.
2. The agency must identify consulting parties - - such as Indian tribes and Native Hawaiian groups, local governments, preservation organizations - - in a manner consistent with Section 800.3(f).
3. The agency must identify historic properties and assess effects on them in a manner consistent with Sec. 800.4 through 800.5, but the scope and timing of identification



- and effect determination may be "phased to reflect the Agency Official's consideration of project alternatives in the NEPA process" and the effort the agency expends must be "commensurate with the assessment of other environmental factors."
4. The agency must consult about the action's effects with the SHPO/THPO, tribes, Native Hawaiian groups, and other consulting parties during NEPA scoping, analysis, and documentation, and it must involve the public in accordance with the agency's NEPA procedures.
  5. The agency must develop alternatives and mitigation measures in consultation with the other stakeholders, and describe these measures in its EA or Draft EIS.

Subsection 800.8(c)(2) of the NHPA also requires that the EIS be reviewed by the SHPO, THPO and other Consulting Parties, and Section 106 review was conducted during preparation of this document. Scoping, identification and assessment of effects on all resources, including cultural resources, has been undertaken as part of the analysis leading to the Draft EIS, with the results presented in this document. Consultation to resolve potential adverse effects is coordinated with public and agency comment on the Draft EIS and the results will be reported in the Final EIS. Subsection 800.8(c)(4) requires that the measures an agency will take to mitigate adverse effects on historic properties be specified in a Record of Decision that is written following the Final EIS. In addition, if a Memorandum of Agreement (MOA) between the Park and another agency is developed under Section 106, this MOA and final comments from the Advisory Council on Historic Preservation will be addressed in the Record of Decision. Unless there is some compelling reason to do otherwise, the Section 106 MOA will be fully executed before the Record of Decision is issued, and this record will provide for implementation of the MOA's terms.

#### **1.2.4 Leases and Other Agreements**

During the 1920s and 1930s, when the states of North Carolina and Tennessee began acquiring land for the Park, residents of these lands, including those in Elkmont, were offered the option of selling their properties outright or accepting a lesser payment in conjunction with a lifetime lease to the property. This lifetime lease option was not available until 1932, after many former residents had already sold their property to the Tennessee Park Commission.

By 1950, a desire to bring electric service to the remaining Elkmont lessees was hindered by the impending expiration of leases, so an agreement was negotiated in 1952 with the Secretary of the Interior under which lifetime leases were exchanged for a common expiration in 1972. The fixed leases gave the power company a 20- year amortization period with a stable customer pool, and electricity was provided to Elkmont. In 1972, the Elkmont Preservation Committee (EPC) was formed for the purpose of negotiating with the federal government for an extension of the leases. The EPC was successful in obtaining a 20- year extension of the leases to 1992.

In 1992, EPC attempted to secure another lease extension, but was unsuccessful. As a result, on December 31, 1992, when EPC's lease for use of the hotel and all but three of the cabins expired, the occupants were required to vacate the buildings. The remaining three cabins were not included under the EPC lease, but were occupied under individual leases, which expired upon either the lessee's death or on December 31, 2001.

In 2001, a new planning process was initiated and information gathered was documented as part of the preparation for an EA. Due to the complex nature of the issues within the District and the level of controversy surrounding potential project alternatives, the NPS elevated the EA process to an EIS process in 2003 to allow for further investigation of these issues. Through this EIS planning process, a decision will be made regarding how to manage the District. The majority of the buildings have been unoccupied for over 10 years. The Park is required to maintain buildings until a decision is made.

### **1.3 Consultation with State and Federal Historic Preservation Agencies**

NPS has proposed three plans for management of the District. They were:

#### **Plan #1**

In September 1994, the Park notified the Tennessee Historical Commission, the office of the SHPO in Tennessee, of its intent to remove all of the buildings in the enclave and outlined plans to perform the mitigation actions required by the NHPA for removal of historic buildings. The SHPO objected to this plan due to the 1994 listing of many of the buildings on the National Register of Historic Places. The SHPO indicated that some buildings should be retained for use as interpretive displays to educate the public regarding the history of Elkmont.

#### **Plan #2**

In October 1996, the Park proposed a compromise calling for preservation of three buildings to be used to interpret the history of the District and removal of all other buildings. The SHPO also objected to this proposal, suggesting that the Park submit a three- party draft agreement (i.e. NPS/SHPO/Advisory Council on Historic Preservation) describing its preferred action of retaining three buildings and proposed mitigation for removal of the other buildings. The Park submitted a draft agreement in March 1997, but again the SHPO objected to this agreement because they did not feel that the proposed plan would address the need for adequate interpretive materials to educate the public about Elkmont's history and subsequently ended consultation with the NPS.

#### **Plan #3**

In 1998- 99, the Park, along with officials from NPS' Washington and Southeast Region offices, developed a second compromise that proposed preservation of 17 cabins and the Appalachian Clubhouse. At the same time, the NPS allocated a total of \$160,000 to the Park over FY 98- 99 to be used to stabilize the Clubhouse and the 17 cabins. This proposal was sent to the Advisory Council on Historic Preservation and the SHPO in October 1999. The Advisory Council responded that the NPS proposal constituted a new action and required new consultation. The new action also initiated the NEPA process.





### 1.3.1 Historical Significance of the Site

The Elkmont Historic District was listed on the National Register of Historic Places on March 22, 1994, and contains two hotel buildings, a social clubhouse, and more than 70 dwellings and outbuildings (Thomason et al. 1993). Most of the resort community elements were developed between 1910 and 1925 during the height of lumbering operations in the town of Elkmont. The cabins along Little River in the Appalachian Club and three cabins in the Wonderland Club are the only buildings in the district that were constructed after the lumbering activities based out of Elkmont concluded and the railroad tracks were removed.

The first club that formed at Elkmont was the Appalachian Club (Figure 1- 2). This club was started by a group of Knoxville- based businessmen and sportsmen who purchased approximately 50 acres of land from the lumber company in 1910 located along the Little River and Jakes Creek. Today, this area includes the Appalachian Clubhouse and 60 cabins and outbuildings. For planning purposes, three areas within the Appalachian Club have been identified. These areas are referred to in this document as Daisy Town (the area closest to the Clubhouse), Society Hill (further south and along Jakes Creek), and Millionaire's Row (the area along the Little River trail located between the river and Bearwallow Branch). The original Appalachian Clubhouse was destroyed by fire in 1932 and was rebuilt in 1934 based on a design by Knoxville architect Albert Bauman, Jr. Exterior dormer windows have been removed and a newer metal roof has been added. Otherwise, it has been modified very little since that time.

In Daisy Town, there are 22 buildings, 16 of which are contributing resources. Three of these are built around "set- off" houses, referring to their origin as railroad worker's houses that were literally "set- off" from the railroad flat cars in the Elkmont logging village. Another unusual building is "Adamless Eden," a log playhouse for children dating to 1921. Levi Trentham was a long- time resident of the Elkmont area who sold land to the Little River Lumber Company. His log cabin was moved from what is now the campground to Daisy Town shortly after his death in 1932.

Cabins in the Society Hill area along Jakes Creek were built between 1910 and 1925. Of the 28 buildings, 18 are considered contributing resources. The Byers/Chapman cabin was given to Colonel David Chapman by the Tennessee Park Commission as an award for his central role in the establishment of the Park. Millionaire's Row, circa 1928 to 1940, was the last major area of construction. Residences there were built after the railroad left in 1926. The residences in Millionaire's Row are larger than most of the cabins in the Appalachian Club and several of them had car garages. Millionaire's Row has eight cabins, six of which are considered contributing resources. These include the Murphy cabin, which was associated with Joseph Murphy, the Superintendent of the Little River Railroad. One structure, the Miller cabin, was originally built as a horse stable, but was remodeled in 1950 to accommodate living quarters in the upstairs loft.

In ca. 1911, another group of businessmen bought land for the Wonderland Club. The Wonderland Club area is approximately one mile north of the Appalachian Club, east of the Little River and south of its confluence with Catron Branch. There are ten remaining cabins, the Wonderland Hotel, the Annex, and one woodshed remaining in the

Wonderland Club. The hotel was built in 1912 and, in 1928, a side extension and large rear wing were added. The Annex was built adjacent to the Wonderland Hotel in 1920. Both buildings are typical of the resort hotels built in this era in the southern Appalachians. Of the ten cabins in the Wonderland Club, six are contributing resources.

As noted above, the District was placed on the National Register because it represents, at the state level of significance, the only remaining collection of early 20<sup>th</sup> century resort cabins retaining integrity in the Appalachian Mountains of Tennessee. The period of historical significance is 1908 to 1940. These dates span from the beginning of recreation excursions to Elkmont to the date that the last resort cabin was built. Logging operations at Elkmont ended in 1925 and the automobile was becoming a popular mode of transportation towards the end of this period of historical significance.

According to the Tennessee Historical Commission, general criteria for evaluating significance (November 3, 1989) are buildings and man-made site features over 50 years of age that:

- A. are associated with events that have made a significant contribution to the broad patterns of our history;
- B. are associated with the lives of persons significant in our past;
- C. embody the distinctive characteristics of a type, period, or method of construction; or that represent the work of a master; or that possess high artistic values; or that represent a significant and distinguishable entity whose component may lack individual distinction (such as a district); or
- D. have yielded, or may be likely to yield, information important in history or prehistory.

In addition, National Register Bulletin 16 (November 30, 1986, Rev. 1990) states:

A contributing building, site, structure, or object adds to the historic architectural qualities, historic association, or archeological values for which a property is significant because a) it was present during the period of significance, and possesses historic integrity reflecting its character at that time or is capable of yielding important information about the period; or b) it independently meets the National Register criteria.

A noncontributing building, site, structure, or object does not add to the historic architectural qualities, historic association, or archeological values for which a property is significant because: a) it was not present during the period of significance; b) due to alterations, disturbances, additions, or other changes it no longer possesses historic integrity reflecting its character at that time or is incapable of yielding important information about the period; or c) it does not independently meet the National Register criteria.

The historical significance of Elkmont, the Wonderland Hotel and the cabins is discussed in the National Register nomination prepared for the District. Section 8 of the nomination states:

The District is significant under Criterion A (historical events) as the only remaining collection of early 20<sup>th</sup> century resort cabins retaining integrity in the Appalachian Mountains of Tennessee...Elkmont is significant under Criterion A in the area of entertainment/recreation. Elkmont was formed during the outdoor recreation movement of the early 20<sup>th</sup> century. This movement stressed a return to nature and resulted in the construction of hotels and mountain camps throughout America. The universal enthusiasm of Americans for the “back to nature movement” could be seen in the vast expansion of the national park and forest system under Presidents Theodore Roosevelt and William Howard Taft, the popularity of outdoor adventure stories, creation of the Boy Scouts in 1910 and the Campfire girls in 1912, and the vogue of bird watching and sportsman’s clubs. In the Southern Appalachians, this renewed interest in outdoor life led to the construction of numerous hotels and mountain cottages.... Elkmont is probably unique in its permanent long- time association with individuals prominent in the business, professional, social, and civic life of East Tennessee (Thomason et al. 1993).

Elkmont has both local and state significance. Not only is this resource unique in Sevier County, but no similar collection of early 20<sup>th</sup> century cabins and mountain hotels is known to exist in the Appalachian Mountains of East Tennessee. Other summer resort complexes in the vicinity such as Line Springs and Dupont Springs have been razed, while the resort cabins at Kinzel Springs in Blount County have been modified and no longer retain their historic integrity. The creation of GRSM [the Park] in the 1930s largely halted construction at Elkmont resulting in few changes to its pre- 1940 appearance.

The Wonderland Hotel was fairly typical for its time period. However, unlike other resort hotels on commercial rail line or roads, it was located deep within the mountains in an area accessible primarily by train up the Little River, or for the very hearty, by a primitive road over the mountain. The train that led to Elkmont was a logging train that was also used as an excursion train for tourists. As a result, the town became a popular tourist destination.

The collection of buildings and features at Elkmont is greater than any single building. As National Register Bulletin 15, “How to Apply the National Register Criteria for Evaluation” points out, a district can be eligible under Criterion C (design/construction) even if its “components may lack individual distinction”. The National Register nomination states:

The Wonderland Hotel and Elkmont cabins are architecturally significant because their forms and plans typify “rural building traditions in the Tennessee Mountains” (Thomason et al. 1993). The buildings illustrate both local craftsmanship and the use of locally available materials (i.e. river rock and locally milled lumber), as well as stock material brought from outside the area (such as windows, doors and hardware). The buildings also “reflect a simplicity of form and function” (Thomason et al. 1993). Porches tie the buildings directly to the surrounding natural landscape, as do the wood and stone building materials.

River rock also is used as a landscape feature in retaining walls, walkways, and planters.

While the existing District nomination was listed for “Entertainment and Recreation” and for “Architecture”, other features of the cultural landscape visible today that retain historic integrity include stone walls, cemeteries, patios, planters, walkways and remnants of the vistas that were dominant during the period of significance. These landscape features are part of the District’s character and will be accounted for in the NEPA process.

Although a complete archeological survey of the District has not been conducted, a phased investigative process conducted under the Archeological Resources Protection Act (ARPA), and under an approved Research Design in accordance with Section 106 of the NHPA and its implementing regulations, has been undertaken. Both prehistoric and historic archeological resources are present, some of which are considered significant. Archeological resources, while not the original reason for the District’s nomination, are also taken into account when developing a management plan. The information they provide contributes to the understanding of the continuum of human occupation within this part of the Park.

Although the Elkmont Campground is located centrally within the District, it is not the focus of this environmental planning process. It was included in the District primarily because it was the site of the logging community of Elkmont and its inclusion also ties the two social clubs together into one geographically contiguous historic resource area.

### 1.3.2 Vision

The overall goal for this project is to develop a full range of management alternatives under NEPA, to compare potential impacts that would result from implementation of each of the alternatives, and to develop an achievable management plan that considers public comment in addition to agency regulations, policies and guidelines. The basis of the alternative development process was a series of goal statements for the District. The primary goal of this planning process identified through the public planning process is to *foster enjoyment, understanding, appreciation, and protection of natural and cultural resources both within Elkmont Historic District and Park- wide by:*

- creating opportunities for emotional and intellectual connections to these resources;
- protecting and perpetuating the significant and diverse natural resources and ecosystems (including forest communities and water resources) found within Elkmont Historic District, keeping them free from impairment; and
- protecting and perpetuating the tangible (archeological sites, and historic building and structures, landscapes and features) and intangible (feelings of attachment and family life, myth, folklore and ideology) aspects of the cultural resources that comprise the District.



### 1.3.3 Interpretive Themes and Goals

Resource education themes and goals for Elkmont were developed cooperatively with input from Park staff and the public. They were based on the Park's 2001 Comprehensive Resource Education Plan (NPS 2001a) and considered the history and contributions to the Park made by the District. The overall interpretative goal is to *provide visitors with an understanding of the significant cultural and natural resources within the District through educational programs/activities and media that interpret and discuss the following topics:*

- the history of a national park movement in the Great Smoky Mountains from the 1890s to 1934, including the issue of whether or not to designate the area as a National Park or National Forest, utilizing the stories of individuals such as Colonel David Chapman and James B. Wright, who held opposing viewpoints, but both owned Elkmont properties;
- the growth of a local and regional tourist resort industry (including the “Back to Nature” movement of the early 20th century), which helped fuel the Park idea, from the 1890s to the present;
- the logging industry's impact on the forest resources in the Smokies and, in particular, the significance of the Little River Lumber Company in the formation of the Elkmont community, Elkmont's evolution as a summer resort, and the establishment of the Park;
- the architectural styles of the Elkmont structures that predominantly made use of native materials and exemplify simplicity of form and function; and
- preservation of cultural resources in a park designated for its natural wonders, evident in Park management's integration of historic preservation with the continuation of natural processes.

Visitor education programs and services provided at Elkmont must also fall within the scope of the Park's major themes of diversity and abundance, refuge of scenic beauty, and a continuum of human activity.

## 1.4 Management Objectives

As stated in the 1982 Plan, the overall management objective for the Park is to “manage the Park in a manner consistent with the purpose of preservation, enjoyment and benefits to humankind through scientific study of its distinctive combination of natural and cultural resources” (NPS 1982). The 1982 Plan also includes management objectives prepared by the Park superintendent for each of the Park's resources. During the process of developing new management plan alternatives, management goals and objectives specific to various resources at Elkmont were refined to reflect current management direction. The sections below provide both broad and specific management direction for resources within the District.

### 1.4.1 Cultural Resources

In general, management objectives for cultural resource preservation at the Park include five goals (NPS 1982):



- Identify, evaluate, protect and preserve the Park's cultural resources in a manner consistent with legislative and executive requirements and NPS historic preservation policies.
- Reduce, to the degree possible, deterioration of historic structures that are determined, through objective evaluation, to merit long- term preservation for interpretive or other purposes.
- Preserve historic structures associated with pioneer life, such as log residences, churches, schools, and barns.
- Reduce and, as possible, eliminate the modern developments known to adversely affect archeological resources of the Oconaluftee- Deep Creek area and those not necessary to the direct support of essential Park programs.
- Ensure that cultural resources and settings are maintained in a manner compatible with natural resource management objectives.

As part of the overall development of project goals and objectives, more specific cultural resource goals and management objectives were developed for the District by the Park with input from the public. Consistent with NPS policy, the proposed goals and objectives for cultural resources of the District include:

- Take into account the total context of impacts to the cultural resources present, extant (above) and below ground, and avoid or minimize these impacts if possible.
- Maximize opportunities for adaptive reuse of resources at the Wonderland Club and Appalachian Club areas as a means of meeting identified Park administrative and visitor use needs.
- Ensure that the selected alternative retains buildings, structures and component landscapes in clusters and associations sufficient to provide a sense of character of the District.
- Foster opportunities for thematic interpretation of the history and significance of the District and its contribution to the history of the Park.

Specific management objectives state that any historic resources selected for preservation should serve an agency need and should be adequately maintained. Besides the avoidance or minimization of impacts to buildings and structures, any human remains or funerary objects or objects of cultural heritage are to be treated in accordance with the provisions of the Native American Graves Protection and Repatriation Act and any other applicable laws and regulations. Any traditional cultural property located within the District is also to be protected. Traditional cultural properties are most often, but not necessarily, associated with Native American cultures. They are ethnographic resources that, for at least two generations, are associated with cultural practices or the beliefs of a living community that are rooted in that community's history or are important in maintaining its cultural identity (NPS 1998a). To date, no traditional cultural properties have been identified within the District.

#### **1.4.2 Natural Resources**

Management actions must be consistent with legislative and executive mandates as well as NPS policies. To accomplish these goals, the 1982 Plan (NPS 1982) incorporates the following components when implementing resource management strategies:

- Protect and perpetuate the significant and diverse natural resources and ecosystems (including forest communities and water resources) found within the District, keeping them as free as possible from the adverse influences of human intrusion.
- Protect and, where possible, restore the natural processes as they would proceed if they had never been influenced by non- Indian society.
- Ensure adequate protection for threatened or endangered species; critical habitat; and unusual or particularly vulnerable natural resources of the Park, such as virgin forest, brook trout habitat, beech gaps and outstanding cove hardwood stands.
- Minimize, to the extent possible, the adverse impact of exotic plants (e.g., mimosa, kudzu, Japanese honeysuckle, tree- of- heaven, and princess tree) and animals (e.g., European wild boar, rainbow and brown trout) on the Park's natural resources and processes.
- Manage the Park as a core unit of the Great Smoky Mountains International Biosphere Reserve.

The NPS has also identified additional management goals relevant to management of the District. These include:

- Protect streams, seeps, wetlands and floodplains.
- Provide water resource management methods consistent with responsibilities outlined for Outstanding National Resource Waters.
- Protect federally- listed threatened and endangered species and their habitats.
- Protect Montane Alluvial Forest and its ability to regenerate.
- Avoid loss of habitat for the synchronous firefly population.
- Ensure that visitor use levels are maintained within the level that natural resources have the ability to sustain.
- Minimize areas of disturbance and maximize the use of previously disturbed areas.

#### **1.4.3 Visitor Use and Experience**

Guiding principles for visitor use and experience are to promote visitor activities at appropriate locations, levels, and times that minimize adverse impacts on Park resources, while achieving educational goals and ensuring that visitor access to adjacent use areas is adequately maintained (i.e. trails).

The primary goal for visitor use and recreation is to foster enjoyment, understanding, appreciation and protection of natural and cultural resources within Elkmont and throughout the Park by creating emotional and intellectual connections to these resources. The following objectives will aid in achieving that goal:

- Ensure that “traditional” recreational opportunities currently enjoyed by the public are adequately provided for (including support facilities).



- Ensure that visitor education programs and services fall within the scope of the Park's major themes of biodiversity, scenic beauty and a continuum of human activity.
- Recognize the opportunities for Elkmont's cultural resources to aid in interpretation of the Park's origins.
- Identify, design and implement educational activities and media that interpret the unique cultural resources found at Elkmont.
- Provide visitors with an understanding of the significance of Elkmont's cultural resources.

#### **1.4.4 Interpretation**

Interpretation in the Park involves conveying natural, cultural and historical information to the public in such a way as to incorporate discussion of the values of various resources. Management objectives for interpretation include the following (NPS 1982):

- Demonstrate by our own actions our concern for Park resources and the environment beyond Park boundaries and show that low- impact activities can be practical and pleasant.
- Make all resource information available in forms that benefit and provide enjoyment for each of the primary visitors to the Park: scientist, historian, drive- through visitor, interested amateur "specialist," employee and neighbor.
- Adequately inform visitors and potential visitors of the opportunities and limitations presented by the Park in advance of, as well as during, visits and the means of using the Park safely and responsibly.
- Convey to visitors, neighbors and the nation, a sense of the tangible and intangible values associated with the great diversity of the Park's living organisms, the unique combination of extent and accessibility of its wilderness sanctuary and the extraordinary remnants of Native American and pioneer culture found within it.

#### **1.4.5 Partnerships**

NPS policy states that the agency may seek opportunities to enhance natural resource management within the Parks and outside its administrative limits by working cooperatively with other public agencies, Native American tribes and private landowners. Preservation of ecosystems may be more effective when the NPS works with other parties that have similar objectives. The NPS will also pursue partnerships with other agencies and groups to minimize the impacts of land management practices and other activities initiated outside Park borders. Some external threats to Park resources include noise, artificial lighting, contamination of water, unsustainable allocation of water resources, air pollutants, wetland destruction and degradation, adverse impacts on visual quality resources, damage to endangered and threatened species' habitats and infiltration of invasive species (NPS 2000). Currently, no partnerships have been identified as being integral to any of the proposed alternative management options for Elkmont Historic District.



### **1.5 Summary of Alternative Development Issues**

The NPS planning team, with input from Park staff, the public and Consulting Parties, identified a number of issues in regard to future management of the District. The primary concerns were related to cultural resources, natural resources and visitor experience. The plan chosen for the District will provide guidelines for addressing specific issues, while conforming to the Park's mission, the vision for Elkmont and any laws or regulations that apply to Park planning procedures. This plan should also aid the Park in meeting its stated objectives for each resource category.

### **1.6 Derivation of Impact Topics**

Impact topics are those special resources or management policies that have a bearing on the selection of an alternative for the District. The impact topics relevant to the Elkmont alternatives analysis are based on laws, policies and regulations, and comments made by the public during the scoping process.

Impacts may be direct (at the same time and place as the proposed action) and/or indirect (occur later in time or farther in distance than the action), and must be examined together for their cumulative effect (the incremental environmental impact of the action, together with impacts of past, present and reasonably foreseeable future actions, regardless of what agency or person undertakes such other actions). Further, impacts have to be assessed in terms of sustainability and long-term management. This means that the impact analysis must examine the relationship between the short-term implementation of an alternative and the long-term productivity of the resources within the District. It must also identify any irreversible or irretrievable (permanent) commitment of resources and any adverse impacts that could not be avoided. The information gathered for the EIS must be sufficient to:

1. assess the environmental, historic, economic and social values that will be affected, either beneficially or adversely, by the proposed actions and alternatives; and,
2. demonstrate compliance with related environmental requirements; and
3. allow for selection of an alternative that will consider the importance of all resources and balance these considerations with the potential for resource impacts associated with each alternative.

The list of issues brought forth for analysis in this Draft EIS includes:

- cultural resources
- wetlands
- floodplains
- water quality
- air quality
- biological resources
- terrestrial habitats and forest communities
- aquatic habitats
- endangered and threatened species
- fish and wildlife



- geology and soils
- transportation and access
- visitor use and experience
- noise
- aesthetics and viewshed
- land use –existing and historic
- social and cultural patterns
- impacts to the General Management Plan
- economics
- appropriate and necessary (NPS policy and mission)

The following section provides a discussion of the impact topics identified during project scoping as appropriate for analysis in each of the proposed management alternatives for the District.

#### **1.6.1 Cultural Resources**

There are many types of resources classified as cultural resources and they are usually recognized as districts, sites, buildings, structures, and objects. Generally, cultural resources reflect the imprint of human occupation on the environment. They may be above ground, such as buildings and structures, or below ground, such as archeological resources. Cultural resources also include the cultural landscape, which illustrates how people used the area and shaped it to fit their liking. Cultural landscape features include foot trails, road networks, plantings, fountains, vistas and other manipulations of the landscape. Traditional cultural properties are also protected cultural resources and, while they may not be exemplified in a building or structure, they are considered places of reverence or importance to cultural traditions. More discussion of how the NPS views these cultural resources is provided in the *Cultural Resource Management Guideline* (NPS 1998a).

#### **1.6.2 Natural Resources**

Many components of the natural environment at Elkmont are covered by laws and policies consistent with guidance and the decision- making process provided for in NEPA. Those laws or orders relevant to planning for the District are the Endangered Species Act and Executive Orders 11988 and 11990 concerned with Floodplain Management and Wetland Protection, respectively. The NEPA process can incorporate the consultation requirement of Section 7 of the Endangered Species Act. The executive orders concerning floodplains and wetlands direct the NPS to avoid, to the extent possible, both long- and short- term impacts to those resources. Both wetlands and floodplains are important resource components of the District. Wetlands and floodplains are also under the jurisdiction of the U.S. Army Corps of Engineers, the agency responsible for implementing the regulatory process provided for by Section 404 of the Clean Water Act.

Other guidance, policy and regulations that deal with natural resource protection, including impacts to air and water quality, changes in noise levels, impacts to aquatic habitat and fisheries, terrestrial resources including forest communities, wildlife, and the presence of invasive plant or animal species have also been considered. Geology and



soils are also impact topics since certain activities are dependent on the geology and the ability of the soils to accommodate or withstand particular land uses.

### 1.6.3 Interpretation and Visitor Use

Interpretation and visitor use are topics key to the development of a General Management Plan Amendment that addresses the future of Elkmont. Interpretation is consistent with one of the purposes of the Park, “to preserve its exceptionally diverse natural and cultural resources and to provide for public benefit from and enjoyment of those resources in ways that will leave them basically unaltered by modern human influences” (NPS 2001a). Three themes form the basis of the Park’s *Comprehensive Resource Education Plan*: diversity and abundance, a continuum of human activity, and a refuge of scenic beauty (NPS 2001a). Given its abundance of natural resources and its cultural legacy, Elkmont provides a place within the Park that these themes can be interpreted for the public. Specifically, the District provides opportunities to view remnants of historic land uses of the region representative of the logging, railroad and vacation community prior to establishment of the National Park.

- During the initial steps in developing a plan for the District, project goals and objectives were developed. These goals and objectives were presented to the public as part of the scoping process. Final project goals and objectives considered the public comments received and are consistent with those identified in the Park’s *Comprehensive Resource Education Plan*.

Goals and objectives identified specifically for the District include:

- ensure that visitor education programs and services fall within the scope of the Park’s major themes of diversity and abundance, refuge of scenic beauty and a continuum of human activity;
- ensure that the traditional recreational activities of hiking, camping and fishing continue to be adequately provided for, including the necessary support facilities;
- ensure that actions/alternatives retain buildings, structures and component landscapes in clusters and associations sufficient to provide a sense of character of the District and foster opportunities for thematic interpretation of the history and significance of the District and its contribution to the history of the Park.

Guiding principles were developed by the NPS that address visitor activities and access to the District. The guiding principles for visitor use were designed to:

- promote visitor activities at appropriate locations, levels and times that minimize the adverse impacts on Park resources and achieve educational goals identified in applicable current management documents; and
- ensure that visitor access to adjacent use areas are adequately maintained (i.e., trails).

To summarize, planning for the interpretation and visitor use at Elkmont is founded on NPS laws, management policies, and the Park's *Comprehensive Resource Education Plan*, as well as intensive public input and comment solicited during the scoping and project planning phases.

#### **1.6.4 Socioeconomic Environment**

The Park serves many socioeconomic functions from international to local economies. Besides being designated as an International Biosphere Reserve in 1976 and a World Heritage Site in 1983, it also serves as a popular recreational destination. It has earned the distinction of being one of the most highly visited National Parks in the country with annual visitation between 9 and 10 million for much of the last decade (NPS 2004b). In the past ten years, two percent of the Park's visitors were of international origin. Because it is a major attraction for visitors from all over the world, the Park has been the source of economic stimulus for development of western North Carolina and East Tennessee. Seventeen percent of the visitors originated from Tennessee (Littlejohn 1997). Located in both Tennessee and North Carolina, the Park is easily accessible from many of the major population centers of the eastern United States. The gateway communities of Gatlinburg, Cosby, Cherokee and Townsend have traditionally provided lodging and dining facilities to Park visitors. Besides backcountry and campground overnight facilities, including the remote Le Conte Lodge, no commercial overnight lodging is available in the Park.

During the alternatives development process, some of the public expressed a desire to reuse cabins and other buildings for overnight lodging and dining. If implemented as part of an alternative, this visitor use would have to be provided under a concession's contract, and thus would also be subject to scrutiny under the policies and procedures that govern park concessions, as described later in this document.

Besides examining overnight lodging as an alternative component in accordance with NPS concession law and policies, the potential impacts to the gateway communities, as well as the impact upon the resources found within the District, were examined. Elkmont is easily accessible to Park visitors. It is located near the Sugarlands Visitor Center, Gatlinburg and Townsend. A 1996 visitor use study found that 43 percent of summer visitors and 41 percent of all fall visitors obtained access to the Park through the Gatlinburg entrance. Given the proximity of the Elkmont area to the Gatlinburg entrance and Sugarlands Visitor Center, a substantial number of visitors, particularly those staying for less than a full day, could use trails and/or trailheads that originate at Elkmont, as well as any other recreational, interpretive or other visitor facilities or uses that could be included in the management plan.

#### **1.6.5 Necessary and Appropriate**

Certain uses of the District must be necessary and appropriate, meeting criteria provided by NPS concession law. This body of law provides that the Director of the NPS can solicit and enter into contracts to provide visitor services. The primary legislation controlling the necessary and appropriate determination is found in Title IV of the National Parks Omnibus Management Act of 1998 (Public Law 105- 391). In this law, visitor services are defined as accommodations, facilities and services determined to be

necessary and appropriate for the public use and enjoyment of a park area. These services are provided for under contract to the NPS by a concessioner who charges a fee to the user. Examples of visitor services are lodging, campgrounds, food service, merchandising, tours, recreational activities, guiding, transportation and equipment rental, sale of interpretive materials, and the provision of interpretive programs.

The policy of Congress and the Secretary of the Interior provides the basis of concession contracts in the law (36 CFR Ch. I Subsection 51.2). Visitor services can only be provided under safeguards so that they will not “unduly impair park values and resources” and are “limited to locations that are consistent to the highest practicable degree with the preservation and conservation of the resources and values of the park.” Visitor services must also be deemed “necessary and appropriate for the public use and enjoyment of the park in which they are located.”

NPS *Management Policies* (NPS 2000) dealing with commercial visitor services provides further guidance on this matter. Even though the Park does not have a Commercial Services Plan, other planning potentially involving visitor services must follow the same criteria. Concessions have to support the “park’s purpose and significance, exceptional resource values, and visitor experience objectives,” and must “be consistent with the Park’s enabling legislation.” Besides being economically feasible, the following criteria (NPS 2001) must be met for each concession.

The concession must:

- be appropriate and necessary for the public use and enjoyment of the park, and the need for the use cannot be met outside park boundaries;
- further the protection, conservation and preservation of the environment, and park resources and values;
- be based on sustainable principles and practices in its planning, design, siting, construction, utility systems, selection and recycling of building materials, and waste management; and
- enhance visitor use and enjoyment of the park without causing unacceptable impacts to park resources or values.

Historically, the 1916 Organic Act mandated that the NPS conserve its park resources, both natural and cultural, “unimpaired” for the enjoyment of future generations. When the initial portion of the land that currently comprises Great Smoky Mountains National Park was donated by the states of North Carolina and Tennessee in 1930, the presentation of the deeds for this land stated that the Park, when established, “will create, in the heart of the Appalachian Mountains, a permanent sanctuary for animal and bird life and a botanical garden and arboretum which scientists say will be unequalled in the world” (NPS 2001a). Most recently, the Park’s 1998 5- Year Strategic Plan mission statement further refined the purpose of the Park as preserving its exceptionally diverse natural and cultural resources and providing for public benefit from and enjoyment of those resources in ways that will leave them basically unaltered by modern human influences (NPS 2001a).



Two of the project alternatives presented in this document propose visitor services in the form of lodging, dining and related facilities operated by a concessioner. The NPS *Management Policies* mandate that overnight accommodations and food services be restricted to the kinds and levels necessary and appropriate to achieve Park purposes. In general, they should be provided only when they cannot adequately be provided in the vicinity of the Park. They may be justified when the distance and travel time to accommodations and services outside the Park are too great to permit reasonable use, or when leaving the Park to obtain incidental services would substantially detract from the quality of the visitor experience (NPS 2000).

#### **1.6.6 NPS Operations**

The current operations within the Park, and specifically at Elkmont, include law enforcement, operation and maintenance of the campground, operation of the existing wastewater treatment plant and the existing water supply system, maintenance of existing roads and trails, removal of exotic invasive vegetation, treatment of hemlocks to fight the woolly adelgid infestation, stabilization of the historic buildings and visitor education activities. The effect that any of the proposed alternatives will have on current operations within Elkmont and those that may have an impact Park- wide are discussed in the Environmental Consequences section of this document (Chapter 4).

#### **1.6.7 Agency Consultation**

A variety of agencies were contacted and consulted during this planning process. In addition to coordination with NPS staff, agencies contacted for information regarding threatened and endangered resources, species occurrences, habitat requirements and characteristics, and vegetation communities included:

- U.S. Fish and Wildlife Service  
(threatened and endangered resources)
- Tennessee Department of Environment and Conservation  
(water quality, wastewater and permitting issues)
- USDA Natural Resources Conservation Service  
(soils mapping)
- Tennessee Natural Heritage Program  
(threatened and endangered resources, vegetation community data)

Agencies contacted regarding cultural and archaeological resources included:

- Tennessee Historical Commission (SHPO)
- Tennessee Division of Archaeology
- Eastern Band of Cherokee Indians (EBCI) Tribal Historic Preservation Office

In addition, representatives from the Tennessee Historical Commission, the Tennessee Division of Archeology and the Advisory Council on Historic Preservation served as Consulting Party members at the request of the NPS. Tribal Historic Preservation Officers from the Chickasaw Nation and Eastern Band of Cherokee Indians have been involved through written and verbal communication.

## 1.7 Other Planning Actions

A number of projects, primarily with a transportation focus, are planned or proposed in the area as well. These actions are considered in the cumulative impacts analysis (Chapter 4) because of their connection in allowing visitors access to the Park or their potential to affect resources within the Park. Brief descriptions of these projects follow:

### U.S. 441/Newfound Gap Road Improvements

The Federal Highway Administration has planned to implement proposed improvements to a section of Route 441 /Newfound Gap Road from the Park entrance south of the Oconaluftee Visitor Center near Cherokee, North Carolina, continuing into Park lands (NPS 2003b). The planning process is in progress with construction expected to take place over the next three to four years. The project includes repaving all 17 miles of Newfound Gap Road (U.S. 441) between the Park's boundary with Cherokee, North Carolina, and the Tennessee state line at Newfound Gap. Phase I of the project is limited to repaving and reconstruction within the existing road corridor along the 10.5- mile stretch of road from just north of the Collins Creek Picnic Area to Newfound Gap. However, the proposed work for Phase II may include more extensive construction outside the existing right- of- way to realign six intersections for improved safety along the 6.5 miles of the road from Collins Creek Picnic Area to the Park boundary at Cherokee (NPS 2004c).

### U.S. 19/441 Bridge Project

Construction of a new four- lane bridge across the Oconaluftee River in Cherokee, North Carolina, is planned to replace the existing three- lane structure along Route 19/441. The proposed work consists of constructing a new four- lane bridge next to the existing bridge, then removing the old bridge (NPS 2003b).

### U.S. 19 Improvements

The Eastern Band of Cherokee Indians is in the process of implementing proposed enhancements to a segment of Route 19 from Cherokee to Maggie Valley, North Carolina. The project is separated into seven phases, A through G. Some phases have been funded and are in progress, while other phases are not yet scheduled for construction due to lack of confirmed funding sources (NPS 2003b).

### Cades Cove

An EIS process is proceeding to assess reasonable alternatives for addressing problems with traffic congestion at Cades Cove, a historic district that includes cultural resources representing the period from the 1800s to the early 1900s when European settlers developed the area as an agricultural community. Visitors often need two to three hours to complete the one- way loop road. During peak visitation, completing the loop may require four to six hours. Other concerns relate to the lack of adequate facilities for the number of visitors that currently travel to the area, protecting cultural resources from overuse, and continuing to provide a quality visitor experience (NPS 2004d).



### Foothills Parkway Construction

The Foothills Parkway is a scenic roadway near the northern boundary of the Park. When finished, the road is planned to span 72 miles from Chilhowee, just west of the Park boundary, to the junction with Interstate 40, just north of the Park boundary, in Cherokee National Forest. Several segments of the road have been completed, but others are being evaluated and have not yet secured funding. One section includes the proposed construction of eight bridges over the next ten years (NPS 2003b).

### North Shore Road

An EIS process is proceeding to assess reasonable alternatives that would resolve a 1943 agreement that obligates the Department of the Interior to build a road to replace North Carolina State 288, a road which existed in an area that was flooded when the Fontana Dam was built. The agreement asserted that the new road would be built through the Park along the north shore of Fontana Lake. In the 1960s, approximately seven miles of the proposed 30- mile road were completed before construction was stopped due to funding and environmental concerns. A variety of non- build and build alternatives are now being considered as possible ways to resolve the long- standing controversy concerning completion of the road (NPS 2004e).

### Other Actions

Other actions taking place in Sevier County include widening of U.S. 321 in Gatlinburg; milling and paving operations along U.S. 441 (SR71) in Pigeon Forge, approximately five miles north of the Park; and road maintenance along West Foothills Parkway (from Look Rock to Rt.129), approximately one mile west of the Park. In addition to human actions, there are some natural occurrences that affect area resources as well. One natural event that has impacted the area is heavy rains in 2003 that caused severe damage along Parsons Branch Road from Cades Cove to U.S. 129.