



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Asheville Field Office
160 Zillicoa Street
Asheville, North Carolina 28801

July 12, 2007

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

Dear Mr. Ditmanson:

Subject: Proposed Oconaluftee Visitors Center Improvements, Great Smoky Mountains National Park, Swain County, North Carolina

In your letter dated June 18, 2007, you requested our comments about the subject project. The following comments are provided in accordance with the provisions of the National Environmental Policy Act; Fish and Wildlife Coordination Act, as amended (16 U.S.C. 661-667e); and section 7 of the Endangered Species Act of 1973, as amended (16 U.S.C. 1531-1543) (Act).

The proposed expansion will include a 7,900-square-foot building for visitor services that will house restrooms, museum space, an information desk, and a sales area. The existing visitor center will be retained for administrative use. No other construction details were provided.

Endangered Species. As with all federal activities, we recommend surveying the area (if suitable habitat is present) for rare species prior to any on-the-ground activities to ensure that no populations of these species are inadvertently lost. Enclosed is a list of species for Swain County that are on the *Federal List of Endangered and Threatened Wildlife and Plants* and federal species of concern that may occur in the project impact area. Federal species of concern are not legally protected under the Act and are not subject to any of its provisions, including section 7, unless they are formally proposed or listed as endangered or threatened. We are including these species in our response to give you advance notification.

Erosion Control and Wetland/Stream Protection. We want to emphasize that stringent measures to control sediment and erosion should be implemented prior to any ground disturbance and should be maintained throughout project construction.

The treatment of storm water leaving the project area is also a concern. This new construction will create more impervious surface area (roofs, roads, and parking lots), which will collect pathogens, metals, sediment, and chemical pollutants and quickly transmit them to receiving waters. According to the Environmental Protection Agency, this nonpoint-source pollution is one of the major threats to water quality in the United States and is linked to chronic and acute illnesses from exposure through drinking water and contact recreation.

Best management practices can reduce, but not eliminate, pollutant loadings of common storm-water pollutants. Designs that collect runoff and allow it to infiltrate the soil have the highest documented pollutant-removal efficiency, eliminating nearly all lead, zinc, and solids and more than 50 percent of total phosphorous. Ponds and wetlands, which allow contaminants to settle out of the water column or be broken down by sunlight and biological activity, can remove more than 70 percent of bacteria. The North Carolina Wildlife Resources Commission has developed a "Guidance Memorandum to Address and Mitigate Secondary and Cumulative Impacts to Aquatic and Terrestrial Wildlife Resources and Water Quality" that we support and encourage you to use. It can be accessed via the Internet as follows:

http://www.ncwildlife.org/pg07_wildlifespeciescon/pg7c3_impacts.pdf

We offer the following recommendations to help address the secondary and cumulative impacts associated with this project and to help minimize impacts to fish and wildlife resources:

1. Use grassed swales in place of curb and gutter and on-site storm-water management (i.e., bioretention areas, such as rain gardens and artificial wetlands) that will result in no net change in the hydrology of the watershed. All storm-water outlets should drain through a vegetated upland area prior to reaching any stream or wetland area. Sufficient retention designs should be implemented to allow for the slow discharge of storm water, attenuating the potential adverse effects of storm-water surges; thermal spikes; and sediment, nutrient, and chemical discharges.
2. Install and maintain stringent measures to control erosion and sediment in order to prevent unnecessary impacts to aquatic resources downstream of the project site. Disturbed areas should be reseeded with seed mixtures that are beneficial to wildlife. Fescue-based or other nonnative or exotic invasive species mixtures should be avoided. Native annual small grains appropriate for the season are preferred and recommended in order to quickly stabilize bare soils while native seed mixtures become established. Perimeter erosion-control devices should be installed prior to any on-the-ground activities. Frequent maintenance of these devices is critical to their proper function in order to minimize sediment discharge from the project site.

3. Avoid the complete clearing of land. If clearing is necessary, efforts should be made to avoid the removal of vegetation, particularly large trees, at the edges of construction corridors and rights-of-way and in any surrounding development. Where feasible, use woody debris and logs from clearing activities to establish brush piles and downed logs at the edges (just in the woods) of all cleared areas to improve habitat for wildlife. Allowing the area to develop into a brush/scrub habitat would maximize benefits to wildlife. Additionally, herbicides should not be used near wetland areas or streams.

At this stage of project development and without more specifics about construction locations or techniques, it is difficult for us to assess potential environmental impacts (direct, indirect, and cumulative). We therefore recommend that any environmental document prepared for this project include the following (if applicable):

1. A complete analysis and comparison of the available alternatives (build and no-build alternatives).
2. A description of the fishery and wildlife resources within existing and required additional rights-of-way and any areas, such as borrow areas, that may be affected directly or indirectly by the proposed project.
3. The acreage and a description of the stream and wetlands that will be filled because of the proposed project. Wetlands affected by the proposed project should be mapped in accordance with the *Federal Manual for Identifying and Delineating Jurisdictional Wetlands*. We recommend contacting the U.S. Army Corps of Engineers (Corps) to determine the need for a Section 404 Clean Water Act permit. Avoiding and minimizing wetland impacts is a part of the Corps' permitting process, and we will consider other potential alternatives in the review of any permits.
4. The extent (linear feet as well as discharge) of any water courses that will be impacted because of the proposed project. A description of any streams should include the classification (Rosgen 1995, 1996) and a description of the biotic resources.
5. The acreage of upland habitat, by cover type, that will be eliminated because of the proposed project.
6. A description of all expected secondary and cumulative environmental impacts associated with this proposed work.
7. A discussion about the extent to which the project will result in the loss, degradation, or fragmentation of wildlife habitat from direct construction impacts and from secondary development impacts.

8. Mitigation measures that will be employed to avoid, eliminate, reduce, or compensate for habitat value losses (wetland, riverine, and upland) associated with any phase of the proposed project.

Thank you for allowing us to comment on this project. We request that you keep us informed of the status of this project so that we may keep our records up to date. Please contact Mr. Allen Ratzlaff of our staff at 828/258-3939, Ext. 229, if you have any questions. In any future correspondence concerning this project, please reference our Log Number 4-2-07-255.

Sincerely,



Brian P. Cole
Field Supervisor

cc:

Mr. David McHenry, Mountain Region Reviewer, North Carolina Wildlife Resources
Commission, 20830 Great Smoky Mtn. Expressway, Waynesville, NC 28786



North Carolina Department of Cultural Resources
State Historic Preservation Office

Peter B. Sandbeck, Administrator

Michael F. Easley, Governor
Lisbeth C. Evans, Secretary
Jeffrey J. Crow, Deputy Secretary

Office of Archives and History
Division of Historical Resources
David Brook, Director

July 27, 2007

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

Re: Improvements to Oconaluftee Visitor Center, Great Smoky Mountains National Park, Swain County,
ER 07-1149

Dear Mr. Ditmanson:

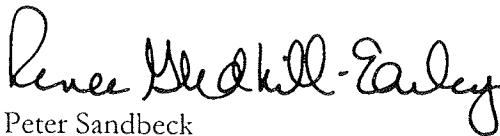
Thank you for your letter of May 21, 2007, transmitting the Statement of Work for the archaeological investigation at the location of the proposed improvements to the visitor facility at Oconaluftee. The Scope of Work appears to be sufficient for identifying intact archaeological deposits within the designated areas for initial planning purposes. We look forward to receiving a report detailing the results of the investigation and to further consultation regarding the proposed project.

As plans/designs for the new facilities are developed, please forward them to us for review and comment.

The above comments are made pursuant to Section 106 of the National Historic Preservation Act and the Advisory Council on Historic Preservation's Regulations for Compliance with Section 106 codified at 36 CFR Part 800.

Thank you for your cooperation and consideration. If you have questions concerning the above comment, contact Renee Gledhill-Earley, environmental review coordinator, at 919/733-4763 ext. 246. In all future communication concerning this project, please cite the above referenced tracking number.

Sincerely,


Peter Sandbeck

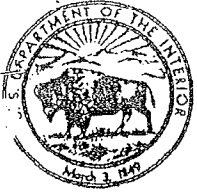
cc: State Clearinghouse

ADMINISTRATION
RESTORATION
SURVEY & PLANNING

Location
507 N. Blount Street, Raleigh NC
515 N. Blount Street, Raleigh NC
515 N. Blount Street, Raleigh, NC

Mailing Address
4617 Mail Service Center, Raleigh NC 27699-4617
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Telephone/Fax
(919)733-4763/733-8653
(919)733-6547/715-4801
(919)733-6545/715-4801



IN REPLY REFER TO:

United States Department of the Interior

NATIONAL PARK SERVICE
Great Smoky Mountains National Park
107 Park Headquarters Road
Garlinburg, Tennessee 37738



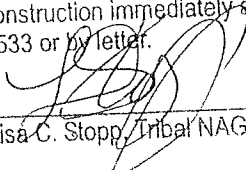
H30

May 21, 2007

Lisa Stopp
Historic Preservation Office
United Keetoowah Band of Cherokee Indians
P. O. Box 746
2450 South Muskogee
Tahelquah, Oklahoma 74465-0948

The United Keetoowah Band of Cherokee Indians in Oklahoma has no objection to the referenced project. However, if any remains, artifacts or other items are inadvertently discovered, please cease construction immediately and contact us at 918-456-6533 or by letter.

Dear Ms. Stopp:


Lisa C. Stopp, Tribal NAGPRA POC Date

JUN 01 2007

Great Smoky Mountains National Park has begun an Environmental Assessment process to analyze alternatives to provide for improved visitor services at the Oconaluftee area of the Park in Swain County, North Carolina. The purpose of this project is to improve the visitor facility at Oconaluftee to tell the Park's cultural history and provide for visitor needs. There is an ambitious tentative schedule for this project which calls for construction of the facility to begin in September 2009, to coincide with the 75th Anniversary of Great Smoky Mountains National Park.

By this letter, we would like to initiate formal consultation with your office regarding Section 106 of the National Historic Preservation Act and 36 CFR 800.3. As allowable under 36 CFR 800.8, the Park proposes to coordinate Section 106 consultation with the steps taken to meet the requirements of the National Environmental Policy Act (NEPA).

The project site is located within the boundaries of the Oconaluftee Archeological District which is listed on the National Register of Historic Places (NRHP). It is also adjacent to the Oconaluftee Visitor Center which was built in 1941 and considered by the Park to be eligible for listing on the NRHP and the Mountain Farm Museum, a collection of historic structures most of which were relocated to Oconaluftee in the 1950s. A map showing proposed boundaries for an area of potential effect is enclosed. Generally, the area is bounded by Newfound Gap Road on the west and by the Oconaluftee River on the north and east.

With the wealth of archeological resources known to exist in other areas of the Oconaluftee Archeological District, the Park is not comfortable with a standard Phase I archeological approach to assessing potential impacts. The Park intends to conduct mechanical stripping of the plowzone deposits to identify whether archeological features and/or structures are present beneath the plow zone deposits within selected areas of the study site. The work

TAKE PRIDE
IN AMERICA 



North Carolina
Department of Administration

Michael F. Easley, Governor

Britt Cobb, Secretary

June 22, 2007

Mr. Dale Ditmanson
Great Smoky Mountains National Park
107 Park Headquarters Road
Gatlinburg TN 37738

Dear Mr. Ditmanson:

Subject: Scoping - Construction of visitor services to include: restrooms, museum space, information desk, sales area; building approx. 7,900 sq. ft. at Oconaluftee area of the Great Smoky Mountains Park in Swain County

The N. C. State Clearinghouse has received the above project for intergovernmental review. This project has been assigned State Application Number 07-E-0000-0394. Please use this number with all inquiries or correspondence with this office.

Review of this project should be completed on or before 07/22/2007. Should you have any questions, please call (919)807-2425.

Sincerely,

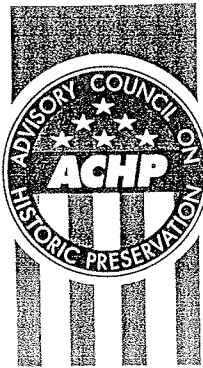
A handwritten signature in cursive script that reads "Chrys Baggett".

Ms. Chrys Baggett
Environmental Policy Act Coordinator

Mailing Address:
1301 Mail Service Center
Raleigh, NC 27699-1301

Telephone: (919)807-2425
Fax (919)733-9571
State Courier #51-01-00
e-mail Chrys.Baggett@ncmail.net

Location Address:
116 West Jones Street
Raleigh, North Carolina



Preserving America's Heritage

June 19, 2007

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

*Ref: Notification of Intent to Follow 36 CFR 800.8(c)
Proposed Oconaluftee Visitor Center Expansion
Swain County, North Carolina*

Dear Mr. Ditmanson:

On May 30, 2007, the Advisory Council on Historic Preservation received your notification of intent to follow 36 CFR 800.8(c) of our regulations, "Protection of Historic Properties" (36 CFR Part 800), to meet your section 106 requirements for the referenced undertaking. We have no preliminary comments at this point, however, we do recommend you continue consultation with the North Carolina State Historic Preservation Office and any other consulting parties on all potential impacts that may occur to historic properties.

Thank you for providing us with this notification. If you have any questions or require our further assistance, please contact Kelly Yasaitis Fanizzo at 202-606-8583 or via e-mail at kfanizzo@achp.gov.

Sincerely,

Reid Nelson
Assistant Director
Federal Property Management Section
Office of Federal Agency Programs

ADVISORY COUNCIL ON HISTORIC PRESERVATION

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