



IN REPLY REFER TO:

United States Department of the Interior

NATIONAL PARK SERVICE
Southeast Regional Office
Atlanta Federal Center
1924 Building
100 Alabama St., S.W.
Atlanta, Georgia 30303



SER-PC

FEB 09 2012

Memorandum

To: Superintendent, Great Smoky Mountains National Park

From: *Ben West* Regional Director, Southeast Region *[Signature]*

Subject: Finding of No Significant Impact (FONSI) – Joint Curatorial Collections Facility,
Great Smoky Mountains National Park

Attached please find the signed FONSI for the subject project.

If you require further assistance or information, please contact Ben West, Planning and Compliance Division, at 404-507-5700.

Attachment



FINDING OF NO SIGNIFICANT IMPACT FOR THE CONSTRUCTION OF THE JOINT CURATORIAL COLLECTIONS FACILITY GREAT SMOKY MOUNTAINS NATIONAL PARK -ENVIRONMENTAL ASSESSMENT-

GREAT SMOKY MOUNTAINS NATIONAL PARK
Gatlinburg, Tennessee

BACKGROUND

The Environmental Assessment (EA) for The Construction of the Joint Curatorial Collections Facility addressed the construction of permanent facilities to accommodate staff and museum, archival, and library collections from Great Smoky Mountains National Park (GRSM, the Park) and several surrounding east Tennessee National Park Service (NPS) units. The proposed curatorial facility, known as the Joint Curatorial Collections Facility (JCCF), would allow museum collections from NPS units across East Tennessee to be consolidated and properly processed, stored, and catalogued according to NPS standards. This facility would serve as a curatorial and storage site for NPS museum collections from Andrew Johnson National Historic Park (ANJO), Big South Fork National Recreation Area (BISO), Cumberland Gap National Historic Park (CUGA), GRSM, and Obed Wild and Scenic River (OBED). The facility will also store and make available archival and library collections from GRSM.

The Joint Curatorial Collections Facility (JCCF) is proposed to be built on land that will be donated to the federal government by the Great Smoky Mountain Heritage Center. The new facility would be located adjacent to the Heritage Center property, on land owned by the federal government and managed by the National Park Service.

Museum collections in National Parks are primary park resources, directly related to other resources, and are determined by the mission of the park as stated in legislation, proclamation, or executive order. As stated in NPS-28, "Cultural Resource Management Guideline," Chapter 9, "Museum collections (objects, specimens, and archival and manuscript collections) are important park resources in their own right as well as being valuable for the information they provide about processes, events, and interactions among people and the environment. Natural and cultural objects and their associated records provide baseline data, serving as scientific and historical documentation of the park's resources and purpose."

The Park's museum collections are comprised of historic and archeological artifacts and objects, biological specimens, geologic samples, archival materials, and library collections. Archival and library collections at the individual network Park's will continue to be stored at their respective Park.

Great Smoky Mountains National Park collections are managed separately. Biological and geological specimens are currently housed and permanently stored at the state-of-the-art Twin Creeks Science Center. Cultural museum collections, including historic and archeological artifacts and objects, archival records, and library holdings are housed at several different facilities; including the Sugarlands Visitor Center, the Office of

environmentally damaging, less expensive or more feasible options, or has too great an environmental impact. This section describes those alternatives or management tools that were eliminated from further consideration and the basis for excluding them from analysis in this EA/plan.

No Action Alternative

The No Action Alternative is presented as a requirement of the National Environmental Policy Act, (NEPA) and is the baseline condition with which proposed activities are compared. Under the No Action Alternative there would be no changes made to the housing of the Parks' cultural museum collections. Existing facilities would be used and there would be no change in staffing or in the care and preservation of cultural museum collections. While the No Action Alternative would preserve existing conditions, it would not be considered the Preferred/ Environmentally Preferred Alternative because it would not improve the efficiency of park operations and would not meet the responsibilities of the park for the long-term care and curation of museum collections.

Alternatives Considered but Dismissed from Detailed Analysis in the EA

Section 4.5(E)(6) of the NPS NEPA Guidelines (NPS 2001c), states that reasons to eliminate an alternative as infeasible include technical infeasibility, inability to meet project objectives or resolve need, conflicts with plans, policies or laws "such that a major change" would be needed to implement, and duplication with other, less environmentally damaging, less expensive or more feasible options, or has too great an environmental impact. This section describes those alternatives or management tools that were eliminated from further consideration and the basis for excluding them from analysis in this EA/plan.

GRSM considered, but dismissed, leasing off-site buildings. GRSM conducted a real estate review of the greater Smoky Mountain area to determine if buildings would be available that could meet the current needs of a curatorial facility. No existing structures or new developments were identified that would meet the specialized storage requirements necessary to properly care for the museum collections. The collections are currently being stored in a leased facility that does not meet current museum standards. Because no suitable facilities were identified that could meet the current museum standards and the current leased building does not meet museum standards, this alternative was removed from further analysis.

Various locations for the JCCF were considered, but dismissed from further analysis. These included locations within and outside of the present park boundaries. Alternative sites within the Park were eliminated from further consideration because of the environmental disturbance, the infrastructure requirements, and the cost. These alternate locations were removed from further analysis in the EA.

GRSM considered construction of the Joint Curatorial Collections Facility at a location other than the Townsend Heritage site. However, other sites would occur on lands that would require a purchase agreement or long term lease agreement. The Great Smoky Mountain Heritage Center lands would be donated to the Park for this specified use. The location is already disturbed and would result in fewer impacts to archeological resources, vegetative resources and wildlife habitat.

In total, GRSM considered several alternative facility designs that have included different collections storage layouts, building features, orientations, and parking configurations. A design charette was held in May, 2010. Four preliminary designs were presented and examined that could meet the purpose of the network parks' collections storage needs. These designs varied in size and scope and included various building sizes, outlays, amenities, aesthetics, and costs associated with their construction and maintenance. The four design alternatives were evaluated in July 2010 which led to a composite design that was selected to move forward in the design and development

administered by the U.S. Green Building Council, a Washington D.C.-based, nonprofit coalition of building industry leaders -- is designed to promote design and construction practices that reduce the negative environmental impacts of buildings and improve occupant health and well-being.

The Environmentally Preferred Alternative is Alternative B (Build Alternative). The Environmentally Preferred Alternative would help NPS Staff meet the responsibilities of the park for protecting park resources, particularly for the long-term care and curation of museum collections. The JCCF will be located outside of the present Park boundaries and within an existing urban environment and within an existing graveled parking area. The Environmentally Preferred Alternative also improves the efficiency of park operations related to the management of cultural resources.

THE PREFERRED ALTERNATIVE AND SIGNIFICANCE CRITERIA

The Preferred Alternative is also considered the Environmentally Preferred Alternative for the purposes of this project and is defined in the Environmental Assessment (EA) as Alternative B (Build Alternative). As defined in 40 CFR Section 1508.27, significance is determined by examining both the context and the intensity of the action. As defined, significance is determined by examining the following criteria:

Impacts that may be both beneficial and adverse. A significant effect may exist even if the Federal agency believes that on balance the effect will be beneficial.

Minor adverse impacts of the Preferred Alternative include temporary (limited to the duration of construction) increases in dispersed dust and exhaust emissions caused by truck traffic and equipment activity. Although some soils and vegetation would be affected, adhering to proper construction techniques and precautions will mitigate the possible spread of noxious weeds during construction. Appropriate erosion control devices will be used during construction to control runoff. Some minor, localized, and short term displacement of wildlife could occur during construction activities, but animals would be expected to return to the general area. Some short term and minor visitor inconvenience (traffic flow) will occur during construction.

The degree to which the action affects public health or safety

The Preferred Alternative will have no impact on public health or safety. Wastewater treatment services would be provided through the installation of an onsite septic system. Precipitation that falls on the building and other impervious surfaces, which could contain pollutants such as hydrocarbons and heavy metals from vehicles, would be diverted to existing drainage systems. All chemicals used in the facility would be properly stored or disposed of so as not to pose a threat to water quality. A spill response plan will be developed and followed during construction, in the event that fuel or solvents needed for construction are spilled. No hazmat materials will be stored on-site during construction.

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

The site is currently a graveled parking area. No archeological resources, cultural landscapes, or ethnographic resources will be impacted by this alternative. The soil types in the area provide limited support for prime and unique farmland. The site proposed for the JCCF is currently fallow land. Wild and scenic rivers have not been designated within GRSM boundaries. No wetlands or ecologically critical areas are designated in the JCCF construction site. The Little River loses its Outstanding National Resource Waters (ONRW) outside of the park boundaries and is considered exceptional water in the area surrounding the proposed JCCF site.

As described in the EA, the construction of the JCCF is not related to other actions with individually insignificant but cumulatively significant impacts.

The degree to which the action may adversely affect items listed or eligible for listing in the National Register of Historic Places (NRHP), or other significant scientific, cultural, or historic resources

No significant archeological sites and/or features, historic structures, cultural landscapes, cemeteries, or other commemorative properties were identified in the JCCF construction site area.

Previous archeological site monitoring was done by Tennessee State Archeologist Nick Fielder during construction of the Great Smoky Mountain Heritage Center (personal communication 02/09/2011). No formal report was generated; however, Mr. Fielder indicated the area was not conducive to the presence of intact archeological deposits and/or site features. The depositional environment over the JCCF site is immediately adjacent to and similar to that identified for the Great Smoky Mountain Heritage Center and it is likely that no intact archeological deposits and/or features are present.

The construction site does not contain historic structures eligible for listing in the National Register of Historic Places (NRHP). The GSMHC buildings are representative of various time periods, illustrate different architectural styles and construction techniques, and are associated with different activities, events, and or people. The buildings as a whole represent a modern (post 2004) artificial grouping of buildings that have been created for the purposes of interpretation, protection, and/or maintenance. Together they do not form a cohesive district, but rather comprise an artificial assemblage of vernacular buildings and structures whose setting is neither comparable to their varied historic locations nor compatible with the potential significance of each of the individual buildings and structures. As moved properties, these resources do not satisfy Criteria Consideration B either individually or collectively, and are considered ineligible for listing in the NRHP.

No NRHP eligible cultural landscapes are identified in this area. The topography, vegetation, circulation features, spatial organization, or land use patterns of the site's adjacent landscape are common urban elements and not significant.

No cemeteries or other areas of commemoration occur on the proposed site location.

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

The Preferred Alternative will not have an impact on any threatened and endangered species. U.S. Fish and Wildlife Service concurred that the project is not likely to adversely affect any listed species.

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

As described above, the preferred alternative does not constitute an action meeting the criteria that normally require preparation of an environmental impact statement (EIS). The preferred alternative will not have a significant effect on the human environment. Environmental impacts that could occur are limited in context and intensity, with generally adverse impacts being negligible to minor during construction and negligible in the long-term. There are no unmitigated adverse effects on public health, public safety, threatened or endangered species, sites or districts listed in or eligible for listing in the National Register of Historic Places, or other unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified. Implementation of the action will not violate any federal, state, or local environmental protection law.

APPENDIX A

NON-IMPAIRMENT DETERMINATION

NPS *Management Policies 2006*, Section 1.4.4, explains the prohibition on impairment of park resources and values:

While Congress has given the Service the management discretion to allow impacts within parks, that discretion is limited by the statutory requirement (generally enforceable by the federal courts) that the Park Service must leave park resources and values unimpaired unless a particular law directly and specifically provides otherwise. This, the cornerstone of the Organic Act, establishes the primary responsibility of the National Park Service. It ensures that park resources and values will continue to exist in a condition that will allow the American people to have present and future opportunities for enjoyment of them.

NPS *Management Policies 2006*, Section 1.4.5, *What Constitutes Impairment of Park Resources and Values*, and Section 1.4.6, *What Constitutes Park Resources and Values*, provide an explanation of impairment.

Impairment is an impact that, in the professional judgment of the responsible National Park Service manager, would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values.

Section 1.4.5 of *Management Policies 2006* states:

An impact on any park resource or value may, but does not necessarily, constitute impairment. An impact would be more likely to constitute impairment to the extent that it affects a resource or value whose conservation is: Necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park. Key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or Identified as a goal in the park's general management plan or other relevant NPS planning documents as being of significance. An impact would be less likely to constitute impairment if it is an unavoidable result of an action necessary to preserve or restore the integrity of park resources or values and it cannot be further mitigated. Per Section 1.4.6 of *Management Policies 2006*, park resources and values that may be impaired include:

- the park's scenery, natural and historic objects, and wildlife, and the processes and condition that sustain them, including, to the extent present in the park: the ecological, biological, and physical processes that created the park and continue to act upon it; scenic features; natural visibility, both in daytime and at night; natural landscapes; natural soundscapes and smells; water and air resources; soils; geological resources; paleontological resources; archeological resources; cultural landscapes; ethnographic resources; historic and prehistoric sites, structure, and objects; museum collections; and native plants and animals;
- appropriate opportunities to experience enjoyment of the above resources, to the extent that can be done without impairing them;
- the park's role in contributing to the national dignity, the high public value and integrity, and the superlative environmental quality of the national park system, and the benefit and inspiration provided to the American people by the national park system; and
- any additional attributes encompassed by the specific values and purposes for which the park was established.

APPENDIX B
Agency
Correspondence



IN REPLY REFER TO:

United States Department of the Interior

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



AUG 30 2011

D6215 (GRSM)

RECEIVED SEP 06 2011

Dr. Jeffrey J. Crow
State Historic Preservation Officer
Division of Archives and History
4610 Mail Service Center
Raleigh, North Carolina 27699-4610

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.

Lisa C. Sledge, Tribal NAGPRA POC Date 9-23-11

Dear Dr. Crow:

In compliance with Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations, Great Smoky Mountains National Park has enclosed a draft copy of "Joint Curatorial Collections Facility Environmental Assessment" for your review.

Consistent with 36CFR800.8(c), Great Smoky Mountains National Park (GRSM) is using the National Environmental Policy Act (NEPA) process to meet its obligations under Section 106 of the NHPA. A letter expressing our intent was sent to the North Carolina State Historic Preservation Office (NC SHPO), the Tennessee State Historical Preservation Office (TN SHPO) and the Eastern Band of Cherokee Indians Tribal Historic Preservation Office (THPO) on January 14, 2011.

GRSM is proposing the construction of a permanent curatorial facility to include a storage facility, library, research center, and curatorial staff offices for GRSM and several east Tennessee National Park Service units. GRSM has been in ongoing discussions with Andrew Johnson National Historic Site, Big South Fork National River and Recreation Area, Cumberland Gap National Historical Park and Obed Wild and Scenic River in the development of a facility to promote the consolidation of historical collections into a multi-park facility.

In preparation, GRSM has prepared an Environmental Assessment (EA) to examine several alternatives for the proper care and stewardship of National Park Service museum collections across east Tennessee.

GRSM is requesting your office review the Joint Curatorial Collections Facility (JCCF) Environmental Assessment and provide our office with any comments and or concerns. These comments will be addressed in the preparation of the final environmental



"Roger McCoy" <Roger.McCoy@tn.gov>
08/03/2011 10:24 AM To <Janet_Rock@nps.gov>
cc <Jeff_Troutman@nps.gov>, <Keith_Langdon@nps.gov>
bcc

Subject Re: review

Janet:

Using the Tennessee Natural Heritage Program's rare species database, I've reviewed the proposed Joint Curatorial Collection Facility at Great Smoky Mountains National Park. Given the project's proximity to the National Park and Little River, we know of a number of state listed species from the area. However, the site in question does not possess any known rare species and given the current land-use at the site and surrounding properties (as shown on recent satellite imagery), the planned project would not impact any rare species or high-quality plant communities.

Thank you for consulting with our program on this project and let me know if I can be of further assistance.

Sincerely,

Roger

Roger McCoy
Tennessee Natural Heritage Program
401 Church St., 7th Floor L&C Tower
Nashville, Tennessee 37243-0447
roger.mccoy@tn.gov
phone: 615-532-0437
fax: 615-532-3019

RESPONSE: This facility is designed to be a controlled access facility. Visits to the new Joint Curatorial Collections Facility will be scheduled in advance and in coordination with the staffing and parking availability. Design of JCCF includes approximately ten parking spaces. Parking will accommodate parking for three staff members who will be on-site on weekdays and will accommodate several visitor and researchers parking needs. It is anticipated that no more than one or two cars will be visiting the facility at a time. The peak times for tubing occur on the summer weekends and this facility will not be operational during

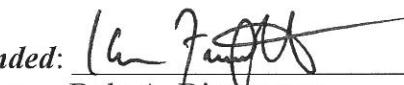
**FINDING OF NO SIGNIFICANT IMPACT
FOR THE CONSTRUCTION OF THE
JOINT CURATORIAL COLLECTIONS FACILITY
GREAT SMOKY MOUNTAINS NATIONAL PARK
-ENVIRONMENTAL ASSESSMENT-**

GREAT SMOKY MOUNTAINS NATIONAL PARK
Gatlinburg, Tennessee

The Preferred Alternative does not constitute an action that normally requires preparation of an Environmental Impact Statement (EIS) in accordance with the regulations issued by the Council on Environmental Quality. The Preferred Alternative will not have a significant effect on the human environment. Environmental impacts that could occur are negligible or minor in intensity. There are no significant impacts on public health, public safety, threatened or endangered species, sites or districts listed in or eligible for listing in the National Register of Historic Places, or other unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified. Implementation of the action will not violate any Federal, State, or local environmental protection law.

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

Recommended:



 Dale A. Ditmanson
Superintendent, Great Smoky Mountains National Park

1-27-12

Date

Approved:



 David Vela
Regional Director, National Park Service, Southeast Region

2/9/12

Date