



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



November 30, 2006

James Fyke, Commissioner
Tennessee Department of Environment and Conservation
410 Church Street
L & C Tower, 21st Floor
Nashville, TN 37243-0435

Dear Commissioner Fyke:

Enclosed are the Park's responses to the Tennessee State Historic Preservation Office's August 23, 2006, letter regarding Section 106 of the National Historic Preservation Act for treatment of historic properties within the Elkmont Historic District within Great Smoky Mountains National Park.

In addition to these responses, I request a meeting with the State Historic Preservation Office staff to review and discuss the Park responses, review the draft Area of Potential Affect (APE) overlays for all alternatives that will be provided at the proposed meeting, and further resolve any questions generated from these responses. I propose a meeting in Nashville on any of the following dates: January 22, 25, 26, 29 or 31, 2007, depending on your staffs' schedules. Please contact Debbie Huskey at 865-436-1203 to confirm a meeting date.

Sincerely,

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Dale A. Ditmanson
Superintendent

cc:
Tune, Richard - SHPO
Garrison, Joseph - SHPO
Stagar, Claudette - SHPO
Barnett, Jennifer - SHPO
Catlin, Martha - ACHP
Townsend, Russ - THPO - ECBI
Nail, Giny - THPO - Chickasaw
Tinker, Nancy - NTHP
Harrington, Michael - SMHK
Faust, Lynn - EPC
Kidd, Gregg - NPCA
Snyder, Ted - Sierra Club

Enclosure

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SHPO Comments and Park Responses

Documentation Requirements:

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

A description of the Area of Potential Effects (APE), including a graphical representation of the APE is provided on pages 166-168 of the DEIS. Photographs, maps and drawings have been included throughout the DEIS and supplementary documents, all of which have been provided to the Tennessee SHPO, and are referenced on page 124, Section 3.1 of the DEIS and were included on the project website.

However, as a result of the request at the consulting parties meeting, the Park will prepare individual APEs for each alternative that will graphically overlay the following: the historic district boundary, visual APEs, cultural and natural resources that can be mapped and the immediate geographic surrounding of this specific study area for review by all consulting parties as part of ongoing Section 106 consultation. The four factors used in the CBA process will not be included.

There appears to be confusion about the use of Choosing By Advantages (CBA) and the role this process plays in the identification of an agency preferred alternative. CBA is an internal decision-making process the National Park Service uses for identifying an agency preferred alternative, not a process for determining the area of potential effects for each alternative. The Park followed the approach outlined in the book, The Choosing By Advantages Decision-making System, by Jim Suhr. With the exception of certain cultural and natural resources that can be mapped, the factors and attributes used (Cultural Resources, Natural Resources, Visitor Education and Enjoyment, and Public Health, Safety and Welfare) in the CBA decision-making process are not graphical in nature and therefore are not elements that can be included in a map format. The Park first identified potential effects prior to employing the CBA decision-making process as part of the rigorous impact analysis conducted within the EIS process. The interdisciplinary decision-making process was conducted as a team effort and considered the total impacts to all resources when identifying the preferred alternative. A summary of the CBA decision-making process is included in the DEIS (page 314-315) and the full decision-making process which will include the section 106 consultation will be included in the Record of Decision. If there are further questions by the SHPO's office pertaining to the process used, Park staff will be happy to discuss them as part of the requested meeting in January, 2007.

Letters from Federal and State Government Agencies

An explanation of why the criteria of adverse effect were found applicable or inapplicable, including any conditions or future actions to avoid, minimize or mitigate adverse effects. We feel that this condition has not been met satisfactorily.

Regulations defined in 36 CFR § 800.5 (2) state the following in regard to identifying adverse effects:

Examples of adverse effects; Adverse effects on historic properties include, but are not limited to:

(i) Physical destruction of or damage to all or part of the property;

The DEIS describes in Chapter 4 the specific buildings that contribute to the character of the district that would be adversely effected as a result of removal or physical destruction.

(ii) Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access, that is not consistent with the Secretary's Standards for the Treatment of Historic Properties (36 CFR part 68) and applicable guidelines;

All alterations to properties that would be retained, including preservation, restoration, rehabilitation and reconstruction proposed in Chapter 2 of the DEIS, would follow the guidelines outlined in the Secretary of the Interior's Standards for the Treatment of Historic Properties, and each treatment option is described in the DEIS.

(iii) Removal of the property from its historic location;

At this point in the process, no property has been proposed for removal from its historic location.

(iv) Change of the character of the property's use or of physical features within the property's setting that contributes to its historic significance;

No change of character to the property's use or to any of the physical features within the property's setting that contribute to its historic significance have been proposed under any alternative. Increased use under alternatives that propose overnight rental to the general public may create additional wear and tear on certain properties and this has been documented in the DEIS.

(v) Introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features;

The introduction of new parking areas in disturbed, non-contributing sites and the formal designation and improvements to existing parking areas at trailheads and at within the historic district have been identified. The proposed visual screening of these introduced elements, for purposes of mitigation, are described in the DEIS (page 82).

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(vi) Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization; and

Between 1994 and 1998, the Park planned to implement the General Management Plan decision which called for the removal of all buildings at Elkmont. Limited Park funds were not used to maintain buildings within the Elkmont Historic District that were slated for removal. Beginning in 1998, stabilization and preservation efforts were begun as Park planning changed to consider retaining buildings within the historic district. Buildings were maintained as funding was made available and is described in the DEIS. Deterioration of at least three buildings was significant dating back to the years prior to 1992 when the Park took full possession of Elkmont buildings. Despite stabilization efforts taken in recent years, and due to extreme deterioration to the point of collapse, these buildings cannot be preserved.

(vii) Transfer, lease, or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.

There are no proposals to transfer, lease or sell property out of Federal ownership or control under any alternative.

We request that the NPS propose and diligently examine alternatives that would avoid all adverse effects to historic properties.

The Park explored options to avoid adverse effects to historic properties to the maximum extent possible when developing and assessing the effects of Alternative F2. Alternative F2 represents the maximum avoidance of adverse effects to historic properties within the Elkmont Historic District. The Park considered an alternative that would result in a complete avoidance of adverse effects to historic properties in the historic district and considered the degree to which it was possible, but such an alternative was not considered reasonable or feasible.

An alternative that would result in the complete avoidance of adverse effects (“alternatives that would avoid all adverse effects”) would entail at a minimum, preservation and stabilization of all contributing buildings in the district in accordance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties*. Additional treatments, also carried out in accordance with the *Secretary's Standards*, could consist of restoring the exteriors of all contributing buildings to accurately reflect their appearance during the district's period of significance, and rehabilitation of selected buildings for potential adaptive use. In consideration of the poor condition of many of the buildings, and the exorbitant costs for which there is no funding source, rehabilitation would likely require considerable structural intervention to bring them into compliance with approved safety and use standards. This raises the concern that the district's buildings could sustain a loss of historical integrity if unacceptable alteration or replacement of historic fabric would be required to carry out rehabilitation.

The primary problem with a complete avoidance of adverse effects alternative is that three cabins listed as contributing elements have collapsed and no longer maintain historic integrity because they no longer retain the basic design features that convey their historic appearance or function. The SHPO has been aware of the condition of these buildings since the beginning of the process and agreed early on in the process that upon reaching a final management decision, any buildings that no longer maintain integrity would be de-listed. Until then, it is technically impossible to realistically consider a complete avoidance alternative, because an adverse effect has already occurred to the extent that the buildings cannot be saved.

A possible consideration for returning all contributing buildings and structures in the district to their historical appearance would be to reconstruct Cabin #36, the Wonderland Hotel, and one outbuilding that served as an automobile garage for Cabin #45. National Park Service Director's Order #28, Cultural Resource Management Guidelines, directs National Park Service sites that "Reconstruction of an entire structure is always a last-resort measure for addressing a management objective and will be undertaken only upon specific written approval of the director after policy review in the Washington office". Additionally, the NPS in agreement with the Tennessee SHPO, does not consider reconstruction a true preservation treatment, but rather interpretation acceptable only when (a) it is essential for public understanding of the cultural associations of a park established for that purpose, (b) the structure can be built at full scale on the original site with minimal conjecture, and (c) significant archeological resources will be preserved in situ or their research values will be realized through data recovery.

Complete avoidance of adverse effects would also entail elimination of all parking areas in the district because such development would intrude on the district's historic setting. Elimination of all parking in the district is unrealistic because automobile access is the primary mode of transportation for visitors to the Park. An alternative method of providing a shuttle service from an offsite location to Elkmont to eliminate the need for onsite parking areas was considered and dismissed due to high costs, logistics, and practicality.

Therefore Alternative F has been identified as the maximum avoidance of adverse effects alternative because a complete avoidance of adverse effects alternative is not feasible.

In addition, the overall management objective for the Park, as stated in the 1982 GMP, 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." Additionally, the stated goals and objectives for this specific project, reviewed and commented on by the public as part of the formal scoping phase of the planning process, are 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

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- Protecting and perpetuating the tangible (archeological sites, and historic buildings 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.

Neither a complete avoidance nor the maximum avoidance alternative meets the Park or Project stated goals and objectives because it focuses almost solely on cultural resources at the expense and loss of other resource values.

Consultation:

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

The Park did propose and evaluate alternatives that will avoid all adverse effect to the historic properties contained within the Elkmont Historic District. An alternative that avoided all adverse effects to historic properties was proposed, but was considered and dismissed because it is not reasonable or feasible. Please refer to Park response to the previous SHPO question/request on pages 4 - 6 of this response.

Propose and evaluate alternatives that would minimize adverse project effect to Elkmont Historic District. "As stated earlier, we [TN SHPO] believe that in view of the substantive amount of public comment, very little of which was favorable to Alternative C, as well as comments by consulting parties, the NPS may want to reconsider its preferred alternative before moving to a Final Environmental Impact Statement".

Potential mitigation due to the adverse effect of the agency preferred alternative C that can be considered for the purposes of section 106 consultation are constrained by the following:

- Proposed mitigation can not introduce new uses that were not considered by the public in the DEIS for the agency preferred alternative C without going back out to the public with a new draft document for review and comment. The Park is opposed to having to issue a new DEIS for public review and comment.
- Proposed mitigation can include the retention of additional contributing buildings (beyond Cabin #42 as indicated in the DEIS) as long as they were analyzed in other alternatives, do not violate law or NPS policy, do not duplicate an already existing alternative, and meet the project objectives. The Park is open to making adjustments to the agency preferred alternative based on mitigation needs. Changes to the Agency Preferred Alternative C, that proposed the retention of nineteen buildings, would be constrained somewhere between Alternative B, that proposes retention of thirteen buildings and Alternative D1, that proposes the retention of twenty-five buildings.
- Simply not favoring the preferred alternative is not grounds for reconsidering it and does not take into consideration all of the constituency groups and their positions which includes support for the agency preferred alternative, full removal of all buildings at Elkmont, and preservation of all buildings at Elkmont.

Letters from Federal and State Government Agencies

As part of ongoing consultation, the Park anticipates discussing in full, with the Tennessee SHPO, methods to minimize adverse effects to the district and greatly appreciates suggestions and input the SHPO will provide regarding this topic.

Appendix A provides a listing of minimization options for each alternative including the Agency Preferred Alternative C.

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

We will respond to consulting party questions received as a result of the July 20th Consulting Parties meeting as part of Section 106 consultation. The Park received one written request from a consulting party member in addition to the SHPO request and will respond to that request separately.

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

The Park requested that Consulting Party members submit in writing to the Park substantive questions raised during the meeting. The Park received a list of those substantive questions from the SHPO and one other consulting party member. The Park is responding to those questions in this document and through continued consultation.

SHPO Questions

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

The NPS did consider and evaluate a complete avoidance of adverse effects alternative. The analysis indicates that a complete avoidance alternative is not reasonable or feasible and therefore the alternative that offers the maximum avoidance of adverse effect remains Alternative F2. Alternative F2 though, does not meet the full range of project goals and objectives and because of the major adverse effect to other resource considerations at Elkmont, was not selected as the agency preferred alternative. Please refer to the Park response to SHPO question/request under “Documentation Requirements (5)”. Additionally, pages 105-112 and 356-375 in the DEIS provides a full description of this alternative and the associated effects to historic properties.

2. NPS prioritization of project effects: Did the NPS prioritize the relative effects of each Alternative on each of the different resource variables and considerations listed in Table 4-13 of the DEIS?

The Park examined each project alternative individually regarding all of the listed impact topics. The Park did not “prioritize the relative effects of each Alternative on each of the

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different resource variables and considerations” but rather considered all effects based on the impact threshold definitions listed in Table 4-1 and summarized each impact in matrix format in Table 4-13.

Did the NPS use the Choosing By Advantages process to prioritize project effects?

CBA is an internal decision-making process, not an impact analysis process. The Park did not use the CBA process to prioritize project effects but rather used the identified impacts analyzed under each impact topic in the DEIS to inform decision-making in the CBA process.

Did the NPS matrix a priority list from highest to lowest level of effect for each alternative? Could the NPS do so and share that redrafted prioritization matrix with us?

The Park did not matrix a priority list from highest to lowest level of effect for each alternative as part of the EIS but did identify the relative impacts or effects of each topic based on the individual alternative and this analysis has been included in the DEIS. A prioritization matrix is not part of this process and drafting such a matrix for this planning effort would be inaccurate and misleading given the range of impact topics. A color coded system based on relative impact by impact topic under each alternative may help to illustrate the overall impacts of all alternatives relative to one another. The Park will provide this additional illustration in Table 4-13 to better portray the total impacts of all alternatives, however, the Park again emphasizes that impacts have not been prioritized, but rather considered collectively in identifying the environmentally preferred alternative.

Will the NPS distribute copies of its Choosing By Advantages document to all consulting parties since none were distributed during the consulting parties meeting held on July 20? The DEIS states that this document formed the basis of the Park Service’s decision making relative to selecting Alternative C as the Preferred Alternative. Right now, the NPS’s stated rationale for choosing Alternative C in the environmental document is that it “balances protection of cultural and natural resources.” We feel that a prioritization matrix carried in the CBA document that would justify this assertion is missing from the environmental document and would be helpful to have. It appears that the NPS’s selection of Alternative C as the preferred alternative is based more on the CBA process than on the impacts and advantages described in the DEIS. It is possible that our examination of the CBA document and the prioritization process will generate additional questions about the assumptions and methodologies underlying it.

Under the CBA process, each of the four factors, (cultural resources, natural resources, visitor education and enjoyment, and health, safety and welfare) were applied and the seven project alternatives were given a numerical value based on the relative advantage of each alternative through the consensus of the interdisciplinary decision-making team. The collective advantages of all factors were tabulated and then measured against a cost/benefit analysis to identify Alternative C as the agency preferred alternative. (See Appendix B that includes the charts and summary information presented at the consulting parties meeting) A summary of the comparison of alternatives was included in the DEIS and in the Summary Document of the DEIS (Page S-13). Identification of an agency

preferred alternative was the results of an interdisciplinary decision-making process. The Park will further discuss as part of ongoing consultation, ways to avoid, minimize and mitigate adverse effects on historic properties on the identified preferred alternative as a final decision has yet to be made and adjustments to the preferred alternative are within the scope of this EIS process.

3. Comments from the Tribes: Please share the review comments of the Federally recognized tribes with respect to the DEIS.

NPS has consulted with Tribes throughout this process and no comments were received from any Tribes on the Draft Environmental Impact Statement. NPS will continue consultation with Tribes as part of this planning process.

4. NPS internal policies: It appears that much of the decision-making regarding the selection of Alternative C as the NPS's preferred alternative resulted from various NPS internal policies. For example, could the NPS provide additional discussion of the Section 106 implications of "Special Use Permits" since these are included as part of Alternative C for the Appalachian Club?

A Special Use Permit for the Appalachian Clubhouse would allow use at this social hall to be reestablished as part of this building's originally intended function and would be open to all members of the public who come to visit Great Smoky Mountains National Park and wish to use this facility. The adaptive reuse of a historic structure would be except from further section 106 consultation. The adaptive reuse of the building would be managed through the NPS Special Use Permit authority. Construction details of the proposed rehabilitation are subject to further Section 106 consultation.

"Park Operations", "Visitor Experience", "Sustainability", "Balancing Natural and Cultural Resources", and "Visitor Carrying Capacity" seem to be dominant drivers for NPS deciding on Alternative C as the preferred Alternative. These elements of prioritization are mentioned specific to each Alternative presented in the DEIS. Could the NPS elaborate on how these various elements interrelated within the DEIS process and influenced its outcome? Did the DEIS process change the NPS's thinking concerning the relative weight of any of these elements?

The NPS evaluated each individual alternative relative to all impact topics and provided an analysis of the relative impact as beneficial, negligible, and adverse and the relative intensity of each. The list of impact topics within the DEIS were considered and evaluated equally. Individual resources and elements were not prioritized or weighted. The overall impacts to all resources under each alternative were assessed and considered collectively when identifying the preferred alternative.

5. Concessionaires: Possible concessionaire interest in Elkmont would seem to be a legitimate driver for increased cabin retention and use. What due diligence was done to identify potential concessionaires?

The DEIS is a part of the planning process to determine whether there are visitor services that are necessary and appropriate to provide for the use and enjoyment of the Park area and whether a concession contract is the appropriate way to provide these services. These

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uses were identified and included in alternatives E and F. The development and issuance of a prospectus would not occur until after the approval of the final EIS. For these reasons, the NPS has not made an effort to identify potential concessionaires. The NPS has noted the interest of more than one party who has approached the NPS to express an interest in concession services at Elkmont and will notify these parties if a prospectus were justified.

Prior to entering into a competitive selection process, the NPS must first determine that the desired accommodations, facilities, and services meet the requirements established by law, regulation, and policy. If it is determined that a concession contract meets these requirements, a prospectus is developed to solicit proposals from offerors for the concession contract. Potential concessioners are identified by issuing the prospectus and publishing notices to inform the public that the NPS is seeking offers for a concession contract. The NPS is required to publish a formal notice in Fed Biz Ops, an internet web site that publishes notices of Federal business opportunities. The NPS may also advertise prospectuses by other means, including publishing other notices on the internet or in the print media. The contents of the prospectus are not released to the general public or potential offerors until the prospectus is issued and this document becomes public information. Since the NPS may not do anything that would suggest a preference for any particular offeror, it is inappropriate for the NPS to actively contact potential offerors prior to issuance of a prospectus. However, the NPS does maintain a list of parties who have contacted the NPS to express an interest in particular concession contracts. The NPS will send these individuals a notice when a prospectus is issued for a concession contract in which the party has expressed an interest.

We presume that a potential concessionaire would share revenue with NPS for renting its cabins, but there seems to be no financial cost/benefit analysis for concessionaire use of Elkmont cabins.

The Historic Properties Management Analysis completed by Lodging Resources, Inc. did estimate the costs, revenue, and franchise fee payments for several alternatives that included overnight lodging. The capital improvement costs of developing concession facilities far exceeded the profitability of the concession operation. The analysis indicated that if capital improvements were funded by the National Park Service, once adjustments were made for personal property reserves, management fees, taxes, working capital, and lodging rates variances, the concessionaire would have a marginal opportunity to make a profit and pay a minimal franchise fee to the National Park Service.

We are especially concerned about the NPS's apparent rejection of the use of concessionaire partnerships during their Choosing by Advantages process based on internal NPS policies, although the NPS stresses the need for such partnerships in other policies.

In order for the NPS to enter into a partnership with a concessioner, the NPS must first develop a concession contract that meets all of the requirements of law, regulation, and policy. If the NPS cannot develop a concession contract that meets all of these requirements, there can be no partnership with a concessioner to provide commercial services. The CBA process did not reject concessioner partnerships. The CBA process identified advantages and problems specific to the public use of Elkmont buildings,

regardless of who would service and run such an operation.

It is not at all clear why the NPS decided that concessionaire operations at Elkmont were not “necessary and appropriate” particularly in view of similar lodging concessions in other Parks.

In determining whether concession services are necessary and appropriate, the NPS reviews the particular circumstances of a park in relation to law, policy, various planning documents, and other pertinent information. While the law and regulations related to concessions contracts generally apply to all parks, the enabling legislation for parks is not the same. In some cases, a park's enabling legislation may include language that affects the necessary and appropriate determination. The enabling legislation for this Park does not specifically address concession services. Parks have unique planning documents such as the General Management Plan that help to guide the necessary and appropriate determination. In the case of this Park, the General Management Plan includes a very clear statement that concession services will be limited in fulfilling visitor needs that cannot be met or would be inefficiently met by other sources. The proximity and availability of commercial services to visitor use areas of the Park is different for each park and these factors change over time. In many cases, the determination that concession services are necessary and appropriate was made prior to the establishment of current law and policy governing concession services. These decisions also may have been made at a time when adequate commercial services did not exist outside the park in proximity to visitor use areas of the park. While law and policy provide guidance regarding the determination of necessary and appropriate, there is no precise formula for making this determination. In each case, the NPS exercises due diligence to make a sound, defensible decision based on law, policy, planning documents, and other pertinent information. However, in the absence of a rigid formula for making these decisions, each determination must be judged on its own merits and cannot be compared with decisions made for other parks.

The DEIS lists some of the factors that were considered in determining that the concession services proposed in Alternatives E and F are not necessary and appropriate. This explanation can be found on pages 28-30, 345-355 and 375.

In view of the decisive nature of the cost considerations in the CBA process as described at the meeting, the failure to consider the possibility of revenues to offset costs appears to seriously bias the outcome of the prioritization process.

The possibility of revenues was considered in the analysis. However, potential revenues did not have a significant impact on offsetting the very substantial capital improvement and NPS operating costs associated with the concession alternatives.

6. NPS evaluation of associated costs: We need more information concerning the NPS's cost evaluations of various alternatives. How were the cost figures arrived at and are they valid and consistent?

Appendix C in the DEIS provides detailed information on how cost figures were arrived at.

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Cost estimates used in this analysis are just that, estimates, and these estimates are consistent with National Park Service guidelines and practice.

We understand that, according to the CBA process, Alternative D was the original preferred alternative, yet it was rejected by the NPS in favor of Alternative C because of the associated costs of the two alternatives. How did NPS determine that the cost would increase from approximately \$7m to approximately \$20m between alternatives C and D? The cost figures lower considerably if the NPS removes the Wonderland Hotel reconstruction from Alternatives D, E and F. How was this factored into the decision making process?

Please refer to the comprehensive and detailed cost breakdown provided in Appendix C of the DEIS that fully documents the cost difference between Alternatives C and D. Alternatives D, E and F were considered with the full reconstruction option as part of the CBA process. The decision-making team considered Alternatives D, E and F without the hotel in the initial analysis of all alternatives in the CBA process and determined that the full build option should be considered for practicality and because the full build option in each of these alternatives offered the fullest description of each alternative. The financial advantages of implementing Alternative C are two-fold. First, the actual cost of Alternative C is less than alternatives that call for additional buildings to be retained, and second, when considering the cost/benefit analysis conducted in the CBA process, Alternative C collectively provided the greatest amount of gain across the four factors: natural resources, cultural resources, visitor education and experience, and health, safety and welfare, for the associated cost.

The results of the decision would not change, because, when applying the cost/benefit analysis to Alternatives D, E and F, these alternatives still cost more than Alternative C, with or without the hotel and annex. Additionally, the relative advantage of Alternatives D, E and F would also decrease without the hotel complex as these buildings contributed substantial weight to the advantages of these alternatives, especially under the Cultural Resources and Visitor Education and Experience factors.

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

Currently there are no NPS-generated or other funds being spent that can be saved and allotted for use in implementing Alternative C. Funding for implementing the final decision for Elkmont will come from an independent funding call when the Record of Decision is signed. The sooner the Park can arrive at a final decision, the sooner the funding process can begin. The Park faces difficult challenges in an era of declining

budgets and maintenance backlogs to effectively carry out its diverse mission of preserving the nation's cultural and natural resource heritage, while providing for quality visitor experiences and enjoyment. The anticipated revenue generated under the Special Use Authority for day use rental in Alternative C is expected to substantially offset the estimated annual operation and maintenance costs for this alternative because this would be a Park-run operation and the majority of revenue generated would remain in the Park. Between the offset Operation and Maintenance costs based on day use rental revenues and the elimination of the costs associated with ongoing stabilization efforts, Alternative C represents a better break-even scenario compared to the existing situation.

7. Montane Alluvial Forest: The level of endangerment of the Montane Alluvial Forest by its proximity to Elkmont seems to be a special NPS issue of concern. Will the NPS discuss in greater detail the nature of that endangerment?

Please refer to pages 180 – 182 in the DEIS and in addition:

The physical presence of Elkmont buildings within the floodplain environment adjacent to the Little River creates a direct major adverse impact on the natural resources within the District. Associated activities that would be carried out as part of historic preservation measures, such as a hazard tree management plan, would also create major adverse impacts on forest resources in Elkmont due to the necessary perimeter clearing of trees around historic structures. These adverse effects combined with the increased levels of visitation within this particular sensitive environment would considerably endanger this forest resource.

Much of the ecological diversity and importance of the Elkmont Montane Alluvial Forest results from the unique structure, biota, and ecosystem processes created by this natural environment. Because they occur at the bottom of extremely steep, high gradient upland drainages, montane floodplains serve as collection points for soil and other material deposited as a result of water flow and gravity. The resulting deep soils are typically rich in nutrients and organic matter and may contain multiple buried soil horizons. The flood cycle of rivers results in a diverse patchwork of habitats. Within a mile stretch of these forests, one may encounter rich areas of deposited soil and debris teaming with invertebrates and fungi, scoured areas that provide important habitat to rare species, and small depression pools that are intermittently flooded and provide important habitat for breeding amphibians.

Alliance is the second finest level of ecological community classification. According to The Nature Conservancy, the alliance found at Elkmont “suggests a higher elevation variant that is compositionally different from alluvial forests found at lower elevations in the Blue Ridge, making it even rarer and more significant than the group as a whole.” The significance of this forest type has also been stated in official correspondence between the Park and the North Carolina State Department of Environment and Natural Resources, the Tennessee Department of Environment and Conservation and the University of Georgia. The Tennessee Department of Environment and Conservation (TDEC) has also identified this community type as “a higher elevation variant of the Alliance” and has expressed interest in understanding the connectivity of plant communities along the Little River. Additionally, TDEC has stated, that “For the long-term viability and functionality of this stand, it would of course be better if there was

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some opportunity for this connectivity to be restored or at least maintained at its present level” and that “even a remnant Montane Alluvial Forest which has the potential for recovery of its hydrologic processes would be a significant contribution to the conservation of biological diversity in the Southern Blue Ridge [Province].”

Can the NPS discuss the specific endangerment caused by Alternative C?

Alternative C poses no specific or direct endangerment to the floodplain forest because the majority of proposed historic preservation activities would occur outside of the community type in question. The agency preferred Alternative C takes into consideration the significance of cultural resources as well as the significance of natural resources and provides for the preservation and restoration of significant cultural resources in the core of the historic district as well as provides for the restoration of Montane Alluvial Forest. In Alternative C, 22 acres would be available for the recovery of Montane Alluvial Forest.

Will the NPS discuss the level of endangerment associated with the nearby existing campground?

Please refer to Chapter 1 of the DEIS. The campground is outside the scope of this General Management Plan (GMP) Amendment and Environmental Impact Statement. The Purpose and Need for this Environmental Impact Statement is specific to a reevaluation of the GMP in regards to the proposed removal of the formerly leased buildings at Elkmont. Any proposal for retaining buildings requires an amendment to the existing GMP, thus requiring the associated environmental compliance, in this case the EIS. The GMP does not call for any action within the campground, so an impact analysis for that area has not been conducted.

...and proposed new parking areas?

Please refer to page 378 in the DEIS. There would be no adverse effect on the area available for the recovery of Montane Alluvial Forest under alternative C as a result of new parking areas established adjacent to the Wonderland Club site, within Daisy Town and in the expanded parking lot adjacent to the Appalachian Clubhouse. The existing parking area at Little River Trailhead would be formalized and the resulting impacts to the adjacent Montane Alluvial Forest habitat are expected to be within the range of natural variation in forest disturbances.

The DEIS estimates that there are 6,590 acres of Montane Alluvial forest within the boundaries of GRSM. The gain in acreage in which this forest type could be regenerated (it apparently is very minimal in the APE at present) would appear to be only a few acres under the most liberal possible estimate, less than 1/4th of one percent of the total. Why is this small gain of such importance as to outweigh the permanent loss of significant cultural resources?

Please refer to initial response under Question #7 above, and additionally, information provided on pages 180-181 of the DEIS.

The gain and recovery of 22 acres of globally imperiled Montane Alluvial Forest at Elkmont is balanced by the gain of preserving a core area of the Historic District in perpetuity. The adverse effect to the Historic District would be mitigated as would the adverse effect to natural resources. The restoration of natural processes to the floodplain

within the study area would perpetuate the functional existence and maturation of the Montane Alluvial Forest community in question and would represent a significant gain for this resource.

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

We are not certain what you mean by “admonitions”. We have received comments from federal and state agencies as part of the public review process. The comments and evaluations by other federal and state agencies appear to generally support the Park’s identified preferred alternative and will be addressed formally in the Final Environmental Impact Statement (FEIS). Comments that are primarily regulatory in nature and will be addressed as part of the implementation process when a final plan is selected and may require additional permitting with other regulatory agencies as necessary.

9. National Register boundary re-evaluation: The DEIS states that the implementation of Alternative C will necessitate the re-evaluation of the boundary of the Elkmont Historic District. How does NPS propose to re-evaluate the boundary?

The administrative solution would consist of an amendment to the existing nomination. It is the intention of the National Park Service to amend the district nomination based on scope regarding period of significance, better physical description of the entire district and individual elements and a general thorough evaluation. This would require a request for removal of some buildings as contributing elements in the district due to the fact that many have lost integrity based on deterioration since the original nomination was prepared in 1993/1994. The amendment would document what has deteriorated, and what will be retained after implementing the action.

It is our belief that, in fact the Elkmont Historic District will no longer exist if Alternative C is implemented and that the remaining buildings will have to be assessed to determine if they are eligible for the National register when the project is complete.

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

10. Public and consulting party reaction to Alt C: Why then does the NPS still prefer Alternative C? Why has the NPS not altered its December 2004 position in the face of so much public and consulting party opposition to Alternative C?

6.0 PUBLIC AND AGENCY COMMENTS

The Park received comments in favor of Alternative C, in support of full removal of all buildings, in preservation of all buildings, as well as a range of possibilities in-between these alternatives. The Park is considering and analyzing the substantive comments received from the public and consulting party members as part of the final decision-making process for Elkmont. The agency preferred alternative is selected based on the totality of the resource concerns (both cultural and natural), visitor use objectives, and impact to current and future Park operations. Responses to public and consulting party substantive comments related to the Preferred Alternative will be responded to in the FEIS.

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

Several options for wastewater treatment were considered and/or analyzed for the project alternatives including composting toilets, on-site septic collection with subsurface infiltration, drip irrigation or pressure mound disposal, holding basins for a pump and haul operation to a local wastewater treatment facility, and connection to an existing wastewater treatment system either onsite or offsite. Connecting to the existing Elkmont wastewater treatment plant with system improvements and upgrades was identified as the most cost effective and environmentally responsible option for all alternatives considered in the EIS. System improvements necessary to accommodate estimated additional wastewater generated as part of all alternatives include the following primary treatment process enhancements: influent flow equalization, enhanced aeration, solids micro-filtration and effluent aeration.

The lack of suitable environmental conditions, lack of sustainability, associated environmental impacts and cost were the reasons for dismissing other treatment options. The forested cover, terrain and relatively thin soils in this mountainous environment severely limit alternative treatment options. The long term sustainability and cost of pumping and or hauling waste to an offsite treatment facility is not practical. The existing wastewater permit is limited to 35,000 gallons per day. Because of all of these reasons, a more intensive use of Elkmont buildings that would add infrastructure and generate additional waste is not feasible. Investigating past use of the existing infrastructure revealed that the previous system was plagued with problems that likely did not meet standards at the time and certainly would not meet the standards of today. Additionally, the previous system and operation predated the Outstanding National Resource Waters designation of the Little River in 1997 that by regulation have the highest protection standards possible to any water body.

12. Proposed new parking space: What analysis or assumptions form the basis for the number of parking spaces needed for the various alternatives? The large amount of additional parking proposed would appear to have a significant impact to both natural and cultural resources, particularly to water resources from run-off. Are these large numbers really necessary?

Existing visitation and use combined with projected visitation and use under each alternative provided the basis to estimate required parking spaces to accommodate each

alternative proposal and the rationale for estimates have been provided in the DEIS on pages 73-75, 82, 89-91, 99-101 and 109-112. Elkmont currently services some of the most popular trails within Great Smoky Mountains National Park and while some trailhead parking is defined within Elkmont, most parking areas are poorly defined and lack suitable infrastructure for the current use. The introduction of additional uses to this area proposed in alternatives B to F would increase the number of visitors to this area and would therefore necessitate properly designed, expanded and defined parking within the district. The parking areas would have impacts on natural and cultural resources, but these impacts would be mitigated through the use of best management practices (BMPs). Some techniques used as part of BMPs could include silt fences, sediment traps, check dams, stabilization fabrics, bioretention/infiltration, organic media filtration, permeable pavement, vegetated swales/filter strips, vegetated rock filters, water quality inlets, oil/grit separators and vegetative screening. When considering all uses and the associated service requirements for the proposed uses, the total number of parking spaces is deemed necessary.

Appendix A: Effects to Elkmont Historic District from Alternative F.

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

The Park would like to discuss with the SHPO what the value is of keeping the three buildings, the Wonderland Hotel, Cabin #36 and the garage at Cabin #45, listed as contributing elements when they have each collapsed either partially or entirely and no longer maintain eligibility under the listed criteria for inclusion in the National Register of Historic Places. It is these three buildings that prevent Alternative F, the maximum avoidance alternative from completely avoiding all adverse effects. It is technically impossible to reach a complete avoidance alternative as the National Register nomination is currently written, and without an amendment prior to the process being completed.

6.0 PUBLIC AND AGENCY COMMENTS

Appendix B: Other Consulting Party Questions submitted by the SHPO

1. **Concessionaire operations:** *The Draft Environmental Impact Statement states that the NPS has determined that concession operations are not necessary or appropriate and should not be implemented. Consulting parties question this determination in view of the perceived inconsistency in the application of the policy on which it supposedly is based across the system of National Parks.*

Response is the same as under Question 5, Concessionaires pages 9-11 of this response.

2. **Endangered natural resources:** *The NPS asserts that Elkmont is endangering natural resources with which it shares space when it appears from the DEIS that the Elkmont Historic District is host to thriving natural resource communities that do not seem endangered by the buildings contained within the historic district. Why is this?*

The idea that the “District is host to thriving natural resource communities that do not seem endangered by the buildings contained within the historic district” is not consistent with how the district is characterized in the DEIS. The presence of buildings within Millionaire’s Row along with associated management adversely impacts this community type. Much of the study area has been mapped as “Human Influence” regarding community types due to the ongoing influences of human occupation over the course of the past 100+ years. The floodplain community type known as Montane Alluvial Forest represents a climax forest community. Because of perpetual disturbance in the Elkmont environment for at least the past 100 years, including intensive lumbering operations, this plant community has been heavily impacted.

Retention of buildings within this environment would require an intensive hazard tree management plan to ensure protection of cultural resources from tree falls. Such a management requirement would continuously impact the forest structure and would prevent the reestablishment of old-growth characteristics. Since this planning process began in 2002, ten trees have fallen directly on buildings within the historic district. Not one of these trees showed signs of distress, and likely under a hazard tree management plan, most trees that surround buildings would be removed to protect the resources, visitors and staff.

If allowed to recover, without ongoing interference, this forest type will reestablish itself in this environment. Elkmont offers the opportunity for the restoration and long-term recovery of a stand of Montane Alluvial Forest, a forest type which is one of the most imperiled and ecologically important biotic communities in North America.

3. **Building stabilization:** *Consulting parties question NPS’s lack of protection and stabilization of the contributing buildings within the Elkmont Historic District*

during the intervening years since 1992 when the tenant leases expired and before there was final Section 106 resolution. If the NPS was seriously considering alternatives that would preserve all or most of the buildings, why were they not better maintained?

As funding became available, the Park has done what it could to stabilize and preserve the buildings at Elkmont. The construction methods and materials used in the Elkmont vacation buildings indicate that these structures were at best ephemeral shelters. As the number of years eclipsed the realistic life expectancy of most Elkmont buildings, the cost and practicality of upkeep of these wooden buildings in an extremely moist and humid environment became exorbitant and highly consumptive of resources. Because these buildings were vacation cabins and because it would not have made good business sense to invest in properties that were slated for removal, maintenance on Elkmont buildings by lessees was minimal. Substandard materials were often substituted for more cost effective and modern materials such as treated dimensional lumber or galvanized five-v metal roofing. Even after the Park took full control of the Elkmont buildings when leases expired and following listing on the National Register of Historic Places, the Park intended to document and remove all buildings, partially due to the condition and because this had been the direction dating as far back as Park establishment in 1934. Through consultation with the Tennessee State Historic Preservation Officer and eventually the Advisory Council on Historic Preservation the Park considered other options for some of the Elkmont buildings. Beginning in 1998, the Park began stabilization efforts throughout the District in an effort to preserve Elkmont buildings until a decision is made regarding the future management for this area within the Park. Stabilization work will continue as funding allows until a decision is finalized and implementation begins.

4. **Prioritization of natural resources over cultural resources: Why has NPS assigned so much weight and attention to the Montane Alluvial Forest that is currently only minimally identified as existing within the project APE at the expense of the historic buildings within the Elkmont Historic District that are very much in evidence?**

Please see previous response #7 of this document. In addition, the agency preferred alternative C takes into consideration the significance of the cultural resources as well as the significance of the natural resources. This alternative provides for the preservation and restoration of significant cultural resources in the core of this historic district as well as provides for the restoration of Montane Alluvial Forest. This alternative provides a balanced approach to preserving and managing for the full range of resource values at Elkmont while also allowing for visitor use and an acceptable level of impact to Park operations.

The question gains in importance with the information contained in the environmental document that there are at present a number of other areas in the park where the Montane Alluvial Forest is in evidence. If the Montane Alluvial Forest is of such importance why is the NPS not considering the removal of the campground at Elkmont?

6.0 PUBLIC AND AGENCY COMMENTS

The campground is outside the scope of this General Management Plan (GMP) Amendment and Environmental Impact Statement. The GMP calls for the removal of buildings at Elkmont. Any proposal for retaining buildings requires an amendment to the existing GMP, thus requiring the associated environmental compliance, in this case the EIS. The GMP does not call for any action within the campground, so an impact analysis for that area has not been conducted.

5. Carrying Capacity: *Consulting parties have questioned the correctness of the NPS's analysis of the impact of Alternative C on the Little River.*

The impact analysis for water quality under Alternative C is discussed on pages 306 and 307 of the DEIS. The Park would need to receive more substantive comments on what aspect of the analysis is being questioned for "correctness" in order to respond to this. The proposed action under Alternative C would not increase discharge to the Little River above the permitted allowance of 35,000 gallons per day.

6. Sustainability: *The NPS's decision to limit the number of cabins slated for active use under Alternative C has implications for the future sustainability of the historic properties rehabilitated under Alternative C if there is little if any revenue derived by the NPS from these properties. How can such a passive use of the remaining structures be expected to attract partnerships to assist with their long-term maintenance?*

The effect of implementing Alternative C on NPS operations would be beneficial, permanent, and moderate primarily because the need to stabilize, maintain and police buildings across the District would be largely eliminated, with the exception of the core grouping in Daisy Town, Millionaires Row, and one in Society Hill. Therefore, although there are costs associated with restoring and preserving the remaining buildings and for maintaining the upgraded infrastructure, this cost would be reduced over the existing condition. The cost for implementing and maintaining this alternative would also be offset by the fees received from the active use and rental of the Appalachian Clubhouse and as proposed mitigation the Spence Cabin (#42) as day use facilities through the Special Use authority. (See pages 312 -313 of the DEIS) The Difference in the annual operation cost estimated between the No Action and Alternative C is \$74,665.

In addition to the offset from day use fees, Great Smoky Mountain National Park has an active Friends Organization that has been in operation for over eleven years. Friends of Great Smoky Mountains National Park (Friends) assists the National Park Service in its mission to preserve and protect Great Smoky Mountains National Park by raising funds and public awareness, and by providing volunteers for needed projects. To date, the Friends have raised and donated over \$10,000,000 to the Park for resource projects and programs. The Park also receives over \$1,000,000 annually from Great Smoky Mountain Association (Association). This nonprofit organization was established for the purpose of assisting the historical, scientific, educational, and interpretive activities of the Park. The Association operates the bookstores in visitor centers in the Park as well as gateway communities and donates funds towards Park requested and Association Board approved projects and programs on an annual basis.

7. Budget: *What budgetary planning and funding availability is there for implementation of Alternative C. The fiscal commitment of Alternative C seems far*

beyond that of the 1982 GMP proposal (removal of all Elkmont cabins and structures).

We agree with you that the budgetary commitment by the National Park Service in implementing Alternative C is beyond that of the 1982 GMP proposal. This proposed GMP-Amendment takes into consideration the costs for implementing this alternative, which the National Park Service has selected because it strikes a balance in managing the natural and cultural resources at Elkmont while allowing for visitor use. Funding will be pursued through both federal and non-federal channels. Non-federal funding will be essential in successfully implementing the agency preferred alternative including preservation of proposed buildings. Federal funding to implement demolition, and support infrastructure needs will be pursued from a variety of fund sources available to the National Park Service through annual funding calls.

8. **“Preserve America:”** *To what degree was Presidential Executive Order 13287 “Preserve America” factored into the NPS’s decision making relative to Alternative C?*

The National Park Service has fully considered the provisions of Executive Order 13287 (“Preserve America”) with particular regard to the protection and contemporary use of agency-owned historic properties, and the initiatives for building preservation partnerships. Under the preferred alternative, the Park would seek partnerships with other entities to further the long-term preservation of selected contributing buildings. Alternative C would provide opportunities for heritage tourism to the adjacent gateway communities as the Preserve American Initiative intends. For the reasons provided on pages 9-11 of this response, the Park concluded that concession-operated overnight visitor use at Elkmont was not feasible or consistent with Park purpose and policy requirements. While a concession operation would bring revenue to the provider, it would be unlikely to have a far-reaching beneficial impact on local economic development and vitality consistent with the intent of the executive order.

6.0 PUBLIC AND AGENCY COMMENTS

Appendix A

Elkmont GMPA Section 106 Analysis for Avoid, Minimize, Mitigate Adverse Affects

2.2.8.1 – Concept

Alternative F proposes the greatest preservation of historic resources through the reuse of all historic buildings primarily in the form of overnight accommodations and dining facilities for the general public. The emphasis is on restoration of the cultural landscape and social character of the district by retaining all historic buildings that can be rehabilitated or preserved. Education and interpretation would be provided at the orientation kiosk, on the Wonderland Hotel porch and in the hotel lobby (F2), in Daisy Town, at the Appalachian Clubhouse, at the Spence cabin in Millionaire's Row, and at the Chapman cabin in Society Hill. An option to participate in structured educational programs would be made available to overnight guests and the general public for a fee in addition to Park programs already provided seasonally at the campground for no charge. Protection of natural resources would be dependent upon operational procedures and visitor regulations required of the concession operator.

F2 – 2.2.8.3 Cultural Resource Management

Alternative F provides for the maximum avoidance of adverse effects to cultural resources that contribute to the character of the historic district by retention of all historic buildings that can be rehabilitated or preserved.

In Daisy Town, all contributing buildings would be retained, including fifteen contributing cabins and the Appalachian Clubhouse would be restored to their historical exterior appearance. The Appalachian Clubhouse would also be rehabilitated on the interior to allow for day use and equipped with exhibits to serve as a self-guiding museum. In addition, one non-contributing cabin will be retained in order to maintain the historic streetscape. In Daisy Town, the historic walking path would be restored with gravel and used to separate pedestrian and vehicular traffic. The path would extend from the Appalachian Clubhouse south to the road to Jakes Creek Cemetery Road.

In Society Hill, twenty-two cabins would be restored on the exterior and rehabilitated on the interior; sixteen of these are considered contributing elements to the character of the historic district. The Chapman cabin (#38) in Society Hill would be retained as the focus for an interpretive exhibit highlighting the contribution of Colonel Chapman to the formation of the Park. Contributing buildings also include a garage and woodshed adjacent to the Kuhlman cabin (#40). Alternative F proposes to retain all contributing buildings in Millionaire's Row. Six cabins would be restored on the exterior and rehabilitate the interior for overnight lodging.

In F1, all contributing buildings with the exception of the Wonderland Hotel and Hotel Annex will be retained. The Wonderland Hotel has collapsed due to structural failure. Six contributing cabins and two non-contributing cabin would be restored on the exterior and rehabilitated on the interior and used for overnight lodging. In F2, all contributing buildings including the Wonderland Hotel Annex and a reconstructed Wonderland Hotel would be retained. Reconstruction of the Wonderland Hotel would have to be performed

in compliance with *The Secretary of the Interior's Standards*. The reconstructed hotel would be operated by a concessioner, who would also be responsible for providing resource-based educational opportunities.

Rehabilitated cabins would be operated by the concessioner and rented to the public for overnight lodging in the Wonderland area and in Millionaire's Row. All restoration and rehabilitation would take place in accordance with *The Secretary of the Interior's Standards*.

Alternative F retains buildings and component landscapes in clusters and associations sufficient to provide a sense of the character of the District. Alternative F would retain most contributing buildings for overnight guests or as exhibits. Most cultural landscape features including stonework and foundations will be retained at sites where buildings are removed. Measures to avoid potential impacts to shallow archeological deposits would be used. Alternative F would also provide opportunities to convey the history of several important figures in Elkmont's history.

Avoid, Minimize, Mitigate

Avoidance – Alternative F, option 2 is the maximum avoidance alternative. The only adverse effect under F2 is the removal of Knaffl Cabin (#36). This cabin can not be retained because it has lost its structural integrity. Under F1, three contributing buildings would be removed; two of these buildings have failed and no longer retain structural integrity including the Wonderland Hotel. The Hotel Annex would also be removed, without the main Wonderland Hotel; the Annex would lose its historical association and would likely not maintain integrity. Historic circulations would be retained and used in their historic configuration. Small scale cultural landscape features including the Little River Swimming Hole, Bear Wallow Branch Footbridge, stone walls, stone entrance gates and developed springs would be retained and preserved. Structures including the CCC Bridge, stone patios, and other features would be retained and preserved.

Minimize – Retention of a non-contributing cabin in Daisy Town (#4) would minimize the adverse effects to the cultural landscape by assisting to maintain the historic streetscape. Retention of all cultural landscape features unless pose safety hazard. All subsurface utilities would be placed in previously disturbed trenches. Historic plantings that are not invasive would be maintained throughout the District.

Mitigate: Level 3 documentation of Cabin #36; completion of the Cultural Landscape Inventory for the Historic District; completion of the narrative history for the entire District; story of the historic district and buildings will be interpreter for park visitors; interpretive prospectus will be developed that will describe the themes and the appropriate media to be used; informational copies will be provided to the SHPO; NPS shall afford the SHPO the opportunity to comment on the implementation phase of the restoration/rehabilitation of Elkmont Historic District.

The NPS shall exercise maximum caution and will ensure that an archeological survey is conducted for areas that would be affected as a result of the proposed undertaking. The NPS shall provide an archeologist who will monitor ground-disturbing activities in the vicinity.

6.0 PUBLIC AND AGENCY COMMENTS

Alternative E

2.2.7.1 – Concept

Alternative E emphasizes preservation of historic resources based on rehabilitation of buildings providing for overnight use, as well as the retention of the historical context of the District based on the grouping of buildings. The clustering is important because of the spatial relationship of individual buildings which increases manageability of the proposed uses. Alternative E proposes use of some buildings for public lodging and visiting scientist housing, and retention of others for interpretive purposes. In- depth educational programs for the general public would be provided. This alternative would result in greater intensity of reuse by providing overnight accommodations for larger numbers of people, including limited dining facilities, but would also maintain a commitment to visitor education. An option to participate in structured educational programs would be made available to lodging guests. Public overnight use would be limited to the Wonderland Club, while housing for visiting scientists would be restricted to Millionaire's Row.

Option 2 of Alternative E (E2) also proposes reconstruction of the Wonderland Hotel and rehabilitation of the Annex for public lodging. Public lodging operations and the educational programs would be operated by a concessioner, but the visiting scientist housing would be operated by the Park. The concessioner educational programs included in this alternative are in addition to those provided free to the public seasonally by the Park at the campground. Some restoration of native plant communities would still occur in areas where buildings are removed.

2.2.7.3 Cultural Resource Management

Alternative E provides for the preservation of historic buildings and cultural landscape elements in manageable groupings that also retain the character of the two club communities.

In Daisy Town, all contributing buildings would be retained, including fifteen contributing cabins and the Appalachian Clubhouse to their historical exterior appearance. The Appalachian Clubhouse would also be rehabilitated on the interior to allow for day use and would be equipped with exhibits to serve as a self- guiding museum. In addition, one non-contributing cabin would be retained to maintain the historic streetscape. An existing walking path, in the location of the boardwalk that was present in Daisy Town into the 1920s would be resurfaced with gravel and would aid in separating pedestrian traffic from vehicular traffic. The path would extend from the Appalachian Clubhouse south to Jakes Creek Cemetery Road.

The Chapman cabin (#38) in Society Hill would be restored on the exterior and interpreted as part of the historic district through an exterior exhibit. Seventeen contributing buildings would be removed in Society Hill because of the condition of the buildings.

In Millionaire's Row, Alternative E proposes to retain all contributing buildings, and restore the exterior and rehabilitate the interior for use as visiting scientist housing. Six

contributing cabins would be rehabilitated and two non-contributing buildings would be removed. One garage in the Millionaire's Row area would be restored on the exterior and rehabilitated on the interior to be used for administrative purposes.

In Alternative E, six contributing cabins and one non-contributing cabin in the Wonderland Club would be restored and rehabilitated on the interior to accommodate public overnight lodging.

Option E2 allows for the Wonderland Hotel to be reconstructed to its 1928 historic configuration and to be used for public lodging. Reconstruction of the Wonderland Hotel would be performed in compliance with *The Secretary's Treatment Standards* (NPS 1995; Revised 2001).

Alternative E would protect and perpetuate cultural resources by preserving buildings and associated landscapes throughout the District. This alternative could potentially reuse all contributing buildings in the Wonderland Club and Millionaire's Row areas. Where safety considerations allow, retention of cultural landscape features such as stonework and foundations where buildings are removed would provide opportunities for viewing former building sites. Measures to avoid potential impacts to shallow archeological deposits would be used.

Avoidance – Historic circulation would be retained and used in their historic configuration. Small scale cultural landscape features including the Little River Swimming Hole, Bear Wallow Branch Footbridge, stone walls, stone entrance gates and developed springs would be retained and preserved. Structures including the CCC Bridge, stone patios, and other features would be retained and preserved.

Minimize – Retention of a non-contributing cabin in Daisy Town (#4) would minimize the adverse effects to the cultural landscape by assisting to maintain the historic streetscape. Retention of all cultural landscape features unless pose safety hazard. All subsurface utilities would be placed in previously disturbed trenches. Historic plantings that are not invasive would be maintained throughout the District.

Mitigate: Level 3 documentation of all 17 or 19 contributing buildings; completion of the Cultural Landscape Inventory for the Historic District; completion of the narrative history for the entire District; story of the historic district and buildings will be interpreted for park visitors; interpretive prospectus will be developed that will describe the themes and the appropriate media to be used; informational copies will be provided to the SHPO; NPS shall afford the SHPO the opportunity to comment on the implementation phase of the restoration/rehabilitation of Elkmont Historic District

2.2.6 Alternative D

2.2.6.1 Concept

Alternative D proposes the preservation of historic resources in both the Appalachian and Wonderland clubs that address Park administrative needs, and expansion of educational and day use opportunities. Under Alternative D, sixteen cabins/buildings in Daisy Town, the Chapman Cabin (#38) in Society Hill and the Spence Cabin (#42) in Millionaire's Row would be restored on the exterior and interpreted

6.0 PUBLIC AND AGENCY COMMENTS

through exterior exhibits. The Appalachian Clubhouse would be restored on the exterior and rehabilitated on the interior and the NPS would provide resource education opportunities at the clubhouse focused on the cultural and natural history of the park.

All contributing cabins would be retained in the Wonderland Club. Six cabins would be restored on the exterior and rehabilitated on the interior and used for housing for visiting scientists. Two options for the Wonderland Hotel and Annex are proposed for this alternative. The first option (D1) includes removal of both buildings. The second option (D2) calls for reconstruction of the hotel and rehabilitation of the Annex for the Park to use as curatorial storage. All of the remaining historic buildings would be removed and forest restoration would occur at the former building sites.

2.2.6.3 Cultural Resource Management

Alternative D provides for the preservation of historic resources by proposing exterior restoration of buildings in all areas of the District. In Daisy Town, all contributing buildings would be retained, including fifteen contributing cabins and the Appalachian Clubhouse to their historical exterior appearance. The Appalachian Clubhouse would also be rehabilitated on the interior and would be equipped with exhibits to serve as a self-guiding museum. The NPS would offer public education programs on the park's natural and cultural themes at the clubhouse. In addition, one non-contributing cabin would be retained to maintain the historic streetscape. An existing walking path, in the location of the boardwalk that was present in Daisy Town into the 1920s would be resurfaced with gravel and would aid in separating pedestrian traffic from vehicular traffic. The path would extend from the Appalachian Clubhouse south to Jakes Creek Cemetery Road.

The Chapman cabin (#38) in Society Hill would be restored on the exterior and interpreted as part of the historic district through an exterior exhibit. X number of contributing buildings would be removed in Society Hill because of the condition of the buildings.

In Millionaire's Row, the interior of the Spence cabin (#42) would be preserved, the exterior would be restored and the cabin would be the focus of another wayside exhibit. A path would be provided to the Spence cabin to allow for a pedestrian walking tour of the area. Five contributing cabins would be removed.

In the Wonderland area, six cabins would be restored on the exterior and rehabilitated on the interior for use as temporary housing for visiting scientists. Under D1, the Wonderland Hotel and Annex would be removed, while under D2, the Wonderland Hotel would be reconstructed and the Annex restored on the exterior and rehabilitated on the interior for curatorial storage. All work would be done in accordance with *The Secretary's Standards* (NPS 1995; Revised 2001). Alternative D would protect and perpetuate cultural resources by preserving buildings and representative cultural landscapes throughout the District. This alternative also provides opportunities to convey the history of several important figures in Elkmont's past. Most cultural landscape features such as stonework and foundations would be retained at the sites where buildings are removed. Measures to avoid potential impacts to shallow archeological deposits would be used.

Avoidance – Historic circulation would be retained and used in their historic configuration. Small scale cultural landscape features including the Little River Swimming Hole, Bear Wallow Branch Footbridge, stone walls, stone entrance gates and developed springs would be retained and preserved. Structures including the CCC Bridge, stone patios, and other features would be retained and preserved.

Minimize – Retention of a non-contributing cabin in Daisy Town (#4) would minimize the adverse effects to the cultural landscape by assisting to maintain the historic streetscape. Retention of all cultural landscape features unless pose safety hazard. All subsurface utilities would be placed in previously disturbed trenches. Historic plantings that are not invasive would be maintained throughout the District.

Mitigate: Level 3 documentation of all 22 or 24 contributing buildings; completion of the Cultural Landscape Inventory for the Historic District; completion of the narrative history for the entire District; story of the historic district and buildings will be interpreter for park visitors; interpretive prospectus will be developed that will describe the themes and the appropriate media to be used; informational copies will be provided to the SHPO; NPS shall afford the SHPO the opportunity to comment on the implementation phase of the restoration/rehabilitation of Elkmont Historic District

Alternative C 2.2.5.1 Concept

This alternative would provide for cultural resource preservation through exterior restoration of most of the buildings in Daisy Town and the Chapman Cabin in Society Hill, and for rehabilitation of the Appalachian Clubhouse as a day use facility for the public. As in Alternative A, exhibits would be provided about the history of the Town of Elkmont and natural history of synchronous fireflies. The Elkmont Nature Trail brochure would be updated to include a description of important natural resources of the District. In addition to exhibits provided in Alternative A, Alternative C proposes to include a variety of other interpretive features in the Wonderland Club, in Daisy Town and at the Appalachian Clubhouse.

The Visitor Education focus would be interpretation of the changing landscape, the development of Elkmont, and the travel and tourism that eventually led to establishment of the Park. Restored buildings would provide the sense of community and spatial relationships in sections of the District.

2.2.5.3 Cultural Resource Management

Alternative C provides for the preservation of historic resources in the core of the resort community at the Appalachian Club (Daisy Town) and the majority of Elkmont's cultural landscape features. In Daisy Town, all contributing buildings would be retained, including fifteen contributing cabins and the Appalachian Clubhouse to their historical exterior appearance. The Appalachian Clubhouse would also be rehabilitated on the interior and would be equipped with exhibits to serve as a self- guiding museum. In addition, one non-contributing cabin would be retained to maintain the historic streetscape.

Alternative C proposes preservation of the Daisy Town portion of the Appalachian Club.

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Daisy Town is the oldest vacation area of Elkmont and began the club- town boom there. The proximity of the Daisy Town cabins to the clubhouse building and the presence of landscape elements such as stone walls and walkways provide the best opportunity to demonstrate to visitors how this resort community evolved and functioned. The front porches, and the close setback of most cabins to the road and walkway in Daisy Town, create a visual order that strongly suggests the community structure in this portion of Elkmont. The density of buildings and continuous streetscape characteristics, such as border walls and pathways, are complete in Daisy Town in contrast to other areas of Elkmont where the streetscape and building lines are broken, incomplete or entirely absent. Daisy Town also preserves a representative cross section of the various construction techniques and building materials present in the Elkmont Historic District. This alternative also includes the Chapman cabin in Society Hill, a building associated with Colonel David Chapman who was influential in the establishment of Great Smoky Mountains National Park.

Alternative C would retain the historic swimming hole at Little River as well as most of the landscape elements, such as walls and other small- scale features throughout the Elkmont community. The gravel walking path extending from the Appalachian Clubhouse to Jakes Creek Cemetery would be restored. This path was originally developed as a boardwalk, but was later replaced with compacted gravel during the period of significance. Although the historic location of this pathway remains visible, it is not actively maintained. This path would continue to provide separation of pedestrian and vehicular traffic.

This alternative also provides a variety of opportunities for interpretation of Elkmont's cultural resources. Where buildings are removed, stone walls and foundations would be left in place. This alternative would also incorporate interpretive wayside exhibits that focus on natural history and the range of Elkmont's human history, including the logging history of the area and the construction of the railroad that led to the establishment of the Town of Elkmont.

Alternative C would protect and preserve Elkmont's cultural resources through the retention and interpretation of a representative collection of buildings and the associated cultural landscape in a core area of the District. The preservation of the Chapman Cabin (#38) would provide opportunities to convey the history of an important figure in Elkmont's past. This alternative would retain the maximum number of Elkmont's cultural landscape features, such as stonework and foundations where buildings are removed. Combined with interpretive media, especially waysides, Alternative C will allow visitors to gain an understanding of the scope of the Elkmont vacation community and how it functioned in its heyday. Measures to avoid potential impacts to shallow archeological deposits would be used.

Avoidance – Historic circulation would be retained and used in their historic configuration. Small scale cultural landscape features including the Little River Swimming Hole, Bear Wallow Branch Footbridge, stone walls, stone entrance gates and developed springs would be retained and preserved. Structures including the CCC Bridge, stone patios, and other features would be retained and preserved.

Minimize – Retention of a non-contributing cabin in Daisy Town (#4) would minimize the adverse effects to the cultural landscape by assisting to maintain the historic streetscape. Retention of all cultural landscape features unless pose safety hazard. All subsurface utilities would be placed in previously disturbed trenches. Historic plantings that are not invasive would be maintained throughout the District.

Mitigate: Level 3 documentation of all 31 contributing buildings; completion of the Cultural Landscape Inventory for the Historic District; completion of the narrative history for the entire District; story of the historic district and buildings will be interpreter for park visitors; interpretive prospectus will be developed that will describe the themes and the appropriate media to be used; informational copies will be provided to the SHPO; NPS shall afford the SHPO the opportunity to comment on the implementation phase of the restoration/rehabilitation of Elkmont Historic District. Retention of Cabin 42 “River Lodge”. The cabin would be restored on the exterior to a point within the period of significance and rehabilitated on the interior as a day use facility. The retention of this cabin would bring the total number of buildings retained to 19.

2.2.4 Alternative B Concept

Alternative B proposes to retain some of the historic buildings in the District and would provide for restoration of native plant communities in locations where buildings are removed. The buildings proposed for restoration and preservation were selected in order to provide a contiguous representative collection of historic buildings and the associated cultural landscape in one area of the District during the period of significance.

Alternative B proposes that exhibits would be provided on the history of Elkmont and on synchronous fireflies. The Elkmont Nature Trail brochure would be updated as well. In addition, Alternative B includes a variety of interpretive features throughout the District focused on the natural and cultural resources of the Elkmont Historic District

The Visitor Education focus would be interpretation of the changing landscape, the development of Elkmont, and the travel and tourism that eventually led to establishment of the Park.

2.2.4.3 Cultural Resource Management

As noted above, Alternative B provides for cultural resource management consistent with the Park’s mission by retaining and restoring a grouping of historic buildings. Eleven Contributing cabins and one non-contributing cabin would be restored on the exterior and preserved on the interior. These buildings were selected as a representation of a contiguous cultural landscape in the Daisy Town part of the District. The Appalachian Clubhouse would be restored on the exterior and rehabilitated on the interior for public day use rental. Interior exhibits would be installed in the clubhouse on the cultural history of the historic district. Where buildings are removed, stone walls and foundations would be left in place for interpretive purposes. The gravel walking path extending from the Appalachian Clubhouse to Jakes Creek Cemetery would be restored. This path was originally developed as a boardwalk, but was later replaced with compacted gravel during the period of significance. Currently, although the historic location of this pathway remains visible, it is not actively maintained. Gravel will be

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placed over the existing path, extending from the Appalachian Clubhouse south to the road to Jakes Creek cemetery. This path would provide for separation of pedestrian and vehicular traffic.

Alternative B would protect and perpetuate cultural resources through preservation and restoration of a representative collection of buildings and the associated cultural landscape in one area of the District. Stonework and foundations would be retained at some sites where buildings are removed. Measures to avoid potential impacts to shallow archeological deposits would be used.

Avoidance – Historic circulation would be retained and used in their historic configuration. Small scale cultural landscape features including the Little River Swimming Hole, Bear Wallow Branch Footbridge, stone walls, stone entrance gates and developed springs would be retained and preserved. Structures including the CCC Bridge, stone patios, and other features would be retained and preserved.

Minimize – Retention of a non-contributing cabin in Daisy Town (#4) would minimize the adverse effects to the cultural landscape by assisting to maintain the historic streetscape. Retention of all cultural landscape features unless pose safety hazard. All subsurface utilities would be placed in previously disturbed trenches. Historic plantings that are not invasive would be maintained throughout the District.

Mitigate: Level 3 documentation of all 36 contributing buildings; completion of the Cultural Landscape Inventory for the Historic District; completion of the narrative history for the entire District; story of the historic district and buildings will be interpreter for park visitors; interpretive prospectus will be developed that will describe the themes and the appropriate media to be used; informational copies will be provided to the SHPO; NPS shall afford the SHPO the opportunity to comment on the implementation phase of the restoration/rehabilitation of Elkmont Historic District.

Alternative A Mitigation

Avoidance – Historic circulation would be retained and used in their historic configuration. Small scale cultural landscape features including the Little River Swimming Hole, Bear Wallow Branch Footbridge, and developed springs would be retained and preserved. Structures including the CCC Bridge, stone patios, would be retained and preserved.

Minimize – Historic plantings that are not invasive would be maintained throughout the District.

Mitigate: Level 3 documentation of all 49 contributing buildings; completion of the Cultural Landscape Inventory for the Historic District; completion of the narrative history for the entire District; story of the historic district and buildings will be interpreter for park visitors; interpretive prospectus will be developed that will describe the themes and the appropriate media to be used; informational copies will be provided to the SHPO; NPS shall afford the SHPO the opportunity to comment on the implementation phase of the restoration/rehabilitation of Elkmont Historic District.

No Action Alternative Mitigation

Avoidance – Historic circulation would be retained and used in their historic configuration. Small scale cultural landscape features including the Little River Swimming Hole, Bear Wallow Branch Footbridge, stone walls, stone entrance gates and developed springs would be retained and preserved. Structures including the CCC Bridge, stone patios, and other features would be retained and preserved.

Minimize –Retention of all cultural landscape features unless pose safety hazard. All subsurface utilities would be placed in previously disturbed trenches. Historic plantings that are not invasive would be maintained throughout the District.

Mitigate: Level 3 documentation of all 49 contributing buildings; completion of the Cultural Landscape Inventory for the Historic District; completion of the narrative history for the entire District; story of the historic district and buildings will be interpreter for park visitors; interpretive prospectus will be developed that will describe the themes and the appropriate media to be used; informational copies will be provided to the SHPO; NPS shall afford the SHPO the opportunity to comment on the implementation phase of the restoration/rehabilitation of Elkmont Historic District.

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Appendix B – Choosing By Advantages

	No Action	Alt A	Alt B	Alt C	Alt D	Alt E	Alt F
Factor 1	95	100	65	60	50	20	0
Factor 2	5	0	45	60	77	95	85
Factor 3	10	8	25	40	50	70	0
Factor 4	12	25	22	21	20	10	0
TOTAL	122	133	157	181	197	195	85
Gross Construction Costs	1.8 mil	1.9 mil	5.5 mil	7.4 mil	20.5	23.0	32.8

Before cost comparison, Alternative D had the highest rating with 197 as being the most advantageous for gains in the 4 factors. Alternative F had the lowest rating of 85 in benefits.

When costs were considered, there was a substantial jump in costs from C to D. From D to E, costs increased, but there was a decline in the amount of benefits for the money. Alternative C provides the most benefits for the money and is also the environmentally preferred alternative. (See graphs below.)

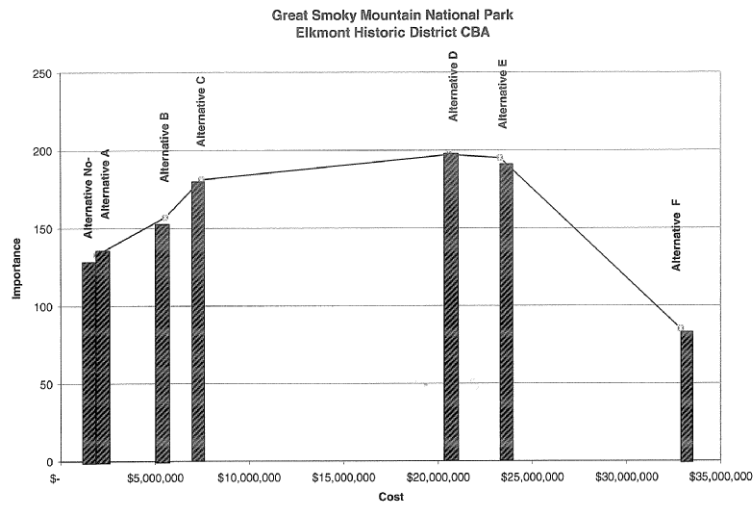
Cost Analysis

Initial cost estimates were developed for the seven alternatives. Results were graphed with the importance on the vertical scale and initial estimated construction cost on the horizontal scale.

Initial Costs and Importance

ALTERNATIVE	COST	IMPORTANCE
Alternative No-Action	\$ 1,850,189	122
Alternative A	\$ 1,912,161	133
Alternative B	\$ 5,545,956	157
Alternative C	\$ 7,463,586	181
Alternative D	\$ 20,583,443	197
Alternative E	\$ 23,281,048	195
Alternative F	\$ 32,878,069	85

Starting with the No-Action Alternative, Alternative A, B & C provide incremental benefits for each increase in cost. Starting with Alternative D, the amount of benefits achieved for the additional costs, becomes noticeably less. Alternative E provides a decrease in benefits for an increase in costs. Alternative F has a large decrease in benefits for a relatively large increase in costs.



The life cycle costing combines the initial development costs with estimated costs of maintenance and operation over a 20-year time frame. Costs are shown as present worth (dollars in FY 2004 value).

