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## United States Department of the Interior

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JUL 01 2009

#### Memorandum

To: Superintendent, Great Smoky Mountains National Park

From: Regional Director, Southeast Region *Daniel*

Subject: Record of Decision for the Final Environmental Impact Statement/General Management Plan Amendment, Elkmont Historic District, Great Smoky National Park, Tennessee and North Carolina

Attached please find the signed Record of Decision for the above mentioned project.

If you require further assistance or information, please contact the Acting Chief, Planning and

Compliance Division, at 404-507-5709.

Attachment

**United States Department of the Interior**

**National Park Service**

**Final RECORD OF DECISION**

**Final Environmental Impact Statement/General Management Plan Amendment**

**Elkmont Historic District, Great Smoky Mountains National Park, Tennessee/North Carolina**

**INTRODUCTION**

The Department of the Interior, National Park Service (NPS), has prepared this Record of Decision (ROD) on the *Final General Management Plan Amendment (GMPA)/Environmental Impact Statement (EIS)* for the Elkmont Historic District (District) of Great Smoky Mountains National Park (park), Tennessee and North Carolina. This ROD includes a statement of the decision made, synopses of other alternatives considered, the basis for the decision, a description of the environmentally preferable alternative, a discussion of impairment of park resources or values, measures to minimize environmental harm, and an overview of public involvement in the decision-making process.

**DECISION (SELECTED ACTION)**

The NPS will implement the selected action (the preferred Alternative C) as described in the *Final GMPA/EIS* issued according to the notice published by the Environmental Protection Agency (EPA) in the *Federal Register* (Volume 74, Number 83, Page 20297 on May 1, 2009, the waiting period ended on June 1, 2009).

Under the selected alternative, the NPS will preserve a representative collection of 19 historic buildings in the District of the park. The District is listed in the National Register of Historic Places (NRHP). Within the District, the core of the former Appalachian Club resort community known as “Daisy Town” will be preserved including the Appalachian Clubhouse and a cluster of 16 cabins. Fifteen of these cabins are identified as contributing to the significance of the District. An additional non-contributing cabin will be preserved to maintain the visual continuity of the Daisy Town streetscape. The exteriors of these buildings will be restored to approximate the appearance of this portion of the District during its early 20<sup>th</sup> century period of significance. The Appalachian Clubhouse interior will be rehabilitated for public rental and day use activities. The 16 cabins will be retained for interpretive purposes.

In addition to the Daisy Town buildings, the exterior of the Chapman cabin in the “Society Hill” portion of the District will be restored to the early 20<sup>th</sup> century period of significance and retained for interpretive purposes, the exterior of the Spence cabin in “Millionaire’s Row” will also be restored and its interior rehabilitated for public rental and day use. The gravel pathway from the Appalachian Clubhouse to Jakes Creek Cemetery will be restored. Historic plantings that are not invasive would be retained throughout the District. To provide access and circulation, existing parking areas will be reconfigured and resurfaced, and a new day use parking area will be constructed.

Altogether, 30 buildings identified as contributing to the District’s significance will be removed. Buildings slated for removal include the Wonderland Hotel Annex, 26 cabins, and 3 garages. The remains of the structurally failed Wonderland Hotel were removed in December 2006.

The preserved buildings and cultural landscape features, along with wayside exhibits and other interpretive media, will be used to enhance visitor understanding of the history and development of the Elkmont vacation community, its architecture, and the area’s important cultural and natural resources.

To increase species diversity, improve and increase wildlife habitat, and provide soil stabilization within the District, the NPS will restore native plant communities in suitable areas, including the sites where buildings have been removed. Removal of buildings within the Little River floodplain would allow for gradual succession to native communities.

The selected alternative will not generate wastewater discharge above the permitted allowable level from the sewage treatment plant or contribute nonpoint runoff into the Little River or its tributaries. No additional structures or activities within the 100-year floodplain are proposed.

### **OTHER ALTERNATIVES CONSIDERED**

The NPS evaluated six other alternatives for the treatment and management of the District in the GMPA/EIS. The No-Action Alternative represents a continuation of the management direction established for the District under the 1982 *GMP*. Under this alternative all of the District's buildings and structures would be removed and the area would be allowed to return to a natural state. The NPS management objectives for the District regarding visitor use, recreational opportunities, and natural resource management would remain unchanged from the 1982 *GMP*.

Alternative A proposed the greatest protection of natural resources and natural systems in the District, with all buildings and structures removed in accordance with the 1982 *GMP*. This alternative differed from the No-Action Alternative in that the park would undertake an active plant restoration program in disturbed areas, and within areas conducive to the reestablishment of montane alluvial forest to mitigate for past human activities and development.

Under Alternative B, the Appalachian Clubhouse and a cluster of 12 cabins would be preserved in the Daisy Town area of the District with exteriors restored to assist with interpretation. The interior of the clubhouse would be rehabilitated for public day use. Features of the cultural landscape including stone

walls and building foundations would be preserved. Regeneration of native plant communities would be managed for in disturbed areas, including the control of invasive exotic plants. Wayside exhibits and other interpretive features would be placed in the District. A new parking area would be constructed for day use visitors and hikers accessing trails from the area.

Under Alternative D, the Appalachian Clubhouse and a cluster of 16 cabins in Daisy Town would be preserved. The Chapman cabin in Society Hill and the Spence cabin in Millionaire's Row would also be preserved. The exteriors of these buildings would be restored for interpretation, and the interior of the Appalachian Clubhouse would be rehabilitated for public day use. Two options were provided for the Wonderland Hotel and Annex: D1) complete removal of both structures, and D2) reconstruction of the hotel and rehabilitation of the annex as a curatorial facility. Six cabins in the vicinity of the hotel would be retained to provide temporary housing for researchers. The historic circulation pattern and configuration of roads and pathways would be retained. 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. Historic plantings that are not invasive would be maintained throughout the District.

Native plant communities would be restored in disturbed areas. Wayside exhibits and other interpretive features would be placed in the District. A new parking area would be constructed for day use visitors and hikers accessing trails from the area.

Under Alternative E, the Appalachian Clubhouse and a cluster of 16 cabins in Daisy Town would be preserved. The Chapman cabin in Society Hill and six other contributing cabins in Millionaire's Row, including the Spence cabin, would also be preserved with restored exteriors. The interior of the Appalachian Clubhouse would be rehabilitated for public day use, and the Millionaire's Row cabins would be rehabilitated for use as temporary housing for researchers. Two options were provided for the



Wonderland Hotel and Annex: E1) complete removal of both structures, and E2) reconstruction of the hotel and rehabilitation of the annex for overnight lodging under the management of a private concession operation. All cultural landscape features would be preserved unless they pose a safety hazard. Historic plantings that are not invasive would be maintained throughout the District.

Native plant communities would be restored in disturbed areas, primarily in the Society Hill area where buildings would be removed. Wayside exhibits and other interpretive features would be placed in the District. A new parking area would be constructed for day use visitors and hikers accessing trails from the area. Alternative means of sewage treatment would be required to address the increased visitation demands on the existing system.

Under Alternative F, most of the historic buildings in the District would be preserved and under this alternative there are limited opportunities to restore natural resources. The Appalachian Clubhouse and a cluster of 16 cabins in Daisy Town would be preserved with restored exteriors for interpretive purposes. Twenty-two cabins in Society Hill (including the Chapman cabin) and 6 other contributing cabins in Millionaire's Row (including the Spence cabin) would be rehabilitated for overnight lodging under the management of a private concession operation. The interior of the Appalachian Clubhouse would be rehabilitated for public day use. Two options were provided for the Wonderland Hotel and Annex: F1) complete removal of both structures, and F2) reconstruction of the hotel and rehabilitation of the annex for overnight lodging under the management of a private concession operation. Eight other cabins in the vicinity of the hotel would also be rehabilitated for overnight concession-managed lodging. Wayside exhibits and other interpretive features would be placed in the District. A new parking area would be constructed for visitor day use and hikers accessing trails from the area. Alternative means of sewage treatment would be required to address the increased visitation demands on the existing system. Natural resources would remain as they are since most buildings would be retained in the District.

## BASIS FOR DECISION

The Organic Act of 1916 established the NPS in order to “promote and regulate the use of parks...” As defined by the Organic Act, the purpose of the national parks is “to conserve the scenery and natural and historic objects and wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.” The Organic Act provides overall guidance for the management of the park and the District. The park’s 1926 authorizing and 1934 establishment legislations, and other relevant laws and policies [e.g., the National Environmental Policy Act (NEPA), the National Historic Preservation Act (NHPA), NPS *Management Policies 2006*, and the park’s 1982 *GMP*)] provided further comprehensive guidance for this planning effort.

In addition, the primary goal for this planning process (identified through public participation) was to foster enjoyment, understanding, appreciation, and protection of natural and cultural resources both within the District and park-wide. Based on this primary goal, the objective of this decision was to balance the protection of natural and cultural resources within the District, while providing for visitor enjoyment in a cost-effective, sustainable manner.

Implementation of the selected alternative will likely require improvements to roadways, trails, bridges, waterlines, as well as stream stabilization. These actions may require compliance with Section 10 of the Rivers and Harbors Act, Section 404 of the Clean Water Act, and other laws and policies before work could begin (*Final GMPA/EIS, Volume 2, Pages 41 to 43; Appendix A, Pages 3 to 6*). In the long-term, implementation will maintain and enhance the condition and productivity of many natural resources: soils; floodplains; aquatic and terrestrial communities; wetland functional values; threatened, endangered, rare, and sensitive species; and water quality.

Benefits to the long-term productivity of all biotic resources will occur because of the increase in land available for restoration of native plant communities. Removal of selected buildings and structures

throughout the District, especially within the floodplain along the Little River (Millionaire's Row area), will increase the area available for reestablishment native plant communities. In addition, restoration of native plant communities will further protect the water quality of the Little River, an Outstanding National Resource Water by providing increased buffering capacity.

Adverse effects to historic properties will occur because of removal of 30 contributing buildings and the diminished sense of spatial organization and layout associated with the District's cultural landscape. While the overall effect on historic properties is adverse, the preservation, restoration and rehabilitation of selected buildings and cultural landscape features in accordance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties* will have long-term beneficial impacts for this core group of retained buildings. The selected alternative preserves the core collection of historic resources in the Appalachian Clubhouse area. This particular area evokes the strongest sense of community within Elkmont and offers the greatest opportunity for visitors to understand the broad cultural patterns and historical associations of this 20<sup>th</sup> century resort community. The buildings and landscape features proposed for retention represent a realistic and feasible long-range management option for the preservation of Elkmont's cultural resources.

The selected alternative provides for a wide range of visitor uses and opportunities for understanding of natural and cultural resources, and a minor increase in visitation above current levels is projected. The District's retained cultural resources and natural resources are anticipated to accommodate visitation levels without sustaining major adverse impacts. Impacts to the Little River will be negligible from both point and non-point pollution sources.

Long-term, moderate benefits to park operations will be achieved because the current level of effort to maintain buildings in a stabilized state of repair will be reduced, as the buildings being retained are stabilized and restored. The level of NPS patrols and monitoring required to prevent vandalism will be



reduced with fewer buildings remaining. The potential safety hazards to the visiting public associated with large numbers of unstable buildings will also be reduced. Most impacts will be short-term and, with the exception of permanent adverse impacts to removed contributing buildings, all other impacts will be minor to negligible in intensity.

To identify the preferred alternative for managing the District, the NPS employed the "Choosing by Advantages" decision-making process. This process was used to analyze the advantages of each alternative, and the total advantages of each were then quantified and ranked. A cost/benefit analysis was applied and the preferred alternative was identified as providing the most advantages for the associated costs. Each of the seven project alternatives was individually evaluated under the following four factors:

- protection of natural resources
- protection of cultural resources
- provision for visitor education and enjoyment
- protection of public health, safety, and welfare

The preferred alternative was identified by the NPS as providing the most benefit for the associated cost in conjunction with all other factors analyzed.

## **ENVIRONMENTALLY PREFERABLE ALTERNATIVE**

The environmentally preferable alternative is defined as the alternative that will promote the national environmental policy as expressed in §101 of NEPA, as amended. Section 101 states that "... it is the continuing responsibility of the Federal government to: (1) fulfill the responsibilities of each generation as trustee of the environment for succeeding generations; (2) assure for all American safe, healthful, productive, and aesthetically and culturally pleasing surroundings; (3) attain the widest range of beneficial uses of the environment without degradation, risk to health or safety, or other undesirable and unintended consequences; (4) preserve important historic, cultural, and natural aspects of our national heritage, and

maintain, wherever possible, an environment which supports diversity, and variety of individual choice; (5) achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities; and (6) enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources."

The environmentally preferable alternative is also the NPS's preferred Alternative C (selected action) in the *Final GMPA/EIS*. Alternative C surpasses the other alternatives in realizing the full range of NEPA goals in Section 101 because it "best protects, preserves and enhances cultural, historic and natural resources" in the District by causing "the least damage to the biological and physical environment." This alternative was determined to achieve the best balance among conflicting resource protection and preservation objectives. Although 30 contributing historic buildings will be removed, 19 historic buildings will be retained primarily in a core area of the District along with cultural landscape features to convey a sense of the District's historical character and associations. The environmentally preferred alternative allows for restoration of native plant communities in previously disturbed areas of the District including locations where buildings will be removed.

The environmentally preferred alternative (Alternative C) strikes a reasonable and operationally sustainable balance among the alternatives, some of which were more protective of natural resources and others more protective of cultural resources. The selected alternative best achieves the intent of criterion (2) by providing all park visitors with positive experiences in aesthetically, culturally pleasing, and safe surroundings, and criterion (3) by providing the widest range of beneficial uses with the least amount of environmental degradation and safety concerns. To nearly equivalent degrees, the selected alternative best achieves criterion (4) by preserving the District's important historic, cultural, and natural features while supporting diversity and variety of individual choice, and criterion (5) by balancing long-term resource preservation objectives with provision for visitor access, interpretation, and enjoyment of the District's resources in a sustainable fashion.

## FINDINGS ON IMPAIRMENT OF PARK RESOURCES AND VALUES

The NPS may not allow the impairment of park resources and values unless directly and specifically provided for by legislation or proclamation establishing the park. Impairment that is prohibited by the NPS Organic Act and the General Authorities Act is an impact that, in the professional judgment of the responsible NPS manager, would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values. In determining whether impairment would occur, park managers examine the duration, severity and magnitude of the impact; the resources and values affected; and direct, indirect, and cumulative effects of the action. According to *NPS Management Policies 2006* (1.4.5), “an impact would be more likely to constitute an impairment to the extent that it affects a resource or value whose conservation is (a) necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park; (b) key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; or (c) identified as being of significance in the park’s general management plan or other relevant NPS planning documents.”

This policy does not prohibit all impacts to park resources and values. The NPS has the discretion to allow impacts to park resources and values when necessary and appropriate to fulfill the purposes of a park, so long as the impacts do not constitute impairment. Moreover, an impact is less likely to constitute impairment if it is an unavoidable result, which cannot be further mitigated, of an action necessary to preserve or restore the integrity of park resources or values.

Adverse effects to historic properties will occur because of removal of 30 contributing buildings and the diminished sense of spatial organization and layout associated with the District’s cultural landscape. The removal of these 30 contributing buildings within the District will constitute an irretrievable commitment or loss of cultural resources as defined in Section 102(C) (v) of NEPA. A small historic district within

the Appalachian Clubhouse portion of Elkmont will remain following the implementation of this alternative. After analyzing the environmental impacts described in the *Final GMPA/EIS* and the public comments received, the NPS has determined that implementation of the selected action will not constitute an impairment of the park's resources and values. The actions comprising the selected action are intended to achieve the most reasonable balance for protection, preservation, and enhancement of the park's natural and cultural resources, and provide for high-quality visitor experiences. While this alternative will adversely affect cultural resources within the District through the removal of 30 contributing buildings, a small historic district will remain and the adverse effects will be mitigated through a Memorandum of Agreement (MOA) signed among the NPS, the Tennessee State Historic Preservation Officer (SHPO), and the Advisory Council on Historic Preservation (ACHP). From an overall park-wide perspective, implementation of the selected action will have no major adverse impacts on the park's fundamental resources or the range of visitor experiences.

## **MEASURES TO MINIMIZE ENVIRONMENTAL HARM**

Measures to avoid or minimize environmental harm that could result from implementation of the selected action have been identified and incorporated into the preferred alternative and are described in detail in the *Final GMPA/EIS (Section 2.10 Mitigation)*.

The objectives for minimizing impacts to natural resources include protection of montane alluvial forest in areas conducive for its regeneration; protection of the Little River's water quality consistent with its designation as an Outstanding National Resource Water, along with other streams, seeps, wetlands, and floodplains; protection of federally-listed threatened or endangered species and their habitats; avoiding loss of habitat for synchronous firefly populations; and maintaining visitor use at levels that sustain natural resources and minimize disturbance. A variety of mitigation measures will be employed including controlling invasive exotic plant species in disturbed areas such as the locations of removed buildings;



establishing buffers around important habitat areas and water resources to avoid construction-related impacts; timing of selected structure and tree removal to avoid disturbance of critical nesting and roosting periods for bird and bat species; use of pervious concrete for parking area paving to minimize erosion from storm water runoff ; and use of low ground pressure construction equipment in the District.

Because of the adverse effects to historic properties associated with removal of buildings contributing to the significance of the District, a MOA was finalized by signature on January 5, 2009 among the NPS, the Tennessee SHPO, and the ACHP pursuant to regulations of the Advisory Council at 36 CFR Section 800.6 (a). The following consulting parties were invited to concur with the agreement: Eastern Band of Cherokee Indians, the Chickasaw Nation, Smoky Mountain Hiking Club, National Parks Conservation Association, Sierra Club, National Trust for Historic Preservation, and the Elkmont Preservation Committee. The agreement stipulates several measures that will be undertaken by the NPS to mitigate the adverse effects on historic properties. These measures include photographic documentation of the District's buildings in accordance with standards of the Historic American Buildings Survey; preparation of a cultural landscape inventory for the District; preparation of a NRHP nomination documenting the significance of the remaining historic buildings and landscape features as a new historic district; preparation of historic structure reports for retained buildings to guide stabilization, restoration, and rehabilitation treatments; preparation of an interpretive plan; and preparation of an archeological resources management plan addressing any additional archeological survey requirements, avoidance/monitoring measures, and treatment of unexpected discoveries.

## **PUBLIC INVOLVEMENT**

Between 1994 and 1999, the park prepared three plans for management of the District (listed in the NRHP in 1994). The ACHP advised that the 1999 planning proposal constituted a new action compared to the

direction provided in the park's 1982 *GMP*. As a result, the park initiated planning in 2001 to amend its 1982 *GMP* and develop a long-term management approach specifically for the District.

The *Final GMPA/EIS* has included extensive consultation and participation by the public, government agencies, and other organizations. Initial public scoping began in 2002. A Notice of Intent (NOI) to prepare an EIS for the plan amendment was published in the Federal Register on March 31, 2004. The EPA Notice of Availability (NOA) of the *Draft GMPA/EIS* was published in the Federal Register on February 10, 2006.

Public meetings and newsletters were used to keep the public informed and involved in the planning process for the District. A mailing list was compiled and updated periodically. The list included members of governmental agencies, organizations, businesses, legislators, local governments, and interested citizens. Park staff distributed five newsletters and held six sets of meetings or workshops for the general public between April 2002 and March 2006. The purpose of the newsletters and meetings was to provide information and updates on the project, and solicit public input. The last newsletter was distributed to the public in March 2006 to announce the location and time of the public meetings for the *Draft GMPA/EIS*. Discussion of these meetings and a summary of public and agency comments and NPS responses are provided in the *Final GMPA/EIS (Volume 2)*.

In October 2003, the planning team initiated informal consultation with the U.S. Fish and Wildlife Service (USFWS) to determine the presence of federally-listed threatened and endangered species in the Elkmont area. The USFWS responded in November 2003 that no records were found to indicate the presence of federally-listed or proposed endangered or threatened species within the project area. In January 2006, the USFWS was sent a copy of the *Draft GMPA/EIS* for review of proposed alternatives and associated potential impacts. The USFWS did not send the park any comments on the *Draft GMPA/EIS*.

The NPS recognizes that indigenous peoples may have ancestral ties to lands now under NPS management. American Indian concerns and issues regarding NPS actions are sought through consultations held on a government-to-government basis in accordance with applicable federal laws, executive orders, regulations, and policies. Consultation also fulfills requirements of Section 106 of the NHPA, as amended, and NEPA. Letters were sent to the following American Indian tribes on May 7, 2002, to formally invite their participation in the planning process:

- Cherokee Nation of Oklahoma
- United Keetoowah Band of Cherokee Indians
- The Eastern Band of Cherokee Indians
- The Chickasaw Nation

Of the four tribes contacted, the Chickasaw Nation and the Eastern Band of Cherokee Indians responded to the park regarding their interest in the project and became consulting party members. Consultation with these tribes was concurrent with the NEPA planning process, with particular emphasis on archeological resources and surveys within the District. In September 2002, the Eastern Band of Cherokee Indians provided comments on a report concerning the cultural and archeological resources of the District. Members from the Eastern Band of Cherokee Indians also conducted an on-site visit with NPS staff in October 2002. Informal correspondence and updates were conducted and provided between these two tribes and the park throughout the course of this planning process. Copies of the *Draft GMPA/EIS* were sent to the Chickasaw Nation and the Eastern Band of Cherokee Indians in January 2006. The park did not receive any formal comments from either tribe on the *Draft GMPA/EIS*.

Section 106 of the NHPA of 1966, as amended (16 U.S.C. 470, et seq.) requires that Federal agencies take into account the effect of their undertakings on properties listed in or eligible for listing in the NRHP. The District was listed in the NRHP in 1994. Consultation was initiated early in the planning process

between the NPS, the Tennessee Historical Commission (SHPO), and the ACHP. Public involvement procedures were followed that integrated the requirements of the NHPA with those of NEPA.

Consistent with 36 CFR 800, regulations implementing the NHPA, the NPS invited other interested groups and individuals to participate in the consultation process as consulting parties. The consulting parties have demonstrated substantial interest in this and previous planning efforts for Elkmont. In addition to the ACHP and the SHPO, the following tribes and organizations have participated in Section 106 consultations:

- The Eastern Band of Cherokee Indians
- The Chickasaw Nation
- The Elkmont Preservation Committee
- National Parks Conservation Association
- National Trust for Historic Preservation
- Sierra Club
- Smoky Mountain Hiking Club

Over the course of this planning effort the NPS has held seven meetings with the consulting parties. The last meeting was held in June 2008 to outline the MOA. Additional meetings and correspondence have occurred with the SHPO and ACHP. A summary of the consulting parties meetings is included in Table 5-1 of the *Final GMPA/EIS*. A record of correspondence received from the SHPO and ACHP following the publication of the *Draft GMPA/EIS* is included in the *Final GMPA/EIS (Volume 2, Chapter 6)*.

The NPS received 226 separate electronic, written, or verbal comments on the *Draft GMPA/EIS*. A Summary of Substantive Comments and NPS Responses are included in Appendix B of the *Final GMPA/EIS (Volume 2, Chapter 6)*. Among the substantive comments received from the public, some expressed the opinion that the park should remove all buildings from the District in accordance with the 1982 *GMP*. The NPS responded that because the District was listed in the NRHP in 1994 (after the 1982



*GMP* was completed) the NPS was required to reassess its prior decision, and to comply with requirements of the NHPA and NEPA in assessing alternative proposals for managing the District. Other commenter's felt the NPS was required to preserve all the District's historic buildings because of the District's listing in the NRHP. The NPS responded that although Section 106 of the NHPA requires the agency to take historic preservation values into consideration and to consult regarding actions that could affect historic properties, Section 106 does not mandate preservation in all instances. The NPS must also address measures to protect important natural resources and to consider social, economic, and other factors in its decision making.

Some commenter's felt the Elkmont cabins should be returned to the original owners and lease holders, while others felt the NPS should not extend special preference to former lease holders in determining the District's future management. The NPS noted that all prior leases have expired, and to return the cabins to the former lease holders or original owners and/or to grant them preferential consideration would not be consistent with the purpose of the original acquisition of the area in the 1930s as part of the park's establishment for the benefit of all citizens.

Some commenter's felt the Elkmont buildings are not historically significant, are poorly constructed, and/or do not meet the purposes of the park. Consequently they do not merit preservation. The NPS responded that the District's listing in the NRHP serves as the basis for recognition of its historical significance, and prompts the requirements for the NPS to comply with Section 106 of the NHPA in assessing the effects of proposed undertakings on the District. While the buildings were not originally constructed in most instances to endure for an extended period, and require substantial stabilization and restoration, the selected alternative offers the most balanced approach for preserving and maintaining a core group of buildings to assist in conveying the District's history and significance.

## CONCLUSION

Among the alternatives considered, the selected alternative best protects the diversity of park resources while also maintaining a range of quality visitor experiences, meets NPS purposes and goals for the Elkmont Historic District of Great Smoky Mountains National Park, and meets National Environmental Policy Act goals. The selected alternative will not result in the impairment of park resources and will allow the NPS to conserve park resources and provide for their enjoyment by visitors. The officials responsible for implementing the selected alternative are the Regional Director, Southeast Region, and the Superintendent, Great Smoky Mountains National Park.

Approved: David Vela

Date: 6-30-09

David Vela, Regional Director  
Southeast Region