

SUMMARY OF SMOKIES DEIS
and
CALL TO ACTION

The National Park Service (NPS) has released its long awaited Draft Environmental Impact Statement (DEIS) on the North Shore Road in the Great Smoky Mountains National Park (GSMNP).

Two types of **Preferred Alternatives** were selected. The Park Service ducked making an overall Preferred Alternative.

The **Environmentally Preferred Alternative** is the monetary settlement with Swain County, North Carolina. That is consistent with the Council on Environmental Quality (CEQ) standard that the environmentally preferred alternative is ordinarily “the alternative that causes the least damage to the biological and physical environment” and that “best protects, preserves, and enhances historic, cultural, and natural resources.”

The **Least Environmentally Damaging Practicable Alternative** is also the monetary settlement with Swain County. The US Army Corps of Engineers (USACE) requires that if it will be asked to issue a section 404 permit involving discharges of dredged or fill material, a Least Environmentally Damaging Practicable Alternative must be identified. The monetary settlement alternative was selected because “it would not involve fill” and “would have no effect on the aquatic environment.”

The five alternatives under consideration were:

1. No Action
2. A monetary settlement with Swain County of \$52 million
3. Building a Laurel Branch Picnic Area
4. Partial build of a road to Bushnell with day use area (8 miles)
5. Full build of a road to the vicinity of Fontana Dam (34.3 miles)

Cost

The estimated cost of a full build along the Northern Shore Corridor is at least \$590 million using 2006 dollars. This figure includes some mitigation costs, but most mitigation costs are not estimated. Maintenance costs during construction are also not included.

Major, Adverse, Long-Term or Permanent Impacts to the Park

Despite page after page of findings of major, adverse, long-term or permanent impacts, NPS chose not to state the agency’s overall preferred alternative. The following is a list of findings contained in the DEIS – direct quotes from the document are in ***bold, italics***:

1. Land Use – ***“The Northern Shore Corridor would have a major, adverse, long-term impact on land use in GSMNP.”*** Neither the full build or partial build alternative are in compliance with the park’s General Management Plan. Cuts and fills, a roadway, retaining walls, bridges, and vehicle traffic would be introduced in a natural environment. Potential wilderness would be reduced by more than 5,000 acres. Thirty-one miles of trail and a number of backcountry campsites would be obliterated. Trail access would be cut off during many years of road construction. There is no need to duplicate the service that NC 28 on the south shore of Fontana Lake provides. NC 28 is a superior road to the one under consideration and provides all the transportation capacity that is needed.

2. Visitor Use – ***“The baseline Northern Shore Corridor would have major, adverse, and long-term impacts to hiking.”*** The same impact would occur to horse use. Both casual and active visitors would experience these adverse impacts. ***“Over time, the loss of this backcountry area and the displacement of visitors to other areas would deteriorate resources, causing some active users to no longer recreate in GSMNP.”***

3. Visitor Experience – Impacts to solitude would be moderate to major, adverse, and long-term. The DEIS predicts that up to 15% of the vehicles using the road would be motorcycles, the noise from which would penetrate more deeply. ***“While the loss of some resources could be mitigated, the intangible values and experiences that some Park visitors desire during their visit could not. Overall, visitor experience would be adversely impacted as a result.”***

4. Archeological Resources – ***“The Northern Shore Corridor (both road types) would result in the most adverse impacts to archaeological resources. The baseline Northern Shore Corridor (Principal Park Road) would result in adverse, long-term impacts to six known archaeological resources. . .”***

5. Historical Resources – ***“The Northern Shore Corridor (both road types) would result in impacts to up to six historic structures, which are potentially eligible for listing in the National Register of Historic Places.”***

6. Air Quality – ***“Air quality impacts from construction activities are expected to be major and adverse for particulate matter with aerodynamic diameters of up to 10 microns (PM10) and sulfur dioxide (SO2), moderate and adverse for nitrogen oxides (NOx) . . . These activities may cause reductions in visibility and increased pollutant deposition that are considered major.”***

7. Wetlands – ***“Direct impacts to wetlands would occur within the construction footprint of a partial-build or build alternative due to a new roadway’s embankment (fill), or due to significant alteration of hydrology or vegetation.”*** The Northern Shore Corridor would affect between 10 and 15 wetlands, 13 of which are rare communities. ***“Impacts would be adverse and permanent.”***

8. Streams – A primitive park road would cross 131 streams and a principal park road would cross 141 streams. “**Direct impacts for both road types would be major, adverse, site-specific and permanent.**” These streams have an interim designation as Outstanding Resource Waters (ORW) by the State of North Carolina, and the designations will become permanent under regulations now being drafted. Any road construction could easily violate ORW standards. Maintaining the purity of the water in these streams should be a high priority both for NPS and North Carolina.

9. Acid Drainage – It is assumed that all portions of the build alternatives contain rock and soil capable of producing acid runoff. “**The impacts would be major (violations likely to occur), adverse, regional, long-term and permanent for the baseline Northern Shore Corridor. . . It is assumed that acidic runoff would be a chronic condition.**” Part of the proposed mitigation is to haul the acidic material to a dump elsewhere and encapsulate it in limestone. The DEIS fails to adequately address the fact that dump trucks hauling this material would subject downtown Bryson City to major traffic jams and regular toxic dust storm during the many years of construction.

10. Heavy Metals – “**Based on the geology for the Northern Shore Corridor, there would be major (violations likely to occur) impacts for the baseline Northern Shore Corridor. The potential for the impacts would exist in the short-term and long-term during construction, when the minerals could be exposed at unknown locations. There would be subsequent permanent impacts if these areas were not mitigated.**” The heavy metals are released by the same pyritic rock that causes acid drainage. While mitigation of acid drainage is partially addressed in the DEIS, mitigation of heavy metals is not addressed at all.

11. Fishing – Both the full build and partial build alternatives “**would have major, adverse, and long-term impacts to fishing (for casual and active visitors) related to boat and trail access changes.**” The DEIS fails to assess or even discuss impacts to the fishing resource from sharply increased fishing brought on by ease of access.

12. Aquatic Wildlife – “**The baseline Northern Shore Corridor would have adverse, major, site-specific, and permanent direct impacts to aquatic wildlife within streams for both the Primitive and Principal Park Roads. . . Indirect impacts are anticipated to be adverse, major, local, long-term and permanent.**”

13. Vegetation Communities – “**The Northern Shore Corridor (both road types) would result in major impacts to rare vegetation communities and major impacts to secure vegetation communities.**” “**The Partial-Build Alternative to Bushnell (Principal Park Road) would directly impact approximately 19.90 acres (8.05 ha) of rare vegetation communities and approximately 71.53 acres (28.95 ha) of secure vegetation communities.**” There is no discussion of the effects of fragmentation on plant communities, whether rare or not rare.

14. Terrestrial Wildlife – “**Impacts due to the direct loss of habitat are anticipated to be major, adverse, site-specific, and permanent. Impacts from ecosystem**

fragmentation are expected to be major, adverse, local, and permanent. Impacts due to noise would most likely be major, adverse, local, and long-term.”

15. Black Bears – Black bears avoid human activity, including road construction. Bears shift home ranges to avoid roads. Campgrounds and recreation centers attract bears and create nuisance bears. Construction of the road would cause the loss of hundreds of acres of bear habitat. *“As a result, the impacts for both types of roads would be classified as major, adverse, site-specific, and permanent due to loss of habitat within the construction footprints. Impacts due to habitat fragmentation, avoidance behavior, or increased roadside foraging would be major, adverse, local, long-term, and permanent for both types of roads.”*

16. Migratory Birds – The GSMNP harbors “source” populations of many migratory species. Detriments to populations in the park affect migratory bird abundance in adjoining regions of the eastern United States. Habitat loss is a leading cause of migratory bird declines. Any road creates more edge, which interior dwelling species avoid. Increased edge results in more nest predation and corridors attract predators such as brown-headed cowbirds. Noise disrupts vocal communication required for mating, foraging, predator detection and parent/nestling communications. *“Potential impacts due to habitat loss would be adverse, major, site-specific, and permanent. Indirect impacts from noise generated by construction activities and facility operations, habitat fragmentation, and edge effects would be adverse, major, local, and permanent.”*

17. Invasive Exotics – Construction and roads open the way for invasion by exotic species, both plant and animal. *“These impacts are anticipated to be adverse, major, regional, and permanent.”*

18. Aesthetics and Visual Resources – *“The baseline Northern Shore Corridor . . . would involve major impacts to the views from High Rocks, Shuckstack (located on the AT), AT (south of Shuckstack), Fontana Dam, and Proctor due to the visibility of portions of the exposed roadway. Any alternatives that would be visible from viewpoints along the AT would be considered a major impact. . .”*

19. Appalachian Trail – *“Adverse impacts to the AT, a potential historic property, would result where a partial-build or build alternative crosses the trail or where it is visible from the trail.”*

20. Summary of Impacts – The analysis in the DEIS ends with this summation of the adverse effects. *“Construction of any of the partial-build or build alternatives would result in adverse impacts to the geology, soils, backcountry campsites, trails, visual resources, cultural resources, and natural resources that cannot be avoided or fully mitigated. Aquatic areas that would be impacted by these alternatives may never be fully restored to their native community. Disturbance to a cultural resource site is permanent and cannot be fully mitigated. Existing topography and geology, once cut and/or filled, would be permanently changed with these alternatives. Changes to the aesthetic experience and visual resources would persist and cannot be fully mitigated*

unless the roads were abandoned and a substantial amount of time had elapsed. The loss of backcountry campsites and portions of Lakeshore Trail would not be avoided if the Northern Shore Corridor or the Partial-Build alternative to Bushnell were selected and cannot be fully mitigated. In the event of rare species that do not occur elsewhere in the Park, species mortality caused by the road would be irreversible and could not be mitigated.”

Amazing Leap of NPS. Having found so many major, adverse, and permanent impacts, NPS then makes an amazing and totally unsubstantiated leap to the conclusion: *“Based on the information obtained to date, which is presented in the impact analysis, none of the alternatives would harm the integrity of GSMNP or AT resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values. . . The Northern Shore Corridor is not anticipated to cause impairment to either GSMNP or the AT based on the information obtained to date.”* There is no articulation by NPS of its logic or rationale for this conclusion.

Information. The DEIS and its appendices are available at:
<http://www.northshoreroad.info/documents.htm>

WHAT YOU CAN DO

Comment For information about sending comments electronically visit:
<http://www.northshoreroad.info/comments.htm>

Or mail your comments to:

North shore Road Project
Great Smoky Mountains National Park
P.O. Box 30185
Raleigh, N.C. 27622

Please send a copy of your letter or e-mail to your Congressman and Senators. Regular mail copies should be sent to the local office and not the Washington, D.C. office.

POINTS TO STRESS

1. Support the monetary settlement alternative. A monetary settlement with Swain County meets the needs and purposes of the study, avoids all adverse impacts to the Park, and NPS has determined that it is the least environmentally damaging practicable alternative and the environmentally preferred alternative. The monetary settlement is the only alternative that will satisfy the request of the Swain County Commissioners, the Bryson City Board of Aldermen and the Governor of North Carolina.

2. Oppose all construction alternatives, both the partial-build and the full build. The park service has determined that all construction alternative will have major, adverse impacts on the park resources.

3. Stress the major, adverse, permanent or long-term impacts that any construction would have on every resource that the park service examined. See the quotes above from the DEIS for specific examples to include in your comments.

4. Expose the giant boondoggle. The Park Service states that the cost of construction will be at least \$590 million. That figure is equivalent to the annual budget short-fall of the entire national park system. On the other hand, the obligation of the Government could be settled with a payment of just \$52 million, a huge savings to U.S. taxpayers.

5. The monetary settlement protects the park, immediately benefits the people of Swain County and saves U.S. taxpayers hundreds of millions of dollars. The \$52 million settlement for Swain County invested at 5% would immediately provide \$2.6 million per year for the county and have no adverse environmental impacts. On the other hand, after 15 years of road construction and squandering at least \$590 million tax dollars, the park service says there will be only 223 new jobs.

6. The Appalachian Trail will suffer degradation from road construction. In addition, major portions of the Benton MacKaye Trail (BMT) within the Smokies would be obliterated. The newly created BMT is considered an alternate AT route.

7. Road construction will have major adverse impacts on the backcountry experience. The park will lose trails, backcountry campsites and the primitive hiking experience.

8. Road construction will cause the loss of potential wilderness in the park. Most of the lake shore area is currently managed as wilderness due to the high quality and remoteness of that part of the park. Both the road corridor and the strip between the road and the lake will be removed from wilderness consideration.

9. Demand that NPS honor the 1916 Organic Act by leaving the Park resources: “unimpaired for the enjoyment of future generations.” The park service has determined that every resource will suffer major, adverse, long-term or permanent impacts as a result of any road construction.

10. Take the big view of the Great Smoky Mountains National Park as a whole, not ripped open by a 34-mile scar gouged across it, with habitat destroyed and fragmented.

Remember that Quality Counts.