



# Crooked Creek Hiking Trail within Holcomb Bridge Unit Environmental Assessment



July 2019

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# PROJECT OVERVIEW

## INTRODUCTION

The National Park Service (NPS) is considering a project to construct an access trail to connect the Holcomb Bridge Unit of the Chattahoochee River National Recreation Area (CRNRA) to the proposed Crooked Creek Park of the City of Sandy Springs, Georgia. This document complies with the National Environmental Policy Act (NEPA) of 1969 and implementing regulations, 40 CFR Parts 100-1508; NPS Directors Order #12 Handbook, and *Conservation Planning, Environmental Impact Analysis, and Decision Making*; and Section 106 of the National Historic Preservation Act of 1966 as amended, and implementing regulations, 36 CFR Part 800.

## PURPOSE OF AND NEED FOR THE ACTION

The purpose of the project is to provide community members with a safe, official, access trail to the existing Holcomb Bridge Unit through the planned Crooked Creek Park. Currently, there is no official access to the Holcomb Bridge Unit. The City of Sandy Springs has obtained access from an adjacent parcel to establish an approximately 1-mile natural surface foot trail to connect the proposed Crooked Creek Park and the Holcomb Bridge Unit. This Environmental Assessment analyzes the Preferred Alternative (construction of the Crooked Creek Hiking Trail) and the no action alternative and their impacts on the environment.

## OVERVIEW OF THE ALTERNATIVES

Two alternatives are addressed in this Environmental Assessment:

- Alternative 1: No Action
- Alternative 2: Construction of the Crooked Creek Hiking Trail (Preferred Alternative)



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## APPENDIX 1: COORDINATION

Georgia Environmental Protection Division Consultation Letter

Georgia Department of Natural Resources Consultation Letter

Information for Planning and Consultation (IPaC) Species List for Fulton County, Georgia

Consultation Request from Chattahoochee River National Recreation Area (CRNRA)

Consultation Response from State Historic Preservation Office (SHPO)

CRNRA Superintendent Decision of Phase I Survey Not Required



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# CHAPTER 1: PURPOSE AND NEED

## INTRODUCTION

The National Park Service (NPS) is considering a project to construct a natural surface walking trail to connect the Holcomb Bridge Unit of the Chattahoochee River National Recreation Area (CRNRA) to the proposed Crooked Creek Park of the City of Sandy Springs, Georgia (Figure 1). The project is needed in order to provide safe, maintained, and controlled public access to the Holcomb Bridge Unit. This document complies with the National Environmental Policy Act (NEPA) of 1969 and implementing regulations, 40 CFR Parts 100-1508; NPS Directors Order #12 Handbook, and *Conservation Planning, Environmental Impact Analysis, and Decision Making*; and Section 106 of the National Historic Preservation Act of 1966 as amended, and implementing regulations, 36 CFR Part 800.

## PURPOSE OF AND NEED FOR ACTION

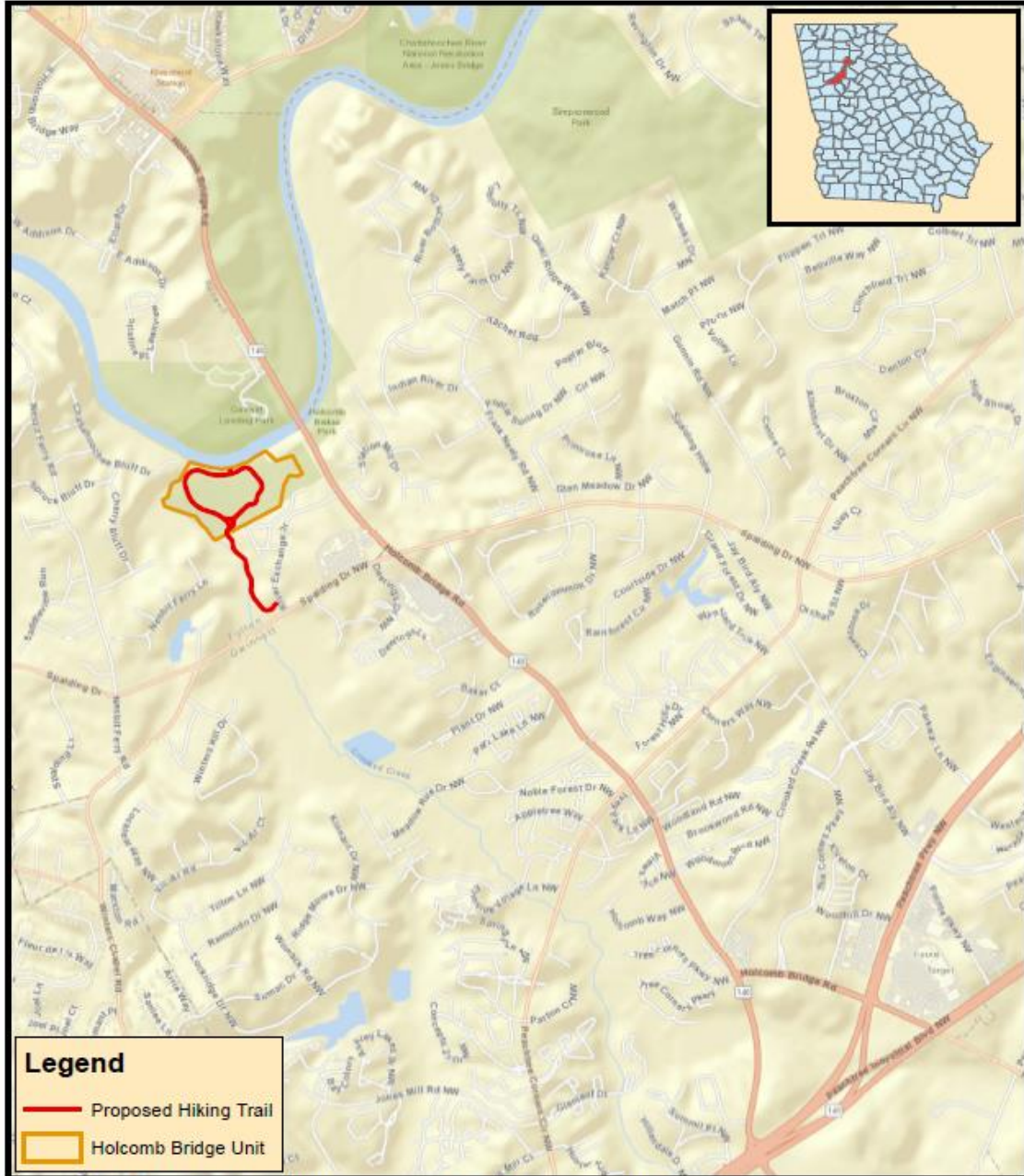
The purpose of the project is to provide a designated hiking trail that connects the Holcomb Bridge Unit to the proposed Crooked Creek Park. The project is needed in order to provide safe, maintained, and controlled public access to the Holcomb Bridge Unit and the proposed Crooked Creek Park. Currently, there is no official access to the Holcomb Bridge Unit. The City of Sandy Springs has obtained access from an adjacent parcel to establish an approximately 1-mile natural surface walking trail to connect the proposed Crooked Creek Park and the Holcomb Bridge Unit. The natural surface trail within the Holcomb Bridge Unit consists of an approximately 3,060 linear feet (LF) loop trail.

## PURPOSE AND SIGNIFICANCE OF THE PARK AND PROJECT BACKGROUND

The Holcomb Bridge Unit is approximately 33-acres of undisturbed forestland bordered by the Chattahoochee River to the north and Crooked Creek to the west. Currently there is no official access to the National Park Service-owned park. The proposed Crooked Creek Park would be constructed near the intersection of Spalding Drive and River Exchange Drive ultimately connecting to the Holcomb Bridge Unit through a 1-mile natural surface walking trail. Currently, there is an informal foot/game trail being used to access the Holcomb Bridge Unit. The proposed action discussed in this EA would make the existing informal foot trail a more accessible and safer greenspace for public use and provide a connection between the Holcomb Bridge Unit and the proposed Crooked Creek Park.

## ISSUES AND IMPACT TOPICS

Issues describe problems or concerns associated with current impacts from environmental conditions as well as problems that may arise from the implementation of either of the alternatives. The issues and concerns identified during internal scoping were grouped into impact topics that are discussed in “Chapter 3: Affected Environment” and are analyzed in “Chapter 4: Environmental Consequences.” Specific impact topics were developed for discussion focus, and to allow comparison of the environmental consequences of each alternative. These impact topics were identified based on federal laws, regulations, and Executive Orders; 200 NPS *Management Policies, 2006*; and NPS knowledge of limited or easily impacted resources. A brief rationale for the selection of each impact topic is given below, as well as the rationale for dismissing specific topics from further consideration.



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## **Waters and Wetlands**

### *Jurisdictional Waters of the United States*

No federally regulated wetlands occur within the 30-foot survey corridor for the proposed Crooked Creek Hiking Trail. However, online review of National Wetland Inventories (NWI) and Federal Emergency Management Agency (FEMA) maps show the potential of wetlands in the project area. Because impacts could occur to Jurisdictional Waters of the United States, this resource area is addressed as an impact topic in this EA.

### *National Park Service Wetlands*

Review of NPS delineated wetlands map shows NPS wetlands occurring within the Holcomb Bridge Unit. Because impacts could occur to NPS wetlands, this resource area is addressed as an impact topic in this EA.

### *Buffered State Waters*

The Chattahoochee River borders the northern boundary of the Holcomb Bridge Unit and is considered a secondary trout stream per the Georgia Environmental Protection Division's (GAEPD) trout stream designation. Because impacts could occur to state-buffered waters, this resource area is addressed as an impact topic in this EA.

## **Vegetation**

Actions directly related to constructing the Crooked Creek Hiking Trail would require selective vegetation trimming to a 10-foot-wide area inclusive of the existing, informal, foot trail. As impacts to vegetation would occur, this resource area is addressed as an impact topic in this EA.

## **Soils**

Construction of the natural surface walking trail has the potential to affect soil erosion through minor grading, vegetation removal, and soil compaction. As impacts to soil could occur, this resource area is addressed as an impact topic in this EA.

## **Visitor Use and Experience**

Construction of the Crooked Creek Hiking Trail would affect visitor use by increasing trail and park accessibility, as well as creating a safer outdoor environment. As impacts would occur to visitor use and experience, this resource area is addressed as an impact topic in this EA.

## **Wildlife and Wildlife Habitat**

The 33-acre Holcomb Bridge Unit likely serves as a habitat for fauna associated with the southern inner piedmont ecoregion including, but not limited to, white-tailed deer (*Odocoileus virginianus*), North American beaver (*Castor canadensis*), North American raccoon (*Procyon lotor*), and a wide variety of songbirds. As impacts would occur to wildlife and wildlife habitat, this resource area is addressed as an impact topic in this EA.



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## Special-Status Species

There are five species of fauna listed in the USFWS IPaC database for Fulton County, Georgia: Gulf moccasinshell (*Medionidus penicillatus*), oval pigtoe (*Pleurobema pyriforme*), purple bankclimber (*Elliptioideus sloatianus*), shinyrayed pocketbook (*Lampsilis subangulata*), and Cherokee darter (*Etheostoma scotti*). IPaC lists one species of flora, Michaux's Sumac (*Rhus michauxii*), which has a range that includes the project site. Critical habitat has been designated for the four mussel species, but it is not located within, or adjacent to, the project area. Critical habitat has not been designated for the Cherokee darter or Michaux's sumac. Additionally, there are four (4) state-listed fauna and flora species occurring within a three-mile radius of the project site; Chattahoochee crayfish (*Cambarus howardi*), pink ladyslipper (*Cypripedium acaule*), bay starvine (*Schisandra glabra*), and Georgia aster (*Symphyotrichum georgianum*). As impacts could occur to special-status species and their habitat, this resource area is addressed as an impact topic in this EA.

## Soundscapes

The implementation of the preferred action would create a more accessible greenspace for the public. This increased accessibility would likely increase visitation to the park. As impacts could occur to the existing soundscape, this resource area is addressed as an impact topic in this EA.

## Cultural Resources

The National Historic Preservation Act (NHPA), NEPA, and Director's Order #12 require the consideration of impacts on any cultural resources that might be affected by an undertaking. The NHPA, in particular, requires the consideration of effects on cultural resources either listed in, or eligible to be listed in, the National Register of Historic Places (NRHP). Cultural resources include archeological resources, cultural landscapes, historic structures and districts, ethnographic resources, objects and museum collections (prehistoric and historic objects, artifacts, works of art, archival documents, and natural history specimens), and traditional cultural properties. As impacts could occur to cultural resources, this resource area is addressed as an impact topic in this EA.

## IMPACT TOPICS DISMISSED FROM FURTHER ANALYSIS

According to Director's Order #12 and its accompanying handbook (NPS 2015), analysis in an EA should focus on significant issues (i.e., pivotal issues or issues of critical importance) and only discuss insignificant issues briefly. As a general rule, issues should be retained for consideration and discussed in detail if:

- the environmental impacts associated with the issue are central to the proposal or of critical importance;
- a detailed analysis of environmental impacts related to the issue is necessary to make a reasoned choice between alternatives;
- the environmental impacts associated with the issue are a big point of contention among the public or other agencies; or
- there are potentially significant impacts to resources associated with the issue.

The following issues and topics did not meet the above criteria as they are not potentially significant, not critical to choosing between alternatives, and are not controversial. Therefore, they were eliminated from further analysis in this EA. A brief rationale for dismissal is provided for each topic.

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## **Air Quality**

The 1963 Clean Air Act, as amended (42 USC 7401 et seq.), requires federal land managers to protect air quality in national parks. The project area is located in Fulton County, which is in attainment for all criteria pollutants with the exception of 8-hour Ozone for 2018. During construction, dust and vehicle emissions related to construction activities and transport of construction materials and personnel may temporarily affect local air quality. Air movement would rapidly dissipate hydrocarbons, nitrogen oxide, and sulfur dioxide emissions. Overall, degradation to local air quality would be slight and temporary as a result of dust generated from construction activities, but these effects would be localized and minimal. The preferred alternative would not significantly affect the city's current level of air quality; therefore, this impact topic was dismissed from further analysis.

## **Water Quality**

The 1972 Federal Water Pollution Control Act, as amended by the Clean Water Act of 1977, is a national policy to restore and maintain the chemical, physical, and biological integrity of the nation's waters; enhance the quality of water resources; and prevent, control, and abate water pollution. The construction of the Crooked Creek Hiking Trail would not significantly alter the existing landscape; therefore, it would not alter the current storm flow pattern. There would be minimal to no on-site grading. The Crooked Creek Hiking Trail would improve upon the already existing foot path. Substrate used for the natural surface hiking trail would allow stormwater to continue to flow naturally across the landscape. Additionally, during construction of the Crooked Creek Hiking Trail, all appropriate BMPs would be used to prevent the movement of sediment within the project area. As the proposed action would not alter existing stormwater runoff or contours, this impact topic was dismissed from further analysis.

## **Socioeconomics**

NEPA requires an analysis of impacts on the human environment, which includes economic, social, and demographic elements in the affected area. Construction of the Crooked Creek Hiking Trail may bring a short-term need for additional personnel at the site, but this addition would be minimal and would not affect the surrounding community's overall population, income, and employment base. The proposed action would not appreciably affect local businesses or other agencies. Implementation of the proposed action could provide a beneficial impact on the economies of nearby areas (e.g., minimal increases in employment opportunities for the construction workforce and revenues for local businesses and government generated from construction activities and workers). Any increase, however, would be negligible. Therefore, socioeconomics was dismissed as an impact topic.

## **Climate Change**

Climate change refers to any significant changes in average climatic conditions (such as mean temperature, precipitation, or wind) or variability (such as seasonality and storm frequency) lasting for an extended period (decades or longer). Recent reports by the U.S. Climate Change Science Program, the National Academy of Sciences, and the United Nations Intergovernmental Panel on Climate Change provide evidence that climate change is occurring as a result of rising greenhouse gas emissions and could accelerate in the coming decades.

While climate change is a global phenomenon, it manifests differently depending on regional and local factors. General changes that are expected to occur in the future as a result of climate change include hotter, drier summers; warmer winters; warmer ocean water; higher ocean levels; more severe wildfires; degraded air quality; more heavy downpours and flooding; and increased drought. Climate change is a far-reaching, long-term issue that could affect the park and its resources, visitors, and management. Although some

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effects of climate change are considered known or likely to occur, many potential impacts are unknown. Much depends on the rate at which the temperature would continue to rise and whether global emissions of greenhouse gases can be reduced or mitigated. Climate change science is a rapidly advancing field, and new information is being collected and released continually.

Construction activities associated with implementation of the preferred alternative would contribute to increased greenhouse gases emissions, but such emissions would be short term, ending with the cessation of construction, and it is not possible to meaningfully link the greenhouse gases emissions of such individual project actions to quantitative effects on regional or global climatic patterns. Any effects on climate change would not be discernible at a regional scale. Therefore, this impact topic was dismissed from further evaluation.



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## CHAPTER 2: ALTERNATIVES

NEPA requires federal agencies to explore a range of reasonable alternatives aimed at addressing the purpose of and need for the proposed action. Reasonable alternatives include alternatives that are “technically and economically practical or feasible and meet the purpose and need of the proposed action” (43 CFR § 46.420(b)). The alternatives under consideration must include a no-action alternative as prescribed by CEQ regulations for implementing NEPA (40 CFR Part 1502.14).

The alternatives analyzed in this document, in accordance with NEPA, are based on the result of internal and agency scoping. Alternatives and actions that were considered but would not be technically or economically feasible, would not meet the purpose of and need for the project, would create unnecessary or excessive adverse impacts on resources, or would conflict with the overall management of the park or its resources were dismissed from detailed analysis. These alternatives or alternative elements and their reasons for dismissal are discussed at the end of this chapter.

Pond explores and objectively evaluates two alternatives in this EA:

- Alternative 1: No Action
- Alternative 2: Construction of the Crooked Creek Hiking Trail (Preferred Alternative)

### ALTERNATIVE 1: NO ACTION

Under Alternative 1, no construction would occur. The public would not have a safe and maintained access trail to the nearby, natural amenities offered by the Holcomb Bridge Unit. The Holcomb Bridge Unit would remain inaccessible by the public.

### ALTERNATIVE 2: Construction of the Crooked Creek Hiking Trail (PREFERRED ALTERNATIVE)

Under Alternative 2, a safe, natural surface, walking trail would be constructed creating official access to the Holcomb Bridge Unit from the planned Crooked Creek Park. The Crooked Creek Hiking Trail would span across two properties (see Figure 1); the Holcomb Bridge Unit operated by NPS and the adjacent property purchased by the City of Sandy Springs to connect the Holcomb Bridge Unit to the planned Crooked Creek Park. The proposed natural surface trail would be approximately 3 feet wide. The NPS action would be limited to the issuance of a Special Use Permit to the City of Sandy Springs to grant access for trail construction. All trail construction and maintenance would be the responsibility of the City of Sandy Springs. The trail would follow an existing, yet informal, trail utilized by fishermen and other community members to access the Chattahoochee River. The layout of the preferred alternative only varies from the informal trail in specific areas to minimize impacts to resources. The preferred alternative would require the selective cutting and trimming of a 10-foot-wide area which would include the proposed trail. No mass grading would occur as a result of this project. The scope of analysis for this EA is limited to actions proposed to occur on the Holcomb Bridge Unit property (i.e., construction and use of the improved trail).

### MITIGATION MEASURES OF THE PREFERRED ACTION ALTERNATIVE

The NPS places strong emphasis on avoiding, minimizing, and mitigating potentially adverse environmental impacts. To help ensure the protection of natural and cultural resources and the quality of

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the visitor experience, the following protection measures would be implemented as part of the proposed action.

### **Waters and Wetlands**

- The Crooked Creek Hiking Trail has been designed to avoid all federally regulated wetland resources delineated within the project area.
- Best management practices would be used during construction to further avoid impacts on adjacent federally regulated wetlands from the construction of the Crooked Creek Hiking Trail.

### **Vegetation**

- Selective vegetation trimming would be contained within a 10-foot-wide area to be inclusive of the 3-foot-wide natural surface trail.
- Vegetation clearing limits would be clearly noted on construction documents and marked in the field to minimize the disturbance and alteration of vegetation.
- As a preventative measure to avoid the promotion of invasive species, a protocol would be developed for all equipment used to help prevent the spread of invasive species to, or from, the site.

### **Soils**

- Erosion containment controls, such as silt fencing, sediment traps, and straw would be used to prevent movement of sediment on site, as feasible per the 2016 Georgia Green Book specifications.
- The Crooked Creek Hiking Trail has been designed to follow the existing informal foot path and only deviate from the existing path where necessary to minimize impacts to resources.
- There would be minimal grading and all materials used would be natural surface components allowing the natural state of the project area to persist.
- Temporary construction impacts would be avoided and minimized by complying with applicable regulations under local, state, and federal laws.
- The City of Sandy Springs would require a Land Disturbance Permit (LDP) due to more than 1,000 square feet of ground disturbance. The LDP requires the applicant to comply with the Georgia Stormwater Manual, updated and approved by the State, January 2016. Additionally, this permit requires, at minimum, a pre-construction meeting inspection prior to any and all land disturbing activities and a final site inspection when all site work is completed.

### **Visitor Use and Experience**

- Signage and construction fencing would be placed at the parking lot and along the trail route to discourage the public from entering the construction area.

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## **Wildlife and Wildlife Habitat**

- Alteration of existing wildlife habitat would be minimized by limiting selective vegetation trimming to the 10-foot-wide area to be inclusive of the proposed trail.
- Wildlife disturbance would be minimized by encouraging the public to stay on the maintained, official, trail to access the Holcomb Bridge Unit.

## **Special-status Species**

- Special-status species are not present within the disturbance footprint of the proposed trail. Mitigation measures identified in the Vegetation sub-heading (above) would minimize disturbance of suitable habitat for special-status species.

## **Soundscapes**

- Increased noise in the area potentially effecting the residents at the apartment complex would be mitigated through leaving the greenspace between the proposed Crooked Creek Park trail and the apartment complex as a buffer.
- Use of the Holcomb Bridge Unit would continue to comply with NPS soundscape preservation and noise management requirements (i.e., NPS Directors Order #47: Soundscape Preservation and Noise Management, and Management Policies 2006).

## **Cultural Resources**

- A vegetative buffer would be maintained or installed along the boundary of 6020 Spaulding Drive.
- An archaeological monitor would be present during portions of construction involving soil disturbance. In the event that archaeological materials are discovered during construction, then all ground disturbing activities in the vicinity would cease and the State Historic Preservation Office (SHPO) would be contacted.



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## CHAPTER 3: AFFECTED ENVIRONMENT

The “Affected Environment” chapter describes the existing conditions for environmental elements and elements of the human environment that would be affected by the implementation of the alternatives considered in this EA. The components addressed include wetlands, vegetation, soils, visitor use and experience, wildlife and wildlife habitat, soundscapes, and cultural resources. Impacts for each of these topics are analyzed in “Chapter 4: Environmental Consequences.”

### WATERS AND WETLANDS

Wetlands include areas inundated or saturated by surface or groundwater for a sufficient length of time during the growing season to develop and support characteristic soils and vegetation. A delineation of federally regulated wetlands within the 30-foot survey corridor to be inclusive of the proposed Crooked Creek Hiking Trail was completed in February 2018. There were no federally jurisdictional wetlands delineated within the 30-foot survey corridor within the Holcomb Bridge Unit.

The U.S. Department of Agriculture mapped soils for the areas where wetlands are present are “Cartecay-Toccoa complex.” This soil is characterized as occasionally flooded and is associated with floodplains. The soils sampled in the wetland have characteristics consistent with a depleted/reduced matrix with redox features (USDA-NRCS 2016).

### Jurisdictional Waters of the United States

Pond conducted their field delineations of federally regulated waters and wetlands by using the 1987 United States Army Corp of Engineers Wetland Delineation Manual as well as its accompanying Eastern Mountains and Piedmont supplement (U.S. Army Corps of Engineers. 2012. Interim regional supplement to the Corps of Engineers wetland delineation manual: Eastern Mountains and Piedmont Region).

For purposes of compliance with Executive Order 11990, the NPS would use “Classification of Wetlands and Deepwater Habitats of the United States” (FWS/OBS-79/31; Cowardin et al. 1979) as the standard for defining, classifying, and inventorying wetlands.

NPS uses the Federal Geographic Data Committee (FGDC) Wetlands Classification Standard that is adapted from the Cowardin et al. (1979) Wetlands Classification System. In the FGDC examples, three indicators – hydrophytic vegetation, undrained hydric soil, and wetland hydrology; two indicators – hydrophytic vegetation and wetland hydrology or undrained hydric soil and wetland hydrology; and one indicator – wetland hydrology, respectively, would be used to make the identification based on the features available.

### State-buffered Waters

The Georgia Erosion and Sedimentation Act of 1975 and its subsequent amendments require that primary and secondary trout streams maintain an undisturbed riparian buffer of 50 feet, and all other streams maintain a minimum buffer of 25 feet (measured from where vegetation is wrested by normal stream flow). Per the Georgia Environmental Protection Division (GAEPD) trout stream designations, the Chattahoochee River is considered a secondary trout stream and would require a 50-foot buffer.

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## VEGETATION

The project area consists primarily of mixed-pine hardwoods with a relatively open understory. Common species found on the project site include multiple varieties of greenbrier (*Smilax* spp.), American beech (*Fagus grandifolia*), Chinese privet (*Ligustrum sinense*), loblolly pine (*Pinus taeda*), red maple (*Acer rubrum*), azalea (*Rhododendron canescens*), and various oak species (*Quercus* spp.).

## SOILS

The Natural Resources Conservation Service (NRCS) Web Soil Survey database indicates that soils within the project area consist of nine soil mapping units (USDA-NRCS 2016). Soils exhibiting similar characteristics and falling within certain defined limits are classified together as a soil series. A soil series is a part of a soil's taxonomy that includes order, great group, subgroup, family and series. Soil phases are used for subdividing series into specific units that are significant for practical use and management (i.e. surface texture, slope, degree of erosion, stoniness). A mapping unit is a grouping of soils by their natural landscape and soil patterns. Most soil mapping units shown on detailed soil maps are phases of soil series. The soil map units within the project area are listed in Table 1. Soil descriptions are based on the text of the soil surveys and the NRCS Web Soil Survey (USDA-NRCS 2016).

**Table 1. Soils mapping units located within the project area.**

Map Unit Symbol	Mapping Unit Name	Drainage Characteristics
CaA	Cartecay-Toccoa complex, 0 to 2% slopes, occasionally flooded	Somewhat poorly drained
CeC2	Cecil sandy loam, 6 to 10% slopes, moderately eroded	Well drained
WbA	Wehadkee-Cartecay complex, 0 to 2% slopes, occasionally flooded	Poorly drained
WcB	Wickham sandy loam, 2 to 6% slopes	Well drained
Bfs	Buncombe loamy fine sand	Excessively drained
Cfs	Chewacla silt loam, 0 to 2% slopes, frequently flooded	Somewhat poorly drained
Cus	Congaree loam	Well drained
CYD2	Cecil sandy loam, 10 to 15% slopes, eroded	Well drained
WgB2	Wickham sandy loam, 2 to 6% slopes	Well drained

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## VISITOR USE AND EXPERIENCE

Holcomb Bridge Unit is approximately 33-acres of undisturbed forestland bordered by the Chattahoochee River to the north and Crooked Creek on the west. There is no official access to the National Park Service-owned park. Currently, there is an informal foot/game trail being used to access the Holcomb Bridge Unit. The proposed action discussed in this EA would create a safe, official, trail to be utilized by the public.

## WILDLIFE AND WILDLIFE HABITAT

The 33-acre Holcomb Bridge Unit likely serves as a habitat for fauna associated with the southern inner piedmont ecoregion including, but not limited to, white-tailed deer (*Odocoileus virginianus*), North American beaver (*Castor canadensis*), North American raccoon (*Procyon lotor*), and a wide variety of songbirds.

## SPECIAL-STATUS SPECIES

There are five species of fauna listed in the USFWS IPaC database for Fulton County, Georgia: Gulf moccasinshell (*Medionidus penicillatus*), oval pigtoe (*Pleurobema pyriforme*), purple bankclimber (*Elliptioideus sloatianus*), shinyrayed pocketbook (*Lampsilis subangulata*), and Cherokee darter (*Etheostoma scotti*). IPaC lists one species of flora, Michaux's Sumac (*Rhus michauxii*), which has a range that includes the project site. Critical habitat has been designated for the four mussel species, but it is not located within, or adjacent to, the project area. Critical habitat has not been designated for the Cherokee darter or Michaux's sumac.

Coordination with the Wildlife Resources Division (WRD) within the Georgia Department of Natural Resources (GADNR) provided known population occurrences of state-listed flora and fauna within a three-mile radius of the proposed project area in Fulton County, Georgia (See correspondence in Appendix 1 and species in Table 2). This coordination provided one fauna species, Chattahoochee Crayfish (*Cambarus howardi*), and three flora species; pink ladyslipper (*Cypripedium acaule*), bay starvine (*Schisandra glabra*), and Georgia aster (*Symphyotrichum georgianum*).

In coordination with CRNRA biologist, Allyson Reed, it was determined that suitable habitat is present for bay starvine, but not for any of the other species. A species-specific survey for bay starvine was conducted 13 December 2018 by CRNRA biologist Allyson Reed. This survey did not identify the presence of any bay starvine within, or adjacent to, the proposed trail path.



**Table 2. Federal and State-listed fauna and flora species occurring in Fulton County, Georgia.**

Common Name	Scientific Name	Species Status	Habitat Requirements	Suitable Habitat within Project Area	Affect Determination
<b>Fauna</b>					
Chattahoochee crayfish	<i>Cambarus howardi</i>	ST	riffle areas of streams; in rocks with swift-flowing water	no habitat within project area	no adverse effect
Gulf moccasinshell	<i>Medionidus penicillatus</i>	SE	large rivers to small creeks; found in a variety of substrates	no habitat within project area	no effect
oval pigtoe	<i>Pleurobema pyriforme</i>	FE	medium-sized streams to large rivers with sandy and gravelly substrates	no habitat within project area	no effect
purple bankclimber	<i>Elliptioideus sloatianus</i>	FT	small to large rivers with sandy to silty substrates	no habitat within project area	no effect
shinyrayed pocketbook	<i>Lampsilis subangulata</i>	SE	medium sized creeks to large rivers in sand substrates in slow to swift flowing water	no habitat within project area	no effect
Cherokee darter	<i>Etheostoma scotti</i>	ST	small to medium-sized creeks with moderate current and rocky substrates	no habitat within project area	no effect
<b>Flora</b>					
pink ladyslipper	<i>Cypripedium acaule</i>	SU	upland oak-hickory-pine forests; piney woods	no habitat within project area	no adverse effect
bay starvine	<i>Schisandra glabra</i>	ST	Moist, deciduous hardwood forests, often with beech, usually on lower slopes, stream terraces, and floodplains	suitable habitat is present; species-specific survey conducted, and no bay starvine was present along trail	no significant adverse effect
Georgia aster	<i>Symphyotrichum georgianum</i>	ST	upland oak-hickory-pine forests and openings; sometimes with <i>Echinacea laevigata</i> or over amphibolite	no habitat within project area	no adverse effect
Michaux sumac	<i>Rhus michauxii</i>	FE	dry, open, rocky, or sandy woodlands over mafic bedrock	no habitat within project area	no effect

\*SE = State Endangered, ST = State Threatened, SU = State Unusual, FE = Federally Endangered, FT = Federally Threatened

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## **SOUNDSCAPES**

NPS has specific requirements for soundscape preservation and noise management which serve to protect and maintain the NPS mission and management purposes of each park or designated area (i.e., NPS Directors Order #47: Soundscape Preservation and Noise Management, Management Policies 2006). There is currently no official access to the Holcomb Bridge Unit and use of the site occurs via existing, informal trails; therefore, visitor use of the Holcomb Bridge Unit is assumed to be low and infrequent. The current level of use is expected to generate very low levels of noise associated with pedestrian recreation which is appropriate and in compliance with the NPS soundscape and noise requirements. The Holcomb Bridge Unit is located adjacent to roadways and an apartment complex. Noises from these off-site areas dominate the soundscape within the project area. The current use of the existing, informal trails creates minimal noise relative to the off-site noise from adjacent roadways and developments.

## **CULTURAL RESOURCES**

Per the online NRHP spatial data (“NRHP” 2014), there are no known NRHP-listed resources on, or adjacent to, the Holcomb Bridge Unit. Through coordination with SHPO, one structure was identified, located at 6020 Spalding Drive, which was constructed circa 1960 and has a NRHP-listing status of unknown (Appendix 1: SHPO Response Letter, 26 March 2019). Based on the lack of documented resources in the project vicinity and the nature of the proposed project (i.e., minor disturbance associated with the improvement of an existing hiking trail), the CRNRA Superintendent determined that a Phase I cultural resource survey was not warranted (Appendix 1: NPS Email Correspondence, 17 June 2019).

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## **CHAPTER 4: ENVIRONMENTAL CONSEQUENCES**

### **GENERAL METHODOLOGY FOR ESTABLISHING IMPACTS**

In accordance with CEQ regulations, direct, indirect, and cumulative impacts are described (40 CFR 1502.16), and the impacts are assessed in terms of context and intensity (40 CFR 1508.27). Where appropriate, mitigating measures for adverse impacts are also described and incorporated into the evaluation of impacts.

Environmental consequences are determined by describing how the existing condition of a resource would change, either negatively or positively, as a result of implementing any of the alternatives under consideration. Analysis includes the consideration of the context (setting), type (beneficial or adverse), intensity (strength), and duration (short or long term) of the direct, indirect, and cumulative effects of the alternatives.

Context is the setting, situation, or circumstances surrounding a particular resource (40 CFR 1508.27(a)). Context provides a backdrop against which the intensity of impacts can be applied to understand their importance. The geographic study area (or area of analysis) for this assessment is the proposed hiking trail provided in Figure 2. The area of analysis may extend beyond the project area boundaries for some cumulative impact assessments. The specific area of analysis for each impact topic is defined at the beginning of each topic discussion.

Intensity is the severity or magnitude of an impact (40 CFR 1508.27(b)). Assessing the intensity of impacts on a specific resource is linked to the context in which that resource is found. The new NPS NEPA handbook (NPS 2015) removed the use of intensity definitions in an EA to define impacts or substitute for impact analysis. Instead, the analysis discloses the existing conditions of resources and documents the “hard look” standard in a narrative that discusses the impacts of the alternatives.

### **CUMULATIVE IMPACTS ANALYSIS METHOD**

Cumulative impacts are defined as “the impact on the environment which results from the incremental impact of the action when added to other past, present, or reasonably foreseeable future actions regardless of what agency (federal or nonfederal) or person undertakes such other actions” (40 CFR 1508.7).

Cumulative impacts were determined for each impact topic by combining the impacts of the alternative being analyzed and other past, present, and reasonably foreseeable actions that would also result in beneficial or adverse impacts. The evaluation of cumulative impacts is based on a general description of the projects.



Figure 2  
Aerial Map

Crooked Creek Hiking Trail  
Fulton County  
April 2019

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## **WATERS AND WETLANDS**

### **Methodology and Assumptions**

Impacts on wetlands could be direct or indirect as well as beneficial or adverse. Direct impacts are those that physically alter hydrology, vegetation, or soils as a result of the implementation of an activity, while indirect impacts are those that may occur inadvertently during or after an activity or in areas adjacent to the project area.

Direct and indirect impacts can be either adverse, beneficial, or negligible. Adverse impacts are those that alter or disrupt character-defining features that allow a wetland to function properly. Beneficial impacts are those that promote the retention of important characteristics or settings associated with a wetland. Negligible impacts are those that are at the lowest level of detection or are barely perceptible.

Pond conducted their delineation of federally regulated waters and wetlands by using the 1987 United States Army Corp of Engineers Wetland Delineation Manual as well as its accompanying Eastern Mountains and Piedmont supplement (U.S. Army Corps of Engineers. 2012. Interim regional supplement to the Corps of Engineers wetland delineation manual: Eastern Mountains and Piedmont Region).

NPS wetland delineations were provided by NPS staff through their NPS Holcomb Bridge Unit map. NPS uses the Federal Geographic Data Committee (FGDC) Wetlands Classification Standard that is adapted from the Cowardin et al. (1979) Wetlands Classification System. In the FGDC examples, three indicators – hydrophytic vegetation, undrained hydric soil, and wetland hydrology; two indicators – hydrophytic vegetation and wetland hydrology or undrained hydric soil and wetland hydrology; and one indicator – wetland hydrology, respectively, would be used to make the identification based on the features available. This is a stricter wetland delineations protocol than the USACE method.

State-buffered waters include the Chattahoochee River which is designated as a secondary trout stream per GAEPD. With the designation of a secondary trout stream, the Chattahoochee River would require a 50-foot buffer.

### **Study Area**

The study area for waters and wetlands encompasses the 30-foot-wide survey corridor to be inclusive of the proposed Crooked Creek Hiking Trail.

### **Alternative 1: No Action**

#### *Analysis*

Under the No Action Alternative, no construction of the Crooked Creek Hiking Trail would take place, therefore no impacts to waters or wetlands would occur.

#### *Cumulative Impacts*

No additional projects are planned within the Holcomb Bridge Unit that would affect waters or wetlands in the area; therefore, no cumulative impacts are expected.

#### *Conclusion*

Under the No Action Alternative, there would be no impacts to waters or wetlands.

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## **Alternative 2: Construction of the Crooked Creek Hiking Trail (Preferred Alternative)**

### *Analysis*

#### **Jurisdictional Waters of the United States**

Under Alternative 2, construction equipment and workers would access the project area from the proposed Crooked Creek Park trailhead on River Exchange Drive. Construction equipment and workers would not need to pass through the adjacent federally regulated wetlands. There are no federally regulated waters or wetlands located within the 30-foot survey corridor of the Holcomb Bridge Unit. Due to full avoidance, there would be no short or long-term adverse impacts to federally regulated waters or wetlands. Additionally, all appropriate BMPs would be used during construction to further prevent impacts to wetlands and waters adjacent to the project area.

#### **State-buffered Waters**

Per the GAEPD trout stream designations, the Chattahoochee River is listed as a secondary trout stream which requires a 50-foot buffer from wretched vegetation. The trout stream 50-foot buffer variance requirement would be triggered by trail construction.

### *Cumulative Impacts*

No additional projects are planned within the Holcomb Bridge Unit that would affect waters or wetlands in the area; therefore, no cumulative impacts are expected.

### *Conclusion*

Federally regulated waters and wetlands would not experience short or long-term adverse impacts because there are no federally regulated waters or wetlands located within the 30-foot survey corridor on the Holcomb Bridge Unit. State-buffered waters would be affected in that the 50-foot trout stream buffer requirement would be triggered with the construction of the natural-surface trail; however, no adverse impacts are anticipated due to compliance with the 50-foot buffer regulation. No cumulative impacts are expected.

## **VEGETATION**

### **Methodology and Assumptions**

Impacts on vegetation could be direct or indirect. Direct impacts are those that physically alter or disturb vegetation as a result of the implementation of an activity, while indirect impacts are those that may occur inadvertently during or after an activity. Direct and indirect impacts can be either adverse, beneficial, or negligible. Adverse impacts are those that alter or remove vegetation. Beneficial impacts are those that promote the growth and survival of vegetation.

### **Study Area**

The study area for vegetation encompasses the 30-foot-wide survey corridor to be inclusive of the proposed Crooked Creek Hiking Trail.

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## **Alternative 1: No Action**

### *Analysis*

Under the No Action Alternative, no vegetation would be altered on the project site.

### *Cumulative Impacts*

No additional projects are planned within the Holcomb Bridge Unit that would affect vegetation in the area; therefore, no cumulative impacts are expected.

### *Conclusion*

There would be no impacts on vegetation within the project area under the No Action Alternative. No cumulative impacts on vegetation are expected.

## **Alternative 2: Construction of the Crooked Creek Trail (Preferred Alternative)**

### *Analysis*

Under Alternative 2, selective vegetation trimming would occur along the 10-foot-wide clear zone to be inclusive of the proposed 3-foot-wide natural surface trail. Existing vegetation would remain intact as much as practicable while still maintaining a safe, accessible trail.

### *Cumulative Impacts*

No additional projects are planned within the Holcomb Bridge Unit that would affect vegetation in the area; therefore, no cumulative impacts are expected.

### *Conclusion*

Construction of the Crooked Creek Hiking Trail would have no short or long-term significant adverse impacts on the vegetation within the project area. Vegetation loss would be limited to areas necessary within the 10-foot-wide clear zone along the already established informal foot path. No significant cumulative impacts on vegetation are expected.

## **SOILS**

### **Methodology and Assumptions**

Following the review of available data, impacts on soils were evaluated in terms of disturbance, erosion susceptibility, and compaction potential. Short- and long-term impacts were assessed by comparing available information on existing topography, soils, and geologic conditions and processes with available information on construction and operation of the project.

### **Study Area**

The study area for soils encompasses the 30-foot-wide survey corridor to be inclusive of the proposed Crooked Creek Hiking Trail.



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## **Alternative 1: No Action**

### *Analysis*

Under the No Action Alternative, no impacts to soils in the project area would occur.

### *Cumulative Impacts*

No additional projects are planned within the Holcomb Bridge Unit that would affect soils in the area; therefore, no cumulative impacts are expected.

### *Conclusion*

Alternative 1 would result in no long-term, adverse impacts on soils because no actions would be taken. No cumulative impacts are expected.

## **Alternative 2: Construction of the Crooked Creek Hiking Trail (Preferred Alternative)**

### *Analysis*

Temporary impacts on soils could result from disturbance during construction. However, the Crooked Creek Hiking Trail has been designed to follow the existing informal foot path and only deviate from the existing path where necessary to minimize impacts to resources. Additionally, there would be minimal grading and all materials used would be natural surface components allowing the natural state of the project area to persist. Temporary construction impacts would be avoided and minimized by complying with applicable regulations required under local, state, and federal law, and the implementation of required sediment and erosion control plans, stormwater pollution prevention plans, and other permitting requirements and best management practices. A Land Disturbance Permit (LDP) would be requested from the City of Sandy Springs that ensures applicants comply with the Georgia Stormwater Manual approved by the State in 2016. This LDP requires, at a minimum, a pre-construction inspection and a post-construction inspection. All permitting required for the construction of the Crooked Creek Hiking Trail would be managed by the City of Sandy Springs.

### *Cumulative Impacts*

No additional projects are planned within the Holcomb Bridge Unit that would affect soils in the area; therefore, no cumulative impacts are expected.

### *Conclusion*

Alternative 2 would have no short or long-term significant adverse impacts to soils within the project area. The Crooked Creek Hiking Trail would follow the existing, informal, foot path to not create additional, unnecessary soil disturbance and all applicable permitting requirements and erosion control measures would be used during construction. Continued use may compact soils to a greater extent. However, no significant adverse impacts are expected.

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## **VISITOR USE AND EXPERIENCE**

### **Methodology and Assumptions**

The purpose of this impact analysis is to assess the effects of the alternatives on visitor use and experience within the Holcomb Bridge Unit. To determine impacts, the current uses at the park were considered and the potential effects of the construction of the Crooked Creek Hiking Trail on visitor use and experience were analyzed.

### **Study Area**

The study area for visitor use includes the entire project area.

### **Alternative 1: No Action**

#### *Analysis*

Under the No Action Alternative, the public would not have a safe, maintained, and official access trail from the proposed Crooked Creek Park to the Holcomb Bridge Unit. The Holcomb Bridge Unit would continue to be inaccessible by the public.

#### *Cumulative Impacts*

No additional projects are planned within the Holcomb Bridge Unit that would affect visitor use and experience in the area; therefore, no cumulative impacts are expected.

#### *Conclusion*

The No Action Alternative would result in no safe, maintained, and official access trail from the proposed Crooked Creek Park to the Holcomb Bridge Unit. Alternative 1 would result in significant adverse impacts on visitor use and experience as the Holcomb Bridge Unit would not be utilized for public enjoyment. No cumulative impacts are expected.

### **Alternative 2: Construction of the Crooked Creek Hiking Trail (Preferred Alternative)**

#### *Analysis*

Under Alternative 2, the existing, informal walking path would be expanded into an official 3-foot-wide natural surface walking trail for public use. The Crooked Creek Hiking Trail would create an official access trail from the proposed Crooked Creek Park through the Holcomb Bridge Unit.

#### *Cumulative Impacts*

No additional projects are planned within the Holcomb Bridge Unit that would affect visitor use and experience in the area; therefore, no cumulative impacts are expected.

#### *Conclusion*

Construction of the Crooked Creek Hiking Trail would facilitate safe, maintained, and controlled public access to the Holcomb Bridge Unit providing a significant long-term beneficial impact to the Holcomb

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Bridge Unit. The proposed Crooked Creek Hiking Trail works in line with the National Park Service's mission to "preserve natural resources for the enjoyment, education, and inspiration of this and future generations."

## **WILDLIFE AND WILDLIFE HABITAT**

### **Methodology and Assumptions**

Impacts on wildlife and wildlife habitat could be direct or indirect. Direct impacts are those that physically disturb wildlife as a result of the implementation of an activity, while indirect impacts are those that may occur inadvertently during or after an activity. Direct and indirect impacts can be either adverse, beneficial, or negligible. Adverse impacts are those that alter or remove wildlife and wildlife habitat. Beneficial impacts are those that promote the survival of wildlife and preservation of wildlife habitat.

### **Study Area**

The study area for wildlife and wildlife habitat encompasses the entire project area.

### **Alternative 1: No Action**

#### *Analysis*

Under the No Action Alternative, no wildlife or wildlife habitat would be altered on the project site through construction. However, the unofficial use of this greenspace by the public has the potential to cause both direct and indirect impacts. Disturbance caused through foot traffic can damage wildlife habitat in the area, as well as result in wildlife displacement through human activity and the public physically impacting wildlife (e.g. moving box turtles).

#### *Cumulative Impacts*

No additional projects are planned within the Holcomb Bridge Unit that would affect wildlife and wildlife habitat in the area; therefore, no cumulative impacts are expected.

#### *Conclusion*

There would be no impacts to wildlife and wildlife habitat within the project area through construction under the No Action Alternative. However, there is the potential for both direct and indirect adverse impacts through the unofficial public use of the Holcomb Bridge Unit. No cumulative impacts on wildlife and wildlife habitat are expected.

### **Alternative 2: Construction of the Crooked Creek Trail (Preferred Alternative)**

#### *Analysis*

Under Alternative 2, minimal vegetation trimming would occur along the 10-foot-wide clear zone to be inclusive of the 3-foot natural surface hiking trail. Existing wildlife habitat would remain unaltered to the extent practicable while still maintaining a safe, accessible trail. Construction of the Crooked Creek Hiking Trail would encourage the public to use a designated area for walking which would lessen both direct and indirect impacts to wildlife and wildlife habitat in surrounding areas.

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### *Cumulative Impacts*

No additional projects are planned within the Holcomb Bridge Unit that would affect wildlife and wildlife habitat in the area; therefore, no cumulative impacts are expected.

### *Conclusion*

Construction of the Crooked Creek Hiking Trail would have no significant adverse impacts on wildlife and wildlife habitat in the project area. The Crooked Creek Hiking Trail may provide a beneficial impact to wildlife and wildlife habitat by encouraging the public to use a designated hiking trail rather than disturbing a larger area within the Holcomb Bridge Unit. No cumulative impacts on wildlife and wildlife habitat are expected.

## **SPECIAL-STATUS SPECIES**

### **Methodology and Assumptions**

Impacts on special-status species of flora and fauna could be direct or indirect. Direct impacts are those that physically disturb listed species as a result of the implementation of an activity, while indirect impacts are those that may occur inadvertently during or after an activity. Direct and indirect impacts can be either adverse, beneficial, or negligible. Adverse impacts are those that alter or remove listed species and their designated critical habitat. Beneficial impacts are those that promote the survival of listed species and protection of their designated critical habitat.

### **Study Area**

The study area for special-status species encompasses the 30-foot-wide survey corridor to be inclusive of the proposed Crooked Creek Hiking Trail.

### **Alternative 1: No Action**

#### *Analysis*

Under the No Action Alternative, existing site conditions would remain; therefore, no special-status species or their habitats would be affected within the Holcomb Bridge Unit through construction.

#### *Cumulative Impacts*

No additional projects are planned within the Holcomb Bridge Unit that would affect special-status species or critical habitat in the area; therefore, no cumulative impacts are expected.

#### *Conclusion*

There would be no impacts to special-status species or critical habitat within the project area through construction under the No Action Alternative. No cumulative impacts to special-status species or their critical habitats are expected.

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## **Alternative 2: Construction of the Crooked Creek Trail (Preferred Alternative)**

### *Analysis*

Under Alternative 2, no significant adverse impacts to special-status species, their suitable habitat, or designated critical habitat would occur (see Table 2).

Suitable habitat exists for the state protected bay starvine, but individuals were not identified during a species-specific pedestrian survey. Construction of the proposed trail would result in minor, less than significant adverse effect to suitable habitat for bay starvine; however, this disturbance would be limited to vegetation trimming along the 10-foot-wide clear zone to be inclusive of the proposed 3-foot-wide natural surface trail. Existing vegetation would remain intact as much as practicable while still maintaining a safe, accessible trail. Therefore, the project would have “no significant adverse effect” to bay starvine (see Table 2).

The survey corridor does not provide suitable habitat for the remaining federal or state protected species considered in this EA; therefore, the proposed project would have “no effect” on the federally protected species under consideration and “no adverse effect” on the remaining state protected species under consideration (see Table 2).

Per review of IPaC databases, there is no designated critical habitat for federally threatened and endangered species within, or adjacent to, the project area. Because no critical habitat is present, there would be no adverse modification of designated critical habitat as a result of the construction of the Crooked Creek Hiking Trail.

### *Cumulative Impacts*

No additional projects are planned within the Holcomb Bridge Unit that would affect wildlife and wildlife habitat in the area; therefore, no cumulative impacts are expected.

### *Conclusion*

Construction of the Crooked Creek Hiking Trail would have no significant adverse impacts on special-status species as there are no listed species within the project area. There is no designated critical habitat within the project area; therefore, no adverse modifications would occur to critical habitat. No cumulative impacts on special-status species or critical habitat are expected.

## **SOUNDSCAPES**

### **Methodology and Assumptions**

Impacts on soundscapes could be direct or indirect. Direct impacts are those that disturb sound levels in the area as a result of the construction of the Crooked Creek Hiking Trail, while indirect impacts are those that may occur inadvertently as a result of the trail. Direct and indirect impacts can be either adverse, beneficial, or negligible. Adverse impacts are those that increase perceived sound levels in the nearby residential areas or that would not comply with NPS soundscape preservation and noise management requirements.

### **Study Area**

The study area for soundscapes encompasses the entire project area.

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## **Alternative 1: No Action**

### *Analysis*

Under the No Action Alternative, current sound levels of the Holcomb Bridge Unit would remain the same.

### *Cumulative Impacts*

No additional projects are planned within the Holcomb Bridge Unit that would affect soundscapes in the area; therefore, no cumulative impacts are expected.

### *Conclusion*

There would be no impacts on soundscapes within the project area under the No Action Alternative. No cumulative impacts on soundscapes are expected.

## **Alternative 2: Construction of the Crooked Creek Trail (Preferred Alternative)**

### *Analysis*

Under Alternative 2, noise levels associated with recreational use of the Holcomb Bridge Unit would be expected to remain similar in nature and scale to the current noise levels in the project area. Any additional noise created through the pedestrian use of the Crooked Creek Hiking Trail would serve the NPS mission to preserve natural resources for the enjoyment, education, and inspiration of this and future generations and would be considered appropriate and compliant with NPS soundscape preservation and noise management requirements. Noise associated with Alternative 2 would not cause significant adverse effects to the existing soundscape. It is anticipated that noise from adjacent roadways and developments would continue to be the dominant source of noise within the Holcomb Bridge Unit.

### *Cumulative Impacts*

No additional projects are planned within the Holcomb Bridge Unit that would affect soundscapes in the area; therefore, no cumulative impacts are expected.

### *Conclusion*

Construction of the Crooked Creek Hiking Trail would have no long-term significant adverse impacts on the soundscapes within the Holcomb Bridge Unit and surrounding areas. Alternative 2 would comply with requirements outlined in NPS Director's Order #47 designed to protect, maintain, and restore natural soundscapes in a condition unimpaired by inappropriate or excessive noise sources. No cumulative impacts on soundscapes are expected.

## **CULTURAL RESOURCES**

### **Methodology and Assumptions**

Impacts on cultural resources could be direct or indirect. Direct impacts are those that physically alter or disturb cultural resources as a result of the implementation of an activity, while indirect impacts are those that may occur inadvertently during or after an activity. Direct and indirect impacts can be either adverse, beneficial, or negligible. Adverse impacts are those that alter or remove cultural resources. Beneficial impacts are those that promote the preservation of cultural resources.

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## **Study Area**

The study area for cultural resources encompasses the 30-foot-wide survey corridor to be inclusive of the proposed Crooked Creek Hiking Trail.

### **Alternative 1: No Action**

#### *Analysis*

Under the No Action Alternative, no cultural resources would be altered on the project site.

#### *Cumulative Impacts*

No additional projects are planned within the Holcomb Bridge Unit that would affect cultural resources in the area; therefore, no cumulative impacts are expected.

#### *Conclusion*

There would be no significant adverse impacts on cultural resources within the project area under the No Action Alternative. No cumulative impacts on cultural resources are expected.

### **Alternative 2: Construction of the Crooked Creek Trail (Preferred Alternative)**

#### *Analysis*

NPS conducted coordination with the SHPO regarding cultural resource concerns (see Appendix 1). SHPO concurred with NPS findings of “no adverse effect” to historic properties with the condition that a vegetative buffer is maintained or installed along the boundary of 6020 Spaulding Drive (see Appendix 1 for NPS Concurrence Request Letter dated 27 February 2019 and SHPO correspondence letter dated 26 March 2019). Due to the lack of a Phase I cultural resources survey, the presence or absence of subsurface archaeological resources cannot be confirmed. Based on the nature of the proposed project, the CRNRA Superintendent has determined that, in lieu of a Phase I cultural resources survey, an archaeological monitor would be present during portions of construction involving soil disturbance (NPS Email Correspondence, 17 June 2019). In the event that archaeological materials are discovered during construction, then all ground disturbing activities in the vicinity would cease and SHPO would be contacted. SHPO acknowledged this approach in the correspondence letter dated 26 March 2019 (see Appendix 1).

#### *Cumulative Impacts*

No additional projects are planned within the Holcomb Bridge Unit that would affect cultural resources in the area; therefore, no cumulative impacts are expected.

#### *Conclusion*

Construction of the Crooked Creek Hiking Trail would have no significant adverse impacts on cultural resources within the project area. There are no documented NRHP-eligible cultural resources occurring on, or adjacent to, the Holcomb Bridge Unit. SHPO concurred with a “no adverse effect” finding for historic properties. In lieu of a Phase I cultural resources survey, an archaeological monitor would be present during portions of construction involving soil disturbance (NPS Email Correspondence, 17 June 2019). In the event that archaeological materials are discovered during construction, then all ground disturbing activities in the vicinity would cease and SHPO would be contacted.



## **LIST OF PREPARERS**

### **Pond and Company**

Glenn Martin, Environmental Lead

Flynt Barksdale, Senior Scientist

Kaili Stevens, Environmental Scientist

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## CHAPTER 5: ACRONYMS AND ABBREVIATIONS

<b>ADA</b>	Americans with Disabilities Act
<b>BMP</b>	Best management practice
<b>CEQ</b>	Council on Environmental Quality
<b>CRNRA</b>	Chattahoochee River National Recreation Area
<b>CFR</b>	Code of Federal Regulations
<b>EA</b>	Environmental Assessment
<b>FEMA</b>	Federal Emergency Management Agency
<b>FGDC</b>	Federal Geographic Data Committee
<b>GADNR</b>	Georgia Department of Natural Resources
<b>GAEPD</b>	Georgia Environmental Protection Division
<b>IPaC</b>	Information for Planning and Consultation
<b>LF</b>	linear feet
<b>NEPA</b>	National Environmental Policy Act of 1969, as amended
<b>NPS</b>	National Park Service
<b>NRCS</b>	Natural Resources Conservation Service
<b>NRHP</b>	National Register of Historic Places
<b>OSHA</b>	Occupational Safety and Health Administration
<b>SHPO</b>	State Historic Preservation Office
<b>USC</b>	United States Code
<b>USDA</b>	United States Department of Agriculture
<b>USFWS</b>	United States Fish and Wildlife Service

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## CHAPTER 6: REFERENCES

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## **APPENDICES**

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## **APPENDIX 1**



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13 November 2018

Anna Yellin  
Georgia Department of Natural Resources  
Wildlife Resources Conservation Center  
2065 US Hwy 278 SE  
Social Circle, Georgia 30334  
770.918.6411

**SUBJECT: Intergovernmental and Interagency Coordination of Environmental Planning (IICEP) in support of an Environmental Assessment of the National Park Service's (NPS) Proposed Crooked Creek Park in the City of Sandy Springs, Georgia.**

Dear Ms. Yellin,

The National Park Service (NPS) and the City of Sandy Springs, Georgia are preparing environmental documentation for preparation of the Environmental Assessment (EA) for the proposed Crooked Creek Hiking Trail.

The purpose of the project is to provide a designated hiking trail that connects the Holcomb Bridge Unit to the proposed Crooked Creek Park. The project is needed in order to provide safe, maintained, and controlled public access to the Holcomb Bridge Unit and the proposed Crooked Creek Park. Currently, there is no official access to the Holcomb Bridge Unit. The city has obtained access from an adjacent parcel to establish an approximately 1-mile natural surface walking trail to connect the proposed Crooked Creek Park and the Holcomb Bridge Unit. The natural surface trail within the Holcomb Bridge Unit consists of an approximately 3,060 linear feet (LF) loop trail in addition to the proposed 1-mile Crooked Creek Hiking Trail.

Please provide information regarding any known occurrences of protected species, critical habitat, or sensitive areas within three miles of the proposed project area and information regarding the nearest known bald eagle nesting location.

Enclosed are project maps, the IPaC lists from the U.S. Fish and Wildlife Service website, and the "Known Occurrences of Special Concern Plants, Animals, and Natural Communities" in Fulton County, Georgia from the Georgia Department of Natural Resources website. Please confirm for us that these lists are still current. Your comments regarding the potential for the proposed project to adversely impact protected species would be greatly appreciated.

Data that you make available will provide valuable and necessary input into the NEPA analytical process. As part of the NEPA process, local citizens, groups, and agencies, among others, will have ample future opportunity to review and comment on the information and alternatives addressed in the document.

We look forward to and welcome your participation in this analysis. **Please respond on or before December 6, 2018** to enable us to complete this phase of the project within the scheduled timeframe.

**Please send your written responses via regular mail or e-mail (preferred) to:**

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Peachtree Corners, GA 30092  
[stevensk@pondco.com](mailto:stevensk@pondco.com)

If you have any questions about this project, please contact Mr. Barksdale at (770) 653-0938, or via e-mail at [barksdalef@pondco.com](mailto:barksdalef@pondco.com).

Sincerely,

A handwritten signature in black ink, appearing to read "W. Flynt Barksdale".

Flynt Barksdale, PWS  
Senior Scientist  
Pond and Company

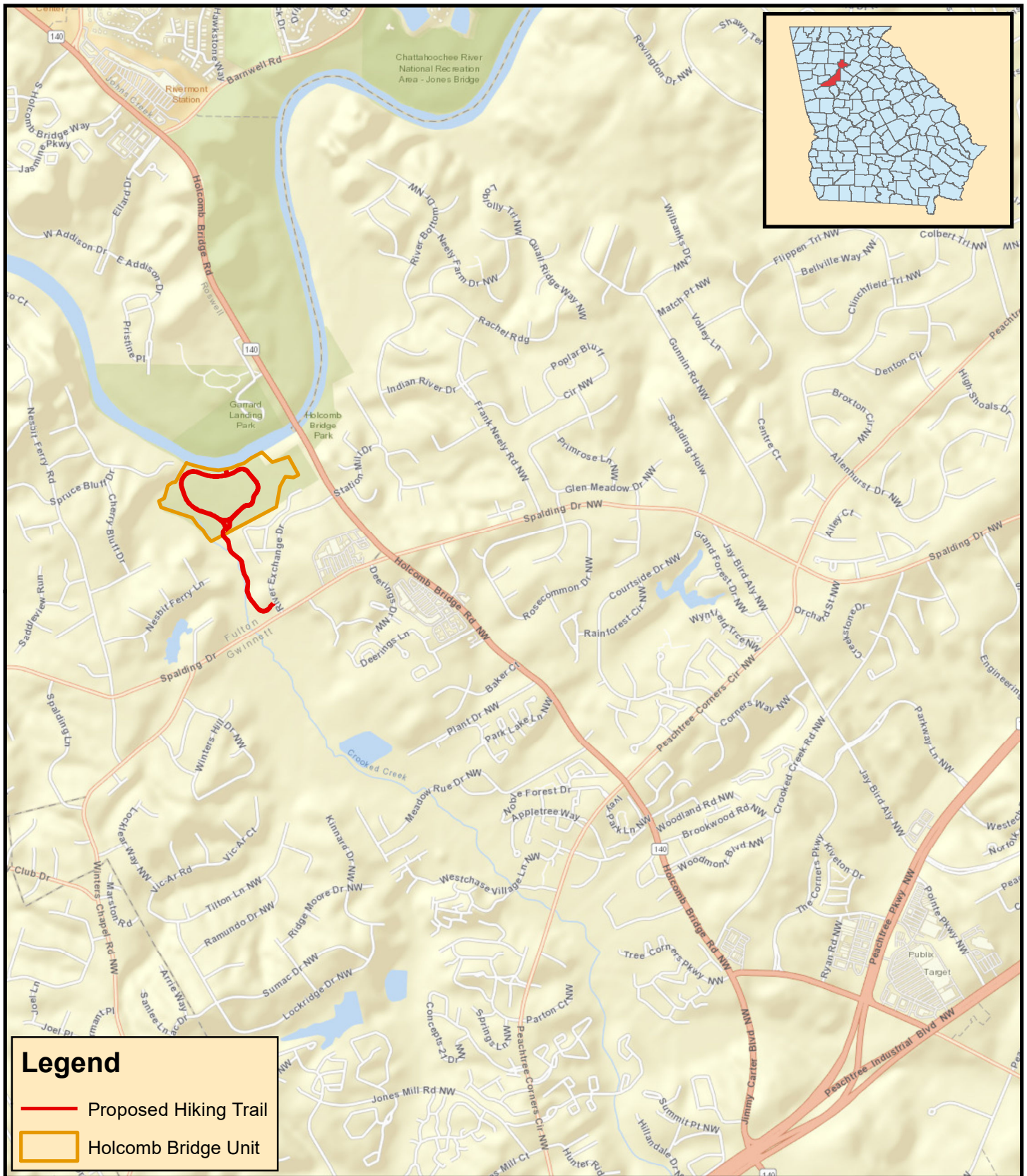
**Attachment 1:** Figures

**Attachment 2:** IPaC List

**Attachment 3:** Online known occurrences from GADNR biodiversity tool



## Attachment 1



Service Layer Credits: Sources: Esri, HERE, DeLorme, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), MapmyIndia, NGCC, © OpenStreetMap

Figure 1  
Project Vicinity Map

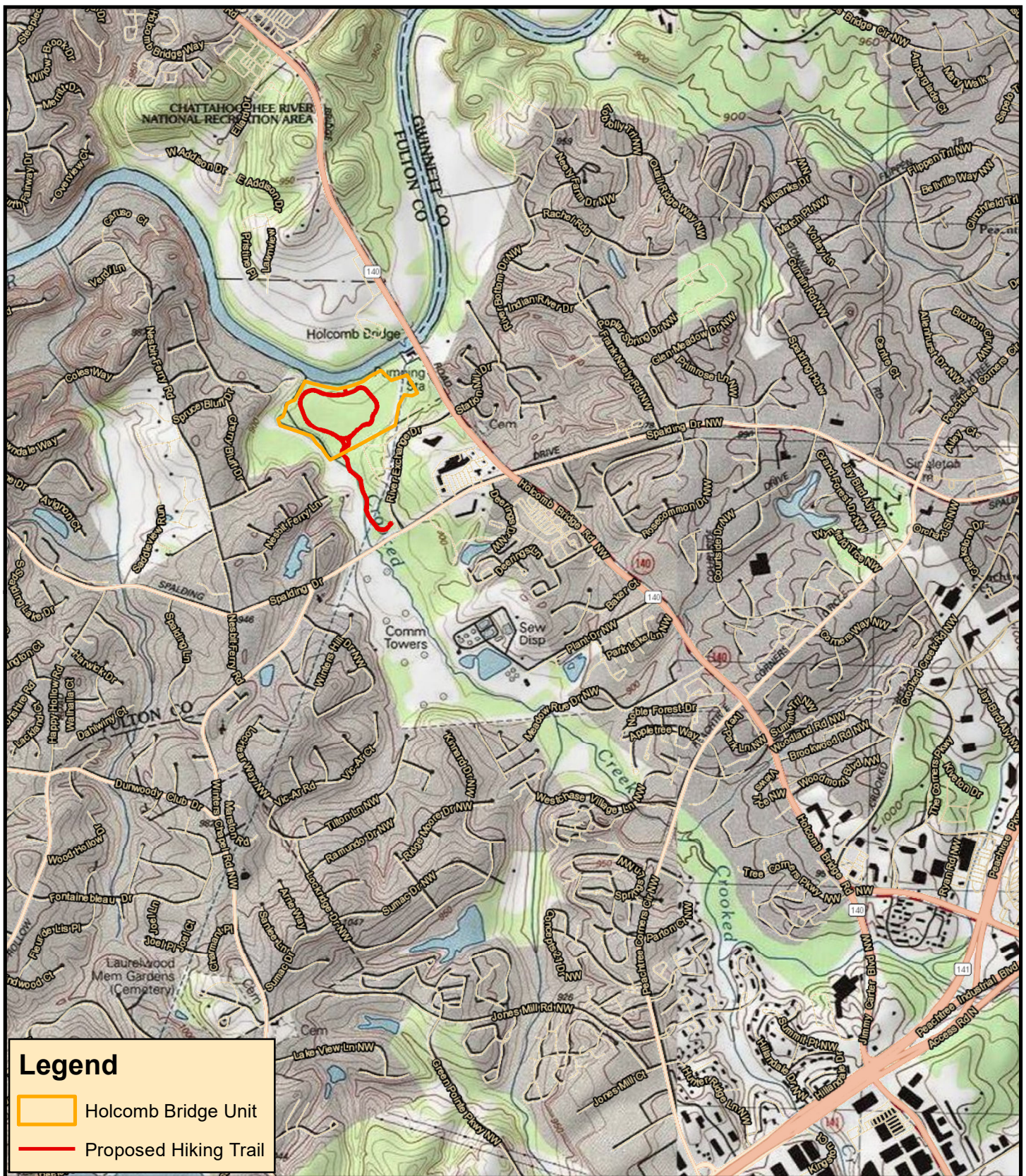




Service Layer Credits: Esri, HERE, DeLorme, MapmyIndia, © OpenStreetMap contributors  
Esri, HERE, DeLorme, MapmyIndia, © OpenStreetMap contributors, and the GIS user community

Figure 2  
**Aerial Map**





Service Layer Credits: Copyright:© 2013 National Geographic Society, i-cubed  
Esri, HERE, DeLorme, MapmyIndia, © OpenStreetMap contributors

Figure 3  
Topographic Map



## Attachment 2



## United States Department of the Interior

FISH AND WILDLIFE SERVICE  
Georgia Ecological Services Field Office  
105 Westpark Drive  
Westpark Center Suite D  
Athens, GA 30606-3175  
Phone: (706) 613-9493 Fax: (706) 613-6059



In Reply Refer To:

May 11, 2018

Consultation Code: 04EG1000-2018-SLI-1836

Event Code: 04EG1000-2018-E-02851

Project Name: Holcomb Bridge

Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

To Whom It May Concern:

This list identifies threatened, endangered, proposed and candidate species, as well as critical habitat, that may be affected by your proposed project. This list may change before your project is completed. Under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this list should be verified after 90 days. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation.

Bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 *et seq.*). Projects affecting these species may require development of an eagle conservation plan ([http://www.fws.gov/windenergy/eagle\\_guidance.html](http://www.fws.gov/windenergy/eagle_guidance.html)).

Wind energy projects should follow the wind energy guidelines <http://www.fws.gov/windenergy/> for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts of communication towers on migratory birds can be found under the "Bird Hazards" tab at: [www.fws.gov/migratorybirds](http://www.fws.gov/migratorybirds).

Attachment(s):

- Official Species List

## Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

**Georgia Ecological Services Field Office**

105 Westpark Drive

Westpark Center Suite D

Athens, GA 30606-3175

(706) 613-9493

---



## Project Summary

Consultation Code: 04EG1000-2018-SLI-1836

Event Code: 04EG1000-2018-E-02851

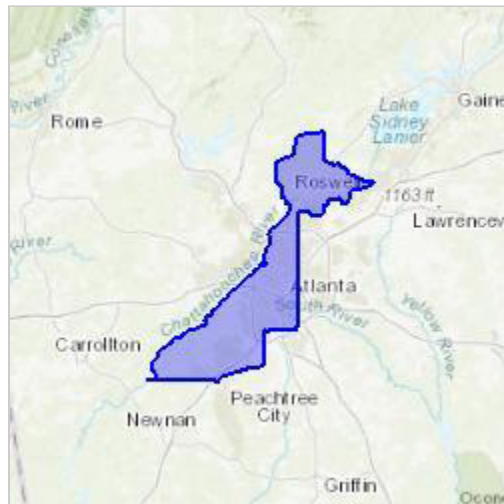
Project Name: Holcomb Bridge

Project Type: TRANSPORTATION

Project Description: Trail

Project Location:

Approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/place/33.84438254686883N84.40371362904563W>



Counties: Fulton, GA

---

## Endangered Species Act Species

There is a total of 6 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries<sup>1</sup>, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

- 
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

### Fishes

NAME	STATUS
Cherokee Darter <i>Etheostoma scotti</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/2553">https://ecos.fws.gov/ecp/species/2553</a>	Threatened

### Clams

NAME	STATUS
Gulf Moccasinshell <i>Medionidus penicillatus</i> There is <b>final</b> critical habitat for this species. Your location is outside the critical habitat. Species profile: <a href="https://ecos.fws.gov/ecp/species/7663">https://ecos.fws.gov/ecp/species/7663</a>	Endangered
Oval Pigtoe <i>Pleurobema pyriforme</i> There is <b>final</b> critical habitat for this species. Your location is outside the critical habitat. Species profile: <a href="https://ecos.fws.gov/ecp/species/4132">https://ecos.fws.gov/ecp/species/4132</a>	Endangered
Purple Bankclimber (mussel) <i>Elliptioideus sloatianus</i> There is <b>final</b> critical habitat for this species. Your location is outside the critical habitat. Species profile: <a href="https://ecos.fws.gov/ecp/species/7660">https://ecos.fws.gov/ecp/species/7660</a>	Threatened
Shinyrayed Pocketbook <i>Lampsilis subangulata</i> There is <b>final</b> critical habitat for this species. Your location is outside the critical habitat. Species profile: <a href="https://ecos.fws.gov/ecp/species/6517">https://ecos.fws.gov/ecp/species/6517</a>	Endangered

---

## Flowering Plants

NAME	STATUS
Michaux's Sumac <i>Rhus michauxii</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/5217">https://ecos.fws.gov/ecp/species/5217</a>	Endangered

## Critical habitats

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

### **Attachment 3**

**GEORGIA**  
DEPARTMENT OF NATURAL RESOURCES  
WILDLIFE RESOURCES DIVISION

**GEORGIA**  
BIODIVERSITY PORTAL

## Rare natural elements within 1 miles of -84.266, 33.971 (WGS84) in Fulton County, GA, using generalized quarter quad locations

Customize

3 element records in list

### ANIMALS

*Cambarus howardi* (Chattahoochee Crayfish, ) Rank: G3Q/S2, Ga: Threatened, US: No US federal protection, SWAP: Yes, EOs: 40, Habitat: riffle areas of streams; in rocks with swift-flowing water [PROFILE](#) [RANGE MAP](#) [EXPLORER](#)

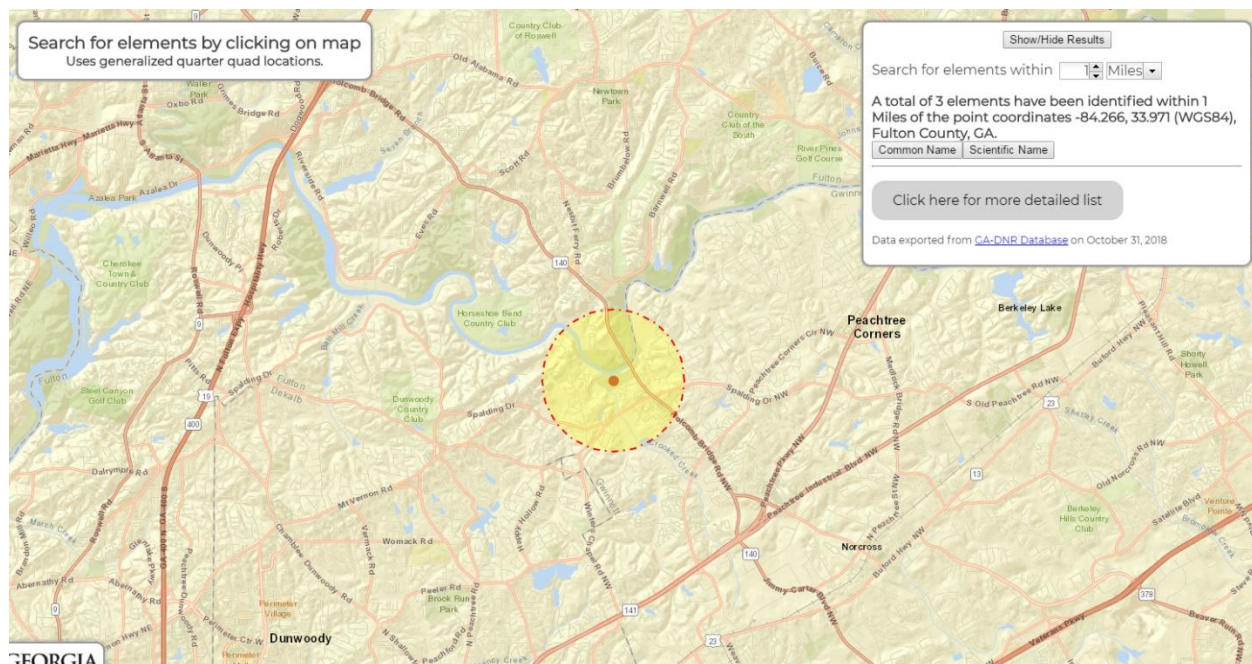
### PLANTS

*Schisandra glabra* (Bay Star-vine, ) Rank: G3/S2, Ga: Threatened, US: No US federal protection, SWAP: Yes, EOs: 71, Habitat: Rich woods on stream terraces and lower slopes [PROFILE](#) [RANGE MAP](#) [EXPLORER](#)

*Symphotrichum georgianum* (Georgia Aster, ) Rank: G3/S3, Ga: Threatened, US: No US federal protection, SWAP: Yes, EOs: 130, Habitat: Upland oak-hickory-pine forests and openings; sometimes with Echinacea laevigata or over amphibolite [PROFILE](#) [RANGE MAP](#) [EXPLORER](#)

Element records are selected from generalized quarter quad EO data that was exported from [GA-DNR Database](#) on October 31, 2018

[Download CSV](#)
[What is rare natural element data?](#)







MARK WILLIAMS  
COMMISSIONER

RUSTY GARRISON  
DIRECTOR

November 27, 2018

Kaili Stevens  
Scientist  
Pond  
3500 Parkway Lane  
Suite 500  
Peachtree Corners, GA 30092

**Subject: Known occurrences of natural communities, plants and animals of highest priority conservation status on or near NPS Crooked Creek Hiking Trail Project, Fulton County, Georgia**

Dear Ms. Stevens:

This is in response to your request of November 13, 2018. According to our records, within a three-mile radius of the project site, there are the following Natural Heritage Database occurrences:

**(Site Center: -84.267983, 33.970409, WGS84)**

- GA *Cambarus howardi* (Chattahoochee Crayfish) approx. 1.9 mi N of site in unnamed perennial streams
- GA *Cypripedium acaule* (Pink Ladyslipper) approx. 1.6 mi NE of site
- GA *Micropterus cataractae* (Shoal Bass) approx. 2.3 mi NE of site in the Chattahoochee River
- GA *Schisandra glabra* (Bay Star-vine) approx. 0.6 mi NW of site
- GA *Schisandra glabra* (Bay Star-vine) approx. 2.3 mi NW of site
- GA *Schisandra glabra* (Bay Star-vine) approx. 0.3 mi NE of site
- GA *Schisandra glabra* (Bay Star-vine) approx. 2.2 mi NE of site
- GA *Schisandra glabra* (Bay Star-vine) approx. 1.3 mi NE of site
- GA *Symphytotrichum georgianum* (Georgia Aster) approx. 2.3 mi N of site
- GA *Symphytotrichum georgianum* (Georgia Aster) [EXTIRPATED?] approx. 1.4 mi N of site
- Chattahoochee River National Recreation Area [National Park Service] on site**
- Georgia Land Trust [Georgia Land Trust] approx. 0.1 mi W of site
- Georgia Land Trust [Georgia Land Trust] on site**
- Peachtree [Corps of Engineers] approx. 2.0 mi SE of site
- Greenspace program acquisition approx. 0.1 mi N of site

**Recommendations:**

Please be aware that state protected species have been documented within three miles of the proposed project. For information about these species, including survey recommendations,

please visit our webpage at <http://georgiawildlife.com/conservation/species-of-concern#rare-locations>. Surveys for species of conservation concern should be conducted prior to commencement of construction.

If the applicant is willing to assume presence and implement provisions to protect *state listed aquatic species* identified during this review, it may not be necessary to complete any additional surveys for aquatic species. Please refer to the Aquatic Survey Determination Protocol For State Listed Species in determining whether surveys are recommended. Although this document was prepared for use on GDOT projects, it may be applicable to other projects, as well. For any additional questions about aquatics, please contact Paula Marcinek at [Paula.Marcinek@dnr.ga.gov](mailto:Paula.Marcinek@dnr.ga.gov) about state-listed fishes or Jason Wisniewski at [Jason.Wisniewski@dnr.ga.gov](mailto:Jason.Wisniewski@dnr.ga.gov) about state-listed mussels, snails, crayfishes, or aquatic insects.

A “Candidate Conservation Agreement” was recently signed for Georgia Aster. This voluntary commitment to protect the species and its necessary habitat can be referenced at: [https://www.fws.gov/asheville/pdfs/GA-Aster\\_CandidateConservationAgreement.pdf](https://www.fws.gov/asheville/pdfs/GA-Aster_CandidateConservationAgreement.pdf).

We are glad to see trail construction, which will add to the recreation opportunities in the community. Please keep erosion to a minimum during construction and leave as much vegetation intact as possible. In wet areas, use boardwalks if possible to prevent degradation and destruction of these sensitive habitats. If the path is paved, we strongly recommend using a porous pavement that will allow water to soak through instead of running off the surface and into the watershed. Please plan the trail carefully and provide for adequate parking and access areas. These measures will help protect water quality, protect sensitive habitats and native species, and provide for a more enjoyable recreational experience for the users.

Please be aware that the type of erosion control material used during construction can impact wildlife. We strongly recommend using natural, biodegradable materials such as ‘jute’ or ‘coir’. Mesh strands should be movable, as opposed to fixed. Use of plastic fencing frequently leads to wildlife entrapment and death.

#### **Disclaimer:**

Please keep in mind the limitations of our database. The data collected by the Nongame Conservation Section comes from a variety of sources, including museum and herbarium records, literature, and reports from individuals and organizations, as well as field surveys by our staff biologists. In most cases the information is not the result of a recent on-site survey by our staff. Many areas of Georgia have never been surveyed thoroughly. Therefore, the Nongame Conservation Section can only occasionally provide definitive information on the presence or absence of rare species on a given site. Our files are updated constantly as new information is received. **Thus, information provided by our program represents the existing data in our files at the time of the request and should not be considered a final statement on the species or area under consideration.**

If you know of populations of highest priority species that are not in our database, please fill out the appropriate data collection form and send it to our office. Forms can be obtained through our web site (<http://georgiawildlife.com/conservation/species-of-concern#rare-locations>) or by contacting our office. If I can be of further assistance, please let me know.

Sincerely,

A handwritten signature in cursive script that reads "Laci Pattavina".

Laci Pattavina  
Environmental Review Biologist

#### **Data Available on the Wildlife Conservation Section Website**

- Georgia protected plant and animal profiles are available on our website. These accounts cover basics like descriptions and life history, as well as threats, management recommendations and conservation status. Visit <http://georgiawildlife.com/conservation/species-of-concern#rare-locations>.
- Rare species and natural community information can be viewed by Quarter Quad, County and HUC8 Watershed. To access this information, please visit our GA Rare Species and Natural Community Information page at: <http://georgiabiodiversity.org/>.
- Downloadable files of rare species and natural community data by quarter quad and county are also available. They can be downloaded from: <http://georgiabiodiversity.org/natels/natural-element-locations.html>





3500 Parkway Lane, Suite 500  
Peachtree Corners, Georgia 30092

T: 678.336.7740 | F: 678.336.7744  
www.pondco.com

6 November 2018

Michael Berry  
2 Martin Luther King, Jr. Drive  
Suite 1456, East Tower  
Atlanta, Georgia 30334  
404.651.8554

**SUBJECT: Intergovernmental and Interagency Coordination of Environmental Planning (IICEP) in support of an Environmental Assessment of the National Park Service's (NPS) Proposed Crooked Creek Park in the City of Sandy Springs, Georgia.**

Dear Mr. Berry,

The National Park Service (NPS) and the City of Sandy Springs, Georgia are preparing environmental documentation for preparation of the Environmental Assessment (EA) for the proposed Crooked Creek Hiking Trail.

The purpose of the project is to provide a designated hiking trail that connects the Holcomb Bridge Unit to the proposed Crooked Creek Park. The project is needed in order to provide safe, maintained, and controlled public access to the Holcomb Bridge Unit and the proposed Crooked Creek Park. Currently, there is no official access to the Holcomb Bridge Unit. The city has obtained access from an adjacent parcel to establish an approximately 1-mile natural surface walking trail to connect the proposed Crooked Creek Park and the Holcomb Bridge Unit. The natural surface trail within the Holcomb Bridge Unit consists of an approximately 3,060 linear feet (LF) loop trail in addition to the proposed 1-mile Crooked Creek Hiking Trail.

As this Proposed Action is federally funded, we are preparing an Environmental Assessment (EA) that will evaluate the environmental, cultural, and socioeconomic impacts associated with the Proposed Action, pursuant to the National Environmental Policy Act (NEPA) of 1969, as amended (42 U.S. Code (USC)§4321 et seq.); the Council on Environmental Quality (CEQ) Regulations (40 Code of Federal Regulations [CFR] Parts 1500-1508); and 32 CFR Part 651 (Environmental Analysis of Army Actions; Final Rule, 29 March 2002).

**Information Request:** While the NPS maintains a wealth of current environmental, cultural, and socioeconomic data concerning the Holcomb Bridge Unit, we are seeking your input into this process concerning any specific environmental issues or concerns your agency may have. Information your agency can provide on any of the following environmental issue areas (at or in the vicinity of the Proposed Action sites) would be appreciated:

- Potential environmental concerns or issues;
- Surface and groundwater resources, including streams, wetlands, floodplains, open water features, wells, and local aquifers;
- Federally or state listed threatened or endangered species, or any species proposed for such listing, or critical habitat for such species that may occur within a one-mile radius around the proposed sites;
- Parks, nature preserves, conservation areas, designated wild or scenic rivers, migratory bird habitats, or special wildlife issues;

Architects  
Engineers  
Planners  
Constructors

- Natural resource issues;
- Pertinent soils and geologic data
- Traffic, noise, or socioeconomic concerns;
- Air quality concerns; and/or
- Additional environmental, cultural, land use, or socioeconomic information or concerns your agency may have with regard to the referenced site.

Data that you make available will provide valuable and necessary input into the NEPA analytical process. As part of the NEPA process, local citizens, groups, and agencies, among others, will have ample future opportunity to review and comment on the information and alternatives addressed in the document.

We look forward to and welcome your participation in this analysis. **Please respond on or before December 6, 2018** to enable us to complete this phase of the project within the scheduled timeframe.

**Please send your written responses via regular mail or e-mail (preferred) to:**

Flynt Barksdale  
Senior Scientist  
Pond and Company  
3500 Parkway Lane  
Peachtree Corners, GA 30092  
[barksdalef@pondco.com](mailto:barksdalef@pondco.com)

Kaili Stevens  
Environmental Scientist  
Pond and Company  
3500 Parkway Lane  
Peachtree Corners, GA 30092  
[stevensk@pondco.com](mailto:stevensk@pondco.com)

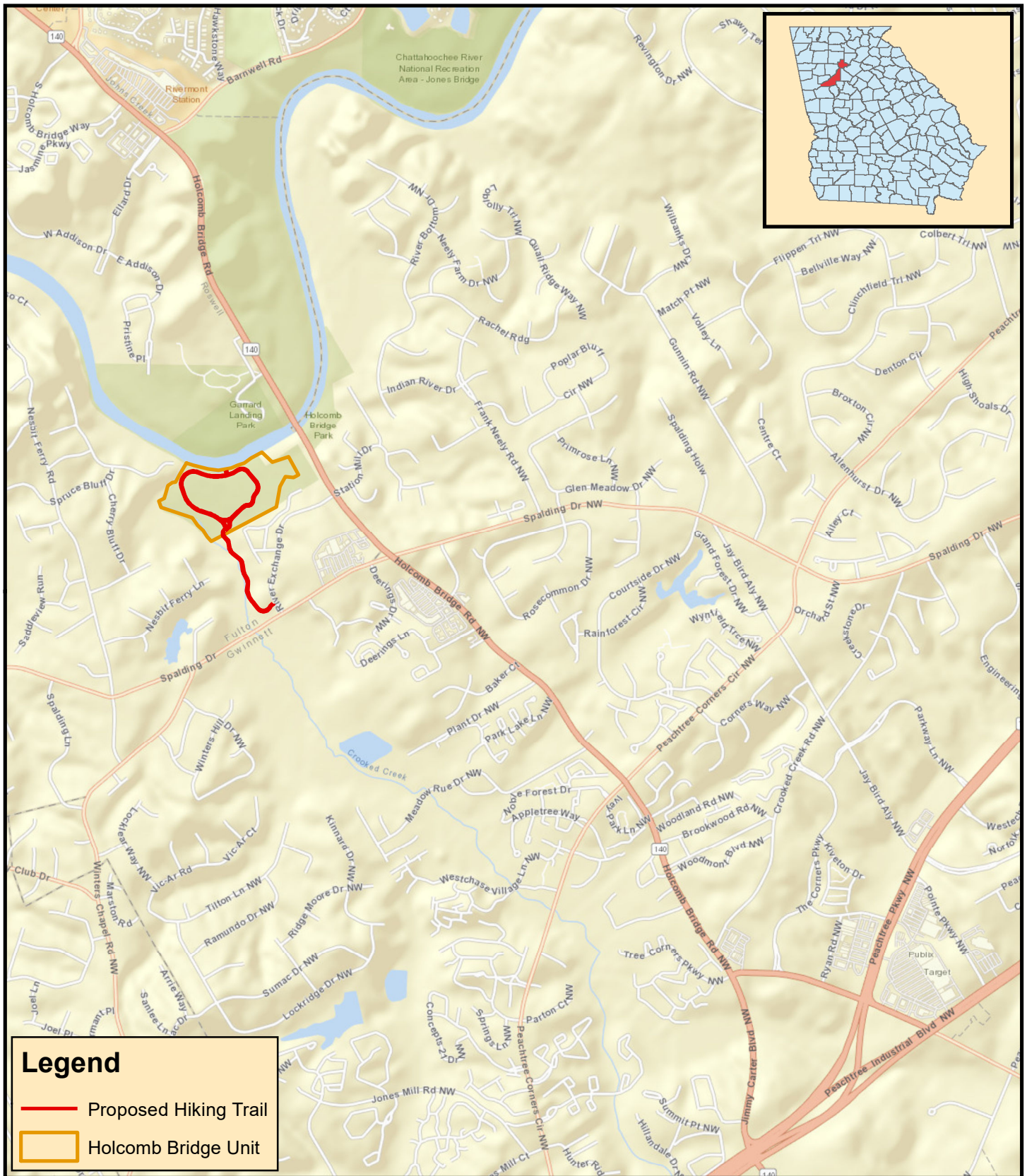
If you have any questions about this project, please contact Mr. Barksdale at (770) 653-0938, or via e-mail at [barksdalef@pondco.com](mailto:barksdalef@pondco.com).

Sincerely,



Flynt Barksdale, PWS  
Senior Scientist  
Pond and Company

**Attachment 1: Figures**



Service Layer Credits: Sources: Esri, HERE, DeLorme, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), MapmyIndia, NGCC, © OpenStreetMap

Figure 1  
Project Vicinity Map





Service Layer Credits: Esri, HERE, DeLorme, MapmyIndia, © OpenStreetMap contributors  
Esri, HERE, DeLorme, MapmyIndia, © OpenStreetMap contributors, and the GIS user community

Figure 2  
**Aerial Map**



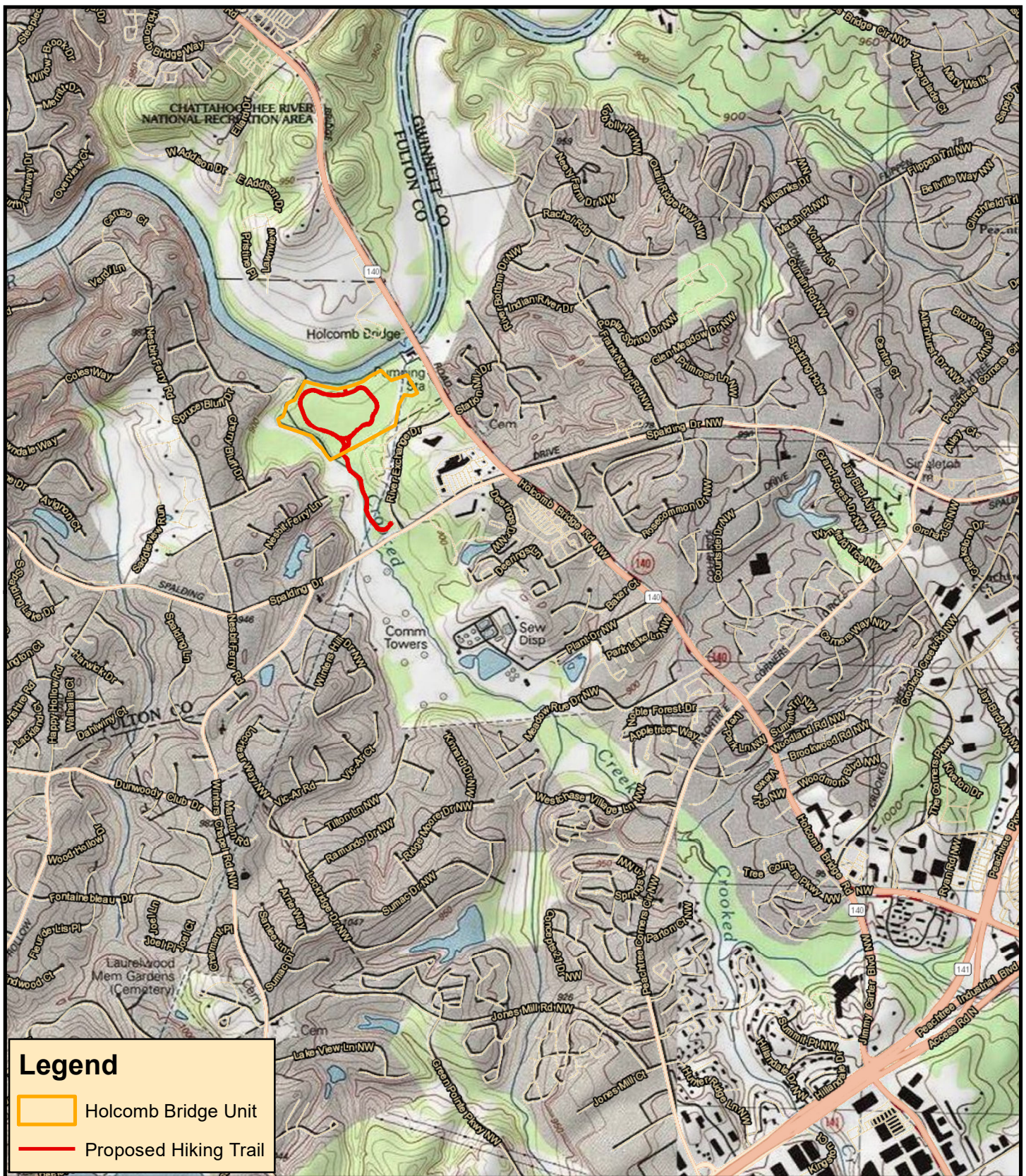


Figure 3  
Topographic Map





**Richard E. Dunn, Director**

---

**Watershed Protection Branch**

2 Martin Luther King, Jr. Drive  
Suite 1152, East Tower  
Atlanta, Georgia 30334  
404-463-1511

Mr. Flynt Barksdale  
Pond and Company  
3500 Parkway Lane  
Peachtree Corners, Georgia 30092

RE: National Park Service's Crooked Creek Park  
City of Sandy Springs

Dear Mr. Barksdale:

The Georgia Environmental Protection Division (EPD) is in receipt of your November 6, 2018 letter requesting input on potential environmental concerns that may relate to the National Park Service's proposal to construct a hiking trail in the City of Sandy Springs.

If the project is within the City limits of Sandy Springs then the City is responsible for issuing a Land Disturbance Permit in accordance with their erosion and sedimentation ordinance. The City must also ensure that all State waters within the project boundary are identified and determine whether or not a stream buffer variance is required for the project. If this project disturbs one acre or more, it will require coverage under the NPDES General Permit for Storm Water Discharges Associated with Construction Activity. Information and applicable forms for the stream buffer variance and the NPDES Construction Permit can be found on our website at <http://epd.georgia.gov/>

Should the Corps of Engineers determine that an individual Section 404 Permit is required for the project; a Section 401 Water Quality Certification should concurrently be sought from EPD.

If you have additional questions pertaining to NPDES or State water buffers, please contact me at (404) 651-8554. For questions pertaining to 401 Water Quality Certification, please contact Steve Wiedl, with the Wetlands Unit at (404) 651-8465.

Sincerely,

Michael Berry  
Erosion and Sedimentation Control Unit



National Park Service  
Chattahoochee River  
National Recreation Area  
1978 Island Ford Parkway  
Sandy Springs, GA 30350



OFFICIAL ELECTRONIC CORRESPONDENCE - NO HARD TO FOLLOW

IN REPLY REFER TO:

L7425 (5340)

February 27, 2019

Jennifer Dixon  
Historic Preservation Division, Department of Natural Resources  
2610 Georgia Highway 155, SW  
Stockbridge, GA 30280

Dear Ms. Dixon:

In compliance with Section 106 of the National Historic Preservation Act of 1966, as amended, (54 U.S.C. 306108), Chattahoochee River National Recreation Area, a unit of the National Park Service (NPS) is writing to you concerning the construction of a trail. The purpose of the project is to provide a designated hiking trail that connects the Holcomb Bridge Unit to the proposed Crooked Creek Park owned and under development by the City of Sandy Springs. The project is needed in order to provide a safe, sustainable trail, and controlled public access to the NPS Holcomb Bridge Unit from the proposed Sandy Springs Crooked Creek Park. The City of Sandy Springs has obtained access from an adjacent privately held parcel to establish an approximately 1-mile natural surface walking trail that would connect the Crooked Creek Park to the Holcomb Bridge Unit. The natural surface trail within the NPS Holcomb Bridge Unit would consist of an approximately 3,060 linear foot (LF) loop trail.

The trail would follow an existing, yet informal, trail utilized by fishermen and other community members. The proposed trail slightly varies from the existing, informal trail to minimize impacts to resources. Selective cutting and trimming of a 10-foot wide corridor for the trail is proposed to allow for the maintenance of a 3-foot wide natural surface trail. No mass grading will occur as a result of this project. There will be no mechanized grading, the trail is to be routed around all trees, and invasive plants within the 10-foot corridor will be removed.

Per the National Register of Historic Places (NRHP) GIS, there are no eligible cultural resources on, or adjacent to, the Holcomb Bridge Unit. Contact with the NPS, Southeast Archaeological Center (SEAC) provided some indication that the area has potential for archaeological resources. The NPS determines that this project will have *no adverse effect* on historic properties eligible or potentially eligible for listing in the National Register of Historic Places. If your office has suggestions or concerns, please reach out to discuss this project further. If you concur with this determination, please respond within 30 days, as provided by 36 CFR 800.5(b) and (c), then we will consider our responsibilities under Section 106 of the National Historic Preservation Act, as amended and 36 CFR Part 800 to be completed. If you do not concur, please contact Deanna

Greco at (678) 538-1321 or [deanna\\_greco@nps.gov](mailto:deanna_greco@nps.gov). Although the loss of a historic resource is disappointing, the NPS is dedicated to interpreting and sharing the history along the Chattahoochee River.

Sincerely,

A handwritten signature in dark ink, appearing to read "William L. Cox". The signature is fluid and cursive, with the first name "William" being more prominent.

William L. Cox  
Superintendent

Attachment: APE map and Design Development Plans





HISTORIC PRESERVATION DIVISION

MARK WILLIAMS  
COMMISSIONER

DR. DAVID CRASS  
DIVISION DIRECTOR

March 26, 2019

William Cox  
Superintendent  
Chattahoochee River National Recreation Area  
1978 Island Ford Parkway  
Sandy Springs, Georgia 30350  
**Attn: Deanne Greco**

**RE: Chattahoochee River NRA: Construct 1 mile Trail, Holcomb Bridge Unit, Sandy Springs  
Fulton County, Georgia  
HP-190304-003**

Dear Mr. Cox:

The Historic Preservation Division (HPD) has reviewed the information submitted concerning the above referenced project. Our comments are offered to assist the National Park Service and Chattahoochee River National Recreation Area (NRA) in complying with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA).

The subject project consists of constructing a one (1) mile trail and parking to connect the Holcomb Bridge Unit of the Chattahoochee River NRA in Sandy Springs to a proposed city park along River Exchange Drive in Peachtree Corners. Based on the information provided, HPD finds that the eligibility of the c. 1960 Ranch House located at 6020 Spalding Drive is unknown for listing in the National Register of Historic Places (NRHP). However, it is HPD's opinion that the subject project, as proposed, will have **no adverse effect** to historic properties within its area of potential effects (APE), as defined in 36 CFR Part 800.5(b), **provided the following condition is met:**

1. Maintain/install a vegetative buffer along the boundary of 6020 Spalding Drive to minimize the visual impact of the proposed project.

Please be aware that without subsurface inspection the presence of NRHP-eligible archaeological resources in the project's APE cannot be ruled out. In the event that archaeological materials are discovered during construction, HPD recommends contacting our office and ceasing all ground disturbing activities until these resources can be assessed by a qualified archaeologist.

Please refer to project number **HP-190304-003** in any future correspondence on this project. If we may be of further assistance, please do not hesitate to contact Emma Mason, Compliance Archaeologist at (770) 389-7877 or [emma.mason@dnr.ga.gov](mailto:emma.mason@dnr.ga.gov) or me at (770) 389-7851 or [jennifer.dixon@dnr.ga.gov](mailto:jennifer.dixon@dnr.ga.gov).

Sincerely,

Jennifer Dixon, MHP, LEED Green Associate  
Program Manager  
Environmental Review & Preservation Planning

cc: Allison Duncan, Atlanta Regional Commission

## Martin, Glenn

---

**From:** Martin, Glenn  
**Sent:** Thursday, June 27, 2019 6:02 AM  
**To:** Martin, Glenn  
**Subject:** FW: [EXTERNAL] SHPO Concurrence letter for Crooked Creek

**From:** Melville, Erich <erich\_melville@nps.gov>  
**Sent:** Monday, June 17, 2019 10:24 AM  
**To:** Martin, Glenn <MartinGI@pondco.com>  
**Cc:** Barksdale, Flynt <BarksdaleF@pondco.com>; Stevens, Kaili <StevensK@pondco.com>; Deanna Greco <deanna\_greco@nps.gov>  
**Subject:** Re: [EXTERNAL] SHPO Concurrence letter for Crooked Creek

### EXTERNAL EMAIL

I have spoken with the Superintendent and we have decided that the Park would like to move forward with finalizing the EA. Given that the proposed trail will require minimal disturbance and we have received a letter of clearance from SHPO, we feel comfortable with not performing a shovel test as recommended by SEAC. Instead, we will ensure that a monitor (an archaeologist) is present during trail construction, especially when digging will happen to construct the puncheons. This will be specifically listed in the construction permit as a mitigation measure. Please make note of this decision and rationale in the comment matrix. Let me know if there are any other questions. Thanks