National Park Service

U.S. Department of the Interior

Chattahoochee River National Recreation Area

Georgia

ENVIRONMENTAL ASSESSMENT FOR THE PACES MILL UNIT REHABILITATION

Finding of No Significant Impact
September 2022

Recommended: ANN HONIOUS Digitally signed by ANN HONIOUS Date: 2022.09.02 15:39:45 -04'00' Date: 9/2/2022

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INTRODUCTION

Chattahoochee River National Recreation Area (National Recreation Area or park), a unit of the national park system, encompasses a 48-mile section of the Chattahoochee River from Buford Dam to Peachtree Creek and more than 5,000 acres of adjoining lands within an authorized boundary of 10,000 acres, in northern Georgia. The National Recreation Area includes 15 units and had approximately 3.3 million visitors in 2021. Paces Mill, located in the National Recreation Area's Palisades unit, is the southernmost and farthest downstream facility of the National Recreation Area along the river. Paces Mill is adjacent to Cobb Parkway (US Highway 41 [US 41]) on the southeastern boundary of Cobb County, adjacent to Fulton County, in the northern Atlanta metropolitan area. Paces Mill is used most often during the summer months for river access, picnicking, and access to nearby hiking and biking trails. It is a key destination in the National Recreation Area.

The National Park Service (NPS) is proposing to rehabilitate and reconfigure Paces Mill, which will include upgrades to the site's physical design, appearance, and infrastructure to address current deficiencies. The rehabilitated site would create a strong NPS identity, improve the area's sustainability, and foster a safe and enjoyable visitor experience.

Paces Mill is the last public "take-out" on the river in the National Recreation Area. It is highly used by a concessioner and an estimated 270,000 visitors per year, despite being only 14 acres and in a flood zone that occasionally experiences high water. These conditions result in congestion on-site, which often leads to user conflicts. Paces Mill currently has the following deficiencies, which result in the site not adequately serving visitors or protecting park resources:

- The current parking lot design and location results in water pooling in the parking lot rather than draining into the river during flooding.
- The current parking lot design does not provide intuitive directional flow for vehicles, and the unloading/staging area at the northern boat ramp creates a bottleneck among multiple user groups that can lead to visitor conflicts.
- The current site design results in poor pedestrian circulation.
- The poor directional flow of traffic, coupled with lack of pedestrian infrastructure, creates safety concerns.
- There are problems with some site infrastructure, including water and sewerlines.
- The southern parking area is underused.
- There are no formal changing rooms, and the restrooms can be inadequate on busy summer days.
- Due to a lack of formal trails in the wooded area between the northern and southern boat ramps, visitors have created numerous social trails to view the river.
- Paces Mill lacks a strong NPS identity.

The existing physical configuration of Paces Mill is not efficiently meeting the needs of visitors and detracts from their enjoyment and safety. The rehabilitation would address physical site design,

appearance, infrastructure concerns, and deficiencies to create a sustainable facility with a strong NPS identity and enhance visitor enjoyment and experience, all while protecting natural resources.

Desired outcomes of the rehabilitation include the following:

- Improvements to site sustainability as related to water quality, energy efficiency, and native vegetation.
- Correction of existing site deficiencies, including vehicular and pedestrian circulation, drainage patterns, etc.
- Creation of a clear NPS identity for the site that establishes Paces Mill as a visual gateway to the National Recreation Area and part of a national park unit.
- Improvements to the visitor experience and to visitor safety.
- Enhancements to educational and interpretive programming on-site that improves visitor experience.
- Promotion of compatible outdoor recreation uses and a reduction in user group conflicts.

In compliance with the National Environmental Policy Act (NEPA) and the Council on Environmental Quality (CEQ) National Environmental Policy Act Implementing Regulations Interim Final Rule Extending Deadline for Revisions of Agency NEPA Procedures (June 2021), the National Park Service prepared an environmental assessment to examine alternatives and environmental impacts associated with rehabilitation of the Paces Mill site within the Chattahoochee River National Recreation Area.

PREFERRED ALTERNATIVE

Summary

Two alternatives were evaluated in the May 2022 environmental assessment: a no-action alternative (alternative A), which provides a basis for comparing environmental impacts of the action alternative and the action alternative (alternative B) (figure 1) described below. The statements and conclusions reached in this finding of no significant impact (FONSI) are based on documentation and analysis provided in the Paces Mill Unit Rehabilitation Environmental Assessment (2022) and associated decision file. The environmental assessment was made available for public review from May 9 to June 8, 2022. Seventeen pieces of correspondence were received during the comment period. As required by NPS *Management Policies 2006*, a determination of non-impairment is included as attachment A. Attachment B provides the errata of minor revisions and corrections of the environmental assessment.

Figure 1. Preferred Alternative Schematic Design

Based on the analysis presented in the environmental assessment and after considering public comments, the National Park Service selected alternative B (action alternative and NPS preferred alternative). Under the proposed action, the National Park Service will rehabilitate and reconfigure Paces Mill. This includes upgrading the physical design, appearance, and infrastructure to address current deficiencies; to create a sustainable unit with a strong NPS identity; and one that is safe, easy to access, and enjoyable to visit.

The National Park Service will enhance existing signage at both entrances to the site along US 41 with landscape plantings to improve sign visibility (figure 1). The entry road from US 41 southbound will be reconfigured with the addition of shade and evergreen trees (except within the 150-foot-wide Georgia Power easement), traffic calming speed tables, and 30 parking spaces. Both entry roads will accommodate two-way traffic. The existing multiuse path (part of the Mountain-to-River Trail) that runs parallel to the entry road will remain. The entry road comes to a "T" intersection. To the west, the southern boat ramp parking lot will be altered to include a turnaround area for boat trailers. The parking and turnaround areas will include 24 parking spaces plus an additional 4 parallel parking spaces large enough for vehicles with trailers.

A primary river access area for visitors on foot will be constructed to the east of the US 41 southbound entry road, under the Cobb Parkway / US 41 overpass. The river access will be composed of large, wide, concrete or stone "steps" that descend into the river. These "steps" will continue to serve as riprap while

also providing use as a river amphitheater seating area. The steps will be accessed via the sidewalk, which will be relocated to the southeast side of the entrance road.

The US 41 southbound entrance road will follow a similar alignment of the existing road under the bridge, and 15 parallel parking spaces will be added north of the bridge. The current road along the east side of the current parking lot will be converted to a hard-surface sidewalk. The two entry roads (from north and southbound US 41) will meet at a "T" intersection, and one two-way road will proceed to the northeastern portion of the unit. The existing bioswales in the area between US 41 and the entrance roads will be redesigned to be more functional and aesthetically pleasing. Two new crosswalks will be installed at the "T" intersection. A new bioswale will be located northwest of the "T" intersection and will filter stormwater from the palisade (cliff).

To create a more desirable NPS arrival experience, the parking lot will be moved to the northern end of the site. The existing parking lot will be replaced with a meadow consisting of native endemic prairie vegetation, and the new entrance road and parallel sidewalk will wrap around it. The entrance road will have a timber guardrail on either side to prevent vehicles from parking along the roadside. The entrance road will curve eastward and eventually align with the existing north boat ramp. There will be sidewalks running parallel to the entrance road. The existing bike share station will be relocated to the intersection of the entrance road and the west parking lot entrance, near its current location at the Bob Callan trailhead. A "jug handle" loop to the south of the road will allow space for vehicles to turn around and provide pull-through parking for vehicles with trailers. The entrances of the jug handle loop will align with the entrances of the new parking lot.

The new parking lot will be shaped like an elongated "U" and will have approximately 176 parking spaces. A sidewalk will run parallel around the parking lot. A river overlook will be located on the eastern edge of the parking lot and connected to it via a hard-surface path. The outer edge of the parking lot will have a curb with curb cuts to allow stormwater sheet flow into either the adjacent swale or the central bioswales. Stormwater will be naturally filtered through the two central bioswales before being piped to river rock riprap in the river.

A new visitor contact station and changing rooms will be constructed to the south of the parking lot. The visitor contact station will be unmanned and will be composed of three structures. It will incorporate two buildings with single-user restrooms/changing rooms and a central open-air pavilion. A sidewalk will lead north from the buildings, bisect the bioswales, and connect to the existing Bob Callan Trail. The trail will be tree lined (except within the 150-foot-wide Georgia Power easement) and will have bump-outs to accommodate benches along the trail.

A dumpster pad and dumpster will be located at the intersection of the boat ramp and east parking lot entrance. A crosswalk will be installed across the boat ramp to connect the sidewalks. Directly south of the boat ramp, the existing boardwalk will be enhanced to incorporate a shade structure and gathering area.

The meadow south of the visitor contact station will consist of native wildflowers and native grasses commonly found in a piedmont prairie ecosystem. A sidewalk will run along the southeastern edge of the meadow, connecting the boat ramp to the river amphitheater seating area. The wooded area southeast of the multiuse trail will remain, and additional picnic tables will be added to the existing picnic area. A natural-surface trail will meander through the woods and include a short trail to a river overlook. Minimal and selective vegetation removal will take place to accommodate the natural-surface trail and river overlook. No large trees will be removed.

STIPULATIONS AND BEST MANAGEMENT PRACTICES

The following stipulations and best management practices have been identified to minimize the degree, extent, and/or severity of potential adverse effects and will be implemented during the project. These best management practices, except where stated otherwise, are derived from NPS *Management Policies 2006* (NPS 2006).

General Construction Best Management Practices (BMPs). The following BMPs will be implemented:

- Ground disturbance, staging, and stockpiling areas will be located in parking areas or in previously disturbed sites within the project footprint to the greatest extent possible. All staging and stockpiling areas will be returned to preconstruction conditions.
- Construction zones will be identified and fenced with construction tape, silt fencing, or some similar material prior to any construction activity. Fencing will define the construction zone and confine activity to the minimum area required for construction. All protection measures will be clearly stated in the construction specifications and workers will be instructed to avoid conducting activities beyond the construction zone as defined by construction zone fencing.
- The NPS project manager will be responsible for ensuring the project remains within the construction area limits.
- Fugitive dust generated by construction will be controlled by water spraying at the construction site, if necessary. Any water used for dust control will be taken from hydrants in park administrative areas or a local source approved by the National Recreation Area.
- Equipment will be cleaned before coming on-site.
- To minimize possible petrochemical leaks from construction equipment, the contractor will regularly monitor and check construction equipment to identify and repair any leaks. A spill kit will be kept on-site at all times.
- Fuel will be stored in fuel trucks or aboveground storage tanks, and all fuel storage will be in staging areas. NPS-approved containment BMPs will be established in case of a spill.
- Tools, equipment, barricades, signs, demolition debris, and rubbish will be removed from the project work limits upon project completion.

Soils. The following measures will be implemented:

- Topsoil conservation measures will be employed. Topsoil will be stripped and replaced wherever possible to enhance revegetation following the construction phase.
- Disturbed soils are more susceptible to erosion and until revegetation takes place, standard erosion control measures such as silt fences and/or sandbags shall be used to minimize any potential soil erosion.
- Soils beneath the existing parking lot will be remediated prior to the area's conversion to a meadow as described in the prairie restoration plan (appendix H in the environmental assessment).

Vegetation. The following measures will be implemented:

- Disturbance to existing vegetation will be avoided to the greatest extent possible.
- During construction, a temporary construction limit fence will be placed within the project footprint to protect native vegetation.
- Vehicles, equipment, and storage and staging for materials will occur within the project footprint.
- Equipment used will be cleaned prior to arrival on-site to reduce the introduction of nonnative plant species.
- All equipment and materials will be staged on hardened surfaces, such as roadways and parking areas, to avoid damage to vegetation.
- Native plant species will be planted in the meadow in greater numbers than those removed in reconfiguring the unit.

Wildlife. Including Threatened and Endangered Species. The following measures will be implemented:

- To reduce effects to migratory birds during nesting season, tree, shrub, and grass removal activities will be avoided from March 1 to August 15, to the extent practicable. If tree, shrub, and grass removal will occur within the specified dates, an NPS biologist will be contacted to schedule a survey of the project site prior to tree removal.
- An NPS biologist will survey the proposed natural-surface trail for Michaux's sumac prior to any vegetation removal.
- All construction activities will cease if a threatened or endangered species were discovered in the project area while park staff re-evaluates the situation. This will allow modification of the project for any protection measures determined necessary to protect the species.

Soundscapes and Air Quality. The following measures will be implemented:

- Construction activity will only be permitted during daylight hours to minimize noise impacts to residential neighbors.
- To reduce noise and emissions, construction equipment will not be permitted to idle for more than 10 minutes while not in use based on 36 *Code of Federal Regulations* (CFR) § 5.13 Nuisances.
- Appropriate dust mitigation suppression controls, such as water spraying soils at the construction site and covering loaded trucks, will be implemented if needed.

Cultural Resources. The following measures will be implemented:

- If previously unknown archeological or paleontological resources are discovered during construction, the superintendent will be notified,and all work in the immediate vicinity (200 feet) of the discovery will be halted until the resources are assessed by an archeologist meeting NPS

Professional Qualifications Standards or the Secretary of the Interior's Professional Qualifications Standards.

- In the unlikely event human remains are discovered during construction, provisions outlined in the Native American Graves Protection and Repatriation Act of 1990 and NPS Director's Order 28: *Cultural Resource Management* will be followed.
- The National Park Service will ensure that all contractors and subcontractors will be informed of the penalties for illegally collecting artifacts or intentionally damaging archeological sites or historic properties. Contractors and subcontractors will also be instructed on procedures to follow should previously unknown archeological resources be uncovered during construction.

Visitor Use and Experience. The following measure will be implemented:

- Existing vegetation and natural topography will be preserved as much as possible to screen new infrastructure from view.

After completing the environmental analysis, the National Park Service selected alternative B for implementation because it meets the purpose and need to provide a sustainable facility with a strong NPS identity and enhance visitor enjoyment and experience, while providing safer access and protecting natural resources for future generations. Alternative B best protects natural resources, including special status species, by creating a piedmont meadow with native plant species, including the Georgia aster (*Symphyotricum georgianum*).

The no-action alternative would not meet the purpose and need to rehabilitate and reconfigure Paces Mill. It would also fail to increase the quantity and diversity of native vegetation on-site. It would not include measures to increase safety through automobile and pedestrian flow improvements as well as improvements to sight lines that could improve the occurrence of illicit activities.

OTHER ALTERNATIVES CONSIDERED

The National Park Service also analyzed the no-action alternative for the proposed Paces Mill Rehabilitation. The no-action alternative examines baseline conditions against which to compare the action alternative.

Under the no-action alternative, the National Park Service would not rehabilitate Paces Mill. The existing configuration and infrastructure would remain in place. National Recreation Area staff would only take actions to address visitor safety concerns. There would be no further design, planning, or construction. The site would continue to experience poor drainage after heavy rain or high-water events. Parking, vehicular movements, and pedestrian circulation would continue to be inefficient and cause conflicts between user groups. There would be no changing rooms, and restroom capacity would be unable to meet visitor demand on busy days. Social trails would continue to proliferate in the site's wooded area. The site would continue to lack a strong NPS identity.

The no-action alternative does not meet the project's objectives to create a more sustainable site; correct vehicular and pedestrian circulation and water retention; create a clear NPS identity; provide visitors

with an improved, safe experience; provide enhanced educational and interpretive programming; and create a site that more clearly promotes outdoor recreation and encourages compatible recreational uses.

No other action alternatives were analyzed.

As described in the environmental assessment, which considered the degree of effects against the potentially affected environment, the selected alternative will have no significant adverse impacts on cultural or natural resources. However, the selected alternative could have adverse impacts on wetlands, floodplains, and visitor use and experience. Potential adverse impacts on park resources would not be significant, as described in the environmental assessment and in this FONSI. Stipulations and best management practices are included to minimize all adverse effects resulting from construction.

The selected alternative will have long-term beneficial impacts on visitor use and experience, visitor safety, vegetation, and special status plant species, which will result from improvements to infrastructure that will better serve visitors and improve site drainage and the creation of a piedmont prairie meadow that will increase the quantity and diversity of native plants, including the special status Georgia aster, at Paces Mill.

Adverse impacts are anticipated to be limited to the short-term period associated with construction. These impacts include partial closures of Paces Mill to visitor use during construction for up to 11 months. Nearby trails outside the construction area in Palisades (West) will remain open during the site's temporary closure, and river access will still be available just upriver at the Johnson Ferry (North) and Cochran Shoals (Powers Island) units. As with all surface disturbing projects, construction activities and post-construction demobilization have the potential to introduce noxious weeds to the project area. The likelihood of noxious weed introduction will be minimized with the mitigations and best management practices outlined in the environmental assessment. The benefits of the resulting meadow ecosystem will be greater than the short-term potential for introducing invasive plants.

Although during construction the site will be partially closed, one boat ramp will always remain open for law enforcement use and emergency response operations. Once constructed, the rehabilitated site will improve safety on the site through improvements in traffic and pedestrian circulation and reducing conflicts from user conflicts. Formalizing a trail through the wooded area and the parking lot reconfiguration is likely to reduce the occurrence of social trailing (i.e., unauthorized visitor-created trails) and illicit activities through improved sight lines.

As described in the environmental assessment, the following resources will not be affected by the project: prime farmlands, wild and scenic rivers, archeological resources, historic resources, and cultural landscapes. The selected alternative will affect less than 0.1 acre of wetlands in the form of converting existing riprap into concrete steps into the Chattahoochee River as part of a river amphitheater. Because the work only involves replacing an existing human-made stone bank with different stone, no natural ecological function will be adversely impacted. The work will be permitted with a nationwide permit and will be below the NPS threshold requiring any mitigation. The entire site is in the 100-year floodplain and Federal Emergency Management Agency (FEMA) Zones AE and A (FEMA 2019) and its purpose is river access, therefore flooding is to be expected. However, flooding would primarily have adverse impacts during major flooding events where water inundates parking, roads, and the restrooms, and damages infrastructure. Small beneficial effects are expected from the new design elements, which would reduce water pooling on hard-surface parking lots after flooding, facilitate water drainage through bioswales to the river. Infrastructure, such as the new visitor contact station, would likely be more resistant to flood damage.

There are five federal threatened and endangered species that could occur in Cobb County: little amphianthus (*Amphianthus pusillus*), white fringeless orchid (*Platanthera integrilabia*), Michaux's sumac (*Rhus michauxii*), northern long-eared bat (*Myotis septentrionalis*), and Cherokee darter (*Etheostoma scotti*). There is no designated critical habitat for any of these species in Cobb County. There is no suitable habitat for four of these species at Paces Mill, as described in the environmental assessment. Michaux's sumac has been recently documented in another unit of the National Recreation Area. Its presence in the wooded area adjacent to the river at Paces Mill has not been documented; however, it cannot be completely ruled out. A presence/absence survey will be conducted prior to trail construction, and construction contractor(s) will adhere to the mitigations and best management practices listed in the environmental assessment to minimize the loss of vegetation in the project area. Furthermore, the very limited nature of work that will be completed in the wooded area, coupled with the pre-construction survey and identified mitigations, will minimize the potential for any impacts on Michaux's sumac. Based on these factors, the National Park Service determined that there will be no effect on endangered or threatened species from the project. Therefore, no consultation with the US Fish and Wildlife Service under section 7 of the Endangered Species Act was necessary.

CONSULTATIONS

Between February 18 and 21, 2020, NPS Southeast Archeological Center (SEAC) archeologists conducted an archeological investigation at Paces Mill. The investigation consisted of a ground penetrating radar survey and a systematic shovel test survey. The purpose of this investigation was to determine if any archeological resources were present and to evaluate their significance prior to proposed construction to upgrade the facilities and infrastructure at Paces Mill. The investigation did not reveal the presence of archeological deposits or features that would be impacted by ground-disturbing activities. For the areas that were tested, SEAC recommended the National Recreation Area proceed with the proposed action without any effect to historic properties, with the concurrence of the Georgia Department of Community Affairs, Historic Preservation Division (HPD).

The National Park Service completed consultations with HPD, affiliated tribes and other consulting parties as mandated by the implementing regulations (36 CFR 800) for section 106 of the National Historic Preservation Act of 1966, as amended. The National Park Service sent HPD a letter on May 2, 2019, with a determination that no historic properties that are listed or eligible for listing on the National Register of Historic Places will be affected by the proposed action, as defined in 36 CFR Part 800.4(d)(1). HPD responded on May 29, 2019, with a request for additional information. On June 4, 2020, the park provided additional information with a "no adverse effect" determination. HPD concurred with the NPS finding of effect on June 22, 2020. As the project design changed, the National Park Service continued consultation with HPD to determine that no historic properties will be affected on the southwestern side of US 41 in a letter on May 19, 2021. The HPD concurred with the finding on June 8, 2021.

The National Park Service initiated tribal consultation by sending formal consultation letters to 14 tribal groups on June 8, 2021, inviting participation and requesting comments. No response was received from the tribes.

PUBLIC INVOLVEMENT

On June 17, 2019, the National Recreation Area began early civic engagement by releasing a newsletter notifying the public and stakeholders that the National Park Service was considering rehabilitation of Paces Mill. The newsletter outlined the reasons for rehabilitation, desired outcomes, and potential

changes under consideration. The newsletter was released to the public for review and comment via the NPS Planning, Environment, and Public Comment (PEPC) website and e-mailed to partner agencies, relevant jurisdictions, and key stakeholders. In addition, a legal notice was published in the *Atlanta Journal Constitution* on June 23, 2019. The public was invited to submit comments electronically through the PEPC website or by mailing comments directly to the National Recreation Area. Comments were requested by July 7, 2019.

Eight pieces of correspondence from the local community were received during the civic engagement period. Comments included general support for the project, support for specific components, suggestions for specific improvements, requests for clarification of design details, identification of issues to consider, and organizations to consult. The National Park Service used these comments to inform which issues were retained for detailed analysis.

The environmental assessment was released to the public on May 9, 2022, via PEPC. To inform the public of the environmental assessment's release and public comment period, the National Park Service posted a news release on the National Recreation Area website, and park staff posted on official social media accounts. The environmental assessment provided descriptions of the purpose and need for action, the "no action" and preferred "action" alternatives and a detailed analysis of environmental impacts from the proposed project. The public was invited to submit comments on the environmental assessment electronically through the PEPC website or by mailing comments directly to the National Recreation Area. Comments were requested by June 8, 2022.

A total of 17 correspondences were received on the environmental assessment. The comments resulted in minor edits to text in the environmental assessment. These changes correct, clarify, or modify original text. There are no edits or corrections that modify the determination of potential effects or that substantively amend the proposed action. The text changes are documented in an errata, attached as attachment B to this FONSI.

CONCLUSION

As described above, the selected alternative does not constitute an action that normally requires preparation of an environmental impact statement. The selected alternative will not have a significant impact on the human environment. There will be no adverse impacts to physical resources, water resources, natural resources, cultural resources, or other unique resources in the project area or surrounding environs. No highly uncertain or controversial impacts, unique or unknown risks, or known cumulative effects were identified.

After careful and thorough consideration of the facts contained herein, the National Park Service finds that the proposed federal actions are consistent with existing national environmental policies and objectives as set forth in section 101(a) of NEPA, and that they will not significantly affect the quality of the human environment or otherwise include any condition requiring consultation pursuant to section 102(2)(c) of NEPA.

Therefore, it has been determined that an environmental impact statement is not required for this project and thus will not be prepared.

ATTACHMENT A: DETERMINATION OF NON-IMPAIRMENT

PACES MILL UNIT REHABILITATION

ENVIRONMENTAL ASSESSMENT

WHY IS A NON-IMPAIRMENT DETERMINATION REQUIRED?

By enacting the National Park Service (NPS) Organic Act of 1916 (Organic Act), Congress directed the US Department of the Interior and the National Park Service to manage units "to conserve the scenery and the natural and historic objects and wildlife therein and to provide for the enjoyment of the same in such a manner and by such a means as will leave them unimpaired for the enjoyment of future generations" (54 USC 100101).

NPS *Management Policies 2006*, section 1.4 explains the prohibition on impairment of park resources and values. Section 1.4.5 defines impairment as "an impact that, in the professional judgment of the responsible NPS manager, will harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values."

Section 1.4.5 goes on to state that:

- [a]n impact to any park resource or value may, but does not necessarily, constitute impairment. An impact would be more likely to constitute impairment to the extent that it affects a resource or value whose conservation is:
    - necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park,
    - key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or
    - identified as a goal in the park's general management plan or other relevant NPS planning documents as being of significance.

  An impact would be less likely to constitute an impairment if it is an unavoidable result of an action necessary to preserve or restore the integrity of park resources or values and it cannot be further mitigated.

Section 1.4.6 of NPS *Management Policies 2006* identifies the park resources and values that are subject to the no-impairment standard:

The "park resources and values" that are subject to the no-impairment standard include:

- the park's scenery, natural and historic objects, and wildlife, and the processes and condition that sustain them, including, to the extent present in the park: the ecological, biological, and physical processes that created the park and continue to act upon it; scenic features; natural visibility, both in daytime and at night; natural landscapes; natural

soundscapes and smells; water and air resources; soils; geological resources; paleontological resources; archeological resources; cultural landscapes; ethnographic resources; historic and prehistoric sites, structures, and objects; museum collections; and native plants and animals;

- appropriate opportunities to experience enjoyment of the above resources, to the extent that can be done without impairing them;
- the park's role in contributing to the national dignity, the high public value and integrity, and the superlative environmental quality of the national park system, and the benefit and inspiration provided to the American people by the national park system; and
- any additional attributes encompassed by the specific values and purposes for which the park was established.

HOW IS A NON-IMPAIRMENT DETERMINATION MADE?

Section 1.4.7 of NPS *Management Policies 2006* states that

> "[i]n making a determination of whether there would be an impairment, an NPS decision maker must use his or her professional judgment. This means that the decision-maker must consider any environmental assessments or environmental impact statements required by the National Environmental Policy Act of 1969 (NEPA); consultations required under Section 106 of the National Historic Preservation Act (NHPA); relevant scientific and scholarly studies; advice or insights offered by subject matter experts and others who have relevant knowledge or experience; and the results of civic engagement and public involvement activities relating to the decision."

NPS *Management Policies 2006* further define "professional judgment" as

> "a decision or opinion that is shaped by study and analysis and full consideration of all the relevant facts, and that takes into account the decision-maker's education, training, and experience; advice or insights offered by subject matter experts and others who have relevant knowledge and experience; good science and scholarship; and, whenever appropriate, the results of civic engagement and public involvement activities in relation to the decision."

HOW IS A WRITTEN NON-IMPAIRMENT DETERMINATION PREPARED?

This determination on impairment has been prepared for the selected alternative described in this finding of no significant impact (FONSI). An impairment determination is made for the resource topics of floodplains, vegetation, and special status species (Georgia aster). These resources are considered fundamental to Chattahoochee River National Recreation Area. Visitor use and experience and visitor safety are not generally considered to be park resources or values according to the Organic Act and cannot be impaired in the same way that an action can impair park resources and values; therefore, these resource topics are not included in this non-impairment determination. This determination has been prepared for the selected alternative (alternative B) described in chapter 2 of the Chattahoochee River National Recreation Area Paces Mill Unit Rehabilitation Environmental Assessment.

FLOODPLAIN

No impairments to the Chattahoochee River floodplain are anticipated from the selected alternative. All project components are expected to have either neutral or minor beneficial effects. The risk of flooding will remain similar to current conditions. The project does not include any changes that will reduce flood storage capacity. The design of the parking lot and drainage system, including bioswales, have features designed to improve drainage patterns, which will contribute to flooding resilience during high water events. Floodwaters temporarily stored on-site will be more likely to occur in landscaped and natural areas rather than in the parking lot. The visitor contact station, including restrooms, will be consistent with the intent of the standards and criteria of the National Flood Insurance Program. Natural resources such as the woodlands bordering the river will remain in similar condition and quantity. Riprap installed at drainage outfalls to the river will minimize the potential for bank cut and erosion.

The selected alternative will not result in impairment of the floodplain, as there will be no adverse impacts as described above. The floodplain of the Chattahoochee River will continue to function.

VEGETATION

While the action alternative does involve vegetation removal for construction, the proposed action will have net beneficial effects on vegetation at Paces Mill in the long term. The proposed piedmont prairie meadow will replace an existing mown field that largely consists of nonnative grasses and weeds. The planting of native prairie vegetation will increase the quantity of native plants and pollinator species on-site. Furthermore, the formalization of the natural-surface trail through the wooded areas along the riverbank will deter existing occurrences of social trailing that fragment vegetated areas. The trail alignment will avoid tree removal to the extent practicable.

The selected alternative will not result in impairment of vegetation because adverse impacts will be minor and temporary as described above. Most effects on vegetation from the selected alternative will be beneficial in the long term.

SPECIAL STATUS SPECIES

There will likely be a net long-term increase in the number of Georgia aster observed at Paces Mill. More individuals will be planted than were previously present, and the larger, contiguous prairie ecosystem created will likely result in a healthier native plant community. The resulting meadow will also be fenced to protect native prairie vegetation, thus providing more protection for special status species and vegetation that currently exists.

The selected alternative will not result in impairment of the Georgia aster, as only beneficial effects are expected.

CONCLUSION

The National Park Service has determined that the implementation of the NPS selected alternative will not constitute an impairment of the resources or values of the Chattahoochee River National Recreation Area. As described above, implementing the selected alternative is not anticipated to impair resources or values that are essential to the purposes identified in the establishing legislation of the park, key to the natural or cultural integrity of the park, or identified as significant in the park's relevant planning documents. This conclusion is based on consideration of the park's purpose and significance, a thorough

analysis of the environmental impacts described in the environmental assessment, the comments provided by the public and others, and the professional judgment of the decision-maker guided by the direction of the NPS *Management Policies 2006*.

ATTACHMENT B: PACES MILL ENVIRONMENTAL ASSESSMENT ERRATA

The errata documents minor edits to text in the environmental assessment. These changes correct, clarify, or modify original text. There are no edits or corrections that modify the determination of potential effects or that substantively amend the proposed action. The environmental assessment, together with the FONSI and this errata sheet, comprise the full and complete record of the environmental impact analysis for this project. Changes to the text and justification are provided below. Additions to the text are underlined and deleted text is shown in ~~strikeout~~.

Page 1, Background, paragraph 3; Page 13, Alternative B, paragraphs 3 and 4; Page 14, paragraphs 2, 3, 4; Page 19, Table 3, "Visitor Contact Station" and "Meadow…" rows; Page 42, Vehicular Circulation and Parking Capacity, paragraph 1; Page 43, Conclusion.

"~~hard-surface trail~~" and "~~multiuse trail~~" is replaced with "sidewalk."

Page 9, Table 2, Socioeconomics, first paragraph

Potential reductions in revenue from float trips are anticipated. A construction phasing plan would be implemented to allow for concessioner use of one of the boat ramps during the summer to the extent practicable. ~~If construction duration is closer to the low estimate and misses the peak summer season, impacts would be smaller. Impacts to concessioner revenue is not central to the proposal and~~ A detailed financial analysis of potential lost concessioner revenue is not necessary to make a reasoned choice between alternatives. It is therefore not analyzed in detail.

Page 17, Stipulations and Best Management Practices, Vegetation, Add to the end of first bullet

No large trees would be removed except in the vicinity of the existing restrooms.

Page 19, Table 3, "Elements" Column

"~~Vendor Pickup Area /~~"

Page 19, Table 3, "Meadow with Native Endemic Prairie Plant Species" row, "Preferred Alternative" column

Existing large trees would be retained ~~to the extent practicable~~.

Page 22, Figure 4 – Preferred Alternative Schematic Design

"~~VENDOR PICKUP AREA / BOAT RAMP~~" is replaced with "SOUTH BOAT RAMP."

"~~LIMITED RIVER ACCESS~~" is replaced with "NORTH BOAT RAMP."

Page 28, Table 4, additional row

"Alternatives or Elements Considered" - Pervious Pavement

"Reason for Dismissal" - Pervious pavement would be too weak for the high volume of traffic common at Paces Mill. This option also presented ongoing maintenance concerns due to damage potential from flooding. There would also be an additional cost for pervious pavement. The combination of these factors made the option duplicative of less expensive alternatives.