

**National Park Service
U.S. Department of the Interior**

**Chattahoochee River National Recreation Area
Georgia**



**FINDING OF NO SIGNIFICANT IMPACT
Comprehensive Trails Management Plan
Chattahoochee River National Recreation Area**

December 2022

Recommended:

Ann Honious
Superintendent, Chattahoochee River National Recreation Area

Date

Approved:

Mark A. Foust
Regional Director, Interior Region 2, South Atlantic – Gulf

Date

This page intentionally blank.

CONTENTS

Introduction.....	1
Selected Alternative and Rationale for the Decision	1
Rationale	3
Mitigation Measures	3
Finding of No Significant Impact	10
Vegetation.....	10
Wildlife – Birds, Denning Mammals, and Herptiles.....	11
Soils.....	13
Wetlands	13
Visitor Use and Experience	14
Archeological and Historic Resources	15
Agency and Tribal Consultation	15
Conclusion	17
Attachment A: Public Comment Response Report	18
Attachment B: Finding of Non-Impairment	38
Attachment C: Errata	42
Attachment D: Programmatic Agreement for Compliance with the National Historic Preservation Act for Undertakings Implemented Under the Chattahoochee River National Recreation Area Comprehensive Trails Management Plan	50

INTRODUCTION

In compliance with the National Environmental Policy Act (NEPA) and the Council on Environmental Quality National Environmental Policy Act Implementing Regulations (87 23466), the National Park Service (NPS) prepared an environmental assessment (EA) to examine alternatives and environmental impacts associated with a proposed comprehensive trail management plan for Chattahoochee River National Recreation Area in the Atlanta metropolitan area of Georgia. Chattahoochee River National Recreation Area is referred to as “the park” in this document. The purpose of the proposed project is to provide guidance for improving trail conditions and connecting the 15 park units within the national recreation area as part of a sustainable, accessible, and regionally integrated trail system. The plan is needed to protect natural and cultural resources through sustainable trail management practices; enhance visitor use and the visitor experience; adjust park zoning to match desired visitor experience; and develop a more cohesive trail network within and between individual park units within the Chattahoochee River National Recreation Area and the Atlanta regional trail network.

The EA analyzed two alternatives: the no-action alternative, which provides a basis for comparing environmental impacts of the action alternative, and one action alternative for implementing changes to the existing trail system.

The statements and conclusions reached in this finding of no significant impact (FONSI) are based on documentation and analysis provided in the *Comprehensive Trails Management Plan/Environmental Assessment* (2022) and associated decision file. The EA was made available for public review from April 1 through May 3, 2022. During the comment period, the National Park Service received 91 pieces of correspondence. Some changes were made to the EA based on correspondences received, including clarifications and updates to facts presented. The changes did not result in any changes in impacts evaluated in the EA, as edits in this section were purely clarifications of analysis presented. Attachment A provides the public comment report, including NPS responses to substantive and non-substantive comments received on the EA. As required by NPS *Management Policies 2006*, a determination of non-impairment is included as attachment B. Attachment C provides the errata of minor revisions and corrections of the Environmental Assessment. Attachment D is a copy of a programmatic agreement for compliance with the National Historic Preservation Act for implementation of the trails plan. The FONSI, EA, and errata constitute the final decision for implementing this site-specific trail work at Chattahoochee River National Recreation Area.

SELECTED ALTERNATIVE AND RATIONALE FOR THE DECISION

Based on the analysis presented in the EA and after considering public comments, the National Park Service selected alternative 2 (proposed action and NPS preferred alternative). Under the selected alternative, the National Park Service will amend certain portions of the 2009 general management plan, redevelop the trail system to improve its overall sustainability, protect the park’s resources, and improve the visitor experience and circulation.

This plan is consistent with the parkwide guidance laid out in the park's 2009 general management plan, including zoning, with certain implementation-level details refined for clarity. In limited instances, management zoning was amended in the trails plan to better reflect park goals for managing those areas of the park. These adjustments, along with the reasoning behind them, are articulated in chapter 2 of the EA under the "Alternative 2: Unit-Specific Descriptions" section. The final zoning scheme described in this plan represents the most current zoning for the park as part of its planning portfolio (see Director's Order 2: *Park Planning*). The order addresses multiple planning statutory requirements for the trail system, including types and intensities of use and visitor capacities. Final zoning is also consistent with desired conditions for trails articulated in the EA.

The overall mileage of designated trails available for public use in the park will increase substantially, and a focus will be placed on improving the quality of the trails to better serve visitors and achieve greater resource stewardship. Visitor activities such as hiking, walking, exercising leashed pets, wildlife watching, and running will continue on park trails. Bicycling will continue to be allowed on designated trails in the Cochran Shoals unit, Palisades unit, and on trails designated as part of the potential regional greenway. The limited equestrian use that does occur at Bowmans Island will be phased out.

The National Park Service will construct a trail system that accounts for 99.3 miles of designated trail use in 14 of the 15 units in Chattahoochee River National Recreation Area. The resulting trail mileage is a summation of existing trails and adopted social trails, plus new trails, less trail restoration. Approximately 32 miles of trails will be added to the official trail system, resulting in a 48% increase in trail mileage. These trail additions do not account for the potential regional greenway trail mileage, which will result in an even higher total count of trail mileage and will provide more multiuse activities in more park units. After this FONSI is finalized, and in accordance with 36 CFR 4.30, the National Park Service will provide a superintendent's written determination stating that the addition of bicycle use on new and existing trails is consistent with protecting the park's natural, scenic, and aesthetic values; is consistent with management objectives; will not disturb wildlife or park resources; and has considered safety. The park will obtain the regional director's written approval of the determination and promulgate a special regulation authorizing bike use on new and existing trails (where bicycle use is not currently authorized). Bike use on these trails will not occur until a final rule is promulgated allowing such use.

This EA contains compliance for site-specific trail corridors within Chattahoochee River National Recreation Area. The new trail alignments were determined at the corridor level, defined as a 60-foot-wide corridor within which the new trail will be constructed. The width of the trail tread and shoulders within the corridor will be determined by the trail type (see the EA, table 5). The entire length of the selected alternative's trail mileage and width per trail type is referred to as the project area. Final trail alignments will be determined on the ground upon implementation and in consultation with park natural and cultural resources specialists, which could result in minor adjustments to the trail locations shown on the maps. If a need exists to align a trail outside of the identified corridor, the amended alignment will undergo additional review (and associated compliance, as needed) to avoid or minimize

impacts to sensitive resources, and the change would be documented as an amendment to the trails management plan.

Up to 69 acres will be disturbed during the construction period, which will occur in phases as resources allow. Sustainable design concepts and construction techniques will be used to quickly eliminate water from the trail system after a rain event, which will reduce erosion, standing water, and long-term trail maintenance needs.

Rationale

The National Park Service selected alternative 2 (preferred alternative) because:

- It is consistent with the park's enabling legislation and meets the purpose of and need for the action by providing the most total trail mileage (pedestrian only and multiuse) for viewing and enjoying the park's resources while improving the trail system's overall sustainability, protecting the park's resources, and improving the visitor experience and circulation.
- It will improve the quality of the trails to better serve visitors and achieve greater resource stewardship.
- It will provide opportunities for visitors to enjoy the park, gain appreciation of park resources, and derive inspiration from the resources.
- It includes mitigation measures to avoid and minimize impacts on park resources and visitors. While some resources will experience long-term, adverse impacts, there is no potential for significant impacts to occur.

Mitigation Measures

The National Park Service places a strong emphasis on avoiding, minimizing, and mitigating potentially adverse environmental impacts. To avoid, minimize, or mitigate impacts, the following strategies will be used during or following construction. These best management practices, except where stated otherwise, are derived from *NPS Management Policies 2006* (NPS 2006).

General

- According to *NPS Management Policies 2006*, for all trail construction activities, park staff will strive to apply sustainable practices to minimize potential environmental impacts. New or rerouted trails will not compete with or dominate park features or interfere with natural processes, such as the seasonal migration of wildlife, forest regeneration, hydrologic activity, and geological processes. All trail work will emphasize environmentally sensitive construction, use of nontoxic materials, resource conservation, and recycling.
- In areas where additional improvements to infrastructure are necessary, existing trailheads and previously disturbed areas will be used where practicable to avoid or minimize new impacts to natural and cultural resources in the park.

- Resource management staff will provide all contractor employees and volunteer trail crews with information that will apprise them of and sensitize them to relevant natural resource issues and the importance of minimizing impacts. This information could be shared in person, via contract language or as part of an informational package. Trail crews will be educated about the importance of avoiding impacts on sensitive resources that have been flagged for avoidance, which may include natural and cultural resources. The resource management division will be notified and consulted when wildlife must be disturbed or handled.
- Construction zones for rerouted and new trails, as well as staging areas and work zones, will be identified and demarcated with construction tape or something similar before any construction activities begin. The tape will define the zones and confine the activity to the minimum area needed for the trail work. No disturbance will occur beyond these limits, other than protection measures for erosion/sediment control.
- All tools, equipment, surplus materials, and rubbish will be removed from the project area upon project completion. Construction debris will be hauled from the park to an appropriate disposal location.
- Signs communicating resource protection closures or other means will be used to protect sensitive resources on or adjacent to trails and destinations.
- Visitors will be informed of the importance of protecting the park's natural resources and leaving these undisturbed for the enjoyment of future generations. Leave No Trace and Tread Lightly! materials will be posted at the visitor center and online and distributed, as appropriate.
- Impervious surfaces will not be used on trails.

Visitor Safety

- Construction activities will be scheduled to minimize construction-related impacts on visitors. Areas not under construction will remain accessible to visitors as much as is safely possible.
- The National Park Service will implement measures to reduce adverse effects of construction on visitor safety. Measures may include, but are not limited to, noise abatement, visual screening, and directional signs that aid visitors in avoiding construction activities.
- Per NPS standards, NPS staff will coordinate and supervise any trail construction or maintenance. Specifically, the National Park Service will monitor and/or direct placing all water bars; placing drainage; brushing and clearing; revegetating; selecting where to obtain fill and other materials for trails; and determining how to apply fill materials, such as soil, gravel, and rocks. The park's sustainable trail guidelines (see appendix F of the EA) will guide trail construction and maintenance.

- To minimize ground disturbance, staging areas will be in previously disturbed areas, away from areas of high visitor use where possible. All staging and stockpiling areas will use existing disturbed lands, where possible, and will be rehabilitated to natural conditions following trail construction work.
- The park will implement timely and accurate communication with visitors, such as changes to programs, services, sites, or permitted activities via news releases, visitor contacts, the park website, social media, and signage.

Natural Resources

Vegetation – Native

- New and existing trails will avoid rare plant species or large tracts of forest areas with high diversity and quality. Analysis of trail corridors has determined that there would be no potential for significant impacts to rare or threatened or endangered species, but corridors will be reevaluated at the time of implementation to ensure that sensitive species have not grown in and threatened and endangered species have not appeared in new locations. Two actions will occur to verify the presence of rare plants in proposed trail areas. First, a review of historical plant data and a site survey will be conducted by park natural resource staff. Secondly, a site survey, upon initial flagging of a proposed trail alignment, will be conducted to identify milkweed and rare plants or sensitive vegetative communities, where initial review identifies the presence of sensitive species. The survey will be conducted by park natural resource staff or contract professionals to identify conditions in a trail planning area with a 100% visual survey of the proposed alignment.
- Removing or impacting vegetation adjacent to trails will be minimized as much as possible to protect native plants and prevent the spread of nonnative species.
- The establishment of buffers based upon vegetation sensitivity will be conducted for each trail project, as conditions deem necessary, by the trail lead in coordination with the park natural resource staff.
- Areas under ecological restoration will be identified during initial trail planning to minimize disturbance to the restoration process.
- The goals of revegetation efforts will be to reconstruct the natural spacing, abundance, and diversity of native plant species in the trail corridor. The spread of invasive species will be reduced by using local ecotypes for native plantings and seeding.
- All crew members and volunteers assisting in the trail work efforts will be educated about the importance of avoiding impacts on sensitive resources that have been flagged for avoidance.
- Healthy trees of any size will not be removed, except where they interfere with trail traffic and/or the trail cannot be relocated to eliminate the interference. Healthy trees

over 12 inches diameter breast height will remain, and the trail will be routed to avoid being placed within the area directly under the outer circumference of the tree branches (i.e., the dripline). When branches extend over the trail, the corridor will follow the vertical trail clearance standards.

Vegetation – Invasive

- Construction equipment will be inspected and properly cleaned to remove dirt and debris that may harbor nonnative species before being delivered to the park.
- The spread of invasive vegetation that results from removal of and impacts to native vegetation will be monitored and treated.

Wildlife

- New and existing trails will avoid sensitive areas where a rare and/or endangered plant or animal species or its known habitat exist. Care will be taken not to disturb any other sensitive wildlife species (reptiles, migratory birds, raptors, and bats) found nesting, hibernating, estivating, or otherwise living in or immediately near the worksites. Park natural resource staff will be notified/consulted when wildlife must be disturbed or handled.
- A review of site conditions where sensitive habitats may exist within the trail planning area will be conducted with park natural resource staff or contract professionals and, if necessary, with the US Fish and Wildlife Service when deciding final trail alignments within the analyzed corridor. If conditions exist, buffers will be established, based on habitat sensitivity, where (1) trails are excluded, (2) temporary seasonal closures are required, or (3) limitations on seasonal construction are established. When resource conditions are within areas with multiple jurisdictions or require additional expertise, natural resources staff may request additional reviews of conditions with partner biologists. Additional consultation with the US Fish and Wildlife Service will be conducted as needed, as required by the Endangered Species Act for each final trail alignment during implementation. This additional consultation will occur to evaluate any additional potential impacts to any special status species and their habitat that were not already identified during the site-specific, corridor-level consultation.
- Trail building will avoid seasonal nesting areas, or the park will adhere to seasonal park policy, such as temporary closures, for trail use or tree clearing in specified areas.
- Vegetation and tree removal work will be sensitive to seasonality to avoid impacts to roosting, breeding, and nesting species to the maximum extent practicable.
- Implement dog-on-leash rules and use signage to keep users and dogs on trails to avoid disturbing wildlife.

Riparian and Aquatic Resources

- At new and improved river access sites, install interpretive signage to help prevent the spread of aquatic invasive species (i.e., boat cleaning prior to river entry).
- The riparian buffer zones or setbacks of trails adjacent to or crossing rivers and streams will be considered during site planning, including the buffer established by the Metropolitan River Protection Act (MRPA), which protects a 48-miles stretch of the Chattahoochee River between Buford Dam and Peachtree Creek. The trail location will be established outside of the established riparian function buffer zone whenever feasible.
- Trails will minimize river/stream crossings to avoid impacts to the stream. Where a crossing is necessary, evaluation of the stream quality and resource sensitivity will inform the design and location of the crossing. Where possible, stream crossings will be located at riffle areas instead of at pools or meanders, as riffles are relatively stable, have the coarsest substrate, and can best accommodate a crossing. All stream crossings will be evaluated in compliance with Director's Order 77: *Natural Resource Protection*.

Soils

- Following completion of construction activities, all areas of disturbed soils and vegetation will be regraded and revegetated as soon as possible. Natural topographic features will be restored to the extent possible using local excavated soils or from other park projects, and native species will be used in all revegetation efforts. Restoration efforts will be maximized by using salvaged topsoil (or clean fill) and native vegetation and by monitoring revegetation success for several growing seasons, as appropriate. Undesirable species will be monitored and control strategies initiated, if needed.
- Measures to control dust and erosion during construction could include the following: watering dry soils; using silt fences and sedimentation controls; stabilizing soils during and after construction with specially designed fabrics, certified straw, or other materials; and covering haul trucks.
- Analysis of trail corridors and has determined that there would be no potential for significant impacts to soil conditions within the park. However, soil conditions vary within the corridors, so consideration of local soil conditions (including soil type, susceptibility to erosion, drainage, and permeability characteristics) when determining the final layout of a trail during implementation is important to minimize impacts. The US Department of Agriculture Natural Resources Conservation Service soil survey information for Chattahoochee River National Recreation Area will be used as the primary reference. Additional on-the-ground site evaluation, as deemed necessary by the trail lead, will be conducted if survey information is not available or identified conditions are adverse to a sustainable trail. If and when adverse trail conditions are identified in the soil survey information for final trail alignments

within the trail corridor, the park will identify alternative options for trail design and its implementation, including aborting the trail (new or existing) or designing the trail with modifications that address adverse soil conditions.

Soundscape

- All trail construction activities will comply with NPS soundscape preservation and noise management requirements (i.e., Director's Order 47: *Soundscape Preservation and Noise Management* and NPS *Management Policies 2006*) to implement standard noise abatement measures during construction.

Air Quality

- Vehicles and equipment idling times will be limited when parked to reduce emissions.

Viewshed

- Viewing of distinct park features will be identified during site assessment and the feasibility for visitor access.

Wetlands

- Mitigation measures will be applied to protect wetland resources. Once a management strategy has been selected, a survey will be performed to certify wetlands within the project area and to identify locations of wetlands and open water habitat more accurately. Wetlands will be delineated by qualified NPS staff or certified wetland specialists and marked before any construction starts. All pathway construction facilities will be sited to avoid wetlands, or if that were not feasible, to otherwise comply with Executive Order 11990, "Protection of Wetlands," the Clean Water Act, and Director's Order 77-1: *Wetland Protection*. Additional mitigation measures will include the following, as appropriate:
 - Employ standard avoidance, minimization, and mitigation strategies.
 - Avoid wetlands during construction, using bridge crossings or retaining walls wherever possible. Increased caution will be exercised to protect these resources from damage caused by construction equipment, erosion, siltation, and other activities with the potential to affect wetlands. Measures will be taken to keep construction materials from escaping work areas, especially near streams or natural drainages.
 - Use elevated boardwalks over wetland sections where it is not feasible to avoid the wetland or apply feasible mitigation measures. Boardwalks along shorelines will be placed on helical piers or other elevated structures that can be periodically shifted toward the water to maintain the shoreline experience as isostatic rebound occurs.
 - Design footbridges in such a way as to completely span the channel and associated wetland habitat (i.e., no pilings, fill, or other support structures in the wetland/stream habitat). If footbridges could not be designed in such a way

as to avoid wetlands, then additional compliance (e.g., a wetland statement of findings) will be done to assess impacts to wetlands and ensure no net loss of wetland area.

- The design process will evaluate opportunities to improve wetland conditions and quality when trail elements are located adjacent or within a suspected wetland.
- Boardwalks, fences, signs, and similar measures will be used to route people away from sensitive resources, such as wetlands or riparian habitats or historic resources, while still permitting access to important viewpoints.
- Upon final design and if warranted, a formal delineation and any applicable Clean Water Act permitting will occur before groundbreaking.

Cultural Resources

- The park has executed a programmatic agreement in coordination with consulting parties, including the state historic preservation office and affiliated tribes, which describes historic identification actions as well as minimization and avoidance practices should it be determined that a proposed implementation action may impact a historic property (see attachment D).
- Before construction begins, the national recreation area will conduct an archeological survey along the potential route of any new trails to identify currently unknown and significant archeological resources so that they may be avoided. If the effects on resources could not be avoided or minimized within the trail corridors developed for this plan, further consultation with the state and tribal historic preservation offices and the Advisory Council on Historic Preservation according to 36 CFR 800 will be conducted, as necessary, to resolve an appropriate alternative.
- Should construction unearth previously undiscovered cultural resources, work will be stopped in the area of discovery, and the park will consult with the state and tribal historic preservation offices and the Advisory Council on Historic Preservation, as necessary, according to 36 CFR 800.13. In the unlikely event that human remains, funerary objects, sacred objects, or objects of cultural patrimony are discovered during construction, provisions outlined in the Native American Graves Protection and Repatriation Act (25 USC 3001) of 1990 will be followed.
- The park will consult with subject matter experts (cultural resource management team) about trails in close proximity to cultural resources.

Trail Development and Management

- Where trails are proposed in disturbed or previously developed areas of the park, considerations and verification of the following items will be included: presence of utilities, established right of ways, remaining structures, cultural or archeological significance, and presence of hazardous materials or contaminated conditions. If any

of these conditions exist on the proposed site, a determination of impact and trail alignment options will need to be developed to address the conditions present.

- Incorporate low-impact development and/or infiltration techniques into new construction or reconstruction of existing, impervious areas such as rain gardens, constructed wetlands, infiltration swales, or basins; grass (or vegetated) filter strips or swales, tree islands or planters, permeable pavement, and surface sand filters.
- All new trails and reroutes of existing trails will employ sustainable trail techniques and be constructed according to the design parameters outlined in the Chattahoochee River National Recreation Area Sustainable Trail Guidelines (see appendix F).
- In the event that resource thresholds are exceeded in a given area, the park will implement corrective measures to minimize resource impacts, which may include trail closures for periods of time, trail permit requirements, or other management actions.
- The National Park Service will audit and update compliance (e.g., under NEPA, section 7, section 106), if implementation necessitates that final trail alignments shift outside of the site specific trail corridors analyzed in the EA. Such actions will be conducted in a manner consistent with Director's Order 12: *Conservation Planning, Environmental Impact Analysis, and Decision-Making*, section 3.3(c).

FINDING OF NO SIGNIFICANT IMPACT

The National Park Service reviewed the environmental impacts described in the EA and determined that no significant direct, indirect, or cumulative impact will occur to any of the park's resources as a result of implementation of this plan.

As described in the EA, the selected alternative has the potential for adverse and beneficial impacts on park resources, including vegetation, wildlife (birds, denning mammals, herptiles), soils, wetlands, visitor use and experience, and archeological resources. No significant adverse impacts were identified.

Vegetation

Construction and operation of the trail system will result in direct, short- and long-term adverse impacts on vegetation from the removal of forest, shrub grass, and other land cover and from the potential spread of nonnative invasive species. Up to 66 acres of forest, 0.5 acres of marsh, 1.9 acres of shrub grass, and 0.9 acres of other land cover will be removed during construction. However, 6.4 acres of this total vegetation will be restored to natural conditions through trail closures, resulting in a net removal of as much as 62.6 acres of vegetation. Overall, the removal of vegetation will account for the small percentage of up to 1.3% total impact to vegetation within the park. Mitigation measures outlined previously and in chapter 2 and the trail construction guidelines in appendix F of the trail management plan will ensure that areas are surveyed prior to ground disturbance to ensure that final trail alignment avoids areas with high-quality vegetation, highly diverse vegetation, and healthy trees.

The selected alternative will have long-term, adverse impacts on vegetation, but the National Park Service has determined that the impacts will not be significant because:

- Mitigation measures will be implemented to avoid disturbance to sensitive plant species as well as ecologically sensitive areas.
- Species composition in the project area will not change.
- Mitigation measures will be implemented to monitor and control nonnative invasive plants.

Wildlife – Birds, Denning Mammals, and Herptiles

As discussed previously in the “Vegetation” section, the selected alternative will result in the removal of vegetation, which will contribute to permanent habitat alteration. The additional trails in the trail system will fragment habitat and create edges that may cause changes in bird, denning mammals, and herptile communities. As a result of the action alternative, current habitat classified as “very good habitat” will be reduced by one block (525 acres), “good habitat” will decrease by three blocks (3 acres), “fair habitat” will decrease by two blocks (16 acres), and “poor habitat” will decrease by two blocks (no change to acreage). Habitat health was quantified by assessing fragmentation of forested blocks using spatial analysis. Forested blocks were selected as a reference because most wildlife species at Chattahoochee River NRA inhabit forested areas. Fragmentation is defined as forested blocks that are subdivided by either existing trails and/or roads, where a 328-foot (100-meter) buffer was used on each side of trails and roads.

The increased trail network habitat fragmentation may result in displacement, avoidance, and effects from human disturbance on bird species and increase the chance of predation on bird nests. The increased trail network habitat fragmentation may also result in opportunities for structurally complex habitat through canopy gaps. The positive effect of increased canopy gaps outweighs the negative impacts of habitat fragmentation.

The increased trail network habitat fragmentation may result in displacement of dens used by mammals and denning mammal avoidance. Foxes may be sensitive to changes such as trail alterations and the introduction of visitors near dens. Increased fox predation is also possible due to habitat disturbance. Mitigation efforts will avoid disturbances to wildlife habitat, as outlined earlier and in chapter 2 of the trail management plan.

The increased trail network habitat fragmentation may also result in reduced patch size, increased patch isolation, and increased risk of extinction of herptiles. The use of helical piers (see the “Wetlands” section) will reduce the impact to herptiles in wetlands. Amphibians will be minimally impacted by new trails and will be expected to continue crossing new trails after trail construction. Toads will be minimally affected by trail development and trail presence and will be minimally affected by the increased trail network fragmentation. The use of natural surface trails will minimize impacts to amphibians during breeding season migrations. Reptiles will be affected by the size of their habitat but will be more affected by the quality of their habitat. The negative impacts to both reptiles and amphibians will be reduced through the ongoing monitoring of trail condition and social

trailing, as outlined in appendix D of the trail management plan. Mitigation efforts will maintain high-quality habitat and monitoring protocols, as outlined earlier and in chapter 2 and appendix D of the trail management plan. High-quality habitat will continue to exist throughout the park to support herptiles outside of the project area.

Construction activities may alter wildlife use of the area in the short term due to noise, but animals may return to the area after construction. Newly developed areas will be located on the edge of forest blocks in previously disturbed areas of the park, with negligible impacts to wildlife. The increase of 10.3 miles of multiuse trails allowing biking may contribute to increased disturbance to wildlife, although this disturbance is not anticipated to be greater than the disturbance to wildlife caused by hikers. The restoration of 19.6 miles of trails to natural conditions will beneficially impact wildlife by reducing fragmentation and wildlife disturbance.

The National Park Service has completed consultation with the US Fish and Wildlife Service pursuant to section 7 of the Endangered Species Act. On April 1, 2022, the National Park Service submitted a consultation letter to the US Fish and Wildlife Service and requested concurrence on findings of “may affect, not likely to adversely affect” for the monarch butterfly. In a letter dated April 20, 2022, the US Fish and Wildlife Service concurred with the park’s findings of not likely to adversely affect for this species.

The selected alternative will have short- and long-term, adverse impacts on wildlife, but the National Park Service has determined that the impacts will not be significant because:

- The project is not likely to adversely affect species listed under the Endangered Species Act and will have no effect on critical habitat designated under the Endangered Species Act.
- Vegetation and tree removal work will be sensitive to seasonality to avoid impacts to roosting, breeding, and nesting species to the maximum extent practicable. Healthy trees over 12 inches diameter breast height will remain, and the trail will be routed to avoid being placed within the area directly under the outer circumference of the tree branches (i.e., the dripline).
- The project is not expected to result in bird population-level impacts or changes in the composition of bird species using the project area.
- No population-level effects or changes to species composition in the project area are expected.
- The selected alternative “may affect, not likely to adversely affect” the Monarch butterfly (*Danusa plexippus*) as a candidate species. Park staff will conduct site surveys prior to ground disturbance and confirm the location of swamp milkweed (*Asclepias incarnata*) or other critical habitat for this species. If any species of milkweed are identified in the survey, park staff would implement the mitigation measures outlined in chapter 2 of the plan, including minor reroutes within the analyzed corridors to avoid any critical habitat.

Soils

Construction of the trail system will disturb up to 69 acres of soil and closing official trails will restore approximately 6.4 acres of soil. The net disturbance of up to 62.6 acres of soil will cause displacement, compaction, and erosion. Construction of the trail system will result in a shift of 7% of total trails from unsustainable to sustainable, as defined in chapter 3 of the trail management plan. Biking will be allowed on an additional 10.3 miles, which may contribute to increased soil erosion. Implementing design standards outlined in appendix F for multiuse trails will mitigate the risks of increased soil erosion due to biking. Recreational use of the trails will cause continued adverse soil impacts, including loss of organic litter and soil compaction, rutting, and erosion. Trail widening or braiding or development of visitor-created trails may result in soil compaction and erosion on either side of new trails. However, park staff will continue to periodically monitor trail condition and social trails, as outlined in appendix D of the trail management plan. Topography of new trails will be more sustainably aligned, and soil erosion will therefore be less on new trails than on existing trails. Adverse impacts of soil erosion due to new trail construction will be lessened due to the topographic alignment of the new trails. Mitigation measures outlined earlier and in chapter 2 and trail construction guidelines in appendix F of the trail management plan will reduce impacts to soils. The impacts will be even less noticeable parkwide, since at least 4,638 acres of soils will be unaffected. Overall, the disturbances to soils will account for the small percentage of up to 1.3% total impact to soil within the park. Therefore, the actions proposed under the action alternative will not be expected to impact the long-term viability of soils in the park.

The selected alternative will have long-term, adverse impacts on soils, but the National Park Service has determined that the impacts will not be significant because:

- Direct, short- and long-term, adverse impacts will affect only 1.3% of all soils in the park.
- Trail sustainability associated soil erosion will improve by 7% in the newly designed trail system.
- Impacts will be on commonly occurring soils throughout the park.
- Mitigation measures, including the use of sustainable design concepts and sediment and erosion control measures, will effectively minimize potential impacts.

Wetlands

Construction of new trails and facilities will primarily occur on well-drained soils. All attempts will be made to avoid or minimize impacts to wetlands. If alternatives to non-wetland sites cannot be located, then additional compliance (e.g., a wetlands statement of findings) will be done to assess impacts to wetlands and ensure no net loss of wetland area. Wetlands will be minimally impacted through the placement of boardwalks with helical piers. New trail construction or social trail adoption will cross through approximately 1.8 miles of wetlands. The use of helical piers to support the boardwalks will affect approximately 0.06 acres, impacting 0.04% of the park's total wetlands. The total surface area of the boardwalk will shade approximately 2.5 acres of wetlands, impacting 1.6% of the park's

total wetlands. Trail restoration will account for approximately 1 acre, or 0.7% of the park's total wetlands, returning the trails to natural conditions. When accounting for restoration, the total net impact to wetlands will be 1.5 acres, impacting 1% of the park's total wetlands. While restoration will positively impact wetland health in the long term, restoration may result in short-term adverse impacts to the wetlands. Mitigation measures and best management practices would be implemented during trail restoration to reduce the adverse impacts of restoring wetlands. Boardwalk construction will result in a loss of wetland biotic function due to vegetation removal for the boardwalk's helical piers. In addition, some continual adverse impacts to vegetation may result from shading caused by the boardwalks. Removal of trees of substantial size would be avoided to the extent possible to avoid impacts to natural resources. Biking will be allowed on an additional 10.3 miles, and impacts on wetlands from bikes will decrease due to implementing design standards outlined in appendix F of the trail management plan. Approximately 150 acres of wetlands within the park, accounting for 98.4% of total wetlands, would remain undisturbed. Remaining adjacent wetlands will continue to filter and convey precipitation and provide an important complex of habitats. The long-term viability of park wetlands will not be impacted.

The selected alternative will have long-term, adverse impacts on wetlands waters, but the National Park Service has determined that the impacts will not be significant because:

- Trail alignments will minimize impacts to wetlands when feasible.
- Boardwalks with helical piers will be used to minimize impacts to wetlands. The total impact accounts for only 1% of the park's total wetlands.
- Mitigation measures, including surveying, conducting delineations, avoiding wetlands in final trail alignment when possible, and complying with Director's Order 77-1, will result in no net loss of function to wetlands.

Visitor Use and Experience

Constructing and operating the trail system will result in both adverse and beneficial impacts on visitor use and experience. Approximately 32 miles of trails will be added to the trail system—a 48% increase in trail miles with more opportunities for hiking, running, dog walking, and other recreational pursuits. The overall beneficial impact to visitor access to trail-based recreational opportunities will be spread across the vast area of the park. Many of these new trails will provide access to destinations and experiences not included in the current trail system, beneficially impacting visitor use and experience in the long term. The quality of the experience will be improved by the shifts in alignments from wide-open utility corridors and relict roadbeds to purpose-built, generally single track, natural surface trails along contours. Bikers will gain access to another 10.3 miles of multiuse trail across the system, while horseback riders will have 3.2 miles of trail use removed. Visitor wayfinding and circulation will be greatly improved. Portions of the potential regional greenway will add another 11.7 miles of opportunities for visitors to connect with areas across park boundaries. Architectural Barriers Act standards will be followed to improve trail accessibility. Some trail-based experiences, opportunities, and destinations will be permanently lost from the trail system due to restoring existing trails to natural conditions and removing unauthorized

trail accesses. User conflict between hikers and bikers will be monitored, as per appendix D of the trail management plan. The overall adverse impact of these isolated lost experiences, access points, and opportunities would be outweighed in the long term by the substantial overall increase in designated trail mileage and formalizing the trail system and trail access.

The selected alternative will result in long-term, beneficial impacts on visitors who desire a purpose-built trail system. Adverse impacts described previously will be short term, affect a small number of visitors, and be insignificant.

Archeological and Historic Resources

New trail and facilities construction will occur in the vicinity of known archeological resources and historic properties. Ground disturbance and the potential removal of sensitive artifacts from the field may negatively impact archeological resources. Closing trails in archeologically sensitive areas will have long-term benefits by reducing visitor access to these resources. A programmatic agreement for ongoing execution of compliance with sections 110 and 106 of the National Historic Preservation Act is provided in attachment D of this document. The agreement was developed in coordination with affiliated tribes and the Georgia State Historic Preservation Office. The programmatic agreement provides a process to complete appropriate archeological surveys and National Register of Historic Places eligibility determinations prior to implementation of individual trail projects that make up the preferred alternative. The programmatic agreement mitigates impacts of data uncertainties (i.e., limited surveying, geospatial inaccuracies of mapped resources) by requiring that survey and analysis will occur before individual trail construction or restoration projects. The agreement also provides for minimizations or avoidance procedures for historic properties. Under the selected alternative, the execution of the programmatic agreement will ensure that the section 106 compliance process will minimize or avoid any impact to archeological resources during the implementation of the trails plan.

The selected alternative will avoid long-term, adverse impacts on archeological resources, and these impacts will not be significant because of the execution of the programmatic agreement developed in cooperation with the state historic preservation office and affiliated tribes.

AGENCY AND TRIBAL CONSULTATION

The National Park Service sent a letter to the Georgia State Historic Preservation Office on March 26, 2021, to initiate section 106 compliance for the plan. The trails management plan was discussed during the statewide biennial meeting on May 6, 2021, to meet the requirements of the NPS Nationwide Programmatic Agreement. The park has executed a project-specific programmatic agreement in coordination with consulting parties, including the state historic preservation office and affiliated tribes, which describes historic identification actions as well as minimization and avoidance practices should it be determined that a proposed implementation action may impact a historic property (see attachment D). The project-specific programmatic agreement has been signed by the state historic preservation office, the Muscogee (Creek) Nation, and the National Park Service

and satisfies the requirements of section 106 of the National Historic Preservation Act (NHPA).

The National Park Service sent letters to initiate section 106 compliance for the plan on March 26, 2021, to the Absentee Shawnee Tribe, Alabama-Coushatta Tribe of Texas, Alabama-Quassarte Tribal Town, Cherokee Nation, Coushatta Tribe of Louisiana, Eastern Band of Cherokee Indians, Kialegee Tribal Town, Muscogee (Creek) Nation, Poarch Band of Creek Indians, Seminole Nation of Oklahoma, Seminole Tribe of Florida, Shawnee Tribe, Thlopthlocco Tribal Town, and United Keetoowah Band of Cherokee Indians of Oklahoma. The park discussed the trails management plan on March 1, 2022, during a meet-and-greet meeting with the new superintendent and park staff. The Muscogee Nation and the Eastern Band of Cherokee Indians are invited signatories on the programmatic agreement. The Cherokee Nation and the Shawnee Tribe responded that they will consult with standard section 106 consultation and not sign the agreement document. No other tribal responses were received.

The Advisory Council on Historic Preservation was notified on April 28, 2022, of the development of a programmatic agreement. The council chose not to participate as a consulting party on the programmatic agreement, signed December 8, 2022.

As noted in the “Wildlife” section, the National Park Service completed consultation with the US Fish and Wildlife Service pursuant to section 7 of the Endangered Species Act. On April 1, 2022, the National Park Service submitted a consultation letter to US Fish and Wildlife Service and requested concurrence on findings of “not likely to adversely affect” for the monarch butterfly. In a letter dated April 20, 2022, the US Fish and Wildlife Service concurred with the park’s findings of “may affect but is not likely to adversely affect” for this species.

The National Park Service informally consulted with the Georgia Department of Natural Resources (GADNR) throughout the planning process. National Park Service staff included GADNR representatives on distribution lists related to public comment periods for the various drafts of the plan (and resulting public comment summary documents). On January 12, 2022, the National Park Service submitted a letter to the department and requested a list of all state-listed animal and native plant species that might occur in and around the park. In a letter dated February 12, 2022, the Georgia Department of Natural Resources provided the list of all state-listed animal and native plant species that might occur in and around the park.

The National Park Service informally consulted with the US Army Corps of Engineers (USACE), who is an operational partner to the park, throughout the planning process. National Park Service staff included USACE representatives on a distribution list related to public comment periods for the various drafts of the plan (and resulting public comment summary documents). Park staff also presented the trails plan at a river stakeholder gathering hosted by the City of Roswell, which included the USACE Lanier operations project manager.

CONCLUSION

As described in this document, the selected alternative does not constitute an action meeting, the criterion that normally requires the preparation of an environmental impact statement. The selected alternative will not have a significant effect on the human environment in accordance with section 102(2)(c) of the National Environmental Protection Act.

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

ATTACHMENT A: PUBLIC COMMENT RESPONSE REPORT

INTRODUCTION

Chattahoochee River National Recreation Area (the park) initiated a 32-day public comment period for the *Comprehensive Trails Management Plan/Environmental Assessment* (plan/EA) on April 1, 2022, and the public was invited and encouraged to provide feedback on the document. The public's feedback during this public comment period was reviewed and analyzed for themes and substantive comments. The National Park Service developed responses to substantive comments as well as non-substantive comments.

PUBLIC OUTREACH DURING THE COMMENT PERIOD

The National Park Service issued a media release on April 1, 2022, announcing the availability of the plan/EA for public review and comment. The media release was distributed widely to 362 media members, nonprofit organizations, private individuals, and other interested stakeholders to notify them of the opportunity to comment. The National Park Service also posted on the park's social media platforms to notify approximately 15,000 followers of the opportunity for review and comment. The National Park Service posted the document for review and comment on the NPS Planning, Environment, and Public Comment (PEPC) website (https://parkplanning.nps.gov/CRNRA_Trails). The public was encouraged to submit comments through this website, though comments were also accepted by US mail.

During the public comment period, the National Park Service conducted four targeted engagement sessions with key stakeholder groups. On April 4, park staff presented an overview of the final draft plan/EA to the board of the Chattahoochee National Park Conservancy, along with some of their project partners and major donors. Twenty-three individuals attended the presentation. On April 6, park staff presented an overview of the final draft plan/EA to stakeholders from the Chattahoochee RiverLands community, which was attended by 12 individuals. Staff presented the final draft plan/EA at the monthly park Volunteers in Parks meeting on April 14, which was attended by approximately 40 individuals. Lastly, staff presented on April 27 at the monthly Chattahoochee RiverLands Working Group meeting, which was attended by 46 individuals. During each of these presentations, park managers reminded attendees that they needed to formally submit comments to the National Park Service through the PEPC website in order for their suggestions to be considered during the comment period.

CORRESPONDENCES RECEIVED

During the public comment period, the National Park Service received 91 unique correspondences. All but two of these were from Georgia, with one each from Tennessee and Utah.

DEFINITION OF TERMS

Key terms used in this Public Comment Response Report are defined below.

Correspondence: A correspondence is the entire document received from a commenter and includes comments entered directly into the PEPC website and letters by US mail.

Comment: A comment is a portion of the text within a correspondence that addresses a single subject or idea. The comment could include such information as an expression of support or opposition for an alternative, additional data regarding the existing condition, or suggestions for resource topics to be considered.

Substantive Comment: These comments

- question, with reasonable basis, the accuracy of the information in the NEPA document;
- question, with reasonable basis, the adequacy of the environmental analysis;
- present reasonable alternatives other than those presented in the NEPA document; or
- cause changes or revisions in the proposal.

In other words, substantive comments raise, debate, or question a point of fact or analysis. Comments that merely support or oppose a proposal or that merely agree or disagree with NPS policy are not considered substantive and do not require a formal NPS response.

Concern: Concerns are statements developed by the National Park Service that summarize a theme or idea represented in one or more comments. Concerns may be substantive or non-substantive.

COMMENT ANALYSIS METHODOLOGY

Most correspondences provided by the public were entered directly into the PEPC system. National Park Service staff entered correspondences received by mail into the PEPC system for analysis.

Once all correspondences were entered into the PEPC system, each was reviewed and specific comments within each unique correspondence were identified. These comments were initially sorted into two groups—substantive comments and non-substantive comments. Per regulation, the National Park Service must consider all comments that are timely received, and the standard NPS practice is to respond to substantive comments that are submitted during the public review period for environmental assessments.

However, NPS staff recognized that many of the non-substantive comments warranted a response due to the frequency the comment was represented in the correspondences or the importance of the comment to the plan and park management. Therefore, the National Park Service took the additional step of developing concern statements to summarize both the substantive and the non-substantive comments.

National Park Service responses describe the NPS position on the concern statement, and as necessary, describe other actions the National Park Service took to respond to the comment, which could include making factual corrections in the plan/EA; supplementing, improving, or modifying the analysis; and modifying the preferred alternative. Responses were developed for both substantive and non-substantive concern statements.

SUBSTANTIVE COMMENTS AND NPS RESPONSES

The substantive comments received during the public comment period are summarized in concern statements below, along with the NPS responses to the concern statement.

Adequacy of Range of Alternatives

Concern: A commenter expressed concern that the National Park Service only evaluated two alternatives, an action alternative and the preferred alternative. The commenter was concerned this was an inadequate range of alternatives to fully assess the impacts of the trails and left the National Park Service with limited “choices,” essentially creating an “all or nothing” proposal.

NPS Response: Thank you for this comment, which questions the adequacy of the environmental analysis. Per the NPS NEPA Handbook (2015), “the term ‘range of alternatives’ refers to the set of all reasonable alternatives as well as other alternatives considered but eliminated from detailed analysis. The range of alternatives will vary based on the complexity of the proposal and extent of related environmental issues.”

As part of the planning process, the National Park Service evaluated many possible trail alignments not included in the preferred alternative. These alternatives were dismissed from further consideration due to impacts to resources, cost, relative desirability of the alignment from a visitor experience perspective, sustainability, and other factors. Only the trails that best met the purpose and need for the plan were retained in the preferred alternative. In this way, the National Park Service evaluated a wide range of alternative trails.

This EA contains compliance for site-specific trail corridors within Chattahoochee River National Recreation Area. The new proposed trail alignments were determined at the corridor level, defined as a 60-foot-wide corridor within which the new trail will be constructed. Final trail alignments will be determined on the ground upon implementation and in consultation with park natural and cultural resources specialists, which could result in minor adjustments to the trail locations shown on the maps. If a need exists to align a trail outside of the identified corridor, the amended alignment will undergo additional review (and associated compliance, as needed) to avoid or minimize impacts to sensitive resources, and the change would be documented as an amendment to the trails management plan.

Mapping Errors

Concern: Commenters noted the following map errors shown in appendixes A and B: Big Creek in the Vickery Creek unit is shown in the wrong location; an overlook shown in East

Palisades between markers EP-6 and EP-8 is a natural overlook but is not the official observation deck, which is further upriver between EP-10 and EP-14; and the boat ramp at Bowmans Island is not on NPS-managed land as shown on the map, but rather on land managed by the US Army Corps of Engineers at the Lower Pool West parking area.

NPS Response: Thank you for these comments, which led to revisions to the plan using an errata to make editorial changes. These cartographic errors have been corrected and identified in the errata attached to the FONSI. During this process, several other cartographic errors were discovered and have been corrected. The corrections are provided in a table in the errata section.

Neighboring Developments

Concern: A commenter suggested that the National Park Service could improve access to the bamboo forest in the Palisades unit, a popular visitor destination, by developing an additional trailhead on NPS property along Riverview Road. The commenter suggested constructing a permeable surface parking lot on the NPS-owned lot containing an old house at the bend in Riverview Road and adopting one of the existing social trails that accesses the bamboo forest from this location. The commenter suggested that this would help spread out use while alleviating issues with unauthorized roadside parking on the narrow Riverside Road.

NPS Response: Thank you for sharing this reasonable alternative. While it is not presented in the plan, NPS staff did consider including this strategy during the development of the plan. Ultimately, the strategy was not included in the plan due to the cost of this development and the short distance between the potential parking area and the bamboo forest. Providing this short, easy access to the bamboo forest would likely attract many more visitors to this area, which would conflict with desired conditions that describe “opportunities to connect with nature and experience solitude in relative peace and quiet” and the plan’s strategy of designating the bamboo forest as a “quiet area to provide a unique visitor experience.”

Concern: Several commenters requested that the National Park Service address potential issues with unauthorized parking along Riverview Road in the northeast corner of the Palisades unit. Commenters noted that there is a primary trail access shown along this road and that this is the closest access point to the popular bamboo forest destination. Commenters expressed concern that this access would exacerbate ongoing issues related to unauthorized public parking along the narrow road and requested that a “no public parking” designation be added to Riverview Road on plan maps.

NPS Response: Thank you for this comment, which led to a revision to the plan. In response to this comment, a “no public parking” designation has been added to the plan maps showing this area. The primary trail access point is included in the plan to focus pedestrian access (those arriving to the primary access by foot rather than by car) and use of this area on a sustainable trail alignment. Demand for access in this area is high due to the presence of the bamboo forest, and therefore, removing all public access is infeasible. Instead, the plan’s strategy is to focus that use on a designated trail. Enforcement of any parking along Riverview Road is outside of NPS

jurisdiction. The National Park Service will also monitor visitor use levels in the Palisades (East) unit and employ adaptive management strategies to ensure that the unit does not exceed its designated visitor capacity (see appendix E).

Concern: Several commenters noted the “fishing access” icon shown in the southern portion of the Orrs Ferry unit. Commenters expressed concern that this icon may inadvertently encourage access through private lands that are part of the Wild Timbers Homeowner Association, since this access would be closer than the designated trailhead at Highway 20. Commenters also noted that this icon is not used throughout the plan but is only denoted at Orrs Ferry and Bowmans Island.

NPS Response: Fishing access is an intended aspect of the new trail system proposed in Orrs Ferry and Bowmans Island. Park staff surveyed the Orrs Ferry unit in July 2021 and observed over 20 unofficial angler access points. By formalizing fishing access points along the trail, additional social trailing will be discouraged, and impacts to the riverbank will be mitigated. The park will work with neighboring communities to promote appropriate public access and potentially designate secondary access points if desired by local residents.

Staffing, Operations, and Costs

Concern: A commenter pointed out that the “Staffing and Cost Estimates” section of the plan states, “One-time costs for (the greenway and the improved/additional Type 2 multiuse trails in Cochran Shoals) projects will not be borne by the National Park Service and are presented separately in table 6.” However, the costs not to be borne by the National Park Service are not clearly identified in table 6.

NPS Response: Thank you for this comment, which led to a revision to the plan. Table 6 has been revised to specifically identify “one-time costs” as expenses that would be primarily sourced in partner-provided funding over the life of the plan.

Concern: A commenter noted that text in the plan’s “Staffing and Cost Estimates” section in chapter 2 is inaccurate. The current text states that the Chattahoochee National Park Conservancy and others have invested about \$150,000 in the park’s trail system to date. The commenter states that this is an underestimate and that more funds have been provided to improve the trails and associated facilities. The commenter notes that specific work on the Vickery Creek staircase, Jones Bridge Overlook, Cochran Shoals Overlooks, Kids Fishing Dock at Island Ford, and more are excluded from this estimate. The commenter recommends correcting this information.

NPS Response: Thank you for this comment, which questions the accuracy of the information presented in the NEPA document. The document has been updated to reflect a total of “more than \$475,000” invested in the trail system over the last five years.

Vegetation Analysis

Concern: One commenter questioned the potential impact to vegetation (as described in chapter 3) and asked if it was an overestimation, incorporated the offset from closing existing trails, and incorporated how the new trails reduce trail widening and social trails.

NPS Response: Thank you for this comment, which questions the accuracy of this information included in the document. The vegetation analysis in chapter 3 provides a maximum possible impact to vegetation. In some areas, the maximum trail width and maximum horizontal clearing will be necessary, and in other areas, the minimum trail width and minimum horizontal clearing will be sufficient. The analysis in chapter 3 accounts for closing (i.e., restoring) existing trails, and it also accounts for social trails and trail widening. Edits are included to clarify the analysis methodology in Attachment C: Errata.

Visitor Use Management

Concern: A commenter pointed out conflicting statements about potential room for growth at Johnson Ferry South in the visitor capacity appendix. The “Visitor Capacity” section of the Johnson Ferry South analysis states that there is room for growth in visitation to the unit, but the “Management Strategies” section states that ample room for growth does not exist in the unit. The commenter requested clarification.

NPS Response: Thank you for this comment, which led to a revision to the plan. This text was an editorial mistake. Johnson Ferry South does have ample room for growth in visitation. The “not” has been deleted from the “Management Strategies” section in the final version of the plan.

Water Quality Analysis

Concern: Multiple commenters advocated for the inclusion of water quality as an impact topic to be analyzed. Commenters were concerned about stream buffer encroachment, increases in river access, and erosion during and after trail construction in riparian areas at proposed trails near the river or its tributaries. Commenters were also concerned that more trails would result in an increase in dogs on trails without proper waste disposal, and a subsequent increase in *E. coli* pollution in the river. Commenters also urged the use of green infrastructure where new development would occur to accommodate new facilities. Commenters also questioned what types of erosion control methods would be used to minimize the amount of sediment that reaches the river and its tributaries. Commenters asked about the Chattahoochee River Streambank Stabilization Plan guidance.

NPS Response: The corridor-level trail alignments, as described in the “Final Alignments for Trails” section of chapter 2, will consider the riparian buffer zones, as described in the “Wetlands Mitigations” section of chapter 2. All trail construction, including adopted social trails and new construction, will adhere to the physical sustainability measures described in chapter 2. By formalizing river access using the physical sustainability measures, visitors will stay on trails designed with erosion control in mind instead of using visitor-created trails that do not follow sustainable

alignments. Erosion during and after construction will be short term and will adhere to mitigation measures outlined in the “Natural Resources Mitigations” section of chapter 2. Soil conditions will be considered when determining the final layout of a trail, as described in the “Natural Resources Mitigations” section of chapter 2. Concerns about soil erosion are addressed in chapter 3 of the plan. Erosion will also be monitored through relevant indicators and thresholds, as described in appendix D of the trails plan. Regarding dog waste, dog waste stations will be included at new sign installations (“Signage and Trail Markers” section of chapter 2 of the trails plan), the dog waste disposal partnership campaign “Bag and Bin it” will be expanded (“Visitor Use and Experience” section of chapter 3 of the trails plan), educational signage for proper dog behavior will be increased (“Visitor Capacity Management Strategies” section of appendix B of the trails plan), and conflicts with dogs (including improper dog waste disposal) will be monitored as per its indicator and threshold (appendix D of the trail management plan). The implementation of green infrastructure is described in the “Natural Resources Mitigations” section of chapter 2 of the trails plan. The Chattahoochee River Streambank Stabilization Plan referred to is the Georgia Department of Natural Resources Chattahoochee River Streambank and Shoreline Stabilization guidebook. Additional mitigation measures to protect water quality are included in Attachment C: Errata.

Wetlands

Concern: One commenter suggested moving trail alignments outside of the wetlands.

NPS Response: Trail alignment through wetlands has been mitigated to the extent possible. Where necessary, trails will pass through wetlands to provide necessary connections to nearby trails. When trails are in wetlands, the use of boardwalks on helical piers will largely mitigate the impacts to the important wetland resource.

Wildlife Analysis

Concern: One commenter questioned the habitat tract analysis presented in the current conditions (table 8) and action alternative conditions (table 9) in the wildlife impact topic, acknowledging a decrease in approximately 500 acres between the current conditions and action alternative.

NPS Response: Thank you for this comment, which questions the accuracy of the information included in the document. The wildlife analysis in chapter 3 provides a maximum possible impact to the wildlife species listed. Chapter 3 defines fragmentation and the 328-foot (100-meter) buffer methodology for the spatial analysis. The difference of approximately 544 acres between the existing conditions and the action alternative conditions is due to the addition of 32.4 miles of new trails with 328-foot (100-meter) buffer on each side, resulting in added trail overlap and causing the subsequent reduction of total forested tracts. In addition, social trails are widespread throughout the park and were not included in the existing conditions because they are not formally recognized as trails. Had the existing social trails been

included in the existing conditions spatial analysis, the difference between the existing conditions and the action alternative conditions would be much smaller.

Design or New Alternative Suggestions:

Concern: Multiple commenters would like the Type 4 Aggregate Multiuse Trails (including the Abbotts Bridge Greenway Pilot Project) to be 10–12 feet in width and paved as a hard surface pervious trail (such as porous asphalt, porous concrete, or porous rubber).

Commenters noted that connecting greenways and roadside trails in the area are or will be paved and wider than the 8–10 ft width described in appendix F. Some commenters claim that a minimum of 12 feet width is necessary for safe multidirectional travel, and a paved pervious trail would hold up long term and be easier to maintain.

NPS Response: The allowable trail width for type 4 trails as identified in appendix F of the trails plan meets standard industry and professional recommendations for multiuse bicycle and pedestrian trails (e.g., Georgia Department of Transportation guidelines). By selecting crushed aggregate as the type 4 trail surface material, park managers intend to create a unique visitor experience on NPS multiuse trails that is distinct from nearby paved regional trails. The cyclic maintenance associated with crushed aggregate is relatively low, and other design features, such as trail curbing/edging, will help extend the longevity of the trail surface and prevent “trail creep” beyond the designated trail corridor.

Concern: Some commenters requested that the park consider developing a pedestrian bridge to connect West and East Palisades to improve access to these units.

NPS Response: In chapter 2, the “Alternative 2: Unit-Specific Descriptions” section that describes actions at the Palisades unit, the plan states that “In the future, connectivity between east and west Palisades could be considered via a pedestrian river crossing.”

NON-SUBSTANTIVE COMMENTS AND NPS RESPONSES

Many of the non-substantive comments received during the public comment period are summarized in concern statements below, along with the NPS responses to the concern statement. These non-substantive comments and responses are included at NPS discretion, as it is not a requirement under the National Environmental Protection Act.

General Management Plan Zoning

Concern: A commenter expressed concern that the Comprehensive Trail Management Plan diverges from the park’s 2009 general management plan (GMP) regarding zoning; desired conditions; appropriate activities, facilities, and services for the zones; and related issues. The commenter was unclear as to whether the park had the ability to diverge from prescriptions included in the general management plan.

NPS Response: The Comprehensive Trail Management Plan is part of Chattahoochee River National Recreation Area’s planning portfolio. Together, all the documents in a

park's planning portfolio comprise the park management philosophy and create a logical, trackable guide for future park management actions. As substantial new issues or significant changes arise, the National Park Service may amend general management plans. This plan serves as an amendment to the 2009 general management plan. Changes to GMP zoning, and therefore the high-level desired conditions descriptions and appropriate activities, facilities, and services, are described in chapter 2 under the "Alternative 2: Unit-Specific Descriptions" section. For more information on the relationship between the general management plan and the trails plan, see the "Planning Context: Relationships to Other Park Plans" section of chapter 1 as well as NPS Director's Order 2: *Park Planning*.

Concern: A few commenters expressed opposition to specific zoning amendments described in the plan. Commenters specifically identified the Vickery Creek unit's change from Rustic to Natural Area Recreation Zone, and Island Ford's change from Rustic to Natural Area Recreation Zone. Commenters proposed alternatives that would segment these units into different zones. One commenter clarified that their concern about the zoning changes stemmed from a concern over the potential expansion of areas where bicycle use is allowed on trails.

NPS Response: The rationale for changes to zoning are described for each unit that has such a change in chapter 2 under the "Alternative 2: Unit-Specific Descriptions" section. For Vickery Creek, the rationale notes that "Park management over the last several decades has actively managed this unit as one of the park's most popular areas. Zoning this unit as Rustic is inconsistent with this management, which current leadership intends to sustain given the unit's proximity to downtown Roswell and being well positioned for relatively high levels of visitation. This unit benefits from multiple trailheads and primary access points that facilitate safer access to the extensive trail system." A similar rationale is provided for Island Ford.

The proposals to further segment the units into multiple zones is contrary to best management practices to avoid creating small zones that create a zoning scheme more nuanced than what managers can realistically manage.

Under the plan, bicycles would be allowed on designated multiuse trails in Cochran Shoals, on the future regional greenway, and on existing multiuse trails in Vickery Creek (Roswell Riverwalk) and Palisades (Rottenwood Creek/Bob Callan Trail). The plan, which will guide trail management for the foreseeable future, does not call for any expansion of bicycling opportunities in the Vickery Creek and Island Ford units.

Visitor Use Management Elements

Concern: A commenter expressed concern about how the triggers and thresholds for the "Visitor Conflicts" indicators would be identified. The commenter was concerned that the triggers and thresholds would be identified based on a rolling 12-month average, which would allow for a steady increase in conflicts over time without exceeding triggers or thresholds. The commenter suggested a fixed trigger and threshold that would not change over time instead.

NPS Response: As described in the “Monitoring Strategy” section of the “number of visitor complaints for bicycle/pedestrian conflicts” indicator, “Staff would initially monitor visitor complaints for 12 months to establish a baseline average (i.e., the average number of complaints received per month over that year). After this initial data gathering period, staff would compare new visitor complaints each month relative to the baseline monthly average.” This means that the triggers and thresholds would be identified as fixed levels, 15% and 25%, respectively, above the average level reported during the initial 12-month data gathering period. This “baseline condition” is fixed at a yet-to-be determined level; it will not be rolling 12-month average.

Concern: A commenter suggested that the park should establish or improve the advertisement of an official method for visitors to file complaints of conflicts or other undesirable activity occurring in the park.

NPS Response: As described in the “Rationale” section of the “Visitor Conflicts” indicators, “staff plan to maintain a log of all visitor complaints received.” Currently, park visitors report conflicts to staff and volunteers patrolling trails, write to the park superintendent, or provide feedback by email or social media. To improve consistency under these indicators, the park plans to add features to the existing “text-for-status” program in partnership with the Chattahoochee National Park Conservancy. In this program, visitors can report complaints of bicycle/pedestrian user conflicts via text message. The park will work with external partners—like the Chattahoochee National Park Conservancy or the local Southern Off-Road Biking Association chapter—to encourage trail users to report bicycle/pedestrian conflicts. This system will also be advertised via park literature and signage.

Concern: A few commenters pointed out that the plan notes that there has never been a visitor capacity identification conducted for the park. The commenters asked if such an effort is envisioned in the future, as such an identification is needed.

NPS Response: Per the National Parks and Recreation Act of 1978, the National Park Service is legally required to identify and develop “implementation commitments for visitor carrying capacities for all areas of the park.” Appendix E to the plan establishes visitor capacities for the park’s land-based trail systems. Visitor capacities for other areas are outside the scope of this trails management plan and would be identified in other or future planning efforts. For example, visitor capacities for river use would be addressed in a planning effort focused on comprehensive river management.

Dog-Related Issues

Concern: Some commenters noted that there are often bags of dog waste lining the trails and this adversely affects their experience.

NPS Response: The park staff and partners have emphasized proper collection and disposal of dog waste over the past few years. Under the plan’s action alternative, dog waste stations will be included at new sign installations (“Signage and Trail Markers” section of chapter 2 of the trails plan), the dog waste disposal partnership campaign “Bag and Bin it” will be expanded (“Visitor Use and Experience” section of chapter 3

of the trails plan), educational signage for proper dog behavior will be increased (“Visitor Capacity Management Strategies” section of appendix B of the trails plan), and conflicts with dogs (including improper dog waste disposal) will be monitored as per its indicator and threshold (appendix D of the trails plan).

Concern: A commenter complained about dogs off leash at the Whitewater Trailhead, noting that these dogs off leash contribute to dog waste issues and conflict with other visitors who may have leashed their animals.

NPS Response: Dogs are required to be on-leash in the park. Information about this requirement is posted throughout the park, including at the Whitewater Trailhead. Park staff frequently patrols this area but is not able to be present at all times. Improper dog behavior will be monitored (appendix D of the trails plan), and the National Park Service will employ adaptive management strategies if improper dog behaviors exceed an established threshold.

Concern: A commenter noted that dog behavior is especially problematic at Gold Branch and suggested a fenced dog run or off-leash dog park.

NPS Response: Dogs are required to be on-leash in the park. Park managers do not believe a fenced dog area or off-leash dog park are consistent with the legislated purpose for which the park was established, nor would these be consistent with the desired visitor experience at the park. Furthermore, given the park’s location in a major metropolitan region, there are fenced or off-leash dog parks near all of the park’s 15 land units.

Concern: A commenter suggested that park management consider prohibiting dogs in some areas, on specific trails, or in certain units where there are problems with dogs.

NPS Response: The plan contains several strategies to improve visitors’ management of their dogs, including increased use of the “Bag and Bin It” partnership campaign and education about proper dog behavior on park trails. The plan also includes an indicator for the “number of visitor complaints for conflicts with dogs.” If complaints about user conflicts with dogs exceeds the identified trigger, educational efforts will be increased, and the park will pilot a prohibition of dogs on specific trails experiencing a high concentration of user conflicts with dogs. If user conflicts with dogs exceed the identified threshold, dogs may be permanently prohibited on trails that experience a high concentration of user conflicts with dogs.

Multiple Uses of Trails

Concern: A commenter suggested that the park should direct pedestrians on multiuse trails to walk in the opposite direction from bikes.

NPS Response: National Park Service partners rehabilitated the popular Sope Creek multiuse trail loop in fall 2020, with the goal of improving the structural sustainability of these highly used trails and improving visitor safety. This trail system is a natural surface trail (classified as type 2 in appendix F of the trails plan) that is on average 4 feet in width. Following the rehabilitation, the National Park Service installed

bidirectional trail signage orienting pedestrians and bicyclists in different directions to reduce visitor conflicts between the two user groups. Bidirectional circulation improves the line of sight between users (e.g., a pedestrian hiking clockwise would be better able to see an oncoming bicyclist traveling counterclockwise).

Beyond the Sope Creek multiuse system, all other park trails that allow bicycle use are wider on average, and therefore, user conflicts do not occur as frequently. Per appendix D in the trail management plan, the National Park Service will monitor conflicts between bicyclists and pedestrians on all park trails. If the number of user conflicts exceeds an established threshold, park managers will implement adaptive management strategies (e.g., trail separation of pedestrians and bicyclists on an individual trail with a high level of conflicts) to improve the trail's social sustainability.

Concern: A commenter noted that in some locations of the plan, multiuse trails are described as being open to bikes and pedestrians. Elsewhere in the plan, multiuse trails are described as being open to pedestrians, bikes, and e-bikes. The commenter suggested noting e-bikes would be allowed on multiuse trails throughout the document.

NPS Response: Per the Superintendent's Compendium in 36 CFR 4.30 (i), "E-bikes are allowed in the park where traditional bicycles are allowed. E-bikes are prohibited where traditional bicycles are prohibited. Except where use of motor vehicles by the public is allowed, using the electric motor to move an e-bike without pedaling is prohibited." See the compendium at <https://www.nps.gov/chat/learn/management/superintendents-compendium-2021.htm> for full language and references that govern the use of e-bikes in the park.

Given this regulatory interpretation, there is no distinction between bikes and e-bikes, in terms of where they are allowed in the park. In this way, "bikes" in the plan can be understood to include e-bikes. For this reason, under the description of alternative 1 in chapter 2, the plan states: "Throughout this document, the terms "biking" and "bicycles" refer to both traditional bicycles and electric bicycles (or e-bikes), unless otherwise specified." This is the first logical place in the document to make this clarification. Adding e-bikes throughout the document would be redundant.

Concern: A commenter asked what micro-mobility devices will be allowed on the multiuse trails. The commenter specifically mentioned scooters (motorized and nonmotorized), electric skateboards, and one-wheels.

NPS Response: Per the Superintendent's Compendium in 36 CFR 1.5(a)(2), "motorized wheelchairs and 'other power-driven mobility device' (OPDMD) personal transporters are allowed on trails where bicycle and e-Bikes are authorized when used by persons with mobility disabilities. Any OPDMD must abide by all laws pertaining to e-bikes."

Changes to the Trail System

Concern: Several commenters expressed opposition to removing the hilltop trail at Medlock Bridge. Commenters noted this is a beautiful and desirable trail that follows a rock ledge.

NPS Response: The National Park Service considered the quality of the hilltop experience in its redesign of the Medlock Bridge trail system. For this reason, the plan states “the three fall-aligned trails that access its one hilltop would be simplified and significantly rerouted to achieve a sustainable design that still allows for scenic views.” A map error was associated with a portion of the “hilltop trail,” which still will access the high point of the unit but is more sustainably aligned. The error has been corrected as noted in the errata.

Concern: Several commenters wanted to ensure that the park’s trails are well marked so that visitors don’t become lost. Commenters noted that maps, mileages, trail names, trail markers, “you are here” notations, trail marker numbers, a standard orientation, and a QR code for map downloads are all helpful tools.

NPS Response: As described in the “Signage and Trail Markers” section of the description of alternative 2 in chapter 2, “Trails and destinations would be clearly marked with signs. Signage located at trailheads and trail access points would be standardized and improved to (1) provide an inviting gateway to the park units and inform visitors they are entering an NPS site, (2) set appropriate expectations about the experiences visitors are likely to have, and (3) provide wayfinding information and basic rules and regulations. Trail markers would be installed at trail junctions and destinations as necessary. . . Signage design would be coordinated with regional trail systems that intersect with park units and would incorporate multiple languages and symbols to better communicate with the significant non-English-speaking visiting population.”

Concern: A commenter expressed concern that the park is closing access to Lover’s Leap Rock at Vickery Creek. The commenter opposed this action, since it is a primary destination in the park and one of the trail system’s highlights. The commenter noted that there is no trail to the base of the Lover’s Leap.

NPS Response: The plan does not call for closing access to Lover’s Leap. Under the unit-specific description for Vickery Creek in chapter 2, the plan states that “efforts would be made to improve visitor safety as well as the experience of climbers and pedestrians at Lovers Leap.” In the appendix B description of actions at Vickery Creek, the plan describes a “semiformal rock ‘scramble’ route to facilitate sustainable, unroped travel between the top and bottom of the crag.” As shown in the map in figure B-32, the trail system accesses the top of Lover’s Leap where the impressive view exists. Access to the bottom of the climbing crag would be via rappel or the semiformal rock scramble.

Overall, the plan aims to provide access to desired experience at Lover’s Leap for both climbers (climbing) and pedestrians (scenic viewing), while ensuring safety for both

groups and sustainability of the trail system. For this reason, no formal trail access to the base of the Lover's Leap is included in the plan.

Restrooms

Concern: Several commenters requested that the park look at expanding the presence of restroom facilities. Commenters noted these would reduce issues with human waste in the park including the smell of urine in some areas near boat launches and solid waste near trails. Commenters mentioned Sope Creek, Medlock Bridge, and Jones Bridge (Chattahoochee River Environmental Education Center area) as locations that could use restroom facilities, even if they are just portable toilets.

NPS Response: Under the description of the preferred alternative in chapter 2, in the "Trailheads and Trail Access Points" section, restrooms are one facility that may be included at park trailheads. However, the plan does not call for additional restrooms at any trailheads at this time. Facility improvements such as restrooms are out of scope for this plan, but that does not preclude their addition in the future.

Parking

Concern: Some commenters remarked that they often have difficulty finding designated parking when visiting the park and trying to use its trails. Some commenters added that more parking should be included in the plan.

NPS Response: While the trail system's parking areas are not the focus of the plan, the plan does include an indicator to monitor the "number of days when incidents of unauthorized parking occur" at trailheads. If the threshold of "incidents of unauthorized parking occur on no more than 10% of days in a given month per lot" is approached or exceeded, several strategies may be used, including providing education about when peak times and full parking lots tend to occur and suggesting times and places where parking is more likely to be found. Strategies like these would increase the likelihood of visitors finding parking.

Concern: A commenter noted that many of the parking lots in the park need to be resurfaced or repainted.

NPS Response: The parking lots are not the focus of the plan, and actions specific to parking lot design, layout, and maintenance are considered outside the scope of the plan. The park's facility management staff make every effort to maintain the park's parking lots through base appropriations and project funding.

Concern: A commenter objected to the paving of the Indian Trail trailhead/parking lot and access road for several reasons. Reasons included that the redesigned parking lot accommodates fewer vehicles than the current lot, which is already frequently filled well beyond its capacity; the conversion of permeable surface to impermeable surface, which exacerbates water runoff and erosion issues; loss of trees; inconsistency between the developed arrival atmosphere and the relatively quaint parking lot; and high cost.

NPS Response: The paving and redesign of the Indian Trail trailhead is outside the scope of this plan, as the plan does not address the design, layout, and maintenance of parking lots. This particular effort at Indian Trail was underway prior to initiating the comprehensive trail planning effort.

Concern: A few commenters expressed concern that the Whitewater Trailhead is being removed. Commenters noted the parking lot at Whitewater is the largest parking area in the Palisades unit and provides park access to persons who cannot hike the more challenging, hillier sections in other parts of the unit.

NPS Response: The National Park Service does not have plans to remove the trailhead at Whitewater Creek. Park managers do have concerns related to hydrological patterns in both Long Island and Whitewater Creeks that might impact visitor infrastructure in the future, including park trails. Staff will continue to monitor the patterns of both tributaries.

Concern: Several commenters noted that security in the trail system's parking lots is an issue, with cars often getting broken into, particularly at Gold Branch. Commenters suggested more rangers to improve security in parking lots as well as security cameras.

NPS Response: Parking lots and trailheads across the metro Atlanta area, both on and off NPS land, have seen elevated levels of vehicle break-ins in 2021 and 2022 that are linked to organized crime groups. The National Park Service is cooperating and sharing intelligence with local jurisdictions as well as increasing law enforcement presence in areas with a high number of break-ins. Security cameras have recently been deployed at selected trailheads, and footage is monitored by multiple law enforcement jurisdictions.

Partnerships and Stewardship

Concern: Commenters mentioned that the National Park Service should partner with the nongovernmental organization Trout Unlimited to encourage improved stewardship of the park by anglers. Commenters observed that anglers might litter and heavily use some areas of the park like Bowmans Island.

NPS Response: The National Park Service has had success partnering with user-oriented nongovernmental organizations at the park to encourage awareness of best stewardship practices, rules, and regulations. For example, the National Park Service has successfully partnered with the Upper Chattahoochee Chapter of Trout Unlimited, the University of Georgia, City of Sugar Hill, Georgia Department of Natural Resources, and Gwinnett County Soil and Water Conservation District to restore the Crayfish Creek tributary in the Orrs Ferry unit. The National Park Service will explore if similar partnership opportunities exist with fishing user groups at Bowmans Island and elsewhere in the park.

Concern: A commenter suggested that the National Park Service should partner with rafting companies to develop stewardship of the Bowmans Island unit. The commenter noted that a business that operates in an area is more likely to care for and steward a place.

NPS Response: The National Park Service currently has one concession contract with a river operator (currently held by the Nantahala Outdoor Center) and several authorized outfitters to provide river-based recreation. The National Park Service will continue working with these organizations to ensure resource protection and visitor education are part of these organizations' efforts to steward the river.

Concern: A commenter encouraged the National Park Service to strengthen partnership relationships with the US Army Corps of Engineers and Forsyth County to improve management of the river in the park's origin at Bowmans Island.

NPS Response: As a linear park in an urban and suburban environment, the National Park Service works with many municipalities, counties, state and federal agencies, and private landowners to address issues that cross boundaries and jurisdictions. The National Park Service partners with these stakeholders and neighbors to advance strategic park priorities and will continue to maintain and strengthen working relationships. Any coordination and planning related to comprehensive river management would be addressed in a separate planning effort and through park operations.

Connectivity with Chattahoochee RiverLands and Regional Trail Systems

Concern: Several commenters expressed concern that the plan doesn't do enough to connect with the regional Chattahoochee RiverLands greenway. Commenters noted that they consider the greenway from Buford Dam to Coweta County a priority and mentioned that the greenway would connect the park's various units together and provide cohesiveness to the park. Commenters also noted the greenway would increase use of the park, help to connect the local population with park resources, and fulfill two of the goals of the plan: "create a trail system that acts as a common thread between 15 individual parks units" and "enhance or enable appropriate connectivity with existing or planned regional trail networks."

NPS Response: The recent Chattahoochee RiverLands Greenway Study reconsiders the region's relationship to the river and proposes a 100-mile uninterrupted multiuse linear network of greenways, blueways, and tributary trails connecting people to parks, the river, and other key destinations. Portions of the proposed greenway connect to units at Chattahoochee River National Recreation Area, and the National Park Service is committed to advancing these regional trail connections where possible.

As described in the "Planning Context: Relationship to Other Regional Planning Efforts" section of chapter 1:

... Portions of the proposed greenway connect to units at Chattahoochee River National Recreation Area, and the National Park Service is committed to advancing these regional trail connections...

The RiverLands Greenway Study (Chattahoochee RiverLands 2020) recommends a preferred alignment at various locations throughout the study

area but also recognizes that in many places, this alignment may prove infeasible. The RiverLands Study offers multiple alignments, including a practical alignment, to ensure that the greenway has continuous connections along its entire length. According to the RiverLands report, the “Practical Alignment takes advantage of existing trail infrastructure, easements, or publicly owned land where hurdles to trail implementation are comparatively lower.” Inclusion of proposed greenway alignments in specific units in this comprehensive plan was based on maintaining desired resource conditions as defined in the park’s 2009 general management plan as well as the desired conditions for trails set forth in this plan and other operational considerations. The general management plan guides park management and identifies zones that describe the appropriate balance between visitor activities and resource protection. In some areas of the park, the desired condition is to prioritize the protection of natural resources along the riverbank as buffer zones from development.

Through the development of the trails management plan, the National Park Service determined that in some cases the RiverLands’ preferred alignment was not viable due to conflicts with the general management plan’s desired conditions, the park’s operational capacity to manage for increased visitation, or due to unacceptable threats to resource conditions. In cases where the NPS preferred alternative of the trails management plan does not align with the RiverLands preferred alignment, the park encourages the adoption of the RiverLands’ practical greenway alignment.

In addition, this comprehensive trails management plan identifies greenway corridors throughout several park units. However, this plan is not proposing a commitment by the National Park Service to construct the greenway in those areas, nor a commitment for any resources or funding for its further planning. Rather, this plan is intended to serve as a roadmap to park partners and provide direction on design standards and limitations for the greenway on NPS lands and identify the available corridors for the greenway through Chattahoochee River National Recreation Area. Any implementation of greenway construction would be fully dependent on partner resources as a component of a larger regional effort.

Neighboring Developments

Concern: Several commenters discussed issues related to park visitors accessing the Orrs Ferry unit from the Wild Timbers Homeowner Association. Alleged issues included unauthorized parking in the neighborhood, vandalism, unauthorized pond fishing, and trespassing. Commenters encouraged the National Park Service to build a fence along the NPS property or improve signage denoting the park boundary.

NPS Response: Improving available recreational opportunities at Orrs Ferry is included in the plan. The plan calls for increasing signage in this unit delineating the NPS property from adjacent residential areas and landowners in the near term.

Mid-term actions include constructing a modest natural surface trail system adjacent to the river and away from adjacent development. Access to this unit would be improved and formalized through a trailhead along Highway 20. Together, these efforts to provide formal access to Orrs Ferry are expected to diminish the public demand for unauthorized access via the Wild Timbers Homeowner Association.

This area may also be a prime candidate for a secondary trail access point. Per the “Trailheads and Trail Access Points” section of the preferred alternative description in chapter 2, secondary trail access points are “on land not owned or managed by NPS and include trail access and signage” and “are typically owned and managed by park neighbors such as homeowners’ associations or apartment complexes.” The National Park Service would be happy to work with this homeowner association to designate a secondary access point, which would not be shown on widely distributed maps of the park per the plan or advertised as public access in any way. The secondary access point would, however, help to focus pedestrian travel through the area on one designated route deemed acceptable and sustainable by the National Park Service and the homeowner association, thereby decreasing some of the alleged dispersed activities described by commenters.

Invasive Plant Species

Concern: Multiple commenters expressed concern about the presence and spread of invasive plant species (e.g., Japanese stiltgrass, English ivy, bamboo, privet) in the park. One commenter recommended that volunteers conducting plant surveys should be Georgia-certified pesticide applicators to meet the Integrated Pest Management standards and encouraged the plant surveyors to notify Chattahoochee National Park Conservancy of locations of key invasive plant species so their volunteers can address the issue.

NPS Response: Park managers are aware of the invasive plant species in the park. Currently, only Georgia-certified herbicide applicators that are park staff, regional NPS staff, or contractors engage in the treatment of invasives plant species on park land. A program is currently being piloted that will train qualified volunteers to assist with the treatment of invasives working under the guidance of a Georgia-certified contractor or staff. The application of Integrated Pest Management standards at the park will continue to be managed by staff per NPS policy with the support and help of park partners such as the Chattahoochee National Park Conservancy.

Design Suggestions

Concern: A commenter suggested that railings on river overlooks should be slanted inwards to prevent litter from inadvertently falling into the river after people set items on the top rails.

NPS Response: The National Park Service will consider this suggestion in the design of any river overlooks or railings where items may inadvertently fall into the river.

Camping

Concern: One commenter suggested that the National Park Service consider including dispersed, primitive campsites for trail hikers and users of the designated water trail. The commenter noted that a permit system could be put in place that is similar to how backcountry permits are managed elsewhere in the national park system.

NPS Response: Camping was not included in the scope of this planning effort. The development and management of campsites in the park would be addressed in a separate planning effort.

Implementation

Concern: Some commenters wondered if there will be further opportunities for engagement on the plan.

NPS Response: Public review and comment on the draft comprehensive trail management plan was the third and final round of civic engagement on the trail planning effort. See chapter 4 for a description of the previous civic engagement, which included an online geo-focused public comment tool in 2018 and a review of preliminary strategies in 2021.

While there are no further rounds of civic engagement planned, the park may work with partners and stakeholders on specific actions and strategies and may seek public input on them as appropriate.

Concern: A commenter expressed concern that trail project priorities are not clearly identified in the plan.

NPS Response: Appendix B of the plan includes actions for each unit of the park's trail system sorted into near-term, mid-term, and long-term actions. These categories reflect the relative priority of the actions.

Concern: Commenters noted that there are existing social trails in the park that are not designated on maps. A commenter noted that social trails appear on some maps but not on others.

NPS Response: The park has mapped and identified a substantial network of social trails throughout most of the land units. New social trails are frequently encountered. Dissuading the further development of social trails is a goal of the trails management plan. All existing social trails are proposed for closure and restoration except in situations where they are to be adopted into the new official trail system. The only social trails indicated on maps in the trails management plan are those intended for adoption as official trails.

Concern: Several commenters pointed out a variety of mapping errors and omissions. Most of these errors were associated with features other than trail routes, but comments were also received on segments of trails in the Vickery Creek and Medlock Bridge units.

NPS Response: The park appreciates the careful attention to detail provided by commentors and has updated the appendix A and B trail maps in the Comprehensive Trails Management Plan with corrections provided during the public review period. The list of editorial changes to update maps and tables from the public review version of the plan/EA are presented in the errata to the plan/EA (see appendix C of this document).

ATTACHMENT B: FINDING OF NON-IMPAIRMENT

NON-IMPAIRMENT DETERMINATION FOR THE COMPREHENSIVE TRAILS MANAGEMENT PLAN

THE PROHIBITION ON IMPAIRMENT OF PARK RESOURCES AND VALUES

National Park Service (NPS) *Management Policies 2006*, section 1.4.4, explains the prohibition on impairment of park resources and values:

While Congress has given NPS the management discretion to allow impacts within parks, that discretion is limited by the statutory requirement (generally enforceable by the federal courts) that the NPS must leave park resources and values unimpaired unless a particular law directly and specifically provides otherwise. This, the cornerstone of the Organic Act, establishes the primary responsibility of the NPS. It ensures that park resources and values will continue to exist in a condition that will allow the American people to have present and future opportunities for enjoyment of them.

WHAT IS IMPAIRMENT?

National Park Service *Management Policies 2006*, section 1.4.5, “What Constitutes Impairment of Park Resources and Values,” and section 1.4.6, “What Constitutes Park Resources and Values,” provide an explanation of impairment.

Impairment is an impact that, in the professional judgment of the responsible NPS manager, would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values (NPS 2006).

Section 1.4.5 of NPS *Management Policies 2006* states:

An 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, or*
- key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or*
- identified 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.

Per section 1.4.6 of NPS *Management Policies 2006*, park resources and values that may be impaired 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, structure, 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.*

Impairment may result from NPS activities in managing the park, visitor activities, or activities undertaken by concessioners, contractors, and others operating in the park. Impairment may also result from sources or activities outside the park, but this would not be a violation of the Organic Act unless the National Park Service was in some way responsible for the action.

HOW IS AN IMPAIRMENT DETERMINATION MADE?

Section 1.4.7 of NPS *Management Policies 2006*, states, “[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; consultations required under section 106 of the National Historic Preservation Act; 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.

National Park Service *Management Policies 2006*, further defines “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.”

NON-IMPAIRMENT DETERMINATION FOR THE SELECTED ALTERNATIVE

This determination on impairment has been prepared for the selected alternative (alternative 2) described in chapter 2 of the *Comprehensive Trails Management Plan/Environmental Assessment*, April 2022, and revised with the FONSI and appended errata. A non-impairment determination is made for all resource impact topics analyzed in detail for the selected alternative with the exception of visitor use and experience because impairment findings relate back to park resources. Visitor use and experience is not generally considered to be a park resource under the Organic Act and cannot be impaired in the same way that an action can impair park resources.

Non-Impairment Findings for Vegetation

Creation of the park allowed for the preservation of natural resources, including its many terrestrial habitats for many species of plants (NPS 2017). Protection of these plant species is fundamental to the park's purpose. Construction and operation of the trail system under the selected alternative will remove up to 62.6 acres of vegetation. However, the vegetation communities that will be affected make up a small percentage of the park (1.3%), are not rare, and can be found in abundance in the park. In addition, mitigation measures will be implemented to protect plant species of concern and control invasive plants. Therefore, no impairment of vegetation will occur under the selected alternative.

Non-Impairment Findings for Wildlife – Birds, Denning Mammals, and Herptiles

Creation of the park allowed for the preservation of natural resources, including its many terrestrial habitats for many species of wildlife (NPS 2017). Protection of these wildlife species and their habitats is fundamental to the park's purpose. No long-term, population-level impacts are expected to any analyzed species; no federally listed species or critical habitat will be adversely affected; and any habitat changes are not expected to result in population-level impacts; therefore, the selected alternative will not result in the impairment of wildlife.

Non-Impairment Findings for Soils

Productive soils are fundamental to the park's purpose because they contribute to the ecological health and diversity of the park's natural resources (NPS 2017). While the selected alternative will disturb soils in the project area, only 1.3% of soils in the park will be permanently affected via removal during initial construction and later compaction and erosion of trails. In areas with exposed soils, like trails, trail design and regular maintenance will ensure limited impacts on soils. Because the area of permanent impacts on soils under the selected alternative will be small relative to the park area and will not impede the purpose of the park to protect the diversity of natural resources, no impairment of soils will occur.

Non-Impairment Findings for Wetlands

Productive wetlands are fundamental to the park's purpose because they contribute to ecological health and are critical to maintaining high-quality visitor experiences (NPS 2017). While the construction and operation of the selected alternative will disturb wetlands in the

project area, only 1% of wetlands will be permanently affected. Because the area of permanent impacts on wetlands under the selected alternative will be small relative to the park area and will not impede the purpose of the park to protect the diversity of natural resources, no impairment of wetlands will occur.

Non-Impairment Findings for Archeological and Historic Properties

Creation of the park allowed for the preservation of cultural resources, including its many archeological resources, which is identified as a fundamental resource and value of the park (NPS 2017). While the construction of trails and facilities under the selected alternative will occur in the vicinity of known and potentially unknown archeological and historic resources, the 2008 NPS Nationwide Programmatic Agreement and this Trails Plan Programmatic Agreement (attachment D) provides a process to complete appropriate surveys and National Register of Historic Places eligibility determinations prior to implementation of individual trail projects. The agreement also provides for minimizations or avoidance procedures to ensure that any possible impacts to historic properties are minimized or eliminated. Because the execution of the programmatic agreement will ensure no significant impacts to archeological and historic properties during the implementation of the trails plan, no impairment of these resources will occur.

CONCLUSION

The National Park Service has determined that implementation of the selected alternative will not constitute an impairment of the resources or values of the park. This conclusion is based on consideration of the park's purpose and significance; a thorough analysis of the environmental impacts described in the revised EA, comments provided by the public and other agencies, and the professional judgment of the decision maker guided by the direction of NPS *Management Policies* 2006.

REFERENCES

- US Department of the Interior, National Park Service (NPS)
2006 *Management Policies*. US Department of the Interior, National Park Service, Washington, DC.
<https://www.nps.gov/orgs/1548/upload/ManagementPolicies2006.pdf>
2017 *Foundation Document, Chattahoochee River National Recreation Area, Georgia*. US Department of Interior, National Park Service.

ATTACHMENT C: ERRATA

This errata contains corrections and minor revisions to the environmental assessment. Page numbers and section/sentence locations referenced pertain to the public review draft EA from April 2022. The edits and corrections in this errata do not result in any substantial modification being incorporated into the selected action, and it has been determined that the revisions do not require additional environmental analysis. The errata, combined with the EA, comprises the only amendments deemed necessary for the purposes of completing compliance and documentation for the project. Existing text to remain in the environmental assessment is found in *italics*, additions to the text are underlined, and deleted text is shown in ~~strikeout~~. Two tables indicating graphic corrections to the maps provided in the public review draft EA is also included (see tables on pages 48 and 49). These amendments to the text and maps are detailed in this errata and will be incorporated into the EA and posted to the public website with the decision document.

Chapter 1, page 1, third paragraph: *Sope Creek* subunit

Chapter 1, page 4, first paragraph: Chapter 1, page 1, third paragraph: *The Chattahoochee RiverLands Greenway Study (Chattahoochee RiverLands 2020) is funded in partnership by Atlanta Regional Commission, The Trust of the Public Land, Atlanta Regional Commission, City of Atlanta, and Cobb County.*

Chapter 1, page 5, first paragraph under “2009 GMP Zones”: *The following text summarizes the land-based zone descriptions. For complete descriptions, see the 2009 general management plan.*

Chapter 1, page 11, Climate Change paragraph: ~~participation~~ precipitation

Chapter 2, page 22, Abbotts Bridge Greenway Pilot Project: *1.1 mile multiuse*

Chapter 2, page 24: ... *All trail work in the park would follow the guidance provided in appendix F. If inadvertent discoveries occur during implementation, consultation would occur with the state historic preservation officer and tribal historic preservation officers, as appropriate.*

Chapter 2, page 27, McGinnis Ferry Desired Condition Statement (first sentence): *pedestrian-only trails*

Chapter 2, page 31, Holcomb Bridge Description of Actions: *Holcomb Bridge Park (Gwinnett County)*

Chapter 2, page 33, Gold Branch “GMP Zone” section: *~~As with alternative 1, the unit’s zone would not change from the 2009 general management plan. All trails are in the Natural Zone. All natural surface trails are in the Natural Zone under the 2009 general management plan. Under this alternative, the segment of the Lower Roswell Road Multiuse Trail along the western boundary of Gold Branch would be rezoned to the Developed Zone. The park has managed the border of Gold Branch along Lower Roswell Road as a heavily used transportation trail and intends to continue doing so, given the unit’s proximity to the~~*

communities of East Cobb and Roswell. Zoning this corridor of Gold Branch as Natural Zone is inconsistent with actual management.

Chapter 2, page 33, Gold Branch “Desired Condition Statement” section: Visitors would have a more social experience along the Lower Roswell Road Multiuse Trail, which would serve as an easily accessible transportation trail and greenway corridor. In the interior of Gold Branch, visitors would experience a quieter and more tranquil setting than in many of the other units, with some opportunities for solitude.

Chapter 2, page 33, Johnson Ferry “GMP Zone” section: As with alternative 1, the unit’s zone would not change from the 2009 general management plan. Trails near the Johnson Ferry North Trailhead are in the Developed Zone, while trails further to the north are in the Natural Area Recreation Zone. The Hyde Farm area of this unit would remain in the Historic Resource one. Johnson Ferry South is in the Rustic Zone. Under the 2009 general management plan, trails near the Johnson Ferry North Trailhead are in the Developed Zone, while trails further to the north are in the Natural Area Recreation Zone. The Hyde Farm area is in the Historic Resource Zone, and Johnson Ferry South is zoned is in the Rustic Zone in the general management plan. Under this alternative, the Hyde Farm area of Johnson Ferry North would remain in the Historic Resource Zone, the northern portion of Johnson Ferry North would remain in the Natural Area Recreation Zone, and the interior of Johnson Ferry South would remain in the Rustic Zone. However, a section of Johnson Ferry along Columns Drive, which includes the multiuse shared path, would be rezoned to the Developed Zone. Park staff has actively managed this corridor as a developed transportation corridor and intends to continue doing so. Zoning this corridor as Rustic is inconsistent with this ongoing management.

Chapter 2, page 34, Johnson Ferry “Desired Condition Statement” section: Visitors would encounter a high density of people along the Columns Drive greenway corridor, which would provide accessible multiuse connectivity between the Johnson Ferry North and Cochran Shoals units. In the heart of Johnson Ferry South, visitors would experience a tranquil and relaxed atmosphere in the southern portion of Johnson Ferry despite the proximity to adjacent neighborhoods and major transportation corridors.

Chapter 2, page 36 photograph: Photo Credit: Harris Clayton Shawn Taylor

Chapter 2, page 37, General:

- *Construction zones for rerouted and new trails, as well as staging areas and work zones, would be identified and demarcated with construction tape or something similar before any construction activities begin. The tape would define the zones and confine the activity to the minimum area needed for the trail work. No disturbance would occur beyond these limits other than protection measures for erosion/sediment control.*

Chapter 2, page 37–38, Visitor Safety:

- *Per NPS standards, NPS ~~trail crews~~ staff would coordinate and supervise any trail ~~Chattahoochee River National Recreation Area~~ construction or maintenance. Specifically, the National Park Service would monitor and/or direct the placement of all*

~~placing the water bars; placement of drainage; brushing and clearing; revegetation; identifying selection of where to obtain fill and other materials for trails; and determination of how to apply fill materials such as soil, gravel, and rocks.~~ The park's sustainable trail guidelines (see appendix F) will guide trail construction and maintenance.

- *To minimize the amount of ground disturbance, staging areas would be in previously disturbed areas, away from areas of high visitor use ~~areas~~ to the extent possible. All staging and stockpiling areas would use existing disturbed lands to the extent possible and would be rehabilitated to natural conditions following trail construction work.*

Chapter 2, page 38, Natural Resources:

- *New and existing trails would avoid rare plant species or large tracts of forest areas with high diversity and quality. Two actions would occur to verify the presence of rare plants in proposed trail areas. First, a review of historical plant data and a site survey should be conducted by park natural resource staff. Secondly, a site survey, upon initial flagging of a proposed trail alignment, will be conducted to identify milkweed and rare plants or sensitive vegetative communities where initial review may identify the presence of sensitive species. The survey will be conducted by park natural resource staff or contract professionals to identify conditions in a trail planning area with a 100% visual survey of the proposed alignment.*

Chapter 2, page 40, Natural Resources:

- *The riparian buffer zones or setbacks of trails adjacent to or crossing rivers and streams will be considered and protected where feasible during site planning, including local buffers and the river and tributary buffers established by the Metropolitan River Protection Act, which protects a 48-miles stretch of the Chattahoochee River between Buford Dam and Peachtree Creek. The trail location outside of the established riparian function buffer zone will be established whenever feasible. When it is not feasible to establish a trail outside of a buffer, the Metropolitan River Protection Act, Georgia Erosion and Sedimentation Control Act, and state stream buffer variance processes would be followed to ensure that all tributaries and the river are protected. If trails are sited for river viewing purposes within the riparian function buffer zone, adherence to the Georgia Department of Natural Resources Streambank and Shoreline Stabilization Guidance (2011) Chattahoochee River Streambank Stabilization Plan Guidance will be reviewed for additional protection measures.*

Chapter 2, page 40, Natural Resources, new bullet:

- Streambank improvement/restoration would be used, as possible, to mitigate trail impacts, using native plants along banks to improve stability, prevent erosion, and improve wildlife habitat and water quality. If the building or realigning of a trail results in impacts to a stream buffer, the National Park Service would use the opportunity to recommend stream restoration as a mitigation tool to prevent future erosion and improve habitat and water quality.

Chapter 2, page 40, Natural Resources, new bullet:

- Trail projects refer to Georgia's Stormwater Management Manual for additional measures to protect riparian resources.

Chapter 2, page 40, Natural Resources, new bullet:

- Trail projects would follow the requirements of the Georgia Erosion and Sedimentation Control Act and use the Manual for Erosion and Sediment Control in Georgia.

Chapter 2, page 41, Cultural Resources:

- *The park would execute a programmatic agreement in coordination with consulting parties, including the state historic preservation office and affiliated tribes, which describes historic identification actions as well as minimization and avoidance practices should it be determined that a proposed implementation action may impact a historic property (see Attachment D).*
- *Before construction begins, the recreation area would conduct an archeological survey along the potential route of any new trails to identify currently unknown and significant archeological resources so that they may be avoided. If the effects on resources could not be avoided or minimized within the trail corridors developed for this plan, further consultation with the state and tribal historic preservation offices and the Advisory Council on Historic Preservation according to 36 CFR 800 would be conducted, as necessary, to resolve an appropriate alternative.*
- *Should construction unearth previously undiscovered cultural resources, work would be stopped in the area of discovery, and the park would consult with the state and tribal historic preservation offices and the Advisory Council on Historic Preservation, as necessary, according to 36 CFR 800.13. In the unlikely event that human remains, funerary objects, sacred objects, or objects of cultural patrimony are discovered during construction, provisions outlined in the Native American Graves Protection and Repatriation Act (25 USC 3001) of 1990 would be followed.*
- *The park will consult with subject matter experts (cultural resource management team) about trails within close proximity to cultural resources.*

Chapter 2, page 42, Trail Development and Management:

- Where trails are proposed in disturbed or previously developed areas of the park, considerations and verification of the following items should be included: presence of utilities, established right of ways, remaining structures, cultural or archeological significance, and presence of hazardous materials or contaminated conditions. If any of these conditions exist on the proposed site, a determination of impact and trail alignment options would need to be developed to address the conditions present.
- Incorporate low impact development and/or infiltration techniques into new construction or reconstruction of existing, impervious areas such as rain gardens,

constructed wetlands, infiltration swales or basins, grass (or vegetated) filter strips or swales, tree islands or planters, permeable pavement, and surface sand filters.

- *All new trails and reroutes of existing trails would employ sustainable trail techniques and be constructed according to the design parameters outlined in the Chattahoochee River National Recreation Area Sustainable Trail Guidelines (see appendix F). ~~Trail~~ class designations are identified in appendix F and inform the above prioritization and all other trail work.*

Chapter 2, page 42: Staffing and Cost Estimates: *Chattahoochee River NRA has a long history of successful philanthropic partnerships, including collaborative projects that have funded trail construction and design (this comprehensive trails plan included). In recent years, the Chattahoochee National Park Conservancy, the park's primary philanthropic partner, and the Trust for Public Land donated over \$100,000 for an initial parkwide trail assessment. Collectively, the conservancy has invested more than \$475,000 in the park's trails and trailside infrastructure over the last five years.*

Chapter 2, page 43, table 6: ***These resources are anticipated to be provided by philanthropic and community partners over the life of the plan.

Chapter 3, page 45, Impacts on Vegetation Alt 2:

Under the action alternative, newly constructed trails and adopted social trails would result in the permanent removal of up to 69 acres of vegetation. The summation of newly constructed trails includes the potential greenway trail segments. The total acreage accounts for the maximum width of the trails and the maximum necessary horizontal clearance of vegetation thinning and trimming needed to construct the trails, as outlined in appendix F. Trail widths and horizontal clearance are based on their trail type, as outlined in appendix F.

- *Impacts to vegetation are subdivided by vegetation type in table 7 below. Most acres of impact fall within forest vegetation, up to 66 acres. Acres of impact to marsh, shrub grass, and other vegetation types account for up to 0.5 acres, 1.9 acres, and 0.9 acres, respectively. When the maximum potential acreage of impact of the action alternative are compared to the total acreage of that vegetation type in the park, there is less than a 2% impact to each vegetation type (table 7). In total, the action alternative proposed in this trails management plan equates to up to approximately 1.5% impact to vegetation.”*

Chapter 3, page 47:

- *In total, when accounting for the acreage of restored trails, the action alternative would result in adverse impacts to up to approximately 62.6 acres of vegetation. Mitigation measures and best management practices listed in chapter 2 would be implemented to reduce adverse impacts to vegetation from these actions. The impacts would be even less noticeable parkwide, since at least 4,638 acres of vegetation would be unaffected. Therefore, the actions proposed under the action alternative would not be expected to impact the long-term viability of vegetation in the park.”*

Chapter 3, page 47: Overall, the removal of vegetation would account for the small percentage of up to 1.3% total impact to vegetation within the park project area.

Chapter 3, page 52: However, this only accounts for 1.5% reduction

Chapter 3, page 56: Overall, the disturbances to soils would account for the small percentage of up to 1.3% total impact to soil within the project area park.

Chapter 3, page 59: However, overall functions of the wetlands are not likely to be noticeably altered because of the small area of ground disturbance in relation to the total acres of wetlands present in the project area park; approximately 150 acres of wetlands within the project area park, accounting for 98.4% of total wetlands, would remain undisturbed.

Chapter 3, page 63, Figure 3: Cochran Shoals Fitness Loop Bridge

Chapter 3, page 70, Impacts on Archeological Resources Alt 2: Trail maintenance has the potential to affect archeological resources as well.

Appendices Cover page, page 73: Photo Credit: Phillip Hodges

Appendix B, page B-24, Visitor Capacity management Strategies, third bullet: *Promote this unit to increase use through social media, interpretation, local news outlets, and at local attractions (i.e., Cummings, ~~Duluth~~, Lake Lanier).*

Appendix B, page B-40, Visitor Capacity management Strategies, first bullet: *Establish a separate parking lot at the north end for a dedicated greenway and overflow boat ramp parking access.*

Appendix B, page B-58, Near-Term Actions, third bullet: ~~Coordinate with the Chattahoochee River Environmental Education Center regarding public access to the parking area and cultivate a relationship with the River Glen homeowners' association.~~ Cultivate a relationship with the River Glen homeowner's association and coordinate regarding public access to the parking area at the Chattahoochee River Environmental Education Center.

Appendix B, page B-86, Visitor Capacity Management Strategies: Sope Creek, Gunby Creek, and the Fitness Loop, first bullet: *Emphasize the use of the text-for-status program so visitors know when natural surface (type 2) trails are open to biking.*

Appendix B, page B-94, Near-Term Actions, first bullet: *Improve access and parking at ~~the Indian Trail~~ Indian Trailhead.*

Appendix B, page B-94, Near-Term Actions, second bullet: *Improve trail information accessibility and wayfinding, particularly associated with parking options, access, and inappropriate parking along ~~Riverside~~ Riverview Road.*

Appendix D, page D-182, third bullet in second column: ~~Roadside~~ Unauthorized parking

Appendix E, page E-142, Management Strategies: *While ample room for growth does ~~not~~ exist at Johnson Ferry South, the unit would not be actively promoted due to the quality of visitor experiences available there.*

Appendix H, page H-175, NPS Region 2, two additional preparers added:

- John Gerbich, Planning Portfolio Manager
- Jami Hammond, Environmental Coordinator

Table of Map Edits – Appendix A: Unit Maps, Alternative 1, No Action (Existing Conditions)

Unit	Map Edit
Bowmans Island	Boat ramp icon removed (incorrect placement)
Bowmans North Detail	Boat ramp icon removed (incorrect placement)
Jones Bridge North	Restrooms labeled
Jones Bridge North	Parking icon removed (incorrect placement)
Jones Bridge South	Parking icon removed (incorrect placement)
Holcomb Bridge	Parking icon removed (incorrect placement)
Island Ford South	Parking icon removed (incorrect placement)
Johnson Ferry North	Map added
Cochran Shoals – Interstate N/Powers Island	Boat ramp icon removed (incorrect placement)
Palisades North	Parking icon removed (incorrect placement)
Palisades South	Boat ramp icon added

Table of Map Edits – Appendix B: Alternative 2 (NPS Preferred) Actions, Visitor Capacity Management Strategies, and Resultant Trail System

Unit	Action Map or Resultant Trail System Map	Map Edit
Orrs Ferry	Action & Resultant	Overlook icon changed to Fishing Access
Settles Bridge	Action & Resultant	Boat ramp location corrected
Settles Bridge North Detail	Action & Resultant	Boat ramp location corrected
Abbotts Bridge	Action & Resultant	Greenway corridor alignment adjusted
Medlock Bridge	Action & Resultant	Ridgetop trail alignment corrected
Jones Bridge North	Action & Resultant	Boat ramp location corrected
Jones Bridge North	Action & Resultant	Restrooms labeled
Jones Bridge North	Action & Resultant	Trailhead icon corrected to Primary Access
Jones Bridge South	Action & Resultant	Trailhead icon corrected to Primary Access
Island Ford South	Action & Resultant	Trailhead icon corrected to Primary Access
Vickery Creek	Action	Adopted social trail location correction
Vickery Creek	Action & Resultant	Primary Access icons added
Vickery Creek	Action & Resultant	Trail alignments corrected at Allenbrook and riverside entrance
Vickey Creek	Resultant	Route of designated “Vickey Creek Trail” shifted to Creekside path
Johnson Ferry North	Action & Resultant	Maps added
Cochran Shoals – Sope Creek Trailhead	Action & Resultant	Primary Access icons added
Cochran Shoals – Columns Drive Trailhead	Action & Resultant	Primary Access icons added
Cochran Shoals – Interstate N/Powers Island	Action & Resultant	Boat ramp icon removed (incorrect placement)
Palisades North	Action & Resultant	Overlook location corrected
Palisades North	Action & Resultant	Trailhead icon corrected to Primary Access (West Palisades)
Palisades North	Action & Resultant	Primary Access icon removed (East Palisades)
Palisades North	Action & Resultant	“No Parking” labeled at Riverview Road
Palisades South	Action & Resultant	Boat ramp icon added

**ATTACHMENT D: PROGRAMMATIC AGREEMENT FOR COMPLIANCE
WITH THE NATIONAL HISTORIC PRESERVATION ACT FOR
UNDERTAKINGS IMPLEMENTED UNDER THE CHATTAHOOCHEE RIVER
NATIONAL RECREATION AREA COMPREHENSIVE TRAILS
MANAGEMENT PLAN**

**PROGRAMMATIC AGREEMENT
AMONG
CHATTAHOOCHEE RIVER NATIONAL RECREATION AREA,
NATIONAL PARK SERVICE,
GEORGIA STATE HISTORIC PRESERVATION OFFICE,
EASTERN BAND OF CHEROKEE INDIANS,
AND THE MUSCOGEE (CREEK) NATION
REGARDING THE UNDERTAKINGS IMPLEMENTED UNDER THE
COMPREHENSIVE TRAILS MANAGEMENT PLAN
HP-210330-002**

WHEREAS, the Chattahoochee River National Recreation Area (CRNRA or Park) plans to implement a trails management plan (Comprehensive Trails Management Plan) to address trail construction and maintenance for developing and managing a parkwide trail system integrated with other recreational trails in the Atlanta metropolitan area; and

WHEREAS, most of the 64 miles of designated trail system in CRNRA consist of legacy social trails, utility corridors, and relic roads that were established before the national park, which lack connectivity to neighboring park trails, degrade water quality through erosion runoff, and damage plant habitat; and

WHEREAS, the CRNRA trail system would be redeveloped to improve its overall sustainability, protect the park's resources, and improve the visitor experience and circulation; and

WHEREAS, the overall mileage of designated trails available for public use in the park will increase substantially, and a focus will be placed on improving the quality of the trails to better serve visitors and achieve greater resource stewardship; and

WHEREAS, the National Park Service (NPS) has established Management Policies that stipulate that every "...proposed action will be evaluated to ensure consistency or compatibility in the overall treatment of park resources. The relative importance and relationship of all values will be weighed to identify potential conflicts between and among resource preservation goals, park management and operation goals, and park user goals. Conflicts will be considered and resolved through the planning process, which will include any consultation required by 54 U.S.C. § 306108" (Chapter 5.3.5, Treatment of Cultural Resources); and

WHEREAS, the CRNRA has determined that the Comprehensive Trails Management Plan and associated individual activities to be implemented under it constitute an Undertaking (36 CFR 800.16(y)), as defined by the National Historic Preservation Act (NHPA) of 1966 and the regulations implementing Section 106 (36 CFR Part 800) that has the potential to affect properties listed in or eligible for listing in the National Register of Historic Places (NRHP); and

WHEREAS, the CRNRA initiated Section 106 consultation with the Georgia State Historic Preservation Office (SHPO) and Absentee Shawnee Tribe, Alabama-Coushatta Tribe of Texas,

Alabama-Quassarte Tribal Town, Cherokee Nation, Coushatta Tribe of Louisiana, Eastern Band of Cherokee Indians, Kialegee Tribal Town, Muscogee (Creek) Nation, Poarch Band of Creek Indians, Seminole Nation of Oklahoma, Seminole Tribe of Florida, Shawnee Tribe, Thlopthlocco Tribal Town, and United Keetoowah Band of Cherokee Indians of Oklahoma on March 26, 2021; and

WHEREAS, the CRNRA has defined the Undertaking's area of potential effects (APE), shown in Appendix A, as the entire park, which encompasses 15 individual land units along the Chattahoochee River corridor; and

WHEREAS, the CRNRA contains numerous historic properties listed in or eligible for listing in the NRHP, although the entirety of the Park has not yet been systematically surveyed and some surveys may not meet professional standards. As such, there is the potential for previously undocumented sites that also may be listed in or eligible for listing in the NRHP. These properties are archaeological, historical, or of traditional and/or cultural importance to affiliated tribes and by their very nature, are non-renewable and of great worth to the American public; and

WHEREAS, the 2008 National Park Service (NPS) Nationwide Programmatic Agreement (NPA) provides for specific activities to utilize a streamlined review process, provided those undertakings meet certain requirements (see Section III. A of the NPA), and 36 CFR § 800.14(b) authorizes such Programmatic Agreements; and

WHEREAS, the development of this Programmatic Agreement by CRNRA is consistent with the intent and purposes of the NHPA and the 2008 NPS NPA and addresses the implementation of the Comprehensive Trails Management Plan at CRNRA; and

WHEREAS, in accordance with 36 CFR 800.6(a)(1), the CRNRA has notified the Advisory Council on Historic Preservation (ACHP) of the determination that effects on historic properties cannot be fully determined prior to approval of the undertaking with specified documentation, and the ACHP has chosen to not participate as a Signatory to this Programmatic Agreement; and

WHEREAS, pursuant to 36 CFR 800.2(c)(1), the SHPO has responsibilities under the NHPA to advise and assist the CRNRA in complying with its Section 106 responsibilities for proposed undertakings and is a Signatory to this Programmatic Agreement; and

WHEREAS, pursuant to the special relationship between the federal government and Native American tribes, and Section 101(d)(6)(B) of the NHPA (54 USC 302706(b)), 36 CFR 800.2(c)(2)(ii), the CRNRA is responsible for government-to-government consultation with federally recognized Native American tribes; and

WHEREAS, the CRNRA recognizes that the Absentee Shawnee Tribe, Alabama-Coushatta Tribe of Texas, Alabama-Quassarte Tribal Town, Cherokee Nation, Coushatta Tribe of Louisiana, Eastern Band of Cherokee Indians, Kialegee Tribal Town, Muscogee (Creek) Nation, Poarch Band of Creek Indians, Seminole Nation of Oklahoma, Seminole Tribe of Florida, Shawnee Tribe, Thlopthlocco Tribal Town, and United Keetoowah Band of Cherokee Indians of Oklahoma may have sites of religious and cultural significance on or off Tribal lands, and in

meeting its Federal trust responsibility, the CRNRA has engaged in government-to-government consultation with the Tribes, and has invited the Tribes to enter into this agreement that specifies how the CRNRA will carry out Section 106 responsibilities, including the confidentiality of information; and

WHEREAS, the CRNRA will continue consultation with all Tribes regardless of their signature status unless a Tribe informs the CRNRA that they no longer wish to participate in consultation for this undertaking. The Muscogee (Creek) Nation and Eastern Band of Cherokee Indians are invited signatories to this agreement. The Cherokee Nation and The Shawnee Tribe responded to the NPS and will consult on undertakings using the standard 4-step process; and

WHEREAS, for the purposes of this Programmatic Agreement, “Consulting Parties” collectively refers to the Signatories, Invited Signatories, and Concurring Parties, and other invited parties regardless of their decision to sign this Programmatic Agreement; and

NOW, THEREFORE, the CRNRA and the SHPO, the Eastern Band of Cherokee Indians and The Muscogee (Creek) Nation agree that the undertaking shall be implemented in accordance with the following stipulations in order to consider the effect of the undertaking on historic properties.

STIPULATIONS

The CRNRA shall ensure that the following measures are carried out:

I. Area of Potential Effects

For the purposes of this Agreement, CRNRA in consultation with Consulting Parties defined the Area of Potential Effect (APE) to be the entire Chattahoochee River National Recreation Area (Appendix A). The individual activities described in the trails management plan will have specific APEs due to the nature of their action. The plan includes new trail construction, minor rerouting of existing trails, trail rehabilitation (closure), trail maintenance, installation of trail signs, passive trail monitoring efforts, and educational and administrative activities.

As activities in the trails management plan are implemented, CRNRA, in consultation with the Consulting Parties, will define and document the APE for individual activities based on their potential to alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish integrity (36 CFR 60).

II. Identification and Evaluation of Historic Properties

To meet Federal responsibilities under Section 110 of the NHPA, the park conducted a comprehensive Historic Resource Study (2007) to identify historic contexts and determine the NRHP eligibility of above-ground cultural resources. A list of resources which received SHPO concurrence is included in Appendix B in addition to a comprehensive list (as of 2022) of cultural resource baseline documentation. The Park has conducted some archeological surveys,

but much of the APE is not surveyed. All ground-disturbing activities noted in the Comprehensive Trails Management Plan in areas not yet surveyed will be preceded by archaeological survey and testing in accordance with NPS-28 Cultural Resource Management Guidelines.

CRNRA shall make a reasonable and good faith effort to identify historic properties, including those of cultural and religious significance, located within the APE for each undertaking implemented under the trails management plan. CRNRA shall ensure that all work is conducted under the supervision of a cultural resource professional who meets the Secretary of the Interior's Professional Qualifications for the applicable discipline per Section 112(a)(1)(A) of the NHPA and at 36 CFR Part 800.2(a)(1) or be reviewed by Federal employees identified as a subject-matter experts (meeting the qualifications for the applicable discipline) as defined in Appendix E of NPS-28: Cultural Resource Management Guideline. Any undertaking that is determined to have no historic properties affected will be included in an annual report to the Consulting Parties and no additional requirements for Section 106 compliance will be needed.

III. Continuing Section 106 Consultation

The CRNRA will continue Section 106 consultation for undertakings implemented under this Comprehensive Trails Management Plan that do not meet IV and V of this PA. These undertakings will follow the process identified in 36 CFR Part 800 as applicable, as planning continues.

- A. If any new activities are proposed that are outside the scope of this undertaking, or if the APE is modified, the CRNRA will consult on amending this Programmatic Agreement or follow the 36 CFR Part 800 consultation process or the NPS NPA, as applicable.
- B. Projects noted in the plan that will include additional consultation include the development of a new trail system in Bowmans Island East unit, all Greenway construction, construction of new restroom facilities, additional parking in Hewlett Field supported by the Cultural Landscape Report, construction of a viewing structure at Gold Branch, stonework at Allenbrook, and the development of trails connecting Johnson Ferry North and Hyde Farm. Other projects that may overlap with trail plan recommendations but will be led by another Federal agency (Roswell Gateway, Abbotts Greenway, etc.) will follow 36 CFR Part 800.

IV. NPS Nationwide Programmatic Agreement

Several of the individual activities included in the Trails Management Plan are the same as streamlined activities in the NPS NPA (2009). (Stipulation III.C). To meet criteria for Streamlined Review, undertakings must have a determination of eligibility, not cause an adverse effect, and include review of a Cultural Resource Management Team. The two streamlined activities in the NPS NPA that address trail-related undertakings directly are Streamlined Activity #2 and Streamlined Activity #3: “

2. Rehabilitation and/or Minor Relocation of Existing Trails, Walks, Paths, and Sidewalks: The Streamlined Review Process may be used for undertakings proposed on existing non-historic trails, walks, paths, and/or sidewalks that are located within previously disturbed areas and do not exceed the depth of the previous disturbance. The Streamlined Review Process may also be used for undertakings proposed on existing historic trails, walks, paths, and/or sidewalks, provided that the proposed undertaking is conducted in accordance with an approved treatment plan (such as a historic structure report, cultural landscape report, or preservation maintenance plan). If the project activities include ground disturbance, archeological monitoring may be appropriate throughout the ground disturbing activities, in accordance with any recommendation of the CRM Team. When monitoring is recommended, members of any appropriate Federally recognized Indian Tribes or Native Hawaiian organizations may be invited to participate in monitoring. This streamlined activity includes the following undertakings, as well as others that are comparable in scope, scale, and impact: a. In-kind regrading, graveling, repaving, or other maintenance treatments of all existing trails, walks and paths within existing disturbed alignments. b. Minor realignment of trails, walks, and paths where the ground is previously disturbed as determined by a qualified archeologist. c. Changing the material or color of existing surfaces using materials that are recommended in an approved treatment plan or in keeping with the cultural landscape. d. Construction of water bars following the recommendations of an approved treatment plan or in keeping with the cultural landscape.

3. Repair/Resurfacing/Removal of Existing, Roads, Trails and Parking Areas: The Streamlined Review Process may be used as follows: a. Existing roads, trails, parking areas, and associated features that have been determined not eligible for the National Register in consultation with the SHPO/THPO, may be repaired or resurfaced in-kind or in similar materials as long as the extent of the project, including staging areas, is contained within the existing surfaced areas. The repair or resurfacing cannot exceed the area of the existing road surface and cannot exceed the depth of existing disturbance. b. Existing roads, trails, parking areas, and associated features, that have been determined eligible for the National Register in consultation with the SHPO/THPO, may be repaired or resurfaced in-kind. The project, including staging areas, cannot exceed the area of the existing surface and cannot exceed the depth of existing disturbance. c. Existing surfaced areas may be expanded, or new surfaces constructed if the extent of new surfacing can be demonstrated to occur on land that has been disturbed by prior excavation or construction and has been shown not to contain buried historic properties. New or expanded surface may not be an addition to, or continuation of, existing surfaces that are listed in or eligible for the National Register and all project activities, including staging areas, must be located in non-historic areas to be eligible for streamlined review. d. Existing surfaced areas may be removed if the surfaced area is not a historic property, it is not located within a historic property and all project activities, including staging areas, will occur on land that has been disturbed by prior excavation or construction and has been shown not to contain buried historic properties.”

For undertakings in the Comprehensive Trails Management Plan that meet these criteria, CRNRA will use the NPS NPA and include documentation in the annual report and no additional requirements for Section 106 compliance will be needed.

V. Streamlined Review Activities for the Comprehensive Trails Management Plan

There are several routine and recurrent activities that will have limited or no potential to affect historic properties or unevaluated cultural resources. As a result, portions of implementing the Comprehensive Trails Management Plan that meet this criterion would not require archaeological or historic resources survey and no further consultation with the SHPO, Tribes, other Consulting Parties, or the public will be required. These activities include educational strategies for visitor use management (developing partnerships, press releases, public events, social media, text for status announcements), increasing law enforcement presence, removing existing signage and hazardous rebar and modern debris, clearing (with no ground disturbance) encroaching vegetation along existing trail corridors, replacing existing signage in-kind in the same location, formalizing the volunteer program, cleaning existing culverts and paved surfaces, and redistributing existing parking (repainting existing lots and designating boat parking in existing lots).

Appendix C includes a list of additional streamlined criteria at CRNRA and would be included in an annual report to Consulting Parties (see Section VII of this Programmatic Agreement). No additional Section 106 compliance will be needed.

VI. Avoidance and Minimization

The CRNRA determined that it cannot fully determine that effects on historic properties prior to approval of the Trails Management Plan undertakings. The CRNRA will seek to avoid adverse effects to all types of historic properties, with input from the SHPO, Tribes, and Consulting Parties received during annual consultation meetings and comments during standard Section 106 consultation for all undertakings. Avoidance measures for historic properties may include (but are not limited to) rerouting trail alignments, fencing known sites for protection during construction, monitoring of construction near site areas within a buffer zone, or placing infrastructure outside of site boundaries.

- A. Measures to avoid or minimize potential adverse effects from the undertakings may include, but are not limited to, those that are designed to prevent trail use such as changing the trail or destination location, installing closure signs or physical barriers, and conducting site stabilization efforts. Additional mitigation measures could include historical research, interpretation, photographic documentation, intensive recording, periodic monitoring, and archaeological excavation. Trail and destination designation decisions will also be revisited as necessary.
- B. The CRNRA will continue to dedicate available staff, funding, and other resources to proactively promote and enforce responsible trail uses and ethics. Such efforts will include continuing to support campaigns to reduce vandalism and unauthorized collections of archaeological resources.

VII. Reporting

Each year following the execution of this Programmatic Agreement until it expires or is terminated, the CRNRA shall provide all parties to this Programmatic Agreement a summary

report detailing work undertaken pursuant to its terms. Such report shall include a summary of how this Programmatic Agreement has been implemented during the preceding year; projects completed that met Stipulations III and IV of the Programmatic Agreement, survey work and findings related to the undertaking in the CRNRA's efforts to carry out the terms of this Programmatic Agreement, NPS' assessment of the effectiveness of this Programmatic Agreement, and any recommendations NPS may have for improving the Programmatic Agreement. CRNRA will host an annual consultation meeting virtually or in-person to review report findings and implementation of this Programmatic Agreement.

VIII. Inadvertent Discoveries

- A. If previously unrecorded and/or buried cultural resources are discovered during any portion of a project, or additional unexpected impacts to known resources, work within at least 100 feet will immediately cease, and an assessment will be made by a cultural resource specialist qualified in the applicable discipline in consultation with Parties. The CRNRA will notify SHPO and Tribes and work in that area will not resume until the resources can be identified and documented and an appropriate path forward or mitigation strategy developed and implemented in consultation with SHPO and, as appropriate, Tribes.
- B. In the unlikely event that human remains, funerary objects, sacred objects, or objects of cultural patrimony are discovered during any portion of the project, provisions outlined in the Native American Graves Protection and Repatriation Act (NAGPRA) and the ACHP's Policy Statement Regarding Treatment of Burial Sites, Human Remains and Funerary Objects will be followed. Notification to SHPO and Tribes will occur within 48 hours.

IX. Review and Comment Process

The CRNRA will submit documentation related to the undertaking (e.g., survey reports, Determinations of Eligibility, findings of effect, research design plans, data recovery reports, annual reports, etc.) to the Consulting Parties as applicable for a 30-calendar day review and comment. There may be times when a review of less than 30 calendar days will be requested. If a party does not comment on a submittal during the 30-calendar day period, or other agreed upon review period, as requested, the CRNRA will follow-up by telephone or e-mail with the party. If, after such reasonable and good faith efforts to reach an unresponsive Consulting Party, there has still been no response, the CRNRA will proceed to the next step prescribed by 36 CFR Part 800, the NPS NPA, or this PA as applicable.

X. Communication among Parties to this Programmatic Agreement

Electronic mail (e-mail) may serve as the official correspondence method for all communications regarding this Programmatic Agreement and its provisions.

XI. Curation

The CRNRA shall ensure that all artifacts, samples, and records resulting from the undertaking are curated in accordance with applicable federal and state laws, including 36 CFR Part 79, except as determined through consultations with Tribes.

XII. Confidentiality

To the maximum extent allowed by federal and state law, the CRNRA will maintain confidentiality of sensitive information regarding historic properties that could be damaged through looting or disturbance, and/or to help protect a historic property to which a Tribe attaches religious or cultural significance. However, any documents or records the CRNRA has in its possession are subject to the Freedom of Information Act (FOIA) (5 U.S.C. 552 et. seq.) and its exemptions, as applicable. The CRNRA will evaluate whether a FOIA request for records or documents would involve a sensitive historic property, or a historic property to which a Tribe attaches religious or cultural significance, and if such documents contain information that the CRNRA is authorized to withhold from disclosure by other statutes including Section 304 of the NHPA, as well as the Archaeological Resources Protection Act. If this is the case, then the CRNRA will consult with the Keeper and the ACHP regarding withholding the sensitive information. If a Tribal-sensitive property is involved, the CRNRA will also consult with the relevant Tribe prior to making a determination in response to a FOIA request.

XIII. Dispute Resolution

Should any signatory to this Programmatic Agreement object at any time to any actions proposed or the manner in which the terms of this Programmatic Agreement are implemented, the CRNRA shall notify the signatories and concurring parties of the objection and consult with such parties to resolve the objection. If the CRNRA determines that the objection cannot be resolved, the CRNRA will forward all documentation relevant to the dispute, including the CRNRA proposed resolution, to the ACHP. The ACHP will be requested to provide the CRNRA with its advice on the resolution of the objection within 30 calendar days after its receipt of the relevant documentation. Before reaching a final decision on the dispute, the CRNRA shall prepare a written response that takes into account any timely advice or comments regarding the dispute from the ACHP and any signatories and concurring parties and provide them with a copy of this written response. The CRNRA will then proceed according to its final decision. If the ACHP does not provide its advice regarding the dispute within 30 calendar days, the CRNRA may make a final decision on the dispute and proceed accordingly, after preparing its written response that consider any timely advice or comments and provide the signatories, concurring parties, and the ACHP with a copy of such written response. The CRNRA's responsibility to carry out all other actions subject to the terms of this Programmatic Agreement that are not the subject of the dispute remain unchanged.

XIV. Amendments to the Agreement

This Programmatic Agreement may be amended when such an amendment is agreed to in writing by the signatories. An amendment may be executed in counterparts, each of which shall be deemed an original and all of which together shall constitute one and the same instrument.

The amendment will be effective on the date a copy signed by the signatories is provided to the ACHP.

XV. Termination

If any signatory to this Programmatic Agreement determines that its terms will not or cannot be carried out, that party shall promptly consult with the other signatories to attempt to develop an amendment to the Programmatic Agreement that would avoid termination. If after 30 calendar days (or another time period agreed to by all signatories) an amendment cannot be agreed upon, any signatory may terminate the Programmatic Agreement upon written notification to the other signatories. Once the Programmatic Agreement is terminated, and prior to work continuing on the undertaking, the CRNRA must either (a) execute a Programmatic Agreement pursuant to 36 CFR § 800.6 or (b) request, take into account, and respond to the comments of the ACHP under 36 CFR § 800.7. The CRNRA shall notify the signatories as to the course of action it will pursue.

XVI. Agreement Duration

This Programmatic Agreement will expire if its terms are not carried out within fifteen (15) years from the date of its execution, unless before its expiration the signatories agree in writing to an extension for carrying out its terms. In the event of expiration before completion of all stipulations, the CRNRA shall comply with 36 CFR Part 800 or the NPS Nationwide Programmatic Agreement as applicable, with regard to this undertaking that otherwise would have been covered by this Programmatic Agreement.

EXECUTION

Execution and implementation of this Agreement by the CRNRA, SHPO, The Muscogee Nation and Eastern Band of Cherokee Indians, filing with the ACHP, and subsequent implementation of its terms evidence that the CRNRA has taken into account the effects of this undertaking on historic properties and afforded the ACHP an opportunity to comment.

**PROGRAMMATIC AGREEMENT
AMONG
CHATTAHOOCHEE RIVER NATIONAL RECREATION AREA,
NATIONAL PARK SERVICE,
GEORGIA STATE HISTORIC PRESERVATION OFFICE,
EASTERN BAND OF CHEROKEE INDIANS,
AND THE MUSCOGEE (CREEK) NATION
REGARDING THE PROCESS FOR COMPLIANCE WITH SECTION 106 OF THE
NATIONAL HISTORIC PRESERVATION ACT
FOR UNDERTAKINGS IMPLEMENTED UNDER THE
COMPREHENSIVE TRAIL MANAGEMENT PLAN
HP-210330-002**

SIGNATORIES:

National Park Service

Ann Honious, Superintendent
Chattahoochee River National Recreation Area

Date: _____

**PROGRAMMATIC AGREEMENT
AMONG
CHATTAHOOCHEE RIVER NATIONAL RECREATION AREA,
NATIONAL PARK SERVICE,
GEORGIA STATE HISTORIC PRESERVATION OFFICE,
EASTERN BAND OF CHEROKEE INDIANS,
AND THE MUSCOGEE (CREEK) NATION
REGARDING THE PROCESS FOR COMPLIANCE WITH SECTION 106 OF THE
NATIONAL HISTORIC PRESERVATION ACT
FOR UNDERTAKINGS IMPLEMENTED UNDER THE
COMPREHENSIVE TRAIL MANAGEMENT PLAN
HP-210330-002**

Georgia State Historic Preservation Office



Jennifer Dixon, Deputy State Historic Preservation Office

Date: September 20, 2022

**PROGRAMMATIC AGREEMENT
AMONG
CHATTAHOOCHEE RIVER NATIONAL RECREATION AREA,
NATIONAL PARK SERVICE,
GEORGIA STATE HISTORIC PRESERVATION OFFICE,
EASTERN BAND OF CHEROKEE INDIANS,
AND THE MUSCOGEE (CREEK) NATION
REGARDING THE PROCESS FOR COMPLIANCE WITH SECTION 106 OF THE
NATIONAL HISTORIC PRESERVATION ACT
FOR UNDERTAKINGS IMPLEMENTED UNDER THE
COMPREHENSIVE TRAIL MANAGEMENT PLAN
HP-210330-002**

INVITED SIGNATORIES:

Eastern Band of Cherokee Indians

Richard Sneed, Principal Chief

Date: _____

**PROGRAMMATIC AGREEMENT
AMONG
CHATTAHOOCHEE RIVER NATIONAL RECREATION AREA,
NATIONAL PARK SERVICE,
GEORGIA STATE HISTORIC PRESERVATION OFFICE,
EASTERN BAND OF CHEROKEE INDIANS,
AND THE MUSCOGEE (CREEK) NATION
REGARDING THE PROCESS FOR COMPLIANCE WITH SECTION 106 OF THE
NATIONAL HISTORIC PRESERVATION ACT
FOR UNDERTAKINGS IMPLEMENTED UNDER THE
COMPREHENSIVE TRAIL MANAGEMENT PLAN
HP-210330-002**

Muscogee (Creek) Nation

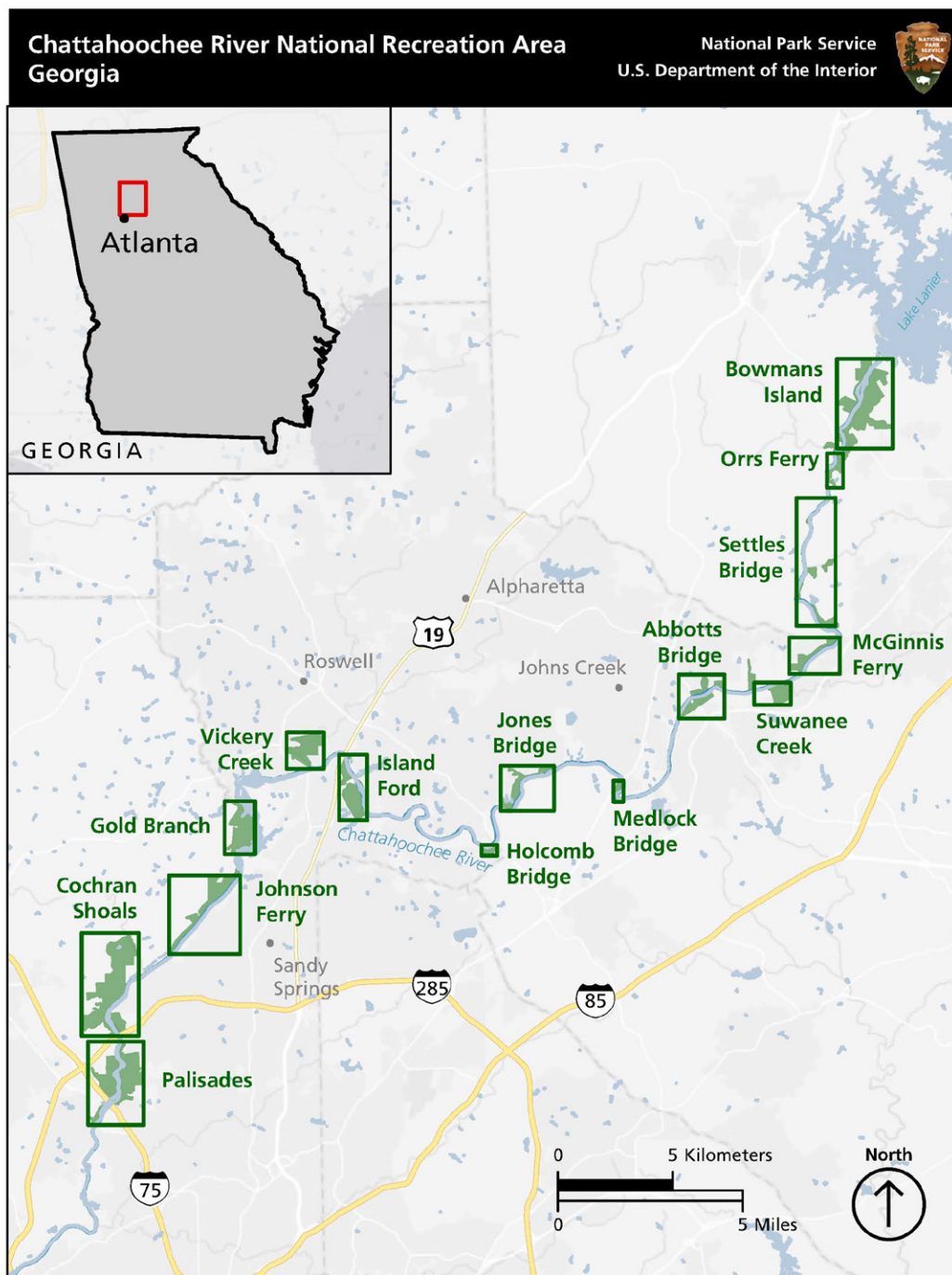


David Hill, Principal Chief

Date: December 8, 2022

APPENDIX A

Area of Potential Effect



APPENDIX B

Chattahoochee River National Recreation Area Resources Determined Eligible during 2007 *Historic Resource Study*

Akers/Banner Mill
Allenbrook
Ivy/Roswell Mill
Sope Creek Ruins Historic District NRIS 73000619
Collins-Yardum House
Hyde Farm
Island Ford Lodge Historic District NRIS 16000747
George Power House NRIS 01000720
Jones Bridge (demolished in 2017)
Settles Bridge
Fish weirs (in river)
John Rogers House
Scribner Company
Johnston's River Line redoubts (outside CRNRA boundaries) NRIS 73000618
Civil War Rifle Pits

Additional Cultural Resource Documentation

Archeological Survey of Cobb-Fulton Counties. Archeological Survey and Investigation in the Metro Atlanta Region and Related Areas of Georgia. Archeological Survey of Cobb-Fulton Counties; 1974.

Braley, Chad O.; Wood, Karen G., and Price, T. Jeffrey. An Archeological and Historical Survey of a Fifteen Acre Tract in Roswell, Fulton County, Georgia. Athens, GA: Southeastern Archeological Services, Inc.; 1992 Jul.

Byrd BW. Sope Creek Ruins: Cultural Landscape Inventory, Chattahoochee River National Recreation Area, National Park Service. Cultural Landscapes Inventory reports. 550155. NPS Southeast Regional Office. Southeast Regional Office/CLI Database, 2009. [DataStore - Published Report - \(Code: 2229825\) \(nps.gov\)](#)

de Baillou, Clemens. Archeological Salvage in the Morgan Falls Basin. Athens, GA: The University of Georgia, Department of Sociology and Anthropology; 1962.

Ehrenhard, Ellen; O'Grady Patricia D., and Toole, Gregory K. Chattahoochee River National Recreation Area Proposed Research Design and Archaeological Overview. Tallahassee, FL: National Park Service, Southeast Archeological Center; 1979.

- Gantt, Mary E. and Howard, Russell W. Phase I Archeological Resources Survey, Vickery Creek Pedestrian Bridge Abutment, Roswell, Georgia. Holly Springs, GA: R.S. Webb & Associates; 2004; Prepared for the City of Roswell.; ARPA Permit No. CHAT-2004-001.
- Gerdes, Marti and Messer, Scott. Chattahoochee River National Recreation Area Historic Resource Study. Historic Resource Study. NPS: Southeast Regional Office. Atlanta, Georgia, 2007. [DataStore - Published Report - \(Code: 2266800\) \(nps.gov\)](#)
- Hamilton, Christopher E. An Archaeological Reconnaissance of the Chattahoochee River Corridor between Buford Dam and Georgia 20 Highway Bridge. Tallahassee, FL: Florida State University; 1974.
- Hardy, Meredith D. Trip Report, describing activities performed while conducting site assessments at Chattahoochee River National Recreation Area (CHAT) for the Corrective Action Plan, May 30-June 9 and June 19-29, 2006. Tallahassee, FL: National Park Service, Southeast Archeological Center; 2006; Prepared for Director, SEAC; SEAC Accession # 2033.
- Hartrampf, Inc. and Office of Jack Pyburn, Architect, Inc. Historic Structure Report: Allenbrook. Historic Structure Report. U.S. Department of the Interior, National Park Service, Southeast Regional Office. Atlanta, Georgia. 2004. [DataStore - Published Report - \(Code: 2191929\) \(nps.gov\)](#)
- Jones, Tommy. George Power House Historic Structure Report. Cobb Landmarks, 1999.
- Jordan, William R. Archeological Survey of Proposed Fuel Reduction Areas, Chattahoochee River National Recreation Area, Cobb, Forsyth, Fulton, and Gwinnett Counties, Georgia. Holly Springs, GA: R.S. Webb & Associates; 2004; Prepared for National Park Service, Chattahoochee River NRA.
- Jordan, William R. Phase I Archeological Survey and Phase II Site Evaluation of the Proposed McGinnis Ferry Road Widening Corridor, Fulton and Forsyth Counties, Georgia. Atlanta, GA: Brockington and Associates, Inc.; 1999 Mar; Prepared for HDR Engineering, Inc., Atlanta.
- Joseph, J. W. and et. al. Phase I Archeological Survey of the Settles Bridge Corridor, Gwinnett County, Georgia. Stone Mountain, GA: New South Associates; 2005; Report submitted to the Jaeger Company, Athens, GA.
Notes: Bookcase #3, Shelf A
- Joseph, J. W. and Hamby, Theresa M. Phase I Survey of the Rottenwood Creek Multi-Use Trail, Cobb County, Georgia. Stone Mountain, GA: New South Associates; 2003; SEAC Accession # 1841; ARPA Permit No. CHAT-2003-001.

Joseph, J. W.; Hamby, Theresa M., and Reed, Mary Beth. Phase I Archeological Survey of the Chattahoochee Water Main Replacement, Chattahoochee River National Recreation Area, Cobb County, Georgia. Stone Mountain, GA: New South Associates; 1995; Submitted to Welker and Associates Inc. Engineers, Marietta, GA; SEAC Accession # 1199.

Joseph, J. W.; Tankersley, William Matthew; Hamby, Theresa M., and Reed, Mary Beth. Phase I Archeological Survey of Buford Highway/SR 20 Corridor, Forsyth and Gwinnett Counties, Georgia. Stone Mountain, GA: New South Associates; 2006 Mar; GDOT Project Nos. PEMSL-0004-00 (430)/BRST-054-1 (63); GDOT P.I. Nos. 00004430/132985.

Komara, Gregory L. Roberts Drive Entrance Road Survey, Island Ford Section, Chattahoochee River National Recreation Area. Tallahassee, FL: Southeast Archeological Center; 1983.

Lawson, Charles F. Archeological Survey of the Cochran Shoals Unit of Chattahoochee River National Recreation Area, Atlanta, GA. Tallahassee, FL: National Park Service, Southeast Archeological Center; 2004; SEAC Accession #1758

Lawson, Charles F. Draft: Archeological Survey of the Cochran Shoals Unit of Chattahoochee River National Recreation Area, Atlanta, GA. Tallahassee, FL: National Park Service, Southeast Archeological Center; 2003; SEAC Accession #1758.

Lawson, Charles F. Research Design for Archeological Investigations of Proposed and Existing Trails in the Cochran Shoals Unit of the Chattahoochee River National Recreation Area. Tallahassee, FL: National Park Service, Southeast Archeological Center; 2001; SEAC Accession #1758.

Lawson, Charles F. Trip report on archeological testing for a proposed sewer line at the Chattahoochee River Environmental Education Center in the Jones Bridge Unit, and a proposed land exchange in the East Palisades Unit, Chattahoochee River National Recreation Area, Atlanta, Georgia, September 13-16, 2004. Tallahassee, FL: National Park Service, Southeast Archeological Center; 2004; Prepared for Director, SEAC; SEAC Accession #1918.

Lawson, Charles F. Trip report on archeological testing of proposed and existing trails in the Cochran Shoals unit of the Chattahoochee River National Recreation Area, Atlanta, Georgia, January 7-18, 2002. Tallahassee, FL: National Park Service, Southeast Archeological Center; 2002; Prepared for Director, SEAC; SEAC Accession #1758.

Ledbetter, Jerald and Braley, Chad O. Archeological Testing of 9FU4 Riverside Road Pump Station, Fulton County Georgia: Management Summary. Athens, GA: Southeast Archeological Services, Inc.; 1991; Prepared for Jordan Jones & Goulding, Atlanta with Ronnie Rogers and Chad O. Braley, Archeological Survey of the Proposed Riverside Road Pump Station and Associated Pipeline Corridors, Roswell, Georgia

- McCleary, A. Brock J, Adams K. Chattahoochee River National Recreation Area Administrative History: A String of Pearls... Too Valuable to Let Go". CHAT 636/177365. NPS. Atlanta, GA, 2022. [DataStore - Published Report - \(Code: 2287571\) \(nps.gov\)](#)
- Moore, Jackson W., Jr. Archeological Surveys of Surplus Properties in the Gold Branch, Palisades, and Powers Ferry Units and Archeological Survey of the Proposed Road Alignments in the Island Ford Unit, Chattahoochee River National Recreation Area, Georgia. Dunwoody, GA; Tallahassee, FL: Southeast Cultural Resource Preservation Center; National Park Service, Southeast Archeological Center; 1986.
- Pluckhahn, Thomas J. Archeological Survey of Proposed Improvements to Abernathy and Johnson Ferry Roads, Fulton and Cobb Counties, Georgia. Athens, GA: Southeastern Archeological Services, Inc.; 2003; Prepared for Georgia DOT, Office of Environment/Location (GDOT Project Nos. STP-9252(6) and STP-9250(1), P.I. Nos. 751300 and 751310; SEAC Accession # 1796.
- Prentice, Guy and Horvath, Elizabeth A. An Assessment of the Archeological Resources at the Morgan Falls West (CHAT-57) Site, Tract 105-26, Land Lots 224 and 279, Bull Sluice District, Chattahoochee River National Recreation Area. Tallahassee, FL: National Park Service, Southeast Archeological Center; 1994; SEAC Accession #1146.
- Rogers, Ronnie H. and Braley, Chad O. An Archeological Survey of the Proposed Riverside Road Pump Station and Associated Pipeline Corridors, Roswell, Georgia. Athens, GA: Southeastern Archeological Services, Inc.; 1991; Prepared for Jordan Jones & Goulding, Atlanta.
- Singley, Katherine. An Assessment of Conservation Needs of the Archeological Collections at the Southeast Archeological Center, Tallahassee, Florida. 2001.
- Smith, Betty A. Archaeological Survey of the Proposed Chattahoochee River Interceptor, Gwinnett County, Georgia. 1985; Prepared for Hensley-Schmidt, Inc. and Gwinnett County Water Pollution Control Department.
- Smith, Phillip E. Aboriginal Stone Constructions in the Southern Piedmont. Athens, GA: The University of Georgia, Department of Sociology and Anthropology, Laboratory of Archaeology; 1962.
- Smithsonian Institution, River Basin Surveys. Appraisal of the Archeological Resources of the Oliver Basin, Chattahoochee River, Alabama and Georgia. Washington, D.C.: Smithsonian Institution, River Basin Surveys; 1959; A Project of the Interagency Archeological and Paleontological Salvage Program.
- Sweeney, Alex; Stallings, F. Patricia, and Gardner, Jeffrey W. Archaeological and Historical Study Report: Morgan Falls Project (FERC #2237), Fulton and Cobb Counties, Georgia. Atlanta, GA: Brockington and Associates, Inc.; 2006.
- Walker, John W. Chattahoochee River NRA: Trip Report on October 8, 1987 Archeological reconnaissance of the proposed route of Gwinnett County's Chattahoochee River

Interceptor across the Suwanee Creek unit. Tallahassee, FL: National Park Service, Southeast Archeological Center; 1987; Prepared for Director, SEAC.

Webb, Robert S.; Bloom, John, and Burns, Leigh. Archeological/Cultural Resources Survey, Proposed Paper Mill Telecommunications Tower Project, Cobb County, Georgia. Holly Springs, GA: R.S. Webb & Associates; 2006; ARPA Permit No. CHAT-2006-002.

Webb, Robert S. and Gantt, Mary E. Archeological Resources Survey, Proposed Improvement of State Route 9/Atlanta Street, Roswell, Fulton County, Georgia. Holly Springs, GA: R.S. Webb & Associates; 1997; Prepared for HNTB Architects Engineers Planners, Atlanta, GA and the City of Roswell DOT; ARPA Permit No. CHAT-1997-002; SEAC Accession # 1339.

Webb, Robert S. and Gantt, Mary E. Phase I Archeological Resources Survey, Grimes Bridge Road at Big Creek Project, Roswell, Fulton County, Georgia. Holly Springs, GA: R.S. Webb & Associates; 1997; Prepared for Pond & Company, Atlanta, Georgia; ARPA Permit No. CHAT-1997-003.

Webb, Robert S. and Helfrecht, Courtney. Archeological/Cultural Resources Survey, Proposed Paper Mill Communications Tower Project, Cobb County, Georgia. Holly Springs, GA: R.S. Webb & Associates; 2005; ARPA Permit No. CHAT-2004-002.

Wise, Drew. Trip report on archeological testing prior to several ground disturbing projects at Chattahoochee River National Recreation Area (CHAT), August 17-August 30, 2009. Tallahassee, FL: National Park Service, Southeast Archeological Center; 2009; SEAC Accession #2262.

Wood, Karen G. An Archeological Survey of the Presumed Location of the First Roswell Factory. Athens, GA: Southeastern Archeological Services, Inc.; 1999; Prepared for the Roswell Historical Society.

Wheeler, Beth. Cultural Landscape Report: Sope Creek Ruins. Cultural Landscape Report. U.S. Department of the Interior, National Park Service, Southeast Regional Office. Atlanta, Georgia, 2009. [DataStore - Published Report - \(Code: 2185528\) \(nps.gov\)](#)

Wheeler Byrd B. Hyde Farm: Cultural Landscape Inventory, Chattahoochee River National Recreation Area, National Park Service. Cultural Landscapes Inventory reports. 550156. NPS Southeast Regional Office. Southeast Regional Office/CLI Database, 2011. [DataStore - Published Report - \(Code: 2195884\) \(nps.gov\)](#)

WLA Studio. Island Ford Lodge: Cultural Landscape Report, Chattahoochee River National Recreation Area, National Park Service. Cultural Landscape Report. U.S. Department of the Interior, National Park Service. Atlanta, Georgia, 2022. [DataStore - Published Report - \(Code: 2290080\) \(nps.gov\)](#)

WLA Studio. Allenbrook: Cultural Landscape Report, Chattahoochee River National Recreation Area, National Park Service. Cultural Landscape Report. U.S. Department of the Interior, National Park Service. Atlanta, Georgia, 2022. [DataStore - Published Report - \(Code: 2290081\) \(nps.gov\)](#)

APPENDIX C

Undertakings Eligible for Streamlined Review Process (in addition to those specified in the 2008 Nationwide Programmatic Agreement)

1. Archaeological monitoring and Phase I testing for unsurveyed areas.
2. During dry weather conditions, repair, maintenance, rehabilitation, and widening of existing trails, paths, sidewalks, and driveways that have been previously surveyed under existing Georgia standards within the last 15 years that have no historic properties. This includes trailheads and access to proposed trail segments. Trail repair includes minor grading (creating knicks and turnpikes) and adding rock armoring to manage water across trails.
3. The removal of vegetation (to maintain trail corridor height) and hazard trees. Vegetation clearing includes overhanging limbs, debris, fallen trees, and invasive plants and must follow CRNRA Best Management Practices, including cutting stumps above ground level and (when possible) leaving cut trees in place for wildlife habitat.
4. Removal of non-historic, non-contributing materials and structures (e.g., boat launch ramps, fences and gates, signs, kiosks, trail structures) in order to restore natural conditions which does not include ground disturbance.
5. Resurfacing, striping, repair, and maintenance of existing roads, road corridors, and parking lots. Work includes installation, repair, maintenance, and replacement of non-electric traffic control devices, guardrails, non-historic culverts, road delineators, and other minor non-historic features on existing roads, road corridors, and parking lots.
6. Maintenance or alteration of existing facilities (including replacement in-situ) less than 50 years old where there will be no ground disturbance (e.g., administrative structures, recreation structures, boat launch ramps). Those over 50 years old will be subject to consultation.
7. Restoration of native vegetation. Non-ground disturbing broadcast seeding, no-till seeding, and spreading mulch for establishment of vegetation.
8. Trash and debris clean-up for any instances of recent trash dumps that are less than 50 years of age. The clean-up and removal of dumps less than 45 years old requires no survey. If a potential historic resource is found during this activity it should be reported to CRNRA cultural resources personnel and included in the annual report (Stipulation VII).
9. Repair, maintenance, and in-kind replacement of non-historic signs, bulletin boards, wayside exhibits, barbecue grills, trash cans, picnic tables, and other minor features.