

Final Environmental Assessment

Proposed Ace Sand Company Park
Fitness Loop Trail and Adventure Path

August 2021

Prepared for:
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Recreation, Parks, Historic and
Cultural Affairs Department
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EXECUTIVE SUMMARY

The City of Roswell (City) is located in Fulton County, Georgia, along the northern bank of the Chattahoochee River. In 2016 the City of Roswell Recreation, Parks, Historic and Cultural Affairs department developed a comprehensive master plan for all the parks and City-owned property along the Chattahoochee River from Georgia (GA) 400 to the Cobb County line. The scope of the master plan included all City property along the river from Don White Memorial Park to Willeo Park. The master plan incorporates plans for Willeo Park, Azalea Park, River Landing, Riverside Park, Ace Sand, and Don White Memorial Park. Ace Sand is the first of these sites to receive design funding to implement this vision.

The Ace Sand tract is approximately 22.7 acres in size and is bounded by Riverside Road to the north, St. Andrew Catholic Church to the west, and Don White Memorial Park to the east. The master plan implementation on the property has been phased based on available funding. The first phase is the design and construction of a Fitness Loop Trail and Adventure Path on the eastern property boundary that connects to an existing trail system on the Don White Park property. The second phase is a Children's Stormwater Garden in the center of the property and a third phase of the master plan calls for a multi-use community building on the western portion of the site. The City applied for a Land and Water Conservation Fund (LWCF) grant to construct the Fitness Loop Trail and Adventure Path. These work elements are to be accomplished with funds from the LWCF grant. An Environmental Assessment (EA) is part of the grant requirements.

The Fitness Loop Trail and Adventure Path includes a series of fitness equipment, stationed in nine nodes, along the larger perimeter pathway around the park, while smaller trails connect through the park's center, creating an immersive, adventurous woodland experience for site users.

This Environmental Assessment reviews the existing environment and how the proposed project may affect the environment in the areas of land use, topography, fish and wildlife, vegetation, geology and soils, mineral resources, air and water quality, noise, water resources/hydrology, historic/archaeological/cultural resources, transportation access, and socio-economic characteristics. The Draft Environmental Assessment was made available for public comment on June 2, 2021. Comments were received through July 6, 2021. The public comments and responses are provided in Appendix D.

The proposed LWCF grant to implement the Fitness Loop Trail and Adventure Path is the most beneficial use of the site because it will provide an outdoor recreation experience for all ages and skill levels. It will provide opportunities for active fitness programs as well as passive pedestrian users. It will convert an under-utilized part of the City's park infrastructure and be a catalyst for future phases of the master plan. In addition, the Fitness Loop Trail and Adventure Path can be constructed with minimal long-term negative effects to the surrounding environment, and the proposed project's invasive species removal coupled with the meadow and forest restoration will provide a long-term, direct, beneficial effect.

TABLE OF CONTENTS

	<u>Page</u>
I. DESCRIPTION OF THE PROPOSED PROJECT	1
LOCATION OF PROPOSED PROJECT	1
PROJECT DESCRIPTION	1
BENEFITS OF THE PROPOSED PROJECT	2
OTHER KNOWN FEDERAL, STATE OR LOCAL PROJECTS	2
OBJECTIVES OF ENVIRONMENTAL ASSESSMENT/NEED FOR DECISION	2
II. EXISTING ENVIRONMENT	6
LAND USE	6
TOPOGRAPHY	6
FISH AND WILDLIFE	6
VEGETATION	8
GEOLOGY AND SOILS	8
MINERAL RESOURCES	8
AIR AND WATER QUALITY	9
NOISE	10
WATER RESOURCES/HYDROLOGY	10
HISTORIC/ARCHAEOLOGICAL/CULTURAL RESOURCES	11
TRANSPORTATION ACCESS	13
SOCIO-ECONOMIC CHARACTERISTICS	13
III. ENVIRONMENTAL EFFECTS	15
METHODOLOGY FOR ASSESSING IMPACTS	15
LAND USE	16
TOPOGRAPHY	16
FISH AND WILDLIFE	17
VEGETATION	18
GEOLOGY AND SOILS	18
MINERAL RESOURCES	18
AIR AND WATER QUALITY	19
NOISE	19
WATER RESOURCES/HYDROLOGY	20
HISTORIC/ARCHAEOLOGICAL/CULTURAL RESOURCES	20
TRANSPORTATION	21
SOCIO-ECONOMIC CHARACTERISTICS	21
IV. SUMMARY	22

List of Figures

Figure 1. Site Location Map	4
Figure 2. Topography	5

List of Tables

Table 1. Summary of Environmental Effects	15
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Appendices

Appendix A – Ace Sand Fitness Loop Trail and Adventure Path – Concept Plan	
Appendix B – USFWS Information for Planning and Consultation (IPaC) Correspondence	
Appendix C – Phase I Cultural Resource Survey Report and HPD Correspondence	
Appendix D – Public Comments and Responses	

I. DESCRIPTION OF THE PROPOSED PROJECT

Location of Proposed Project

The City of Roswell (City) is in Fulton County, Georgia, along the northern bank of the Chattahoochee River. In 2016 the City of Roswell Recreation, Parks, Historic and Cultural Affairs department developed a comprehensive master plan for all parks and City-owned property along the Chattahoochee River from Georgia (GA) 400 to the Cobb County line. The scope of the master plan included all City property along the river from Don White Memorial Park to Willeo Park. The vision statement of the master plan is *“to transform the City’s riverfront property into a unified first-class river park system that provides access to, enjoyment of, and appreciation for the river.”*

The 2016 master plan establishes a vision for approximately 3.3 miles of waterfront public spaces along the northern bank of the Chattahoochee River, including six city-owned facilities. The master plan incorporates plans for Willeo Park, Azalea Park, River Landing, Riverside Park, Ace Sand, and Don White Memorial Park. Ace Sand is the first of these sites to receive design funding to implement this vision.

The Ace Sand tract lies just west of Don White Park and is shown on Figure 1. The remaining park properties included in the master plan are shown on Figure 2. The Ace Sand property is located within the South Atlantic-Gulf Unit Code 03130001 of the Upper Chattahoochee River Basin, according to the 1974 Hydrologic Unit Map of Georgia. It is shown on the Fulton County United States Geological Survey (USGS) 7.5-minute topographic map (Figure 2). It is approximately 22.7 acres in size and is bounded by Riverside Road to the north, St. Andrew Catholic Church to the west, and Don White Park to the east.

Project Description

The City of Roswell purchased the site in 1999 from the Ace Sand Company, which operated a sand dredging and processing operation on the site since the late 1950s. The site also was the homestead of the Ace Sand operators, with several outbuildings located on the property. The master plan implementation on the property has been phased based on available funding. The first phase is the design and construction of a fitness loop trail and adventure path on the eastern property boundary that connects to an existing trail system on the Don White Park property. The second phase is a Children’s Stormwater Garden in the center of the property and a third phase of the master plan calls for a multi-use community building on the western portion of the site. The fitness loop trail and adventure path are the work elements to be accomplished with funds from the Land and Water Conservation Fund (LWCF) grant.

The Fitness Loop Trail and Adventure Path concept is included in Appendix A. A series of various types of fitness equipment will be stationed in ten nodes along the larger perimeter pathway, while smaller trails will connect through the park's center, creating an immersive, adventurous woodland experience for site users.

Roswell's signature Riverwalk runs adjacent to Riverside Drive through the Ace Sand site. One segment of the pathway branches towards the river on the eastern end of the site, adjacent to Don White Park. A gravel path, which provides maintenance access for a sewer line, runs parallel to the river. These two paths form the basis of the Fitness Loop Trail.

Areas that were previously used as dredge stockpile areas are currently overgrown with invasive species such as privet (*Ligustrum sinense*), mimosa (*Albizia julibrissin*), and kudzu (*Pueraria montana*). These areas will undergo invasive species removal and be reforested with native species such as loblolly pine (*Pinus taeda*), red maple (*Acer rubrum*), boxelder (*Acer negundo*), green ash (*Fraxinus pennsylvanica*), river birch (*Betula nigra*), and sycamore (*Platanus occidentalis*) to match the existing floodplain woodlands. The proposed Adventure Trail will meander through these areas as well as open areas proposed for replanting and reclamation as meadows within the interior of the park. Future work along the Chattahoochee River is planned to stabilize areas of the riverbank that are currently eroding; however, the stream bank restoration is not part of the LWCF grant. The proposed locations of the fitness equipment and restoration areas are shown on the concept layout in Appendix A. This graphic also shows the fitness loop and adventure trail and how these new facilities will tie into the proposed facilities in Phase 2.

Designs for the Fitness Loop Trail (Phase 1) and Children's Stormwater Garden (Phase 2) will be completed by summer of 2021. Construction may begin as soon as the summer of 2021, depending on funding availability.

Benefits of the Proposed Project

The primary benefit of the Fitness Loop Trail and Adventure Path are increased outdoor recreational opportunities for people of all ages and abilities within the community. A completed trail system in this portion of the park will provide access to, enjoyment of, and appreciation for the river. In addition, invasive species removal and meadow and forest restoration activities will enhance the park setting while providing increased wildlife habitat and greenspace enhancements. The Fitness Loop Trail and Adventure Path will provide for improved pedestrian circulation throughout the park and connect to future phases within the Ace Sand parcel.

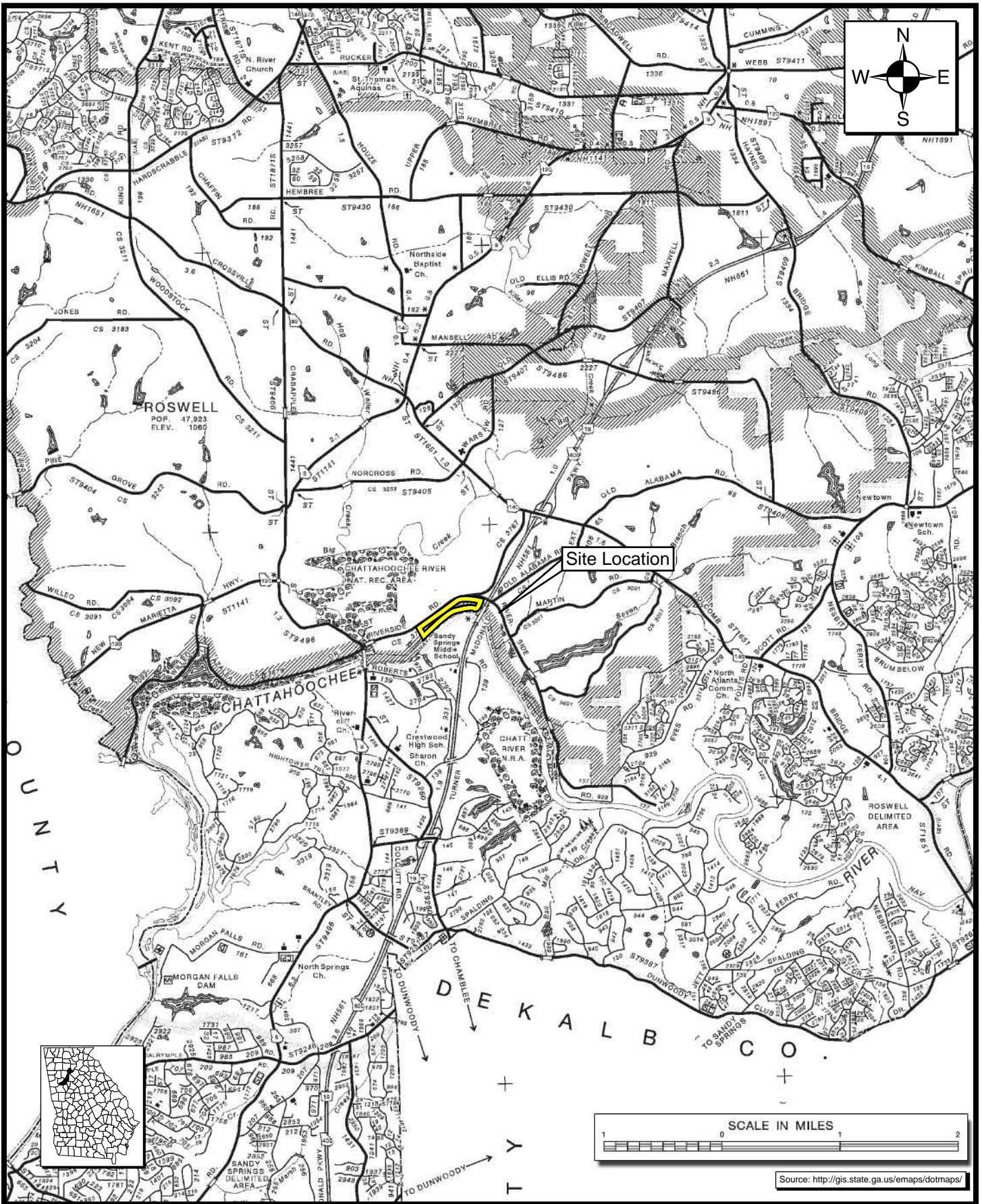
Other Known Federal, State or Local Projects

As previously stated, the Fitness Loop Trail and Adventure Path is the first phase of a three phased implementation of ACE Sand Park, as recommended in the City's park masterplan. Future phases are contingent upon securing funding sources for design and construction. There are currently no other known federal or state projects related to the Ace Sand project.

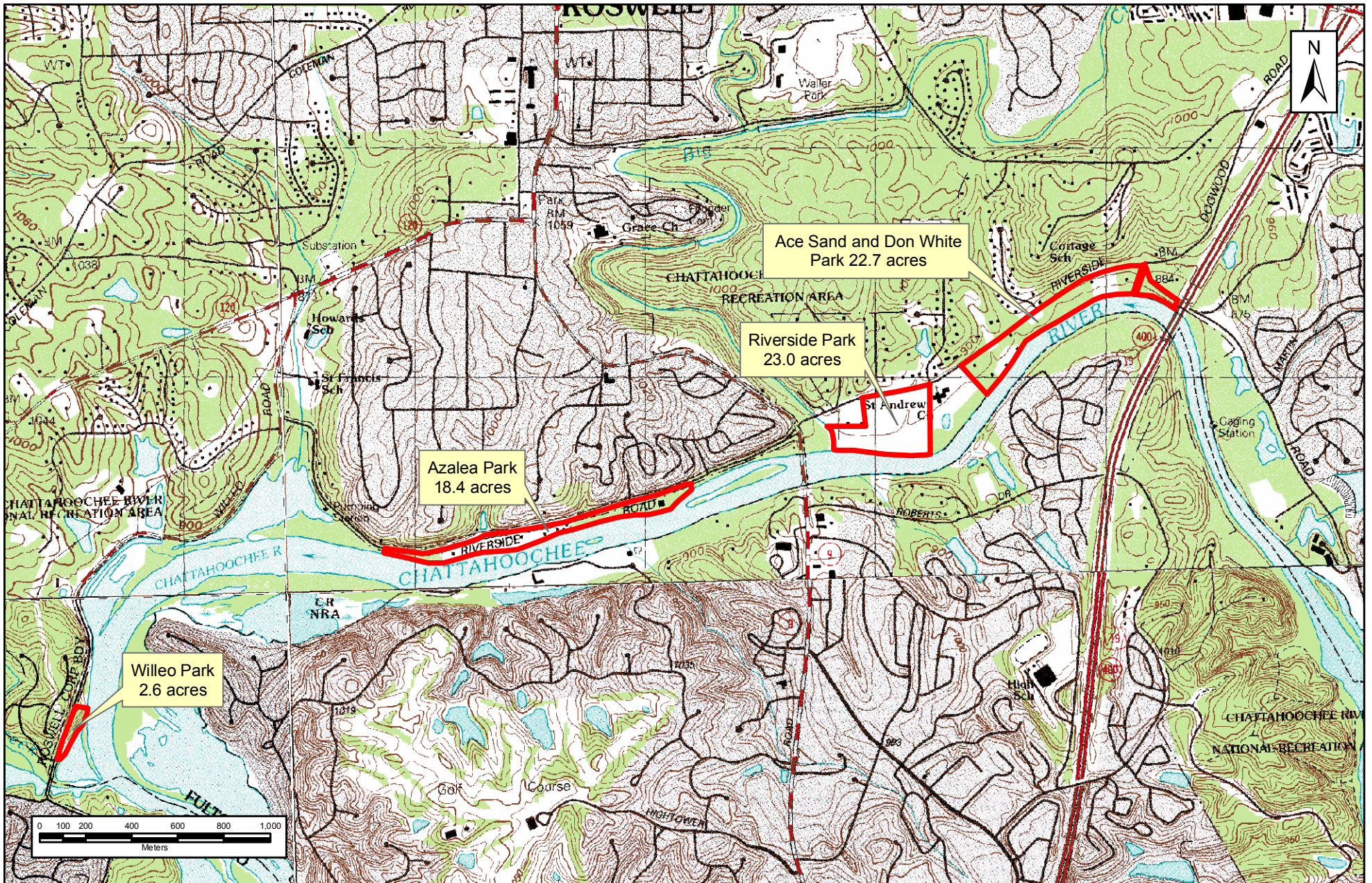
Objectives of Environmental Assessment/Need for Decision

This document, an Environmental Assessment written pursuant to the National Environmental Policy Act (NEPA), will analyze the environmental effects of the

proposed project. The main objectives of the proposed project are: 1) to design and construct a Fitness Loop Trail and Adventure Path within the Ace Sand park, and 2) to remove invasive species and restore meadow and forest habitats within the Ace Sand park. The environmental assessment is required as a condition of the LWCF grant approval. The existing site conditions are described in Section II and an analysis of the direct and indirect changes to the environment resulting from the proposed project are included in Section III.



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10111-019_figure2.mxd

City of Roswell, Georgia
Chattahoochee Parks Master Plan

August 2021



Topography

Figure 2

II. EXISTING ENVIRONMENT

This section describes the characteristics of the existing environment at the Ace Sand park site. The discussion that follows focuses on the conditions currently present and what conditions could be in the future if the project is not funded.

Land Use

The City purchased the Ace Sand site in 1999 from the Ace Sand Company, who operated a sand dredging and processing operation on the site since the late 1950s. The Ace Sand Company continued to lease the property back from the City as they continued their operation until finally vacating the site a few years ago. The site was also the homestead of the Ace Sand operators, with several outbuildings still located on the property. The outbuildings are currently used by City staff as maintenance offices and storage buildings. The eastern side of the site, where the original home was located, is characterized by large trees and maintained lawns. The central portion of the site, where the bulk of the dredging operations occurred, is intensely disturbed and heavily compacted and currently acts as an overflow parking lot. The western side of the site is comprised of a combination of excess dredged spoils associated with the former industrial operations and floodplain woodlands. These areas have been colonized by invasive species like privet, mimosa, and kudzu.

The site could potentially be used for future parking or development of a restaurant or other regional destination if the area is not preserved as a park.

Topography

The Ace Sand property is located adjacent to the Chattahoochee River and within the floodplain of the river. The topography slopes gently from Riverside Road to the river. A site topographic map is include on Figure 2. Areas within the park that are elevated above the floodplain are typically dredge stockpiles and are composed of silt and sand dredged from the river.

Fish and Wildlife

Frequent and high flow variability within the Chattahoochee River has led to low habitat diversity, and subsequently, lower fish population diversity in the river. Shallow, slow shoreline habitats, which have been found to be the prime habitat for most fish species, are greatly reduced under these conditions.

The cold water regime has allowed the formation of a secondary trout fishery (i.e., sustained via regular stocking) in the river for approximately 50 miles below the dam (essentially Buford Dam to Peachtree Creek). This section of the Chattahoochee River is one of the southernmost trout fisheries in the nation. Harvestable-size brook, brown and rainbow trout have been stocked since 1957, and the area has been managed as a trout fishery since 1960. The project area is managed as a put-grow-and-take trout fishery with annual stockings of brown and rainbow trout. Native warm water fish do not maintain a significant fishery in this section because of the altered thermal regime.

The Ace Sand tract and surrounding parcels support a wide variety of small mammals, including beaver, squirrel, rabbit, mink, opossum, and fox. Common large mammals, such as deer find habitat within wooded portion of the park. Reports of coyotes occurring in metropolitan Atlanta provide some evidence that these predators may be moving into urban areas.

Several turtle species currently utilize the river, such as the yellowbelly slider (*Trachemys scripta scripta*) and the Eastern river cooter (*Pseudemys concinna concinna*). Eastern box turtles (*Terrapene carolina*) and a few lizards and snakes, such as the green anole (*Anolis carolinensis*) and the Northern brown snake (*Storeria dekayi*) occupy the park as well.

Migratory Birds

The proposed project area is one of the key Audubon sites in the metro Atlanta area for spring and fall migration. Scientists commonly agree that more than 180 neotropical songbird species such as tanagers, warblers, vireos, and thrushes depend on southern forests for nesting and breeding ground. Unfortunately, these migratory bird populations have declined significantly over the past few decades. This decline can be attributed primarily to habitat loss associated with human development activities. The Chattahoochee River is utilized by migratory species as a major traveling corridor, with many birds stopping to roost or to feed in the areas along the river banks. Some migratory birds with non-specific habitat requirements may nest in the park.

At the height of migration, the species in the vicinity of the park sites total in the high sixties, with occasional sighting of olive-sided flycatcher, Lincoln's sparrow and the Connecticut warbler. Wood ducks, herons, and woodpeckers (excluding the federally endangered Red-cockaded Woodpecker) may also be found within the park site (<http://www.atlantaudubon.org>).

Protected Species

An office review of available resources was performed to develop a list of potential protected species within the Ace Sand park site. The list of known protected species was compiled from the United States Fish and Wildlife Service (USFWS), Information for Planning and Consultation (IPaC) database. The IPaC list is included in Appendix B. No known protected species are listed as potentially occurring with the project area.

Adult bald eagles find habitat along coastal waterways and major rivers, wetlands, and reservoirs in North America. The eagles often nest in mature, open-topped pines near large bodies of water. The nests are reused each year and can become very large over time. Bald eagles are recognized by their dark brown body and contrasting white head and tail. Adult bald eagles have been spotted in the project area by Chattahoochee Nature Center staff as well as NPS biologists. It is possible that eagles may use the Chattahoochee River corridor as foraging habitat. No bald eagles have been observed nesting within the Ace Sand park property.

Vegetation

A small portion of this area is comprised of mature riparian forest with a recreational trail and a sewer easement that follows the gradient of the Chattahoochee River. The mature riparian forest is dominated by box elder, sweet gum (*Liquidambar styraciflua*), red mulberry (*Morus rubra*) river birch, tulip poplar (*Liriodendron tulipifera*), red maple, and loblolly pine. The midstory is dominated by Chinese privet interspersed with woody vines including Japanese honeysuckle (*Lonicera japonica*), poison ivy (*Toxicodendron radicans*), and muscadine grape (*Vitis rotundifolia*). Herbaceous vegetation is dominated by ebony spleenwort (*Asplenium platyneuron*), netted chain fern (*Woodwardia areolata*), and young Chinese privet saplings. The sewer easement along the forested riparian buffer remains in a secondary ecological successive state with young pines (*Pinus* sp.), river birch saplings, and soft rush (*Juncus effusus*) comprising the vegetative communities.

Geology and Soils

The Ace Sand park is located within the Chattahoochee River floodplain, which flows along the Brevard Fault through the piedmont province of Georgia. The U.S. Department of Agriculture Soil Survey of Fulton County, Georgia, details the soils within the project areas as the Toccoa-Cartecay Association, alluvial soils along floodplains. The Toccoa-Cartecay soils are well-drained or somewhat poorly-drained, nearly level soils with usually a depth of 15-30 inches to the water table, which are flooded once within five to twenty years.

Tocca series soils are described by the U.S. Department of Agriculture as deep, well-drained sandy loam, silty clay loam, loamy sand, or sand soils located within narrow to broad first bottoms of streams, in depressions near heads of drainage ways, and at the base of slopes on uplands. The first soil layer of Toccoa soils is 4-12 inches thick, dark brown sandy loam, loamy sand, or loam with moderate to low organic matter content and low natural fertility. These soils are often on 0-2% slopes, and flood less frequently along the Chattahoochee River than other smaller streams. Typically, these soils surround the Chattahoochee River, and they are the most common soil type throughout Ace Sand park.

Within the dominant Tocca soils, pockets of Cartecay series, silty variant soils occur. These Cartecay soils are deep, somewhat poorly drained soils located within floodplains. The surrounding areas are typically 0-2% slopes with slow runoff. The surface layer is about five inches thick of dark brown silt loam with the second soil layer of 11-inch thick silt loam. The soil has low natural fertility, and organic matter is moderate. These soils are subject to stream overflow once or twice a year lasting 2-7 days; however, areas along the Chattahoochee River experience overflow less often. The Cartecay series silty variant soils occur onsite in scattered pockets throughout the park site.

Mineral Resources

The mineral resources within the Ace Sand park are isolated to the dredge material previously removed from the Chattahoochee River. This material was used for a wide

variety of uses, including concrete mix and other construction materials. The majority of the dredge material has been removed from the site, but a few pockets of historic spoil areas remain within the park. In addition, the sand continues to deposit in this area of the river as the water velocity slows as it approaches Bull Sluice Lake. The heavier sediment particles deposit within the river and create sand bars within the river channel.

Air and Water Quality

Air Quality

The City of Roswell has a responsibility to protect air quality under the Clean Air Act (CAA). The Ace Sand park site is located within one of the most rapidly developing areas in the United States. Metropolitan Atlanta air emissions generated by the large volumes of cars, trucks, and aircraft traffic in Atlanta have resulted in frequently poor air quality within the parklands adjacent to the Chattahoochee River. According to the EPD, Metro-Atlanta has not met the National Ambient Air Quality Standards for ground-level ozone since monitoring began in 1980. Due to this failure to meet the standards for air quality, the Metro-Atlanta area is designated as a “non-attainment” area. However, the area is in compliance with all other National Ambient Air Quality Standards.

Federal ambient air quality standards for ozone, carbon monoxide, nitrogen dioxide, sulfur dioxide, respirable particulate matter smaller than 10 microns, and lead are tracked yearly for Fulton County. Vehicle emissions are the primary source for these pollutants. Areas not in compliance with the national ambient air quality standards are termed “non-attainment” areas. Attainment of the national ambient air quality standards is determined through continuous ambient monitoring.

Current air quality in Fulton County, which includes the Ace Sand park, is monitored by the EPD Air Protection Branch through a network of fourteen monitoring sites, including seven that monitor ozone. Recent measurements show that the Fulton County area continues to achieve compliance with the national ambient air quality standards for all six criteria pollutants except for ozone.

Water Quality

The watershed of the Chattahoochee River is relatively long and narrow, which allows stormwater to reach the river quickly through overland sheet flow and via perennial and/or intermittent streams. This, combined with the fact that these areas are surrounded by urban and suburban developments, results in a major potential for soil erosion during storm events within the Ace Sand park site.

The flow of the Chattahoochee River is dominated by controlled releases from Buford Dam, which was constructed in 1957 and is managed by the Mobile District, USACE. Flow in the river is also affected significantly by storm events that contribute large amounts of water to the river via overland flow and from the major tributaries. The USACE is required to maintain a minimum flow of 750 cubic feet per second (cfs) at all times in order to maintain water quality, to protect aquatic life in the river, and to

provide electrical power during peak demand periods. Water is released from the dam in variable amounts according to a schedule regulated by the USACE. These releases are designed to provide “peaking” power for the area electrical grid, the surges of which create rapid and large variations in water levels and current velocities downstream of Buford Dam. These surges have resulted in significant erosion of the riverbanks for as far as 20 miles downstream, significant widening of the river, and an increase in the number of trees falling into the river. Releases from Buford Dam, therefore, have a major influence over water levels at the City’s river parks.

Water quality of the Chattahoochee River and tributary streams has been and continues to be affected by various sources of point and nonpoint source pollution. Water quality in the Chattahoochee River and its tributaries is protected under law by Georgia’s water use classifications and standards, applied to Georgia’s interstate waters in 1972. These regulations include standards for fecal coliform bacteria, dissolved oxygen, pH and temperature for drinking water, recreation and fishing. The Georgia Rules and Regulations for Water Quality Control, Chapter 391-3-6-.03, Water Quality Standards, established standards for toxic materials, including metals and other inorganic compounds, toxic priority pollutants, pesticides and herbicides.

Section 305(b) of the Clean Water Act requires each state to submit an annual report that identifies waters in the state that do not meet their “designated” uses. Waters of the Chattahoochee River within the Ace Sand park are designated as being suitable for “drinking water, recreation, and fishing.” The 2020 303(d) list includes the section of the Chattahoochee River from Johns Creek to Morgan Falls Dam as not supporting the designated use of Recreation/Drinking Water because of E. coli, fecal coliform, and PCBs in fish tissue.

Noise

Riverside Road runs along the northern edge of the park. Additionally, the proposed project area is located within close proximity to GA 400, which is becoming a major thoroughfare in Atlanta. No formal noise surveys have been conducted in this area; however, traffic noises can be heard in the project areas at all times of day. Given the numerous housing developments adjacent to the project areas to the north, sounds made by lawnmowers, leaf blowers, and construction noise is common within the Ace Sand park. Very little noise occurs within the parks themselves, other than vehicle noise in parking areas and voices of children playing.

Water Resources/Hydrology

The term ‘Waters of the United States’ has broad meaning and incorporates both deepwater habitats and special aquatic sites, including wetlands (Federal Register 1982) as follows:

- a. The territorial seas with respect to the discharge of fill material.
- b. Coastal and inland waters, lakes, rivers, and streams that are navigable waters of the United States, including their adjacent wetlands.

- c. Tributaries to navigable Waters of the United States, including adjacent wetlands.
- d. Interstate waters and their tributaries, including adjacent wetlands.
- e. All other waters of the United States not identified above, such as isolated wetlands and lakes, intermittent streams, prairie potholes, and other waters that are not a part of a tributary system to interstate waters or navigable waters of the United States, the degradation or destruction of which could affect interstate commerce.

The Clean Water Act of 1977 (33 U.S.C. s/s 1251 et seq.) and Executive Order 11980 identify wetlands as national natural assets. These orders direct federal agencies to avoid the occupation, adverse modification, or degradation of wetlands.

Wetlands play numerous important roles in maintaining the quality of adjacent riverine systems. They provide natural flood and erosion control, help maintain water quality, and provide important wildlife habitat.

None of the areas for which trail construction is proposed contain any jurisdictional wetlands within the proposed construction footprints. A jurisdictional wetland is one that is determined to be a “water of the United States” as defined by the United States Army Corps of Engineers (USACE) “Routine On-Site Method” (Three Parameter Method) (USACE 1987). In addition, each wetland was classified according to the Cowardin classification system developed by the National Wetlands Inventory for the USFWS. The following describes the wetlands and waters that occur within the Ace Sand park site

Two small wetland areas and four jurisdictional streams originating from culverts along Riverside Road currently drain water from nearby uplands through the site and into the Chattahoochee River. Water volumes vary based on season and rainfall. The largest such channel is an intermittent stream that bisects the site. The historic alignment of the stream was channelized and culverted by the Ace Sand Company and is currently in poor condition. There is an opportunity to improve both hydrologic and ecologic function by diverting the stream to a constructed wetland and enhancing the existing channel with a series of step pools for water quality treatment in larger rainfall events when the diversion is bypassed. This is included in the work proposed for Phase 2 of the master plan. Two of the other three channels are in poor condition and require restoration as well. The other is functioning well hydrologically, and is one of the more beautiful locations on the site. It will be preserved and enhanced as a park feature.

Historic/Archaeological/Cultural Resources

In the National Historic Preservation Act (NHPA) of 1966, Congress declared that "the historical and cultural foundations of the Nation should be preserved as a living part of our community life and development in order to give a sense of orientation to the American people." Passed in response to the destruction of historic and prehistoric resources by federally sponsored actions such as highway construction, water impoundments, and urban renewal, the act requires federal agencies to

establish programs for evaluating and nominating properties to the National Register of Historic Places (NRHP) and to consider the effects of their undertakings on listed or eligible properties.

Section 106 of the NHPA mandates that federal agencies take into account the effects of their actions on properties listed or eligible for listing in the National Register and give the Advisory Council on Historic Preservation a reasonable opportunity to comment.

All parks, including those established primarily for their natural or recreational resources, have responsibilities to identify historic properties potentially affected by undertakings. (For Section 106 purposes, historic properties are defined as prehistoric and historic districts, sites, buildings, structures, and objects listed or eligible for inclusion in the National Register. Cultural landscapes and archeological and ethnographic resources that meet Register criteria are included.)

Properties identified in the area of potential effect must be evaluated according to the National Register criteria, in consultation with the State Historic Preservation Office (SHPO). Generally speaking, if the SHPO and an agency agree in writing that a property is eligible or not eligible, that judgment is sufficient for Section 106 purposes. If there is disagreement, the park requests a formal determination of eligibility from the Keeper of the National Register. Procedures for that process are in 36 CFR Part 63, "Determinations of Eligibility for Inclusion in the National Register of Historic Places," and are referenced in 36 CFR 800.4.

If no historic properties are found in the area of potential effect, the NPS must provide the SHPO and interested persons with documentation of this finding. (See the Advisory Council's *Identification of Historic Properties: A Decision-Making Guide for Managers* for more guidance.)

Existing and potential cultural resources located within the Ace Sand park boundaries will be addressed as required under the terms of the NHPA, NEPA, and the NPS.

R.S. Webb & Associates conducted a Phase I archaeological survey of the Ace Sand property in May 2006. The survey included a literature review and a cultural resources field survey of the areas of potential effect (APE).

Literature Review

At the Georgia Archaeological Site Files located at the University of Georgia in Athens (UGA), the official files and maps were examined, followed by a review of the pertinent site forms and the Laboratory of Archaeology manuscript/report files. At the GDNR Historic Preservation Division (HPD) in Atlanta, pertinent compliance document files, official maps, and National Register of Historic Places (NRHP)-pending files were reviewed, along with Fulton County historic structures survey files. Historic maps, early aerial photographs, and relevant land lottery plats were examined

at the State Archives in Morrow and the University of Georgia, Athens Science Library. The *Official Military Atlas of the Civil War* (Davis *et al.* 1983) and *The Campaign for Atlanta* (Scaife 1993) were also consulted.

Review of records at the Georgia Archaeological Site Files revealed that six previously recorded sites, 9CO86, 9CO87, 9FU3, 9FU5, 9FU25 and 9FU228, are located near the Ace Sand park tract. No sites are located within the Ace Sand park boundaries. The Phase I Cultural Resources Survey Report is included in Appendix C. Review of the files at the HPD revealed that no NRHP listed/eligible structures are located within or immediately adjacent to any of the areas proposed for construction. Correspondence from HPD is also included in Appendix C.

Cultural Resources Field Survey

The field survey was designed to determine the presence or absence of archaeological resources within the Ace Sand park site, and to assess their significance based on NRHP criteria. The field team surveyed the project areas using surface and subsurface techniques to search for archaeological resources. Exposed surfaces within the project areas were inspected for artifacts and surface features. For large areas of surface exposure, the survey team walked zig-zag patterns to maximize the recovery of surface artifacts. Subsurface techniques included the excavation of 30 by 30 centimeter (cm) screened shovel tests until sterile subsoil was encountered. The shovel test profiles were inspected and recorded. Shovel tests were excavated at intervals no greater than 30 meters apart.

Shovel testing and surface examination were conducted in the Ace Sand park. The results of the survey for each park are presented below.

The areas surveyed in the Ace Sand tract were locations along the river where future river access points may be proposed. No archaeological resources were identified as a result of shovel testing and surface examination in the areas surveyed.

Transportation Access

The Ace Sand park is currently accessed from Riverside Road located along the northern property boundary. The park can also be accessed by the existing trail along the road. Pedestrian and bicycle traffic can access the park from parking areas at other parks located along the river.

Socio-Economic Characteristics

Aesthetic Resources

The park areas adjacent to the 48-mile stretch of the Chattahoochee River, encompassing the Chattahoochee River National Recreation Area (CRNRA) and various other city and county parks, represents a large portion of the protected land and greenspace within the Metro-Atlanta area. Large single-family homes and associated urban development surround the Ace Sand park. Because of this, the habitat within the park is prized by local residents as ‘natural areas;’ however, there is very little unaltered natural habitat within the Ace Sand park.

The floodplain of the Chattahoochee River, prior to the influence of agricultural and urban development, would have been forested with mixed bottomland hardwood species. Stream channels would have been aligned with a diverse array of native trees, shrubs and wildflowers. The existing condition within the Ace Sand park parcel, although aesthetically pleasing, does not reflect the beauty of a true natural area, undisturbed by human activities.

Recreation Resources

The City of Roswell utilizes Ace Sand park and the adjacent parks for a wide variety of recreation activities, including the Riverside Sounds concert series, canoe and kayak rental facilities, and numerous festivals and other public gatherings. Non-motorized boating activities are very popular along the river banks of these parks as well. Passive individual recreation opportunities, such as hiking, jogging, bird watching and fishing, are also commonly enjoyed by local residents and visitors to these areas.

III. ENVIRONMENTAL EFFECTS

Methodology for Assessing Impacts

This section discusses the potential environmental effects of the Fitness Loop Trail and Adventure Path. Applicable and available information on known natural and cultural resources was compiled. Surveys for natural and archaeological resources were conducted. Alternatives were evaluated for their effects on the resources and values determined during the scoping process. The impact analyses were based on professional judgment using information provided by City staff, design professionals, relevant references and technical literature citations, and subject matter experts. For each impact topic, the analysis includes a brief description of the affected environment and an evaluation of effects. Potential impacts are described in terms of type (beneficial or adverse), context (site-specific, local or regional), duration (short-term or long-term), and intensity (negligible, minor, moderate or major impairment) of the Ace Sand park's resources.

When appropriate, mitigation measures have been identified that may be employed to offset or minimize potential adverse impacts. Definitions of intensity levels varied by impact topic, but for all impact topics, the following definitions were applied:

Beneficial: A positive change in the condition or appearance of the resource or a change that moves the resource toward a desired condition.

Adverse: A change that moves the resource away from a desired condition or detracts from its appearance or condition.

Direct: An effect that is caused by an action and occurs in the same time and place.

Indirect: An effect that is caused by an action but is later in time or farther removed in distance and is still reasonably foreseeable.

Short-term: An effect that, within a short period of time, would no longer be detectable as the resource is returned to its pre-disturbance condition or appearance. Short-term impacts, depending on impact topic, may range from a few hours up to five years.

Long-term: A change in a resource or its condition that does not return the resource to pre-disturbance condition or appearance and for all practical purposes is considered permanent.

Table 1 provides a brief overview of the environmental effects discussed in the previous section.

Table 1. Summary of Environmental Effects.

Resource Type	Implementation of the proposed Fitness Loop Trail and Adventure Path
Land Use	Long term, direct, beneficial effect.
Topography	Short term, direct effect.
Fish and Wildlife	Localized, Direct Effect to wildlife; Long-term Beneficial Effect
Vegetation	Negligible, direct, Long-term, Beneficial Effect
Geology and Soils	Negligible, Short-term, Direct Adverse Effect; Major, Long-term, Beneficial Effect
Mineral Resources	No Adverse Effect
Air Quality	No Adverse Effect
Water Quality	Negligible, Short-term, Adverse Effect; Minor, Long-term, Direct Beneficial Effect
Noise	Negligible Short-term Direct Adverse Effect; Long-term, No Adverse Effect
Water Resources/Hydrology	Negligible, Long-term, Indirect, Beneficial Effect
Historic/Archaeological/Cultural Resources	No Adverse Effect
Transportation	No Adverse Effect
Socio-economic Characteristics	Long-term, Localized, Direct, Beneficial Effect

Land Use

The proposed Fitness Loop Trail and Adventure Path will not alter the current land use within the Ace Sand park property. The 2016 Parks Masterplan identifies this area for recreational opportunities and the site currently has a multi-use trail and soft surface pedestrian trail within the park. The Fitness Loop Trail and Adventure Path would improve and connect these resources. Planned invasive species removal coupled with meadow and forest restoration activities will positively benefit the land use activities while further protecting these resources.

Cumulative Effects

This project would result in a direct beneficial alteration to woodland and meadow areas within the park. Removal of invasive species and restoration activities will have long term, direct benefits to the overall landscape.

Topography

The proposed Fitness Loop Trail and Adventure Path will have no effect on the topography of the Ace Sand site as the trails will all be installed to blend with the existing landscape. Minor grading may be required during installation of the hard surface and soft surface trails to address runoff and erosion concerns. The Ace Sand park site is suitable for this use and the new trails will enhance current facilities within the park.

Cumulative Effects

This project would result in a direct short-term impacts to the topography within the park as the trails and fitness stations are installed.

Fish and Wildlife

The proposed Fitness Loop Trail and Adventure Path would provide an increase in wildlife habitat through the meadow and forest restoration activities associated with the project. In order to discourage park visitors from re-creating social trails through the buffer to the river from the main trail, certain species of native plants that are considered a nuisance to walk through to the average person may be planted. Among these would be buckthorn (*Bumelia sp.*), hawthorn (*Crataegus sp.*), and blackberry (*Rubus sp.*); these are native species that have wildlife value in the form of food and habitat, and thorns to discourage trampling by humans and Canada geese in the area of planting. Therefore, this project would be beneficial to local wildlife populations and indirectly to fish populations as water quality is addressed in future phases. The only adverse effect that would occur as a result of implementing this alternative would be the negligible short-term, direct impact during construction of the riverside elements.

Cumulative Effects

This alternative would result in negligible, localized, direct long-term beneficial effects to the terrestrial wildlife populations that would utilize the newly planted vegetation for food and cover. Overall, the cumulative effects of this project on fish and wildlife populations would be localized, direct, and long term. No impairment of fish or wildlife would occur because of implementation of this project.

Protected Species

The proposed project would not have an adverse effect on protected species due to the fact that no individuals, populations or habitats for protected species have been identified within the areas of proposed construction. With the native re-vegetation measures proposed, habitat suitable for migratory birds may develop, which would render the establishment of a protected species population in the future possible, but not likely due to the high degree of visitor use of this popular riverside park area. Thus, the project would have no adverse effect on protected species populations or habitats.

Cumulative Effects

This project would result in no cumulative effects on protected species. In addition, it would result in no impairment to protected species.

Migratory Birds

Implementation of the Fitness Loop Trail and Adventure Path would support both resident and migratory birds along the Chattahoochee River by protecting and improving the midstory and tree canopy along the river, adding native vegetation where it is needed, and retaining the canopy vegetation the birds require. Not only would there be no adverse effect of this project on migratory birds, there would be a minor long-term, beneficial effect from the improvement in conditions along the river.

Cumulative Effects

This alternative would result in negligible, localized, beneficial effects to migratory birds with the increase in potential habitat and food resources proposed by the invasive species removal and meadow/forest restoration. Trail installation would occur in areas already disturbed and cleared of vegetation. Thus, cumulative effects to migratory birds would be negligible, localized, indirect and beneficial. No impairments to migratory birds would result from this alternative.

Vegetation

The construction of the Fitness Loop Trail and Adventure Path will have minimal impacts on native vegetation within the park. The trail and path will be installed to blend into the existing landscape and only minor vegetation removal will be required to construct the trail and path. As part of the project, invasive species will be removed, and the wooded area replanted with native trees and shrubs. Meadow areas will be replanted with native forbs and grasses to supplement the existing vegetation.

No endangered or rare species of vegetation are located within the Ace Sand park so the project will have no effect on any protected plant species.

Cumulative Effects

This alternative would result in localized, beneficial effects to the vegetation community within the park. Invasive species will be removed and replaced with native species. Trail installation would occur in areas already disturbed and cleared of vegetation. Thus, cumulative effects to vegetation would be negligible, localized, direct and beneficial.

Geology and Soils

The proposed project would have negligible short-term adverse effects on soils during construction. Although the area of impact would be small and offset by the restoration of meadow and wooded areas, this project would result in minor adverse effects to soils within the construction zones. However, the benefit of a stabilized path adjacent to the river, will result in an overall long-term benefit to soils in Ace Sand park. Therefore, no long-term adverse effects to soils are anticipated as a result of this alternative.

Cumulative Effects

The installation of the Fitness Loop Trail and Adventure Path would result in cumulative effects that are negligible, localized, indirect and long-term. However, no overall impairment to soils would occur under this project.

Mineral Resources

The Ace Sand park was previously used for dredging activities on the Chattahoochee River. The City purchased the property from the Ace Sand Company in 1999, although dredging activities continued for several years. Currently, there is no dredging activity within the park and there are no active dredging permits for this part of the Chattahoochee River. No mineral rights are reserved by others on the site.

Cumulative Effects

The installation of the Fitness Loop Trail and Adventure Path would result in no adverse effect to the mineral resources within the Ace Sand park.

Air and Water Quality

Air Quality

The air quality under this project would not be expected to be adversely impacted. The leading factor causing poor air quality in the area would be from the use of automobiles. Traffic levels would not be expected to change within the area as a result of this project; therefore, no adverse impacts to air quality would be anticipated with implementation of the Fitness Loop Trail and Adventure Path.

Cumulative Effects

This alternative would result in no cumulative effects or impairments on air quality.

Water Quality

The construction of the Fitness Loop Trail and Adventure Path may cause a short-term impact in local water quality with the construction of the riverside elements. However, all best management practices and applicable laws and regulations with regards to the protection of water quality would be adhered to throughout the construction process. Furthermore, due to the small size of disturbance (<5 acres), water quality levels would be anticipated to return to normal upon completion of construction. Future construction of the Children's Stormwater Garden in Phase 2 of the master plan, would improve the water quality in this section of river from its current condition in the long term by minimizing sediment deposits into the river and increases treatment time of stormwater before it is discharged to the river. Therefore, there would be a minor, localized, long-term, direct beneficial effect to water quality under this and future projects.

Cumulative Effects

This Fitness Loop Trail and Adventure Path would result in negligible adverse effects to water quality. An increase in impervious surface that would occur in the construction of the other improvements would render cumulative effects as negligible, localized, indirect and long term. However, due to the small scale of the impacts, there would be no overall impairment to water quality as a result of this project.

Noise

The construction of the Fitness Loop Trail and Adventure Path may have temporary adverse effects on sensitive receivers during construction. However, given the small size of the construction areas, the duration of construction would not be long-term and would commence during hours when most residents are at work. Temporary impacts to noise would occur during construction of the proposed path amenities; however, noise levels would return to normal upon completion of the proposed actions.

Therefore, there would be no long-term adverse effect to sensitive noise receivers as a result of this project.

Cumulative Effects

This alternative would result in no cumulative effects or impairments on ambient noise levels.

Water Resources/Hydrology

A total of two small wetlands and four streams were identified within the project area; however, none would be impacted by construction of the Fitness Loop Trail and Adventure Path. Wetlands and floodplains would continue to be managed as they are currently. This would result in no direct adverse effect. This project would not alter the hydrology of the floodplain; thus, a “Statement of Finding” in accordance with E.O. 11988 and D.O. 77-2 would not be required. The work proposed in Phase 2 would benefit the floodplain in its ability to retain and store water, and it would also result in improved water quality and wildlife habitat protection during flooding events over the long term. Therefore, the Fitness Loop Trail and Adventure Path and future phases of park development would result in a negligible, long-term, indirect beneficial effect on floodplain values.

Cumulative Effects

There would be no net loss of wetlands or wetland quality as a result of this project, thus resulting overall in no impairment to wetlands. This project would result in a negligible increase of impervious surface within the Chattahoochee River watershed with the construction of the trail and paths. The cumulative effects to floodplain values are negligible, localized, indirect and long term. This project would result in no impairment of floodplains.

Historic/Archaeological/Cultural Resources

Georgia Archaeological Site Files revealed that six previously recorded sites, 9CO86, 9CO87, 9FU3, 9FU5, 9FU25 and 9FU228, are located within or near the parks included in the 2016 Master Plan. Shovel tests and surface examination in Ace Sand park did not reveal any sites within the Ace Sand park boundary. In addition, the only site eligible for inclusion in the National Register, Site 9FU228, occurs just west of the boundary of Riverside Park and not near the proposed project in Ace Sand park.

Due to the lack of cultural resources identified within the park site, the proposed Fitness Loop Trail and Adventure Path would not result in adverse effects to cultural resources.

Cumulative Effects

The proposed project would not result in cumulative impacts or impairments to cultural resources.

Transportation

The proposed Fitness Loop Trail and Adventure Path will have negligible impacts on the transportation network along the river. The new trail can be accessed from parking areas in Don White Park. Additionally, future phases of the master plan for the Ace Sand park include parking areas that will provide parking in close proximity to the Fitness Loop Trail and Adventure Path. The implementation of the trail and path do not impact any long-range plans for the City's transportation system. The implantation of this phase of the master plan will increase opportunities for pedestrian and bicycle use along the river corridor.

Cumulative Effects

The proposed project would not result in cumulative impacts or impairments to the transportation system.

Socio-Economic Characteristics

The proposed project would result in a temporary adverse effect to aesthetics of the park during construction. However, upon completion of construction of the Fitness Loop Trail and Adventure Path, and revegetation of the restoration areas, the park will be greatly improved aesthetically, thus increasing the quality of visitor experience. Therefore, there would be no long-term adverse impacts to aesthetic resources as a result of this project.

The Fitness Loop Trail and Adventure Path will provide additional physical fitness options to people of all socio-economic levels. The trail and fitness stations will be available at no cost and will provide an option for outdoor recreation and fitness. This will provide a long-term benefit to the public.

Cumulative Effects

This project would have long term beneficial effects to aesthetics and physical fitness options for all socio-economic levels. The development of aesthetically pleasing recreation opportunities restoration of meadow and woodland habitats will create an atmosphere that is attractive to visitors for years to come. Thus, the cumulative impacts would be minor, localized, direct, beneficial and long term. There would be no impairment to socio-economic characteristics from implantation of this project.

IV. SUMMARY

In 2016 the City of Roswell Recreation, Parks, Historic and Cultural Affairs department developed a comprehensive master plan for all the parks and City-owned property along the Chattahoochee River from GA 400 to the Cobb County line. The park to be developed on the Ace Sand property is the first park within the master plan to received funding for design and implementation which has been phased based on available funding.

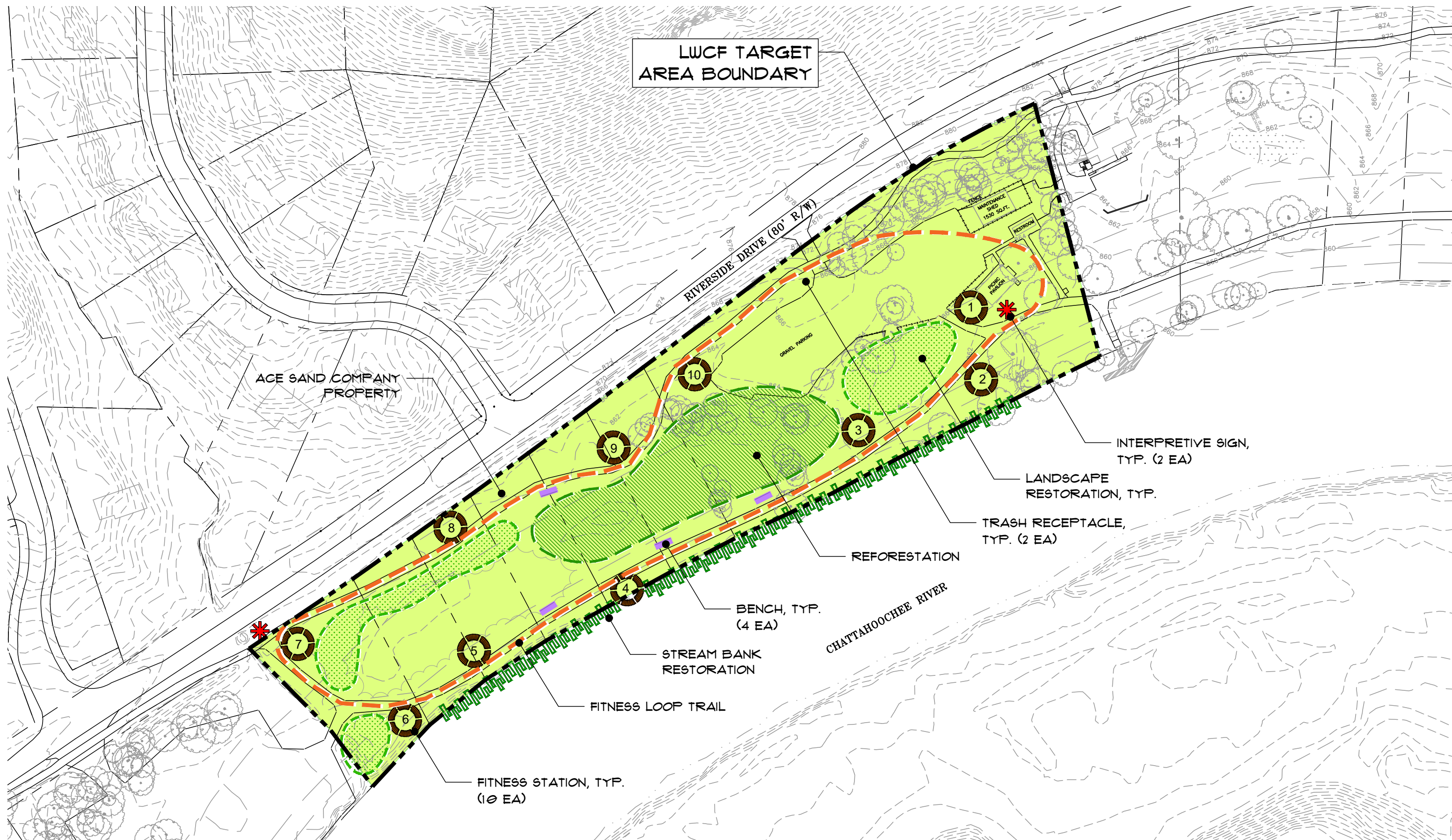
The first phase is the design and construction of a Fitness Loop Trail and Adventure Path on the eastern property boundary that connects to an existing trail system on the Don White Park property. The second phase is a Children's Stormwater Garden in the center of the property and a third phase of the master plan calls for a multi-use community building on the western portion of the site. The fitness loop trail and adventure path are the work elements to be accomplished with funds from the LWCF grant and Phases 2 and 3 will be implemented as funding allows. This document was made available for a 30-day public comment period from June 2, 2021, to July 6, 2021. The Draft Environmental Assessment was available at the City of Roswell City Hall, and on the City's website. A total of 12 comments were received and responses were provided to each commentor. A summary of the comments and responses can be found in Appendix D.

The Fitness Loop Trail and Adventure Path will provide various types of fitness equipment, stationed in nine nodes, along the larger perimeter pathway. Smaller trails will connect through the park's center, creating an adventurous woodland experience for site users. The proposed LWCF grant to implement the Fitness Loop Trail and Adventure Path is the most beneficial use of the site because it will provide an outdoor recreation experience for all ages and skill levels. It will provide opportunities for active fitness programs as well as passive pedestrian users. It will convert an under-utilized part of the City's park property and be a catalyst for Phases 2 and 3 of the master plan in the future. In addition, the Fitness Loop Trail and Adventure Path can be constructed with little long-term negative effects to the surrounding environment, and the proposed invasive species removal coupled with the meadow and forest restoration will provide a long-term, direct, beneficial effect.

APPENDIX A

Ace Sand Fitness Loop Trail and Adventure Path

1. Conceptual Plan
2. Artistic Rendering



ROSWELL ACE SAND - FITNESS LOOP TRAIL CONCEPT



- 1 8' WIDE PAVED PATH
- 2 EXISTING RIVERWALK PATH
- 3 FITNESS STATIONS, TIMBER EQUIP. AND MULCH SURFACING
- 4 MEADOW RECLAMATION
- 5 ADVENTURE TRAIL
- 6 FOREST RESTORATION
- 7 CONSTRUCTED WETLAND
- 8 WOOD BRIDGES



ROSWELL ACE SAND - FITNESS LOOP TRAIL



APPENDIX B
USFWS Information for Planning and Consultation (IPaC)
Correspondence



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Georgia Ecological Services Field Office
355 East Hancock Avenue
Room 320
Athens, GA 30601
Phone: (706) 613-9493 Fax: (706) 613-6059

In Reply Refer To:
Consultation Code: 04EG1000-2021-SLI-2027
Event Code: 04EG1000-2021-E-03829
Project Name: Ace Sand Park

April 27, 2021

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

To Whom It May Concern:

Thank you for your recent request for information on federally listed species and important wildlife habitats that may occur in your project area. The U.S. Fish and Wildlife Service (Service) has responsibility for certain species of wildlife under the Endangered Species Act (ESA) of 1973 as amended (16 USC 1531 et seq.), the Migratory Bird Treaty Act (MBTA) as amended (16 USC 701-715), and the Bald and Golden Eagle Protection Act (BGEPA) as amended (16 USC 668-668c). We are providing the following guidance to assist you in determining which federally imperiled species may or may not occur within your project area and to recommend some conservation measures that can be included in your project design if you determine those species or designated critical habitat may be affected by your proposed project.

FEDERALLY-LISTED SPECIES AND DESIGNATED CRITICAL HABITAT

Attached is a list of endangered, threatened, and proposed species that may occur in your project area. Your project area may not necessarily include all or any of these species. Under the ESA, it is the responsibility of the Federal action agency or its designated representative to determine if a proposed action "may affect" endangered, threatened, or proposed species, or designated critical habitat, and if so, to consult with the Service further. Similarly, it is the responsibility of the Federal action agency or project proponent, not the Service, to make "no effect" determinations. If you determine that your proposed action will have "no effect" on threatened or endangered species or their respective critical habitat, you do not need to seek concurrence with the Service. Nevertheless, it is a violation of Federal law to harm or harass any federally-listed threatened or endangered fish or wildlife species without the appropriate permit.

If you determine that your proposed action may affect federally listed species, please consult with the Service. Through the consultation process, we will analyze information contained in a biological assessment or equivalent document that you provide. If your proposed action is associated with Federal funding or permitting, consultation will occur with the Federal agency under section 7(a)(2) of the ESA. Otherwise, an incidental take permit pursuant to section 10(a)(1)(B) of the ESA (also known as a Habitat Conservation Plan) may be necessary to exempt harm or harass federally listed threatened or endangered fish or wildlife species. For more information regarding formal consultation and HCPs, please see the Service's Consultation Handbook and Habitat Conservation Plans at www.fws.gov/endangered/esa-library/index.html#consultations.

Action Area. The scope of federally listed species compliance not only includes direct effects, but also any indirect effects of project activities (e.g., equipment staging areas, offsite borrow material areas, or utility relocations). The action area is the spatial extent of an action's direct and indirect modifications to the land, water, or air (50 CFR 402.02). Large projects may have effects to land, water, or air outside the immediate footprint of the project, and these areas should be included as part of the action area. Effects to land, water, or air outside of a project footprint could include things like lighting, dust, smoke, and noise. To obtain a complete list of species, the action area should be uploaded or drawn in IPaC rather than just the project footprint.

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

If you determine that your action may affect any federally listed species and would like technical assistance from our office please provide the following information (reference to these items can be found in 50 CFR§402.13 and 402.14):

A description of the proposed action, including any measures intended to avoid, minimize, or offset effects of the action. Consistent with the nature and scope of the proposed action, the description shall provide sufficient detail to assess the effects of the action on listed species and critical habitat, including:

1. The purpose of the action;
 2. The duration and timing of the action;
 3. The location of the action;
 4. The specific components of the action and how they will be carried out;
 5. Description of areas to be affected directly or indirectly by the action;
-

6. Information on the presence of listed species in the action area;
7. Description of effects of the action on species in the action area;
8. Maps, drawings, blueprints, or similar schematics of the action; and
9. Any other available information related to the nature and scope of the proposed action relevant to its effects on listed species or designated critical habitat (examples include: stormwater plans, management plans, erosion and sediment plans).

Please submit all consultation documents via email to gaes_assistance@fws.gov or by using IPaC, uploaded documents, and sharing the project with a specific Georgia Ecological Services staff member. If the project is on-going, documents can also be sent to the Georgia ES staff member currently working with you on your project. For Georgia Department of Transportation-related projects, please work with the Office of Environmental Services ecologist to determine the appropriate USFWS transportation liaison.

WETLANDS AND FLOODPLAINS

Under Executive Orders 11988 and 11990, Federal agencies are required to minimize the destruction, loss, or degradation of wetlands and floodplains, and preserve and enhance their natural and beneficial values. These habitats should be conserved through avoidance, or mitigated to ensure that there would be no net loss of wetlands function and value.

We encourage you to use the National Wetland Inventory (NWI) maps in conjunction with ground-truthing to identify wetlands occurring in your project area. The Service's NWI program website, www.fws.gov/wetlands/Data/Mapper.html integrates digital map data with other resource information. We also recommend you contact the U.S. Army Corps of Engineers for permitting requirements under section 404 of the Clean Water Act if your proposed action could impact floodplains or wetlands.

MIGRATORY BIRDS

The MBTA prohibits the taking of migratory birds, nests, and eggs, except as permitted by the Service's Migratory Bird Office. To minimize the likelihood of adverse impacts to migratory birds, we recommend construction activities occur outside the general bird nesting season from March through August, or that areas proposed for construction during the nesting season be surveyed, and when occupied, avoided until the young have fledged.

We recommend review of Birds of Conservation Concern at website www.fws.gov/migratorybirds/CurrentBirdIssues/Management/BCC.html to fully evaluate the effects to the birds at your site. This list identifies birds that are potentially threatened by disturbance and construction.

Information related to wind energy development and migratory birds can be found at this location: <https://www.fws.gov/birds/management/project-assessment-tools-and-guidance/guidance-documents/wind-energy.php>.

BALD AND GOLDEN EAGLES

The bald eagle (*Haliaeetus leucocephalus*) was delisted under the ESA on August 9, 2007. Both the bald eagle and golden eagle (*Aquila chrysaetos*) are still protected under the MBTA and BGEPA. The BGEPA affords both eagles protection in addition to that provided by the MBTA, in particular, by making it unlawful to “disturb” eagles. Under the BGEPA, the Service may issue limited permits to incidentally “take” eagles (e.g., injury, interfering with normal breeding, feeding, or sheltering behavior nest abandonment). For information on bald and golden eagle management guidelines, we recommend you review information provided at <https://www.fws.gov/birds/management/managed-species/bald-and-golden-eagle-information.php> and <https://www.fws.gov/birds/management/managed-species/eagle-management.php>. Additionally the following site will help you determine if your activity is likely to take or disturb bald eagles in the southeast (<https://www.fws.gov/southeast/our-services/eagle-technical-assistance>).

NATIVE BAT COMMENTS

If your species list includes Indiana bat or northern long-eared bat and the project is expected to impact forested habitat that is appropriate for maternity colonies of these species, forest clearing during the winter. Federally listed bats could be actively present in forested landscapes from April 1 to October 15 of any year and have non-volant pups from May 15 to July 31 in any year. Non-volant pups are incapable of flight and are vulnerable to disturbance during that time.

Additional information on bat avoidance and minimization can be found at the following link: https://www.fws.gov/athens/transportation/pdfs/Bat_AMMs.pdf.

Additional information that addresses at-risk or high priority natural resources can be found in the State Wildlife Action Plan (<https://georgiawildlife.com/WildlifeActionPlan>), at Georgia Department of Natural Resources, Wildlife Resources Division Rare Species and Natural Community Portal (<https://georgiawildlife.com/conservation/species-of-concern>), Georgia's Natural, Archaeological, and Historic Resources GIS portal (<https://www.gnahrgis.org/gnahrgis/index.do>), and Georgia Ecological Services Watershed Guidance portal (<https://www.fws.gov/athens/transportation/coordination.html>).

Thank you for your concern for endangered and threatened species. We appreciate your efforts to identify and avoid impacts to listed and sensitive species in your project area. For further consultation on your proposed activity, please email gaes_assistance@fws.gov and reference your Service Consultation Tracking Number (Consultation Code).

This letter constitutes Georgia Ecological Services' general comments under the authority of the Endangered Species Act.

Attachment(s):

- Official Species List
 - Migratory Birds
-

Official Species List

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

This species list is provided by:

Georgia Ecological Services Field Office

355 East Hancock Avenue

Room 320

Athens, GA 30601

(706) 613-9493

Project Summary

Consultation Code: 04EG1000-2021-SLI-2027

Event Code: 04EG1000-2021-E-03829

Project Name: Ace Sand Park

Project Type: RECREATION CONSTRUCTION / MAINTENANCE

Project Description: The 2016 Roswell River Parks Master Plan establishes a vision for approximately 3.3 miles of waterfront public spaces along the northern bank of the Chattahoochee River, including six city-owned facilities. The Master Plan incorporates plans for Willeo Park, Azalea Park, River Landing, Riverside Park, Ace Sand, and Don White Memorial Park. Ace Sand is the first of these sites to receive design funding to implement this vision. One component of the project is a Fitness Loop Trail and Adventure Path. The Fitness Loop Trail and Adventure Path will be located in the eastern portion of the Ace Sand site. Various types of fitness equipment will be stationed in nodes along a larger perimeter pathway, while smaller trails will connect through the grove's center, creating an immersive, adventurous woodland experience for site users.

Project Location:

Approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@34.0104035,-84.33806100531582,14z>



Counties: Fulton County, Georgia

Endangered Species Act Species

There is a total of 0 threatened, endangered, or candidate species on this species list.

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

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

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

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

Critical habitats

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

Migratory Birds

Certain birds are protected under the Migratory Bird Treaty Act¹ and the Bald and Golden Eagle Protection Act².

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described [below](#).

-
1. The [Migratory Birds Treaty Act](#) of 1918.
 2. The [Bald and Golden Eagle Protection Act](#) of 1940.
 3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

The birds listed below are birds of particular concern either because they occur on the [USFWS Birds of Conservation Concern](#) (BCC) list or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ [below](#). This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the [E-bird data mapping tool](#) (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found [below](#).

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Bald Eagle <i>Haliaeetus leucocephalus</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1626	Breeds Sep 1 to Jul 31
Blue-winged Warbler <i>Vermivora pinus</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA	Breeds May 1 to Jun 30

NAME	BREEDING SEASON
Eastern Whip-poor-will <i>Antrastomus vociferus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 1 to Aug 20
Golden Eagle <i>Aquila chrysaetos</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1680	Breeds elsewhere
Prairie Warbler <i>Dendroica discolor</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 1 to Jul 31
Red-headed Woodpecker <i>Melanerpes erythrocephalus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 10 to Sep 10
Rusty Blackbird <i>Euphagus carolinus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds elsewhere
Wood Thrush <i>Hylocichla mustelina</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 10 to Aug 31

Probability Of Presence Summary

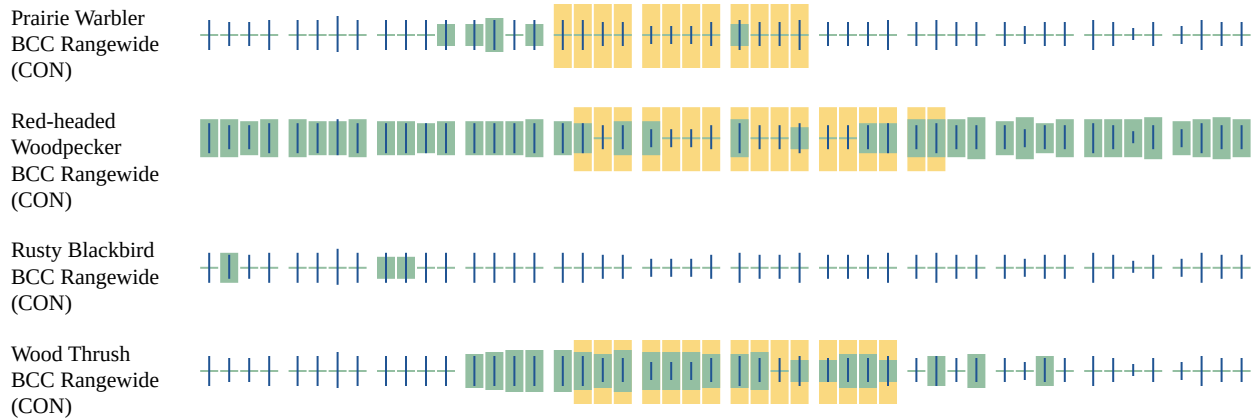
The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.



Additional information can be found using the following links:

- Birds of Conservation Concern <http://www.fws.gov/birds/management/managed-species/birds-of-conservation-concern.php>
- Measures for avoiding and minimizing impacts to birds <http://www.fws.gov/birds/management/project-assessment-tools-and-guidance/conservation-measures.php>
- Nationwide conservation measures for birds <http://www.fws.gov/migratorybirds/pdf/management/nationwidestandardconservationmeasures.pdf>

Migratory Birds FAQ

Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

[Nationwide Conservation Measures](#) describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. [Additional measures](#) or [permits](#) may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the migratory birds potentially occurring in my specified location?

The Migratory Bird Resource List is comprised of USFWS [Birds of Conservation Concern \(BCC\)](#) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle ([Eagle Act](#)

requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the [AKN Phenology Tool](#).

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the [Avian Knowledge Network \(AKN\)](#). This data is derived from a growing collection of [survey, banding, and citizen science datasets](#).

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go to the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering, migrating or present year-round in my project area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may refer to the following resources: [The Cornell Lab of Ornithology All About Birds Bird Guide](#), or (if you are unsuccessful in locating the bird of interest there), the [Cornell Lab of Ornithology Neotropical Birds guide](#). If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are [Birds of Conservation Concern](#) (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the [Eagle Act](#) requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the [Northeast Ocean Data Portal](#). The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the [NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf](#) project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the [Diving Bird Study](#) and the [nanotag studies](#) or contact [Caleb Spiegel](#) or [Pam Loring](#).

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to [obtain a permit](#) to avoid violating the Eagle Act should such impacts occur.

Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

APPENDIX C
Phase I Cultural Resource Survey Report
and HPD Correspondence

PHASE I ARCHEOLOGICAL SURVEY
CITY OF ROSWELL CHATTAHOOCHEE RIVER DOCKS
FULTON COUNTY, GEORGIA

May 31, 2006

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Phase I Archeological Survey
City of Roswell Chattahoochee River Docks
Fulton County, Georgia

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R.S. Webb & Associates Project No. 06-183-041

May 31, 2006

ABSTRACT

A Phase I archeological survey of selected areas within six tracts adjacent to the Chattahoochee River was conducted in the City of Roswell, Fulton County, Georgia to locate and identify archeological sites and assess resource significance. No archeological sites or isolated finds were recorded. Archeological clearance to proceed with project implementation in the areas investigated is recommended.

TABLE OF CONTENTS

ABSTRACT	i
LIST OF TABLES	v
LIST OF FIGURES	vi
MANAGEMENT SUMMARY	vii
1.0 INTRODUCTION	1
1.1 Project Background	1
1.2 Location, Description and Area of Potential Effects	1
1.3 Potential Impacts	1
1.4 Scope-of-Work	8
1.5 Disposition of Documentary Materials	8
2.0 ENVIRONMENTAL CONTEXT	9
2.1 Physiographic Characteristics	9
2.2 Geology and Lithic Resources	9
2.3 Pedology and Geomorphological Considerations	9
2.4 Biotic Communities	10
2.4.1 Late Pleistocene-Early Holocene Communities	10
2.4.2 Modern Environments	11
2.5 Climate	12
2.6 Historic Alteration of the Environment	12
3.0 CULTURAL CONTEXT	14
3.1 Archival Sources	14
3.2 Previous Investigations	15
3.3 Cultural History	17
3.3.1 Paleoindian Period	18
3.3.2 Archaic Period	19
3.3.3 Woodland Period	21
3.3.4 Mississippian Period	24
3.3.5 Protohistoric and Native American Period	26
3.3.6 Historic Period	27
4.0 RESEARCH DESIGN AND EVALUATION CRITERIA	31
4.1 Project Goal	31
4.2 Research Issues	31
4.2.1 Temporal/Cultural Affiliations and Cultural Chronology	31
4.2.2 Human Settlement and Use	31
4.2.3 Research Questions	33
5.0 FIELD METHODS	35
5.1 Field Survey Strategies	35
5.2 Archeological Field Survey Techniques, Implementation and Rationale	35

TABLE OF CONTENTS - CONTINUED

6.0 SURVEY RESULTS 36
 6.1 Previously Recognized Cultural Resources 36
 6.2 Archeological Field Survey 38

7.0 CONCLUSIONS AND RECOMMENDATIONS 48
 7.1 Summary of Survey Findings 48
 7.2 Management Recommendations 48

8.0 BIBLIOGRAPHY 49

APPENDIX A - RESUME OF THE PRINCIPAL INVESTIGATOR A-1

LIST OF TABLES

Table 2.1 Chronological Synopsis of Piedmont Paleoflora	10
Table 3.1 Cultural Chronology for North Georgia	17
Table 6.1 Archeological Sites in or Adjacent to the Project Areas	36

LIST OF FIGURES

Figure 1.1	Locations of Project Areas (Mountain Park, GA (1992), Roswell, GA (1992), and Sandy Springs (1993) U.S. Geologic Survey (USGS) topographic quadrangles)	2
Figure 1.2	Locations of Survey Areas Within the Willeo Park and Don White Park Project Areas	3
Figure 1.3	Locations of Survey Areas Within the Azalea Park Project Area	4
Figure 1.4	Location of Survey Area Within the Riverside Park Project Area	5
Figure 1.5	Locations of Survey Areas Within the Ace Sand Company Tract Project Area	6
Figure 1.6	Locations of Survey Areas Within the Wells Tract Project Area	7
Figure 6.1	Previously Recorded Cultural Resources	37
Figure 6.2	Selected Views of the Surveyed Areas in the Willeo Park Project Tract	39
Figure 6.3	Selected Views of the Surveyed Areas in the Azalea Park Project Tract	40
Figure 6.4	Selected Views of the Surveyed Areas in the Riverside Park Project Tract	41
Figure 6.5	Selected Views of the Surveyed Areas in the Ace Sand Company Project Tract	43
Figure 6.6	Selected Views of the Surveyed Areas in the Ace Sand Company Project Tract	44
Figure 6.7	Selected Views of the Surveyed Areas in the Don White Park Project Tract	45
Figure 6.8	Selected Views of the Surveyed Areas in the Wells Project Tract	46
Figure 6.9	Selected Views of the Surveyed Areas in the Wells Project Tract	47

MANAGEMENT SUMMARY

Background

R.S. Webb & Associates (RSWA) conducted a Phase I archeological survey of six tracts adjacent to the Chattahoochee River in the City of Roswell, Fulton County, Georgia from May 2-3, 2006. The study was conducted on behalf of Ecological Solutions, Inc., to locate and identify cultural resources within the project areas and assess resource significance based on National Register of Historic Places (NRHP) criteria [36 CFR Part 60.4]. The six project tracts are located on the north side of the Chattahoochee River, spanning the section of the river between Willeo Creek and Martin Lake.

The Phase I archeological survey included a literature review and an intensive field survey. During the literature review, state and county records, maps and documents were examined to determine if previously recorded archeological sites or historic structures are located within or adjacent to the project areas. Using surface and subsurface techniques, the field survey was conducted to identify and record archeological sites within the study area.

Methodology

Literature Review: At the Georgia Archaeological Site Files located at the University of Georgia in Athens (UGA), the official files and maps were examined, followed by a review of the pertinent site forms and the Laboratory of Archeology manuscript/report files. At the Georgia Department of Natural Resources Historic Preservation Division (HPD) in Atlanta, pertinent compliance document files, official maps, and NRHP/pending files were reviewed, as well as Fulton County historic structures survey files. Historic maps, early aerial photographs, and relevant land lottery plats were examined at the State Archives in Morrow and the UGA Science Library (Athens). The *Official Military Atlas of the Civil War* (Davis *et al.* 1983) and *The Campaign for Atlanta* (Scaife 1993) were also consulted.

Archeological Survey: This was an intensive field survey, designed to determine the presence or absence of archeological resources within the study areas, and to assess their significance based on NRHP criteria. The field team surveyed the project areas using surface and subsurface techniques to search for archeological resources. Exposed surfaces within the project areas were inspected for artifacts and surface features. For large areas of surface exposure, the survey team walked zig-zag patterns to maximize the recovery of surface artifacts. Subsurface techniques included the excavation of 30 by 30 centimeter (cm) screened shovel tests until sterile subsoil was encountered. The shovel test profiles were inspected and recorded. Shovel tests were excavated at intervals no greater than 30 m apart.

Results

Literature Review: Review of records at the Georgia Archaeological Site Files revealed that six previously recorded sites, 9CO86, 9CO87, 9FU3, 9FU5, 9FU25, and 9FU228 are located within or near the project tracts. Sites 9FU3 and 9FU5 are in or near the Wells Tract. A portion of Site 9FU25 is in the Riverside Park tract and 9FU228 is adjacent to Riverside Park. Portions of Sites 9CO86 and 9CO87 are within the Willeo Park tract. Review of the NRHP files at the Georgia Historic Preservation Division indicated that Ivy Mill (9FU228) has been determined eligible for the NRHP. The locally designated Roswell Historic District is located adjacent to Riverside Park.

Cultural Resources Field Survey: The field survey resulted in the identification of no archeological resources within the project Area of Potential Effects.

Project Effects and Management Recommendations: The proposed undertaking will have no effect on archeological or architectural properties eligible or potentially eligible for the NRHP. Cultural resources clearance is recommended for the City of Roswell Chattahoochee River Docks project.

1.0 INTRODUCTION

1.1 Project Background

The City of Roswell (the City) is proposing to construct public recreational facilities adjacent to the Chattahoochee River. As part of this process, the City must take into account the potential effect of the proposed undertaking on historic properties, in accordance with Section 106 of the National Historic Preservation Act [(NHPA) (Public Law 89-665; 80 STAT.915; 16 U.S.C. 470)]. Under the NHPA, this archeological survey was conducted to determine if significant archeological sites would be affected by the proposed project. The archeological survey was conducted to comply with guidelines set by the Georgia HPD (GDNR 1996) and the U.S. Secretary of the Interior (Federal Register 1999).

1.2 Location, Description and Area of Potential Effects

The “project areas” are six separate tracts of land located within the City of Roswell on the north side of the Chattahoochee River (Figure 1.1). The six project areas are Willeo Park, Azalea Park, Riverside Park, Ace Sand Company Tract, Don White Park, and Wells Tract. The areas surveyed are small locations of proposed improvements located within the six project areas.

The APEs for the survey areas were set at the boundaries of the physical effects of the proposed improvements (Figures 1.2 through 1.6). The justification for this is that the direct physical effects of the proposed undertaking will not extend beyond these boundaries. Within Willeo Park (Figure 1.2), an area for a proposed sea wall, concrete plaza, and canoe/kayak put-in was examined. We surveyed two areas at Azalea Park (Figure 1.3); the proposed location of a sea wall and the location of an existing dock that will be replaced with a new dock. At Riverside Park we surveyed the locations of two proposed observation decks adjacent to the river and the two associated boardwalks which lead to the decks (Figure 1.4). Two areas, a proposed riverboat dock and a proposed canoe/kayak put in/take out, were examined at the Ace Sand Company tract (Figure 1.5). At Don White Park we surveyed a proposed canoe/kayak put in and sea wall (Figure 1.2). We surveyed three proposed boardwalks and the associated observation decks at the Wells tract (Figure 1.6). The project areas are located within the Mountain Park, GA (1992); Roswell, GA (1992); and Sandy Springs, GA (1993) U.S. Geologic Survey (USGS) topographic quadrangles.

1.3 Potential Impacts

Activities associated with the proposed project that could directly or indirectly impact cultural resources include:

- Clearing and grubbing
- Heavy equipment staging and movement
- Erosion and siltation associated with any of the above

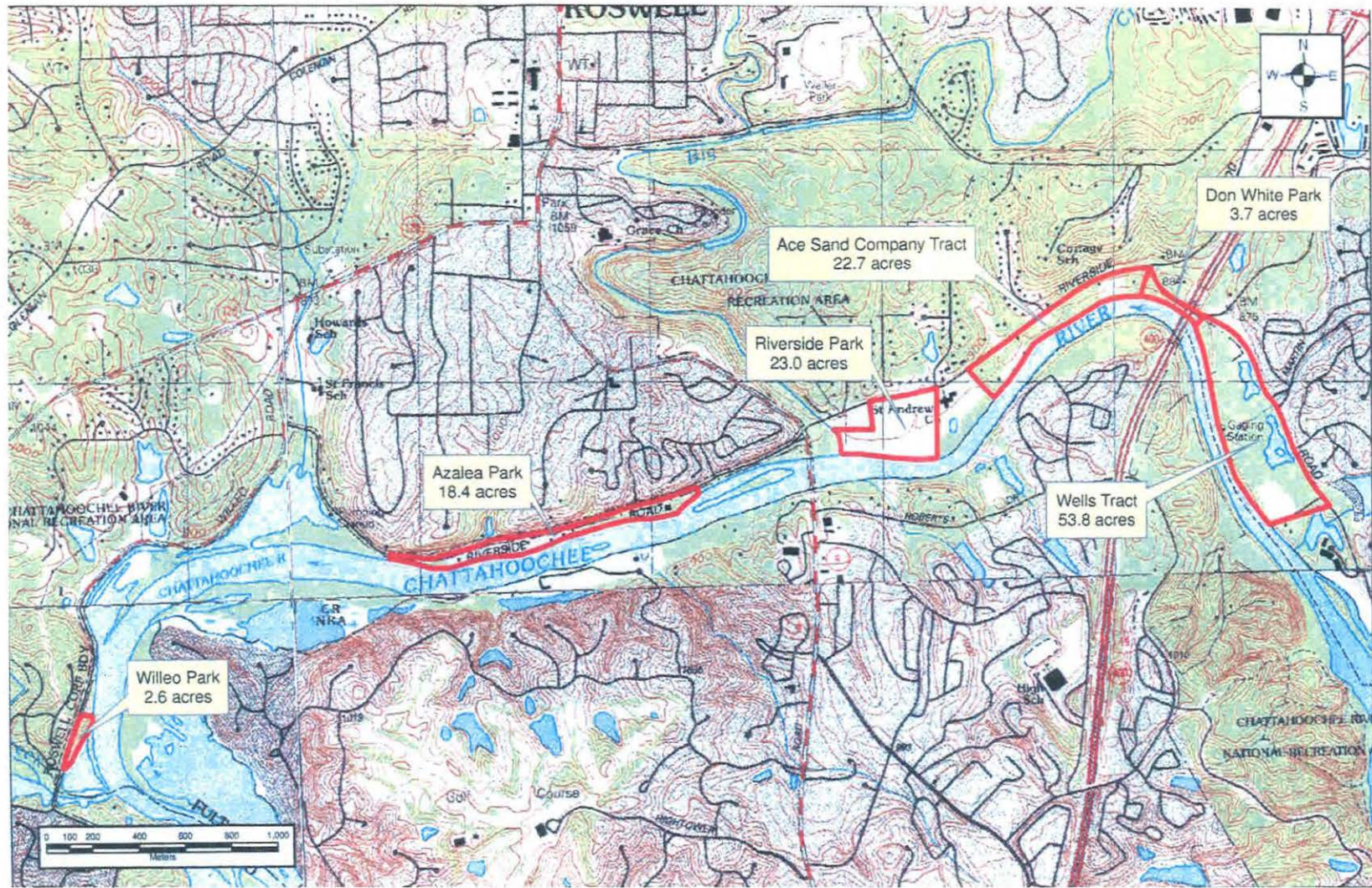
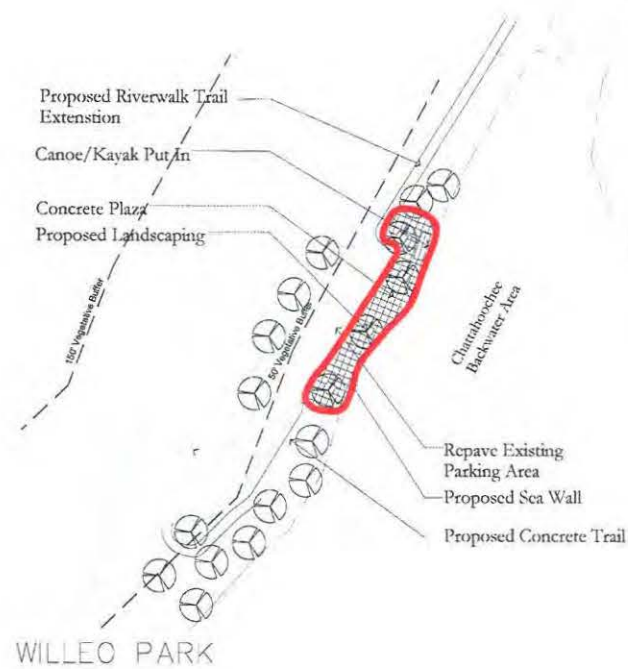
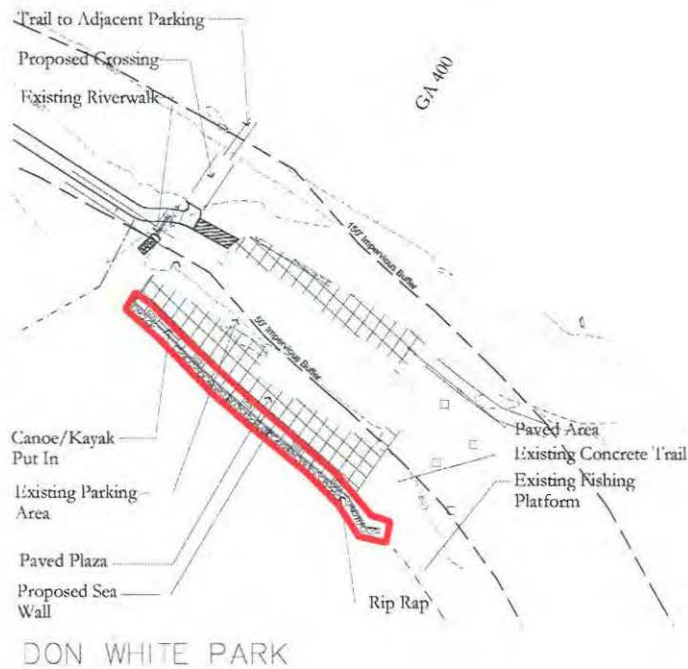


Figure 1.1 Locations of Project Areas (Mountain Park, GA (1992), Roswell, GA (1992), and Sandy Springs (1993) U.S. Geologic Survey (USGS) topographic quadrangles)



BOAT DOCK PLAN
ROSWELL GEORGIA
CONCEPT PLAN
WINTER 2005


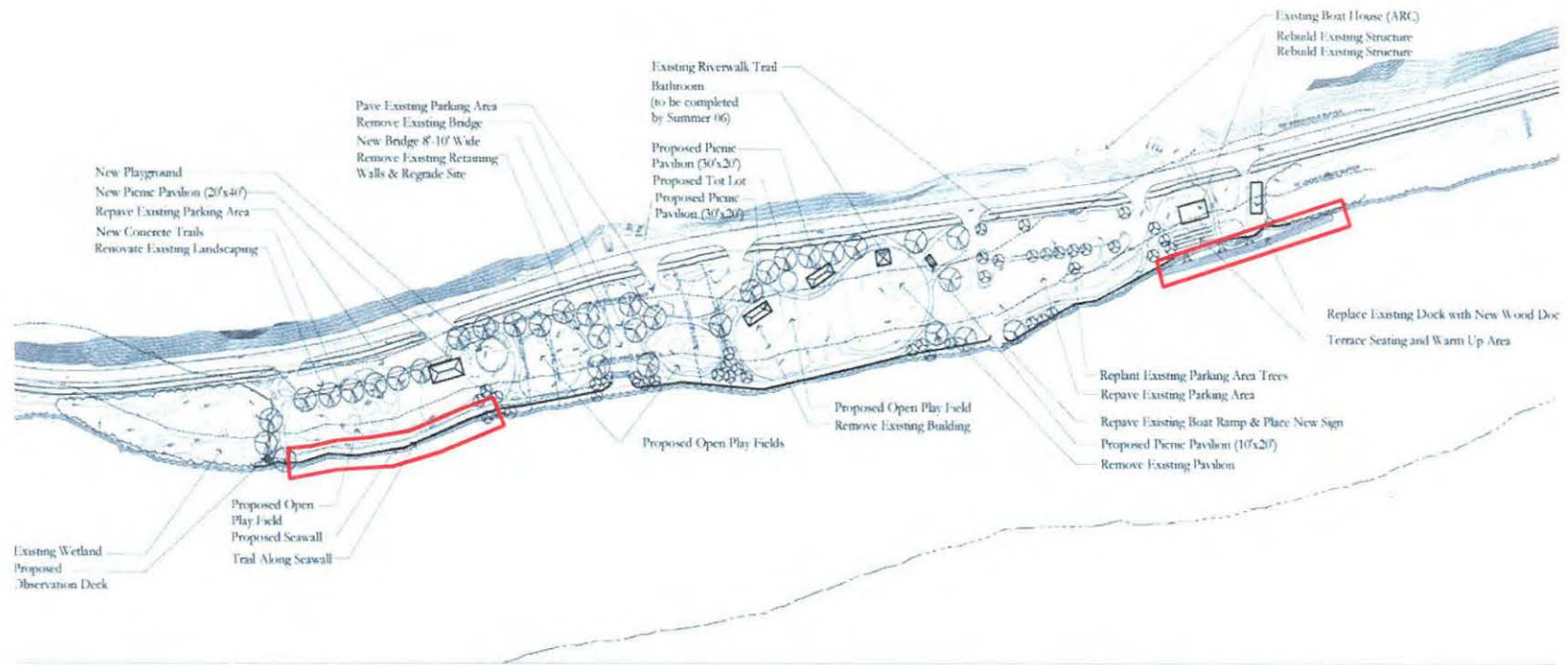

 Survey Areas



Figure 1.2 Locations of Survey Areas Within the Willeo Park and Don White Park Project Areas

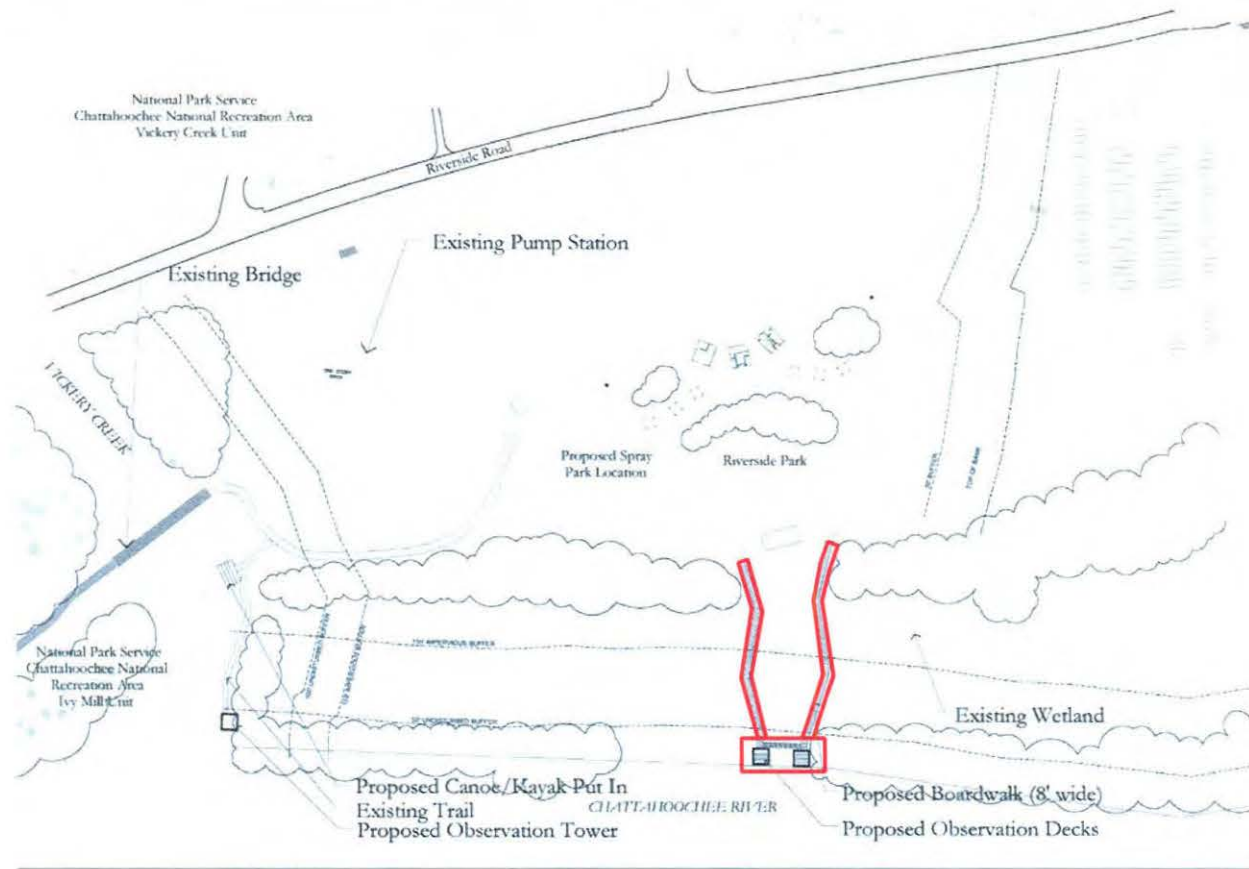


 Survey Areas

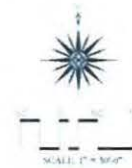
AZALEA PARK
 ROSWELL, GEORGIA
 DRAFT CONCEPT PLAN
 WINTER 2005



Figure 1.3 Locations of Survey Areas Within the Azalea Park Project Area



RIVERSIDE PARK ADDITION
 ROSWELL GEORGIA
 CONCEPT PLAN
 SPRING 2006



Survey Area

Figure 1.4 Location of Survey Area Within the Riverside Park Project Area

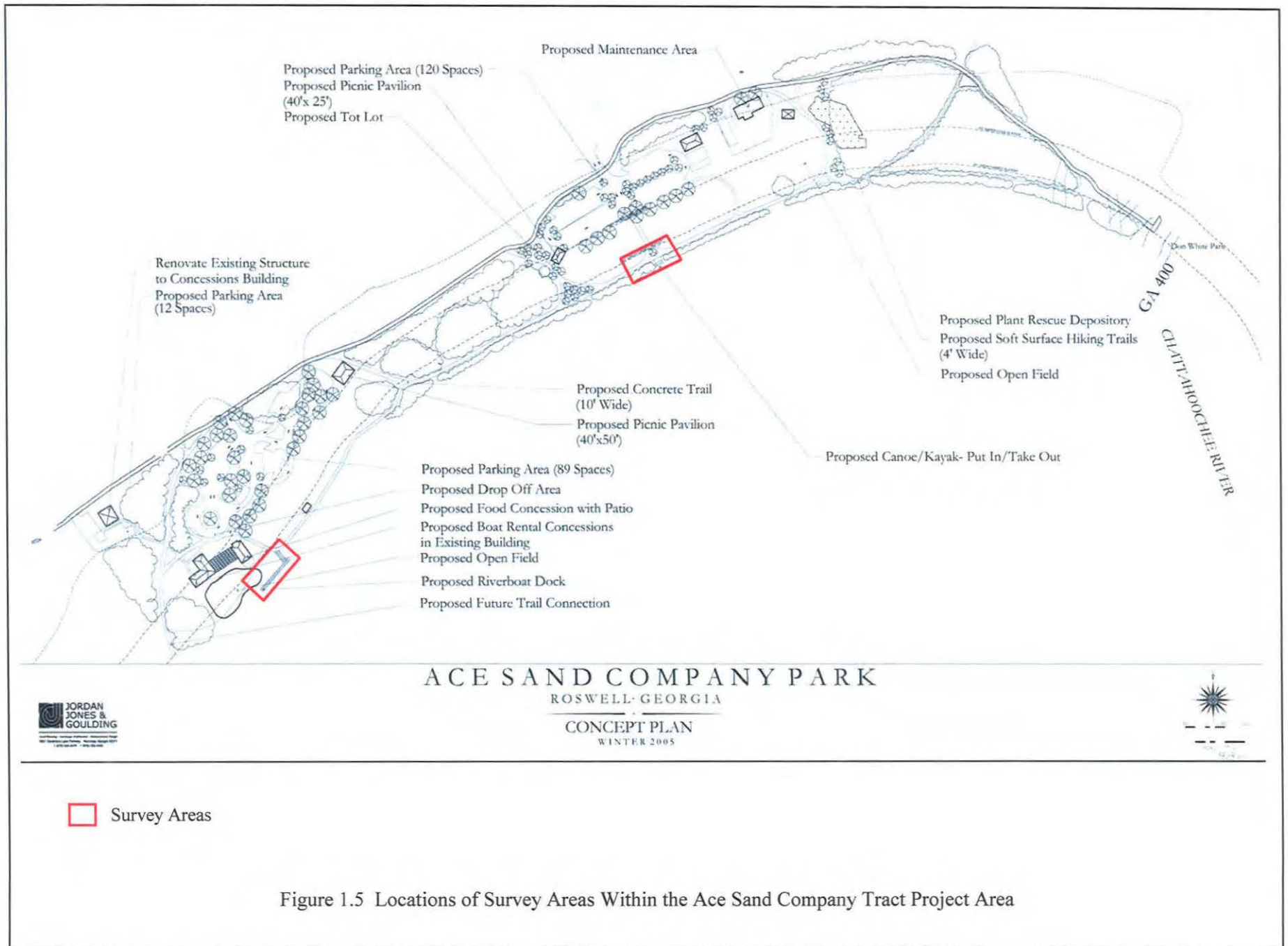
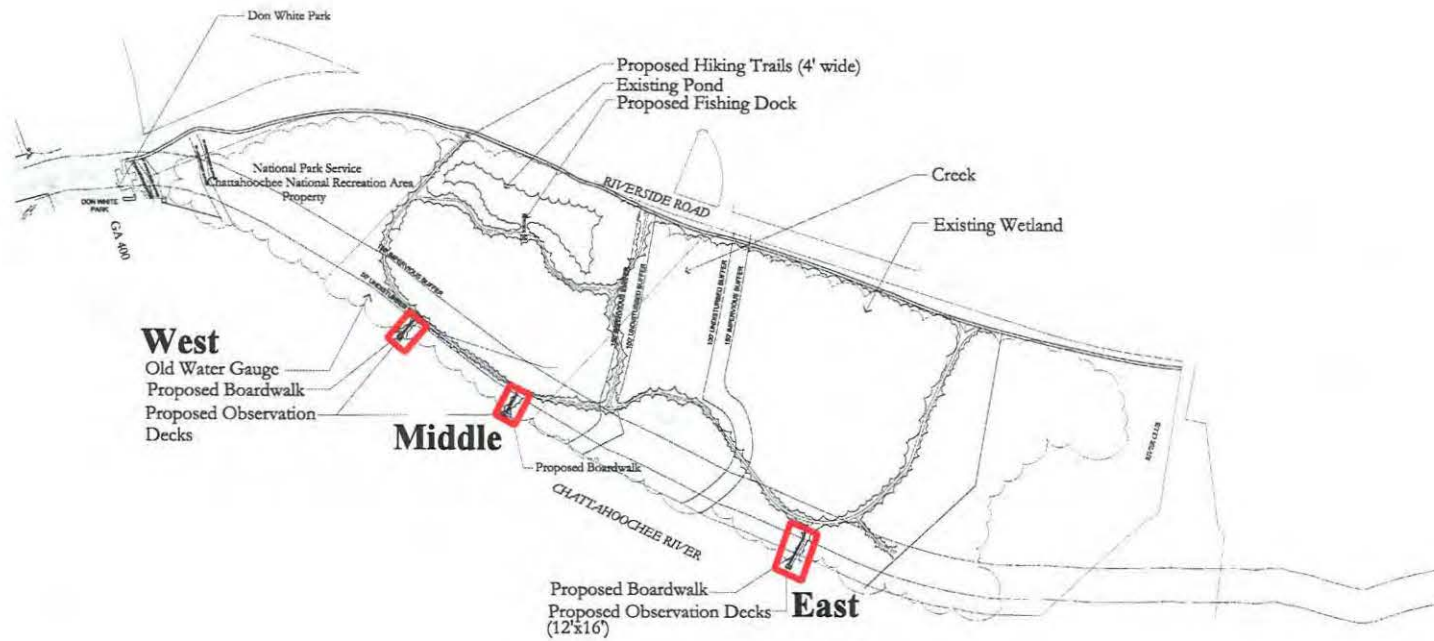
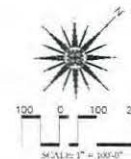


Figure 1.5 Locations of Survey Areas Within the Ace Sand Company Tract Project Area



WELLS TRACT
 ROSWELL GEORGIA
 MASTER PLAN
 SPRING 2006




 Survey Areas

Figure 1.6 Locations of Survey Areas Within the Wells Tract Project Area

1.4 Scope-of-Work

A literature and records search was conducted by Ms. Suzanne DeRosa (Senior Archeologist), followed by a cultural resources field survey. Mr. Steve Webb served as Principal Investigator. Fieldwork was conducted by Mr. Doug Tilley (Field Director). The field survey was performed from May 2-3, 2006. The report was written by Mr. Bill Jordan (Principal Archeologist). Ms. Jan Marnell prepared the graphics. Ms. Wendolyn Finney edited the report and the report was produced by Ms. Susan Wells.

The literature and records search included a review of location-specific state files and the collection of background information. The field survey consisted of archeological investigations. The archeological field survey included an intensive survey of the survey areas within each of the project areas (Figures 1.2 through 1.6). The field techniques were implemented at a level typically accepted as adequate for detecting cultural resources within the upper portions of the Georgia Piedmont physiographic zone. Data analysis included the transcription of field data for presentation in the report. Analysis was followed by a compilation of the methodological approaches, findings, conclusions and recommendations presented in the following report. The report is structured to provide the reader with an environmental and cultural orientation to the project area (Sections 2.0 and 3.0), followed by a research design (Section 4.0), methodological considerations (Section 5.0), survey results (Section 6.0), and conclusions and recommendations (Section 7.0).

1.5 Disposition of Documentary Materials

Upon approval of the final report by the HPD, a copy of the final report, field notes/maps, photographs/negatives, and pertinent ancillary documentation will be submitted to the Alabama Museum of Natural History in Moundville, Alabama for curation. This facility meets the criteria specified in 36 CFR Part 79, regarding the curation of federally-owned or administrated collections.

2.0 ENVIRONMENTAL CONTEXT

2.1 Physiographic Characteristics

The project areas lie within the Gainesville Ridges District of the Upland Georgia Subsection in the Piedmont Physiographic Province (Clark and Zisa 1976). This region is characterized by parallel, linear ridges that have a northwest to southeast orientation. According to Clark and Zisa (1976) “The courses of the Chattahoochee River and its tributaries are strongly controlled by the ridges in this district and exhibit a good example of rectangular drainage.” The ridges have gentle to steep slopes and have been incised by the streams in the Chattahoochee River basin. Elevations across the Gainesville Ridges District range from 213 meters (m) above mean sea level (AMSL) in the southwest to 472 m AMSL in the northeast section of the district. The survey areas are all in alluvial settings. The Chattahoochee River valley floor is characterized by gentle levee and terrace settings (0 to 2 percent slope).

2.2 Geology and Lithic Resources

The majority of the study area is supported by rocks of the late Precambrian to early Paleozoic Sandy Springs Group (McConnell and Abrams 1984). Quartzite, biotite gneiss, mica schist, and amphibolite are the dominant rock units underlying the area. Quartz is readily available throughout the project vicinity and was commonly used by prehistoric occupants to manufacture tools. Though sources were not observed during the current survey, another source of locally available raw material for prehistoric tool manufacture was Chattahoochee Palisades Quartzite (McConnell and Abrams 1984), which occurs naturally just north of the project area. Diabase, often used for hammerstones and axes, and occasionally for projectile points (Late Archaic period), is locally available from stream cobbles and from dikes in this area. A non-local material, Ridge and Valley (RV) chert, was imported by prehistoric groups into the study area from northwest Georgia. The closest known natural occurrence of RV chert is in east Bartow County, approximately 60 km to the west (Goad 1979). This material was particularly favored by the Early Mississippian period groups using the study area (Webb *et al.* 1997; Gresham 1987).

2.3 Pedology and Geomorphological Considerations

Existing project area soils and their conditions reflect 19th/20th century agricultural over-exploitation and severe erosion that was not brought under control until the 1930s and 1940s. In the Chattahoochee River floodplain, landform modifications have also resulted from the movement of the waters of the Chattahoochee River (Gresham 1987).

A variety of soils are present in the project areas. In general, the alluvial soils in the project areas fall within the Congaree-Chewcala-Wickham association (USDA 1958). In the Willeo Park project area, soils are

classified as Mixed Alluvium, well drained (USDA 1958). These mixed soils have been deposited on level or nearly level floodplains by running water, and vary from friable heavy silt loam to loose sand. Soil in the Azalea Park, Riverside Park, Ace Sand Company Tract, and Dan White Park consists of Buncombe loamy fine sand (USDA 1958). Buncombe loamy fine sand is made up of almost unaltered young alluvium. In the Wells Tract, soil consists of Congaree fine sandy loam (USDA 1958). This soil has a friable sandy profile, varies little in color throughout its depth, and is high in fertility.

2.4 Biotic Communities

Combined biological, historical, and geophysical (climatologic, geologic, geographic, pedologic, topographic, and hydrologic) characteristics determine the composition of an area's floral and faunal community ("biotic community"). To get an idea of how historic/prehistoric people may have interacted with and been impacted by their biotic surroundings, one must assess the area's current and former biotic constituents. This kind of analysis can yield insight on the availability, procurement, and processing of a people's resources, when considered in conjunction with their material culture.

2.4.1 Late Pleistocene-Early Holocene Communities

The environment of the North Georgia Piedmont has changed since human incursion 11,000-15,000 years ago. Paleoenvironmental reconstructions for the specific project area are not available; however, the palynological studies of Watts (1975), Delcourt and Delcourt (1980) and Sheehan *et al.* (1985) provide a general indication of early upper Piedmont environments. Table 2.1 summarizes data on the vegetation of the Northern Piedmont from about 22,000 years ago until historic times.

Table 2.1 Chronological Synopsis of Piedmont Paleoflora

Years Before Present (BP)	Probable Floral Manifestations
22,000 - 18,000	<i>Uplands:</i> patchy pine canopy; dense herbaceous cover; isolated deciduous (oak) and spruce/fir components. <i>Lowlands:</i> unknown.
18,000 - 12,000	<i>Uplands:</i> oak/hickory components increase; pines, spruce/fir components decrease; dense herbaceous cover. <i>Lowlands:</i> unknown.
12,000 - 9,000	<i>Uplands:</i> pine domination begins with later oak-hickory colonization; chestnut begins to appear; shrubs decline but herbs remain dense. <i>Lowlands:</i> pine, oak and hemlock dominate; isolated spruce/fir; river birch, sycamore, and alder dominate stream sides.
9,000 - 4,000	<i>Uplands:</i> oak replaces pine in association with gums, chestnut and beech; hickory declines; herbaceous cover is minimal; forest very dense. <i>Lowlands:</i> spruce/fir, pine and hemlock disappear; oak, gums, hickory and other broad-leaves dominate.
4,000 - 1,320	<i>Uplands:</i> domination fluctuates among oak, pine and chestnut; hickory continues to decline. <i>Lowlands:</i> oak, ash, sycamore and basswood dominate.

1,320 - present

Uplands: arboreal thinning (from agriculture and silviculture) implied by increase in alder and ragweed.
Lowlands: previous dominants gradually decrease; maize/agricultural weeds appear; late increase in sweet gum and hickory.

Please note the following important points regarding Table 2.1: 1) Interpretations are only generally applicable to the project area; 2) Sheehan *et al.* (1985) indicate that in their study area, pine species do not reach the level of dominance that has been shown for other parts of the Southeast; and 3) 19th and 20th century erosion and sedimentation have probably changed the character of the project area, and have likely resulted in shrinking or expanding biotic community ranges.

Flora: Approximately 12,000 BP – around the time Paleoindian peoples entered the Northern Piedmont (15,000-11,000 BP) (Anderson *et al.* 1990) – warmer summers, colder winters, and increased precipitation prompted consistent mesic oak/hickory forests to begin overtaking the Southeast’s existing scattered parklands and patchy boreal pine/spruce forests. Compared to its predecessor, the mesic forest furnished people with more diverse, likely more accessible floral and faunal resources – perhaps still including the dwindling populations of Pleistocene megafauna. As the climate continued warming, but became more arid around 9,500 BP, Early Archaic populations witnessed modern upland oak/pine, and modern Piedmont lowland broad-leaf forests gradually replacing the mesic forests. Modern biotic patterns had emerged by 7,000 BP under the influence of these hotter, dryer conditions. This climatic trend maximized during the Middle Archaic, then around 5,000 BP, it reversed. Pine/hardwood forests benefitted from the cooler, moister conditions, and proliferated in upland plant communities. Similarly, expansive mixed-hardwood environments flourished in the Southeast’s more hydric locales. This climate and vegetation remained through modern times.

Fauna: While modern Piedmont plant communities developed, concurrent establishment of transient and resident faunal patterns occurred. Pleistocene megafaunal species of *Equidae*, *camelidae*, and *proboscidea*, among others, inhabited the Southeast until their extinction around 10,000 BP, but the role they played in Paleoindian cultures is uncertain (Anderson *et al.* 1990). As climatic and botanical conditions approached those we experience today, megafaunal species died off and smaller modern animals proliferated (Anderson *et al.* 1990). The most important faunal species to prehistoric and early historic inhabitants of the Piedmont were white-tailed deer, wild turkey, migratory fowl (including the extinct passenger pigeon), small mammals, and aquatic resources.

2.4.2 Modern Environments

Wharton (1978) suggests that since plant communities are closely associated with underlying physical elements, it is often possible to reconstruct floral patterning in a disturbed area by using data collected from similar settings. Although few pristine plant communities remain in the immediate project vicinity, some basic reconstructions can be made by correlating personal observations with Wharton’s (1978)

hydric/mesic/xeric community classification system. Included with these reconstructions are inventories of common faunal residents and visitors. Excluding changes caused by human interference, the plant and animal communities described below have likely existed in the project area since about 4,000 BP.

Modern River and River-side Environments: Along the Chattahoochee River, the dominant canopy species include river birch, sycamore, and green ash. Floodplain canopies are composed of swamp chestnut oak, water oak, willow oak, butternut hickory, cottonwood, honey locust, southern sugar maple, red maple, and green ash. Understory vegetation consists of hackberry, river cane, dogwood, and possum haw. Ground cover includes poison ivy, poison oak, rattan vine, muscadine, spiderwort, jewelweed, wild potato, false nettle, and a variety of other herbs (Wharton 1978).

Floodplain mammals include raccoon, muskrat, various mice/shrews, beaver, and white-tailed deer. Avian residents include various warblers, flycatchers, gray kingbird, red-bellied and pileated woodpecker, and prothonotary warbler. Migratory birds include robin, blackbird, black duck, mallard, wood duck, red-shouldered hawk, and barred owl. Various frogs/toads; mud, musk, river, and box turtles; salamanders; brown water snake; and others comprise the floodplain reptilian community (Wharton 1978).

Fish common to the Chattahoochee River include various suckers, darters, shiners, pickerels, bullheads, channel catfish, various sunfish, various bass, trout, and perch. Benthic inhabitants may include gastropods, pelecypods, and decapods (Wharton 1978).

2.5 Climate

The modern climate of the project area is characterized as warm and humid, with warm summers and cool winters. Average temperatures range from 44.7° F in January to 78.7° F in July. The annual mean temperature is 61.4° F, with an average growing season of approximately 220 days. Precipitation averages from 6.4 cm in October to 15.4 cm in March, with an annual mean of 125.0 cm. Precipitation is well-distributed throughout the winter, spring, and summer months (USDA 1958).

2.6 Historic Alteration of the Environment

While Native American groups modified the biotic communities along the Chattahoochee River Valley to varying degrees over the millennia, this was insignificant compared to the changes that were set into motion by Euro-American settlers during the early 19th century. One of the most significant and earliest changes was the establishment of the Federal Road during the first decade of the 19th century. The Federal Road, which crossed the Chattahoochee River at Orrs Ferry (i.e., Georgia Highway 20 crossing) significantly spurred settlement in North Georgia after the 1819 Land Lottery.

During the 1820s and 1830s, small agricultural plots were cleared, followed by extensive logging and clearing. From the 1830s through the 1850s, much of the productive land was under cultivation, including nearly all of the arable alluvial lands. By the 1870s, Piedmont soils were exhausted as a result of repetitive monocultural farming and severe erosion. By 1880, there was a resurgence in Piedmont agriculture that resulted in the clearing of marginal lands and the application of fertilizers to exhausted lands. By the early 1900s unprotected lands were once again subject to severe gully and sheet erosion, the effects of which are still evident today in the project area. In the 1920s and 1930s, soil conservation efforts in the form of terracing and contour farming were under way. Today, soil terraces are a common sight throughout the uplands of the study area.

A great deal of late 20th century development is adjacent to the project areas. Residential and commercial development are located near the project areas. Existing recreational facilities and associated improvements are located in and near some of the survey areas.

3.0 CULTURAL CONTEXT

3.1 Archival Sources

Background data on the project area were gathered from the following repositories:

- Georgia Archeological Site files, University of Georgia, Athens (UGA)
- Laboratory of Archeology, UGA
- Main Library and Science Library map room, UGA
- HPD, Georgia Department of Natural Resources, Atlanta
- Georgia Department of Archives and History, Atlanta
- Georgia Surveyor General's Office, Atlanta

At the Site Files, the official files and maps were examined, followed by a review of the pertinent new site form files and the Laboratory of Archeology manuscript/report files. General references were reviewed at the UGA Main Library. At the HPD, pertinent compliance document files, official maps, and NRHP/pending files, as well as Fulton County historic structures survey files were reviewed. At the State Archives and Surveyor General's office, Fulton County histories and maps were studied for trails, roads, structures, and cemeteries. The 1832 Cherokee Land Lottery plat books were also examined.

The following primary resources were used to search for historic resources within the project area:

- 1832 Cherokee County, Second Section, District 1, Land Lots 272, 273, 292, 379, 418, 458, 494, 497, 532, and 534 (plats for some of the multiple dock areas were not available)
- *The Official Military Atlas of the Civil War* (Davis *et al.* 1983)
- 1867 A. Green Map of Milton County
- 1867 N.C. Barnett, Secretary of State Map of Milton County
- 1871 W. Phillips map of Milton County
- 1894 (reprinted 1907) Suwanee, Georgia Quadrangle
- 1895 (reprinted 1926) Atlanta, Georgia Quadrangle
- 1930 Milton County Board of Commissioners
- 1932 U. S. Postal Route Map of Fulton County
- 1932, 1940, and 1949 E.W. Robert Maps of Fulton County
- 1940, 1947, 1954, and 1974 Georgia Department of Transportation Maps of Fulton County
- 7.5 Minute USGS Sandy Springs, Georgia Quadrangle, surveyed 1955 (photorevised 1968, 1973, and 1993)
- 7.5 Minute USGS Roswell, Georgia Quadrangle, surveyed 1956 (photorevised 1973 and 1992)
- 7.5 Minute USGS Mountain Park, Georgia Quadrangle, surveyed 1956 (photorevised 1973)

3.2 Previous Investigations

During the last 50 years, surveys along the main valley of the upper Chattahoochee River (Keith *et al.* 1999; Webb *et al.* 1997; Webb *et al.* 1998; Webb and Duncan 1997; Gantt and Webb 1996a, 1996b, 1996c; Markham and Holland 1996; Gresham 1987; Rudolph 1980; O'Grady and Poe 1980; Hamilton 1974; Caldwell 1953; Wauchope 1966) have chronicled the intensity with which the valley was occupied by prehistoric groups. Less has been done to document historic settlement and use (Brown 1980; Gresham 1987; Webb *et al.* 1996a; 1996b).

Wauchope (1966) conducted the first large scale archeological survey in north Georgia during the 1930s, traveling the floodplains of all the major streams including the Chattahoochee River. Wauchope (1966) visited several prehistoric village sites along the Chattahoochee River near the project area, including Sites 9FU4 and 9FU6. Site 9FU4, the Big Creek Site, was reported as an Early Woodland site, situated on a ridge near the mouth of Big Creek (Vickery Creek). Site 9FU6, the Thomas Site, is a large Middle Woodland village site bisected (possibly) by State Route 9, north of the Chattahoochee River. The exact location of this site has not been documented since Wauchope's initial field visit in the 1930s.

Three studies involved the survey of National Park Service (NPS) lands along both sides of the Chattahoochee River below Buford Dam [a length of 123 km (48 miles)]. Hamilton (1974) conducted a reconnaissance survey of selected NPS tracts, recording three new sites and relocating four previously recorded resources. Archaic, Woodland, and Mississippian period components were reported. In addition, Hamilton (1974) identified the location of 19th century Orrs Ferry and Road at the present-day Georgia Highway 20 river crossing.

Segments of the 123-km-long NPS Chattahoochee River Recreation Area were later intensively surveyed by O'Grady and Poe (1980), resulting in the identification of 70 sites, including: rock shelters, open-air prehistoric ceramic and lithic scatters (Archaic and Woodland components represented), Protohistoric and Historic Native American villages and hamlets, and 19th/20th century Euro-American sites. Seven sites (NPS-19, 20, 21, 22, 30, 64 and 65) were identified in the Big Creek area. Site 9FU108 (NPS-19), Lover's Leap rockshelter, produced stratified Archaic, Woodland, and Protohistoric artifacts, with radiocarbon dates of 400+/-120 years before present (BP). Site 9FU109 (NPS-20) was reported as a small rockshelter with Archaic through Protohistoric components. Site 9FU332 (NPS-21) is a small rockshelter without artifacts, located on a bend in the river. Site 9FU238 (NPS-22) is a dam across Big Creek near its confluence with Hog Wallow Creek (Oxbo Creek). The dam was associated with the pre-Civil War factory complex in the area. Historic rock quarries were identified at Site 9FU239 (NPS-30) and Site NPS-65 (9FU108?). Site 9FU228 (NPS-64), is Ivy Mill, a middle 19th through early 20th century mill site located on the north bank of the Chattahoochee River at the mouth of Big Creek.

In 2003, RSWA (Jordan 2003) conducted a Phase I archeological survey of 39 tracts within 12 National Park Service (NPS) Units of the Chattahoochee River National Recreation Area in Cobb, Forsyth, Fulton, and Gwinnett Counties. In total, 27 archeological sites and four isolated finds were recorded. The locations of 14 previously recorded sites believed to be in or near the project areas were revisited. As a result of this survey, prehistoric occupations from the Middle Archaic, Late Archaic, Early Woodland, Late Woodland, Early Mississippian, and Protohistoric/Historic Cherokee periods were identified. Historic occupations ranged from the early 19th to the middle 20th centuries.

Ivy Mill (9FU228) was revisited by Southeastern Archeological Services (SAS) and RSWA (Gantt 1997). During an SAS survey of the Riverside Road pump station and associated pipeline corridors, the tail race and peripheral stone features within the Ivy Mill complex were relocated (Rogers 1991). This survey also identified a large prehistoric site (FS-1) with significant Late Archaic and Mississippian components. Rogers indicated that this site was related to previously recorded Sites 9FU4 and 9FU25. According to the State Site Files, the location of Site 9FU25 had been originally recorded by John Wayt in 1978, but there was no mention of site type or cultural affiliation on the form. Testing of Site FS-1/9FU4 revealed that the prehistoric component had been severely disturbed; the site was recommended ineligible for the NRHP (Ledbetter 1991).

Ivy Mill was researched and delineated during an intensive survey of a 15-acre tract encompassing the proposed improvements to the State Route 9 and Azalea Drive/Riverside Drive intersection (Braley *et al.* 1992). Based on the archival and field investigations, the Ivy Mill site was recommended eligible for the NRHP. The RSWA survey of the area west of the main mill complex, underneath and west of the bridge, revealed severe disturbance from sewer line and bridge/road construction (Gantt 1997). No artifacts or features were observed in this area.

In addition to Ivy Mill, the RSWA survey (Gantt 1997) recorded 15 other archeological resources along the State Route 9 corridor, located west and southwest of the project area. These include: seven 19th-20th century house sites/complexes with associated artifact scatters/features (Sites 9FU226, 9FU279, 9FU283, 9FU285, 9FU286, 9FU288, and 9FU289); four 19th through 20th century artifact scatters (Sites 9FU280, 9FU281, 9FU282, 9FU284); one middle 19th through 20th century discard area (9FU287); one middle 19th through 20th century church cemetery (9FU278); one historic (19th century) isolate; and one prehistoric isolate. An historic resource, a late 19th century railroad bed in the area of previously recorded Site 9FU6, was also identified during the course of the archeological resources field survey.

Another study in the project vicinity by RSWA concentrated on the intersection of Grimes Bridge Road and Big Creek (Gantt, 2003). This survey recorded two archeological sites: Site 9FU459, a bridge; and 9FU460, a retaining wall.

Survey and testing were conducted upstream on Vickery/Big Creek from Ivy Mill at the location of the first cotton mill built in Roswell (Wood 1989, 1993). The archival and field survey identified the ruins of the 1839 (9FU234) and 1854 (9FU205) cotton mills, the 1882 turbine, an 1850s machine shop, a headrace, a tailrace, and a dam. Testing revealed a series of wall foundations and a mortared floor associated with the 1839 mill and the 1882 renovations. Based on the findings, it was estimated that over two-thirds of the 1839 factory is buried under the hillside west of the site.

In 2000, RSWA surveyed a total of 1.5 miles of corridor for a new trail system at the Island Ford Unit of the Chattahoochee River National Recreation Area (Gantt and DeRosa 2000). Two previously recorded sites, 9FU36 and 9FU240, were revisited, and six sites were recorded as a result of this study. Site 9FU36 (O’Grady and Poe 1980) is a rock shelter on a slope overlooking the Chattahoochee River. Site 9FU240, a prehistoric lithic scatter with a historic period component, was also initially recorded by O’Grady and Poe (1980). Six previously unrecorded sites were identified as a result of the Gantt and DeRosa (2000) survey at Island Ford, including two rock shelters (9FU390 and 9FU391), four lithic scatters, and a historic period stone terrace. A single diagnostic prehistoric artifact indicates Woodland period occupation at 9FU388.

3.3 Cultural History

The discussion of prehistory is based on current research in the surrounding area. Six periods are discussed: Paleoindian (12,000 to 9,800 BP), Archaic (9,800 to 3,000 BP), Woodland (3,000 to 1,100 BP), Mississippian (1,100 to 450 BP), Protohistoric and Historic Native American (1540 to 1838 AD), and the history of the study area since 1820. Table 3.1 summarizes the cultural periods/temporal ranges and cultural manifestations.

Table 3.1 Cultural Chronology for North Georgia

Temporal Period (BP)	Cultural Manifestations
Paleoindian (12,000 to 9,800 BP):	Clovis/Folsom, Quad, Cumberland, Dalton
Early Archaic (9,800 to 7,800 BP):	Big Sandy, Kirk/Palmer, Bifurcates, Kirk Stemmed
Middle Archaic (8,000 to 5,000 BP):	Stanly, Morrow Mountain, White Springs
Late Archaic (5,000 to 3,000 BP):	Benton, Savannah River, Soapstone, Otarre, Wade
Early Woodland (3,000 to 2,300 BP):	Kellogg, Post-Kellogg
Middle Woodland (2,300 to 1,500 BP):	Cartersville
Late Woodland (1,500 to 1,100 BP):	Swift Creek/Napier, Woodstock
Early Mississippian (1,100 to 800 BP):	Etowah
Middle Mississippian (800 to 650 BP):	Wilbanks
Late Mississippian (650 to 400 BP):	Stamp Creek, Mayes, Brewster
Protohistoric/Early Historic (AD 1600 to 1800):	Late Lamar, Exploration, Colonial
Historic Cherokee (AD 1650 to 1838):	Galt
Historic (AD 1820 to 1940):	Federal, Civil War, Reconstruction, Early 20th Century

3.3.1 Paleoindian Period

Paleoindian period sites are exemplified by the presence of fluted and unfluted, lanceolate projectile points (Clovis/Folsom, Quad and Cumberland), and occasionally unifacial scrapers, drills, and knives (Griffin 1967; Funk 1978; O'Steen *et al.* 1983). While this artifact assemblage has been associated with extinct Pleistocene megafaunal species in the Southwest and Great Plains regions, it was not until relatively recently that such an association between Paleoindians and megafauna here in the Southeast could be made (Anderson *et al.* 1996). Evidence of this association from Florida includes a speared giant tortoise from Little Salt Springs (Clausen *et al.* 1979) and a projectile point embedded in a *Bison antiquus* skull recovered from the Wascissa River (Webb *et al.* 1984), as well as artifacts manufactured from megafaunal ivory and bone (Anderson *et al.* 1996). In Tennessee, Paleoindian artifacts have also been recovered in association with megafaunal species (Barker and Broster 1996). However, the exact relationship between Paleoindians and megafauna in the Southeast is still largely unknown. Much of the paleobotanical and paleofaunal evidence suggests that Paleoindian groups in the eastern United States enjoyed a rather diverse diet.

Anderson *et al.* (1990) state that, environmentally, the period from 12,000 to 10,000 BP was one of great change. The patchy boreal forest was replaced by a homogeneous mesic hardwood forest. Under these circumstances, Paleoindian groups are thought to have initially exploited the area under a logistically-oriented settlement/subsistence pattern (Anderson *et al.* 1990). As the mesic canopy developed and closed, and biotic resources became more evenly distributed, it has been postulated that Paleoindian groups were forced into foraging adaptations that are more clearly documented for the Archaic period (Anderson *et al.* 1990). Anderson *et al.* (1990) note that four different Paleoindian site types are recognized or are likely to be recognized in the Georgia Piedmont: 1) short-term camps; 2) quarry camps; 3) residential camps; and 4) kill sites.

If, over time, Southeastern Paleoindian groups shifted to a mixed foraging settlement/subsistence mode, it is expected that there should be evidence of this shift. Along the upper Oconee River, O'Steen *et al.* (1989) report early to late Paleoindian settlement expansion from river terrace and upland edge settings to those including upland/inter-riverine settings. These findings suggest that in the Southeast, Paleoindian people might have led a life more dependent on a wider diversity of fauna and flora than in other parts of the United States.

By the close of the Pleistocene, climatic changes had brought about shifts in flora and fauna. Megafaunal species gave way to smaller modern species and modern plant communities emerged. These environmental changes are reflected in the material remains of the Dalton Horizon. Dalton is characterized by broad concave-based, shallow side-notched projectile points with varying degrees of basal and lateral grinding. It is believed that the first significant population movement into the southern Piedmont region took place

during this period (Goodyear 1982). As for the Georgia Piedmont, O'Steen *et al.* (1989) indicate that Dalton sites occur in both riverine and inter-riverine settings, but are most prevalent within upland settings.

3.3.2 Archaic Period

The Archaic period is split into three major subdivisions: 1) Early; 2) Middle; and 3) Late. These divisions are defined by the occurrence of specific types of projectile points and assemblages that are distinctly associated with particular adaptive strategies.

During the Early Archaic (9,800 to 7,800 BP), subsistence/settlement adaptations developed in response to the effects of Early Holocene warming. A possible response to these changes was that Early Archaic projectile points (Bolen, Big Sandy, Palmer, Kirk, and LeCroy) became more variable in form compared to those made during Paleoindian times. Similarly, the Early Archaic tool kit expanded to include not only animal processing tools, but also a wider range of more advanced vegetal processing tools [i.e., choppers, adzes, and grinding stones (Griffin 1967)].

Anderson and Hanson (1988) suggest that Early Archaic adaptations were probably made under a mixed forager/collector subsistence strategy. Under this strategy, it has been posited that Early Archaic populations were quite mobile and organized in bands of 50 to 150 individuals that ranged along particular drainage basins. The Chattahoochee River basin lies on the boundary between Anderson and Hanson's (1988) theorized "Tennessee River/Cumberland Plateau" and "South Atlantic" macroband areas. Based on this seasonal mobility model, Early Archaic peoples are expected to have spent the summer/fall months in Piedmont foraging camps and the winter/spring months at residential sites in the warmer regions of their territory. The archeological implication of the Anderson-Hanson model for the study area is that foraging camps would have reflected the highest level of group organization (i.e., short-term habitation sites). From these camps, excursions into a surrounding foraging zone would have resulted in archeologically detectable locations where biotic or lithic resources were extracted and/or processed.

In the Piedmont, the Middle Archaic (8,000 to 5,000 BP) is believed to represent a period of human dispersion and technological generalization, perhaps in response to climatic changes that left the Piedmont dryer and warmer than in earlier times. Middle Archaic peoples have been depicted as residentially mobile bands, exploiting a relatively homogeneous Piedmont environment by hunting, collecting, and foraging, an exploitative strategy referred to as "adaptive flexibility" by Blanton and Sassaman (1989). The formulation of this flexible settlement/subsistence regime is based on the detection of Middle Archaic artifacts across a wide range of Piedmont environmental settings (e.g., Ledbetter *et al.* 1987).

Middle Archaic assemblages are usually quite homogeneous, containing high frequencies of debitage, expedient tools, and relatively few curated tools. Assemblages range from low-density artifact scatters

covering less than 100 square meters (probable foraging stations), to high-density specialized extraction sites (quarries), to high-density artifact scatters covering thousands of square meters (probable residential bases or foraging camps). Middle Archaic sites are typified by an almost exclusive use of local raw lithic materials. Being most readily available, quartz was the most frequently used lithic material in the Georgia Piedmont during the Middle Archaic.

Artifacts typical of the Middle Archaic in the Piedmont include Stanly and Morrow Mountain projectile point types (Coe 1964). Morrow Mountain is undoubtedly the most common Middle Archaic point type found in the project vicinity and the Piedmont, while the earlier Stanly type is fairly rare in the Chattahoochee River basin. Recent excavations at Site 9DW64 in Dawson County (Webb 1998) revealed a Morrow Mountain occupational surface dating to 6,200 BP and bearing two relatively distinct and formal Morrow Mountain point types that correspond to Coe's (1964) Morrow Mountain I and II varieties. This occupational surface also produced a number of formal triangular bifaces similar to the Paint Rock Valley point type (Cambron and Hulse 1983).

Elliott (1986) notes that soapstone exploitation in Georgia probably originated during the Middle Archaic and was used to manufacture atlatl (spear-thrower) weights. There may be a correlation between the development of the atlatl and the appearance of medium to large, narrow stemmed point types, as Sassaman *et al.* (1990) have intimated.

The Late Archaic (5,000 to 3,000 BP) was marked by much population growth and local adaptation. Site distribution and assemblage data indicate that Late Archaic peoples settled and survived within a more residential/task camp pattern than Middle Archaic peoples. Limitations are likely to have resulted from territorial circumscription precipitated by population growth and increasing societal complexity. Circumscription would have encouraged continual refinement of hunting/gathering techniques, as well as increasing inter- and intra-group social complexity.

In general, long-term, substantial, Late Archaic residential bases are often found on large stream terraces and low ridge landforms rather than inter-riverine ridges and knolls (DePratter 1975; Ledbetter *et al.* 1987; Anderson and Joseph 1988). These residential bases are complemented by specialized extractive sites where specific resources were being procured or hunted. Specialized sites include biotic and lithic procurement stations and camps, which were probably located near other resources to maximize productivity.

For the Savannah River Valley, Sassaman (1991) organizes Late Archaic sites into five categories: 1) riverine shellfish-bearing habitations; 2) riverine non-shellfish-bearing habitations; 3) riverine limited-activity locations; 4) upland habitations; and 5) upland limited-activity locations. Based on the investigation of these various Late Archaic site types, Sassaman (1991) suggests that Late Archaic peoples aggregated at varying social levels (e.g., band, tribe, etc.) during the spring and summer months around confluences of major

tributaries. In the fall and winter months, Late Archaic people dispersed into upland tributary-related settings.

The frequency of artifacts related to vegetal processing increases during the Late Archaic, as does the presence of waste shell at sites along some of the major waterways. This period is characterized by the production of large-stemmed projectile point types (Savannah River, Wade, Ledbetter, Otarre), highly-variable medium-stemmed point types, and a wide range of groundstone items.

About 3,500 BP, soapstone artifacts began to appear regularly. This phenomenon continued into the succeeding Early Woodland period, until about 2,800 BP. Being an easily-worked raw material, soapstone was used by Late Archaic peoples to manufacture atlatl weights, bar gorgets, pipes, cooking slabs, and "nutting" stones. Soapstone was also commonly fashioned into hemispheric, flat-bottomed, conical and elongated cooking bowls of varying sizes (Elliott 1986).

Fiber-tempered pottery first appears in the Georgia and South Carolina coastal regions about 4,500 BP (Stoltman 1966) and continues to about 2,500 BP. In the Piedmont, fiber-tempered ceramics began to appear along the Savannah River about 4,500 BP (Sassaman 1993). While a rare occurrence further inland, fiber-tempered ceramics have recently been documented in Henry and Cherokee Counties (Webb *et al.* 1994 and Webb and Gantt 1995).

3.3.3 Woodland Period

Early Woodland (3,000 to 2,300 BP) sites retain many Late Archaic characteristics, however, a number of important changes occurred: ceramic manufacture and use increased greatly; burial mounds and well-furnished burials began appearing during the Early Woodland, connoting increased social complexity and stratification; and Southeastern population growth further limited group mobility, encouraging not only mixed hunting and intensive collecting subsistence/settlement strategies, but also increased horticultural development. Early Woodland residential bases and village-like settlements are most often found in alluvial settings, and appear to be multi-seasonal (Ledbetter *et al.* 1987). Resource-extractive sites, hunting stations and camps are more opportunistically located, often at environmental interfaces.

Since they were less mobile, Early Woodland populations were increasingly required to reuse specific resource extraction locations. Dependence on resources within a much smaller local area mandated development of organized, systematic methods for their use and management. Evidence of such practices and/or incipient horticulture is common at Early Woodland sites (Wood 1981); however, use of cultigens during this period remains controversial (Wood and Bowen 1995). The social organization necessary to exploit and manage limited resources, as well as to construct the mounds and earthworks often found at Early Woodland sites, most likely occurred in the form of structured political units.

An increase in ceramic production followed the changing cooking and storage needs of new collecting/horticultural or semi-agricultural subsistence practices. The wide assortment of materials, forms, and decorations found in ceramics often allows these artifacts to be extremely accurate indicators of the time, place, or culture from which the pottery originated. The most characteristic Early Woodland (Kellogg Phase) ceramics in the Georgia Piedmont are Dunlap fabric-impressed wares (Garrow 1975). Other pottery types include Mossy Oak cord-marked and Mossy Oak simple-stamped (Wood and Bowen 1995). The Post-Kellogg Phase, toward the end of the period, is characterized by the appearance of Cartersville check-stamped wares in association with Dunlap wares.

Early Woodland residential sites [e.g., the Kellogg Site (9CK62) and Noonday Creek Site (9CK130)] contain storage pits, rock hearths, diverse artifact assemblages, seasonally-specific subsistence remains, and evidence of structures (Caldwell 1957; Bowen 1982). The seasonally-occupied sites are characterized by a more homogenous artifact assemblage, smaller size, and seasonally-specific (i.e., late summer and fall) subsistence remains (Wood and Bowen 1995). Associated projectile points are typically medium-sized and triangular (Yadkin, Badin, Greenville and similar types), although stemmed points may also occur. Other common artifacts include biconcave mortars, manos, and boatstones (Wood and Bowen 1995).

In the Georgia Piedmont, the Middle Woodland period (2,300 to 1,500 BP) is represented by sparse artifact scatters, hamlets, villages, and occasional mound-bearing villages. Middle Woodland villages and hamlets are often located on relatively large floodplains or low ridges near stream confluences where emergent horticulture could have been effectively practiced. Camps and extractive sites occur along environmental interfaces.

Ceramics typically associated with Middle Woodland sites include Cartersville plain, simple-stamped, and check-stamped wares. Swift Creek ceramics may occur in low frequencies, but Dunlap pottery is absent. Medium to small triangular projectile points are present, as are spike-like and small to medium-stemmed points.

Two sites with major Cartersville components, the Guess Site (Site 9CO60) and Site 9CO35, were partially excavated by Caldwell and Miller in the late 1940s (Caldwell 1957; 1958). These sites are located in Allatoona Lake near the confluence of Allatoona Creek and Little Allatoona Creek. A better documented Middle Woodland village site (Site 9FU14) is located in Fulton County on the Chattahoochee River floodplain. This site contained 20 to 25 circular structures with centrally-located, surface-rock hearths (Kelly and Meier 1970).

Middle Woodland earthen mounds can contain graves furnished with high-status items of exotic materials. This suggests the development of clearly-defined religious belief systems and involvement in a complex trade network. At the Tunacunnhee Site in Dade County, Georgia, Middle Woodland groups constructed burial

mounds of earth and stone (Jefferies 1976). These mounds yielded copper pipes, stone effigy pipes, cut mica, and other ceremonial items. Another site with possible trade network ties is the Anneewakee Creek Mound Site in Douglas County. This site contained artifacts of exotic material and manufacture and evidence of log tombs (Dickens 1975).

In north Georgia, the Late Woodland was traditionally defined by high relative frequencies of Swift Creek and Napier complicated-stamped ceramics (Rudolph 1991) marking the Swift Creek/Napier Phase (1,400 to 1,250 BP). There is growing evidence that Woodstock Phase (1,300 to 950 BP) complicated-stamped and incised ceramics may be late markers for this period (Stanyard and Baker 1992; Webb in progress).

In the upper Georgia Piedmont, Late Woodland sites often contain a suite of Swift Creek wares known as Complex B Swift Creek. These ceramics exhibit design attributes from both Swift Creek and Napier traditions in the same motif. Most of the design elements are curvilinear like Swift Creek, but have the fine line execution and vessel morphology of Napier wares (Rudolph 1991). Woodstock ceramics include distinctive barred-diamond/barred-oval complicated-stamped, line-block stamped, herringbone stamped, incised and incised/punctate designs that have clear stylistic ties to Napier and Etowah.

Small triangular points (Hamilton-like) appear with great frequency during the Late Woodland and continue into the Mississippian period. Introduction and spread of the bow and arrow is usually attributed to this period based on the appearance of much smaller, triangular (Hamilton-like) projectile points which continue into the Mississippian period (Bense 1994). However, later Early Woodland, or Middle Woodland medium-to-small triangular projectile points may suggest an earlier development of this technology (Oliver 1985:209).

Swift Creek/Napier sites range from small ceramic scatters, to small village/hamlet sites, to occasional mound complexes. Residential sites are often located on tributary systems, while mound centers are often on larger streams. Swift Creek/Napier mound complexes along the upper Chattahoochee River include Anneewakee in Douglas County and Cold Springs in Greene County. Dickens (1975) viewed these as forerunners of the ceremonialism that would culminate during the Mississippian period. A recent re-evaluation of ceramics and documentation from the Summerour Mound (9FO16), now in Lake Lanier, led Pluckhahn (1996) to place this mound site in the Swift Creek/Napier temporal range.

Structural remains at Swift Creek/Napier sites suggest that settlements were small. Good examples of Swift Creek/Napier settlements include Simpson's Field (Site 38AN8) along the Savannah River (Wood *et al.* 1986) and Site 9HY39 along the Towaliga River in Henry County (Webb *et al.* 1994). Simpson's Field yielded Napier and Swift Creek ceramics, earth ovens, pits and burials, as well as corn and squash remains. At Site 9HY39, earth ovens, storage pits and warm-weather structures were reported in association with Swift Creek and Napier ceramics. Cultigens (squash) and native garden crops (maygrass, chenopodium, sunflower, etc.) were also recovered from Site 9HY39.

Whether classified as Late Woodland or Early Mississippian, the Woodstock Phase represents a transition between Late Woodland Swift Creek/Napier and classic Mississippian culture. It is during this time that some Mississippian traits (i.e., large truncated mounds with attendant ceremonialism, maize-dependent agriculture, palisaded villages) became more notable. Woodstock sites tend to be larger and represent more complex and permanent occupations than the earlier Swift Creek/Napier sites. Dickens (1964) noted that Woodstock sites were often located near or within expansive alluvial settings. Ledbetter *et al.* (1987) indicate that in the Allatoona Lake vicinity, Woodstock sites tend to be located on alluvial terraces or on upland areas contiguous to the Etowah River floodplain. Gresham (1987) drew a similar conclusion for Woodstock sites along the Chattahoochee River just below Buford Dam.

3.3.4 Mississippian Period

Mississippian period cultures further elaborated on the practices of the Woodland period. As the Mississippian period unfolded, there is strong evidence for organization at the chiefdom level (Hally and Rudolph 1986; Hally and Langford 1988; Williams and Shapiro 1990). Large villages developed, truncated temple mounds were constructed and relatively large socially-stratified societies were ruled by an elite class. There is also evidence of high ceremonialism and an agricultural subsistence base. It has been posited that populations increased to the point that intra-regional competition for agriculturally-useful land probably resulted in war [i.e., villages were palisaded, (Larson 1971; 1972)]. Most likely, overpopulation, competition and war led to the eventual deterioration of social and religious structure, forcing population dispersion.

Hally and Rudolph (1986) characterize Mississippian settlement within the Piedmont as being most intensive along streams with expansive, arable floodplains like the Chattahoochee River. These villages, sometimes containing ceremonial mound centers, were complemented by a wide variety of smaller villages and resource-extractive sites in the surrounding lowland and upland areas. Along some major drainage systems during the later phases of the Mississippian period (e.g., tributaries to the Oconee River and headwater regions of the Chattahoochee River), small hamlets and farmsteads occupied any suitable landform associated with arable land.

Etowah Phase (950 to 800 BP) culture is exemplified by the type site (Site 9BR1) in Bartow County, Georgia, even though much of the ceramic seriation used to subdivide the phase was developed through work at other sites (Hally and Rudolph 1986). This phase is poorly understood in the upper Chattahoochee River area. Along the upper Savannah River, it is known as Jarrett and has a temporal span of approximately 900 to 800 BP (Williams and Shapiro 1990). Etowah ceramics exhibit Woodstock influence, but tend to contain a blend of curvilinear and rectilinear complicated-stamp designs (Ledbetter *et al.* 1987). Incision and painting are also observed on Etowah Phase vessels. Etowah Phase sites include mound centers with villages, hamlets and camps. Etowah sites are primarily located in alluvial settings with access to arable floodplains for farming.

The Wilbanks Phase (750 to 625 BP) succeeded Etowah/Jarrett and is the Savannah Period manifestation in north central Georgia. Beaverdam (800 to 700 BP) is the Savannah equivalent in the upper Savannah River region. Savannah ceramics are characterized by curvilinear complicated-stamped designs of crossed or barred circles, sets of concentric circles and combined circles. "Wilbanks" ceramics have bolder design elements than Savannah wares and exhibit both curvilinear and rectilinear complicated-stamp patterns. King (1997) characterizes Early Wilbanks (750 to 675 BP) and Late Wilbanks (675 to 625 BP) Phases in the Etowah River Valley. This distinction is based on the presence of a particular group of ceramic characteristics only observed in the Late Wilbanks Phase (i.e., Rudder Comb Incised, the circle/cross motif, peaked and noded rim forms).

Wilbanks Phase sites include the high ceremonial center of Etowah (Site 9BR1), mound/village complexes [e.g., in Forsyth County, Summerour (Site 9FO16) and possibly Site 9FO218], hamlets and farmsteads. Some villages had defensive palisades. Ledbetter *et al.* (1987) state that Savannah/Wilbanks sites are found at about the same frequency in alluvial and low ridge settings. This suggests a shift away from the settlement of alluvial surfaces observed for earlier Mississippian period groups.

After Wilbanks came the broad cultural manifestation known as Lamar (650 to 320 BP). Archeologists have analyzed the relationships among Lamar sites within the Georgia Piedmont and posited a sociopolitical structure at the chiefdom level (Smith and Kowalewski 1980; Rudolph and Blanton 1981; Hudson *et al.* 1985; Hally and Rudolph 1986; and others). Case studies presented in Williams and Shapiro (1990) examine sociopolitical structure and evolution across the Southeast. The above studies portray Late Mississippian societies as being of hierarchical structure within territorially defined polities. Central to each polity were ceremonial centers containing one or several mounds. Villages, hamlets and individual farmsteads made up the balance of the population and distribution network.

There is a void in the understanding of Lamar culture in the upper Piedmont and Foothills portions of the Chattahoochee River Valley. Along the Etowah River, King (1997) has recently divided the Lamar into the Stamp Creek (625 to 575 BP), Mayes (575 to 525 BP) and Brewster (525 to 450 BP) Phases. In the upper Savannah River Valley, Lamar is split into Rembert (700 to 550 BP), Tugalo (550 to 400 BP) and the very late Estatoe (350 to 250 BP).

In general, Lamar ceramics include plain, complicated-stamped and incised wares with applied or folded rims (Hally and Rudolph 1986). Rims are often pinched or punctated. Stamp Creek wares are plain or decorated with poorly executed complicated-stamped designs. Apparently, poorly executed incised wares appear during the Mayes Phase (King 1997). Later Brewster Phase ceramics include plain, complicated-stamped and incised surface treatments. Later Lamar rim folds tend to be wider than those on earlier Lamar vessels.

In the Lake Allatoona area (Ledbetter *et al.* 1987), early Lamar sites tend to be clustered around expansive alluvial settings and confluences. Later Lamar sites are more dispersed along the main river valleys and their tributaries. Both early and late Lamar sites are most frequently found on terraces and related alluvial features. Wynn (1990) notes a significant cluster of Lamar sites in the Sautee-Nacoochee Valley area on the upper Chattahoochee. As many as twenty sites on the floor of the Nacoochee Valley and contributing tributaries have Lamar components.

3.3.5 Protohistoric and Native American Period

The Protohistoric period was characterized during the middle 1500s by the explorations of DeSoto and Pardo, but neither was in the immediate vicinity of the project area. These incursions were followed by a slow migration of European settlers into the Southeast. This influx resulted in the rapid decline of aboriginal societies via war, disease, and assimilative processes. By 1755, the Cherokee began moving into North Georgia (including the Etowah and Chattahoochee River Valleys), apparently as a result of defeating the Creek in the Battle of Taliwa (Mooney 1900). By the beginning of the 19th century, Creeks living along the Chattahoochee and Flint Rivers had been forced south of the Fall Line, with the possible exceptions of Creek settlements at Standing Peachtree and Sandtown (Smith 1992).

As early as 1806, the U.S. government began widening existing Cherokee trails in north Georgia to facilitate European access and settlement. With the help of the improved transportation network, Gwinnett County was sectioned and surveyed by 1819. This was done in anticipation of the land lottery that would allow for the disbursement of Indian lands into the hands of white prospectors and settlers. Once the vehicles for settlement were in place, the U.S. government ordered the removal of the Cherokee from Forsyth and Cobb Counties between 1832 and 1835. While many Cherokee were removed from the area, some remained behind until settlers arrived (Jeane 1984). In a few instances, wealthy Cherokee landowners were able to buy back their land and remain in Georgia (Gresham 1987).

During the 1820s and early 1830s northwest Georgia became the center for Cherokee culture. Wilms' (1973) Cherokee Indian population and improvements distribution maps (1830s) show that the Cherokee occupied the Forsyth/Cobb County (north) side of the Chattahoochee River Valley in small to moderate numbers. Because they were positioned along what was then the boundary of the state of Georgia, some Cherokee living in this area became wealthy and influential through commerce with settlers and businesses on the other side of the river (Wilms 1973). This wealth could be measured in land and slave ownership. While the average farm in the Cherokee Nation covered 11 acres, those along the Chattahoochee River averaged 142 acres. Of the 231 slaves in Forsyth County in 1835, 168 were owned by Cherokees living in the Chattahoochee River Valley (Wilms 1973). Cherokee farms along the river in Cobb County were smaller than those in Forsyth (Shadburn 1989).

Several ferries across the Chattahoochee River opened original Cherokee County to traders, and finally to settlers, in the late 1820s-early 1830s. These ferries were highly profitable businesses because they were located at the boundary of the Cherokee Nation and the state of Georgia, and many were owned or half-owned and operated by Cherokees. Ferries from Hall, Gwinnett, and Dekalb Counties crossed the river into original Forsyth and Cobb Counties, linking secondary roads to the Federal Road, which was the primary land route through Cherokee territory. Ferries crossing the Chattahoochee River in original Cobb County (1st District) were Gates Ferry (near Wolf Creek, southeast of Roswell), and Copelan's Ferry (Land Lot 623) (Shadburn 1989). In the 17th District, Harris' Ferry (Land Lot 1021), Powers Ferry (Land Lot 1067), and Montgomery's Ferry (Land Lot 1023), and two shallow ford crossings, located at Island Ford (Land Lot 572), and Lower Shallowford (Land Lot 379) crossed the Chattahoochee into Cobb County (Shadburn 1989).

The material culture of the Cherokee included a mixture of Native and Euro-American artifacts. Turning again to archeological data from the Allatoona Lake area, Historic Cherokee sites (AD 1800 to 1838) are generally recognized by the presence of Galt ceramics (Caldwell 1955). It should be noted that Caldwell (1955) recovered a sample of Historic Cherokee ceramics from the Boyd Site in Forsyth County. He referred to some as "Boyd check-stamped" (but also recovered a complicated-stamped vessel) and compared Boyd wares to Galt. Ledbetter *et al.* (1987) redefined Galt ceramic traits to include poorly executed complicated- or check-stamped wares with heavy grit-tempering and a blue-white or red surface color. Rims are applied or folded, and pinched or notched. These wares are sometimes accompanied by European earthenwares (creamware, pearlware, whiteware), dark green bottle glass, rifle parts/flints, wrought nails, and metal tools/cookware.

The Historic Cherokee lived in towns and farmsteads along the Etowah/Chattahoochee River Valleys for 30 years at most (Ledbetter *et al.* 1987). A Cherokee "town" would be more aptly called a loosely knit, rural community. Wilms (1973) describes the Historic Cherokee town as an agrarian, loose, linear group of farmsteads with a preference for the broader valley floors. The larger creek watersheds were also homesteaded.

3.3.6 Historic Period

Land in the present project areas was part of the original Cherokee County until the 1832 Cherokee Land Lottery, when it became part of Cobb County. Cherokee County was divided into 40-acre gold prospecting lots and 160-acre farming lots, which were dispersed in the Land Lottery of 1832. In 1857, Milton County was formed from portions of Cobb, Forsyth, and Cherokee Counties, and in 1932 Milton County was merged with Fulton County. The boundaries of original Cobb County included Roswell until Roswell (along with the rest of Milton County) was incorporated into Fulton County in the middle 20th century (State of Georgia 1962).

Early settlement and economy in the project region followed established frontier patterns. Initial settlement was primarily along river and stream valleys where rich alluvial soils were available. The first settlers in the area were subsistence farmers that constructed small one or two room log cabins. Farms in the study area were generally larger than earlier headright claims to the east, but were still initially small and scattered, owing to contemporary agricultural technology. Pioneer farming focused on clearing trees on the best soils to establish a garden, some fruit trees, a cash crop, and a food crop. Corn was the principal food crop, and corn and tobacco were the first cash crops. Sweet potatoes, Irish potatoes, and beans were also grown. Pigs, sheep, and cattle were allowed to roam the open range and woodlands. Until construction of railroads in the area, cattle was driven overland to Augusta for river transport to markets in Savannah (McIntosh 1940).

Roswell King, Sr., a resident of the Georgia Coast, visited Cobb County during a business trip to Dahlonega in the early 1830s. Near the confluence of Vickery Creek and the Chattahoochee River, he saw that the steep grade of the creek would provide sufficient water power for a large mill. The first cotton mill constructed by King was operating by the late 1830s, and by 1840 there were 28 workers. King, who was originally from Connecticut, modeled his factory after New England textile mills (Wood 1993). This style of architecture was repeated throughout the mill village, which later became Roswell. By 1852, a cotton factory, a wool factory, a grist mill, a shoe shop, two blacksmith shops, and a retail store were operating under the auspices of the Roswell Manufacturing Company (Wood 1993). Within the next two years the town of Roswell was incorporated (WPA n.d.), the manufacturing company had added a second cotton mill, and expanded the capacity of the first mill.

The low numbers of slaves in the upper Piedmont, relative to the large plantations to the south, created a difference in opinions and attitudes between the Piedmont and the Coastal Plain counties, particularly in matters regarding secession and civil war. The Georgia State Convention of January, 1861 recorded 50,243 votes for state secession from the Union and 37,123 votes against (Coleman 1977). The most militant secessionists came from the large plantation areas of the state, while the northern Piedmont and pine barrens argued against leaving the Union.

In spite of the reluctance of many North Georgians to support the Civil War, manufacturing of war-related products ensued as quickly as factories could gather the necessary raw materials and skilled workers. Atlanta was one of the state's major defense manufacturing areas, producing ammunition, artillery, pikes, powder, small arms, and swords. Atlanta was chosen as the location for one of the Confederacy's several arsenals. The city also manufactured rails for train tracks and armor plating (Coleman 1977). The first two years of the war acted as an impetus for industry in Georgia. Eventually, however, the shortage of materials, machinery, capital, and knowledgeable workers on the home front slowed the factories down drastically. The textile mills in Roswell supplied the Confederate army with canvas for tents, cotton sheeting for hospital linens, and thread and wool for uniforms (Coleman 1982).

While no major Civil War battle activity occurred in the project areas, some of the most significant troop movements of the Atlanta Campaign passed nearby (Davis *et al.* 1983; Scaife 1993). Rebuffed by Confederates entrenched in the heavily fortified Chattahoochee River Line in south Cobb County, a large contingent of the Union army was diverted to Roswell. In early July 1864, The Army of the Tennessee, under the command of Major General James B. McPherson, received orders to march from Marietta to Roswell, where they would cross the river and approach Atlanta relatively unopposed (Scaife 1993). As the Union forces approached Roswell, Confederate troops burned the covered bridge over the Chattahoochee River, and set up sharpshooter lines on the Roswell side. On July 6, 1864, advance Union cavalry under the command of General Kenner Girard burned all the textile mills in Roswell (Brown 1980). The several hundred textile workers (primarily women) were sent North so they could no longer contribute to the Confederate effort (Wood 1993). General McPherson's army crossed the river near Soap Creek on July 8 and Vickery Creek on July 9 (Scaife 1993). Union forces occupied the Roswell area for several weeks. The resulting Union siege and occupation of Atlanta eliminated much of the Confederacy's manufacturing capabilities.

The most devastating results of the war in Georgia, in terms other than lives lost, were the conditions farmers faced following the conflict. Resources and raw materials were either lost or severely limited, the pre-war labor system was totally destroyed, and capital was virtually non-existent. The lack of capital and labor available to planters dictated the development of a new agricultural system, tenant farming.

Georgia counties outside the main route of General Sherman's army were more fortunate than Cobb and Fulton. These counties had few slaves and few large plantations prior to the Civil War, making post-war adjustment less radical. The counties surrounding Atlanta became more industrialized following the Civil War, which created more manufacturing jobs, but also more regional rivalries with other less financially fortunate sections of the state (Garrison 1981). The progressive efforts of the upper Piedmont counties produced positive results, visible in the formation of new towns.

By the 1880s farmers were beginning to reap the profits of improved technology. This changing technology took the form of better transportation to wider markets, including the construction of more railroads and highways. Improved railroad transportation was a definite asset to farmers in transporting their crops to major and secondary markets. Roads continued to play a major role in the transportation of crops to market, and were used with and without connections to railroads. As late as 1900, farmers commonly reported hauling crops by wagon as far as 60 miles to market corn and 110 miles for cotton, although a haul distance of 40 miles for cotton was more typical (Fogel 1964).

Between 1910 and 1920 the amount of arable acres in Georgia was expanded considerably. The year 1913 was one of the last, most productive periods of cotton production prior to the boll weevil scourge (Stancil 1984). The boll weevil outbreak from 1920 to 1923, combined with the glut on the market from the

over-production of cotton, brought prices for the state's major crop to an all-time low. In 1932 cotton prices fell to only five cents a pound (Stancil 1984). The collapse of the cotton market and the Great Depression forced many farmers to leave the countryside and seek better economic opportunities in towns and cities. By 1930 the total population of Georgia climbed to 2,908,606, although the percentage of urban inhabitants almost doubled to 30.8 percent (Flanigan 1959).

The shift from rural to urban settlement marked the change from self-sufficient agriculture to commercial agriculture, enabling the production of large amounts of food for a large more concentrated population. The mechanization of farm equipment and the development of such machines as the hay chopper, the combine, the mechanical corn picker, and irrigation equipment were major assets to farmers who had remained on their farms. The establishment of better farming methods including crop rotation, improved tillage and fertilizers, soil conservation, and the studying of agriculture as a science (agronomy) combined to promote agriculture on a commercial level (Snodgrass and Wallace 1964). Generally, Georgia farmers were quick to adopt agricultural improvements, beginning contour plowing and terracing as early as 1840. The establishment of improved agricultural techniques and commercial farming did not, however, eliminate small tract farmers.

Tenant farmers continued to earn livelihoods throughout Georgia, albeit in smaller numbers. They raised hogs, cattle, and goats for domestic purposes in addition to cultivating crops. It was not until the 1950s that livestock raising approached commercial levels in Georgia with the establishment of large chicken farms throughout the state (Stancil 1984).

The loss of profits from cotton, and the Great Depression forced many farmers to leave the countryside and seek better economic opportunities in towns and cities. Suburbanization followed major roads and rail lines which established easy transportation for commuters to Atlanta in the early 20th century (Roth 1988). The boom in construction of highways after World War II fueled growth of the Atlanta suburbs. Since the 1950's the development of the communities around the Chattahoochee River has been among the most rapid in the United States. Due to the suburbanization of the areas north of Atlanta, the region's economic base is no longer agricultural.

Due in part because of rapid growth in the Atlanta region, Congress created the Chattahoochee National Recreation Area in 1978 (O'Grady and Poe 1980). This property extends 48 miles along the river, from Buford Dam to Peachtree Creek (O'Grady and Poe 1980). Within this area, the NPS has developed 14 separate recreation areas with public facilities and access to the river, while large segments of the river corridor remain in their natural state (O'Grady and Poe 1980). In the last 20 years, commercial and residential development near these areas have caused a significant decrease in rural and industrial property. Today, the economy of the region is founded on commerce and business, including the growing enterprise of tourism.

4.0 RESEARCH DESIGN AND EVALUATION CRITERIA

4.1 Project Goal

The primary project goal was to comply with Section 106 of the NHPA. In order to accomplish this goal, cultural resources within the project's area of effect were identified and assessed following Georgia HPD guidelines and principles in the appropriate federal recommendations. This assessment includes recommendations on NRHP eligibility status following criteria set forth in 36 CFR Part 60.4 (a-d) and regulations under 36 CFR Part 800 relating to project effects on cultural resources.

4.2 Research Issues

The research issues discussed in this section are posited based on information gathered from a variety of sources, in particular the *Georgia Archeological Research Design Papers* (Anderson *et al.* 1990; Wood and Bowen 1995; Hally and Rudolph 1986; Smith 1992), *A Vision for the Future, The Georgia Historic Preservation Plan* (Georgia Department of Natural Resources 1989) and *New Vision, The Preservation Plan for Georgia's Heritage* (Georgia Department of Natural Resources 1995). Other important sources include data from studies in the project vicinity (Braley *et al.* 1992; Hamilton 1974; Gantt 1997, 2003; Gantt and DeRosa 2000; Jordan 2003; Ledbetter 1991; O'Grady and Poe 1980; Rogers 1991; Wauchope 1966; Wood 1989, 1993) and archeological work conducted in the Georgia Piedmont and relevant to the Southern Piedmont (Anderson and Sassaman 1996; Anderson and Joseph 1988; Caldwell 1953, 1957; Claggett and Cable 1982; Coe 1964; Ledbetter *et al.* 1987; Sassaman 1991; Sassaman *et al.* 1990; Wauchope 1966; Wynn *et al.* 1994).

4.2.1 Temporal/Cultural Affiliations and Cultural Chronology

Prior to discussing prehistoric and historic settlement, subsistence and land use models, expectations of the local cultural traditions and their temporal parameters were formulated. The expectations are based on the previous investigations and the regional cultural context discussed in Section 3.0.

4.2.2 Human Settlement and Use

Native American Populations: Expectations applicable to the prehistoric settlement and use of the Georgia Piedmont have been advanced for the: Paleoindian (Anderson 1990; Anderson *et al.* 1990; Goodyear *et al.* 1989; Goodyear 1982, 1979; O'Steen *et al.* 1989); Archaic (Sassaman 1991; Blanton and Sassaman 1989; Anderson and Hanson 1988; Canouts and Goodyear 1985; O'Steen 1983; Claggett and Cable 1982); Woodland (Bowen 1989; Wood and Bowen 1995); and Mississippian (Anderson 1990; Hally and Rudolph 1986; Hally and Langford 1988; and many others) periods. Piedmont settlement and land use by

Protohistoric and Historic Native groups have been discussed by Hudson *et al.* (1985), Smith (1987, 1992), Williams and Shapiro (1990), Wilms (1973) and others.

Expectations for prehistoric settlement and use of the study areas rely significantly on the studies enumerated in Section 4.2. Our expectations take into consideration that the current study areas consist solely of floodplain environments:

Paleoindian Period: A very low frequency of Paleoindian temporary camps or locations is expected. This expectation is based on the low overall density of Paleoindian populations in the Piedmont and the lack of critical lithic resources in the study area. Williams (2000) provides statistics on the geographic distribution of recorded archeological sites within Georgia by their identified temporal components. As of December 2000, Paleoindian sites comprised 1.2 percent of the total sites in the Gainesville Ridges Physiographic District. Statewide, the percentage of Paleoindian sites is 1.1 percent of the total sites recorded. Assuming that Dalton groups were exploiting broader areas of the Piedmont than their predecessors, Dalton sites are expected to be more frequent than those representing earlier groups.

Archaic Period: A trend of increasing site density from the Early Archaic to the Middle Archaic is expected. Williams (2000) reported that 6.0 percent of the sites recorded in the Gainesville Ridges district contain an Early Archaic component. Statewide, Early Archaic sites comprise 9.3 percent of the sites recorded. Williams (2000) indicates a surge in Middle Archaic sites in the project region. In the Gainesville Ridges district, 29.3 percent of the sites contain a Middle Archaic component, which is far greater than the statewide average of 14.6 percent. Site files data indicate the frequency of sites decreased from the Middle Archaic to the Late Archaic in the Gainesville Ridges, with fewer Late Archaic sites in this district than the statewide average. Late Archaic sites in the district represent 11.3 percent of the total (Williams 2000). Statewide, 17.7 percent of sites are Late Archaic.

During the Early and Middle Archaic, the uplands surrounding the project area are expected to have been used most intensively for resource extractive activities resulting in a high frequency of small (low density) lithic reduction locations and temporary camps, and a low frequency of long-term residences. Late Archaic habitation sites are most likely to be near or within the alluvial settings (the project areas). For this reason, Late Archaic sites may be deeply buried and their density being underestimated. Previous studies suggest that the use of locally available lithic material (quartz) increased over time as access to exotic materials became limited. Based on review of the physiography and geology of the project area, a low frequency of quartz quarry sites and lithic workshops are expected.

Woodland and Mississippian Periods: Site files data (Williams 2000) indicates a further reduction of sites in the Gainesville Ridges district during the Early Mississippian. However, Early Mississippian sites represent 8.5 percent of total sites recorded in the district, which is far greater than the statewide average of 3.3 percent. The Gainesville Ridges contains even fewer Middle Mississippian sites, which comprise only 2.1 percent of total sites recorded. The average for Middle Mississippian sites in other districts in Georgia, 3.8 percent, is greater than in the Gainesville Ridges (Williams 2000). From the Middle to the Late Mississippian, the Gainesville Ridges district saw an increase in the number of sites to 5.4 percent. However, this is far less than the state average of 16.0 percent (Williams 2000).

It is expected that use of the project area generally shifted over the course of the Woodland and Mississippian periods. Hunting and gathering were still important, but gardening and agriculture were

increasingly more productive and demanded more attention. As a consequence of gardening and agriculture, Woodland and Mississippian sites are expected to occur within arable alluvial settings (i.e., along the Chattahoochee River) or on upland landforms near alluvial settings. Use of the higher uplands is expected to be more widespread but less intensive than during earlier times. Seasonal base camps and permanent habitation sites are most likely to occur in the floodplain. Woodstock phase sites are expected to be found in significantly higher frequencies than occupations from the earlier and later periods. Previous work in the study vicinity indicates this section of the Chattahoochee River Valley was not densely populated during the Late Mississippian period.

Protohistoric and Historic Native Periods: According to Site Files data, 1.6 percent of sites recorded in the Gainesville Ridges contain a Historic Indian component. This is far less than the statewide average of 5.5 percent. Being closely linked to expansive alluvial settings for agricultural purposes, Historic Native (i.e., Cherokee and possible Creek) components could be found in the study area with minor occupations of the upland areas. Although archival records indicate that the Cherokee inhabited the project vicinity, previous archeological studies show that these sites are often difficult to locate due to the short period of occupation (approximately 30-50 years), and disturbance often caused by reoccupation of the sites by settlers immediately after removal.

Historic Populations: Historic settlement expectations for the study area are based on broader models posited for the southern Piedmont (Billington 1960; Hudson 1969). Historic rural settlement is viewed as a series of populational waves. In general, the initial wave was composed of traders, prospectors/miners and similar speculators. Next, pioneer farmers established the frontier, followed by farmers equipped to manage larger agricultural operations. Finally, commerce and industry developed when (and if) local infilling occurred.

Factors affecting settlement included access to major waterways, incipient road/trail networking, soil fertility, topography, access to potable water and vegetation. Primary historic use of the project areas was expected to be agricultural, resulting in the construction of outbuildings, and fence lines in the uplands. Early historic fields were likely in the floodplain. Historic domestic sites and related discards, as well as later agricultural fields, were expected to abut major historic roads or farm roads in upland areas. Domicile areas were expected to occur on high, level ground, while agriculturally-related sites (i.e., barns, sheds) or special use sites (i.e. cemeteries, stills) may be located opportunistically around houses, fields, pastures or ravines, depending on their function. It was expected that historic occupation and use of the project area may have begun during the 1820s with isolated domestic sites (i.e. house sites, discards, special use areas, etc.) along level upland landforms closest to the river, roads, and ferry landings. As infilling occurred and land was subdivided further, the domestic and agricultural presence is expected to have increased to a maximum in the late 19th to early 20th century. Thereafter, agrarian resources are expected to have declined.

4.2.3 Research Questions

The following research questions are posed in relation to cultural chronology and human settlement/use of the study area:

- What are the cultural/temporal manifestations within the project area?
- What were the prehistoric settlement/use patterns within the project area and how do they compare with reported patterns for the various prehistoric groups?
- How did historic groups use the study area? Was historic use limited to agricultural and domestic activities?
- In concert with evidence of cultural/temporal affiliation, was the study area or portions of the study area used selectively during prehistoric or historic times?

5.0 FIELD METHODS

5.1 Field Survey Strategies

Subsurface tests were conducted at regular intervals, ranging from 10 to 30 m in each survey area. Due to the small size of some of the survey areas, the shovel test interval was reduced to provide adequate coverage. Areas of open water and saturated wetlands were avoided. The rationale behind this strategy was to:

- Provide systematic coverage of the project area at a level adequate for detecting cultural resources
- Control personal survey biases that might arise among survey team members
- Collect the information required to address the research issues discussed in Section 4.2.

5.2 Archeological Field Survey Techniques, Implementation and Rationale

Subsurface Testing: Screened shovel testing was the only subsurface technique used during the survey. This involved the excavation of 30 by 30 cm units at the intervals discussed in Section 5.1. Shovel test soils were screened through 0.64 cm hardware cloth, the retained material examined and artifacts collected. Each profile was cleaned, examined and the soil texture, color and depth of deposits noted. Where possible, screened shovel tests were excavated to sterile subsoil. In areas where subsoil extended deeper than 1 m shovel testing was terminated at approximately 1 m.

Surface Inspections: As available within the project area, exposed surfaces (e.g., unpaved road surfaces and cuts, trails, tree falls, fire breaks, heave zones around tree trunks, and various eroding surfaces) were visually inspected.

Landscape Scanning: Visual scanning of the landscapes was important in determining the potential presence of archeological sites with surface indications. The survey team perused the landscape for rock tables and outcrops that may have been used by prehistoric groups as rock shelters and lithic quarries. The survey team also looked for vegetation patterns, surface artifacts, pits and/or stone arrangements indicative of house sites, dumps, liquor stills, cemeteries, rock piles, and similar sites with surface indications.

6.0 SURVEY RESULTS

6.1 Previously Recognized Cultural Resources

Archeological Sites: A review of the Georgia Archeological Site Files found that six previously recorded sites are located within or directly adjacent to the project areas (Table 6.1; Figure 6.1).

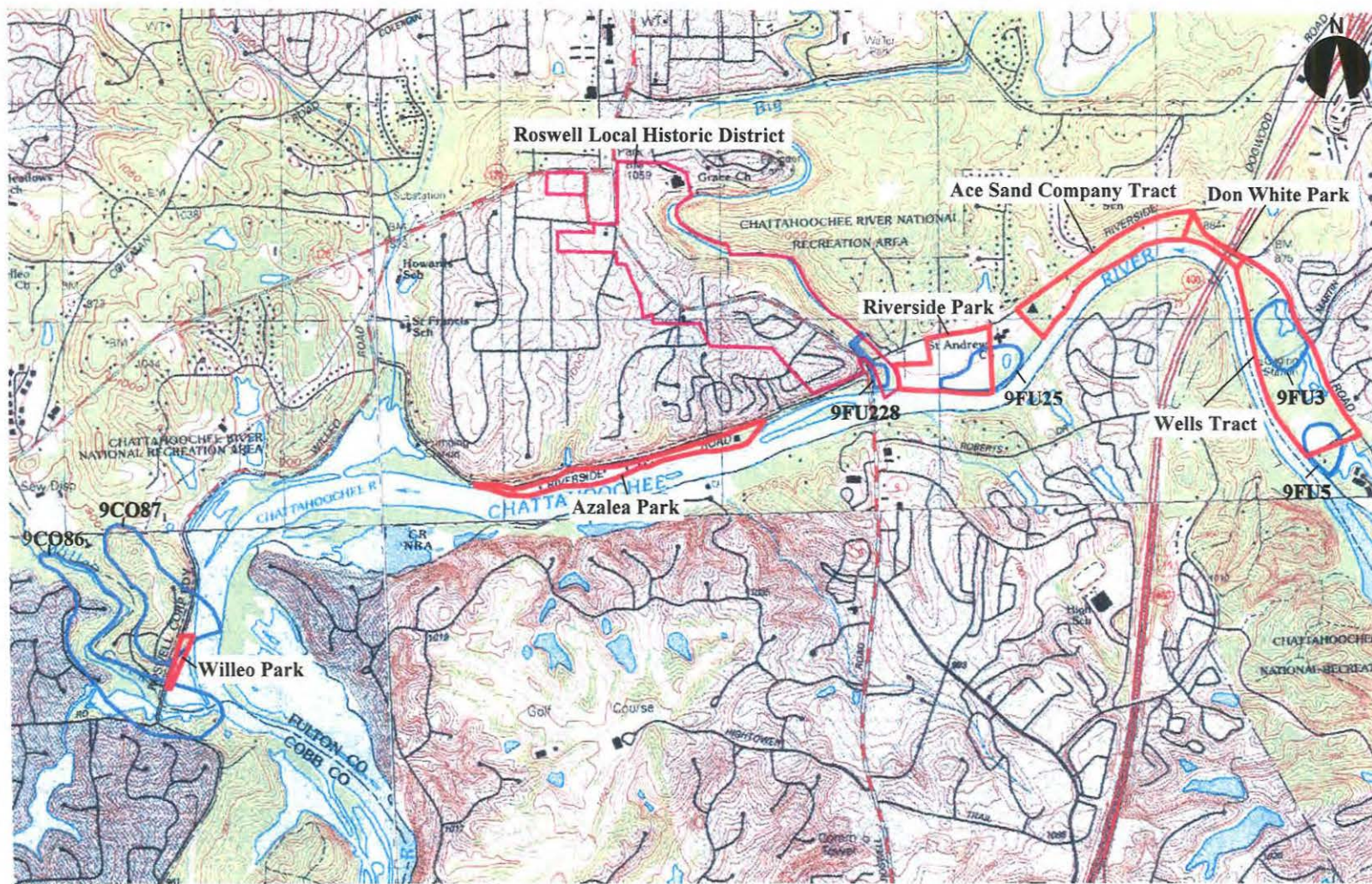
Table 6.1 Archeological Sites in or Adjacent to the Project Areas

Site No.	Project Area	Site Type	Cultural Affiliation	NRHP Recommendation	Reference
9CO86	Willeo Park	Village	Unknown	Unknown	GASF 1951
9CO87	Willeo Park	Fish weir	Unknown	Unknown	GASF 1970
9FU3	Wells Tract	Village	Early Woodland to Protohistoric	Unknown	Wauchope (1966)
9FU5	Wells Tract	Village	Early Woodland/ Early Mississippian	Unknown	Wauchope (1966)
9FU25	Riverside Park	Village	Late Archaic- Mississippian	Ineligible	GASF (1978)
9FU228	Riverside Park	Textile Mill	Middle 19 th century	Eligible	O'Grady and Poe (1980); Rogers (1991); Braley <i>et al.</i> (1992)

National Register of Historic Places Listed/Eligible Properties and Fulton County Historic Structure Surveys: Review of the files at HPD revealed that no NRHP listed/eligible structures are located within or adjacent to any of the project areas. Site 9FU228 (Ivy Mill) has been determined NRHP eligible (Figure 6.1). The locally designated Roswell Historic District is adjacent to the Riverside Park project area (The Yaeger Company 2001) (Figure 6.1). The Chattahoochee River Crossing, located at Azalea and Riverside Drives, is within the Roswell Historic District and designated individually as a historic resource (Kidd and Associates, Inc. 1973). The river crossing is adjacent to the Riverside Park project area.

Civil War Activity: Civil War activities are discussed in Section 3.3.6. No trenches or other earthworks have been recorded in the immediate vicinity of the project areas.

1832 Cherokee Land Lottery: Land lottery plats for original Cherokee County were examined for structures, improvements, or other features within or adjacent to the project area. We were unable to locate some of the plats for the project areas during the literature search. A trail that crossed Land Lot 379 may have been partially within the Azalea Park project area. A road shown running north-south in Land Lot 494 is in the same location as River Landing Drive, bisecting the Ace Sand Company Tract project area. A road running north-south is bisecting a field in Land Lot 534. A portion of the road and one of the fields is within the Wells Tract.



Map Source: 7.5 Minute USGS Quadrangles
 Chamblee (1993), Mountain Park (1992),
 Sandy Springs (1997), and Roswell (1992), Georgia

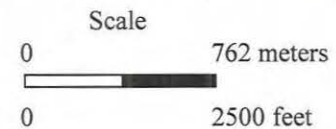


Figure 6.1 Previously Recorded Cultural Resources

6.2 Archeological Field Survey

Shovel testing and surface examination were conducted in the six Chattahoochee River parks project areas, Willeo Park, Azalea Park, Riverside Park, the Ace Sand Company tract, Don White Park, and the Wells tract. The results of the surveys in these areas are presented below.

Willeo Park: The proposed improvements in this area will be constructed within the existing City of Roswell Willeo Park. Willeo Park is located on the west side of the Chattahoochee River, between Willeo Road and the river (Figure 1.1). Areas surveyed in Willeo Park are the locations of the proposed canoe/kayak put in, sea wall, and concrete plaza (Figure 1.2). The location of the proposed sea wall is a narrow strip of land on the river bank between the river and an existing paved parking lot (Figure 6.2). This area appears to have been disturbed by previous park improvements. The proposed concrete plaza is located in an area where two existing paved paths intersect (Figure 6.2). A sewer line is located in the area of the proposed canoe/kayak put in. No archeological resources were identified as a result of shovel testing and surface examination in the areas of the proposed improvements in Willeo Park. No evidence of previously recorded Sites 9CO86 and 9CO87 was identified within the areas surveyed at Willeo Park.

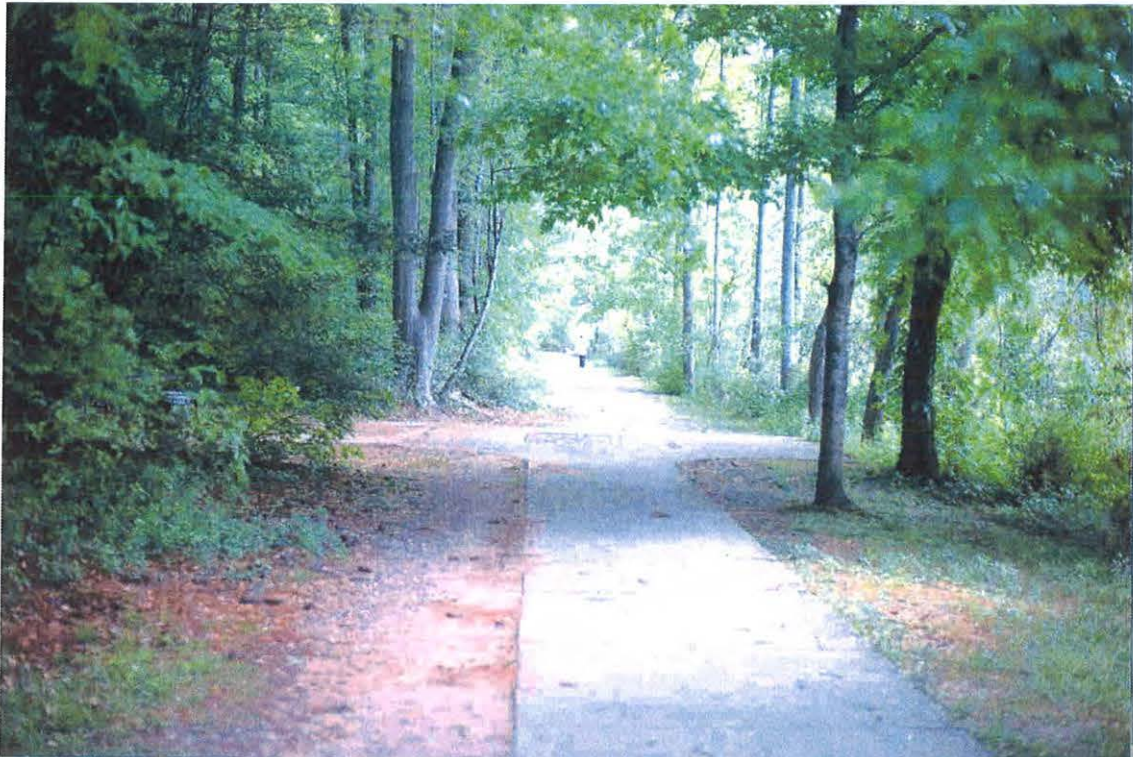
Azalea Park: The proposed improvements in this area will be constructed within the existing City of Roswell Azalea Park. Azalea Park is located on the north side of the Chattahoochee River, between Riverside Road and the river (Figure 1.1). Areas surveyed in Azalea Park are the locations of a proposed sea wall and replacement of the existing boat dock (Figure 1.3). The location of the proposed sea wall is a narrow strip of land on the river bank (Figure 6.3). The proposed replacement boat dock is located in an area that is disturbed from construction and use of the existing dock (Figure 6.3). No archeological resources were identified as a result of shovel testing and surface examination in the areas of the proposed improvements in Azalea Park.

Riverside Park: The proposed improvements in this area will be constructed within the existing City of Roswell Riverside Park. Riverside Park is located on the north side of the Chattahoochee River, between Riverside Road and the river, east of the State Route (S.R.) 9 bridge (Figure 1.1). Areas surveyed in Riverside Park are the locations of two proposed observation decks and the two associated boardwalks (Figure 1.4). The areas of the proposed boardwalks and observation decks are a wetland and the river bank adjacent to the Chattahoochee River (Figure 6.4). No archeological resources were identified as a result of shovel testing and surface examination in the areas of the proposed improvements in Riverside Park. No evidence of previously recorded site 9FU25 was identified within the areas surveyed at Riverside Park. Site 9FU228 is outside (west of) the area surveyed in Riverside Park.

Ace Sand Company Tract: A new park is proposed for construction within the Ace Sand Company tract. The Ace Sand Company tract is located on the north side of the Chattahoochee River, between Riverside Road

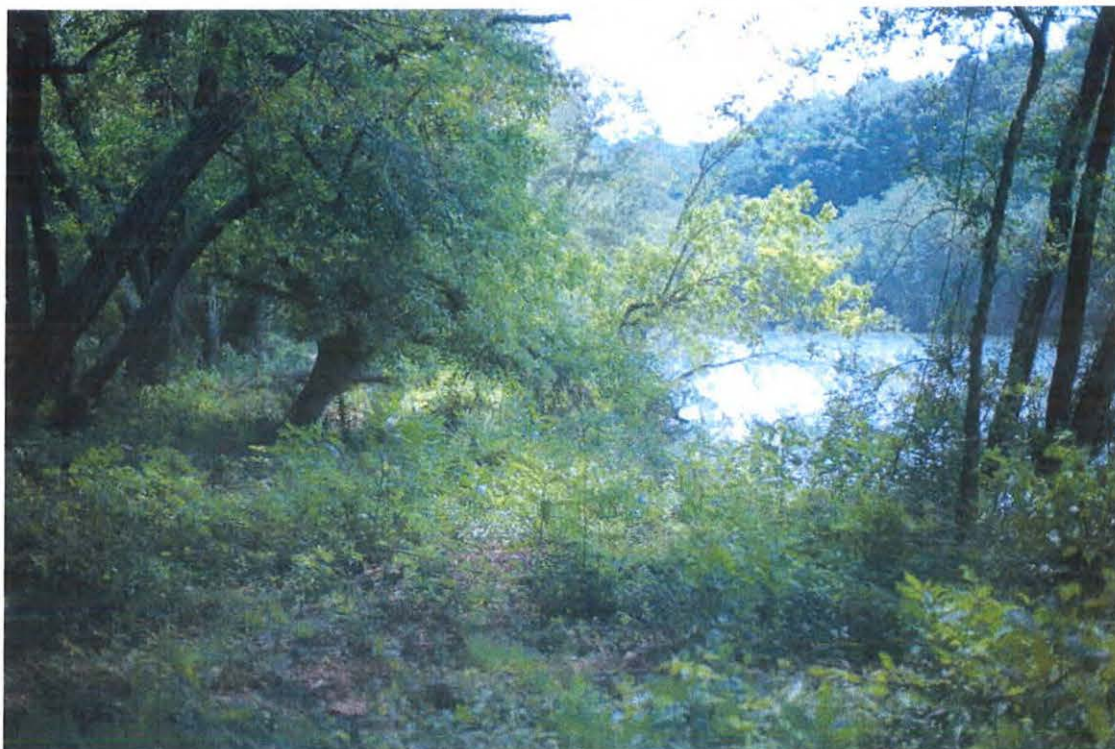


Site of the Proposed Sea Wall and Kayak Put In (Center Background), Looking Northeast



Site of the Proposed Concrete Plaza, Looking Northeast

Figure 6.2 Selected Views of the Surveyed Areas in the Willeo Park Project Tract



Site of the Proposed Sea Wall, Looking East

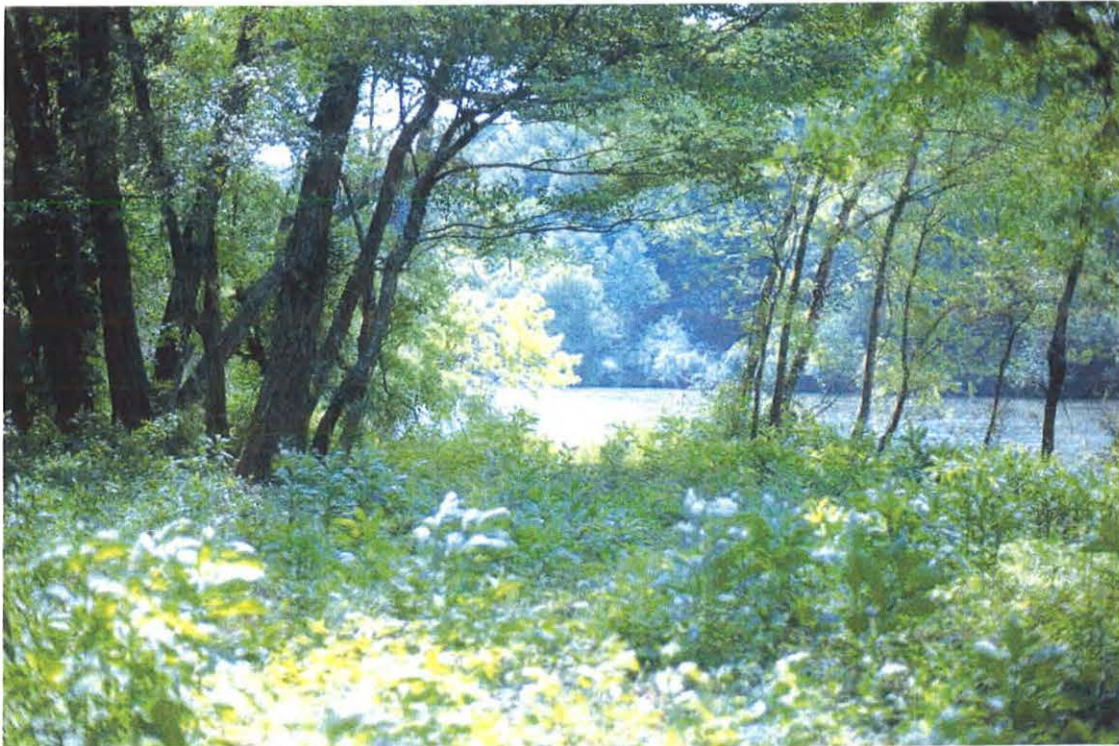


Site of the Existing Boat Dock, Looking Northeast

Figure 6.3 Selected Views of the Surveyed Areas in the Azalea Park Project Tract



Site of the Proposed Observation Decks, Looking East



Site of the Proposed Observation Decks, Looking Southeast

Figure 6.4 Selected Views of the Surveyed Areas in the Riverside Park Project Tract

and the river, west of S.R. 400 (Figure 1.1). The areas surveyed in the Ace Sand Company tract are the locations of a proposed riverboat dock on the west side of the tract and a proposed canoe/kayak put in/take out on the east side of the property (Figure 1.5). The area of the proposed riverboat dock is a graded, level area on the river bank, south of the existing park (Figure 6.5). The proposed canoe/kayak put in/take out is located in the area of an existing dirt and gravel road near the river (Figure 6.6). No archeological resources were identified as a result of shovel testing and surface examination in the areas of the proposed improvements in Ace Sand Company project tract.

Don White Park: Don White Park is located on the north side of the Chattahoochee River, at the S.R. 400 Chattahoochee River bridge (Figure 1.1). The areas surveyed in the Don White Park tract are the locations of a proposed canoe/kayak put in and a sea wall (Figure 1.2). The areas of both proposed improvements are graded, leveled, and disturbed by construction of the S.R. 400 bridge and the existing park improvements (Figure 6.7). No archeological resources were identified as a result of shovel testing and surface examination in the areas of the proposed improvements in Don White Park.

Wells Tract: A new park is proposed for construction within the Wells tract. The Wells tract is located on the east side of the Chattahoochee River, between Riverside Road and the river, south of State Route (S.R.) 400 (Figure 1.1). The areas surveyed in the Wells tract are the locations of three proposed boardwalks and observation decks located on the east, middle and west sides of the tract (Figure 1.6, 6.8, and 6.9). These areas are currently undeveloped. No archeological resources were identified as a result of shovel testing and surface examination in the areas of the proposed improvements in the Wells Tract. No evidence of previously recorded sites 9FU3 and 9FU5 was identified within the surveyed areas of the Wells Tract.



Site of the Proposed Riverboat Dock, Looking East



Site of the Proposed Riverboat Dock, Looking Southeast

Figure 6.5 Selected Views of the Surveyed Areas in the Ace Sand Company Project Tract



Site of the Proposed Canoe Put In/Take Out, Looking East

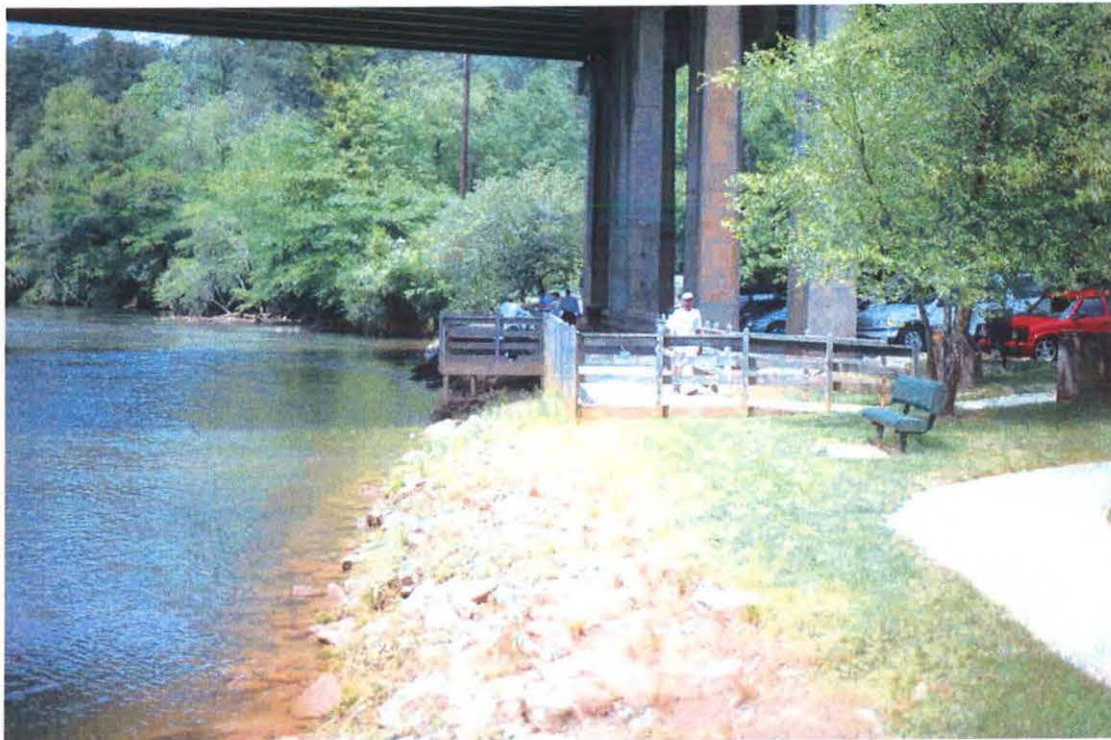


Site of the Proposed Canoe Put In/Take Out, Looking Northeast

Figure 6.6 Selected Views of the Surveyed Areas in the Ace Sand Company Project Tract

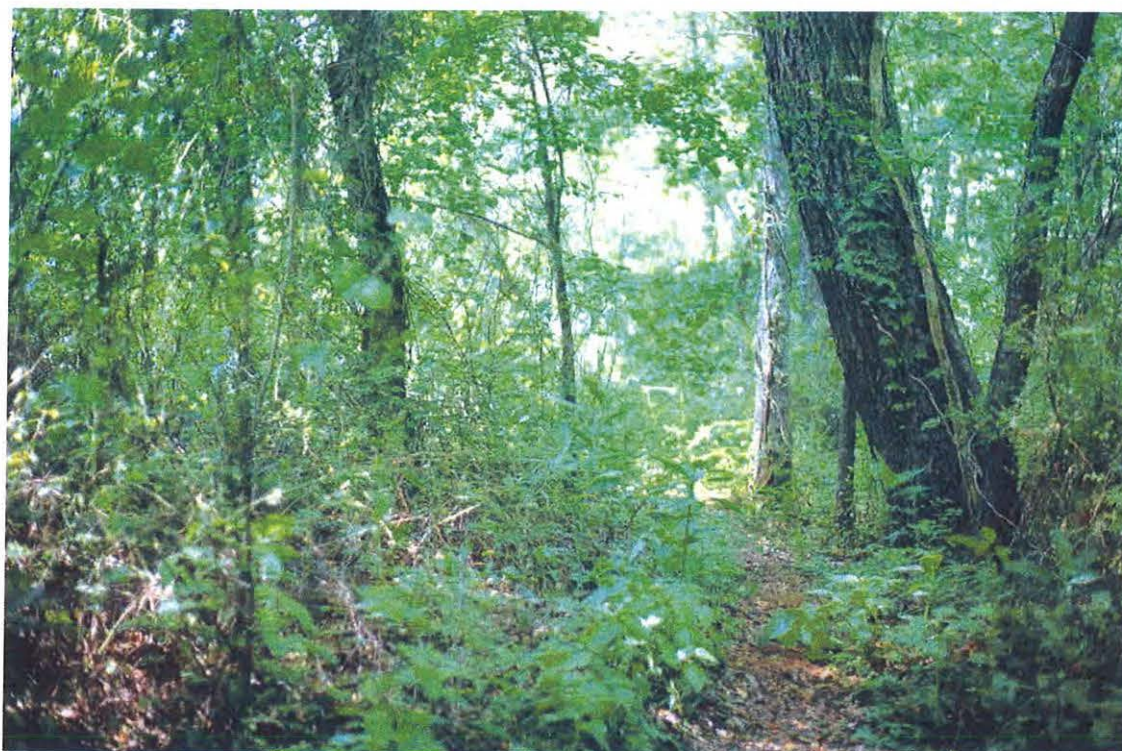


Site of the proposed Canoe/Kayak Put In, Looking Southeast

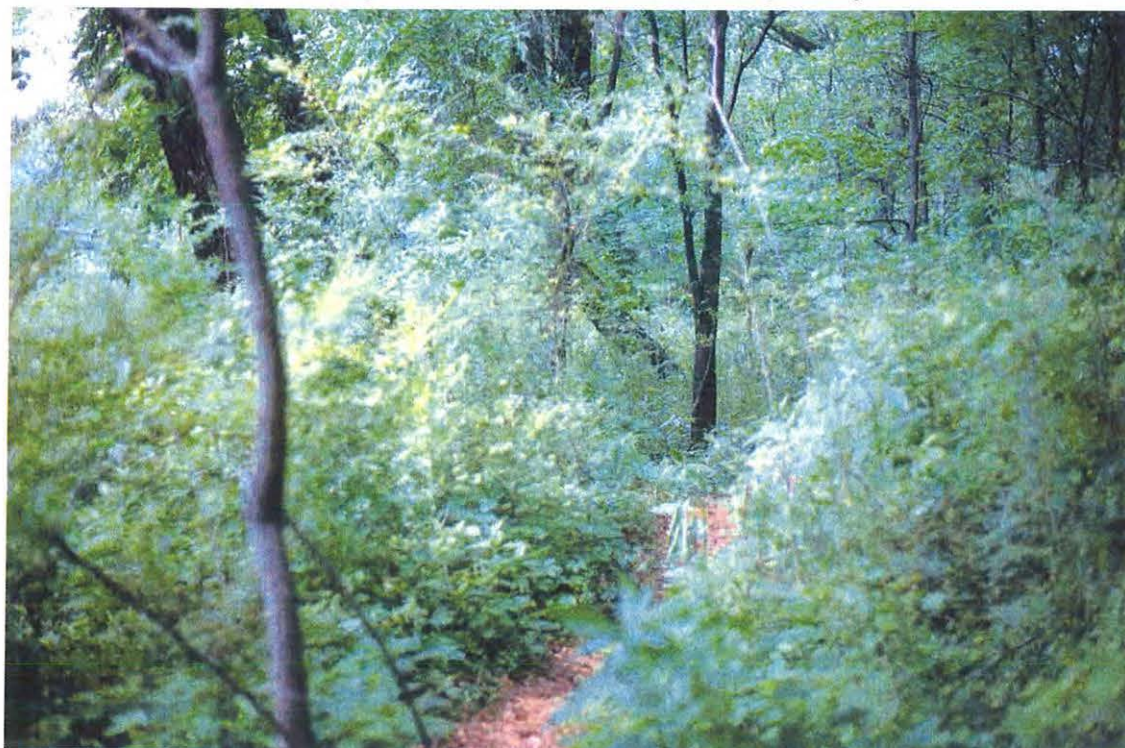


Site of the Proposed Sea Wall, Looking Northwest

Figure 6.7 Selected Views of the Surveyed Areas in the Don White Park Project Tract

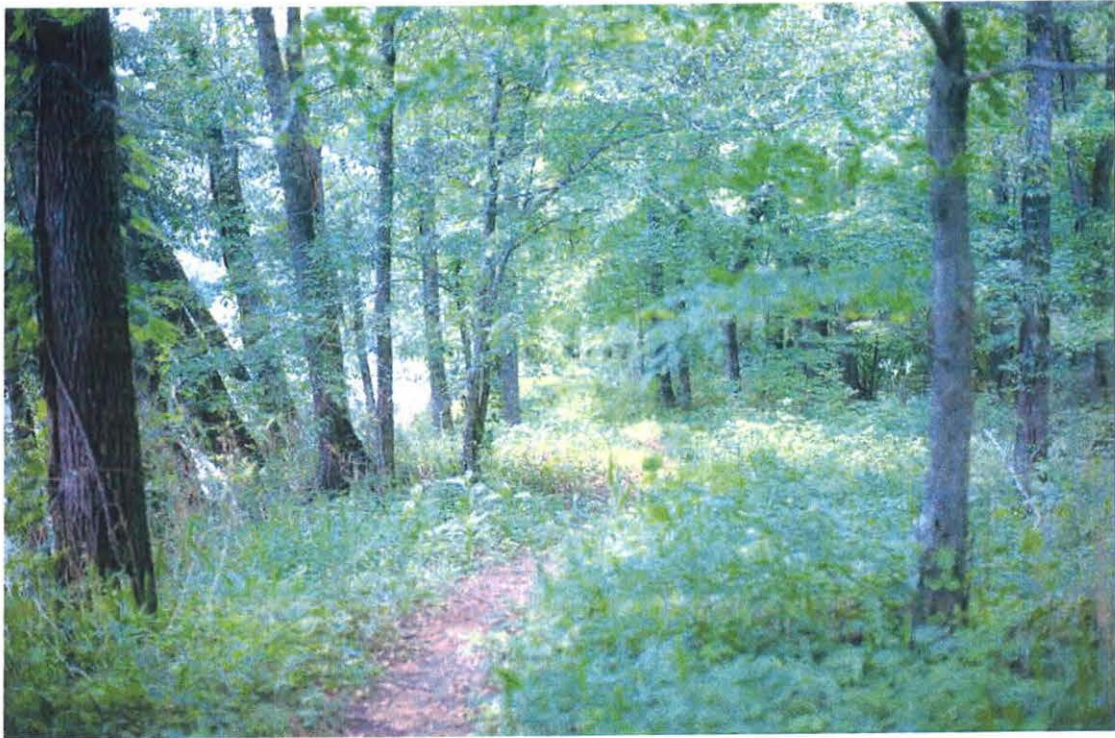


Site of the Proposed West Boardwalk/Observation Deck, Looking North

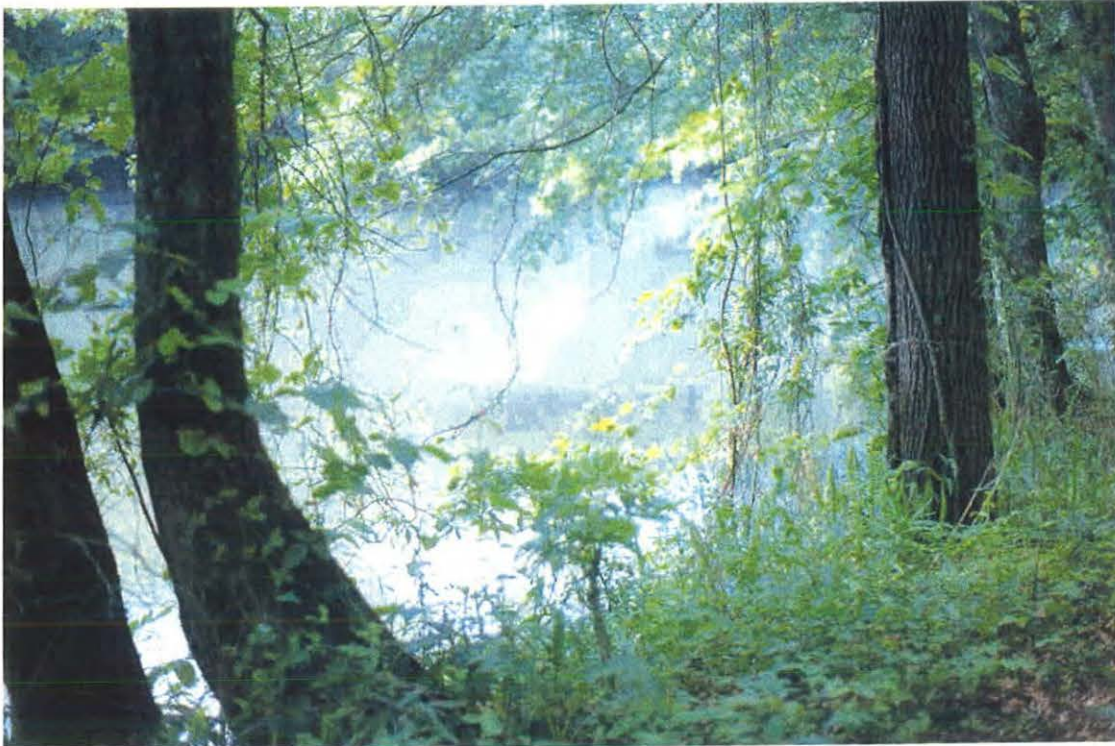


Site of the Proposed Middle Boardwalk, Looking North

Figure 6.8 Selected Views of the Surveyed Areas in the Wells Project Tract



Site of the Proposed East Dock, Looking North



Chattahoochee River from the East Dock Site, Looking Northwest

Figure 6.9 Selected Views of the Surveyed Areas in the Wells Project Tract

7.0 CONCLUSIONS AND RECOMMENDATIONS

7.1 Summary of Survey Findings

No archeological resources were found as a result of this survey in the areas examined within the City of Roswell Chattahoochee River dock sites.

7.2 Management Recommendations

Implementation of the proposed City of Roswell Chattahoochee River dock sites undertaking will result in no effect to significant or potentially significant archeological resources in the areas examined by this study. Archeological resource clearance is recommended in the areas surveyed for the City of Roswell Chattahoochee River dock sites undertaking.

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APPENDIX A - RESUME OF THE PRINCIPAL INVESTIGATOR

WILLIAM R. JORDAN

Principal Archeologist

EDUCATION: M.H.P., Georgia State University
M.A., Old Testament, Columbia Theological Seminary
B.B.A., Finance, University of Georgia

PROFESSIONAL

MEMBERSHIPS: Register of Professional Archaeologists, Georgia Council of Professional Archaeologists, Southeastern Archaeological Conference, Society for Historical Archaeology

CAREER SUMMARY

Mr. Jordan has nine years of professional experience in cultural resource management, including six years experience directing archeological survey, testing and data recovery projects. His experience includes serving as Archeologist as well as Architectural Historian and Historian on many projects. Mr. Jordan has extensive experience with report writing, National Register of Historic Places evaluation, historical research, and laboratory analysis. Prior to joining R. S. Webb and Associates in 2001 he served as an archeologist and architectural historian with Brockington and Associates, Inc. from 1992 through 2000. Mr. Jordan has also conducted extensive independent archeological and historical research on the development of alkaline-glazed stoneware manufacture in Georgia.

SELECTED ARCHITECTURAL PROJECTS

Mr. Jordan served as Architectural Historian on the following projects:

Cultural Resources Survey of the Dawson-McGrau Ford Transmission Line, Cherokee and Dawson Counties, Georgia, Georgia Power Company, Atlanta.

Cultural Resources Reconnaissance of the Proposed Highway 295 Extension Corridor, Spartanburg County, South Carolina, The LPA Group, Inc., Columbia.

Cultural Resources Survey of the Santee Cooper John S. Rainey Generating Station, Gas and Water Lines, Anderson County, South Carolina and Hart County, Georgia, General Engineering, Inc., Charleston, South Carolina.

Cultural Resources Survey of Proposed I-385 Interchange Improvements, Greenville County, South Carolina, TransSystems Corporation, Greenville, South Carolina.

Cultural Resources Survey of the Proposed Greer Eastern Bypass, Greenville and Spartanburg Counties, South Carolina, Wilbur Smith Associates, Inc., Columbia.

Cultural Resources Survey of the Proposed S.C. 296 Widening Corridor, Spartanburg County, South Carolina, Wilbur Smith Associates, Columbia.

Cultural Resources Survey of the Savannah Quarters Tract-Southwest Quadrant, Chatham County, Georgia, Hall Development Company, Myrtle Beach, South Carolina.

Architectural Documentation of the Wilkins, Stubbs, and Veazey Tobacco Warehouse, Coffee County, Georgia, The Dames & Moore Group, Inc., Bethesda, Maryland.

Determinations of Eligibility and Assessment of Effects on Two NRHP Eligible Resources in the White Bluff Road Improvement Corridor, Chatham County, Georgia, Hussey, Gay, Bell, & DeYoung Environmental, Inc., Savannah.

SELECTED ARCHEOLOGICAL PROJECTS

Development Projects

Archaeological Survey of an 11 acre development tract in Forsyth County, Georgia, Acer Environmental, Inc., Lawrenceville, Georgia.

Cultural Resources Survey of the Montgomery-May Tract, Cobb County, Georgia, Larry B. Thompson, Marietta, Georgia.

Cultural Resources Survey of the Barrett Green Subdivision (North-Unit II), Marietta (Cobb County), Georgia, Willoughby & Sewell Development Ltd., Acworth, Georgia.

Cultural Resources Survey of the Barrett Green Subdivision (South Tract), Marietta (Cobb County), Georgia, Willoughby & Sewell Development Ltd., Acworth, Georgia.

Cultural Resources Survey of the Jennings Mill Tract, Clarke County, Georgia, Fortson, Bentley, and Griffin, Athens, Georgia.

Cultural Resources Survey of the 35 Acre Old Milton Place Development Tract, Alpharetta (Fulton County), Georgia, Sembler Retail, Inc., Atlanta.

Research Design For Archaeological Survey, Evaluation, and Data Recovery at the Techwood/Clark Howell Homes Tract, City of Atlanta, Fulton County, Georgia. The Housing Authority of the City of Atlanta, Atlanta.

Archaeological and Historical Background Research, North St. Simons Island Tract, Glynn County, Georgia, Sea Island Company, St. Simons Island, Georgia.

Intensive Cultural Resources Survey of the Proposed Iotla Valley Industrial Park, Macon County, North Carolina, The County of Macon, Franklin, North Carolina.

Highways and Transportation

Archaeological Survey of the South Hall Parkway, Hall County, Georgia, Moore Bass Consulting, Inc. Stockbridge, Georgia, and Georgia Department of Transportation, Atlanta.

Archaeological Reconnaissance of the 0.8 mile Whittlesey Road improvement corridor in Muscogee County, Georgia Kisinger Campo & Associates Corp.

Phase I Archaeological Survey and Phase II Site Evaluation of the Proposed McGinnis Ferry Road Widening Corridor, Fulton and Forsyth Counties, Georgia. HDR Engineering, Inc., Atlanta.

Cultural Resources Survey of the Proposed 6.8 Mile SC Route 24 Road Widening Project, Anderson County, South Carolina, South Carolina D.O.T., Columbia.

Archaeological Survey of the Proposed Buena Vista Road Widening Project, Muscogee County, Georgia, ICF Kaiser Engineers, Atlanta.

Cultural Resources Survey of the Proposed 5th Avenue Road Widening Project, Muscogee County, Georgia, Moore, Bass, and Bibler, Atlanta.

Cultural Resources Survey of the Atlanta Road Part Three Improvement Project, Cobb County, Georgia, ARCADIS, Atlanta.

Cultural Resources Survey of the Downtown Acworth Road Improvement Project, Cobb County, Georgia, Greenhorne & O'Mara, Marietta, Georgia and the LPA Group, Inc., Norcross, Georgia.

Archaeological Survey of the Breckenridge Boulevard Extension Corridor, Gwinnett County, Georgia. Jordan Jones & Goulding, Inc., Atlanta.

Cultural Resources Survey of the Atlanta Road Part 2 Road Improvement Project, Cobb County, Georgia, Piedmont Olsen Hensley, Atlanta.

Archaeological Reconnaissance and Architectural Survey of the SC 6 Road Improvements Project, Lake Murray, Lexington County, South Carolina, The LPA Group, Inc., Columbia.

Cultural Resources Survey of the SC 802 Road Widening, Ladies Island, Beaufort County, South Carolina, Wilbur Smith Associates, Columbia.

Archaeological Survey of the Roxboro Road Widening Corridor, Fulton County, Georgia, Edwards-Pitman Environmental, Inc., Smyrna, Georgia.

Cultural Resources Survey of the White Bluff Road Improvement Corridor, Chatham County, Georgia, Hussey, Gay, Bell, & DeYoung Environmental, Inc., Savannah.

Cultural Resources Survey of the Atlanta Road Widening Corridor, Cobb County, Georgia, Piedmont Olsen Henley, Atlanta.

Cultural Resources Survey of the White Bluff Road Improvement Corridor, Chatham County, Georgia, Hussey, Gay, Bell, & DeYoung Environmental, Inc., Savannah.

Cultural Resources Survey of the Middleground Road Improvement Corridor, Chatham County, Georgia, Hussey, Gay, Bell, & DeYoung Environmental, Inc., Savannah.

Cultural Resources Survey of the Jimmy DeLoach Interchange Improvement Corridor, Chatham County, Georgia, Hussey, Gay, Bell, & DeYoung Environmental, Inc., Savannah.

Cultural Resources Survey of the SR 30 Road Relocation Corridor, Chatham County, Georgia, Hussey, Gay, Bell, & DeYoung Environmental, Inc., Savannah.

Cultural Resources Survey of the Blackwell Road Widening Corridor, Cobb County, Georgia, Greenhorne & O'Mara, Marietta, Georgia.

Cultural Resources Survey of the McCollum Parkway Road Improvements Project, Cobb County, Georgia, Greenhorne & O'Mara, Inc., Marietta, Georgia.

Archaeological and Historical Delineation of Ocmulgee/Macon Plateau. Georgia Department of Transportation, Atlanta.

Assessment of Effects to The Lewis Mound Site, 9BR7/636, Cartersville Parks and Recreation Department, Cartersville, Georgia

Archaeological Survey of the I-285 and Memorial Drive Interchange, Dekalb County, Georgia, HDR Engineering, Atlanta.

Historic Cemetery Delineations and Relocations

Cultural Resources Survey of the 25 Acre Bethlehem Tract and Cemetery, Bryan County, Georgia, Paulson Mitchell, Inc., Marietta, Georgia.

Boundary Definition of the Chastain Cemetery, Cobb County, Georgia.

Survey and boundary definition of the Shore Drive Housing Development and Cemetery, Chatham County, Georgia

Boundary definition of the Noonday Cemetery, Marietta, Georgia.

State of Georgia

Phase II Archaeological Testing and Archaeological Survey of the Albany Nursery Wildlife Management Area Dougherty County, Georgia, Georgia Department of Natural Resources, Atlanta.

Local Government Projects

Cultural Resources Survey of a 500 Acre Tract, The Pines Golf Course, Stephens County, Georgia, The City of Toccoa, Toccoa, Georgia.

Western Cobb County Historic Resources Survey, Cobb County Department of Community Development, Marietta, Georgia.

Western Cobb County Archaeological Resources, Cobb County Department of Community Development, Marietta, Georgia.

Utilities Projects

Phase II Archaeological Testing of Sites 9CK1087 and 9CK1089, Cherokee County, Georgia, Georgia Power Company, Atlanta.

Cultural Resources Survey of the McGraw Ford Substation Tract, and Phase II Evaluation of Site 9CK1062, Cherokee County, Georgia, Georgia Power Company, Atlanta, and Dial Cordy and Associates, Inc., Norcross, Georgia.

Archaeological Survey of the Proposed Palmyra Transmission Line Corridor, Dougherty County, Georgia, Georgia Transmission Corp., Atlanta.

Cultural Resources Survey of the Proposed Lake Secession 44kv Transmission Line, Anderson County, South Carolina, Duke Engineering Services, Charlotte.

Cultural Resources Survey of the Flat Rock Electric Power Transmission Line, Heard County, Georgia, Greenhorne & O'Mara, Inc., Marietta, Georgia.

Intensive Archaeological Survey of the Tater Hole Access Area Relocation Tract, Lake Rhodhiss, Burke County, North Carolina, Duke Power Company, Charlotte.

Intensive Archaeological Survey of the North Fork Access Area Relocation Tract, McDowell County, North Carolina, Duke Power Company, Charlotte.

Phase II Archaeological Testing of Site 9HK56, Hancock County, Georgia and Site 9PM689, Putnam County, Georgia, Georgia Power Company, Atlanta.

U.S. Army Corps of Engineers

Phase I Cultural Resources Survey of the Guss Creek Mill (1CH129), Chambers County, Alabama, US Army Corp of Engineers, Mobile District, Mobile.

Phase III Data Recovery of 8ES64, The First Pensacola Lighthouse, Pensacola, Florida, US Army Corp of Engineers, Mobile District, Mobile.

Phase II Excavations of Field Site 1, Anniston Army Depot, Calhoun County, Alabama, US Army Corp of Engineers, Mobile District, Mobile.

Phase II Archaeological Testing and Mapping at Allatoona Lake, Georgia. US Army Corp of Engineers, Mobile District, Mobile.

Phase I Cultural Resources Survey and Mapping of Historic Period Cemeteries at West Point Lake Alabama and Georgia, US Army Corp of Engineers, Mobile District, Mobile.

Independent Research

Archaeological survey of the Northern Washington County Pottery District, Washington County, Georgia, thesis research, Georgia State University, Atlanta.

Phase II Archaeological Testing of Site 9WG86, The Cyrus Cogburn Kiln Site, Washington County, Georgia, thesis research, Georgia State University, Atlanta.

Archaeological Survey and Site Reconnaissance of the Gillsville Pottery District, Hall and Jackson Counties, Georgia. Independent Study, Georgia State University, Atlanta.

Ceramic Typology of the Jug Factory Pottery District. Independent Study, Georgia State University, Atlanta.

Archaeological Survey and Site Reconnaissance of the Jug Factory Pottery District, Barrow, Jackson, and Oconee Counties, Georgia. Independent Study, Georgia State University, Atlanta.



HISTORIC PRESERVATION DIVISION

MARK WILLIAMS
COMMISSIONER

DR. DAVID CRASS
DIVISION DIRECTOR

March 22, 2019

Jeff Pruitt
Deputy Director of Operations
City of Roswell
38 Hill Street
Roswell, Georgia 30075

**RE: LWCF: Construct Trail, Ace Sand Company Park, 705 Riverside Road, Roswell
Fulton County, Georgia
HP-190301-001**

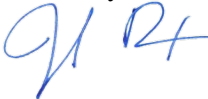
Dear Mr. Pruitt:

The Historic Preservation Division (HPD) has received the information submitted concerning the above referenced undertaking. Our comments are offered to assist the National Park Service and its applicants in complying with provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA).

The subject project consists of improving an existing trail within the Ace Sand Company property located at 705 Riverside Road in Roswell, to include trail improvements and additions, fitness stations, benches, trash receptacles, and interpretive signage. Based on the submitted information and additional desktop research, it appears to HPD that no historic properties that are listed or eligible for listing in the National Register of Historic Places (NRHP) will be affected by this undertaking, as defined in 36 CFR Part 800.4(d)(1). Please note that historic and/or archaeological resources may be located within the project's area of potential effect (APE). However, at this time it appears that they will not be impacted by the above-referenced project, due to the scope of work and previous disturbance.

This letter evidences consultation with our office for compliance with Section 106 of the NHPA. It is important to remember that any changes to this project as it is currently proposed may require additional consultation. HPD encourages federal agencies and project applicants to discuss such changes with our office to ensure that potential effects to historic resources are adequately considered in project planning.

Please refer to project number **HP-190301-001** in any future correspondence regarding this project. If we may be of further assistance, please contact me at (770) 389-7851 or jennifer.dixon@dnr.ga.gov.

Sincerely,


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

cc: Allison Duncan, Atlanta Regional Commission
Antoinette Norfleet, DNR

APPENDIX D
Public Comments and Responses



Environmental Assessment Comments for the Park Fitness Loop Trail and Adventure Path

Roswell, Ga. (May 28, 2021)—The City of Roswell invites members of the public to review and provide feedback on a draft of the Environmental Assessment for the Park Fitness Loop Trail and Adventure Path project proposed along a tract of the river frontage that was previously occupied by the Ace Sand Company. **The 30-day public comment period begins at 1 p.m. on Wednesday, June 2, 2021, and continues through Tuesday, July 6, 2021.** Draft copies of the May 2021 Environmental Assessment will be available on the City of Roswell's website at www.RoswellGov.com/Grants. Comments may be submitted to grants@roswellgov.com.

Comment 1

This is a great opportunity for a multiple use sand volleyball site. I see usage here but it could be even better. Promote sand volleyball tournaments and leagues in Roswell and this would be a great site. I do not play regular volleyball and do not even use this site. I no longer live in Roswell but do live by Newtown Park. I just go by the area a lot and see enough use that I know this could be big for Roswell. I would be looking at a minimum of four lighted courts for leagues and tournaments. It is a really popular sport. I also lived in Tampa by Clearwater beach and if you could get a professional tournament here. Wow!!!

Response 1

The fitness trail loop project scope does not include additional volleyball courts.

Comment 2

Please reevaluate the use of this land. Forget the fitness loop (passé) and adventure trail. These would create initial curiosity but would quickly be little used. All people that I know or who I have spoken with are interested in walking, biking and experiencing nature in as natural setting as possible— not contrived outdoor experiences! I know it sounds good and perhaps even makes grant writing more attractive, but, the beauty along our river is and should always be the LEAST amount of development possible. People want to feel they are far from the hectic life of the city and experience the tranquility of the outdoors. The entire area is really subject to flooding. That should be the number one focus! Then people would have use of this area much more of the time....rather than finding areas closed or so muddy that there's is no access! Please keep it simple and in so doing, beautiful. Roswell has something valuable and precious. Please don't destroy with trying to develop into something that is not natural or striving to

38 Hill Street, Roswell, GA 30075
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establish “activities” that are most definitely not needed. Simplicity is the answer. Thank you for taking these points into consideration.

Response 2

The design of the fitness trail loop uses the existing multi-use trail on the north side of the park and the existing service road on the south side of the park. The design for the trail to the south decreases the existing footprint and includes recovering some of the exiting path and converting it to native landscaping. The adventure trails in the center promote small foot paths made from natural surfaces minimizing the impact on the natural environment. It appears based on your comments and the intended design, that the project is consistent with a natural recreational environment while promoting health, wellness and river oriented recreation.

Comment 3

I have been a River Bluff Pkwy, Roswell resident for 19 years now, and have waited patiently for the City to address the lack of a bicycle lane from the Swift School to the Riverside intersection. It can't be more than 1/2 mile on this stretch, and putting a “Share the Road” sign there isn't good enough. That is an extremely dangerous area for bicyclists! My husband and I are avid bicycle riders, and refuse to ride anymore because there is only about 4” of space available on the side of the road in that area. My car with a bike rack got totaled a few years ago, so we can not get to Don White Park without driving, not to mention having to find a parking space. What a waste it was to have to load up the bikes, drive maybe 2 miles to be able to ride, instead of being able to do it all SAFELY on a bike. I have already been hit once while on a bike, resulting in a broken femur and 6 months in a body cast. I am not risking that again until this area is safer.

When I moved to this area, part of the attraction was the river recreation, and Roswell was supposedly “Bicycle-Friendly”. It is now very much more crowded and that piece of road is still unchanged. Since you are taking resident's comments about the proposed development across the street from my property, which backs up to Riverside, why not put in marked bike lanes on both sides of Dogwood? I can't tell you how many people over the years I've talked to that ride on Grimes Bridge but are terrified of going from the school down to Riverside on a bike. This park and this area will have greater utilization if it had a bike lane to get there. I would imagine all the taxes I've paid over the years would more than cover that tiny area.

Response 3

The project is limited to the project area defined in the scope of work and does not include bike lanes on public roads outside the project area. Roswell Department of Transportation's Bike and Pedestrian Master Plan address the priorities and development of bike lanes and multi-use trails described in this comment.

Comment 4

I have the following questions regarding the ACE Sand Plant EA.

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Does the EA consider the Metropolitan Rivers Protection Act and the limits on disturb land and impervious surface area? Was the no action alternative or other alternatives considered? Thank you for specifying native plants.

Response 4

Yes, the Metropolitan River Protection Act (MRPA) and the associated impervious surface areas have been considered in the design of this project. The City has coordinated with the Atlanta Regional Commission (ARC) and determined the project area is within MRPA Categories B and E. MRPA Category E limits impervious surfaces to 15% and disturbance to 30% within the designated category. Because of the historic land use within the Ace Sand parcel, there is an abundance of existing impervious surface areas. All proposed work will reduce impervious surfaces and improve the permeability of the site.

Native landscape is left undisturbed to the greatest extent possible. Existing disturbed areas have been improved resulting in net positive change. The Environmental Assessment (EA) for the Land and Water Conservation Fund (LWCF) grant is not a typical National Environmental Policy Act (NEPA) document that identifies a no action alternative and multiple design/location alternatives. The LWCF EA is required to include three major sections. Section 1 is a description of the proposed project with major and minor benefits identified. Section 2 describes the existing environmental and what can be expected of the area if the project is not funded, and Section 3 is a discussion of the direct and indirect changes to the environment resulting from the proposed project. As such, a no action alternative or other alternatives were identified in the EA.

Comment 5

I am a resident of the Martin's Landing community and think the fitness loop trail would be a great addition to the space as this area is already so wodely used by people walking, jogging, and biking. I would love for this to be approved for our community.

Response 5

Thank you for your comments.

Comment 6

I think it's a great idea.

Will traffic be impacted by the project? How long will this take, as I take this way home from work currently. I love the area. The walking path along the riverside already has so much nearby. National park trails, shoot the hooch and rowing schools, recreation centers and parking lots. Will the parking lots be taken away?

38 Hill Street, Roswell, GA 30075
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Response 6

Minimal traffic disturbance is expected from this project and the total construction timeline is approximately 12 months once fully funded. Existing parking will not be impacted by this project.

Comment 7

Hello, thank you for developing the Ace Sand land! Will there be anything there for toddlers to do? Roswell does not have many toddler-friendly play areas. I couldn't find a description of the Childrens' Stormwater Garden.

Response 7

This Environmental Assessment is specifically related to Phase 1 - the Fitness Loop Trail. Phase 1 is designed to provide enhanced fitness opportunities within the limit of existing site disturbance and impervious surface. Proposed fitness elements are primarily contained along the Riverwalk path and the existing trail along the waterfront and are designed for use by teenagers and adults.

In addition, a mulched adventure trail is proposed within the existing woodland. While not specifically designed for toddlers, the design elements within the adventure trail portion provide for flexibility of use by all ages – specifically, the sawn log steppers and seating elements. In Phase 2 – the Childrens' Stormwater Garden, the proposed design provides significant play opportunities for both toddlers and older children, in addition to passive park features that can be enjoyed by people of all ages and abilities.

We encourage you to review the complete Ace Sand Site design at www.RoswellRiverparks.com.

Comment 8

I am glad to see the forest restoration portions of the proposal. That area is heavy with invasive plant species as the report points out. Removing those is a necessary first step. Are there plans and procedures to continually manage the site to keep the invasives away?

Currently Roswell does not appear to have a workable invasive plant control protocol in place. Chinese privet and english ivy are smothering many parts of the Roswell Area Park. Chinese

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wisteria has a very strong presence in Leita Thompson Park along MountainPark Road and english ivy is advancing from the west in that park.
The initial plans look excellent. I just hope that protocols to properly manage the area are a part of those plans.

Response 8

The design improvements include plans for invasive removal, and replacement with native species. This includes the addition of engineered soils that contain a significant percentage of sand. The sandy soils will encourage the native plants to establish while limiting the growth of invasive plants. In addition, a forestry management plan has been prepared under the design contract for use by the City in guiding future efforts for managing invasive and ensuring long term health of the canopy.

Comment 9

Hi Danny. I just saw the Ace Sand Company project and I'm curious about the beach volleyball courts. I don't see the mentioned in the project plan. Do they yfall outside the project area or are we losing the courts?

Response 9

The volleyball courts fall outside the current project area and the 2016 approved master plan described the future use and location of the volleyball courts. The Master Plan can be found at www.roswellgov.com/parkplanning

Comment 10

Where would someone park their car?

Response 10

The Fitness Loop Trail is integrated with, and in close proximity to, Don White Park, parking for this phase will utilize the existing Don White Park parking lot. Overflow parking will be available in the gravel lot at the former Ace Sands facility to the west of the Fitness Loop Trail. Future phases of the Ace Sand site build-out provide for 80 additional parking spaces to be added. We encourage you to review the complete Ace Sand Site design at www.RoswellRiverparks.com.

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Comment 11

I'm pretty excited about turning this land into usable public space. My main concern is the smell. I have no idea what causes such an awful smell in that area. If you can't figure it out and mitigate it, a children's garden won't be very successful. No one will want to spend a couple of hours walking or playing there and then come home smelling like Union Camp down in Savannah used to.

Response 11

The smell associated with the sewer system is outside the scope of this project and falls under Fulton County's jurisdiction.

Comment 12

I read with excitement about the new fitness loop park but I wanted to add my two cents worth and ask if there are plans to add decent bike lanes between St Andrew Church and Dogwood, while this project is under construction?

That stretch of road, and especially the segment between the 925 R'side Road sign and the fork at Dogwood (see edited screen shot below) is one of the most dangerous to cyclists and cars trying to pass. That section is very frustrating to drivers as well, as there is no room to safely pass folks on bikes, because that part of the road is so narrow.

Response 12

The project is limited to the project area defined in the scope of work and does not include bike lines on public roads outside the project area. Roswell Department of Transportation's Bike and Pedestrian Master Plan address the priorities and development of bike lanes and multi-use trails described in this comment.