Chapter 6

CONSULTATION AND COORDINATION

Marietta Mill Site

Chattahoochee River National Recreation Area
Final General Management Plan/
Environmental Impact Statement

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CHAPTER 6
CONSULTATION AND COORDINATION

SUMMARY OF PUBLIC INVOLVEMENT

The general management planning process involves many steps including: identification and confirmation of the park purpose, significance and mission goals; acknowledgement of special mandates, laws, and policies; involvement of the public and identification of issues; development of alternatives; and impact analysis. Agencies and the public were invited to participate at various steps throughout the planning process, and this coordination and involvement is described in this chapter.

The intent of the scoping process is to provide for early identification of concerns, issues, expectations, and values of existing and potential visitors, neighbors, cooperating associations, partners, scientists, scholars, and other government agencies. Public input gathered during the scoping process is used to assess and compare the effects of each available management alternative.

Scoping letters were mailed in the Spring of 2002 to local, state and federal agency representatives, tribal representatives and the public that contained information on the function of a general management plan, statements of the park purpose and significance, information on the planning team and the process for planning, and methods available to the public for communicating with the team and participating in the planning effort. A newsletter was published announcing the initiation of the planning process, and the public was invited to voice issues and suggest ideas for the future of the park at six public scoping meetings held in October 2000 and over a 60 day comment period. Over 200 written comments were received. A majority of the comments expressed concerns about access, facility needs throughout the park, habitat preservation, environmental impacts, different types of use, trails, education, boundaries, fisheries and fishing, and enforcement. In addition, over 20 meetings were also held with more than 50 area Planning and Greenspace Directors and local, State, and Federal agency representatives.

Information from the scoping meetings was used to develop a range of desired future conditions, or prescriptions for the park. Based on the results of the planning process, three management alternatives were developed: Alternatives B, C and D. In addition, Alternative A, the No Action alternative was also included for analysis.

Information regarding the preliminary alternatives was posted on the park's website, and a newsletter was also distributed to announce the availability of the Draft General Management Plan and Environmental Impact Statement in June, 2004. The Draft General Management Plan and Environmental Impact Statement was released in May, 2004, and there was a 60 day comment period. Public meetings were conducted on June 14, 15 and 16, 2004. The distribution list for the document in provided in Appendix H. Copies of the May, 2004 Draft Plan were also made available at 10 local libraries and at Island Ford, Park Headquarters. The Draft was made available for review in a variety of means: electronic format on the park's website, and approximately 40 CDs were mailed out, as well as a limited number of hard copies from the park or regional office. In addition, approximately 300 copies of the executive summary were distributed to the mailing list and emailed where possible.

Many criticisms were voiced during the public comment period regarding prescriptions for boating and fishing within the park, off-road bicycle use and other types of recreational use and access. In response to the input received, additional meetings were conducted with stakeholders in the community. The park has on-going stakeholder meetings on a quarterly basis to provide information regarding the general management planning status, other projects in the park, and general information sharing.

Based upon the input received, two additional alternatives were developed, Alternatives E and F to address the concerns raised. A newsletter was published in November of 2005 to update the public on the status of the plan, describe the new Alternatives E and F, and invite the public to attend meetings to discuss the new alternatives. Public meetings were announced and conducted on December 12, 13 and 20, 2005, with comments requested by January 31, 2006. Coordination letters were also sent to reviewing agencies to update them on the status of the plan in the spring of 2006.

This General Management Plan incorporates these comments and describes and analyzes each of the six alternatives. Each of the alternatives was the result of mapping management prescriptions, or kinds and levels of management and use. Each of the alternatives for the park consists of multiple zones with different management prescriptions.

Public service announcements were distributed, newspaper notices were published, flyers were distributed and signs were posted prior to each of the series of public meetings. In addition, newsletters were distributed prior to each set of public meetings for the Draft document. The public had many avenues by which it participated during the development of the plan: participation at public meetings, responses to newsletters, written letters, comment cards, and comments on the park's planning website.

The general management planning information is available on the project website at http://parkplanning.nps.gov.

CONSULTATION WITH OTHER AGENCIES / OFFICIALS AND ORGANIZATIONS

In addition to the consultation described above, additional consultation with agencies was conducted prior to completing the 2004 Draft General Management Plan / Environmental Impact Statement and again during the development of the 2008 Supplemental Draft document. Agency coordination letters are included in Appendix F.

In accordance with 36 CFR 800 and the Programmatic Agreement between the Advisory Council on Historic Preservation, the National Conference of State Historic Preservation Officers and the National Park Service, a letter was sent to the Georgia State Historic Preservation Office and to the Advisory Council on Historic Preservation to initiate consultation (see Appendix F). The letters invited them to participate in the planning process and informed them that the National Park Service plans to use this environmental impact statement to fulfill the requirements of Section 106 of the National Historic Preservation Act as well as comply with provisions of the National Environmental Policy Act.

In accordance with Section 7 of the Endangered Species Act (16 U.S.C. 1531 et seq.), the National Park Service contacted the U.S. Fish and Wildlife Service by letter to initiate consultation (see Appendix F) and to provide a list of threatened and endangered species, critical habitats, and species of concern. The Georgia Department of Natural Resources Natural Heritage Program was also contacted to provide a list of threatened and endangered species.

Consultation letters were also sent to the Environmental Protection Agency, Region 4 and the Georgia Department of Natural Resources, Environmental Protection Division. A list of agencies contacted is provided in Appendix H. In addition, letters were sent in January 2001 to Federally-recognized American Indian Tribes with ancestral lands in Georgia requesting feedback concerning the general management plan. These letters were followed up with individual phone calls and a subsequent letter identifying the purpose and need of the project and requesting input. A copy of this letter request and the list of American Indian Tribes contacted are included in Appendix F.

COMMENTS ON, CHANGES TO, AND RESPONSES TO COMMENTS ON THE SUPPLEMENTAL DRAFT PLAN

Availability of the Supplemental Draft General Management Plan/Environmental Impact Statement

The Supplemental Draft General Management Plan / Environmental Impact Statement was made available for public review in September, 2008. Public meetings were held on the 27th and 30th of October, 2008. A meeting with stakeholders was conducted on October 6, 2008. Public comment was solicited during both public meetings; electronic and hardcopy comments were collected during the public comment period between September and December 1, 2008. Copies of the Executive Summary from the Supplemental Draft were sent to 350 recipients. Copies of the Supplemental Draft were made available to those requesting a copy; copies were also available at park headquarters, and 11 regional public libraries. CDs of the Supplemental Draft were mailed to 107 individuals, agencies, organizations and tribes; hard copies and CDs were handed out at public meetings and park headquarters. The Supplemental Draft was also posted on the Web under the park's website as well as the National Park Service Planning, Environment and Public Comment website. Media and public service announcements were sent to local and regional newspapers and magazines, radio and television stations, and notices were posted at park units and park headquarters (see Appendix H for listing).

Changes to the General Management Plan/Environmental Impact Statement

Changes made to the General Management Plan/Environmental Impact Statement as a result of public comment include the following:

- Tables 2 and 3 were changed to reflect that off-road bicycling is an appropriate activity in the Natural Area Recreation Zone, Developed Zone, and Rustic Zone on designated trails only.

- Text was added to Chapter 2, Visitation, Land Acquisition, and Facilities, to reflect the National Park Service's commitment to sustainability through the consideration of sustainable practices in planning, design, and construction of proposed facilities.

Sustainable design and sustainable practices/principles are added to and defined in the Glossary of Terms.

- Text was added to Chapter 2, Visitation, Land Acquisition, and Facilities, to clarify that planning for future facilities, including trails, incorporates environmental review in compliance with the National Environmental Policy Act, the National Historic Preservation Act, and other laws and regulations. Future project environmental reviews will be site specific, and address cultural and natural impacts as well as park operations (i.e. maintenance, management, enforcement, safety and use), visitor experiences, and have opportunities for public input.

- The list of media contacts was added to Appendix H.

- Other minor changes were made to the document to edit for consistency.

Comments on the Supplemental Draft General Management Plan/Environmental Impact Statement

Comments on the Supplemental Draft General Management Plan/Environmental Impact Statement were invited by all means and received in several different formats, including comment cards, public meeting transcripts from public meetings, letters, e-mail, and postings on the National Park Service Planning, Environment and Public Comment website. Comment sheets were handed out at public meetings, stakeholder meetings, and from park headquarters. Over 145 individuals entered comments on the National Park Service Planning, Environment and Public Comment website. All comments received are considered part of the administrative record.

Responses to Comments on the Draft Plan

Letters and Web comments received from agencies are reprinted in full. Substantive comments are highlighted in the body of each letter, and a response to the comment is provided on the page beside the copy of the letter. Agency letters were received from the Centers for Disease Control and Prevention, the Environmental Protection Agency, and the Georgia Department of Natural Resources, Wildlife Resources Division. In addition, Mr. Jim Santo, Principal Planner with the Atlanta Regional Commission wrote via email that the "ARC staff concurs with the adoption of the Preferred Alternative (Alternative F).

Other substantive comments from individuals and organizations are paraphrased or reprinted in their entirety, and National Park Service responses are provided in the pages that follow. Comments are considered substantive if they:

- Question, with reasonable basis, the accuracy of information in the Environmental Impact Statement

- Question, with reasonable basis, the adequacy of the environmental analysis

- Suggest different viable alternatives

- Cause changes or revisions in the proposal

Comments in favor of or against the preferred or other alternatives, or comments that only agree or disagree with National Park Service policy, are not considered substantive. National Park Service has responded to comments in order to clarify policy, position, or procedure.

All comments received were reviewed, grouped by topic and responses were developed. Comments were either taken directly from the author or paraphrased to reflect the similar nature of comments received. Each of these comments is followed by a National Park Service response and presented in the pages that follow.

Access and Visitor Experience

Comment: The Chattahoochee River National Recreation Area General Management Plan should preserve natural resources and provide opportunity for solitude and isolation. The focus of the plan should not be about access.

Response: The purpose and mission of the park are as stated in the legislation establishing the park and presented in *Chapter 1, Purpose and Need for the General Management Plan*. The park's management alternatives provides a broad range of visitor uses and experiences that satisfy diverse visitor interests, including opportunities for solitude and isolation as well as varied river and trail experiences while providing for resource protection and preservation.

Comment: The EIS is wishy-washy in its analysis of visitor experience.

Response: Due to the varied nature of visitor interpretation of experiences, a range of impacts were provided. Visitors have a variety of needs, desires, and preferences, and the method of impact analysis is consistent with National Park Service policies and procedures.

Comment: The emphasis on increased access, by foot and bicycle, from neighborhoods and office complexes, in addition to greater trail interconnectivity has been only considered in this EIS as an advantage, rather than the management and supervisory issue that it inherently represents in such a scenario.

Response: Increased access was considered an advantage with respect to the issue of access, which was raised frequently during the scoping phase of the planning process. However, the potential negative impacts of increased connectivity were also considered during the process of selecting the preferred alternative. Ultimately, Alternative F was selected as having the greatest importance of advantages for the cost of all the alternatives (the Choosing By Advantages process is described in *Chapter 2, Selecting the Preferred Alternative*).

Boating

Comment: There is a need for a new deep water boat ramp for motorized boats at the Paces Mill unit downstream of the new Cobb Parkway Bridge. Other specific locations for additional boat access were named including Cochran Shoals, Holcomb Bridge, Island Ford, Settles Bridge, Highway 20, and McGinnis Ferry.

Response: There are no specific boat ramps planned or identified in the General Management Plan. An environmental assessment for seven new or refurbished river access facilities (4 refurbished boat

ramps plus 3 new step down ramps) was recently completed in 2005, with construction completed in 2007. Any future facilities would be subject to analysis of environmental impacts, per the National Environmental Policy Act of 1969, public input and availability of funding.

Comment: The park should limit gasoline powered boat engines to 9.9 horsepower.

Response: The Georgia Department of Natural Resources, Wildlife Resources Division regulates boating use within the state, including the Chattahoochee River. The state has no restriction regarding horsepower of gasoline powered vessels on the Chattahoochee River within National Park Service boundaries. The state has designated no wake zones within the park. All visitors must comply with boating regulations, policies and safe handling practices.

Comment: Motorized boating should be banned within the park due to safety concerns and conflicts with other park users.

Response: The park's management alternatives provide a broad range of visitor uses and experiences that satisfy diverse visitor interests, including opportunities for solitude and isolation as well as varied river and trail experiences. Alternatives were created to include motorized vessel use throughout the park as a result of public input on the 2004 Draft General Management Plan.

Comment: Permitting motorized boating within the National Recreation Area does not meet the mission of the National Park Service as stated in the National Park Service Organic Act. The River Zone of both Alternative E and F significantly impairs natural resources, namely solitude and natural soundscape throughout the entire park. Therefore, these two alternatives are not acceptable.

Response: Boating and other motorized forms of recreation occur in many national parks. There was no prohibition of motorized boating either before the creation of the park or when the park was established, and no mandate to do so either by the park's legislation or by the National Park Service Organic Act. As long as the resources and values for which the park was created remain "unimpaired" as a result of boating, then there is no mandate to stop boating. "Unimpaired" as defined by the National Park Service does not mean un-impacted. All human use of natural resources causes some measurable impact. Impairment is defined in *Chapter 4 Environmental Consequences, Impact Assessment Methodology*.

Boundary Expansion / Private Property Rights

Comment: Purchasing additional lands that would include the entire watershed of certain tributaries would enhance the environmental integrity of the River.

Response: The National Park Service has no authority or funding to purchase lands outside the presently authorized boundary of the Chattahoochee River National Recreation Area.

Comment: Does the recommended management plan have any impact on private property along the river?

Response: The National Park Service can only acquire land through willing sellers within the authorized boundary. The National Park Service will not "take" private property for public use. No trails will be planned that would cross private parcels without prior approval from the property owner. The NPS will coordinate with private property owners regarding conservation easements on private property where it is deemed more suitable than fee simple acquisition for the purposes of public access

and connectivity. The National Park Service will continue to coordinate with other agencies, organizations, and partners for connectivity where it is mutually agreeable and in keeping with National Park Service management policies.

Costing

Comment: The proposed Alternative F is nearly 50% more expensive than Alternatives A or B, according to Appendix D of the Study. There is no justification for spending the extra funds. Alternative F is within $500,000 of the most expensive alternative proposed. This level of differential is unjustifiable and constitutes irrational spending absent solid reasoning and publicly available value analysis of each project in each alternative.

Response: The National Park Service uses a method called Choosing by Advantages to select the preferred alternative. A multi-disciplinary planning team decided the relative advantages of each alternative and then decided the relative importance of the advantages. Finally, the total importance of the advantages for each alternative was charted in relation to the total cost of each alternative. Using this process, Alternative F was determined to provide more benefit for the cost than any other alternative. The costs presented in General Management Plans are intended for comparison purposes only and are not to be used for budgeting for capital projects. They are rough order of magnitude estimates based on very general management concepts.

Comment: Cost calculations and the assumptions contained in the General Management Plan were not located within the publicly available documents. This constitutes incomplete disclosure, as there may have been left out key assumptions for the ongoing management of the Park that are relevant to public consideration.

Response: The costs presented in General Management Plans are intended for comparison purposes only and are not to be used for budgeting for capital projects. They are rough order of magnitude estimates based on very general management concepts. A discussion of the cost analysis is included in *Chapter 2*. The details regarding the selection of the preferred alternative is also provided in *Chapter 2*.

Comment: The Plan does not demonstrate that Alternative F's increased burden on ongoing operational and security costs (operational spend vs. capital spend) have been adequately considered and factored into the estimated life cycle budget.

Response: Alternative F requests 20-22 additional employees (full time equivalents) and a substantial budget increase over current conditions, which, if approved and funded, would relieve the burden.

Comment: There is not publicly available a list of the capital projects included in the Alternatives. There is overly broad characterization of the types of projects and inadequate public disclosure of actual projects planned and incorporated into each Alternative

Response: Lists of specific capital projects are beyond the scope and purpose of General Management Plans. The General Management Plan is intentionally broad and conceptual in nature, as is explained in *Chapters 1* and *2*.

Comment: During the Oct. 30, 2008 public meeting, the Superintendent alluded to a pedestrian bridge over the Chattahoochee River. This fact was not disclosed to the public in the Plan. Further investigation has

revealed that the proposed bridge will link non-NPS land with Hyde Farm and will cost an estimated $1.2 million ($2008). The bridge purportedly will be wide enough for golf carts (the bridge will link a golf course to historic Hyde Farm). There will be a maximum of only 125 parking spaces on the city acreage linked to Hyde Farm over the river via the golf cart bridge. There is therefore no compelling reason to connect to non-NPS lands and spend Federal taxpayer money to build this bridge. The "connectivity" desired is provided by the river itself; bridges are neither necessary nor consistent with the enabling legislation. The Chattahoochee golf cart bridge at Sandy Springs/Hyde Farm should either be specifically eliminated from the Plan or specifically included in its detail so that the public and Congress can understand the direction the NPS, under the cloak of overly broad characterization, is taking the CRNRA.

Response: Specific capital projects are not included in general management plans, and no specific capital project has been proposed or recommended in the Chattahoochee River National Recreation Area General Management Plan/Environmental Impact Statement. An environmental assessment is currently underway that addresses this proposal and there will be ample opportunities for public review and comment. The project will only consider pedestrian and bicycle access and no construction funding has yet been identified or secured.

Comment: If one of the main arguments against the current No Action Alternative A is that there is not enough money to fund current staff positions, it does not make sense to approve an additional 20 to 22 personnel for Alternative F if the funding is not forthcoming. Alternative B provides the best protection of natural resources for the least money, with 20 year cost around $42-$45 million as opposed to Alternative F's $70-$78 million. Again, if there is currently not enough money to fund eight (8) approved positions, causing some instances of non-compliance, then, even more, unfunded positions and programs will wreak havoc with resource monitoring and environmental compliance.

Response: One goal of the General Management Plan is to set a vision for future management of the park that might be ambitious but is focused on creating the best combination of resource protection strategies and visitor experiences that is achievable. It is well understood that funding to accomplish all the objectives in the General Management Plan may not be available for years and language to this effect is found in *Chapter 1* and *Chapter 2*.

Enforcement

Comment: Supervision and enforcement are critical issues, which seem to have been given rather short shift in the current EIS.

Response: One goal of the General Management Plan is to set a vision for future management of the park that might be ambitious but is focused on creating the best combination of natural and cultural resource protection strategies, and visitor experiences that are achievable. It is well understood that staffing and funding to accomplish the objectives in the General Management Plan may not be available for years and language to this affect is found in *Chapter 2, Comparative Cost Analysis*. The types of hires (environmental compliance specialist, visitor protection rangers, rangers for interpretation, maintenance, etc) are described under each alternative in *Chapter 2, Range of Annual Costs*. The park submits requests for increased operational funding based upon needs. Upon receipt of funding, additional staff are hired. Supervision and enforcement are covered under the topic of Efficiency of Park Operations which was discussed at length and evaluated for each alternative in the process of selecting the preferred alternative.

Comment: With what tools is enforcement to be addressed? Is "increased ranger presence" sufficient? Would cameras at access points be considered? How is the "park closes at dark" rule enforced, other than at parking lots? If there are more access points for walkers and bicyclists, what is to prevent after dark activity?

Response: Enforcement is provided by National Park Service rangers. A description of each alternative and proposed increase in staff including enforcement rangers is provided in *Chapter 2*. The park has requested funding to install cameras at parking lots for security purposes, and for motorized gates at all vehicle access points that would close automatically during the hours the park is closed. The park is surrounded by subdivisions, sidewalks and roads and will always be vulnerable to after hours access by pedestrians and bicycles. Park closures are enforced by National Park Service rangers.

Future Management Plans

Comment: National Park Service should designate additional flow studies of the Chattahoochee River as top priorities for funding so that the Service will have all the necessary information at its disposal to protect recreational flow levels as decisions are made regarding river management to cope with the water crisis in north Georgia and the tri-state area. The National Park Service should also make the commercial services planning effort a high priority so that visitors without canoes/kayaks/rafts or other crafts will be able to easily enjoy the river itself as well as other park lands.

Response: The management plans and studies (including the flow studies) identified in *Chapter 5* are subject to funding availability. The park submits requests for project funding, including research studies, on an annual basis. These projects are evaluated against established ranking criteria, and compete for limited funding against projects submitted by all NPS units service-wide. The park has funding to prepare a Commercial Services Plan which will commence upon completion of the General Management Plan.

Comment: Create a carrying capacity for safe float rental businesses on the upper 30 miles of river below Buford Dam because the current special use permit holders are negligent concerning safety with flows and hypothermia threats to paddlers.

Response: A commercial services plan will be developed that will include the assessment of visitor experience and environmental impacts as described in Chapter 5.

Noise

Comment: The noise limit on Bull Sluice Lake is a concern.

Response: Title 36 of the Code of Federal Regulations (section 2.12) prohibits noise exceeding 60 decibels, or making a noise that is unreasonable considering the nature and purpose of the actor's conduct, location, time of day or night, purpose for which the park was established, impact on park user, and other factors that would govern the conduct of a reasonably prudent person under the circumstances. Park rangers have the authority to enforce this regulation and do so as needed. The park will coordinate with local clubs and stakeholders to address river use and noise.

Partnerships

Comment: We urge the National Park Service to continue its financial and in-kind support of river awareness activities (such as the Back to the Chattahoochee River Race and Festival, River Discovery Series, BaceteriALERT Program, trash cleanups, privet removals, etc) and others to be developed in the future.

Response: The National Park Service recognizes the benefits of cooperative conservation (in accordance with Executive Order 13352, Facilitation of Cooperative Conservation) as well as the significant role partners play throughout the national park system. Success of the existing and/or increased partner activities is linked to the willingness of partners to participate, the capabilities of partners to team on projects or provide services, and the potential for partners to provide support funding (see also *Partnering* section of *Chapter 2*). The National Park Service will embrace partnership opportunities that will help accomplish the National Park Service mission provided that personnel and funding requirements do not make it impractical for the Service to participate.

Comment: The NPS should continue to hold quarterly meetings with all interested stakeholders to review accomplishments and challenges and to seek assistance with collaborative projects.

Response: It is the intent of the park to continue to conduct routine stakeholder meetings to discuss park activities, projects, challenges and accomplishments and continue to coordinate and collaborate with the park's stakeholders.

Comment: The emphasis that Alternatives D, E and F place on public/private partnerships creates a working environment that is prone to compromise the environmental integrity of the Park.

Response: The National Park Service recognizes the benefits of cooperative conservation (in accordance with Executive Order 13352, Facilitation of Cooperative Conservation), as well as the significant role partners play in achieving conservation goals and funding conservation initiatives on behalf of the national park system. The National Park Service has had many successful partnerships with individuals; organizations; tribal, state, and local governments; and other federal agencies that have helped fulfill their mission. Through these partnerships, the National Park Service has received valuable assistance in the form of educational programs, visitor services, living history demonstrations, search-and-rescue operations, fund-raising campaigns, habitat restoration, scientific and scholarly research, ecosystem management (river clean up, privet removal, etc), and a host of other activities. These partnerships, both formal and informal, have produced countless benefits.

Benefits often extend into the future, because many people who participate as partners connect more strongly with the parks and commit themselves to long-term stewardship. The park will continue to welcome and actively seek partnership activities with individuals, organizations, and others who share the National Park Service's commitment to protecting park resources and values and providing for their enjoyment. The park will embrace partnership opportunities that will help accomplish the National Park Service mission provided that personnel and funding requirements do not make it impractical for the National Park Service to participate and that the partnership activity would not (1) violate legal or ethical standards, (2) otherwise reflect adversely on the National Park Service mission and image, or (3) imply or indicate an unwillingness by the Service to perform an inherently governmental function (NPS 2006f).

Public Involvement

Comment: 99 Stat., Public Law 106-154 (12/9/99), Sec 105 C (2) (B) as amended requires that the Secretary provide adequate public involvement in the comment and review process. The public notification, postings of public meeting dates, and comment process lacked adequate notice and transparency to nearly the point of being clandestine.

Response: *Chapter 6 Consultation and Coordination*, provides a summary of consultation and coordination. *Chapter 6* has been revised to include all media notifications that took place, and the list of media contacts is included in Appendix H. The list of recipients is provided in Appendix H.

Comment: The Friends of Hyde Farm, presented as the NPS partner Community Service Organization in the CRNRA's Centennial Project Plan and Congressional filings and testimony, did not receive notice of the public meetings or the opportunity to comment. A large portion of Hyde Farm is part of the CRNRA and some of the more radical changes in impervious surfaces (bicycle and pedestrian bridges, paved trails, etc.) are proposed in Alternative F as changes at historical Hyde Farm.

Response: There is no cooperative partnering agreement in place between the park and Friends of Hyde Farm. It is our understanding that this friends group disbanded in late summer 2008. Members of the former friends group have been added to the mailing list for the General Management Plan/Environmental Impact Statement. Specific planning regarding the type and location of future trails will be addressed by environmental review, with opportunity for future public input.

Comment: Landowners and residents along portions of the river on the Cobb County side were not notified of the public meetings or the public comment/review period. These landowners are directly and adversely impacted by some of the proposed use and infrastructure changes in several of the Alternatives, including Alternative F.

Response: *Chapter 6 Consultation and Coordination*, provides a summary of consultation and coordination. *Chapter 6* and *Appendix H* have been revised to include all media notifications that took place. National Park Service policy is to provide an open format for public comment, without specific targeted audiences.

Comment: There seemed to be specific groups targeted for notice of the second of two public comment meetings, as the Oct. 30 public meeting was well-attended by mountain biking advocates. At least 80% of the attendees spoke as if they were mountain biking advocates over all other interests. They had apparently been well-briefed in advance of the meeting and were familiar with all the details of the plan. They

addressed their comments in large part in rebuttal to people who spoke on behalf of interests other than mountain biking, or who questioned the soundness of environmental assumptions made by the biking advocates. The Superintendent informed the public meeting that one of the mountain biking groups had offered 1,500 (or 1,700) hours of "free" volunteer labor to build bike trails. In fact, other volunteer labor had been offered for trail work for hikers and other projects in the past but turned down or simply not responded to by CRNRA. The clear impression was one of prejudicial mission and selective information-sharing, if not an outright tradeoff of services for policy. This type communication is not within the intent of the enabling legislation that requires open and fair public comment for all interested parties, and sufficient notice to the public of both meetings and timelines.

Response: The National Park Service has not favored one group over another or over the general public in its outreach efforts. Throughout the eight years of planning efforts, different groups supporting various alternatives or activities (fishing, boating, mountain biking, hiking, etc.) have organized themselves and used their own networks to affect large attendance at public meetings. See also responses to comments regarding partnering as well as other responses to comments regarding public involvement.

Regulatory Compliance

Comment: 92 Stat. 474, Public Law 95-344 (8/15/78), Sec 103 (c) as amended requires the Secretary to consult with the Secretary of the Army on plans that impact national areas adjacent or related to water resources. To my knowledge, this consultation related to the Plan has not taken place and there is no public record of the discussion or results.

Response: The U.S. Army Corps of Engineers was invited and attended agency coordination meetings in November, 2000. The Savannah District, Mobile District and the Chief Ranger from Lake Lanier received copies of the 2004 Draft General Management Plan/Environmental Impact Statement as well as the 2008 Supplemental Draft General Management Plan/Environmental Impact Statement (as listed in *Appendix H, List of Recipients*). The documentation of these meetings and coordination is included in the project administrative record, which is the public record.

Comment: 98 Stat. 2929, Public Law 98-568 (10/30/84), Sec 105 (d) 1 as amended requires an environmental assessment and environmental impact statement in conformance with, among others, the National Environmental Policy Act. Each and every additional bike trail and infrastructure component, and every change in designation/use of each area, should have its individual environmental study and assessment to address the issues of the impact on the natural habitat and water quality issues that the Secretary is charged with stewarding in the enabling legislation.

Response: All future development projects are subject to compliance with the National Environmental Policy Act, the National Historic Preservation Act, and other laws identified in *Chapter 1* and *Appendix E*. See responses to related comments under trails category.

Comment: The EIS does not appear to take into account fully the responsibility to Americans with Disabilities Act.

Response: *Chapter 1* identifies responsibilities under the Americans With Disabilities Act, Architectural Barriers Act, Re-habilitation Act, and other National Park Service management policies (NPS 2006f). These acts and policies are among the servicewide mandates and policies that guide park

management. These laws are also described in Appendix A. *Chapter 4, Visitor and Community Values, Table 35* contains references to threshold values for persons with disabilities in terms of accessibility. Individual park projects proposed in the future will consider ways to provide opportunities for visitors with limited mobility. Detailed design features addressing access are not included in this stage of general management planning, and will be provided on a project specific basis.

Sustainability

Comment: The document should reflect the commitment by the NPS to the use of pervious paving wherever possible to avoid impacts related to access and facility developments that may occur. The National Park Service should consider environmentally friendly construction techniques and avoid creating obstacles that hinder wildlife and plant communities.

Response: The National Park Service is committed to the planning, design and operation of facilities using sustainable practices/principles, including the use of pervious paving systems. Sustainable principles and National Park Service management policies address natural resource protection. These types of systems and other sustainable and efficient technologies will be considered for each project while taking into consideration social, economic and environmental benefits. Sustainable practices/principles will be considered in accordance with National Park Service Management Policies (NPS 2006) and executive orders. These practices and principles are design and planning considerations and will be addressed during implementation, with site specific conditions in mind. Text has been added to *Chapter 2, Visitation, Land Acquisition, and Facilities* that describes the park's commitment to sustainable practices. Sustainable design and sustainable practices /principles are also defined and added to the Glossary of Terms.

Telecommunication Facilities

Comment: Construction of telecommunication facilities anywhere in the park would be in conflict with the park's mission as set forth in 1978.

Response: The National Park Service is required to process telecommunication facility applications in good faith in accordance with the Telecommunications Act of 1996. Details regarding this provision are provided in *Chapter 1*. As stated in *Chapter 1*, should the proposal cause unavoidable conflict with the park's mission, the permit will be denied (NPS 2006f).

Trails

Comment: No new trails should be designed or constructed until all issues with use and damage to existing trails, maintenance, and enforcement have been satisfactorily resolved. The National Park Service should also consider user conflicts on trails (mountain bicycle, walking, hiking, jogging, and equestrian), including management, enforcement, safety, and resource impacts.

Response: Planning for trails and other future facilities includes environmental review in compliance with the National Environmental Policy Act, the National Historic Preservation Act, and other laws and regulations. Future project environmental reviews will be site specific, and address number, location, and cultural and natural impacts as well as park operations (i.e. maintenance, management, enforcement, safety and use) and have opportunities for public input. Visitor experiences, including potential use conflicts are included in the environmental review process.

Comment: Do not construct any hard surface trails within the 150-foot buffer along the river or tributary buffers as established by the Metropolitan River Protection Act.

Response: Trail location, materials, and methods of construction will be determined on a site specific basis and only after environmental review has been conducted, and opportunities for public input have been provided.

Comment: Provide for multiple-use trails within park boundaries.

Response: Multiple use trails are provided within park boundaries. Further development of multiple use trails will be considered on a site specific basis pending further site specific environmental review and opportunities for public review and comment.

Comment: Provide trail connectivity throughout Chattahoochee River National Recreation Area and into local parks. The converse of this issue was also expressed, voicing opposition to connectivity due to natural resource concerns.

Response: The National Park Service will coordinate with other trail planning entities including local city, counties and state agencies and other non-government organizations on a case by case basis. The National Park Service is only responsible for park owned land. Note other responses regarding environmental review and opportunity for public comment.

Comment: Issues regarding right of way on multiple use trails, injury, insurance, and liability should be considered by the National Park Service.

Response: For any accident on federal property, a visitor can file a tort claim. Right of way and site specific trail conditions will be addressed in separate site specific environmental review. Violation of 36 CFR (Code of Federal Regulations) and the Superintendent's Compendium would be subject to fine or court appearances, and are addressed on a case by case basis.

Trails at Hyde Farm

Comment: Proposals to develop bicycle trails within the Hyde Farm area are a concern.

Response: The section of the Hyde Farm property that contains the farm structures, dirt road, cleared areas, and some woodland areas has been zoned Historic Resource Zone, where off-road bicycling is not appropriate. The section of the property that is closest to the river is zoned Natural Area Recreation Zone, where off-road bicycling is appropriate. However, as stated in response to other comments: management zoning is the method used by the National Park Service to identify and describe the appropriate variety of natural resource conditions, cultural resource conditions, and visitor experiences to be achieved and maintained in the different areas of a park. Management zones also define appropriate levels and types of facilities and development for various areas of the park. Management zones do not specify the location, design particulars, or footprint of any facility nor do they guarantee that any particular type of facility, although permitted by the zone definition, will ever be developed within that zone. No facilities of any kind will be proposed for areas that are not suitable by virtue of environmental conditions or the presence of important cultural resources. No facilities will be proposed without further site specific environmental analysis and opportunities for public review and comment.

Mountain Bike Trails

Comment: Mountain bike trails should not be located at Gold Branch.

Response: Mountain bicycle trails are appropriate on designated trails only in the Natural Area Recreation Zone, Developed Zone, and the Rustic Zone under the preferred alternative, as described in *Chapter 2*, as well as *Table 3*. No new facilities, including bicycle trails, would be constructed prior to environmental review and opportunity for public input as well as funding. Under the Preferred Alternative, Gold Branch is zoned as a Natural Zone which prohibits off-road bicycling.

Comment: Any new bicycle trails must be thoroughly evaluated prior to construction and not implemented unless there is a long-term maintenance plan that is not dependent on NPS appropriations.

Response: All park operations, including maintenance activities are subject to appropriations. The park cannot operate solely based upon volunteer hours, partnerships and external sources of funds. No new facilities, including bicycle trails, would be constructed prior to environmental review and opportunity for public input as well as funding.

Comment: 92 Stat. 474, Public Law 95-344 (8/15/78), Sec 103 (a) as amended requires the Secretary to administer, protect and develop the CRNRA for the conservation and management of historic and natural resources including fish and wildlife. The opening of 62% of the land area to mountain biking threatens fauna and flora, including some rare species, and may increase soil erosion and adversely impact water quality. Widespread mountain biking, hard trail construction, additional impervious surfaces, and increased motorboat traffic on the river are clear violations of the intent of the enabling legislation.

Response: General Management Plan alternatives represent broad management approaches/frameworks for resource preservation and visitor use. Specific designs, layouts, footprints, and other individual project features are not part of General Management Plan alternatives, and are addressed separately during future implementation. Zoning, as applied in general management plans, is the method by which desired future resource conditions and visitor experiences are established for park managers to use in future decision-making. Each zone provides a set of allowable activities and facilities when specific local site conditions and resources are appropriate for them and only after alternatives have been developed, environmental review has been completed, the public has had an opportunity to review and comment, and funding has been made available. The fact that a particular zone may allow for certain activities or types of facilities does not mean that those facilities will be developed in that zone nor does it mean that such facilities would be allowed to cover the entire zone. To further clarify, 62% of the park will not be designated for mountain bicycle trails. In addition, *Table 3 Management Prescriptions - Alternatives E and F* has been changed to clarify that mountain bicycling is appropriate on designated trails only. Alternatives E and F allow for the continued use of motorized vessels in the park, which is similar to existing conditions.

Comment: Scientific research funded by the NPS shows the environmental impacts of-mountain biking are similar to those of hiking and far less than other uses.

Response: Impacts associated with trails are related to a host of factors, including: site specific conditions for slope, curves, wetness, soil type, soil erosion rates, vegetation, ecological conditions, invasive species, use levels, and visitor conflict management. These and other factors contribute to overall visitor experience and resource protection and have been addressed in studies in other national parks. No facilities will be proposed without further site specific environmental analysis and opportunities for public review and comment.

Water Quality and Aquatic Resources

Comment: We urge the NPS to focus on sewer spills, construction activities, and buffer encroachments on tributaries as well as the main stem of the Chattahoochee River.

Response: The NPS has developed a GIS database of sewer spills in and bordering the park and coordinates with local cities and counties regarding spill prevention, reporting and clean-up. The NPS will continue to cooperate with its neighboring cities and counties to address these concerns. Although management of construction activities, and permit review and compliance is the responsibility of the issuing authority, the park continues to review permits that buffer its boundary when notified by the permitting agency. The NPS does not have enforcement authority for activities outside its boundaries; however it does coordinate with local authorities to address encroachment issues where it is affecting park property.

Comment: The NPS should monitor water temperature and phosphorous levels.

Response: The NPS coordinates with the Georgia Department of Natural Resources, the United States Geological Survey and other agencies regarding monitoring for aquatic resources and water quality concerns.

Zoning, Alternatives and Impacts Associated with Individual Facilities

Comment: Zoning is too general; more details should be provided regarding individual facilities including trails and their impacts.

Response: Management zoning is the method used by the National Park Service to identify and describe the appropriate variety of natural resource conditions, cultural resource conditions, and visitor experiences to be achieved and maintained in the different areas of a park. Management zones also define appropriate levels and types of facilities and development for various areas of the park. Management zones do not specify the location, design particulars, or footprint of any facility nor do they guarantee that any particular type of facility, although permitted by the zone definition, will ever be developed within that zone. No facilities of any kind will be proposed for areas that are not suitable by virtue of environmental conditions or the presence of important cultural resources. No facilities will be proposed without further site specific environmental analysis and opportunities for public review and comment.

Comment: Do not construct facilities that cannot be maintained and funding guaranteed.

Response: One goal of the General Management Plan is to set a vision for future management of the park that might be ambitious but is focused on creating the best combination of natural and cultural resource protection strategies, and visitor experiences that are achievable. It is well understood that staffing and funding to accomplish the objectives in the General Management Plan may not be available for years and language to this affect is found in *Chapter 2, Comparative Cost Analysis*. The park submits requests for increased operational funding based upon needs. Upon receipt of funding, additional staff are hired.

Comment: Alternative B is clearly best for protecting natural resources.

Response: The discussion of the Environmentally Preferred Alternative in Chapter 2 describes each of the six criteria listed in the Council on Environmental Quality regulations for implementing the National Environmental Policy Act. As stated in the plan, Alternative B would best fulfill the responsibilities of each generation as trustee of the environment for succeeding generations (Criterion #1) and would best enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources (Criterion #6). However, Criteria 2, 3, 4, and 5 were judged to be best served by Alternatives E and F.

The National Park Service uses the decision-making process called Choosing by Advantages to select the preferred alternative based upon the importance of advantages. The process of selection Alternative F is described in *Chapter 2, Selecting the Preferred Alternative*.

Comments

DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Centers for Disease Control
and Prevention (CDC)
Atlanta GA 30333

November 25, 2008

Daniel R. Brown, Superintendent
Chattahoochee River National Recreation Area
1978 Island Ford Parkway
Atlanta, GA 30350-3400

Dear Superintendent Brown:

This is in response to the Environmental Assessment for *the Supplemental Draft General Management Plan/Environmental Impact Statement for the Chattahoochee River National Recreation Area for the next 20 years, June 2008*. This document was reviewed by the Centers for Disease Control and Prevention on behalf of the Department of Health and Human Services, U.S. Public Health Service.

We understand the National Park Service (NPS) is presenting 6 alternatives for the future management of the Chattahoochee River National Recreation Area. The proposed project seeks to define strategies that will allow for diverse visitor use, protect park resources, and provide for the enjoyment of the people. We are pleased to note that Alternative F, which seeks to expand use by local visitors and increase trail connectivity to neighboring communities, is the preferred alternative. These goals support community health. The Community Guide notes that, "Regular physical activity is associated with a healthier, longer life…. And found that people will become more physically active in response to the creation of or improved access to places for physical activity." (http://www.thecommunityguide.org/pa/pa-int-create-access.pdf) Your study should consider expanding its evaluation of the alternatives to include external impacts on local transportation systems and potential effects on public health. It would be appropriate to mention the health benefits of the recreation area as a beneficial outcome. 1.

We suggest an evaluation of the public health impacts of the alternatives. Additional evaluation areas might include: 2.

- Analysis of populations that will have access to the recreation area. Establish catchment areas and estimate populations that can access different park zones by transportation mode: private vehicle, public transit, pedestrian, and bike. 3.

- Impact of new entrances and connectivity to local pedestrian and bike systems that expand trail networks and thereby reduce automobile usage on: a) vehicle travel to the park and b) opportunities to use the recreation area trails for active (bicycle and pedestrian) commuting. This analysis could address the following areas:
  - Air quality
  - Opportunities for physical activity
  - Exposure to traffic injury

Responses

1. Transportation related issues and impacts associated with each alternative are described in *Chapter 4*. The park offers relatively similar benefits under all alternatives; public health was considered as an impact topic and dismissed.
2. The National Park Service does not have the survey data available that would be required to quantitatively analyze use of specific transportation modes by different populations. The transportation impact analysis provided in *Chapter 4* addresses issues identified during scoping. These issues are incorporated into a qualitative assessment of the potential effects of the alternatives on regional and local transportation resources. The analysis suggested is beyond the general scope of this plan, which is conceptual in nature
3. The analysis suggested is beyond the scope of the *General Managemant Plan*, which is conceptual in nature. The level of analysis suggested would be more appropriate during implementation when site specific design details are available.
   - The rationale for considering, but dismissing air quality as an impact topic is provided in *Chapter 1,* page 33.
   - Opportunities for physical activity are addressed under the description of each zone in *Chapter2*, under the header "*Appropriate Kinds of Activities or Facilities"* as well as summarized in Tables 2 and 3.
   - Due to the urban nature of the park, the exposure to traffic injury would be similar under each alternative.

Comments	Responses
Because physical activity is positively impacted by increased access and connectivity it would be desirable to connect trails along the river. It has been noted that the NPS does not own all of the land within the authorized recreation area and that it is unlikely to receive funding for the acquisition of all of these properties. Therefore the management plan should establish policies that encourage the development of a connected trail system along the river through collaboration with appropriate governments and land owners. The NPS should request notice when land within an identified buffer of its authorized boundary is to be subdivided and be given the opportunity to review and comment on the proposed plans prior to their approval by local governments. NPS comments could address opportunities to create a connected trail along the river and expansion of the local trail network. Because street frontage greatly increases the exposure and natural surveillance of public space, adjacent developments should be encouraged to create street frontage along their boundaries with the recreation area. Local governments should be alerted to the desirability of such opportunities and be asked to coordinate the review of projects with NPS staff.	4. The National Park Service will coordinate with other trail planning entities including local city, counties and state agencies and other non-government organizations on a case by case basis. The park will embrace partnership opportunities that will help accomplish the National Park Service mission provided that personnel and funding requirements do not make it impractical for the National Park Service to participate and that the partnership activity would not (1) violate legal ethical standards, (2) otherwise reflect adversely on the National Park Service mission and image, or (3) imply or indicate an unwillingness by the Service to perform an inherently governmental function (NPS 2006f). 5. The National Park Service will coordinate and comment where possible regarding projects that may influence the park. However, the National Park Service is only responsible for park owned land.
To promote pedestrian/bicycle travel to the park, we suggest that pedestrian/bicycle park entrances be prominently marked with signage, paving, fencing, and plant materials. The management plan should note the need for the prominent identification of pedestrian and bicycle entrances. Urban outdoor recreation areas can provide many opportunities for physical activity and enjoyment of the outdoors, both of which are beneficial to the public's health. These benefits and goals should be articulated in the plan. The local Departments of Health should be asked to review and comment on the public health impact of specific projects as they are identified. Additional links to data and resources you might find helpful can be found at: www.cdc.gov/healthyplaces	6. Site specific details regarding types and location of signage will be developed in the future during implementation. 7. The National Park Service concurs that the park provides benefits to public health under all proposed alternatives. See response number 1. 8. The park will continue to maintain the Centers for Disease Control and Prevention on the mailing list regarding future projects.
Thank you for the opportunity to comment on this management plan/environmental impact statement. Sincerely yours, Andrew L. Dannenberg, MD, MPH Associate Director for Science Division of Emergency and Environmental Health Services National Center for Environmental Health Centers for Disease Control and Prevention 4770 Buford Highway, MS-F60 Atlanta, GA 30341 DM	

Comments	Responses

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

December 1, 2008

Daniel R. Brown, Superintendent
Chattahoochee River National Recreation Area
1978 Island Ford Parkway
Atlanta, GA 30350-3400

SUBJECT: Supplemental Draft General Management Plan/Environmental Impact Statement for the Chattahoochee River National Recreation Area in Atlanta, Georgia; CEQ Number 20080364

Dear Mr. Brown:

The U.S. Environmental Protection Agency (EPA) has reviewed the referenced Supplemental Draft General Management Plan/Environmental Impact Statement (EIS) in accordance with its responsibilities under Section 309 of the Clean Air Act and Section 102(2)(C) of the National Environmental Policy Act. The purpose of this general management plan and Supplemental Draft EIS is to present a plan for managing the Chattahoochee River National Recreation Area (CRNRA) in Atlanta, Georgia, for the next 15 to 20 years. The National Park Service (NPS) is the lead federal agency for the proposed action.

General management plans represent the broadest level of planning conducted by the NPS and are intended to provide overall guidance for making informed decisions about future conditions in national parks. The NPS released a Draft EIS in 2004 that assessed the potential environmental impacts of four alternatives (A, B, C, and D) for managing the CRNRA. Based upon feedback received regarding these alternatives, additional meetings were conducted and two new alternatives (E and F) were developed and analyzed. The Supplemental Draft EIS assesses the environmental impacts of these two new alternatives in terms of levels of service for visitor interpretation and education in the CRNRA, suitable locations for administration and visitor facilities, and management of the CRNRA to allow for preservation of natural and cultural resources. Alternative F is identified as the preferred alternative and would provide more opportunities for access to the Chattahoochee River, facilities development, and an increased diversity of experience, as compared to the other alternatives.

EPA appreciates that the NPS developed a Supplemental Draft EIS and new alternatives to respond to public criticism of the original Draft EIS. The new alternatives represent combinations of the existing alternatives along with new zone types and management prescriptions. Alternative F provides opportunities for the NPS to expand use to local visitors and increase connectivity to neighboring communities through trail linkages, partnering, and expanded interpretive, education and outreach activities. Alternative F would also have a greater relative amount of land disturbing activity, as compared to the other alternatives, due to an increase in "hardened" types of access (e.g., boat ramps, parking areas, and paved trails) and

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Comments	Responses
development of support facilities. A number of mitigation measures are proposed in the Supplemental Draft EIS to avoid or minimize potentially adverse impacts from implementation of the new management plan and to ensure that the park's natural and cultural resources are protected and preserved for future visitors. EPA supports inclusion of these mitigation measures as part of the new general management plan for CRNRA, particularly the commitment to develop a resource stewardship strategy, fisheries management plan, and instream flow studies. EPA recommends that these programs include significant monitoring activities to ensure that the increase in hardened access areas and likely subsequent increase in recreational and educational usage of the park do not negatively impact natural and cultural resources. 1. In addition, EPA recommends inclusion of two specific outreach items related to water quality in the resource stewardship strategy: 1) the bacteria monitoring program, BacteriALERT, that was described in the Supplemental Draft EIS; and 2) publication and awareness of the various fish consumption advisories that currently exist throughout the CRNRA. It is unclear from the Supplemental Draft EIS if the BacteriALERT program will be continued under the new management plan. Both of these programs represent additional partnership opportunities with public and private organizations, such as the Georgia Environmental Protection Division, Georgia Conservancy, and Upper Chattahoochee Riverkeeper, and could be included in an overall water quality improvement and educational awareness strategy. In particular, these items will be especially important as new facilities are developed or in areas that are currently not meeting their designated uses (e.g., below Morgan Falls dam). We rate this document LO (Lack of Objections). EPA lacks objections to the proposed project and believes that the Supplemental Draft EIS provided adequate information on the environmental impacts. All mitigation measures and monitoring programs, as described in the Supplemental Draft EIS and including the above recommendations, should be fully implemented. We appreciate the opportunity to review the proposed action. Please contact Ben West of my staff at (404) 562-9643 if you have any questions or want to discuss our comments further. Sincerely, Heinz J. Mueller, Chief NEPA Program Office Office of Policy and Management 2	1. The National Park Service recognizes the benefits of cooperative conservation (in accordance with Executive Order 13352, Facilitation of Cooperative Conservation) as well as the significant role partners play throughout the national park system. Success of the existing and/or increased partner activities is linked to the willingness of partners to participate, the capabilities of partners to team on projects or provide services, and the potential for partners to provide support funding (see also *Partnering* section of *Chapter 2*). the National Park Service will embrace partnership opportunities that will help accomplish the National Park Service mission provided that personnel and funding requirements do not make it impractical for the Service to participate.

Comments	Responses

Noel Holcomb, Commissioner
Dan Forster, Director

Georgia Department of Natural Resources
Wildlife Resources Division
2070 U.S. Highway 278, S.E., Social Circle, Georgia 30025
(770) 918-6400

February 27, 2009

Mr. Dan Brown
Superintendent
Chattahoochee River National Recreation Area
1978 Island Ford Parkway
Atlanta, Georgia 30350

Dear Mr. Brown:

Thank you for the opportunity to work cooperatively on the Chattahoochee River National Recreation Area's General Management Plan. We support Alternative F as the preferred alternative. Alternative F provides more opportunities for improved access and facilities, and we feel this is the best course because of the park's urban setting. Improved access and facilities will promote recreational use to a broader segment of the public, including the elderly and physically challenged.

I would like to thank you for asking the Georgia Department of Natural Resources to serve as a partner in the General Management Plan process and to help address angler and boater issues. I am pleased with our agencies close working relationship. This relationship benefits both the resources and the public.

Sincerely,

Dan Forster

DF:pw

LIST OF RECIPIENTS

A summary table of the list of recipients is provided in Appendix H.

LIST OF PREPARERS

Supplemental Draft and Final	Draft
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