

**DRAFT
ENVIRONMENTAL ASSESSMENT
YMCA CAMP HIGH HARBOUR AT LAKE ALLATOONA MASTER PLAN
BARTOW COUNTY, GEORGIA**

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October 2014

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Draft
Environmental Assessment
YMCA Camp High Harbour at Lake Allatoona Master Plan
Bartow County, Georgia

1. INTRODUCTION:

- a) General: This Environmental Assessment (EA) was prepared utilizing a systematic, interdisciplinary approach integrating the natural and social sciences and the design arts with planning and decision-making. The proposed action and its alternatives are evaluated in multiple contexts for short-term and long-term effects and for adverse and beneficial effects. This EA indicates the effects on the human environment that are well known and do not involve unique or unknown risks, It is not anticipated that this is a precedent-setting action, nor does it represent a decision in principle about any future consideration. This EA follows the standards set forth in the U. S. Army Corps of Engineers (USACE) Regulation ER 200-2-2, "Procedures for Implementing NEPA."

The project site was originally leased from the Mobile District of USACE in 1953 with the purpose of serving as a recreational facility for military families. The site has been developed over the years with numerous improvements to include a boat ramp and docks, fishing pier, floating piers, trails, administrative buildings, rental cabins with utilities, undeveloped campsites, tennis courts, volleyball court, swimming beach area, bathhouses, snack bar, pavilions, and parking facilities. The USACE prepared a Master Plan in 1994, which outlined future development of the site to include duplex cabins and a conference center (dining hall).

The Young Men's Christian Association (YMCA) acquired the lease from USACE on October 1, 2010, effective for 20 years, and has continued to use the site as a recreational facility. Since 2010, the YMCA has made minor repairs and modifications, such as program area enhancements that were all approved at the local level to include the archery range, nature trails, re-roofing of buildings, and movement of fishing piers. In 2011, the YMCA constructed the new dining hall (labeled as conference center on the approved 1994 approved Master Plan). Also in 2011, the YMCA hosted camp at Lake Allatoona serving 1,000 campers over the course of the summer. Another main addition to the site was performed in 2012 when 6-inch water lines replaced the existing lines that were not up to code throughout the entire 85 acres of land. The current proposed Master Plan is the first attempt by the YMCA to suggest major changes to the site.

- b) Location: Camp High Harbour is located on the western shore of Lake Allatoona, a flood control and hydropower production reservoir on the Etowah River in northwest Georgia (Figure 1, Appendix A). Camp High Harbour is located in Bartow County, approximately 40 miles north of Atlanta, and can be reached from Interstate 75 (I-75) or State Route (SR) 41. The site is located in the Acworth, Georgia quadrangle on a U.S. Geological Survey (USGS) 7.5-minute topographic map (Figure 2, Appendix A) at a latitude (north) of 34.0990000 and longitude (west) of 84.7152000.

- c) Proposed Action: Currently, the park is partially developed as described in the approved 1994 Master Plan. The Proposed Action is the rehabilitation of the YMCA day and resident camp facility (Camp High Harbour) on leased land from USACE, operated by the YMCA of Metropolitan Atlanta, Inc. Refer to Figure 3 in Appendix A for an illustration of the proposed Master Plan. The Proposed Action is defined further under Section 3 of this Environmental Assessment.

- d) Purpose and Need for the Proposed Action: YMCA Camp High Harbour at Lake Allatoona (project site) serves the public by offering innovative and creative outdoor experiences to youth, schools, families, and community organizations. The primary use of the camp would continue to be as a summer residential camp. Secondly, the camp would continue to serve as a retreat center for schools, churches, families, and veterans offering educational and recreational programming during the week and on weekends. Camp High Harbour is currently in its fourth year of operation, serving 1,500 residential campers and 1,000 day campers during the summer. The site is open year round to host retreat groups on weekends and during the week. Lake Allatoona has a variety of uses, including flood control, navigation control for rivers, water quality and supply, recreation, and maintenance of fish and wildlife populations.

The 2014 Master Plan for the YMCA Camp High Harbour facilities consists of physical improvements such as new structures and buildings, to enhance the overall desirability of the site, to increase its capacity to accommodate peak use and to accommodate additional programs. The proposed Master Plan would provide additional program areas for all campers such as for active recreation provided for in the new ropes course and for personal enrichment and development in the assembly areas, provide additional camper accommodation to fulfill demand, and provide accommodation for veterans and their families.

- e) Authority: Section 4 of the Flood Control Act of 1944 authorized the Chief of Engineers "... to construct, maintain, and operate public parks and recreational facilities in reservoir areas under the control of the Secretary of the Army, and to permit the construction, maintenance, and operation of such facilities." Additional authorizations for development of public recreation facilities at power, flood control, and navigation projects are included in Section 209 of the Flood Control act of 1954, Section 207 of the Flood Control act of 1962, and by the Land and Water Conservation Fund Act of 1965, as amended. The 1954 Act added the authority to grant leases and well as licenses to Federal, state or local governmental agencies, where appropriate, to facilitate the construction of substantial improvements.

2. ENVIRONMENTAL SETTING WITHOUT THE PROJECT:

- a) General Environmental Setting: Topography of the site is varied and includes flat areas along the shoreline to steep slopes along ridges. The site has four ridges which extend into Lake Allatoona forming small coves. Elevation at the site ranges from 841 to 970 feet above mean sea level (AMSL). Land surrounding the site is characterized by low-density recreational development and rural residences. Camp High Harbour is located within the Etowah River Watershed, Hydrologic Unit Code (HUC) 03150104.

The site is located on Lake Allatoona approximately 30 miles north of Atlanta, Georgia. Lake Allatoona an impoundment of the Etowah River created in 1950, and serves primarily as a flood control storage reservoir. The total surface area of the lake is approximately 11,860 acres (Hakala, 2014). The water levels at the lake vary, but at full flood control, the level is about 840 feet AMSL while the minimum pool level is 800 AMSL (USACE, 1979; Hakala, 2014). The pool level remains relatively consistent during the summer months, but is reduced an average of 20 feet every autumn in anticipation of the storage necessary for winter and spring rains (USACE, 1979).

The project site is largely developed and maintained with planted grasses and various ornamental shrubs. Undeveloped portions of the project site consists primarily of mixed hardwood and mixed pine hardwood upland forests. There are remnants of these forested habitats within the developed portions of the project site. Specific vegetation observed at the site is described below under Section b.3.

Soil map units at the Camp High Harbour site consist of non-hydric soils including: Fruithurst-Braswell complex, 6-15 percent slopes (FrD); Fruithurst-Tallapoosa complex, 15-25 percent slopes (FrE); Pacolet sandy loam, 10-15 percent slope, moderately eroded (PaD2); Pacolet sandy loam, 6-10 percent slopes, moderately eroded (PaC2); Rion sandy loam, 15-25 percent slopes (RnE); and Tallapooa-Fruithurst complex, 25-60% slope (TaF) (Figure 4, Appendix A). The PaC2 soil map unit is considered a U.S. Department of Agriculture soil of statewide significance. For these soils, the depth to bedrock varies from 6 to 40 feet and the seasonal high water table is more than 10 feet below the surface. These soils are typically found on steep slopes. The soils are well drained and relatively stable, but due to the steep slopes, erosion of these soils is likely when vegetation cover is removed.

b) Significant Resource Description:

1. Waters of the U.S. including Wetlands:

Prior to the site visit, which was conducted on May 15, 2014, an office review was conducted to develop a list of potential ecological resources occurring within the study area. The approximate extent of wetlands and other U.S. waters was evaluated by consulting USGS digital 7.5-minute topographic maps and U.S. Fish and Wildlife Service (USFWS) National Wetland Inventory (NWI) maps of the study area. U.S. Department of Agriculture-National Resources Conservation Service (USDA-NRCS) maps were consulted to examine soils within the study area for areas containing hydric soils. National Agricultural Imagery Program (NAIP) 2009 aerial photography was also consulted to review the habitat and land use within the study area.

Jurisdictional Waters of the U.S. were evaluated using the Routine On-Site Determination Method as defined in the USACE Wetland Delineation Manual (Environmental Laboratory, 1987) and the Eastern Mountains and Piedmont Region regional supplement (USACE, 2012). These techniques use a multi-parameter approach, which requires positive evidence of three criteria: hydrophytic vegetation, hydric soils, and wetland hydrology.

The USFWS NWI map for the Acworth, Georgia 7.5-minute quadrangle indicates no wetlands on the project site (Figure 6, Appendix A). A site reconnaissance conducted on May 15, 2014, confirmed the absence of wetlands on the project site. However, a total of six streams were delineated on the site including three perennial streams, two intermittent streams, and one ephemeral channel (Figure 5, Appendix A). Intermittent stream 1 (IS1) and IS3 begin just north of the gate entrance on the east and west sides of the roadway, respectively. Both streams begin from 18-inch corrugated metal pipes which extend from the north beyond the entrance to the project site. The bankful channel width and depth of IS1 varies and is approximately 3 to 6 feet wide and 1 to 3 feet deep. Stream substrate consists of bed rock, cobble, and gravel. Water was flowing in IS1 and IS3 during the site visit; there was a rain event within the past 24 hours of the site visit. Wetted width of IS1 was 8 inches to 3 feet and wetted depth was 1 to 4 inches. IS3 had a bankful width and depth of 3 to 6 feet wide and 6 inches to 4 feet deep. Wetted width and depth of IS3 was 1 to 3 feet wide and 0.5 to 3 inches deep. IS3 had the same substrate composition as IS1. IS1 showed evidence of scour with exposed roots and bedrock along the channel. Both IS1 and IS3 flow downslope toward Lake Allatoona. IS1 flows directly to Perennial Stream 2 (PS2) about 100 feet downstream. IS3 flows to a pipe, which conveys the flow to the west under the roadway to PS2.

PS2 varies in width and depth, and is approximately 2 to 3 feet wide and up to 6 inches deep. The stream substrate of PS2 consists of cobble, gravel, and silt. Small, unidentified fish and frogs were observed within the stream. PS2 flows south where it drains to Lake Allatoona.

Ephemeral channel 4 (EC4) begins at the northeast end of the multi-purpose field (item #3 on Figure 3, Appendix A) and travels southwest toward Lake Allatoona. The bankful width and depth vary along the channel, and are 1 to 2 feet wide and 6 inches to 4 feet deep. There was no flowing water within EC4 during the site visit; however, there were small pools of standing water. Evidence of flow in EC4 consisted of wrack lines. EC4 contained some rooted vegetation, and a substrate consisting of silt and rock. EC4 flows through an 18-inch pipe under the roadway before draining directly to Lake Allatoona.

PS5 flows through the central portion of the project site from the north and extends south toward Lake Allatoona. The bankful width and depth vary along this stream, and are up to 6 feet wide and 1 to 4 feet deep. PS5 contained flowing water during the site visit. The wetted width and depth were 2 to 4 feet wide and 1 to 3 inches deep. Stream substrate consists of sand, sediment, gravel, and cobble. PS5 flows through a 26-inch concrete pipe under the roadway at the north end of the site, and through another 36-inch concrete pipe under a dirt road toward the south end of the site.

PS6 flows south toward Lake Allatoona along the eastern project site boundary. The bankful width and depth vary along the stream, and are 4 to 12 feet wide and 1 to 3 feet deep. PS6 contained flowing water during the site visit. Wetted width and depth varied and were 2 to 6 feet wide and 1 to 3 inches deep. Stream substrate consists of

sand, sediments, and cobble. The stream banks were eroded and incised in places and had exposed roots.

The perennial streams within the project site are typical of small Piedmont Region streams and are consistent with the upper reaches of tributary streams (headwater streams). These streams within the project site are medium- to low-quality, with substrates dominated by sediment, sand, gravel, and cobble. Base flow during the site visit was weak to moderate and may not provide adequate flow throughout the year to provide aquatic habitat. Aquatic habitat provided by the perennial streams in the project site includes lotic environments characterized by slow to moderate flowing water moving over coarse substrate. Cobbles, bank roots, and small amounts of woody debris, particularly in PS6, create crevices and eddies that offer protection from the stream current. Leaf litter is limited largely to stream margins and small pools, but provides additional habitat to benthic invertebrates.

Based on the quality of the perennial streams within the project site, aquatic biota likely to inhabit this resource may be restricted to species tolerant of impaired water quality conditions, and is unlikely to include sensitive species. The species diversity tends to be lower in headwater streams, with benthic macroinvertebrates being a very important component of the community. Fish assemblage is typically lower than in small river systems and mussels are often absent from headwater streams.

2. Fishery Resources:

Fisheries resources in Lake Allatoona include four species of predatory game fish, five species of non-predatory game fish, and at least a dozen species of food and forage fish (Hakala, 2014; USACE, 1979). The principal game fish species include largemouth bass (*Micropterus salmoides*), bluegill (*Lepomis macrochirus*), Alabama bass (*Micropterus henshalli*), striped bass (*Morone saxatilis*), hybrid striped bass (*Morone saxatilis X chrysops*), channel catfish (*Ictalurus punctatus*), and flathead catfish (*Pylodictis olivaris*) (Hakala, 2014). Other species include spotted bass (*Micropterus punctatus*), white bass (*Morone chrysops*), black crappie (*Pomoxis nigromaculatus*), and various sunfish (*Lepomis* spp.) (USACE, 1979).

The Georgia Department of Natural Resources Wildlife Resources Division (GADNR) initiated a long-term effort in 2002 to restore lake sturgeon (*Acipenser fulvescens*) to the Coosa River system in Northwest Georgia. Reasons for stocking lake sturgeon are to reestablish a native sport fish to Georgia waters, and to restore a species that addresses the conservation of Georgia's rare species. During sampling in the Coosa River system, over 350 lake sturgeon from the 2002 through 2004 releases were captured, measured, and released. In late 2008, GADNR began stocking lake sturgeon in Lake Allatoona. Including the first stocking in 2002, GADNR has released over 85,000 fingerlings as of December 2008. Lake sturgeon of over 40 inches long and weighing up to 15 pounds have been reported in 2009 by anglers who caught and released sturgeon. Based on angler reports, the fish have moved further downstream in the Coosa system including Neely Henry and Logan Martin reservoirs in Alabama (GADNR, 2014a).

Fish population studies in 1965 and 1968 indicated a density of up to 75 pounds per acre (USACE, 1974). In 1972, 40,000 Florida largemouth bass (*Micropterus salmoides floridamus*) and 70,000 regular largemouth bass were stocked in Lake Allatoona. In 1973, 25,000 striped bass (*Morone saxatilis*) were stocked.

Georgia state fishing regulations are in effect in Lake Allatoona. Fishing is one of the major recreational attractions of Lake Allatoona. The lake supported about one million fishermen days during 1973, the most recent data available, resulting in 0.4 million pounds of game fish being caught (USACE, 1979).

3. Habitat and Wildlife Resources:

The project site consists primarily of mixed hardwood and mixed pine hardwood upland forests. Dominant vegetation observed during the site visit consisted of American sycamore (*Platanus occidentalis*), red maple (*Acer rubrum*), river birch (*Betula nigra*), sourwood (*Oxydendrum arboretum*), sweetgum (*Liquidambar styraciflua*), northern red oak (*Quercus rubra*), white oak (*Quercus alba*), tulip tree (*Liriodendron tulipifera*), water oak (*Quercus nigra*), turkey oak (*Quercus cerris*), loblolly pine (*Pinus taeda*), big-leaf magnolia (*Magnolia macrophylla*), shagbark hickory (*Carya ovata*), doghobble (*Leucothoe axillaris*), poison ivy (*Toxicodendron radicans*), muscadine (*Vitis rotundifolia*), and common greenbrier (*Smilax rotundifolia*). Invasive species observed include mimosa (*Albizia julibrissin*), tree-of-heaven (*Ailanthus altissima*), English ivy (*Hedera helix*), Japanese honeysuckle (*Lonicera japonica*), and kudzu (*Pueraria montana* var. *lobata*).

Due to the developed and maintained nature of the project site, the majority of the site is of low value to local wildlife. Further, development of adjacent land areas has reduced the amount of contiguous habitat available for animals requiring large habitat areas. Thus, the diversity of game and non-game wildlife is likely low within the project site. It is expected that the project site and surrounding areas are inhabited by a variety of wildlife including whitetail deer (*Odocoileus virginianus*), gray squirrel (*Sciurus carolinensis*), cottontail rabbit (*Sylvilagus floridanus*), raccoon (*Procyon lotor*), chipmunk (*Tamias striatus*), Eastern wild turkey (*Meleagris gallopavo silvestris*), and opossum (*Didelphis virginianus*), as well as other commonly encountered animals that inhabit the area of Lake Allatoona, such as the Canada goose (*Branta canadensis*).

4. Threatened and Endangered Species:

A current list of federally protected plants and animals in Bartow County was obtained from the USFWS Information, Planning, and Conservation System (IPaC) (USFWS, 2014a) and GADNR (2014b) websites (Table 1). A request for early coordination with USFWS was also submitted on May 8, 2014. A response was received on May 20, 2014, in which the USFWS indicated that the Proposed Action is not expected to significantly impact fish and wildlife resources under their jurisdiction. Further, the USFWS did not indicate records of any known listed species within the project area (Appendix B).

According to the review of the GADNR and USFWS online databases, 11 federally protected aquatic species potentially occur within the study area. These species include Alabama moccasinshell (*Medionidus acutissimus*), Coosa moccasinshell (*Medionidus parvulus*), finelined pocketbook (*Lampsilis altilis*), cylindrical lioplax (*Lioplax cyclostomaformis*), southern clubshell (*Pleurobema decisum*), southern pigtoe (*Pleurobema georgianum*), triangular kidneyshell (*Ptychobranthus greenii*), amber darter (*Percina antesella*), Cherokee darter (*Etheostoma scotti*), Etowah darter (*Etheostoma etowahae*), and interrupted rocksnail (*Leptoxis foremani*). However, the small streams and lake margins within the study area do not provide suitable habitat for these species. The project site streams are too small, and do not appear to contain sufficient year-around flows to support listed aquatic species.

Further, according to the review of the GADNR and USFWS online databases, seven federally protected wildlife and plant species potentially occur within the study area including the Indiana bat (*Myotis sodalis*), gray bat (*Myotis grisescens*), northern long-eared bat (*Myotis septentrionalis*), monkeyfaced orchid (*Platanthera integrilabia*), large-flowered skullcap (*Scutellaria montana*), Georgia aster (*Symphotrichum georgianum*), and Tennessee yellow-eyed grass (*Xyris tennesseensis*). During the site visit conducted on May 15, 2014, habitats within the project site were assessed to determine suitability for listed wildlife and plant species. No federally listed species were observed during the survey, and none have been documented as occurring within the project site (USACE, 1979; Appendix B).

The project site contains suitable foraging and roosting habitat (e.g. forested areas, especially along stream and lake margins) for the listed bat species; however, there are no caves or other suitable hibernacula within the project site that may support roosting/breeding gray bats. Gray bats roost, breed, rear young, and hibernate in caves year round. They migrate between summer and winter caves and will use transient or stopover caves along the way. Gray bats feed primarily on insects flying over rivers and lakes; aquatic insects make up most of their diet. The project site does contain potential summer roosting and foraging habitat for the Indiana bat and northern long-eared bat. Summer roost or maternity colonies of these species generally are found under the loose bark of dead or dying trees, but roosts also have been found in tree cavities (Britzke et al., 2003).

The project site does not contain suitable habitat for the monkeyfaced orchid or Tennessee yellow-eyed grass as these plants require wet habitats such as spring runs, seeps, wet meadows, wet swales, and red maple-blackgum swamps along damp stream margins. Typical habitat for the large-flowered skullcap, a perennial herb, consists of moist hardwood and hardwood-pine forests with few shrubs. However, known occurrences are concentrated on Lookout and Signal Mountains in Tennessee and in Floyd County, Georgia. Although the project site contains potentially suitable habitat for this species, due to the known range for the species and the high level of development/disturbance on the project site, the likelihood of presence of this species is low. The Georgia aster is a perennial herb that commonly occurs in dry, open areas in Georgia, Alabama, North Carolina, and South Carolina, and historically from

Florida. It is often found in disturbed areas such as right-of-ways. The site visit was not conducted during the flowering period for this species, thus the presence or absence of this species on the project site has not been confirmed. The study area contains dry, open habitats capable of supporting Georgia aster; however, the majority of the project site has been developed/disturbed, thus, the likelihood of presence of this species is low.

“Critical habitat,” as defined in the Endangered Species Act (ESA) of 1973, is a term for habitat given special protection for the benefit of a listed species. Under Section 7(a) of the ESA, federal agencies must ensure that any action they authorize, fund or carry out is not likely to result in destruction or adverse modification of formally designated critical habitat. Critical habitat is formally designated by the USFWS in the Code of Federal Regulations, if prudent and determinable. The USFWS Critical Habitat Portal indicates that no critical habitat for federally threatened and endangered species occurs within Bartow County (USFWS, 2014b). The nearest designated critical habitat is located in Floyd County approximately 27 miles northwest of the project site for interrupted rocksnail, finelined pocketbook, Coosa moccasinshell, Alabama moccasinshell, upland combshell (*Epioblasma metastriata*), triangular kidenyshell, southern pigtoe, southern clubshell, ovate clubshell (*Pleurbema perovatum*), and southern acornshell (*Epioblasma othcaloogensis*).

Table 1. Federally Protected Species in Bartow County, Georgia

Scientific Name	Common Name	Federal Status	State Status	Potential Habitat Available on Project Site?
Animals				
<i>Etheostoma etowahae</i>	Etowah darter	E	E	N
<i>Etheostoma scotti</i>	Cherokee darter	T	T	N
<i>Hamiota altilis</i>	Finelined pocketbook	T	T	N
<i>Leptoxis foremani</i>	Interrupted rocksnail	E	E	N
<i>Lioplax cyclostomaformis</i>	Cylindrical lioplax	E	E	N
<i>Medionidus acutissimus</i>	Alabama moccasinshell	T	T	N
<i>Medionidus parvulus</i>	Coosa moccasinshell	E	E	N
<i>Myotis grisescens</i>	Gray bat	E	E	Y (foraging)
<i>Myotis sodalis</i>	Indiana bat	E	E	Y (roosting/foraging)
<i>Myotis septentrionalis</i>	Northern long-eared bat	PE	--	Y (roosting/foraging)
<i>Percina antesella</i>	Amber darter	E	E	N
<i>Pleurobema decisum</i>	Southern clubshell	E	E	N
<i>Pleurobema georgianum</i>	Southern pigtoe	E	E	N
<i>Ptychobranchnus greenii</i>	Triangular kidneyshell	E	E	N
Plants				
<i>Platanthera integrilabia</i>	Monkeyface orchid	C	T	N
<i>Scutellaria montana</i>	Large-flowered skullcap	T	T	Y
<i>Symphotrichum georgianum</i>	Georgia aster	C	T	Y
<i>Xyris tennesseensis</i>	Tennessee yellow-eyed grass	E	E	N

Notes: Sources: (GADNR, 2014b) and (USFWS, 2014a); E = Endangered; PE: Proposed Endangered; T = Threatened; C = Candidate

5. Cultural Resources:

From October 1978 through February 1979, the Coastal Zone Resources Division of Ocean Data Systems, Inc. (1979) conducted a cultural resources reconnaissance of specified areas of Fort McPherson, Fort Gillem, and what is now known as the YMCA Camp High Harbour property. This work, conducted under Contract No. DACA21-78-C-0009 with the USACE, Savannah District, included a literature review, contacts with agencies holding files of pertinent information, and field reconnaissance. The purpose of the field reconnaissance was to locate, identify, and inventory cultural resources at specific undeveloped sections of the property. The categories of cultural resources considered included prehistoric archeological sites, historical archeological sites related to pre-military use of the property, historical archeological sites related to the military, and extant structures. No such cultural resources were identified on the YMCA Camp High Harbour property.

An online search of the National Register of Historic Places (<http://www.nationalregisterofhistoricplaces.com/ga/state.html>) conducted on July 24, 2014, revealed that there are no reported historical sites in the project footprint.

A review of the Georgia State Site Files reveals one significant archaeological site (9Br567) within the Area of Potential Effect (APE), yet outside of the project construction and view-shed limits. Additionally, recent surveys, (Fedoroff, 2013) have identified remnants of the Federal Block House related to the Allatoona Pass Civil War Battle near the project area yet outside the APE. A review of the updated Integrated Cultural Resources Management Plan (USACE, 2014) by the Mobile District Archaeologist has determined that no intact cultural resources likely remain in the project footprint which were confirmed by the District Archaeologist 2014 site visit (Personal Communication Fedoroff, 2014).

6. Navigation:

The project site does not contain navigable waters. However, Lake Allatoona, which is located adjacent to the project site, offers many recreational opportunities. There are eight privately operated marinas and numerous boat launching ramps located in public recreation areas around the lake. Various types of personal watercraft navigate the lake including jet skis, wave runners, small bass boats, pontoon boats, and houseboats.

7. Recreation:

The project site was originally leased from the Mobile District of USACE in 1953 with the purpose of serving as a recreational facility for military families. The site has been developed over the years with numerous improvements to include a boat ramp and docks, fishing pier, floating piers, trails, administrative buildings, rental cabins with utilities, undeveloped

campsites, tennis courts, volleyball court, swimming beach area, bathhouses, snack bar, pavilions, and parking facilities. The camp continues to be used as a summer residential camp and retreat center for schools, churches, families, and veterans offering educational and recreational programming during the week and on weekends. Camp High Harbour is currently in its fourth year of operation, serving 1,500 residential campers and 1,000 day campers during the summer. The site is open year round to host retreat groups on weekends and during the week.

Lake Allatoona borders the south side of the project site. This lake is leased or otherwise made available to various federal, state, and local governments for recreational or forest and wildlife management uses.

8. Aesthetics:

The National Environmental Policy Act of 1969 as amended (NEPA) establishes that the federal government use all practicable means to ensure all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings [42 U.S.C. 4331(b) (2)].

The project site is currently a moderately developed recreational facility on a man-made lake. The degree to which such facilities provide aesthetic value is highly subjective and dependent upon personal judgment. Although to some persons, such highly engineered reservoirs provide a “natural” environment with high aesthetic appeal, others may view the development as highly impacted and destructive of the aesthetics of the previous river valley and viewscape. In general, the aesthetic appeal of the area is typical for semi-suburban areas, with the natural aesthetics having already suffered negative impacts in the past from the construction of the lake and its associated recreational uses, improvements at the project site, and surrounding residential development

There are no significant scenic resources within the project site such as the following examples: a tree that displays outstanding features of form or age; a landmark tree or a group of distinctive trees accented in a setting as a focus of attention; an unusual planting that has historical value; a unique, or massive rock formation; a historic building that is a rare example of its period, style, or design, or which has special architectural features and details of importance; a feature specifically identified in applicable planning documents as having special scenic value; a unique focus or a feature integrated with its surroundings or overlapping other scenic elements to form a panorama; or a vegetative or structural feature that has local, regional, or statewide importance. The YMCA of Metropolitan Atlanta, Inc. does not have established design element and architectural design guidelines for the Camp High Harbour project site; however, the project site does have viewpoints of Lake Allatoona, which provide for the overall scenic beauty of the site. A

visual impact assessment has not been prepared in support of the proposed action.

9. Air Quality:

On 30 November 1993, the U.S. Environmental Protection Agency (USEPA) published its final *General Conformity Rule* to implement Section 176(c) of the Clean Air Act (CAA) for geographic areas designated in CAA nonattainment areas and in those attainment areas subject to maintenance plans required by CAA Section 175(a) (final rule revision on April 5, 2010). The CAA General Conformity Rule applies to Federal actions. Bartow County, Georgia, in which the project site is located, is within the metropolitan area of Atlanta and is designated by the EPA as a “non-attainment” area for ozone and particulate matter levels. The non-attainment designation is based on results of air sampling and resulting degree to which national ambient air quality standards, as defined by the EPA, are not currently being met.

Both ozone and particulate matter are pollutants that originate primarily from internal combustion engines, especially those associated with automobiles and trucks, and secondarily from industrial sources. The project vicinity already experiences large volumes of automobile traffic due to nearby Interstate 75 (I-75), which would affect air quality at and near the project site. The project site contains recreational facilities and received little vehicle traffic, with the exception of YMCA day campers during the summer months.

10. Water Quality:

The unnamed streams within the project site are tributaries to Lake Allatoona. These streams are not listed on the Georgia Environmental Protection Division (GAEPD) approved 2012 Integrated 305(b)/303(d) List of Streams as not supporting their designated uses. However, portions of Lake Allatoona outside of the project site are included on the approved 2012 Integrated 305(b)/303(d) List of Lakes as not fully supporting designated uses (drinking water/recreation) including the Etowah River Arm in Cherokee County and the Little River Embayment in Cherokee County. The criterion violated for both areas is for chlorophyll a due to non-point pollution and urban runoff. A third portion of Lake Allatoona at the Lake Allatoona Arm in Cobb and Bartow counties has been under assessment for criteria violations. The water is being placed in Category 3 because the growing season average for chlorophyll a exceeded the criteria once in the last 5 years.

In general, water quality in the lake is potentially affected in numerous ways. Boating activities and operations are one such source. Illegal discharges from marine toilets can increase the fecal coliform counts in the lake, and sediment can be resuspended through boat operations and wakes, although resuspension is generally a localized condition. Also, refueling and boat operation can introduce hydrocarbons to the water and the introduction of metals and other toxic materials can occur through boat maintenance activities.

The project site is in compliance with all identified state and federal water pollution control requirements. The only point source discharge from the project site is a wastewater treatment facility, which is covered under National Pollutant Discharge Elimination System (NPDES) permit number GA0027456, which expires on March 31, 2019. This permit, issued by the GAEPD, allows discharge from the wastewater treatment facility to Lake Allatoona. The NPDES permit also set effluent water-quality limitations, monitoring requirements, and other conditions. The volume of flow to and from the wastewater treatment facility varies greatly throughout the year dependent upon area use. Extremely low flows to the facility occur during the winter months while higher flows to and from the facility occur during the summer months. In a letter to the GAEPD, dated January 15, 2014, The YMCA of Metropolitan Atlanta, Inc. indicated that flow from the facility to Lake Allatoona only occurs during the months of June and July. The facility tests once per month for the following parameters: biochemical oxygen demand (BOD), total suspended solids (TSS), pH, flow, and fecal coliform. The wastewater treatment facility uses an 8-inch service main that incorporates use of three ejector-type lift stations. Wastewater is pumped to the activated sludge wastewater treatment facility, which has the capability of being operated as a contact stabilization facility or an extended aeration facility. This flexibility enables the facility to accommodate the great fluctuations in flow caused by seasonal use of the area. The present capacity of the facility is 20,000 gallons per day, which is adequate for present needs.

Drinking water is provided by the Bartow County Water Department, located in Cartersville, Georgia.

11. Floodplain:

The majority of the project site is not located within the 100-year floodplain; however, portions of the lake margins within the project site and Lake Allatoona itself are within the 100-year floodplain (Figure 7, Appendix A).

12. Socioeconomic:

The following community data is based upon the most readily available data found on the U.S. Census Bureau website www.factfinder.census.gov. The populations of the City of Cartersville in 2013 were 19,714 in comparison to that of Bartow County, which was 101,273. The 2008 to 2012, 5-year estimated per capita income for the City of Cartersville was \$21,980 in comparison to the 2012, 1-year estimate for Bartow County, which was \$20,224.

The 2006 percentage of individuals below the poverty level in Bartow County was 13.7 percent compared to 12.5 percent for the City of Cartersville, and 15 percent for the State of Georgia (U.S. Department of Commerce, U.S. Census Bureau, 2014).

13. Prime and Unique Farmland:

According to the Farmland Protection Policy Act, a survey of the project area for prime and unique farmland soils is required. A site visit was conducted on May 15, 2014. No prime or unique farmland soil types are located within the project site, although the PaC2 soil map unit found on the site is considered a USDA-NRCS soil of statewide significance. None of the project site is currently used for agricultural purposes, and the majority of the site is developed and maintained. Thus, no coordination with the NRCS regarding farmland is required

14. Hazardous and Toxic Materials:

A hazardous materials report was compiled (Environmental Data Resources, Inc., 2014) and no evidence of hazardous and/or toxic material was found on the project site. Four underground storage tanks (USTs) have been documented for the project site. Three of these tanks have been removed, while one remains in use. The existing UST was installed on February 9, 1998, and new lines were installed in 2011. This fiberglass, double-walled UST (40-MG3) is used for storage of 87 grade gasoline and has a capacity of 2,500 gallons. The gasoline is used for re-fueling boats.

The next nearest UST is located 0.202 mile from the site at 609 Sandtown Road SE. Two leaking USTs have been documented at the project site. These cases were documented in 1997 and 1998 with a cleanup status of No Further Action documented. The next nearest leaking underground storage tank is approximately 0.25 mile from the site at an undisclosed location. Historically, the project site has not been used for storage or disposal of hazardous or toxic materials, thus, there is no reason to suspect that such materials currently exist on the site. Inspections of the UST at the project site are conducted yearly. The YMCA of Metropolitan Atlanta, Inc. uses a Veeder Root system to monitor flow, levels, and any issues that may arise, and have installed spill booms in the unlikely event of a leak.

15. Other Resources:

a. Noise: There is currently no significant source of noise at the project site. Occasional unquantified levels of noise result from automobile traffic in and around the site. Currently, the greatest source of noise comes from automobile traffic entering and exiting the site and not from activities within the project site itself. In addition, noise is muted by existing forest cover and by the distance between the project site and residential areas.

b. Environmental Justice: The primary objective of an environmental justice analysis is to ensure that vulnerable populations do not bear a disproportionately high and adverse share of human health or environmental effects from proposed federal actions. To address environmental justice concerns, President Clinton issued Executive Order (EO) 12898, *Federal Actions to Address Environmental Justice in Minority and Low-Income Populations*, on February 11, 1994, requiring each federal agency to “make

the achievement of environmental justice part of its mission by identifying and addressing disproportionately high and adverse human health and environmental effects on minority and low-income populations.” The EO and accompanying Presidential Memorandum direct federal agencies to identify and analyze the potential socioeconomic impacts of proposed actions in accordance with health and environmental laws and to identify alternatives that might mitigate these impacts. The project site is not considered an area of disproportionate numbers of minority or low income populations. The 2010 annual estimate of the resident population in Bartow County consists of the following: 88,192 white; 11,279 black/African American; 1,303 American Indian or Alaskan native; 1,053 Asian; and 153 native Hawaiian or other Pacific Islander.

c. Protection of Children: On 12 April 1991, the President issued EO 13045, *Protection of Children from Environmental Health Risks and Safety Risks*. The EO seeks to protect children from disproportionately incurring environmental health or safety risks that might arise as a result of USACE policies, programs, activities, and standards. Historically, children have often been present at Lake Allatoona as residents and visitors. Inherent in recreational facilities associated with water bodies are safety risks not present in non-water related areas. These include such risks as drowning and boating accidents.

3. DESCRIPTION OF RECOMMENDED ACTION (USACE Proposed Action):

The preferred alternative involves the construction and improvement of proposed facilities on the 2014 Master Plan for the YMCA Camp High Harbour on Lake Allatoona, including various indoor and outdoor structures to be utilized for educational and recreational purposes, maintained by the YMCA and enjoyed by the community. Refer to Figure 3 in Appendix A for an illustration of the Master Plan.

The Proposed Action includes multiple improvements including the following:

- Front entrance security gate;
- Open-sided pavilion;
- Sports court and pavilion;
- Open-sided pavilion;
- Open-sided amphitheater and adjacent bathroom;
- Chapel;
- Open-sided pavilion with bathroom;
- Storage barn;
- Dining hall measuring;
- Open-sided ropes course pavilion;
- Ropes course and climbing tower;
- Open-sided pavilion over existing concrete pad;

- Cabin duplexes; and
- Pervious staff parking lot with 70 spaces.

Sidewalks/walkways would be provided as the Master Plan is implemented. These construction "pathways" may be concrete or may take a more natural approach such as using pea gravel or wood chips. They pathways may also utilize a perimeter edge treatment such as treated wood rail ties or metal edging. Pathways would be provided only as needed to provide safe conditions for campers and provide some protection for the site from erosion caused by foot traffic.

All indoor facilities would be fully equipped with electrical and sewage systems and would be compliant with the Americans with Disabilities Act (ADA) of 1990.

All facilities would be constructed in compliance with the USACE Mobile District Regulation SAMDR 1110-1-3 and GADNR recommendations, which include construction outside a 100-foot buffer from the normal lake pool level to minimize erosion. More specifically, the Mobile District Regulation SAMDR 1110-1-3, requires the following:

“A vegetative buffer along the shoreline is required, except where penetration is approved for access purposes, to maintain the natural character of the shoreline and to provide visual screening. This buffer shall consist of existing native plant material or compatible non-native material as approved...The required buffer shall be 100 feet wide measured from normal pool summer contour.”

4. ENVIRONMENTAL IMPACT OF THE PROPOSED ACTION:

Environmental impacts of the proposed action are described for each of the following significant resource areas. No change in existing environmental conditions would be expected with the No Action Alternative. A summary of the environmental impacts associated with each alternative is shown in Table 2.

Table 2 – Summary of Project Impacts by Alternative

FACTORS	No Action	Proposed Action
1. Waters of the U.S. Including Wetlands	No effect	Negligible
2. Fishery Resources	No effect	No effect
3. Habitat and Wildlife Resources	No effect	Adverse-minor
4. Threatened and Endangered Species	No effect	MANLTAA
5. Cultural Resources	No effect	No effect
6. Navigation	No effect	No effect
7. Recreation	No effect	Beneficial-moderate
8. Aesthetics	Beneficial-minor	Adverse-minor
9. Air Quality	No effect	Negligible
10. Water Quality	No effect	Adverse-minor
11. Floodoplain	No effect	No effect
12. Socioeconomic	No effect	Beneficial-minor
13. Prime and Unique Farmlands	No effect	No effect
14. Hazardous and Toxic Materials	No effect	No effect
15. Other Traffic Noise	No effect No effect	Adverse-minor Adverse-minor
16. Cumulative Impacts	No effect	No effect
17. Environmental Justice	No effect	No effect
18. Protection of Children	No effect	No effect

MANLTAA = May Affect, Not Likely to Adversely Affect

a) Biological and Physical Impacts:

1. Waters of the U.S., Including Wetlands:

Because there are no wetlands on the project site, no impacts would occur. None of the proposed improvements, as show on the Master Plan (Figure 3, Appendix A), would impact the streams within the project site. The front entrance security gate and the open-sided pavilion at the multi-purpose sports field are the closest developments to project site streams. Potential indirect impacts to jurisdictional waters within the project site during construction would be minimized through implementation of hydrological control and standard soil erosion control measures. Avoidance and minimization measures implemented may include the following:

- Preservation of vegetation beyond the limits of construction where possible.
- Early revegetation of disturbed areas so as to hold soil movement to a minimum.
- The use of slope drains, detention/retention structures, surface, subsurface and cross drains, designed as appropriate or needed, so that discharge would occur in locations and in such a manner that surface and subsurface water quality would not be affected (the outlets may require aprons, bank protection, silt basins and energy dissipaters).
- Inclusion of construction features for the control of predicted erosion and water pollution in the plans; specifications and contract pay items.

- The prohibition of dumping of chemicals, fuels, lubricants, bitumens, raw sewage, other harmful waste into or alongside of streams or impoundments, or into natural or man-made channels leading thereto.
- Compliance with terms of the NPDES permit for construction activities to include preparation and submittal of project Notice of Intent (NOI) and Notice of Termination (NOT). The NPDES permit also requires preparation and implementation of an Erosion, Sedimentation, and Pollution Control Plan and a Comprehensive Monitoring Program. Best management practices (BMPs) outlined in the Erosion, Sedimentation, and Pollution Control Plan must be consistent with, and no less stringent than, practices set forth in the Manual for Erosion and Sedimentation Control in Georgia.

With avoidance of direct impacts to streams and implementation of avoidance and minimization measures for potential indirect impacts, the Proposed Action is expected to have negligible impacts on Waters of the U.S. within the project site.

2. Fishery Resources:

The Proposed Action would have no impact on fish habitat, spawning areas, or food sources in Lake Allatoona. There would be negligible associated impacts on water quality (see further below) that could impact fish populations. An increase in the number of sport fishermen resulting from the development of the project site is highly unlikely. The GADNR and USACE recommend that vegetation be left intact within 100 feet of any creeks and that machinery be kept out of Lake Allatoona during construction of the proposed facilities in order to protect aquatic habitat.

3. Habitat and Wildlife Resources:

The Proposed Action would result in low to moderate impacts to common wildlife species and their required habitats. In the short term, clearing and construction activities would disturb most common wildlife species such as deer, turkey, other birds, and small mammals. Most species such as these would likely leave the immediate area of construction, moving into nearby undeveloped habitat. Upland wildlife habitat would be lost as forested overstory, mid-story, and under-story vegetation would be permanently removed and replaced with structures. In the long term, species that readily adapt to human presence, such as deer, squirrels, raccoons, certain reptiles and amphibians, and non-game birds would return to the area.

Development of the surrounding non-Federal properties for residential subdivisions, has reduced suitable habitat for wide-ranging animal species in the vicinity of the project site. Species requiring large territories have been largely eliminated from developing suburban areas, such as the areas surrounding Lake Allatoona. Such impacts have already occurred and would likely continue to occur regardless of the alternative considered. Implementation of the Proposed Action would have little or no impact on such species because of such existing and ongoing habitat loss in the region.

4. Threatened and Endangered Species:

The project site streams are too small, and do not appear to contain sufficient year-around flows to support listed aquatic species. Thus, there would be no effect on the listed aquatic species identified for the project area. The Indiana bat, gray bat, northern long-eared bat, large-flowered skullcap, and Georgia aster are the only listed terrestrial species with potential suitable habitat found within the project site. These species were not observed during site visit conducted on May 15, 2014; however, intensive surveys were not conducted. The site visit conducted during the blooming period for large-flowered skullcap (May-June), but not during the blooming period for Georgia aster (September-November). In a stamped response signed by a representative of the USFWS, dated May 20, 2014, they stated that they concurred that species listed under the ESA would not be affected and no further coordination regarding threatened and endangered species would be required. A copy of this correspondence letter from USFWS is located in Appendix B. However, given the presence of potentially suitable habitat within the project site, the recommended biological determination for the Indiana bat, gray bat, northern long-eared bat, large-flowered skullcap, and Georgia aster would be may affect, not likely to adversely affect.

5. Cultural Resources:

A search of the National Register of Historical Places indicated that there were no historically significant resources known within the project site. Although significant cultural resources have been recently identified near the project area related to the Battle of Allatoona Pass, it is the determination of the Mobile District Archaeologist based on 2014 project site visits and the level of existing disturbance in the project area that no intact cultural resources remain in the APE (Personal Communication Fedoroff, 2014). Therefore, there would be no effects to cultural resources by the Proposed Action. However, an Inadvertent Discoveries Plan will be on file for the Proposed Action that will address any potential cultural resource issues as a result of inadvertent discovery of cultural resources during the implementation of this undertaking.

6. Navigation:

There would be no effect on navigation as navigable waters are not present on the project site. Further, the Proposed Action would have no effect on recreational navigation on the adjacent Lake Allatoona. Although the Proposed Action would provide increased recreational opportunities, no appreciable changes to recreational water craft use, such as canoes and other small boats, are anticipated that would contribute to congestion of personal water craft on Lake Allatoona. Further, no additions to boat ramps or docks are proposed.

7. Recreation:

Because the project site is currently used for recreation, impacts associated with any development are considered to be not significant. Any restrictions or limitations potentially imposed by a non-federal lessee, whether in areas allowed for access, time of access, or fees charged for access would likely be viewed as an

adverse impact by some users of the facility. However, the Proposed Action is a continuation of past recreational uses, and development of the facilities would likely be viewed as beneficial. The degree of perceived negative impacts on recreation would vary depending on the nature and scope of development implemented and the amount of fees charged to users. The 2014 Master Plan proposes to provide use of facilities at the project site which are similar to those that currently exist.

Generally, the Proposed Action would provide increased recreational opportunities when compared to the No Action alternative. Such benefits to recreation would allow a greater number of people to use the Camp High Harbour facilities. The benefits to recreation would stem from the developments proposed. Those benefits would outweigh the negatives previously discussed for the majority of potential users of the park. Therefore, the net impact to recreation is considered to be moderately beneficial for the Proposed Action.

8. Aesthetics:

Due to the currently existing human-modified nature of the project site and surrounding areas, the further construction of recreational facilities could be considered by some observers to have no significant impact on the aesthetic appeal of the area. The addition of the front gate would help to improve the aesthetics of the park entrance for non-users of the park facilities. The removal of noxious invasive plant species from the park, such as kudzu, combined with carefully planned landscaping could result in a minor benefit to aesthetics. Because most observers could consider the existing condition with the lake to have a positive aesthetic appeal, any modification of vegetation or construction of any facilities could be considered as having a negative impact. Therefore, the project is considered to have a minor adverse impact on aesthetics.

9. Air Quality:

Compared to the No Action alternative, the Proposed Action would have both short-term and long-term effects on emissions into the air as a result of exhaust from internal combustion engines and fugitive dust from construction activities. Construction of the Proposed Action would temporarily generate emissions from heavy machinery and equipment working on-site. In addition, during construction, fugitive dust emissions from ground-disturbing activities would occur. Uncontrolled fugitive dust emissions, including particulate matter less than 10 microns in diameter, would be temporary, localized, and occur in sparsely populated rural areas. Therefore, impacts of fugitive dust on air quality and the human environment should be short-term and minor. Therefore, the overall impact to air quality would be negligible due to construction of the Proposed Action.

After project construction, the use of automobiles and other vehicles, mostly by visitors traveling to and from the project site, would further contribute to emissions. With the limited development associated with the Proposed Action,

most traffic would be expected to be relatively local in nature and those further emissions would be minimal. Continuing growth and urbanization in the area of Lake Allatoona would result in increased cumulative automobile emissions. Similar minor air quality impacts would be expected for any nearby development, including that caused during construction. The total impact on air quality from the Proposed Action would be minor compared to the total activity at Lake Allatoona. There is no evidence that the proposed action by itself or in conjunction with any other project would have significant impacts on the air quality in the area. The Proposed Action would be constructed in accordance with the GAEPD Georgia Rules for Air Quality Control, Chapter 391-3-1.

10. Water Quality:

The streams located on the project site, and the portion of Lake Allatoona along the southern portion of the project site, are not on the approved 2012 Integrated 305(b)/303(d) List of Streams or List of Lakes. However, as described under Section 2.b. of this Environmental Assessment, portions of Lake Allatoona outside of the project site are included on the approved 2012 Integrated 305(b)/303(d) List of Lakes as not fully supporting designated uses (drinking water/recreation). The criterion violated for the areas identified is for chlorophyll a due to non-point pollution and urban runoff. The Proposed Action would not contribute to or increase the potential constituents that would further impact water quality in Lake Allatoona.

Construction of any of the described facilities could result in a short-term and negligible increase in sedimentation within Lake Allattona. Such sedimentation would be directly related to the timing and size of the area disturbed, rainfall, and erosion control measures implemented. However, the overall water quality of the lake would not be affected due to its size when compared to the size of project site. With respect to the possible increase in sedimentation, silt fencing and other erosion control measures would be used as required by the Georgia Erosion and Sedimentation Act of 1975. All requirements of the Georgia General NPDES Stormwater Permit would be adhered to, including: preparation of an Erosion, Sedimentation, and Pollution Control Plan; preparation and submittal to the GAEPD's Stormwater Management Program of all certificates; and stormwater monitoring throughout the construction phase. These requirements would be completed by a Georgia-licensed Professional Engineer.

The submission of a NOI to begin construction, and a NOT after construction is completed would also be submitted. BMPs would be employed throughout the Proposed Action in accordance with the State of Georgia Manual for Erosion and Sediment Control. The BMPs could consist of a construction exit to prevent tracking sediment offsite, type C silt fence, either stone or hay bale ditch checks, mulching, mat blankets on steep slopes, planting of seasonal temporary grass and final disturbed area stabilization with permanent vegetation. The temporary grassing would be installed as soon as possible after the grading is completed. Routine maintenance of the BMPs would be performed in accordance with the

State of Georgia Manual for Erosion and Sediment Control, which would include silt fencing, and ditch checks when the silt accumulates to the required depth for clean-out; refreshing the construction exit with stone as required; installing additional mulch and mat blanketing as required; and planting additional seeding as required to establish both the temporary and permanent vegetation.

The wastewater treatment facility has been in place since at least 1978. Sewage would continue to be treated on-site, in compliance with GAEPD regulations. Implementation of the Proposed Action would have no appreciable impacts on the existing wastewater treatment facility. The present capacity of the facility is 20,000 gallons per day, which would continue to be adequate for future needs.

Only short-term minor adverse impacts to water quality resulting from implementation of the Proposed Action are expected.

11. Floodplain Impacts:

There are no proposed improvements within the 100-year floodplain on the project site. Thus, there would be no effect on the floodplain with implementation of the Proposed Action.

12. Socioeconomic Impacts:

Because of the enhanced opportunities for recreation and a likely greater use of the project site, it is expected that there would be some minor beneficial impacts to the local economy due to visitors patronizing surrounding gas stations, stores, restaurants, and other existing businesses. These benefits would be proportional to the actual number of people visiting the YMCA Camp High Harbour and any potential increased visitation at Lake Allatoona as a whole. Short-term employment for contractors during construction and for camp counselors during camp activities would also be expected. However, there would be no expected stimulus to new business or to population growth in the local area.

13. Prime and Unique Farmland:

There are no prime or unique farm lands located within the project site area. The Proposed Action would not require a prime farmland evaluation. Thus, there would be no effect on prime and unique farmland from implementation of the Proposed Action.

14. Hazardous and Toxic Materials:

The Proposed Action would have no impact because there are no hazardous material sources on or near the project site. The existing UST (40-MG3) on the project site is used for storage of gasoline and has a capacity of 2,500 gallons. The YMCA of Atlanta, Inc. maintains a Spill Prevention Control and Countermeasures Plan and Spill Contingency Plan that would continue to protect water resources on and surrounding the project site (unnamed streams on site and the lake front areas of Lake Allatoona) in the event of a spill.

15. Other Impacts:

a. Traffic:

It is expected that any development at the project site that results in additional recreational opportunities and that attracts additional persons to the YMCA Camp High Harbour facilities would increase traffic and demand for associated infrastructure on local roads. Such traffic increases under the Proposed Action would be proportional to the intensity of development. In addition, it is assumed that vehicular traffic would also increase for the No Action alternative due to presumed continuing increases in population in the metropolitan Atlanta area and increasing demand for outdoor recreation opportunities.

Because of the nature of outdoor recreational facilities such as those associated with YMCA Camp High Harbour, greater utilization during warmer months compared to cooler seasons and on weekends and holidays compared to non-holiday weekdays is inherent. Therefore, traffic under both the Proposed Action and the No Action alternative would be expected to be heavier on weekends than on weekdays. The greatest traffic demands would occur on holidays and weekends during the summer. Additionally, the types of vehicles composing the traffic would be relative to the types of facilities offered by each of the alternatives. For the No Action alternative, vehicle composition would be expected to remain unchanged from the existing condition, being used primarily by light cars and trucks. The Proposed Action, which promote children's activities, would result in a greater number of smaller vehicles used by parents to bring children to the facility, and a smaller number of service related vehicles, delivery trucks, etc.

Implementation of the Proposed Action would not be expected to impact the Level of Service (LOS) on the local roads. The existing two-lane roadways are adequate to carry the existing conditions as well as the additional traffic due to the Proposed Action.

Thus, the Proposed Action is expected to have a minor impact on traffic conditions at and near the project site given the demand for existing outdoor recreation opportunities at Lake Allatoona.

b. Noise:

The Proposed Action would result in generation of some degree of noise over the existing condition. The primary sources of that noise would come from vehicular traffic, boats, radios, etc., and other machinery used by visitors and employees. The greatest source of noise from the project site would be traffic arriving and leaving the project site. With the addition of cabins and other facilities, it is expected that there would be an increase in visitors during the peak use period. Because capacity and visitation would increase with implementation of the Proposed Action, it is anticipated that there would be a slight to moderate increase in traffic volume during the peak use period. This

is based on the assumption that there is currently low vehicular traffic in the area and on the sound absorbing nature of the local vegetation. The Proposed Action and No Action alternative would result in expected noise levels considered to be minor in nature.

Short-term noise impacts would occur during construction of the facilities to those residents adjacent to the project site. However, noise levels would return to normal once construction is completed and all equipment removed from the area. During the winter months the project site would likely experience the least amount of activity. The majority of post-construction noise would occur from vehicles associated with the park, as well as the voices of the campers themselves. Due to the fact that the project site has been used a recreational facility since 1953, and that camp programs have been operated by the YMCA of Metropolitan Atlanta, Inc. since 2010, adjacent neighbors and the community would not notice an increase in noise levels. Further, the height of activity, thus the height of noise levels, at the project site would occur during daylight hours, while many of the adjacent residents are at work. Thus, the Proposed Action is expected to have a minor effect on noise-related impacts to the local community.

5. CUMULATIVE IMPACTS:

The CEQ regulations define cumulative impacts as “the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other action” (40 C.F.R. § 1508.7). Actions considered in the cumulative impacts analysis include implementation of the action and no action alternatives and other Federal, State, Tribal, local or private actions that impact the resources affected by the proposed action.

Cumulative impacts of the development of recreation facilities at YMCA Camp High Harbour are the total of all incremental impacts, as defined above, which include the management of Lake Allatoona natural resources, recreational facilities, and human development around the lake. Development around the lake would likely continue, primarily on private lands, and would include residential and commercial construction. Such growth would lead to increased human population in the area with accompanying demands for roads, services, and other related infrastructure. The proposed development of the park under the Proposed Action would be consistent with the trend towards development.

6. ENVIRONMENTAL JUSTICE (EXECUTIVE ORDER 12898):

The project site and the surrounding local area do not have disproportionate numbers of minority or low income populations. The project would cause no impact to those populations.

7. PROTECTION OF CHILDREN (EXECUTIVE ORDER 13045):

Children would continue to use Camp High Harbour as operated by the YMCA of Metropolitan Atlanta, Inc. They would provide organized activities targeted for children, and a higher proportion of children would be expected to use the park as opposed to the No Action alternative. Inherent in recreational facilities associated with waterbodies are safety risks not present in non-water related areas. These include such risks as drowning and boating accidents. The YMCA implements safety precautions at the lake designed to protect all visitors including children. Continued strict implementation of those safety measures would assure that there is no disproportionate safety risk to children.

8. IRREVERSIBLE OR IRRETRIEVABLE COMMITMENTS OF RESOURCES WHICH WOULD BE INVOLVED SHOULD THE PROPOSED ACTION BE IMPLEMENTED:

Any irreversible or irretrievable commitments of resources involved in the proposed action have been considered and are either unanticipated at this time, or have been considered and determined to present minor impacts.

9. ADVERSE ENVIRONMENTAL IMPACTS WHICH CANNOT BE AVOIDED:

Any adverse environmental effects that cannot be avoided during implementation of the recommended project are expected to be minor both individually and cumulatively.

10. THE RELATIONSHIP BETWEEN SHORT-TERM USES OF MAN'S ENVIRONMENT AND MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY:

The proposed action constitutes a short-term use of man's environment and would enhance recreational opportunities in the project area.

11. ALTERNATIVES TO THE RECOMMENDED PLAN:

"No Action" Alternative: The CEQ regulations require analysis of the "no action" alternative 40 C.F.R. § 1502.14. "No action" in the case of the YMCA Camp High Harbour would mean that the park would be maintained in its current condition. The surrounding communities would not gain the benefit of an improved outdoor, educational camp facility; however, the park would continue to be managed by the YMCA of Metropolitan Atlanta, Inc., which is a values-based, mission-driven organization.

12. COORDINATION:

Coordination of the proposed action regarding protected species was conducted with Dr. Robin Goodloe, USFWS. The USFWS has concurred with the determination that the Proposed Action would not adversely affect federally listed species. Coordination of the

proposed action regarding cultural resources will also be conducted with the Georgia State Historic Preservation Officer. Copies of correspondence are located in Appendix B.

Public involvement is to be completed in the final report. Copies of comments received during the comment period will be placed in an appendix to the document and summarized in this section.

13. REFERENCES CITED:

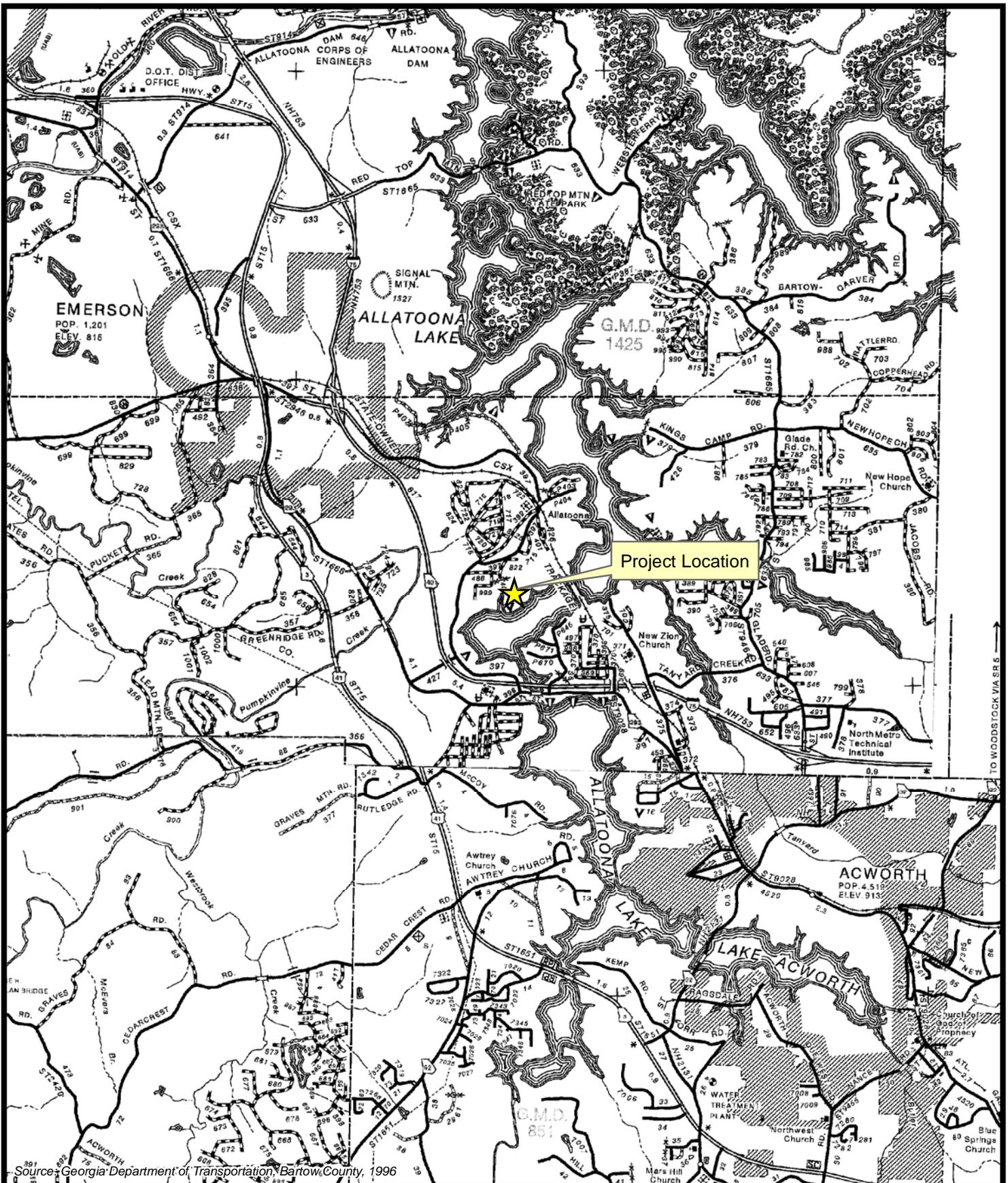
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Appendix A: Figures



Source: Georgia Department of Transportation, Bartow County, 1996

20243-002 loc.mxd

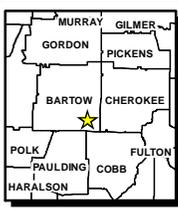


FIGURE 1: Project Location Map



YMCA Camp High Harbour
at Lake Allatoona
Draft Environmental Assessment



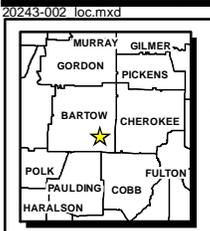
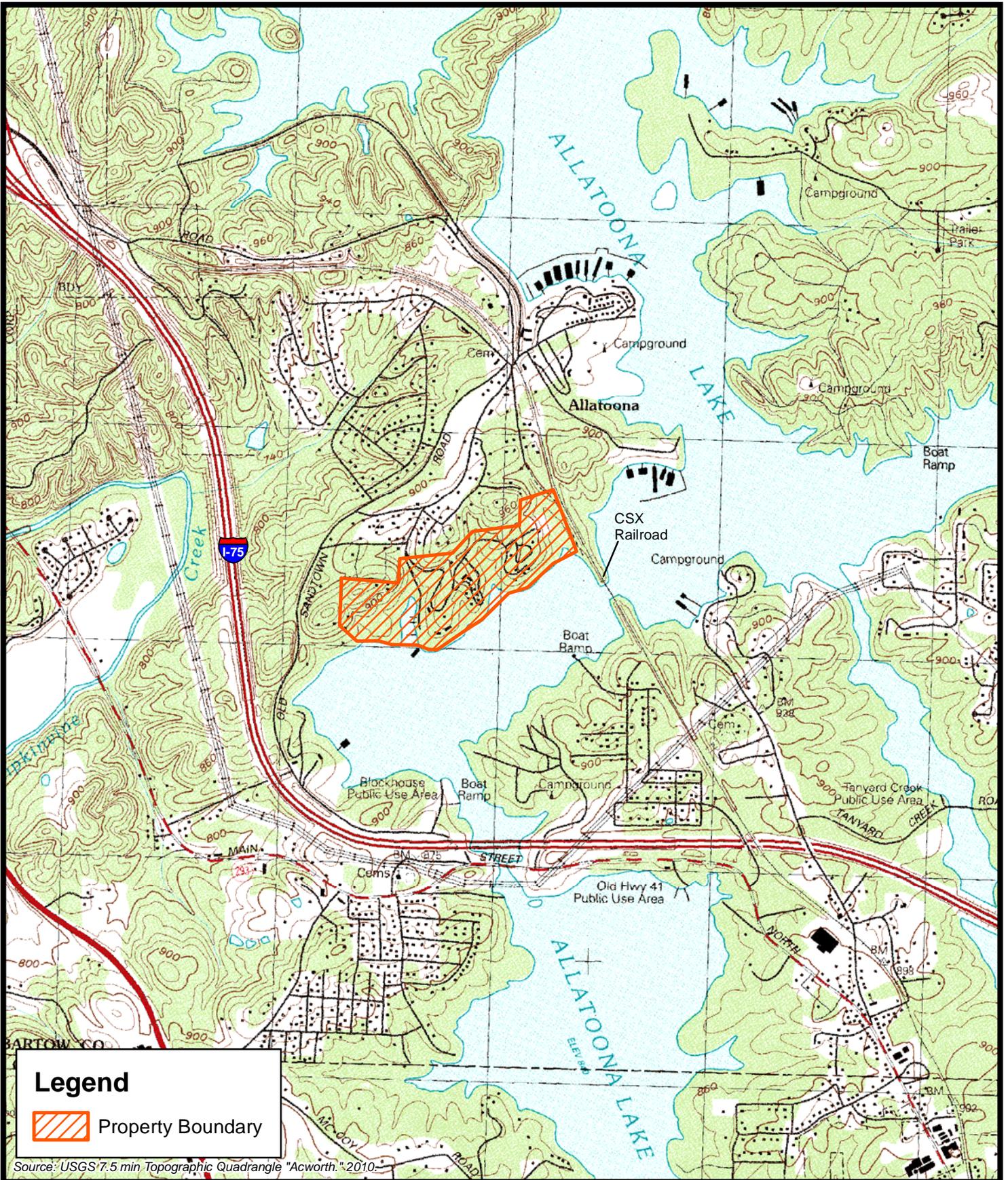
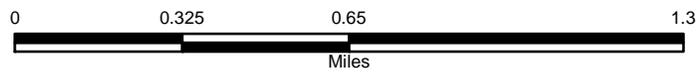


FIGURE 2: Topographic Map



YMCA Camp High Harbour
at Lake Allatoona
Draft Environmental Assessment





LEGEND:

- 1 Front Entrance Security Gate
 - 2 Open-Sided Pavilion at Field
 - 3 Multi-Purpose Field
 - 4 Sports Court and Pavilion
 - 5 Watersports
 - 6 Intimery
 - 7 Open-Sided Pavilion
 - 8 Pavilion
 - 9 Playground
 - 10 Bath House Pavilion
 - 11 Director Housing
 - 12 Administration (Dining Hall, Camp Store, and Offices)
 - 13 Assembly Area and Bathrooms
 - 14 Chapel
 - 15 Outdoor Court/Gym
 - 16 Back Lot (Arts and Crafts, Drama)
 - 17 Maintenance Building
 - 18 Open-Sided Pavilion with Bathroom
 - 19
 - 20 Archery
 - 21 Laundry
 - 22 Pathfinder Cabins
 - 23 Staff Housing
 - 24 Leadership Cabins
 - 25 Open-Sided Pavilion
 - 26 Storage Barn
 - 27 Dining Hall
 - 28 Open-Sided Ropes Course Pavilion
 - 29 Ropes Course and Climbing Tower
 - 30 Open-Sided Pavilion Over Existing Concrete Pad
 - 31 Open-Sided Pavilion Over Existing Concrete Pad
 - 32 People Staff Parking Lot
 - 33 Maintenance Area
- New Construction
 Existing
 Existing Masterplan, Not Constructed
- * Indicates Existing Fabric Table Over Concrete Pad



YMCA CAMP HIGH HARBOUR AT LAKE ALLATOONA
OCTOBER 14 2014



**COLLINS
COOPER
CARUSTI**
Architects

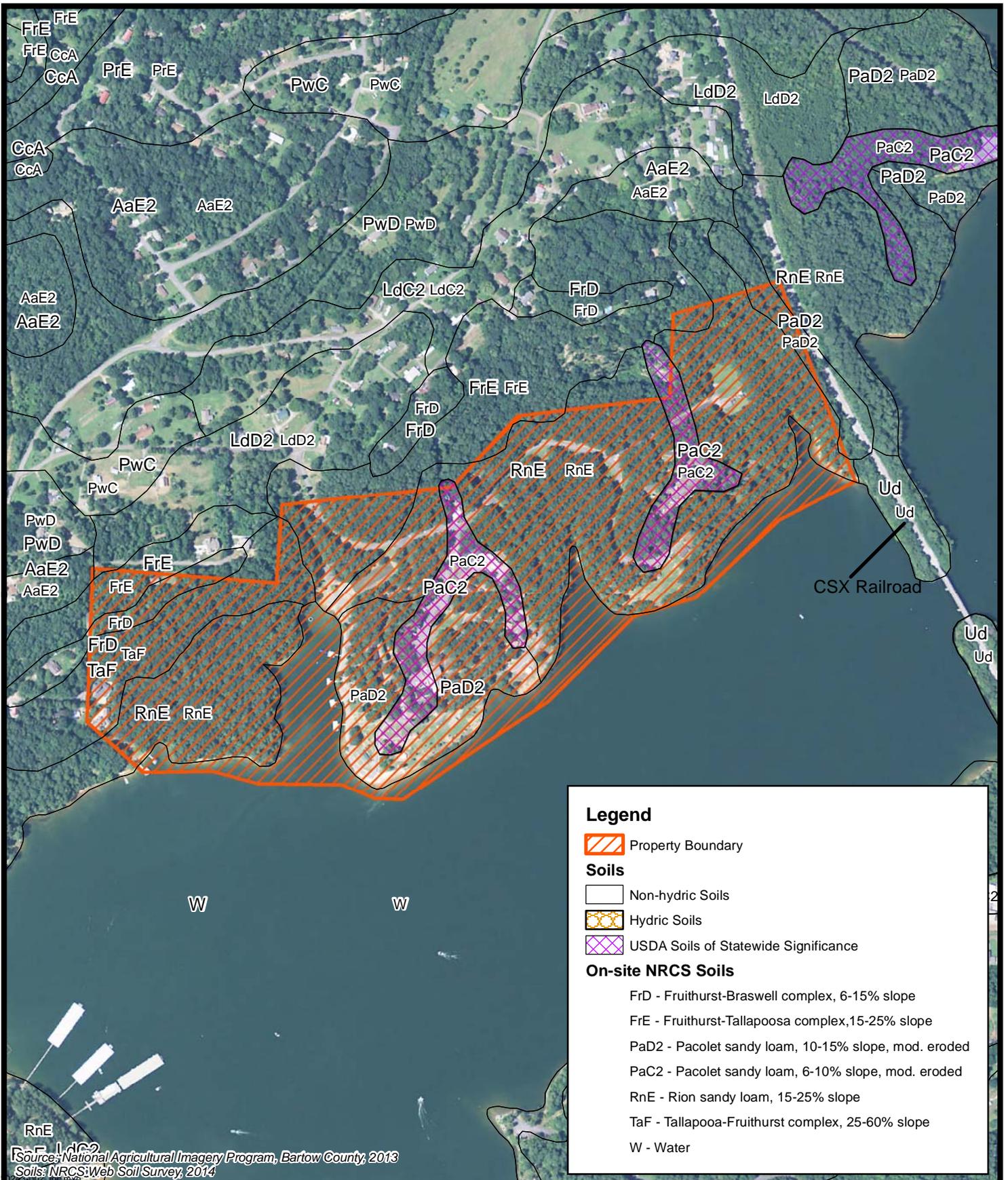
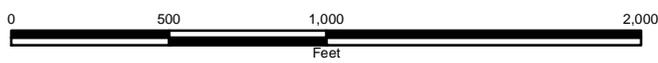
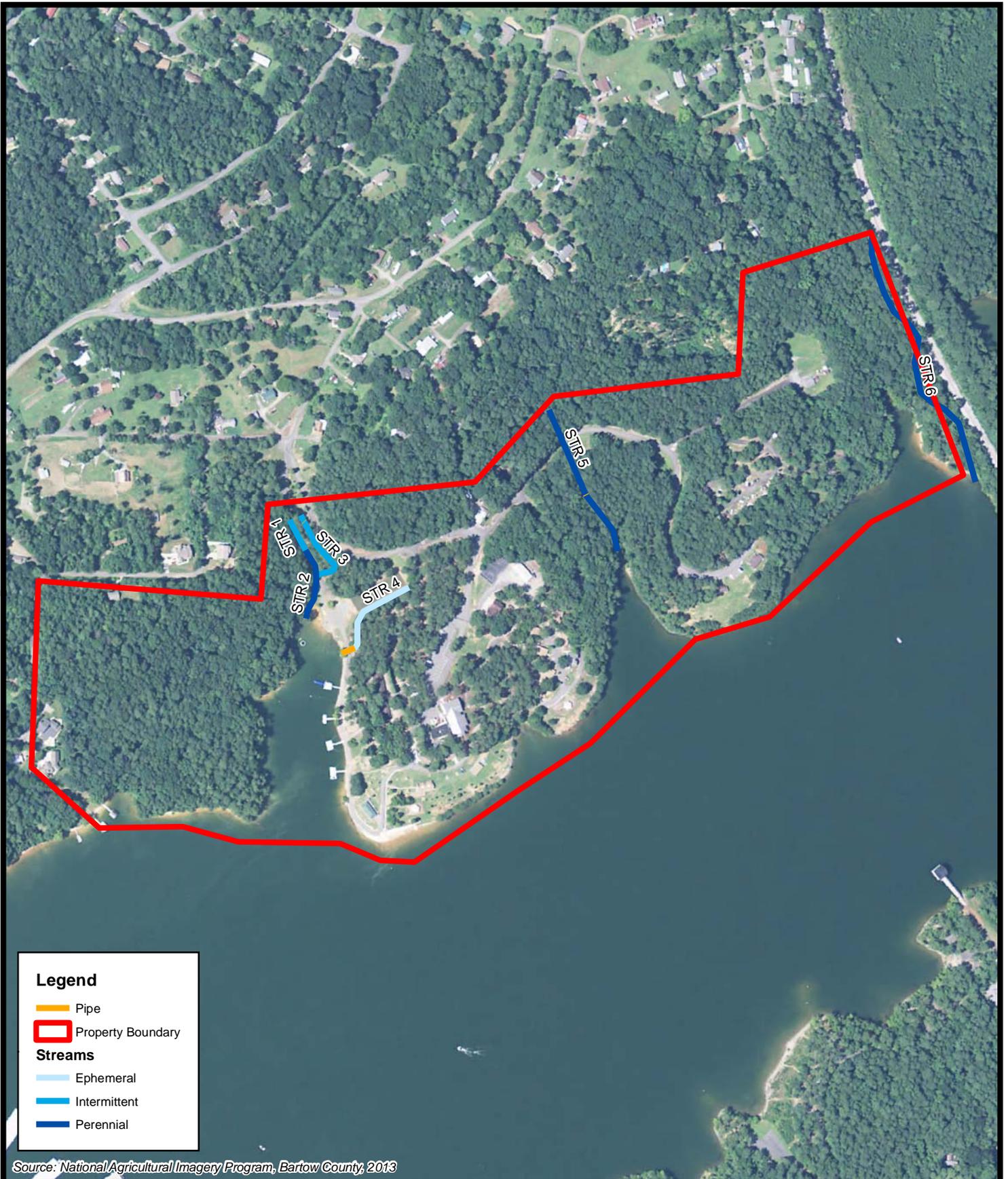


FIGURE 4: Soil Map



YMCA Camp High Harbour
 at Lake Allatoona
 Draft Environmental Assessment



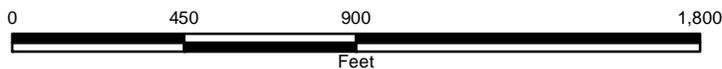


Source: National Agricultural Imagery Program, Bartow County, 2013

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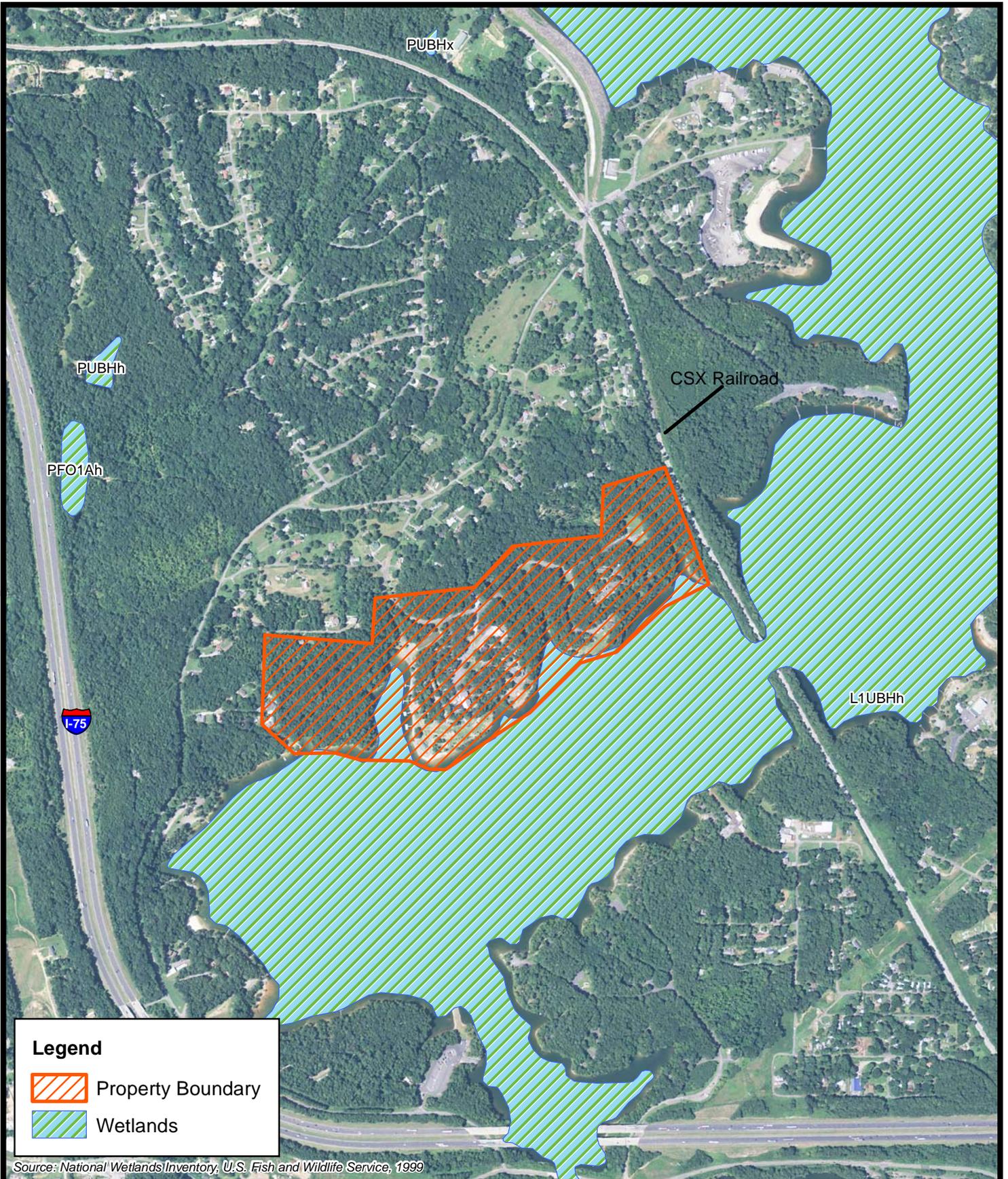


FIGURE 5: Waters of the US Map



YMCA Camp High Harbour
at Lake Allatoona
Draft Environmental Assessment



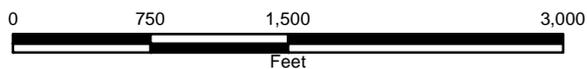


Source: National Wetlands Inventory, U.S. Fish and Wildlife Service, 1999

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FIGURE 6: National Wetlands Inventory Map



YMCA Camp High Harbour
at Lake Allatoona
Draft Environmental Assessment



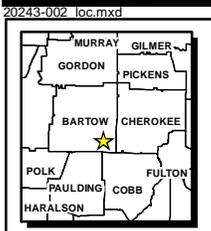
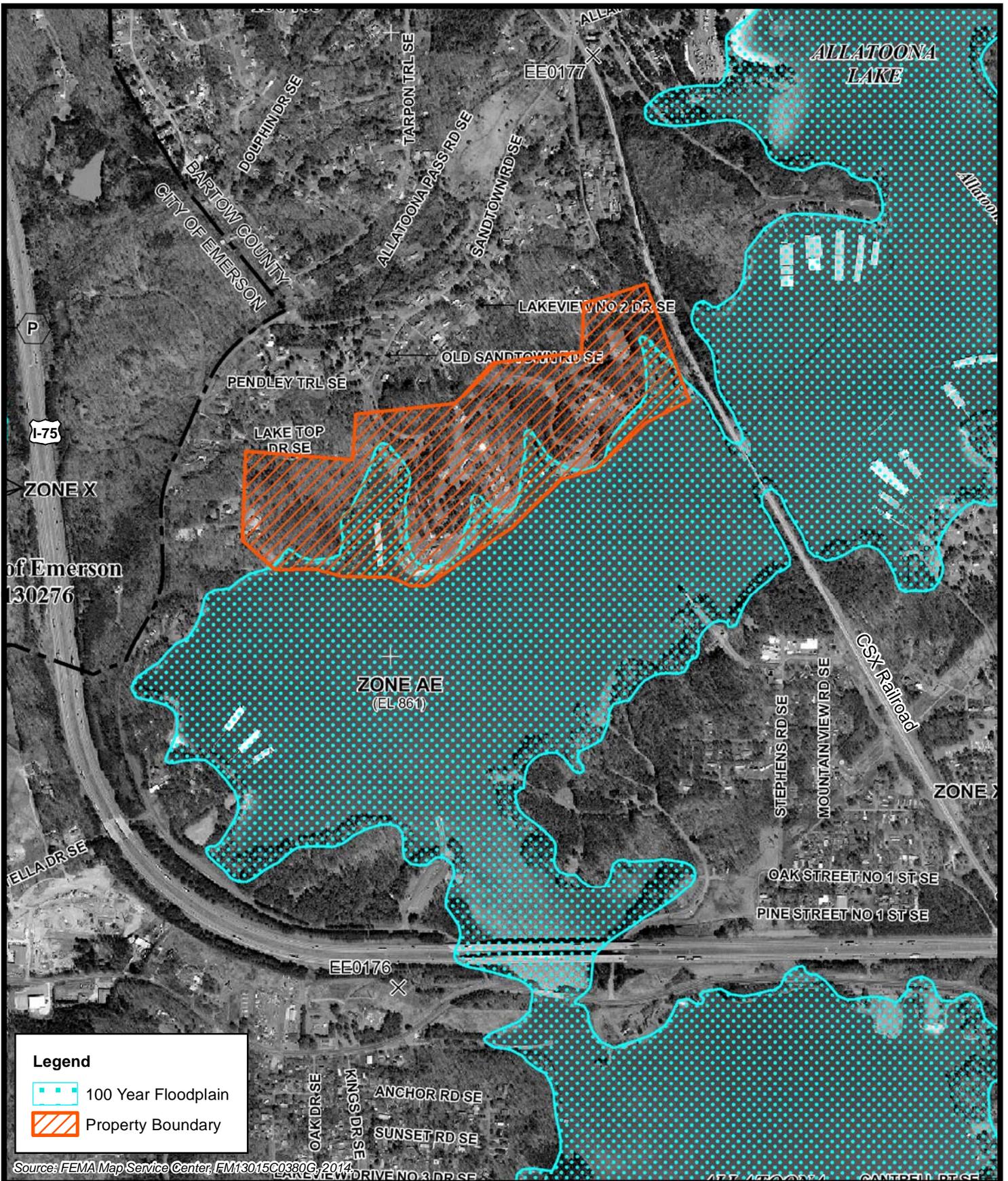
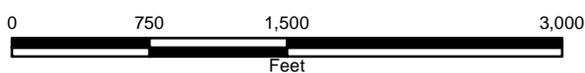


FIGURE 7: Floodplain Map



YMCA Camp High Harbour
at Lake Allatoona
Draft Environmental Assessment



Appendix B: Correspondence



630 Colonial Park Drive
 Suite 200
 Roswell, Georgia 30075
 P 770.998.7848 • F 770.998.5606
 www.ecologicalsolutions.net



U. S. Fish and Wildlife Service
 105 Westpark Drive, Suite D
 Athens, GA 30606
 706-613-9493 Fax 706-613-6059

FWS Log No.

NG-14-229-BART

Based on the information provided, the proposed action is not expected to significantly impact fish and wildlife resources under the jurisdiction of the U.S. Fish & Wildlife Service.

[Signature]
 Donald W. Imm, Ph.D., Field Supervisor

5/20/14
 Date

May 8, 2014

Mr. Pete Pattavina
 U.S. Fish and Wildlife Service
 105 West Park Drive, Suite D
 Athens, GA 30606

RE: Early Coordination Request
 YMCA Camp High Harbour at Lake Allatoona, Bartow County, Georgia

Dear Mr. Pattavina:

The YMCA of Metropolitan Atlanta has prepared a Masterplan to upgrade the facilities at the existing Camp High Harbour on Lake Allatoona in Bartow County, Georgia (see Master Plan Figure attached). The planned upgrades at the park would require an Environmental Assessment (EA) for compliance with the National Environmental Protection Act (NEPA) because the project limits occur within U.S. Army Corps of Engineers (USACE) property along Lake Allatoona and NEPA compliance is required for all projects on federal lands. The approximate midpoint of the proposed project is located at 34.098969 degrees (°), -84.715217°.

The project is being developed in compliance with applicable environmental laws and regulations. This process offers you the opportunity to identify site-specific conditions to be addressed in the environmental information document. In order to assist our field surveys and commitment to protect threatened and endangered species, please inform our office of any known occurrences of state and federally listed species within the project area. We are aware that there are three listed bat species for Bartow County. Please confirm if survey work for bats will be required, to include an approved survey plan, acoustic surveys, and mist net surveys.

Your cooperation is appreciated. If you have any questions or need additional information, please contact me at 770-998-7848 x108.

Sincerely,

ECOLOGICAL SOLUTIONS, INC.

Elaine Lyle

Elaine Lyle
Senior Ecologist

Appendix C: Comments Received During Public Coordination *(to be added in final version)*