

**FINAL ENVIRONMENTAL ASSESSMENT
FOR THE OUTGRANTING OF FEDERALLY-OWNED PARK LAND TO
A NON-FEDERAL ENTITY FOR THE DEVELOPMENT OF BETHEL PARK
LAKE SIDNEY LANIER, FORSYTH COUNTY, GEORGIA**

Prepared by

U.S. Army Corps of Engineers, Mobile District
Planning and Environmental Division
Environment and Resources Branch
Inland Environment Team

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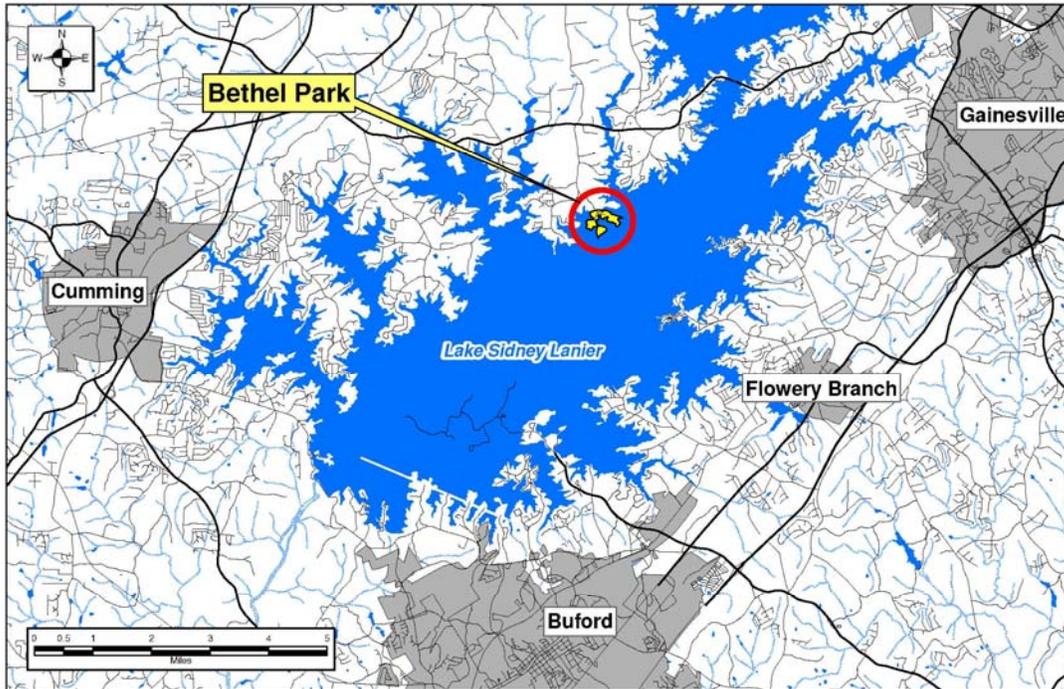
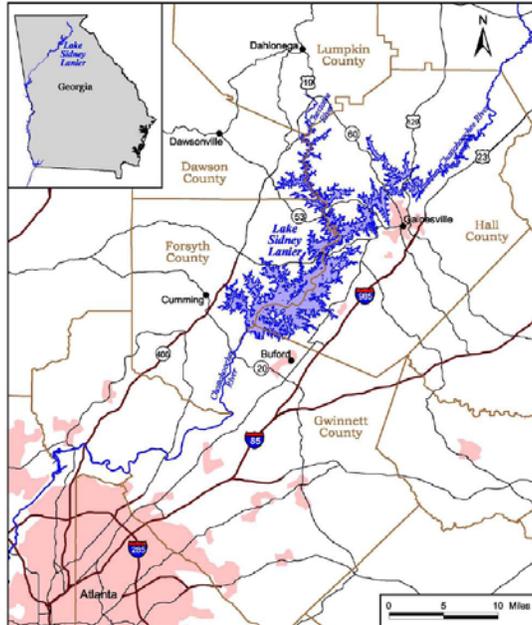
1. INTRODUCTION:

1.1 General: This Environmental Assessment (EA) was prepared as a result of a proposed lease of Federal property managed by the U.S. Army Corps of Engineers (Corps) on Lake Lanier. The proposed lease (outgrant) to a yet undetermined non-Federal entity would constitute a change from the original master plan developed by the Corps for the property. Beginning in 2003, the YMCA of Metropolitan Atlanta (YMCA) sought opportunities to develop a resident camp on Lake Lanier. After early coordination efforts with the Corps' Lake Sidney Lanier Project Management Office, the YMCA proposed the leasing of Bethel Park. The YMCA prepared a Master Development Plan and a Draft EA for the development of the park into a youth camp serving youth, schools, families and community organizations. The Corps adopted and published the Draft EA for a 30-day comment period in May 2006. In response to the Draft EA, the Corps received approximately 1,300 comments opposed to the YMCA proposal and approximately 13,000 comments in favor of the proposal. The latter included numerous signatures on petitions. The greatest concern to those opposed to the proposal was that free public access to Bethel Park would be denied. Representatives of Forsyth County stated that they had not been given the right of first refusal to lease the park, and that areas such as Bethel Park should remain open to public use. Other concerns related to increased traffic on the local roads, the need for road improvements, parking, aesthetics, air quality impacts from the increased traffic, noise, shoreline erosion, destruction of wildlife habitat, the perception that local taxpayers would be required to pay for YMCA improvements, loss of greenspace, and concerns that additional requirements may be placed on Forsyth County for services such as emergency response and law enforcement. Supporters of the proposal generally stated that the proposed camp would provide needed activities for children in a positive environment, support families, and teach community values. No objections were received from other Federal or State agencies including the Georgia Department of Natural Resources, and the Georgia Environmental Protection Division. The U.S. Fish and Wildlife Service by a statement signed July 26, 2006, concurred that species listed under the Endangered Species Act would not be affected and that further action regarding such species would not be required.

In February 2007, Forsyth County and the YMCA provided proposed development plans for their respective proposed leases of the park. In April 2007, the YMCA provided a revised development plan for the park. The purpose of this EA is to evaluate the impacts associated with the proposed outgrant compared to other reasonable alternatives, including the "No action" alternative. It is not intended to evaluate the merits of any specific non-Federal proposal discussed herein, nor to make a decision or choice regarding such proposals.

1.2 Location: The proposed outgrant would be located on Corps land at Bethel Park, which is located on the western bank of Lake Sidney Lanier in Forsyth County, Georgia (Figure 1). Implementation of the Buford Dam Multiple Purpose Project created Lake Sidney Lanier (Lake Lanier) in 1957. Lake Lanier is located in the Gainesville Ridges Section of the Piedmont Physiographic Province south of the Blue Ridge Mountains and is the uppermost Corps project on the Chattahoochee River. The main arm of the lake extends 44 miles up the Chattahoochee River from the Buford Dam. A secondary arm extends approximately 19 miles up the Chestatee

FIGURE 1. LOCATION OF LAKE SIDNEY LANIER AND BETHEL PARK



River. The lake is located in five Georgia counties: Hall, Lumpkin, Dawson, Forsyth, and Gwinnett. The cities of Cumming and Buford are located on the southern end of the lake and the City of Flowery Branch is located on the east side.

1.3 Proposed Action: Currently, the park is partially developed under the overall plan described in the *1987 Updating of the Master Plan for Lake Sidney Lanier (USACE 1987)* (1987 Master Plan) (see Section 2 below). The proposed action is the outgranting of Bethel Park to a non-federal entity such as a governmental agency or non-profit organization. Although the Corps has currently received outgrant applications with proposed development of Bethel Park from two different parties, this would not preclude other potential applicants from making application and providing development plans for the park that could be covered by this EA and ultimately considered by the appropriate Corps element for final approval. A site development plan would be required for any party receiving an outgrant for development of the park. This EA considers a generalized conceptual plan of development that takes into account the environmental impact of a proposed outgrant. Any changes in development plans would require review of such plans by the Corps and if the plans deviate substantially from the impacts described in the EA, appropriate review and documentation as required by the National Environmental Policy Act (NEPA) will be performed.

1.4 Purpose and Need for the Proposed Action: The primary objective of outgranting land at Water Resource Development Projects to non-Federal entities for parks and recreational purposes is to obtain recreational facilities at little or no cost to the Federal Government. Such facilities may be provided directly by the lessee or under subleases or commercial concession agreements with third party concessionaires. The consideration for such leases is to develop, operate and maintain the leased property for the benefit of the United States and the general public. The 1987 Master Plan, published by the Corps, Mobile District, is the most recent comprehensive planning document for the entire Buford Project. The 1987 Master Plan, developed with public input, evaluates existing recreation facilities, identifies recreational needs and provides development and management plans to fulfill those needs. The 1987 Master Plan was developed with the goals of enhancement of opportunities for quality recreational experiences, wise management of natural resources, and management of project facilities in an effective and cost efficient manner. It concluded that a greater demand for recreational opportunities existed than project resources can provide. In the years since the Master Plan was published, demand for recreational facilities in the area has increased with rapidly increasing regional population growth.

1.5 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 as well as licenses to Federal, state or local governmental agencies, where appropriate, to facilitate the construction of substantial improvements. For compliance with NEPA, the *Final Environmental Statement, Buford Dam and Lake Sidney Lanier, Georgia (Flood Control,*

Navigation and Power) was prepared in December 1974 by the Corps, Mobile District (*USACE 1974*) (1974 EIS). An Environmental Impact Statement entitled *Final Environmental Impact Statement for the Operation and Maintenance of Lake Sidney Lanier, Georgia* was prepared in November 2003 by the Corps, Mobile District (*USACE 2003*) (2003 EIS). The purpose of the 2003 EIS was to document the ongoing operation and maintenance activities necessary for flood control, hydropower generation, recreation, natural resources management, shoreline management, and the modification of specific operation and maintenance programs necessary to manage the project on a sustainable basis.

2. ENVIRONMENTAL SETTING WITHOUT THE PROJECT:

2.1 General Environmental Setting: There have been no previous existing environmental studies or documentation for Bethel Park exclusively. However, the general environmental setting of Lake Lanier, surrounding lands, and the watershed, including the area located in Bethel Park, has been extensively documented in the 1974 EIS and the 2003 EIS. The lake and the park land surrounding it have previously been surveyed for ecological and socioeconomic resources as discussed below. In addition, all but a few tracts on the north side of the lake have been surveyed for historic and archaeological resources several years ago.

Lake Lanier is one of a series of reservoirs within the Apalachicola-Chattahoochee-Flint River (ACF) Basin. Therefore, actions in the upstream portions of the ACF can affect conditions downstream, and the system must be considered as an integrated whole. The ACF Basin, which drains areas of northern and western Georgia, southeastern Alabama and northwest Florida, extends approximately 385 miles from the Blue Ridge Mountains to the Gulf of Mexico at Apalachicola Bay. The basin is comprised of 14,500 square miles in Georgia, 2,800 square miles in Alabama and 2,300 square miles in Florida. The major stream regulation in the basin by the Corps' projects is provided by Lake Lanier, which has 65% of the total conservation storage capacity available in the basin.

Lake Lanier is a unique reservoir compared to others operated by the Corps in the Mobile District. It is the most utilized recreation project in the Mobile District; therefore major boat and shoreline overcrowding has resulted. This use combined with extensive residential development around the lake has resulted in shoreline erosion and water quality problems. Other factors influencing shoreline erosion include generally steep slopes and erosive soils. The issues of shoreline development and shoreline erosion are addressed by the Corp's Lake Lanier Project Management Office through the implementation of the *Lakeshore Management Plan*, included as Appendix F to the 2003 EIS. That plan requires limits on construction of new docks and the maintenance of vegetative buffers. Those buffers also provide valuable habitat for wildlife present at Lake Lanier.

Bethel Park is currently partially developed as a park available for public access. There is a boat ramp, pedestrian trails, and parking areas that are utilized by visitors. The park is approximately 61.3 acres in size and is roughly divided by the local topography into four peninsulas. The park site consists of hilly terrain with elevations ranging from 1071 (recreation pool level) to 1150 feet above mean sea level on the steepest island. All four peninsulas contain mixed pine-hardwoods forest dominated by sweet gum (*Liquidambar styraciflua*), tulip poplar (*Liriodendron*

tulipifera), loblolly pine (*Pinus taeda*), white pine (*Pinus strobus*), and several oak species (*Quercus* spp.). In addition, a boat ramp and parking lot are located just northeast of the middle peninsula. Figure 2 shows an aerial photograph of the entire park in its current condition.

FIGURE 2. AERIAL PHOTOGRAPH OF BETHEL PARK



2.2 Significant Resource Description

2.2.1 Water Quality: Water quality of Lake Lanier has been considered in previous environmental studies including the 1974 EIS and 2003 EIS. The overall water quality of Lake Lanier is good, but there are indications that without nonpoint source controls the anthropogenic nutrient sources could cause an increase in eutrophication. The main body of the lake has the greatest transparency and the lowest fecal coliform counts and nutrient concentrations. Those areas in the Chattahoochee River and Chestatee River arms of the lake where the lake is shallower have the highest levels of turbidity, total suspended solids, chlorophyll *a*, and nutrient concentrations.

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 Official Code of Georgia Annotated, Section 12-5-29(c), prohibits discharging the contents of marine toilet holding tanks into Lake Lanier. The primary loading constituents associated with the land uses in the Lake Lanier watershed are sediment, total nitrogen, and total phosphorus. Most nutrient loading enters Lake Lanier from non-Federally owned lands upstream of the lake. It may be noted that septic systems, point sources, and groundwater are significant contributors to the overall loading of nitrogen and phosphorus; however, the largest source of nutrient loading comes from storm water runoff (2003 EIS).

2.2.2 Fishery Resources: There are several important species of sport fish in Lake Lanier, including spotted bass (*Micropterus punctulatus*), largemouth bass (*Micropterus salmoides*), striped bass (*Morone saxatilis*), white bass (*Morone chrysops*), white crappie (*Pomoxis annularis*), black crappie (*Pomoxis nigromaculatus*), and various sunfish (*Lepomis* spp.). Also inhabiting the lake are yellow perch (*Perca flavescens*), carp (*Cyprinus carpio*), catfish (*Ictalurus* spp.), shad (*Dorosoma* spp.), and blueback herring (*Alosa aestivalis*). Fishing is one of the major recreational attractions of Lake Lanier.

2.2.3 Wildlife Resources and Habitat: Throughout the area of Bethel Park, the forested areas are relatively uniform, consisting of such hardwoods species as tulip poplar (*Liriodendron tulipifera*), pignut hickory (*Carya glabra*), shumard red oak (*Quercus shumardii*), white oak (*Quercus alba*), post oak (*Quercus stellata*), and overcup oak (*Quercus lyrata*) interspersed with loblolly (*Pinus taeda*) and white pine (*Pinus strobus*). In addition, one of the peninsula areas contains slippery elm (*Ulmus rubra*) and American beech (*Fagus grandifolia*). The midstory of all three peninsulas contain flowering dogwood (*Cornus florida*), red maple (*Acer rubrum*), and a hawthorn (*Crataegus* sp.). The understory contains dog fennel (*Eupatorium capillifolium*), various asters (*Aster* spp.), muscadine grape (*Vitis rotundifolia*), and greenbriar (*Smilax* spp.). A large area on one of the peninsulas is infested with kudzu vine (*Pueraria lobata*) due to its former clearing for use as a picnic area. Kudzu vine favors open areas with ample sunlight; thus, the clearing creates perfect growing conditions for the invasive vine.

Numerous game and non-game species utilize the area. The significant structural diversity within the forested area (large hardwood overstory trees, scattered openings with shrubs, hardwood midstory, and proximity to lakeshore) provides good habitat for a variety of birds, mammals and other animals thus enhancing the area's value as a recreational resource. Those species include white-tailed deer (*Odocoileus virginianus*), wild turkey (*Meleagris gallopavo*), bobwhite quail (*Colinus virginianus*), mourning dove (*Zenaida macroura*), Canada goose, (*Branta canadensis*), rabbit (*Sylvilagus* spp.), and gray squirrel (*Sciurus carolinensis*), as well as a variety of non-game birds, waterfowl, mammals, amphibians, and reptiles which exist in the waters, clearings, and forested areas of Bethel Park and along the lakeshore.

In recent years accelerating development of adjacent land areas, outside of Corps-owned property and comprised mostly of residential subdivisions has greatly reduced the amount of contiguous habitat available for animals requiring large habitat areas.

2.2.4 Wetlands and Waters: Site topography is steep on much of the property with unvegetated shoreline eroded due to wave action. Because of the requisite presence of wetland vegetation, as well as hydrology and hydric soils to be considered wetland, wetlands do not exist in such eroded areas. The U.S. Department of the Interior National Wetlands Inventory map for the Flowery Branch 7.5 minute quadrangle indicates no wetlands on the park property. Site reconnaissance visits conducted in February 2001 and May 22, 2007 confirmed the absence of wetlands in the project area. However, because of the presence of water at the shoreline, there may exist extremely narrow patches or bands up to a few inches wide of vegetated wetlands in isolated and protected areas. No streams are located in Bethel Park.

2.2.5 Endangered, Threatened or Protected Species: A total of 30 state- and federally-listed protected species, 8 of which are federally-listed as threatened or endangered, are potentially found within Forsyth and the surrounding Georgia counties of Cherokee, Dawson, Fulton, Gwinnett, and Hall (Appendix A). This list was compiled from the Georgia Department of Natural Resources (DNR) Natural Heritage Program county database and the U.S. Fish and Wildlife Service (USFWS) county database. Although no federal or state protected species have been observed within the project area, suitable habitat exists for one state protected species, Indian olive (*Nestronia umbellula*). Indian olive is a common resident of mixed pine/hardwoods forest, often in transition areas between flatwoods. The 2003 EIS stated that only one sensitive species, the Georgia aster (*Aster georgianus*) is found within one mile of the Lake Lanier shoreline. Georgia aster preferred habitat is upland oak-hickory-pine forest. In a stamped response signed by a representative of the USFWS to the YMCA's environmental contractor, dated November 1, 2005, they stated that they concurred that species listed under the Endangered Species Act would not be affected and no further coordination regarding threatened and endangered species would be required. The USFWS reaffirmed that determination of "no effect" to the Corps in July 2006 and January 2008. See Section 9.0 regarding coordination completed after USFWS review of the draft version of this EA.

2.2.6 Historic and Archeological Resources: With the exception of a few small tracts to the north, the fee-owned government lands surrounding Lake Lanier were surveyed for cultural resources between the late 1930s and 1987. These surveys are referenced in Section 3 of the 2003 EIS. No cultural properties were located within the Bethel Park area. The results of these surveys were coordinated with the Georgia State Historic Preservation Office (SHPO) as part of the process for completing the *Historic Properties Management Plan for Sidney Lanier Project, Georgia* in March 1997 (*USACE 1997*). The Georgia SHPO concurred with the findings and recommendations outlined in that document, and no further coordination is needed for this area.

2.2.7 Land Use: The site currently has an information kiosk, two rough trails around the three peninsulas, and boat launching/parking facilities for day use only. The area is mostly used by nearby residents for walking/hiking, boat launching, and shoreline fishing. No user fees are currently charged for any of the facilities. The surrounding area is fairly heavily developed as mostly residential, single family housing in subdivisions. As with the rest of the privately owned

land surrounding Lake Lanier, the area surrounding Bethel Park is a popular vacation and retirement area and essentially serves as a suburb of Atlanta, Georgia. Land use controls on private lands in the area around Bethel Park are imposed by local government. Among the covenants and restrictions are limits on the minimum size of a dwelling, dwelling height, and distance to lot lines. In addition, Architectural Control Committee approvals of individual subdivisions are required for dwelling unit and lot improvements.

The Corps' published plan for Bethel Park is found in *Updating of the Master Plan, Lake Sidney Lanier, Chattahoochee River, GA*. It was approved 25 September 1987, and describes the park as having 45 acres of usable land suitable for moderately intense development. The plan designates a proposed rehabilitation of Bethel Park with 220 overnight RV campsites with a sanitary disposal station, swimming beaches, boat launching facilities, bathhouses, and additional roads throughout the three peninsulas.

2.2.8 Recreation: Lake Lanier is the most popular Corps-owned recreation lake in Georgia. Most recreation activities are water dependent and include boating, fishing, swimming and related activities. However, Bethel Park is not heavily used. Visitation records since 1996, indicate that visitation at Bethel Park is only about one third that of nearby Two Mile Creek Park located approximately one mile to the southwest. Since 2000, yearly visitation has ranged between approximately 12,000 and 22,000 persons. Visitation is seasonal with the greatest use occurring in the warmer months. Visitation ranges from approximately 400 to 700 in December to 2,000 to 5,000 in July. The greater popularity of Two Mile Park may be due to a longer and deeper boat launching ramp even though parking facilities are about the same. Also, Two Mile Park has picnicking facilities that Bethel Park does not have. Similar facilities are also found at nearby Vanns Tavern, Six Mile Creek, and Charleston Parks.

2.2.9 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 assessment was conducted by Ecological Solutions, Inc. on October 7, 2005. No prime farmland soil types were located within the project area; therefore no coordination with the Natural Resources Conservation Service (NRCS) regarding farmland is required.

2.2.10 Socioeconomic: The following community indicators are based on 2000 data. The population of the City of Gainesville and Forsyth County are 25,578 and 98,407 respectively. The City of Cumming, which lies to the west of Bethel Park, has a total population of 4,220. Forsyth County had a 123.2% population growth from 1990-2000; the City of Gainesville had a population growth of 43% for that time period; and the City of Cumming had a growth of 49.2% (*USDOC, Census 2006*).

2.2.11 Traffic: Because of the current low recreational use of Bethel Park, traffic mostly occurs as a result of surrounding residential development. Traffic in and around Bethel Park is generally light and comprised of mostly non-commercial vehicles. Bethel Road and Swiss Air Road are both 2 lane, asphalt roads through generally rolling terrain accessing a relatively sparsely populated residential area with low traffic volumes. Swiss Air Road provides direct access to the proposed Bethel Park area. It intersects with Bethel Road about 2,500 feet (0.5 miles) from the area of the proposed park entrance. Bethel Road continues northward to an

intersection with State Road (SR) 369, Brown's Bridge Road about 6,400 feet (1.2 miles) from the intersection of Swiss Air Road. Current traffic estimates based on data provided by Forsyth County, Georgia indicate that for Bethel Road existing and projected traffic is 3,800, 4,800, and 6,450 vehicles per day for the years 2005, 2015, and 2030 respectively. For Swiss Air Road, existing and projected traffic is 200, 220, and 240 vehicles per day for the same years. In a traffic study commissioned by the YMCA, traffic on local roads was found to be generally at acceptable levels of service with the exception of Bethel Road on weekends. See also Section 5.11 and Table 3.

2.2.12 Noise: There is currently no significant source of noise at Bethel Park. Occasional unquantified levels of noise result from automobile traffic in and around the park and boat launches/take-outs at the boat ramp. Currently, the greatest source of noise comes from automobile traffic entering and exiting the park and not from activities within the park itself. In addition, noise is muted by existing forest cover and by the distance between the park and residential areas.

2.2.13 Air Quality: On November 30, 1993, the Environmental Protection Agency (EPA) 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). The CAA General Conformity Rule applies to Federal actions. Forsyth County, Georgia, in which Bethel Park is located, is within the metropolitan area of Atlanta and is designated by the EPA as a "marginal" area for ozone and "non-attainment" area for particulate matter levels. The marginal and non-attainment designations are based on results of air sampling and resulting degree to which national ambient air quality standards, as defined by EPA, are not currently being met (*USEPA 2007*).

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. Bethel Park currently sits in a quiet neighborhood with residential development in progress approximately 0.25 mile north on Bethel Road. The park receives little in vehicle traffic, with the exception of lake access on holidays by the surrounding communities.

2.2.14 Water Supply: Bethel Park does not provide a direct source of water supply nor does it have water transmission lines on the property. Lake Lanier provides a source for water withdrawal to five municipal authorities, as stated in the 2003 EIS. Those include City of Cummings, Forsyth County Board of Commissioners, City of Buford, City of Gainesville, and the Gwinnett County Water and Sewage Authority. Stormwater runoff from Bethel Park, including any pollutants carried by the runoff, flows into Lake Lanier, part of which eventually enters into the water treatment system of those water users. Currently, the only known contaminants entering Lake Lanier from Bethel Park are insignificant amounts of hydrocarbon products from vehicles and boats launched at the boatramp.

2.2.15 Public Safety: Public Safety issues at Bethel Park are the same as those for other Federally-owned lands at Lake Lanier and were evaluated in the 2003 EIS.

2.2.16 Hazardous and Toxic Materials: A hazardous materials report was compiled (*Environmental Data Resources, Inc. 2005*) and no evidence of hazardous and/or toxic material was found on this site. The nearest underground storage tank (UST) is located on RT 13 and the nearest leaking underground storage tank is on SR 306 at 6805 Keith Bridge Rd. Both sites are more than a mile from Bethel Park and therefore, have no effect on the project area. Throughout its history with the Corps, this site has not been used for storage or disposal of such substances. There is no reason to suspect that such materials exist on the site.

2.2.17 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 2003 EIS described the existing demographic makeup of the areas surrounding Bethel Park and for the State of Georgia. Bethel Park is not considered an area of disproportionate numbers of minority or low income populations.

2.2.18 Protection of Children: On April 12, 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 Corps policies, programs, activities, and standards. Historically, children have often been present at Lake Lanier 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. The 2003 EIS described the current safety precautions at the lake designed to protect all visitors including children.

Some of the safety measures described in the EIS would not be relevant to safety issues at Bethel Park. As an example, the Corps broadcasts by AM radio and siren a warning when water is about to be discharged from the dam to the downstream reach. However, many of the described measures have a direct positive effect on the safety of children. Those include a safety task force at the lake that promotes safety through education aimed at children, training, inspections, and law enforcement, swim lines established at beaches with permanent signs warning of dangers of swimming beyond the line, notifying the public of low water hazards, and rangers performing safety patrols during the recreation season.

2.2.19 Aesthetics: Bethel Park is currently a lightly developed park 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 Lake Lanier and its associated recreational uses, improvements at Bethel Park, and surrounding residential development.

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

The proposed action is the outgranting of Bethel Park to a non-federal entity such as a governmental agency or non-profit organization. Although the Corps has currently received outgrant applications with proposed development of Bethel Park from two different parties (Appendices B, C), this would not preclude other potential applicants from making application and providing development plans for the park that would be covered by this EA and ultimately considered by the appropriate Corps element for final approval. A site development plan would be required for any party receiving an outgrant for development of the park.

This EA considers a generalized conceptual plan of development that evaluates the environmental impact of a proposed outgrant. Such a plan, while not specific in detail, includes development to a degree similar to or less intensive than that described in the Master Plan for Bethel Park (See Section 2.2.7 above). The development of Bethel Park under this alternative would continue to be for “moderately intense development”, the same as described in the Master Plan. However, such development by a non-Federal party could differ in nature and scope from the 1987 Master Plan. The development may differ from the 1987 Master Plan in proportion of amenities or facility types constructed. For example, the relative percentage of roads, campsites, and structures may not be the same as for the 1987 Master Plan. However, the development under the outgranting would be limited to the same total developed area on the three southern peninsulas as the 1987 Master Plan. The 1987 Master Plan provides for a total developed area of approximately 1.4 million square feet, including roads, foot trails, campsites, structures, and parking areas. Also, the primary purpose of the development would be limited to facilities related to outdoor recreation in a park-like setting. For example, camping, camp activities, and picnicking could be considered related, whereas team sports facilities would not, unless constituting a minor part of the overall development. The development may include the partial clearing and development of the three peninsulas, construction of new roads, construction of permanent structures, paved parking spaces, provision for swimming and boating opportunities, use of the park by several hundred people at any given time, and overnight accommodations including camping facilities, but not including hotel type facilities. Such a plan, although allowing the non-Federal entity to restrict usage or charge fees for specified activities, would continue to offer use of pre-existing or comparable facilities either at specified areas/times within Bethel Park or at nearby locations. The parties that have currently presented proposed development plans and have made a request for an outgrant at Bethel Park include the Forsyth County Board of Commissioners and the YMCA which are shown in Appendices B and C. These are considered typical examples of development that could occur given outgranting to a non-Federal entity, but do not necessarily represent final plans by either party. Their presentation here does not attempt to compare the merits of the two plans, nor select one as preferred over the other. Other similar proposals would be considered by the Corps. Any changes in development plans by these or future applicants would require review of such plans

by the Corps and if the plans deviate substantially from the impacts described in this EA, appropriate review and documentation as required by NEPA will be performed. Each of the two development proposals that have been currently received are described in the following subsections.

3.1 Forsyth County Board of Commissioners Plan: (Adapted from Forsyth County Report to Mobile District, see Appendix B):

The Forsyth County proposed Bethel Park Master Plan (Figure 3) was developed with the desire to match user needs with the unique environmental characteristics of the site. The entrance of the park was designed to facilitate the movement of vehicles. A round-about was added at the entrance, so that vehicles can easily turn around when the park is closed. Separate entrances for day use and camping would be provided from the round-about.

The camping area is proposed on the eastern peninsula, where the slopes are flatter to better accommodate recreational vehicles. Approximately 75 total camping sites would be provided for both recreational vehicles (RV) and tent campers. The percentage of RV sites would be maximized, with tent only sites constructed in areas where site constraints prevent the construction of RV sites. All sites would be equipped with electrical service to remove the need for generators within the campground. Washhouses and comfort stations would be within close proximity to the campsites. Two shelters would be provided for the use of camping groups. Walking trails would connect the camping area to the day use area to provide campers access to the beach.

The day use area is on the western peninsula. The boat ramp and trailer parking is the first use encountered after passing through the day use gate. This removes these users from the traffic stream. Just beyond the boating area, the entrance drive would terminate into a 90-space parking lot. A loop drive around the parking lot would allow for buses to turn around and drop off students. Group shelters would be located in this area to accommodate large group needs. From this parking lot, users could proceed further west to the environmental education area and open free-play meadow, to the beach and additional picnic shelters.

The environmental education area would give visitors the opportunity to see and study the unique characteristics of the park. An office/visitor center is proposed here to provide a base for staff to work from, for exhibits including aquariums for local aquatic species, and for storage. Classes may be held in the small amphitheater or in impromptu gatherings amongst the trees or along the shore. The program may utilize the group shelters for outdoor classrooms when appropriate.

Activities supported at the day use area include picnicking, walking, swimming and fishing. A beach is proposed in the cove immediately south of the parking lot and environmental center. This area is naturally shallow and can be easily protected from boat traffic. A comfort station and picnic shelters would be provided in this area. Trails would continue south from the beach, providing access to additional picnic shelters. The trails would loop around and bisect the peninsula, providing walkers views from the shoreline and from the highpoints.

3.2 YMCA Plan (Adapted from YMCA Draft EA, see Appendix C):

The proposed YMCA plan (Figure 4) would include the construction of a combination of concrete sidewalks, gravel aggregate, cleared natural trails and boardwalks in addition to the proposed facilities and parking areas. A front entrance gate would also be constructed. The front entrance gate would be constructed of aluminum and be approximately eight feet in height and 26 feet in overall length. An automatic gate operating system including a keypad would be installed, requiring telephone entry access. The gate model to be used is double-opening.

Each of the three peninsulas, nearly surrounded by water, would form “islands” of developed area. Island I would contain the main parking lot, which would provide space for 156 cars. The second parking lot currently exists as the boat ramp parking lot, located between the proposed front entrance and Island II. It would not be modified and currently holds up to 48 cars. It would primarily be used as an overflow parking area.

The various paved walkways and roadways would be of various widths and serve to connect the islands to one another and to provide safe and effective nature trails for participating campers.

There are existing trails on the subject site. On Islands II and III, the trails appear to be in good condition and may only be slightly modified from their existing condition. The trail on Island I is much less developed and would require paving using the same materials as described for the parking lot.

A six-foot wooden privacy fence is proposed for the northeast side of the park, blocking the view of the camp from adjacent single-family houses. A vegetative screen would be added to further obscure view of the residences from the inside of the park, as well as add aesthetic value to the structure.

Facilities: Phase I

Island I: The facilities on this island would serve as the primary facilities for the camp. A total of 16 structures are proposed for construction on this island during Phase I of the project. The site amenities to be constructed include: 1) a large field complex in the center of the island for baseball/softball activities; 2) an airnasium (an open-air gymnasium)/multi-purpose court, which would span approximately 80' x 100'; 3) a 500-person capacity assembly area; 4) a marina and first aid station; and 5) a fishing pier.

The buildings to be constructed on Island I during Phase I of construction include: 1) five resident cabins at 3,395 sq. ft. each; 2) a 1,600 sq. ft. director's cabin; 3) a 1,200 sq. ft. maintenance building; 4) a 15,575 sq. ft. dining hall, including spaces for administration, a camp store, dining, a kitchen, a stage, restrooms, an infirmary, infirmary living quarters, mechanical storage and staff living quarters; 5) a 1,400 sq. ft. pavilion; 6) an 810 sq. ft. A/V booth and amphitheater stage; and 7) a 200 sq. ft. first aid building.

Island II: No buildings would be constructed on this island during Phase I of the project. However, two beach areas would be constructed between Islands II and III, separated by a proposed pathway connecting the two islands. The beach on the south side of the pathway would be approximately 100 feet long and 50 feet wide, and the beach on the north side would be approximately the same length as the first beach and only 40 feet wide.

Island III: The only construction proposed to take place on this island during Phase I is the creation of a multi-level ropes course. It would be the main structure on this island and would take up a large portion of land in the center.

Facilities: Phase II

Island I: A total of nine structures are proposed for construction on this island during Phase II of the project. Site amenities to be constructed include: 1) an outdoor pool; 2) a 500-person capacity, approximately 70' x 60' assembly area, including a stage; and 3) dock facilities with space for 6-12 sailboats.

The buildings to be constructed include: 1) two 2,325 sq. ft. staff cabins; 2) the dining hall would be finished, with the construction of 8,688 sq. ft. of classrooms and locker rooms on the lower level; 3) a 12,300 sq. ft. gymnasium; 4) an 8,610 sq. ft. main chapel with a 500-person capacity; and 5) an 810 sq. ft. A/V booth and stage.

Island II: A total of 13 features would either be constructed or designated on this island during Phase II of the project. Site amenities that would be constructed or designated include: 1) construction of an approximately 46' x 33' assembly area with a 150-200-person capacity; 2) the designation of an open space area to be used for miscellaneous activities; and 3) the designation of an archery area.

Buildings to be constructed during this phase include: 1) seven 3,395 sq. ft. resident cabins; 2) a 2,340 sq. ft. chapel with a 150-200-person capacity; 3) a 1,400 sq. ft. pavilion; and 4) an 810 sq. ft. A/V booth and stage.

Island III: A total of three structures would be constructed on this island during Phase II of the project. The only site amenity is a 150-200-person capacity amphitheater that measures approximately 46' x 33'. Buildings to be constructed include: 1) a 1,400 sq. ft. pavilion; and 2) an 810 sq. ft. A/V booth and stage.

Appropriate sediment and erosion control efforts would be practiced during camp construction, and all disturbed areas would be hydroseeded and protected with a hydraulically applied soil guard bonded fiber matrix.

Various water, sewage and power elements would be installed onsite in order to meet health and safety standards for the camp. County water is available on Bethel Road, which, according to the Forsyth County Water System Master Plan, is an 8-inch water main. A booster pump might be needed if adequate pressure is not available. A fire line with hydrants spaced 500 feet apart would be required to provide fire service. A six-inch water main would be installed connecting

all three islands to the existing eight-inch water main on Bethel Road. Two-inch water mains would also be installed, connecting the facilities to the six-inch water main, and also connecting Island II and Island III.

A sewage pump station would be constructed approximately 300 feet southeast of the entrance gate, to which a three-inch sewage force main that would run the length of the park would be connected. Both Island II and Island III would contain a wastewater disposal area, along with a 35,000 GPD sewage treatment facility (complete with septic tanks, filters and pumps). The method for wastewater disposal would be a subsurface irrigation system using drip tubing installed at a shallow depth (6" to 8"). The drip tubing contains emitters spaced 2-feet on centers, which constantly emit 0.5 gallons per hour per emitter. The wastewater is disposed of via evapotranspiration, plant uptake and percolation into the soil. In addition to water uptake, the plants also uptake nutrients from the wastewater. Pending final design of the septic system based upon soil testing and percolation testing, it is the design intent that the drip lines would be located within the playing fields. Bermuda grass is the plant of choice for maximum nutrient uptake. The Bermuda grass would be harvested and removed from the disposal area to prevent the nutrient from returning to the soil when the grass decays. The disposal area can be used for recreational purposes, excluding equestrian activities. The animal hoofs can penetrate the ground surface and damaged the drip tubing.

The wastewater treatment plant proposed would include a) pretreatment to remove grease, fats and oils, and sedimentation to remove solids detrimental to the treatment process, b) anaerobic treatment of the wastewater, and c) primary, secondary and tertiary filtration. In 2005, the Georgia Environmental Protection Division promulgated a General Permit for Small Community Systems, which was especially created for this type of system.

All water and sewer lines would be installed next to the roadway and trails whenever possible. Except for the gravity lines for the buildings, the water lines and sewer force mains would be installed at an approximate depth of 3-4 feet and a width no greater than 18-inches to minimize land disturbance. The gravity sewer mains would be located within areas to be cleared for the construction of the buildings whenever possible. The location of the treatment facilities would be within areas designated for recreational purposes.

Power would be supplied to the buildings via pad mounted transformers. Sawnee EMC is the provider for the area and would provide the routing and installation of the site electrical system. All proposed utility lines would be buried underground.

A 1,000-gallon gasoline tank would also be placed along the roadway, adjacent to the Overflow Parking and Staging Area. It would be placed in an area that is above the 1,085-ft contour level (designated as the flood pool level) and used to fuel vehicles and boats for the camp. The tank would be installed in accordance with all state and local codes.

In addition to the facilities to be constructed at Bethel Park, the YMCA will work with the Corps to fund improvements at Two Mile Park. Improvements will include restroom upgrades, trails, shoreline protection, picnic sites and boat ramp and ramp parking additions. Improvements at

Two Mile Park will coincide with the development of the camp at Bethel Park and will compensate for the loss of free public access to Bethel Park.

4. ALTERNATIVES TO THE RECOMMENDED ACTION:

4.1 “No Action” Alternative: The Council on Environmental Quality (CEQ) regulations require analysis of the “no action” alternative 40 Code of Federal Regulations (C.F.R.) § 1502.14. “No action” in the case of Bethel Park would mean that the park would be minimally maintained in its current condition. The existing facilities including parking areas and the boat launch area would continue as they have been in the recent past, natural areas would remain undeveloped and current use of the park for hiking, fishing, boating and picnicking would continue.

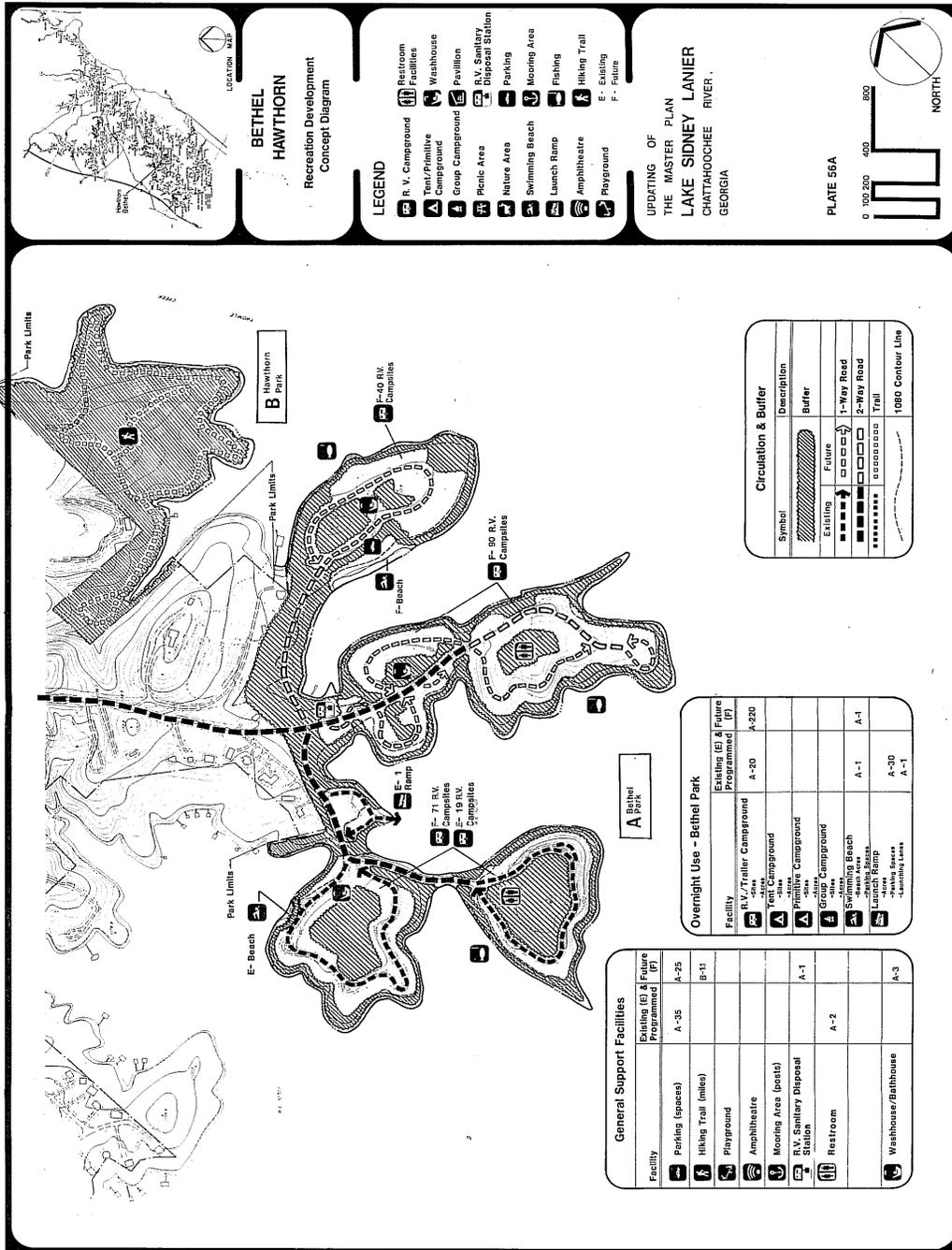
4.2 Implementation of the Corps 1987 Master Plan: As previously discussed, implementation of the original 1987 Master Plan would include 45 acres of usable land suitable for moderately intense development on all four peninsulas. That plan includes rehabilitation of Bethel Park with 220 overnight RV campsites with a sanitary disposal station, swimming beaches, boat launching facilities, bathhouses, and additional roads throughout the three peninsulas. The approved plan for development of Bethel Park as shown in the 1987 Master Plan is presented in Figure 5.

The 1987 Master Plan has not been implemented and likely will not be implemented in the foreseeable future. However, the Corps has determined that the degree of recreation-related development described in the 1987 Master Plan is consistent with the project purposes and remains a long-term possibility, and viable alternative action.

For the purposes of evaluation of environmental impacts, this alternative considers the development of the same three peninsulas that were considered in the recommended action, and as those areas were described in the 1987 Master Plan. The 220 campsites include 40 sites that are on the northern-most peninsula. That peninsula would not be developed by either of the submitted proposals under the recommended action. Therefore to compare impacts on the same geographic area, those 40 sites were excluded leaving 180 proposed sites on three peninsulas.

5. ENVIRONMENTAL IMPACT OF THE PROPOSED ACTION: Environmental impacts of the proposed action are described for each of the following significant resource areas and are compared generally with implementation of the Corps’ Master Plan. Both the recommended action and the implementation of the Corps’ Master Plan involve similar scope and nature of project development, i.e. partially clearing the three southern peninsulas at Bethel Park, road construction, campsite development, building and road construction, etc. for the purpose of providing outdoor lakeside recreational facilities. The fourth peninsula in the northern part of the park would remain undeveloped. Therefore, that area would be subject to no environmental impacts due any of the action alternatives. The nature of impacts of outgranting the park to a non-Federal entity versus implementing the Master Plan are considered to be similar, unless otherwise noted below. No change in existing environmental conditions would be expected with the No Action Alternative. A summary of the environmental impacts associated with each of the three alternatives, with the currently submitted outgrant proposals presented separately, are shown in Table 1. A matrix comparing the total development area of the No Action Alternative

FIGURE 5. BETHEL PARK MASTER PLAN DEVELOPMENT



with that of the Master Plan and the two non-Federal plans is shown in Table 2. Further detailed discussion of those impacts are presented beginning in Section 5.1.

In addition to the impacts described at Bethel Park, a development similar to that proposed by the YMCA would involve potential environmental impacts at Two Mile Park resulting from the upgrades previously described. The degree of those impacts would depend on the specific nature of the upgrades. In general, such upgraded facilities are considered to have minor and insignificant impacts so long as the environmental impacts, including potential impacts to Federally listed Threatened and Endangered species and archeological resources, are determined to be consistent with that considered in the 2003 EIS and Master Plan. In that case, further environmental documentation would not be required. If they are not considered consistent, further environmental evaluation as required by NEPA would be completed.

TABLE 1 – SUMMARY OF PROJECT IMPACTS BY ALTERNATIVE

FACTORS	No Action	Corps Master Plan	Outgrant	
			YMCA	FORSYTH COUNTY
1. Water Quality	No effect	Adverse-minor	Adverse-minor	Adverse-minor
2. Fishery Resources	No effect	Negligible	Negligible	Negligible
3. Wildlife Resources and Habitat	No effect	Adverse-moderate	Adverse-moderate	Adverse-moderate
4. Wetlands and Waters	No effect	No effect	No effect	No effect
5. T&E Species	No effect	No effect	No effect	No effect
6. Historic/Archeological Resources	No effect	No effect	No effect	No effect
7. Land Use	No effect	Adverse-minor	Adverse-minor	Adverse-minor
8. Recreation	Beneficial-minor	Beneficial-moderate	Beneficial-moderate	Beneficial-moderate
9. Prime or Unique Farmland	No effect	No effect	No effect	No effect
10. Socioeconomic	No effect	Beneficial-minor	Beneficial-minor	Beneficial-minor
11. Traffic	Negligible	Adverse-minor	Adverse-minor	Adverse-minor
12. Noise	Negligible	Adverse-minor	Adverse-minor	Adverse-minor
13. Clean Air	Negligible	Adverse-minor	Adverse-minor	Adverse-minor
14. Water Supply	Negligible	Negligible	Negligible	Negligible
15. Public Safety	Negligible	Adverse-minor	Adverse-minor	Adverse-minor
16. Hazardous and Toxic Materials	No effect	No effect	No effect	No effect
17. Environmental Justice	No effect	No effect	Beneficial-minor	No effect
18. Protection of Children	Negligible	Negligible	Negligible	Negligible
19. Aesthetics	Negligible	Adverse-minor	Adverse-minor	Adverse-minor
20. Cumulative Impacts	No effect	Adverse-minor	Adverse-minor	Adverse-minor

TABLE 2 – SUMMARY OF DEVELOPED AREAS BY ALTERNATIVE

Key Resource Impact Features	Existing Conditions	Corps Master Plan	Non-Federal Outgrant Plans	
			Forsyth County Plan	YMCA Plan
Total Development Area (sq ft)	432,745	1,306,915	894,545	933,957
1-Lane Roads (linear ft.)	5,710	10,492	0	0
2-Lane Roads (linear ft.)	2,790	2,790	7,788	7,315
Trails (linear ft.)	0	0	11,974	4,180
Structures (sq ft)	400	3,200	24,550	113,171
Campsites	20	180	65	0
Campsite Clearings (sq ft)	88,000	792,000	286,000	0
Parking Spots	30	30	90	201
Parking Areas (sq ft)	4,995	4,995	14,985	33,467

5.1 Water Quality: Construction of any of the described facilities could result in a short-term and negligible increase in sedimentation within the lake. 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 will not be affected due to its size when compared to the size of Bethel Park as well as its utilization as a filter for the Chattahoochee and Chestatee watersheds. 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 National Pollutant Discharge Elimination System (NPDES) Stormwater Permit would be adhered to, including preparation of an Erosion and Sedimentation Control Plan, preparation and submittal to the GAEPD’s Stormwater Management Program of all certificates, and stormwater monitoring throughout the construction phase; all completed by a Georgia-licensed Professional Engineer. The submission of a Notice of Intent (NOI) to begin construction, and a Notice of Termination (NOT) after each phase of the project is completed would also be submitted. As required by the State of Georgia, phased construction would be employed with each phase completed before subsequent phases are initiated, thereby limiting the amount of disturbed area at any given time. Best Management Practices (BMPs) would be employed throughout the project in accordance with the State of Georgia Manual for Erosion and Sediment Control. The BMPs would consist of sediment ponds to trap and detain sediment during construction, 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 backfill is placed.

Routine maintenance of the BMPs would be performed in accordance with the State of Georgia Manual for Erosion and Sediment Control, which would include the removal of sediment from the sediment ponds, 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.

Sewage would be treated either on-site by an appropriate septic system or off-site via connection to the local sewerage system, in compliance with GAEPD and Forsyth County regulations. Therefore, only short-term minor adverse impacts to water quality resulting from the proposed Bethel Park lease are expected.

5.2 Fishery Resources: The development of Bethel Park would have no impact on fish habitat, spawning areas or food sources. There would be no associated impacts on water quality (see above) that could impact fish populations. There could be an increase in number of sport fishermen resulting from the development of the park for any of the proposed alternatives. Because of the small numbers involved, any increased use of Lake Lanier by sport fishermen would have negligible impacts on fisheries resources.

5.3 Wildlife Resources and Habitat: Both the proposed action and the Corps' Master Plan would result in moderate impacts to wildlife and their required habitat. 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 including the undeveloped fourth peninsula of Bethel Park and other undeveloped shoreline in the vicinity. 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.

Total developed area for the proposed action is similar for both the YMCA and Forsyth County proposals (Table 2). However, there are expected differences between the two proposals in the types of development because different recreational user needs of the two plans. For example, the YMCA plan would involve a relatively larger area of structures and parking, while the Forsyth County Plan would involve a relatively larger area of campsites and campsite clearings. However, total developed area would be similar involving moderately intense human use of the park during peak seasons. The impact to wildlife described above would be moderate for the proposed outgrant to a non-Federal party and for the Corps Master Plan and would ultimately depend on the total area disturbed. The comparison in Table 2 is based on the Corps Master Plan being implemented on the same three southern peninsulas as the outgrant; but, if it were implemented in its originally approved form, the fourth peninsula would be included in campsite development resulting in proportionally greater impacts to wildlife and other environmental concerns.

The 2003 EIS identified approximately 20.8% of the Lake Lanier shoreline as designated recreation areas, of which Bethel Park is a part. The remaining shoreline, approximately 79%, is designated as "limited development" or "protected". Both designations provide for limited development in each respective area. One of those areas that would remain in a "protected" status is the undeveloped fourth peninsula of Bethel Park. The continuing undeveloped nature of that area as well as large percentage of shoreline that would remain undeveloped assures that

adequate wildlife habitat would continue to exist and that impacts would be lessened under any of the action alternatives.

Rapid development of the surrounding non-Federal properties for residential subdivisions, which has been previously discussed, has reduced suitable habitat for wide-ranging animal species in the vicinity of the park. Species such as black bear and bobcat have large territory needs and have been largely eliminated from developing suburban areas like the area around Lake Lanier. Such impacts have already occurred and will likely continue to occur regardless of the alternative considered. Development of the park under any of the proposed alternatives would have little or no impact on such species because of such existing and ongoing habitat loss in the region.

5.4 Wetlands and Waters: Because there are no wetlands or streams on the project site, no impacts would occur.

5.5 Endangered, Threatened or Protected Species: Although suitable habitat exists for one state protected species, the Indian olive (*Nestronia umbellula*), state-listed as threatened, there has been no record of its occurrence in Bethel Park or Two Mile Park. Likewise, the state-protected Georgia aster (*Aster georgianus*) discussed in the 2003 EIS, has not been reported at the sites. In stamped responses signed by a representatives of the USFWS dated November 2005, July 2006, and January 2008, they stated that no further coordination regarding threatened and endangered species would be required. The Corps has initially determined that the currently proposed action would not likely adversely effect threatened or endangered species. This determination has been coordinated and concurred with by the USFWS during and after the Draft EA has been made available for review and the results updated in this Section and in Section 9.0 of this document.

5.6 Historic and Archeological Resources: As stated in section 2.2.6 above, previous surveys have found no cultural properties located within the park area, and the results have been coordinated with the Georgia SHPO, which concurred with the findings. There are no sites eligible for the National Register of Historic Places (NRHP) which would be adversely affected by the proposed action.

5.7 Land Use: Based on 16 USC 406(d), the Secretary of the Army is authorized to lease lands if those leases are in the best interest of the general public. The approximate 61.3 acre site, roughly half of which is usable land, is adequate in size for construction of the facilities proposed via any of the three action alternatives. As previously stated, approximately 20.8% of the shoreline is designated as recreation areas, of which Bethel Park is a part. The remaining shoreline, approximately 79%, is designated as “limited development” or “protected”. Of the total Lake Lanier property, approximately 30% is designated as recreation and the remaining 70% “limited development” or “protected”. The total land area designated for recreation is 5,329.5 acres. Development of 61.3 acres out of the total recreation designation, and consistent with the Lakeshore Management Plan is considered a minor impact for any of the action alternatives.

The current use of Bethel Park as a partially developed public, day-use recreation area with limited facilities would be potentially changed to a moderately intensely developed recreation area controlled by a non-federal entity. The proposed uses of the park by non-Federal entities include similar total size development areas (Table 2). Such development would include similar-

sized overall land use changes; however they vary by the nature of type of facility proposed, e.g. structures vs. R.V. campsites. The three southern peninsulas of the property, owned by Corps would be leased for the proposed park and would include various potential recreation facilities. Some of the facilities may be restricted by the non-federal entity or fees may be charged for use of some facilities. The northern peninsula would be retained by the Corps and maintained in a protected status, as previously discussed.

The existing land use allows public fishing, hiking, picnicking and boating access to the lake. In order to assure continued access to similar facilities, development plans submitted for review to the Corps prior to approval of any outgrant may include provision to offer similar facilities either at specified areas/times within Bethel Park or at nearby locations. The development associated with the proposed action would be commensurate with the development and land use described in the 1987 Master Plan.

5.8 Recreation: Because the park is currently only lightly used for recreation (12,000-22,000 visitors per year as previously discussed), 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, other potential users of either of the action alternatives, including those facilities proposed by the YMCA, the Forsyth County plan, or the Corps Master Plan could view such developed facilities as beneficial. Currently the park is only restricted against overnight camping. The degree of negative impacts on recreation would vary depending on the nature and scope of development implemented and the amount of fees charged to users. The YMCA plan has proposed to provide use of facilities either at Bethel Park or at Two Mile Park via facility improvements at Bethel Park commensurate with those that currently exist. In addition, the fourth, northern peninsula would remain in its current undeveloped state, and with continued access to the public.

Development of similar facilities at Two Mile Park would replace any potential loss of recreational opportunities at Bethel Park. As an example of such action that could be considered is the previously discussed plan by the YMCA to provide improvements at nearby Two Mile Park. Those improvements will be accomplished through YMCA funding of restroom upgrades, trails, shoreline protection, picnic sites and boat ramp and ramp parking additions. Improvements at Two Mile Park will coincide with the development of the camp at Bethel Park and will compensate for the loss of public access to Bethel Park (See Section 5.0). For such compensation to replace the loss of facilities, the Corps would require the non-Federal entity to enter into an agreement to fund specific improvement, and upon receipt of such funding from the other party, the Corps would implement the work.

Generally, any of the action alternatives 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 park. The benefits to recreation would stem from the developments proposed, whether a highly developed RV campground or a day camp for children. 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 Action Alternatives.

5.9 Prime and Unique Farmland: There are no prime or unique farmlands in the project area, and therefore there would be no impact.

5.10 Socioeconomic: Because of the enhanced opportunities for recreation and a likely greater use of the park, 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. Those benefits would be proportional to the actual number of people visiting Bethel Park and any potential increased visitation at Two Mile Park. A full development as stated in the Master Plan would likely attract more visitors, and have a greater benefit to local businesses. A less intense development, such as the existing park, would attract fewer visitors, while moderate development would result in intermediate impacts. Even with the development described in the Master Plan, there would be no expected stimulus to new business nor to population growth in the local area.

In addition, there would be an expected beneficial impact from additional recreational opportunities, and education through possible construction of nature trails and interpretive centers.

5.11 Traffic: It is expected that any development at Bethel Park which results in additional recreational opportunities and which attracts additional persons to the park will increase traffic and demand for associated infrastructure on local roads. Such traffic increases would be expected for the proposed action, as well as for development of the park by the Corps under the Master Plan and would be proportional to the intensity of development. In addition, 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 Bethel Park, greater utilization during warmer months compared to cooler seasons and on weekends and holidays compared to non-holiday weekdays is inherent. Therefore, with any of the alternatives discussed, including the “No Action” alternative, traffic 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, with some towing boats to the boat launch. For the Corps Master Plan, there would be much greater representation by RVs, travel trailers, and larger vehicles towing them. With the outgranting of the park to a non-Federal entity, the types of vehicles seen could vary. For example, a large number of RV spaces such as that proposed by Forsyth County would result in a greater number of those types of vehicles. A development promoting 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.

Based on an analysis of traffic patterns provided by Forsyth County Board of Commissioners as part of their request to lease Bethel Park, Bethel Road existing and projected traffic is 3,800,

4,800, and 6,450 vehicles per day for the years 2005, 2015, and 2030 respectively. For Swiss Air Road, existing and projected traffic is 200, 220, and 240 vehicles per day for the same years.

Based on the same study, the development of the park with multiple use areas, including moderately dense campgrounds, trails, picnic areas, and fishing and swimming areas, would have no impact to Level of Service (LOS) on the local roads. With the development of Bethel Park as presented and discussed by Forsyth County in previous sections of this document, the existing roadway network and intersection of Swiss Air Road and Bethel Road will continue to function at an acceptable LOS throughout the design year projections. The existing 2 lane roadways are adequate to carry the existing conditions as well as the additional traffic due to the proposed park development. A summary of the respective LOS for the roadway segment analysis and the intersection analysis are shown on Tables 3 and 4 below. LOS is a commonly used traffic engineering rating to indicate quality of traffic flow on road segments, with level A being the highest or best rating and level E the lowest or worst possible. The analysis did not include the intersection at Browns Bridge Road with Bethel Road and Jot em Down Road.

A Traffic Impact Study was also provided by the YMCA for their proposed development of Bethel Park. Existing conditions as given in that report are described in Section 2.2.11. In that study they stated that due to the primary focus of the development – a week-long summer camp for children with pickups and dropoffs occurring on weekends, traffic impacts would be highly skewed towards Saturdays (pickup days) and Sundays (dropoff days). For the study, traffic was based on an estimated 300 children per weekly camping session during the summer, resulting in approximately the same number of vehicles added to local traffic flow on Saturdays and Sundays. During weekdays, very little traffic would be generated, with 10 or fewer daily entries and exits by staff members constituting the traffic flow. Therefore, traffic flow would peak

TABLE 3 - ROADWAY SEGMENT ANALYSIS

Location	Existing Peak LOS 2005 AM / PM	Proposed Peak LOS 2030 AM / PM
Swiss Air Road	A / A	A / A
Bethel Road	A / A	A / A

TABLE 4 - INTERSECTION ANALYSIS

Intersection	Proposed Peak LOS 2030 Without Park AM / PM	Proposed Peak LOS 2030 With Park AM / PM
Swiss Air Road / Bethel Road	B / B	B / B

at a predictable time each Saturday and Sunday during the summer. Based on the expected peak traffic flows, an LOS analysis was made at the Browns Bridge Road/Bethel Road/Jot em Down Road intersection and at the Bethel Road/Swiss Air Road intersection. A summary of the LOS for existing conditions and as a result of the proposed development is shown in Tables 5 and 6.

The study showed that traffic would be slowed at the peak times along Bethel Road and Jot em Down Road as a result of the development, with delay times increasing to over six minutes in the case of northbound traffic on Bethel Road. For southbound traffic on Jot em Down Road, LOS would deteriorate from level C to level F on Saturday and level E on Sunday; however, actual delay times would be much less compared to the northbound traffic on Bethel Road. LOS would continue at acceptable levels along Browns Bridge Road and Swiss Air Road. The study pointed out that although Bethel Road and Jot em Down Road would experience traffic delays, such delays are not uncommon on side streets at major thoroughfares during peak hours. It was suggested that a traffic control officer could be placed at the intersection to facilitate traffic flow from the side streets onto Browns Bridge Road. In addition to the traffic volume discussed above, a number of delivery trucks and similar service vehicles would be expected to travel on the local roads accessing the development because of the need for supplying food and other supplies for use by approximately 300 children. Such traffic would be only occasional and would be expected to occur during working hours on weekdays when traffic would be lightest.

The traffic study according to an e-mail dated April 24, 2008, included a 3% yearly background growth rate until the year 2010. The year 2010 was used, according to the YMCA because standard industry practice for traffic impact studies is to evaluate future traffic based on the full occupancy year of the proposed use. After that point traffic increases would be due to reasons other than that caused by the development of the park. They also stated that a new high school would be planned for development in 2011. The school, according to the YMCA e-mail, would be located off highway 369 and Jot em Down Road and Highway 369 is a major highway capable of handling heavy commuter traffic and peak traffic which may occur as a result of the new school. They stated that their projections demonstrate no significant impact on area traffic. They also stated that Forsyth County Schools are open and generate significant traffic from August through May, and that the proposed YMCA programs would generate very little traffic during this time. Most of the planned use by the YMCA of Bethel Park would take place during summer months when public schools are closed.

A separate potential impact related to traffic could result from vehicles waiting to drop off children at the camp. Such stopping by cars on the on local roads could block the flow of traffic. In a response by e-mail dated April 24, 2008, the YMCA stated that conditions that had resulted in such traffic blockages by cars waiting in line at another YMCA camp have only occurred at a YMCA camp in the north Georgia mountains where terrain does not allow for overflow parking. Other YMCA camps were cited where overflow parking has been provided and such problems have been avoided. The proposed YMCA camp would have adequate parking, according to the response and such traffic blockages would not occur.

Additionally, proposed upgrades at Two Mile Park including restroom upgrades, trails, shoreline protection, picnic sites and boat ramp and ramp parking additions could result in increased

visitation at that location. Based on current traffic at both parks, the associated traffic increases are expected to be small and constitute an insignificant impact.

TABLE 5 – EXISTING INTERSECTION OPERATIONS

Intersection	Sat Peak Hour		Sun Peak Hour	
	LOS	Delay (sec.)	LOS	Delay (sec.)
Browns Bridge Rd (SR 369) / Bethel Rd / Down Rd				
-Eastbound Left (SR 369)	A	8.3	A	8.6
-Westbound Left (SR 369)	A	8.6	A	8.3
-Northbound Approach (Bethel Rd)	F	50.2	E	46.1
-Southbound Approach (Jot em Down Rd)	C	24.9	C	23.8
Bethel Rd / Swiss Air Rd				
-Westbound Approach (Swiss Air Rd)	A	8.8	A	9.0
-Southbound Left (Bethel Rd)	A	1.1	A	2.0

TABLE 6 – YMCA FUTURE INTERSECTION OPERATIONS

Intersection	Sat Peak Hour		Sun Peak Hour	
	LOS	Delay (sec.)	LOS	Delay (sec.)
Browns Bridge Rd (SR 369) / Bethel Rd / Jot em Down Rd				
-Eastbound Left (SR 369)	A	8.4	A	8.7
-Westbound Left (SR 369)	A	9.2	A	8.8
-Northbound Approach (Bethel Rd)	F	401.4	F	351.8
-Southbound Approach (Jot em Down Rd)	F	51.7	E	43.9
Bethel Rd / Swiss Air Rd				
-Westbound Approach (Swiss Air Rd)	A	9.2	A	9.5
-Southbound Left (Bethel Rd)	A	4.8	A	5.5

Even though by outgranting to a non-Federal entity such as the YMCA, traffic could increase on Bethel Road or Jot em Down Road to the point that noticeable delays were present, it is not anticipated that such delays would be a major adverse impact for several reasons. First, such delays are not uncommon where side roads intersect major roads. Second, such delays would be limited to certain peak hours on weekends. Third, such delays can be mitigated through the placement of traffic control officers for those peak hours, thereby assisting in the flow of traffic onto the major highway. Similarly, it is anticipated that an outgrant to a non-Federal entity such as Forsyth County would result in acceptable traffic flows. Even though traffic would be dominated by large RVs and other large camping-related vehicles, the numbers of such vehicles would not be so concentrated as to cause major adverse traffic impacts. Therefore, it is anticipated that under both development alternatives, either the outgranting to a non-Federal

entity or the development of the park by the Corps under the Master Plan, traffic on local roads, including those at Two Mile Park, would not be a significant adverse impact.

5.12 Noise: All of the park development alternatives would result in generation of some degree of noise over the existing condition. The sources of that noise would come from vehicular traffic, boats, radios, etc., and other machinery used by park visitors and employees.

In an analysis of potential noise impacts provided by Forsyth County as part of their request to lease the park, they stated that the greatest source of noise would originate from vehicles traveling to and from the park, not from the park itself. They also stated that because the park is located on Lake Lanier, the area is already subject to noise impacts related to the use of recreational vehicles such as boats, jet skis, etc. The report stated that because of the distance from the greatest source of noise on the roads and because traffic noise is related to the speed of travel of vehicles, such noise would be minimal. It also stated that the park has significant tree cover which would absorb noise from inside the park.

In an analysis of noise provided by the YMCA, potential noise sources of the proposed project were reported to be construction related, camp activities, and traffic volume. It reported that noise from construction activities would produce low levels of noise coming from site grading, traffic, and erection of building structures. Such noise would be temporary, lasting only during the construction schedule. To test the noise generation that would come from one of the larger camp assembly areas, the YMCA tested a portable public address (PA) sound system similar to what would be used in the actual camp at the location of the assembly area. Sound level measurements and audibility observations were conducted close to the nearest residences and the proposed entrance to the park. None of the measurements resulted in a measurable difference from ambient noise levels which ranged from 51.2 to 56.0 decibels. Audibility tests of the system indicated that noise from the PA system was either “inaudible” or “barely audible”. Based on those observations and measurements, they concluded that no sound impact on adjacent residential properties would occur from the campfire assembly area even with an amplified public address system. Unamplified voice sounds associated with singing or other group activities would produce noise levels less than those of the PA system. A limited number of motorboats proposed for use by the YMCA is predicted to generate less noise than the current use of the boat ramp (No Action alternative). For open field activities such as those associated with team sports, swimming pool use, beach use, etc., voice sounds were not expected to be audible in adjacent residential areas. Noise from vehicle traffic would be greatest at the times of peak traffic flow, which would occur at the peak weekend hours previously discussed. Because of the relatively low volumes of traffic associated with the pickup/dropoff of approximately 300 children and the speed limits in the local area, the report concluded that traffic-generated noise was not expected to cause a significant impact.

Based on reports submitted by both of the current applicants for a lease of the park and in consideration of the general nature of the activities which could potentially occur in the park, the greatest source of noise from the park would be traffic arriving and leaving along Bethel and Swiss Air Roads. It appears that those conclusions appear justifiable based on the generally low vehicle traffic in the area and the sound absorbing nature of the local vegetation. It appears that developments similar in nature to those proposed, the Corps Master Plan, or the No Action Alternative would result in expected noise levels considered to be minor in nature.

5.13 Air Quality: Compared to the No Action alternative, the project would have both short term and long term effects on emissions into the air as a result of exhaust from internal combustion engines. Construction of the project would generate emissions from heavy 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, will 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. After project completion, the use of automobiles and other vehicles, mostly by visitors traveling to and from the park, would further contribute to emissions. Continuing growth and urbanization in the area of Lake Lanier will result in increased automobile emissions. In the case of limited development such as the plan proposed by the YMCA, most traffic would be expected to be relatively local in nature and those further emissions would be minimal. Somewhat greater emissions could come with the development of recreation vehicle sites. For such plans including the Corp's Master Plan, or that proposed by Forsyth County, a number of visiting vehicles would be expected from outside the metropolitan Atlanta area, each producing greater emissions. However, those air quality impacts would be expected to be minor.

As discussed in the traffic analysis submitted by Forsyth County, daily traffic on Bethel Road would increase from 3,800 vehicles per day to approximately 4,800 vehicles per day between 2005 and 2015. Under the YMCA plan, traffic would increase by approximately 300 cars per day on weekends for a limited number of weeks during the summer. By comparison major urban traffic arteries measure traffic flow in tens of thousands of vehicles per day. Therefore, the proposed increases in traffic in the local area would be relatively small and the overall contribution of air contaminants by those numbers of vehicles is expected to be minor. 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. Similar minor air quality impacts would be expected for any associated development at Two Mile Park, including that caused during construction and the increased use of the park by additional visitors.

5.14 Water Supply: Because adequate control of stormwater runoff into Lake Lanier is expected both during the construction phase and during use of the park, as required by the GAEPD and treatment of waste water would occur as regulated by the State of Georgia, there would be no expected impact to public water supplies. County water is available via an eight-inch water main located on Bethel Road to any potential lessee or development at Bethel Park, subject to local ordinances and regulations. Because adequate existing potable water supply infrastructure are in place adjacent to Bethel Park, water use by any of the action alternatives is not deemed to have a significant adverse impact on the local area's water supply resources.

5.15 Public Safety: Adequate monitoring and regulation by Park Rangers and other staff at the Lake Lanier Project, in addition to local law enforcement officials, assure that the important sources of potential injury and accident to the public, such as boating accidents, drowning, fire, firearm use, etc. are managed to minimize risk to the public. Such compliance would continue to be required by the holder of the outgrant and therefore public safety would not be compromised.

5.16 Hazardous and Toxic Materials: The proposed action would have no impact because there are no hazardous material sources close to Bethel Park.

5.17 Environmental Justice: Bethel Park and the surrounding local area do not have disproportionate numbers of minority or low income populations. Because the YMCA provides scholarships or discounted memberships to low income families, there would be a minor beneficial impact in the metropolitan Atlanta service area of the YMCA. Otherwise, the project would cause no impact to minority or low income populations.

5.18 Protection of Children: Children would continue to use Bethel Park and potentially under the partial control of a non-Federal lease holder such as the YMCA. In the case of the YMCA, they would provide organized activities targeted for children, and a higher proportion of children would be expected to use the park than for other alternatives or development plans that have been submitted to date. 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 2003 EIS described the current 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, regardless of which alternative is considered.

5.19 Aesthetics: Because of the currently existing human-modified nature of the area including the construction of a parking area, previous campground, day use area and man-made lake, whose purposes include the construction of water-related recreational facilities, the further construction of those types of facilities could be considered by some observers to have no significant impact on the aesthetic appeal of the area. 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.

5.20 Cumulative Impact: 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 Bethel Park are the total of all incremental impacts, as defined above, that include the management of Lake Lanier natural resources, recreational facilities and human development around the lake. Those cumulative impacts have been discussed in the 2003 EIS and include expanding and modifying recreational facilities at numerous points around the lake. That evaluation determined that 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 any of the action alternatives, including the potential upgrades at Two Mile Park, would be consistent with the previously

described trend towards development. More recent actions proposed at Lake Lanier include proposed development at Mary Alice Park. Mary Alice Park is a park approximately six miles southwest of Bethel Park, for which a private development of a multi-story hotel and conference center has been proposed. That proposal was evaluated in a Mobile District supplemental Environmental Assessment (USACE 2007). Part of the proposed action would include the relocation of public boat ramps and beaches to nearby locations. Because there would be no net loss of recreational facilities at Mary Alice Park, there would be no cumulative impacts associated with the current proposal. The currently proposed action would not result in any change in cumulative impacts from those previously evaluated in the 2003 EIS.

6. 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.

7. ADVERSE ENVIRONMENTAL IMPACTS WHICH CANNOT BE AVOIDED: Any adverse environmental effects, which cannot be avoided during implementation of the recommended project, are expected to be minor both individually and cumulatively.

8. 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 will enhance recreational opportunities in the project area.

9. COORDINATION: The Draft EA was made available for review by the interested public and agencies on January 18, 2008. The Draft EA was placed on the Mobile District internet web site and a news release was made through the Mobile District Public Affairs Office announcing its availability. Individual e-mail notices of the EA's availability were sent to Forsyth County, the YMCA, USFWS, EPA, and the Georgia Department of Natural Resources. Paper copies were made available for review at the Lake Sidney Lanier Project office at Buford, Georgia. The Draft EA was made available for comment for a period of 30 days, ending on February 19, 2008.

A total of 4,904 comments were received during the public comment period. Almost all of the comments expressed a preference either for or against one of the two current applicants for a lease of the property, or for or against a specific type of activity that could occur at the park as a result of leasing to one of the applicants. Because of the similarity in the nature of many of the comments, they were categorized by the general nature of the comment and for each topic, specific concerns are listed and discussed below. All of the original comments are on file in the Mobile District, U.S. Army Corps of Engineers.

As a result of comments received and issues raised, additional information was requested of each of the applicants by separate e-mails on April 10, 2008. Forsyth County responded by e-mail dated April 14, 2008, and the YMCA responded by e-mail dated April 24, 2008. A copy of those e-mails is provided in Appendix E.

U.S. Fish and Wildlife Service by telefaxed statement signed January 22, 2008 by Sandra Tucker, Field Supervisor, stated “Based on the information you provided, no further action is required under Section 7(a)(2) of the Endangered Species Act. However, obligations under the Act must be reconsidered if the project is modified, if it may affect newly listed species or designated critical habitat, or if new information indicates it may affect listed species or critical habitat in a manner not considered in our review.”

Response: No further action or response pursuant to the Endangered Species Act is required.

Banks and Stubbs, LLC, attorneys for YMCA by letter dated February 18, 2008, stated that the YMCA should receive the outgrant because: (a) Forsyth County has been given previous chances to lease the property and has refused, (b) Forsyth County’s claim to a right of first refusal does not apply since the Army must determine that such a lease to be in the public interest, (c) a previous court case found that the YMCA met the test of being generally open to public use, (d) the YMCA has the financial capacity and management capabilities to pursue the project, (e) the Forsyth County plan is simply a disingenuous effort to keep Bethel Park underutilized to appease local residents, (f) based on market research, the YMCA has the greater demand, and (g) the YMCA plan would serve a greater diversity of socioeconomic backgrounds whereas the Forsyth County plan would provide an amenity for the affluent.

Response: The comment states reasons for preferring one of the potential lessees over another. As stated in the EA, the objective of this evaluation is not to select a lessee for the property; rather, it is to evaluate impacts that could result from a leasing action to a non-Federal entity using as development examples those who have already provided development proposals. Discussion of legal case law and other legal issues are outside the scope of this evaluation and have been referred to Mobile District’s legal counsel for consideration. Because the comments did not address any issues relevant to the EA, no further response is provided.

Jarrard and Davis, attorneys for Forsyth County by letter dated February 19, 2008, stated an objection to the EA and to the YMCA plan because: (a) legally, preference over private interests must be given to local or State governments that request leases of Federal property, (b) the proposal to lease to YMCA will illegally restrict the general public’s use of the park, (c) the YMCA proposed sewer system is not legal in Forsyth County, (d) the YMCA will fail to meet minimum fire safety standards, (e) the YMCA plan will cause significant traffic problems, and (f) the YMCA plan will deplete the park’s natural habitat and environmental characteristics.

Response: The comment states reasons for preferring one of the potential lessees over another. As stated in the EA, the objective of this evaluation is not to select a lessee for the property; rather it is to evaluate impacts that could result from a leasing action to a non-Federal entity using as examples those who have already provided development proposals. Discussion of legal case law and other legal issues are outside the scope of this evaluation and have been referred to Mobile District’s legal counsel for consideration.

However, some of the issues raised by the commenter could apply to any lessee proposing to develop the park. Any of the alternatives associated with development of the park potentially would have restrictions placed on the public’s use, and is in accordance with the Master Plan to

develop the park for recreation-related uses. For example, overnight camping at the park is currently prohibited and use of vehicles in certain areas is restricted. In any development plan, designated use areas would be established. While such restrictions would exist, adequate existing-use space would continue to exist at the park, such as on the undeveloped northern peninsula, and in other areas of Lake Lanier designated for public use.

Regarding the adequacy and legality of the proposed YMCA sewage treatment facility, an e-mail request to the YMCA was made as described above, asking that a description be made as to how they would comply with County law and regulations. By e-mail response dated April 24, 2008, the YMCA stated that through the use of professional engineers they intend to fully comply with all requirements of the Federal Clean Water Act and the Georgia Water Quality Control Act. They also stated that they intend to comply with all technical design requirements of the Georgia Environmental Protection Division or Forsyth County through the Standard Specifications for Water Distribution and Sanitary Sewer Systems as issued by the Forsyth County Water and Sewer Department. They stated that they are currently unaware of any design deficiencies in their plan.

It is not the intent of this evaluation to insure that local and state laws and regulations will be followed by a specific potential lessee prior to determining the environmental impacts of leasing the property. Such compliance issues are deferred to the appropriate local or state agency. For example, it is unknown if either of the two proposals would comply with local code for wastewater treatment or fire safety standards; however, it is concluded that if such local code is complied with, environmental and human impacts would not be significant.

Results of traffic studies completed by both of the proposed lessees have indicated that traffic impacts would not be significant, although any plan, including the Corps' Master Plan that increases use of the park would likely increase traffic.

Any of the alternative plans to develop the park would result in changes and potentially minor adverse impacts to the park's natural habitat and environmental characteristics. Such impacts have been determined to be not significant.

Pro-YMCA. A total of 2,451 commenters stated a preference for the proposed YMCA plan. Reasons were given by many commenters and generally included proposed benefits to children and their physical and character development, pro-family values, the inclusivity and diversity of the YMCA, and Christian values. Many also claimed the facility would be of service to all persons of all incomes, and not to a select few. In addition, 186 laminated posters of artwork by elementary schoolchildren that had pro-YMCA subjects were provided.

Response: The comment states reasons for preferring one of the potential lessees over another. As stated in the EA, the objective of this evaluation is not to select a lessee for the property; rather it is to evaluate impacts that could result from a leasing action to a non-Federal entity using as examples those who have already provided development proposals. Because the comments did not address any issues relevant to the EA, no further response is provided.

Pro-Forsyth Co, with environmental concerns. A total of 2,066 commenters stated a preference for the proposed Forsyth County plan, providing a list of environmental concerns over the YMCA plan that the commenters claimed the Forsyth County plan would avoid. Each concern or alleged point stated in favor of the preference is discussed as follows:

(a) Federal regulations require the Corps to grant a preference to Forsyth County.

Response: This is a legal argument previously discussed for the comment provided by the attorneys for Forsyth County. Discussion of legal case law and other legal issues are outside the scope of this evaluation and have been referred to Mobile District's legal counsel for consideration.

(b) The EA fails to address the YMCA illegal sewage treatment plan.

Response: As stated in the response to the Forsyth County attorney's comments, it is not the intent of this evaluation to insure that local and state laws and regulations will be followed by a specific potential lessee prior to determining the environmental impacts of leasing the property. The YMCA has stated (see above) that it intends to comply with all Federal, State and local laws and regulations regarding waste water treatment. It is determined that if local codes are followed by any applicant, impacts would be minimal. Compliance with those codes is left to the local authorities.

(c) The EA fails to address losses in free or low-cost recreational opportunities resulting from closing of Mary Alice Park on Lake Lanier.

Response: Mary Alice Park is a park approximately six miles southwest of Bethel Park, for which a private development of a multi-story hotel and conference center has been proposed and evaluated in a Mobile District supplemental Environmental Assessment (USACE 2007). As a result of the development, public boat ramps and beaches would be relocated, with similar facilities being constructed in other nearby locations. Because similar facilities would be provided, there would be no net loss in free or low-cost recreational opportunities as stated by the commenter. A discussion of the Mary Alice Park development has been added to the cumulative impacts section of the EA.

(d) The EA fails to address traffic concerns regarding the YMCA proposal; traffic from the YMCA facility would be a public hazard and a nuisance.

Response: Traffic studies from both applicants were provided and the results evaluated in Section 5.11 above of the EA. The results of those studies indicated that traffic would not constitute a significant impact.

(e) The EA fails to adequately address noise and light pollution that would result from the YMCA facility. The study performed by the YMCA did not constitute a scientific study.

Response: Noise studies from both applicants were provided and the results evaluated in Section 5.12 above of the EA. A request for a response to the concern about the methodology of the noise study was sent to the YMCA with the request for response to comments. In the e-

mail dated April 24, 2008, the YMCA stated they had utilized a professional sound engineering firm that used scientific instruments to measure sound at various test locations at Bethel Park. The complete response is found in Appendix E and the following is a summary thereof. The noise study was conducted in two tests.

The first test included measuring the audibility of noise from a public address (PA) system. The response stated that the methodology for assessing audibility of low-level sound over distances is not standardized. However, previous studies especially in National Parks have used audibility or percentage of time audible of an observer while simultaneously taking sound level measurements. Existing background sound levels at Corps RV parks and campgrounds were sampled, as were YMCA camp programs and noise conditions. Then the sound contractor simulated sounds from the proposed camp by setting up a PA system to produce 90 decibels sound level measured at a distance of 50 feet. Results from the observers stations indicated that sound from the PA system ranged from “inaudible” to “just barely audible”.

The second test included a continuous, unattended sound level monitoring and spot checks to determine the range and sources of background noise. The YMCA stated that such Day-Night Noise Level monitoring is an accepted industry standard, as well as for Federal regulatory guidelines, for assessing noise impacts from existing sources over a 24-hour period or longer. The assessment can provide a general basis for determining acceptability of noise environments. Results of the study indicated that all measured levels of ambient background noise were significantly greater than those for the PA measurements. In addition, the results of the tests indicated that ambient background noise was largely dominated by watercraft sources. They stated that under their development proposal, public boating access would be restricted and that they would control their own boating activities in the vicinity of the park. They concluded that watercraft-related noise would be limited compared to other development proposals.

The YMCA noise study reached similar conclusions to those of the study independently performed by Forsyth County (Section 5.12). In the Forsyth County study, they concluded that the area is already subject to noise impacts related to the use of recreational vehicles such as boats, jet skis, etc. It also stated that the park has significant tree cover which would absorb noise from inside the park. Since a development of the magnitude proposed by the two existing applicants would result in similar sized total area developed (Table 2) and potentially cleared of vegetation, resulting noise impacts would be expected to be similar.

A request for a response to the commenter’s concern about light pollution was sent to the YMCA with the request for response to comments. In an e-mail dated April 24, 2008, the YMCA stated that they are aware of the potential for light pollution and have taken steps to ensure that all lighting shall be designed to prevent direct glare, light spillage, and interference with automotive, bicycle and pedestrian traffic on adjacent streets and properties. They stated that newer technologies have been developed to address the concerns of light pollution. Exterior pathway lighting would be directed towards the ground. Any tall pole lighting fixtures would include shields to minimize glare and light spillage. Special lighting required in the main assembly area for performances would be directed towards the performance area only. Except for required security lighting, camp lighting would be automatically controlled to shut off no later than 11:00 p.m.

(f) The YMCA has not been a good steward of its current lease at Camp Eagle on Lake Lanier.

Response: Comment noted.

(g) Decreases in visitation to Bethel Park, stated in the EA, are due to the Corps' removal of facilities, not less demand by the public.

Response: Comment noted.

(h) The YMCA facility will reduce greenspace. The facility would exacerbate the loss of contiguous habitat available for animals requiring large habitat areas, an impact and habitat requirement already noted in the EA.

Response: The loss of greenspace and habitat was already evaluated in the EA and considered to be a moderate adverse impact for any of the action alternatives. There would be no impact to species requiring large contiguous habitat since existing and continuing "urban sprawl" has already eliminated such habitat.

(i) The proposed lease to the YMCA will reduce availability and access to the public. The northern peninsula of Bethel Park is not readily accessible to the public and is in fact cut off by private property.

Response: The proposed land use was previously discussed in Section 5.7 of the EA and found to result in minor adverse impacts. Land use by both applicants includes similar sized developments, although different in nature. As stated in that section some of the facilities may be restricted by the non-federal entity or fees may be charged for use of some facilities. It is acknowledged there will be some restrictions in public use by such development. The proposed development of the park under any of the action alternatives, including the potential upgrades at Two Mile Park, would be consistent with the previously described trend towards development, and would be commensurate with the Corps Master Plan. Public access to the northern peninsula is permissible across Federally-owned property although a privately-owned pier is located on the shore.

In the e-mail dated April 24, 2008, the YMCA stated that keeping children safe would be central to all future public use of the camp, and that therefore there would be periods of time when public access would be restricted. They indicated that they would accommodate existing usage by the local community. Such usage may involve a check-in procedure and issuance of a guest pass, determination of a use schedule through face-to-face meetings and designation of areas for visitor use of picnic areas and trails. They also stated that the existing boat ramp would not be open to the public outside the YMCA. They stated they have committed \$160,000 to the Corps for improvements at Two Mile Creek boat launch facilities, which would include enhancements to existing facilities and construction of an additional boat launch to offset the closure of the Bethel Park boat ramp.

(j) The Forsyth County proposal would be a benefit to the general public.

Response: Comment noted.

(k) The park currently belongs to local residents who should be allowed to continue using for walking, walking dogs and enjoying nature. The Forsyth County plan would serve all people, not only a select few, who can afford the YMCA.

Response: Comment noted.

Public Space should be Preserved. A total of 71 commenters indicated a preference for preserving public space without clearly supporting either the Forsyth County or YMCA plan. Supporting statements given by commenters included: (a) Local residents need greenspace with open areas for children; therefore, the park should be kept open to all, (b) the park should be left as is and not developed, so that greenspace may be preserved, and, (c) the undeveloped park provided valuable wildlife habitat, loss of public access to boat ramps is not fair.

Response: The loss of greenspace and habitat was already evaluated in the EA and considered to be a moderate adverse impact for any of the action alternatives. The proposed land use was previously discussed in Section 5.7 of the EA and found to result in minor adverse impacts. Land use by both applicants includes similar sized developments, although different in nature. As stated in that section some of the facilities may be restricted by the non-federal entity or fees may be charged for use of some facilities. It is acknowledged there will be some restrictions in public use by such development. The proposed development of the park under any of the action alternatives, including the potential upgrades at Two Mile Park, would be consistent with the previously described trend towards development, and would be commensurate with the Corps Master Plan.

Against the YMCA. A total of 51 commenters stated a position against the YMCA plan without clearly supporting any particular alternative. Reasons cited included purported traffic impacts, denial of emergency vehicle access, the YMCA would not provide for additional facilities for children since it would result in the closure of a camp in Alabama, other YMCA camps have not been well run, loss of public access, children would not be safe near a lake with a lot of speed boats, and Forsyth County has previously requested the park.

Response: Traffic impacts have been previously discussed in the Pro-Forsyth County comment above and in Section 5.11 of the EA. Some of the traffic impacts cited by the commenter would not be caused strictly by a volume of vehicles using the local roads for travel; instead, such impacts would be potentially caused by parked cars blocking local roads while waiting for the camp to allow entrance. Likewise, limitation of access by emergency vehicles would occur only if local roads were actually blocked or impassable as a result of YMCA activities. Therefore a request to the YMCA as to how such blockages would be avoided was made in the general request discussed above at the beginning of Section 9. In a statement by the YMCA dated April 24, 2008, they stated that such conditions have only occurred at a YMCA camp in the north Georgia mountains where terrain does not allow for overflow parking. Other YMCA camps were cited where overflow parking has been provided and such problems have been avoided. The proposed YMCA camp would have adequate parking, according to the response and such traffic blockages would not occur.

Loss of public space has been previously addressed as for the preceding comment category, "Public space should be preserved".

Regarding safety of children around water, standard safety precautions would be followed for any of the alternatives. As stated in section 5.18 of the EA, strict implementation of safety measures would reduce risk for children, assuring no disproportionate risk.

Because the issue of water safety involving children would apply equally to any proposed lakeside development where children are allowed to swim would apply equally to any potential applicant for a lease of Bethel Park, the request for a response to the commenter's concerns was sent to both current applicants. In an e-mail dated April 24, 2008, the YMCA responded, stating that safety and risk is a major priority in their camp design. They stated that on-site observations have revealed no excessive boat traffic in the cove areas where camp programs would take place. They stated that water activities would take place in both a swimming pool and in beach area with marked swim areas located in a protected cove. They would seek to obtain a "slow, no wake zone" designation from the Corps and the Georgia Department of Natural Resources at the beach site, following all application procedures deemed appropriate by those entities. They stated that certified lifeguards would be present at the aquatic use areas to assure safety and that a control tower would be present at the waterfront. The control tower would be occupied by camp personnel who would use two-way radios to monitor and coordinate waterfront activities and watercraft movement, as well as monitor lifeguards on duty in designated swim areas. They stated that the system has been successfully used in other YMCA camp sites.

In an e-mail dated April 14, 2008, the Director of Forsyth County Parks and Recreation Department provided a statement that they have proposed swimming in designated areas which would be buoyed and roped off from boating traffic.

The issue raised regarding Forsyth County's request to lease the park has been previously addressed in the comment by the Forsyth County attorney and elsewhere in the coordination section.

No clear statement. A total of 43 commenters provided comments that stated no clear position, or an idea so general that it could not be related to the context of the EA. Examples of such comments include "maintaining the environment is essential for Georgia families, quality of life and life lessons for children" and "I think our children need to experience the outdoors when so much of what they do is inside" and "This would be an asset" and "Remember the children".

Response: The comments were noted and included with other comments.

Against RV parks. A total of 25 commenters stated they were against the construction of additional RV parks, and did not state a preference for any of the alternatives.

Response: Comments noted.

In favor of developing Bethel Park. Two commenters did not make specific comments on the EA or state a preferred alternative, but stated they were in favor of development of the park.

Response: Comments noted.

Miscellaneous comments. Several additional individual comments addressed specific concerns as follows:

One commenter stated that the YMCA traffic study is based on current traffic volumes and doesn't take into account projected growth. The commenter indicated that traffic is expected to double approximately by the year 2030. Also, there was concern that the study did not take into account the planned opening of a new high school on Jot em Down Road that would add to traffic congestion.

Another commenter similarly stated that traffic impacts caused by development of the park would be unacceptable.

Response: General traffic concerns have been previously addressed in this EA. Because the issue of traffic study projections based on future growth would apply equally to any potential applicant for a lease of Bethel Park, the request for a response to the commenter's concerns was sent to both current applicants. In an e-mail dated April 24, 2008, the YMCA responded, stating that their traffic study included a 3% yearly background growth rate until the year 2010. They stated that 2010 was used because standard industry practice for traffic impact studies is to evaluate future traffic based on the full occupancy year of the proposed use. In other words, projections in traffic increases were studied through the year that the YMCA camp would be fully developed. After that point traffic increases would be due to reasons other than that caused by the development of the park. The YMCA stated that the new high school would be planned for development in 2011. The school, according to the YMCA response, would be located off highway 369 and Jot em Down Road and Highway 369 is a major highway capable of handling heavy commuter traffic and peak traffic which may occur as a result of the new school. They stated that their projections demonstrate no significant impact on area traffic. They also stated that Forsyth County Schools are open and generate significant traffic from August through May, and that the proposed YMCA programs would generate very little traffic during this time. Most of the planned use by the YMCA of Bethel Park would take place during summer months when public schools are closed.

In an e-mail dated April 14, 2008, the Director of Forsyth County Parks and Recreation Department provided a statement from their consulting engineer, MACTEC Engineering and Consulting, Inc. In their response, they referred to their original traffic study (Section 5.11 above) which accounted for traffic increases through the year 2030. They also stated that the proposed development of Bethel Park would include multiple use areas comprising varied traffic patterns. They stated that much of the generated traffic would be during off-peak hours and on weekends, which would have lesser impacts than if it occurred during peak hours. They stated that they were unaware of the plans for the high school and therefore did not include it in the traffic analysis. They stated that they would need to know the size and location of the proposed school to further evaluate it in the traffic study.

For both of the proposed developments, traffic studies that have been provided include future traffic growth. Such development-induced traffic impacts were considered and in the case of the YMCA proposal, included the impacts of the high school traffic. For both proposals, because of the location of the planned high school and the peak traffic times of the school and the park use, which would not coincide, there would be no significant additive traffic impacts. Both proposals represent the typical type of traffic impacts which could occur as a result of development of the park, either according to the Corps Master Plan or by a non-Federal entity, include projections of traffic growth, and constitute a non-significant adverse impact.

One commenter stated that a “high-end” RV resort would require expensive infrastructure such as a pool, concrete pads, cable television, etc. and that he was worried that there already exists too much competition to support such a facility. The commenter recommended that a fully detailed business plan be presented and verified.

Response: Although the overall nature of development proposed by different applicants has been evaluated, the competitiveness of the business model considered by each of the plans is beyond the scope of this evaluation. Such evaluation from a business perspective may be considered by other Corps elements when considering individual lease applications, as part of routine investigations as to whether a particular development would be of benefit to the Federal Government.

One commenter stated that they desire to see local participation involved that would allow both proposed uses to take place.

Response: Comment noted.

One commenter stated that proposed development at the park would deny a local church the use of the park and its lake access as a baptismal pool, which has been a long standing traditional use by the church.

Response: In an e-mail dated April 24, 2008, the YMCA responded, stating that they would allow use of the lakefront and other amenities for baptisms and church functions such as weddings, retreats, etc. They stated that YMCA’s are currently available for use by religious institutions who desire to use aquatic facilities for baptisms, and that requests would only need to be submitted to the camp administrative offices to assure scheduling conflicts would not occur between other programs, the sacred nature of baptism, and privacy considerations.

In an e-mail dated April 14, 2008, the Director of Forsyth County Parks and Recreation Department stated, “The county will work with the Church...” and “In regards to question A, if the County allows it now at the public beach, why would it not be allowed in the future at the public beach?”

It appears that both proposed plans for development would continue to allow the use of the park for baptisms, and that such use would not be impacted.

One commenter stated opposition to use of taxpayer’s property for private use.

Response: There is no general prohibition by law or regulation that prohibits leasing Federal property to non-Federal or private interests. In the current instance, leasing to a non-Federal entity would result in development of the park in a manner compatible with Federally-owned outdoor recreational uses around Lake Lanier. As stated in Section 1.4 of this EA, the primary purpose of leasing such facilities to non-Federal entities is to obtain recreational facilities at little or no cost to the Federal Government. The main consideration of such leases is to develop, operate and maintain the leased property for the benefit of the United States and the general public.

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