



United States Department of the Interior

National Park Service
Chattahoochee River
National Recreation Area
1978 Island Ford Parkway
Sandy Springs, GA 30350



IN REPLY REFER TO:

L7619 (CHAT)

March 21, 2013

Bradford Townsend, AICP
Planning and Zoning Director
Roswell Planning and Zoning division
38 Hill Street, Suite G-30
Roswell, GA 30075

Dear Mr. Townsend:

This letter is in response to the request for a variance to encroach within the stream buffer for the City of Roswell, Stream Buffer Variance #201300500, 900 Myrtle Street, Land Lot 425, AEC/Steven Rowe. The Chattahoochee River National Recreation Area, a unit of the National Park Service (NPS), was established by Congress in 1978 to assure the preservation and protection of a 48-mile stretch of the Chattahoochee River from Buford Dam to Peachtree Creek. In addition to the park, Chapter 21.1 of the Roswell Zoning Ordinance Code, Tributary Protection, states that the purpose and intent of this chapter is to "comply with the requirements of O.C.G.A. § 12-5-453(a), the Metropolitan Protection Act, to comply with requirements of the Rules for Environmental Planning Criteria relative to water supply watersheds as specified by the rules of the Georgia Department of Natural Resources, Environmental Protection Division."

The project applicant seeks a stream buffer variance for the purpose of constructing a residential development within the Groveway Overlay District. Land Lot 425 includes both a perennial and a flowing stream. The perennial stream, Hog Wallow Creek, is a tributary of Big Creek, which makes up a large part of the boundary of the Vickery Creek unit of Chattahoochee River National Recreation Area. We are concerned that this project could cause impacts to park resources if proper Best Management Practices (BMPs) to protect the streams from erosion and sedimentation are not followed and enforced.

Currently, Hog Wallow Creek, is listed in Georgia's 2012 305(b)/303(d) List of Waters for not supporting designated uses due to fecal coliform caused by urban run-off. The Big Creek watershed, which includes Hog Wallow Creek, is also state-listed for not meeting its designated uses due to fecal coliform caused by urban run-off. In light of the fact that this is the first of many stream buffer variance applications related to the city of Roswell's redevelopment, the practiced use of sustainable methods to protect the streams and other bodies of water from run-off would limit further degradation to this impaired watershed. Best Management Practices (BMPs) should be designed and implemented to comply with the standards and specifications

outlined in the *Manual for Erosion and Sediment Control in Georgia* (Georgia Soil and Water Conservation Commission, 2002). An approved erosion and sedimentation control plan should be implemented before soil disturbances occur within the project site to avoid violating the Erosion and Sedimentation Act of 1975. To prevent the introduction of exotic, invasive plant species into the watershed and river corridor, all re-vegetation should be carried out using native tree and plant species and native seed mixes.

We appreciate your consideration of these comments. Please feel free to contact park's Natural Resources Program Manager, Paula Capece, directly if you feel that the scope of the project may require NPS concurrence or permitting or if you have any questions or concerns that we could help to address. She can be reached at 678-538-1322 or by email at Paula_Capece@nps.gov.

Thank you,

A handwritten signature in blue ink, reading "Tim Bemisderfer", followed by a horizontal line extending to the right.

Tim Bemisderfer
Acting Chief, Planning and Resource Management
(678)538-1321