

Coastal Office
428 Bull Street, Suite 210
Savannah, GA 31401
tel 912.447.5910
fax 912.447.0704
coastal@gaconservancy.org
georgiaconservancy.org



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Via portal: <https://parkplanning.nps.gov/OcmulgeeRiver>

National Park Service, Denver Service Center
Attn: Ocmulgee River Corridor SRS, Mr. Chuck Lawson
12795 West Alameda Parkway, PO Box 25287
Denver, CO 80225-0287

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RE: Georgia Conservancy Comments for Ocmulgee River Corridor Special Resource Study (SRS), National Park Service (NPS)

Dear Mr. Lawson:

The Georgia Conservancy is pleased to provide comments for the Ocmulgee River Corridor SRS. This project represents a unique cultural and environmental opportunity for the people of Georgia and our nation as a whole. We want to express our profound support for the vision and benefits of a park and preserve in the study area.

Founded in 1967, the Georgia Conservancy is one of Georgia's oldest nonprofit conservation organizations. The Georgia Conservancy operates statewide with a goal to develop practical solutions for protecting Georgia's environment. We establish policy decisions under a vision statement that seeks to cultivate *a Georgia where all people and the environment thrive*.

It is hard to overstate the legacy benefits to middle Georgia's cultural history and environment brought by the Ocmulgee River Corridor SRS. The Ocmulgee River has been home to a variety of residents for centuries. The river has given and continues to provide residents with a sense of place in middle Georgia and the southeastern United States thanks to its rich natural and cultural history.

The Ocmulgee River's significance as a natural resource extends far beyond its scenic beauty. It supports several outdoor recreation activities and serves as a vital supply of drinking water. It also flows alongside an abundance of historically-significant treasures, including internationally-recognized archeological remains and the most extensive collection of National Register of Historic Places listings in the state of Georgia.

This project presents a singular opportunity to permanently protect the region's cultural and ecological heritage. The effort has received strong support from the Ocmulgee National Park and Preserve Initiative (ONPPI), a local organization which seeks to protect and educate the public on the cultural, ecological, and recreational opportunities for this corridor at the center of our state. ONPPI has brought together a host of diverse stakeholders who have worked for over ten years to protect and promote the river. This group and its hundreds of constituents

and stakeholders are poised to assist this Park and Preserve through to its completion.

This letter addresses *four topic areas* listed in the NPS Project Portal (linked above):

Which sites, resources, and value from the river corridor study area do you believe are most important?

The Georgia Conservancy believes the study area's cultural history is the most important aspect of the corridor. A primary focus of the Special Resource Study should include weaving the corridor's history into a coherent cultural narrative that accentuates the legacy of Native American habitation. One aspect of the corridor's cultural heritage is a legacy of how humanity and the ecology of a place may both prosper. The prolific culture on the Macon Plateau and along the Ocmulgee River represents sustainable development of the Fall Line ecosystem by Native Americans for thousands of years. For the southeastern U.S., we question if a similar intact landscape exists.

While the Mississippian culture of the Macon Plateau waned after AD 1200, other towns flourished, including sites down the Ocmulgee River, further into the SRS Study Corridor. The expansion of the Ocmulgee Park boundary, already legislatively authorized at the federal level, will bring Lamar Mounds, a notable heritage site, into the park boundary. Previously, Lamar Mounds was protected under the Ocmulgee National Monument, but it was not contiguous with the rest of the protected land. Indicative of this site's significance, the Lamar culture, named for the Macon location, was prevalent in Georgia and parts of other states and was characterized by fortified towns surrounded by agricultural fields. People built mounds as bases for temples inside stockades of upright logs.

There are also conservation efforts underway that will preserve Brown's Mount, an important cultural site adjacent to Bond Swamp National Wildlife Refuge. Together, these point to a growing recognition of this cultural landscape.

The Cultural Context Report and the Environmental Context Reports, included in this SRS comment announcement, do an admirable job of synthesizing thousands of years of habitation into a cultural landscape narrative with an imperative for conservation.

Beyond the cultural heritage components of the project, the study area consists of a unique fall line geography and ecology with species of concern. The corridor has been a focus for Georgia state conservation efforts, as shown in our well-regarded 2015 State Wildlife Action Plan (SWAP), which highlights this landscape. The local land trust, Ocmulgee Land Trust, has been conserving tracts that fit into the jigsaw puzzle, hoping to one day provide ecological connectivity, game corridors, and other benefits for the study area. Notably, Bond Swamp (USFWS), various State of Georgia properties (Oakly Woods, etc.) are adjacent to and part of the study area.

Concurrent with this study, Robins Air Force Base is also undertaking an update to its Joint Land Use Study (JLUS) that can further weave together a coherent plan for the corridor use. The Georgia Conservancy is not aware of a precedent in our state's history for two such notable federal land use studies (NPS SRS and the DoD (Robins) JLUS) being undertaken simultaneously in the same landscape of conservation interest.

In the river corridor study area what activities, and experiences are most important to you? What types of activities and experiences would you like to see available in the study area?

We share a vision with our ONPPI collaborators, in which a mosaic of lands, some publicly accessible and some with private rights retained, are managed in a coordinated manner that emphasizes conservation, recreation, cultural recognition, and ecological restoration. Central to this vision would be continued permission for hunting and fishing, along with working lands (agriculture and forestry).

Recreation in this corridor, especially excursions on the river, is very important to Georgia Conservancy's Stewardship Program. Our outings from Dykes Landing south to Hawkinsville have been part of our recent annual schedule. During the last few years, the Georgia Conservancy has led groups on different sections of the river and plans are in place to continue these stewardship trips to help raise awareness of this important recreation area of the state.

The Knight Foundation-funded report, "Diamond in the Rough: An Economic Analysis of the Proposed Ocmulgee National Park and Preserve," referred to a six-fold increase in visitation within 15 years and an additional \$206.7 million in annual economic activity. Most of this economic activity (the Knight report cites 90 percent) would come from increases in visitor spending at businesses in local communities, including restaurants, hotels, motels, etc. It would be prudent to focus this opportunity on the rural counties and small towns along and near the corridor.

During the last few years, there has been a dramatic growth in off-road cycling, representing one of the growing forms of recreation that use resources already in place. Camping, bicycling, fishing, and hunting have all seen a boom in equipment sales and public land use during the COVID-19 pandemic.

What is your vision for the Ocmulgee River Corridor, and how would you like to see the area managed?

This corridor is an underutilized resource that has been discussed as a landscape of interest for wildlife enthusiasts since the end of World War II, when the *Macon Telegraph* published an article that mentioned the concept of a large game park of similar footprint in the current landscape under consideration.

The Georgia Conservancy's vision builds on this legacy. We envision the corridor as a mix of private, state, and federal lands managed at the local level for a wide range of uses. A National Park and Preserve is a new conservation tool not previously used in Georgia. Thus, it is recommended that NPS consider a management scheme that would emulate the successful mix of uses in our Wildlife Management Areas (WMAs) or State Parks/Historical Sites. Such a structure would be nimble enough to incorporate the management goals of each property owner.

Many of the state lands allow game hunting while being managed to protect cultural and non-game species. This management scheme has taken on additional sophistication with the recent expansion of conservation lands to protect the gopher tortoise, a keystone species in central and south Georgia's ecological landscape. This initiative has resulted in the designation of new WMA lands, totaling over 70,000 acres. While GT conservation is not a primary aim of this corridor, conservation easements of similar construction could be established to protect bear habitat or cultural resources. These easements could be held through public agencies (DNR) or private nonprofits (land trusts).

Private nonprofit organizations bring a range of resources and innovation to conservation. Ocmulgee Land Trust is a notable local partner; they have led conservation efforts for years in this landscape with collaboration from The Nature Conservancy and Open Space Institute.

One alternative for management on portions of the corridor might include a self-managing property owners cooperative, which puts the property owners in charge of managing their land. There are good examples of similar projects across the U.S. Here in Georgia, a notable example is Little Cumberland Island, inside the NPS Cumberland Island National Seashore boundary. Little Cumberland Island property owners have managed their property for over forty-five years using conservation guidelines agreed to with the Department of Interior (DOI), with minimal federal input.

Are there other concerns that the National Park Service should be aware of while the study progresses?

As stated above, this SRS corridor presents a unique opportunity for Georgia (and perhaps nationally) to increase understanding and raise awareness of the Ocmulgee River and the adjacent cultural and natural resources. By preserving this 50-mile 80,000-acre area, this rare project addresses all five of the conservation values stated by the State of Georgia (O.C.G.A. § 48-7-29.12, Georgia Conservation Tax Credit). These values are to protect and conserve:

- Water resources and wetlands
- Natural habitats for wildlife and plants
- Working lands, including agricultural lands and forests
- Outdoor recreation areas
- Outdoor cultural heritage sites

Additionally, Robins Air Force Base presents a compelling opportunity to tie this Ocmulgee Corridor Project with the Georgia Sentinel Landscape (GSL) (<https://sentinellandscapes.org/landscapes/georgia/>) and with other state and federal conservation priorities. Georgia Sentinel Landscape is one of seven federally designated Sentinel Landscapes nationwide. The Sentinel Landscape program was founded by the Department of Interior, Department of Defense, and Department of Agriculture. The partnership's mission is to strengthen military readiness, conserve natural resources, bolster agricultural and forestry economies, and increase climate change resilience. Federal designation of sentinel landscape is a formal recognition between the parties of the landscape's national significance to accomplish these goals.

GSL objectives align well with the Ocmulgee River Corridor SRS goals and represent another layer of opportunity for the NPS to leverage a partnership that is already in place. GSL projects are typically beneficial to multiple agencies and serve landscape conservation objectives. The Georgia Conservancy is a committed partner with GSL and would support further NPS engagement in this landscape.

Please let us know if Georgia Conservancy may be of assistance in any manner in your efforts.

Thank you very much for your consideration.

Sincerely,



Charles H. McMillan, III
Natural Resources Director
Georgia Conservancy



Katherine Moore
President
Georgia Conservancy