

R.S. Webb & Associates

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January 15, 2018

Mr. Matt Windom
Carroll County Water Authority
P.O. Box 739
Carrollton, Georgia 30112

**Subject: Transmittal of Phase I/II Cultural Resources Reports
Proposed Indian Creek Water Supply Reservoir Project
Revised Normal Pool Elevation (1,161 Feet AMSL)
Carroll County, Georgia
R.S. Webb & Associates No. 17-005-010
USACE Permit Application No. SAS-2009-00042**

Dear Mr. Windom:

It is our understanding that due to revised water demand estimates, the Carroll County Water Authority has reduced the normal pool elevation for the proposed Indian Creek water supply reservoir from 1,195 feet Above Mean Sea Level (AMSL) (748 acres) to 1,161 feet AMSL (480 acres) (Figure 1). In 2008, R.S. Webb & Associates (RSWA) conducted a Phase I cultural resources survey of the reservoir impoundment at the original normal pool of 1,195 feet MSL and recorded 33 archeological sites. Thereafter, Phase II evaluations were conducted at five prehistoric sites in 2014 and 2015; all were recommended ineligible for the National Register of Historic Placers (NRHP). In an email dated October 13, 2015 (attached) from David Crampton (Corps Archeologist) to Andrea Gray (Andrea P. Gray, LLC), Mr. Crampton agreed that the Indian Creek reservoir project, as originally proposed, would affect no properties eligible for or listed in the NRHP; at that point, Section 106 consultation effectively ended.

Figure 1 shows that the newly proposed 34-foot reduction in the impoundment pool elevation would affect as many as nine fewer archeological resources than the reservoir at the 1,195-foot elevation. More importantly, the U.S. Army Corps of Engineers and the State Historic Preservation Office agreed that none of the sites recorded during the original survey meet NRHP eligibility criteria. Based on the above, we see no reason to expend additional County funds to rewrite the Phase I/II study reports to accommodate the reduced reservoir pool elevation. RSWA recommends sending the attached RSWA Phase I/II cultural resources reports, and the October 13 email, to the Corps as proof that the Section 106 process for the original and reduced elevation designs has been successfully completed:

1) *Phase I Cultural Resources Survey of the Proposed Indian Creek Reservoir
Carroll County, Georgia, dated March 12, 2012;*

2) *Phase II Evaluations Archeological Sites 9CL368, 9CL382, 9CL384, 9CL386, and 9CL400 Indian Creek Water Supply Reservoir Carroll County, Georgia*, dated September 30, 2015;

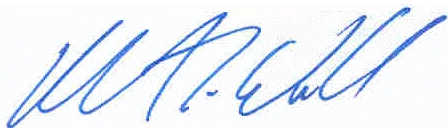
3) *Addendum Report of Findings Additional Phase II Evaluation at Archeological Site 9CL384 Proposed Indian Creek Water Supply Reservoir Site Carroll County, Georgia*, dated September 17, 2015; and

4) Email dated October 13, 2015 from David Crampton (Corps Archeologist) to Andrea Gray (Andrea P. Gray, LLC).

Since the Phase I survey was conducted in 2008, RSWA revisited the project vicinity to determine if there are structures/properties within the project Area of Potential Effects that are now at least 50 years and eligible for NRHP eligibility evaluation. No such structures are located within the revised impoundment APE; in fact, due to the revised (lower) impoundment elevation, the impoundment APE is less of an intrusion than originally proposed. One possible historic resource is Teague Lake, which is located within the revised impoundment. An easement was granted to Carroll County to construct Teague Lake Dam in September 1967 and aerial photography shows that the lake was in place by 1975. However, the date the Teague Lake project was completed (i.e., impoundment clearing and dam construction completed) is not clear. Whatever the case, RSWA does not consider Teague Lake eligible for the NRHP because such middle to late middle 20th century lakes are quite common in the Georgia Piedmont and there is nothing remarkable about its construction.

Mr. Windom, we appreciate the opportunity to work with the Carroll County Water Authority on this project. If you have any questions or comments concerning our proposal please contact Mr. Steve Webb at 770-345-0706.

Sincerely,
R.S. WEBB & ASSOCIATES



Robert S. (Steve) Webb
President and Senior Principal Archeologist

Enclosures: Figure 1 Project Map
Three RSWA Cultural Resources Study Reports
October 13, 2015 Email