

Grindstaff, Mark

From: Richard Cloues [Richard_Cloues@dnr.state.ga.us]
Sent: Wednesday, December 24, 2003 3:38 PM
To: Mark.Grindstaff@dot.state.ga.us
Cc: Elizabeth Shirk; Ray Luce; Rowe.Bowen@dot.state.ga.us
Subject: Fort Attaway mitigation report (HP010514-001, PI 620590)

Mark--

We are in the process of reviewing your narrative report on Fort Attaway in Rome. I am sure you will not be surprised to learn that this is among the most complex mitigation reports I have ever seen in terms of the extent of research, the variety of sources, and the number of contending interpretations of the resource.

I'm writing to let you know that the report is under active review but that for these reasons it is going to take us longer than the usual 30 days to complete our review and forward our comments. Also, we have heard from some of the local interest groups who have indicated that they are going to submit "rebuttals" to us during the 30-day review period, although we have not yet received anything in writing (have you received anything?), and we believe it will be appropriate for us to review or at least acknowledge these responses if they are presented to us in a timely manner.

In light of the many issues your report raises, we believe it may be necessary to attempt to resolve them before the MOA stipulation is fully satisfied. One approach might be to amend your report in light of any new information or interpretations, if you as the principal research/author think this would be appropriate; another approach might be to bundle the responses along with your report, with or without a rejoinder from you (your call) addressing any issues raised by the responses; a third approach, of course, might be to simply acknowledge the responses and let your report stand.

We appreciate the level of effort you have put into this mitigation report, and we look forward to working with you to satisfy this MOA stipulation.

Richard Cloues
Survey and Register Unit Manager
Deputy State Historic Preservation Officer
Historic Preservation Division
Georgia Department of Natural Resources
156 Trinity Avenue, S.W., Suite 101
Atlanta, GA 30303-3600

404-651-5983

2 pages

From: Richard Cloues
To: "Mark.Grindstaff@dot.state.ga.us".GWNOGWIA.GWNO-DO
Date: 6/18/02 10:44AM
Subject: RE: Fort Attaway

Mark--

We have been discussing Ft. Attaway at some length.

It is the consensus of the staff that the fort should be considered eligible as both an archaeological site and a historic structure associated with the defense of Rome during the Civil War. This would make it significant under Criterion A and D and possibly C.

With regard to its integrity as a historic structure, although it is overgrown and eroded, it is still intact enough to be identifiable as a historic fortification, and it appears to be as intact as other small Civil War fortifications that have been considered eligible or listed in the National Register outside of state or national historic sites (for example, Johnston's Line in Cobb County). One question that came up in this regard is whether there was once more to this fortification than now exists, perhaps under the driveway or parking lot of the restaurant or further south along the slope of the hill, that has not been documented historically or examined in the field because of its distance from the project--this might be something you would want to look into, but I'm not sure that it would make much difference regarding the eligibility of what's left.



Regarding boundaries, there are two points of view, one based on the archaeology of the site, the other based on geography, historical functions and activities, and visual factors. The archaeology seems pretty well documented (although as you know the property owner is pursuing a National Register nomination which may involve additional archaeology). With regard to the boundaries of the fort as a historic structure, we're taking our cue from the National Register bulletin on battlefields which directs that boundaries for military sites should encompass an "appropriate" physical setting that reflects the local geography and shows how the geography influenced the siting of the fortification (on the edge of a hill, overlooking a valley) and the events associated with it ("take the hill"). With this in mind, and based on the information at hand, we believe it would be appropriate to extend the boundaries at least to the railroad on the north and the highway and/or quarry to the east (we are uncertain as to whether the quarry constitutes an intrusion into the setting of the fort and whether it should therefore be excluded). We are open to alternative boundary suggestions, of course, but they should be justified in terms of the general guidance suggested by the National Register.

Regarding effects: Based on the information submitted to date, we agree that there will be no adverse effects to known archaeological resources associated with the fort. But we believe it is appropriate for you to assess effects to the fort as a historic structure as well, taking into account the extent of the fort and its historic setting.

Again, we understand that the property owner has retained a consultant to prepare a National Register nomination for the fort. It may be prudent to confer with the owner's consultant (or at least ask) to determine what if any new information or analysis will be presented and how that might be factored into your Section 106 compliance.

As always, let us know what you think, and let us know if you want to get together again to discuss the matter.

Richard Cloues
Deputy State Historic Preservation Officer
Historic Preservation Division
156 Trinity Avenue, S.W., Suite 101
Atlanta, GA 30303-3600