

Chatham Area Transit Downtown Intermodal Terminal Savannah, GA

Revised Finding of No Significant Impact (FONSI)

Chatham Area Transit Authority

For the:

U.S. Department of Transportation

Federal Transit Administration

December 2011

The Federal Transit Administration (FTA) has determined in accordance with 23 C.F.R. 771.121, 49 U.S.C. Section 303 (formerly Section 4(f) of the Department of Transportation Act of 1966), Section 106 of the National Historic Preservation Act of 1966 under the revised 36 CFR Part 800 regulation, and other applicable environmental laws, regulations, that a proposed change in scope to the Downtown Intermodal Terminal Project (Project) in Savannah, Georgia, will have no significant impacts on the environment. FTA previously executed a Finding of No Significant Impact on the Project on September 18, 2008.

A Revised Finding of No Significant Impact (Revised FONSI) is based on the Chatham Area Transit Environmental Assessment (EA), a Finding of No Significant Impact (FONSI) originally issued by FTA on September 18, 2008, and on the evaluation of a design modification to the Project. Other than the changes addressed or incorporated in the Revised FONSI, all of the previous findings and determinations, including all supporting documentation, in the EA and the FONSI issued on September 18, 2008, remain unchanged and are hereby incorporated by reference. The EA and the documents which have been reviewed and evaluated for the proposed change in scope to the Project have been determined by FTA to accurately discuss and address the project purpose and need, environmental issues, reasonably foreseeable impacts associated with the implementation of the proposed Project, and appropriate mitigation measures to minimize harm. These documents provide sufficient evidence and analysis for determining that an Environmental Impact Statement is not required for the Project.

Introduction

The Federal Transit Administration (FTA) served as lead federal agency under the National Environmental Policy Act (NEPA) for the proposed Project. The Chatham Area Transit Authority (CAT) prepared a Revised FONSI in accordance with 42 USC Section 4321 et seq., FTA's implementing NEPA regulation, 23 CFR Part 771, including the U.S. Department of Transportation's Section 4(f) regulation, 23 C.F.R. Part 774. The proposed action was originally evaluated in a EA in 2008 and a FONSI was issued by the FTA on September 18, 2008. The action evaluated in the EA proposed a demolition of the existing Greyhound Station to accommodate a combination of both CAT's and Greyhound's program requirements, which was not feasible as designed due to limited space for expansion within the existing one-story facility. The current project scope has been changed and a redesign of the Project now keeps the existing single story Greyhound Station.

Due to adverse impacts and an unavoidable permanent transportation use of the Greyhound Station, a historic property considered eligible for the National Register of Historic Places (NRHP) pursuant to 36 CFR Part 800.4(d)(1), a Section 4(f) re-evaluation was conducted in accordance with the requirements of 23 CFR Part 774. Additionally, a conditional "No Adverse Effect" determination was made for the Thunderbird Inn, a NRHP eligible property within the Area of Potential Effect (APE). The FTA, CATA, and the Georgia Historic Preservation Division (HPD), entered into a Section 106 Memorandum of Agreement (MOA) that was executed on October 21, 2008. The signatories to the MOA developed a series of stipulations that were included as mitigation measures/environmental commitments of the original FONSI. The impact analysis associated with the current change in scope for the project and the lessening of the reasonably foreseeable adverse effects to eligible historic resources resulted in a need for an amendment to the MOA. An amended MOA with the original signatories was executed on September 7, 2011. The stipulations contained in the amended MOA are attached to the Revised FONSI as mitigation measures/environmental commitments.

An adjustment in program requirements for the intermodal terminal currently allows for a renovation of the existing facility to accommodate both CAT and Greyhound. The current design proposal includes using the existing Greyhound Station structure and preserving the external elements that contribute to its eligibility for listing in the NRHP. No significant changes to the existing footprint for the Greyhound Station would occur as a result of project implementation. The viewshed of the APE would remain relatively intact, except for the addition of bus canopies on the east side of the site. A reevaluation of effects was requested from the FTA in consultation with the Georgia State Historic Preservation Office (SHPO) based on the modified project proposal. FTA, in consultation with the SHPO, determined that there would be an adverse effect to the Greyhound Station and the Thunderbird Inn, where previously a conditional "No Adverse Effect" determination was made for the Thunderbird Inn. The treatment of these resources in respect of this determination is outlined in the amended MOA executed on September 7, 2011.

Proposed Change in Project

The proposed change in the project consists of the construction of a Downtown Intermodal Terminal for bus operations in Savannah, Georgia. The facility will be constructed in an existing transportation building that currently is used by the Greyhound Bus Service. The building will be renovated to allow for joint operations of both the local transit system operated by CAT as well as the intercity transit system operated by Greyhound. The purpose for construction of the Downtown Intermodal Terminal is to centralize bus operations, improve system linkage and accessibility, improve customer service and safety, reduce congestion, improve air quality, and provide administrative office space. The design plans for the CAT Intermodal Terminal have been adapted to keep the existing single story Greyhound Station in its current state with added bus canopies on the east side of the proposed project site. The interior of the building will be renovated to allow for joint Greyhound and CAT operations.

Alternatives Considered

A site selection study was conducted to identify available sites that would meet the project need and purpose, and two potential sites were identified: the Greyhound Station site on Oglethorpe Avenue (Greyhound site) and an undeveloped site at the corner of Louisville Road and W. Boundary Street (Louisville Road site). The two Build alternative sites and a No-build alternative were evaluated in the Environmental Assessment (EA).

Under the No-build alternative, CAT would not construct an intermodal terminal in or near the downtown Savannah area. Buses would continue to use existing routes and transfer locations. The selection of the No-build alternative would not necessarily preclude use of shuttles or other non-capital intensive means to provide connections between existing transportation terminals or stations. This alternative would not meet the purpose and need for the project.

Of the two build alternatives, the Greyhound Site was selected as the Locally Preferred Alternative (LPA) based on a comparison of environmental impacts, engineering criteria and constructability, scoring of the alternatives by the Citizens Advisory Committee, and comments received during the comment period. The Greyhound Site alternative is the most effective in meeting the purpose and need for the proposed CAT Downtown Intermodal Terminal. The LPA minimizes overall impacts, enhances transit operations, and maximizes the cost effectiveness and efficiency of the transportation investment.

The Greyhound site is located on the block bound by W. Oglethorpe Avenue, Fahm Street, W. Youmans Street, and Ann Street. The site is approximately two acres and is currently occupied by the existing Greyhound Station. Conceptual plans have been developed for the site, which is proposed to be developed to accommodate both CAT buses as well as Greyhound buses. The original project design for the CAT Intermodal Terminal called for the demolition of the current single-story building located at the existing Greyhound site and replacement with a two-story facility due to limited space for expansion. The project design has been adapted to keep the current one-story building and renovate the building to accommodate the CAT Intermodal Terminal.

The Louisville Road site is located at West Boundary Street and Louisville Road and is approximately 4.3 acres of vacant land. The property was determined to be contaminated with hazardous materials likely originating from use associated with an abandoned railroad bed and rail spur on the property. The time and cost of remediating this site for the proposed project would not be feasible.

Public Involvement

Opportunities for participation were provided to the public, stakeholders, and agencies in the development of the CAT Downtown Intermodal Terminal project. A Citizen's Advisory Committee was established as part of the site selection study to include public participation in the site selection process. Multiple meetings and workshops were held from April to September 2007. A meeting was held on February 7, 2008, to provide the public an opportunity to comment on the two proposed site locations in terms of recommending a Locally Preferred Alternative. Attendees included members of the Citizens Advisory Committee, members of the Downtown Master Planning Committee, and interested city and county officials.

The official formal public comment period for the Draft EA/Section 4(f) Evaluation was from June 8, 2008, to July 11, 2008. A Notice of Availability (NOA) was published in the Savannah Morning News on Sunday, June 8, 2008, and the document was available for review for 30 days at the CAT office, at the main branch of the public library, and on the internet at . The public hearing was held on Thursday, June 26, 2008, from 5:00 to 7:00 p.m. in the Commission meeting room at the Old Chatham County Courthouse. The hearing was advertised in the Savannah Morning News in the NOA on June 8, 2008, and in a second notice published the day of the hearing.

Seven people attended the hearing, and one comment was received. The comment was in support of the project and favored the Greyhound site as the Locally Preferred Alternative; the comment resulted in no necessary changes to the text of the EA/Section 4(f) Evaluation. No other public or agency comments were received.

Agency Coordination

Continuous agency coordination occurred throughout development of the project. An early coordination letter was sent to federal, state, regional, and local agencies on April 20, 2007. The letter described the proposed action and requested that agencies provide their comments and concerns regarding any potential environmental impacts of the proposed action that might require analysis. All comments received were carefully considered in the development of the project. The early coordination letter was also used to encourage participation in Section 106 process. Potential consulting parties identified for the project included the Georgia SHPO, City of Savannah, Chatham County Commission, the Savannah-Chatham County MPC, and the Historic Savannah Foundation. The revised project conceptual plans were reviewed by the Savannah-Chatham Historic Review Board for local consistency and were also reviewed by the Georgia Historic Preservation Division for concurrence.

Environmental Consequences/Findings

The Downtown Intermodal Terminal EA thoroughly investigated the environmental consequences associated with the proposed action. The EA addresses project compliance with all applicable statutory, regulatory and federal requirements, including Section 106, Section 4(f), Air Quality Conformity, and Environmental Justice. The following resource categories were thoroughly investigated and were determined **not** to be substantially affected through implementation of the proposed action: zoning and land use, residential and community resources, visual aesthetic resources, demographic characteristics, political jurisdictions, pedestrian movements, traffic, water resources, public services, safety and security, noise and vibration, vegetation and wildlife, environmental justice, construction, air quality, geology and soils, utility disruptions, and cumulative impacts.

The following two resources categories were thoroughly investigated and found to be potentially affected through implementation of the proposed action. Of those areas with potential or identified impacts, all of these will be mitigated as outlined in the following paragraphs.

Historic and Archaeological Resources

The proposed project would result in the renovation of the existing Greyhound Station, which has been determined eligible for listing on the National Register of Historic Places (NRHP) and placed on the local Historic Properties list. According to the State Historic Preservation Officer, (SHPO) in a letter dated May 5, 2011, the planned renovation of the interior of the building is an adverse effect to the eligible property and the addition of the canopies to the eastern portion of the site would be considered a visual impact, resulting in an adverse effect to the Thunderbird Inn.

Through further coordination with the Georgia SHPO during the Section 106 consultation process, the preparation of a Photographic Permanent Archival Record by CAT of both the interior and the exterior of the Greyhound Station in context with its surrounding development (Thunderbird Inn) has been identified as adequate mitigation for the adverse effects to both NRHP-eligible properties.

The potential for archaeology sites also exists below the pavement at the Greyhound Site, and additional testing or monitoring is warranted during construction.

With implementation of the mitigation measures/environmental commitments described above and outlined in the amended Memorandum of Agreement executed on September 7, 2011, FTA finds that the project will have no significant impacts on historic properties or archaeological sites eligible for the NRHP, and that the Section 106 consultation requirements for the project have been fulfilled.

Section 4(f) Properties

Renovation of the NRHP-eligible Greyhound Bus Station would result in the permanent use of a Section 4(f) property. Pursuant to 23 C.F.R. §774. 3, FTA may only approve the use of a Section 4(f) property if there is no feasible and prudent avoidance alternative to use of the Section 4(f)

property and all possible planning has been taken to minimize harm to the property or if the use of the property will only involve a *de minimus* impact.

The amended MOA executed on September 7, 2011, between FTA, CAT, and the SHPO documents the measures and commitments that will address and mitigate the adverse effects to the Greyhound Bus Station. A copy of the amended MOA is attached to the Revised FONSI. Based on the mitigation plan set forth in the amended MOA, pursuant to 23 C.F.R. §774.3(b), FTA therefore finds that there will only be a *de minimus* impact on the Section 4(f) property. The Section 4(f) requirement is therefore satisfied.

Based on the environmental assessment and its associated supporting documents, the Federal Transit Administration finds pursuant to 23 C.F.R. Part 771.121 that there are no significant impacts on the environment associated with the construction of the CAT Downtown Intermodal Terminal Project.

BY: Yvette G. Taylor Date: 12/9/11
Yvette G. Taylor
Regional Administrator