

Finding of No Significant Impact

Project Name: CAT Downtown Intermodal Terminal
Project Location: Savannah, Chatham County, Georgia
Grant Applicant: Chatham Area Transit Authority

PROJECT DESCRIPTION

The Federal Transit Administration (FTA) and Chatham Area Transit Authority (CAT) propose to build a new Intermodal Terminal in downtown Savannah. The proposed facility would serve the expanding needs of CAT and its passengers by centralizing transfers between existing and proposed bus routes, improving system linkage and accessibility, improving customer service and safety, reducing congestion and improving air quality, and housing CAT administrative functions. The proposed Intermodal Terminal would also serve the intercity bus system, Greyhound Bus Lines, as well as taxi services, private tour buses, and a potential streetcar.

PURPOSE AND NEED

Centralize bus operations. The proposed intermodal terminal would provide a central location that would accommodate exiting and potential future riders through more routes and expanded hours of service. There is currently limited space for expansion of transit operations and services in the downtown area using the street as transfer locations.

Improve system linkage and accessibility. The proposed intermodal terminal would create a central location to be used as a regional and local transportation hub with direct connection to parking and alternative transportation services. There is currently no direct connectivity to other public transportation providers or alternative transportation modes.

Improve customer service and safety. The proposed intermodal terminal will improve customer service and accommodate exiting and potential future riders by providing passenger amenities and a safe, comfortable waiting space, as well as access to transit agents. The transit system is currently devoid of facilities that develop passenger services and encourage greater usage of the system. In addition, space required for waiting on-street transfers is currently in competition with increased pedestrian and vehicular activity in the downtown area, creating safety concerns.

Reduce congestion and improve air quality. The proposed intermodal terminal would reduce and manage existing on-street transfers and the associated downtown congestion and air quality pollution of idling buses. On-street transfer points are becoming increasingly congested, and parked and idling CAT buses create localized air quality issues, as well as reduced street parking.

Provide administrative office space. The proposed intermodal terminal would provide office space for CAT marketing staff and the CAT Mobility Services Coordinator. The existing CAT administrative offices do not have adequate space to accommodate these staff, and they are currently located offsite in trailers.

ALTERNATIVES

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 Bus 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.

Locally Preferred Alternative

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 Bus Station. Conceptual plans have been developed for the site, which is proposed to be served by two CAT bus access drives, one on Fahm Street and another on Ann Street, as well as one Greyhound bus access drive on Fahm Street. One vehicle access drive is proposed to be located on W. Oglethorpe Avenue to access a second level parking lot.

The Intermodal Terminal at the Greyhound site is proposed to be a multi-use, two-story facility that would house passenger waiting and transfer facilities for existing and future CAT buses (15 saw-tooth bus slips), Greyhound buses (seven saw-tooth bus slips), private tour buses and a streetcar; access to taxi service; bicycle parking; passenger and driver amenities to include public restrooms and vending; a police mini-station; Greyhound ticketing, customer service, and CAT transit agents; Greyhound and CAT administrative office space; and parking for CAT staff, Greyhound staff, Greyhound Package Express (GPX), taxis, bicycles, and paid parking.

SUMMARY OF IMPACTS

With the exception of the potential impacts described below, the LPA would result in either beneficial or minimal to no environmental impacts.

Historic and Archaeological Resources

The LPA would involve demolition of the existing Greyhound Station, which has been determined eligible for listing on the National Register of Historic Places (NRHP), and demolition of the structure

constitutes an adverse effect to the eligible property. Through coordination with the Georgia SHPO during the Section 106 consultation process, photo documentation has been identified as adequate mitigation of the adverse impact. The potential for archaeology sites also exists below the pavement at the Greyhound Site, and additional testing or monitoring is warranted during construction.

The LPA would also have an adverse visual effect on the Thunderbird Inn, which is also eligible for the NRHP. However, based on the condition that the Georgia SHPO will have the opportunity to comment on design plans for the new intermodal terminal, the LPA will have a conditional no adverse effect on the eligible resource.

With implementation of the mitigation commitments described above, 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

Demolition of the potentially eligible Greyhound Bus Station would result in the permanent use of the Section 4(f) property. FTA may only approve the use of a Section 4(f) property if there is no feasible and prudent avoidance alternative to use of land from the property, and if all possible planning to minimize harm to the property has occurred.

Avoidance alternatives were considered, including the No-build alternative and the Louisville Road Site alternative, and both were determined to be not prudent. The No-build alternative does not satisfy the project need and purpose, and the Louisville Road site is not prudent because of compounding significant environmental issues. Design measures that would avoid demolition and to minimize harm were considered, but were determined not feasible because they would not provide the space needed or the appropriate functionality for transit operations.

FTA approves the LPA and its permanent use of the Section 4(f) property, based on the finding that the LPA causes the least overall harm considering the following factors:

- ability to mitigate adverse impacts to the Section 4(f) property
- lack of objection by officials with jurisdiction over the Section 4(f) property
- effectiveness with which the LPA meets the project purpose and need
- substantial difference in impacts and cost among alternatives.

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.

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.

COMMENTS AND COORDINATION

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 was published in the *Savannah Morning News* on Sunday, June 8, 2008, and the document was available for review for 30 days at the Chatham Area Transit Authority office, at the main branch of the public library, and on the internet at <http://www.catchacat.org>. A copy of the notice of availability is attached.

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 notice of availability 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 changes to the text of the EA/Section 4(f) Evaluation. No other public or agency comments were received. Additional details regarding the public comment period are provided in the EA Addendum.

PROJECT COMMITMENTS

The mitigation measures listed below are required as conditions of this FONSI. The FTA finds that with the implementation of these mitigation commitments, all reasonable, prudent, and feasible means to avoid or minimize impacts from the project will have been taken. The FTA will ensure that the following commitments as stipulated in the Section 106 Memorandum of Agreement are implemented:

1. **Historic Properties – Greyhound Bus Terminal.**
CAT will prepare a Photographic Permanent Archival Record of the Greyhound Bus Terminal before demolition. Digital format photography will be used for the photo documentation, including interior and exterior photographs. Documentation will be prepared in accordance with the Georgia HPD “Revised Draft Guidelines for Establishing a Photographic Permanent Archival Record” (August 22, 2007).
2. **Historic Properties – Thunderbird Inn.**
CAT will provide the Georgia Historic Preservation Division (HPD) with design drawings of the project and of its relation to the Thunderbird Inn when the design is 50 percent complete and 95 percent complete. The Georgia HPD will have 30 days after receipt of the drawings to review and provide comments to CAT. CAT shall inform the Georgia HPD of its response to such comments. If the design would result in a visual adverse effect to the Thunderbird Inn, the adverse effect will need to be mitigated and the MOA will be amended.
3. **Archaeological Sites.**
CAT will perform preliminary archaeological investigations after the pavement is removed to determine whether archaeological resources are present on the Greyhound site, and if present, to evaluate the eligibility of those resources for the Register. CAT shall hire an archaeologist who will be responsible for performing the archaeological activities required by the MOA. All archaeological work will be conducted by a professional meeting the Secretary of the Interior's Professional Qualification Standards (48 FR 44716, Sept. 1983) in archaeology. The archaeologist

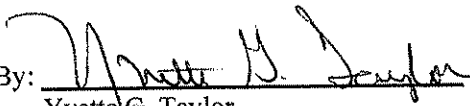
will follow the "Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation." A written report of the investigation will be submitted to Georgia HPD for review and comment. If CAT and Georgia HPD concur that no archaeological resources eligible for the National Register of Historic Places are present on the Project site, the investigation will be complete. If CAT and Georgia HPD concur that the results of the investigation demonstrate that the site is eligible for inclusion in the National Register, CAT will ensure that all feasible means of site avoidance are considered. If all means of site avoidance are exhausted, the CAT archeologist shall develop a data recovery plan as described below.

CAT's archaeologist shall develop a data recovery plan in consultation with HPD for the recovery of archaeological data from the sites that are determined to be eligible for inclusion in the National Register of Historic Places. A written report of the excavation shall be submitted to the HPD for review and approval. Depending upon the nature of the site and findings, a popular summary or other public outreach product may also be prepared. Construction may begin upon Georgia HPD's concurrence that the data recovery effort has been completed satisfactorily in accordance with the approved recovery plan. Finally, the CAT archeologist will be onsite to monitor activities during construction to ensure that no unanticipated resources are discovered.

DETERMINATIONS AND FINDINGS

FTA is the lead federal agency responsible for approval of the EA. The EA was prepared on behalf of CAT pursuant to the National Environmental Policy Act (NEPA) of 1969; the Council on Environmental Quality Regulations implementing NEPA (40 CFR 1500-150); US DOT guidelines, Environmental Impact and Related Procedures (23 CFR 771) as specified by the Federal Transit Administration (FTA) (49 CFR 622.101); and Federal Transit Administration NEPA guidelines (UMTA Circular 5620.1). The evaluation of potential impacts have been documented in the EA, which has determined that the project's construction and operation would not cause significant adverse environmental impacts that can not be mitigated.

After careful consideration of the EA, supporting studies, and public and agency comments, FTA finds under 23 CFR 771.121 that the proposed project, with implementation of the mitigation commitments, will have no significant adverse impacts on the environment. The *CAT Downtown Intermodal Terminal Draft Environmental Assessment and Section 4(f) Evaluation*, appended supporting documents, and Addendum are incorporated by reference as part of this FONSI and form the complete and final record on which the finding is based. The record provides sufficient evidence and analysis for determining that an EIS is not required.

By:  9-18-08
Yvette G. Taylor
Regional Administrator
Federal Transit Administration

Date: 9-18-08