

**Draft
Supplemental Focused
Environmental Assessment
for
Savannah Courthouse Annex
Savannah, Georgia**

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COVER SHEET

Responsible Agency: U.S. General Services Administration (GSA)

Title: Draft Supplemental Focused Environmental Assessment for the Savannah Courthouse Annex, Savannah, Georgia

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Abstract: The United States (U.S.) General Services Administration (GSA) Southeast Sunbelt Region plans to construct and operate a courthouse annex to the existing Tomochichi Federal Building and U.S. Courthouse (herein referred to as the Tomochichi Courthouse), located in Savannah, Georgia. GSA originally completed the site selection process in 1996 when GSA prepared an Environmental Impact Statement (EIS) for the *U.S. Courthouse Annex, Savannah, Georgia* (herein referred to as the 1996 Courthouse Annex EIS) to address potential impacts associated with the construction and operation of the courthouse annex to the Tomochichi Courthouse at one of three sites. At the conclusion of the EIS, GSA selected a site and initiated the design for the annex in 1996, but the project was not funded until 2016 after GSA reprogrammed the project with reduced square footage requirements following an updated housing study. Upon receiving the authorization and appropriation in 2016, GSA re-initiated the design process. GSA is pursuing a revised design for the courthouse annex to address the current needs of the Federal Courts and to respond to public and agency feedback received during consultation under Section 106 of the National Historic Preservation Act.

This EA evaluates the Proposed Action and the No Action Alternative and those Alternative(s) that GSA considered, but eliminated. As part of this EA, GSA studied the potential impacts of each alternative on the natural, cultural, and social environment. GSA is consulting under Section 106 of the National Historic Preservation Act, 16 United States Code (USC) 470f and intends to fulfill the Section 106 process, which is supported through the NEPA process including public notification and consultation.

GSA's Proposed Action is to construct and operate a courthouse annex to the existing Tomochichi Courthouse, located in Savannah, Georgia. This 0.8-acre tract is located at 120 Barnard Street and 124 Barnard Street in Savannah, Georgia which is currently occupied by Buildings A and B of the Juliette Gordon Low (JGL) Federal Building Complex. The project area is located immediately west of the Tomochichi Courthouse and bounded by State Street, Whitaker Street, York Street, and Barnard Street. West President Street extends through the middle of the site. The entire project site is GSA-owned property, including West President Street which is currently a limited or restricted access road.

The EA evaluates the following alternatives that GSA could implement to support the purpose and need of the Proposed Action:

- Proposed Action – Three-Story Building at 124 Barnard Street with Retention of Existing JGL Building A at 120 Barnard Street.
- No Action Alternative – Maintain existing conditions.

The EA also evaluates alternatives that GSA considered, but eliminated, and the reasons for eliminating them. GSA originally considered design alternatives that involved a new three-story annex building with secure surface parking, a new three-story annex building with secure underground parking and a park-like setting at JGL A, a new three-story annex building with underground parking and retention of JGL A, and new two-story annex spanning over West President Street. GSA received feedback regarding the design alternatives from the public and agencies. A concern expressed from the community is the importance of minimizing impacts to the Oglethorpe Plan and the Savannah Historic District. Additionally, since the 1996 Courthouse Annex EIS, the current needs of the Federal Courts have changed. Due to design and budget constraints, and to address public and agency feedback along with the needs of the Federal Courts, GSA determined that these alternatives would not be selected and therefore would no longer be considered for evaluation in this EA.

Availability: This Draft EA is available for public review and comment at the Carnegie Library, 537 East Henry Street, Savannah, Georgia. The public is invited to provide comments to GSA on the Draft EA by the close of the 30-day comment period. The Draft EA was distributed to cognizant agencies, interested parties, and the local library. The Draft EA is available electronically on GSA's website at: <https://www.gsa.gov/about-us/regions/welcome-to-the-southeast-sunbelt-region-4/buildings-and-facilities/georgia/savannah-us-courthouse-annex>. Comments or requests for copies of the EA should be sent to Mr. Ashish Desai using the contact information provided in this cover sheet. Comments received by the close of the comment period will be considered in preparation of the Final EA.

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ACRONYMS

Acronym	Definition
AADT	annual average daily traffic
ACHP	Advisory Council on Historic Preservation
APE	area of potential effect
CAA	Clean Air Act
CAT	Chatham Area Transit
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CO ₂	carbon dioxide
CO ₂ -eq	carbon dioxide-equivalent
CWA	Clean Water Act
dB	decibel
dBA	A-weight decibel
EA	Environmental Assessment
EIS	Environmental Impact Statement
EO	Executive Order
GSA	General Services Administration
HPD	Historic Preservation Division
I-	Interstate
IICEP	Interagency and Intergovernmental Coordination Planning
JGL	Juliette Gordon Low
LEED	Leadership in Energy and Environmental Design (LEED)
L _{dn}	Day-night average sound level
L _{eq}	Equivalent sound level
LOS	level of service
MOA	Memorandum of Agreement
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NPS	National Park Service
NRHP	National Register of Historic Places

Acronym	Definition
RCRA	Resource Conservation and Recovery Act
ROI	Region of Influence
SHPO	State Historic Preservation Office
U.S.	United States
USACE	U.S. Army Corps of Engineers
USC	United States Code
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service

CHAPTER 1 INTRODUCTION

1.1 INTRODUCTION

This section provides the reader with necessary introductory and background information concerning the Proposed Action for proper analytical context; identifies the purpose of and need for the Proposed Action and the federal decision to be made; and provides a summary of public and agency involvement (and key issues identified).

1.2 BACKGROUND

The United States (U.S.) General Services Administration (GSA) Southeast Sunbelt Region plans to construct and operate a courthouse annex to the existing Tomochichi Federal Building and U.S. Courthouse (herein referred to as the Tomochichi Courthouse), located in Savannah, Georgia. GSA originally evaluated three sites for the construction of the annex. The site selection process was completed in 1996 when GSA prepared an Environmental Impact Statement (EIS) for the *U.S. Courthouse Annex, Savannah, Georgia* (herein referred to as the 1996 Courthouse Annex EIS) to address potential impacts associated with the construction and operation of the courthouse annex to the Tomochichi Courthouse at the three sites. At the conclusion of the EIS, GSA selected a 0.8-acre site bounded by State Street, Whitaker Street, York Street, and Barnard Street.

The site selected for construction of the proposed annex is currently occupied by Buildings A and B of the Juliette Gordon Low (JGL) Federal Building Complex at 120 Barnard Street and 124 Barnard Street, and is already owned by the federal government. GSA originally initiated the design for the annex in 1996, but the project was not funded until 2016 after GSA reprogrammed the project with reduced square footage requirements following an updated housing study. Upon receiving the authorization and appropriation in 2016, GSA re-initiated the design process. GSA is pursuing a revised design for the courthouse annex to address the current needs of the Federal Courts and to respond to public and agency feedback received during consultation under Section 106 of the National Historical Preservation Act. Table 1-1 presents a timeline of the principal events and activities that GSA has completed in development of the project since the 1996 Courthouse Annex EIS.

1.3 PURPOSE AND NEED

The purpose of the Proposed Action is to construct an annex at the site selected in the 1996 Courthouse Annex EIS that would meet the anticipated 10-year space requirements and 30-year expansion needs of the U.S. Courts and related agencies. Implementation of the project would allow the Judiciary to meet its current and long-term needs for security, accessibility, and operational efficiency. The project would allow construction of courtrooms that meet the *U.S. Courts Design Guide* standards. The existing courtrooms, chambers, and ancillary facilities do not meet these standards.

The proposed annex is needed to meet the current and future needs of the Southern District of Georgia, U.S. District Court. The number of U.S. District Court judges and associated staff has increased over recent years, and the Bankruptcy Court, U.S. Circuit Court, U.S. Marshals Service, and U.S. Probation Office, which currently use the Tomochichi Courthouse, all require additional space. While the existing Tomochichi Courthouse cannot accommodate the District Courts' continued growth, the building has served as the location of the District Court since the early 1800's. In order to satisfy the Courts' expansion requirements and maintain the Courts' presence in the existing Tomochichi Courthouse, a new 35,000-square foot annex has been proposed.

Table 1-1. Timeline of Key Project Activities

Date	Activity
February 1996	GSA completes the Final EIS and site selection
1996 – 1998	GSA completes design of the courthouse annex
1999	Construction not funded
2015	Reprogrammed with reduced square footage and new housing study
June 2016	GSA obtains funding for annex
October 2016	GSA meets with MPC and city planners
September 2017	GSA awards design-build contract
October 2017	GSA initiates preliminary design
November 2017	Public meeting about preliminary design concept
December 2017	Architectural review board meeting
January 2018	Consulting party meeting
February 2018	GSA initiates revised design
April 2018	GSA initiates the NEPA process
May 2018	Consulting party meeting
June 2018	NEPA and NHPA Section 106 Public Scoping Meeting; Consulting party meeting
August 2018	GSA initiates additional design revisions; GSA Public Building Service Commissioner approves revised concept design
September 2018	Consulting party meeting
February 2019	GSA Publishes and Releases Draft Supplemental Focused EA.

Acronyms: EIS = Environmental Impact Statement; GSA = General Services Administration; MPC = Metropolitan Planning Commission; NEPA = National Environmental Policy Act; NHPA = National Historic Preservation Act

1.4 ENVIRONMENTAL ASSESSMENT PROCESS

GSA has prepared this Supplemental Focused Environmental Assessment (EA) to identify, analyze, and document the potential environmental, cultural, and socioeconomic impacts associated with GSA's Proposed Action of constructing and operating an annex to the existing Tomochichi Courthouse. GSA, as a federal agency, is required to incorporate environmental considerations into their decision-making process for the actions they propose to undertake. This is done in accordance with the National Environmental Policy Act of 1969 ([NEPA]; 42 United States Code [USC] 4321 et seq.), the Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] 1500-1508), and GSA's implementing procedures for compliance with NEPA (GSA Order ADM 1095.1F, *Environmental Considerations in Decision Making*). Figure 1-1 presents the key steps in the NEPA process for federal actions. This statute and the implementing regulations require that GSA, as a federal agency:

- assess the environmental impacts of its proposed action;
- identify any adverse environmental effects that cannot be avoided, should the proposed action be implemented;
- evaluate alternatives to the proposed action, including a no action alternative; and
- describe the cumulative impacts of the proposed action together with other past, present, and reasonably foreseeable future actions.

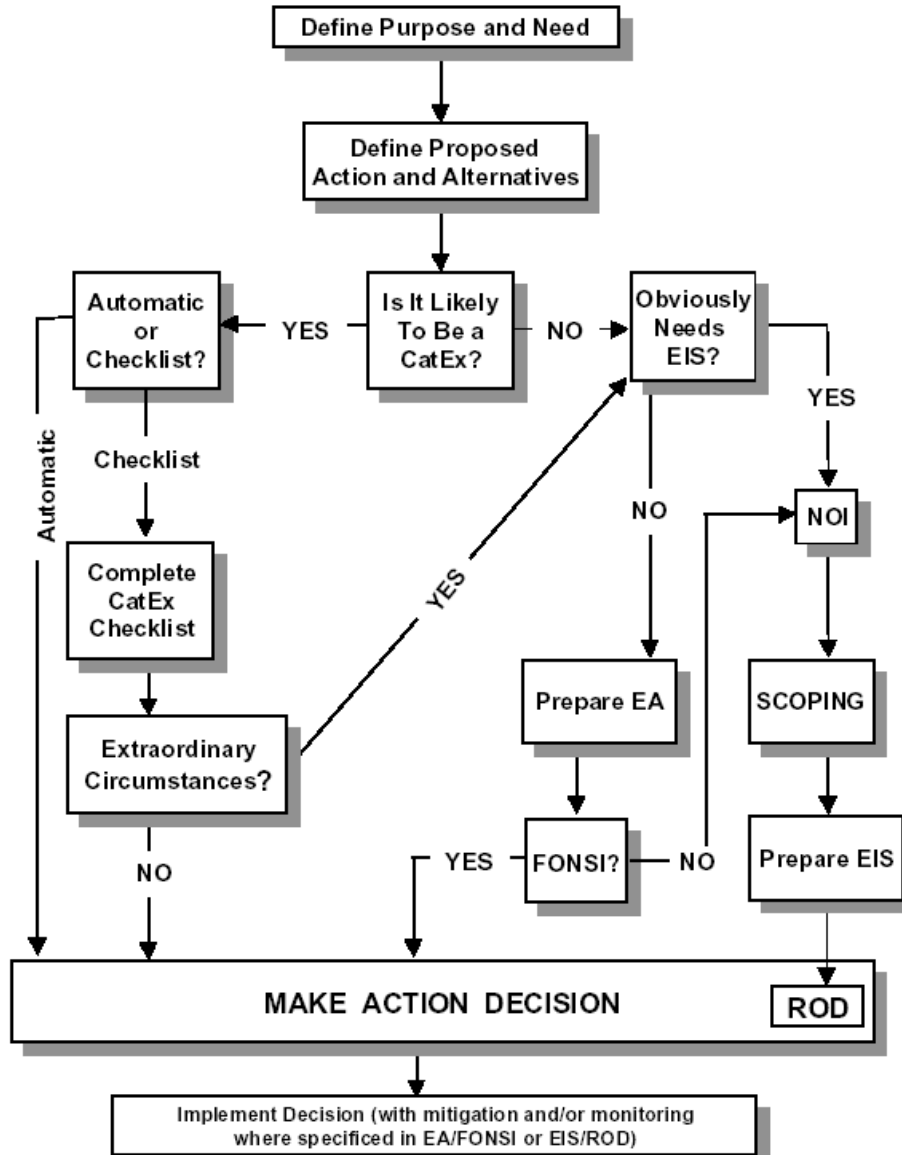
This Supplemental Focused EA builds on the analysis presented in the 1996 Courthouse Annex EIS by addressing changes at the selected site since the completion of that EIS and presenting annex design information, which was not available in 1996. This EA is intended to meet GSA's regulatory requirements under NEPA and provide GSA with the information needed to make an informed decision about constructing the proposed courthouse annex. In accordance with the above regulations, this EA allows for public input into the federal decision-making process; provides federal decision-makers with an understanding of potential environmental effects of their decisions before making these decisions; and documents the NEPA process.

Table 1-2 provides a chronology of NEPA compliance activities conducted to date as well as activities planned for this project.

Table 1-2. NEPA Compliance Activities

Date	Action
February 1996	GSA publishes the Final EIS for the <i>U.S. Courthouse Annex, Savannah, Georgia</i> .
April 2018	GSA initiates NEPA process for revised design.
May 23, 2018	Letters were sent to interested parties to announce the Public Scoping Meeting.
May 23, 2018	Public Scoping Period begins.
May 30, June 3 and 4, 2018	Advertisements for the Public Scoping Meeting were published in the Savannah Morning News.
June 6, 2018	GSA hosts a Public Scoping Meeting for NEPA and NHPA Section 106.
June 26, 2018	Public Scoping Period ends.
February 2019	GSA Publishes and Releases Draft Supplemental Focused EA.
March 2019	End of 30-day Public Comment Period on the Draft Supplemental Focused EA.
Spring 2019	GSA Publishes and Releases Final Supplemental Focused EA.

Acronyms: EA = Environmental Assessment; EIS = Environmental Impact Statement; GSA = General Services Administration; NEPA = National Environmental Policy Act; NHPA = National Historic Preservation Act; U.S. = United States



Acronyms: CATEX = Categorical Exclusion; EA = Environmental Assessment;
EIS = Environmental Impact Statement; FONSI = finding of no significant impact;
ROD = record of decision

Figure 1-1. The NEPA Process

1.5 NATIONAL HISTORIC PRESERVATION ACT

Section 106 of the National Historic Preservation Act (NHPA) of 1966 requires that federal agencies take into account the effects of their actions on any district, site, building, structure, or object listed in, or eligible for inclusion in, the National Register of Historic Places (NRHP). GSA has initiated consultation under Section 106 of the NHPA 54 USC §306108 and intends to fulfill the Section 106 process, which is supported through the NEPA process including public notification and consultation.

GSA completed extensive consultation efforts with consulting parties in accordance with Section 106 of the NHPA. Consulting parties for Section 106 include representatives from the Advisory Council on Historic Preservation (ACHP), U.S. National Park Service (NPS), Georgia Historic Preservation Division

(HPD) which serves as the State Historic Preservation Office (SHPO), Savannah Metropolitan Planning Commission, Historic Savannah Foundation, National Trust for Historic Preservation, Telfair Museum, the Beehive Foundation, Savannah Downtown Neighborhood Association, U.S. Courts, U.S. Marshals Service, local elected officials, and other local organizations. GSA conducted Section 106 consulting party meetings to discuss the project and obtain feedback. Table 1-1 includes dates of consulting party meetings.

Consulting parties provided feedback and comments on the project via meetings, letters, and emails. The key topics concerning the consulting parties include: maintaining consistency with the Oglethorpe Plan, preservation of the Savannah Historic District's National Historic Landmark status, parking requirements and design, closure and/or obstruction of West President Street, and design features. This EA considers the topics raised during the Section 106 process.

1.6 OTHER LAWS AND EXECUTIVE ORDERS

This EA also addresses other applicable laws and regulations, including but not limited to the following:

- Archeological Resources Protection Act;
- Clean Air Act (CAA);
- Clean Water Act (CWA);
- Protection of Wetlands (Executive Order [EO] 11990);
- Floodplain Management (EO 11988);
- Endangered Species Act;
- The Noise Control Act of 1972, as amended;
- Environmental Justice (EO 12898);
- Pollution Prevention Act;
- Resource Conservation and Recovery Act (RCRA); and
- Comprehensive Environmental Response, Compensation and Liability Act.

1.7 PUBLIC INVOLVEMENT AND AGENCY COORDINATION

GSA invites public participation in decision-making on new proposals through the NEPA process. Public participation with respect to decision-making on the Proposed Action is guided by GSA's implementing procedures for compliance with NEPA (GSA Order ADM 1095.1F, *Environmental Considerations in Decision Making*).

Consideration of the views and information of all interested persons promotes open communication and enables better federal decision-making. Agencies, organizations, and members of the public with a potential interest in the Proposed Action are urged to participate. Appendix A provides a record of consultation with federal, state, and local agencies consultation conducted in association with this EA. Appendix B provides a summary of the public scoping activities and copies of scoping materials including newspaper announcements, meeting handouts, posters, and transcript.

Title 40 CFR 1500.1(b) states, "NEPA procedures must insure that environmental information is available to public officials and citizens before decisions are made and before actions are taken."

1.7.1 Public Review

The NEPA process is designed to ensure that public officials make decisions based on a full understanding of the environmental impacts of a Proposed Action and the public is informed of all factors and given adequate opportunity to provide input for the decision. CEQ regulations specify an early and open process involving all potentially affected parties for determining the scope and significance of issues to be addressed in the NEPA study.

As part of the scoping process, GSA has provided information on the Proposed Action and has solicited local input through newspaper advertisements, a public scoping meeting, and consulting party meetings. GSA staff has reviewed incoming correspondence, newspaper articles, and other public indications of interest or concern regarding the Proposed Action. On-going meetings and discussions were held with Agency representatives and state and city officials to further refine project design alternatives.

GSA also held a public scoping meeting so interested parties could find out more about the Proposed Action and express any concerns, issues, or alternatives they would like to see addressed in this EA. All comments at the meeting were transcribed and have become part of the public record. The public meeting was held on June 6, 2018, at the Metropolitan Planning Commission Office in Savannah and was attended by approximately 37 people. In advance of this meeting a public notice was published on May 30, June 3, and June 4, 2018 in the *Savannah Morning News*. In addition, a letter to announce the public meeting and solicit comments was sent to approximately 115 public agencies, public officials, and interested parties. Appendix B provides a summary of the public scoping activities and copies of scoping materials including newspaper announcements, meeting handout, posters, and transcript. All comments from citizens were recorded during the meeting, and letters and e-mails providing comments were received by GSA and considered in preparation of this EA.

Based on the 42 comments received during the scoping period, the following issues were the primary concerns regarding the project:

- Inconsistency with the Oglethorpe Plan;
- Potential impacts to the Savannah Historic District's National Historic Landmark status;
- Opposition of conversion of a trust lot into a surface parking lot;
- Recommendation of parking alternatives to the surface parking including underground parking and/or underground tunnels to existing underground parking;
- Opposition of obstruction of West President Street and maintaining as a closed street; and
- Recommendation that the design should be consistent with Telfair Square and surroundings.

This Draft EA is available for public review and comment after publication of the Notice of Availability in the *Savannah Morning News*. The public is invited to provide comments to GSA on the Draft EA by the close of the 30-day comment period. The Draft EA was distributed to cognizant agencies and interested parties. The Draft EA is available electronically on GSA's website at: <https://www.gsa.gov/about-us/regions/welcome-to-the-southeast-sunbelt-region-4/buildings-and-facilities/georgia/savannah-us-courthouse-annex>. Additionally, a copy of the Draft EA is available for review at the Carnegie Library 537 E Henry Street, Savannah, Georgia. Comments received by the close of the 30-day comment period will be considered in preparation of the Final EA.

1.7.2 Agency Coordination

Interagency and Intergovernmental Coordination for Environmental Planning (IICEP) is a federally mandated process for informing and coordinating with other governmental agencies regarding federal

Proposed Actions. CEQ Regulations require intergovernmental notifications prior to making any detailed statement of environmental impacts.

Through the IICEP process, GSA notifies relevant federal, state, and local agencies and allows them sufficient time to make known their concerns specific to a Proposed Action. Comments and concerns submitted by these agencies during the IICEP process were subsequently incorporated into the analysis of potential environmental impacts conducted as part of this EA. This coordination fulfills requirements under EO 12372 (superseded by EO 12416, and subsequently supplemented by EO 13132), which requires federal agencies to cooperate with and consider state and local views in implementing a federal proposal. It also constitutes the IICEP process for this EA.

To support the NEPA process and development of this Draft EA, GSA coordinated with the following agencies through agency consultation letters, meetings, and/or notification of the availability of the EA:

- Advisory Council on Historic Preservation (ACHP)
- U.S. Army Corps of Engineers (USACE)
- U.S. Environmental Protection Agency (USEPA) – Region 4
- U.S. Fish and Wildlife Service (USFWS) – Southeast Region
- U.S. National Park Service (NPS) – Southeast Region
- U.S. Courts
- U.S. Marshals Service
- Georgia Department of Natural Resources, Historic Preservation Division (HPD)
- Georgia Department of Natural Resources, Environmental Protection Division
- Georgia Trust for Historic Preservation
- City of Savannah
- Historic Savannah Foundation
- Savannah Metropolitan Planning Commission

Agency information and comments have been incorporated into this EA. Appendix A provides copies of relevant correspondence pertaining to the EA. Responses received from these agencies identified concerns consistent with those listed in Section 1.7.1. Section 1.5 describes additional agency coordination efforts that GSA conducted with consulting parties to support the Section 106 process.

1.8 ORGANIZATION OF THE EA

This EA describes the potential impacts based on reasonably foreseeable consequences of the Proposed Action and will recommend measures to mitigate potential adverse impacts. The EA is written in plain language and focuses specifically on information relevant to the project and potential environmental impacts. The chapters of this document provide the following information:

Chapter 1 establishes the context of the EA by discussing the Purpose and Need for the Proposed Action, project background, and scoping issues.

Chapter 2 describes the Proposed Action and presents the design alternatives considered, including a summary of the process used to evaluate design alternatives and a description of the alternatives evaluated in the EA.

Chapter 3 describes a summary of the existing conditions within the potentially affected environment, both natural and human-made, including regional conditions and specific site characteristics. Chapter 3 also summarizes the potential environmental impacts and recommended mitigation for the alternatives, as appropriate. Chapter 3 further describes potential cumulative impacts.

Chapter 4 lists the references consulted for the study.

Chapter 5 lists the individuals involved in the preparation of the EA.

The Appendices include detailed data and information pertinent to the EA including copies of notices published in local newspapers, transcripts of the public scoping meeting, letters received from agencies, and with a summary of comments.

CHAPTER 2 PROPOSED ACTION AND ALTERNATIVES

2.1 INTRODUCTION

This section provides the reader with necessary information on the Proposed Action and its alternatives, including the No Action Alternative and those Alternative(s) that GSA considered, but eliminated, and the reasons for eliminating them. As described in Chapter 1, CEQ's regulations direct all federal agencies to use the NEPA process to identify and assess the reasonable alternatives to proposed actions that would avoid or minimize adverse effects of these actions upon the quality of the human environment (40 CFR 1500.2[e]). The alternatives development and review process applied by GSA to hone the number of reasonable building design alternatives are described, providing the reader with an understanding of GSA's rationale in ultimately retaining for analysis within this EA three design alternatives, which meets GSA's purpose of and need for the Proposed Action.

2.2 PROPOSED ACTION

GSA's Proposed Action is to construct and operate a courthouse annex to the existing Tomochichi Courthouse, located in Savannah, Georgia. The proposed annex would be constructed at the site selected through the prior NEPA process and described in a 1996 Courthouse Annex EIS. This 0.8-acre tract is located at 120 Barnard Street and 124 Barnard Street in Savannah, Georgia which is currently occupied by Buildings A and B of the JGL Federal Building Complex. Figure 2-1 presents the existing JGL Buildings A and B. Figure 2-2 presents the project location, which is located immediately west of the Tomochichi Courthouse and bounded by State Street, Whitaker Street, York Street, and Barnard Street. West President Street extends through the middle of the site. The entire project site is GSA-owned property, including West President Street which is currently a limited or restricted access road. The site is comprised of the two eastern Trust Lots of Heathcote Ward, adjacent to Telfair Square.

Wards are defined according to the original plan for the City of Savannah, laid out by General James Edward Oglethorpe in 1733, which states that a ward measures 600 feet long in the north-south direction and 540 to 600 feet in the east-west direction. Each ward is named and serves as a neighborhood with internal streets and a common open space.

Trust Lots are the smaller four blocks within a ward that are created by the internal streets.



Figure 2-1. Existing Annex Buildings (Juliette Gordon Low Buildings A and B)

The existing annex buildings (JGL Buildings A and B) were constructed in 1985 and contain a total of 26,844 occupiable square feet (see Figure 2-1). The JGL Buildings A and B were vacated to prepare for the proposed new annex in Spring 2014 and Spring 2018, respectively. Prior to vacancy, the existing annex buildings housed approximately 20 employees (each) and had the following tenants: GSA field office, Federal Credit Union, U.S. Department of Labor, U.S. Coast Guard, and U.S. Internal Revenue Service. The personnel and services were moved to other locations within those organizations. None were moved to the Tomochichi Courthouse. Prior to closure, the JGL Buildings A and B had a combined total of approximately 350 visitors/customers per month. The maximum occupancy of the existing buildings is 190 people per International Building Code standards.



Figure 2-2. Proposed Project Location

Under the Proposed Action, GSA would construct and operate a new three-story annex building at 124 Barnard Street and retain the existing JGL Building A at 120 Barnard Street. The Proposed Action would involve demolition of the JGL Building B at 124 Barnard Street to allow for construction of the new three-story annex. JGL Building A would be retained and used as temporary office space during the construction of the new annex building. GSA has not yet determined how JGL Building A would be used after the construction period, but it is possible it may continue to be used as temporary office space, may be closed, or may be renovated and leased for use as office space.

The new annex would be approximately 35,000 gross square feet, 53 feet in height with an additional 8 feet for rooftop mechanical equipment, and have a maximum occupancy capacity of 534 people. The height of the new annex would be below the Tomochichi Courthouse which is approximately 74 feet high at the peak of its main roof. Renderings of the proposed design for the Proposed Action are shown on Figures 2-3, 2-4, and 2-5.

The design of the new annex considers the Savannah Historic District and nearby Tomochichi Courthouse and maintains the historic trust blocks of the Oglethorpe Plan. The design offers a modern structure with similar scale, massing, design, materials, and façade features of the nearby Tomochichi Courthouse. Under the Proposed Action, the new annex would include masonry, marble, brick, and metal. To the extent practicable, the materials selected would be similar to and complementary of the Tomochichi Courthouse; such as the Georgia white marble and buff-sand colored brick.

The main entrance of the annex would face Telfair Square on Barnard Street. The three-story building would include a first floor with the main building entrance from Telfair Square, security screening area, lobby, offices, limited internal parking, loading bay, maintenance rooms, and mail room; a second floor with offices and an open space and stairwell to the main lobby; and a third floor with offices, courtroom, and Judge's chambers. There would be a main stairwell from the lobby to the second floor and two public elevators.

West President Street would remain GSA-owned property and would continue to be a limited or restricted access road. West President Street would be used for construction staging and then resurfaced with a combination of the existing historic asphalt pavers outside the property boundary and new pervious pavers within the Government-owned parcel. West President Street would provide approximately 11 surface parking spaces for approved personnel per program requirements. Two secured parking spaces for approved personnel would be provided internal to the new annex on the first floor per program requirements. Annex personnel would continue to use existing secured parking that is located nearby.

The new annex would allow the Judiciary to meet its current and long-term needs for security, accessibility, and operational efficiency. Plans for the annex include a new bankruptcy courtroom and related chambers, as well as new offices for the U.S. Probation and Pretrial Services System and the U.S. Marshals Service. Those services are currently offered at the Tomochichi Courthouse and would be relocated to the new annex. GSA is planning to attain a Leadership in Energy and Environmental Design (LEED) Version IV Gold Building rating and U.S. Green Building Council Silver Sustainable Sites Initiative rating. Compared to standard buildings, LEED-certified buildings produce less waste and use less water, are more energy efficient, and offer sustainability measures. See Section 2.5 for a detailed discussion of the location, construction, design, and operational details of the Proposed Action.



Figure 2-3. Proposed Savannah Courthouse Annex – View 1 (View from Telfair Square near W State Street, looking southeast towards the main entrance of the proposed annex.)



Figure 2-4. Proposed Savannah Courthouse Annex – View 2 (View from Telfair Square, looking east towards the main entrance of the proposed annex.)



Figure 2-5. Proposed Savannah Courthouse Annex– View 3 (View from Whitaker Street, looking west on West President Street and the proposed annex on the left.)

2.3 NO ACTION ALTERNATIVE

Under the No Action Alternative, GSA would not construct the proposed annex. No changes would be made to the existing annex buildings at JGL Buildings A and B, and the expansion needs of the District Courts would not be met. The bankruptcy courtroom and related chambers, as well as the new offices for the U.S. Probation and Pretrial Services System would remain at its current location at the Tomochichi Courthouse, adversely affecting the efficiency of court operations.

2.4 ALTERNATIVES CONSIDERED BUT DISMISSED

NEPA requires GSA to assess a range of reasonable alternatives to the Proposed Action. Several alternatives were assessed to determine whether they were feasible and whether they would meet the project's purpose and need. Due to the change in needs of the Federal Courts, cost and feasibility considerations, and to respond to public and agency feedback received during development of the conceptual design for the project, GSA determined that the following alternatives would not be pursued. Table 2-1 summarizes the four design alternatives that were considered but excluded from consideration in the EA.

Table 2-1. Design Alternatives Dismissed from Further Evaluation

Design Alternative	Reason for Dismissal
Two-story Building Spanning over West President Street	Conflicts with Oglethorpe Plan, specifically the closure of President Street.
Three-Story Building with Secured Surface Parking	Conflicts with Oglethorpe Plan, specifically the construction of surface parking on a trust lot.
Three-Story Building with Secured Underground Parking and Retention of Existing JGL Building A	Design issues and excessive costs related to underground parking.
Three-story Building with Secured Underground Parking and a Park-like Setting	Design issues and excessive costs related to underground parking. Conflicts with Oglethorpe Plan, specifically the construction of a park on a trust lot.

Acronyms: JGL = Juliette Gordon Low

2.4.1 Two-story Building Spanning over West President Street

GSA considered construction and operation of a new two-story annex spanning over West President Street. The two-story annex would encompass the area of both existing JGL Buildings A and B. This alternative would involve building over West President Street, although the street would be reprised by a recessed building main entrance.

The two-story annex would be a total of approximately 46,000 square feet and 38 feet in height with an additional 8 feet for rooftop mechanical equipment. Secured parking would provide 25 parking spaces internally on the first floor of the building. The building materials used for this alternative would include brick, stucco, and metal, with a similar buff-sand color as the Proposed Action. Similar to the Proposed Action, the main entrance of the annex would face Telfair Square on Barnard Street. This alternative would require relocation of subsurface utilities lines currently located under West President Street.

As discussed in Section 1.2, the current needs of the Federal Courts have changed over time. In addition, GSA received feedback regarding the design from the public and agencies. A concern expressed from the community is the importance of minimizing impacts to the Oglethorpe Plan and the Savannah Historic District. Specifically, removal of West President Street would conflict with the Oglethorpe Plan. To respond to public and agency feedback and to accommodate the current needs of Federal Courts, GSA determined that this alternative is not feasible and would not be further considered for evaluation in this EA.

2.4.2 Three-Story Building with Secured Surface Parking

GSA considered construction and operation of a new three-story annex at 124 Barnard Street and a secured surface parking lot at 120 Barnard Street, Savannah, Georgia. The proposed new courthouse annex would be approximately 35,000 gross square feet in size and include an approximately 11,000-gross-square-foot secured parking lot. Under this alternative, demolition of JGL Buildings A and B would be required to allow for the construction of the annex and parking lot. This alternative would have similar design features as the Proposed Action discussed in Section 2.2 including similar building materials and the main entrance of the annex would face Telfair Square on Barnard Street.

Under this alternative, the 11,000-gross square foot secured surface parking lot would be available for use by approved annex employees only. Users of the parking lot would enter through the security gate and guard station located on West President Street from Whitaker Street. Two parking spaces would be located internal to the new annex on the first floor for approved personnel per program requirements. The remaining 23 parking spaces would be located within the secured and fenced lot to the north of the new annex. The fence around the parking lot would use buff-sand colored brick, similar to the new annex, and a transparent metal fence with planting. The existing paving of West President Street would be maintained.

Originally, GSA presented this alternative as the Preferred Action Alternative during the EA scoping period and at the scoping meeting. GSA received feedback regarding the design from the public and agencies. A concern expressed from the community is the importance of minimizing impacts to the Oglethorpe Plan and the Savannah Historic District. Specifically, many concerns were focused on the removal of JGL Building A to construct a secured surface parking lot on a Trust Lot. To respond to public and agency feedback, GSA determined that this alternative would not be selected and therefore would no longer be considered for evaluation in this EA.

2.4.3 Three-Story Building with Secured Underground Parking and Retention of Existing Juliette Gordon Low Building A

GSA considered construction and operation of a new three-story annex building with secured underground parking at 124 Barnard Street and retention of the existing JGL Building A at 120 Barnard Street. Similar to the Proposed Action, this alternative would involve demolition of the JGL Building B at 124 Barnard Street to allow for construction of the new three-story annex.

Under this alternative, the new annex would be approximately 35,000 gross square feet, 59 feet in height with an additional 8 feet for rooftop mechanical equipment, and include 11,000 square feet of secured underground parking. The building materials used for this alternative would include brick and stucco detailing, with a similar buff-sand color as the Proposed Action. Similar to the Proposed Action, the main entrance of the annex would face Telfair Square on Barnard Street.

The secured underground parking would provide 25 parking spaces within the planned footprint of the proposed annex. The secured underground parking lot would be available for use by approved annex employees only. Users of the parking lot would enter through the security gate and guard station located on West President Street from Whitaker Street. West President Street would remain GSA-owned property and would continue to be a limited or restricted access road to be used for access to the secured underground parking at the new annex. The secured underground parking would involve construction approximately 5 feet below ground level. To accommodate the underground parking, the first floor of the annex would be approximately 5 feet above ground level. The balance of construction activities for this alternative would generally be consistent with the construction activities described for the Proposed Action in Section 2.5.1.

Originally, GSA presented this alternative as a design alternative during the EA scoping period and at the scoping meeting. During the project development process, GSA considered design, cost, and feasibility. Due to design and budget constraints, GSA determined that this alternative would not be selected and therefore would no longer be considered for evaluation in this EA. Refer to Section 2.4.5 for additional information about parking alternatives.

2.4.4 Three-story Building with Secured Underground Parking and a Park-like Setting at 120 Barnard Street

Under this alternative, GSA considered construction and operations of a new three-story annex building with secured underground parking at 124 Barnard Street and a park-like setting at 120 Barnard Street. This alternative would involve demolition and removal of the existing JGL Buildings A and B. Under this alternative, the new annex would be approximately 35,000 gross square feet, 59 feet in height with an additional 8 feet for rooftop mechanical equipment, and include 11,000 square feet of secured underground parking. The secured underground parking would provide 25 parking spaces within the planned footprint of the proposed annex. West President Street would remain GSA-owned property and would continue to be a limited or restricted access road to be used for access to the secured underground parking at the new annex. This alternative would involve similar building design features (e.g., height, parking, materials) as the dismissed alternative discussed in Section 2.4.3. The park area proposed under this alternative would include an open area with landscaped grass, shrubs, and a few trees.

Originally, GSA presented this alternative as a design alternative during the EA scoping period and at the scoping meeting. GSA received feedback regarding the design from the public and agencies. A concern expressed from the community was the importance of minimizing impacts to the Oglethorpe Plan and the Savannah Historic District. Additionally, GSA considered design, cost, and feasibility. Refer to Section 2.4.5 for additional information about parking alternatives. Due to design and budget constraints, and to address public and agency feedback, GSA determined that this alternative would not be selected and therefore would no longer be considered for evaluation in this EA.

2.4.5 Parking Alternatives

During development of the project design, GSA considered several parking alternatives to address secure parking for approved personnel. Parking alternatives included underground parking below the proposed new building, tunnels from the proposed new building to access nearby existing underground parking, and a secured surface parking lot. Project design considered many aspects of parking including design, cost, and feasibility. For example, underground parking and tunnels must consider depth, existing underground features (utilities), and cost. Due to design and budget constraints, GSA determined that underground parking and tunnels to existing underground parking would be not feasible and therefore, would not be considered for evaluation in this EA. Additionally, GSA received feedback regarding the design from the public and agencies. Specifically, many concerns were focused on construction of a secured surface parking lot on a Trust Lot. To respond to public and agency feedback, GSA has elected to remove exterior parking from the scope of the current undertaking and therefore, would no longer be considered for evaluation in this EA.

2.5 PROJECT INFORMATION

This section provides additional details associated with the construction and operation of the courthouse annex.

2.5.1 Construction

Construction would begin in 2019 and take approximately 20 months. All construction activities, including staging/laydown, would remain within the 0.6-acre site area of JGL Building B (see Figure 2-2). West

President Street would be used for construction staging and then resurfaced with a combination of the existing historic asphalt pavers and new pervious pavers. The JGL Building A could be used as temporary office space during construction. Construction activities would include demolition of existing JGL Building B, utility tie-ins, erection of structure, and finishing work. Construction equipment would be typical of building construction, including trucks (cement and dump), backhoe, loader, bulldozer, crane, concrete equipment, and paver. On average, construction would require 40 construction workers onsite and 3 trucks per day for deliveries and waste removal. Peak construction would last for approximately 8 months with a potential maximum of 70 construction workers and 9 trucks per day. All construction and demolition waste would be disposed and recycled at authorized facilities.

The Proposed Action would require utility tie-ins to existing infrastructure for electricity, natural gas, waste, wastewater, and internet/phone connections. Domestic water would connect to an existing 8-inch water main in West State Street and enter the proposed annex on the northwest corner. Irrigation service would connect to an existing 12-inch water main in Whitaker Street. A sanitary sewer line would exit the proposed annex and connect to an existing 8-inch main at an existing manhole in Barnard Street. Electric service would connect to the existing system operated by Georgia Power Company. Connection of the proposed natural gas-fired generator would require a new tie in to existing 4-inch main lines operated by the Savannah Gas Company and located underneath State and York Streets. All utility construction would involve work at ground level and below-grade since the utilities are subsurface.

Construction would involve temporary road and pedestrian sidewalk closures. Road closures would be periodic and temporary during the construction period. Pedestrian sidewalks along the perimeter of the project site would be closed during the duration of construction. Pedestrians would be directed to utilize the sidewalks on the other side of the street.

2.5.2 Operations

Operation of the new annex under the Proposed Action is estimated to begin in early 2021. The new annex would have a maximum occupancy capacity of approximately 534 people. The new annex would offer bankruptcy court and related chambers along with U.S. Probation and Pretrial services. Those services are currently offered at the Tomochichi Courthouse, and would be relocated to the new annex.

GSA estimates approximately 48 employees would work at new annex. The staff would include the Chief Bankruptcy Judge and accompanying chambers staff, Visiting Bankruptcy Judge and staff, the Bankruptcy clerk and staff, Court Security offices under the U.S. Marshals Service, Probation officers and accompanying administrative staff, GSA onsite building management staff, and maintenance/facilities staff. Approximately 34 of the employees would be relocated from the Tomochichi Courthouse, where the services are currently located. The balance of 14 employees would be newly hired employees.

Bankruptcy hearings involve groups of people that typically include the defendant, lawyer, family, witnesses, and trustees. The bankruptcy proceedings occur in approximately 5-minute intervals, resulting in groups of people that frequently arrive and depart from the building. On average, it is estimated that approximately 65 people per week would use the bankruptcy services. The bankruptcy hearings typically occur once per week but depending on the schedule of the judge and court, it could occur twice per week. The U.S. Probation and Pretrial services typically involve meetings with the individual under probation and the probation officer. The meetings typically occur once per month and must occur within a court facility. Probation services at the new annex would occur daily and are estimated to involve an average of approximately 60 people per week.

Depending on the schedules of the judges and court services, it is estimated that a maximum number of visitors/patrons at the new annex could be up to 800 people per month, but it is expected that the actual usage would be less. Since the bankruptcy and probation services are currently provided at the Tomochichi

Courthouse and would be relocated to the new annex, the estimated usage of the services would not change due to the proposed project.

The heating and cooling of the building is not yet designed but it is likely that a natural gas-fired boiler would be used for heating. An emergency backup generator would be used in the event of a power outage to evacuate individuals out of the building. The backup generator would be natural gas-fired and appropriately sized for the building.

2.6 COMPARISON OF ALTERNATIVES AND IMPACTS

Table 2-2 provides a comparison of project alternatives and Table 2-3 presents a comparison of potential impacts. Refer to Chapter 3 for a detailed analysis of the environmental resources and potential impacts due to the Proposed Action and Alternatives.

Table 2-2. Comparison of Alternatives

Resource	No Action Alternative ^a	Proposed Action
Building Stories	3	3
Number of Buildings	2	1
Secured Parking	Local street/garage	2 secured onsite parking spots for approved personnel; Balance of staff to use local street/garage
Square Feet	26,844 ^c	35,000 (building)
Height (feet)	45	61 ^b
Building Materials	Granite, terracotta tiles, glass	Masonry, marble, brick, and metal
Occupants	GSA field office, Federal Credit Union, U.S. Department of Labor, U.S. Coast Guard, and U.S. Internal Revenue Service ^c	U.S. Bankruptcy Court, U.S. Probation and Pretrial Services, and U.S. Marshals Service
Occupancy (people)	380 ^c	534
Personnel/Employees	38 ^c	48

a. The No Action Alternative proposes to maintain existing conditions. This would involve retaining the two existing annex buildings which are currently vacant.

b. The height of the new buildings includes 8 feet of rooftop mechanical equipment.

c. Value represents the total for both buildings prior to closure.

Table 2-3. Comparison of Impacts

Resource	No-Action Alternative	Proposed Action
Cultural Resources	No Impact	Minor
Traffic and Transportation	No Impact	Negligible to Minor
Air Quality	No Impact	Negligible
Biological Resources	No Impact	Negligible
Geology and Soils	No Impact	Negligible
Health and Safety	No Impact	Negligible
Infrastructure and Utilities	No Impact	Negligible
Land Use and Aesthetics	No Impact	Negligible
Materials and Wastes	No Impact	Minor
Noise	No Impact	Minor to Moderate
Socioeconomics and Environmental Justice	No Impact	Negligible
Water Resources	No Impact	Negligible
Cumulative	No Impact	Negligible to Minor

Note: Refer to Section 3.1 for information about impact ratings.

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CHAPTER 3 ENVIRONMENTAL SETTING AND CONSEQUENCES

3.1 INTRODUCTION

This section provides relevant environmental, cultural, and socioeconomic baseline information, and identifies and evaluates the individual or cumulative environmental and socioeconomic changes likely to result from constructing and operating the proposed Savannah Courthouse Annex. The Region of Influence (ROI) for this EA includes the existing Tomochichi Courthouse, the 0.8-acre proposed site, and the immediately adjoining properties.

The methodology used to identify the existing conditions and to evaluate potential impacts on the physical and human environment involved the following: review of documentation and project information provided by GSA and their consultants, searches of various environmental and agency databases, agency consultations, and a site visit conducted on June 6, 2018. All references are cited, where appropriate, throughout this EA.

Wherever possible, the analyses presented in this chapter quantify the potential impacts associated with the Proposed Action Alternatives and the No Action Alternative. Where it is not possible to quantify impacts, the analyses presents a qualitative assessment of the potential impacts. The following descriptors qualitatively characterize impacts on each resource area analyzed:

- Beneficial – Impacts would improve or enhance the resource.
- Negligible – A resource would not be affected, or the effects would be at or below the level of detection, and changes would not be of any measurable or perceptible consequence.
- Minor – The action would have a barely detectable or measurable adverse impact on the resource. Effects would be localized, small, and of little consequence to the sustainability of the resource.
- Moderate – The action would have a noticeable or measurable adverse impact on the resource. This category could include potentially significant impacts that could be reduced to a lesser degree by the implementation of mitigation measures.
- Significant – The action would have obvious and extensive adverse impacts that could result in potentially significant impacts on a resource despite mitigation measures.

3.1.1 Resource Areas Screened from Detailed Analysis

CEQ regulations encourage NEPA analyses to be as concise and focused as possible, consistent with 40 CFR 1500.1(b) and 1500.4(b): "...NEPA documents must concentrate on the issues that are truly significant to the action in question, rather than amassing needless detail ... prepare analytic rather than encyclopedic analyses." Consistent with the NEPA and CEQ Regulations, this EA focuses on those resources and conditions potentially subject to effects.

Table 3-1 identifies and describes the resources that GSA determined would either not be affected or would sustain negligible impacts from the Proposed Action and not require further evaluation. This included an assessment of the impact analysis from the 1996 Courthouse Annex EIS along with current conditions of the site. The resource areas dismissed from further analysis are air quality, biological resources, geology and soils, health and safety, infrastructure and utilities, land use, socioeconomics and environmental justice, and water resources.

The subsections presented throughout the remainder of this chapter provide a concise summary of the current affected environment within the ROI and an analysis of the potential effects to each resource area considered from implementation of the No Action Alternative and the Proposed Action.

Table 3-1. Resource Areas Screened from Further Analysis

Resource Area	Rationale
Air Quality	<p>The proposed annex is located within Savannah, Georgia, which is in attainment for all National Ambient Air Quality Standards. Construction would result in short-term, minor, adverse effects and long-term negligible effects to air quality. Construction would involve equipment that would temporarily increase air emissions and fugitive dust. But such emissions would be reduced by standard construction best management practices. Operation of the new annex would have minimal air emissions. The new annex would have a natural gas-fired emergency generator which would have reduced emissions compared to diesel generators. The 1996 Courthouse Annex EIS provides further analysis of potential effects to air quality due to construction and operation of a new annex. Considering the previous analysis along with current conditions and the currently proposed project, air quality is not carried forward for further analysis within this EA.</p>
Biological Resources (including Threatened and Endangered Species)	<p>The proposed annex would be constructed on a site currently occupied by existing federal buildings. The site has previously been disturbed, but construction activities would still alter as little of the existing vegetation as possible. The design involves removal of some existing trees on the property, but several existing trees would be preserved. The design includes new ornamental and shade trees to compliment the new annex. Significant and healthy trees would be protected in accordance with the City of Savannah’s Landscape and Tree Protection Ordinance of 2017, and any removed trees would be mitigated by replanting or paying a fee.</p> <p>As the site is located in an urban area surrounded by other disturbed or developed blocks, no suitable habitat for threatened or endangered species would be disturbed under the Proposed Action. In correspondence dated May 29, 2018, the USFWS stated that they do not have concerns regarding the Proposed Action relative to the Endangered Species Act, federally listed, and at-risk species.</p> <p>Due to the location of the Proposed Action and the previously disturbed nature of the site, impacts to biological resources are expected to be negligible. The 1996 Courthouse Annex EIS provides further analysis of potential effects to biological resources due to construction and operation of a new annex. Considering the previous analysis along with current conditions and the currently proposed project, biological resources are not carried forward for further analysis within this EA.</p>
Geology and Soils	<p>The proposed annex would be constructed on a previously disturbed site within a developed urban area. No new blasting or new ground disturbance to undeveloped land would result from implementation of the Proposed Action. Soils disturbed during construction activities would be replaced, regraded, and reseeded. The 1996 Courthouse Annex EIS provides further analysis of potential effects to geology and soils due to construction and operation of a new annex. Considering the previous analysis along with current conditions and the currently proposed project, geology and soils are not carried forward for further analysis within this EA.</p>
Health and Safety	<p>Construction activities are innately hazardous, but would be mitigated and handled by the demolition and construction contractors. These concerns lie outside the scope of this EA and GSA’s Proposed Action. The Proposed Action would not present any additional health and safety concerns to onsite employees or visitors, and this resource is not discussed further within this EA.</p>
Infrastructure and Utilities	<p>The proposed annex would connect to existing utilities. Refer to Section 2.5.1 for details about tie-in type and location. None of these proposed connections for the Proposed Action would require extensive trenching or the construction of new utility lines. The construction of the proposed annex would be expected to result in an overall decrease in utility use as compared to the utilities used by the existing two annex buildings (prior to closure). Under the Proposed Action, use of two annex buildings (one existing and one new) would be expected to result in a net decrease in energy consumption due to the new building being more energy efficient. Exact energy and utility use would depend on the tenant and usage of the remaining annex building. The proposed annex would be constructed to meet LEED Gold</p>

Resource Area	Rationale
	building standards and all associated energy efficiencies. The 1996 Courthouse Annex EIS provides further analysis of potential effects to infrastructure and utilities due to construction and operation of a new annex. Considering the previous analysis along with current conditions and the currently proposed project, infrastructure and utilities are not analyzed further within this EA.
Land Use	<p>The Proposed Action would not affect land use planning or zoning. The proposed annex would be constructed at the site of an existing federal building in a developed urban area. No changes to land use or land use designations would result from implementing the Proposed Action.</p> <p>The 1996 Courthouse Annex EIS provides further analysis of potential effects to land use due to construction and operation of a new annex. Considering the previous analysis along with current conditions and the currently proposed project, land use is not analyzed further within this EA.</p>
Socioeconomics and Environmental Justice	<p>Socioeconomics is defined as the basic attributes and resources associated with the human environment, particularly population and economic activity. The Proposed Action would not result in any appreciable effects to the local or regional socioeconomic environment. Construction of the proposed annex would have minor beneficial effects associated with temporary employment of construction personnel and transportation of goods and materials to the construction site. Approximately 48 people would work in the new annex, 34 of which would include existing staff from the Tomochichi Courthouse. The balance of 14 people would be newly hired employees, which would result in minor beneficial effects associated with new employment positions. There would be no permanent change in sales volume, income, employment, or population because of the Proposed Action.</p> <p>The Proposed Action would be located in an area with over 50 percent minority population. The Proposed Action would involve construction and operation of a new courthouse annex at a location that provides similar courthouse services and would not affect features of environmental justice. As a result, there would be no effects on environmental justice or the protection of children, as the Proposed Action would not result in disproportionate adverse environmental or health effects on low-income or minority populations or children. The 1996 Courthouse Annex EIS provides further analysis of potential effects to socioeconomics and environmental justice due to construction and operation of a new annex. Considering the previous analysis along with current conditions and the currently proposed project, no adverse socioeconomic or environmental justice impacts would result from implementation of the Proposed Action.</p>
Water Resources (Surface Water, Groundwater, Wetlands, Floodplains)	The proposed location for the new annex is a developed block of an urban neighborhood. No wetlands or surface waterbodies, including streams, lakes, and wetlands, exist at the site. Groundwater would not be used during or affected by implementation of the Proposed Action. The project site is located outside of the 100- and 500-year floodplain. The 1996 Courthouse Annex EIS provides additional details about water resources. Considering the previous analysis along with current conditions and the currently proposed project, water resources are not carried forward for further analysis within this EA.

EA = Environmental Assessment; EIS = Environmental Impact Statement; GSA = General Services Administration; LEED = Leadership in Energy and Environmental Design; USFWS = U.S. Fish and Wildlife Service

3.2 CULTURAL RESOURCES

The NHPA of 1966 (36 CFR 800) provides for the identification, evaluation, and preservation of cultural resources. Section 106 of the NHPA requires federal agencies to consider effects of undertakings on resources listed in, or eligible for inclusion in, the NRHP through a process of consultation. The process for compliance with Section 106 consists of the following steps:

1. Establishment of an area of potential effect (APE). This is defined as the area in which eligible properties may be affected by the proposed undertaking, including direct effects and indirect effects (such as visual, audible, and changes which affect the character and setting of the property).
2. Identification of cultural resources located within the APE of a proposed undertaking. This is accomplished through review of existing documentation and field surveys.
3. Cultural resources evaluation is conducted using NRHP criteria. Properties that meet the criteria are considered eligible for listing in the NRHP and are subject to further review under Section 106. Properties that do not meet the criteria are considered not eligible for inclusion in the NRHP and are generally not subject to further Section 106 review.
4. Determination of effect of the proposed undertaking is assessed on properties that meet the NRHP criteria. One of the following effect findings would be made: *No Historic Properties Affected*, *No Adverse Effect*, or *Adverse Effect*.
5. Resolution of adverse effects/mitigation occurs when adverse effects are found. Consultation continues between the federal agency and consulting parties to attempt resolution. Successful consultation results in an agreement of the efforts to be taken to avoid or mitigate adverse effects.

The significance of historic properties is judged against a property's ability to meet the following four criteria for inclusion on the NRHP (36 CFR 60.4):

- Criterion A: Association with events that have made a significant contribution to the broad patterns of our history; or
- Criterion B: Association with the lives of persons significant in our past; or
- Criterion C: That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- Criterion D: That has yielded, or may be likely to yield, information important in prehistory or history.

Properties may be eligible for the NRHP for contributions at the national, state, or local level. Ordinarily, properties achieving significance within the last 50 years are not considered eligible unless they are integral parts of historic districts or unless they are of exceptional importance. The most common types of properties less than 50 years old listed on the NRHP are works of modern architecture or scientific facilities. In practice, Criterion A through C generally apply to historic structures and districts, while Criterion D generally pertains to archaeological resources. Additionally, in order for a structure or building to be listed in the NRHP, it must possess historic integrity of those features necessary to convey its significance (i.e., location, design, setting, workmanship, materials, feeling, and association; see National Register Bulletin #15, *How to Apply the National Register Criteria for Evaluation*) (NPS 2002).

3.2.1 Affected Environment

3.2.1.1 Area of Potential Effect (APE)

Indirect/Visual Effects

The location of the Proposed Action is in downtown Savannah, Georgia in a dense urban built environment consisting of two- and three-story buildings. Sight distances for the Proposed Action under all alternatives would be limited by surrounding buildings and tree cover. Accordingly, the APE for visual effects to historic properties is limited to 250 feet beyond the project site in all directions. Figure 3.2-1 presents the APE and nearby cultural resource points of interest.

Direct Effects

The APE for direct effects (archaeological resources) is limited to the areas of ground disturbance.

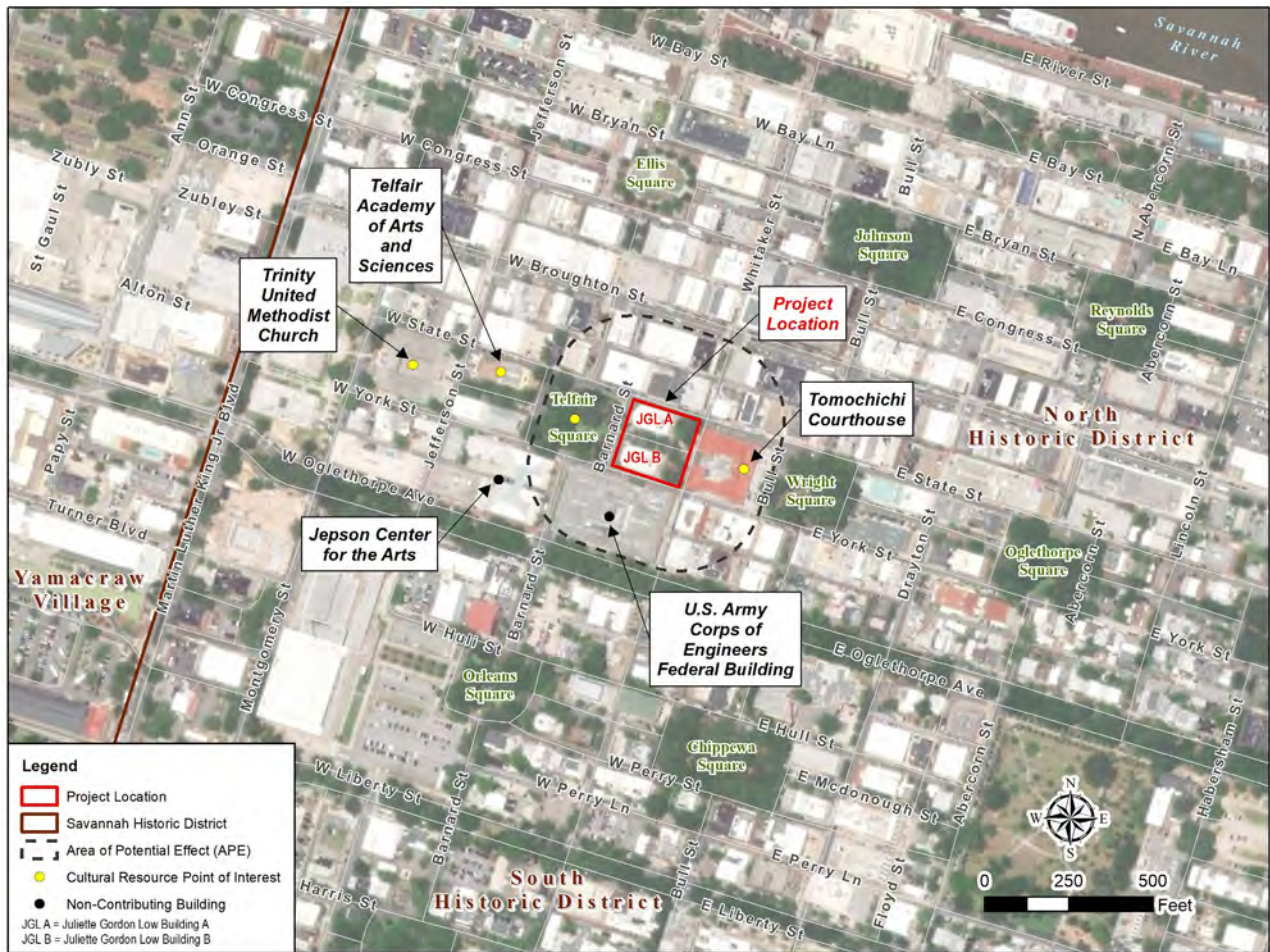


Figure 3.2-1. Cultural Resources Area of Potential Effect

3.2.1.2 Historic Structures and Districts

Savannah National Historic Landmark District

The proposed project site is located within Savannah's National Historic Landmark District (herein referred to as "Savannah Historic District"). As a National Historic Landmark, the district is also listed on the NRHP. The period of significance for the Savannah Historic District extends from 1733 through 1934.

The district has been placed on the U.S. Department of Interior's endangered landmarks list twice due to building demolitions and the threat of incompatible new construction.

Buildings A and B of the JGL Federal Building Complex were constructed in 1985 and are not eligible for the NRHP, nor are they contributing resources to the Savannah Historic District. Although compatible in scale, the Federal Complex buildings have been criticized for lack of compatible materials and design.

The 1996 Courthouse Annex EIS included, as an appendix, a Cultural Resources Assessment that evaluated whether specific buildings within the APE for each alternative being considered at that time "contributed" to the Savannah Historic District based on the NRHP criteria. Significant contributing resources within the current APE include the Tomochichi Courthouse, constructed in 1899 and expanded in 1931. The Tomochichi Courthouse is a U-shaped, three-story marble and granite building designed in the Italian Renaissance Revival style. It sits on two west trust lots facing Wright Square. The lots have been the location of court buildings for 200 years.

Immediately west of the JGL Buildings A and B lies Telfair Square. The square, laid out as St. James Square in 1733 by James Oglethorpe and renamed Telfair Square in 1875, has a landscape design dating from 1962 (Sullivan et al. 2017).

The 1820 Telfair Academy of Arts and Sciences, designed by English architect William Jay, was Georgia's first public museum. It is located on the northwest trust lot west of Telfair Square. The southwest trust lot is home to the Trinity United Methodist Church, designed by John B. Hogg and constructed in 1848 (Sullivan et al. 2017).

Areas south and east of Telfair Square and its associated trust lots include a high degree of development that does not contribute to the significance of the Savannah Historic District. Notably, the U.S. Army Corps of Engineers Federal office building directly to the south and the contemporary Jepson Center for the Arts to the southwest. Additional non-contributing elements include parking facilities present at the west end of West President Street, just beyond the western edge of the APE, and surface parking lots north of the JGL Federal Building Complex on State Street (Sullivan et al. 2017).

The Oglethorpe Plan

Of primary significance to the Savannah Historic District is the city's distinctive plan which has survived and grown since its inception in 1733 by James Oglethorpe and the English trustees of the colony of Georgia. The 1996 Courthouse Annex EIS details the plan's significance which is based on units called wards, each named and organized as neighborhoods of equal size. Each ward had a central public square and trust lots both east and west of the square. These trust lots were reserved for important community buildings such as courthouses and churches. North and south of the square were tithing lots reserved for private ownership. The Oglethorpe Plan was the basis for the creation of the Savannah Historic District in 1966 and the Plan has been nominated to the United Nations Education, Scientific, and Cultural Organization's World Heritage List for its outstanding design, unique character, and history.

The Oglethorpe Plan within the Telfair Square trust lots was in large part preserved with the construction of JGL Buildings A and B in 1985 by retaining President Street. The street, which divides the east trust lots of Telfair Square into two equal parcels continues to serve as a street, although through access is restricted. To the east of JGL Buildings A and B, within both the north and south trust lots are small areas of open space separated from Whitaker Street on the east, West York Street on the south and West State Street on the north by a granite and aluminum wall.

3.2.1.3 Archaeological Resources

Savannah's Historic District contains numerous archaeological sites dating from both the prehistoric and historic periods. Archaeological excavations were carried out prior to the construction of JGL Buildings A and B in 1985. As a consequence, the potential for any archaeological resources remaining within the confines of JGL Building B is very low. Due to access issues, archaeological investigations were not carried out within the confines of West President Street. Therefore, there is a potential that intact archaeological remains exist under West President Street.

3.2.2 Environmental Consequences

Consistent with the CEQ regulations for implementing NEPA, impacts to cultural resources are described in terms of type, context, duration, and intensity. These impact analyses are intended, however, to comply with the requirements of both the NEPA and Section 106 of the NHPA. In accordance with the ACHP's regulations implementing Section 106 (36 CFR 800, *Protection of Historic Properties*), a determination of either *adverse effect* or *no adverse effect* must be made for affected NRHP eligible cultural resources. An *adverse effect* occurs whenever an impact alters, directly or indirectly, any characteristic of a cultural resource that qualifies it for inclusion in the NRHP. A determination of *no adverse effect* means there is an effect, but the effect would not diminish in any way the characteristics of the cultural resource that qualify it for inclusion in the NRHP.

3.2.2.1 No Action Alternative

Historic Structures and Districts

Under the No Action Alternative, GSA would not construct the proposed annex. No changes would be made to the existing JGL Buildings A and B. The buildings would likely continue to be viewed as incompatible in materials and design with contributing resources to the Savannah Historic District. Under this alternative, there would be no direct impacts to historic resources. These buildings are currently vacant and unless maintained and occupied, would deteriorate. Assuming that under the No Action Alternative, the buildings continue to be maintained, no indirect impacts to the Savannah Historic District or the Oglethorpe Plan would occur, constituting a finding of No Effect to historic resources in terms of Section 106.

Archaeological Resources

Under the No Action Alternative, GSA would not construct the proposed annex. No changes would be made to the existing JGL Building B or to President Street and therefore no soil disturbance would result. Under the No Action Alternative, no impacts to archaeological resources would occur, leading to a finding of No Effect to archaeological resources in terms of Section 106.

3.2.2.2 Proposed Action

Historic Structures and Districts

Savannah National Historic Landmark District

The Proposed Action is to construct and operate a proposed annex to the existing Tomochichi Courthouse on the site currently occupied by the JGL Building B. Under the Proposed Action, Building B would be demolished and Building A would remain. Limited parking would be available internal to the new annex with existing nearby parking available for annex personnel.

The design of the new annex considers the Savannah Historic District and the Tomochichi Courthouse and maintains the historic trust blocks of the associated Oglethorpe Plan. The design would be of similar scale, massing, design, materials, and façade features of the nearby Tomochichi Courthouse. Under the Proposed Action, the new annex would involve masonry, marble, brick, and metal. To the extent practicable, the materials selected would be similar to and complementary of the Tomochichi Courthouse; such as the Georgia white marble and buff-sand colored brick. The main entrance of the annex under the Proposed Action would face Telfair Square on Barnard Street. The general rhythm of the fenestration, materials, shapes and proportions would be similar to the Tomochichi Courthouse. The proposed annex would be slightly less tall than the courthouse and within the scale of surrounding historic architecture.

The proposed annex would represent an improvement over the present JGL Building B in terms of compatibility with the Savannah Historic District. Long-term direct and indirect impacts to the Savannah Historic District would be minor. Short-term indirect impacts would occur to the Savannah Historic District due to construction noise, altered traffic and pedestrian patterns, and visual intrusions due to construction activities, but as these impacts would be short-term and relatively minor, they would not be considered adverse in terms of Section 106. Any such impacts could be partially mitigated by careful scheduling of construction activities.

The Oglethorpe Plan

Under the Proposed Action, West President Street would remain a viable thoroughfare despite being restricted to through traffic and as such would have negligible impacts to the Oglethorpe Plan. The Proposed Action would be consistent with the Oglethorpe Plan in that trust lots were meant to be utilized as public building spaces and the Proposed Action preserves this intent.

Archaeological Resources

Soils at the site of the existing JGL Building B were previously disturbed in 1985 as a result of its construction. Prior to construction, archaeological excavations were carried out on the site of JGL Building B. However, due to access issues, archaeological investigations were not carried out within the confines of West President Street. In order to investigate the potential for intact archaeological remains under President Street for the Proposed Action, the firm of New South Associates has been contracted as part of the Design Build team to conduct an archaeological survey of West President Street. GSA will continue to consult with the HPD during this process and impacts to archaeological resources, if found to exist, will be mitigated through consultation with the HPD, leading to a finding of *no adverse effect* to archaeological resources.

Agency Consultation and Public Scoping

As discussed in Section 1.7.1, GSA completed a 30-day scoping period for this EA, including a scoping meeting. Appendix B provides information about the scoping process including a summary of comments received and copies of pertinent public meeting documents. During the scoping period, GSA presented four design alternatives, which included a two-story annex building spanning both JGL Buildings A and B, and a three-story annex building at JGL Building B with three design alternatives involving underground parking, surface parking at JGL Building A., and a park-like setting at JGL Building A (see Appendix B).

During the scoping process, GSA received comments from the public and agencies including the SHPO (also known as the HPD of the Georgia Department of Natural Resources), NPS, USFWS, USEPA, Historic Savannah Foundation, and other local organizations. Comments regarding the project were generally focused on potential impacts to both the Oglethorpe Plan and the Savannah Historic District. Specifically, there were concerns regarding the restricted access of West President Street, the potential reduced view of President Street, and the importance of maintaining the trust lots as buildings. Other

comments pertained to the design of the building (i.e., proportions, fenestration, etc.) and landscaping (i.e., tree and vegetation) considerations.

To respond to public and agency feedback, GSA eliminated the four previous design alternatives for further consideration and developed the current design (a three-story building at 124 Barnard Street and retention of JGL Building A at 120 Barnard Street), which is now considered the Proposed Action. Refer to Section 2.4 for additional details regarding the alternatives presented during the scoping period and reasons for dismissal.

As discussed in Section 1.5, GSA completed extensive consultation efforts with consulting parties in accordance with Section 106 of the NHPA. Consulting parties for Section 106 include representatives from the ACHP, NPS, HPD, Chatham County-Savannah Metropolitan Planning Commission, Historic Savannah Foundation, National Trust for Historic Preservation, Telfair Museum, the Beehive Foundation, Savannah Downtown Neighborhood Association, U.S. Courts, U.S. Marshals Service, local elected officials, and other local organizations. GSA conducted Section 106 consulting party meetings to discuss the project and obtain feedback. Table 1-1 includes dates of consulting party meetings.

Historic Preservation Division (HPD)

GSA consulted with HPD throughout the design process. In conjunction with the 1996 Courthouse Annex EIS, the formerly proposed annex design was submitted to the HPD. The 1996 project was determined to have an adverse effect on the Savannah Historic District due to the proposed courthouse annex covering the entire block bounded by Whitaker, Barnard, York, and State Streets and enclosing President Street. A Memorandum of Agreement (MOA) among GSA, HPD, and ACHP was executed in 1999 in order to resolve the adverse effects. Due to the absence of appropriated funding, the initially proposed project was never implemented and in 2017, consultation began towards a redesigned project that would be more sympathetic to both the Savannah Historic District and the Oglethorpe Plan.

In May 2018, GSA presented a revised conceptual design to HPD that included the demolition of both JGL Buildings A and B and the alternatives listed in Appendix B. Correspondence from the HPD on June 1, 2018 outlined conditions that, based on the conceptual plans, would result in a finding of *no adverse effect* to historic properties for the proposed project (see Appendix A):

Condition 1. The parking lot enclosure for the North Trust Lot should provide a visual representation of a building. In this context, corner structures (walls) should approach the scale of at least a 1-story building with intermediate space filled with materials inferring storefronts. HPD should be given the opportunity to review and comment on associated parking lot enclosure plan revisions, as they become available, prior to proceeding with the work to ensure no change in the effects assessment and consistency with the Secretary's *Standards*.

Condition 2. West President Street between Whitaker and Barnard Streets should remain visually open. In this context, existing pavement and curbing should be retained to the maximum extent feasible and gates/fencing crossing the street should be un-opaque. HPD should be given the opportunity to review and comment on associated street plan revisions, as they become available, prior to proceeding with the work to ensure no change in the effects assessment and consistency with the Secretary's *Standards*.

Condition 3. HPD should be given the opportunity to review and comment on the preliminary construction plans and documents, 75 percent complete construction plans, and any significant changes to the 90% complete construction plans, as they become available, prior to proceeding with the work to ensure no change in the effects assessment and compliance with the Secretary's *Standards*.

In August 2018, GSA revised the conceptual design plans representing the Proposed Action as analyzed in this EA and submitted to the HPD in response to Condition 3 on September 17, 2018 (see Appendix A). On October 1, 2018, the HPD responded that Condition 1 was no longer applicable and that the project was progressing in accordance with Condition 3. Additionally, HPD concurred that the subject project, as proposed, would have *no adverse effect* to historic properties within its APE and would meet the Secretary of the Interior's *Standards for the Treatment of Historic Properties*, provided the following revised condition was met:

Condition 2. West President Street between Whitaker and Barnard Streets should remain visually open. In this context, security enhancements and controlled vehicular access should be achieved without use of solid gates or fencing. HPD should be given the opportunity to review and comment on proposed plans for West President Street, as they become available, prior to proceeding with the work to ensure no change in the effects assessment and consistency with the Secretary's *Standards*.

Advisory Council on Historic Preservation (ACHP)

Comments from the ACHP dated May 18, 2018 noted that GSA's design as proposed at the time "dramatically avoids and minimizes many anticipated adverse effects to historic properties, while accommodating the revised courts program" as compared to the design being considered at the time of the 1999 MOA. The ACHP encouraged GSA to continue consultation with consulting parties and consider alternatives which meet the needs for the current undertaking as well as potential expansion in order to address long-term preservation and stewardship goals in the Savannah Historic District (see Appendix A).

On October 16, 2018 the ACHP responded to the Proposed Action considered in this EA, noting that the "Design marks a significant departure from GSA's initial undertaking, but also the undertaking as set out in the 1999 *Memorandum of Agreement, U.S. Courthouse Annex, Savannah, Georgia*, among GSA, HPD, and ACHP (MOA), dramatically improving upon that considered almost two decades ago, and is of great benefit to historic properties." As a result, GSA plans to terminate the existing MOA since it was prepared in 1999 for an old design of the annex (four-story building with underground parking and connection to the Tomochichi Building). Since the design has changed, the MOA is no longer valid. GSA will coordinate with the ACHP and HPD to proceed with termination of the existing MOA. The ACHP encouraged GSA to continue towards the completion of the Section 106 Review Process (see Appendix A).

National Park Service (NPS)

In a letter dated June 14, 2018, the NPS provided GSA with comments and feedback regarding the new annex building design and consideration of the Oglethorpe Plan and the Savannah Historic District. The letter explained that in order to maintain the Historic District designation, "historic properties must possess a high degree of integrity" and encouraged GSA to consider the proposed project within the context of the larger Historic District.

On October 10, 2018, the NPS agreed with GSA's finding of *no adverse effect* in response to an email dated September 17, 2018, notifying the consulting parties of GSA's finding of *no adverse effect* (see Appendix A).

Section 106 Summary

The Proposed Action would have minor direct and indirect, long-term impacts and minor short-term, indirect adverse impacts on the Savannah Historic District. Implementation of the condition set forth by the HPD would minimize resulting impacts to the Oglethorpe Plan. As a result, there would be a finding of *no adverse effect* to the Savannah Historic District and the Oglethorpe Plan.

3.2.2.3 Measures to Avoid, Minimize and Mitigate Impacts

Since GSA has implemented design changes to ensure no adverse effects would be anticipated, no further mitigation would be required beyond continuing consultation through the final design process. The changes included: re-designing the building to be more compatible with historic buildings within the district by designing a three-story building with slightly less height than the Tomochichi Courthouse; restricting the building to the south trust lot and not building over President Street; designing a building that has similar size, massing, and scale as well as materials to the Tomochichi Courthouse and nearby Telfair Museum; providing a clear, central entrance location for the building; adding appropriate landscaping around the project area and retaining existing mature trees to the extent practicable; and clearly defining President Street as a street, distinguished by hardscape material.

3.3 TRANSPORTATION AND PARKING

3.3.1 Affected Environment

The Proposed Action would construct and operate a proposed new three-story annex at 124 Barnard Street and retain the existing JGL Building A at 120 Barnard Street. The site is bounded by State Street, Whitaker Street, York Street, and Barnard Street and is located within the Savannah Historic District. West President Street, currently closed to through traffic, divides the site into two equal parcels.

3.3.1.1 Transportation

Traffic

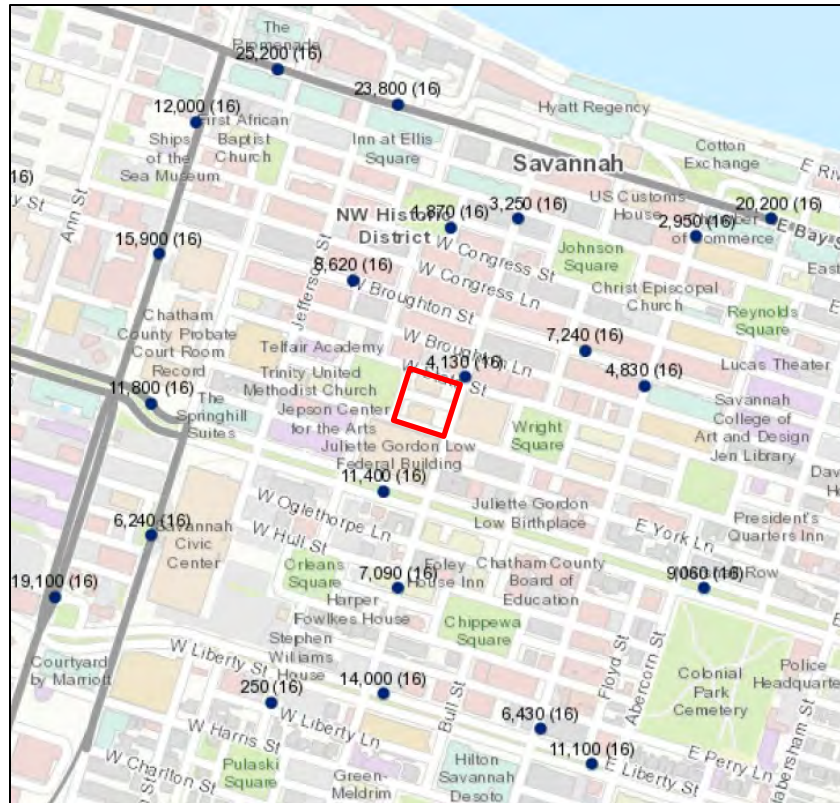
The City of Savannah and its suburbs are served by a grid of expressways, arterials, collectors, and local roads. Major highways carrying traffic through the area include Interstates (I-) 16, 95, and 516; U.S. Highways 17 and 80; and Georgia Highways 21 and 206. Roads providing access to the Savannah Historic District include I-16, Bay Street (U.S. 80), Louisville Road, and Gwinnett Street from the west; President, Wheaton, and Gwinnett Streets from the east; and East Broad Street, Martin Luther King, Jr. Boulevard, Drayton Street, and Montgomery Street from the south.

The Savannah Historic District is bounded to the north by the Savannah River. The Savannah Historic District has a grid pattern of streets interrupted by squares containing public spaces and a mix of commercial, office, and residential buildings. Major streets in the vicinity of the Proposed Action can be viewed in Figure 3.3-1 and include Broughton Street, Oglethorpe Avenue, and Liberty Street. The Cumulative Effects analysis in Section 3.6 discusses planned road improvements.

The Georgia Department of Transportation maintains a network of traffic count stations in the vicinity of the Proposed Action (GeoCounts 2018). Figure 3.3-1 shows nearby traffic count locations with recent annual average daily traffic (AADT) count data. Broughton Street and Oglethorpe Avenue are major thoroughfares located two blocks north and south of the site, respectively, with AADT counts of 8,620 and 11,400. Whitaker Street, which bounds the site to the east, has an AADT count of 4,130.

Traffic conditions are often analyzed using the Level of Service (LOS) concept defined by the Highway Capacity Manual (Transportation Research Board 2010). LOS is represented by a letter between A (free-flowing traffic) and F (highly congested traffic). LOS C, which represents stable flow with speed and maneuverability restricted by the amount of traffic, is usually considered to be an acceptable goal in traffic engineering. While traffic circulation within the Savannah Historic District is generally satisfactory with a LOS of C or better, there are areas where traffic movement drops below satisfactory levels during peak times. A traffic study along Montgomery Street and Martin Luther King, Jr. Boulevard, along the western edge of the Savannah Historic District, found that intersections in this corridor generally operated at LOS C or better (Jacobs 2015). However, the intersection of W. Oglethorpe Ave and Martin Luther King, Jr. Boulevard was observed to operate at LOS F during peak traffic. The I-16 on-ramp from Gwinnett Street also experiences LOS F during peak traffic.

Another analysis found that in 2010, segments of Bay Street (U.S. 80), Liberty Street, Oglethorpe Ave, Montgomery Street, and Martin Luther King, Jr. Boulevard experienced LOS D or E during peak traffic times (CORE MPO 2016). Portions of these streets are projected to decrease to LOS F by 2040, while LOS D and E are likely to occur more widely throughout the Savannah Historic District. These projections assume that recommendations in the Savannah Total Mobility Plan will be fully implemented by 2040. The Cumulative Effects analysis in Section 3.6 discusses the Savannah Total Mobility Plan.



Source: GeoCounts 2018

Note: The proposed site is shown in red.

Figure 3.3-1. Traffic Count Data for the Proposed Site

Public Transportation

Mass transit in Savannah is provided by the Chatham Area Transit (CAT) Authority, which runs daily bus service. CAT currently runs 16 fixed bus routes 7 days a week, many of which provide access to downtown Savannah via the Joe Murray Rivers Intermodal Transit Center (Chatham Area Transit 2016). The Transit Center is located just west of the Savannah Historic District, approximately 0.4 miles from the project site. In addition, two CAT routes run along Broughton Street, two blocks north of the site, and four routes run along Oglethorpe Avenue two blocks south of the site. Stops along these routes are located within 0.1 mile of the site.

The City of Savannah operates free circulator shuttles along two routes within the Savannah Historic District, which connect parking facilities with sites of interest to visitors. Both routes are accessible from the project site. In addition, privately-operated trolley sightseeing tours operating in the Savannah Historic District pass through Telfair Square and along Barnard Street (Historic Tours of America 2018).

Pedestrian and Bicycle Traffic

The Savannah Historic District, which includes the site for the proposed annex, generates a large volume of pedestrian traffic as a result of extensive retail and office facilities, limited parking, and small area. Tourists also create substantial foot traffic in the Savannah Historic District, particularly in the City Market, around the squares and along the riverfront. Savannah Historic District residents and students also contribute to the volume of pedestrian traffic. In the vicinity of the project site, Broughton Street is a commercial corridor that creates pedestrian activity. Redevelopment efforts have focused on the need to establish and maintain patterns of foot traffic that will promote further commercial expansion. Bull Street

is one of the principal routes tourists use to move between the riverfront and the interior of the Savannah Historic District.

Pedestrian traffic counts indicate heavy pedestrian movement along Broughton Street, but lower traffic elsewhere in the Savannah Historic District (CORE MPO 2017a). Approximately 1,000 pedestrians were counted over a 2-hour weekday evening period along Broughton Street; pedestrian counts at other locations within the Savannah Historic District (conducted at similar times of the day) were generally below 100 per 2-hour period. The government buildings around Wright Square and Telfair Square result in a substantial volume of pedestrians during the day, but not on evenings, weekends, or holidays.

Residents and visitors also use bicycles as transportation within the Savannah Historic District. The Historic District has dedicated bike lanes along Price and Lincoln Streets, as well as several streets where signage is used to encourage lane-sharing by bicyclists (CORE MPO 2013). The proposed site is located along an on-street bikeway through the Savannah Historic District that is designated with signage for shared use with bicycles. Barnard Street is one of several popular bicycle corridors within the Savannah Historic District, as are Broughton Street and Oglethorpe Avenue (City of Savannah 2018a). President Street is not specifically identified on any of these bicycle routes. Public bike racks are located at multiple locations within two to three blocks of the site (City of Savannah 2018b).

Recent bicycle counts at several locations in the Savannah Historic District indicate light to moderate bicycle traffic, with 2-hour counts ranging from just below 40 to just above 70 (CORE MPO 2017b). The City of Savannah has installed bike-share facilities at two locations in the Savannah Historic District to further encourage the use of bicycles by residents and visitors, and bike-share facilities are planned at five additional locations (Savannah Bicycle Campaign 2016).

3.3.1.2 Parking

Parking facilities in the Savannah Historic District consist of off-street garages and surface lots, as well as metered and unmetered (time-limited) on-street parking. Off-street parking facilities are operated by the City of Savannah and by private operators. According to a recent survey, the northern portion of the Savannah Historic District (north of Gaston Street) contains approximately 5,700 on-street parking spaces, and approximately 11,200 off-street parking spaces (Nelson/Nygaard Consulting Associates 2015). The area north of Gaston Street included in the survey was approximately 1 mile (east to west) by 0.8 miles (north to south). The proposed site is located in the north-western quadrant of the survey area.

Three city-operated parking garages and one city-operated surface lot are located within 0.25 miles of the proposed site, with a total of 2,262 parking spaces. Table 3.3-1 lists off-street parking facilities operated by the City of Savannah. Additionally, privately-operated parking facilities are located in the vicinity of the proposed site; however, comparable data was not available for those facilities.

Off-street parking spaces typically experience moderate to high rates of utilization in the Savannah Historic District. On typical weekdays, off-street parking north of Gaston Street is most highly utilized between the hours of 11 a.m. and 3 p.m., with approximately 60 percent of all spaces occupied during these hours (Nelson/Nygaard Consulting Associates 2015). Note that this includes all city-operated as well as privately-operated parking facilities. Utilization varies considerably across facilities, with some facilities experiencing greater than 90 percent occupancy during peak hours while occupancy rates at other facilities remain below 60 percent. As shown in Table 3.3-1, the four city-operated off-street parking facilities located within 0.25 miles of the proposed site experience occupancy rates ranging from 60 to above 90 percent. In addition, privately-operated parking garages typically experience an average of 70 percent occupancy during peak times, while private surface lots experience 50 to 60 percent occupancy.

Table 3.3-1. Parking Facilities Operated by the City of Savannah

Facility Type	Name	Address	Number of Spaces (Peak Occupancy)	Distance from Proposed Site ^a
Parking Garage	Bryan Street Parking Garage	100 E. Bryan St.	497 (90%-100%)	0.4 mi
Parking Garage	Liberty Street Parking Garage	301 W. Liberty St.	831 (below 60%)	0.4 mi
Parking Garage	Robinson Parking Garage	132 Montgomery St.	520 (90%-100%)	0.1 mi
Parking Garage	State Street Parking Garage	100 E. State St.	452 (90%-100%)	0.2 mi
Parking Garage	Whitaker Street Parking Garage	7 Whitaker St.	1,065 (60%-80%)	0.2 mi
Surface Lot	River Street Parking Lot 1	Barnard Ramp and River St.	29 (90%-100%)	0.3 mi
Surface Lot	River Street Parking Lot 2	Barnard Ramp and River St.	31 (90%-100%)	0.3 mi
Surface Lot	River Street Parking Lot 3	Abercorn Ramp and River St.	50 (90%-100%)	0.5 mi
Surface Lot	Savannah Civic Center Parking Lot	Liberty and Montgomery	225 (80%-90%)	0.2 mi
Surface Lot	Savannah Visitor Center	301 Martin Luther King, Jr. Blvd.	298 (90%-100%)	0.4 mi

Source: City of Savannah 2018c; Nelson/Nygaard Consulting Associates 2015

^a Distances estimated using the shorted walking route provided by Google Maps (<https://www.google.com/maps/>).

On-street parking in the Historic District consists of metered and unmetered parking and includes both time limited and non-time limited parking spaces (Nelson/Nygaard Consulting Associates 2015). There are approximately 5,700 on-street parking spaces north of Gaston Street. In the vicinity of the Proposed Action, on-street parking is available on State Street, Barnard Street, York Street, President Street, Oglethorpe Avenue, and Broughton Street, as well as many other surrounding streets. As with the rest of the Savannah Historic District, these spaces consist of a mix of metered, free, time limited, and non-time limited spaces. Parking along Broughton Street, however, consists primarily of free, time-limited spaces with varying time limits (Nelson/Nygaard Consulting Associates 2016).

On-street parking in the Savannah Historic District is also utilized at high rates, similar to off-street parking (Nelson/Nygaard Consulting Associates 2015). On typical weekdays, on-street parking north of Gaston Street typically reaches 60 percent occupancy by 11 a.m., and remains at this level until after 9 p.m. Time-limited free parking and single-space metered parking are typically utilized at 60 percent or less during weekdays, while multi-space metered parking is utilized at rates up to 80 percent during peak periods. On-street parking spaces in the vicinity of the Proposed Action are typically at least 60 percent occupied by 9 a.m. on weekdays and can experience occupancy rates of 90 percent or more during peak periods.

3.3.2 Environmental Consequences

Table 3.3-2 summarizes impacts to transportation and parking under the Proposed Action and No Action Alternative. Impacts under each alternative are discussed in greater detail below.

Table 3.3-2. Summary of Impacts to Transportation and Parking

Project Phase	Impact Category	No Action Alternative	Proposed Action
Construction	Traffic	No impact	Minor impact
	Public Transportation	No impact	Minor beneficial impact
	Pedestrian and Bicycle Traffic	No impact	Minor impact
	Parking	No impact	Negligible to minor impact
Operations	Traffic	No impact	Negligible impact
	Public Transportation	No impact	Minor beneficial impact
	Pedestrian and Bicycle Traffic	No impact	Negligible impact
	Parking	No impact	Negligible impact

3.3.2.1 No Action Alternative

Under the No Action Alternative, GSA would not construct the proposed new courthouse annex. No changes would be made to the existing annex buildings at JGL Buildings A and B, and the existing conditions would remain unchanged. Traffic levels and parking demand would likely remain at their current levels, and there would be no impacts to traffic and parking.

3.3.2.2 Proposed Action

Construction activities under the Proposed Action would have minor adverse effects on traffic in the immediate vicinity of the proposed site due to trucks entering and exiting the site, as well as periodic, temporary street closures. Impacts to pedestrian and bicycle traffic and public transportation would be minor. Construction workers would increase demand for parking facilities in the vicinity of the construction site; however, there is sufficient parking available near the proposed site and construction activities would have a minor effect on parking availability.

Operations under the Proposed Action would have negligible to minor impacts to traffic and public transportation. Impacts to pedestrian and bicycle traffic would be negligible to minor. There would be an increase in the number of people traveling to the site, which could increase demand for parking in the vicinity of the proposed annex; however, there is sufficient parking available near the proposed site and operations of the proposed annex would have a negligible to minor effect on parking availability.

Construction

As described in Section 2.5.1, construction at the proposed site would likely begin in 2019 and would continue for a period of approximately 20 months. Construction activities would likely peak for a period of approximately 9 months. Up to 70 workers would be present onsite during the period of peak construction, while up to 40 construction workers would be onsite during non-peak times. Construction would occur during normal working hours.

Trucks would enter and exit the site each day to deliver construction materials and haul waste offsite. Up to nine trucks would enter and exit the construction site daily during the peak construction period, while up to three trucks would visit the site each day during non-peak times. Trucks would enter and exit the site

from West State Street. Since all construction activities would take place within the construction site footprint; there would be no material laydown areas outside the construction site. Potential impacts to transportation and parking from construction of the Proposed Action are discussed below.

Transportation

Traffic

Construction would have short-term minor adverse impacts to traffic in the vicinity of the Proposed Action. There would be a minor increase in traffic due to construction workers travelling to the site each day. The increase in truck traffic due to deliveries and waste pickups would be minor. Trucks entering and exiting the construction site on West State Street could cause periodic, minor delays to traffic; however, these would only occur for short periods of time.

Temporary traffic impacts could also occur due to periodic, temporary street closures during construction, which may be needed for certain construction activities such as utility work. All street closures would be coordinated with the City of Savannah and, to the extent practicable, would occur during off-peak traffic hours.

Public Transportation

Construction activities are not expected to cause impacts to public transportation in the City of Savannah. The proposed site is not located on any CAT bus routes. It is possible that some construction workers would utilize public transportation to travel to the construction site, which would be a minor beneficial impact to public transportation services.

Depending on the route taken, trolley tours of the Savannah Historic District may need to be temporarily re-routed to avoid construction activities. Currently, trolley tours pass by the proposed site but there are no designated stops in the immediate vicinity of the proposed site. Therefore, impacts to trolley tours and other tourism activities would be negligible to minor. Any street closures would be coordinated with the City of Savannah, and it is expected that tour operators would be able to re-route to avoid these activities if necessary.

Pedestrian and Bicycle Traffic

Construction would have short-term minor adverse impacts to pedestrian and bicycle traffic in the vicinity of the Proposed Action. Pedestrian sidewalks adjacent to the construction site would be closed, which may cause a minor adverse impact on pedestrian traffic in the immediate vicinity of the site. Sidewalks on the opposite side of the street would remain open. Appropriate signage would be used to indicate sidewalk closures and direct pedestrians to the nearby open sidewalks.

Construction traffic entering and exiting the site, as well as temporary street closures, may adversely affect bicycle traffic in the immediate vicinity of the site. However, these impacts would be temporary and intermittent.

Parking

Construction would have short-term minor adverse impacts on parking in the vicinity of the Proposed Action. Construction workers traveling to the site would generate additional demand for parking services. As discussed above, up to 70 workers would travel to the site each day during periods of peak construction, and up to 40 workers during other times. While on-street parking in the vicinity of the Proposed Action typically experiences high occupancy rates, there is sufficient off-street capacity in nearby parking garages and surface lots to accommodate worker vehicles.

Table 3.3-3 presents conservative estimates of typical weekday parking availability at city-operated parking facilities near the proposed site, based on peak occupancy rates that typically occur between the hours of 11 a.m. and 3 p.m. There would be sufficient capacity within these parking facilities, especially at the Whitaker Street Parking Garage and the Liberty Street Parking Garage, to accommodate construction worker vehicles without adversely affecting parking availability. Note that this analysis does not include privately-operated parking facilities near the construction site that would also be available for use. Localized effects could still occur, such as having to search longer for available parking spaces if a number of construction workers utilize the same parking facility, but these effects would be minor and temporary. As a best management practice, construction workers would be directed to use off-street parking to minimize impact on availability of on-street parking.

Table 3.3-3. Estimated Parking Availability

Facility	Number of Spaces	Peak Occupancy	Available Spaces ^a
Bryan Street Parking Garage	497	90%-100%	0
Liberty Street Parking Garage	831	Below 60%	332
Robinson Parking Garage	520	90%-100%	0
State Street Parking Garage	452	90%-100%	0
Whitaker Street Parking Garage	1,065	60%-80%	213
Savannah Civic Center Parking Lot	225	80%-90%	22
Total	3,590	--	567

Source: Developed from City of Savannah 2018c and Nelson/Nygaard Consulting Associates 2015.

^a Estimated using the following formula: Available spaces = (100% – Upper limit of peak occupancy %) x Number of spaces. A less conservative approach using the mid-point of the occupancy range instead of the upper limit yields a total of 758 available parking spaces.

Operations

During operations, Federal Court functions and services that are currently provided at the Tomochichi Courthouse, including bankruptcy and probation services, would be transferred to the proposed annex. There would be no net increase or change in the types of services provided, and therefore the total number of visitors and customers to the Tomochichi Courthouse and the annex would not change compared to current conditions. Staff at the annex would include the Chief Bankruptcy Judge and accompanying chambers staff, a Visiting Bankruptcy Judge and staff, the Bankruptcy Clerk and staff, Court Security offices under the U.S. Marshals Service, probation officers and accompanying administrative staff, and GSA building management and facilities maintenance staff. The annex would employ a total of approximately 48 staff, of which 34 would be existing employees moved from the Tomochichi Courthouse and the remaining 14 would be new hires.

Table 3.3-4 compares baseline conditions that existed prior to abandonment and closure of the JGL Buildings A and B and relocation of onsite staff, to projected future conditions after the annex is operational. There would be a net increase of, on average, 18 daily users once the annex is operational compared to baseline conditions. However, the number of visitors would likely vary considerably depending on whether bankruptcy hearings are being held on any given day. On days when there are no bankruptcy hearings, the number of people (staff and visitors) arriving at the annex would be approximately 5 more than the baseline. On days when the Bankruptcy Court is in session, there could be as many as 70 additional people traveling to the annex as compared to the baseline. This spike in traffic would occur, on average, no more than once per week.

Table 3.3-4. Estimated Number of Average Daily Users (Staff and Visitors) at the Annex

Timeframe	Facility	Estimated Staff	Visitors Per Month	Average Daily Users
Baseline Condition ^a	North Trust Lot	20	300	35
	South Trust Lot	18	50	20
	Baseline Total	38	350	55
Proposed Action - Operations	Annex	48	500	60-125 ^b (avg. 73)
Net Change	--	+10	+150	+5-70 (avg. 18)

Source: Developed from City of Savannah 2018c and Nelson/Nygaard Consulting Associates 2015.

^a Baseline Conditions represent conditions prior to closure of the JGL Buildings A and B.

^b The actual number of visitors per day is likely to vary considerably depending on whether bankruptcy hearings are being held on a given day. These hearings are held, on average, once a week, leading to an increase in visitors on those days. Probation hearings and related services are provided daily and draw a steady number of daily visitors.

The annex would include two secured onsite parking spaces for approved personnel per program requirements. West President Street would remain GSA-owned property and would continue to be a limited or restricted access road. West President Street would provide approximately 11 surface parking spaces per program requirements. Annex personnel would continue to use existing secured parking that is located nearby.

Transportation

Traffic

There would be negligible to minor impacts to traffic due to operations of the Proposed Action. Personnel traffic to access nearby parking would not noticeably impact the local traffic conditions. Similarly, an increase of up to 70 visitors per day would not have a noticeable impact on general traffic conditions in the Savannah Historic District. Additionally, these visitors would likely travel to and park at different locations and at different times, which would ensure that any increase in traffic under the Proposed Action would be spread out throughout the day and across the surrounding area.

Public Transportation

The increase in visitors to the annex would not adversely affect public transportation services. With the increase in visitors to the annex, it is possible that some of those visitors may take public transportation to the site. This would be a minor beneficial impact to public transportation services.

Operations under the Proposed Action would not be likely to have an effect on trolley tours and other tourism activities in the surrounding area.

Pedestrian and Bicycle Traffic

Operations under the Proposed Action would cause negligible impacts to pedestrian traffic. Although West President Street would continue to be a limited or restricted access road for parking of only approved personnel per program requirements, the sidewalk would continue to be used for general public pedestrian traffic. Pedestrians who currently use West President Street to cross from Telfair Square to Whitaker Street would continue to use the sidewalk.

Impacts to bicycle traffic are expected to be negligible, since use of West President Street would be consistent with existing conditions.

Parking

Visitors to the annex would likely use one of the parking garages near the proposed site. Visitors to the Tomochichi Courthouse are currently directed to use city-operated parking garages, and it is assumed that visitors to the annex would continue to use these garages for parking (U.S. District Court 2018).

Operations under the Proposed Action would, on average, draw up to 18 additional staff and visitors to the area as compared to baseline conditions; however, on any given day the number of additional staff and visitors could vary from as low as 5 to as high as 70 (see Table 3.3-4). As previously discussed, an increase in visitors corresponding to the upper end of this range (i.e., 70 additional visitors) would only occur once per week, on average. On all other days, the number of visitors to the annex would likely be close to average levels.

As shown in Table 3.3-3, there is sufficient parking in the area to absorb the upper end of this increase without an adverse effect on parking availability. Localized effects could still occur on some days, such as visitors to the downtown area having to search longer for available parking spaces if a significant number of staff and visitors to the annex happen to utilize the same parking facility. However, these effects would likely be infrequent and would be unlikely to occur frequently. As a result, impacts to parking from the operation of the courthouse annex are expected to be negligible.

3.4 NOISE

3.4.1 Affected Environment

3.4.1.1 Noise Overview

Sound is a physical phenomenon consisting of vibrations that travel through a medium, such as air, and are sensed by the human ear. Noise is defined as any sound that is undesirable because it interferes with communication, is intense enough to damage hearing, or is otherwise intrusive. Human response to noise varies depending on the type and characteristics of the noise, distance between noise source and receptor, receptor sensitivity, and time of day. Noise is often generated by activities essential to a community's quality of life, such as construction or vehicular traffic.

Sound is a physical phenomenon consisting of minute vibrations that travel through a medium, such as air, and sensed by the human ear.

Noise is defined as any unwanted sound. The human ear experiences sound as a result of pressure variations in the air.

Sound varies by both intensity and frequency. The physical intensity or loudness level of noise is expressed quantitatively as the sound pressure level. Sound pressure levels are defined in terms of decibels (dB), which are measured on a logarithmic scale. Sound can be quantified in terms of its amplitude (loudness) and frequency (pitch). Frequency is measured in hertz, which is the number of cycles per second. The typical human ear can hear frequencies ranging from approximately 20 hertz to 20,000 hertz. Typically, the human ear is most sensitive to sounds in the middle frequencies where speech is found, and is less sensitive to sounds in the low and high frequencies.

Since the human ear cannot perceive all pitches or frequencies equally, measured noise levels in dB will not reflect the actual human perception of the loudness of the noise. Thus, the sound measures can be adjusted or weighted to correspond to a scale appropriate for human hearing. The common sound descriptors used to evaluate the way the human ear interprets dB from various sources are as follows:

- **Decibel (dB):** Sound pressure level measurement of intensity. The decibel is a logarithmic unit that expresses the ratio of a sound pressure level to a standard reference level.
- **A-Weighted Decibel Scale (dBA):** Often used to describe the sound pressure levels that account for how the human ear responds to different frequencies and perceives sound.
- **Hertz:** Measurement of frequency or pitch.
- **Equivalent Sound Level (L_{eq}):** The L_{eq} represents the average sound energy over a given period, presented in decibels.
- **Day-Night Average Sound Level (L_{dn}):** Day-night sound level (L_{dn}) is the 24-hour L_{eq} , but with a 10 dB penalty added to nighttime noise levels (10 p.m. to 7 a.m.) to reflect the greater intrusiveness of noise experienced during this time.
- **Sensitive receptors:** Locations or land uses associated with indoor or outdoor areas inhabited by humans or wildlife that may be subject to significant interference from noise (i.e., nearby residences, schools, hospitals, nursing home facilities and recreational areas).

The adjusted scales are useful for gauging and comparing the subjective loudness of sounds to humans. The threshold of perception of the human ear is approximately 3 dB. A 5-dB change is considered to be clearly noticeable to the ear, and a 10-dB change is perceived as an approximate doubling (or halving) of the noise level (MPCA 1999). Table 3.4-1 presents a list of sounds encountered in daily life and their approximate levels in dB.

Table 3.4-1. Perceived Change in Decibel Level

Noise Level (dBA)	Description	Typical Sources
140	Threshold of pain	--
125	Uncomfortably loud	Automobile assembly line
120	Uncomfortably loud	Jet aircraft
100	Very loud	Diesel truck
80	Moderately loud	Motor bus
60	Moderate	Low conversation
40	Quiet	Quiet room
20	Very quiet	Leaves rustling

Source: Liu and Lipták, 1997

dBA = A-weighted sound level in decibels

Ambient or background noise is a combination of various sources heard simultaneously. Calculating noise levels for combinations of sounds does not involve simple addition, but instead uses a logarithmic scale (HUD 1985). As a result, the addition of two noises, such as a garbage truck (100 dBA) and a lawn mower (95 dBA) would result in a cumulative sound level of 101.2 dBA, not 195 dBA.

Noise levels decrease (attenuate) with distance from the source. The decrease in sound level from any single noise source normally follows the “inverse square law.” That is, the sound level change is inversely proportional to the square of the distance from the sound source. A generally accepted rule is that the sound level from a stationary source would drop approximately 6 dB each time the distance from the sound source is doubled. Sound level from a moving “line” source (e.g., a train or vehicle) would drop 3 dB each time the distance from the source is doubled (USDOT 2012).

Barriers, both manmade (e.g., sound walls) and natural (e.g., forested areas, hills, etc.) may reduce noise levels, as may other natural factors, such as temperature and climate. Standard buildings typically provide approximately 15 dB of noise reduction between exterior and interior noise levels (USEPA 1978). Noise generated by stationary and mobile sources has the potential to impact sensitive noise receptors, such as residences, hospitals, schools and churches. Persistent and escalating sources of sound are often considered annoyances and can interfere with normal activities, such as sleeping or conversation, such that these sounds could disrupt or diminish quality of life.

3.4.1.2 Existing Noise Environment

The proposed project would be constructed in downtown Savannah which is in a moderate noise area and not near major highways or other large noise sources. No recent noise studies have been conducted in the City of Savannah near the proposed project area. Since the proposed project area is in the Savannah Historic District and near Wright and Telfair Squares, the area is sensitive to noise due to churches and tourist activity.

The existing noise level in a particular area is generally based on its proximity to nearby major roadways or railroads or on population density (USDOT 2006). The proposed project area is not close to major roadways or railways (classified according to size and frequency of use by medium and heavy trucks). Therefore, ambient noise levels were estimated based on the population density of the City of Savannah in Chatham County using the methodology described in U.S. Department of Transportation’s Transit Noise and Vibration Impact Assessment (USDOT 2006). Considering the population density of the City of Savannah, the existing ambient equivalent continuous sound levels (L_{eq}) are approximately 50 and 40 dBA during daytime and nighttime periods, respectively. Existing L_{dn} levels in the proposed project area are

approximately 50 dBA (USDOT 2006). Ambient (background) noise levels occur from roadway traffic, businesses, pedestrians, and various urban activities.

3.4.1.3 Noise Regulations

The Noise Control Act of 1972 (42 USC 4901) directs federal agencies to comply with applicable federal, state, interstate and local noise control regulations. The primary responsibility of addressing noise pollution has shifted to state and local governments. In 1974, the USEPA published its document entitled *Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin on Safety*, which evaluated the effects of environmental noise with respect to health and safety (USEPA 1974). The document provides information for state and local agencies to use in developing their ambient noise standards. As set forth in the publication, the USEPA provided information suggesting that an $L_{eq(24)}$ of 70 dB is the level above which environmental noise could cause hearing loss if heard consistently over several years. An L_{dn} of 55 dB outdoors and 45 dB indoors is the threshold above which noise could cause interference or annoyance (USEPA 1974).

The proposed project area is zoned as B-C-1 central business zoning district. The City of Savannah outlines noise limitations under the Savannah City Code of Ordinances Part 9, Chapter 2, Article B Noise Control (City of Savannah 2018d). According to Section 9-2034 of the Savannah Noise Control Ordinance, the maximum permissible sound levels allowed for that the proposed project location is 65 dBA. Section 9-2038 of the Savannah Noise Control Ordinance outlines rules for construction noise. It states that construction noise shall not occur between the hours of 7:00 PM to 7:00 AM. During permissible construction hours, construction noise that crosses a real property boundary or within a noise-sensitive area in excess of 85 dBA shall be deemed a noise disturbance.

3.4.2 Environmental Consequences

To evaluate impacts from noise, GSA considered the potential for noise levels to change as a result of the Proposed Action and No Action Alternatives. Considerations of the potential for changes in noise include new mobile and stationary sources from activities associated with construction and operation of the new courthouse annex.

3.4.2.1 No Action Alternative

Under the No Action Alternative, GSA would not construct the proposed new courthouse annex. No changes would be made to the existing annex buildings at JGL Buildings A and B, and the existing noise environment would remain unchanged.

3.4.2.2 Proposed Action

Construction

Moderate, short-term adverse noise impacts would be expected during construction. Construction would take approximately 20 months and involve demolition of existing JGL Building B, excavation for foundations and utility tie-ins, hauling of debris and materials, and construction of the new annex building. The specific types of construction equipment and methods not yet known. Section 5.7.6 of the 1996 Courthouse Annex EIS provides typical construction equipment in Table 5-4. Consistent with the noise analysis in the 1996 Courthouse EIS, it is expected that sensitive receptors could experience noise levels from 76 to 89 dBA at 50 feet. Due to the location of the proposed project area in a densely developed area, there are noise receptors within 50 feet so noise attenuation due to distance would be negligible for those receptors. As a result, the closest noise sensitive receptors could experience construction noise levels above 85 dBA which is deemed a noise disturbance in the Savannah Noise Control Ordinance. Although construction would be temporary, the potential noise impacts would be minimized to the extent possible by standard noise control measures, such as project scheduling, noise barriers, and using noise controls on

equipment (e.g., mufflers). A variance permit from the City of Savannah could be required if construction noise levels cannot be maintained with the limits of the Savannah Noise Control Ordinance. These activities would be consistent with normal construction activities and would be conducted during normal business hours. Variation from normal construction hours may occur due to unforeseen circumstances (e.g., weather) or for specific tasks, but all construction activities would comply with the City of Savannah's noise ordinance.

Operations

Negligible, long-term noise impacts would be expected during operation of the new annex. Due to the nature of the activities associated with the courthouse annex, no new stationary sources of continuous noise are expected. The emergency generator would generate periodic noise during maintenance or for emergency situations which is expected to be minimal. The number of visitors using the annex is anticipated to remain consistent with existing use of those court functions currently provided at the Tomochichi Courthouse. There would be a slight increase in vehicle traffic due to the 14 new employees planned for the annex but the increase is not expected to significantly change the noise environment.

3.5 MATERIALS AND WASTES

3.5.1 Affected Environment

GSA investigated the possibility of hazardous materials or wastes that may be present in the soils or groundwater at the proposed project area. Section 4.2.9 of the 1996 Courthouse Annex EIS details the records reviewed and results of the research. The review found that no underground storage tanks, hazardous waste generators, or hazardous materials spills were reported on the proposed project area. Additionally, GSA evaluated the risk of contamination of the site from prior human activity. This review indicated that the proposed project area has been commercially developed for well over 100 years and the potential that past use could have resulted in contamination of soils or groundwater. The proposed project area contained “Hanley’s Oil Store” in 1884, an electrical substation in 1916, and printing companies in the 1950s and 1960s.

Currently, the two existing annex building are vacant and do not generate waste. Prior to closure, the annex buildings were occupied by GSA, Federal Credit Union, U.S. Department of Labor, U.S. Coast Guard, and U.S. Internal Revenue Service. General office and building waste was generated due to those employees and associated visitors. It is estimated that the approximately 38 employees working at the existing annex buildings prior to closure generated approximately 84 pounds of solid waste per day based on the factor of 2.2 pounds per employee per day.

3.5.2 Environmental Consequences

To evaluate impacts to materials and wastes, GSA considered the potential change in waste generation as a result of the Proposed Action and No Action Alternatives. Considerations of the potential for changes in wastes include changes in employees, visitors, and materials used.

3.5.2.1 No Action Alternative

Under the No Action Alternative, GSA would not construct the proposed new courthouse annex. No changes would be made to the existing annex buildings at JGL Buildings A and B, and the existing conditions would remain unchanged.

3.5.2.2 Proposed Action

Construction

Short-term minor impacts to materials and waste would occur during construction of the new annex. Demolition of the existing annex building would result in construction and demolition waste. Construction and demolition waste would be collected by the construction contractor and sent for recycling or disposal at a state-authorized facility. Since the existing annex buildings were constructed in 1985, hazardous materials are expected to be limited to wastes associated with lighting systems, including fluorescent light bulbs, emergency lights/batteries, and lighting ballasts. To the extent practicable, GSA would ensure that these materials are removed from the structure prior to demolition. If encountered, these hazardous materials/waste would be properly handled by licensed contractors and disposed of in accordance with local and state requirements, consistent with the RCRA. Small amounts of petroleum, lubricants, and oil may be released from heavy equipment during construction. Other wastes would include general waste from personnel and packaging from received hardware.

Operations

Long-term negligible impacts to materials and wastes would occur due to operation of the new courthouse annex. The Proposed Action would require negligible amounts of materials to operate and generate negligible amounts of solid waste.

During operations, all waste from the new annex would be moved by janitorial staff to the Tomochichi Courthouse for disposal and/or recycling by the City of Savannah or Waste Management. It is estimated that the Proposed Action could result in a slight increase in operational waste generation. The approximately 48 employees working at the new annex would generate approximately 106 pounds of solid waste per day based on the factor of 2.2 pounds per employee per day. Due to the increase in employees and visitor usage of the new annex compared to the pre-closure employees and visitor usage, it is anticipated that the new annex could result in a slight increase in operational waste generation compared to the existing annex buildings. Such wastes would be typical of an office setting and would be less than significant.

3.6 CUMULATIVE EFFECTS

As defined by CEQ, cumulative effects are those that “result from the incremental impact of the Proposed Action when added to other past, present, and reasonably foreseeable future actions, without regard to the agency (federal or non-federal) or individual who undertakes such other actions” (40 CFR 1508.7). Cumulative effects analysis captures the effects that result from the Proposed Action in combination with the effects of other actions taken during the duration of the Proposed Action at the same time and place. Cumulative effects may be accrued over time and/or in conjunction with other pre-existing effects from other activities in the area (40 CFR 1508.25); therefore, pre-existing impacts and multiple smaller impacts should also be considered. Overall, assessing cumulative effects involves defining the scope of the other actions and their interrelationship with the Proposed Action to determine if they overlap in space and time.

The NEPA and CEQ regulations require the analysis of cumulative environmental effects of a Proposed Action on resources that may often manifest only at the cumulative level. Cumulative effects can result from individually minor, but collectively significant actions taking place at the same time, over time. As noted above, cumulative effects are most likely to arise when a Proposed Action is related to other actions that could occur in the same location and at a similar time.

3.6.1 No Action Alternative

Implementation of the No Action Alternative would result in no increased potential for adverse cumulative impacts. Construction of the Proposed Action would not occur and the existing annex buildings would remain in place. As such, the No Action Alternative would not contribute to cumulative effects within the City of Savannah.

3.6.2 Proposed Action

This section identifies reasonably foreseeable projects that may have cumulative, incremental impacts in conjunction with the Proposed Action.

Tomochichi Courthouse Renovations and Modernization

GSA announced appropriated funds in Fiscal Year 2016 to modernize the Tomochichi Courthouse. This renovation, along with the new courthouse annex project analyzed in this EA, would allow the judiciary system to meet its current and long-term needs for security, accessibility, and operational efficiency in Savannah, Georgia. The renovation of the Tomochichi Courthouse would include two district courtrooms and three chambers; one magistrate courtroom and chambers; and the district clerk’s office. Construction and renovation are anticipated to begin in Spring 2021 and be completed by Winter 2023 (GSA 2018).

The construction footprint will be finalized during project design but to the extent practicable, GSA would minimize impacts to roadways and sidewalks. GSA could use JGL Building A as temporary office space during renovation of the Tomochichi Courthouse, but such plans would be finalized during project design. This project would have minor adverse cumulative impacts associated with cultural resources and parking. GSA would manage all renovations in a manner to avoid impacts to the historic Tomochichi Courthouse. Construction would increase demand for parking in the local area which would result in a temporary minor impact. Operation of the renovated Tomochichi Courthouse would be similar to existing operations, resulting in long-term negligible cumulative impacts.

Arena

The Savannah City Council approved a contract to construct a new 149,000 square foot, 9,000-seat arena. Located at Stiles Avenue and Gwinnett Street, the new arena would be approximately 1.25 mile southwest

of the proposed annex. Construction is expected to begin in 2018 and would be completed in 2021. During construction, minor adverse cumulative impacts to noise, traffic, and utilities can be expected, however, the current Civic Center will remain open and serve the community while construction occurs. Currently, the City of Savannah does not plan to close the existing Civic Center once the Arena is operational. Nearly 3,000 parking spaces would be needed for the arena. Current plans consider construction of new parking structures to accommodate approximately 920 spaces. Even with the plans for new parking, there will be a deficit in parking, but impacts would be less than significant. The balance of spaces would be fulfilled by existing nearby parking and public/private mass transit. Once the new arena opens, minor beneficial impacts to socioeconomics would be expected as the result of increased capacity and revenue of the new arena (Savannah Now 2017a).

Cultural Arts Center

The City of Savannah will be completing construction of a new two-story 39,000 square foot Cultural Arts Center, adjacent to the new Civic Center. Located at the corner of Montgomery and Oglethorpe Streets, the new Cultural Arts Center would be approximately 0.15 mile southwest from the proposed annex. The new Cultural Arts Center would have a 464-seat theater with a fixed stage, a smaller performance theatre to accommodate 100 seats, five studio classrooms, and gallery space. The construction is expected to be completed in Spring 2019 (City of Savannah 2018e). The new arts center will not offer off-street parking, which could result in minor adverse cumulative impacts to traffic and parking in the area. The Cultural Arts Center will also result in minor beneficial impacts to socioeconomics as a result of the increased capacity and revenue.

Family Resource Center

A new family resource center is slated to be constructed in the City of Savannah. Located on Pennsylvania Avenue, the new center would be approximately 2.2 miles southeast of the proposed annex. The new 18,960-square-foot, two-story center will include offices, a multi-purpose room, a fitness room, art classroom, game room, a computer lab, classrooms, rooms for wellness activities, kitchen and café, and a commercial-style kitchen for teaching culinary arts (City of Savannah 2018f). The construction of the family resource center is expected to be completed in Spring 2019. Minor adverse impacts to noise, traffic, and parking would be expected during construction. Minor beneficial impacts to socioeconomics are expected as a result of new jobs.

Hotels

Choice Hotels recently began construction of the new Cambria Hotel. Located at 321 Montgomery Street in Savannah, the new hotel would be approximately 0.4 mile southwest of the proposed annex. The hotel is planned to have 103 rooms over six-stories and will offer a rooftop bar, multifunctioning meeting space, a business center, and a fitness center. The construction is expected to be completed in 2019. During construction minor adverse impacts to noise and traffic and transportation would be expected (Hotel Management 2018).

A new hotel, the Liberty Hotel, is proposed for 301 Tattnall Street in Savannah which is approximately 0.3 mile southwest of the proposed annex. Construction for a new hotel 301 Tattnall Street and is expected to be completed by Summer 2019 (Hotel Business 2018). The proposed hotel would be 8,470 square feet and will include 111 rooms over five or six-stories and a restaurant bar. Construction for the new hotel would cause minor adverse cumulative impacts to noise, parking, and traffic (Savannah Now 2017b). Minor beneficial impacts to socioeconomics are expected as a result of new jobs.

Streetscape Projects

The City of Savannah is in the process of implementing four streetscape plans throughout the city. The streetscape projects would involve widened sidewalks, new walkways, information kiosks, bike racks and lanes, medians, bioswales, and plantings which would provide safe and walkable streets. Construction of the streetscape projects on Broughton Street, River Street and Bay Street, between Martin Luther King Jr. Boulevard and East Broad Street, is expected to be completed in 2019 (City of Savannah 2018g, 2018h, 2018i). Construction of another streetscape project, on Augusta Avenue, between East Lathrop Avenue and I-516, is also expected to be completed in 2019 (City of Savannah 2018j). The streetscape projects would cause minor adverse impacts to traffic and transportation, noise, and utilities. Multiple travel lane and sidewalk closures can be expected throughout the construction phases of these projects. Consideration of cultural resources and the historic nature of the Savannah Historic District. Long-term beneficial cumulative impacts would be expected once the streetscape projects are operational.

Road Improvements

The Total Mobility Plan: 2040 Metropolitan Transportation Plan is the primary long-range transportation plan for the City of Savannah and surrounding high-population density regions (CORE MPO 2014). The goals highlighted in the Total Mobility Plan include supporting economic vitality; ensuring safety and security; increasing accessibility, mobility, and connectivity; protecting and improving the environment and quality of life; and supporting system management and maintenance and intergovernmental coordination. The Plan identifies several unfunded (cost feasible and vision) projects that support these goals.

The Total Mobility Plan includes several corridor and bridge studies, along with feasibility studies, transportation plans, and transportation improvements and projects. The Total Mobility Plan includes a planned road improvement project in the Savannah Historic District that involves removal and replacement of the I-16 exit ramps and overpass at Montgomery Street and Martin Luther King, Jr. Boulevard. The project would restore part of the original grid system removed when I-16 was constructed. The project is currently scheduled to be funded in 2020. The I-16 ramp removal project identified in the plan has the potential to affect traffic and parking in the Savannah Historic District in the vicinity of the Proposed Action; however, the project is not currently funded and it is not likely that work would begin within the construction timeframe of the Proposed Action (2019 to 2020). The transportation projects described in the Total Mobility Plan would result in typical construction-related impacts to noise, traffic, and transportation but would result in a long-term beneficial impact to transportation and infrastructure.

Parking Garage

A new parking garage is being constructed on River Street in Savannah, adjacent to the Bohemian Hotel and approximately 0.2 mile from the proposed annex. This parking garage will provide 488 parking spaces for hotel guests and the general public (Savannah Now 2016). Construction of this parking garage began in July of 2017 and is expected to be completed by the early 2020. This construction project would have temporary minor adverse cumulative impacts to noise and traffic. Once the project is complete, minor beneficial cumulative impacts to parking, community services, and area socioeconomics are expected (City of Savannah 2018k).

Greenhouse Gases and Climate Change

Climate change is an inherently cumulative effect caused by releases of greenhouse gases from human activities and natural processes around the world. Greenhouse gases are compounds in the atmosphere that absorb and emit radiation, effectively trapping heat (longwave radiation) and causing what is known as the greenhouse effect. The greenhouse effect causes the Earth's atmosphere to warm and thereby create

changes in the planet's climate systems. The primary greenhouse gases in the Earth's atmosphere are water vapor, carbon dioxide (CO₂), methane, nitrous oxide, and ozone. Scientists quantify and analyze greenhouse gases using the common unit of CO₂-equivalents (CO₂-eq), which is based on the global warming potential of each greenhouse gas. CO₂-eq signifies the functionally equivalent amount or concentration of CO₂ that would have the equivalent global warming impact.

During the construction phase, emissions would result from demolition of the existing building, construction of the new annex, and tailpipe emissions from construction worker vehicles, delivery trucks, and construction equipment. Once operational, the new annex building would generate minimal emissions. The new annex would have a natural-gas-fired emergency generator which would have reduced emissions compared to diesel generators. Additionally, the proposed annex would be constructed to meet LEED Gold building standards and all associated energy efficiencies that reduce potential emissions. As a result, the proposed annex would have negligible impacts associated with greenhouse gases and climate change.

3.6.3 Irreversible and Irretrievable Commitment of Resources

NEPA CEQ regulations require environmental analyses to identify "...any irreversible and irretrievable commitments of resources that would be involved in the proposal should it be implemented" (40 CFR 1502.16). Irreversible and irretrievable resource commitments are related to the use of nonrenewable resources and the resulting effects on future generations. Irreversible effects primarily result from the use or destruction of a specific resource (e.g., energy, minerals) that cannot be replaced within a reasonable timeframe. Irretrievable resource commitments involve the loss in value of an affected resource that cannot be restored as a result of the action (e.g., extinction of a threatened or endangered species or the disturbance of a cultural site).

The Proposed Action would not have irreversible impacts on the land because the affected areas could be used for other activities in the future. The primary irretrievable impact of the Proposed Action is from the use of energy, labor, materials, and funds. Irretrievable impacts would result from the use of fuel and other nonrenewable resources for construction and operations. No irreversible or irretrievable commitment of natural or cultural resources is expected to result from the Proposed Action. Implementation of standard operating procedures and the measures identified in this EA for natural and cultural resources would reduce the potential for the irreversible or irretrievable loss of natural or cultural resources as a result of the Proposed Action.

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CHAPTER 4 REFERENCES

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CHAPTER 5 LIST OF PREPARERS

General Services Administration

Ashish Desal, Regional Environmental Program Specialist

Audrey Entorf, Regional Historic Preservation Officer

Joseph Couch, GSA Project Manager

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Brian Whipple, P.E. – Program Manager/Senior Environmental Engineer
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M.A., Certificate of Historic Preservation
B.S., History and Archaeology
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B.S., Environmental Earth Science
4 years of experience

Erin Kouvousis – Environmental Scientist
M.S., Ecology
B.S., Conservation
8 years of experience

Samir Qadir – Environmental Scientist
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B.S., Electronics and Telecommunications Engineering
10 years of experience

Deborah Shinkle – GIS Analyst
B.A., Environmental Studies
14 years of experience

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APPENDIX A AGENCY CORRESPONDENCE

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APPENDIX A AGENCY AND TRIBAL CORRESPONDENCE

A.1 INTRODUCTION

During preparation of the Environmental Assessment (EA), the United States (U.S.) General Services Administration (GSA) actively maintained communication with federal, state, and local government agencies. This appendix summarizes the records of formal consultation between the GSA and these government agencies.

This appendix contains copies of correspondence with the following state and federal agencies:

- Advisory Council on Historic Preservation (ACHP)
- U.S. Fish and Wildlife Service (USFWS) – Southeast Region
- Georgia Department of Natural Resources, Historic Preservation Division
- U.S. National Park Service – Southeast Region

Section A.2 of this appendix contains a representative letter used for correspondence during the scoping period. The letter was sent all stakeholder contacts including the agencies listed above and the following:

- U.S. Army Corps of Engineers (USACE)
- U.S. Environmental Protection Agency (USEPA) – Region 4
- Georgia Department of Natural Resources, Environmental Protection Division
- Georgia Department of Natural Resources, Historic Preservation Division
- Georgia Trust for Historic Preservation
- City of Savannah
- Historic Savannah Foundation

A.2 REPRESENTATIVE SCOPING LETTER



GSA Southeast Sunbelt Region

May 23, 2018

Re: Notice of Public Scoping Meeting– Savannah Courthouse Annex Project

Dear Interested Party:

Pursuant to the requirements of the National Environmental Policy Act (NEPA), the General Services Administration (GSA) Southeast Sunbelt Region announces its intent to prepare a Supplemental Focused Environmental Assessment (EA) to identify and address potential environmental impacts associated with the proposed Savannah Courthouse Annex Project, located in Savannah, Georgia (see Figure 1). GSA will analyze a range of alternatives including the no action alternative for the proposed annex. As part of the EA, GSA will study the impacts of each alternative on the natural, cultural, and social environment. GSA will be consulting under Section 106 of the National Historic Preservation Act, 16 United States Code (USC) 470f and intends to partially fulfill the Section 106 public notification and consultation requirements through the NEPA scoping process.

In 1996, GSA completed an Environmental Impact Statement (EIS) for the *U.S. Courthouse Annex, Savannah, Georgia* to address potential impacts associated with the construction and operation of a courthouse annex to the existing Tomochichi Federal Building and U.S. Courthouse at one of three sites. At the conclusion of the EIS, GSA selected a site, but did not receive construction funds until fiscal year 2016. Upon receiving the authorization and appropriation in 2016, GSA re-initiated the design process.

GSA is pursuing a revised design for the proposed courthouse annex to address the current needs of the Federal Courts and respond to the public and consulting parties feedback received during the development of the conceptual design for the project. The selected site is currently occupied by Buildings A and B of the Juliette Gordon Low Federal Building Complex and is already owned by the government. Under the Proposed Action, the GSA would construct an annex at 124 Barnard Street, Savannah, Georgia. The new courthouse annex would be approximately 35,000 gross square feet in size and include an approximately 11,000 gross square foot secured parking lot at 120 Barnard Street (see Figure 2).

A Public Scoping Meeting will be held on Wednesday June 6, 2018 at the Metropolitan Planning Commission (Arthur Mendonsa Hearing Room), 112 East State Street, Savannah, GA. The meeting will be from 5:30 PM to 8:00 PM. GSA will provide a brief presentation about the project at 6:00 PM and will seek input and answer questions from the community at this meeting.

Interested parties should identify issues and provide comments within their statutory responsibilities that should be considered in the EA on or before Tuesday, June 26, 2018, preferably via email to Ashish Desai at ashish.desai@gsa.gov. The comments can also be sent via mail, postmarked by June 26, 2018.

Thank you.

Sincerely,

Ashish K. Desai

Ashish Desai
Regional Environmental Program Specialist
General Services Administration
Martin Luther King Federal Building
77 Forsyth Street, Atlanta, GA 30303

U.S. General Services Administration
77 Forsyth Street
Atlanta, GA 30303
www.gsa.gov



Figure 1. Project Location Map



Figure 2. Savannah Courthouse Annex Preferred Design (View from Telfair Square near W State Street, looking east-southeast towards the main entrance of the proposed annex.)

U.S. General Services Administration
77 Forsyth Street
Atlanta, GA 30303
www.gsa.gov

A.3 ADVISORY COUNCIL ON HISTORIC PRESERVATION (ACHP)



May 18, 2018

Ms. Audrey Entorf
Regional Historic Preservation Officer
U.S. General Services Administration
Southeast Sunbelt Region 4 (4PED)
77 Forsyth Street, SW
Atlanta, GA 30303

Ref: *Proposed Rehabilitation of the Tomochichi Federal Building and United States Courthouse, and Design and Construction of a New Annex Savannah, Chatham County, Georgia*
ACHPConnect Log Number: 11244

Dear Ms. Entorf:

In an effort to comply with Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations (36 CFR Part 800), GSA is consulting with interested parties and seeking views of the public in its consideration of alternatives for this undertaking that could avoid, minimize, or mitigate adverse effects on historic properties, including Savannah's Oglethorpe Plan National Historic Landmark District (NHLD). The Advisory Council on Historic Preservation (ACHP) is participating in GSA's consultation effort and understands GSA continues to consider alternatives in accordance with these regulations.

GSA's revised concept plan, presented at a consulting parties meeting last week and subsequently released to the public, places the Administrative Office of the U.S. Courts program on a single trust lot and a parking lot on the adjacent lot, in accordance with the comments provided at GSA's earlier consulting parties meeting held this past January. GSA requested comments on the revised concept plan, and ACHP offers the following:

- As a result of GSA's compliance effort, GSA's plan dramatically avoids and minimizes many anticipated adverse effects to historic properties, while accommodating the revised courts program. The plan marks a significant departure from not only GSA's initial concept plan, but also the undertaking detailed in the 1999 *Memorandum of Agreement, U.S. Courthouse Annex, Savannah, Georgia*, among GSA, the Georgia State Historic Preservation Officer, and our agency; and,
- At the consulting parties meeting, GSA stated the undertaking should accommodate the 10-year space needs of the court and court related agencies, and the structure/site will allow for expansion to meet the anticipated 30-year needs of the court. As GSA is required to undertake such planning and actions as may be necessary to minimize harm to the NHLD, to the maximum extent possible (54 U.S.C. § 306107 and the regulations), ACHP encourages GSA to consider alternatives which meet this requirement for both the current undertaking and potential expansion, to address long-term preservation and stewardship goals in the NHLD. Additional

ADVISORY COUNCIL ON HISTORIC PRESERVATION

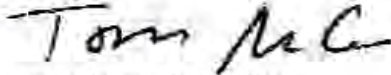
401 F Street NW, Suite 308 • Washington, DC 20001-2637

Phone: 202-517-4020 • Fax: 202-517-6381 • achp@achp.gov • www.achp.gov

discussion regarding GSA's intentions would provide context for the current consultation and an opportunity for ongoing collaboration with the consulting parties.

We appreciate your consideration of our comments. Our participation in this consultation is being handled by Ms. Kirsten Kulis, GSA Liaison, who can be reached at 202-517-0217 or via e-mail at kkulis@achp.gov; please contact her with any questions and reference the ACHPConnect Log Number above.

Sincerely,



Tom McCulloch, Ph.D., R.P.A.
Assistant Director
Federal Property Management Section
Office of Federal Agency Programs



Preserving America's Heritage

October 16, 2018

Ms. Audrey Entorf
Regional Historic Preservation Officer
U.S. General Services Administration
Southeast Sunbelt Region 4 (4PED)
77 Forsyth Street, SW
Atlanta, GA 30303

Ref: *Proposed Design and Construction of a New U.S. Courthouse Annex
Savannah, Georgia (ACHPConnect Log Number: 11244)*

Dear Ms. Entorf:

On September 17, 2018, via electronic mail the Advisory Council on Historic Preservation (ACHP) was copied on a letter from the U.S. General Services Administration (GSA) to the Georgia State Historic Preservation Officer (SHPO), conveying the agency's finding of no adverse effect for the subject undertaking (Finding). The Finding was made in accordance with our regulations, *Protection of Historic Properties* (36 CFR Part 800), and conditioned upon GSA's execution of the undertaking substantively in accordance with a revised concept design (Design), as approved by the Savannah Historic District Review Board (HDBR) on September 12, 2017.

The Area of Potential Effects (APE) is limited to the area immediately surrounding the site of the undertaking, including the Tomochichi Federal Building and Courthouse (Courthouse), which is individually listed in the National Register of Historic Places, and a portion of one of the historic wards of the Savannah National Historic Landmark (NHL) District. Initially, GSA's undertaking included rehabilitation of the Courthouse and development of both adjacent lots and historic President Street. GSA determined that undertaking had the potential to adversely affect historic properties, invited ACHP to participate in consultation, and ACHP assented in a letter on December 22, 2017, anticipating development of a memorandum of agreement to resolve adverse effects.

However, GSA's extensive consultation effort, which included representatives from the Administrative Office of the U.S. Courts (Courts), the U.S. Marshals Service (Marshals), the U.S. Department of Interior National Park Service (NPS), ACHP, the SHPO, the City of Savannah, the Historic Savannah Foundation, the Savannah College of Art and Design, the National Trust for Historic Preservation, among others, and the public, resulted in significant modifications to the undertaking, as documented in the Design and Finding. Specifically, the Design and Finding evidence GSA modified the undertaking so that development of the new U.S. Courthouse Annex is limited to a single lot and does not include new parking facilities. GSA's willingness to consider alternatives to avoid adverse effects to historic properties was especially helpful, given GSA's selection of the design-build project delivery method for this undertaking.

ACHP commends GSA for taking seriously its stewardship responsibilities for such important historic

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401 F Street, N.W., Suite 308 • Washington, DC 20001-2637
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properties and carrying out the planning necessary to minimize harm to the NHL District to the maximum extent possible, in light of the pressing mission and security needs of the Courts and Marshals, respectively. NPS's formal condition assessment of the NHL District, which occurred in parallel, greatly contributed to GSA's consultation process, as did a high level of community involvement and public concern about historic properties. The Design marks a significant departure from GSA's initial undertaking, but also the undertaking as set out in the 1999 *Memorandum of Agreement, U.S. Courthouse Annex, Savannah, Georgia*, among GSA, SHPO, and ACHP (MOA), dramatically improving upon that considered almost two decades ago, and is of great benefit to historic properties.

With regard to other administrative matters, we understand GSA plans to promptly terminate the standing MOA in subsequent correspondence pursuant to its terms, which we look forward to receiving and acting upon prior to commencement of the undertaking. Also, as GSA's compliance with the National Environmental Policy Act (NEPA) and development of a Supplemental Environmental Assessment (EA) is occurring in coordination with the process dictated by 36 CFR Part 800, we expect the alternatives defined therein will be consistent with that which GSA described in the Finding, and look forward to receiving that information for our files.

Most importantly, we trust that GSA will implement the undertaking in accordance with the Finding in order to fulfill GSA's responsibilities under Section 106 of the National Historic Preservation Act and 36 CFR Part 800. In accordance with 36 CFR Part 800, if GSA decides not to carry out the undertaking as proposed in the Finding, GSA must reopen consultation.

We appreciate the opportunity to have taken part in GSA's consultation effort, and recognize GSA for continuing their leadership role in the federal preservation community. Should you have any questions, please contact Ms. Kirsten Kulis, ACHP's GSA Liaison (202-517-0217 or via e-mail at kkulis@achp.gov) and reference the ACHPConnect Log Number above.

Sincerely,



Tom McCulloch, Ph.D., R.P.A.
Assistant Director
Federal Property Management Section
Office of Federal Agency Programs

A.4 U.S. FISH AND WILDLIFE SERVICE (USFWS) – SOUTHEAST REGION

From: Ashish Desai - 4PME
To: [Melissa Secor](#); [Brian Whipple](#)
Cc: [Audrey Entorf](#); [Joseph Couch - 4PC1N](#); [Sam Harris - 4PCO](#); [Benjamin Lorber - LD4](#); [Swindale Rhodes \(4POA\)](#)
Subject: Fwd: [EXTERNAL] Notice of Public Scoping Meeting – Savannah Courthouse Annex Project
Date: Wednesday, May 30, 2018 9:37:03 AM

fyi.

----- Forwarded message -----

From: Imm, Donald <donald_imm@fws.gov>
Date: Tue, May 29, 2018 at 3:08 PM
Subject: Re: [EXTERNAL] Notice of Public Scoping Meeting – Savannah Courthouse Annex Project
To: ashish.desai@gsa.gov
Cc: Leopoldo Miranda <Leopoldo_Miranda@fws.gov>, Mike Oetker <michael_oetker@fws.gov>, Rob Tawes <Robert_Tawes@fws.gov>, Michelle Eversen <michelle_eversen@fws.gov>, Jack Arnold <Jack_Arnold@fws.gov>, Bill Wikoff <bill_wikoff@fws.gov>, John Doresky <John_Doresky@fws.gov>

Hi Ashish,

The Georgia Ecological Services office has reviewed the proposed project, we have no concerns relative to the Endangered Species Act, nor other NEPA/EIS related environmental regulations. We considered the proposed action, known locations of federally listed and at-risk species, as well as the site history which has been developed for well over 100 years. We have no additional comments at this time, please contact us if you need any additional information with this project, or any other proposed actions in Georgia. Thanks again, Don

On Thu, May 24, 2018 at 9:52 AM, Jack Arnold <jack_arnold@fws.gov> wrote:

Thanks Mike. I've cc'ed Don Imm and Rob Tawes here for their awareness and action as appropriate.

- Jack

Sent from my iPad

Begin forwarded message:

From: Michael Oetker <michael_oetker@fws.gov>
Date: May 23, 2018 at 11:17:04 AM EDT
To: jack_arnold@fws.gov
Cc: Leopoldo Miranda <leopoldo_miranda@fws.gov>
Subject: Fwd: [EXTERNAL] Notice of Public Scoping Meeting – Savannah Courthouse Annex Project

ES has lead if appropriate.

Mike

A.5 GEORGIA DEPARTMENT OF NATURAL RESOURCES, HISTORIC PRESERVATION DIVISION



MARK WILLIAMS
COMMISSIONER

DR. DAVID CRASS
DIVISION DIRECTOR

June 1, 2018

Audrey Entorf
Regional Historic Preservation and Fine Arts Officer
General Services Administration
Sam Nunn Federal Center
77 Forsyth Street SW
Atlanta, Georgia 30303

**RE: Savannah Tomochichi Federal Courthouse Annex
Chatham County, Georgia
HP-940729-002**

Dear Ms. Entorf:

The Historic Preservation Division (HPD) has reviewed the information submitted concerning the above referenced project. Our comments are offered to assist the General Services Administration (GSA) in complying with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA).

The subject project initially consisted of rehabilitation of the Tomochichi Federal Building and U.S. Courthouse, including building system upgrades, energy efficiency improvements, and restoration of terra cotta architectural elements, along with construction of a new courthouse annex. The project was previously submitted in 1994 and determined to have an adverse effect on the National Register of Historic Places (NRHP)-listed Savannah National Landmark District, due to the courthouse annex covering the entire block bounded by Whitaker, Barnard, York, and State Streets and enclosing President Street (North and South Trust Lots west of Tomochichi Federal Building & U.S. Courthouse). A Memorandum of Agreement (MOA) was executed in 1999 in order to resolve the adverse effects. Due to the absence of appropriated funding, the initially proposed project (design completed in 1999) was never implemented. Subsequently, consultation was reinitiated in January 2017 for a redesigned project meeting current and foreseeable Tomochichi Federal Building and U.S. Courthouse program requirements.

The current submitted information consists of conceptual plans for Tomochichi U.S. Courthouse Annex, which proposes demolition of the non-historic Juliette Gordon Lowe – Building A and Building B (b.1984) located on trust lots on the east side of Telfair Square. The current conceptual plans propose a new 3-story building on the south trust lot, replacing Juliette Gordon Lowe – Building B, closing off (fence and gate) West President Street between Whitaker and Barnard Streets, and replacing Juliette Gordon Lowe – Building A with secured (fenced) surface parking.

Based on the conceptual plans provided, it is HPD's opinion that the subject project, as proposed, will have **no adverse effect** to historic properties within its area of potential effects (APE), as defined in 36 CFR Part 800.5(b), and will meet the Secretary of the Interior's *Standards for the Treatment of Historic Properties*, provided the following conditions are met:

1. The parking lot enclosure for the North Trust Lot should provide a visual representation of a building. In this context, corner structures (walls) should approach the scale of at least a 1-story building with intermediate space filled with materials inferring storefronts. HPD should be given the opportunity to review and comment on associated parking lot enclosure plan revisions, as they become available, prior to proceeding with the work to ensure no change in the effects assessment and consistency with the Secretary's *Standards*.

JEWETT CENTER FOR HISTORIC PRESERVATION
2610 GA HWY 155, SW | STOCKBRIDGE, GA 30281
770.389.7844 | FAX 770.389.7878 | WWW.GEORGIAHPO.ORG

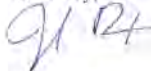
Ms. Entorf
June 1, 2018
HP-940729-002
Page 2

2. West President Street between Whitaker and Barnard Streets should remain visually open. In this context, existing pavement and curbing should be retained to the maximum extent feasible and gates/fencing crossing the street should be un-opaque. HPD should be given the opportunity to review and comment on associated street plan revisions, as they become available, prior to proceeding with the work to ensure no change in the effects assessment and consistency with the Secretary's *Standards*.
3. HPD should be given the opportunity to review and comment on the preliminary construction plans and documents, 75% complete construction plans, and any significant changes to the 90% complete construction plans, as they become available, prior to proceeding with the work to ensure no change in the effects assessment and compliance with the Secretary's *Standards*.

Please note that satisfying the conditions above does not preclude the project from constituting an adverse effect, as defined in 36 CFR Part 800.5(a)(2), once project plans are developed. Should an adverse effect be determined, HPD will work with GSA to complete the required steps in order to move the project forward.

Please refer to project number **HP-940729-002** in any future correspondence on this project. If we may be of further assistance, please do not hesitate to contact me at (770) 389-7851 or jennifer.dixon@dnr.ga.gov.

Sincerely,



Jennifer Dixon, MHP, LEED Green Associate
Program Manager
Environmental Review & Preservation Planning

cc: Lupita McClenning, Coastal Georgia Regional Commission
Beth Byrd, NPS
Kirsten Kulis, ACHP



September 17, 2018

Jennifer Dixon, Program Manager
Environmental Review & Preservation Planning
DNR Historic Preservation Division
Jewett Center for Historic Preservation
2610 Georgia Highway 155, SW
Stockbridge, GA 30281

RE: New U.S. Courthouse Annex
124 Barnard Street, Savannah, Georgia

Dear: Ms. Dixon,

The project background, identification of historic and non-historic properties, and area of potential effect outlined in my January 10, 2017 letter remain unchanged. However, following the public meeting held June 6, 2018, the U.S. General Services Administration (GSA) decided to eliminate the surface parking on the north Trust Lot for this Undertaking.

The concept is a single three-story building on the south Trust Lot that complements the unique character of the Savannah Historic District and is architecturally compatible with its context. The architecture of the annex, facing onto Telfair Square reflects its prominent location in this traditional setting and is sensitive to Savannah's Oglethorpe Plan.

Last week, on Wednesday, September 12, GSA was a petitioner before the Savannah Historic District Board of Review (HDBR) with the revised concept design. The Savannah HDBR approved the demolition of Juliette Gordon Low Building-B as well as the Certificate of Appropriateness (COA) for new construction at 124 Barnard Street Part 1: Height and Mass. A description of the concept prepared by the architect as well as design drawings and renderings were distributed with my September 4, 2018 letter.

The fourth consulting party meeting was also held last week, on Thursday, September 13, 2018. A copy of the meeting agenda, sign-in sheet and minutes is attached. The meeting minutes contain a summary of the HDBR meeting as well as two attachments. Attachment 1 is the staff report of the COA Part 1 for the subject property. Attachment 2 is written comments from Dr. Robin Williams concerning reuse of historic pavers.

While GSA plans to address comments received from staff regarding design details, we are moving forward with the concept design, as approved. We do not anticipate any substantive changes. As such, GSA finds that the proposed Undertaking avoids adverse effect to historic properties in accordance with 36 CFR 800.5. The approved concept design serves as the basis for GSA's finding of no adverse effect. Implementation of the Undertaking in accordance with the finding, as documented, fulfills GSA's responsibilities under Section 106.

Please feel free to contact me by telephone at 404.433.8490 (cell) or by email audrey.entorf@gsa.gov if you have any questions or need additional information.

Sincerely,



Audrey L. Entorf
Regional Historic Preservation and Fine Arts Officer

Enclosures

Cc: Consulting Parties



MARK WILLIAMS
COMMISSIONER

DR. DAVID CRASS
DIVISION DIRECTOR

October 1, 2018

Audrey Entorf
Regional Historic Preservation and Fine Arts Officer
General Services Administration
Sam Nunn Federal Center
77 Forsyth Street SW
Atlanta, Georgia 30303

**RE: Savannah Tomochichi Federal Courthouse Annex
Chatham County, Georgia
HP-940729-002**

Dear Ms. Entorf:

The Historic Preservation Division (HPD) has reviewed the additional information submitted concerning the above referenced project. Our comments are offered to assist the General Services Administration (GSA) in complying with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA).

The subject project initially consisted of rehabilitation of the Tomochichi Federal Building and U.S. Courthouse, including building system upgrades, energy efficiency improvements, and restoration of terra cotta architectural elements, along with construction of a new courthouse annex. The project was previously submitted in 1994 and determined to have an adverse effect on the National Register of Historic Places (NRHP)-listed Savannah National Landmark District, due to the courthouse annex covering the entire block bounded by Whitaker, Barnard, York, and State Streets and enclosing President Street (North and South Trust Lots west of Tomochichi Federal Building & U.S. Courthouse). A Memorandum of Agreement (MOA) was executed in 1999 in order to resolve the adverse effects. Due to the absence of appropriated funding, the initially proposed project (design completed in 1999) was never implemented.

Subsequently, consultation was reinitiated in January 2017 for a redesigned project meeting current and foreseeable Tomochichi Federal Building and U.S. Courthouse program requirements, which included the demolition of the non-historic Juliette Gordon Lowe – Building A and Building B (b.1984) located on trust lots on the east side of Telfair Square and the construction of a new 3-story building on the south trust lot, replacing Juliette Gordon Lowe – Building B, closing off (fence and gate) West President Street between Whitaker and Barnard Streets, and replacing Juliette Gordon Lowe – Building A with secured (fenced) surface parking. The redesigned project was previously determined by our office to have no adverse effect on the National Register of Historic Places (NRHP)-listed Savannah National Landmark District, with three (3) Conditions regarding the parking, street closure, and project plans.

The current submitted information includes revised conceptual plans for Tomochichi U.S. Courthouse Annex (dated September 12, 2018) submitted in response to Condition 3, which now propose demolition of the non-historic Juliette Gordon Lowe – Building B (b.1984) located on the south trust lot on the east side of Telfair Square, a new 3-story building on the south trust lot, replacing Building B, closing off (fence and gate) West President Street between Whitaker and Barnard Streets, and maintaining Juliette Gordon Lowe – Building A.

Based on the revised conceptual plans provided, it appears to HPD that Condition 1 is no longer applicable and that the project is progressing in accordance with Condition 3. Additionally, HPD concurs that the subject project, as proposed, will have **no adverse effect** to historic properties within its area of potential effects

JEWETT CENTER FOR HISTORIC PRESERVATION
2610 GA HWY 155, SW | STOCKBRIDGE, GA 30281
770.389.7844 | FAX 770.389.7878 | WWW.GEORGIAHPO.ORG

Ms. Entorf
October 1, 2018
HP-940729-002
Page 2

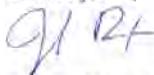
(APE), as defined in 36 CFR Part 800.5(b), and will meet the Secretary of the Interior's *Standards for the Treatment of Historic Properties*, provided the following revised condition is met:

2. West President Street between Whitaker and Barnard Streets should remain visually open. In this context, security enhancements and controlled vehicular access should be achieved without use of solid gates or fencing. HPD should be given the opportunity to review and comment on proposed plans for West President Street, as they become available, prior to proceeding with the work to ensure no change in the effects assessment and consistency with the Secretary's *Standards*.

HPD looks forward to continued consultation in accordance with Conditions 2 and 3 and working with GSA as this project progresses. Please note that satisfying the condition above, and those previously noted in our letter dated June 1, 2018, does not preclude the project from constituting an adverse effect, as defined in 36 CFR Part 800.5(a)(2), once project plans are developed. Should an adverse effect be determined, HPD will work with GSA to complete the required steps in order to move the project forward.

Please refer to project number **HP-940729-002** in any future correspondence on this project. If we may be of further assistance, please do not hesitate to contact me at (770) 389-7851 or jennifer.dixon@dnr.ga.gov.

Sincerely,



Jennifer Dixon, MHP, LEED Green Associate
Program Manager
Environmental Review & Preservation Planning

cc: Eric Landon, Coastal Georgia Regional Commission
Beth Byrd, NPS
Kirsten Kulis, ACHP

A.6 U.S. NATIONAL PARK SERVICE

IN REPLY REFER TO:
1.A.2

United States Department of the Interior

NATIONAL PARK SERVICE
Southeast Regional Office
Atlanta Federal Center
1924 Building
100 Alabama St., SW.
Atlanta, Georgia 30303



Ashish Desai
Regional Environmental Program Specialist
General Services Administration
Martin Luther King Federal Building
77 Forsyth Street
Atlanta, GA 30303

JUN 14 2018

Dear Mr. Desai:

Thank you for organizing the consulting parties meeting on May 8, 2018. We regret that we were unable to travel to Savannah for the meeting and we thank you for setting up a conference call line so that we could join by telephone. Following the meeting we received your email of May 23, 2018, which included meeting minutes and revised renderings. Our comments on these renderings are offered below.

GSA's proposed undertaking, construction of an Annex building and associated parking, is within the Savannah National Historic Landmark District, which the Secretary of the Interior designated in 1966. The Secretary has also designated several individual properties within Savannah as National Historic Landmarks. Within or adjacent to the Savannah National Historic Landmark district are six National Historic Landmarks. This concentration of nationally significant historic properties makes Savannah a particularly important place in illustrating American history.

Along with our National Parks, National Historic Landmarks are considered to be the most important historic properties in the United States. Upon designation by the Secretary of the Interior, National Historic Landmarks are automatically listed in the National Register of Historic Places and therefore included in the review of federal undertakings that are subject to Section 106 of the National Historic Preservation Act. Section 110(f) of the National Historic Preservation Act and the Section 106 regulations contain provisions that set a higher standard of consideration and care for National Historic Landmarks (54 U.S.C. 306107 and 36 CFR 800.10). Where National Historic Landmarks are concerned Section 110(f) provides that:

Prior to the approval of any Federal undertaking which may directly and adversely affect any National Historic Landmark, the head of the responsible agency shall, to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to such landmark, and shall afford the Advisory Council on Historic Preservation a reasonable opportunity to comment on the undertaking.

The National Park Service oversees the National Historic Landmarks Program and is committed to preserving the integrity of National Historic Landmarks. The National Park Service's 1999 *National Register Bulletin: How to Prepare National Historic Landmark Nominations*, defines integrity as "the ability of an historic property to convey its historical associations or attributes." Whereas National Register properties must merely have good integrity; to achieve and retain their National Historic Landmark designation, historic properties must possess a **high** degree of integrity (*NHL Bulletin* page 36-37).

In evaluating the effects of undertakings on a district it is important to consider the effects to both individual resources and the district as a whole. A historic district derives its significance from the interrelationships among its constituent resources. The individual structures within a district combine to form an assemblage that provides a visual sense of the overall historic environment. When too many small changes occur within a historic district, the district may lose its ability to convey significance as a unified entity.

The primary significance of the Savannah National Historic Landmark district, as articulated in the district's National Historic Landmark and National Register documentation, is the distinctive Savannah Town Plan (or as commonly known, Oglethorpe Plan) and the many buildings of architectural merit that rest upon that plan. The Savannah Town Plan is characterized by a series of wards, each of which contain four elements: four groups of house lots (tything block), four trust blocks reserved for public uses, a central square, and an access right-of-way. In our view, changes to the defining elements of this plan diminish the historic district's ability to convey its historic significance.

Alterations to the Town Plan

The current renderings depict a guard/security booth that appears to project into the right-of-way of President Street. Additionally, in the renderings, the whole of President Street is blocked with bollards, car barricades, and a gate. The loss of access to President Street, an important element in the town plan, diminishes the integrity of the district. The use of a trust block as a parking lot is also of concern to National Park Service staff. In our view, gated parking is not consistent with the historic use of the trust lots, which are to be reserved for public uses. We are disappointed that underground parking is not a part of the current design. We believe underground parking would be the best way to avoid altering the Town Plan as it would negate the need for blocking President Street as well as the need for constructing a parking lot on a trust lot. We urge GSA to take into account future needs of the court and give consideration to a design that would allow for the possible addition of underground parking in the future.

We appreciate that the GSA has made an effort to take architectural cues for the new Annex from surrounding buildings, including the Tomochichi Courthouse. However, we caution against over stressing the connection between the Tomochichi Courthouse and the new Annex. The Tomochichi Courthouse faces Wright Square and the new Annex will face Telfair Square. The new Annex should be compatible with buildings within its own ward, i.e. those buildings around Telfair Square. The Tomochichi Courthouse is an aberration to the Savannah Town plan as it occupies two trust lots. In seeking to link the proposed Annex to the Tomochichi Courthouse there is a risk of melding three separate trust lots into a large complex, which should be avoided. Any building built on a trust lot should respect the Town Plan and stand as an individual building.

Building Design

We believe the Annex should be compatible with the surrounding buildings in Telfair Square. We agree with comments from Ellen Harris, which were circulated to the consulting parties on May 24, 2018. In her comments, Ms. Harris outlined a series of measures that could be taken to better integrate the design of the Annex with Savannah Architecture.

We would like to emphasize that our concerns about the design of the proposed Annex are part of a broader concern for the Savannah National Historic Landmark District. The National Park Service recently commissioned a study to examine the integrity of the entire National Historic Landmark District. As part of this effort the report's authors developed a GIS database of contributing and non-contributing resources, and made a study of each square. The assessment shows that Telfair Square has diminished integrity, largely due to federal projects. As we stressed earlier, National Historic Landmarks are held to a higher standard of integrity than National Register properties. We must be careful to guard against incremental changes that over time can lead to a severe loss of integrity. As stewards of the National Historic Landmark District, we urge you to consider this project within the context of the larger National Historic Landmark District.

We look forward to working with you as the process continues. Please direct correspondence to Cynthia Walton at the address shown in the letterhead, or by email to Cynthia_Walton@nps.gov. Ms. Walton can be reached by telephone at (404) 507-5792.

Sincerely,



Lance Hatten
Deputy Regional Director
National Park Service, Southeast Region

cc:

Jennifer Dixon, State Historic Preservation Office (via email)
Kirsten Kulis, Advisory Council on Historic Preservation (via email)
Melissa Memory, Superintendent Fort Pulaski NM (via email)
Ellen Harris, Metropolitan Planning Commission (via email)
Daniel G. Carey, Historic Savannah Foundation (via email)
Bill Durrence, Alderman, City of Savannah (via email)



IN REPLY REFER TO:
1.A.2

United States Department of the Interior

NATIONAL PARK SERVICE
Southeast Regional Office
Atlanta Federal Center
1924 Building
100 Alabama St., SW.
Atlanta, Georgia 30303



OCT 10 2018

Audrey L. Entorf
Regional Historic Preservation and Fine Arts Officer
General Services Administration
Martin Luther King Federal Building
77 Forsyth Street
Atlanta, Georgia 30303

Dear Ms. Entorf:

Thank you for organizing the September 13, 2018, consulting parties meeting regarding the General Services Administration's (GSA) U.S. Courthouse Annex project in Savannah, GA. Following the meeting the National Park Service (NPS) received your email, dated September 17, 2018, notifying the consulting parties of GSA's finding of no adverse effect and requesting comments within 30 days. NPS agrees with GSA's finding of no adverse effect.

NPS believes GSA's revised design addresses NPS' concerns outlined in our letter dated June 14, 2018. NPS understands that GSA's revised proposal entails only replacement of the building known as Juliet Gordon Low Building B; the building currently occupying the southeast Trust Lot of Telfair Square in Heathcote Ward. In the revised design GSA will retain Juliet Gordon Low Building A, the existing building on the northeast Trust Lot, and has eliminated plans to install a surface parking lot. Further, NPS understands that President Street will remain visually open and that plans for a guard/security booth projecting into the right-of-way along with bollards, car barricades, and a gate, across President Street have been eliminated. NPS believes that as a result of these changes the project will not diminish the integrity of the Savannah National Historic Landmark District. If the current proposed plans are substantially changed as the project progresses, NPS would expect consultation to resume.

NPS encourages GSA to continue to work with local officials to ensure that the final building design is consistent with the local historic district zoning ordinance. Additionally, NPS echoes the concerns of other consulting parties with regard to the treatment of historic pavement and curbing materials. As the plans for the project are refined NPS would expect that the GSA retains these historic materials to the greatest extent possible.

National Historic Landmarks are places with meaning to all Americans; the NPS is committed to ensuring that they are preserved for the benefit of future generations. As owners of property within the Savannah NHL District, GSA has an enormous role in the preservation of the NHL. NPS encourages GSA to undertake planning efforts to address anticipated future requirements at the

Juliette Gordon Low Federal Building Complex in a way that ensures the long-term preservation of the District.

It has been a pleasure to work with you throughout this consultation. If you have any questions about this letter please contact Cynthia Walton at Cynthia_Walton@nps.gov or by telephone at (404) 507-5792.

Sincerely,



Robert A. Vogel
Regional Director

cc:

Jennifer Dixon, State Historic Preservation Office (via email)
Kirsten Kulis, Advisory Council on Historic Preservation (via email)
Melissa Memory, Superintendent Fort Pulaski NM (via email)
Ellen Harris, Metropolitan Planning Commission (via email)
Daniel G. Carey, Historic Savannah Foundation (via email)
Bill Durrence, Alderman, City of Savannah (via email)
Hunter Hall, Office of Congressman Earl L. "Buddy" Carter, First District of Georgia (via email)

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APPENDIX B SCOPING

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APPENDIX B SCOPING

B.1 INTRODUCTION

During preparation of the Environmental Assessment (EA), the United States (U.S.) General Services Administration (GSA) conducted public scoping activities for the Savannah Courthouse Annex Supplemental Focused Environmental Assessment (EA). The public scoping period began on May 23, 2018 when GSA issued the scoping letter to the stakeholder list. Refer to Appendix A to view the scoping letter. In addition, GSA published announcements in the *Savannah Morning News* on the following dates: May 30, June 3, and June 4, 2018. As part of the notification, comments and suggestions were requested to be postmarked no later than June 26, 2018. A public scoping meeting was held on June 6, 2018, at the Metropolitan Planning Commission Office in Savannah and was attended by approximately 37 people.

Based on the 42 comments received during the scoping period, the following issues were the primary concerns regarding the project:

- Inconsistency with the Oglethorpe Plan;
- Potential impacts to the Savannah Historic Landmark District classification;
- Opposition of conversion of a trust lot into a surface parking lot;
- Recommendation of parking alternatives to the surface parking including underground parking and/or underground tunnels to existing underground parking;
- Opposition of obstruction of West President Street and maintaining as a closed street; and
- Recommendation that the design should be consistent with Telfair Square and surroundings.

Originally, GSA presented the following alternatives during the EA Scoping Period and at the Scoping Meeting.

- Alternative 1 – A three-story building at 124 Barnard Street with secure surface parking at 120 Barnard Street. (Preferred Alternative)
- Alternative 2 – A three-story building with underground parking at 124 Barnard Street with the existing Juliette Gordon Low (JGL) Building A at 120 Barnard Street retained.
- Alternative 3 – A three-story building with underground parking at 124 Barnard Street and park-like setting at 120 Barnard Street.
- Alternative 4 – A two-story building spanning over West President Street.
- No Action Alternative

GSA received feedback regarding the design from the public and agencies. A major concern expressed from the community is the importance of minimizing impacts to the Oglethorpe Plan and the Savannah Historic District. Specifically, many concerns were focused on the removal of JGL Building A and construction of a secured surface parking lot on a Trust Lot. To respond to public and agency feedback, GSA revised the alternatives to include the alternatives currently analyzed in this EA including the No Action Alternative and the Proposed Action (a three-story building at 124 Barnard Street and retention of JGL Building A at 120 Barnard Street).

This appendix provides copies of the scoping materials including the newspaper announcement, scoping meeting handout and posters, and a transcript of the scoping meeting prepared by a court reporter.

B.2 NEWSPAPER ADVERTISEMENT

AFFIDAVIT OF PUBLICATION
SAVANNAH MORNING NEWS

STATE OF GEORGIA,
COUNTY OF CHATHAM

Personally appeared before me, Alaina Fincher, to me known who being sworn, deposes and says: That he/she is the authorized agent of GateHouse Media, Georgia Holdings, Inc., d. b. a. Savannah Morning News in Chatham County, Georgia;

That he/she is authorized to make affidavits of publication on behalf of said company; That said newspaper is of general circulation in said county and in the area adjacent thereto; That said newspaper in the legal organ for publication in Chatham County, Georgia; That he/she has reviewed the regular editions of the Savannah Morning News, published:

May 30, 2018

June 3, 2018

June 4, 2018

_____, 2018

And finds that the following advertisement to wit:

appeared in each of said editions.

Sworn to and subscribed before me;

Alaina Fincher
(Deponent)

This 7 day of June, 2018

Eugene J Cronk
Notary Public; Chatham County, GA.

EUGENE J CRONK
Notary Public, Chatham County, Georgia
My Commission Expires January 24, 2022

PUBLIC SCOPING MEETING
Supplemental Focused
Environmental Assessment
for Savannah Courthouse Annex,
Savannah, Georgia

Pursuant to the requirements of the National Environmental Policy Act (NEPA), the General Services Administration (GSA) Southeast-Southwest Region announces its intent to prepare a Supplemental Focused Environmental Assessment (EA) to identify and address potential environmental impacts associated with the proposed Savannah Courthouse Annex Project, located in Savannah, Georgia.

GSA will analyze a range of alternatives including the no action alternative for the proposed annex. As part of the EA, GSA will study the impacts of each alternative on the natural, cultural, and social environment. GSA will be consulting under Section 106 of the National Historic Preservation Act, 16 United States Code (USC) 4701 and intends to partially fulfill the Section 106 public notification and consultation requirements through the NEPA scoping process.

In 1996, GSA completed an Environmental Impact Statement (EIS) for the U.S. Courthouse Annex, Savannah, Georgia to address potential impacts associated with the construction and operation of a courthouse annex to the existing Tomochichi Federal Building and U.S. Courthouse at one of three sites. At the conclusion of the EIS, GSA selected a site, but did not receive construction funds until fiscal year 2016. Upon receiving the authorization and appropriation in 2016, GSA re-initiated the design process.

GSA is pursuing a revised design for the proposed courthouse annex to address the current needs of the Federal Courts and respond to the public and consulting parties' feedback received during the development of the conceptual design for the project. The selected site is currently occupied by Buildings A and B of the Juliette Gordon Low Federal Building Complex and is already owned by the government. Under the Proposed Action, the GSA would construct an annex at 124 Barnard Street, Savannah, Georgia. The new courthouse annex would be approximately 35,000 gross square feet in size and include an approximately 11,000 gross square foot secured parking lot at 120 Barnard Street.

A Public Scoping Meeting will be held on Wednesday June 6, 2018 at the Metropolitan Planning Commission (Arthur Mendonsa Hearing Room), 112 East State Street, Savannah, GA. The meeting will be from 5:30 PM to 8:00 PM. GSA will provide a brief presentation about the project at 6:00 PM and will seek input and answer questions from the public at this meeting.

Interested parties should identify issues and provide comments within their statutory responsibilities that should be considered in the EA on or before Tuesday June 26, 2018, preferably

via email to Ashish Desai at ashish.desai@gsa.gov. The comments can also be sent via mail, postmarked by June 26, 2018, to the attention of:

Mr. Ashish Desai
Regional Environmental
Program Specialist
General Services Administration
Martin Luther King
Federal Building
77 Forsyth Street,
Atlanta, GA 30303

B.3 SCOPING MEETING HANDOUT



Public Scoping Meeting | June 6, 2018

Savannah Courthouse Annex Project Supplemental Focused Environmental Assessment

INTRODUCTION AND BACKGROUND

The General Services Administration (GSA) Southeast Sunbelt Region announces its intent to prepare a Supplemental Focused Environmental Assessment (EA) to identify and address potential environmental impacts associated with the proposed Savannah Courthouse Annex Project, located in Savannah, Georgia. GSA will analyze a range of alternatives including the no action alternative for the proposed annex. As part of the EA, GSA will study the impacts of each alternative on the natural, cultural, and social environment. GSA will be consulting under Section 106 of the National Historic Preservation Act, 16 United States Code (USC) 470f and intends to partially fulfill the Section 106 public notification and consultation requirements through the NEPA scoping process.

In 1996, GSA completed an Environmental Impact Statement (EIS) for the *U.S. Courthouse Annex, Savannah, Georgia* to address potential impacts associated with the construction and operation of a courthouse annex to the existing Tomochichi Federal Building and U.S. Courthouse at one of three sites. At the conclusion of the EIS, GSA selected a site, but did not receive construction funds until fiscal year 2016. Upon receiving the authorization and appropriation in 2016, GSA re-initiated the design process.

PROJECT DESCRIPTION

GSA is pursuing a revised design for the proposed courthouse annex to address the current needs of the Federal Courts and respond to the public and agency feedback received during the development of the conceptual design for the project. The selected site is currently occupied by Buildings A and B of the Juliette Gordon Low Federal Building Complex and is already owned by the government. Under the Proposed Action, the GSA would construct an annex at 124 Barnard Street, Savannah, Georgia. The new courthouse annex would be approximately 35,000 gross square feet in size and include an approximately 11,000 gross square foot secured parking lot at 120 Barnard Street. Refer to the conceptual design figure on page 1 and the site location map on page 2 of this handout.



PUBLIC SCOPING

Scoping is an early and open mechanism for developing the range of issues to be addressed in the EA and Section 106 process. It allows the public to help define, prioritize, and convey stakeholder and community issues to the agency through oral and written comments. A critical element of the scoping process is the public meeting during which comments and concerns are officially documented.

GSA will host a public scoping meeting. The following information details the public scoping meeting agenda:

Where: Metropolitan Planning Commission
(Arthur Mendonsa Hearing Room),
112 East State Street, Savannah, GA

When: Wednesday June 6, 2018 from 5:30 – 8:00 PM
Informational Session: 5:30 – 6:00 PM
GSA Presentation: 6:00 – 6:30 PM
Public Comments/Questions: 6:30 – 8:00 PM

Interested parties should identify issues and provide comments within their statutory responsibilities that should be considered in the EA on or before Tuesday, June 26, 2018, preferably via email to Ashish Desai at ashish.desai@gsa.gov. The comments can also be sent via mail, postmarked by June 26, 2018, using the address information below.

PUBLIC COMMENTS

Mr. Ashish Desai
Regional Environmental Program Specialist
General Services Administration
77 Forsyth Street
Atlanta, GA 30303
ashish.desai@gsa.gov



Public Scoping Meeting | June 6, 2018

Savannah Courthouse Annex Project Supplemental Focused Environmental Assessment



NATIONAL ENVIRONMENTAL POLICY ACT

The National Environmental Policy Act of 1969, commonly referred to as NEPA, is the nation’s legislative charter for protection of the environment. NEPA provides for the consideration of environmental issues in federal agency planning and decision-making. NEPA requires federal agencies to prepare an Environmental Assessment (EA) to make a determination whether the action may significantly affect the quality of the human environment.

Potential topics to be studied in the EA include:

- Cultural Resources
 - Transportation and Parking
 - Air Quality
 - Biological Resources
 - Geology and Soils
 - Health and Safety
 - Infrastructure and Utilities
- Land Use and Aesthetics
 - Materials and Waste Management
 - Noise
 - Socioeconomics, Environmental Justice, and Community Services
 - Water Resources

NATIONAL HISTORIC PRESERVATION ACT – SECTION 106

Section 106 of the National Historic Preservation Act (NHPA) of 1966 requires that federal agencies take into account the effects of their actions on any district, site, building, structure, or object listed in, or eligible for inclusion in, the National Register of Historic Places. GSA has initiated consultation under Section 106 of the National Historic Preservation Act 54 USC §306108 and intends to partially fulfill the Section 106 public notification and consultation requirements through the NEPA scoping process.

TIMELINE



B.4 SCOPING MEETING POSTERS

GSA

National Environmental Policy Act

The National Environmental Policy Act of 1969, commonly referred to as NEPA, is the nation’s legislative charter for protection of the environment. NEPA provides for the consideration of environmental issues in federal agency planning and decision-making. NEPA requires federal agencies to prepare an Environmental Assessment (EA) to make a determination whether an action may significantly affect the quality of the human environment.

Potential topics to be studied in the EA include:

- Cultural Resources
- Land Use and Aesthetics
- Transportation and Parking
- Materials and Waste Management
- Air Quality
- Noise
- Biological Resources
- Socioeconomics, Environmental Justice, and Community Services
- Geology and Soils
- Water Resources
- Health and Safety
- Infrastructure and Utilities

National Historic Preservation Act – Section 106

Section 106 of the National Historic Preservation Act (NHPA) of 1966 requires that Federal agencies take into account the effects of their actions on any district, site, building, structure, or object listed in, or eligible for inclusion in, the National Register of Historic Places. GSA has initiated consultation under Section 106 of the NHPA 54 USC §306108 and intends to partially fulfill the Section 106 public notification and consultation requirements through the NEPA scoping process.

NEPA Timeline

```

graph LR
    A[Public Scoping] --> B[Environmental Analysis]
    B --> C[Draft EA]
    C --> D[Public Comment Period]
    D --> E[Final EA]
    E --> F[Finding of No Significant Impact]
    
```

We are here



Proposed Action

Proposed Action GSA's Proposed Action is to design and construct a courthouse annex at 124 Barnard Street, Savannah, Georgia. The new courthouse annex would be approximately 35,000 gross square feet in size and include an approximately 11,000 gross square foot secured parking lot at 120 Barnard Street. The selected site is currently occupied by Buildings A and B of the Juliette Gordon Low Federal Building Complex and is already owned by the government.

Alternatives Considered

- No Action Alternative
- Alternative 1 – A three-story building at 124 Barnard Street with secure parking at 120 Barnard Street. (Preferred)
- Alternative 2 – A three-story building with underground parking at 124 Barnard Street with the existing Juliette Gordon Low Building A at 120 Barnard Street retained.
- Alternative 3 – A three-story building with underground parking at 124 Barnard Street and a park like setting at 120 Barnard Street.
- Alternative 4 – A two-story building spanning over West President Street.





Project Background

Background In 1996 GSA conducted an Environmental Impact Statement (EIS) for the *U.S. Courthouse Annex, Savannah, Georgia* to address potential impacts associated with the construction and operation of a courthouse annex to the existing Federal Building Courthouse at one of three sites. At the conclusion of the EIS, GSA selected a site, but did not receive construction funds until fiscal year 2016. In the interim, some of the requirements for the project had changed, such that less space would be required. GSA is pursuing a revised design for the proposed courthouse annex to address the current needs of the Federal Courts and to respond to public and agency feedback received during the development of the conceptual design for the project.

Coordination

GSA extensively coordinates with federal, state, and local stakeholders including agencies, elected officials, and interested parties. Community and agency feedback have resulted in multiple redesign efforts to consider key design elements that are important to the community.

In an effort to address public and consulting party feedback received during conceptual design of the project, GSA is pursuing a revised design which will also address the current needs of the Federal Courts.



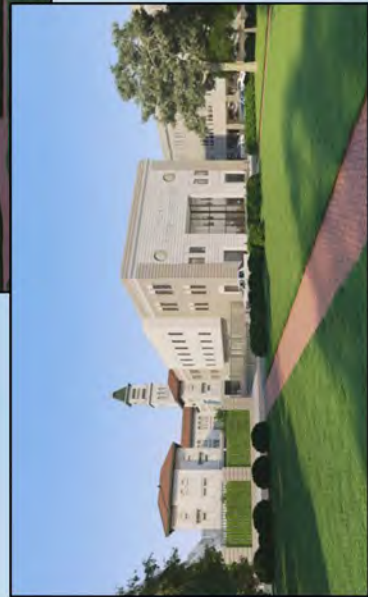
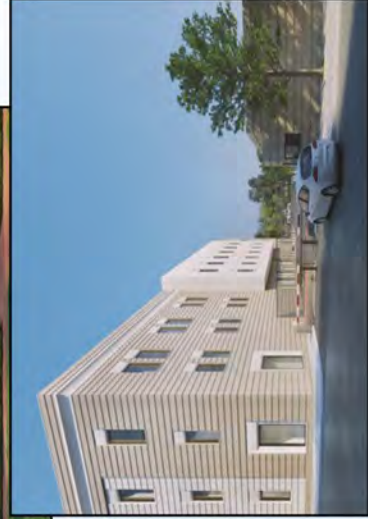
Project Timeline

- February 1996 – GSA completes the Final EIS and site selection
- 1996 – 1998 – GSA completes design of the courthouse annex
- 1999 – Construction not funded
- 2015 – Reprogrammed with reduced square footage and new housing study
- June 2016 – GSA obtains funding for annex
- October 2016 – GSA meets with MPC and city planners
- September 2017 – GSA awards design-build contract
- October 2017 – GSA initiates preliminary design
- November 2017 – Public meeting about preliminary design concept
- December 2017 – Architectural review board meeting
- January 2018 – Consulting party meeting
- February 2018 – GSA initiates revised design
- April 2018 – GSA initiates the NEPA process
- May 2018 – Consulting party meeting
- Summer 2018* – Publish Draft EA and begin public comment period
- Fall 2018* – Publish Final EA

Note: Dates listed are not inclusive. Future dates are estimated (denoted *).



GSA
**Savannah Courthouse Annex
GSA Preferred Design Alternative**



B.5 SCOPING MEETING TRANSCRIPTS

<p style="text-align: right;">Page 1</p> <p style="text-align: center;">IN THE METROPOLITAN PLANNING COMMISSION FOR THE STATE OF GEORGIA</p> <p>IN RE:)) PUBLIC SCOPING MEETING,)))</p> <p>Public Scoping Meeting Savannah Courthouse Annex Project Supplemental Focused Environmental Assessment reported by Elise M. Napier, CCR-2492, in the offices of Metropolitan Planning Commission, 110 State Street, Savannah, Georgia, on Wednesday, June 6, 2018, commencing at 6:03 p.m.</p> <p>Transcript Prepared By:</p> <p style="text-align: center;">McKEE COURT REPORTING, INC. P.O. Box 9092 Savannah, Georgia 31412-9092 (912) 691-4545</p>	<p style="text-align: right;">Page 3</p> <p style="text-align: center;">I N D E X</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Speakers</th> <th style="text-align: right;">Page</th> </tr> </thead> <tbody> <tr> <td>By Ms. Entorf</td> <td style="text-align: right;">4</td> </tr> <tr> <td>By Mr. Desai</td> <td style="text-align: right;">8</td> </tr> <tr> <td>By Mr. Couch</td> <td style="text-align: right;">13</td> </tr> <tr> <td>Certificate of Reporter</td> <td style="text-align: right;">48</td> </tr> <tr> <td>Reporter Disclosure</td> <td style="text-align: right;">49</td> </tr> </tbody> </table> <p>(Reporter's disclosure statement attached to back of transcript.)</p> <p style="text-align: center;">* * * * *</p> <p style="text-align: center;">E X H I B I T S</p> <p style="text-align: center;">(No Exhibits were marked.)</p>	Speakers	Page	By Ms. Entorf	4	By Mr. Desai	8	By Mr. Couch	13	Certificate of Reporter	48	Reporter Disclosure	49
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<p style="text-align: right;">Page 3</p> <p style="text-align: center;">A P P E A R A N C E S</p> <p>GENERAL SERVICES ADMINISTRATION:</p> <p>AUDREY ENTORF, Regional Historic Preservation Officer</p> <p>ASHISH DESAL, Regional Environmental Program Specialist</p> <p>JOSEPH COUCH, Project Manager</p> <p>SAM HARRIS, Architect</p> <p>MELISSA SECOR, Environmental Scientist POTOMAC-HUDSON ENGINEERING, INC. 9801 Washingtonian Boulevard Suite 350 Gaithersburg, Maryland 20878 (301) 907-9078 X3048 melissa.secor@phe.com</p> <p>BRIAN WHIPPLE, Environmental Consultant with Potomac-Hudson Engineering, Inc.</p>	<p style="text-align: right;">Page 4</p> <p>MS. ENTORF: Hi. I'd like to get started. Good evening, ladies and gentlemen. My name is Audrey Entorf and I'm the regional SORT preservation officer with the United States General Services Administration. I'd like to, first of all, thank you to the staff of Metropolitan Planning Commission for providing this facility for our meeting tonight and thank you for attending.</p> <p>This public meeting is to pen your comments on the proposed U.S. courthouse annex project in Savannah. GSA will be the one that will design, construct and operate the annex so I'd like to tell you a little bit about the GSA. President Harry S. Truman created GSA in 1949 to provide centralized procurement of products, services and facilities the federal agencies need to serve the public.</p> <p>The clients of GSA include most civilian agencies of the executive branch, some military agencies and the judicial branch. Today GSA owns and leases over 376.9 million square feet of space and 9,600 buildings in more 2,200 communities nationwide. GSA manages a real estate portfolio of government owned and leased buildings providing</p>												

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<p style="text-align: right;">Page 5</p> <p>1 floor space to one million federal civilian 2 workers. 3 Over half of the government owned 4 buildings are 50 years old or older and more than 5 480 are listed or eligible for listing on the 6 national register of historic places. In addition 7 to existing owned and leased buildings GSA also 8 constructs new government buildings including the 9 U.S. courthouse. 10 We have several members of the GSA 11 project team here with me. I'll introduce them 12 and they can identify themselves: Joseph Couch, 13 the project manager; Ashish Desai, regional 14 Environmental program specialist; Sam Harris, 15 architect. 16 In addition to the GSA staff also in 17 attendance are Melissa Secor and Brian Whipple 18 with Potomac-Hudson Engineering, Inc., the 19 environmental consultants preparing the focused 20 supplemental environmental assessment, and they 21 are at the table with the handout where y'all 22 signed in and y'all may have already met them. 23 If you were able to arrive earlier 24 tonight, I hope you were able to pick up handouts, 25 ask questions and sign up to speak and view the</p>	<p style="text-align: right;">Page 7</p> <p>1 regional environmental program specialist, on or 2 before June 26th. His contact information was 3 provided on the scoping letters distributed May 4 23rd, it's on the slide and it's also included in 5 the project handout in the comment sheets. 6 The courts expansion needs were 7 identified in 1991 and a new courthouse was 8 proposed at that time. In 1996 GSA went through 9 and completed an environmental impact statement 10 for a courthouse annex in Savannah. We identified 11 a site and addressed potential impacts associated 12 with the construction of the annex and its 13 operation. 14 At the conclusion of the environmental 15 impact statement GSA selected a site and completed 16 the design but did not receive construction funds 17 until just this past few years in 2016. In the 18 interim some of the requirements for the court 19 changed such that less space is needed. The 20 selected site is currently occupied by the 21 Juliette Gordon Low building complex buildings A 22 and B and is owned by the government. 23 At this point I'm going to turn the 24 presentation over to Ash to talk about the 25 Environmental Policy Act in the process and topics</p>
<p style="text-align: right;">Page 6</p> <p>1 posters illustrating the project. GSA staff, as 2 I'm doing now, will make a short presentation 3 about the project and then will be followed by an 4 open session for us to listen to your comments. 5 After the speakers are finished GSA staff will be 6 around to answer questions. 7 Scoping is an early and open mechanism 8 for developing a range of issues we addressed in 9 the environmental assessment section 106 process. 10 it allows the public to help define, prioritize 11 and convey stakeholders and community issues to 12 the agency through both oral and written comments. 13 A critical element of the scoping process is the 14 public meeting during which comments and concerns 15 are officially documented. 16 We are excited to provide information 17 about the courthouse annex project and we're also 18 excited to offer an opportunity for public input. 19 Your comments will help us understand your 20 concerns: you can complete comment forms, sign up 21 to speak tonight, write an e-mail or written 22 comments. All of the comments that are received 23 tonight will be addressed in the draft 24 environmental assessment. 25 Comments should be sent to Ashish Desai,</p>	<p style="text-align: right;">Page 8</p> <p>1 to be included. 2 MR. DESAI: Thank you, Audrey. Good 3 evening, everyone. My name is Ashish Desai, I'm 4 the regional environmental program specialist in 5 the region four in Atlanta. We cover the 6 southeast region in eight states. We cover the 7 federal buildings and courthouses in eight states 8 in the Southeast portion of the country, so one of 9 my sponsors include the National Environmental 10 Policy Act in addition so it's called NEPA, so 11 it's region four. 12 So let me first begin with what is NEPA? 13 NEPA is actually a planning and zoning process 14 where we as the specialists we have to consider 15 the impacts associated with the proposed action, 16 so before the proposed action we have to look at, 17 we had to give a hard look at what the impacts 18 with the proposed actions that the federal 19 agencies are proposing. 20 So that's the reason why we had to have 21 the NEPA process and we have to analysis those 22 impacts and if there is something that affects the 23 immediate with impacts associated with the 24 proposed action. So right now we are at the 25 public scoping stage so we are trying to collect</p>

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<p style="text-align: right;">Page 9</p> <p>1 the input from the public what are the concerns 2 and things like that. So we'll look at the 3 impacts, analyzing impacts and we'll do the, you 4 know, human call drafts and other assessment 5 documents. So that's what we will develop and 6 that will be published for the public comment 7 period and then it will finalize that. 8 That's the NEPA process right now. So 9 what kind of impacts normally we include. We 10 include impacts associated with the culture 11 resources, what is the impact on the customer 12 resource and site properties, what is the impact 13 on transportation and parking, what is the impact 14 on water resources, what the is the impact on 15 wetlands or flatlands, so those types of things 16 that we include in the assessment and then we take 17 hold of other assessments. 18 But in this case since we have already 19 gone through the impact statement, which is also 20 part of the NEPA process back in 1996, so GSA had 21 the document called the nonimpact statement. At 22 that time prior to selecting the site we had 23 already looked at the site with other impacts, so 24 since we already reviewed and analyzed the site 25 with the impact back in 1996 so those impacts are</p>	<p style="text-align: right;">Page 11</p> <p>1 preservation officer for NEPA also considers the 2 of the place of the proposed action so we're going 3 to integrate the process into NEPA so this is the 4 same consideration of the NEPA and the Historic 5 Preservation Act so we'll talk about the 6 alternatives and also the Historic Preservation 7 Act. Thank you. 8 MS. ENTORF: Okay. If you got here 9 early, you looked at the posters and probably saw 10 the alternatives that are being considered. So, 11 first of all, is the no action alternative and 12 basically there is no action is taken. It's a 13 measure against which all other actions are 14 compared. 15 The first alternative, and this is GSA's 16 preferred alternative at the current time, is to 17 build a single three story structure approximately 18 35,000 gross square feet. It will be 19 approximately 45 feet in height plus eight feet 20 mechanical penthouse on site of the south trust 21 light. It would include 11,000 gross square feet 22 of parking on the north trust light. 23 The second alternate is to build a three 24 story structure with underground parking on the 25 south lot with the building on the north trust lot</p>
<p style="text-align: right;">Page 10</p> <p>1 referenced in the EA. So we did not need - we 2 had all the impact we have already done the impact 3 statement in the past for the specific sites, so 4 those referenced in the EA. 5 So the NEPA process also involves the 6 public. We had to make sure that we sent to the 7 public, and we had the address their concerns and 8 we had to document the concerns and then we had 9 input and then analyze those inputs into the 10 selection process, the EA assessment. So we are 11 doing the focus and other assessments right now so 12 that's the process that we had to follow. 13 So this is your participated provided 14 input to provide your concerns into the selection 15 process. So before he leave today please take a 16 handout and please, you know, if whatever comments 17 you have, you can either send to me by e-mail. My 18 name is already in the handout because that's 19 being send to me and GSA will look at the 20 response. 21 I think this is, so as part of the NEPA 22 process we have to look at the alternatives not 23 just the options there so we have to consider all 24 those alternatives that are part of the proposed 25 action. So Audrey, which is the historic</p>	<p style="text-align: right;">Page 12</p> <p>1 retained. In this case the structure would 2 probably be taller perhaps 59 feet with the eight 3 feet mechanical equipment and it would be 46,000 4 gross square feet. 5 The third alternative is similar but it 6 would not retain the building on the north trust 7 lot instead would have a park after it was 8 demolished. The fourth option is a two story 9 structure farming over with President Street 38 10 feet in height with an eight feet mechanical 11 penthouse, 46,000 gross square feet. This is the 12 option that was initially presented to GSA and was 13 presented to the public and probably will not be 14 pursued but will be considered in the 15 environmental assessment. 16 Section 106 of the National Historic 17 Preservation Act requires that federal agencies 18 take into account the effects of their actions on 19 any district site, building structure or object 20 listed in or eligible for inclusion in the 21 national register for historic places. 22 GSA has initiated consultation in 2017 23 and intends to partially fulfill Section 106 24 public notification and consultation requirements 25 through the scoping process. We've helped three</p>

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<p style="text-align: right;">Page 13</p> <p>1 Section 106 meetings with consulting parties to 2 date. So this is the basic four steps in the 3 NEPA -- I'm sorry, the 106 process. GSA has 4 extensively coordinated with federal, state and 5 local stakeholders including agencies, elected 6 officials and interested parties. 7 Community feedback has had a direct 8 effect on the key design elements. They are 9 important to the community and they are pursuing a 10 revised design that addresses comments we've 11 received today. 12 It's already mentioned that we initiated 13 a consultation in 2017 so as far as the 14 identification of the historic property for this 15 project we initially did a cultural resource 16 assessment in 1976 that identified the project 17 area and the properties around it and the 18 information in the cultural resource assessment 19 remains valid today, as the design progresses 20 we'll be doing the assessment of effects. 21 Joe is going to talk about the project 22 timeline and provide some information about the 23 concepts that we considered thus far and where we 24 are with the project. 25 MR. COUCH: Good evening. Again, my</p>	<p style="text-align: right;">Page 15</p> <p>1 and are here today with the public scoping 2 meeting. 3 So with that said, I'll take you through 4 the evolution of the design that we've got. This 5 is a site plan from the '96 building. I'll call 6 that the '96 building that was designed by Robert 7 Stern. 165, almost 166,000 square feet of space 8 in comparison our current scope is to build a 9 building with 35,000 of gross square feet, so as 10 you can see, it's a much reduced scope. 11 In '96 there was a memorandum of 12 agreement signed by the city. The advisory 13 council for historic preservation and GSA for a 14 building that would encompass the entire site. As 15 you can see there on the site planning of the dome 16 courthouse all the way to the right and then the 17 new annex there shaded in blue in Telfair Square 18 there to the left. 19 There was parking below that building 20 and that's the site plan for the '96 building. As 21 I've mentioned, the program changed drastically, 22 35,000 gross square feet, 25 secured parking 23 spaces in that new building is currently 24 programmed to house the bankruptcy court, the 25 probation and the U.S. Marshal service.</p>
<p style="text-align: right;">Page 14</p> <p>1 name is Joe Couch, I'm the project manager for 2 this project for GSA and as you can see here this 3 is our project timeline so I'm going to take you 4 back in time a little bit before we go forward. 5 In '96 we completed an environment impact study 6 for the original program that we had for the 7 courthouse and that courthouse was designed and 8 completed, designed for that courthouse was 9 completed in 1999. As Audrey mentioned, that 10 courthouse was not built, it was not funded at any 11 time and we sometime has passed and the program 12 changed due to security then reprogramming the -- 13 we came up with a revised housing study in 2015 14 and that housing study was submitted for funding 15 and in June of 2016 GSA received funding to build 16 a new courthouse annex with much reduced program. 17 In January of 2017 we began consultation 18 and with -- with consulting parties and have had 19 three of those meetings we have gone through. 20 Actually, that was in December is when we began 21 that process. In January we began consultation 22 with the city and other historic preservation 23 entities to ensure we're on the right track in 24 developing our project, and today we find 25 ourselves beginning the NEPA process back in April</p>	<p style="text-align: right;">Page 16</p> <p>1 Our new concept for the concept that 2 was -- let me stick to the script on this. Here 3 it is. Through the absence of finding and 4 extensive changes in tenant, security and energy 5 requirements as well as codes and standards since 6 the design was originally completed in '99, the 7 project now requires a complete design. 8 As was the previously planned courthouse 9 as the previously planned courthouse the new 10 courthouse annex would be located on GSA owned 11 property adjacent to the Tomochichi Courthouse. 12 The two GSA existing buildings the masses of the 13 buildings are broken down into improve their 14 scale. There is a marked step back on each side 15 of the volumes at the west face to gesture toward 16 the entrance of the center. 17 The step also serves to express the 18 extra height of the courtrooms and to improve 19 proportions of the dual facades of the facing 20 square. So, again, this is the site plan we'll 21 get to the renderings here in a minute, but you 22 can see that the building was to be built 23 primarily with two -- two masses or two volumes, 24 one on each of the trust blocks with the 25 connecting glass atrium in the middle.</p>

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<p style="text-align: right;">Page 17</p> <p>1 The revised design for the proposed 2 annex in Savannah Tomochichi Federal Courthouse 3 maintains the historic trust blocks of the 4 Oglethorpe plan and calls for a single, three 5 story structure with an adjacent secure surface 6 parking lot currently occupied by the Juliette A. 7 Gordon Low buildings A and B. 8 The trust lots are bound by West State, 9 West York, Whitaker and Barnard Street and 10 bisected by West President Street. The revised 11 proposal maintains West President Street with the 12 proposed building occupying the southern trust lot 13 and a secure landscaped parking located in the 14 north lot. 15 I'll point out some of the landscaping 16 includes existing trees on the lots so those like 17 colored green are the existing trees that we ought 18 to be able to maintain, which would be nice. With 19 the -- now, that design was further refined and 20 with the current design, this is where we are at 21 this point. West President Street has been opened 22 between Whitaker and Barnard by the elimination of 23 hedges, relocation of the guard booth to the north 24 trust lots and changing fencing across President 25 Street to gates.</p>	<p style="text-align: right;">Page 19</p> <p>1 express its masonry construction. Proportions of 2 all windows are vertical, which is sensible in 3 masonry construction to minimize lintel lengths. 4 The vertical to horizontal ratios never less than 5 five to three. 6 The public lobby for the building is a 7 generous open space that conveys a sense of 8 welcome and dignity. Its grand vertical dimension 9 draws visitors up to the courtroom and other 10 public functions on the second level as well as 11 creating an appropriate space for special events 12 and gatherings. 13 So that's all to say that this design 14 was initially conceived during the solicitation 15 process as the preferred design. It gave 16 reference or memory of West President Street where 17 you have two masses on the side on each trust 18 block with a glass atrium in the middle to, again, 19 give memory of West President Street. 20 Through public comment we evolved and 21 understood the importance of maintaining West 22 President Street and we arrived at the revised 23 concept, which says here the new building's 24 primary facade is defined by double height 25 recessed entry with civic lettering flanked by</p>
<p style="text-align: right;">Page 18</p> <p>1 So if you notice, it may be a small 2 thing to notice, but in this plan we had a guard 3 shack in the middle of President Street and hedges 4 on the Barnard side of West President Street there 5 were hedges that would block your view through 6 that area in the revised plan those hedges have 7 been removed and the guard shack was moved from 8 the center of the street to the north trust block. 9 Now, we'll get to the concept 10 renderings. So this is going back to the two 11 story masonry volumes that marked the original 12 trust blocks are made of grey face brick. The 13 proportions and rhythms of windows and other 14 openings are derived from an extensive study 15 proportions on the courthouse as well as the 16 Jepson Center and the Telfair Museum. 17 Coursing and proportions of the brick 18 pieces are inspired by the Tomochichi Courthouse 19 though there is also a broader reference in the 20 new masonry to the preponderance of square 21 proportions in the Oglethorpe plan. 22 The structural masonry walls that 23 satisfied the glass requirements of the project 24 quite economically also allow the brick to be 25 configured and detailed in an authentic way to</p>	<p style="text-align: right;">Page 20</p> <p>1 federal seats above. 2 The new building will front Telfair 3 Square. It is both differential to and inspired 4 by its distinguished historic neighbor. The new 5 building quietly interprets the architectural 6 language of Tomochichi Courthouse through scale 7 massing, design and materials. Ultimately, the 8 intent is to establish a clear relationship 9 between the old and the new buildings with the 10 design that is of its time but also complimentary 11 to its historic context. 12 Clad in the same buff brick that defines 13 the secondary facades of the Tomochichi Courthouse 14 the new annex will be a slender bar that will 15 raise just the corner of the historic structure 16 not exceeding it in height or volume. Details 17 will be executed in white Georgian marble and 18 stucco. 19 The contemporary clean lines reinterpret 20 the ornate ornamentation of the historic building 21 while still capturing the nobility of the late 22 19th century building consistent with typical 23 trust lots. 24 So that's a view from Barnard Street 25 looking at the front of the building and this is</p>

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<p style="text-align: right;">Page 21</p> <p>1 from Whitaker looking at the back of the building 2 and, again, you'll notice the large existing to 3 you that we hope to save in the secured parking 4 area behind masonry fence enclosed both with 5 masonry and metal fencing and a hedge for 6 screening and for aesthetics. 7 This is the front of the building from 8 Telfair Square. Some concept with hedges across 9 President Street for screening and this is, what, 10 York Street looking at the back of the building. 11 UNKNOWN MALE: If I can interrupt you 12 one moment. That your rendering did not seem to 13 be accurate with your plan. Can you go back one? 14 MR. COUCH: Well, this is not the -- 15 this is the second iteration, and I'll get to the 16 final one here in a second. This is what it was 17 prior to our final concept, so now we're here at 18 the final concept and we have the only change, 19 again, from the previous concept for rendering and 20 this rendering is the removal of the hedge on West 21 President Street and the guard shack, which is has 22 been moved from the center of West President to 23 the side, and that's a view. So you got the front 24 and now the back. 25 There will still be a fence for security</p>	<p style="text-align: right;">Page 23</p> <p>1 So just keep in mind that there are 2 cameras and microphones and an official transcript 3 is being recorded and will be made so, please 4 speak clearly and we will invite our first speaker 5 up to the podium, who is according to this list 6 Jerry Lominack. 7 MR. LOMINACK: That's close. I guess 8 they should be addressed to you rather be part of 9 the choir here. I'm Jerry Lominack. I'm an 10 architect here in Savannah. Actually, seems like 11 those bathroom buildings are looking a better than 12 they used to now. 13 Some of you know our firm, Lominack 14 Kolman Smith, in conjunction with Stone Mountain 15 based, New South Associates, recently completed an 16 analysis of the landmark historic district for 17 National Park Service and the change is both good 18 and bad recited in that report, which really 19 occurred -- covered that period from 1966 to 2016, 20 50 year period of the landmark historic district 21 has been in existence. 22 Some of the positive things cited in 23 that report were the passing of the Historic 24 Zoning Ordinance, the many buildings bought by 25 SCAD and given a new life, the demolition of the</p>
<p style="text-align: right;">Page 22</p> <p>1 but there is no -- you can see the guard shack is 2 kind of consumed into the mass of the structure, 3 which is there for housing some equipment, 4 mechanical equipment for the building. So that's 5 the final concept, which you have pictures of in 6 your handouts, and the preferred option for moving 7 forward with this project. And, like I say, the 8 updated environmental assessment has begun today, 9 the scoping meeting. 10 We have a 30 day public comment period 11 and in the fall of 2018 we hope to finalize the 12 environmental assessment, complete design in the 13 winter of 2018 and begin the construction early 14 2019 with construction completion in 2020. 15 So with that said, that's our 16 presentation. Looks like we ended pretty well on 17 time and so each -- we're going to ask for the 18 list of folks who would like to speak, each person 19 who would like to speak can come up. We're going 20 to call you up by name, you'll have five minutes 21 per speaker and if we get through all the speakers 22 and there is still some time left, we will request 23 that others can come up either a second time or 24 those they haven't marked their name will be given 25 an opportunity to speak as well.</p>	<p style="text-align: right;">Page 24</p> <p>1 parking garage on Ellis Square and putting the 2 square back in the public realm and the 3 preservation of and restoration of the many of the 4 districts who started buildings by homeowners and 5 various businesses. 6 Some of the negative things cited were 7 the loss of the many of the historic lanes of some 8 streets most by -- most of those by local and 9 federal government construction. And other things 10 were cited as threats to the district were 11 vacation rentals and large scale development, 12 which is mostly hotels in this case. 13 The comments that we received from the 14 public an overwhelming majority cited the loss of 15 the Oglethorpe plan and large scale development as 16 the number one and two greatest threats to the 17 district's integrity. Well, most of those 18 violations of the plan occurred in the Chatham 19 County Courthouse, the Tomochichi, The Juliette 20 Gordon Low Federal Building Complex and the 21 Savannah Civic Center, the Robinson garage just to 22 name a few and all of those are government 23 buildings. 24 Even today the city is building a new 25 cultural arts center that's taken one our historic</p>

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1 lanes and it will consider allowing the developer
 2 to remove another lane on the vacant property of
 3 Oglethorpe and Habersham across from the police
 4 station, and the all of the Planning Commission
 5 agreed with the recommendations of the MPC staff
 6 and is recommending to file a petition to rezone
 7 that property. As we've seen recently there is no
 8 assurance the city council would follow that
 9 recommendation.
 10 And now GSA wants to put a surface
 11 parking lot on as trust lot and remove yet another
 12 historic street from the public realm. That
 13 cannot be allowed to happen. The assessment I
 14 mentioned earlier reached the conclusion that the
 15 recommendation to park services landmark historic
 16 district's replacement a threatened category.
 17 Wouldn't it be ironic if another arm of
 18 federal government caused the district to lose its
 19 landmark status. I'm 78 years old so I'm probably
 20 not going to be around in 25 years. These
 21 buildings are being built, or this building I
 22 should say, but I really care what this city will
 23 be like in 25 years and that this world renowned
 24 town plan will still be virtually intact and the
 25 future generations of architects, city planners,

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1 the historians, yes, and even tourists can come
 2 here and be inspired by its uniqueness. I'm
 3 asking government please don't destroy that
 4 uniqueness.
 5 MR. COUCH: Thank you, we've got Ardis
 6 Wood. I would like to just point out I didn't
 7 mention that there is a little red or green,
 8 yellow light thing up there on the podium. If you
 9 notice that if you see a yellow light, that means
 10 you're right there on the podium. Yeah. I just
 11 wanted to mention that real quick.
 12 MS. WOOD: Ardis Wood. I'm glad to see
 13 that at least we can do down President Street now.
 14 that was a good choice to remove that glass box.
 15 There is a big missing tooth and someone said from
 16 the National Park Service, Oglethorpe didn't plan
 17 to have a parking lot on the trust lot and I think
 18 if we are so often pushed by the need or the
 19 desire for us all to have our own car, usually
 20 just one or two people backed in a car, and the
 21 automobile is threatening us continuously. I'm
 22 wondering, and I don't know how this works out,
 23 but my understanding is that for the lack of three
 24 parking spaces that couldn't figure out how to
 25 handle underground parking we have to look at the

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1 surface parking.
 2 It might a win-win it seems to me to
 3 have the government build and take rent in or sell
 4 this second lot to fill in that tooth and the
 5 second thing I want to know is is there any
 6 movement in our government to allow parking around
 7 government buildings? I mean, we're dealing with
 8 something that happened 20 years ago in terms of
 9 being fearful that a government building will be
 10 blown up.
 11 My understanding is that the terrorists
 12 these days are not going after government
 13 buildings maybe in part because we are protecting
 14 them inside but, you know, that they are bombing
 15 and taking other avenues. So would you be able to
 16 announce that or is there any effort to put
 17 parking around these buildings? Nobody knows?
 18 I think it would be a good question to
 19 ask. I mean, you know, it's one thing to protect
 20 ourselves but unnecessarily and kind of beyond
 21 when it's needed I think should be considered but
 22 don't let us do things we shouldn't to our
 23 beautiful plan just to accommodate cars. Thank
 24 you.
 25 MR. COUCH: Thank you. Next is Gary

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1 Radke.
 2 MR. RADKE: Correct.
 3 MR. COUCH: Sorry.
 4 MR. RADKE: Hello. I'm Gary Radke, I'm
 5 chairman of the Architectural Review Committee of
 6 the Historic Savannah Foundation and the
 7 University architectural historian. I'm cheered
 8 to see that the current plan calls for a building
 9 that is of substantial form that respects
 10 President Street.
 11 Like our previous speakers I'm very
 12 concerned about a surface parking lot and about
 13 the opening of the lack of full access for
 14 President Street. In the terms of this particular
 15 hearing I'm concerned about an environmental
 16 impact statement in that to tear down existing
 17 buildings is to, in fact, create an environmental
 18 impact and would urge that there be yet further
 19 and more serious study given to the reuse and
 20 adaptation of the existing building where it's now
 21 being proposed the ground surface level parking
 22 and I hardly endorse the ideas that have been
 23 repeatedly proposed that there be underground
 24 parking so as to connect to the other buildings
 25 and give security to this area. thank you.

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<p style="text-align: right;">Page 29</p> <p>1 MR. COUCH: Thank you. Andrea 2 Patterson.</p> <p>3 MS. PATTERSON: Hi everybody. I'm 4 Audrey Patterson, president of the Victorian 5 Neighborhood Association. Of course, I don't live 6 immediately here, I'm on right on the other side 7 of Gaston Street but I'm here to support the 8 Downtown Neighborhood Association totally.</p> <p>9 And also I followed this very closely 10 because I'm also a good friend of Scott Barnard 11 and all the work that he has put in and I've been 12 in touch with everything that's been worked in. 13 you know, the Oglethorpe plan should not be 14 touched.</p> <p>15 We all know about sins, right? If you 16 do have that parking and limit President Street, 17 you are committing a mortal sin because you are 18 getting rid of a big part of the Oglethorpe plan 19 which needs to be protected. I want you to think 20 about that. Please don't do that. Respect what's 21 been done because this is one of the best plans 22 ever. There has to be another way.</p> <p>23 Do consider the underground parking. 24 Make it work. You can make it work if you want to 25 stay there. And Ardis was right, see if you can</p>	<p style="text-align: right;">Page 31</p> <p>1 original four old wards that Oglethorpe laid out 2 in 1733 insofar as downtown Savannah is 3 collectively referred to as the Oglethorpe plan 4 within that site.</p> <p>5 If we think of Oglethorpe as a founding 6 father, any action that he took would have greater 7 significance and say the expansion of that plan 8 after his departure and the end of the trustee 9 period in 1752. So we're dealing with what 10 arguably could be part of the most precious part 11 of the plan, the original four wards, and 12 President Street and like others I applaud the 13 changes the GSA made to the current configuration 14 of the building itself but do not endorse the idea 15 of using the north trust lot as a parking lot nor 16 even respective closing of President Street even 17 if the corridor is visually open, it is 18 effectively closed.</p> <p>19 The one way to solve this would be, and 20 I'm on the committee, local committee working with 21 the GSA, a series of meetings including one this 22 morning and we've talked extensively about the 23 possibility of underground parking and that would 24 go under the building. I think it's option two, 25 alternative two on the proposed action list, and</p>
<p style="text-align: right;">Page 30</p> <p>1 do the parking another way if you need to. So 2 thank you.</p> <p>3 MR. COUCH: Robin Williams.</p> <p>4 MR. WILLIAMS: Good afternoon. I'm 5 Robin Williams and I chair the Architectural 6 History Department at Savannah College of Art and 7 Design, past member of the Historic District 8 Review Board and author of a scholarly guide book 9 to the city of Savannah so I tried to bring to the 10 podium here a perspective of one who studied 11 Savannah for over two decades and especially the 12 history of its plan, which is not only significant 13 within the United States but significant 14 internationally.</p> <p>15 It's one of the most renowned urban 16 plans in the world and, in fact, urban plans in 17 our next travel to Savannah to study it to 18 including over 1,600 architects and planners came 19 just over a week ago to the Congress of Urbanism 20 meeting here in Savannah setting a record 21 attendance for that congress.</p> <p>22 And there is a reason for that and 23 that's because Savannah is appreciated and 24 celebrated for this remarkable thing called the 25 Oglethorpe plan. This site includes part of the</p>	<p style="text-align: right;">Page 32</p> <p>1 what's not clear from alternative two and needs to 2 be considered is the possibility of the 3 underground that's not only under the building but 4 as it extends under President Street thereby 5 giving in one level of underground parking 6 sufficient secured parking for the marshals and 7 the other -- the probate officers and including 8 the judges.</p> <p>9 So currently the judges are in what's 10 not apparently in these renderings is that the 11 current plan includes two judges, parking spots 12 for judges actually inside the existing building, 13 access from President Street along with an 14 adjacent loading bay.</p> <p>15 In recognition of the significance of 16 President Street these features could be moved to 17 Whitaker Street with the access to the underground 18 should be considered from Whitaker, which would 19 allow those two judges spots be moved underground 20 and Whitaker should be rightly thought of as a 21 lane. It is related proportionately to the lane, 22 to the width of the lane and effectively in the 23 Oglethorpe plan is a service or utilitarian 24 street, so it is the back door of this site and 25 then from Whitaker any access to an underground</p>

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<p style="text-align: right;">Page 33</p> <p>1 garage should be located as well as any delivery 2 bay, loading bay, delivery facility and if traffic 3 engineering gives the GSA any pushback, this 4 should be brought to the public's attention and if 5 need be, addressed to city council where, I 6 believe Alderman Bill Durrance has been at our 7 meetings, I'm sure would advocate for location on 8 Whitaker.</p> <p>9 Another issue would be the status of the 10 current physical entity of President Street with 11 its historic paving block graded curves and that 12 should be preserved even -- no matter what happens 13 along with the historic street lines. The current 14 renderings appear to be narrow on President Street 15 and not recognizing those historic lines.</p> <p>16 And, finally, the design is currently 17 top heavy and frankly needs to be taller 18 maintaining three stories so as not to invoke the 19 four story -- I forgot what they are called.</p> <p>20 MR. HARRIS: Progressive collapse. 21 MR. WILLIAMS: Progressive collapse.</p> <p>22 Thank you. The progressive collapse standards but 23 make those three stories proudly occupying the 24 trust lot building. Make them taller, makes them 25 prouder, do us prouder in Savannah with a building</p>	<p style="text-align: right;">Page 35</p> <p>1 need and deserve, but, yet having the open gates, 2 being surrounded by taller buildings anyone who 3 really wished to do harm to these judges certainly 4 could still do it.</p> <p>5 And to provide true protection if that 6 is the real reason for the lot, it would seem that 7 the underground option would be the best if it was 8 all being done for their protection. I think that 9 there are avenues that are still yet unexplored or 10 fully tested by GSA as far as the practicality, 11 feasibility of putting the underground tunnels and 12 utilizing the adjacent underground parking and I 13 would really like to go see the GSA make as bold a 14 move to do something which, quote, they can't do, 15 as they have already here in redoing the site 16 plan.</p> <p>17 It seems like six to eight months ago 18 that was not possible to take the first 19 incarnation and do a single building and then 20 you've done that very well. I think that the same 21 can be done with the parking. I think there are 22 unexplored options here and I would like to see 23 alternative two implemented. Thank you.</p> <p>24 MR. COUCH: Thank you. Daniel Carey. 25 MR. CAREY: Thank you. Daniel Carey</p>
<p style="text-align: right;">Page 34</p> <p>1 that we can make postcards of and say look at this 2 great thing the GSA did for us. Thank you.</p> <p>3 MR. COUCH: Ryan Arvay.</p> <p>4 MR. ARVAY: Forgive me, there is two of 5 here from Historic Savannah Foundation, but, yes, 6 he's my boss so I was deferring to him if he 7 wanted to go first. I'm Ryan Arvay, I work here 8 with the Historic Savannah Foundation. I'm not 9 speaking for the organization tonight, Daniel will 10 be doing that and he's been heavily involved in a 11 lot of meetings that everyone has been holding.</p> <p>12 I also just wanted to give credit where 13 credit is due to GSA for the improvements to the 14 building and the site plan, again, the visual 15 lines through the open fence that at least 16 preserve visually President Street.</p> <p>17 Again, I think to echo what has already 18 been said, it's a bit demeaning to put a parking 19 lot on a trust lot but that's an argument more on 20 philosophical grounds and I know there is 21 practical concerns here so I'll try only to speak 22 to the practical concerns and if putting a surface 23 lot on the north trust lot and securing it with a 24 wall to under the guise of the providing 25 protection for the judges, which I understand they</p>	<p style="text-align: right;">Page 36</p> <p>1 representing the Historic Savannah Foundation. 2 Thank you, Ryan, and well said, and all the 3 speakers. I think my comments will primarily be 4 addressed to the audience less the GSA because 5 I've spent considerable time and months with GSA 6 and I sincerely appreciate what they have done in 7 terms of following faithfully the section 106 8 process but also listening and responding to the 9 comments.</p> <p>10 We are making a difference and we need 11 you to continue articulating what your concerns 12 are, what your interests are because it is 13 helping, it is working and it also means that they 14 are listening and responding so that is good. 15 That's what -- that's what this process is 16 intended to do.</p> <p>17 So everyone has said something really 18 valuable an important thus far and that's why, 19 pardon my delay in not being here but I had 20 another appointment. I really wanted to see a lot 21 of times with the audience and, you know, we've 22 had plenty of opportunities to speak and I wanted 23 you to know the Historic Savannah Foundation is on 24 this matter, you know, there is no question about 25 that.</p>

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<p style="text-align: right;">Page 37</p> <p>1 And for anybody that, any nonCatholic 2 that needs a lesson in what the difference between 3 a mortal sin and a venial sin, come see Andre or 4 me and we'll explain that to you. But I think 5 what I really wanted to just underscore is that -- 6 that we are in this and we have come a long way. 7 we have a long way to go but I'm a glass half full 8 kind of person and I think we are making headway. 9 We are exploring things. we are getting important 10 and significant support from our congressional 11 delegation and I will say hopefully not 12 compromising their position but I think from the 13 judges as well and they have a voice in this as do 14 all the security officials, the marshals and the 15 probation officers and GSA. 16 But I'm heartened to feel the support 17 that I think that we're getting from the judges, 18 which is not to paint them in a particular corner 19 at all, but what I'm saying is there are a variety 20 of groups that are of a like mind on this and 21 really pushing hard and GSA is trying to do the 22 best they can under their constraints and their 23 budget, so stay the course, see this through and 24 continue to articulate this as often as you can as 25 clearly as you can with anyone you can in a</p>	<p style="text-align: right;">Page 39</p> <p>1 what are you going to take the Old Federal 2 Courthouse down so we can have a view from the 3 Lutheran Church? Of course not. 4 What we could do, though, is take the 5 facade in front, move that glass portion entrance 6 all the way to the front of the buildings and we 7 can put an arch of triumph there and glass it in 8 and do the same thing on Whitaker Street on the 9 Whitaker Street side. But internally in that 10 position we'll have plenty of room for security 11 people to easily control who entered and exited 12 the building. 13 We don't have any parking around the 14 building for security purposes. That's wonderful. 15 Also just look here what this wonderful building 16 here has done to that square. Oh, aren't we all 17 very proud of how it looks and that's what seems 18 to me is going to happen, put a parking lot under 19 President Street for the security for the judges 20 or whomever, plus consider this: You're talking 21 about, well, there are needs. The GSA needs 22 perhaps are not as great as they were plans ten or 23 15 years ago. 24 The customs people are desperately 25 looking for space. They are having to go out</p>
<p style="text-align: right;">Page 38</p> <p>1 decisionmaking position because it is going to 2 make a difference. 3 We're certainly in for the long haul 4 but, again, we've come a long way. We have more 5 to go but ultimately I think we can get something 6 here that Robin Williams said, maybe postcard 7 worthy and something that enhances the national 8 historic landmark district isn't denigrated. 9 Thank you. 10 MR. COUCH: Tom James. 11 MR. JAMES: Thank you. My name is Tom 12 James and I represent myself, I guess. I've been 13 a resident of Savannah for 75 years. This looks 14 like another make work project. I can't believe 15 you're talking about tearing down two perfectly 16 good buildings. 17 Also to move that facade further to the 18 Telfair Square is perfect for security purposes 19 also for -- for getting people into the two 20 buildings, putting the elevators on the outside 21 down on the other end and, in fact, putting a five 22 story building up on Whitaker that abuts this. 23 Also they should be digging two tunnels 24 under Whitaker Street into the old courthouse. 25 All this talk about moving down President Street,</p>	<p style="text-align: right;">Page 40</p> <p>1 west. They're in 25,000 feet on Chatham Parkway 2 just to be -- to have someplace to go. The Corps 3 of Engineers, I don't know exactly what they are 4 up to these days but it seems to me if we go on to 5 offshore drilling or we go into Wim offshore, the 6 Corps of Engineers is going to be much more 7 responsible for what happens and they are going to 8 be more additional personnel so they are going to 9 need the space. 10 So it seems to me also the city of 11 Savannah now we have abandoned the Gamble 12 Building. It's for sale and we're paying \$700,000 13 a year to the newspaper office to put people out 14 the newspaper office at Chatham Parkway. Can you 15 believe that? And here we have some very smart 16 architects and engineers making work around here. 17 Leave the two buildings where they are, 18 put up an atrium between them and use it, put a 19 parking lot under President Street. Other than 20 that, I appreciate your time. Thank you. 21 MR. COUCH: Thank you. Christian and 22 last name beginning with S, Sotfaw. 23 MR. SOTFAW: Good afternoon. My name is 24 Christian Sotfaw. I'm an urban designer and an 25 architect and really just to echo some of what's</p>

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<p style="text-align: right;">Page 41</p> <p>1 been said already but, to -- to be very clear that 2 the Oglethorpe plan really is the key here. It is 3 our national treasure and surface parking is never 4 a good alternative and I think when we think about 5 the Oglethorpe plan, it's expressed in two 6 dimensions and it's expressed in three dimensions 7 and the solid relationships with the plan would 8 still and not built is really essential (to the 9 quality of the plan in three dimensions regardless 10 of the era of the building. 11 And in a case in point is one of our 12 other original squares, Ellis Square was just 13 recently restored over the last decade and surface 14 parking lots were returned to built form and it's 15 had an immeasurable impact on the quality of the 16 city, so and that was a 50 year process. In a way 17 we've just recovered from a 50 year hangover in 18 Ellis Square and would be really unfortunate to 19 make that that same mistake again. 20 If I understand, I know there has been a 21 lot of good work here to help evolve this concept 22 but you are looking at multiple alternatives and 23 from what I can see, alternative two is clearly 24 the superior option at this point and if I 25 understand it, you would be maintaining the</p>	<p style="text-align: right;">Page 43</p> <p>1 be where this project is right now, there is good 2 work has been done and there is more work to do 3 but thank you and I appreciate the opportunity to 4 comment. 5 MR. COUCH: All right. Thank you. That 6 concludes those that have signed up to speak. We 7 would like to invite anybody else. All right. 8 Would anybody else who would like to speak and 9 just get up and say your name, please? 10 MS. ALLEN: Good evening. My name is 11 Melinda Allen and I'm the president of the 12 Savannah Downtown Neighborhood Association. First 13 I'd like to love to thank the GSA for working with 14 us in this process. We've had quite a few 15 individuals that have been participating in 106 16 meetings on our behalf and I really appreciate 17 your willingness to work with the neighborhood on 18 this project. 19 We support option number two. We would 20 like to see the existing structure maintained on 21 the extra lot or maybe you can sell it to make 22 some income to go ahead and do an even better 23 building on lot number one. The underground 24 parking, you know, when I speak to judges, they 25 definitely feel that that is obviously the most</p>
<p style="text-align: right;">Page 42</p> <p>1 existing structure on the northern trust lot 2 I think that would be a very preferred 3 solution. It would keep the solid void built form 4 of Telfair Square and it would, in fact, keep 5 buildings of multiple eras in the city at the same 6 time. It's essential that we do keep West 7 President Street, open, truly open. I think that 8 is essential to the integrity of the plan so if we 9 could do that, that would be really super starting 10 point. 11 So just to summarize, alternative two 12 clearly seems to be the best direction to continue 13 working in. Although it would be good to 14 visualize the outcome because we saw 15 visualizations of alternative one. I think it 16 would be really instructive to do visualizations 17 of alternative two where we maintain the existing 18 building on the northern lot and look at the 19 addition of a new building on the southern trust 20 lot and then from there that really starts 21 conversation about what the new architecture 22 should be and that would be a really different 23 conversation about how that architecture meets the 24 street, meets the sky, quality of the details and 25 so forth. But the urban design, which appears to</p>	<p style="text-align: right;">Page 44</p> <p>1 secure parking that they could have. You can 2 certainly put a tunnel underneath York Street to 3 go over to the other underground parking and/or to 4 the courthouse across Whitaker. 5 It's paramount that we keep President 6 Street open. While I do understand that at one 7 place of that thoroughfare and you can't see all 8 the way through the courthouse next door, we are 9 desperately trying to reclaim the lanes that we 10 have lost over the last 50 years. It will 11 important moving forward whenever we have the 12 opportunity to reclaim a lane or a square that we 13 do so. 14 The Oglethorpe plan is undeniably one of 15 best city plans if not in the country, in the 16 world and it attracts wonderful residences and 17 businesses to come set up shop in Savannah. We 18 have a great community and in addition to that we 19 had over 14 million visitors last year alone. 20 The reason why they are coming here is 21 because of the uniqueness of our urban environment 22 and the historic built structures, the plan and 23 the people that live here, so please, please, take 24 that into consideration. That certainly is 25 definitely an environmental concern.</p>

<p style="text-align: right;">Page 49</p> <p>COURT REPORTER DISCLOSURE</p> <p>Pursuant to Article 10-B of the Rules and Regulations of the Board of Court Reporting of the Judicial Council of Georgia, I make the following disclosure:</p> <p>I am a Georgia Certified Court Reporter. I am here as an employee of McKee Court Reporting, Inc. I am not disqualified for a relationship of interest under the provisions of O.C.G.A. 9-11-28(e).</p> <p>McKee Court Reporting, Inc. was contacted by Potomac-Badson Engineering, Inc., to provide court reporting services for this deposition.</p> <p>McKee Court Reporting, Inc. will not be taking this deposition under any contract that was prohibited by O.C.G.A. 15-14-27(a) and (b).</p> <p>McKee Court Reporting, Inc. has no exclusive contract to provide reporting services with any party to the case, any counsel in the case or any reporter or reporting agency from whom a referral might have been made to cover the deposition.</p> <p>McKee Court Reporting, Inc. will charge its usual and customary rate to all parties in the case, and a financial discount will not be given to any party to this litigation except in circumstances as agreed on a case by case basis.</p> <p style="text-align: center;">ELISE M. NAPIER CCR-2492</p>	

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