

# **Draft Environmental Assessment for U.S. Department of Agriculture – Agriculture Research Service Tifton Campus Consolidation and Modernization Project**

**USDA-ARS Tifton Campus, Georgia**

**Prepared for:  
U. S. Department of Agriculture, Savannah District**

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**9/2/2022**

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## LIST OF ABBREVIATIONS

<b><u>Abbreviation</u></b>	<b><u>Term/Phrase/Name</u></b>
AADT	Average Annual Daily Trip
ACM	asbestos containing material
AO	administrative offices
ARS	Agricultural Research Center
asl	above sea level
APE	area of potential effects
AST	above ground storage tank
BMPs	best management practices
Burns & McDonnell	Burns & McDonnell Engineering Company, Inc.
CBD	Center for Biological Diversity
CEQ	Council on Environmental Quality
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
CGBRU	Crop Genetics and Breeding Research Unit
CO	Carbon Monoxide
CO <sub>2</sub>	Carbon Dioxide
CWA	Clean Water Act
dBA	decibel A scale
EA	Environmental Assessment
EIS	Environmental Impact Statement
EISA	Energy Independence and Security Act of 2007
EO	Executive Order
ESA	Endangered Species Act
ESA	Environmental Site Assessment (Phase I)
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map

<b><u>Abbreviation</u></b>	<b><u>Term/Phrase/Name</u></b>
FNSI	Finding of No Significant Impact
GA	Georgia
GADNR	Georgia Department of Natural Resources
GASF	Georgia Archaeological Site File
GDOT	Georgia Department of Transportation
GEPD	Georgia Environmental Protection Division
GHG	greenhouse gas
GIS	Geographic Information System
GNAHRGIS	Georgia's Natural, Archaeological, and Historic Resources
GSF	gross square feet
GSWCC	Georgia Soil and Water Conservation Commission
HUC	Hydrologic Unit Code
HVAC	heating, ventilation, and air conditioning
IPaC	Information, Planning, and Consultation System
L <sub>dn</sub>	day-night sound level
L <sub>eq</sub>	24-hour equivalent sound level
LOD	limits of disturbance
LSS	local support staff
LSY	LSY Architects and Planners
MLRA	Major Land Resource Area
MOA	Memorandum of Agreement
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NHD	National Hydrography Dataset
NHPA	National Historic Preservation Act
NOA	Notice of Availability
NOAA	National Oceanic and Atmospheric Administration
NO <sub>x</sub>	Nitrogen Oxides

<b><u>Abbreviation</u></b>	<b><u>Term/Phrase/Name</u></b>
NPDES	National Pollutant Discharge Elimination Systems
NPS	National Park Service
NRHP	National Register of Historic Places
NRCS	Natural Resources Conservation Service
NSA	noise sensitive area
NWI	National Wetlands Inventory
NWP	Nationwide Permit
OSHA	Occupational Safety and Health Administration
PAR	Permanent Archival Record
PCBs	Poly-Chlorinated Biphenyls
PM	particulate matter
PM <sub>2.5</sub>	particulate matter whose particles are less than or equal to 2.5 micrometers
PM <sub>10</sub>	particulate matter whose particles are less than or equal to 10 micrometers
POR	Program of Requirements
POV	Privately Owned Vehicle
PPE	Personal Protective Equipment
PSD	Prevention of Significant Deterioration
RCRA	Resource Conservation and Recovery Act
ROI	region of influence
SEWRU	Southeast Watershed Research Unit
SHPO	State Historic Preservation Office
Project Site	USDA-ARS Tifton Campus
SO <sub>2</sub>	sulfur dioxide
SOI	Secretary of the Interior
SR	State Road
SY	scientific year
THPO	Tribal Historic Preservation Office
tpy	tons per year

<b><u>Abbreviation</u></b>	<b><u>Term/Phrase/Name</u></b>
UGA	University of Georgia
USC	United States Code
USACE	U.S. Army Corps of Engineers
USDA	U.S. Department of Agriculture
USGS	U.S. Geological Survey
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
UST	Underground storage tank
WOTUS	Waters of the U.S.
VOC	volatile organic compound

## **1.0 INTRODUCTION**

### **1.1 Project Background**

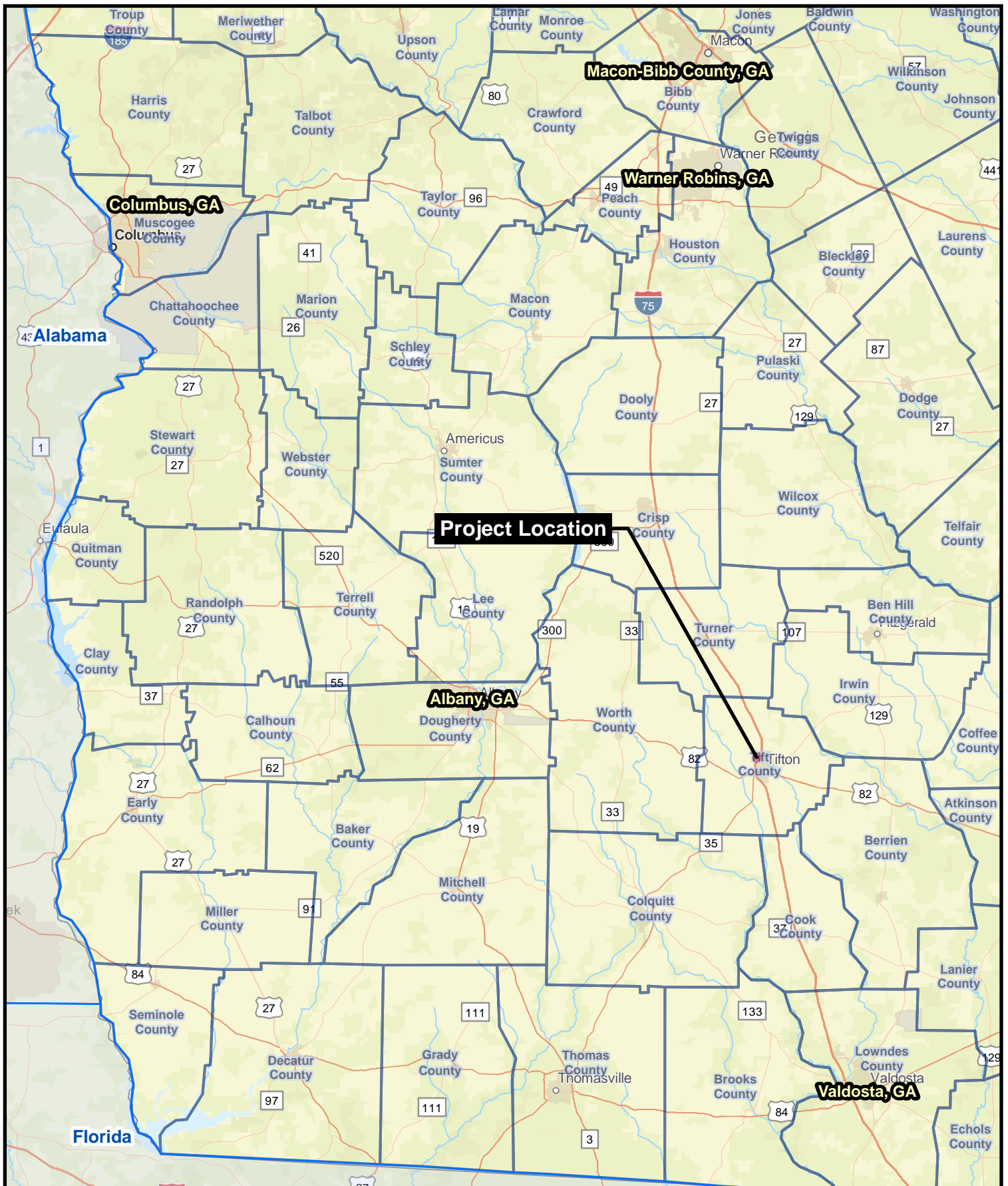
The U.S. Department of Agriculture's (USDA) Agriculture Research Service (ARS) Tifton Campus supports the Southeast Watershed Research Unit (SEWRU) and the Crop Genetics and Breeding Research Unit (CGBRU) research facilities. The SEWRU conducts research to understand the Southeast Coastal Plain watershed environment and identify sustainable and productive technologies to enhance agricultural practices while minimizing the use of chemicals. CGBRU conducts research to improve breeding methods and plant genetics for improved crop yields, enhance environmental quality, and pest management strategies. Research is conducted on warm season grasses (forage and turf), corn, peanuts, pearl millet, and sorghum. The USDA-ARS local support staff and administrative offices (LSS/AO) provides support to both the SEWRU and CGBRU as well as the National Peanut Research Laboratory in Dawson, Georgia.

The SEWRU, CGBRU, and LSS/AO occupy administrative and laboratory buildings on the USDA-ARS Tifton Campus (Project Site) and on the adjacent University of Georgia (UGA) campus in Tifton, Georgia (GA). The USDA-ARS lease with UGA for these buildings expires in 2023. The USDA-ARS is proposing a consolidation and modernization project for the Project Site. The project would provide more laboratory and administrative space on the Project Site and would reduce the amount of leased space from UGA. The project would include demolishing outdated structures, constructing new and modern buildings, renovating the largest laboratory building on the Project Site, and upgrading utility and roadway infrastructure.

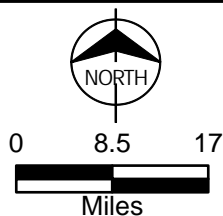
#### **1.1.1 Project Location**

The Project Site is located on Davis Road in Tift County, GA, approximately five miles northwest of the Tifton city center. Tifton is in the central portion of the state 105 miles south of Macon, GA and 52 miles east of Albany, GA (Figure 1-1). Tift County is comprised of 269 square miles. The Project Site is bordered to the north by Davis Road, Coastal Way to the east, Bermuda Drive to the south, and UGA property to the west. The Project Site is currently accessed from the south via Bermuda Drive and from the north via Davis Road (Figure 1-2).

The Project Site is in a rural suburban area of Tifton. Crop fields, primarily for research, surround the Project Site to the east, west, and south. University of Georgia administrative buildings also border the Project Site to the north and south.



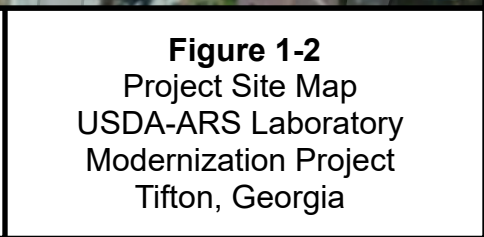
- Site Boundary
- State Boundary
- County Boundary



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**Figure 1-1**  
General Vicinity Map  
USDA-ARS Laboratory  
Modernization Project  
Tifton, Georgia





### 1.1.2 Project Site Description

The Project Site is 5.25 acres at approximately 380-feet above mean sea level (asl). The Project Site is primarily developed with buildings, structures, and paved parking lots and roads. Maintained lawns and mowed grasses are interspersed throughout the buildings and parking lots. Crops are planted in the northwest corner of the Project Site and are covered with hoop house structures. The northeast/eastern corner of the Project Site is partially forested with planted pine trees; and other ornamental trees are planted throughout the northern portion of the Project Site.

Buildings and structures on the Project Site vary in size, materials, and age. There are six one-story, brick masonry buildings onsite that were constructed in the 1960's. In addition to buildings, there are 17 storage sheds, mobile storage units, outdoor cold storage units, and greenhouse structures, which serve as agriculture research space, office space, and storage. Support structures were constructed between the 1960s to 1990s.

## 1.2 Purpose and Need for the Proposed Action

The purpose of the consolidation and modernization project (Proposed Action) is to relocate Scientist Years (SYs) currently located on the adjacent UGA campus to a modernized facility on the Project Site and reduce the number of leased facilities with UGA. The current lease with UGA expires in 2023. Table 1-1 summarizes the SYs currently on the Project Site and the proposed SYs to relocate. A SY defines the number of scientists working at a facility. One SY includes a scientist, his/her support personnel, and limit of 3,000 gross square feet (GSF) of space.

**Table 1-1 Current and Proposed SYs for the Project Site**

Unit	Currently on the Project Site	Proposed to Relocate from UGA Tifton Campus to the Project Site	Total
SWERU	3	8	11
CGBRU	4	3	7
TOTAL			18

USDA-ARS proposes to relocate the 11 SYs to the Project Site before the current lease expires. Some SEWRU and CGBRU SYs would remain on the UGA campus, but the USDA-ARS would reduce the amount of leased space needed to support their mission.



The USDA-ARS Tifton Southeast Watershed and Crop Genetics and Breeding Research Units Program of Requirements (POR) document was completed in April 2021, and outlines options for personnel and space requirements on the Project Site through interviews and data gathering with area leadership, location administration, and SYs (USDA & LSY, 2021). The project's purpose, need, proposed action, and alternatives analysis was developed from the data collection and initial design conducted through the POR process.

The consolidation and modernization project is needed in order to:

- 1) Reduce costs and optimize current funding for the USDA-ARS
- 2) Consolidate compatible facilities of both SEWRU and CGBRU SYs to a single campus
- 3) Upgrade and modernize the aging and outdated USDA-ARS facilities and infrastructure at the Project Site while allowing current operations to continue
- 4) Provide additional space for the future needs of both SEWRU and CGBRU

Consolidating most of the SYs to one campus would meet the need of saving costs by decreasing the amount of leased space from UGA, a non-government entity. The long-term benefits of occupying federal facilities would not only reduce or eliminate costly leases, but also the uncertainty of the whether the lease will be renewed. UGA may choose not to renew the lease and repurpose the USDA-occupied buildings for other uses.

Additionally, renovating and repurposing some of the current buildings on the Project Site would save costs instead of demolishing all the current buildings and constructing all new facilities. Renovating and reusing some of the current buildings would also allow current SEWRU and CGBRU operations to continue with less disruption during the consolidation process. Demolishing the current buildings and reconstructing new facilities would cause significant disruption and delays to current research operations.

Consolidating more SYs to a single campus would allow the programs to more efficiently collaborate and share resources and equipment. Currently the SEWRU and CGBRU are in multiple locations and consolidating them to the Project Site would meet the need of streamlining similar functions and research groups together to create a more collaborative and shared environment.

Constructing the new buildings, renovating existing buildings, and upgrading utility and roadway infrastructure at the Project Site would meet the need of providing modernized facilities and safer worker conditions to support the ongoing SEWRU and CGBRU missions. The current buildings are outdated with aging infrastructure and utility systems that are marginal and energy intensive for supporting wet

laboratories requiring one-pass air flow. Additionally, the Project Site has poor traffic flow and inadequate parking, creating unsafe conditions for staff and visitors.

The new buildings would also meet the need of providing additional laboratory and storage spaces to accommodate SEWRU and CGBRU future growth. The upgraded utility systems would also allow capacity for future installation of new equipment in both existing and proposed laboratories.

The following aging facilities and infrastructure need to be improved, removed, and/or constructed to support the ongoing SEWRU and CGBRU missions:

- Building 001 – a one story, brick-masonry building containing research laboratories and office space. The building was constructed in 1962 and renovated in 1978 to replace the boiler. The building was renovated again in 1982 to replace the ceiling tiles, lighting, and the heating, ventilation, and air conditioning (HVAC) system. The laboratories are outdated technology and in need of expansion and renovation. Additionally, the Building 001 utility systems are marginal and energy intensive for supporting the wet laboratories which require one-pass air.
- Realignment of the north-south roadway transecting the Project Site – demolishing the existing hoop houses (Buildings 091 and 092) would allow for a new entrance and realigned roadway through the Project Site. The realignment would eliminate blind corners and driving safety concerns on the Project Site while allowing for additional space to construct new buildings.
- Construct new 3-story Laboratory Building with connector to Building 001 – the existing laboratory space in Building 001 is inadequate to support the 11 additional SYs that would relocate to the Project Site. With limited space on the Project Site, a new multi-story, modern laboratory facility would be constructed in the footprint of the existing hoop houses (Buildings 091 and 092).
- Construct new 2-story Support Building – existing storage space onsite is also limited, and a new, multi-story support building would be constructed to house laboratory supplies and equipment for all 18 SYs proposed for the Project Site. The support building would be constructed in the footprint of the existing hoop houses (Buildings 091 and 092).
- Constructing new parking areas east of Building 001 and north of the new Support Building – additional parking spaces would be required to support the 11 SYs proposed to relocate to the Project Site. Additional new parking lots would be constructed in the maintained lawn/undeveloped

spaces in the northern portion of the Project Site. A new 7,400 square foot stormwater pond will be constructed adjacent to the new parking lots.

### **1.3 Scope of the Environmental Assessment**

This Environmental Assessment (EA) has been prepared in accordance with the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (Code of Federal Regulations (CFR) at 40 CFR 1500-1508), USDA NEPA regulations at 7 CFR 1b, and ARS NEPA regulations at 7 CFR 520. USDA-ARS regulations require an EA to be prepared for a proposed action representing new construction. USDA-ARS has established separate procedures for evaluating the environmental effects of research programs and construction projects and each research project conducted at an USDA-ARS facility will undergo separate NEPA consideration. Only the physical impacts of the Proposed Action will be evaluated in this EA. The USDA-ARS determined that an EA must be prepared for the consolidation and modernization of the SEWRU and CGBRU campus in Tifton, GA. The EA will evaluate and describe the environmental impacts of the modernization of the SEWRU and CGBRU as outlined in the POR document (USDA & LSY, 2021).

The EA evaluates the impacts of the Proposed Action and provides the USDA-ARS Area Director with the information necessary to determine whether an Environmental Impact Statement (EIS) should be prepared or if a Finding of No Significant Impact (FNSI) is appropriate. An EIS is prepared if the EA determines that significant effects could occur, if no significant impacts are identified in the EA, then a FNSI is prepared documenting the decision not to prepare an EIS.

### **1.4 Public Involvement**

Under NEPA regulation 40 CFR 1506.6 and 7 CFR 520.3, USDA-ARS will encourage public and relevant agency involvement in the EA process. Initial coordination letters were mail on September 9, 2021, to the U.S. Fish and Wildlife Service, Department of the Interior, the Nature Conservancy, the Georgia Environmental Protection Division Georgia Department of Natural Resources, and the Georgia Conservancy. Additionally, the project is being coordinated with the Georgia Historic Preservation Division under Section 106 of the National Historic Preservation Act (NHPA). None of the other agencies provided a response to the project. The initial coordination letters are included in Appendix A. The Section 106 correspondence is included in Appendix B.

A Notice of Availability (NOA) of the official public Draft EA and Draft FNSI will be published in the local newspaper and distributed to the agencies. The NOA will request comments from the public and agencies on the Draft EA. The Draft EA and Draft FNSI will be available for a 30-day review period.

## 1.5 Environmental Laws and Regulations

There are multiple permits, approvals, registrations, and consultations that must be considered and/or obtained for the project. Table 1-2 provides an overview of the anticipated permits and approvals.

**Table 1-2 Permit and Approval List**

Permit/Approval	Associated Documentation	Approving Agency	Applicability
<b>Federal Permits, Approvals, Registrations, or Consultations</b>			
Endangered Species Act Section 7 (ESA)	Information for Planning and Consultation (IPaC) and No Effect Determination due to lack of suitable habitat	U.S. Fish and Wildlife Service (USFWS)	No Consultation Required
Migratory Bird Treaty Act (MBTA)			
Bald and Golden Eagle Protection Act (BGEPA)			
Farmland Protection Policy Act (FPPA)	Farmland Conversion Impact Rating: Form AD-1006	Natural Resources Conservation Service (NRCS)	Not Applicable
Section 404 Clean Water Act	Wetland and Waterbody Delineation Report	U.S. Army Corps of Engineers Savannah District	Not Applicable
<b>State Permits, Approvals, Registrations, or Consultations</b>			
Section 106 National Historical Preservation Act Consultation	Phase I Cultural Resources Survey Report	Georgia Historic Preservation Division	Consultation Required
§401 Clean Water Act – Water Quality Certification	Wetland and Waterbody Delineation Report	Joint Application Process. Georgia has MOA with USACE-Savannah District.	Not Applicable
Construction General Permit No. GAR100003 under the National Pollutant Discharge Elimination System (NPDES)	Stormwater Pollution Prevention Plan and Spill Prevention, Control, and Countermeasures Plan.	Georgia Department of Natural Resources (GADNR) – Environmental Protection Division	Permit Required
State Listed Species Consultation	Protected Species Habitat Assessment Report	GADNR, Wildlife Resources Division	Consultation Recommended
<b>Local Permits, Approvals, Registrations, or Consultations</b>			
Building Permits	Construction Plans	City of Tifton, Building Division	Permits required

The proposed USDA-ARS Tifton consolidation and modernization project requires compliance with the federal regulations and Executive Orders (EOs) as referenced above and summarized below.

### **1.5.1 Clean Water Act and Rivers and Harbors Act**

The U.S. Army Corps of Engineers (USACE) administers Section 404 of the Clean Water Act (CWA), which regulates dredge and fill activities in waters of the U.S. [33 United States Code (USC) 1344], as well as Section 10 of the Rivers and Harbors Act, which regulates the placement of structures in waters of the U.S. (33 USC 403). The project is located within the Savannah District. Georgia has a memorandum of agreement and a joint application process with the Savannah District, which manages the Section 404 regulatory program throughout the state. The USACE incorporates the State's conditions exactly as the State writes them. Section 401 Certification is generally issued in advance of the Corps Section 404 permit. In instances where the Corps may issue a provisional Section 404 permit, they will incorporate the standard Section 401 boilerplate language, but such provisional permits are inactive until the State actually issues Certification.

Impacts to jurisdictional waters of the U.S. (as defined in 40 CFR 230.3[s]) would require authorization from USACE under Section 404 of the CWA. Impacts resulting in a permanent loss of wetlands greater than 0.5 acre would require a Section 404 Individual Permit, which may include mitigation and public involvement. The USACE established the Nationwide Permit (NWP) program to streamline the Section 404 permitting process for actions that would have no more than a minimal effect on the environment. If permanent wetland impacts (i.e., permanent fill resulting in the loss of wetland function) range from 0.1 to 0.5 acre, USACE notification and application is required to obtain an NWP. The project would not result in impacts on wetlands, as discussed in greater detail in section 3.4 of this EA. Because there are no waters of the U.S. within or adjacent to the Project Site, no USACE permits are anticipated for the project. The Project will disturb more than 1 acre of land and will require coverage under the Construction General Permit No. GAR100003. Prior to construction commencing, a Stormwater Pollution Prevention Plan and Spill Prevention, Control, and Countermeasures Plan will need to be prepared, and a Notice of Intent will need to be submitted and approved by the GADNR.

### **1.5.2 Endangered Species Act of 1973**

The Endangered Species Act of 1973 (ESA), as amended, was enacted to protect, and recover imperiled species and the ecosystems upon which they depend. The law requires federal agencies, in consultation with the U.S. Fish and Wildlife Service and/or the National Oceanic and Atmospheric Administration (NOAA) Fisheries Service, to ensure that actions they authorize, fund, or carry out are not likely to jeopardize the continued existence of any listed species or result in the destruction or adverse modification of designated critical habitat of such species. The law also prohibits any action that causes a "taking" of any listed species of endangered fish or wildlife. Further details regarding species listed as Threatened and Endangered (T&E) under the ESA are included in section 3.3.

### **1.5.3 National Historic Preservation Act**

Section 106 of the National Historic Preservation Act (NHPA) requires federal agencies to take into account the effects of their undertakings (including issuance of permits) on historic properties, and afford the Advisory Council on Historic Preservation a reasonable opportunity to comment. State Historic Preservation Officers (SHPOs) and Tribal Historic Preservation Officers (THPOs) serve a critical role in implementing many responsibilities under the NHPA. Central to this framework is the National Register of Historic Places (NRHP), which is the official list of historic properties worthy of preservation. The Georgia Historic Preservation Division, which acts as the SHPO for the State of Georgia, has reviewed and commented on potential project impacts; however, consultations are still underway. The SHPO does not issue permits; however, approvals by other federal agencies cannot be final without review by and clearance from the SHPO.

### **1.5.4 Georgia State-Protected Species**

The Georgia-protected species list includes plant and animal species for which legal protection is provided under the State Wildlife Action Plan (2005) and Georgia Rule 391-4-10 (Protection of Endangered, Threatened, Rare, or Unusual Species). The purpose of these rules and regulations is to establish the organizational structure and administrative procedures to be followed in the protection of endangered species of plant and animal life. The GADNR is authorized to promulgate rules and regulations for the protection of designated species.

## 2.0 DESCRIPTION OF PROPOSED ACTION AND ALTERNATIVES

This chapter describes the Proposed Action and alternatives considered but eliminated in accordance with CEQ guidance in 40 CFR Part 1502.14. According to the POR document, several scenarios to consolidate and modernize the SYs, administration, and offices for both programs were considered. Concepts including construction of new facilities, renovation of existing facilities, and combinations incorporating new development and renovation of existing facilities were considered.

### 2.1 Proposed Action

The Proposed Action incorporates the consolidation and modernization of the Project Site that meets the current and projected needs of both the SEWRU and CGBRU.

Detailed components of the Proposed Action plan are shown in Figure 2-1 and discussed in detail as follows. Components of the Proposed Action include:

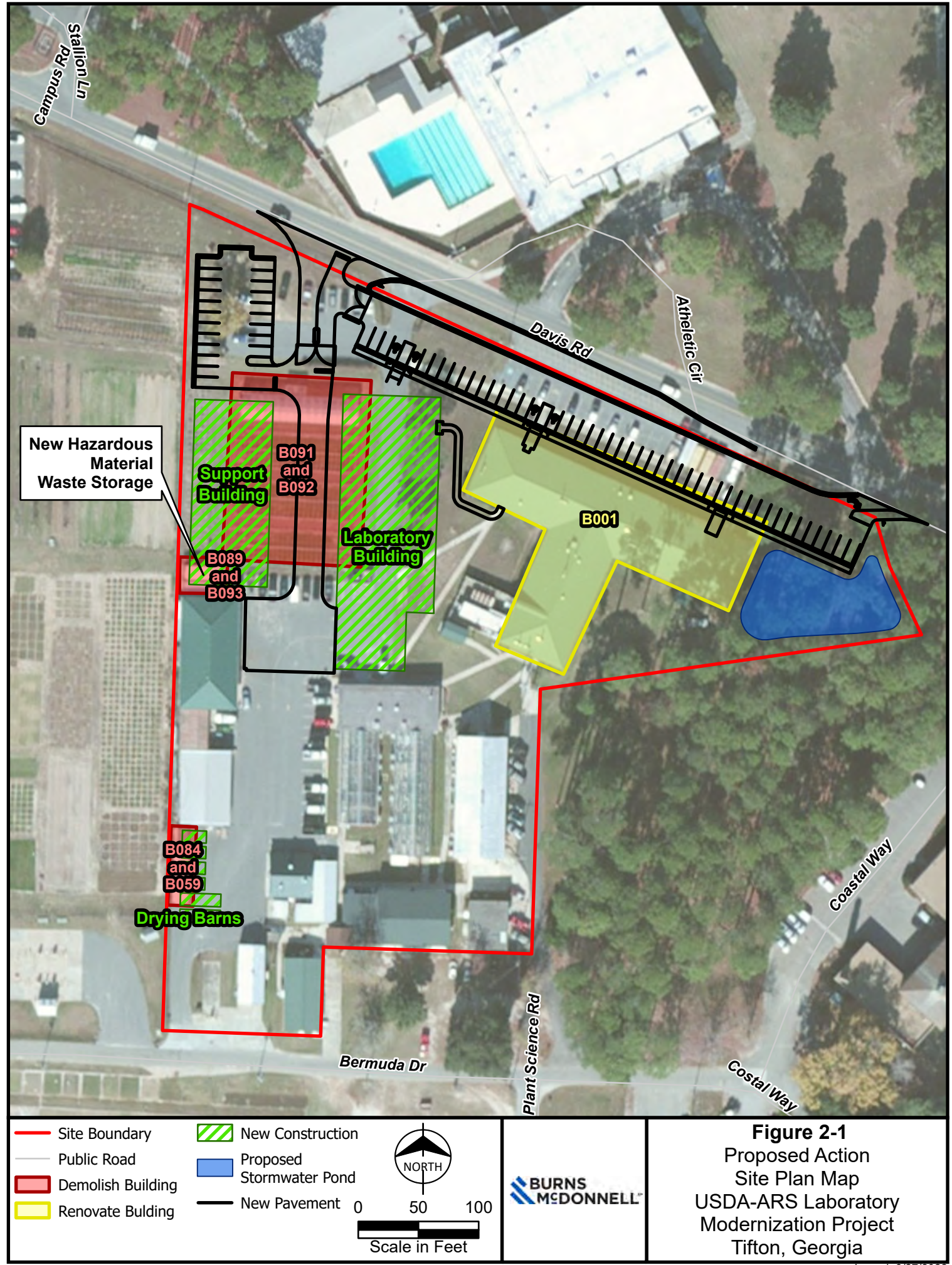
- Construction of the new Laboratory Building
- Construction of the new Support Building
- Demolition of existing buildings, and relocation or reconstruction of smaller structures
- Realignment of the roadway transecting the Project Site, construction of additional parking areas, and construction of a new 7,400 square foot stormwater pond
- Building 001 renovation

USDA-ARS proposes to construct a 42,200 GSF new Laboratory Building on the Project Site to accommodate all 18 SYs along with additional space for future growth. The Laboratory Building would be a three-story steel frame structure with brick veneer and metal paneling with a standing seam mono sloped roof. The Laboratory Building would include several wet laboratory rooms, office space, and additional storage. There would a mix of recirculating and one-pass air, laboratory compressed air throughout, multiple local network vacuum systems, and a generator for refrigeration systems.

USDA-ARS proposes to construct a 18,045 GSF Support Building for storage and maintenance of farm equipment, greenhouse/headhouse, grain drying sheds, fertilizer, and pesticide storage areas. The new Support Building with be constructed with a two-story steel frame and concrete masonry united with a standing seam metal roof. The Support Building will house an overhead crane to bring equipment to the second-floor storage areas and will include small field science laboratory areas.



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Service Layer Credits: World Imagery (Clarity). This work is licensed under the Esri Master License Agreement. View Summary | View Terms of Use | Export. This layer is not intended to be used to export lines for offline. Data Collection and Editing. This layer may be used in various ArcGIS apps to support data collection and editing, with the results used internally or shared with others, as described for these use cases.





The primary north-south roadway would be realigned to improve traffic flow and allow construction of new facilities. Construction of new parking lots north of Building 001 and north of the new Support Building are proposed. Implementation of the new roadways, parking lots, and new buildings would require demolition or removal of Building 091 (greenhouse) and Building/structures 092 (hoop houses).

The Building 001 utility systems are marginal and energy intensive for supporting wet laboratories requiring one-pass air. In lieu of continued repairs and upgrades needed to repair infrastructure deficiencies, wet laboratories currently located in Building 001 would be relocated to the new laboratory/office building. Vacated space will be utilized to support field workrooms and dry laboratories more compatible with currently available systems. HVAC replacement, ceiling and lighting replacement, and main switchgear replacement are proposed for the Building 001 renovation.

Two existing drying barns and several prefabricated drying barns will be relocated or acquired to consolidate all drying barns within the Project Site. Drying barns would be relocated to the southwest portion of the Project Site, where Building 084 and Building 059 are currently located. Building 059 (Hazardous Material Waste Storage) would be demolished and reconstructed north of Building 002 where Buildings 089 and 093 are currently located. Buildings 089 and 093 are proposed for demolition.

Table 2-1 summarizes the Proposed Action and provides additional information for the buildings on the Project Site that will be affected by the Proposed Action.

**Table 2-1 Buildings on the Project Site Affected by the Proposed Action**

Building	Building Purpose	Year Constructed	Square Footage	Proposed Action	Description of Proposed Action
B001	Laboratories	1962	19,517	Renovate	Replace outdated infrastructure, including full HVAC replacement, ceiling and lighting replacement, main switchgear replacement, and minor interior renovations and demolition of non-load bearing walls.
B059	Hazardous Material Waste Storage	1980s	477	Demolish	Location of new drying barns
B084	Chemical Storage	1980s	135	Demolish	Location of new drying barns. A new chemical storage building would be constructed adjacent to B002
B089	Drying Barns	1970s	357	Demolish	Location of new Support Building. New drying barns will be constructed where B084 and B059 are currently located.
B091	Greenhouse	1970s	160	Demolish	Location of new Support Building, new Laboratory Building, and new roadway alignment

Building	Building Purpose	Year Constructed	Square Footage	Proposed Action	Description of Proposed Action
B092	Hoop Houses	1970s	N/A	Demolish	Location of new Support Building, new Laboratory Building, and new roadway alignment
B093	Drying Barns	1970s	340	Demolish	Location of new chemical storage building. New drying barns will be constructed where B084 and B059 are currently located.
Laboratory Building	Wet Laboratories	N/A	42,200	Construction	Provide wet laboratories, additional office space, and additional storage for SYs relocating to the Project Site.
Support Building	Multiple	N/A	18,045	Construction	Provide laboratory space, storage and maintenance for field equipment, greenhouses/headhouses, drying shed, and fertilizer and pesticide storage.

The actions described above would take place over approximately 30 months, with the more critical needs taking priority. Since future needs of both SEWRU and CGBRU would be accounted for as well, the actions proposed would be taken in a phased approach, similar to the phasing of a master plan only on a much smaller scale.

## 2.2 No Action Alternative

Under the No Action Alternative, the SEWRU and CGBRU would continue operating in existing facilities in Tifton, GA. The USDA-ARS' lease with UGA expires in 2023. Therefore, new lease agreements with the University would need to be pursued. If the lease could not be renewed, operations in facilities on the UGA property could not continue and alternative offsite facilities would need to be identified. Under the No Action Alternative, SEWRU and CGBRU would continue to operate at different locations and in facilities that are primarily outdated, inefficient, require frequent maintenance and repair or are otherwise inadequate.

## 2.3 Alternatives Eliminated from Further Study

USDA-ARS considered several other alternatives to meet the purpose and need of consolidation and modernization project. The different alternatives considered are discussed in detail in the following sections. Several additional scenarios with minor alterations to the alternatives discussed below were evaluated but not pursued. These alternatives were also eliminated from further analyses due to cost and construction phasing concerns. Additionally, the alternatives analyzed included new construction of the greenhouse and headhouse at the lowest point in the southeast corner of the Project Site, which is more suitable for parking facilities that would provide drainage and mitigate flooding.

### **2.3.1 Alternative 1**

Under Alternative 1 (Figure 2-2), USDA-ARS would demolish Building 001 and construct a new parking area and field support building in its place. The existing greenhouse and headhouse would be demolished and replaced with a newly constructed 11,025 GSF greenhouse and newly constructed 5,418 GSF headhouse with insectary and field workrooms.

A new two-story new field support facility would be constructed along the northwest boundary of the Project Site with a 35,200 GSF first floor and a 29,760 GSF second story. The first floor would house field workrooms, field science, dry science, offices, and collaborative spaces. The second floor would house wet science, science support, offices, and collaborative spaces. Adjacent to the south of the two-story facility, there would be a 5,270 GSF loading dock and logistics platform and a 675 GSF personnel support area.

In addition to the new greenhouse and headhouse, four new field support buildings totaling 20,280 GSF would be constructed which would serve as equipment storage and drying barns. Construction of additional parking lots and a roadway realignment through the campus would also be required for this alternative.

Alternative 1 was eliminated from further analysis as it was cost prohibitive, and funding is not available to conduct a full demolition and rebuild of the Project Site. Additionally, continuing current operations throughout construction would not be feasible with this concept.

### **2.3.2 Alternative 2**

Under Alternative 2 (Figure 2-3), Building 001 would be reduced to 13,290 GSF and would house only compatible dry science facilities, a field workroom collaborative spaces, and offices.

A new two-story facility would be constructed in the central portion of the Project Site with a 31,213 GSF first floor and a 25,500 GSF second story. The first floor would house wet science, a field workroom, field science, offices, collaborative space, and personnel support. The second floor would house wet science, science support, collaborative space, and offices. A 5,620 GSF loading dock and logistics would be constructed adjacent to the new building to the south.

The existing greenhouse and headhouse would be demolished and replaced with a newly constructed 11,025 GSF greenhouse and newly constructed 5,418 GSF headhouse with insectary and field workrooms.

In addition to the new greenhouse and headhouse, three new field support buildings totaling 16,800 GSF would be constructed, which would serve as equipment storage and drying barns. Construction of additional parking lots and a roadway realignment through the campus would also be required for this alternative.

Alternative 2 was eliminated from further analysis as it was cost prohibitive, and funding is not available to conduct a full demolition and rebuild of the Project Site. There were also constructability concerns with demolishing only part of Building 001 due to the age of the building. Additionally, continuing current operations throughout construction would not be feasible with this concept.

### **2.3.3 Alternative 3**

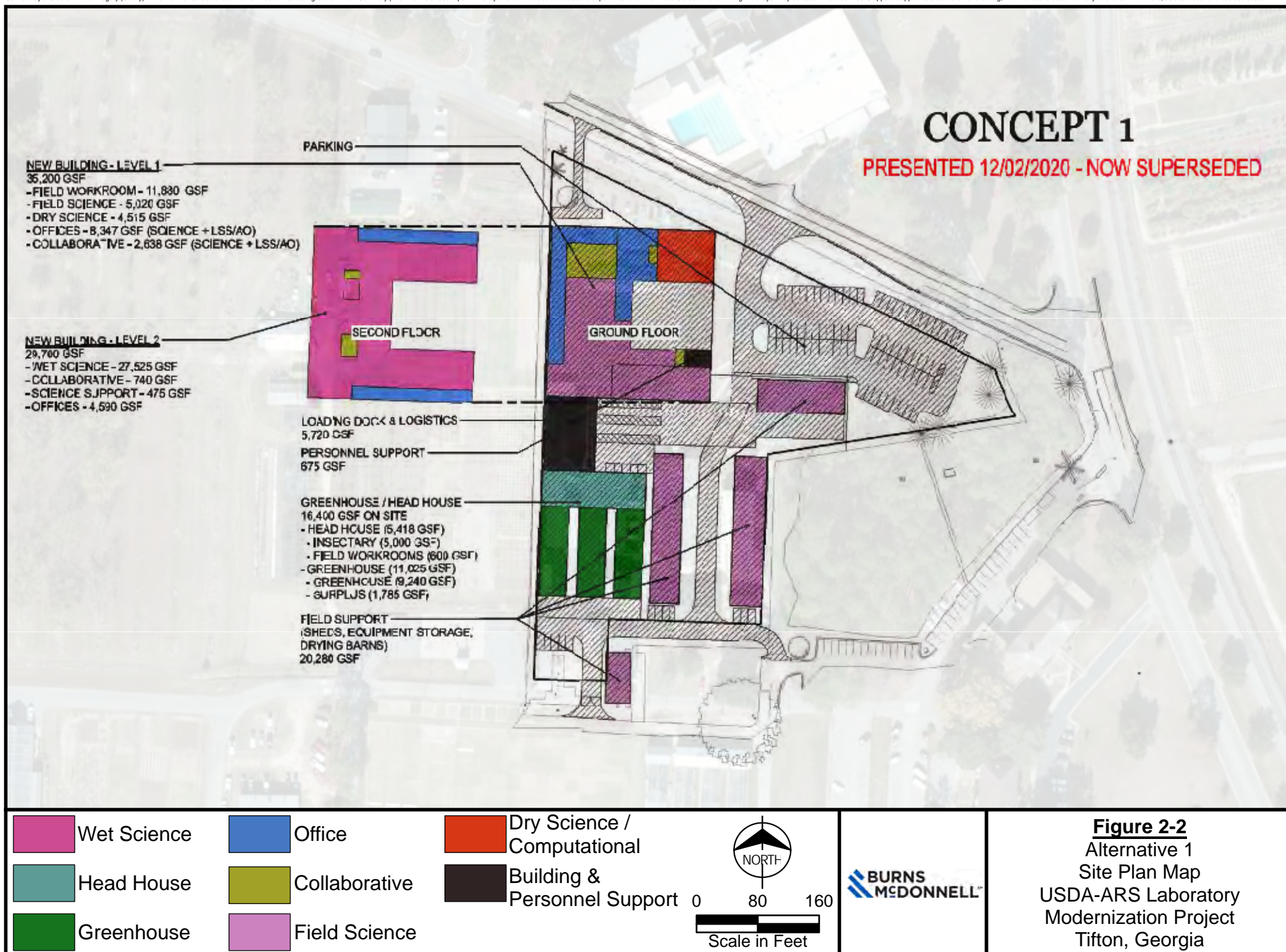
Under Alternative 3 (Figure 2-4), Building 001 would be renovated and house only compatible dry science facilities, a field workroom collaborative spaces, and offices.

A new three-story facility would be constructed in the central portion of the Project Site with a 17,430 GSF on each level. The three-story facility would support field workrooms, field science, wet science, science support, personnel support, office, and collaborative spaces. A 5,215 GSF loading dock and logistics would be constructed between the new building and the existing Building 001 to the south.

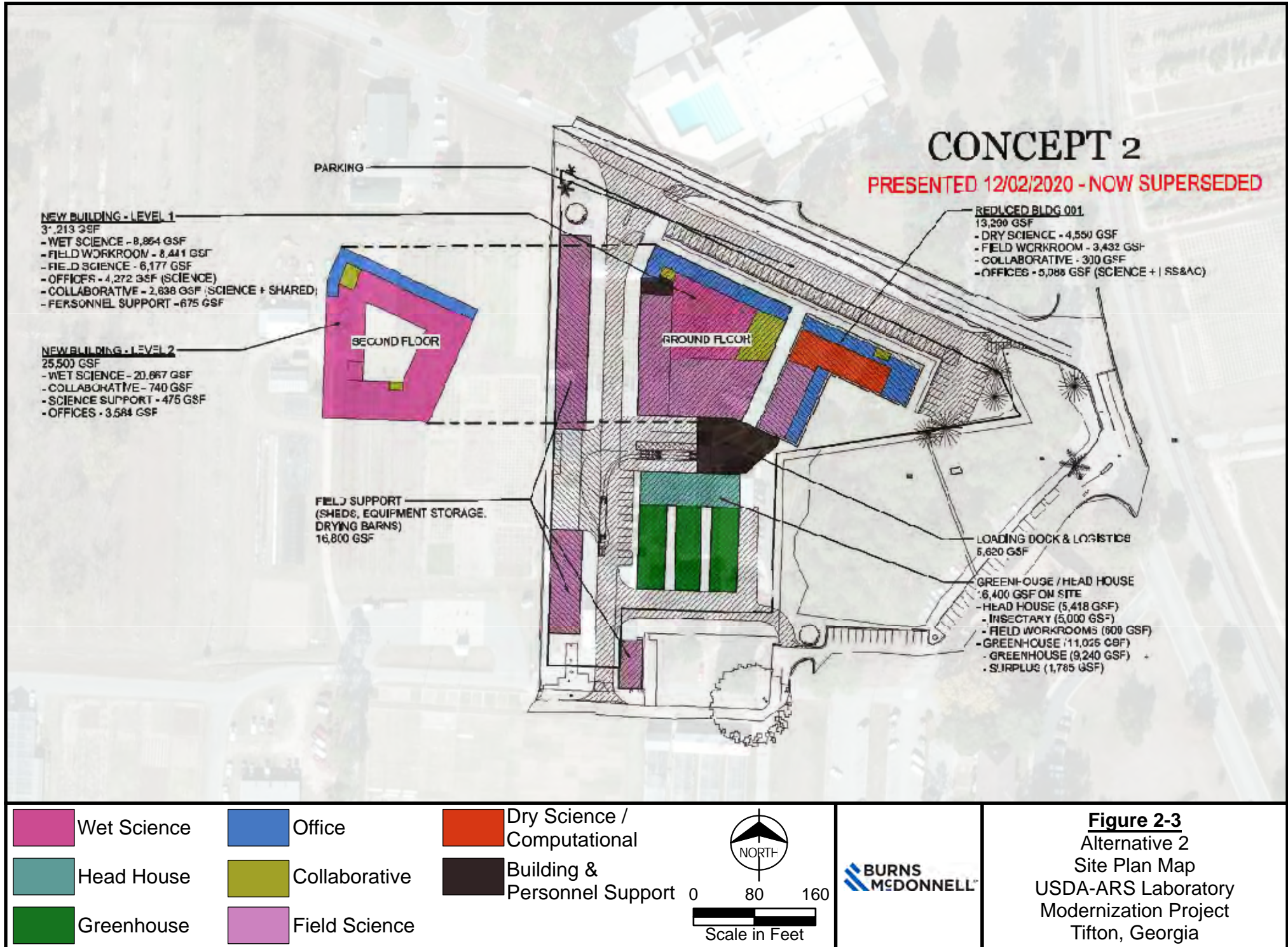
The existing greenhouse and headhouse would be demolished and replaced with a new construction 11,025 GSF greenhouse and new construction 5,418 GSF headhouse with insectary and field workrooms.

In addition to the new greenhouse and headhouse, three new field support buildings totaling 16,800 GSF would be constructed, which would serve as equipment storage and drying barns. Construction of additional parking lots and a roadway realignment through the campus would also be required for this alternative.

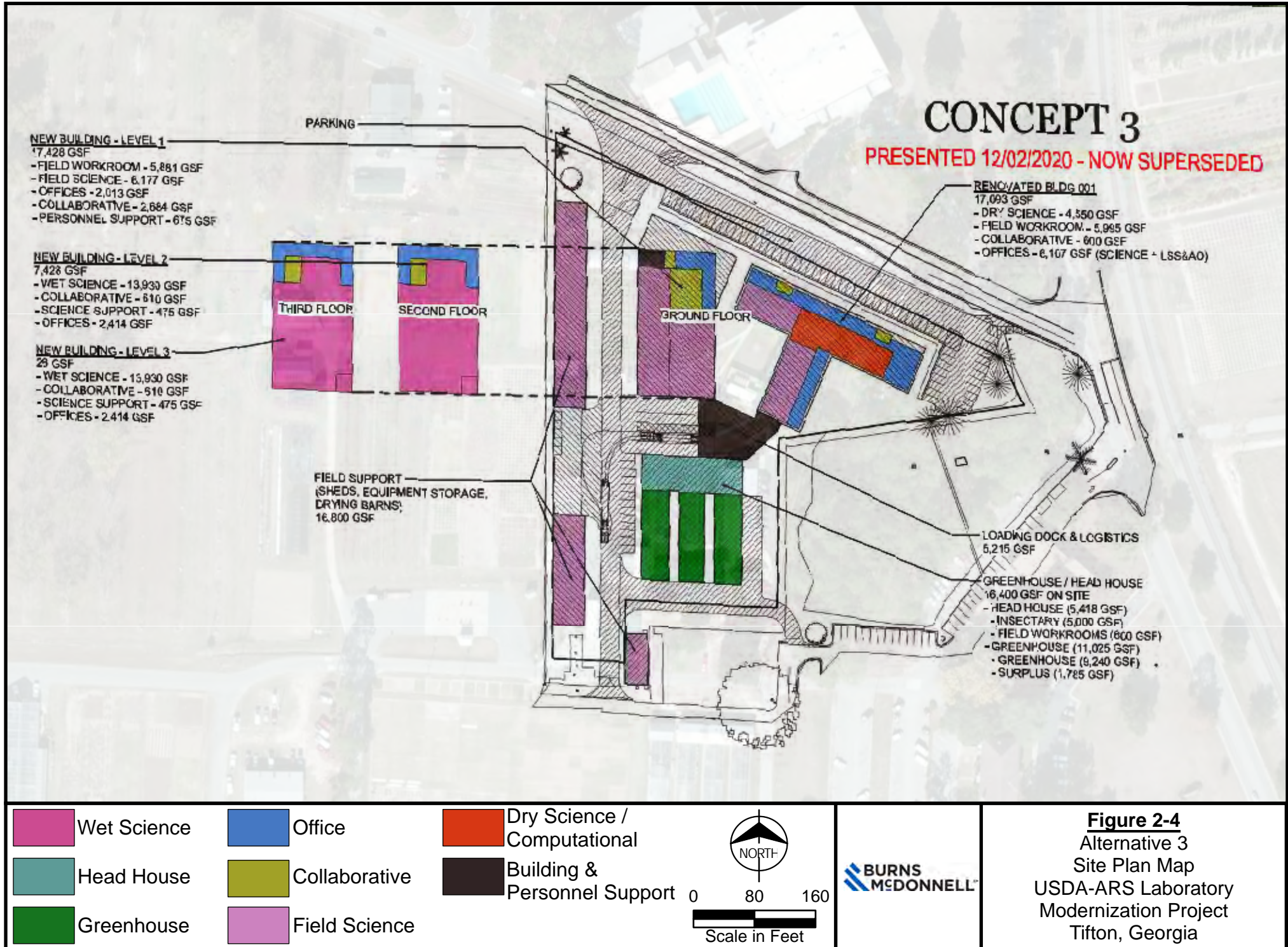
Alternative 3 was eliminated from further analysis because it was cost prohibitive to construct multiple buildings instead of consolidating all field support into one building. Implementation of Alternative 3 would also create phasing concerns with demolishing and rebuilding the greenhouse.











### **3.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES**

The affected environment sections describe the existing conditions of the natural, cultural, and social resources, against which environmental effects of the Proposed Action are evaluated. The existing environmental conditions are presented first for each environmental resource or condition, followed immediately thereafter by an evaluation of the consequence(s) of the Proposed Action. The No Action Alternative is included for a comparison between the Proposed Action and existing conditions with no action proposed.

The environmental consequences sections present a general analysis of the environmental effects on each resource area associated with the Proposed Action. Impacts are described in terms of duration, direct or indirect, magnitude, and adverse or beneficial. Definitions of these terms are described below:

- Short-term: Effects that would occur only with respect to a particular activity for a finite period, or only during the time required for construction or installation activities.
- Long-term: Effects that are more likely to be persistent and chronic, extending beyond the completion of construction.
- Direct: Effects that are caused by an action and occur around the same time at or near the location of the action.
- Indirect: Effects that are caused by an action and might occur later in time or be farther removed in distance but still be a reasonably foreseeable outcome of the action.
- Negligible: When the impacts are localized and perceptible but not measurable at the lowest level of detection.
- Minor: When the impact is localized and slight, but detectable.
- Moderate: When the impact is readily apparent and appreciable.
- Significant: When the impact is severely adverse, major, and/or highly noticeable.
- Adverse: When the impact has an unfavorable or undesirable outcome on the man-made or natural environment.
- Beneficial: When the impact would have a positive outcome on the man-made or natural environment.



### **3.1 Land Use**

#### **3.1.1 Affected Environment**

Land use on the Project Site is primarily commercial development, paved parking lots, and improved land and landscaped areas. The UGA Tifton Campus is located immediately north and southeast of the Project Site. The campus includes buildings, parking lots, and other improved lands and development. Agricultural and croplands for research purposes border the Project Site to the east, west, and south. A small fueling station also borders the Project Site to the southwest.

#### **3.1.2 Environmental Consequences**

##### **3.1.2.1 Proposed Action**

Land use in the vicinity of the research facility would remain as it currently exists under the Proposed Action. Existing buildings at the proposed sites are institutional, research laboratory, and office structures associated with USDA-ARS functions. Thus, there would be no impacts to land use with the construction of the new laboratory building and support buildings, building 001 renovations, or roadway realignment and parking areas.

##### **3.1.2.2 No Action Alternative**

No adverse impacts would occur to land use under the No Action Alternative. Under the No Action Alternative, SEWRU and CGRBU would continue operating in existing facilities that are primarily outdated, inefficient, require frequent maintenance and repair, or are otherwise inadequate. The work and research that occurs at Building 001 and support buildings are essential and would not cease operations despite inefficient and outdated workspaces.

### **3.2 Geology, Topography, and Soils**

This section describes the existing geological resources at the Project Site and the potential impacts on these geological resources that would be associated with the No Action and Proposed Action Alternatives. Components of geological resources that are analyzed include geology, geological hazards, paleontology, soils, and prime farmland. The Project Site generally drains to the east.

#### **3.2.1 Affected Environment**

##### *Geology*

The Project Site is in the Southern Coastal Plain Major Land Resource Area (MLRA) in Central Georgia (NRCS 2006). This Project Site is in the East Gulf Coastal Plain section of the Coastal Plain Physiographic

Province. The Coastal Plain Province is generally underlain by poorly consolidated clastic rocks from the Mesozoic and Cenozoic (Jurassic to Quaternary) age [National Park Service (NPS) 2018].

### *Topography*

Existing USGS topographic maps, in addition to a site investigation, indicate the Project Site is relatively flat and similar to surrounding topography. Elevation within the Project Site ranges from approximately 377 feet to 383 feet above mean sea level (asl) and is developed within a relatively urban area with a small portion of fragmented forested land on the eastern portion of the parcel. The Project Site generally drains to the east and south.

### *Soils*

There is one soil map unit within the Project Site, as identified in the USDA NRCS geospatial data for Tift County. Tifton-Urban land Complex, 0-5 percent slopes is the map unit throughout the Project Site (USDA 2021a). Tifton Urban land complex, 0-5 percent slopes is derived from loamy marine deposits and typically well drained, does not frequently flood or pond, and has restrictive features more than 80 inches below the surface. There is no prime farmland or farmland of statewide importance within the Project Site (USDA 2021b).

## **3.2.2 Environmental Consequences**

### **3.2.2.1 Proposed Action**

#### *Geology*

Proposed demolitions of existing structures would not affect geology surrounding the campus. Renovations would occur solely to the buildings 001 and 003, which would include some exterior features such as the roof, some windows, and doors etc. to be replaced and would not affect geology surrounding the campus. Construction of the new laboratory and support buildings may result in minor, short-term, direct impacts to geology from minor grading and small excavations required for the new construction. Excavations would be associated with structural foundations and would be shallow and utilize existing contours to the extent practicable. Due to the limited areas and shallow subsurface disturbances, minor long-term, direct impacts to subsurface geological resources are anticipated.

#### *Topography*

Changes to topography resulting from implementation of the Proposed Action are not anticipated.

### *Soils*

The areas around Buildings 001 and 003, new laboratory building, and new support buildings proposed for renovation and construction are currently developed, so minimal undeveloped land would be impacted during renovation and construction. No substantial soil disturbance would take place. The soil disturbance associated with the proposed parking lot associated with Building 001 is less than approximately 0.3 acres and is expected to need minimal grading. Therefore, impacts to soils would be direct, short-term, and negligible. Soil movement and disturbances would be mitigated using sediment and erosion controls that would be implemented during renovation, demolition, and construction activities. Best management practices (BMPs) would be implemented to prevent erosion. The project would be conducted in accordance with *Georgia's Soil and Water Conservation Commission's Manual for Erosion and Sediment Control in Georgia*.

#### **3.2.2.2 No Action Alternative**

Under the No Action Alternative, the proposed modernization and consolidation project would not occur; therefore, no Project-related impacts on topography, geology, or soil resources, would result. Existing land use would be expected to remain developed land for commercial purposes.

### **3.3 Biological Resources**

This section provides an overview of the existing biological resources within the Project Site and the potential impacts to those resources from implementation of the Proposed Action and the No Action Alternative. Biological resources analyzed in this section include vegetation, wildlife, and rare, threatened, and endangered species.

#### **3.3.1 Affected Environment**

##### *Vegetation*

The Project Site is within the East Gulf Coastal Plain Ecoregion which spans portions of Georgia, Florida, Alabama, Mississippi, and Louisiana. Ecological systems within the ecoregion range from sandhills and long-leaf pine uplands to pine flatwoods and savannas, seep bogs, and bottomland hardwood forests, barrier islands and sand dunes. The region was historically dominated by fire-maintained long-leaf pine and slash pine woodlands with associated seepage bogs and depressional wetlands. Currently, the range of long-leaf pine and slash pine woodlands has been reduced to less than five percent of the former range. Remaining areas of the ecoregion are mostly fragmented and lack needed natural fire maintenance which is critical to the health of these ecosystems (The Nature Conservancy 2018).

Areas surrounding the city of Tifton are primarily used for agriculture. The Project Site is within the more developed urban area of Tifton and is almost entirely cleared of any naturally occurring vegetation because it is currently developed for the existing campus. There is an approximately 0.6 acres portion of the parcel that contains pine trees (*Pinus spp.*) in the northeast corner of the Project Site. The pine tree stand within the Project Site consists of mature trees approximately 40-60 years old. There is no understory layer, and the herbaceous layer consists of maintained lawn. Maintained lawn and ornamental shrubs are the only other representative vegetation within the Project Site.

### *Wildlife*

Mammals commonly found throughout central Georgia include coyotes (*Canis latrans*), white-tailed deer (*Odocoileus virginianus*), otters (*Lontra canadensis*), beavers (*Castor canadensis*), skunks (*Mephitis mephitis*), opossums (*Didelphis virginiana*), racoons (*Procyon lotor*), squirrels (*Sciurus spp.*), and armadillos (*Dasypus novemcinctus*) (GADNR 2021).

Reptiles and amphibians commonly found in the region include a variety of turtles, lizards, frogs, and snakes. Fence lizards (*Sceloporus spp.*), five-lined skinks (*Plesitiodon fasciatus*), and anoles (*Anolis spp.*) are commonly observed lizards. Chorus frog (*Pseudacris sp.*), cricket frog (*Acris gryllus*), green tree frog (*Hyla cinerea*), American toad (*Anaxyrus americanus*), eastern spadefoot toad (*Scaphiopus holbrookii*), marbled salamander (*Ambystoma opacum*), spotted salamander (*Ambystoma maculatum*), and dusky salamander (*Desmognathus fuscus*) are often observed in the region. Non-venomous snakes include garter snake (*Thamnophis sirtalis*), king snake (*Lampropeltis spp.*), rat snake (*Pantherophis spp.*), and water snake (*Nerodia spp.*), while venomous species include coral snake (*Micrurus fulvius*), cottonmouth (*Agkistrodon piscivorus*), pygmy rattlesnake (*Sistrurus miliarius*), and diamondback rattlesnake (*Crotalus adamanteus*) (GADNR 2021).

Birds commonly found in the region include wild turkey (*Meleagris gallopavo*), northern mockingbird (*Mimus polyglottos*), red-winged blackbird (*Agelaius phoeniceus*), northern cardinal (*Cardinalis cardinalis*), American crow (*Corvus brachyrhynchos*), mourning dove (*Zenaida macroura*), red-tailed hawk (*Buteo jamaicensis*), American robin (*Turdus migratorius*), starling (*Sturnus vulgaris*), black vulture (*Coragyps atratus*) and turkey vulture (*Cathartes aura*) (Sibley, 2017).

The pine tree stand within the Project Site provides limited habitat for small mammals (ex: squirrels), snakes and lizards (ex: garter snake and five-lined skinks), and songbirds (ex: American robin and northern cardinal). Larger mammals (ex: white-tailed deer), snakes (rattlesnakes), and birds (ex: American crow and vultures) may traverse or temporary occupy the Project Site.

### *Protected Species*

Prior to conducting a site visit, Burns & McDonnell biologists reviewed the USFWS Information for Planning and Consultation (IPaC) for the Project Site (Appendix A), regarding special status species that may occur within the Project Site (Consultation Code: 04EG1000-2022-SLI-0801, Event Code: 04EG1000-2022-E-01750) and assessed whether the proposed project had potential to affect Endangered Species Act (ESA) listed species, bald eagles (*Haliaeetus leucocephalus*), golden eagles (*Aquila chrysaetos*), migratory birds (including raptor species), and associated habitat within the Project Site. Additionally, a review of GADNR's Wildlife Resources Division Rare Species was conducted which provided a list of state protected species and state ranked species of special concern with potential to occur within Tift County.

### **Federally Protected Species**

Three ESA-listed species and one candidate species were identified as potentially occurring within the Project Site: the eastern indigo snake (*Drymarchon corais couperi*), gopher tortoise (*Gopherus polyphemus*), Suwanee alligator snapping turtle (*Macrochelys suwanniensis*), and monarch butterfly (*Danaus plexippus*). There is no designated critical habitat for these species within the Project Site (USFWS 2021a). Each of these species are listed in Table 3-1 and described in this section.

The eastern indigo snake is an ESA-listed threatened reptile that typically require a mosaic of habitats, with a preference towards the drier conditions found in uplands. The eastern indigo snake prefers "pine and scrubby flatwoods, pine rocklands, dry prairie, tropical hardwood hammocks, edges of freshwater marshes, agricultural fields, coastal dunes, and human-altered habitats" (NPS 2021). During the winter, the eastern indigo snake requires shelter from the cold and desiccating conditions and can be found occupying Gopher tortoise burrows with regularity (NPS 2021).

Gopher tortoise is a candidate species for federal listing under the ESA. It is a reptile that spends most of its life in burrows in sandy soils. Gopher tortoises require open canopy with abundant sunlight and understory vegetation (Jensen 2018). Gopher tortoises typically prefer mature long leaf pine (*Pinus palustris*) dominated forests but will also tolerate forests dominated by other pine species such as loblolly pine, slash (*Pinus elliotii*), and shortleaf (*Pinus echinata*) (USFWS 2019). It can also be found in immature pine stands and even mixed deciduous forest. Gopher tortoises prefer to forage on grasses, prickly pear cactus (*Opuntia spp.*), and blueberries (*Vaccinium spp.*).

The Suwanee alligator snapping turtle is listed as a proposed threatened species and is the largest freshwater turtle in North America and can weigh up to 200 lbs. The Suwannee alligator snapping turtle is only found

in the Suwannee River Basin within the river, its tributaries, backwater swamps and oxbow lakes in northern Florida and Southern Georgia (USFWS 2021b).

The monarch butterfly is a candidate species for federal listing under the ESA. It is a migratory insect that is generally absent from Georgia in the winter. During their breeding period, adult monarchs can be found roosting in trees preferably pecan (*Carya illinoensis*) and oak (*Quercus spp.*), adjacent to waterbodies including ponds, bayheads, flooded pastures, oxbow lakes, and ditches (Center for Biological Diversity (CBD) date unk). Monarch butterflies are dependent on milkweed (*Asclepias spp.*) as a larval hostplant. Habitat for this species ranges from freshwater marsh habitats to dry, rocky slopes.

Migratory birds, including the bald eagle (*Haliaeetus leucocephalus*), prairie warbler (*Setophaga discolor*), American kestrel (*Falco sparverius*), and red-headed woodpeckers (*Melanerpes erythrocephalus*) were identified in the IPaC report as occurring and breeding in the project area. The bald eagle is known to breed year-round whereas the other species primarily nest during the late spring and summer months from April through August.

### State Protected Species

The Georgia Department of Natural Resources (GADNR) database of protected species for Tift County was accessed on December 29, 2021, which indicates state listed species or species of special concern that are known to occur within the same County as the Project Site. According to the results, eleven state listed species have potential to occur within Tift County. Each species and a description of its preferred habitat is provided in Table 3-1.

**Table 3-1 Georgia Department of Natural Resources - Wildlife Resources Division – State of Georgia Protected Plants and Animals within Tift County, Georgia**

Common Name	Scientific Name	Federal Status	State Status	Preferred Habitat Description
Eastern Indigo Snake	<i>Drymarchon couperi</i>	LT	T	Longleaf pine stands, such as sandhills and turkey oak scrub. Stump holes and gopher tortoise burrows; Floodplains or the edges of cypress ponds, either adjacent to or interspersed within the sandy uplands, are used during the warmer months.
Gopher Tortoise	<i>Gopherus polyphemus</i>	C	T	Longleaf pine and wiregrass community, which includes sandhills, dry flatwoods, and turkey oak scrub with open canopies that allow abundant sunlight.
Bald Eagle	<i>Haliaeetus leucocephalus</i>	-	T	Along the coast and near major rivers, wetlands, and reservoirs in the southern and central parts of the state. Like other members of the "fish eagle" group, bald eagles almost always nest near open water.
Suwannee Alligator Snapping Turtle	<i>Macrochelys suwanniensis</i>	-	T	Suwannee River Basin in Northern Florida and Southern Georgia.

Common Name	Scientific Name	Federal Status	State Status	Preferred Habitat Description
Monarch butterfly	<i>Danaus plexippus</i>	C	-	Trees adjacent to waterbodies including ponds, bayheads, flooded pastures, oxbow lakes, and ditches
Wild Coco	<i>Pteroglossaspis ecristata</i>	PT	T	Longleaf Pine sandhills and flatwoods, oak scrub, prairies, and disturbed openings in these habitats.
Parrot Pitcherplant	<i>Sarracenia psittacina</i>	-	T	Wet savannas, pitcherplant bogs
Purple Honeycomb Head	<i>Balduina atropurpurea</i>	-	R	Wet pine flatwoods and savannas, seepage slopes, pitcherplant bogs, and wet ditches through these habitats; often occurs with Yellow Honeycomb-head.
Carolina Bogmint	<i>Macbridea caroliniana</i>	-	R	Blackwater creek swamps and seepage bogs and streams in the Coastal Plain and Fall Line regions; Atlantic White Cedar swamps ("whitewater swamps") in the western Fall Line sandhills; wet roadside ditches through these habitats.
Silky Camellia	<i>Stewartia malacodendron</i>	-	R	Rich ravine and slope forests, often with Beech, Oak, Basswood, and Spruce Pine. Lower slopes of sandhills above bogs and creek swamps.
Solitary Beakrush	<i>Rhynchospora solitaria</i>	-	E	Wet, lower slopes of grassy, sunny hillside seeps and streamhead seepage bogs.
Rose Pitcherplant	<i>Sarracenia rosea</i>	-	E	Wet, open seepage bogs, savannas, wet pine flatwoods, wet ditches through these habitats.
Key: Statuses are LT= Listed Threatened, PT = Proposed Threatened, C=Candidate, T= Threatened, R= Rare, E= Endangered, GADNR 2021				

### 3.3.2 Environmental Consequences

#### 3.3.2.1 Proposed Action

##### *Vegetation*

Most of the Project Site and the surrounding areas have been previously disturbed from development activities associated with academic institutions, commercial and residential properties, and agriculture. Partial clearing of the approximately 0.6-acre stand of pine trees would occur as a result of the Proposed Action. Any areas of maintained lawn and existing landscaping cleared or disturbed during construction would be replaced with similar landscaping designs. Due to the limited vegetation currently present within the Project Site, impacts to vegetation resulting from implementation of the Proposed Action would be direct, long-term, and negligible.

##### *Wildlife*

The Project Site and surrounding areas are mostly development for academic institutions, commercial and residential properties, and large-scale agriculture. Due to the level of activity in the area and fragmentation of the pine tree stand within the parcel, nesting habitat for birds is marginal. Any other wildlife expected to

occur with the Project Site would be transient due to its developed nature. Due to the Project Site's developed landscape and lack of suitable habitat, impacts to wildlife are not anticipated.

### *Protected Species*

#### **Federally Protected Species**

There are no wetlands or other surface water features within the Project Site to support the federally protected Suwanee alligator snapping turtle. Additionally, there are no milkweed (*Asclepias* sp) communities to support the monarch butterfly. Further, gopher tortoises prefer specific soil types, ranging from best to moderate to marginal. The Project consists mostly of Tifton-Urban land complex soils. Although Tifton soils are considered a marginal soil for gopher tortoises, surrounding urban properties would not support this species. Lastly, longleaf pine stands and wire grass communities that typically support gopher tortoise and eastern indigo are not present within the developed site.

Several species of migratory birds are documented to occur and nest within the project area. No bald eagles or nests have been observed within the Project Site and due to the level of development of the site and surrounding area, would not be expected to occur. Tree clearing activities would occur in the fall and winter months to avoid nesting season to the extent possible. If tree clearing occurs during the summer, trees will be inspected for nests prior to clearing.

No listed species or critical habitat occur within or immediately outside of the Project Area. The Project as proposed will have no effect on federally protected species, therefore Section 7 consultation with the USFWS under the ESA is not anticipated. Per guidance provided by the Project-generated USFWS IPaC, if a no effect determination is determined by the action agency, no Section 7 consultation is required and concurrence with USFWS is not needed.

#### **State Protected Species**

There are no wetlands or other surface water features within the Project Site to support wetland or aquatic species including, the state protected Carolina bogmint, parrot pitcherplant, purple honeycomb head, solitary beakrush, and rose pitcherplant. Further, the limited area within the Project Site that is not developed is routinely maintained and does not provide habitat requirements that would support state rare and protected plants to include silky camellia and wild coco.

Due to the Project Site's developed landscape and lack of suitable habitat, impacts to federal and state rare, threatened, or endangered species are not anticipated. The Project will have no effect on federally protected species and Section 7 consultation with USFWS under the ESA is not required. In the event a federally



protected species is encountered work on the project will stop and USDA will engage USFWS for additional consultation.

### 3.3.2.2 No Action Alternative

Under the No Action Alternative, SEWRU and CGRBU would continue operating in existing facilities that are primarily outdated, inefficient, require frequent maintenance and repair, or are otherwise inadequate. Therefore, no impacts to biological resources would occur.

## 3.4 Water Resources

This section provides an overview of existing water resources in the Project Site, and the potential impacts on these water resources that would be associated with the No Action and Proposed Action Alternatives. Water resources discussed in this section include groundwater and surface water, including wetlands and floodplains.

### 3.4.1 Affected Environment

#### *Surface Water*

Surface waters are defined as water features that are on the Earth's surface, typically consisting of streams, lakes, ponds, and wetlands. Surface water features are further segregated into perennial, intermittent, and ephemeral. Perennial waters are permanent surface water features that have water present throughout the year. They typically exist as streams, rivers, lakes, springs, and swamps. Wetlands are those areas inundated by surface water or groundwater such that vegetation adapted to saturated soil conditions is prevalent. Examples include swamps, marshes, bogs, and wet meadows. Wetland habitat provides valuable public benefits including flood/erosion control, water quality improvement, wildlife habitat, and recreation opportunities.

Surface waters that meet certain physical and hydrologic criteria (defined bed and bank, ordinary high-water mark, or specific hydrologic, soil, and vegetation composition) as defined in the Clean Water Act (CWA) are considered Waters of the U.S. (WOTUS) (or jurisdictional waters) and are under the regulatory jurisdiction of USACE. The CWA is the primary federal law that regulates discharges of pollutants and/or fill materials into WOTUS as outlined in Sections 404 and 401. A jurisdictional determination by the USACE typically governs the activities affecting WOTUS.

The Project Site is within the U.S. Environmental Protection Agency (USEPA) South Atlantic Gulf Ecoregion (Level 4) and is within the Little River watershed [Hydrologic Unit Code (HUC) 03110204 (USGS 2022b). According to the USFWS National Wetlands Inventory (NWI), USGS's National Hydrography Dataset (NHD), and a site visit, there are no surface waters present within the Project Site.

The area is already developed and has a stormwater management system in place. The Project Site is between an unnamed tributary to the Little River approximately 0.25-mile to the west and the New River approximately 0.1-mile to the east. Neither the unnamed tributary to the Little River or the reach of the New River near the Project Site are listed on Georgia's 2020 integrated 305(b)/303(d) List of impaired streams (GAEPD 2020).

#### *Floodplains*

According to the Federal Emergency Management Agency's (FEMA) National Flood Hazard Layer Flood Insurance Rate Map (FIRM) (Firmette 13277C0107E), the Project Site is within Zone X which is considered an area of minimal flood hazard. There are no designated floodplains within the Project Site (FEMA 2010).

#### *Groundwater*

The Project Site is within the Floridan regional aquifer of the Southeastern Coastal Plain aquifer system which underlies the coastal plain of Alabama, Georgia, South Carolina and into Florida. Rocks in the Southeastern Coastal Plain aquifer system were deposited in fluvial, deltaic, and shallow-marine environments. Unlike the three other regional aquifer systems in the Southeastern Coastal Plain, the Floridan regional aquifer consists primarily of carbonate rocks and tends to be more permeable than the clastic rocks associated with the other regional aquifers. The confining units in this aquifer system are typically comprised silt and clay. Groundwater recharge enters the Southeastern Coastal Plain from precipitation (USGS 1990).

USDA-ARS sources its water from a local utility for all operational purposes including potable, laboratory, sanitary, fire suppression, and irrigation.

### **3.4.2 Environmental Consequences**

#### **3.4.2.1 Proposed Action**

##### *Surface Water*

Although there are no surface water bodies or wetlands within the proposed limits of disturbance (LOD) for the Project Site, there would be the potential for minor adverse impacts to surface waters resulting from runoff during construction. Construction activities associated with clearing of vegetation, disturbance of soils, and stockpiling of construction materials, would increase the potential for runoff and sedimentation downstream. The construction contractor is required by the CWA NPDES Stormwater Georgia General Construction Permit GAR100003 to prepare a Stormwater Pollution Prevention Plan prior to commencing construction. The plan would include stormwater BMPs that would reduce the potential for offsite impacts

to surface waters. Additionally, all temporarily disturbed areas would be graded and re-vegetated upon completion of construction, in accordance with a construction general permit for stormwater. Standard erosion and sediment control techniques to protect surface water resources would be applied, including silt fence, wattles, outlet protection, etc. Stormwater BMPs implemented would be designed in accordance with Georgia Soil and Water Conservation Commission's (GSWCC) 2016 Manual for Erosion and Sediment Control in Georgia. Any potential temporary adverse impacts resulting from construction would be addressed through the required federal and state permitting process as briefly summarized in Section 1.5.

Additionally, USDA-ARS proposes to construct a new 7,400 square foot stormwater pond onsite to offset impacts from the additional impervious surface, which would provide a long-term, beneficial impact to stormwater management onsite.

#### *Groundwater*

During construction, hazardous materials would be on-site that could potentially contaminate groundwater resources, including petroleum products for fuel and lubrication of construction equipment, hydraulic fluids, and a variety of other chemicals commonly used for general construction projects. Implementation of BMPs would minimize potential for leaks or spills from construction equipment and outline procedures and protocols to quickly address potential spills that may occur.

Water necessary for construction would be provided from existing utility provider or water delivery trucks. The construction contractor would use water for the purposes of fugitive dust mitigation (during dry conditions) as needed, concrete mixtures, and other temporary construction needs. Construction activities requiring water would primarily be for dust control and compaction during grading activities for roads, parking areas, and foundations for structures. Construction of the foundation, stormwater features, and utilities would not require deep soils excavations that would possibly affect shallow groundwater. Water usage at the newly constructed and renovated buildings would be comparable to current usage, and because water conservation measures required under Executive Order (EO) 13834, *Efficient Federal Operations*, would be met, no adverse impacts to groundwater and water supply sources are expected to occur.





### 3.4.2.2 No Action Alternative

Under the No Action Alternative, SEWRU and CGRBU would continue operating in existing facilities that are primarily outdated, inefficient, require frequent maintenance and repair, or are otherwise inadequate. Under the No Action Alternative, no impacts would occur to surface waters or groundwater and operation would continue as it currently does.

## 3.5 Air Quality, Greenhouse Gases, and Climate Change

This section describes existing air quality and Greenhouse Gas (GHG) emissions in the project region and the potential impacts on air quality and GHG emissions that would be associated with the No Action and Proposed Action Alternatives.

### 3.5.1 Affected Environment

#### *Air Quality*

Ambient air quality is determined by the type and concentration of pollutants emitted into the atmosphere, the size and topography of the air shed in question, and the prevailing meteorological conditions in that air shed. With the issuance of the Clean Air Act of 1970, as amended, Congress mandated the protection and enhancement of our nation's air quality. USEPA established the National Ambient Air Quality Standards (NAAQS) for the following criteria pollutants to protect public health and welfare: sulfur dioxide (SO<sub>2</sub>), ozone, nitrogen dioxide, particulate matter whose particles are less than or equal to 10 micrometers (PM<sub>10</sub>), particulate matter whose particles are less than or equal to 2.5 micrometers (PM<sub>2.5</sub>), carbon monoxide (CO), and lead.

Primary NAAQS were developed in order to protect public health and safety and public welfare (e.g., visibility, crops, forests, soils, and materials) from known or potential adverse effects of air pollutants. Areas in compliance with the NAAQS are designated "attainment" areas. Areas not in compliance with the NAAQS are designated as "nonattainment" areas. New sources proposed in or near nonattainment areas may require more stringent air permitting requirements.

The area where the Project Site is located is in the city of Tifton within Tift County, which is slightly more developed than the surrounding rural-residential and agricultural uses outside the city center. Tift County is considered in attainment for all pollutants (USEPA 2021a).

Table 3-2 presents the most recent (2017) USEPA emission inventory data (USEPA 2021d) for the most prevalent NAAQS pollutants for Tift County. These data represent anthropogenic emissions from all stationary source and mobile source activities. All values fall beneath the USEPA thresholds for NAAQS pollutants.



**Table 3-2 Average Emissions of NAAQS Pollutants in Tift County**

<b>Pollutant</b>	<b>Emissions for Tift County (tons per year)</b>
Carbon Monoxide	12,452
Nitrogen Oxides (NO <sub>x</sub> )	1,975
PM <sub>10</sub>	4,659
PM <sub>2.5</sub>	1,341
SO <sub>2</sub>	26
Volatile Organic Compounds (VOCs)	5,117

Source: EPA 2021d

### *Greenhouse Gases*

Greenhouse Gases typically consist of natural and man-made compounds that are released into the earth's atmosphere. GHGs also absorb a portion of Earth's infrared radiation and can re-emit some of the radiation back to the earth's surface. When radiation is emitted back to the earth's surface, temperatures are typically warmer than they would naturally be. With that process, GHGs act as insulation and contribute to the maintenance of global temperatures. Increasing levels of GHGs in the atmosphere result in an increase in temperature on earth, commonly known as global warming or climate change. Changes in climate associated with global warming produce adverse economic and social consequences globally through changes in weather (e.g., more intense natural disasters, greater risk for forest fires, flooding) (USGCRP 2018).

The primary GHG emitted by human activities in the U.S. is carbon dioxide (other than water vapor), representing approximately 82 percent of total GHG emissions in the US (USEPA 2022b). Dominant sources of carbon dioxide and of overall GHG emissions is fossil fuel combustion. Emissions of the GHG methane, which have declined in the U.S. from levels in 1990, are primarily a result of digestion of domestic livestock, decomposition materials in landfills, coal mining, and natural gas leaks. Agricultural soil management is the major source of the GHG nitrous oxide emissions in the United States, representing approximately 74 percent of its emissions from human activities (USEPA 2022a).

Currently, there are two primary GHG regulations for stationary emission source:

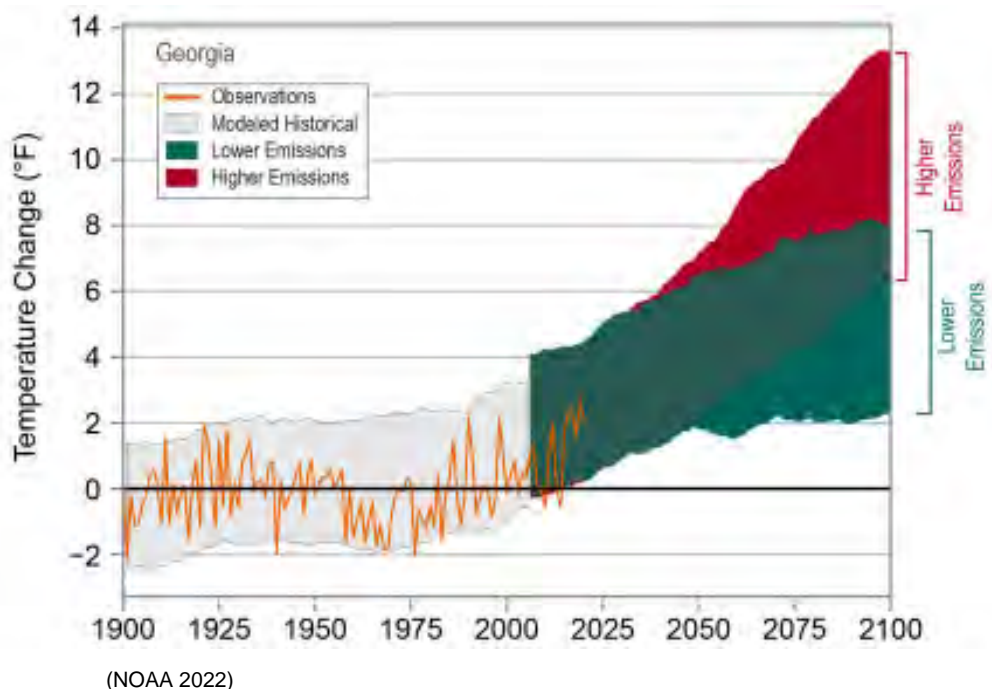
- 40 CFR Part 98 - requires annual GHG emissions reporting and applies to fossil fuel suppliers and industrial gas suppliers, facilities that inject CO<sub>2</sub> underground for sequestration or other reasons, direct

GHG emitters, and manufacturers of heavy-duty and off-road vehicles and engines. The rule does not require control of GHGs, it requires only that certain sources emitting 25,000 metric tons CO<sub>2</sub>e or more per year monitor and report emissions.

- 40 CFR Parts 51, 52, 60, 70 and 71 – establishes CO<sub>2</sub> emission limits to be addressed in Prevention of Significant Deterioration (PSD) and Title V permits required for electric utility generating units that are major stationary sources for regulated pollutants other than GHG. A 75,000 tons per year (tpy) threshold is used by EPA as a de minimis value to determine whether a PSD permit must include an emission limitation for CO<sub>2</sub> and a 100,000 tpy threshold is applied for Title V permits.
- GHG emissions from operation of the Project will be below all applicable thresholds and it will not be subject to any of these regulations.

#### *Climate Change – Regional Climate*

The Project Site is located approximately 160 miles south of Georgia's state capital of Atlanta. The region experiences a humid subtropical climate with temperate winters and long hot summers. Average annual high and low temperatures for Tifton, Georgia are 77- and 54-degrees Fahrenheit, respectively. Normal annual precipitation at the Project Site is approximately 47.3 inches (U.S. Climate Data, 2022). As shown in Figure 3-2, for the State of Georgia, NOAA modeling predicts higher temperatures over the next 100 years depending on current and future GHG emissions. Modeled historical temperatures over the last 40 years do not show a noticeable upward trend in temperature.

**Figure 3-2 Observed and Projected Temperature Change in Georgia**

### 3.5.2 Environmental Consequences

#### 3.5.2.1 Proposed Action

##### *Air Quality*

The majority of potential air quality impacts associated with the Proposed Action would occur during construction. Construction activities would result in emissions from the operation of construction equipment, contracted employees' personal vehicles, and fugitive dust suspension from demolition, clearing, grading, and other activities across exposed dry soil. Approximately 95 percent (by weight) of fugitive emissions from vehicular traffic over paved and unpaved roads would be composed mainly of particles that would be deposited near the roadways routes taken to reach the Project Site. As necessary, fugitive dust emissions from construction areas and paved and unpaved roads would be mitigated using wet suppression if needed. Tree debris from clearing would be removed by chipping and grinding, or hauled from the site. No burning of tree debris will occur during construction. Direct impacts to air quality associated with construction activities would be temporary and minor. Small amounts of operational air emissions will occur from vehicle traffic around the labs, fugitive emissions from lab exhaust, operation of one additional diesel-fired back-up generator during testing and/or emergencies, and four new drying barns powered by natural gas. Based on the expected quantities of operational emissions, it was determined that no air permits would be required for the project. All applicable air quality rules will be followed. No long-term operational air impacts are expected.



*Greenhouse Gases*

The use of construction equipment would cause a minor temporary increase in GHG emissions during construction activities. Combustion of gasoline and diesel fuels by internal combustion engines (trucks and off-road vehicles) at the site would generate emissions of CO<sub>2</sub> and very small amounts of other GHGs such as methane and nitrous oxide. These GHG emissions would be short-term during the construction period and are expected to be very small in comparison to other large sources of GHG in the area (such as fossil fuel power plants or emissions from the entire transportation sector). Additional GHG emissions would occur due to transporting materials and construction workers to the Project Site, and GHGs would be emitted in the US or globally for production and transportation of the materials used for construction. The total amount of these emissions associated with construction would be small and would result in negligible air quality impacts overall.

Operation of the project facilities will result in GHG emissions generated from electricity usage. However, the buildings constructed as part of the project will be more energy efficient than the older buildings that will be used previously, and a net increase in GHG emissions is not expected due to this increased efficiency. Operation of the project will move some workers from other parts of campus into the new Facility but will not increase the number of workers and therefore will not increase the number of worker vehicle trips. Therefore, no GHG emissions increase is expected due to worker travel. Overall, impacts of GHG emissions from operation of the project is expected to be negligible.

*Climate Change*

No noticeable direct or indirect impacts to the regional climate would occur as a result of the Proposed Action. GHG emissions from the construction and operation of the project are expected to be very small and in turn will have a negligible impact on climate change in the project area. The project would not significantly change the surface characteristics of the Project Site, nor it would have effect on soil permeability and hydrologic characteristics of the developed area. Therefore, average temperatures of the developed area are not expected to change due to the Proposed Action.

**3.5.2.2 No Action Alternative**

Under the No Action Alternative, the Proposed Action would not occur. SEWRU and CGRBU would continue operating in existing facilities that are primarily outdated, inefficient, require frequent maintenance and repair, or are otherwise inadequate. Therefore, no air emissions or GHGs would be generated by equipment or vehicles from construction or operation of the Proposed Action. Emissions, GHGs, and effects to climate change, would remain the same.

### **3.6 Hazardous and Toxic Substances and Waste Management**

This section provides an overview of existing waste management within the surrounding area of the Project Site and the potential impacts to waste management that would be associated with the No Action or Proposed Action Alternatives. Components of waste management that are analyzed include solid and hazardous waste and materials.

#### **3.6.1 Affected Environment**

“Hazardous materials” and “hazardous waste” are substances which, because of their quantity, concentration, or characteristics (physical, chemical, or infectious), may present a significant danger to public health and/or the environment if released. These substances are defined by the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA; 42 U.S.C. §§ 9601 et seq.) and the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act ([RCRA]; 42 U.S.C. §§ 6901 et seq.). Regulated hazardous wastes under RCRA include any solid, liquid, contained gaseous, or semisolid waste or combination of wastes that exhibit one or more of the hazardous characteristics of ignitability, corrosivity, toxicity, or reactivity, or is listed as a hazardous waste under 40 CFR part 261. Storage and use of hazardous materials and wastes are regulated by local, state, and federal guidance including the Emergency Planning and Community Right-to-Know Act (42 U.S.C. §§ 116 et seq.) and RCRA.

A Phase I Environmental Site Assessment (ESA) was conducted by the USACE on September 29, 2020, to evaluate the current environmental condition of the Project Site with respect to items such as underground storage tanks (USTs), above ground storage tanks (ASTs), hazardous or regulated materials, or other visual indications of environmental conditions that could affect the Project Site.

According to the Phase I ESA inspection report, potentially hazardous materials identified on-site were transformers that may potentially contain poly-chlorinated biphenyls (PCBs), paints varnishes, petroleum products, acids, and solvents located in laboratories, workshop, outdoor storage units, or waste collection vessels, and additional unidentified substance containers. Asbestos sampling was previously conducted for Building 001 and no asbestos-containing material (ACM) was identified. Lead based paint sampling was not conducted during the Phase I ESA and no previous surveys were identified. Lead based paint may be present given the age of some of the buildings. Visual inspection for pesticides and herbicide was completed during the Phase I ESA. Material containing pesticides or herbicides were identified during the inspection in several areas, primarily the cold storage building or pesticide storage building (Building 68 and Building 57). Specifically, building 57 houses a sink dedicated for mixing pesticides. The pesticide

mixing sink drains to a concrete sump and effluent is pumped into an above ground storage tank (AST) located adjacent to the sump (USACE 2020).

### **3.6.2 Environmental Consequences**

#### **3.6.2.1 Proposed Action**

Design objectives for the consolidation and modernization of the USDA building include, providing service access to utility systems and receiving areas without the need to enter sensitive or hazardous areas. Wet laboratories utilizing hazardous chemicals or biohazardous agents require one-pass (100% exhaust) air supply. They will be grouped separately within the lab zone from instrument rooms, equipment rooms, and other laboratory support areas that can be safely supplied with recirculated air.

Storage facilities are required for chemicals, pesticides, fertilizer, and other hazardous and flammable material. These areas will be housed in separate structures compliant with occupational safety and building codes. Chemical and pesticide storage facilities currently located on USDA property may be retained. A hazardous waste materials storage room is proposed within the lab/office building for collecting waste from laboratories prior to removal by a service contractor and is not intended to house waste for extended periods. This waste is not anticipated to require special fire protection features other than a fire resistance-rated enclosure. Minor, long-term beneficial impacts would occur as the modernization of storage areas would better manage hazardous materials that are maintained on-site.

Any potentially PCB containing transformers and panels that are to be removed as a part of demolition activities will be handled and disposed of in an appropriate manner. Any materials such as paints, varnishes, petroleum products, acids, and solvents will be removed and stored in a manner in which they do not pose a spill risk prior to the demolition of any structures. Additionally, sampling, and subsequent remediation for any lead based paint will be conducted prior to or as a part of demolition in building constructed prior to dates in which those materials were used. Demolition activities will be conducted by a contractor licensed to handle and properly dispose of these hazardous materials.

#### **3.6.2.2 No Action Alternative**

Under the No Action Alternative, SEWRU and CGRBU would continue operating in existing facilities that are primarily outdated, inefficient, require frequent maintenance and repair, or are otherwise inadequate. Although the site is outdated, it is currently in compliance with hazardous waste storage regulations. No changes in the storage of hazardous materials would occur under the No Action Alternative; and the site would continue operations under its current hazardous waste management plan. No project related impacts

to waste management resources would occur. Existing waste management conditions would be expected to remain as they are at present.

### 3.7 Noise

This section provides an overview of existing noise within the surrounding area of the Project Site and the potential impacts to noise that would be associated with the No Action or Proposed Action Alternatives.

#### 3.7.1 Affected Environment

The magnitude and frequency of environmental noise may vary considerably over the course of the day, throughout the week, and across seasons, in part due to changing weather conditions and the effects of seasonal vegetation cover. Two measures that relate the time-varying quality of environmental noise to its known effect to people are the 24-hour equivalent sound level ( $L_{eq}$ ) and day-night sound level ( $L_{dn}$ ). The  $L_{eq}$  is the level of steady sound with the same total (equivalent) energy as the time-varying sound of interest, averaged over a 24-hour period. The  $L_{dn}$  is the  $L_{eq}$  plus 10 dBA added to account for people's greater sensitivity to nighttime sound levels (typically considered between the hours of 10:00 p.m. and 7:00 a.m.). The A-weighted scale is used to assess noise impacts because human hearing is less sensitive to low and high frequencies than mid-range frequencies. The human ear's threshold of perception for noise change is considered 3 A-weighted decibels (dBA); 6 dBA is clearly noticeable to the human ear, and 10 dBA is perceived as a doubling of noise (or halving, if the noise is decreasing).

In 1974, the EPA published *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 on public health and welfare (USEPA 1974). In this document, the EPA indicated that a  $L_{dn}$  of 55 dBA is the noise threshold that would prevent outdoor activity interference or annoyance from continuous noise. We have adopted this criterion and use it to evaluate potential noise impacts from USDA projects at noise sensitive areas (NSAs) such as residences, schools, or hospitals. A  $L_{dn}$  of 55 dBA is equivalent to a continuous sound level of 48.6 dBA for facilities that generate constant sound levels. A list of typical sound levels for common sound sources is presented in the table below.

**Table 3-3 Typical Sound Pressure Levels Associated with Common Sound Sources**

Sound Pressure Level (dBA)	Subjective Evaluation	Environment	
		Outdoor	Indoor
140	Deafening	Jet aircraft at 75 feet	--
130	Threshold of pain	Jet aircraft during takeoff at a distance of 300 feet	--
120	Threshold of feeling	Elevated train	Hard rock band

Sound Pressure Level (dBA)	Subjective Evaluation	Environment	
		Outdoor	Indoor
110	--	Jet flyover at 1,000 feet	Inside propeller plane
100	Very loud	Power mower, motorcycle at 25 feet, auto horn at 10 feet, crowd sound at football game	--
90	--	Propeller plane flyover at 1,000 feet, noisy urban street	Full symphony or band, food blender, noisy factory
80	Moderately loud	Diesel truck (40 miles per hour) at 50 feet	Inside auto at high speed, garbage disposal, dishwasher
70	Loud	B-757 cabin during flight	Close conversation, vacuum cleaner
60	Moderate	Air-conditioner condenser at 15 feet, near highway traffic	General office
50	Quiet	--	Private office
40	--	Farm field with light breeze, birdcalls	Soft stereo music in residence
30	Very quiet	Quiet residential neighborhood	Inside average residence (without TV and stereo)
20	--	Rustling leaves	Quiet theater, whisper
10	Just audible	--	Human breathing
0	Threshold of hearing	--	--
Sources: Egan, 1988; Ramsey and Sleeper, 1994			

### 3.7.2 Environmental Consequences

#### 3.7.2.1 Proposed Action

Under the Proposed Action, minor adverse impacts may occur during the construction. Impacts would include temporary increases in noise resulting from heavy equipment and machinery that could potentially affect sensitive receptors during the construction phase. When the proposed demolition, renovation, and construction phases are complete, noise associated with those activities would end. Therefore, only short-term minor adverse impacts from noise to the environment of the Project Site would be expected during the construction phase. No long-term adverse impacts are expected during operation of the updated or new facilities.

The current USDA-ARS campus is located within the developed city of Tifton, GA. The nearest potentially sensitive noise receptors are the UGA campus that surround the Project Site to the north, south and southwest. The nearest residential properties are single-family residences which are approximately 0.3-mile to the southeast on the other side of Interstate 75. It is unlikely the residences on the other side of the

highway will experience any increase in noise during construction due to the distance from the project and the proximity to the interstate. To minimize potential impacts to sensitive receptors from noise, construction would be conducted during standard daylight working hours on weekdays. Post-construction noise levels would be consistent with current operations of the facility. Noise associated with current and future facility operations includes, staff noise, traffic during commuting hours, and general operational noise associated with heating and cooling units and maintenance activities such as lawn care. The noise from current operational activities is negligible and similar to noise levels associated with the surrounding land use. There would be no increase in the operational noise activities resulting from implementation of the Proposed Action.

### 3.7.2.2 No Action Alternative

Under the No Action Alternative, there would be no changes to the local noise environment. Under the No Action Alternative, SEWRU and CGRBU would continue operating in existing facilities that are primarily outdated, inefficient, require frequent maintenance and repair, or are otherwise inadequate. Building 001 would remain unimproved, the new laboratory and support buildings would not be constructed, demolition activities would not occur, and roadway and parking realignment would not occur, resulting in no increase or decrease in noise levels.

## 3.8 Cultural Resources

NEPA requires consideration of important historic and cultural, and natural aspects of our national heritage. Important aspects of our national heritage that may be present in the Project Site must also be considered under Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, and the implementing regulations, 36 CFR 800. This act requires Federal agencies to consider the effect an undertaking would have on historic properties. Section 106 defines historic properties as any prehistoric or historic-age district, site, building, structure, or object included in or eligible for inclusion in the National Register of Historic Places (NRHP). The Federal agency must involve the State Historic Preservation Office (SHPO) and other consulting parties in the Section 106 process.

The NHPA mandates that agencies perform the following actions:

- Initiate the Section 106 process through agency coordination with the SHPO and/or Tribal Historic Preservation Offices (THPO). The agency should also plan to involve the public and to identify other potential consulting parties. For this project, coordination was initiated with the Georgia Historic Preservation Division (HPD), who serves as the SHPO for the State of Georgia. USDA-ARS also identified tribes and other potential consulting parties and initiated coordination as required in fulfillment of Section 106 obligations. Copies of relevant correspondence are included in Appendix B.
- Identify historic properties that may be affected by the Project, including those either listed in the NRHP or determined through a consensus process to be eligible for listing in the NRHP. The Project Site was determined to comprise a district eligible for NRHP inclusion.
- Assess adverse effects to historic properties including the nature and extent of the expected effects on the qualities of the property that resulted in its listing in the NRHP or the determination that it is eligible for listing in the NRHP. Per consultation with the HPD, the project as proposed was determined to constitute an adverse effect to the historic (NRHP-eligible) property.
- Resolve adverse effects by considering measures to avoid, minimize, or mitigate those effects. A Memorandum of Agreement (MOA) was developed outlining appropriate mitigation stipulations. A copy of the document is included in Appendix B.

### **3.8.1 Affected Environment**

To identify new or previously recorded cultural resources eligible for listing on the NRHP, cultural resources background review, archival research, and documentation efforts were conducted within a specified Area of Potential Effects (APE). The APE is defined as the geographic area within which the Project may directly or indirectly cause changes to the character or use of cultural resources. The APE for the Project was defined as the limits of the associated 5.25-acre Project Site. The cultural resources analysis included an NRHP eligibility and effects assessment for the Project Site and an assessment of the potential for archaeological impacts in association with the proposed undertaking.

#### *Records Search*

Cultural resources specialists reviewed materials relevant to the APE and a 1-mile Study Area including archaeological site files and previous surveys from UGA's Georgia Archaeological Site File (GASF), historic resources (NRHP-listed and previously surveyed) included on Georgia's Natural, Archaeological,

and Historic Resources Geographic Information System (GIS) (GNAHRGIS), and sources detailing the history of the UGA Tifton campus and its agricultural research mission. Review of UGA's GASF data identified one archaeological site, 9TI63, within a 1-mile Study Area. The site is a historic artifact scatter associated with a former barn located on the UGA Coastal Plain Experiment Station. Site 9TI63 was recommended ineligible for NRHP inclusion on the site form provided by GASF. It is not within the Project Boundary and would not be impacted by the proposed undertaking. Additionally, ten archaeological surveys have been previously conducted within the 1-mile Study Area, but none intersect the APE (Table 3-4). No archaeological sites or previously recorded cultural resources are reported within the APE.

There are a number of previously-recorded, historic-age, non-archaeological resources within the 1-mile Study Area; however, no individual resources are located in immediate proximity to the APE. Review of the of the 2019 *University of Georgia Historic Preservation Master Plan* (Georgia Master Plan) (Wiss, Janney, Elstner Associates, Inc. et al. 2019) indicates the Project Site (APE) is within the boundaries of an NRHP-eligible historic district comprising the entire UGA Tifton Campus, also known as UGA's Coastal Plain Experiment Station. Though within the district's boundaries, the subject buildings were not specifically assessed for NRHP eligibility or identified as contributing resources to the UGA Tifton Campus historic district during development of the Georgia Master Plan due to their ownership by the Federal government. The historic district was identified as significant at the state level in the areas of Agriculture, Architecture, Education, Invention, and Science (Wiss, Janney, Elstner Associates, Inc. et al. 2019).



**Table 3-4 Previous Archaeological Surveys within 1 mile**

<b>GASF ID</b>	<b>Year</b>	<b>Consultant</b>	<b>Sponsor</b>	<b>Project</b>
-	2012	New South Associates	-	Phase I Archaeological Survey of the UGA Tifton Building 4672
2553	2002	Southwind Archaeological Enterprises	GDOT	Carpenter Road Improvements
3092	2003	Southwind Archaeological Enterprises	GDOT	Carpenter Road Improvements Addendum
8124	2014	GDOT	GDOT	1-75 Interchange Reconstruction at CR410/Brighton Road
8146	2012	Edwards-Pitman Environmental, Inc.	GDOT	Carpenter Road Improvements Addendum
9648	2007	GDOT	GDOT	SR 7 Resurfacing
10157	2003	GDOT	GDOT	Grading US 41/SR 7 at the SR 401/I-75 Southbound Entrance Ramp
10180	2017	Southeastern Archaeological Services, Inc.	UGA	University of Georgia; Tifton Campus Outparcel #5
10240	1985	GDOT	GDOT	I-75 Widening
11819	1983	GDOT	GDOT	Eight Street Widening
13301	1977	GDOT	GDOT	Central Street Widening

Source: GASF 2021

GDOT – Georgia Department of Transportation

UGA – University of Georgia

### *Cultural Resource Assessment Results*

The constituent buildings associated with the Project Site were photographed and assessed for NRHP-eligibility by a Secretary of the Interior (SOI)-qualified architectural historian. Though none of the buildings appear to qualify for individual NRHP listing, due to their associations with defined historic contexts and agricultural research endeavors and their overall aesthetic similarity to contributing features of the adjacent NRHP-eligible UGA Tifton Historic District, the permanent and recognizable historic-age components of the Project Site (B001, B002, B003, B004, B007, B008, B013, and B015) are recommended for NRHP inclusion as contributing resources to the district. These resources are significant under Criterion A in the areas of agriculture and education and under Criterion C as examples of purpose-driven, research-related architecture, more significant for their form, function, and place within the larger campus landscape than for their individual design or stylistic qualities. Two additional historic-age resources, B089 and B093, are temporary prefabricated metal storage containers constructed between the 1970s and 1980s. They are not permanent or fixed parts of the landscape and were intended to be disposed of or relocated once their useful

life expired. As a result, they are not recommended as contributing features of the recommended NRHP-eligible campus.

An SOI-qualified archaeologist conducted a desktop analysis of the project's potential to impact significant archaeological resources. The review included archaeological site files and previous surveys from UGA's GASF, the Soil Web supplied by the Natural Resources Conservation Service, and historic-age maps and aerials provided by the U.S. Geological Survey (USGS) Historic Topographic Map Explorer and the UGA online Galileo Library. These sources were examined to assess the potential for previously unrecorded cultural resources within areas potentially subject to ground disturbing activities. These sources, along with a review of a recent topographic survey of the campus and photographs taken during documentation of the buildings, demonstrated the forested portion of the APE proposed for ground disturbing activities was once cleared and cultivated and now contains a sidewalk, a buried communications line, and an overhead electric line. Review of historic period maps and aerial photographs suggest the APE has low potential for historic-age archaeological resources pre-dating the construction of the Project Site and that previous disturbances limit potential for intact prehistoric archaeological deposits. Because of the documented previous disturbances, an archaeological survey is not recommended.

A memorandum summarizing the results of the NRHP eligibility assessment for the buildings and the archaeological recommendations was submitted to the SHPO on January 14, 2022. The SHPO concurred that the Project Site is eligible for NRHP inclusion and that no archaeological survey is required prior to project implementation.

### **3.8.2 Environmental Consequences**

#### **3.8.2.1 Proposed Action**

Physical effects are proposed to three historic-age components of the Project Site, including one contributing resource (B001) and two non-contributing (B089 and B093) resources. All improvements to B001 would be interior, with the exception of the replacement of a 1980s vintage HVAC system.

Other elements of the Project requiring consideration under Section 106 include: Realignment of the north-south roadway transecting the Project Site and construction of a new entrance, construction of new three-story laboratory building with connector to B001 and an associated two-story support building, and construction of new parking areas east of B001 and north of the proposed support building.

Based on the information provided, HPD indicated that the project, as currently proposed, constitutes an **adverse effect** to historic properties that are eligible for or listed in the NRHP, as defined in 36 CFR Part

800.5(a)(2). The scale and massing of the new construction, the alteration of exterior circulation spaces, including both automobile and pedestrian, away from the historic buildings and established hierarchy of spaces, and the alteration of the historic buildings' relationship to the setting and landscape is not consistent with the Secretary of the Interior's *Standards for the Treatment of Historic Properties*. A copy of HPD's February 14, 2022 letter is included in Appendix B.

To account for adverse effects to the NRHP-eligible Project Site, USDA-ARS is preparing a MOA outlining avoidance, minimization, and mitigation commitments for the proposed undertaking. In accordance with 36 CFR § 800.6(a)(1), USDA-ARS notified the Advisory Council on Historic Preservation (ACHP) of its adverse effect determination with specified documentation, and the ACHP declined to participate on June 7, 2022 (Appendix B).

The USDA-ARS also determined the following Federally-recognized Indian tribes may have interest in the undertaking and invited them to participate in Section 106 consultation in letters dated March 29, 2022: Alabama – Quassarte Tribal Town, Coushatta Tribe of Louisiana, Kialegee Tribal Town, Muscogee (Creek) Nation, Poarch Band of Creek Indians, Seminole Nation of Oklahoma, and Thlopthlocco Tribal Town. None of the tribes invited to participate in Section 106 consultation responded to the request (Appendix B).

USDA-ARS also invited additional potential consulting parties to participate in Section 106 consultation including: the Southern Georgia Regional Commission, the Tift County Board of Commissioners, the Tifton Community Development Department, the Tifton Historical Preservation Commission, and the University of Georgia in letters dated March 29, 2022. The University of Georgia accepted the invitation and participated in the consultation regarding the effects of the undertaking on historic properties in a consulting parties meeting held on June 24, 2022 (Appendix B).

Through consultation, USDA-ARS agreed to implement the following stipulations to account for adverse effects to the contributing resources and the district as a whole:

*Photographic Permanent Archival Record (PAR)*

The USDA-ARS or its consultant will prepare Archival Photographs Recordation/Permanent Archival Record (PAR) for the Tifton Campus. Prior to project implementation, an SOI-qualified architectural historian will document the resource via digital photography of contributing buildings and structures within the USDA-ARS Tifton Campus. The photographs will include exterior views of all buildings, interior views of areas subject to rehabilitation in the main laboratory building (B001), and setting views of the overall complex. The photographer shall comply with the minimum level standards necessary for document retention at SHPO pursuant to the *Guidelines for Establishing a Photographic Permanent Archival Record*.

A draft copy of the PAR will be provided to SHPO and Consulting Parties for a 30-day review and comment period. USDA-ARS or its assignee, will respond to SHPO comments regarding the draft PAR within 30-days of receipt. After the draft has been reviewed, a final archival copy of the PAR will be provided to SHPO and to the University of Georgia at Tifton Library.

#### *Development of Interpretive Panel for Installation in New Laboratory Building*

As part of design efforts for the proposed three-story laboratory building to be constructed on the campus, USDA-ARS or its consultant will develop an interpretive wall panel for installation in the entry area of the new building. The panel will contain historical information about the Tifton Campus and its significance, as well as photographs and other illustrations as relevant. The content of the panel, including its size and positioning, will be provided in draft form to the SHPO and Consulting Parties. Their input will be taken into account prior to fabrication and installation of the panel. The panel will be installed within six months of completion of the new laboratory building and documentation that it was installed will be provided to SHPO.

### **3.8.2.2 No Action Alternative**

Under the No Action Alternative, there would be no changes to existing infrastructure of buildings. No impacts would occur. Building 001 would remain unimproved, the new laboratory and support buildings would not be constructed, demolition activities would not occur, and roadway and parking realignment would not occur, resulting in no further modifications or demolitions to the existing buildings.

## **3.9 Socioeconomics**

Socioeconomic factors are defined by the interaction or combination of social and economic factors.

The relevant factors related to the Project Site include population, employment, environmental justice, and protection of children.

### **3.9.1 Affected Environment**

#### *Population and Employment*

The Project Site is within the City of Tifton, Georgia and adjacent the UGA Tifton Campus. According to the United States Census the estimated population of the City of Tifton is around 16,838 and median household income is \$38,316 (U.S. Census Bureau, 2019). The City of Tifton makes up almost half of the county's population with Tift County's estimated population being 40,644 and median household income of \$45,639 (U.S. Census Bureau, 2019). Georgia has an estimated population of 10,617,423, and a median household income of \$58,700 (U.S. Census Bureau, 2019).

The Project Site employs approximately 69 people (USDA-ARS, 2021). The team consists of location support staff (10 people), SEWRU staff (35 people), and the CGBRU staff (24 people).

Table 3-5 provides a summary of selected demographic and socioeconomic statistics and illustrates the range of population densities in the city, county, and state in the vicinity of the Project Site.

**Table 3-5 Existing Population and Demographic Conditions**

Demographic	Tifton, GA	Tift County, GA	Georgia
2019 Population Estimate	16,838	40,644	10,617,423
2010 Population Density (persons per square mile)	1,309	154.9	168.4
Population Change Since 2010 (percent)	2.6	1.3	9.6
Persons per household, 2015-2019 Estimate	2.48	2.54	2.7
2019 Estimate: White Individuals, not Hispanic or Latino (percent)	52.1	55.1	52
2019 Estimate: Black, or African American Individuals (percent)	32	30.7	32.6
2019 Estimate: American Indian and Alaska Native Individuals (percent)	0	0.5	0.5
2019 Estimate: Asian Individuals (percent)	2.7	1.5	4.4
2019 Estimate: Individuals of Hispanic or Latino Origin (percent)	12.1	12.2	9.9
Source: U.S. Census Bureau, 2019			

Table 3-6 provides information on the economy and employment in the Project Site.

**Table 3-6 Existing Income and Employment conditions in the Project Site**

Income Characteristic	Tifton, GA	Tift County, GA	Georgia
2019 Estimate: Per Capita Income (dollars)	19,775	22,974	31,067
2019 Estimate: Population Below Poverty Level (percent)	35	21.5	13.3
2019 Estimate: Civilian Labor Force (percent)	57.2	60.3	62.6
Most Recent Estimate: Unemployment Rate (percent)	2.3 <sup>2</sup>	3.43	4.1 <sup>4</sup>
Major Industry	R <sup>2</sup>	R <sup>2</sup>	M <sup>1</sup>
Sources:			
(1) U.S. Census Bureau, 2019.			
(2) Tifton, Georgia Population 2021, 2021.			
(3) Unemployment Rate in Tift County, GA, 2021.			
(4) Unemployment Rate in Georgia, 2021.			
<sup>1</sup> Manufacturing (M)			
<sup>2</sup> Retail (R)			

Table 3-7 shows minority and income information for the state, counties, and census blockgroups within a 1-mile radius of the Project Site.

**Table 3-7 Minority Populations and Low-Income Population Information for the Census Block Groups Within 1 Mile of the Project**

State / County / Census Tract	Percent Minority <sup>1</sup>	Percent Low Income	Population
State of Georgia	48	13.3	10,617,423
Tift County	44.9	21.5	40,644
Block Group ID 132669603003	26	34	3,753
Block Group ID 132779607002	40	31	1,921
Block Group ID 132779603002	43	29	857
Block Group ID 132779603006	32	29	436
Block Group ID 132779603005	10	42	94168
Sources: (1) U.S. Census Bureau, 2019. Includes population that identifies as other than “non-Hispanic white alone.” (2) USEPA, EJSCREEN Mapping Tool, 2022c.			

#### *Environmental Justice and Protection of Children*

Environmental justice evaluates the race, ethnicity, and poverty status of populations within the Region of Influence (ROI). The ROI for socioeconomic characteristics encompasses Tift County, Georgia. This ROI includes the Project Site and the immediately surrounding communities that have direct and indirect socioeconomic relationships with the campus. On February 11, 1994, EO 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, was issued to focus the attention of federal agencies on the human health and environmental conditions in minority and low-income communities. Environmental justice analyses are performed to identify potential disproportionate adverse effects from proposed actions and to identify alternatives that might mitigate these effects.

Minorities are identified as people who classified themselves as American Indian or Alaskan Native; Asian or Pacific Islander; African Americans or Black, not of Hispanic origin; or Hispanic. Minority populations are defined as areas where racial minorities comprise 50 percent or more of the total population (CEQ, 2016). The Council for Environmental Quality (CEQ) guidance does not establish a threshold for low-income communities, therefore, a low-income population is one with at least 25 percent or greater of its population living in poverty for the purposes of this EA (USEPA 2022c).

On April 21, 1997, EO 13045, *Protection of Children from Environmental Health Risks and Safety Risks*, was issued which directs each federal agency to ensure that its policies, programs, activities, and standards address disproportionate environmental health or safety risks to children that could potentially result from the agency's actions. EO 13045 recognizes that growing scientific knowledge demonstrates that children may suffer disproportionately from environmental health and safety risks due to still developing neurological, immunological, physiological, and behavioral systems. Examples of risks to children include increased traffic volumes and industrial activities that would generate substances or pollutants that children could encounter and ingest. Historically, children have not been present as students, residents, or frequent visitors at USDA-ARS Tifton.

### **3.9.2 Environmental Consequences**

#### **3.9.2.1 Proposed Action**

The Proposed Action would have less than significant impacts on socioeconomics. There would be no increase in population or workforce for the Project Site. There would be minor beneficial direct and indirect impacts on the local economy resulting from construction, renovation, and infrastructure upgrade activities. These impacts would be minor and short-term. Local business could experience a short-term increase in employment and sales, and a short-term increase in construction workers could increase payroll taxes and purchase of goods and services in areas surrounding the Project Site.

There would not be any expected adverse impacts to environmental justice communities, even though approximately 45 percent of the Tift County population are minorities, the Proposed Action would take place on federal property away from residences or facilities used by the public. Additionally, the Proposed Action is not within the vicinity of a child development center or school, so there are no areas where children would be disproportionately affected by construction impacts. Implementation of the Proposed Action would not result in adverse impacts on socioeconomics. No adverse impacts to minority or, low-income populations, or to children would be expected.

#### **3.9.2.2 No Action Alternative**

Under the No Action Alternative, the SEWRU and CGRBU would continue to operate at separate locations from the USDA-ARS. The lease with UGA will need to be renewed or new locations will need to be found for the SEWRU and CGRBU. If the lease is renewed, there would be no changes or impacts to socioeconomics. If the lease is not renewed and new locations need to be acquired for SEWRU and CGRBU, further analysis would occur to evaluate the potential for impacts on existing socioeconomic conditions.

### **3.10 Utilities**

This section provides an overview of the existing utility infrastructure at the Project Site and the potential impacts to utilities that would be associated with the No Action or Proposed Action Alternatives. Components of the existing utility infrastructure that are analyzed include electricity, water, sanitary sewer, natural gas, stormwater, and communications.

#### **3.10.1 Affected Environment**

Georgia Power provides electricity to the USDA-ARS buildings through overhead powerlines throughout the site. Electricity is provided to Buildings 001, 059, and 084. Buildings 089, 091, 092, and 093 do not receive any electrical service. Water and sanitary sewer services are provided by the City of Tifton. Buildings 001, 091, and 092 receive water service, and only Building 001 has sanitary sewer. Natural gas service is provided by the City of Tifton Gas and supplied only to Building 001. No septic tanks are present onsite. Communications services are provided to Building 001 by AT&T and Mediacom. Stormwater at the Project Site is collected through a series of underground catch basins that discharge through a storm drain to an underground pipe in the eastern area of the site.

#### **3.10.2 Environmental Consequences**

##### **3.10.2.1 Proposed Action**

Under the Proposed Action, a new Laboratory Building and new Support Building would be constructed. The new buildings would include electrical, water, sanitary sewer, natural gas, and communications services. Existing Buildings 059, 084, 089, 091, 092, and 093 would be removed or demolished and the electrical and water services associated with these buildings would be relocated or removed, as needed. Utility upgrades are proposed for Building 001 as part of the proposed renovation, including new electrical lighting and HVAC systems.

New utility connections would be provided, as required, to the new buildings in accordance with the utility provider's recommendations. Existing connections to Building 001 and Buildings 059, 084, 089, 091, 092, and 093 would be evaluated, relocated, replaced, or removed, as necessary. As-built information would be provided, or a field investigation would be performed to evaluate the condition and capacity of the sanitary sewer pumpstation. The pumpstation would be renovated or removed and replaced as necessary. Federal development projects are required to implement controls that reduce stormwater runoff to protect water resources. Section 438 of the Energy Independence and Security Act of 2007 (EISA), along with technical guidance issued by the USEPA, provides a variety of approved stormwater management practices that reduce runoff to water resources (USEPA, 2009). Stormwater infrastructure at the Project Site, especially



in the eastern portion, would be redesigned to accommodate the proposed expanded parking area and the proposed new buildings. The designs would comply with EISA requirements as well as the Georgia Soil and Water Conservation Commission's National Pollutant Discharge Elimination Systems (NPDES) permit requirements.

There could be temporary disruptions to utilities services and infrastructure at the Project Site during construction on the new buildings, demolition of the existing building, and renovation of Building 001. These potential disruptions would be a minor, temporary adverse impact. The proposed action would result in long-term beneficial impacts because of the improved efficiency, reliability, and capacity of the utility systems at the Project Site.

### **3.10.2.2 No Action Alternative**

Under the No Action Alternative, SEWRU and CGRBU would continue operating in existing facilities that are primarily outdated, inefficient, require frequent maintenance and repair, or are otherwise inadequate. There would be no change in infrastructure or increases in efficiencies from the replacement of existing facilities. There also would be no short-term interruptions in utility services. Under the No Action Alternative, there would be no beneficial or adverse impacts.

## **3.11 Traffic and Transportation**

### **3.11.1 Affected Environment**

The Project Site is located on Davis Road in Tift County, GA near the UGA Tifton Campus. The primary entrance to the site is via the access point from the south via Bermuda Drive and from the north via Davis Road. The area around the site is primarily served by U.S. Highway No. 41, Interstate 75 (I-75), and U.S. Highway No. 82. Parking at the Project Site is limited to two small lots north and northwest of Building 001 providing 25 spaces, 10 parking spaces east of Building 002, and approximately 15 spaces along the west side of Building 003. Traffic patterns through the Project Site are disjointed and dangerous, especially to pedestrians walking between buildings and to the adjacent UGA Tifton Campus. The north entrance into the site on Davis Road is gated, but the south entrance on Bermuda Drive is open.

Given the Project Site's proximity to Interstate 75, it is anticipated that most material deliveries will arrive via the two closest I-75 exits ramps. Exit 64 takes drivers to U.S. Highway 41. According to the GDOT's Traffic Analysis and Data Application website, which uses data collected from the Georgia Traffic Monitoring Program, Exit 64 from I-75 South experiences an annual daily average of 830 vehicle trips. Exit 64 from I-75 North experiences an annual daily average of 3,830 daily trips. In the same vicinity to I-75, U.S. Highway 41 experiences an annual daily average of 9,500 vehicle trips. Average annual daily trips

(AADT) counts from 2020, are also available along Davis Road (5,280), Rainwater Road (2,890), and Moore Highway (5,180). These roads are the main thoroughfares between I-75 and the Project Site. Peak traffic counts occurs during the morning commute (7am – 9am) and in the afternoon (3:30pm – 5:30pm) when Tifton residents are commuting to and from work and school.

### **3.11.2 Environmental Consequences**

#### **3.11.2.1 Proposed Action**

Under the Proposed Action, Buildings 091 and 092 would be demolished to accommodate the proposed roadway realignment through the Project Site and proposed new parking areas. The proposed roadway realignment, including a new gate at the Davis Road entrance, would improve traffic patterns and safety through the Project Site. The additional parking spaces would provide adequate parking for the existing and proposed SYs relocating to the Project Site from the UGA Tifton Campus. Parking lots, sidewalks, and new building entrances would be designed in accordance with American with Disabilities Act rules.

The proposed action would result in moderate temporary adverse impacts on the existing traffic conditions within the Project Site and surrounding roads because of the increase in construction vehicle traffic and road work. The existing roadways are capable of accommodating the additional temporary construction traffic from materials deliveries and worker vehicles without impacting the existing flow or trip times significantly. Any increase in traffic, due to the addition of Project-related vehicles, would be short-term and negligible.

Parking lots would be reconfigured and expanded to accommodate the new facilities. There would be a long-term moderate beneficial impact to the Project Site from the road realignment resulting in improved traffic flow through the site, improved gates that deter unauthorized parking and visitors, and additional parking spaces. Even with the consolidation of employees from the UGA Tifton Campus to a single site, the increase in vehicles accessing the site would not result in an adverse impact because any increase in vehicles would be offset by the modernization of the gates and the realignment of the roadway which would create a smoother traffic pattern as well as ingress and egress of the Project Site.

#### **3.11.2.2 No Action Alternative**

Under the No Action Alternative, SEWRU and CGBRU would continue to operate at different locations and there would be no demolition, construction, or renovation at the site. There would be no noticeable change the current traffic and transportation patterns. The inefficiencies of having operations spread out would continue and future development could be inhibited.

### **3.12 Human Health and Safety**

#### **3.12.1 Affected Environment**

The nearest hospital to the USDA-ARS is the John D Archbold Memorial Hospital, approximately 2.6 miles southeast. There is a community health center, Georgia Alliance of Community Hospitals, approximately 1.7 miles away from the site. Additionally, there is a medical center, Tift Regional Medical Center, approximately 2.1 miles from the site. The nearest fire station is West Side Fire Station, located approximately 1.1 miles to the west of the site. There are four other fire departments within a 1.5-2.7 distance from the site.

#### **3.12.2 Environmental Consequences**

##### **3.12.2.1 Proposed Action**

The Proposed Action would have a short-term minor direct adverse impact on human health and safety related to construction activities. These impacts are summarized below. To address any health and safety hazards that could potentially arise during construction, USDA-ARS would develop a Health and Safety Plan to address worker safety during the construction and operation of the proposed projects. The Health and Safety Plan would include provisions for worker protection as is required by the Occupational Safety and Health Administration (OSHA) with emphasis on CFR 1926 – Safety and Health Regulations for Construction. During construction, all employees, contractors, and sub-contractors would be required to conform to OSHA safety procedures. Adequate training would be mandatory for all construction workers on site. Personal safety equipment such as hard hats, ear and eye protection, and safety boots would be required for all workers on site. Accidents and injuries would be reported to the designated safety officer at each site.

The Proposed Action would comply with all relevant federal, state, and local requirements, including all requirements concerning public health and safety, including but not limited to requirements addressing land use, noise, and traffic. The Proposed Action may require updates or modifications to the existing hazardous waste storage and disposal permits. The Proposed Action would minimize any potential human health and safety impacts through prohibiting site access except for the purposes of constructing the proposed projects, and for providing access for emergency equipment, and for police and fire protection. Davis Rd and Rainwater Rd are adequate (width, grade, construction, overall safety, and design capacity) to carry all prospective traffic and entrance to the site is not open to public access.

Risk of accidental fire during construction could occur from human activities such as refueling and cigarette smoking. The Health and Safety plan would reduce fire-related risks to acceptable levels by imposing restrictions or procedures regarding these activities. In addition, implementation of industry-approved design measures for all proposed project components would ensure that fire-related risks would remain acceptably low.

During construction and operation, diesel fuel, gasoline, and lubricating oils from heavy equipment and vehicles could be accidentally leaked or spilled. Hydraulic fluid, paints, and solvents would likely be used during construction and operation as well. All used oil generated at the proposed project sites and other potentially hazardous materials (automotive fluids, spray paint cans, etc.) at the site would be collected by a licensed/permitted recycler.

If lead-based paint are present at the site, abatement of said materials would be conducted in conformance with applicable local, state, and federal regulations by a licensed abatement contractor with appropriate Personal Protective Equipment (PPE).

#### **3.12.2.2 No action Alternative**

Under the No Action Alternative, the SEWRU and CGBRU would continue to operate at locations separate from USDA-ARS and there would be no immediate changes to human health or safety. This would impede renovations, construction, and the roadway realignment which would delay or permanently remove the opportunity for improved through-traffic, increased security at entrance points, and improved pedestrian safety. Any hazardous materials storage would continue to occur under the requirements of existing permits for these facilities.

### **3.13 Aesthetics and Visual Resources**

Visual resources are described as physical features or visual characteristics, both natural and anthropogenically influenced, of a place that define the visual and aesthetic character of an area. The following sections describe the aesthetic and visual characteristics of the Project Site and surrounding areas.

#### **3.13.1 Affected Environment**

The Project Site contains a group of buildings, structures, and equipment constructed between 1962 and the 2000s. The core of the historic-age portion of the campus includes the main laboratory building (B001) and supporting facilities such as greenhouses, warehouses, and chemical storage buildings constructed between 1962 and the mid-1970s (B002, B003, B004, B007, B008, B013, and B015). The historic-age resources are primarily associated with plant and insect research overseen by the CGBRU. Resources B089 and B093 represent portable prefabricated drying houses constructed in the mid- to late-1970s. The remaining

buildings, structures, and equipment associated with the campus postdate the historic period and were constructed to replace outdated or obsolete building stock and to support the evolving needs of the research scientists as farm practices and technology changed during the late-twentieth century.

The remnant historic-age buildings are all utilitarian and functional design and have undergone alterations over the years to keep them viable. Most have experienced replacement materials, including windows, cladding, and overhead doors. Others have experienced additions or other significant footprint alterations, detracting from their overall integrity of design, materials, and workmanship. Despite alterations and non-historic-age infill, the complex maintains associations with defined historic contexts relevant to the surrounding NRHP-eligible UGA Tifton Historic District. The core historic-age resources on the Project Site were constructed during a corresponding building boom at UGA during the 1950s and 1960s that included both “large permanent buildings...as well as smaller ones such as corn cribs and other specialized crop-related storage and processing facilities and greenhouses” (Wiss, Janney, Elstner Associates, Inc. et al. 2019).

### **3.13.2 Environmental Consequences**

#### **3.13.2.1 Proposed Action**

The Proposed Action would have minor impacts to aesthetics and visual resources. Incorporation of design elements would maintain the overall aesthetic and character of the original viewshed. The design process would be coordinated with the Georgia SHPO to meet the expected historic preservation guidelines. To further minimize impacts to aesthetics, many of the existing pine trees within construction limits for all the buildings would be left to maintain the current visual landscape. Impacts to the site and surrounding viewshed are not anticipated.

#### **3.13.2.2 No Action Alternative**

The No Action Alternative would have no effects on aesthetics and visual resources, as it would result in no construction or alterations of the buildings. Under the No Action Alternative, SEWRU and CGRBU would continue operating in existing facilities that are primarily outdated, inefficient, require frequent maintenance and repair, or are otherwise inadequate. There would be no impacts to the sites or their viewsheds.

## 4.0 CUMULATIVE IMPACTS

A cumulative impact, as defined by the Council on Environmental Quality (CEQ), is described as an impact on the environment that results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes such other actions. Cumulative impacts can result from individually minor but aggregately significant actions taking place over a period of time (40 CFR 1508.7). A cumulative impacts analysis acknowledges the effects of the proposed alternatives on the various environmental resources. The analysis also recognizes the effects of other past, present, and reasonably foreseeable future actions, and describes the cumulative or additive effects that may result. While some cumulative effects, however minimal, can be established for virtually any resource or condition, the effects described in this EA are considered to be the most applicable and representative of those associated with the Proposed Action. Cumulative impacts associated with the Proposed Action are described below in the following resource sections. This section addresses the cumulative impacts of the project when combined with any reasonably foreseeable future action.

For a project to contribute towards a cumulative impact, it must result in an impact, either adverse or beneficial, on a certain resource. For example, the proposed project would not result in impacts on land use; therefore, it could not contribute towards a cumulative impact on land use.

### 4.1 Projects and Activities Considered

In order to understand the contribution of past actions to the cumulative impacts of the proposed action, this analysis relies on current environmental conditions as a proxy for the impacts of past actions. This is because existing conditions reflect the aggregate impact of all prior human actions and natural events that have affected the environment and might contribute to cumulative effects. In this analysis, we generally consider the impacts of past projects within the resource-specific geographic scopes as part of the affected environment (environmental baseline), which was described under the specific resources discussed throughout section 3.0. However, this analysis does include the present effects of past actions that are relevant and useful. This analysis of cumulative impacts includes other actions meeting the following three criteria:

- the action impacts a resource that is also potentially affected by the proposed project;
- the action causes the impacts within all or part of the same geographic scope as the proposed project; and
- the action causes this impact within all or part of the temporal scope for the potential impacts from the Proposed Action.

**Table 4-1 Resource-Specific Geographic Regions for Determining Cumulative Impacts of the Project**

<b>Resource(s)</b>	<b>Cumulative Impact Geographic Scope</b>	<b>Justification for Geographic Scope</b>
Land Use	½ mile from the Project Site	The Project would not result in impacts on land use; therefore, it would not contribute towards a cumulative impact on land use.
Geological resources and soils	The area of disturbance for the Project and other projects would be overlapping or immediately abutting one another and would involve grading or demolition.	Impacts on geological resources and soils would be highly localized and primarily limited to the Project Site during active construction. Cumulative impacts would only occur if other geographically overlapping or abutting projects were constructed at the same time as the Project.
Vegetation and Wildlife	½ mile from the Project Site. For less-transient species, such as reptiles and amphibians, the geographic scope will be the area immediately within and abutting the Project Site.	Given the amount of both foot and vehicle traffic, as well as the professionally landscaped vegetation, ½ mile is an appropriate area for evaluating whether the proposed Project may contribute towards a cumulative impact on vegetation and wildlife resources.
Surface Water, groundwater, aquatic resources	HUC-12 subwatershed boundary.	Impacts on surface waters can result in downstream contamination or turbidity; therefore, the geographic scope used to assess cumulative impacts on water and aquatic resources includes the HUC-12 subwatershed that the Project is located within.
Wetlands	¼ mile due to zero wetland impacts from the proposed Project.	Because the Project wouldn't impact wetlands, it cannot contribute towards cumulative impacts on wetlands.
Air Quality	¼ mile because impacts would only be associated with construction activities.	Due to the minimal level of emissions and dust generated by construction equipment, the geographic scope used to assess potential cumulative impacts on air from construction activities was set at ¼ mile.
Noise	¼ mile because impacts would only be associated with construction activities.	The geographic scope for assessing potential cumulative impacts on noise was determined to be areas within the immediate proximity of the construction activities.
Cultural Resources	The area of potential effect of the Project and other projects would be overlapping or immediately abutting one another and involve demolition or renovations.	Adverse impacts on cultural resources would not occur as a result of the Project; therefore, the project would not contribute to a cumulative impact on cultural resources.
Socioeconomics	Affected county.	Due to the Project's limited regional scope and relative short construction duration, the geographic area for assessing contributions to cumulative impact on socioeconomics was evaluated on a county-wide basis.
Infrastructure and Traffic	½ mile from the Project Site.	Due to the very close proximity to I-75, the project would likely only result in recognizable impacts on infrastructure and traffic on surface streets between the I-75 on and off ramps and the Project Site.
Visual Resources	¼ mile	Due to existing vegetation and buildings that screen the visual impacts during construction.

The temporal scope for cumulative actions includes past, present, and reasonably foreseeable projects and actions where the duration of time for construction, operation, and/or restoration overlaps with the timeframe for construction, operation, and restoration of the project. Construction is expected to start in January 2023 and be complete in June 2025. Revegetation of the project areas would be considered complete when 80 percent of the disturbed areas have vegetation cover that is consistent with that of the undisturbed vegetative adjacent to the construction areas. Because professional landscaping will be performed, a period of one growing season (six months) is considered the temporal window for vegetation impacts. For other actions affecting vegetation, the temporal scope for considering cumulative impacts on herbaceous vegetation, when combined with impacts from the project, would be from the start of clearing until successful revegetation. Because the project would use measures to confine exposed soil to the construction area through use of approved BMPs, the temporal scope for cumulative impact on soils would only extend from the moment soils are exposed during demolition and grading until stabilization has been achieved. As both noise and air emissions dissipate almost immediately, the temporal scope for air and noise impacts from construction of the project is limited to concurrent construction.

**Past Actions** - actions that may contribute to cumulative impacts in one or more of the analyzed resource topic areas include: construction, rehabilitation, and maintenance of roadways, utility lines, and other infrastructure. Past actions also include agricultural research activities previously conducted by USDA-ARS and the Tifton Campus Conference Center parking lot improvements in 2021.

**Present Actions** – actions that may contribute to cumulative impacts in one or more of the analyzed resource topic areas include: traffic on nearby roadways and any activities associated with adjacent public or private properties and population growth. Present actions also include ongoing research and related activities conducted by USDA-ARS.

**Future Actions** – There is planned reconstruction/rehabilitation and maintenance for sections of state road (SR) 125 within Tift County. These actions would create changes in traffic patterns, energy usage, socioeconomics, utility infrastructure, biological resources, and air quality, geography, topography, and soils. When combined with the potential impacts of the proposed project, these future actions could contribute to a cumulative impact on certain resource areas that also would be affected by the project.



**Table 4-2 Past, Present, and Future Development**

Project Name	GDOT Project ID	Project Manager	Type of Project	Distance to Project (mi.)	Description of Project
<b>Past Projects</b>					
Tifton-Whiddons Mill Road	H002404	N/A	N/A	1.02	N/A
CR 75/Carpenter Rd FM SR 520/US 82 to Davis Rd in Tifton	0003430	Aghdas Sootodeh Ghazi, Program Delivery	Reconstruction / Rehabilitation	0.97	The project consists of reconstruction and widening CR 76/Carpenter Rd in Tifton from SR 520/US 82 to Davis Rd.
Off-System Safety Improvements @ 11 Locs in Tift County	0012910	Charity L. Belford, Local Grants Office	Safety	1.21	N/A
I-75 @ MP 63 – Emergency SLOPE Repair – Site 6	M004103	Cale Durrence, Maintenance	Maintenance	0.32	The project consists of emergency slope repair on I-75 at mile 63, also identified as SITE 6.
Tifton-Cordele	H000067	N/A	N/A	0.68	N/A
Moore Hwy From CS 842/RDC Road to CR 34/Zion Hope Road	0015179	Cleopatra Cawon James, Program Delivery	Reconstruction / Rehabilitation	0.60	Off System Project with HB170 on CST Funds only. Minor widening along Moore from RDC Road to Zion Hope Rd. Locals to let project.
Moore Highway in Tifton GA	H002987	N/A	N/A	0.18	N/A
Tifton to Ashburn	H000238	N/A	N/A	0.77	N/A
Exit Numbering FM I-75 to I-75	310490	N/A	N/A	0.16	N/A
Tifton Campus Conference Center Parking Lot Improvements	N/A	Thor Hahn	Renovation	0.54	Increase parking spaces, curb and gutter, new storm water management, parking lot lighting and landscaping at parking islands.
Agricultural and Research Building Restoration	N/A	Thor Hahn	Renovation	0.50	Renovation to provide additional laboratory space, administrative offices, and departmental offices
<b>Present or Ongoing Project</b>					
Greenhouse 4797 and 4622 Renovations	N/A	James Maret, University Architect	Renovation	0.11	Renovations at both greenhouses and regrading at Greenhouse 4622.
<b>Reasonably Foreseeable Future Projects</b>					
SR 125 FM SR 7 to Existing 4-Lane @ CR 413/20 <sup>th</sup> Street	0004748	Albert V. Shelby, Program Delivery	Reconstruction / Rehabilitation	1.52	N/A

## **4.2 Anticipated Impacts**

### **4.2.1 Geology, Topography, and Soils**

Geology, topography, and soil impacts are site-specific and not affected by cumulative development in an area, except where soil erosion may contribute to degradation of water quality or if active construction of another project physically overlapped with construction of the Proposed Action at the same time. With the implementation of soil erosion and sediment control measures, the Proposed Action would likely result in negligible to minor adverse impacts and would not cause a significant impact. Only one of the ongoing projects in Table 4-1 occurs near the Project Site, but this project should be completed when the proposed project would go to construction. Therefore, the Proposed Action is not expected to contribute towards a cumulative effect on geology, topography, and soil when combined with another past, present, or reasonably foreseeable future action.

### **4.2.2 Biological Resources**

According to the USFWS Information for Planning and Consultation (IPaC), there is no protected species critical habitat present within the Project Site. Construction activities associated with the Proposed Action would not impact native habitats or protected species. It is anticipated that Fulwood Park, Connor Park, Agrirama Lake and other nearby open spaces would be protected from future developments and would therefore continue to provide habitat that support the biological diversity of the area. Because the project would not result in direct or indirect adverse impacts to biological resources in the area, it also would not contribute to any cumulative impacts on biological resources.

### **4.2.3 Water Resources**

Continued livestock and agricultural research in the area surrounding the Project Site could result in adverse impacts to water resources if not managed properly, as the amount of sediment and stormwater entering the facility streams and wetlands could increase as a result of construction activities. Increased development on the Project Site and the expansion of the parking area would increase the amount of impervious surface, potentially increasing stormwater flows. New development may have to include pervious pavement, filter strips, and green roofs to offset the increase in impervious surfaces. In the context of current and reasonably foreseeable actions on the facility and adjacent areas, the Proposed Action may contribute to a cumulative increase in sedimentation and stormwater runoff during construction; however, this would be a temporary and minor impact. Once construction is complete and the Project Area is stabilized, is not anticipated to incrementally contribute towards adverse cumulative impacts on water resources in the area, when combined with other past, present, or reasonably foreseeable future projects.

#### **4.2.4 Air Quality, GHGs, and Climate Change**

The cumulative impacts on air quality from implementation of the Proposed Action would be minor. The Proposed Action would not result in emissions above the NAAQS for NO<sub>x</sub>, VOCs and CO. Short-term increases in emissions and fugitive dust from construction activities would temporarily result in minor direct impacts on air quality during active construction. This minor adverse impact would cease after construction is completed. Appropriate control measures would be implemented to minimize fugitive dust emissions. The other projects in Table 4-1 would utilize similar abatement measures for controlling fugitive dusts. Based on available information, these other projects are scheduled to occur at different times and within different geographic locations as compared to the Proposed Action. Therefore, the Proposed Action's contribution to cumulative air quality impacts when combined with other project's construction activities would be short-term and negligible. Long-term beneficial reductions in emissions would ultimately occur at the Project Site by replacing outdated HVAC systems with new and more energy efficient equipment in the new and renovated buildings. Therefore, the Proposed Action has the potential to contribute to minor, long-term, beneficial impact on GHGs due to the decrease in energy consumption and emissions.

#### **4.2.5 Hazardous and Toxic Substances**

Implementation of the Proposed Action would involve providing service access to utility systems and receiving areas without the need to enter sensitive or hazardous areas. Storage facilities would be housed in separate structures compliant with occupational safety and building codes. Any potentially hazardous or toxic materials that will be transported around or removed from the facility would be handled in an appropriate manner. Because of the safety measures that would be taken in accordance with appropriate standards under the Proposed Action, the Proposed Action's contributions to cumulative impacts to hazardous and toxic materials and waste would be short-term and minor.

#### **4.2.6 Noise**

Short-term noise impacts would continue to occur at USDA-ARS associated with the Proposed Action, and other ongoing activities at the facility. The nearby greenhouse renovations will be relatively minor with the regrading being the main source of noise due to the larger machinery in use. As the Proposed Action is only anticipated to generate construction noise and noise associated with accessing and operating the Facility, it is not anticipated that the Proposed Action in combination with any present or reasonably foreseeable future actions would contribute towards cumulative noise events that would trigger high, long-term, non-abatable noise levels on or near the facility. The Proposed Action's contributions to cumulative noise impacts would be short-term and minor during construction and negligible thereafter.

#### **4.2.7 Cultural Resources**

While some historic structures or archaeological sites may be disturbed as a result of the Proposed Action and other past, present, or reasonably foreseeable future actions, it is expected that all projects would comply with Section 106 consultation and mitigation requirements of the NHPA, thereby maintaining overall impacts to cultural resources at minor levels.

#### **4.2.8 Socioeconomics**

The Proposed Action and other current and reasonably foreseeable actions would not adversely impact the socioeconomic setting of the USDA-ARS facility or surrounding blockgroups. Therefore, the Proposed Action would not contribute to long- or short-term adverse impacts. Temporary employment would increase from any construction projects within the Tifton area, which would contribute to a minor cumulative beneficial impact within the area. Long-term/permanent employment on the facility is based on the types of research present. Future redevelopment near USDA-ARS could spawn additional short-term and long-term employment opportunities as new businesses are developed, resulting in minor beneficial impacts on the socioeconomic conditions. However, the overall socioeconomic characteristics of the community would be unlikely to change from identified past, present, and future actions in table 4-1.

#### **4.2.9 Utilities**

Under the Proposed Action and other current and reasonably foreseeable future projects on USDA-ARS, minor infrastructure improvements are expected as existing facilities continue to degrade. The existing utility networks on USDA-ARS are expected to be sufficient to support the planned projects, and any necessary upgrades would be coordinated with the local utility companies to minimize impacts. The proposed consolidation and modernization of the Project Site would also support the future sustainability of the facility leading to greater improved energy efficiency that could in turn result in a decrease in future energy demand. As the Proposed Action is merely improving existing operations on USDA-ARS, there may be negligible short-term impacts during construction. Once construction is complete, the Proposed Action could contribute to minor long-term benefits on utilities within the area. Any contribution towards cumulative adverse impacts on existing utilities would be short-term and negligible during construction.

#### **4.2.10 Traffic and Transportation**

The Proposed Action would connect Bermuda Dr and Davis Rd and may minimally disrupt the local traffic pattern during construction. There is a planned Long-Range reconstruction/rehabilitation project on SR 125 within Tift County that, when combined with the Proposed Action, may result in minimal adverse cumulative impacts on existing traffic during peak commute times if construction activities overlap with that of the Proposed Action. The Proposed Action would not adversely alter any existing transportation

infrastructure and would only contribute to a minor cumulative increase in traffic in the immediate vicinity of the Project Site. There would be no long-term adverse cumulative impact on traffic as a result of the project. Any contribution to cumulative impacts on traffic would be minimal and temporary.

#### **4.2.11 Human Health and Safety**

The Proposed Action is to consolidate existing SEWBRU and CGBRU operations within the UGA Tifton Campus, so operationally, the Proposed Action is not expected to contribute towards cumulative adverse impacts on health and safety of the public. The Proposed Action, along with past, present, and reasonably foreseeable future projects, including the demolition of 6 buildings, construction of 2 buildings, renovation of one building, and parking lot expansion, would be implemented following current industry design requirements and the best practices safety standards allowed by OSHA. These potential projects and the Proposed Action would be constructed in the same service area for emergencies, but the emergency response systems in place are adequate to handle these projects. The Proposed Action's contribution towards cumulative impacts (when combined with the projects listed on table 4-1) on human health and public safety would be negligible.

## 5.0 CITIZEN AND AGENCY COORDINATION

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U.S. Department of Interior  
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Mr. Deron Davis  
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The Nature Conservancy

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Mr. Richard Dunn  
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## **APPENDIX A – AGENCY CONSULTATIONS**



## United States Department of the Interior



FISH AND WILDLIFE SERVICE  
Georgia Ecological Services Field Office  
355 East Hancock Avenue  
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In Reply Refer To:  
Consultation Code: 04EG1000-2022-SLI-0801  
Event Code: 04EG1000-2022-E-01750  
Project Name: USDA Renovation

December 29, 2021

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

### To Whom It May Concern:

Thank you for your recent request for information on federally listed species and important wildlife habitats that may occur in your project area. The U.S. Fish and Wildlife Service (Service) has responsibility for certain species of wildlife under the Endangered Species Act (ESA) of 1973 as amended (16 USC 1531 et seq.), the Migratory Bird Treaty Act (MBTA) as amended (16 USC 701-715), and the Bald and Golden Eagle Protection Act (BGEPA) as amended (16 USC 668-668c). We are providing the following guidance to assist you in determining which federally imperiled species may or may not occur within your project area and to recommend some conservation measures that can be included in your project design if you determine those species or designated critical habitat may be affected by your proposed project.

### **FEDERALLY-LISTED SPECIES AND DESIGNATED CRITICAL HABITAT**

Attached is a list of endangered, threatened, and proposed species that may occur in your project area. Your project area may not necessarily include all or any of these species. Under the ESA, it is the responsibility of the Federal action agency or its designated representative to determine if a proposed action "may affect" endangered, threatened, or proposed species, or designated critical habitat, and if so, to consult with the Service further. Similarly, it is the responsibility of the Federal action agency or project proponent, not the Service, to make "no effect" determinations. If you determine that your proposed action will have "no effect" on threatened or endangered species or their respective critical habitat, you do not need to seek concurrence with the Service. Nevertheless, it is a violation of Federal law to harm or harass any federally-listed threatened or endangered fish or wildlife species without the appropriate permit.

If you determine that your proposed action may affect federally listed species, please consult with the Service. Through the consultation process, we will analyze information contained in a biological assessment or equivalent document that you provide. If your proposed action is associated with Federal funding or permitting, consultation will occur with the Federal agency under section 7(a)(2) of the ESA. Otherwise, an incidental take permit pursuant to section 10(a)(1)(B) of the ESA (also known as a Habitat Conservation Plan) may be necessary to exempt harm or harass federally listed threatened or endangered fish or wildlife species. For more information regarding formal consultation and HCPs, please see the Service's Consultation Handbook and Habitat Conservation Plans at [www.fws.gov/endangered/esa-library/index.html#consultations](http://www.fws.gov/endangered/esa-library/index.html#consultations).

**Action Area.** The scope of federally listed species compliance not only includes direct effects, but also any indirect effects of project activities (e.g., equipment staging areas, offsite borrow material areas, or utility relocations). The action area is the spatial extent of an action's direct and indirect modifications to the land, water, or air (50 CFR 402.02). Large projects may have effects to land, water, or air outside the immediate footprint of the project, and these areas should be included as part of the action area. Effects to land, water, or air outside of a project footprint could include things like lighting, dust, smoke, and noise. To obtain a complete list of species, the action area should be uploaded or drawn in IPaC rather than just the project footprint.

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

If you determine that your action may affect any federally listed species and would like technical assistance from our office please provide the following information (reference to these items can be found in 50 CFR§402.13 and 402.14):

A description of the proposed action, including any measures intended to avoid, minimize, or offset effects of the action. Consistent with the nature and scope of the proposed action, the description shall provide sufficient detail to assess the effects of the action on listed species and critical habitat, including:

1. The purpose of the action;
  2. The duration and timing of the action;
  3. The location of the action;
  4. The specific components of the action and how they will be carried out;
  5. Description of areas to be affected directly or indirectly by the action;
-

6. Information on the presence of listed species in the action area;
7. Description of effects of the action on species in the action area;
8. Maps, drawings, blueprints, or similar schematics of the action; and
9. Any other available information related to the nature and scope of the proposed action relevant to its effects on listed species or designated critical habitat (examples include: stormwater plans, management plans, erosion and sediment plans).

**Please submit all consultation documents via email to [gaes\\_assistance@fws.gov](mailto:gaes_assistance@fws.gov) or by using IPaC, uploaded documents, and sharing the project with a specific Georgia Ecological Services staff member. If the project is on-going, documents can also be sent to the Georgia ES staff member currently working with you on your project. For Georgia Department of Transportation-related projects, please work with the Office of Environmental Services ecologist to determine the appropriate USFWS transportation liaison.**

## **WETLANDS AND FLOODPLAINS**

Under Executive Orders 11988 and 11990, Federal agencies are required to minimize the destruction, loss, or degradation of wetlands and floodplains, and preserve and enhance their natural and beneficial values. These habitats should be conserved through avoidance, or mitigated to ensure that there would be no net loss of wetlands function and value.

We encourage you to use the National Wetland Inventory (NWI) maps in conjunction with ground-truthing to identify wetlands occurring in your project area. The Service's NWI program website, [www.fws.gov/wetlands/Data/Mapper.html](http://www.fws.gov/wetlands/Data/Mapper.html) integrates digital map data with other resource information. We also recommend you contact the U.S. Army Corps of Engineers for permitting requirements under section 404 of the Clean Water Act if your proposed action could impact floodplains or wetlands.

## **MIGRATORY BIRDS**

The MBTA prohibits the taking of migratory birds, nests, and eggs, except as permitted by the Service's Migratory Bird Office. To minimize the likelihood of adverse impacts to migratory birds, we recommend construction activities occur outside the general bird nesting season from March through August, or that areas proposed for construction during the nesting season be surveyed, and when occupied, avoided until the young have fledged.

We recommend review of Birds of Conservation Concern at website [www.fws.gov/migratorybirds/CurrentBirdIssues/Management/BCC.html](http://www.fws.gov/migratorybirds/CurrentBirdIssues/Management/BCC.html) to fully evaluate the effects to the birds at your site. This list identifies birds that are potentially threatened by disturbance and construction.

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Information related to wind energy development and migratory birds can be found at this location: <https://www.fws.gov/birds/management/project-assessment-tools-and-guidance/guidance-documents/wind-energy.php>.

## **BALD AND GOLDEN EAGLES**

The bald eagle (*Haliaeetus leucocephalus*) was delisted under the ESA on August 9, 2007. Both the bald eagle and golden eagle (*Aquila chrysaetos*) are still protected under the MBTA and BGEPA. The BGEPA affords both eagles protection in addition to that provided by the MBTA, in particular, by making it unlawful to “disturb” eagles. Under the BGEPA, the Service may issue limited permits to incidentally “take” eagles (e.g., injury, interfering with normal breeding, feeding, or sheltering behavior nest abandonment). For information on bald and golden eagle management guidelines, we recommend you review information provided at <https://www.fws.gov/birds/management/managed-species/bald-and-golden-eagle-information.php> and <https://www.fws.gov/birds/management/managed-species/eagle-management.php>. Additionally the following site will help you determine if your activity is likely to take or disturb bald eagles in the southeast (<https://www.fws.gov/southeast/our-services/eagle-technical-assistance>).

## **NATIVE BAT COMMENTS**

If your species list includes Indiana bat or northern long-eared bat and the project is expected to impact forested habitat that is appropriate for maternity colonies of these species, forest clearing during the winter. Federally listed bats could be actively present in forested landscapes from April 1 to October 15 of any year and have non-volant pups from May 15 to July 31 in any year. Non-volant pups are incapable of flight and are vulnerable to disturbance during that time.

Additional information on bat avoidance and minimization can be found at the following link: [https://www.fws.gov/athens/transportation/pdfs/Bat\\_AMMs.pdf](https://www.fws.gov/athens/transportation/pdfs/Bat_AMMs.pdf).

Additional information that addresses at-risk or high priority natural resources can be found in the State Wildlife Action Plan (<https://georgiawildlife.com/WildlifeActionPlan>), at Georgia Department of Natural Resources, Wildlife Resources Division Rare Species and Natural Community Portal (<https://georgiawildlife.com/conservation/species-of-concern>), Georgia's Natural, Archaeological, and Historic Resources GIS portal (<https://www.gnahrgis.org/gnahrgis/index.do>), and Georgia Ecological Services Watershed Guidance portal (<https://www.fws.gov/athens/transportation/coordination.html>).

Thank you for your concern for endangered and threatened species. We appreciate your efforts to identify and avoid impacts to listed and sensitive species in your project area. For further consultation on your proposed activity, please email [gaes\\_assistance@fws.gov](mailto:gaes_assistance@fws.gov) and reference your Service Consultation Tracking Number (Consultation Code).

This letter constitutes Georgia Ecological Services' general comments under the authority of the Endangered Species Act.

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Attachment(s):

- Official Species List
- Migratory Birds

## Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

**Georgia Ecological Services Field Office**

355 East Hancock Avenue

Room 320

Athens, GA 30601

(706) 613-9493

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## Project Summary

Consultation Code: 04EG1000-2022-SLI-0801

Event Code: Some(04EG1000-2022-E-01750)

Project Name: USDA Renovation

Project Type: \*\* OTHER \*\*

Project Description: Renovation of USDA Facility

Project Location:

Approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@31.4779099,-83.5264910475871,14z>



Counties: Tift County, Georgia

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## Endangered Species Act Species

There is a total of 4 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries<sup>1</sup>, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

## Reptiles

NAME	STATUS
Eastern Indigo Snake <i>Drymarchon corais couperi</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/646">https://ecos.fws.gov/ecp/species/646</a>	Threatened
Gopher Tortoise <i>Gopherus polyphemus</i> Population: eastern No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/6994">https://ecos.fws.gov/ecp/species/6994</a>	Candidate
Suwannee Alligator Snapping Turtle <i>Macrochelys suwanniensis</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/10891">https://ecos.fws.gov/ecp/species/10891</a>	Proposed Threatened

## Insects

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/9743">https://ecos.fws.gov/ecp/species/9743</a>	Candidate

## Critical habitats

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

## Migratory Birds

Certain birds are protected under the Migratory Bird Treaty Act<sup>1</sup> and the Bald and Golden Eagle Protection Act<sup>2</sup>.

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described [below](#).

- 
1. The [Migratory Birds Treaty Act](#) of 1918.
  2. The [Bald and Golden Eagle Protection Act](#) of 1940.
  3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

The birds listed below are birds of particular concern either because they occur on the [USFWS Birds of Conservation Concern](#) (BCC) list or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ [below](#). This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the [E-bird data mapping tool](#) (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found [below](#).

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
<b>American Kestrel <i>Falco sparverius paulus</i></b> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA <a href="https://ecos.fws.gov/ecp/species/9587">https://ecos.fws.gov/ecp/species/9587</a>	Breeds Apr 1 to Aug 31
<b>Bald Eagle <i>Haliaeetus leucocephalus</i></b> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. <a href="https://ecos.fws.gov/ecp/species/1626">https://ecos.fws.gov/ecp/species/1626</a>	Breeds Sep 1 to Jul 31

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NAME	BREEDING SEASON
<b>Prairie Warbler <i>Dendroica discolor</i></b> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 1 to Jul 31
<b>Red-headed Woodpecker <i>Melanerpes erythrocephalus</i></b> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 10 to Sep 10
<b>Rusty Blackbird <i>Euphagus carolinus</i></b> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA	Breeds elsewhere

## Probability Of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

### Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is  $0.25/0.25 = 1$ ; at week 20 it is  $0.05/0.25 = 0.2$ .
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

### Breeding Season (■)



Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

### Survey Effort (|)

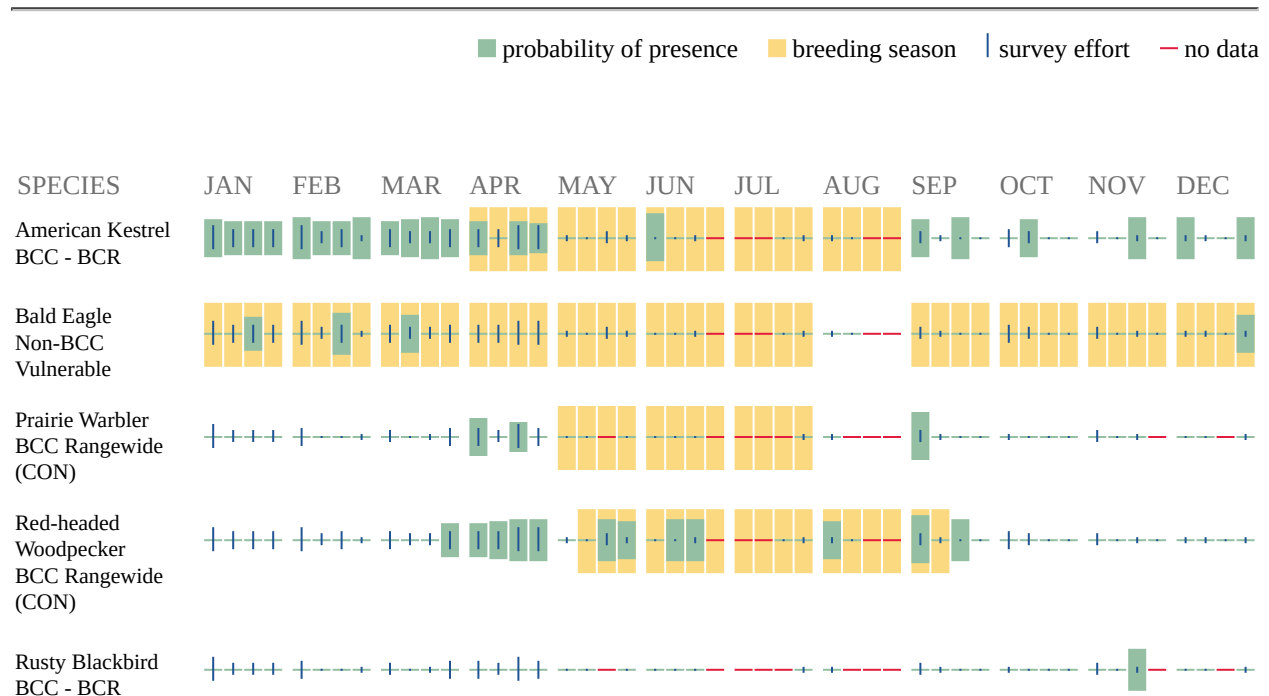
Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

### No Data (—)

A week is marked as having no data if there were no survey events for that week.

### Survey Timeframe

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.



Additional information can be found using the following links:

- Birds of Conservation Concern <http://www.fws.gov/birds/management/managed-species/birds-of-conservation-concern.php>
- Measures for avoiding and minimizing impacts to birds <http://www.fws.gov/birds/management/project-assessment-tools-and-guidance/conservation-measures.php>
- Nationwide conservation measures for birds <http://www.fws.gov/migratorybirds/pdf/management/nationwidestandardconservationmeasures.pdf>

## Migratory Birds FAQ

**Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.**

[Nationwide Conservation Measures](#) describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. [Additional measures](#) or [permits](#) may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

**What does IPaC use to generate the migratory birds potentially occurring in my specified location?**

The Migratory Bird Resource List is comprised of USFWS [Birds of Conservation Concern \(BCC\)](#) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle ([Eagle Act](#) requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the [AKN Phenology Tool](#).

**What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?**

The probability of presence graphs associated with your migratory bird list are based on data provided by the [Avian Knowledge Network \(AKN\)](#). This data is derived from a growing collection of [survey, banding, and citizen science datasets](#).

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

**How do I know if a bird is breeding, wintering, migrating or present year-round in my project area?**

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may refer to the following resources: [The Cornell Lab of Ornithology All About Birds Bird Guide](#), or (if you are unsuccessful in locating the bird of interest there), the [Cornell Lab of Ornithology Neotropical Birds guide](#). If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your

project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

### **What are the levels of concern for migratory birds?**

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are [Birds of Conservation Concern](#) (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the [Eagle Act](#) requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

### **Details about birds that are potentially affected by offshore projects**

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the [Northeast Ocean Data Portal](#). The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the [NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf](#) project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the [Diving Bird Study](#) and the [nanotag studies](#) or contact [Caleb Spiegel](#) or [Pam Loring](#).

### **What if I have eagles on my list?**

If your project has the potential to disturb or kill eagles, you may need to [obtain a permit](#) to avoid violating the Eagle Act should such impacts occur.

### **Proper Interpretation and Use of Your Migratory Bird Report**

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no

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data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

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August 31, 2021

Ms. Joyce A. Stanley  
Regional Environmental Officer  
Department of the Interior  
Office of Environmental Policy and Compliance, Atlanta Region  
75 Ted Turner Drive, S.W. Suite 1144  
Atlanta, GA 30303

Re: U.S. Department of Agriculture  
U.S. Department of Agriculture-Agricultural Research Service Laboratory Modernization  
Project, Tifton, GA.

Dear Ms. Stanley:

U.S. Department of Agriculture's Agriculture Research Service (USDA-ARS) is conducting scoping as part of the preparation of an Environmental Assessment (EA) in accordance with the National Environmental Policy Act (NEPA), for the USDA-ARS Laboratory Modernization Project (Project) at USDA-ARS's Tifton Laboratory Campus in Tifton, Georgia. The U.S. Army Corps of Engineers (USACE) Savannah District is supporting USDA-ARS by providing technical services for the Project.

USDA-ARS is proposing the modernization of the ARS Tifton Laboratory Campus in Tifton, GA. The Project would include the relocation and/or consolidation of the Southwest Watershed Research Unit and the Crop Genetics and Breeding Research Unit from the University of Georgia campus to the USDA-ARS Tifton Campus. The Project includes demolition of existing structures, remodeling of existing structures, construction of two new laboratory and office buildings, construction and expansion of new and existing parking lots, and utility infrastructure upgrades.

USDA-ARS is requesting information from your agency regarding the resources that should be included and discussed in the EA. A General Vicinity Map and a Project Site Plan Map are enclosed for your reference. Your input or information regarding any of the following resources is appreciated:

- Land use
- Aesthetics
- Water quality, streams/wetlands, groundwater, surface water, and stormwater
- Topography, soils and geology
- Prime Farmland
- Wildlife, vegetation and fisheries, including threatened and endangered species
- Socioeconomics (population, employment, growth, development)
- Hazardous and toxic materials and wastes

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- Cultural resources (historic and archaeological sites, cemeteries)
- Transportation and roads (airport and roadway expansions, construction, operations and maintenance)
- Utilities
- Noise
- Air Quality
- Safety

USACE has contracted with Burns and McDonnell for the preparation of the EA, please contact Sara Kent, the Burns and McDonnell project manager, at (470) 508-9904 or at [sskent@burnsmcd.com](mailto:sskent@burnsmcd.com) if you need additional information.

We would appreciate your written response within thirty (30) days of your receipt of this request. Responses may be mailed to 4004 Summit Boulevard NE, Suite 1200, Atlanta, GA 30319 or emailed to [sskent@burnsmcd.com](mailto:sskent@burnsmcd.com).

Sincerely,

Nicholas Girken  
USDA, Project Manager

Nicholas  
Girken

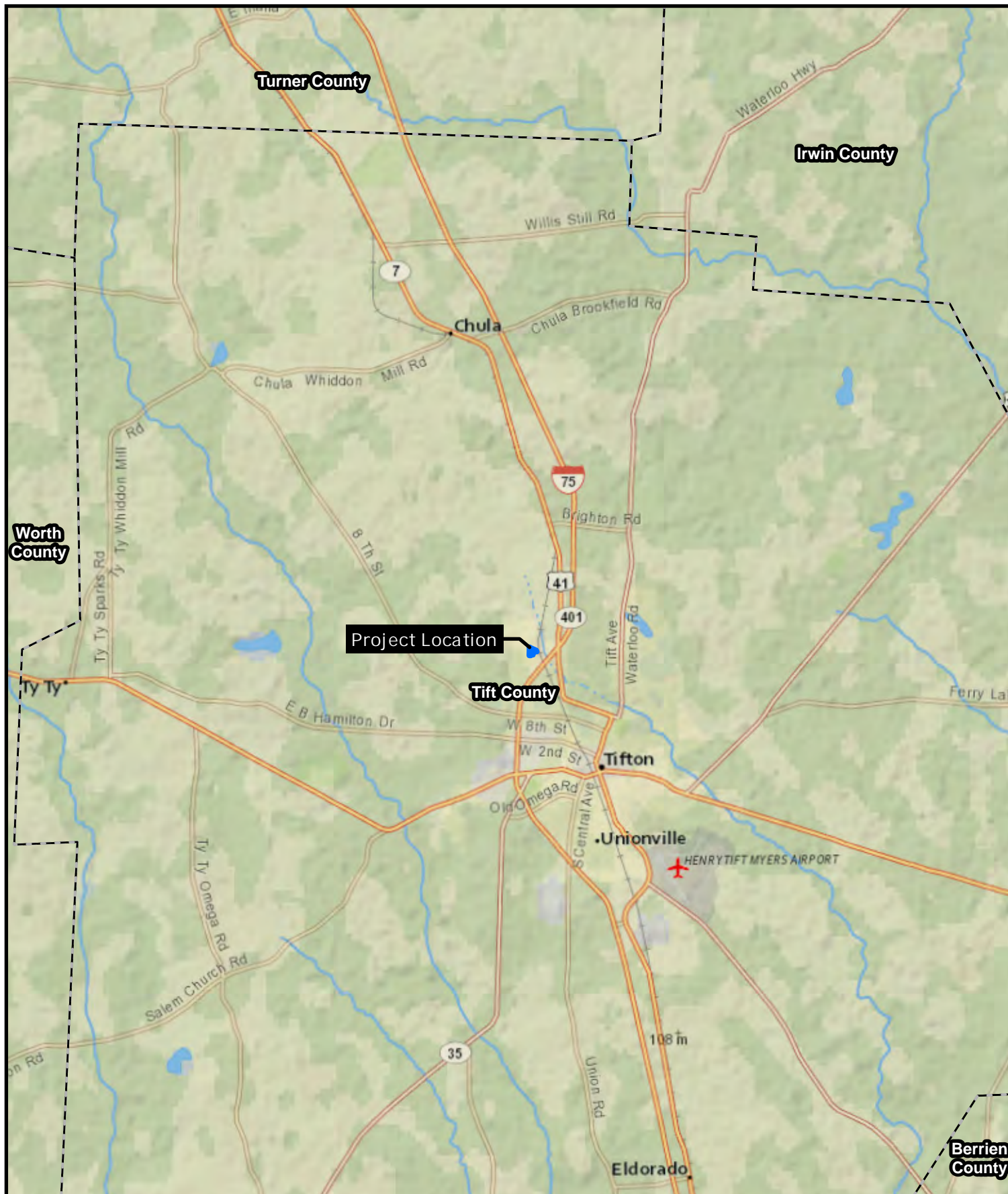
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Date: 2021.09.03  
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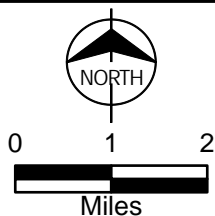
Appendix A: Project Maps

## **APPENDIX A -PROJECT MAPS**





- Site Boundary
- County Boundary



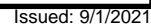
**BURNS  
MCDONNELL**

## General Vicinity Map

### USDA-ARS Laboratory Modernization Project

### Tifton, Georgia







August 31, 2021

Mr. Charles McMillan  
Coastal Director  
Georgia Conservancy  
428 Bull Street, Suite 210  
Savannah, GA 31401

Re: U.S. Department of Agriculture  
U.S. Department of Agriculture-Agricultural Research Service Laboratory Modernization  
Project, Tifton, GA.

Dear Mr. McMillan:

U.S. Department of Agriculture's Agriculture Research Service (USDA-ARS) is conducting scoping as part of the preparation of an Environmental Assessment (EA) in accordance with the National Environmental Policy Act (NEPA), for the USDA-ARS Laboratory Modernization Project (Project) at USDA-ARS's Tifton Laboratory Campus in Tifton, Georgia. The U.S. Army Corps of Engineers (USACE) Savannah District is supporting USDA-ARS by providing technical services for the Project.

USDA-ARS is proposing the modernization of the ARS Tifton Laboratory Campus in Tifton, GA. The Project would include the relocation and/or consolidation of the Southwest Watershed Research Unit and the Crop Genetics and Breeding Research Unit from the University of Georgia campus to the USDA-ARS Tifton Campus. The Project includes demolition of existing structures, remodeling of existing structures, construction of two new laboratory and office buildings, construction and expansion of new and existing parking lots, and utility infrastructure upgrades.

USDA-ARS is requesting information from your agency regarding the resources that should be included and discussed in the EA. A General Vicinity Map and a Project Site Plan Map are enclosed for your reference. Your input or information regarding any of the following resources is appreciated:

- Land use
- Aesthetics
- Water quality, streams/wetlands, groundwater, surface water, and stormwater
- Topography, soils and geology
- Prime Farmland
- Wildlife, vegetation and fisheries, including threatened and endangered species
- Socioeconomics (population, employment, growth, development)
- Hazardous and toxic materials and wastes
- Cultural resources (historic and archaeological sites, cemeteries)

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Washington, D.C. 20250  
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- Transportation and roads (airport and roadway expansions, construction, operations and maintenance)
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USACE has contracted with Burns and McDonnell for the preparation of the EA, please contact Sara Kent, the Burns and McDonnell project manager, at (470) 508-9904 or at [sskent@burnsmcd.com](mailto:sskent@burnsmcd.com) if you need additional information.

We would appreciate your written response within thirty (30) days of your receipt of this request. Responses may be mailed to 4004 Summit Boulevard NE, Suite 1200, Atlanta, GA 30319 or emailed to [sskent@burnsmcd.com](mailto:sskent@burnsmcd.com).

Sincerely,

Nicholas Girken  
USDA, Project Manager

Nicholas  
Girken

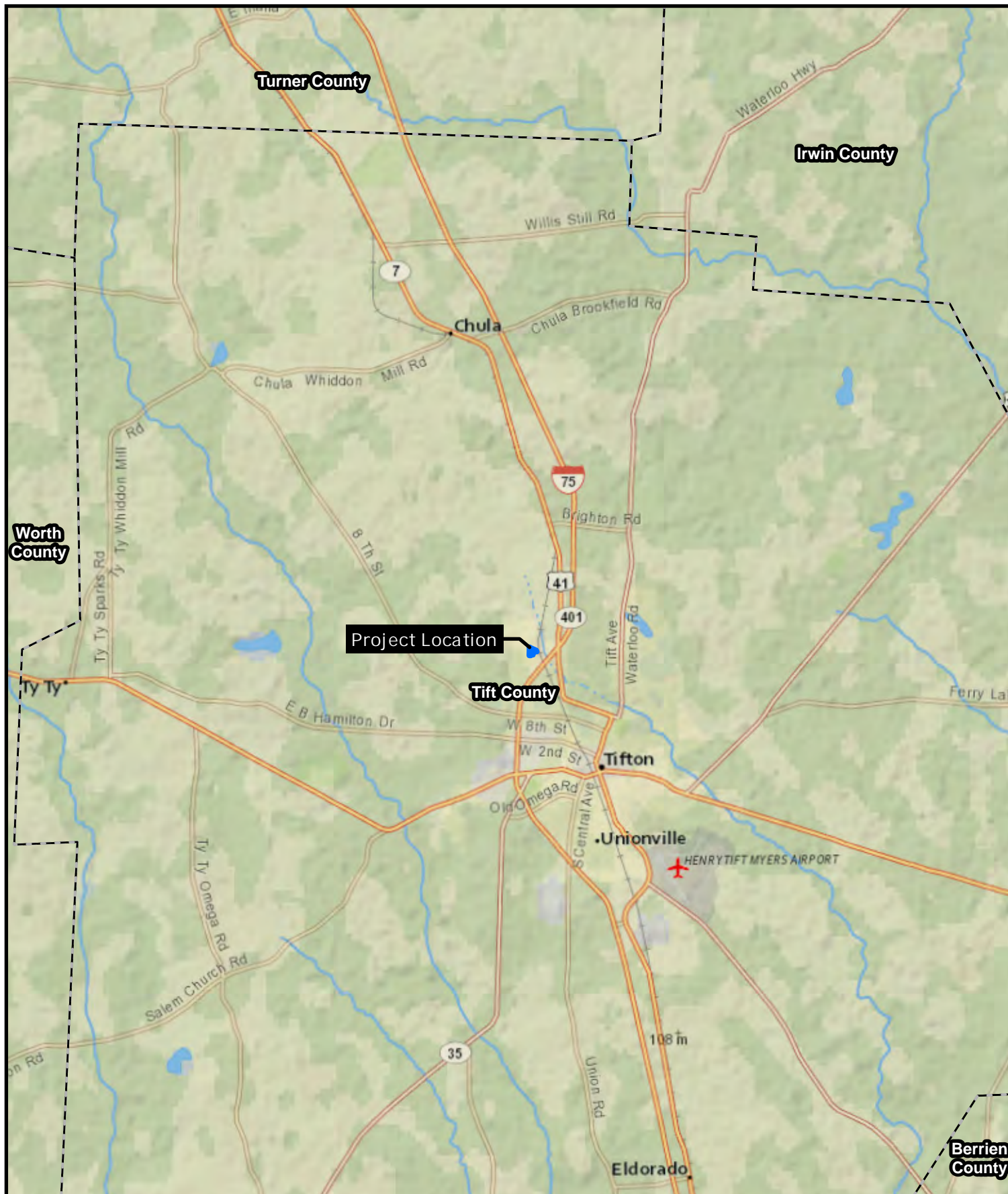
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Nicholas Girken  
Date: 2021.09.03  
12:46:20 -04'00'

cc: Shauna Stotler/USACE

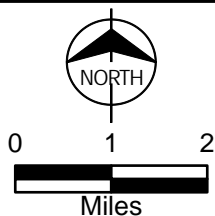
Appendix A: Project Maps

## **APPENDIX A -PROJECT MAPS**





- Site Boundary
- County Boundary



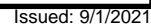
**BURNS  
MCDONNELL**

## General Vicinity Map

### USDA-ARS Laboratory Modernization Project

### Tifton, Georgia







August 31, 2021

Ms. Jane Zoellick  
Vice President  
Georgia Conservancy  
230 Peachtree Street SW  
Atlanta, GA 30303

Re: U.S. Department of Agriculture  
U.S. Department of Agriculture-Agricultural Research Service Laboratory Modernization  
Project, Tifton, GA.

Dear Ms. Zoellick:

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USDA-ARS is proposing the modernization of the ARS Tifton Laboratory Campus in Tifton, GA. The Project would include the relocation and/or consolidation of the Southwest Watershed Research Unit and the Crop Genetics and Breeding Research Unit from the University of Georgia campus to the USDA-ARS Tifton Campus. The Project includes demolition of existing structures, remodeling of existing structures, construction of two new laboratory and office buildings, construction and expansion of new and existing parking lots, and utility infrastructure upgrades.

USDA-ARS is requesting information from your agency regarding the resources that should be included and discussed in the EA. A General Vicinity Map and a Project Site Plan Map are enclosed for your reference. Your input or information regarding any of the following resources is appreciated:

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Washington, D.C. 20250  
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We would appreciate your written response within thirty (30) days of your receipt of this request. Responses may be mailed to 4004 Summit Boulevard NE, Suite 1200, Atlanta, GA 30319 or emailed to [sskent@burnsmcd.com](mailto:sskent@burnsmcd.com).

Sincerely,

Nicholas Girken  
USDA, Project Manager

Nicholas  
Girken

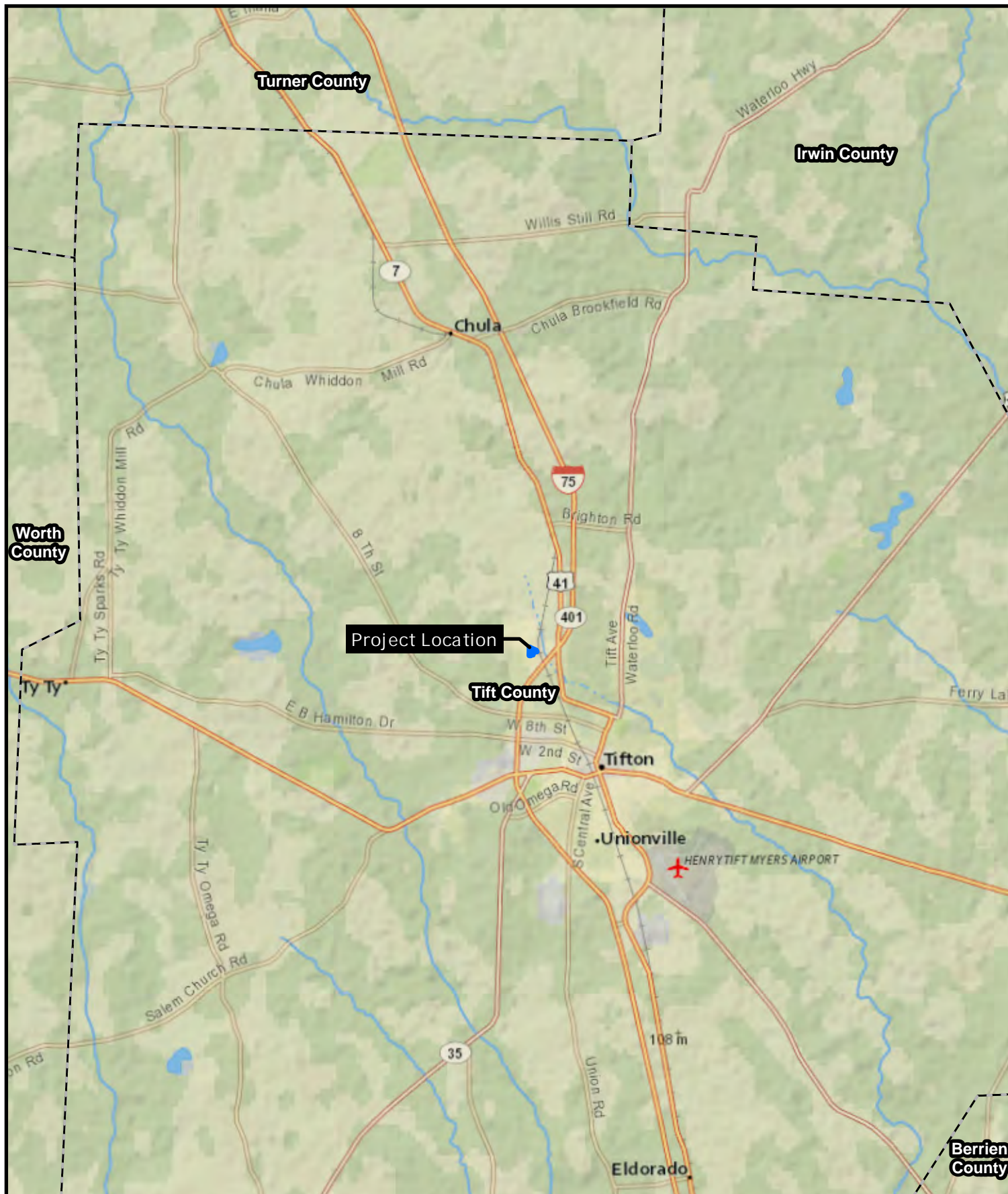
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Date: 2021.09.03  
12:50:05 -04'00'

cc: Shauna Stotler/USACE

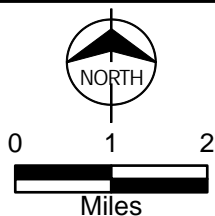
Appendix A: Project Maps



## **APPENDIX A -PROJECT MAPS**



- Site Boundary
- County Boundary



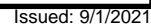
**BURNS  
MCDONNELL**

## General Vicinity Map

### USDA-ARS Laboratory Modernization Project

### Tifton, Georgia







August 31, 2021

Mr. Richard Dunn  
Director  
Environmental Protection Division  
Georgia Department of Natural Resources  
2 MLK JR Drive SE, Suite 1465, East Tower  
Atlanta, GA 30334

Re: U.S. Department of Agriculture  
U.S. Department of Agriculture-Agricultural Research Service Laboratory Modernization  
Project, Tifton, GA.

Dear Mr. Dunn:

U.S. Department of Agriculture's Agriculture Research Service (USDA-ARS) is conducting scoping as part of the preparation of an Environmental Assessment (EA) in accordance with the National Environmental Policy Act (NEPA), for the USDA-ARS Laboratory Modernization Project (Project) at USDA-ARS's Tifton Laboratory Campus in Tifton, Georgia. The U.S. Army Corps of Engineers (USACE) Savannah District is supporting USDA-ARS by providing technical services for the Project.

USDA-ARS is proposing the modernization of the ARS Tifton Laboratory Campus in Tifton, GA. The Project would include the relocation and/or consolidation of the Southwest Watershed Research Unit and the Crop Genetics and Breeding Research Unit from the University of Georgia campus to the USDA-ARS Tifton Campus. The Project includes demolition of existing structures, remodeling of existing structures, construction of two new laboratory and office buildings, construction and expansion of new and existing parking lots, and utility infrastructure upgrades.

USDA-ARS is requesting information from your agency regarding the resources that should be included and discussed in the EA. A General Vicinity Map and a Project Site Plan Map are enclosed for your reference. Your input or information regarding any of the following resources is appreciated:

- Land use
- Aesthetics
- Water quality, streams/wetlands, groundwater, surface water, and stormwater
- Topography, soils and geology
- Prime Farmland
- Wildlife, vegetation and fisheries, including threatened and endangered species
- Socioeconomics (population, employment, growth, development)
- Hazardous and toxic materials and wastes

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1400 Independence Avenue, SW.  
Washington, D.C. 20250  
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- Cultural resources (historic and archaeological sites, cemeteries)
- Transportation and roads (airport and roadway expansions, construction, operations and maintenance)
- Utilities
- Noise
- Air Quality
- Safety

USACE has contracted with Burns and McDonnell for the preparation of the EA, please contact Sara Kent, the Burns and McDonnell project manager, at (470) 508-9904 or at [sskent@burnsmcd.com](mailto:sskent@burnsmcd.com) if you need additional information.

We would appreciate your written response within thirty (30) days of your receipt of this request. Responses may be mailed to 4004 Summit Boulevard NE, Suite 1200, Atlanta, GA 30319 or emailed to [sskent@burnsmcd.com](mailto:sskent@burnsmcd.com).

Sincerely,

Nicholas Girken  
USDA, Project Manager

Nicholas  
Girken

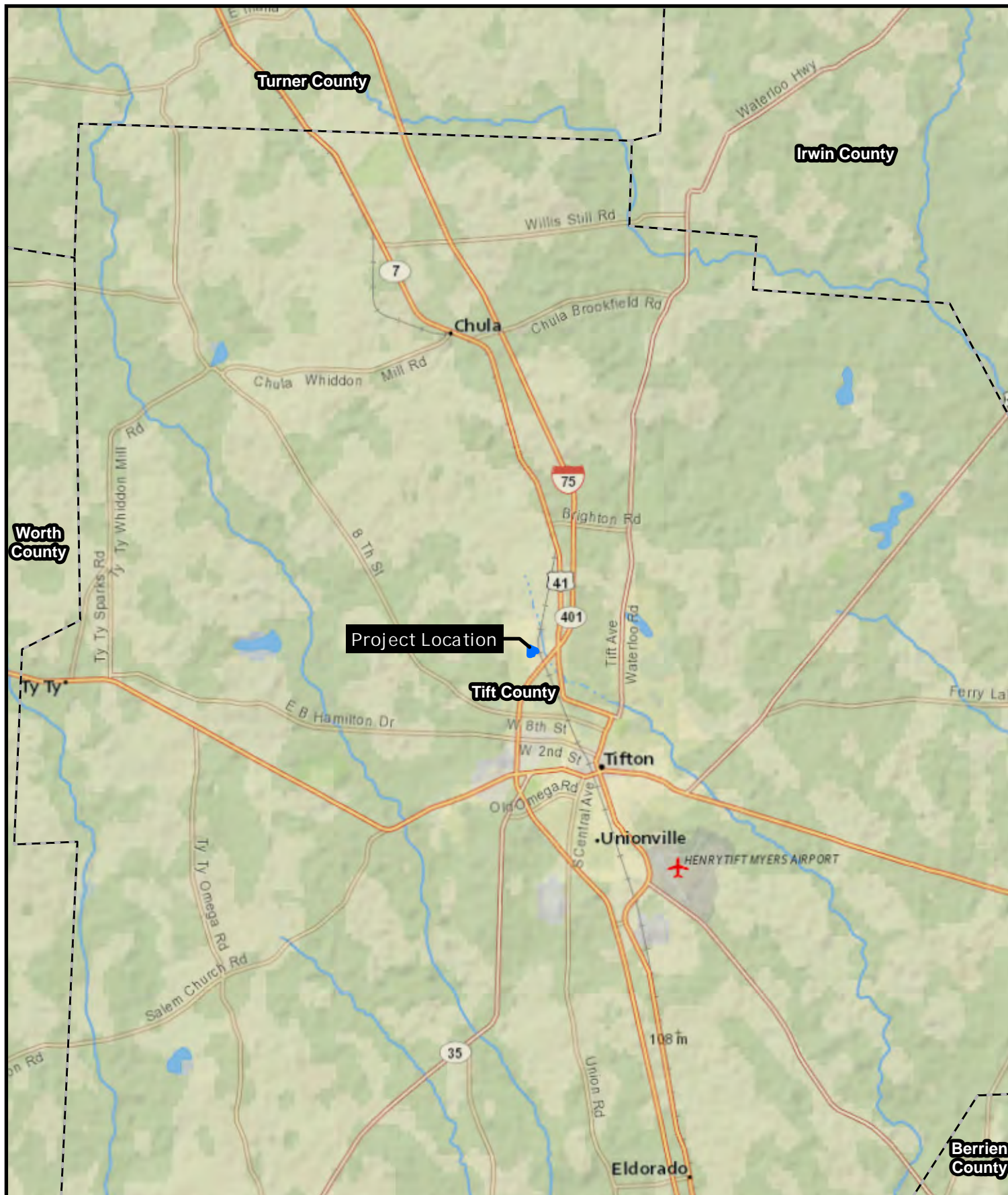
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Nicholas Girken  
Date: 2021.09.03  
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cc: Shauna Stotler/USACE

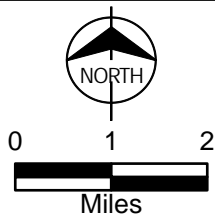
Appendix A: Project Maps

## **APPENDIX A -PROJECT MAPS**





- Site Boundary
- County Boundary



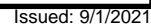
BURNS  
MCDONNELL

## General Vicinity Map

### USDA-ARS Laboratory Modernization Project

### Tifton, Georgia









August 31, 2021

Mr. Ted Will  
Director  
Wildlife Resources Division  
Georgia Department of Natural Resources  
2070 U.S. Hwy. 278 SE  
Social Circle, GA 30025

Re: U.S. Department of Agriculture  
U.S. Department of Agriculture-Agricultural Research Service Laboratory Modernization  
Project, Tifton, GA.

Dear Mr. Will:

U.S. Department of Agriculture's Agriculture Research Service (USDA-ARS) is conducting scoping as part of the preparation of an Environmental Assessment (EA) in accordance with the National Environmental Policy Act (NEPA), for the USDA-ARS Laboratory Modernization Project (Project) at USDA-ARS's Tifton Laboratory Campus in Tifton, Georgia. The U.S. Army Corps of Engineers (USACE) Savannah District is supporting USDA-ARS by providing technical services for the Project.

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Sincerely,

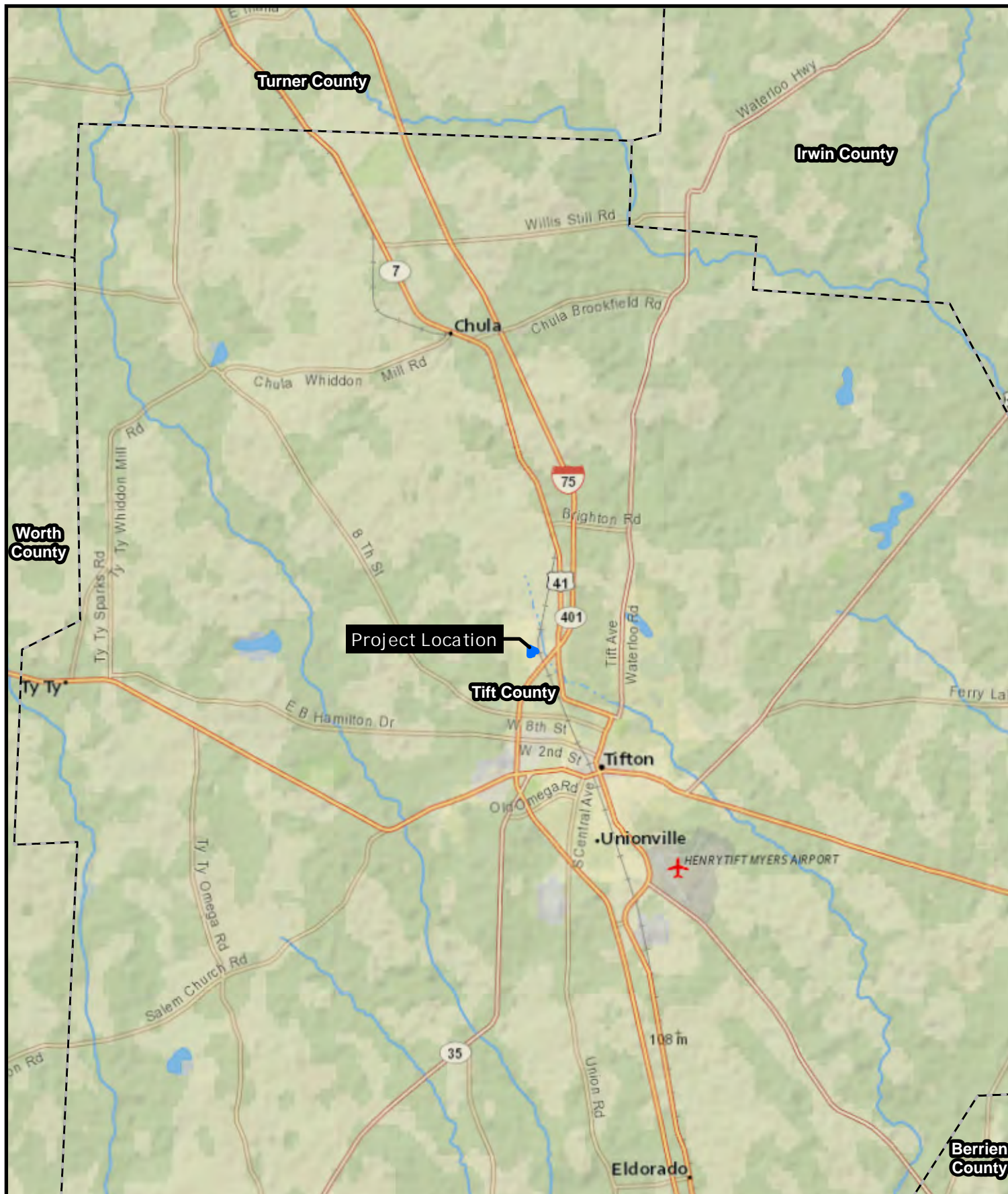
Nicholas Girken  
USDA, Project Manager

**Nicholas  
Girken**  Digitally signed by  
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Date: 2021.09.03  
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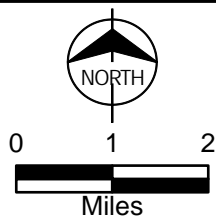
cc: Shauna Stotler/USACE

Appendix A: Project Maps

## **APPENDIX A -PROJECT MAPS**



- Site Boundary
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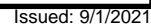
**BURNS  
MCDONNELL**

## General Vicinity Map

### USDA-ARS Laboratory Modernization Project

### Tifton, Georgia







August 31, 2021

Dr. David Crass  
Historic Preservation Division Director  
Georgia State Historic Preservation Office  
60 Executive Park NE  
Atlanta, GA 30329

Re: U.S. Department of Agriculture  
U.S. Department of Agriculture-Agricultural Research Service Laboratory Modernization  
Project, Tifton, GA.

Dear Dr. Crass:

U.S. Department of Agriculture's Agriculture Research Service (USDA-ARS) is conducting scoping as part of the preparation of an Environmental Assessment (EA) in accordance with the National Environmental Policy Act (NEPA), for the USDA-ARS Laboratory Modernization Project (Project) at USDA-ARS's Tifton Laboratory Campus in Tifton, Georgia. The U.S. Army Corps of Engineers (USACE) Savannah District is supporting USDA-ARS by providing technical services for the Project.

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Sincerely,

Nicholas Girken  
USDA, Project Manager

Nicholas  
Girken



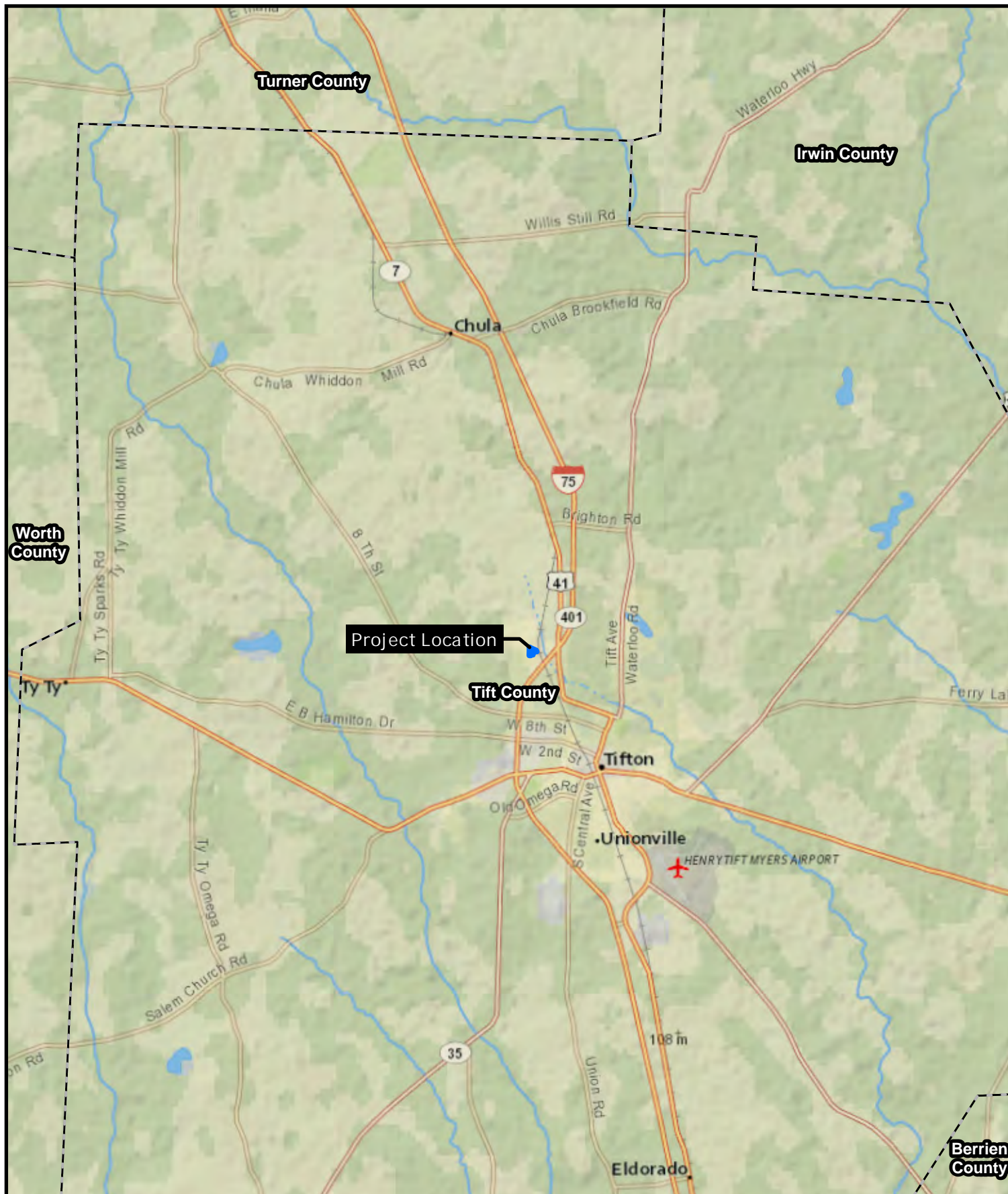
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Date: 2021.09.03  
12:59:07 -04'00'

cc: Shauna Stotler/USACE

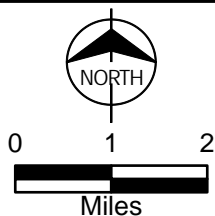
Appendix A: Project Maps

## **APPENDIX A -PROJECT MAPS**





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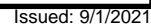
**BURNS  
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## General Vicinity Map

### USDA-ARS Laboratory Modernization Project

### Tifton, Georgia







August 31, 2021

Mr. Deron Davis  
Executive Director  
The Nature Conservancy  
50 Hurt Plaza SE, Suite 1100  
Atlanta, GA 30303

Re: U.S. Department of Agriculture  
U.S. Department of Agriculture-Agricultural Research Service Laboratory Modernization  
Project, Tifton, GA.

Dear Mr. Davis:

U.S. Department of Agriculture's Agriculture Research Service (USDA-ARS) is conducting scoping as part of the preparation of an Environmental Assessment (EA) in accordance with the National Environmental Policy Act (NEPA), for the USDA-ARS Laboratory Modernization Project (Project) at USDA-ARS's Tifton Laboratory Campus in Tifton, Georgia. The U.S. Army Corps of Engineers (USACE) Savannah District is supporting USDA-ARS by providing technical services for the Project.

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Sincerely,

Nicholas Girken  
USDA, Project Manager

Nicholas  
Girken

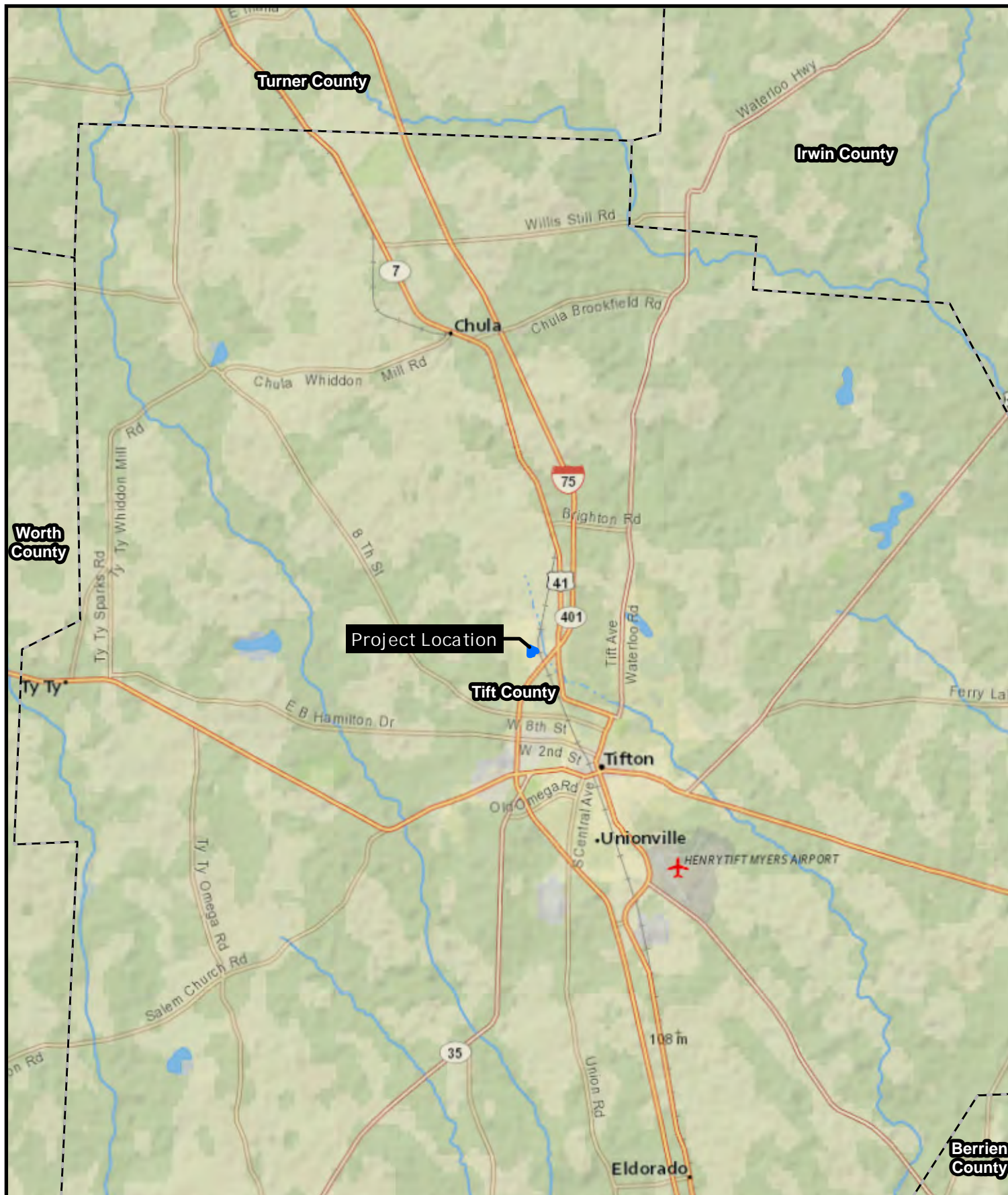
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Nicholas Girken  
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-04'00'

cc: Shauna Stotler/USACE

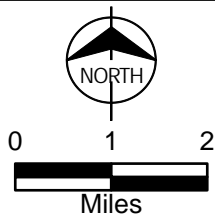
Appendix A: Project Maps

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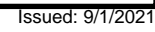
**BURNS  
MCDONNELL**

## General Vicinity Map

### USDA-ARS Laboratory Modernization Project

### Tifton, Georgia







August 31, 2021

Mr. Don Imm  
Field Supervisor  
U.S. Fish and Wildlife Service  
2 MLK JR Drive SE  
Atlanta, GA 300334

Re: U.S. Department of Agriculture  
U.S. Department of Agriculture-Agricultural Research Service Laboratory Modernization  
Project, Tifton, GA.

Dear Mr. Imm:

U.S. Department of Agriculture's Agriculture Research Service (USDA-ARS) is conducting scoping as part of the preparation of an Environmental Assessment (EA) in accordance with the National Environmental Policy Act (NEPA), for the USDA-ARS Laboratory Modernization Project (Project) at USDA-ARS's Tifton Laboratory Campus in Tifton, Georgia. The U.S. Army Corps of Engineers (USACE) Savannah District is supporting USDA-ARS by providing technical services for the Project.

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Nicholas Girken  
USDA, Project Manager

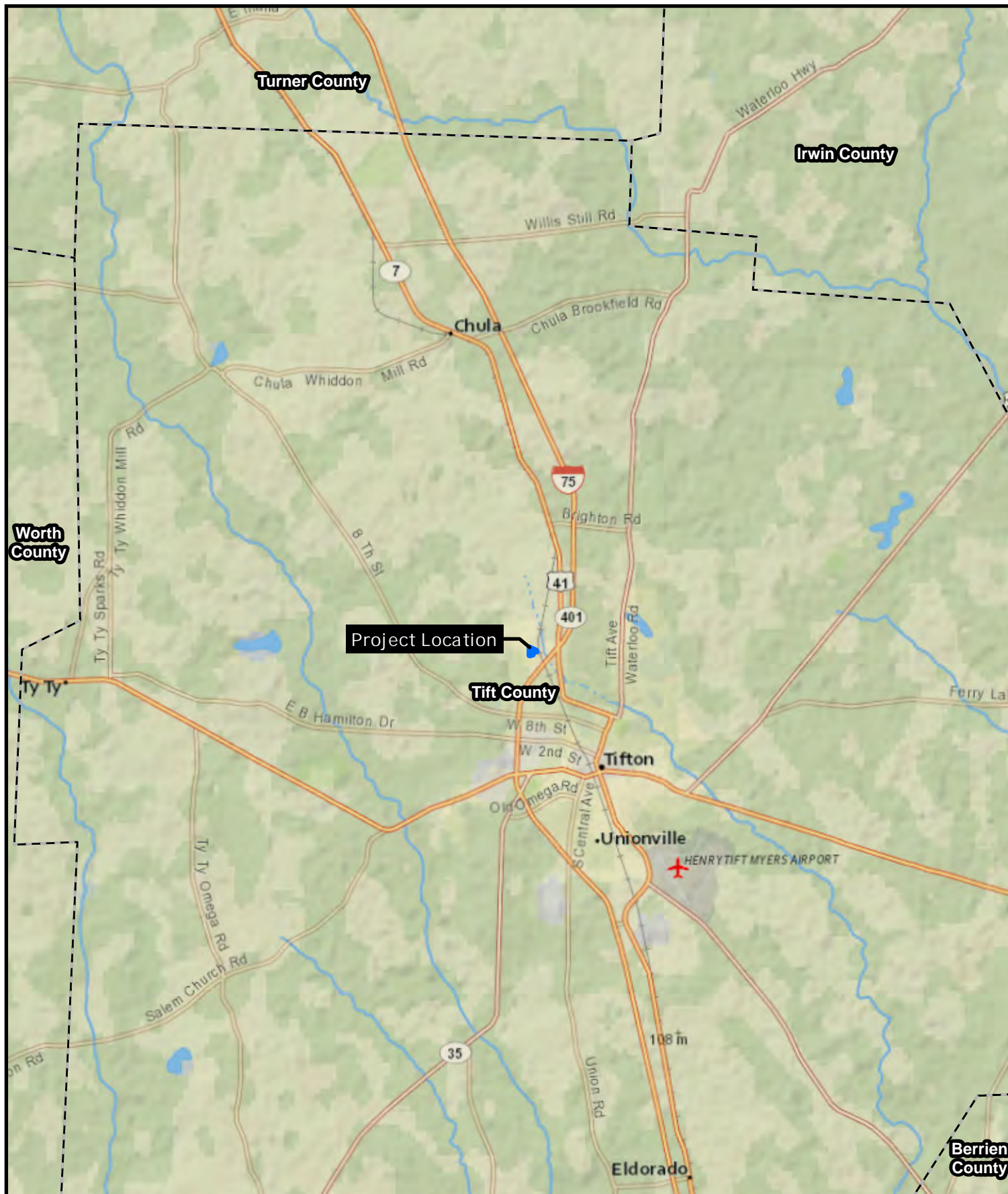
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Girken

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Date: 2021.09.03  
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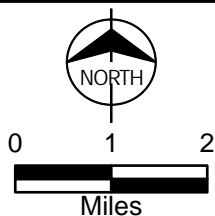
cc: Shauna Stotler/USACE

Appendix A: Project Maps

## **APPENDIX A -PROJECT MAPS**



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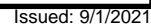
BURNS  
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## General Vicinity Map

### USDA-ARS Laboratory Modernization Project

### Tifton, Georgia





## **APPENDIX B – SECTION 106 CONSULTATION**



August 31, 2021

Dr. David Crass  
Historic Preservation Division Director  
Georgia State Historic Preservation Office  
60 Executive Park NE  
Atlanta, GA 30329

Re: U.S. Department of Agriculture  
U.S. Department of Agriculture-Agricultural Research Service Laboratory Modernization  
Project, Tifton, GA.

Dear Dr. Crass:

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Sincerely,

Nicholas Girken  
USDA, Project Manager

cc: Shauna Stotler/USACE

Appendix A: Project Maps



October 6, 2021

Nicholas Girken  
Project Manager  
U.S. Department of Agriculture – Office of the Administrator  
Jamie L. Whitten Federal Building, Room 302-A  
1400 Independence Avenue SW  
Washington, D.C. 20250

**RE: USDA-ARS Laboratory Modernization Project, Davis Road, Tifton  
Tift County, Georgia  
HP-210910-003**

Dear Mr. Girken:

The Historic Preservation Division (HPD) has received initial information concerning the above referenced project requesting comments pursuant to the National Environmental Policy Act of 1969 (NEPA). Our comments are offered to assist the U.S. Department of Agriculture (USDA), Agriculture Research Service (ARS) in complying with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA).


Thank you for notifying us of this federal undertaking. We look forward to receiving Section 106 compliance documentation, as appropriate. Section 106 documentation should include:

1. An eligibility assessment of the USDA-ARS Tifton Laboratory Campus, including discussion of its relationship and possible integration into the previously determined National Register of Historic Places (NRHP)-eligible University of Georgia Tifton campus.
2. Project plans that include elevation drawings, site and landscape plans, and a description of proposed exterior materials for the new construction. Project plans that include detailed descriptions of proposed work, existing and proposed floorplans (if applicable), and description of proposed interior and exterior materials as applicable, for the rehabilitation portions of the project.
3. Current photographs, keyed to a map, of the existing buildings within the USDA-ARS Tifton Laboratory Campus, particularly those subject to project activities. For the remodeling activities, please include interior photographs, keyed to a floorplan, of areas where work will be occurring.
4. Potential for archaeological impacts, including previous surveys/results, potential for buried cultural resources in the project area, and proposed ground disturbance information.

If the federal agency intends to utilize NEPA to comply with Section 106, in lieu of the procedures set forth in 36 CFR Part 800, the USDA-ARS should notify HPD and the Advisory Council on Historic Preservation of its intent.

Please refer to project number **HP-210910-003** in future correspondence regarding this project. If we may be of further assistance, please contact Santiago Martinez, Environmental Review Historian, at (404) 486-6425 or [Santiago.Martinez@dca.ga.gov](mailto:Santiago.Martinez@dca.ga.gov).

Sincerely,



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

JAD/sdm  
cc: Sara Kent, Burns & McDonnell



**From:** [Harris, Brandy M](#)  
**To:** [Harris, Brandy M](#)  
**Subject:** RE: USDA-ARS Laboratory Modernization Project, Davis Road, Tifton HP-210910-003 Response  
**Date:** Friday, January 7, 2022 8:26:04 AM

---

**From:** Santiago D. Martinez <[Santiago.Martinez@dca.ga.gov](mailto:Santiago.Martinez@dca.ga.gov)>  
**Sent:** Friday, October 22, 2021 2:15 PM  
**To:** Kent, Sara S <[sskent@burnsmcd.com](mailto:sskent@burnsmcd.com)>  
**Cc:** Girken, Nicholas - REE-ARS-CEC, Beltsville, MD <[nicholas.girken@usda.gov](mailto:nicholas.girken@usda.gov)>; Stotler, Shauna L CIV (USA) <[Shauna.Stotler@usace.army.mil](mailto:Shauna.Stotler@usace.army.mil)>; King, William R <[wrking@burnsmcd.com](mailto:wrking@burnsmcd.com)>; Henson, Kent <[khenson@burnsmcd.com](mailto:khenson@burnsmcd.com)>  
**Subject:** Re: USDA-ARS Laboratory Modernization Project, Davis Road, Tifton HP-210910-003 Response

Sara and others,

Good afternoon, thank you for getting this to me. Unfortunately, it appears there was a mistake on my end: instead of sending out our response letter, I accidentally sent out my review notes! The file names are very similar, so apparently, I got them mixed up - my apologies!

In any case, I have attached our response letter to this email. Fortunately, it looks like you were able to make pretty good sense of what I had sent and get us most of what we need to complete the review. I hate to ask given the circumstances, but if you could please gather the remaining items (see discussion below), it would be greatly appreciated.

For Item 1, this would just be an eligibility assessment of the lab campus as a whole, including which buildings are contributing or non-contributing. As I'm sure you noticed in my notes, information was a little hard to come by. It would seem that this campus likely has eligibility potential under Criterion A, and possibly C.

Item 2 appears to be covered in this email.

Item 3 is mostly covered, although a photo key would be very helpful. Additionally, even though no exterior alterations are proposed, it would be beneficial to have some exterior photos of the building, although these could be incorporated into Item 1.

Since the scope of work has changed to interior renovations of Building 1 only, it appears there will no longer be any ground disturbance, and thus, no potential to impact any archaeological resources. If you could just confirm that this understanding is correct, then Item 4 should be covered.

Again, my apologies for the mix up and for having to ask for the remaining items! Please let

me know if you have any questions for HPD and have a good weekend!

Best regards,

Santiago Martinez

Environmental Review Historian

Environmental Review & Preservation Planning

**Historic Preservation Division/Georgia DCA**

(404) 486-6425 | 60 Executive Park South, NE Atlanta, GA 30329

**Santiago D. Martinez**

Environmental Review Historian

Georgia Department of Community Affairs

Direct [4044866425](tel:4044866425)

[Santiago.Martinez@dca.ga.gov](mailto:Santiago.Martinez@dca.ga.gov)



---

**From:** Kent, Sara S <[sskent@burnsmcd.com](mailto:sskent@burnsmcd.com)>

**Sent:** Friday, October 22, 2021 12:48 PM

**To:** Santiago D. Martinez <[Santiago.Martinez@dca.ga.gov](mailto:Santiago.Martinez@dca.ga.gov)>

**Cc:** Girken, Nicholas - REE-ARS-CEC, Beltsville, MD <[Nicholas.Girken@usda.gov](mailto:Nicholas.Girken@usda.gov)>; Stotler, Shauna L CIV (USA) <[Shauna.Stotler@usace.army.mil](mailto:Shauna.Stotler@usace.army.mil)>; King, William R <[wrking@burnsmcd.com](mailto:wrking@burnsmcd.com)>; Henson, Kent <[khenson@burnsmcd.com](mailto:khenson@burnsmcd.com)>

**Subject:** RE: USDA-ARS Laboratory Modernization Project, Davis Road, Tifton HP-210910-003 Response

Hello Mr. Martinez,

I am following up to provide information on the USDA-ARS Laboratory Modernization Project, Davis Road, Tifton HP-210910-003 project. Due to funding and budget constraints, the USDA-ARS has narrowed the scope of work to include renovations to Building 1 as detailed below and attached. No additional renovations or demolitions are proposed for the Buildings noted in red as likely historic in the attached PDF response.

#### **Building 1**

- Constructed in 1962
- Renovated in 1978 to replace the boiler
- Renovated again in 1989, including new lights/ceiling, HVAC, and plumbing
- The proposed 2022 renovation will include replacing the ceiling tiles, installing new lights, and replacing the HVAC system and duct work. The ceiling and lights will be similar in appearance to the existing. Additionally, 4 non-load bearing walls will be demolished. No exterior changes are proposed.

Interior photos of Building 1, including the existing ceiling tiles, lighting, and the 4 walls proposed for demolition are attached for your review.

- The proposed new lighting information is also attached
- Lastly, I've attached a floorplan showing the location of the 4 walls proposed for demolition (highlighted in yellow)

Please let us know if you have any additional questions or need any additional information about the project. We appreciate your response. Thanks!

**Sara Kent \ Burns & McDonnell**

Project Manager, Environmental Services

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**\*\*\*Please note my new office address**

---

**From:** ER <[er@dca.ga.gov](mailto:er@dca.ga.gov)>

**Sent:** Wednesday, October 6, 2021 12:05 PM

**To:** [nicholas.girken@usda.gov](mailto:nicholas.girken@usda.gov)

**Cc:** Kent, Sara S <[sskent@burnsmcd.com](mailto:sskent@burnsmcd.com)>

**Subject:** USDA-ARS Laboratory Modernization Project, Davis Road, Tifton HP-210910-003 Response

From: Historic Preservation Division

Attached is our letter on the subject undertaking (in Adobe Acrobat PDF format)

**Do not respond to this e-mail.**

If you have any questions concerning our letter, please contact:

Santi Martinez at [santiago.martinez@dca.ga.gov](mailto:santiago.martinez@dca.ga.gov).

A free copy of Adobe Acrobat Reader can be downloaded from: [www.adobe.com](http://www.adobe.com)



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**ER**

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January 13, 2022

Santiago Martinez  
Environmental Review Historian  
Historic Preservation Division  
Georgia Department of Community Affairs  
60 Executive Park South, NE  
Atlanta, GA 30329

Re: USDA-ARS Laboratory Modernization Project, Davis Road, Tifton HP-210910-003

Dear Mr. Martinez:

This memorandum provides the additional information requested by your office on October 6, 2021 for the proposed U.S. Department of Agriculture - Agricultural Research Service (USDA-ARS) Laboratory Modernization Project (Project) on 262 Davis Road, Tifton, Tift County, Georgia; UTM Zone 17N, Easting 260,009, Northing 3,485,333; Tax Parcel ID T013 001, (Attachment A; Attachment B: Figure B-1). The proposed federal undertaking requires compliance with Section 106 of the National Historic Preservation Act. This memorandum provides a National Register of Historic Places (NRHP) eligibility and effects assessment for the USDA-ARS Tifton Campus and an assessment of the potential for archaeological impacts in association with the proposed undertaking conducted by a Secretary of the Interior (SOI)-qualified architectural historian and archaeologist. Relevant maps and figures are included in Attachment B. Attachment C provides current photographs of the existing buildings comprising the campus. Attachment D contains additional contextual and setting photographs of the campus, and Attachment E includes interior photographs of Building 001 (B001) with a map key.

## INTRODUCTION

The 5.25-acre USDA-ARS Tifton Campus (Project Boundary) supports the Southeast Watershed Research Unit (SEWRU) and the Crop Genetics and Breeding Research Unit (CGBRU) research facilities. When SEWRU was established in 1966, its mission was to “identify and characterize the elements that control flow of water from watersheds in the southeastern U.S. to provide information for better management of water resources on those watersheds” (Thomas 1993). SEWRU's water resources research has expanded to include systems research on the feedbacks between agricultural practices, environmental conditions, pest management, and the role water plays in linking these components of agricultural systems. CGBRU conducts research to improve breeding methods and plant genetics for improved crop yields, enhanced environmental quality, and pest management strategies. Research is conducted on warm season grasses (forage and turf), corn, peanuts, and sorghum (Butler et al. 1993). The USDA-ARS Tifton Administrative Officer and staff serve both the SEWRU and CGBRU, as well as the National Peanut Research Laboratory in Dawson, Georgia (Denby 1993).

The CGBRU and administrative staff occupy administrative and laboratory buildings on the USDA-ARS Tifton Campus and on the adjacent University of Georgia (UGA) campus. The USDA-ARS lease with UGA for these buildings expires in 2023. The USDA-ARS is proposing a consolidation and modernization project for the Tifton Campus. The Project would provide more laboratory and administrative space on the USDA-ARS Tifton Campus and would reduce the amount of leased space from UGA. The proposed Project would include demolishing outdated structures, constructing new



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buildings, renovating the largest laboratory building on the Tifton Campus (B001), and upgrading utility and roadway infrastructure (Attachment B: Figure B-2).

Extant buildings and structures associated with the campus vary in size, materials, and age. There are six one-story, brick masonry buildings on the USDA-ARS Tifton Campus constructed in the 1960s. In addition to buildings, there are 17 additional structures and equipment on site including storage sheds, mobile storage units, outdoor cold storage units, and greenhouses, which serve as agriculture research space, office space, and storage. The support structures were constructed between the 1960s and 2000s in response to the changing needs of the researchers.

## **PROJECT DESCRIPTION**

The proposed Project involves the following improvement, removal, and/or construction of new facilities to support the ongoing SEWRU and CGBRU missions (Attachment B: Figure B-2):

- Renovation of Building 001 – The one story, brick-masonry building containing research laboratories and office space was constructed in 1962 and renovated in 1978 to replace the boiler. The building was renovated again in 1982 to replace the ceiling tiles, lighting, and the heating, ventilation, and air conditioning (HVAC) system. The proposed 2022 renovation would include replacing the ceiling tiles, installing new lights, and replacing the HVAC system and ductwork. The ceiling and lights would be similar in appearance to the existing. Additionally, four non-load-bearing walls would be demolished to expand laboratory and office space. No exterior changes are proposed. Additional information regarding the proposed interior improvements to B001 is included in Attachment E.
- Realignment of the north-south roadway transecting the USDA-ARS Tifton Campus – Demolishing existing non-historic-age equipment (B091 and B092) would allow for a new entrance and realigned roadway through the USDA-ARS Tifton Campus. The realignment would eliminate blind corners and driving safety concerns while providing space to construct new buildings (Attachment B: Figure B-2).
- Construction of a new three-story laboratory building with connector to B001 – The existing laboratory space in B001 is inadequate to support the 11 additional Scientist Years (SY) that would relocate to the USDA-ARS Tifton Campus. A SY defines the number of scientists working at a facility. One SY includes a scientist, his/her support personnel, and limit of 3,000 gross square feet (GSF) of space. The new multi-story, modern laboratory facility would be constructed in the footprint of existing non-historic-age equipment (B091 and B092). The three-story laboratory building would be of steel frame construction with brick veneer and metal paneling, and a standing seam mono-sloped roof and would include several wet laboratory rooms, office space, and additional storage. The preliminary design is based on the nearby UGA Administrative Building (UGA 4601) that is of similar vintage and aesthetic character to B001. Preliminary renderings of the proposed laboratory building are included in Attachment B: Figures B-4.1 and B-4.2.



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- Construction of a new two-story support building – Existing storage space on the USDA-ARS Tifton Campus is also limited, and a new, multi-story support building would be constructed to house laboratory supplies and equipment. The support building would be constructed in the footprint of B091 and B092 and would be of steel frame and concrete masonry unit construction with a standing seam metal roof. It would house an overhead crane to bring equipment to the second-floor storage areas and would also include small field science processing areas. Preliminary exterior elevation drawings of the proposed support building are included in Attachment B; Figure B-4.3.
- Construct new parking areas north and east of B001 and north of the new support building – Additional parking spaces would be required to support the proposed consolidation efforts. Additional new parking lots would be constructed in the maintained lawn/undeveloped spaces in the northern portion of the campus (Attachment B: Figure B-2).
- Two existing drying barns would be relocated, and several prefabricated drying barns would be acquired to consolidate all drying barns at the campus. Drying barns would be relocated to the southwest portion of the campus where B084 and B059 are currently located. B059 (Hazardous Material Waste Storage) would be relocated north of B002 where B089 and B093 are currently located. B089 and B093 are proposed for demolition (Attachment B: Figure B-2).

## **BACKGROUND REVIEW METHODS**

Cultural resources specialists conducted a background review to facilitate an NRHP eligibility assessment of the USDA-ARS Tifton Campus and an assessment of the potential for archaeological impacts in association with the proposed undertaking. The reviewed materials included archaeological site files and previous surveys from UGA's Georgia Archaeological Site File (GASF), historic resources (NRHP-listed and previously surveyed) included on Georgia's Natural, Archaeological, and Historic Resources GIS (GNAHRGIS), and sources detailing the history of the UGA Tifton campus and its agricultural research mission. These included relevant sections of the 2019 *University of Georgia Historic Preservation Master Plan* (Georgia Master Plan) (Wiss, Janney, Elstner Associates, Inc. et al. 2019), a survey report regarding Georgia's Agricultural Experiment Stations provided by the Georgia State Historic Preservation Office (SHPO) (Reed et al. 2015), *The UGA Coastal Plain Experiment Station...the First 75 Years* (Bass 1993), and oral history and background materials provided by USDA-ARS staff.

## **BACKGROUND REVIEW RESULTS**

Review of UGA's GASF data identified one archaeological site, 9TI63, within a one-mile Study Area (Attachment B: Figure B-3). The site is a historic artifact scatter associated with a former barn located on the UGA Coastal Plain Experiment Station and was recorded in 2012 by New South Associates during a Phase I Archaeological Survey of the UGA Tifton Building 4672. GASF did not provide the limits of this survey or an associated report. Site 9TI63 was recommended ineligible for NRHP inclusion on the site form provided by GASF. The site is not within the Project Boundary and would not be impacted by the proposed undertaking. Ten additional archaeological surveys have been previously conducted within the one-mile Study Area, but none intersect the Project Boundary (Table 1; Attachment B: Figure B-3). The remaining surveys were conducted primarily in support of Georgia Department of Transportation

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(GDOT) projects and did not identify any additional archaeological sites within the one-mile Study Area. No archaeological sites or previously recorded cultural resources are reported within the Project Boundary.

**Table 1: Previous Archaeological Surveys within 1 mile**

GASF ID	Year	Consultant	Sponsor	Project
-	2012	New South Associates	-	Phase I Archaeological Survey of the UGA Tifton Building 4672
2553	2002	Southwind Archaeological Enterprises	GDOT	Carpenter Road Improvements
3092	2003	Southwind Archaeological Enterprises	GDOT	Carpenter Road Improvements Addendum
8124	2014	GDOT	GDOT	I-75 Interchange Reconstruction at CR410/Brighton Road
8146	2012	Edwards-Pitman Environmental, Inc.	GDOT	Carpenter Road Improvements Addendum
9648	2007	GDOT	GDOT	SR 7 Resurfacing
10157	2003	GDOT	GDOT	Grading US 41/SR 7 at the SR 401/I-75 Southbound Entrance Ramp
10180	2017	Southeastern Archaeological Services, Inc.	UGA	University of Georgia; Tifton Campus Outparcel #5
10240	1985	GDOT	GDOT	I-75 Widening
11819	1983	GDOT	GDOT	Eight Street Widening
13301	1977	GDOT	GDOT	Central Street Widening

Source: GASF 2021

There are a number of previously-recorded, historic-age, non-archaeological resources within the one-mile Study Area; however, no individual resources are located in immediate proximity to the Project Boundary (Attachment B: Figure B-3). Review of the Georgia Master Plan indicates the USDA-ARS Tifton Campus is within the boundaries of an NRHP-eligible historic district comprising the entire UGA Tifton Campus, also known as UGA's Coastal Plain Experiment Station. Though within the district's boundaries, the subject buildings were not specifically assessed for NRHP eligibility or as contributing resources to the UGA Tifton Campus historic district during development of the Georgia Master Plan due to their ownership by the federal government. The historic district was identified as significant at the state level in the areas of Agriculture, Architecture, Education, Invention, and Science. Specifically, "[p]hysical evidence of the facilities used to advance the science and practice of agriculture survives throughout the campus, while the campus as a whole conveys patterns of organization, a road network, field patterns, and land uses that reflect important heritage values" (Wiss, Janney, Elstner Associates, Inc. et al. 2019). The district was identified as eligible under Criteria A and C with a period of significance extending from the college's founding in 1919 through 1966, the 50-year cutoff from the date of the

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plan's publication (Wiss, Janney, Elstner Associates, Inc. et al. 2019). The boundaries of the proposed district in relation to the Project are depicted on Figure B-3 in Attachment B.

## **NRHP ELIGIBILITY AND EFFECTS ASSESMENT OF THE USDA-ARS TIFTON CAMPUS**

The following sections contain historical background and descriptive information relevant to the NRHP eligibility evaluation of the buildings comprising the USDA-ARS Tifton Campus and includes an assessment of the Project's potential to adversely effect historic (NRHP-listed or eligible) buildings under Section 106.

### **Architectural Documentation and Assessment Methods**

Field methods for the investigation followed the *Georgia Historic Resources Survey Manual* (2020) guidelines as well as approved methods outlined in a meeting with SHPO staff on November 2, 2021. During the field survey effort, surveyors sought to document all buildings, structures, objects, districts, etc. constructed in or prior to 1976 (45 years of age or older) within the Project Area. All resources within the Project Area were photo-documented and their locations recorded for further assessment by the Project's Secretary of the Interior (SOI)-qualified Architectural History Principal Investigator.

Preliminary NRHP eligibility assessments were based on the SOI standards for identification and evaluation of historic resources, including the 50-year-age criterion and assessment of integrity (design, materials, workmanship, feeling, location, setting, and association) and significance with regard to design or association with recognized historic contexts or significant individuals. In addition to the general 50-year-age criterion (45-year-age criterion for the current Project to account for potential delays in Project letting), NRHP eligibility requires a resource to meet at least one of four primary criteria for significance and to retain sufficient physical integrity (Advisory Council on Historic Preservation 35 CFR 800 2004). More specifically, the criteria state that historic-age resources may qualify for NRHP consideration if they meet one or more of the following Criteria for Evaluation:

- A. Association with events that have made a significant contribution to the broad patterns of our history;
- B. Association with the lives of significant persons of the past;
- C. Embodiment of the distinctive characteristics of 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; and/or
- D. May have yielded or may be likely to yield information important in history or prehistory.

These criteria, along with NRHP Criteria Considerations for religious properties (A), relocated resources (B), birthplaces or graves of historic figures (C), cemeteries (D), reconstructed buildings (E), commemorative properties (F), and properties that have achieved significance within the last 50 years (G), served as the basis for preliminary NRHP eligibility recommendations presented herein.

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### **Summary USDA-ARS Tifton Campus History**

The USDA-ARS Tifton Campus contains a group of buildings, structures, and equipment constructed between 1962 and the 2000s (see relevant photographs in Attachments C, D, and E). The core of the historic-age portion of the campus includes the main laboratory building (B001) and supporting facilities, such as greenhouses, warehouses, and chemical storage buildings (B002, B003, B004, B007, B008, B013, and B015), constructed between 1962 and the mid-1970s (Attachment B: Figure B-5.1; Attachment C). The historic-age resources are primarily associated with plant and insect research overseen by the SEWRU. Resources B089 and B093 represent portable prefabricated drying houses constructed in the mid- to late-1970s (Attachment B: Figure B-5.1; Attachment C: Photographs C-37 and C-41). The remaining buildings, structures, and equipment associated with the campus postdate the historic period and were constructed to replace outdated or obsolete building stock and to support the evolving needs of the research scientists as farm practices and technology changed during the late-twentieth century.

The remnant historic-age buildings are all of utilitarian and functional design and have undergone alterations over the years to keep them viable. Most have experienced replacement materials, including windows, cladding, and overhead doors. Others have experienced additions or other significant footprint alterations (i.e., B002; Attachment C: Photographs C-9 through C-14), detracting from their overall integrity of design, materials, and workmanship. Despite alterations and non-historic-age infill, the complex maintains associations with defined historic contexts relevant to the surrounding NRHP-eligible UGA Tifton Historic District. The core historic-age resources on the USDA-ARS Tifton campus were constructed during a corresponding building boom at UGA during the 1950s and 1960s that included both “large permanent buildings...as well as smaller ones such as corn cribs and other specialized crop-related storage and processing facilities and greenhouses” (Wiss, Janney, Elstner Associates, Inc. et al. 2019).

Development of the USDA-ARS Tifton Campus was related to federal policies, specifically, Senate Resolution 48, issued in April 1959. The resolution established the Select Committee on National Water Resources and authorized

exhaustive studies of the extent to which water resources activities in the United States are related to the national interest, and the extent and character of water resources activities, both governmental and non-governmental...to provide the quantity and quality of water for use by the population, agriculture, and industry between the present time and 1980...to the end that such studies and the recommendations based thereon may be available to the Senate in considering water resources policies for the future” (Schad 1962).

The government recognized the lack of federal oversight and attention to water resources and the need to identify important water development projects that would meet growing demand. The committee sought to determine how much water development was needed, when and where it was required, and what level of costs would be justified to meet national needs. The information was intended to guide future water policy. It involved a great statistical effort on the part of various federal agencies to determine current consumption, future needs, and priorities. The USDA-ARS was involved directly in this effort, and it was during this period that the SEWRU relocated to the USDA-ARS Tifton Campus to participate in regional research efforts authorized under this resolution (Schad 1962; Strickland 2021).

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In addition to associations with federal initiatives, the USDA-ARS Tifton Campus has always been intertwined with the research missions of the UGA Tifton Campus. This cooperation was not mandated, but voluntary because both entities want to make the best use of available research funding and cooperate on projects that would be beneficial to the region. For this reason, USDA-ARS and UGA have continued to work together with USDA-ARS supporting post-graduate research and partnering with UGA researchers on various projects (Strickland 2021).

The historic-age resources at the USDA-ARS Tifton Campus thus fit under the contexts “Growth of the Coastal Plain Experiment Station Following World War II (1946-1970)” and “Establishment of the Contemporary Coastal Plain Experiment Station (1971-2016)” as outlined in the Georgia Master Plan. At the UGA Tifton Campus, turf research became “Tifton’s leading research and development product” during the period beginning in 1946 and continues to be a main research focus of the USDA-ARS Tifton Campus (Wiss, Janney, Elstner Associates, Inc. et al. 2019). Though the administrative units assigned to the facility and the specific research missions have changed over time, researchers at USDA-ARS have always been involved in turf research and in the development of new crop varieties better adapted to higher production and disease resistance (Strickland 2021). Figures B-7.1 through B-7.3 in Attachment B show the development of the USDA-ARS Tifton Campus overtime in relation to the adjacent UGA Tifton Campus.

The main laboratory (B001), service shop (B002), and headhouse/greenhouse facility (B003) were all constructed in 1962 (Attachment C: Photographs C-1 through C-17), during the same period significant permanent buildings were constructed on the UGA Tifton Campus, including a large Administration Building (UGA 4601), built in 1954, and the Horticulture Building (UGA 4604), built in 1963 (Wiss, Janney, Elstner Associates, Inc. et al. 2019) and located outside of the Project Boundary.

Funding to construct B001 was appropriated by the House Sub-committee on Agricultural Appropriations in 1959, and the building was dedicated in 1961 as the “Southern Grain Insects Research Laboratory” (Wiseman and Rogers 1993). The primary objectives of the lab were to develop new approaches for insect control, search for insect-resistant germplasm to use in crop improvement programs and to improve existing insect control measures. By 1964, additional units, such as the Small Grain Insects Research unit and the Pesticide Chemicals and Forage Insecticide Residue Investigations unit, were added to the campus, and in 1983, the building’s name changed to the “Insect Biology and Population Management Research Laboratory” (Wiseman and Rogers 1993). During this period, new research units included the Insect Migration Research Unit, the Plant Resistance/Germplasm Enhancement Research Unit, and the Insect Biology/Management Systems Research Unit. By the 1990s, major research avenues included Environmentally Compatible Pest Control Strategies with a stated goal of managing “pests by developing safe and environmentally sound alternatives to reduce reliance on classical chemical pesticides and, at the same time, ensure a safe high-quality stable supply of food and fiber” (Wiseman and Rogers 1993).

The UGA buildings constructed during the same period are similar in scale and character to the main laboratory building on the USDA-ARS Tifton Campus (B001), including masonry construction, the hipped roof line shared with the Administration Building (UGA 4601), and the ribbon windows common to the Horticulture Building (UGS 4604). The masonry cladding, hipped roof, and massed plan, linear form is also characteristic of B002 and B003 on the USDA-ARS Tifton Campus. Further, the USDA-

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ARS complex shares the “park-like” character that defines the rest of the UGA Tifton Campus in the associated Georgia Master Plan from publicly accessible vantage points (see contextual and setting photographs in Attachment D). Despite these similarities to the neighboring UGA Tifton Campus, the USDA-ARS Tifton Campus fronts Davis Road and a non-historic-age portion of the Abraham Baldwin Agricultural College campus (Appendix B: Figure B-5.1).

### **NRHP Assessment of the USDA-ARS Tifton Campus**

Though none of the buildings appear to qualify for individual NRHP listing, their associations with defined historic contexts and agricultural research endeavors and their overall aesthetic similarity to contributing features of the adjacent NRHP-eligible UGA Tifton Historic District, the permanent and recognizable historic-age components of the USDA Tifton Campus (B001, B002, B003, B004, B007, B008, B013, and B015) are recommended for NRHP inclusion as contributing resources to the district. The resources are significant under Criterion A in the areas of agriculture and education and under Criterion C as examples of purpose-driven, research-related architecture, more significant for their form, function, and place within the larger campus landscape than for their individual design or stylistic qualities.

Two additional historic-age resources, B089 and B093, are temporary prefabricated metal storage containers constructed between the 1970s and 1980s. They are not permanent or fixed parts of the landscape and were intended to be disposed of or relocated once their useful life expired. As a result, they are not recommended as contributing features of the recommended NRHP-eligible campus.

Table 2 provides additional information about the buildings on the USDA-ARS Tifton Campus, including NRHP-eligibility recommendations and assessment of potential Project effects. The buildings are depicted on Figure B-5.1 in Attachment B, photographs of the historic-age resources are included in Attachment C, additional contextual and setting photographs are in Attachment D, and interior views keyed to a floorplan of B001 are included in Attachment E.



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**Table 2: Buildings on USDA-ARS Tifton Campus**

Building	Building Purpose	Year Constructed	Proposed Action	Description of Proposed Action	NRHP Eligibility Recommendation	Effect Assessment
B001	Laboratories	1962	Renovate	Replace outdated infrastructure, including full HVAC replacement, ceiling and lighting replacement, main switchgear replacement, and minor interior renovations and demolition of non-load bearing walls.	Contributing (NRHP Criteria A and C)	No Adverse Effect
B002	Service Shop	1962	No Action	N/A	Contributing (NRHP Criteria A and C)	No Adverse Effect
B003	Headhouse and Greenhouses	1962	No Action	N/A	Contributing (NRHP Criteria A and C)	No Adverse Effect
B004	CPMRU Insect Rearing Annex	1965	No Action	N/A	Contributing (NRHP Criteria A and C)	No Adverse Effect
B006 (two buildings)	Warehouses	2002	No Action	N/A	Not Eligible/Non-Contributing	N/A
B007	Chemical Storage	1965	No Action	N/A	Contributing (NRHP Criteria A and C)	No Adverse Effect
B008	Laboratory/Insectary Field Lab	1965	No Action	N/A	Contributing (NRHP Criteria A and C)	No Adverse Effect
B013	Equipment Storage	1972	No Action	N/A	Contributing (NRHP Criteria A and C)	No Adverse Effect
B015	Insect Laboratory	1974	No Action	N/A	Contributing (NRHP Criteria A and C)	No Adverse Effect

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Building	Building Purpose	Year Constructed	Proposed Action	Description of Proposed Action	NRHP Eligibility Recommendation	Effect Assessment
B057	Auxiliary Building	Post-1993	No Action	N/A	Not Eligible/Non-Contributing	NA
B059	Hazardous Material Waste Storage	1980s	Demolish and reconstruct at new location	Location of new drying barns	Not Eligible/Non-Contributing	N/A
B066	Shed	1980s	No Action	N/A	Not Eligible/Non-Contributing	N/A
B084	Chemical Storage	1980s	Demolish and Reconstruct	Location of new drying barns. A new chemical storage building would be constructed adjacent to B002	Not Eligible/Non-Contributing	N/A
B089	Drying Barns	Post 1972	Demolish and Reconstruct	Location of new hazardous material waste storage building. New drying barns will be constructed where B084 and B059 are currently located.	Not Eligible/Non-Contributing	N/A
B091	Shed next to greenhouse	2000	Demolish and Reconstruct	Location of new Support Building, new Laboratory Building, and new roadway alignment	Not Eligible/Non-Contributing	N/A
B092	Hoop Houses	Post 1993	Demolish and Reconstruct	Location of new Support Building, new Laboratory Building, and new roadway alignment	Not Eligible/Non-Contributing	N/A

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Building	Building Purpose	Year Constructed	Proposed Action	Description of Proposed Action	NRHP Eligibility Recommendation	Effect Assessment
B093	Drying Barns	Post 1972	Demolish and Reconstruct	Location of new hazardous material waste storage building. New drying barns will be constructed where B084 and B059 are currently located.	Not Eligible/Non-Contributing	N/A
B094	Oil Storage	2000	No Action	N/A	Not Eligible/Non-Contributing	N/A

### Section 106 Effects Discussion

Physical effects are proposed to three historic-age components of the campus, including one recommended contributing resource (B001) and two that are recommended as non-contributing (B089 and B093). All improvements to B001 would be interior, with the exception of the replacement of a 1980s vintage HVAC system. The building comprises the main laboratory building at the USDA-ARS Tifton Campus and requires regular upgrades as research needs and technology changes. Proposed improvement include:

- Replacement of ceiling tiles and lights with new units similar in appearance
- Installation of a new HVAC system and replacement of the associated ductwork
- Demolition of four non-loadbearing walls to expand and increase efficiencies in office/laboratory areas

The building has already experienced a number of exterior alterations, such as replacement of the character-defining ribbon windows with vinyl units and addition of standing seam metal roof cladding, that detract from its integrity of materials, workmanship, and feeling (Attachment C: Photographs C-1 to C-8). Further, the interior of the facility has been modified over the years to facilitate changes in the research mission and staffing needs. None of the changes have rendered the building unable to contribute to the NRHP-eligible UGA Tifton Historic District. As a result, the current proposed renovations are anticipated to have no adverse effect to the resource or to the district under Section 106. Attachment E includes representative photographs of the ceiling tiles and light fixtures proposed for replacement, as well as of the walls proposed for demolition keyed to a floorplan of the building.

Two portable metal storage sheds of circa 1970s vintage (Resources B089 and B093) are proposed for demolition to accommodate relocation and consolidation of drying barns and other storage structures to the south end of the campus (Attachment C: Photographs C-37 and C-41). As the resources are not recommended as contributing features of the NRHP-eligible USDA Tifton Campus, their loss would not

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diminish the integrity of adjacent contributing buildings. Therefore, their removal is anticipated to have no adverse effect. The other buildings proposed for demolition (B091 and B092) are not historic-age.

Other elements of the Project requiring consideration under Section 106 include:

- Realignment of the north-south roadway transecting the USDA-ARS Tifton Campus and construction of a new entrance
- Construction of new three-story laboratory building with connector to B001 and an associated two-story support building
- Construction of new parking areas east of B001 and north of the proposed support building

Realignment of the north-south road would require demolition of two non-historic-age structures; however, it would not dramatically change the existing circulation pattern of the campus, nor would the new roadway differ significantly in size, scale, or materials from the extant entry drive. As a result, this action is not anticipated to have an adverse effect on the USDA-ARS Tifton Campus or on any of the recommended contributing resources.

Similarly, construction of the new laboratory and support buildings would not diminish any of the characteristics that qualify the contributing resources on the USDA-ARS Tifton Campus for NRHP inclusion. The buildings would be similar in massing, size, and scale to the current building stock and include architectural features compatible with the recommended contributing resources on the campus. The current proposed design of the laboratory building is generally based off the appearance of the nearby UGA Administration Building (UGA 4601), built in 1954. It will feature masonry cladding, multilight metal sash windows, and a massed, linear plan in line with the institutional character of extant B001 (Attachment B: Figures B-4.1 and B-4.2). The support building would be of utilitarian design, similar to other warehouse and storage facilities already on site. Neither resource would alter the educational and institutional character of the complex, obscure, damage, or destroy character-defining features of contributing buildings on the campus, or dramatically affect existing spatial relationships among the extant buildings and structures. Further, they are located at the northern part of the campus, which fronts Davis Road and the non-historic-age Abraham Baldwin Agricultural College campus. As a result, construction of the proposed new buildings would not adversely affect the recommended contributing resources under Section 106.

Finally, expansion and construction of new parking areas would not introduce any visual changes or require significant modifications to the existing landscape. As a result, no adverse effects to historic (NRHP-eligible) buildings are anticipated as a result of this activity. The potential for impacts to archaeological resources from the proposed Project is discussed in the following section.

## **ARCHAEOLOGICAL POTENTIAL**

In addition to the review of archaeological site files and previous surveys from UGA's GASF discussed above, Burns & McDonnell's SOI-qualified archaeologist Shelly Wunderlich reviewed the Soil Web supplied by the Natural Resources Conservation Service and historic-age maps and aerials provided by the U.S. Geological Survey (USGS) Historic Topographic Map Explorer and the University of Georgia

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online Galileo Library. These sources were examined to assess the potential for previously unrecorded cultural resources within areas potentially subject to ground disturbing activities.

Soils within the Project Boundary are mapped as Tifton-Urban land complex (NRCS 2021). Tifton series soils formed in loamy marine sediments on the coastal plain. A typical profile consists of 30 centimeters (cm) of dark grayish brown loamy sand overlying strong brown sandy clay (NCSS 2017). Archaeological deposits, if present, are unlikely to be deeply buried. The Project is located on a ridge approximately 300 meters (m) and 600 m from two ephemeral tributaries of the Little River. This landform has moderate potential for prehistoric archaeological sites. However, given that the Project Boundary is previously developed and largely paved, it is unlikely to yield significant or intact archaeological features or artifacts.

A review of a recent topographic survey of the campus, as well as the photographs taken during documentation of the buildings, demonstrate the wooded portion of the Project Boundary where new parking areas are proposed contains a sidewalk, a buried communications line, and an overhead electric line (Attachment B: Figure B-5.2; Attachment D: Photograph D-8 and D-10). Few historic age-maps of an appropriate scale to show historic development of the Project Boundary were available. A 1910 soils survey map does not depict any buildings within the Project Boundary (Attachment B: Figure B-6) (Britton 1910). Aerial photographs from 1937 and 1948 also show that the wooded portion of the Project Boundary where new parking areas are proposed was once cleared, and the entire Project Boundary appears to be under cultivation (Attachment B: Figure B-7.1). Overall, the Project Boundary has low potential for historic-age archaeological resources pre-dating the construction of the USDA-ARS Tifton Campus. Because of the documented previous disturbances, an archaeological survey is not recommended.

## **SUMMARY RECOMMENDATIONS**

By submittal of this supplemental information, Burns & McDonnell, on behalf of USDA-ARS, requests your concurrence with the NRHP eligibility and effects recommendations presented herein. Further, USDA-ARS feels that archaeological investigations in support of the Project are not warranted. Please reach out to me directly with any additional questions or information needs at [bmharris@burnsmcd.com](mailto:bmharris@burnsmcd.com) or 512-558-2884.

Sincerely,

A handwritten signature in black ink, appearing to read "Brandy Harris", with a stylized flourish at the end.

Brandy Harris  
Sr. Cultural Resources Specialist

Attachments:

Attachment A - SHPO Correspondence



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Georgia Department of Community Affairs  
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Attachment B - Figures  
Attachment C - Resource Photographs  
Attachment D - Contextual Photographs  
Attachment E - Building 001 Additional Documentation

cc: Nick Girken, USDA-ARS  
Shauna Stotler, USACE  
Sara Kent, Burns & McDonnell  
William King, Burns & McDonnell



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Page 15

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**ATTACHMENT A - SHPO CORRESPONDENCE**



August 31, 2021

Dr. David Crass  
Historic Preservation Division Director  
Georgia State Historic Preservation Office  
60 Executive Park NE  
Atlanta, GA 30329

Re: U.S. Department of Agriculture  
U.S. Department of Agriculture-Agricultural Research Service Laboratory Modernization  
Project, Tifton, GA.

Dear Dr. Crass:

U.S. Department of Agriculture's Agriculture Research Service (USDA-ARS) is conducting scoping as part of the preparation of an Environmental Assessment (EA) in accordance with the National Environmental Policy Act (NEPA), for the USDA-ARS Laboratory Modernization Project (Project) at USDA-ARS's Tifton Laboratory Campus in Tifton, Georgia. The U.S. Army Corps of Engineers (USACE) Savannah District is supporting USDA-ARS by providing technical services for the Project.

USDA-ARS is proposing the modernization of the ARS Tifton Laboratory Campus in Tifton, GA. The Project would include the relocation and/or consolidation of the Southwest Watershed Research Unit and the Crop Genetics and Breeding Research Unit from the University of Georgia campus to the USDA-ARS Tifton Campus. The Project includes demolition of existing structures, remodeling of existing structures, construction of two new laboratory and office buildings, construction and expansion of new and existing parking lots, and utility infrastructure upgrades.

USDA-ARS is requesting information from your agency regarding the resources that should be included and discussed in the EA. A General Vicinity Map and a Project Site Plan Map are enclosed for your reference. Your input or information regarding any of the following resources is appreciated:

- Land use
- Aesthetics
- Water quality, streams/wetlands, groundwater, surface water, and stormwater
- Topography, soils and geology
- Prime Farmland
- Wildlife, vegetation and fisheries, including threatened and endangered species
- Socioeconomics (population, employment, growth, development)
- Hazardous and toxic materials and wastes
- Cultural resources (historic and archaeological sites, cemeteries)

Office of the Administrator  
Jamie L. Whitten Federal Building, Room 302-A  
1400 Independence Avenue, SW.  
Washington, D.C. 20250  
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- Transportation and roads (airport and roadway expansions, construction, operations and maintenance)
- Utilities
- Noise
- Air Quality
- Safety

USACE has contracted with Burns and McDonnell for the preparation of the EA, please contact Sara Kent, the Burns and McDonnell project manager, at (470) 508-9904 or at [sskent@burnsmcd.com](mailto:sskent@burnsmcd.com) if you need additional information.

We would appreciate your written response within thirty (30) days of your receipt of this request. Responses may be mailed to 4004 Summit Boulevard NE, Suite 1200, Atlanta, GA 30319 or emailed to [sskent@burnsmcd.com](mailto:sskent@burnsmcd.com).

Sincerely,

Nicholas Girken  
USDA, Project Manager

cc: Shauna Stotler/USACE

Appendix A: Project Maps

**From:** [Harris, Brandy M](#)  
**To:** [Harris, Brandy M](#)  
**Subject:** RE: USDA-ARS Laboratory Modernization Project, Davis Road, Tifton HP-210910-003 Response  
**Date:** Friday, January 7, 2022 8:26:04 AM

---

**From:** Santiago D. Martinez <[Santiago.Martinez@dca.ga.gov](mailto:Santiago.Martinez@dca.ga.gov)>  
**Sent:** Friday, October 22, 2021 2:15 PM  
**To:** Kent, Sara S <[sskent@burnsmcd.com](mailto:sskent@burnsmcd.com)>  
**Cc:** Girken, Nicholas - REE-ARS-CEC, Beltsville, MD <[nicholas.girken@usda.gov](mailto:nicholas.girken@usda.gov)>; Stotler, Shauna L CIV (USA) <[Shauna.Stotler@usace.army.mil](mailto:Shauna.Stotler@usace.army.mil)>; King, William R <[wrking@burnsmcd.com](mailto:wrking@burnsmcd.com)>; Henson, Kent <[khenson@burnsmcd.com](mailto:khenson@burnsmcd.com)>  
**Subject:** Re: USDA-ARS Laboratory Modernization Project, Davis Road, Tifton HP-210910-003 Response

Sara and others,

Good afternoon, thank you for getting this to me. Unfortunately, it appears there was a mistake on my end: instead of sending out our response letter, I accidentally sent out my review notes! The file names are very similar, so apparently, I got them mixed up - my apologies!

In any case, I have attached our response letter to this email. Fortunately, it looks like you were able to make pretty good sense of what I had sent and get us most of what we need to complete the review. I hate to ask given the circumstances, but if you could please gather the remaining items (see discussion below), it would be greatly appreciated.

For Item 1, this would just be an eligibility assessment of the lab campus as a whole, including which buildings are contributing or non-contributing. As I'm sure you noticed in my notes, information was a little hard to come by. It would seem that this campus likely has eligibility potential under Criterion A, and possibly C.

Item 2 appears to be covered in this email.

Item 3 is mostly covered, although a photo key would be very helpful. Additionally, even though no exterior alterations are proposed, it would be beneficial to have some exterior photos of the building, although these could be incorporated into Item 1.

Since the scope of work has changed to interior renovations of Building 1 only, it appears there will no longer be any ground disturbance, and thus, no potential to impact any archaeological resources. If you could just confirm that this understanding is correct, then Item 4 should be covered.

Again, my apologies for the mix up and for having to ask for the remaining items! Please let



me know if you have any questions for HPD and have a good weekend!

Best regards,

Santiago Martinez

Environmental Review Historian

Environmental Review & Preservation Planning

**Historic Preservation Division/Georgia DCA**

(404) 486-6425 | 60 Executive Park South, NE Atlanta, GA 30329

**Santiago D. Martinez**

Environmental Review Historian

Georgia Department of Community Affairs

Direct [4044866425](tel:4044866425)

[Santiago.Martinez@dca.ga.gov](mailto:Santiago.Martinez@dca.ga.gov)



---

**From:** Kent, Sara S <[sskent@burnsmcd.com](mailto:sskent@burnsmcd.com)>

**Sent:** Friday, October 22, 2021 12:48 PM

**To:** Santiago D. Martinez <[Santiago.Martinez@dca.ga.gov](mailto:Santiago.Martinez@dca.ga.gov)>

**Cc:** Girken, Nicholas - REE-ARS-CEC, Beltsville, MD <[Nicholas.Girken@usda.gov](mailto:Nicholas.Girken@usda.gov)>; Stotler, Shauna L CIV (USA) <[Shauna.Stotler@usace.army.mil](mailto:Shauna.Stotler@usace.army.mil)>; King, William R <[wrking@burnsmcd.com](mailto:wrking@burnsmcd.com)>; Henson, Kent <[khenson@burnsmcd.com](mailto:khenson@burnsmcd.com)>

**Subject:** RE: USDA-ARS Laboratory Modernization Project, Davis Road, Tifton HP-210910-003 Response

Hello Mr. Martinez,

I am following up to provide information on the USDA-ARS Laboratory Modernization Project, Davis Road, Tifton HP-210910-003 project. Due to funding and budget constraints, the USDA-ARS has narrowed the scope of work to include renovations to Building 1 as detailed below and attached. No additional renovations or demolitions are proposed for the Buildings noted in red as likely historic in the attached PDF response.

**Building 1**

- Constructed in 1962
- Renovated in 1978 to replace the boiler
- Renovated again in 1989, including new lights/ceiling, HVAC, and plumbing
- The proposed 2022 renovation will include replacing the ceiling tiles, installing new lights, and replacing the HVAC system and duct work. The ceiling and lights will be similar in appearance to the existing. Additionally, 4 non-load bearing walls will be demolished. No exterior changes are proposed.

Interior photos of Building 1, including the existing ceiling tiles, lighting, and the 4 walls proposed for demolition are attached for your review.

- The proposed new lighting information is also attached
- Lastly, I've attached a floorplan showing the location of the 4 walls proposed for demolition (highlighted in yellow)

Please let us know if you have any additional questions or need any additional information about the project. We appreciate your response. Thanks!

**Sara Kent \ Burns & McDonnell**

Project Manager, Environmental Services

o 470-508-9904 \ M 770-363-1453

[sskent@burnsmcd.com](mailto:sskent@burnsmcd.com) \ [burnsmcd.com](http://burnsmcd.com)

4004 Summit Boulevard \ Suite 1200 \ Atlanta, GA 30319

**\*\*\*Please note my new office address**

---

**From:** ER <[er@dca.ga.gov](mailto:er@dca.ga.gov)>

**Sent:** Wednesday, October 6, 2021 12:05 PM

**To:** [nicholas.girken@usda.gov](mailto:nicholas.girken@usda.gov)

**Cc:** Kent, Sara S <[sskent@burnsmcd.com](mailto:sskent@burnsmcd.com)>

**Subject:** USDA-ARS Laboratory Modernization Project, Davis Road, Tifton HP-210910-003 Response

From: Historic Preservation Division

Attached is our letter on the subject undertaking (in Adobe Acrobat PDF format)

**Do not respond to this e-mail.**

If you have any questions concerning our letter, please contact:

Santi Martinez at [santiago.martinez@dca.ga.gov](mailto:santiago.martinez@dca.ga.gov).

A free copy of Adobe Acrobat Reader can be downloaded from: [www.adobe.com](http://www.adobe.com)



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**ER**

**Georgia Department of Community Affairs**

[er@dca.ga.gov](mailto:er@dca.ga.gov)

October 6, 2021

Nicholas Girken  
Project Manager  
U.S. Department of Agriculture – Office of the Administrator  
Jamie L. Whitten Federal Building, Room 302-A  
1400 Independence Avenue SW  
Washington, D.C. 20250

**RE: USDA-ARS Laboratory Modernization Project, Davis Road, Tifton  
Tift County, Georgia  
HP-210910-003**

Dear Mr. Girken:

The Historic Preservation Division (HPD) has received initial information concerning the above referenced project requesting comments pursuant to the National Environmental Policy Act of 1969 (NEPA). Our comments are offered to assist the U.S. Department of Agriculture (USDA), Agriculture Research Service (ARS) in complying with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA).

Thank you for notifying us of this federal undertaking. We look forward to receiving Section 106 compliance documentation, as appropriate. Section 106 documentation should include:

1. An eligibility assessment of the USDA-ARS Tifton Laboratory Campus, including discussion of its relationship and possible integration into the previously determined National Register of Historic Places (NRHP)-eligible University of Georgia Tifton campus.
2. Project plans that include elevation drawings, site and landscape plans, and a description of proposed exterior materials for the new construction. Project plans that include detailed descriptions of proposed work, existing and proposed floorplans (if applicable), and description of proposed interior and exterior materials as applicable, for the rehabilitation portions of the project.
3. Current photographs, keyed to a map, of the existing buildings within the USDA-ARS Tifton Laboratory Campus, particularly those subject to project activities. For the remodeling activities, please include interior photographs, keyed to a floorplan, of areas where work will be occurring.
4. Potential for archaeological impacts, including previous surveys/results, potential for buried cultural resources in the project area, and proposed ground disturbance information.

If the federal agency intends to utilize NEPA to comply with Section 106, in lieu of the procedures set forth in 36 CFR Part 800, the USDA-ARS should notify HPD and the Advisory Council on Historic Preservation of its intent.

Please refer to project number **HP-210910-003** in future correspondence regarding this project. If we may be of further assistance, please contact Santiago Martinez, Environmental Review Historian, at (404) 486-6425 or [Santiago.Martinez@dca.ga.gov](mailto:Santiago.Martinez@dca.ga.gov).

Sincerely,



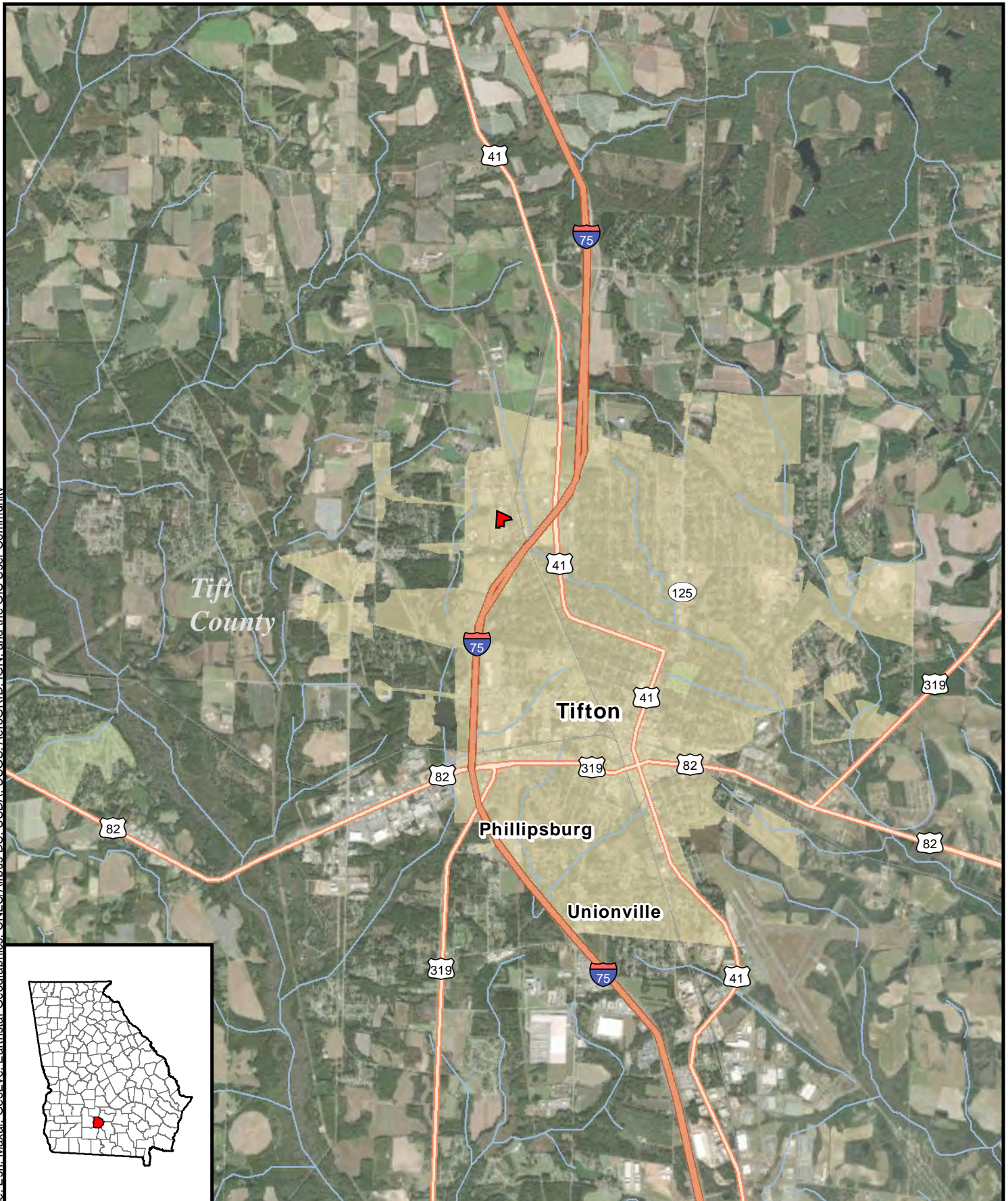
Jennifer Dixon, MHP, LEED Green Associate  
Program Manager  
Environmental Review & Preservation Planning

JAD/sdm  
cc: Sara Kent, Burns & McDonnell



## **APPENDIX B -PROJECT MAPS**





Project Boundary



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Figure B-1  
Project Location  
USDA-ARS  
Laboratory Modernization  
Tift County, Georgia



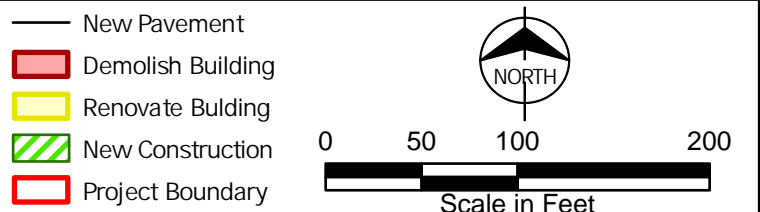
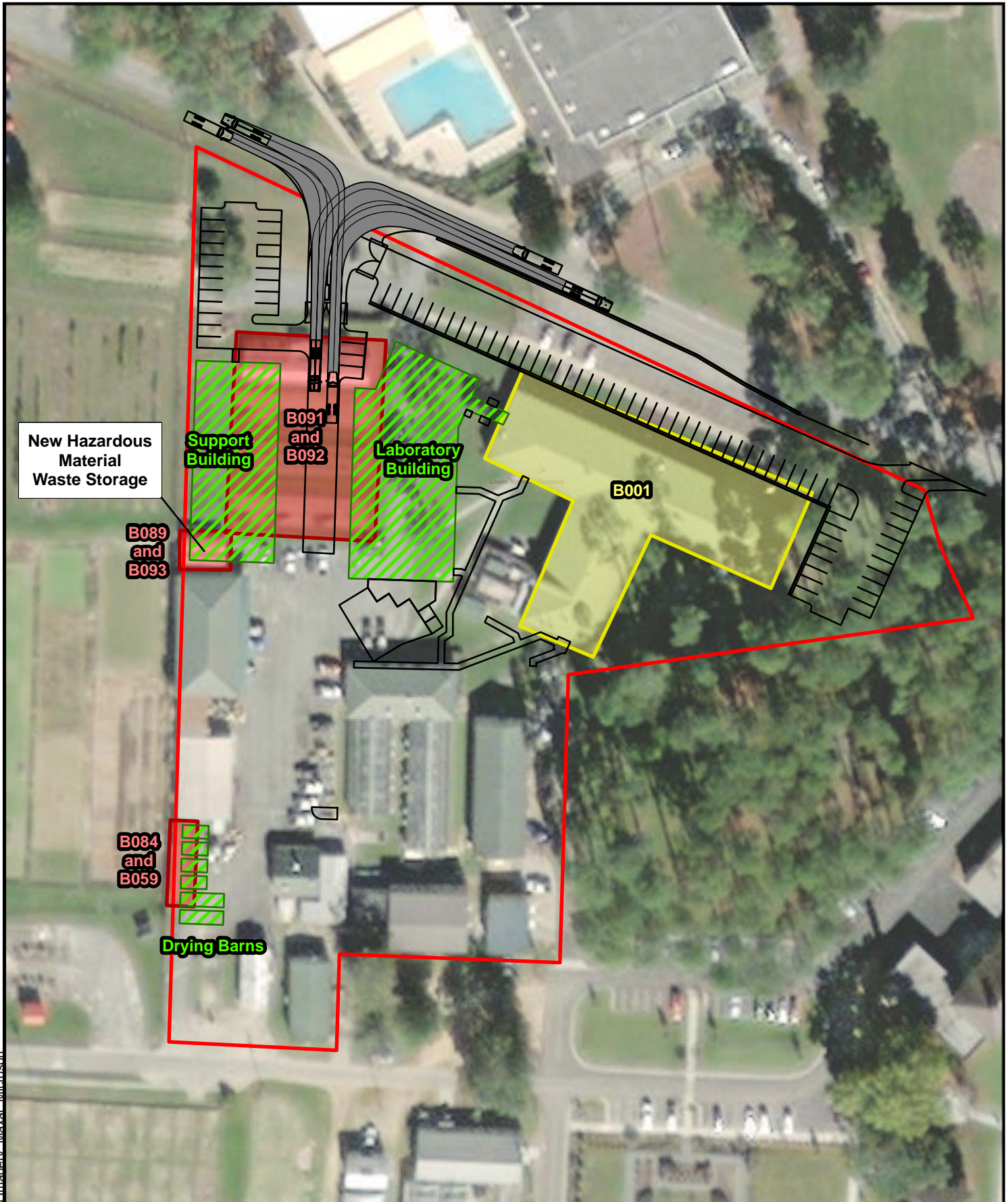
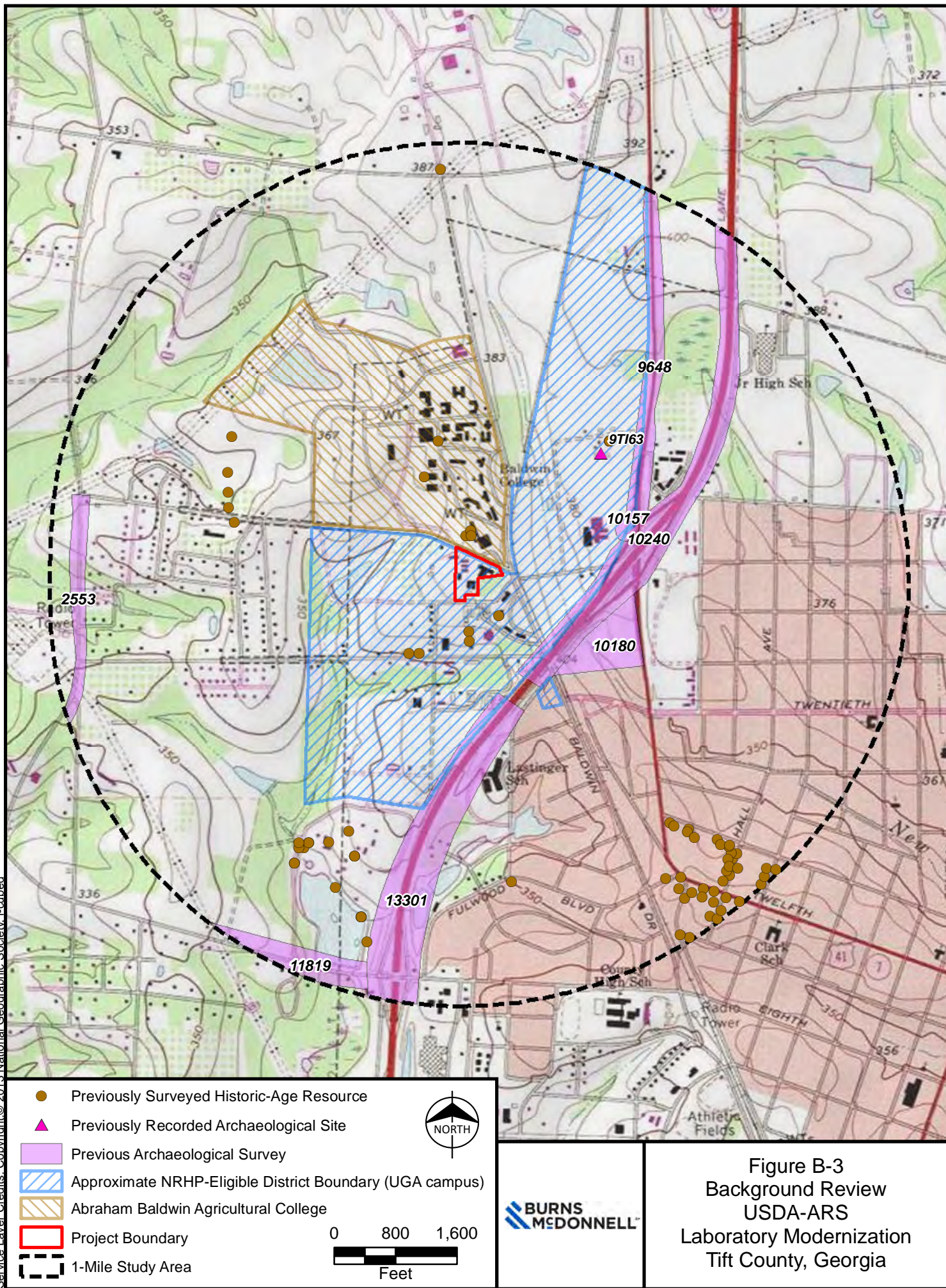


Figure B-2  
Proposed Undertaking  
USDA-ARS  
Laboratory Modernization  
Tift County, Georgia



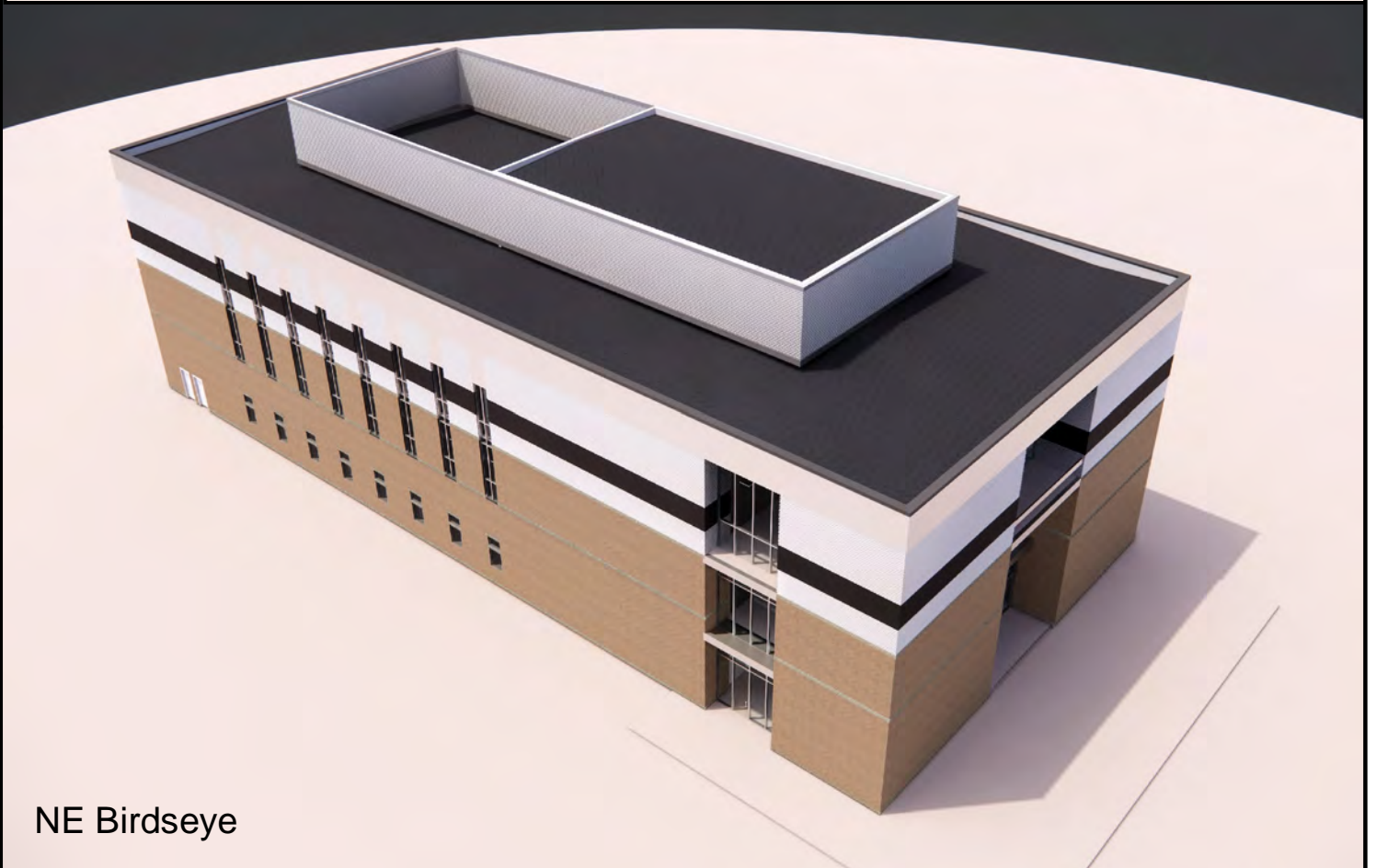




NW Approach



NE Birdseye



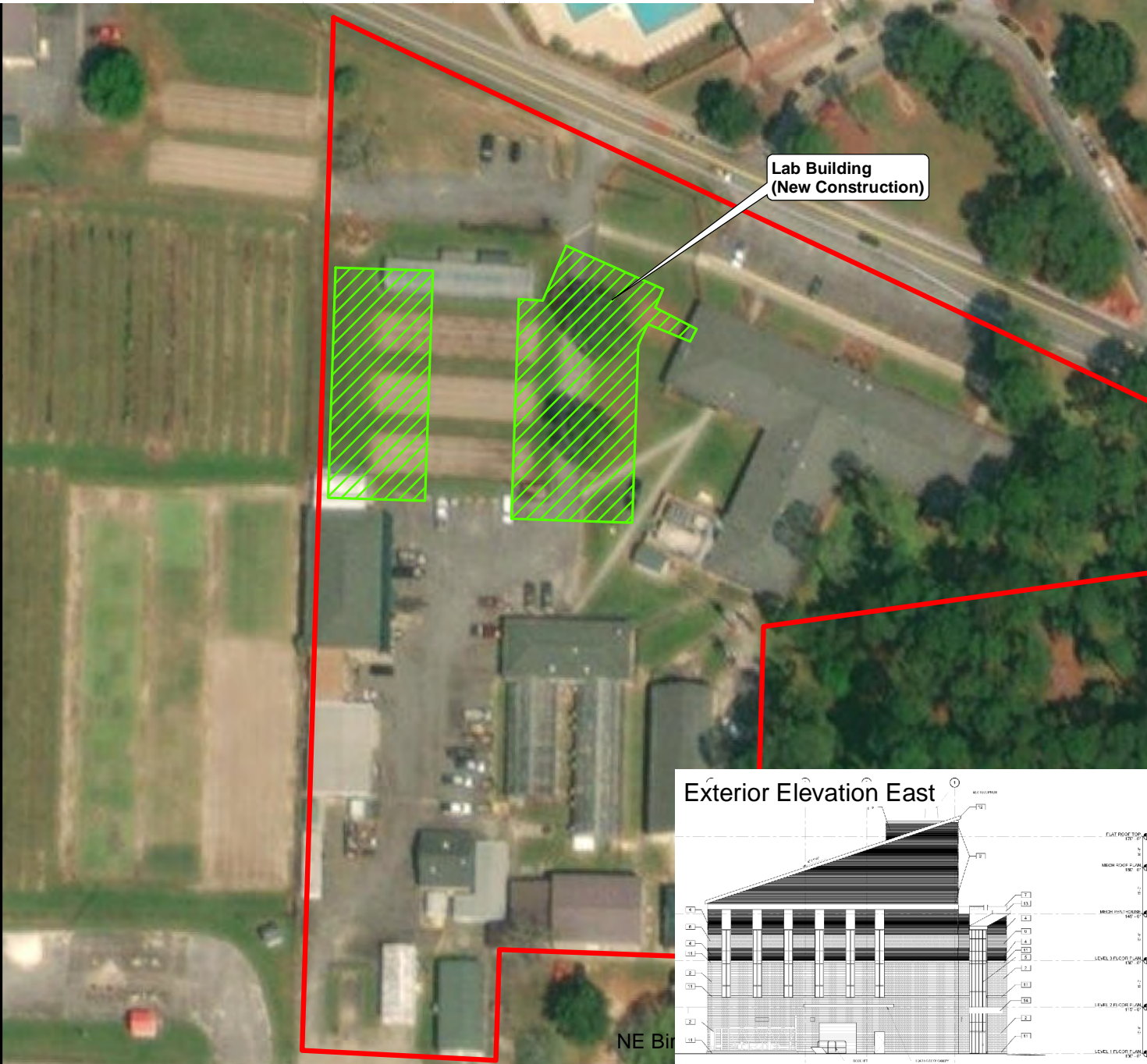
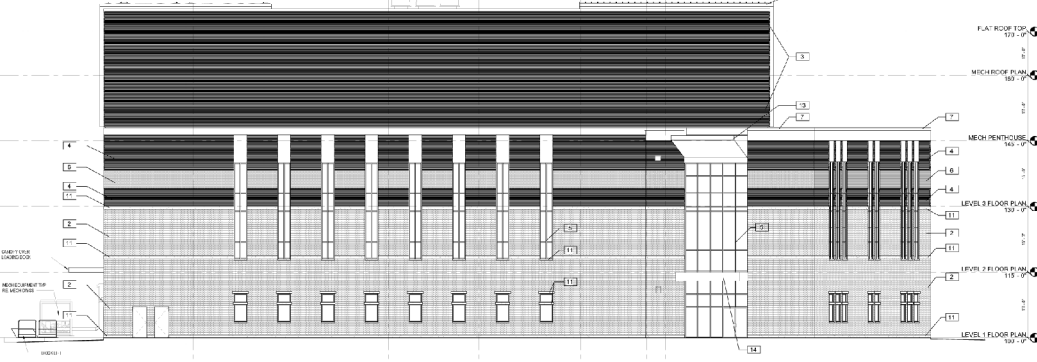
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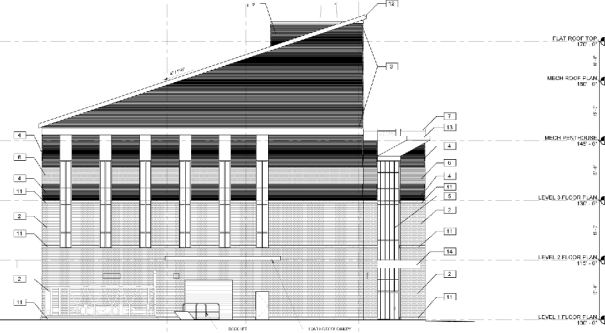
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Lab Building Renderings  
USDA-ARS  
Laboratory Modernization  
Tift County, Georgia





## Exterior Elevation North



## Exterior Elevation East



-  New Construction
-  Project Boundary

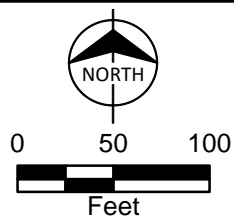
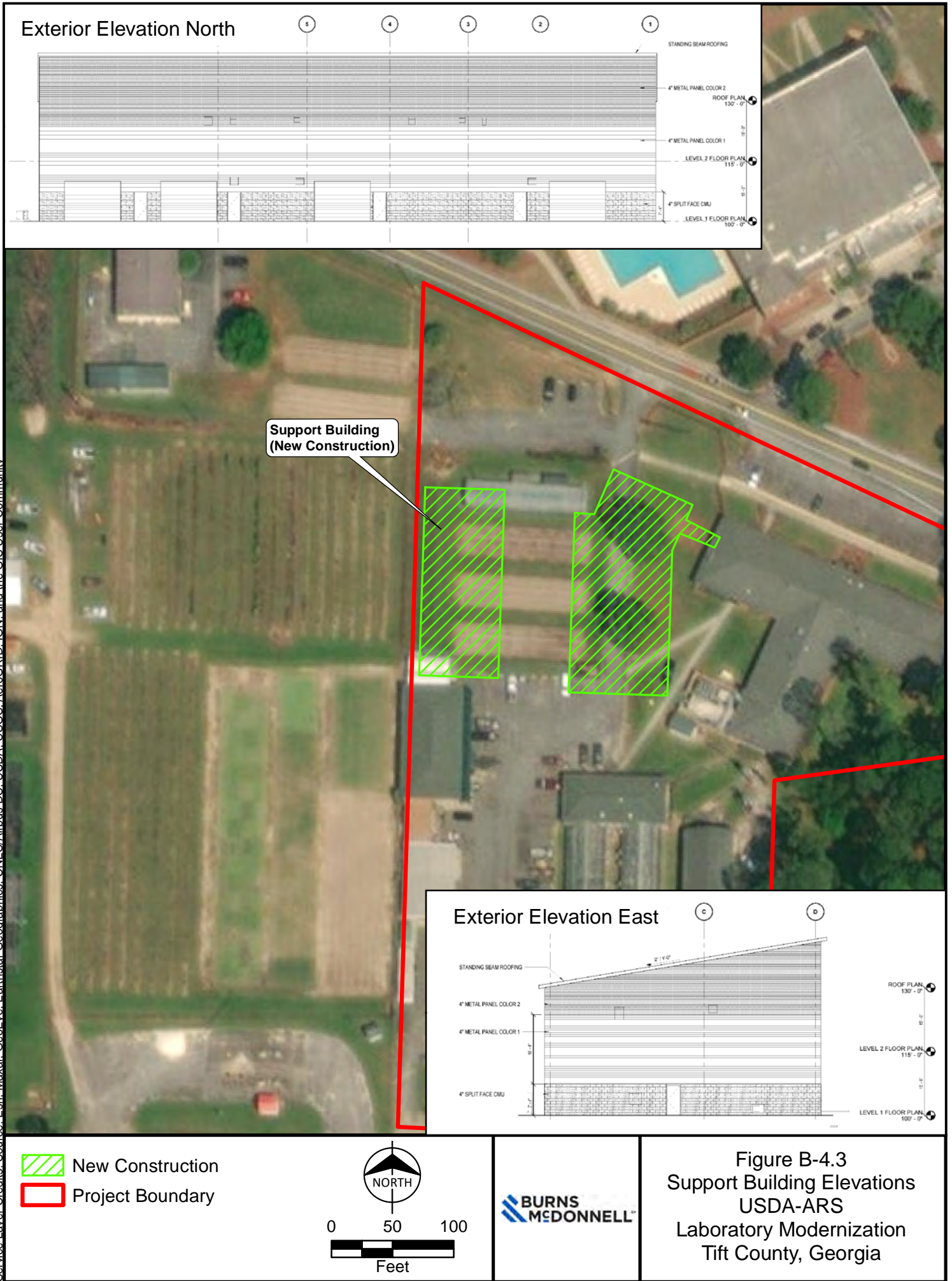


Figure B-4.2  
 Lab Building Elevations  
 USDA-ARS  
 Laboratory Modernization  
 Tift County, Georgia



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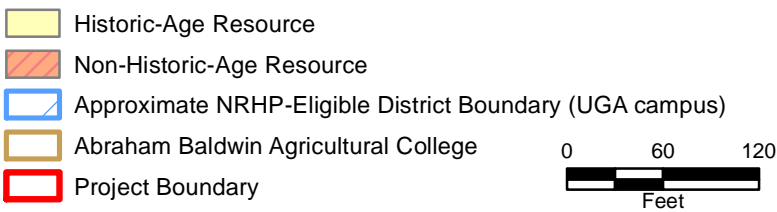
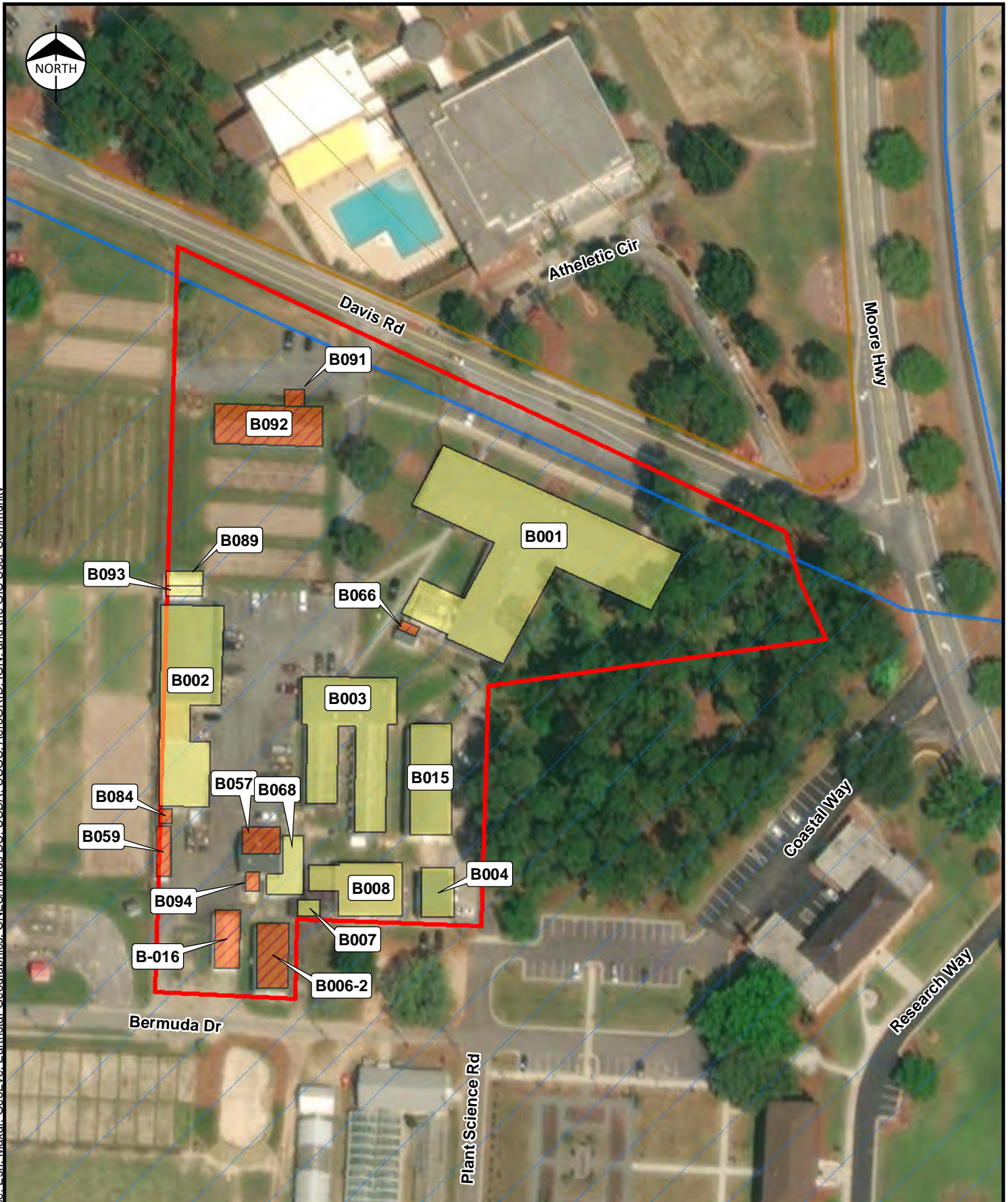
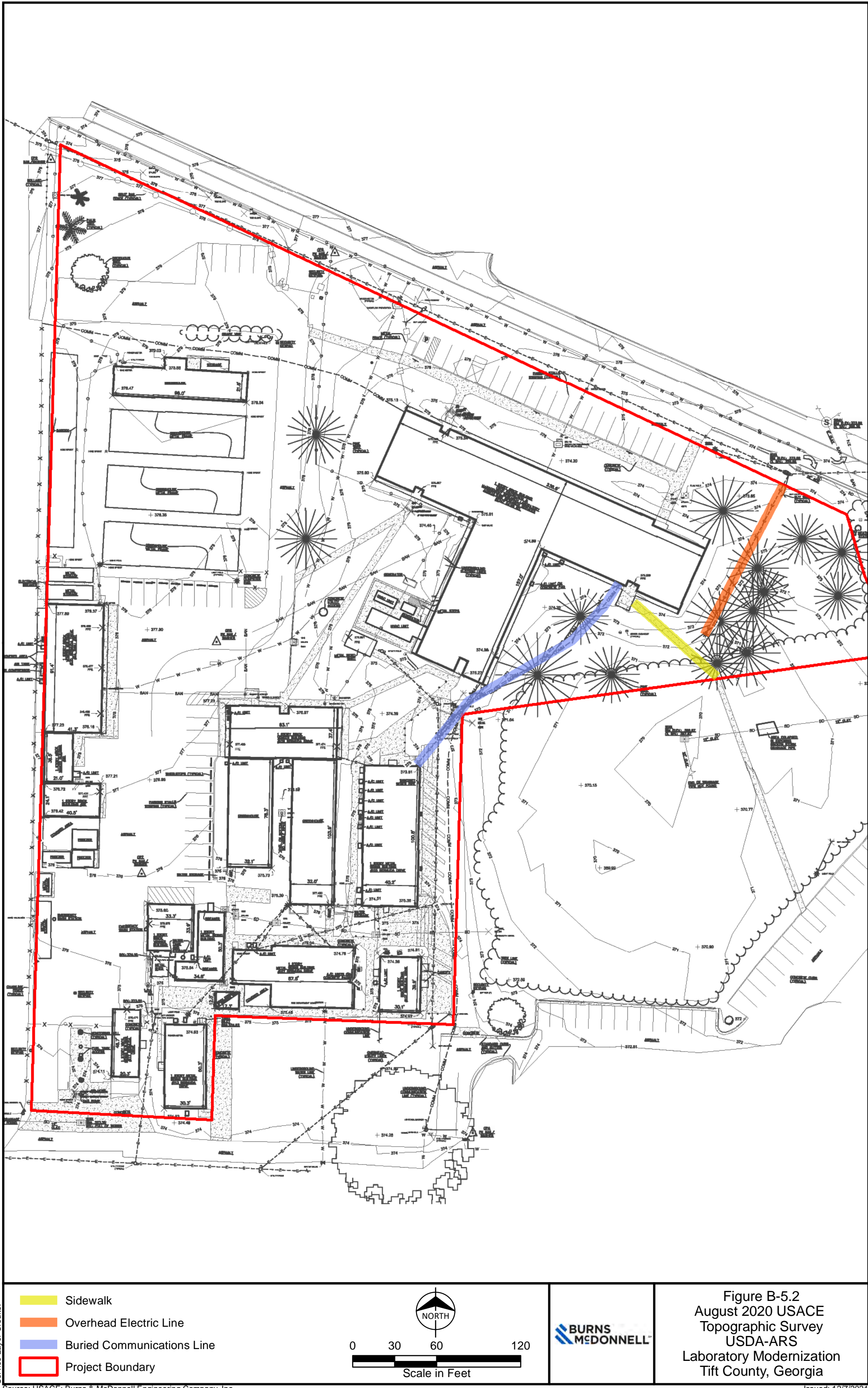


Figure B-5.1  
Resource Location Map  
USDA-ARS  
Laboratory Modernization  
Tift County, Georgia



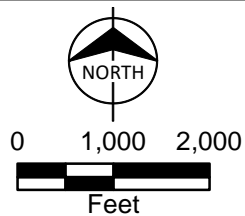
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 Project Boundary



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MCDONNELL

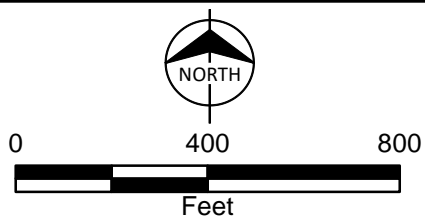
Figure B-6  
1910 USDA Soil Survey  
USDA-ARS  
Laboratory Modernization  
Tift County, Georgia



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 Project Boundary

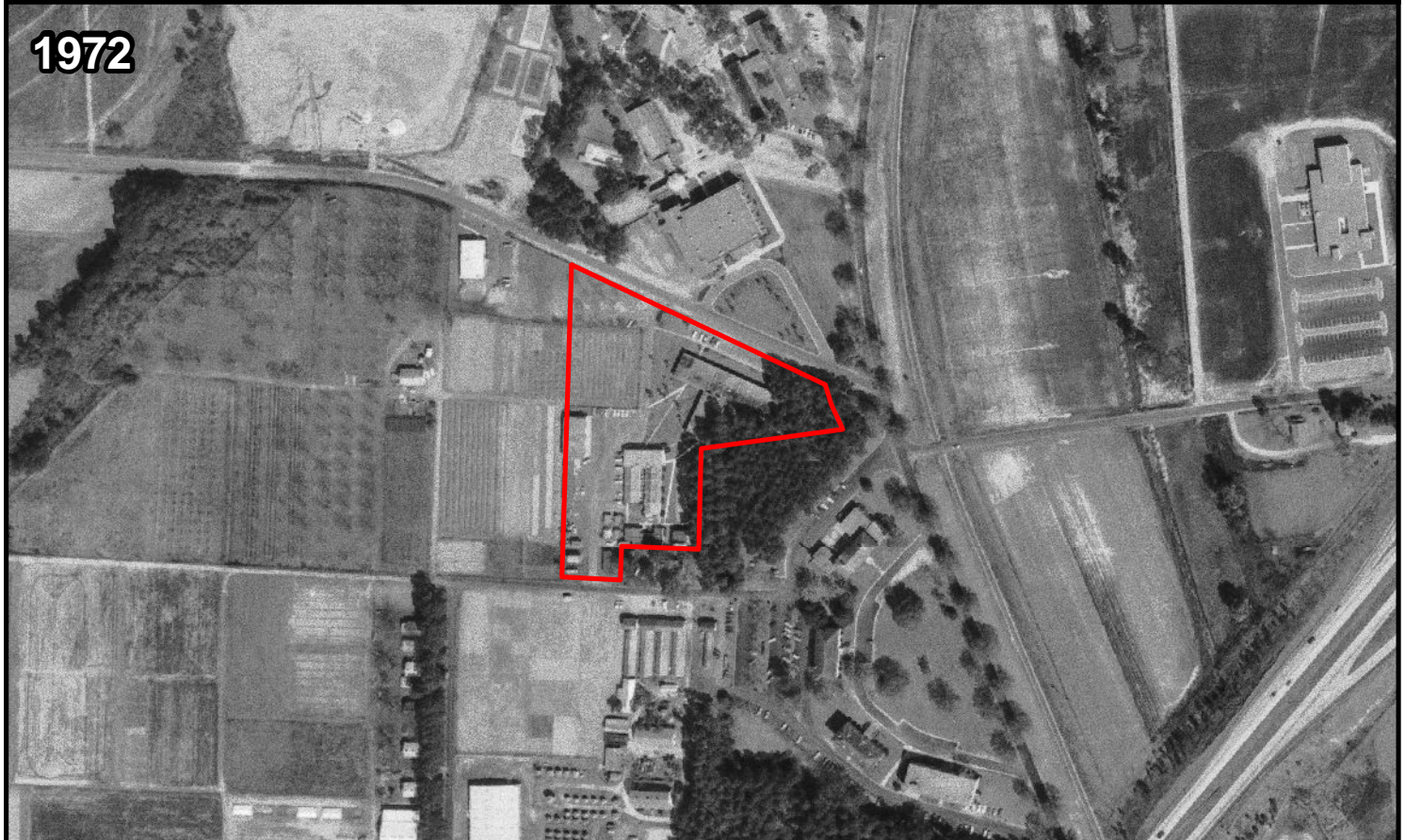


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Figure B-7.1  
Historic 1937 & 1948 Aerials  
USDA-ARS  
Laboratory Modernization  
Tift County, Georgia



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Project Boundary



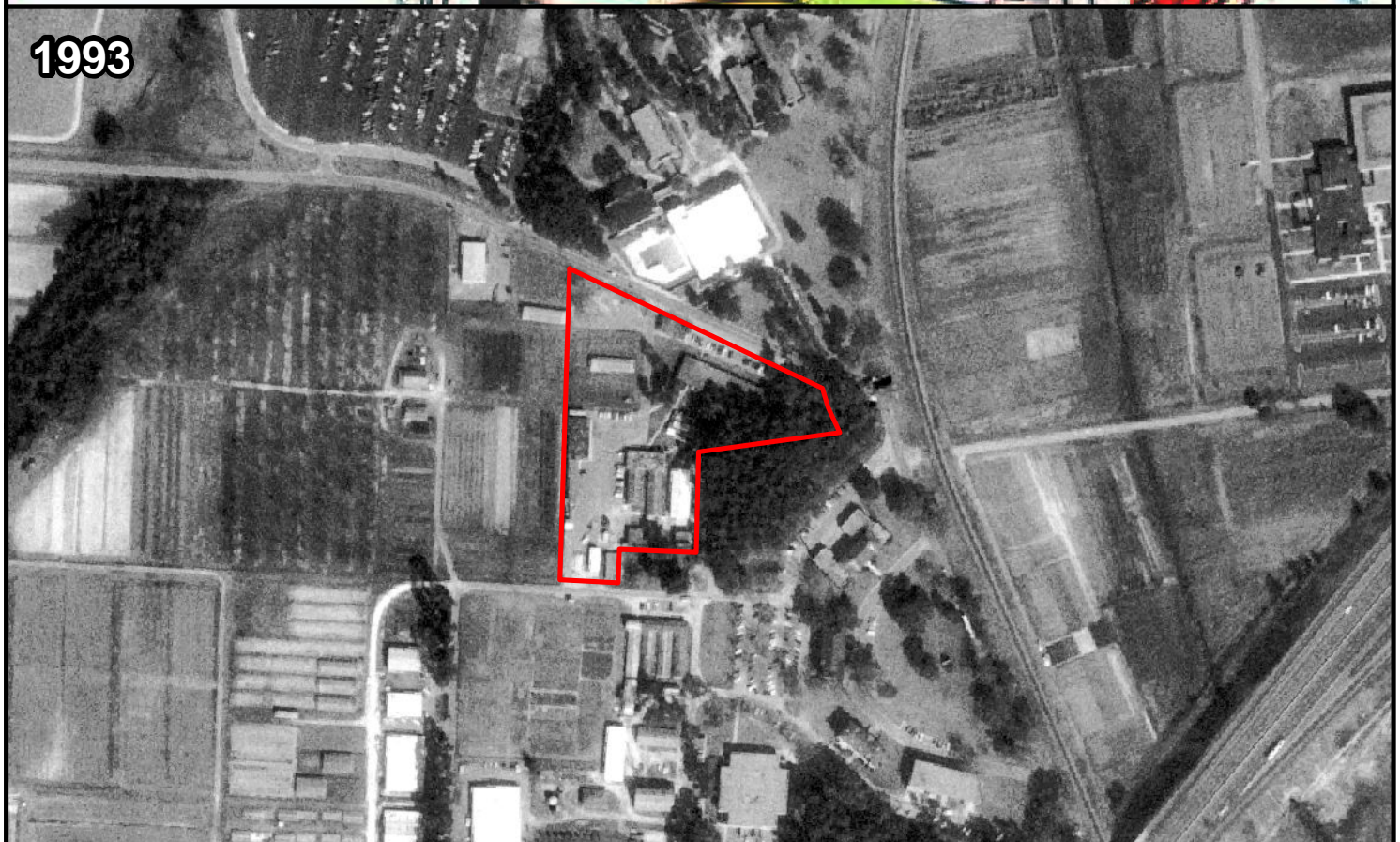
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Figure B-7.2  
Historic 1962 & 1972 Aerials  
USDA-ARS  
Laboratory Modernization  
Tift County, Georgia



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Service Layer Credits



Project Boundary



0 200 400



Base Map: USGS 1:24k "Tifton West"  
Quadrangle, 1973.

BURNS  
MCDONNELL

Figure B-7.3  
Historic 1973 Topo & 1993 Aerials  
USDA-ARS  
Laboratory Modernization  
Tift County, Georgia

**ATTACHMENT C -PHOTOGRAPHS**





Photograph C-1: Overview of B001, primary façade, camera facing southwest.



Photograph C-2: Overview of B001, lateral and rear elevations, camera facing northeast.





Photograph C-3: Detail view of B001, camera facing south.



Photograph C-4: View of main entrance, B001, camera facing southeast.





Photograph C-5: Overview of B001, camera facing southwest.



Photograph C-6: View of B001, camera facing southeast.





Photograph C-7: View of rear entrance, B001, camera facing north.



Photograph C-8: View of 1982 HVAC equipment associated with B001, camera facing east.





Photograph C-9: Overview of B002, camera facing northwest.



Photograph C-10: View of B002, camera facing southwest.





Photograph C-11: View of original portion of B002, camera facing northwest.



Photograph C-12: View of hyphen connecting B002 to non-historic-age addition, camera facing west.



Photograph C-13: View of non-historic-age addition associated with B002, camera facing west.



Photograph C-14: View of non-historic-age addition associated with B002, camera facing northwest.





Photograph C-15: View of B003 headhouse, camera facing south.



Photograph C-16: View of B003 greenhouse, camera facing northwest.



Photograph C-17: View of B003 greenhouses, camera facing northeast.



Photograph C-18: View of B004, camera facing southwest.





Photograph C-19: View of B008, camera facing east.



Photograph C-20: View of B008, camera facing south.





Photograph C-21: View of B008 (right), camera facing east.



Photograph C-22: View of B013, camera facing south.





Photograph C-23: View of B013 (center), camera facing southeast.



Photograph C-24: View of B013, camera facing east.





Photograph C-25: View of B015, camera facing northwest.



Photograph C-26: View of B015, camera facing south.



Photograph C-27: View of B016, camera facing southeast.



Photograph C-28: View of B059, camera facing north.





Photograph C-29: View of B059, camera facing northwest.



Photograph C-30: View of B066, camera facing east.





Photograph C-31: View of B066, camera facing west.



Photograph C-32: View of B066, camera facing northeast.





Photograph C-33: View of B068, camera facing southwest.



Photograph C-34: View towards B084, camera facing northwest.



Photograph C-35: View of B084, camera facing west.



Photograph C-36: View of B084, camera facing west-northwest.





Photograph C-37: View of B089, camera facing south.



Photograph C-38: View of B091 (non-historic-age; left) and B092 (hoop house), camera facing southeast.





Photograph C-39: View of hoop house remnants (left) and B092 (right), camera facing southwest.



Photograph C-40: View of B092, camera facing east.





Photograph C-41: View of B093 (left) and B089 (right), camera facing west.



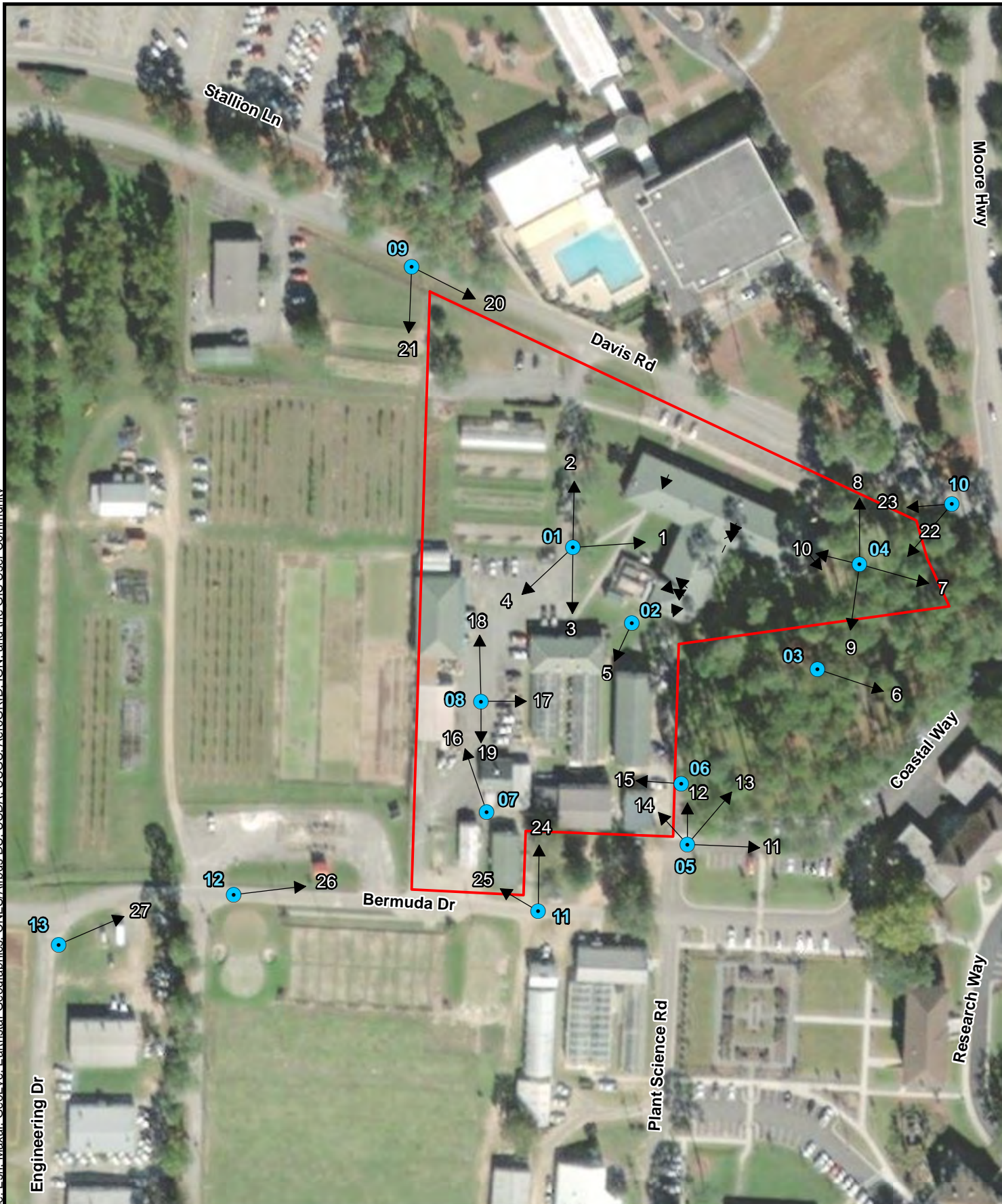
Photograph C-42: View of B057 (left, non-historic-age) and B094 (right), camera facing west.



Photograph C-43: View of B094, camera facing west.



**ATTACHMENT D - CONTEXT PHOTOGRAPHS**



- Photo Point
- ➔ Photo Direction
- Project Boundary

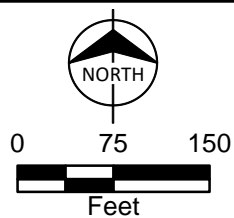


Figure D-1  
 Contextual Photographs  
 USDA ARS Laboratory Tifton  
 USACE  
 Tift County, Georgia





Photograph D-1: Photo Point 01, setting overview showing B001 from main entry drive, camera facing east.



Photograph D-2: Photo Point 01, view of towards Davis Road from main entry drive, camera facing north.





Photograph D-3: Photo Point 01, toward B003 from main entry drive, camera facing south.



Photograph D-4: Photo Point 01, view towards B002 from main entry drive, camera facing southwest.





Photograph D-5: Photo Point 02, view towards B003 from rear of B001, camera facing southwest.



Photograph D-6: Photo Point 03, view towards Moore Highway, camera facing east.





Photograph D-7: Photo Point 04, view towards Moore Highway, camera facing east.



Photograph D-8: Photo Point 04, view towards Davis Road, camera facing north.





Photograph D-9: Photo Point 04, camera facing south.



Photograph D-10: Photo Point 04, view towards B001, camera facing north.





Photograph D-11: Photo Point 05, setting view towards Costal Way, camera facing east.



Photograph D-12: Photo Point 05, view towards B015 and B001, camera facing north.





Photograph D-13: Photo Point 05, view towards B001, camera facing northeast.



Photograph D-14: Photo Point 05, view towards B015 and B004, camera facing northwest.





Photograph D-15: Photo Point 06, view towards B057, camera facing west.



Photograph D-16: Photo Point 07, view towards B002, camera facing northwest.





Photograph D-17: Photo Point 08, view towards B003, camera facing east.



Photograph D-18: Photo Point 08, view of towards Resources B002 and B092, camera facing north.





Photograph D-19: Photo Point 08, view towards B057, camera facing south.



Photograph D-20: Photo Point 09, overview of Project from Davis Road, camera facing east.





Photograph D-21: Photo Point 09, overview of campus from Davis Road, camera facing south.



Photograph D-22: Photo Point 10, view of proposed parking area from Davis Road, camera facing south.





Photograph D-23: Photo Point 10, view from Davis Road towards B001, camera facing southwest.



Photograph D-24: Photo Point 11, from Bermuda Drive towards B007, camera facing north.





Photograph D-25: Photo Point 11, view from Bermuda Drive towards B006, camera facing northwest.



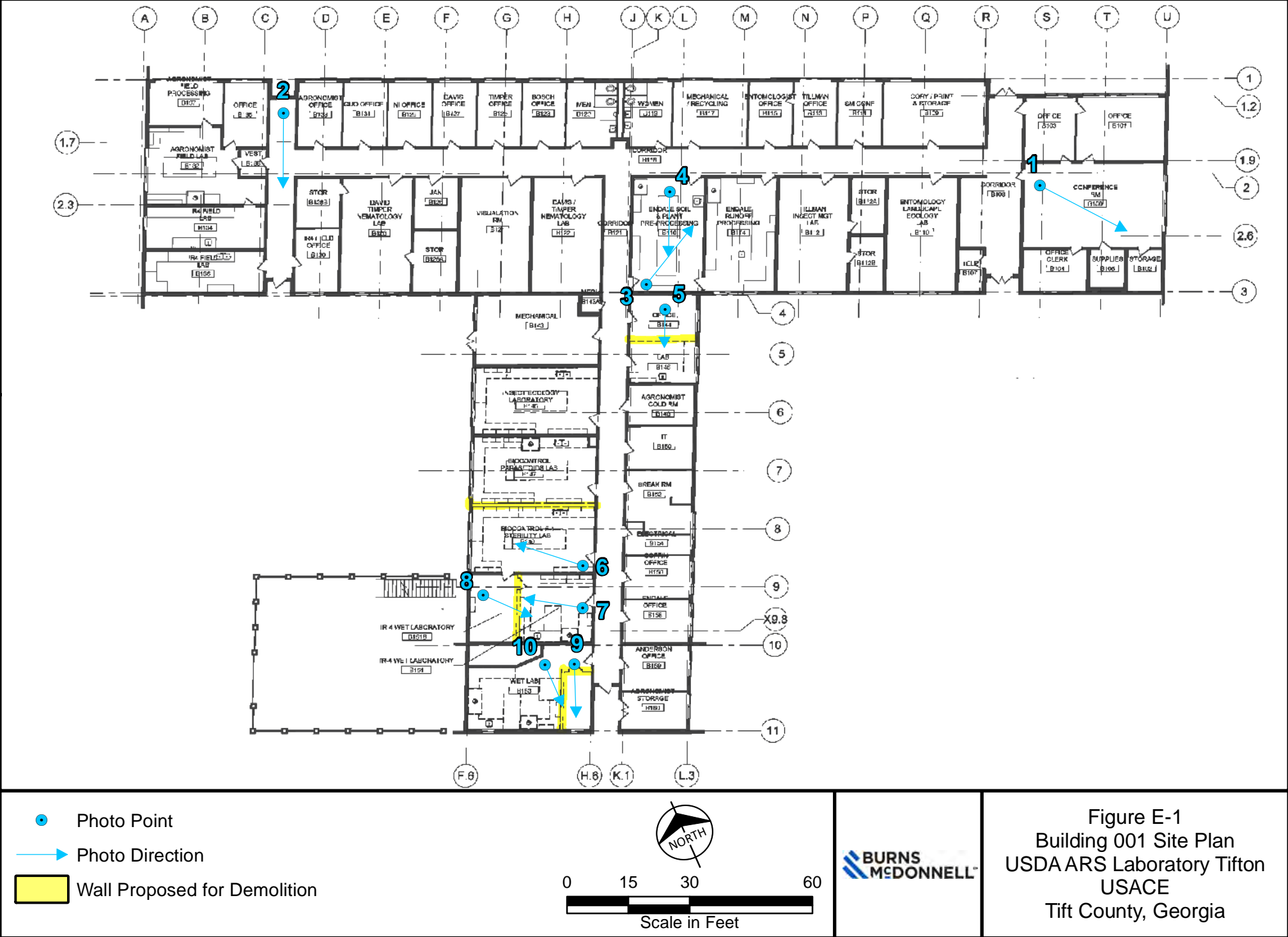
Photograph D-26: Photo Point 12, view from Bermuda Drive towards campus, camera facing east.

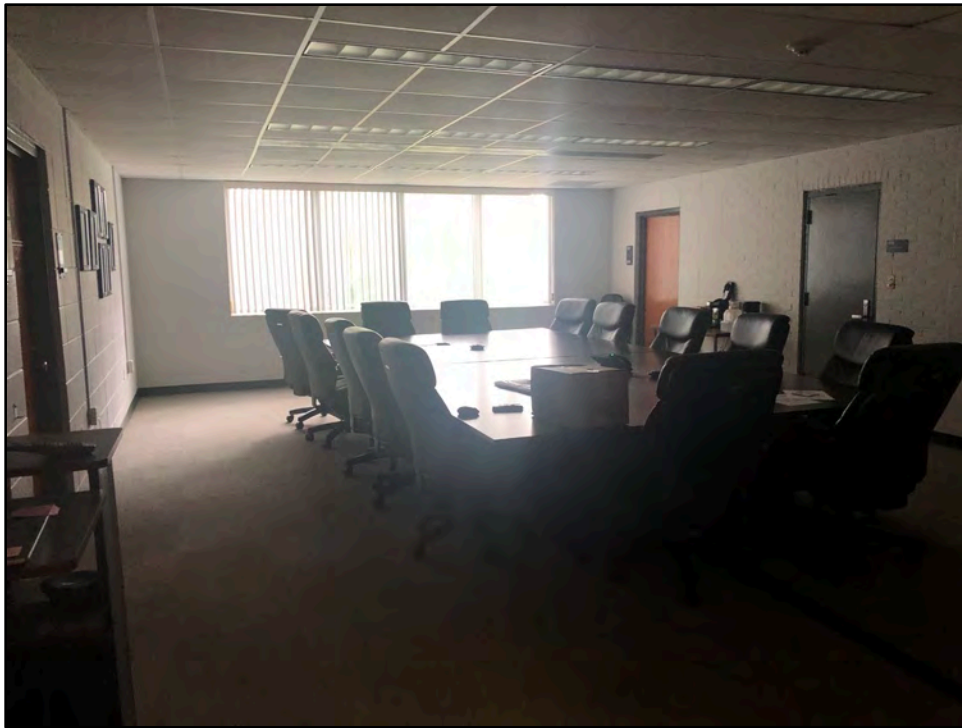


Photograph D-27: Photo Point 13, view from Bermuda Drive towards campus, camera facing east.



**ATTACHMENT E - BUILDING 001 ADDITIONAL DOCUMENTATION**





Photograph E-1: Interior view of B100 (Conference Room) showing light fixtures and ceiling tiles proposed for replacement, camera facing east.



Photograph E-2: Interior view of B001 near VEST B138 showing light fixtures and ceiling tiles proposed for replacement, camera facing south.



Photograph E-3: Interior view of B116 (Endale Soil & Plant Pre-Processing) showing light fixtures and ceiling tiles proposed for replacement, camera facing northeast.



Photograph E-4: Interior view of B116 (Endale Soil & Plant Pre-Processing) showing light fixtures and ceiling tiles proposed for replacement, camera facing south.





Photograph E-5: Interior view of B144 (Office) in B001 showing wall to be demolished between office space and laboratory, camera facing south.



Photograph E-6: Interior view of B149 (Sterility Laboratory) in B001 showing wall to be demolished to facilitate expansion of the laboratory space, camera facing northwest.

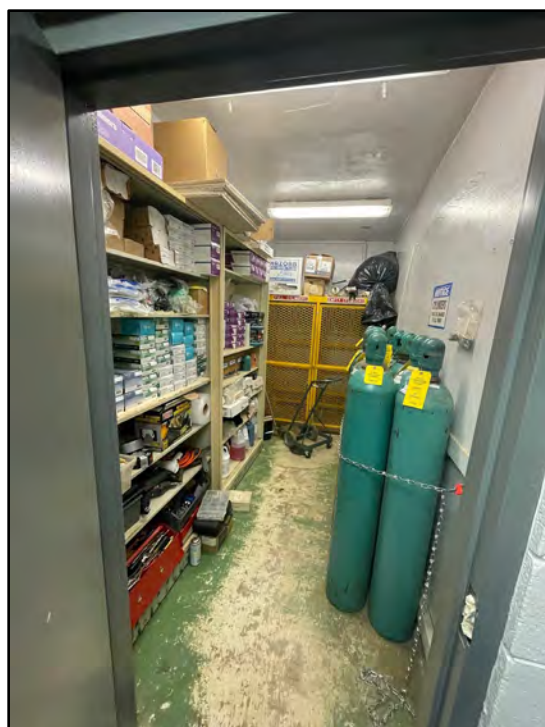


Photograph E-7: Interior view of B151 (Wet Laboratory) in B001 showing wall proposed for demolition to increase size of laboratory space, camera facing northwest.

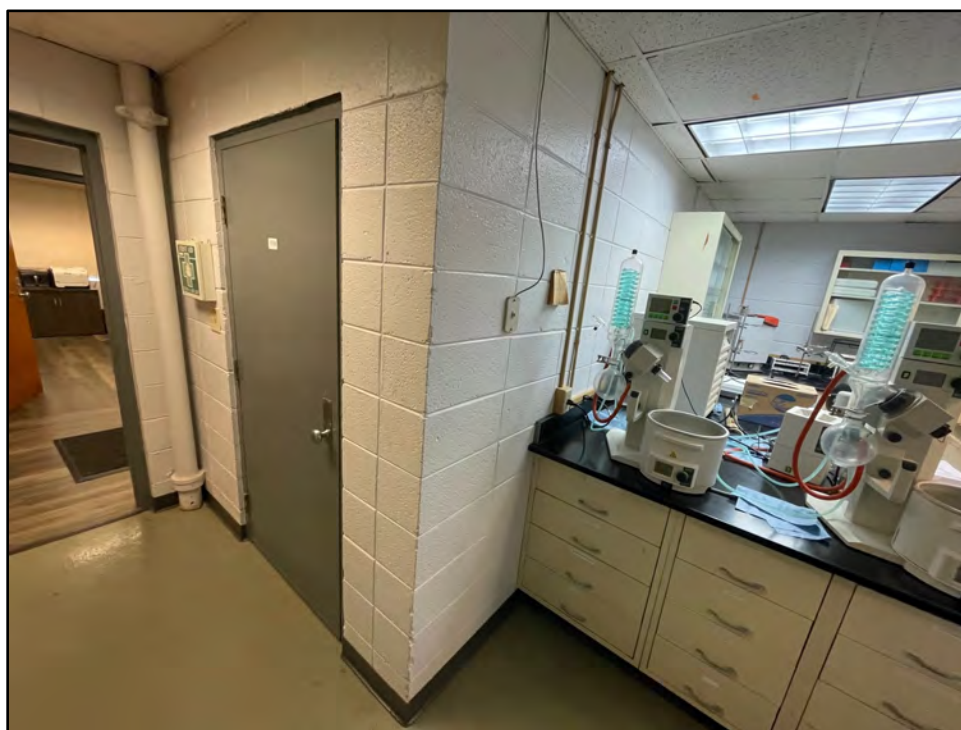


Photograph E-8: Interior view of B151B (Wet Laboratory) in B001, camera facing east.





Photograph E-9: Interior view of B153 (Wet Laboratory) in B001; proposing to demolish walls to incorporate closet into larger laboratory space, camera facing south.



Photograph E-10: Interior view of B153 (Wet Laboratory) in B001 showing proposed expansion area, camera facing southeast.

February 14, 2022

Brandy Harris  
Senior Cultural Resources Specialist  
Burns & McDonnell  
8911 Capitol of Texas Highway, Building 3, Suite 3100  
Austin, Texas 78759

**RE: USDA-ARS Laboratory Modernization Project, Davis Road, Tifton  
Tift County, Georgia  
HP-210910-003**

Dear Ms. Harris:

The Historic Preservation Division (HPD) has received the information submitted concerning the above referenced project. Our comments are offered to assist the U.S. Department of Agriculture (USDA), Agricultural Research Service (ARS) in complying with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA).

The subject project consists of modernization activities at the USDA-ARS Tifton Campus along Davis Road in Tifton, including replacing ceiling tiles, lighting, and HVAC units and demolishing four interior walls in the circa 1962 building B001, demolishing the circa 1990s B091 and B092 structures as well as the circa mid to late-1970s B089 and B093 and circa 1980s B084 structures, realigning the north-south drive through the campus, constructing a three-story laboratory building with a connector to building B001 and a separate two-story support building along with associated parking areas, and relocating the circa 1980s B059 structure. Based on the information provided, HPD concurs that the USDA-ARS Tifton Campus is eligible for listing in the National Register of Historic Places (NRHP). Therefore, it is HPD's opinion that the project, as currently proposed, constitutes an **adverse effect** to historic properties that are eligible for or listed in the NRHP, as defined in 36 CFR Part 800.5(a)(2). The scale and massing of the new construction, the alteration of exterior circulation spaces, including both automobile and pedestrian, away from the historic buildings and established hierarchy of spaces, and the alteration of the historic buildings' relationship to the setting and landscape is not consistent with the Secretary of the Interior's *Standards for the Treatment of Historic Properties*. If the scope of work (SOW) for this project changes so that it conforms to the Secretary's *Standards*, prior to drafting a Memorandum of Agreement (MOA), please forward the updated SOW to HPD for review and comment, once available.

HPD would like to note that this determination of an adverse effect is not the end of the Section 106 consultation process. When an adverse effect to a historic property is found, the federal agency must notify the Advisory Council on Historic Preservation (ACHP) of the determination and draft a MOA to resolve the adverse effect. If the federal agency delegates ACHP notification responsibility to the applicant, the applicant should utilize the ACHP's e-notification system available here: <https://www.achp.gov/e106-email-form>. If the federal agency delegates the drafting of a MOA to the applicant, the applicant should visit the ACHP's *Guidance on Agreement Documents* webpage, found here: <https://www.achp.gov/initiatives/guidance-agreement-documents> and utilize the MOA template found therein.



Please include all avoidance and minimization measures, along with mitigation proposed to resolve the adverse effect, as stipulations in the draft MOA. HPD will review the draft MOA and should be provided the opportunity to review any associated deliverables stipulated therein, within 30 days of receipt. Absent federal agency involvement, HPD is available to provide technical assistance in resolving adverse effects.

We look forward to working with you as this project progresses and to receiving either a revised SOW that is consistent with the Secretary's *Standards* or a draft MOA. Please refer to project number **HP-210910-003** in any future correspondence regarding this project. If we may be of further assistance, please contact Aspen Kemmerlin, Compliance Archaeologist, at (404) 486-6396 or [Aspen.Kemmerlin@dca.ga.gov](mailto:Aspen.Kemmerlin@dca.ga.gov) or Santiago Martinez, Environmental Review Historian, at (404) 486-6425 or [Santiago.Martinez@dca.ga.gov](mailto:Santiago.Martinez@dca.ga.gov).

V/r,

A handwritten signature in blue ink, appearing to read "Dave Crass", written over a horizontal line.

Dr. David Crass  
Division Director  
Deputy State Historic Preservation Officer

DCC/sdm

cc: Michael Jacobs, Southern Georgia Regional Commission  
Nicholas Girken, USDA-ARS



## CONSULTING PARTIES LETTER OF INVITATION

March 29, 2022

Scott Messer, Director of Historic Preservation  
University of Georgia, Office of University Architects  
210 River Road  
Athens, GA 30602

**Re: United States Department of Agriculture-Agricultural Research Service (USDA-ARS)  
Laboratory Modernization Project (HP-210910-003), Davis Road, Tifton, Tift County,  
Georgia**

Dear Mr. Messer:

The United States Department of Agriculture's Agricultural Research Service (USDA-ARS) is proposing a consolidation and modernization project (Project) at their research facility in Tifton, Georgia (Attachment 1: Figure 1). The proposed federal undertaking requires compliance with Section 106 of the National Historic Preservation Act (NHPA). The 5.25-acre USDA-ARS Tifton Campus supports the Southeast Watershed Research Unit (SEWRU) and the Crop Genetics and Breeding Research Unit (CGBRU) research facilities. SEWRU's water resources research includes systems research on the feedbacks between agricultural practices, environmental conditions, pest management, and the role water plays in linking these components of agricultural systems. CGBRU conducts research to improve breeding methods and plant genetics for improved crop yields, enhanced environmental quality, and pest management strategies. Research is conducted on warm season grasses (forage and turf), corn, peanuts, and sorghum. The USDA-ARS Tifton Administrative Officer and staff serve both the SEWRU and CGBRU, as well as the National Peanut Research Laboratory in Dawson, Georgia.

The CGBRU and administrative staff occupy administrative and laboratory buildings on the USDA-ARS Tifton Campus and on the adjacent University of Georgia (UGA) campus. The USDA-ARS lease with University of Georgia (UGA) for these buildings expires in 2023. The proposed Project would provide more laboratory and administrative space on the USDA-ARS Tifton Campus and would reduce the amount of leased space from UGA. The proposed Project would include demolishing outdated structures, constructing new buildings, renovating the largest laboratory building on the Tifton Campus (B001), and upgrading utility and roadway infrastructure (Attachment 1: Figures 2 and 3.1 through 3.3).

Extant buildings and structures associated with the campus vary in size, materials, and age (Table 1; Attachment 1: Figure 4). There are six one-story, brick masonry buildings on the USDA-ARS Tifton Campus constructed in the 1960s. In addition to buildings, there are 17 additional structures and equipment on site including storage sheds, mobile storage units, outdoor cold storage units, and greenhouses, which serve as agriculture research space, office space, and storage. The support structures were constructed between the 1960s and 2000s in response to the changing needs of the researchers.

Consultation between USDA-ARS and the Georgia Historic Preservation Division (HPD), which serves as the State Historic Preservation Office (SHPO), resulted in a determination that the USDA-ARS Tifton Campus is eligible for inclusion in the National Register of Historic Places (NRHP). Though the

buildings are not individually NRHP eligible, the complex maintains associations with defined historic contexts and agricultural research endeavors and is similar aesthetically to contributing features of the adjacent NRHP-eligible University of Georgia (UGA) Tifton Historic district. As a result, the permanent and recognizable historic-age components of the USDA-ARS Tifton Campus are NRHP-eligible as contributing resources to the district. The resources are significant under Criterion A in the areas of agriculture and education and under Criterion C as examples of purpose-driven, research-related architecture, significant for their form, function, and place within the larger campus landscape rather than for individual design or stylistic qualities. The SHPO determined the proposed modernization Project would have an adverse effect on the NRHP-eligible resources as defined in Section 106 of the National Historic Preservation Act (NHPA) [36 CFR Part 800.5(a)(2)].

### Development of a Memorandum of Agreement

To account for the anticipated adverse effect to the NRHP-eligible USDA-ARS Tifton Campus, a Memorandum of Agreement (MOA) will be prepared to summarize the list of measures the USDA-ARS and other responsible parties will undertake as part of the Project to avoid, minimize, or mitigate impacts on historic (NRHP-eligible) resources. Table 1 lists the buildings and structures at the campus, including their name, NRHP eligibility status, and proposed demolition or renovation activities, as relevant. The buildings' locations are depicted on the figures in Attachment 1, and representative photographs are included as Attachment 2.

**Table 1: Buildings on USDA-ARS Tifton Campus**

Building	Building Purpose	Year Constructed	Proposed Action	Description of Proposed Action	NRHP Eligibility Determination
B001	Laboratories	1962	Renovate	Replace outdated infrastructure, including full HVAC replacement, ceiling and lighting replacement, main switchgear replacement, and minor interior renovations and demolition of non-load bearing walls.	Contributing (NRHP Criteria A and C)
B002	Service Shop	1962	No Action	N/A	Contributing (NRHP Criteria A and C)
B003	Headhouse and Greenhouses	1962	No Action	N/A	Contributing (NRHP Criteria A and C)
B004	CPMRU Insect Rearing Annex	1965	No Action	N/A	Contributing (NRHP Criteria A and C)
B006 (two buildings)	Warehouses	2002	No Action	N/A	Not Eligible/Non-Contributing
B007	Chemical Storage	1965	No Action	N/A	Contributing (NRHP Criteria A and C)
B008	Laboratory/Insectary Field Lab	1965	No Action	N/A	Contributing (NRHP Criteria A and C)
B013	Equipment Storage	1972	No Action	N/A	Contributing (NRHP Criteria A and C)

Building	Building Purpose	Year Constructed	Proposed Action	Description of Proposed Action	NRHP Eligibility Determination
B015	Insect Laboratory	1974	No Action	N/A	Contributing (NRHP Criteria A and C)
B057	Auxiliary Building	Post-1993	No Action	N/A	Not Eligible/Non-Contributing
B059	Hazardous Material Waste Storage	1980s	Demolish and reconstruct at new location	Location of new drying barns	Not Eligible/Non-Contributing
B066	Shed	1980s	No Action	N/A	Not Eligible/Non-Contributing
B084	Chemical Storage	1980s	Demolish and Reconstruct	Location of new drying barns. A new chemical storage building would be constructed adjacent to B002	Not Eligible/Non-Contributing
B089	Drying Barns	Post 1972	Demolish and Reconstruct	Location of new hazardous material waste storage building. New drying barns will be constructed where B084 and B059 are currently located.	Not Eligible/Non-Contributing
B091	Shed next to greenhouse	2000	Demolish and Reconstruct	Location of new Support Building, new Laboratory Building, and new roadway alignment	Not Eligible/Non-Contributing
B092	Hoop Houses	Post 1993	Demolish and Reconstruct	Location of new Support Building, new Laboratory Building, and new roadway alignment	Not Eligible/Non-Contributing
B093	Drying Barns	Post 1972	Demolish and Reconstruct	Location of new hazardous material waste storage building. New drying barns will be constructed where B084 and B059 are currently located.	Not Eligible/Non-Contributing
B094	Oil Storage	2000	No Action	N/A	Not Eligible/Non-Contributing

### Consulting Party Request

With this letter, USDA-ARS is seeking coordination with your agency as a consulting party. This designation does not imply that your agency either supports the proposed Project or has any special expertise with respect to evaluation of the proposed Project. Consulting parties have certain rights and obligations under the NHPA and its implementing regulations at 36 CFR Part 800. By becoming a consulting party, you will be actively informed of steps in the Section 106 process, and you will be asked to participate in:

- development of the MOA, including identification of potential mitigative measures
- define additional survey requirements, including areas of potential effect (APEs) based on proposed demolition plans in relation to other historic or archaeological resources at the facility
- vetting and approval of mitigation measures once implemented



To become a consulting party, please respond to Nicholas Girken at [Nicholas.Girken@usda.gov](mailto:Nicholas.Girken@usda.gov) by April 29, 2022. If you do not respond within this timeframe, you may request consulting party status in the future, but the Project may continue to advance without your input. If you are requesting consulting party status, we ask that your agency nominate one representative and an alternate to participate on behalf of the group. In your response, please provide the contact information for your agency's primary point of contact and the alternate to allow us to update our contact list.

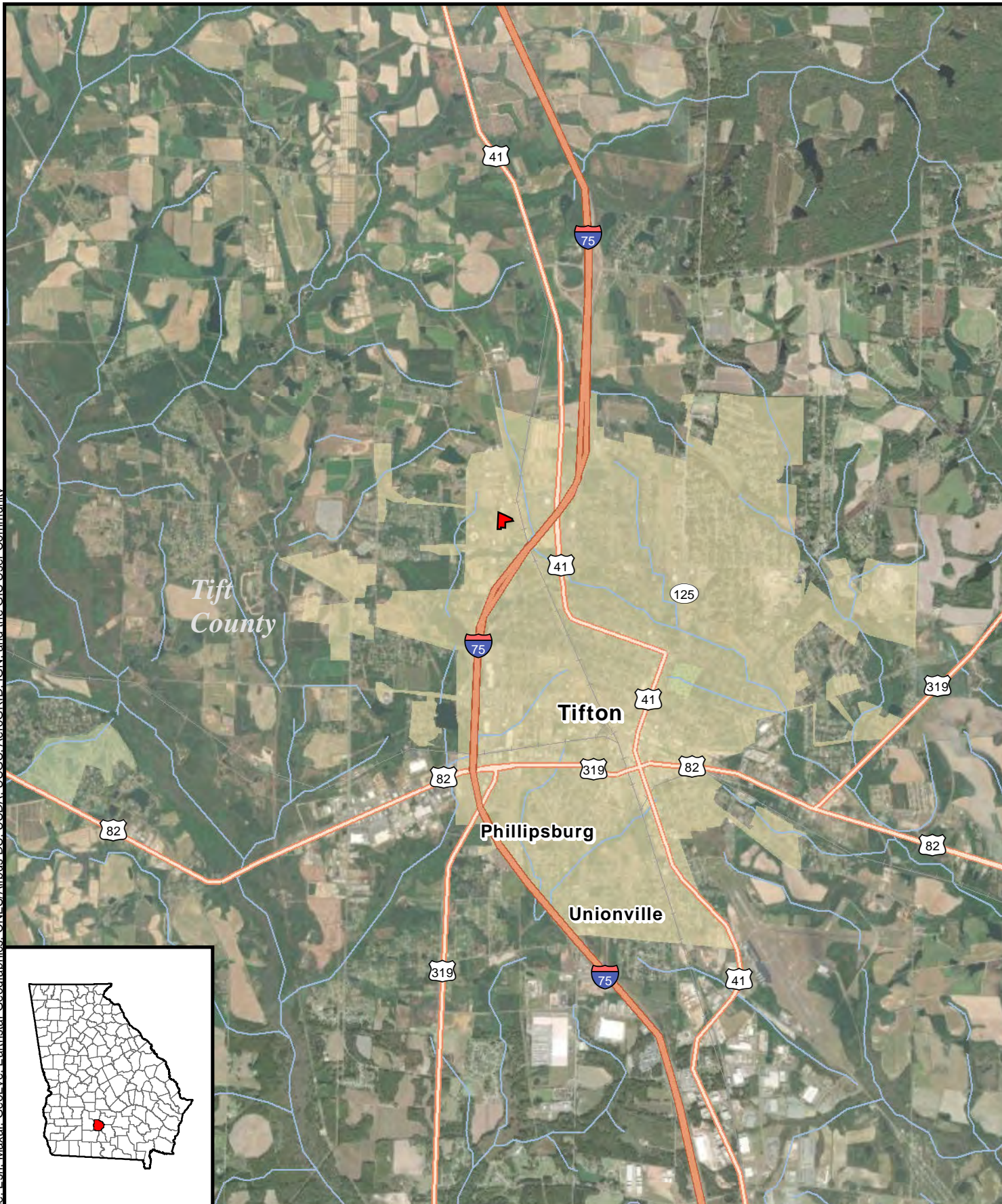
Sincerely,

Nicholas Girken  
Engineering Project Manager (EPM); Contracting Officer Representative (COR)  
USDA-ARS

**Nicholas  
Girken** Digitally signed by  
Nicholas Girken  
Date: 2022.03.29  
14:06:53 -04'00'

Cc: Santiago Martinez, Georgia SHPO  
Shauna Stotler, USACE  
Andrea Farmer, USACE

## Attachment 1 – Figures



 Project Boundary

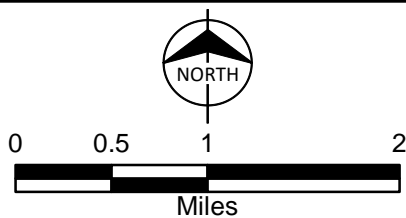
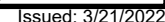


Figure 1  
Project Location  
USDA-ARS  
Laboratory Modernization  
Tift County, Georgia







NW Approach



NE Birdseye

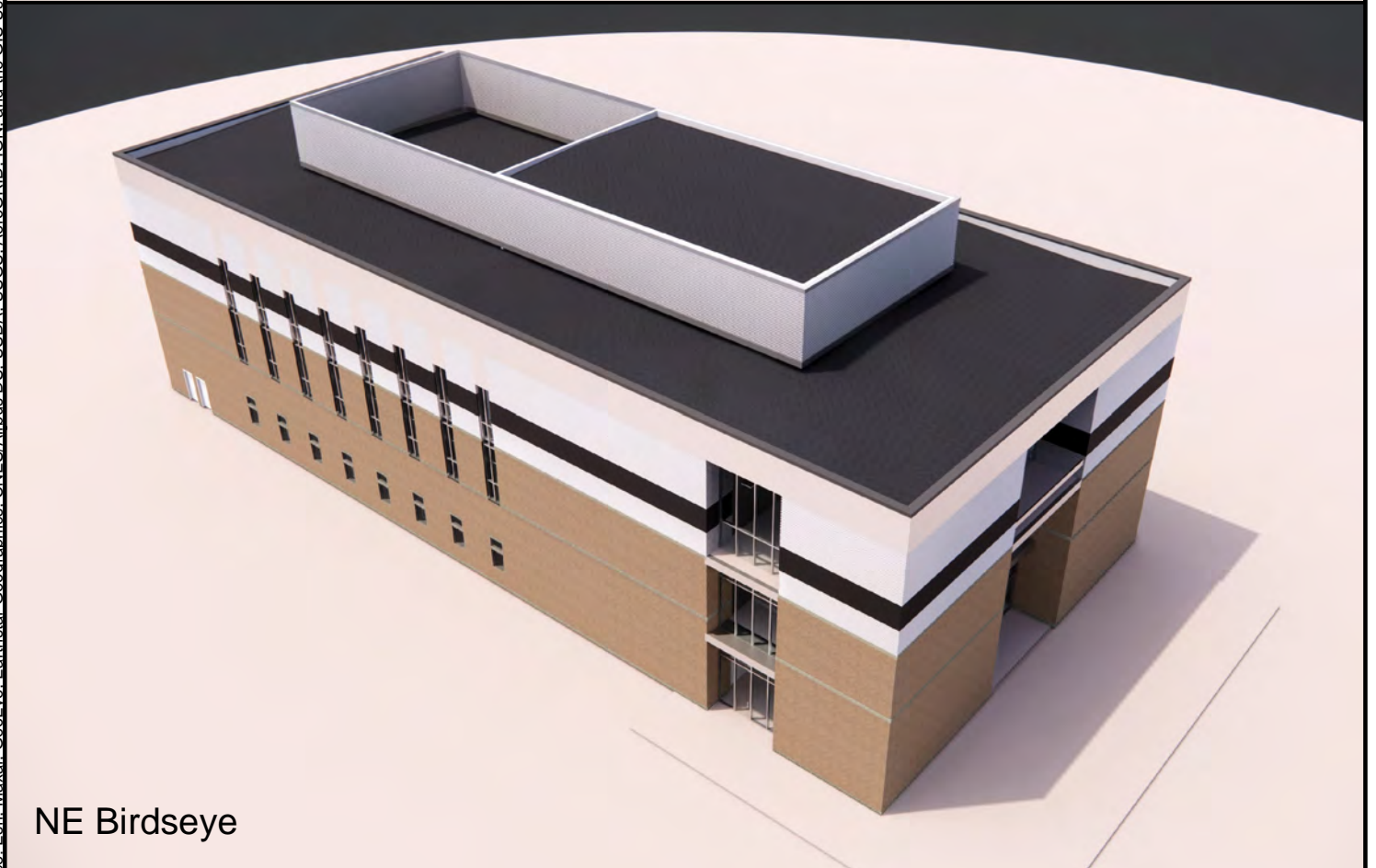
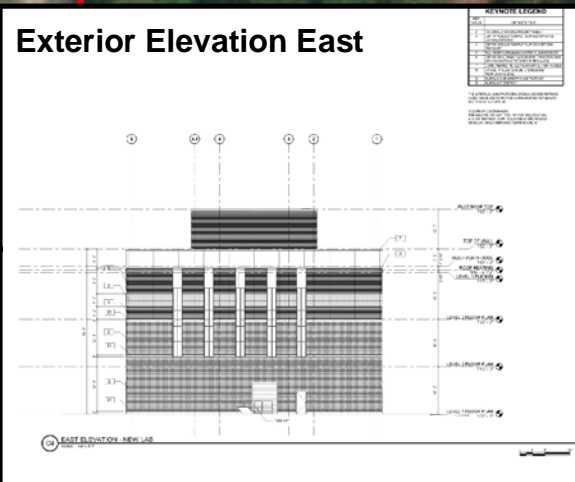
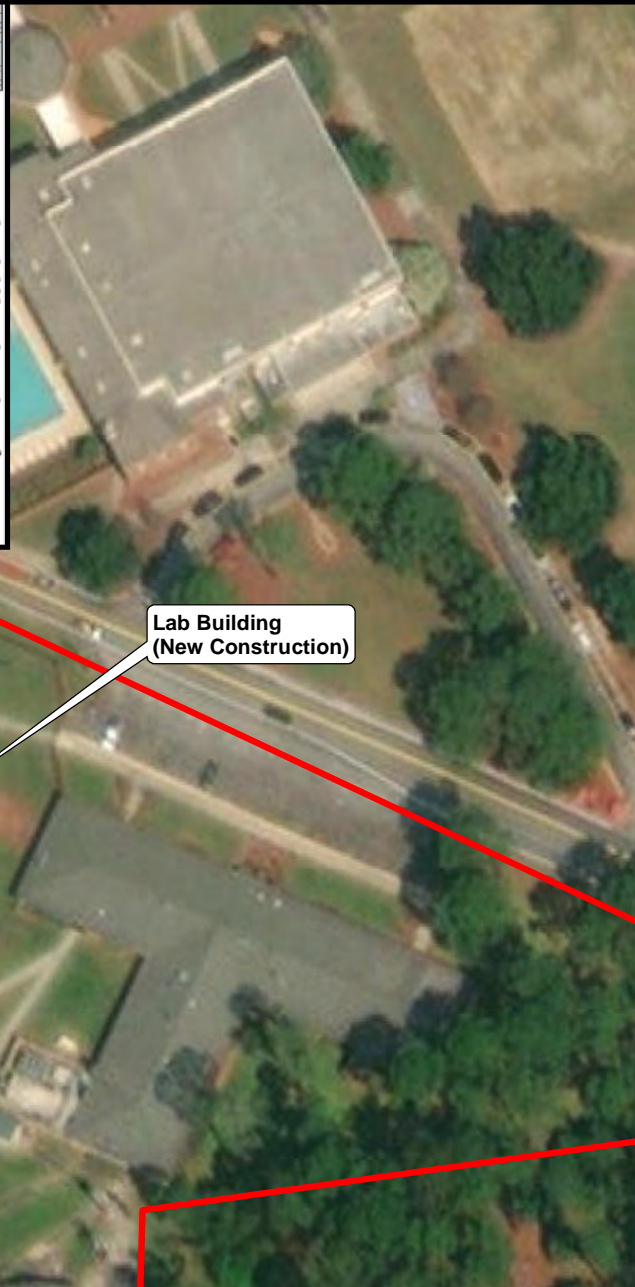
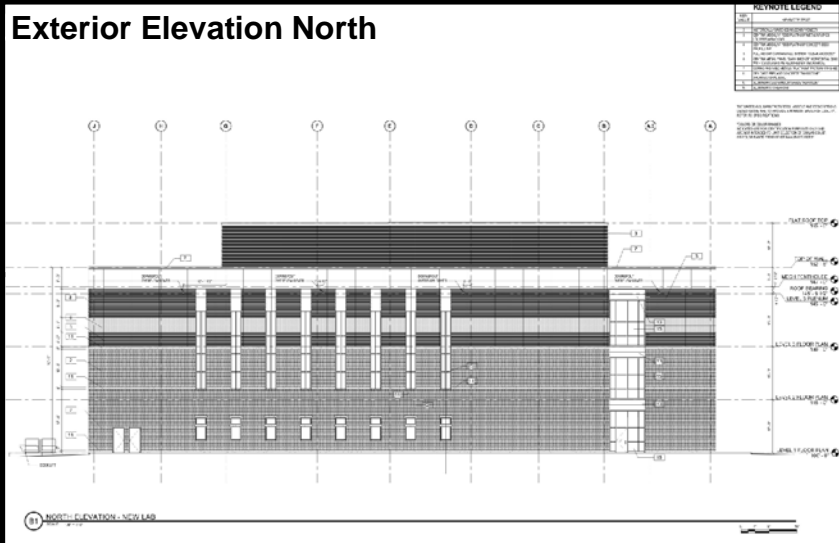




Figure 3-1  
Lab Building Renderings  
USDA-ARS  
Laboratory Modernization  
Tift County, Georgia



 New Construction  
 Project Boundary

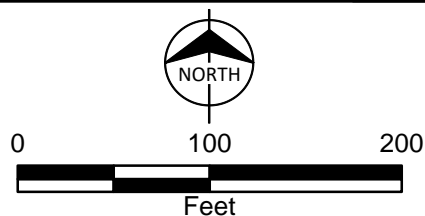
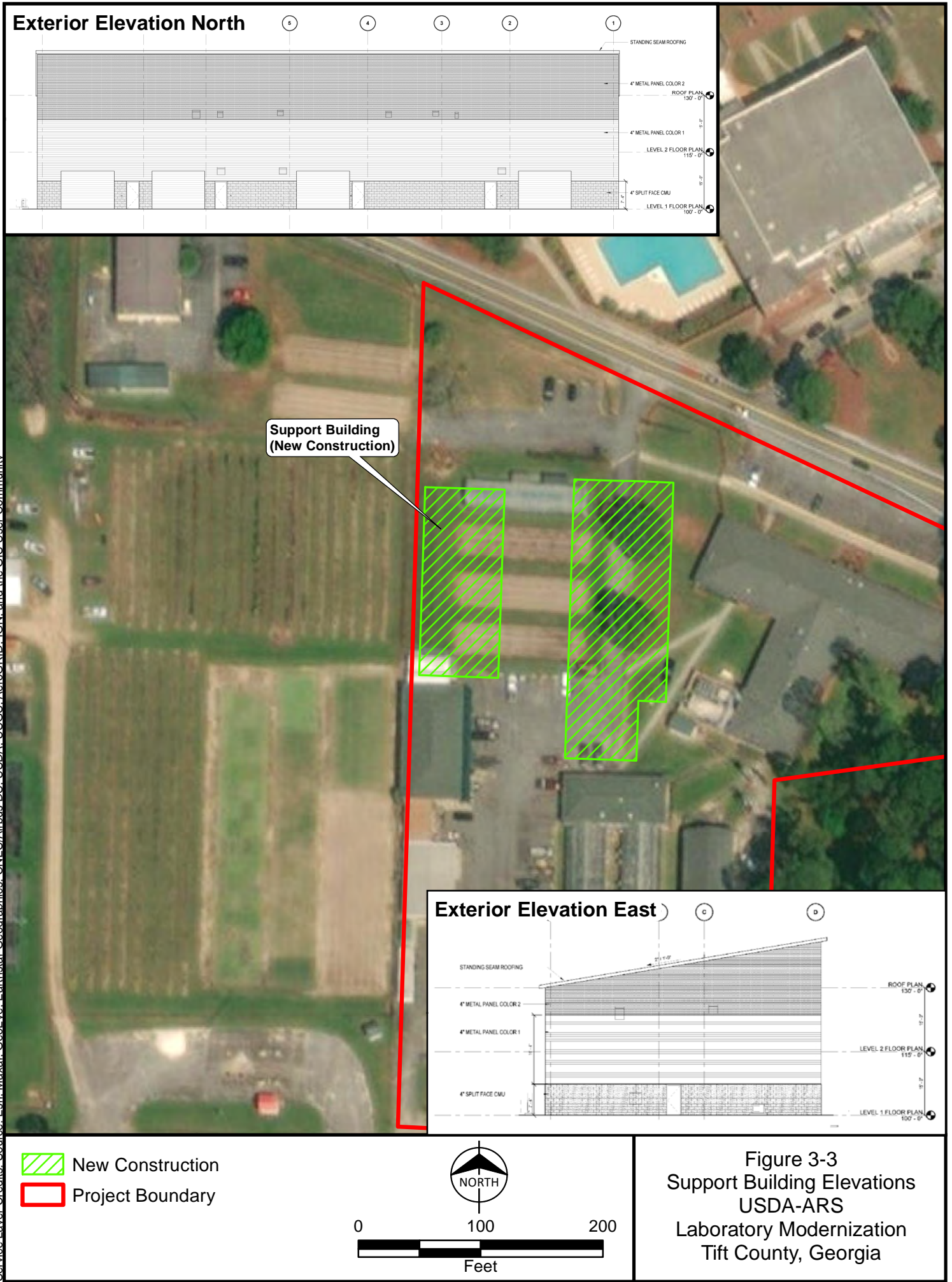


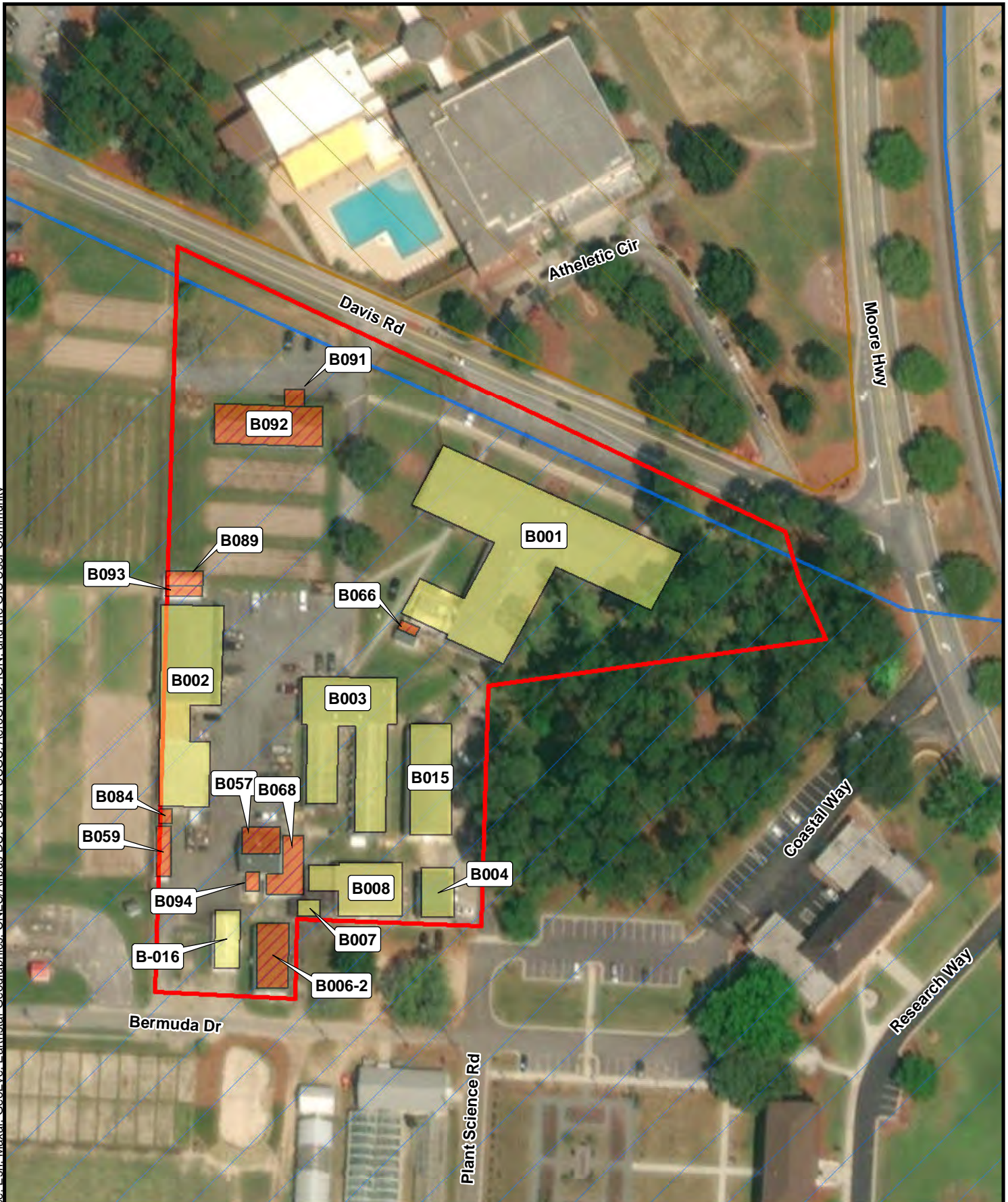
Figure 3-2  
Lab Building Elevations  
USDA-ARS  
Laboratory Modernization  
Tift County, Georgia



Path: Clients\ANFUSCOE\Sas\124975\_USDA-ARS-LAB\Studies\Geospatial\DataFiles\ArcDocs\CP\_Invitation\_Letter\Figure33\_RenderingSupport\_Tifton\_CP.mxd gacox 3/10/2022  
Service Layer Credits: Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community







- Contributing (NRHP Criteria A and C)
- Not Eligible / Non-Contributing
- Approximate NRHP-Eligible District Boundary (UGA campus)
- Abraham Baldwin Agricultural College
- Project Boundary

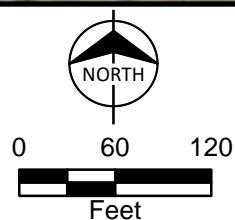


Figure 4  
 Resource Location Map  
 USDA-ARS  
 Laboratory Modernization  
 Tift County, Georgia



## Attachment 2 – Photographs



Photograph 1: Overview of B001, primary façade, camera facing southwest.



Photograph 2: View of main entrance, B001, camera facing southeast.





Photograph 3: Overview of B001, camera facing southwest.



Photograph 4: View of B001, camera facing southeast.



Photograph 5: Overview of B002, camera facing northwest.



Photograph 6: View of B002, camera facing southwest.





Photograph 7: View of B003 headhouse, camera facing south.



Photograph 8: View of B003 greenhouse, camera facing northwest.



Photograph 9: View of B003 greenhouses, camera facing northeast.



Photograph 10: View of B004, camera facing southwest.





Photograph 11: View of B008, camera facing east.



Photograph 12: View of B013, camera facing south.





Photograph 13: View of B015, camera facing northwest.



Photograph 14: View of B015, camera facing south.



Photograph 15: View of B016, camera facing southeast.



Photograph 16: View of B059, camera facing north.





Photograph 17: View of B059, camera facing northwest.



Photograph 18: View of B066, camera facing east.





Photograph 19: View of B068, camera facing southwest.



Photograph 20: View of B084, camera facing west-northwest.



Photograph 21: View of B089, camera facing south.



Photograph 22: View of B091 (non-historic-age; left) and B092 (hoop house), camera facing southeast.





Photograph 23: View of hoop house remnants (left) and B092 (right), camera facing southwest.



Photograph 24: View of B093 (left) and B089 (right), camera facing west.





Photograph 25: View of B057 (left, non-historic-age) and B094 (right), camera facing west.



Photograph 26: View of B094, camera facing west.





Photograph 27: View towards Davis Road from main entry drive, camera facing north.



Photograph 28: View towards B002 from main entry drive, camera facing southwest.





Photograph 29: Setting overview towards Moore Highway, camera facing east.



Photograph 30: Setting overview towards Davis Road, camera facing north.





Photograph 31: Setting view towards Coastal Way, camera facing east.



Photograph 32: Setting view towards B015 and B001, camera facing north.





Photograph 33: Setting overview of Project from Davis Road, camera facing east.



Photograph 34: Overview of campus from Davis Road, camera facing south.





Photograph 35: Setting view from Davis Road towards B001, camera facing southwest.



Photograph 36: View from Bermuda Drive towards campus, camera facing east.



### Consulting Party List

Business/Organization	Contact	Email / Phone Number	Address	Letter/Email Sent	Response	Notes
Alabama-Quassarte Tribal Town	Janice Lowe THPO	<a href="mailto:jlowe@alabama-quassarte.org">jlowe@alabama-quassarte.org</a> 405-452-3881 918-913-1702	PO Box 187 Wetumka, OK 74883	3/29/2022 Letter Mailed Received 4/14/2022		
	Nelson Harjo Chief	<a href="mailto:nharjo@alabama-quassarte.org">nharjo@alabama-quassarte.org</a> 405-452-3987	PO Box 187 Wetumka, OK 74883	3/29/2022 Letter Mailed Received 4/14/2022		
Coushatta Tribe of Louisiana	David Sickey Chairman	<a href="mailto:dsickey@coushatta.org">dsickey@coushatta.org</a> 337-584-1401	PO Box 818 Elton, LA 70532	3/29/2022 Letter Mailed Received 4/2/2022		
	Linda Langley THPO	<a href="mailto:KDawsey@coushatta.org">KDawsey@coushatta.org</a> 337-584-1560	PO Box 10 Elton, LA 70532	3/29/2022 Letter Mailed Received 4/2/2022		
Muscogee (Creek) Nation	David Hill Principal Chief	<a href="mailto:dhill@mcn-nsn.gov">dhill@mcn-nsn.gov</a> 800-482-1979	PO Box 580 Okmulgee, OK 74447	3/29/2022 Letter Mailed Received 4/4/2022		
	Corain Lowe-Zepeda THPO	section106@mcn-nsn.gov; clowe@mcn-nsn.gov; lwendt@mcn-nsn.gov; <a href="http://thunt@MuscogeeNation.com">thunt@MuscogeeNation.com</a> 918-732-7835	PO Box 580 Okmulgee, OK 74447	3/29/2022 Letter Mailed Received 4/4/2022		
Kialegee Tribal Town	David Cook THPO	<a href="mailto:David.cook@kialegeetribes.net">David.cook@kialegeetribes.net</a> 405-452-3262 ext. 15	PO Box 332 Wetumka, OK 74883	3/29/2022 Letter Mailed Received 4/4/2022		
Poarch Band of Creek Indians	Larry Haikey THPO	<a href="mailto:THPO@pci-nsn.gov">THPO@pci-nsn.gov</a> 251-368-9136 ext. 2532	5811 Jack Springs Road Atmore, AL 36502	3/29/2022 Letter Mailed Received 4/4/2022		
Seminole Nation of Oklahoma	Ben Yahola THPO	<a href="mailto:Yahola.b@sno-nsn.gov">Yahola.b@sno-nsn.gov</a> 405-257-7200 / 405-234-5218	PO Box 1499 Wewoka, OK 74884	3/29/2022 Letter Mailed Received 4/4/2022		
Thlopthlocco Tribal Town	Galen Cloud THPO	<a href="mailto:thpo@tttown.org">thpo@tttown.org</a> 918-560-6198	PO Box 188 Okemah, OK 74859	3/29/2022 Letter Mailed Received 4/4/2022		
Southern Georgia Regional Commission	Michael Jacobs Senior Planner	mvjacobs@sgrc.us 912-285-6097 229-333-5277	1725 S. Georgia Parkway West Waycross, Georgia 31503	3/29/2022 Letter Mailed 3/30/2022 Email Sent Received 4/4/2022		
UGA	Lara Mathes Director of Campus Planning	<a href="mailto:lmathes@uga.edu">lmathes@uga.edu</a> 706-542-3605	University of Georgia, Office of University Architects 210 River Road, Athens, GA 30602	3/29/2022 Letter Mailed 3/30/2022 Email Sent Received 4/6/2022		

### Consulting Party List

Business/Organization	Contact	Email / Phone Number	Address	Letter/Email Sent	Response	Notes
	Scott Messer Director of Historic Preservation	<a href="mailto:smesser@uga.edu">smesser@uga.edu</a> 706-542-3605	University of Georgia, Office of University Architects 210 River Road, Athens, GA 30602	3/29/2022 Letter Mailed 3/30/2022 Email Sent Received 4/12/2022	Accepted	
	Dr. Michael D. Toews Assistant Dean	<a href="mailto:mtoews@uga.edu">mtoews@uga.edu</a> 229-386-7058	4602 Research Way Tifton, Georgia 31793	3/29/2022 Letter Mailed 3/30/2022 Email Sent Received 4/7/2022	Accepted	
Tifton Historical Preservation Commission	Attn: Crystal Gaillard	229-391-3950	204 North Ridge Avenue Tifton, GA 31794	3/29/2022 Letter Mailed		<p>Tifton Historical Preservation Commission falls under the Tifton Community Development Department. LC spoke to Dalton in the Community Development Department he said all of the commissioner's letters will go to Crystal Gaillard and then she will pass them out to the appropriate commissioners</p> <p>Address letters to "Whom it may concern" and send the letter to Crystal Gaillard</p> <p>Board members of the Tifton Historical Preservation Commission:</p> <p>Adam Simmons Justin Golden Louise Woodham Jeff Robbins Ann Clayton Jenny Harper Franklin Guill</p>
Tifton Community Development Department	Crystal Gaillard Community Development Director	<a href="mailto:cgaillard@tifton.net">cgaillard@tifton.net</a> 229-382-6231	204 North Ridge Avenue Tifton, GA 31794	3/29/2022 Letter Mailed 3/30/2022 Email Sent		Tifton Historical Preservation Commission falls under the Tifton Community Development Department. LC spoke to Dalton in the Community Development Department he said all of the commissioner's letters will go to Crystal Gaillard and then she will pass them out to the appropriate commissioners
	Cherry Plair Zoning Administrator	<a href="mailto:cplair@tifton.net">cplair@tifton.net</a> 229-382-6231	204 North Ridge Avenue Tifton, GA 31794	3/29/2022 Letter Mailed 3/30/2022 Email Sent		
Tift County Board of Commissioners	Jim Carter Tift County Manager	<a href="mailto:jim.carter@tiftcounty.org">jim.carter@tiftcounty.org</a> 229-386-7850	225 North Tift Avenue, Room 204 Tifton, GA 31794	3/29/2022 Letter Mailed 3/30/2022 Email Sent Received 4/4/2022		
	Greg Wood, District 6 County Commissioner	229-472-3094 <a href="mailto:greg.wood@tiftcounty.org">greg.wood@tiftcounty.org</a>	225 North Tift Avenue, Tifton, GA 31794	3/29/2022 Letter Mailed		

Consulting Party List

Business/Organization	Contact	Email / Phone Number	Address	Letter/Email Sent	Response	Notes
				3/30/2022 Email Sent Received 4/8/2022		
SHPO	Santiago Martinez, Georgia SHPO	404-486-6425 <a href="mailto:Santiago.martinez@dca.ga.gov">Santiago.martinez@dca.ga.gov</a>	60 Executive Park South, NE Atlanta, GA 30329	4/22/2022 Email Sent	Accepted	





**Advisory Council on Historic Preservation  
Electronic Section 106 Documentation Submittal System (e106) Form  
MS Word format**

**Send to: *e106@achp.gov***

**Please review the instructions at [www.achp.gov/e106-email-form](http://www.achp.gov/e106-email-form) prior to completing this form. Questions about whether to use the e106 form should be directed to the assigned ACHP staff member in the Office of Federal Agency Programs.**

**I. Basic information**

**1. Purpose of notification.** Indicate whether this documentation is to:

- ☒ Notify the ACHP of a finding that an undertaking may adversely affect historic properties
- ☒ Invite the ACHP to participate in a Section 106 consultation
- ☐ Propose to develop a project Programmatic Agreement (project PA) for complex or multiple undertakings in accordance with 36 C.F.R. 800.14(b)(3)
- ☐ Supply additional documentation for a case already entered into the ACHP record system
- ☐ File an executed MOA or PA with the ACHP in accordance with 800.6(b)(iv) (where the ACHP did not participate in consultation)
- ☐ Other, please describe

[Click here to enter text.](#)

**2. ACHP Project Number** (If the ACHP was previously notified of the undertaking and an ACHP Project Number has been provided, enter project number here and skip to Item 7 below): N/A

**3. Name of federal agency** (If multiple agencies, list them all and indicate whether one is the lead agency):

United States Department of Agriculture, Agricultural Research Service (USDA-ARS) (lead agency) and  
United States Army Corps of Engineers (USACE) Savannah District

**4. Name of undertaking/project** (Include project/permit/application number if applicable):

USDA-ARS Tifton Campus Consolidation and Modernization Project, Davis Road, Tifton, Tift County,  
Georgia

**5. Location of undertaking** (Indicate city(s), county(s), state(s), land ownership, and whether it would occur on or affect historic properties located on tribal lands):

Facility is located in Tifton, Tift County, Georgia (Attachment 1: Figure 1). The property is owned by the Federal government but associated with the adjacent University of Georgia (UGA) campus.

ADVISORY COUNCIL ON HISTORIC PRESERVATION

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

Phone: 202-517-0200 ☐ Fax: 202-517-6381 ☐ [achp@achp.gov](mailto:achp@achp.gov) ☐ [www.achp.gov](http://www.achp.gov)

**6. Name and title of federal agency official and contact person for this undertaking, including email address and phone number:**

Nicholas Girken  
 Engineering Project Manager/Contracting Officer Representative  
 USDA-ARS Administrative and Financial Management  
 5601 Sunnyside Avenue  
 Beltsville, MD 20705  
 Nicholas.Girken@usda.gov  
 (301) 504-1206

**II. Information on the Undertaking\***

**7. Describe the undertaking and nature of federal involvement** (if multiple federal agencies are involved, specify involvement of each):

The 5.25-acre USDA-ARS Tifton Campus supports the Southeast Watershed Research Unit (SEWRU) and the Crop Genetics and Breeding Research Unit (CGBRU) research facilities. When SEWRU was established in 1966, its mission was to “identify and characterize the elements that control flow of water from watersheds in the southeastern U.S. to provide information for better management of water resources on those watersheds” (Thomas 1993). SEWRU's water resources research has expanded to include systems research on the feedbacks between agricultural practices, environmental conditions, pest management, and the role water plays in linking these components of agricultural systems. CGBRU conducts research to improve breeding methods and plant genetics for improved crop yields, enhanced environmental quality, and pest management strategies. Research is conducted on warm season grasses (forage and turf), corn, peanuts, and sorghum (Butler et al. 1993). The USDA-ARS Tifton Administrative Officer and staff serve both the SEWRU and CGBRU, as well as the National Peanut Research Laboratory in Dawson, Georgia (Denby 1993).

The CGBRU and administrative staff occupy administrative and laboratory buildings on the USDA-ARS Tifton Campus and on the adjacent UGA campus. The USDA-ARS lease with UGA for these buildings is expiring. The USDA-ARS is proposing a consolidation and modernization project for the Tifton Campus. The Project would provide more laboratory and administrative space on the USDA-ARS Tifton Campus and would reduce the amount of leased space from UGA. The proposed Project would include demolishing outdated structures, constructing new buildings, renovating the largest laboratory building on the Tifton Campus (B001), and upgrading utility and roadway infrastructure (Attachment 1: Figure 2).

The proposed Project involves the following improvement, removal, and/or construction of new facilities to support the ongoing SEWRU and CGBRU missions (Attachment 1: Figure 2):

- Renovation of Building 001 – The one story, brick-masonry building containing research laboratories and office space was constructed in 1962 and renovated in 1978 and 1982. The proposed 2022 renovation would include replacing the ceiling tiles, installing new lights, and replacing the HVAC system and ductwork. The ceiling and lights would be similar in appearance to the existing. Additionally, four non-load-bearing walls would be demolished to expand laboratory and office space. No exterior changes are proposed.
- Realignment of the north-south roadway transecting the USDA-ARS Tifton Campus – Demolishing existing non-historic-age equipment (B091 and B092) would allow for a new entrance and realigned roadway through the USDA-ARS Tifton Campus. The realignment would

eliminate blind corners and driving safety concerns while providing space to construct new buildings.

- Construction of a new three-story laboratory building with connector to B001 in the footprint of existing non-historic-age equipment (B091 and B092). The three-story laboratory building would be of steel frame construction with brick veneer and metal paneling, and a standing seam mono-sloped roof.
- Construction of a new two-story support building to house laboratory supplies and equipment. The support building would be constructed in the footprint of B091 and B092 and would be of steel frame and concrete masonry unit construction with a standing seam metal roof. It would house an overhead crane to bring equipment to the second-floor storage areas and would also include small field science processing areas.
- Construct new parking areas north and east of B001 and north of the new support building – Additional parking spaces would be required to support the proposed consolidation efforts. Additional new parking lots would be constructed in the maintained lawn/undeveloped spaces in the northern portion of the campus.
- Two existing drying barns would be relocated, and several prefabricated drying barns would be acquired to consolidate all drying barns at the campus. Drying barns would be relocated to the southwest portion of the campus where B084 and B059 are currently located. B059 (Hazardous Material Waste Storage) would be relocated north of B002 where B089 and B093 are currently located. B089 and B093 are proposed for demolition.

## **8. Describe the Area of Potential Effects (APE):**

The Physical APE includes all areas of proposed ground disturbance and new construction as well as the footprint of Building 001, which is planned for interior renovations. The Physical APE comprises approximately 2.46 acres. The Non-Physical APE developed to account for potential visual effects to historic (National Register of Historic Places [NRHP]-listed or eligible) properties comprises the limits of the approximately 5.25-acre research campus (Attachment 1: Figure 3).

## **9. Describe steps taken to identify historic properties:**

An archaeological background study and NRHP eligibility and effects assessment for the USDA-ARS Tifton Campus were conducted by a Secretary of the Interior (SOI)-qualified architectural historian and archaeologist. A copy of the survey document and the Georgia State Historic Preservation Officer's response are included in Attachment 2.

## **10. Describe the historic property (or properties) and any National Historic Landmarks within the APE (or attach documentation or provide specific link to this information):**

Though none of the buildings qualify for individual NRHP listing, due to their associations with defined historic contexts and agricultural research endeavors and their overall aesthetic similarity to contributing features of the adjacent NRHP-eligible UGA Tifton Historic District, the permanent and recognizable historic-age components of the USDA-ARS Tifton Campus (B001, B002, B003, B004, B007, B008, B013, and B015) were determined eligible for NRHP inclusion as contributing resources to the district. The resources are significant under Criterion A in the areas of agriculture and education and under Criterion C as examples of purpose-driven, research-related architecture, more significant for their form, function, and



place within the larger campus landscape than for their individual design or stylistic qualities (see Attachment 2).

### 11. Describe the undertaking's effects on historic properties:

After review of the survey and documentation materials, the Georgia SHPO determined that as currently proposed, the project constitutes an **adverse effect** to historic properties that are eligible for or listed in the NRHP, as defined in 36 CFR Part 800.5(a)(2). The scale and massing of the new construction, the alteration of exterior circulation spaces, including both automobile and pedestrian, away from the historic buildings and established hierarchy of spaces, and the alteration of the historic buildings' relationship to the setting and landscape is not consistent with the SOI's *Standards for the Treatment of Historic Properties*.

### 12. Explain how this undertaking would adversely affect historic properties (include information on any conditions or future actions known to date to avoid, minimize, or mitigate adverse effects):

The scale and massing of the new construction, the alteration of exterior circulation spaces, including both automobile and pedestrian, away from the historic buildings and established hierarchy of spaces, and the alteration of the historic buildings' relationship to the setting and landscape is not consistent with the SOI's *Standards for the Treatment of Historic Properties*. A Memorandum of Agreement (MOA) is proposed to consider mitigative and minimization measures as required under Section 106.

### 13. Provide copies or summaries of the views provided to date by any consulting parties, Indian tribes or Native Hawai'ian organizations, or the public, including any correspondence from the SHPO and/or THPO.

Attachment 3 includes a copy of the consulting party invitation letter as well as emails and letters from entities who responded.

## III. Additional Information

### 14. Please indicate the status of any consultation that has occurred to date, including whether there are any unresolved concerns or issues the ACHP should know about in deciding whether to participate in consultation. Providing a list of consulting parties, including email addresses and phone numbers, if known, can facilitate the ACHP's review response.

**Consulting Parties Summary Table**

Organization/ Agency	Contacts and Title	Email/Phone Number	Address	Status
Alabama-Quassarte Tribal Town	Janice Lowe (THPO); Nelson Harjo (Chief)	jlowe@alabama-quassarte.org (405) 452-3881 (918) 913-1702; nharjo@alabama-quassarte.org (405) 452-3987	PO Box 187 Wetumka, OK 74883	No response to date
Coushatta Tribe of Louisiana	David Sickey (Chairman); Linda Langley (THPO)	dsickey@coushatta.org (337) 584-1401; KDawsey@coushatta.org (337) 584-1560	PO Box 818 Elton, LA 70532; PO Box 10 Elton, LA 70532	No response to date

<b>Organization/ Agency</b>	<b>Contacts and Title</b>	<b>Email/Phone Number</b>	<b>Address</b>	<b>Status</b>
Kialegee Tribal Town	David Cook (THPO)	David.cook@kialegeetribe.net (405) 452-3262 ext. 15	PO Box 332 Wetumka, OK 74883	No response to date
Muscogee (Creek) Nation	David Hill (Principal Chief); Corain Lowe- Zepeda (THPO)	dhill@mcn-nsn.gov (800) 482-1979; section106@mcn-nsn.gov; clowe@mcn-nsn.gov; lwendt@mcn-nsn.gov; thunt@MuscogeeNation.com (918) 732-7835	PO Box 580 Okmulgee, OK 74447	No response to date
Poarch Band of Creek Indians	Larry Haikey (THPO)	THPO@pci-nsn.gov (251) 368-9136 ext. 2532	5811 Jack Springs Road Atmore, AL 36502	No response to date
Seminole Nation of Oklahoma	Ben Yahola THPO	Yahola.b@sno-nsn.gov (405) 257-7200 / (405) 234- 5218	PO Box 1499 Wewoka, OK 74884	No response to date
SHPO	Santiago Martinez, Georgia SHPO	(404) 486-6425 Santiago.martinez@dca.ga.gov	60 Executive Park South, NE Atlanta, GA 30329	Participating
Southern Georgia Regional Commission	Michael Jacobs Senior Planner	mvjacobs@sgrc.us (912) 285-6097 (229) 333-5277	1725 S. Georgia Parkway West Waycross, GA 31503	No response to date
Thlopthlocco Tribal Town	Galen Cloud THPO	thpo@tttown.org (918) 560-6198	PO Box 188 Okemah, OK 74859	No response to date
Tift County Board of Commissioners	Jim Carter (Tift County Manager); Greg Wood (District 6 County Commissioner)	jim.carter@tiftcounty.org (229) 386-7850; (229) 472- 3094 greg.wood@tiftcounty.org	225 North Tift Avenue, Room 204 Tifton, GA 31794	No response to date
Tifton Community Development Department	Crystal Gaillard (Community Development Director); Cherry Plair (Zoning Administrator)	cgaillard@tifton.net (229) 382-6231; cplair@tifton.net (229) 382-6231	204 North Ridge Avenue Tifton, GA 31794	No response to date
Tifton Historical Preservation Commission	Attn: Crystal Gaillard	(229) 391-3950	204 North Ridge Avenue Tifton, GA 31794	No response to date

Organization/ Agency	Contacts and Title	Email/Phone Number	Address	Status
UGA	Lara Mathes (Director of Campus Planning); Scott Messer (Director of Historic Preservation); Dr. Michael D. Toews (Assistant Dean)	lmathes@uga.edu (706) 542-3605; smesser@uga.edu (706) 542-3605; mtoews@uga.edu (229) 386-7058	UGA, Office of University Architects 210 River Road, Athens, GA 30602; UGA, Office of University Architects 210 River Road, Athens, GA 30602; 4602 Research Way Tifton, Georgia 31793	Accepted Consulting Party Status on April 27, 2022
USACE	Andrea Farmer, Archaeologist Savannah District	Andrea.A.Farmer@usace.army. mil	100 West Oglethorpe Ave Savannah, GA 31401	Participating Agency

**15 Does your agency have a website or website link where the interested public can find out about this project and/or provide comments?** Please provide relevant links:

No

**16. Is this undertaking considered a “major” or “covered” project listed on the Federal Infrastructure Projects Permitting Dashboard?** If so, please provide the link:

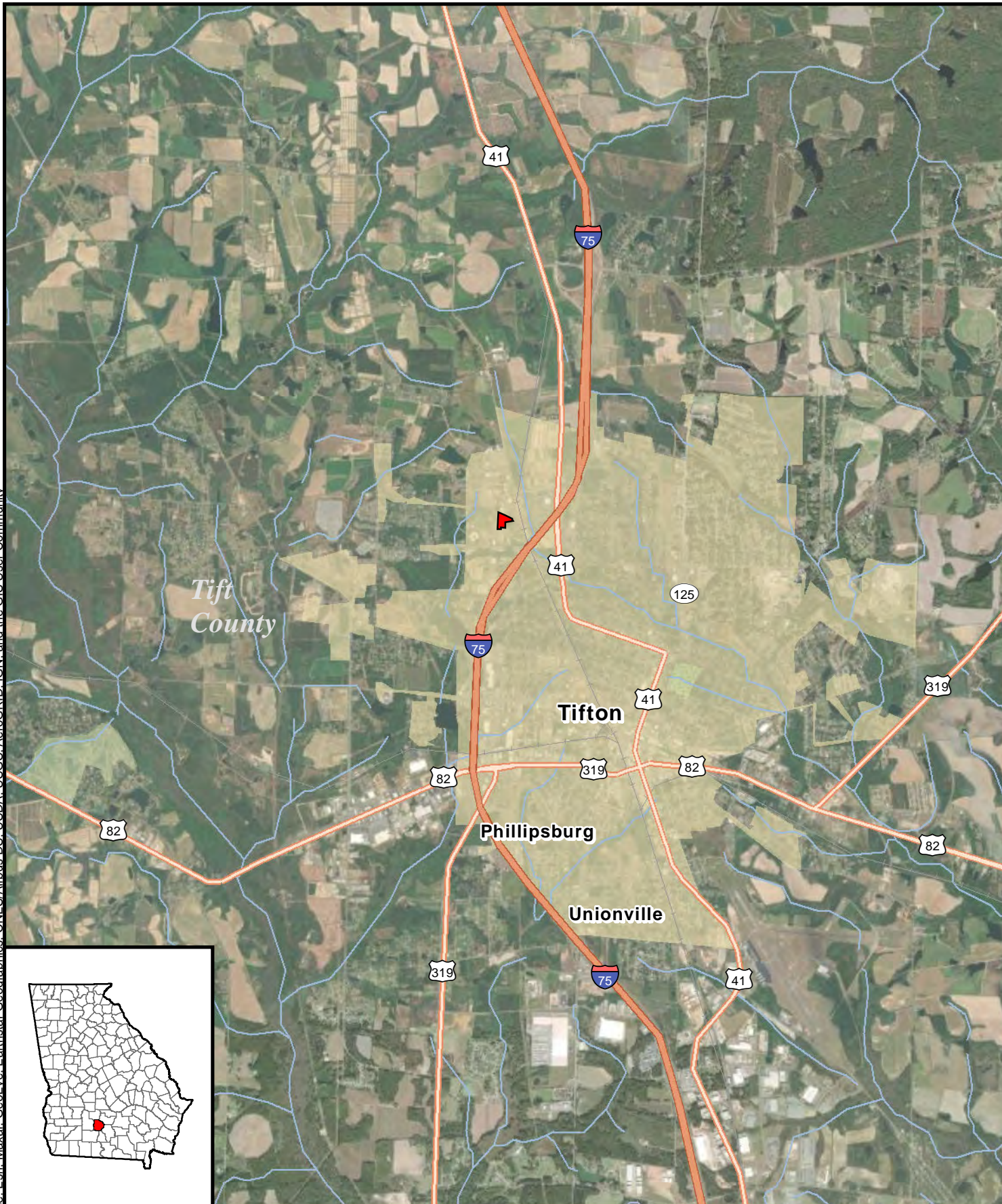
No

**The following are attached to this form** (check all that apply):

- ☒ Section 106 consultation correspondence
- ☒ Maps, photographs, drawings, and/or plans
- ☐ Additional historic property information
- ☒ Consulting party list with known contact information
- ☐ Other:



## **Attachment 1 – Figures**



Project Boundary



0 0.5 1 2  
Miles

Figure 1  
Project Location  
USDA-ARS  
Laboratory Modernization  
Tift County, Georgia





- New Pavement
- Site Boundary
- Proposed Stormwater Pond
- Demolish Building
- Renovate Building
- New Construction

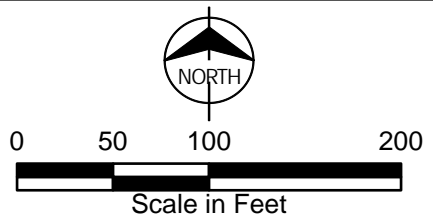


Figure 2  
Proposed Undertaking  
Site Plan Map  
USDA-ARS Laboratory  
Modernization Project  
Tift County, Georgia



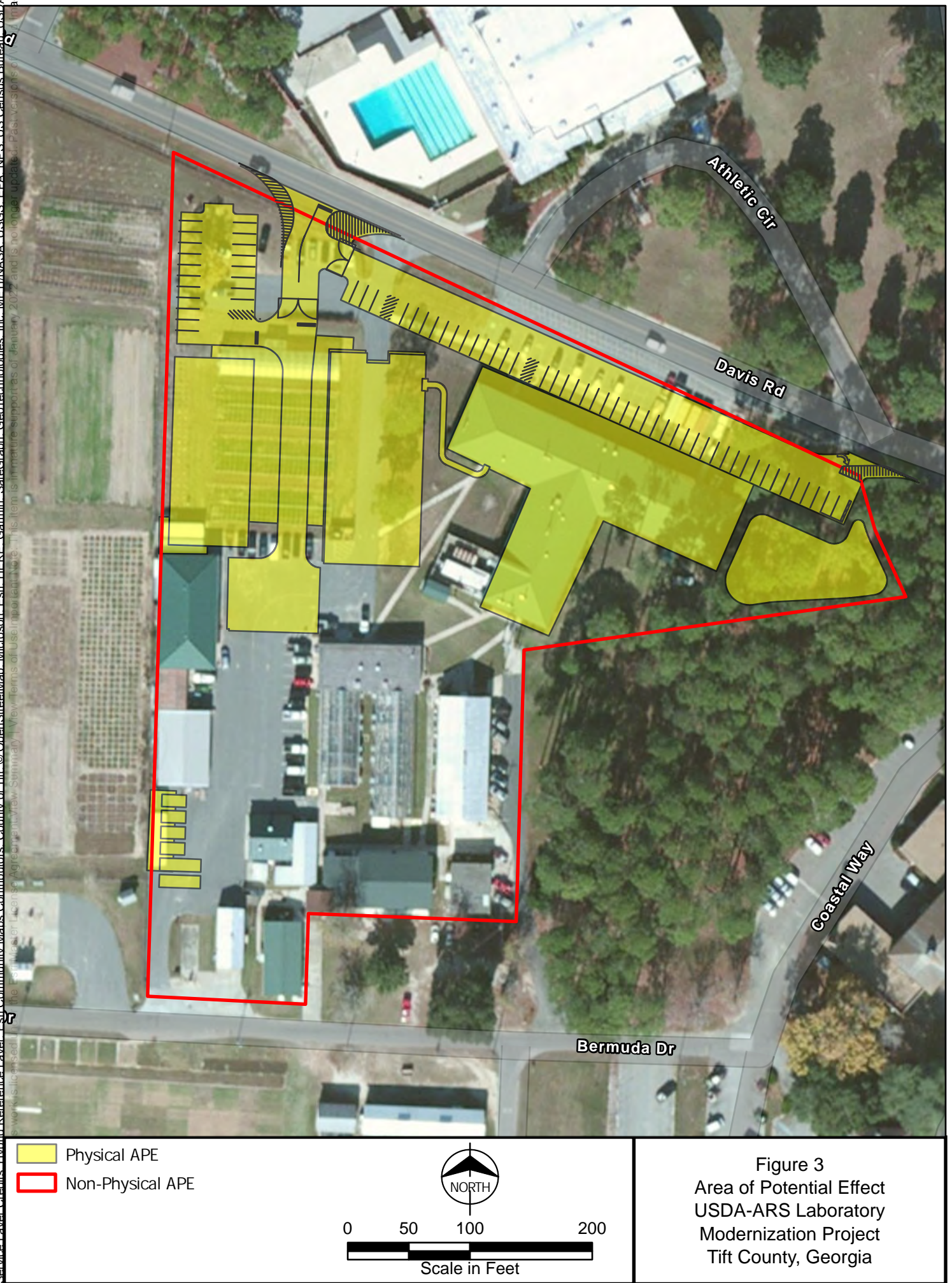


Figure 3  
Area of Potential Effect  
USDA-ARS Laboratory  
Modernization Project  
Tift County, Georgia

## **Attachment 2 – SHPO Consultation**



January 13, 2022

Santiago Martinez  
Environmental Review Historian  
Historic Preservation Division  
Georgia Department of Community Affairs  
60 Executive Park South, NE  
Atlanta, GA 30329

Re: USDA-ARS Laboratory Modernization Project, Davis Road, Tifton HP-210910-003

Dear Mr. Martinez:

This memorandum provides the additional information requested by your office on October 6, 2021 for the proposed U.S. Department of Agriculture - Agricultural Research Service (USDA-ARS) Laboratory Modernization Project (Project) on 262 Davis Road, Tifton, Tift County, Georgia; UTM Zone 17N, Easting 260,009, Northing 3,485,333; Tax Parcel ID T013 001, (Attachment A; Attachment B: Figure B-1). The proposed federal undertaking requires compliance with Section 106 of the National Historic Preservation Act. This memorandum provides a National Register of Historic Places (NRHP) eligibility and effects assessment for the USDA-ARS Tifton Campus and an assessment of the potential for archaeological impacts in association with the proposed undertaking conducted by a Secretary of the Interior (SOI)-qualified architectural historian and archaeologist. Relevant maps and figures are included in Attachment B. Attachment C provides current photographs of the existing buildings comprising the campus. Attachment D contains additional contextual and setting photographs of the campus, and Attachment E includes interior photographs of Building 001 (B001) with a map key.

## INTRODUCTION

The 5.25-acre USDA-ARS Tifton Campus (Project Boundary) supports the Southeast Watershed Research Unit (SEWRU) and the Crop Genetics and Breeding Research Unit (CGBRU) research facilities. When SEWRU was established in 1966, its mission was to “identify and characterize the elements that control flow of water from watersheds in the southeastern U.S. to provide information for better management of water resources on those watersheds” (Thomas 1993). SEWRU's water resources research has expanded to include systems research on the feedbacks between agricultural practices, environmental conditions, pest management, and the role water plays in linking these components of agricultural systems. CGBRU conducts research to improve breeding methods and plant genetics for improved crop yields, enhanced environmental quality, and pest management strategies. Research is conducted on warm season grasses (forage and turf), corn, peanuts, and sorghum (Butler et al. 1993). The USDA-ARS Tifton Administrative Officer and staff serve both the SEWRU and CGBRU, as well as the National Peanut Research Laboratory in Dawson, Georgia (Denby 1993).

The CGBRU and administrative staff occupy administrative and laboratory buildings on the USDA-ARS Tifton Campus and on the adjacent University of Georgia (UGA) campus. The USDA-ARS lease with UGA for these buildings expires in 2023. The USDA-ARS is proposing a consolidation and modernization project for the Tifton Campus. The Project would provide more laboratory and administrative space on the USDA-ARS Tifton Campus and would reduce the amount of leased space from UGA. The proposed Project would include demolishing outdated structures, constructing new





Santiago Martinez  
Georgia Department of Community Affairs  
January 13, 2022  
Page 2

buildings, renovating the largest laboratory building on the Tifton Campus (B001), and upgrading utility and roadway infrastructure (Attachment B: Figure B-2).

Extant buildings and structures associated with the campus vary in size, materials, and age. There are six one-story, brick masonry buildings on the USDA-ARS Tifton Campus constructed in the 1960s. In addition to buildings, there are 17 additional structures and equipment on site including storage sheds, mobile storage units, outdoor cold storage units, and greenhouses, which serve as agriculture research space, office space, and storage. The support structures were constructed between the 1960s and 2000s in response to the changing needs of the researchers.

## **PROJECT DESCRIPTION**

The proposed Project involves the following improvement, removal, and/or construction of new facilities to support the ongoing SEWRU and CGBRU missions (Attachment B: Figure B-2):

- Renovation of Building 001 – The one story, brick-masonry building containing research laboratories and office space was constructed in 1962 and renovated in 1978 to replace the boiler. The building was renovated again in 1982 to replace the ceiling tiles, lighting, and the heating, ventilation, and air conditioning (HVAC) system. The proposed 2022 renovation would include replacing the ceiling tiles, installing new lights, and replacing the HVAC system and ductwork. The ceiling and lights would be similar in appearance to the existing. Additionally, four non-load-bearing walls would be demolished to expand laboratory and office space. No exterior changes are proposed. Additional information regarding the proposed interior improvements to B001 is included in Attachment E.
- Realignment of the north-south roadway transecting the USDA-ARS Tifton Campus – Demolishing existing non-historic-age equipment (B091 and B092) would allow for a new entrance and realigned roadway through the USDA-ARS Tifton Campus. The realignment would eliminate blind corners and driving safety concerns while providing space to construct new buildings (Attachment B: Figure B-2).
- Construction of a new three-story laboratory building with connector to B001 – The existing laboratory space in B001 is inadequate to support the 11 additional Scientist Years (SY) that would relocate to the USDA-ARS Tifton Campus. A SY defines the number of scientists working at a facility. One SY includes a scientist, his/her support personnel, and limit of 3,000 gross square feet (GSF) of space. The new multi-story, modern laboratory facility would be constructed in the footprint of existing non-historic-age equipment (B091 and B092). The three-story laboratory building would be of steel frame construction with brick veneer and metal paneling, and a standing seam mono-sloped roof and would include several wet laboratory rooms, office space, and additional storage. The preliminary design is based on the nearby UGA Administrative Building (UGA 4601) that is of similar vintage and aesthetic character to B001. Preliminary renderings of the proposed laboratory building are included in Attachment B: Figures B-4.1 and B-4.2.

Santiago Martinez  
Georgia Department of Community Affairs  
January 13, 2022  
Page 3

- Construction of a new two-story support building – Existing storage space on the USDA-ARS Tifton Campus is also limited, and a new, multi-story support building would be constructed to house laboratory supplies and equipment. The support building would be constructed in the footprint of B091 and B092 and would be of steel frame and concrete masonry unit construction with a standing seam metal roof. It would house an overhead crane to bring equipment to the second-floor storage areas and would also include small field science processing areas. Preliminary exterior elevation drawings of the proposed support building are included in Attachment B; Figure B-4.3.
- Construct new parking areas north and east of B001 and north of the new support building – Additional parking spaces would be required to support the proposed consolidation efforts. Additional new parking lots would be constructed in the maintained lawn/undeveloped spaces in the northern portion of the campus (Attachment B: Figure B-2).
- Two existing drying barns would be relocated, and several prefabricated drying barns would be acquired to consolidate all drying barns at the campus. Drying barns would be relocated to the southwest portion of the campus where B084 and B059 are currently located. B059 (Hazardous Material Waste Storage) would be relocated north of B002 where B089 and B093 are currently located. B089 and B093 are proposed for demolition (Attachment B: Figure B-2).

## **BACKGROUND REVIEW METHODS**

Cultural resources specialists conducted a background review to facilitate an NRHP eligibility assessment of the USDA-ARS Tifton Campus and an assessment of the potential for archaeological impacts in association with the proposed undertaking. The reviewed materials included archaeological site files and previous surveys from UGA's Georgia Archaeological Site File (GASF), historic resources (NRHP-listed and previously surveyed) included on Georgia's Natural, Archaeological, and Historic Resources GIS (GNAHRGIS), and sources detailing the history of the UGA Tifton campus and its agricultural research mission. These included relevant sections of the 2019 *University of Georgia Historic Preservation Master Plan* (Georgia Master Plan) (Wiss, Janney, Elstner Associates, Inc. et al. 2019), a survey report regarding Georgia's Agricultural Experiment Stations provided by the Georgia State Historic Preservation Office (SHPO) (Reed et al. 2015), *The UGA Coastal Plain Experiment Station...the First 75 Years* (Bass 1993), and oral history and background materials provided by USDA-ARS staff.

## **BACKGROUND REVIEW RESULTS**

Review of UGA's GASF data identified one archaeological site, 9TI63, within a one-mile Study Area (Attachment B: Figure B-3). The site is a historic artifact scatter associated with a former barn located on the UGA Coastal Plain Experiment Station and was recorded in 2012 by New South Associates during a Phase I Archaeological Survey of the UGA Tifton Building 4672. GASF did not provide the limits of this survey or an associated report. Site 9TI63 was recommended ineligible for NRHP inclusion on the site form provided by GASF. The site is not within the Project Boundary and would not be impacted by the proposed undertaking. Ten additional archaeological surveys have been previously conducted within the one-mile Study Area, but none intersect the Project Boundary (Table 1; Attachment B: Figure B-3). The remaining surveys were conducted primarily in support of Georgia Department of Transportation

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Page 4

(GDOT) projects and did not identify any additional archaeological sites within the one-mile Study Area. No archaeological sites or previously recorded cultural resources are reported within the Project Boundary.

**Table 1: Previous Archaeological Surveys within 1 mile**

GASF ID	Year	Consultant	Sponsor	Project
-	2012	New South Associates	-	Phase I Archaeological Survey of the UGA Tifton Building 4672
2553	2002	Southwind Archaeological Enterprises	GDOT	Carpenter Road Improvements
3092	2003	Southwind Archaeological Enterprises	GDOT	Carpenter Road Improvements Addendum
8124	2014	GDOT	GDOT	I-75 Interchange Reconstruction at CR410/Brighton Road
8146	2012	Edwards-Pitman Environmental, Inc.	GDOT	Carpenter Road Improvements Addendum
9648	2007	GDOT	GDOT	SR 7 Resurfacing
10157	2003	GDOT	GDOT	Grading US 41/SR 7 at the SR 401/I-75 Southbound Entrance Ramp
10180	2017	Southeastern Archaeological Services, Inc.	UGA	University of Georgia; Tifton Campus Outparcel #5
10240	1985	GDOT	GDOT	I-75 Widening
11819	1983	GDOT	GDOT	Eight Street Widening
13301	1977	GDOT	GDOT	Central Street Widening

Source: GASF 2021

There are a number of previously-recorded, historic-age, non-archaeological resources within the one-mile Study Area; however, no individual resources are located in immediate proximity to the Project Boundary (Attachment B: Figure B-3). Review of the Georgia Master Plan indicates the USDA-ARS Tifton Campus is within the boundaries of an NRHP-eligible historic district comprising the entire UGA Tifton Campus, also known as UGA's Coastal Plain Experiment Station. Though within the district's boundaries, the subject buildings were not specifically assessed for NRHP eligibility or as contributing resources to the UGA Tifton Campus historic district during development of the Georgia Master Plan due to their ownership by the federal government. The historic district was identified as significant at the state level in the areas of Agriculture, Architecture, Education, Invention, and Science. Specifically, "[p]hysical evidence of the facilities used to advance the science and practice of agriculture survives throughout the campus, while the campus as a whole conveys patterns of organization, a road network, field patterns, and land uses that reflect important heritage values" (Wiss, Janney, Elstner Associates, Inc. et al. 2019). The district was identified as eligible under Criteria A and C with a period of significance extending from the college's founding in 1919 through 1966, the 50-year cutoff from the date of the



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plan's publication (Wiss, Janney, Elstner Associates, Inc. et al. 2019). The boundaries of the proposed district in relation to the Project are depicted on Figure B-3 in Attachment B.

## **NRHP ELIGIBILITY AND EFFECTS ASSESMENT OF THE USDA-ARS TIFTON CAMPUS**

The following sections contain historical background and descriptive information relevant to the NRHP eligibility evaluation of the buildings comprising the USDA-ARS Tifton Campus and includes an assessment of the Project's potential to adversely effect historic (NRHP-listed or eligible) buildings under Section 106.

### **Architectural Documentation and Assessment Methods**

Field methods for the investigation followed the *Georgia Historic Resources Survey Manual* (2020) guidelines as well as approved methods outlined in a meeting with SHPO staff on November 2, 2021. During the field survey effort, surveyors sought to document all buildings, structures, objects, districts, etc. constructed in or prior to 1976 (45 years of age or older) within the Project Area. All resources within the Project Area were photo-documented and their locations recorded for further assessment by the Project's Secretary of the Interior (SOI)-qualified Architectural History Principal Investigator.

Preliminary NRHP eligibility assessments were based on the SOI standards for identification and evaluation of historic resources, including the 50-year-age criterion and assessment of integrity (design, materials, workmanship, feeling, location, setting, and association) and significance with regard to design or association with recognized historic contexts or significant individuals. In addition to the general 50-year-age criterion (45-year-age criterion for the current Project to account for potential delays in Project letting), NRHP eligibility requires a resource to meet at least one of four primary criteria for significance and to retain sufficient physical integrity (Advisory Council on Historic Preservation 35 CFR 800 2004). More specifically, the criteria state that historic-age resources may qualify for NRHP consideration if they meet one or more of the following Criteria for Evaluation:

- A. Association with events that have made a significant contribution to the broad patterns of our history;
- B. Association with the lives of significant persons of the past;
- C. Embodiment of the distinctive characteristics of 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; and/or
- D. May have yielded or may be likely to yield information important in history or prehistory.

These criteria, along with NRHP Criteria Considerations for religious properties (A), relocated resources (B), birthplaces or graves of historic figures (C), cemeteries (D), reconstructed buildings (E), commemorative properties (F), and properties that have achieved significance within the last 50 years (G), served as the basis for preliminary NRHP eligibility recommendations presented herein.

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### **Summary USDA-ARS Tifton Campus History**

The USDA-ARS Tifton Campus contains a group of buildings, structures, and equipment constructed between 1962 and the 2000s (see relevant photographs in Attachments C, D, and E). The core of the historic-age portion of the campus includes the main laboratory building (B001) and supporting facilities, such as greenhouses, warehouses, and chemical storage buildings (B002, B003, B004, B007, B008, B013, and B015), constructed between 1962 and the mid-1970s (Attachment B: Figure B-5.1; Attachment C). The historic-age resources are primarily associated with plant and insect research overseen by the SEWRU. Resources B089 and B093 represent portable prefabricated drying houses constructed in the mid- to late-1970s (Attachment B: Figure B-5.1; Attachment C: Photographs C-37 and C-41). The remaining buildings, structures, and equipment associated with the campus postdate the historic period and were constructed to replace outdated or obsolete building stock and to support the evolving needs of the research scientists as farm practices and technology changed during the late-twentieth century.

The remnant historic-age buildings are all of utilitarian and functional design and have undergone alterations over the years to keep them viable. Most have experienced replacement materials, including windows, cladding, and overhead doors. Others have experienced additions or other significant footprint alterations (i.e., B002; Attachment C: Photographs C-9 through C-14), detracting from their overall integrity of design, materials, and workmanship. Despite alterations and non-historic-age infill, the complex maintains associations with defined historic contexts relevant to the surrounding NRHP-eligible UGA Tifton Historic District. The core historic-age resources on the USDA-ARS Tifton campus were constructed during a corresponding building boom at UGA during the 1950s and 1960s that included both “large permanent buildings...as well as smaller ones such as corn cribs and other specialized crop-related storage and processing facilities and greenhouses” (Wiss, Janney, Elstner Associates, Inc. et al. 2019).

Development of the USDA-ARS Tifton Campus was related to federal policies, specifically, Senate Resolution 48, issued in April 1959. The resolution established the Select Committee on National Water Resources and authorized

exhaustive studies of the extent to which water resources activities in the United States are related to the national interest, and the extent and character of water resources activities, both governmental and non-governmental...to provide the quantity and quality of water for use by the population, agriculture, and industry between the present time and 1980...to the end that such studies and the recommendations based thereon may be available to the Senate in considering water resources policies for the future” (Schad 1962).

The government recognized the lack of federal oversight and attention to water resources and the need to identify important water development projects that would meet growing demand. The committee sought to determine how much water development was needed, when and where it was required, and what level of costs would be justified to meet national needs. The information was intended to guide future water policy. It involved a great statistical effort on the part of various federal agencies to determine current consumption, future needs, and priorities. The USDA-ARS was involved directly in this effort, and it was during this period that the SEWRU relocated to the USDA-ARS Tifton Campus to participate in regional research efforts authorized under this resolution (Schad 1962; Strickland 2021).

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In addition to associations with federal initiatives, the USDA-ARS Tifton Campus has always been intertwined with the research missions of the UGA Tifton Campus. This cooperation was not mandated, but voluntary because both entities want to make the best use of available research funding and cooperate on projects that would be beneficial to the region. For this reason, USDA-ARS and UGA have continued to work together with USDA-ARS supporting post-graduate research and partnering with UGA researchers on various projects (Strickland 2021).

The historic-age resources at the USDA-ARS Tifton Campus thus fit under the contexts “Growth of the Coastal Plain Experiment Station Following World War II (1946-1970)” and “Establishment of the Contemporary Coastal Plain Experiment Station (1971-2016)” as outlined in the Georgia Master Plan. At the UGA Tifton Campus, turf research became “Tifton’s leading research and development product” during the period beginning in 1946 and continues to be a main research focus of the USDA-ARS Tifton Campus (Wiss, Janney, Elstner Associates, Inc. et al. 2019). Though the administrative units assigned to the facility and the specific research missions have changed over time, researchers at USDA-ARS have always been involved in turf research and in the development of new crop varieties better adapted to higher production and disease resistance (Strickland 2021). Figures B-7.1 through B-7.3 in Attachment B show the development of the USDA-ARS Tifton Campus overtime in relation to the adjacent UGA Tifton Campus.

The main laboratory (B001), service shop (B002), and headhouse/greenhouse facility (B003) were all constructed in 1962 (Attachment C: Photographs C-1 through C-17), during the same period significant permanent buildings were constructed on the UGA Tifton Campus, including a large Administration Building (UGA 4601), built in 1954, and the Horticulture Building (UGA 4604), built in 1963 (Wiss, Janney, Elstner Associates, Inc. et al. 2019) and located outside of the Project Boundary.

Funding to construct B001 was appropriated by the House Sub-committee on Agricultural Appropriations in 1959, and the building was dedicated in 1961 as the “Southern Grain Insects Research Laboratory” (Wiseman and Rogers 1993). The primary objectives of the lab were to develop new approaches for insect control, search for insect-resistant germplasm to use in crop improvement programs and to improve existing insect control measures. By 1964, additional units, such as the Small Grain Insects Research unit and the Pesticide Chemicals and Forage Insecticide Residue Investigations unit, were added to the campus, and in 1983, the building’s name changed to the “Insect Biology and Population Management Research Laboratory” (Wiseman and Rogers 1993). During this period, new research units included the Insect Migration Research Unit, the Plant Resistance/Germplasm Enhancement Research Unit, and the Insect Biology/Management Systems Research Unit. By the 1990s, major research avenues included Environmentally Compatible Pest Control Strategies with a stated goal of managing “pests by developing safe and environmentally sound alternatives to reduce reliance on classical chemical pesticides and, at the same time, ensure a safe high-quality stable supply of food and fiber” (Wiseman and Rogers 1993).

The UGA buildings constructed during the same period are similar in scale and character to the main laboratory building on the USDA-ARS Tifton Campus (B001), including masonry construction, the hipped roof line shared with the Administration Building (UGA 4601), and the ribbon windows common to the Horticulture Building (UGS 4604). The masonry cladding, hipped roof, and massed plan, linear form is also characteristic of B002 and B003 on the USDA-ARS Tifton Campus. Further, the USDA-



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ARS complex shares the “park-like” character that defines the rest of the UGA Tifton Campus in the associated Georgia Master Plan from publicly accessible vantage points (see contextual and setting photographs in Attachment D). Despite these similarities to the neighboring UGA Tifton Campus, the USDA-ARS Tifton Campus fronts Davis Road and a non-historic-age portion of the Abraham Baldwin Agricultural College campus (Appendix B: Figure B-5.1).

### **NRHP Assessment of the USDA-ARS Tifton Campus**

Though none of the buildings appear to qualify for individual NRHP listing, their associations with defined historic contexts and agricultural research endeavors and their overall aesthetic similarity to contributing features of the adjacent NRHP-eligible UGA Tifton Historic District, the permanent and recognizable historic-age components of the USDA Tifton Campus (B001, B002, B003, B004, B007, B008, B013, and B015) are recommended for NRHP inclusion as contributing resources to the district. The resources are significant under Criterion A in the areas of agriculture and education and under Criterion C as examples of purpose-driven, research-related architecture, more significant for their form, function, and place within the larger campus landscape than for their individual design or stylistic qualities.

Two additional historic-age resources, B089 and B093, are temporary prefabricated metal storage containers constructed between the 1970s and 1980s. They are not permanent or fixed parts of the landscape and were intended to be disposed of or relocated once their useful life expired. As a result, they are not recommended as contributing features of the recommended NRHP-eligible campus.

Table 2 provides additional information about the buildings on the USDA-ARS Tifton Campus, including NRHP-eligibility recommendations and assessment of potential Project effects. The buildings are depicted on Figure B-5.1 in Attachment B, photographs of the historic-age resources are included in Attachment C, additional contextual and setting photographs are in Attachment D, and interior views keyed to a floorplan of B001 are included in Attachment E.

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**Table 2: Buildings on USDA-ARS Tifton Campus**

Building	Building Purpose	Year Constructed	Proposed Action	Description of Proposed Action	NRHP Eligibility Recommendation	Effect Assessment
B001	Laboratories	1962	Renovate	Replace outdated infrastructure, including full HVAC replacement, ceiling and lighting replacement, main switchgear replacement, and minor interior renovations and demolition of non-load bearing walls.	Contributing (NRHP Criteria A and C)	No Adverse Effect
B002	Service Shop	1962	No Action	N/A	Contributing (NRHP Criteria A and C)	No Adverse Effect
B003	Headhouse and Greenhouses	1962	No Action	N/A	Contributing (NRHP Criteria A and C)	No Adverse Effect
B004	CPMRU Insect Rearing Annex	1965	No Action	N/A	Contributing (NRHP Criteria A and C)	No Adverse Effect
B006 (two buildings)	Warehouses	2002	No Action	N/A	Not Eligible/Non-Contributing	N/A
B007	Chemical Storage	1965	No Action	N/A	Contributing (NRHP Criteria A and C)	No Adverse Effect
B008	Laboratory/Insectary Field Lab	1965	No Action	N/A	Contributing (NRHP Criteria A and C)	No Adverse Effect
B013	Equipment Storage	1972	No Action	N/A	Contributing (NRHP Criteria A and C)	No Adverse Effect
B015	Insect Laboratory	1974	No Action	N/A	Contributing (NRHP Criteria A and C)	No Adverse Effect

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Building	Building Purpose	Year Constructed	Proposed Action	Description of Proposed Action	NRHP Eligibility Recommendation	Effect Assessment
B057	Auxiliary Building	Post-1993	No Action	N/A	Not Eligible/Non-Contributing	NA
B059	Hazardous Material Waste Storage	1980s	Demolish and reconstruct at new location	Location of new drying barns	Not Eligible/Non-Contributing	N/A
B066	Shed	1980s	No Action	N/A	Not Eligible/Non-Contributing	N/A
B084	Chemical Storage	1980s	Demolish and Reconstruct	Location of new drying barns. A new chemical storage building would be constructed adjacent to B002	Not Eligible/Non-Contributing	N/A
B089	Drying Barns	Post 1972	Demolish and Reconstruct	Location of new hazardous material waste storage building. New drying barns will be constructed where B084 and B059 are currently located.	Not Eligible/Non-Contributing	N/A
B091	Shed next to greenhouse	2000	Demolish and Reconstruct	Location of new Support Building, new Laboratory Building, and new roadway alignment	Not Eligible/Non-Contributing	N/A
B092	Hoop Houses	Post 1993	Demolish and Reconstruct	Location of new Support Building, new Laboratory Building, and new roadway alignment	Not Eligible/Non-Contributing	N/A



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Building	Building Purpose	Year Constructed	Proposed Action	Description of Proposed Action	NRHP Eligibility Recommendation	Effect Assessment
B093	Drying Barns	Post 1972	Demolish and Reconstruct	Location of new hazardous material waste storage building. New drying barns will be constructed where B084 and B059 are currently located.	Not Eligible/Non-Contributing	N/A
B094	Oil Storage	2000	No Action	N/A	Not Eligible/Non-Contributing	N/A

### Section 106 Effects Discussion

Physical effects are proposed to three historic-age components of the campus, including one recommended contributing resource (B001) and two that are recommended as non-contributing (B089 and B093). All improvements to B001 would be interior, with the exception of the replacement of a 1980s vintage HVAC system. The building comprises the main laboratory building at the USDA-ARS Tifton Campus and requires regular upgrades as research needs and technology changes. Proposed improvement include:

- Replacement of ceiling tiles and lights with new units similar in appearance
- Installation of a new HVAC system and replacement of the associated ductwork
- Demolition of four non-loadbearing walls to expand and increase efficiencies in office/laboratory areas

The building has already experienced a number of exterior alterations, such as replacement of the character-defining ribbon windows with vinyl units and addition of standing seam metal roof cladding, that detract from its integrity of materials, workmanship, and feeling (Attachment C: Photographs C-1 to C-8). Further, the interior of the facility has been modified over the years to facilitate changes in the research mission and staffing needs. None of the changes have rendered the building unable to contribute to the NRHP-eligible UGA Tifton Historic District. As a result, the current proposed renovations are anticipated to have no adverse effect to the resource or to the district under Section 106. Attachment E includes representative photographs of the ceiling tiles and light fixtures proposed for replacement, as well as of the walls proposed for demolition keyed to a floorplan of the building.

Two portable metal storage sheds of circa 1970s vintage (Resources B089 and B093) are proposed for demolition to accommodate relocation and consolidation of drying barns and other storage structures to the south end of the campus (Attachment C: Photographs C-37 and C-41). As the resources are not recommended as contributing features of the NRHP-eligible USDA Tifton Campus, their loss would not

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diminish the integrity of adjacent contributing buildings. Therefore, their removal is anticipated to have no adverse effect. The other buildings proposed for demolition (B091 and B092) are not historic-age.

Other elements of the Project requiring consideration under Section 106 include:

- Realignment of the north-south roadway transecting the USDA-ARS Tifton Campus and construction of a new entrance
- Construction of new three-story laboratory building with connector to B001 and an associated two-story support building
- Construction of new parking areas east of B001 and north of the proposed support building

Realignment of the north-south road would require demolition of two non-historic-age structures; however, it would not dramatically change the existing circulation pattern of the campus, nor would the new roadway differ significantly in size, scale, or materials from the extant entry drive. As a result, this action is not anticipated to have an adverse effect on the USDA-ARS Tifton Campus or on any of the recommended contributing resources.

Similarly, construction of the new laboratory and support buildings would not diminish any of the characteristics that qualify the contributing resources on the USDA-ARS Tifton Campus for NRHP inclusion. The buildings would be similar in massing, size, and scale to the current building stock and include architectural features compatible with the recommended contributing resources on the campus. The current proposed design of the laboratory building is generally based off the appearance of the nearby UGA Administration Building (UGA 4601), built in 1954. It will feature masonry cladding, multilight metal sash windows, and a massed, linear plan in line with the institutional character of extant B001 (Attachment B: Figures B-4.1 and B-4.2). The support building would be of utilitarian design, similar to other warehouse and storage facilities already on site. Neither resource would alter the educational and institutional character of the complex, obscure, damage, or destroy character-defining features of contributing buildings on the campus, or dramatically affect existing spatial relationships among the extant buildings and structures. Further, they are located at the northern part of the campus, which fronts Davis Road and the non-historic-age Abraham Baldwin Agricultural College campus. As a result, construction of the proposed new buildings would not adversely affect the recommended contributing resources under Section 106.

Finally, expansion and construction of new parking areas would not introduce any visual changes or require significant modifications to the existing landscape. As a result, no adverse effects to historic (NRHP-eligible) buildings are anticipated as a result of this activity. The potential for impacts to archaeological resources from the proposed Project is discussed in the following section.

## **ARCHAEOLOGICAL POTENTIAL**

In addition to the review of archaeological site files and previous surveys from UGA's GASF discussed above, Burns & McDonnell's SOI-qualified archaeologist Shelly Wunderlich reviewed the Soil Web supplied by the Natural Resources Conservation Service and historic-age maps and aerials provided by the U.S. Geological Survey (USGS) Historic Topographic Map Explorer and the University of Georgia

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online Galileo Library. These sources were examined to assess the potential for previously unrecorded cultural resources within areas potentially subject to ground disturbing activities.

Soils within the Project Boundary are mapped as Tifton-Urban land complex (NRCS 2021). Tifton series soils formed in loamy marine sediments on the coastal plain. A typical profile consists of 30 centimeters (cm) of dark grayish brown loamy sand overlying strong brown sandy clay (NCSS 2017). Archaeological deposits, if present, are unlikely to be deeply buried. The Project is located on a ridge approximately 300 meters (m) and 600 m from two ephemeral tributaries of the Little River. This landform has moderate potential for prehistoric archaeological sites. However, given that the Project Boundary is previously developed and largely paved, it is unlikely to yield significant or intact archaeological features or artifacts.

A review of a recent topographic survey of the campus, as well as the photographs taken during documentation of the buildings, demonstrate the wooded portion of the Project Boundary where new parking areas are proposed contains a sidewalk, a buried communications line, and an overhead electric line (Attachment B: Figure B-5.2; Attachment D: Photograph D-8 and D-10). Few historic age-maps of an appropriate scale to show historic development of the Project Boundary were available. A 1910 soils survey map does not depict any buildings within the Project Boundary (Attachment B: Figure B-6) (Britton 1910). Aerial photographs from 1937 and 1948 also show that the wooded portion of the Project Boundary where new parking areas are proposed was once cleared, and the entire Project Boundary appears to be under cultivation (Attachment B: Figure B-7.1). Overall, the Project Boundary has low potential for historic-age archaeological resources pre-dating the construction of the USDA-ARS Tifton Campus. Because of the documented previous disturbances, an archaeological survey is not recommended.

## **SUMMARY RECOMMENDATIONS**

By submittal of this supplemental information, Burns & McDonnell, on behalf of USDA-ARS, requests your concurrence with the NRHP eligibility and effects recommendations presented herein. Further, USDA-ARS feels that archaeological investigations in support of the Project are not warranted. Please reach out to me directly with any additional questions or information needs at [bmharris@burnsmcd.com](mailto:bmharris@burnsmcd.com) or 512-558-2884.

Sincerely,

A handwritten signature in black ink, appearing to read 'Brandy Harris', with a stylized, flowing script.

Brandy Harris  
Sr. Cultural Resources Specialist

Attachments:

Attachment A - SHPO Correspondence





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Attachment B - Figures  
Attachment C - Resource Photographs  
Attachment D - Contextual Photographs  
Attachment E - Building 001 Additional Documentation

cc: Nick Girken, USDA-ARS  
Shauna Stotler, USACE  
Sara Kent, Burns & McDonnell  
William King, Burns & McDonnell

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**ATTACHMENT A - SHPO CORRESPONDENCE**



August 31, 2021

Dr. David Crass  
Historic Preservation Division Director  
Georgia State Historic Preservation Office  
60 Executive Park NE  
Atlanta, GA 30329

Re: U.S. Department of Agriculture  
U.S. Department of Agriculture-Agricultural Research Service Laboratory Modernization  
Project, Tifton, GA.

Dear Dr. Crass:

U.S. Department of Agriculture's Agriculture Research Service (USDA-ARS) is conducting scoping as part of the preparation of an Environmental Assessment (EA) in accordance with the National Environmental Policy Act (NEPA), for the USDA-ARS Laboratory Modernization Project (Project) at USDA-ARS's Tifton Laboratory Campus in Tifton, Georgia. The U.S. Army Corps of Engineers (USACE) Savannah District is supporting USDA-ARS by providing technical services for the Project.

USDA-ARS is proposing the modernization of the ARS Tifton Laboratory Campus in Tifton, GA. The Project would include the relocation and/or consolidation of the Southwest Watershed Research Unit and the Crop Genetics and Breeding Research Unit from the University of Georgia campus to the USDA-ARS Tifton Campus. The Project includes demolition of existing structures, remodeling of existing structures, construction of two new laboratory and office buildings, construction and expansion of new and existing parking lots, and utility infrastructure upgrades.

USDA-ARS is requesting information from your agency regarding the resources that should be included and discussed in the EA. A General Vicinity Map and a Project Site Plan Map are enclosed for your reference. Your input or information regarding any of the following resources is appreciated:

- Land use
- Aesthetics
- Water quality, streams/wetlands, groundwater, surface water, and stormwater
- Topography, soils and geology
- Prime Farmland
- Wildlife, vegetation and fisheries, including threatened and endangered species
- Socioeconomics (population, employment, growth, development)
- Hazardous and toxic materials and wastes
- Cultural resources (historic and archaeological sites, cemeteries)

Office of the Administrator  
Jamie L. Whitten Federal Building, Room 302-A  
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Washington, D.C. 20250  
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- Transportation and roads (airport and roadway expansions, construction, operations and maintenance)
- Utilities
- Noise
- Air Quality
- Safety

USACE has contracted with Burns and McDonnell for the preparation of the EA, please contact Sara Kent, the Burns and McDonnell project manager, at (470) 508-9904 or at [sskent@burnsmcd.com](mailto:sskent@burnsmcd.com) if you need additional information.

We would appreciate your written response within thirty (30) days of your receipt of this request. Responses may be mailed to 4004 Summit Boulevard NE, Suite 1200, Atlanta, GA 30319 or emailed to [sskent@burnsmcd.com](mailto:sskent@burnsmcd.com).

Sincerely,

Nicholas Girken  
USDA, Project Manager

cc: Shauna Stotler/USACE

Appendix A: Project Maps



**From:** [Harris, Brandy M](#)  
**To:** [Harris, Brandy M](#)  
**Subject:** RE: USDA-ARS Laboratory Modernization Project, Davis Road, Tifton HP-210910-003 Response  
**Date:** Friday, January 7, 2022 8:26:04 AM

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**From:** Santiago D. Martinez <[Santiago.Martinez@dca.ga.gov](mailto:Santiago.Martinez@dca.ga.gov)>  
**Sent:** Friday, October 22, 2021 2:15 PM  
**To:** Kent, Sara S <[sskent@burnsmcd.com](mailto:sskent@burnsmcd.com)>  
**Cc:** Girken, Nicholas - REE-ARS-CEC, Beltsville, MD <[nicholas.girken@usda.gov](mailto:nicholas.girken@usda.gov)>; Stotler, Shauna L CIV (USA) <[Shauna.Stotler@usace.army.mil](mailto:Shauna.Stotler@usace.army.mil)>; King, William R <[wrking@burnsmcd.com](mailto:wrking@burnsmcd.com)>; Henson, Kent <[khenson@burnsmcd.com](mailto:khenson@burnsmcd.com)>  
**Subject:** Re: USDA-ARS Laboratory Modernization Project, Davis Road, Tifton HP-210910-003 Response

Sara and others,

Good afternoon, thank you for getting this to me. Unfortunately, it appears there was a mistake on my end: instead of sending out our response letter, I accidentally sent out my review notes! The file names are very similar, so apparently, I got them mixed up - my apologies!

In any case, I have attached our response letter to this email. Fortunately, it looks like you were able to make pretty good sense of what I had sent and get us most of what we need to complete the review. I hate to ask given the circumstances, but if you could please gather the remaining items (see discussion below), it would be greatly appreciated.

For Item 1, this would just be an eligibility assessment of the lab campus as a whole, including which buildings are contributing or non-contributing. As I'm sure you noticed in my notes, information was a little hard to come by. It would seem that this campus likely has eligibility potential under Criterion A, and possibly C.

Item 2 appears to be covered in this email.

Item 3 is mostly covered, although a photo key would be very helpful. Additionally, even though no exterior alterations are proposed, it would be beneficial to have some exterior photos of the building, although these could be incorporated into Item 1.

Since the scope of work has changed to interior renovations of Building 1 only, it appears there will no longer be any ground disturbance, and thus, no potential to impact any archaeological resources. If you could just confirm that this understanding is correct, then Item 4 should be covered.

Again, my apologies for the mix up and for having to ask for the remaining items! Please let

me know if you have any questions for HPD and have a good weekend!

Best regards,

Santiago Martinez

Environmental Review Historian

Environmental Review & Preservation Planning

**Historic Preservation Division/Georgia DCA**

(404) 486-6425 | 60 Executive Park South, NE Atlanta, GA 30329

**Santiago D. Martinez**

Environmental Review Historian

Georgia Department of Community Affairs

Direct [4044866425](tel:4044866425)

[Santiago.Martinez@dca.ga.gov](mailto:Santiago.Martinez@dca.ga.gov)



---

**From:** Kent, Sara S <[sskent@burnsmcd.com](mailto:sskent@burnsmcd.com)>

**Sent:** Friday, October 22, 2021 12:48 PM

**To:** Santiago D. Martinez <[Santiago.Martinez@dca.ga.gov](mailto:Santiago.Martinez@dca.ga.gov)>

**Cc:** Girken, Nicholas - REE-ARS-CEC, Beltsville, MD <[Nicholas.Girken@usda.gov](mailto:Nicholas.Girken@usda.gov)>; Stotler, Shauna L CIV (USA) <[Shauna.Stotler@usace.army.mil](mailto:Shauna.Stotler@usace.army.mil)>; King, William R <[wrking@burnsmcd.com](mailto:wrking@burnsmcd.com)>; Henson, Kent <[khenson@burnsmcd.com](mailto:khenson@burnsmcd.com)>

**Subject:** RE: USDA-ARS Laboratory Modernization Project, Davis Road, Tifton HP-210910-003 Response

Hello Mr. Martinez,

I am following up to provide information on the USDA-ARS Laboratory Modernization Project, Davis Road, Tifton HP-210910-003 project. Due to funding and budget constraints, the USDA-ARS has narrowed the scope of work to include renovations to Building 1 as detailed below and attached. No additional renovations or demolitions are proposed for the Buildings noted in red as likely historic in the attached PDF response.

#### **Building 1**

- Constructed in 1962
- Renovated in 1978 to replace the boiler
- Renovated again in 1989, including new lights/ceiling, HVAC, and plumbing
- The proposed 2022 renovation will include replacing the ceiling tiles, installing new lights, and replacing the HVAC system and duct work. The ceiling and lights will be similar in appearance to the existing. Additionally, 4 non-load bearing walls will be demolished. No exterior changes are proposed.

Interior photos of Building 1, including the existing ceiling tiles, lighting, and the 4 walls proposed for demolition are attached for your review.

- The proposed new lighting information is also attached
- Lastly, I've attached a floorplan showing the location of the 4 walls proposed for demolition (highlighted in yellow)

Please let us know if you have any additional questions or need any additional information about the project. We appreciate your response. Thanks!

**Sara Kent \ Burns & McDonnell**

Project Manager, Environmental Services

o 470-508-9904 \ M 770-363-1453

[sskent@burnsmcd.com](mailto:sskent@burnsmcd.com) \ [burnsmcd.com](http://burnsmcd.com)

4004 Summit Boulevard \ Suite 1200 \ Atlanta, GA 30319

**\*\*\*Please note my new office address**

---

**From:** ER <[er@dca.ga.gov](mailto:er@dca.ga.gov)>

**Sent:** Wednesday, October 6, 2021 12:05 PM

**To:** [nicholas.girken@usda.gov](mailto:nicholas.girken@usda.gov)

**Cc:** Kent, Sara S <[sskent@burnsmcd.com](mailto:sskent@burnsmcd.com)>

**Subject:** USDA-ARS Laboratory Modernization Project, Davis Road, Tifton HP-210910-003 Response

From: Historic Preservation Division

Attached is our letter on the subject undertaking (in Adobe Acrobat PDF format)

**Do not respond to this e-mail.**

If you have any questions concerning our letter, please contact:

Santi Martinez at [santiago.martinez@dca.ga.gov](mailto:santiago.martinez@dca.ga.gov).

A free copy of Adobe Acrobat Reader can be downloaded from: [www.adobe.com](http://www.adobe.com)



Learn more about our commitment to [fair housing](#).



**ER**

**Georgia Department of Community Affairs**

[er@dca.ga.gov](mailto:er@dca.ga.gov)



October 6, 2021

Nicholas Girken  
Project Manager  
U.S. Department of Agriculture – Office of the Administrator  
Jamie L. Whitten Federal Building, Room 302-A  
1400 Independence Avenue SW  
Washington, D.C. 20250

**RE: USDA-ARS Laboratory Modernization Project, Davis Road, Tifton  
Tift County, Georgia  
HP-210910-003**

Dear Mr. Girken:

The Historic Preservation Division (HPD) has received initial information concerning the above referenced project requesting comments pursuant to the National Environmental Policy Act of 1969 (NEPA). Our comments are offered to assist the U.S. Department of Agriculture (USDA), Agriculture Research Service (ARS) in complying with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA).

Thank you for notifying us of this federal undertaking. We look forward to receiving Section 106 compliance documentation, as appropriate. Section 106 documentation should include:

1. An eligibility assessment of the USDA-ARS Tifton Laboratory Campus, including discussion of its relationship and possible integration into the previously determined National Register of Historic Places (NRHP)-eligible University of Georgia Tifton campus.
2. Project plans that include elevation drawings, site and landscape plans, and a description of proposed exterior materials for the new construction. Project plans that include detailed descriptions of proposed work, existing and proposed floorplans (if applicable), and description of proposed interior and exterior materials as applicable, for the rehabilitation portions of the project.
3. Current photographs, keyed to a map, of the existing buildings within the USDA-ARS Tifton Laboratory Campus, particularly those subject to project activities. For the remodeling activities, please include interior photographs, keyed to a floorplan, of areas where work will be occurring.
4. Potential for archaeological impacts, including previous surveys/results, potential for buried cultural resources in the project area, and proposed ground disturbance information.

If the federal agency intends to utilize NEPA to comply with Section 106, in lieu of the procedures set forth in 36 CFR Part 800, the USDA-ARS should notify HPD and the Advisory Council on Historic Preservation of its intent.

Please refer to project number **HP-210910-003** in future correspondence regarding this project. If we may be of further assistance, please contact Santiago Martinez, Environmental Review Historian, at (404) 486-6425 or [Santiago.Martinez@dca.ga.gov](mailto:Santiago.Martinez@dca.ga.gov).

Sincerely,



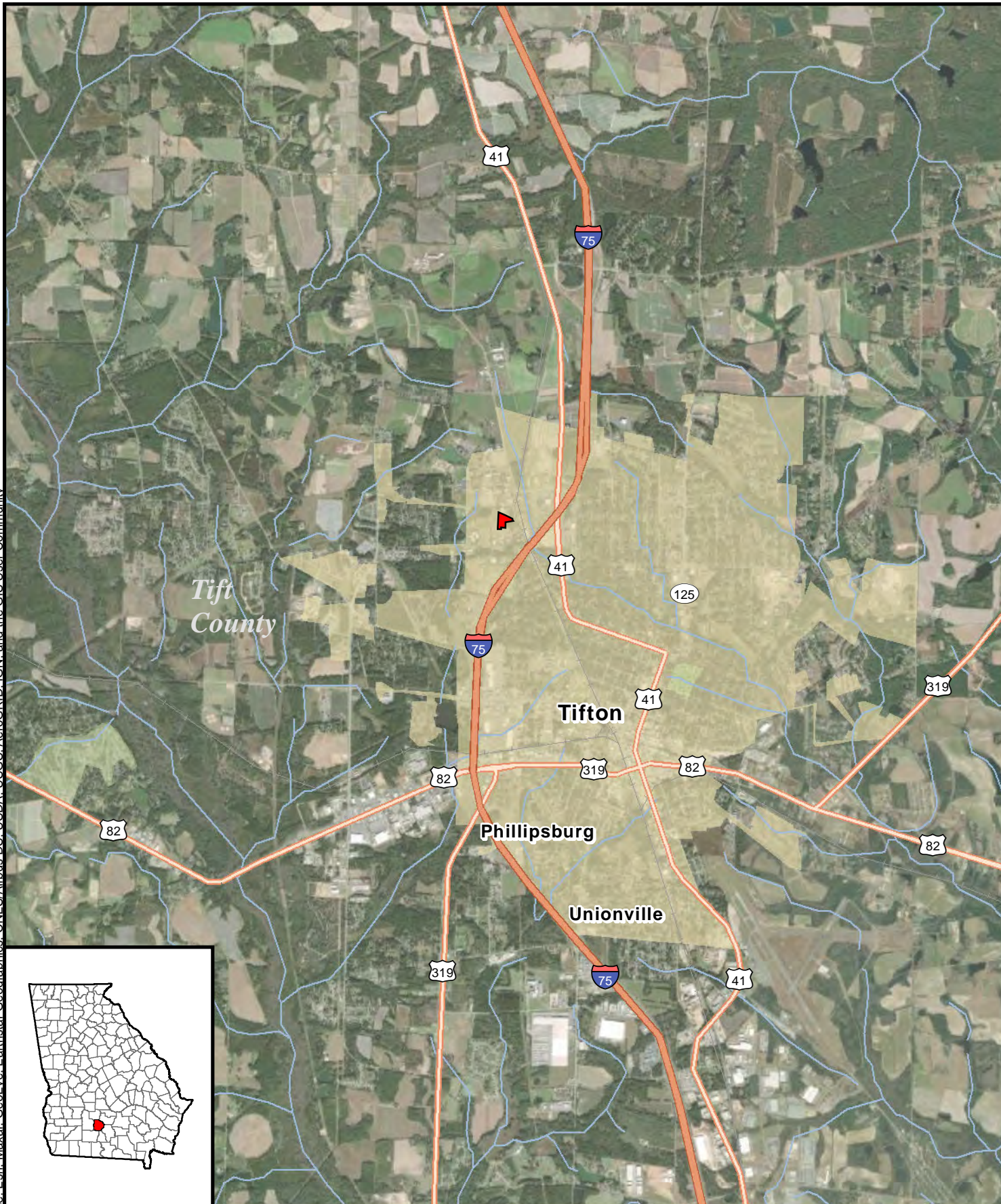
Jennifer Dixon, MHP, LEED Green Associate  
Program Manager  
Environmental Review & Preservation Planning

JAD/sdm  
cc: Sara Kent, Burns & McDonnell



## **APPENDIX B -PROJECT MAPS**



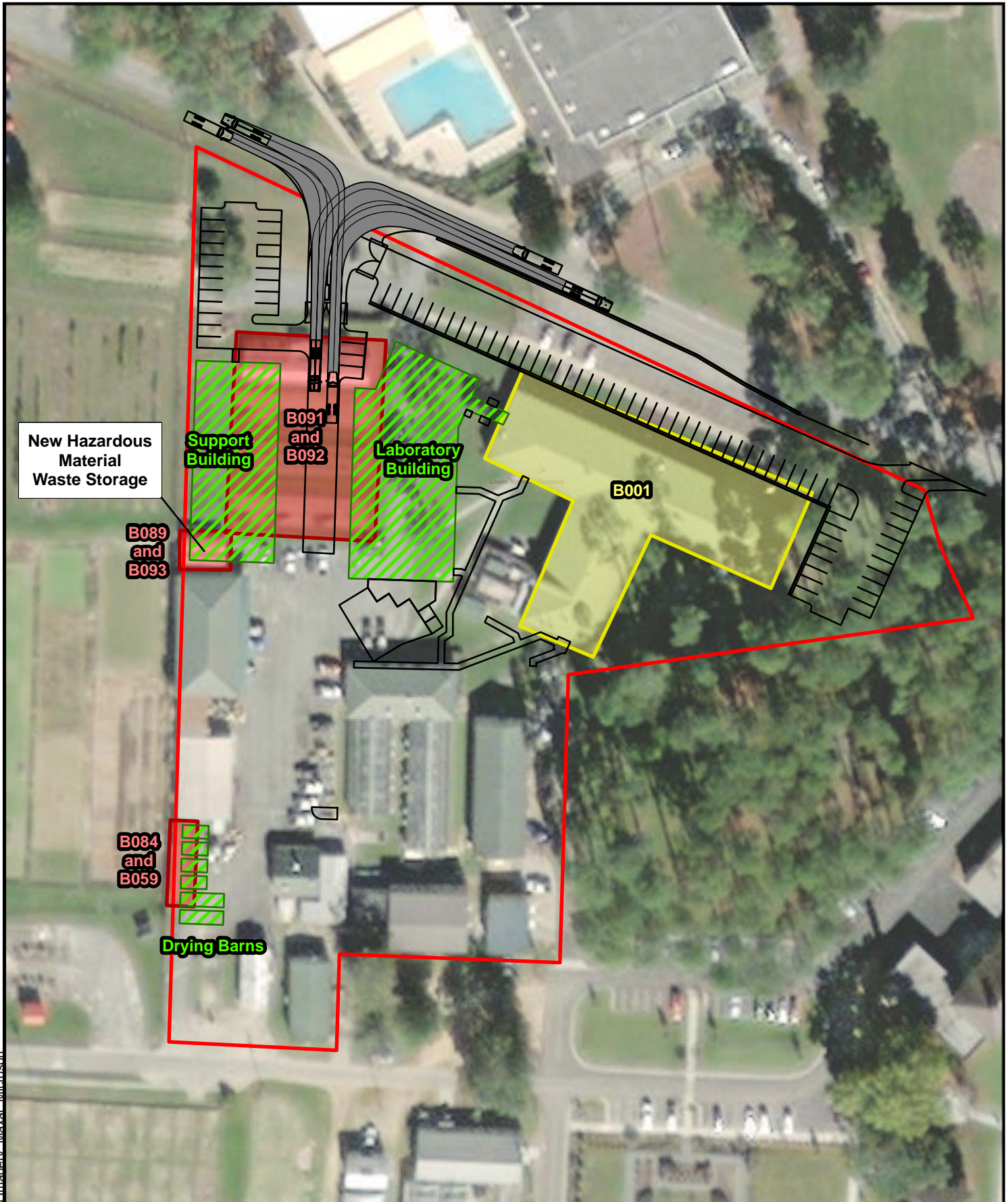


Project Boundary



Figure B-1  
Project Location  
USDA-ARS  
Laboratory Modernization  
Tift County, Georgia





New Hazardous  
Material  
Waste Storage

Support  
Building

B091  
and  
B092

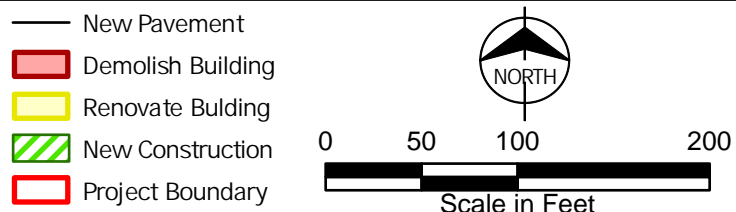
Laboratory  
Building

B001

B089  
and  
B093

B084  
and  
B059

Drying  
Barns



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MCDONNELL**

**Figure B-2**  
Proposed Undertaking  
USDA-ARS  
Laboratory Modernization  
Tift County, Georgia



- 



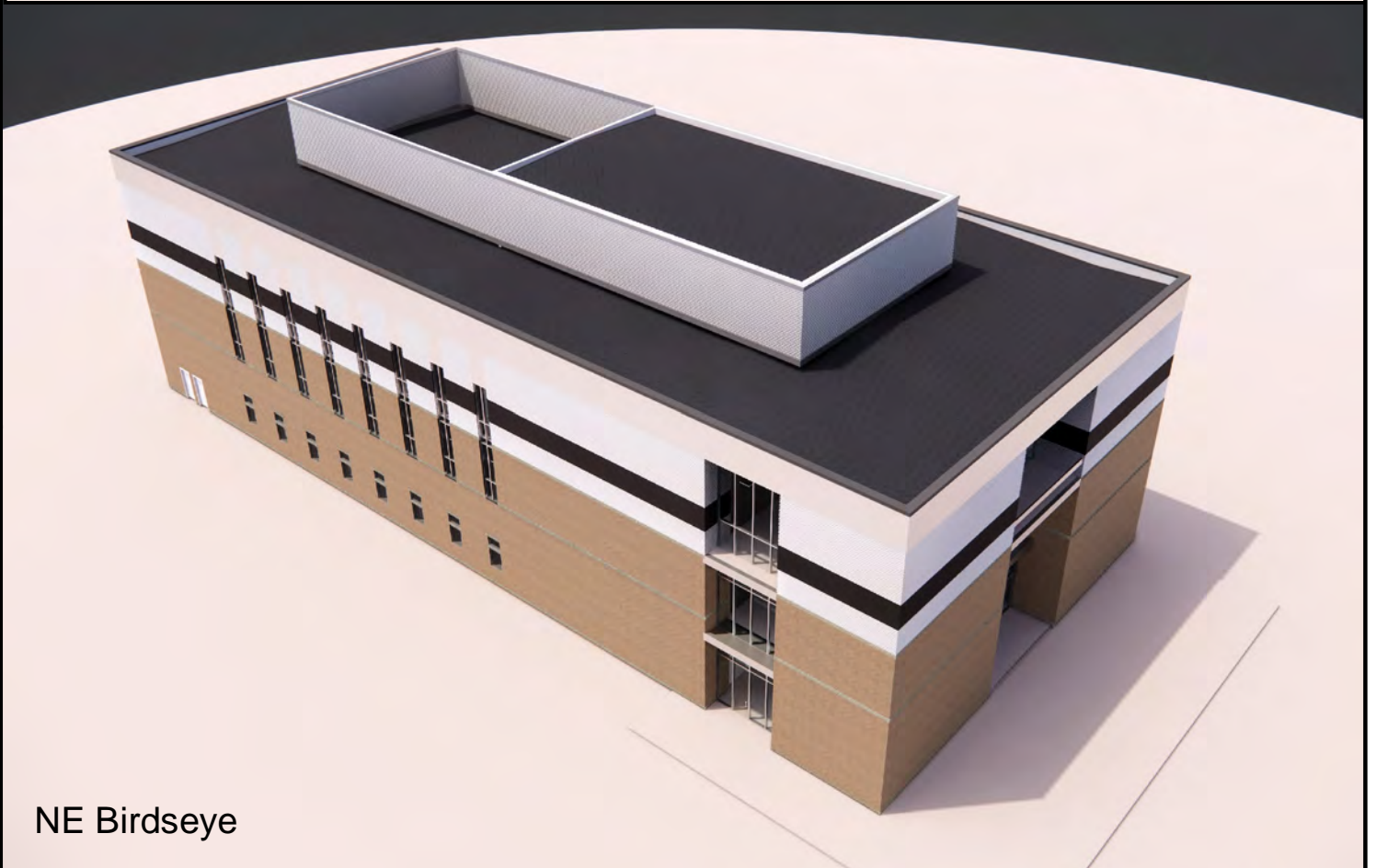
Figure B-3  
Background Review  
USDA-ARS  
Laboratory Modernization  
Tift County, Georgia



NW Approach



NE Birdseye

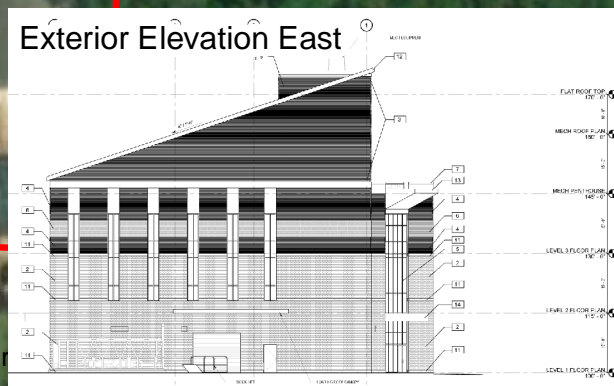
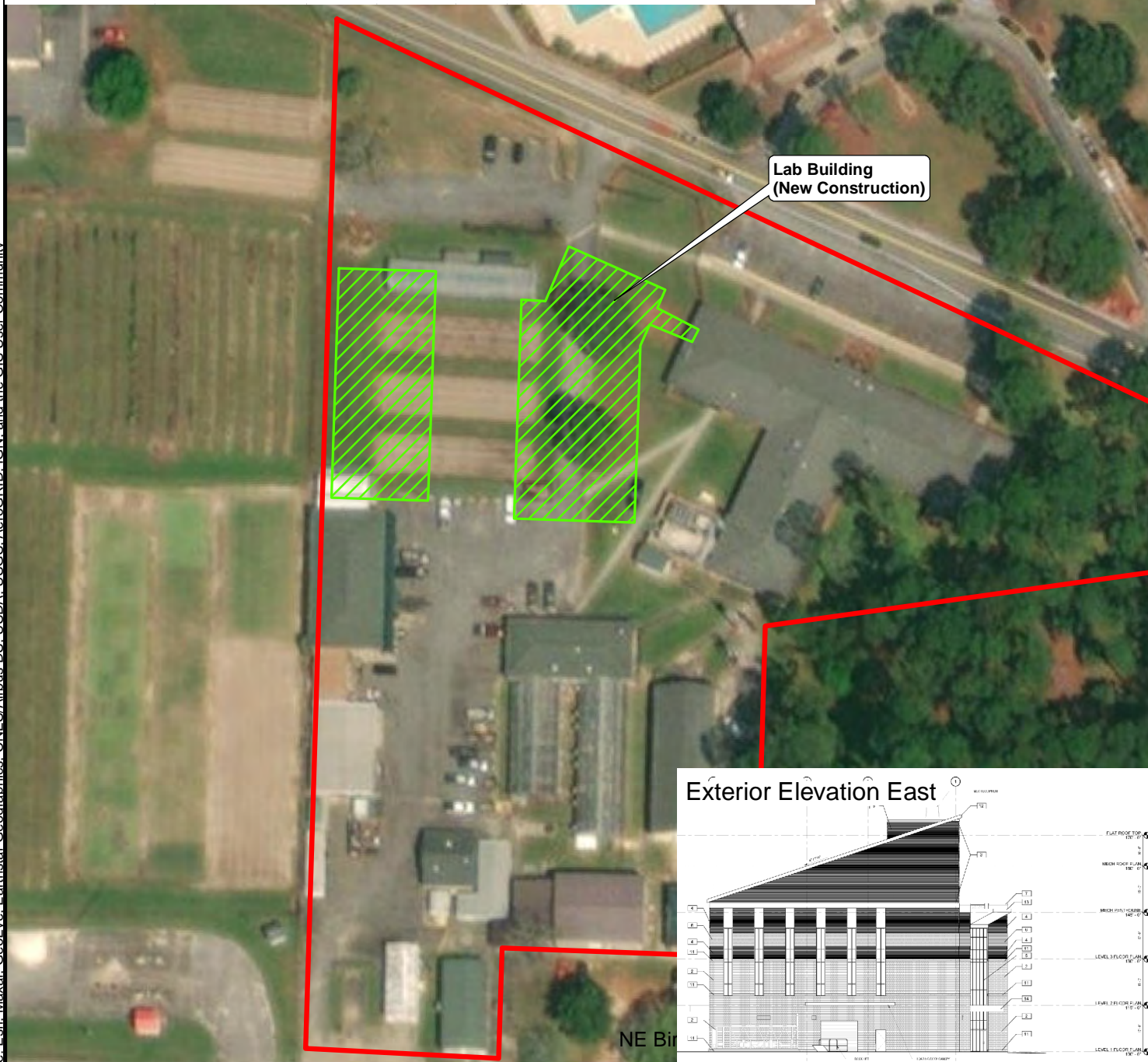
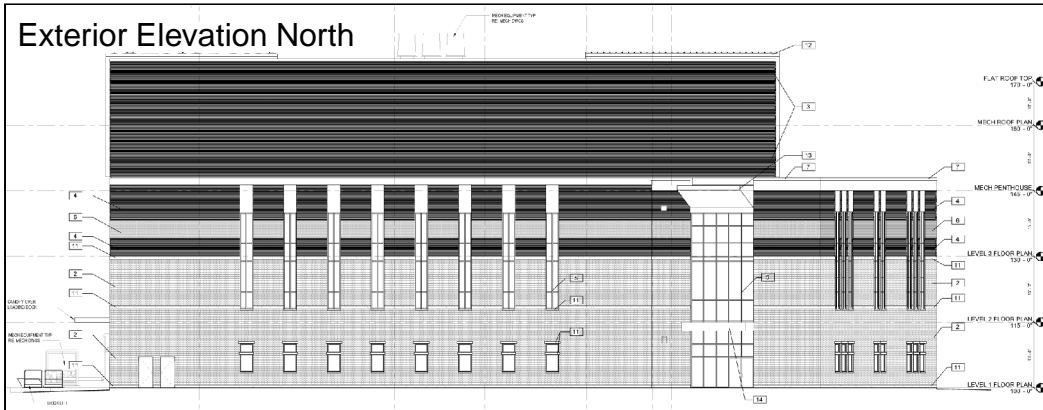


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Feet

**BURNS  
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Figure B-4.1  
Lab Building Renderings  
USDA-ARS  
Laboratory Modernization  
Tift County, Georgia





- New Construction
- Project Boundary

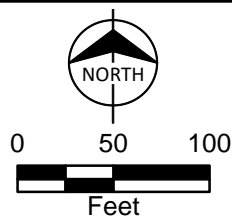
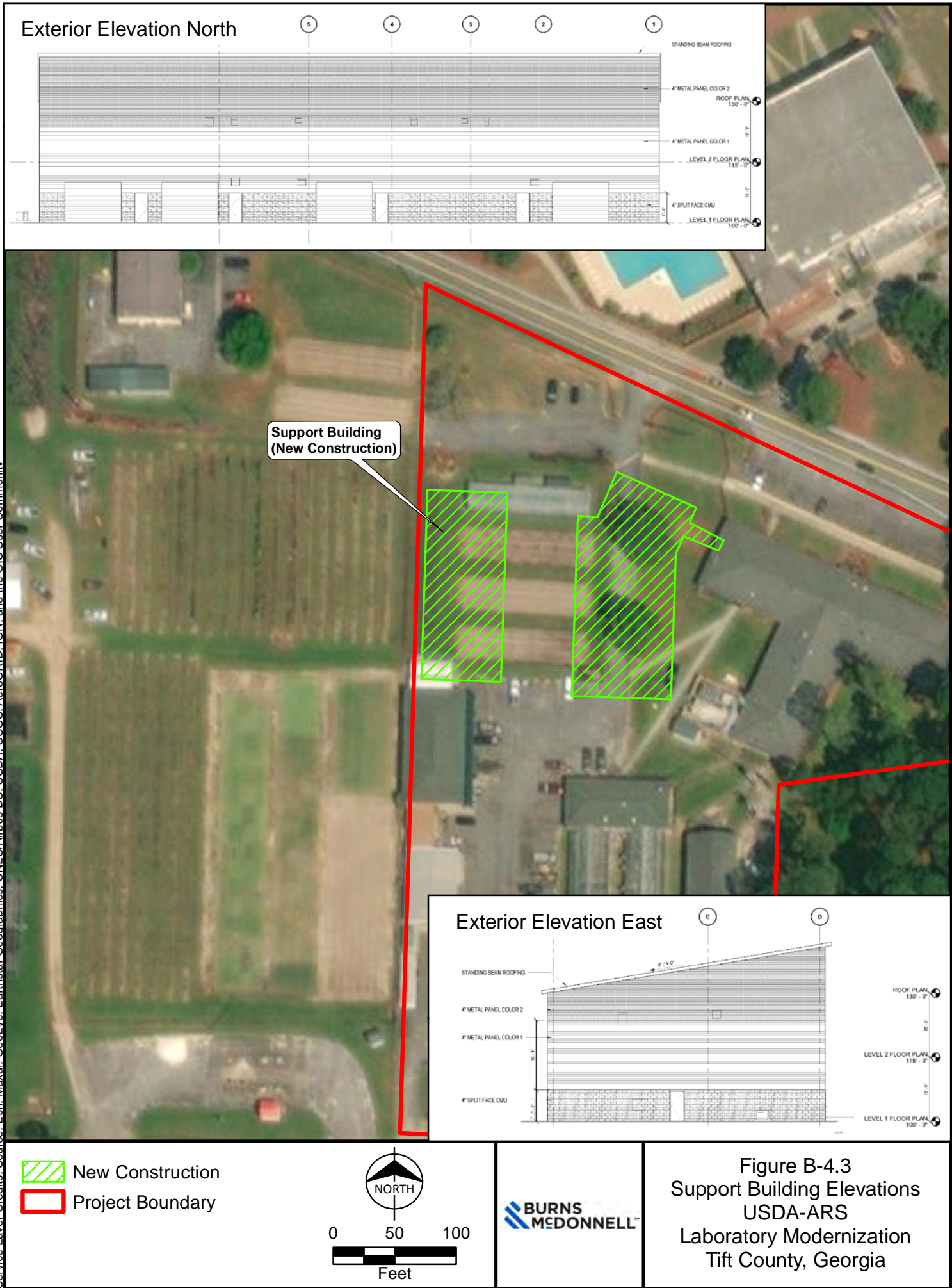


Figure B-4.2  
 Lab Building Elevations  
 USDA-ARS  
 Laboratory Modernization  
 Tift County, Georgia







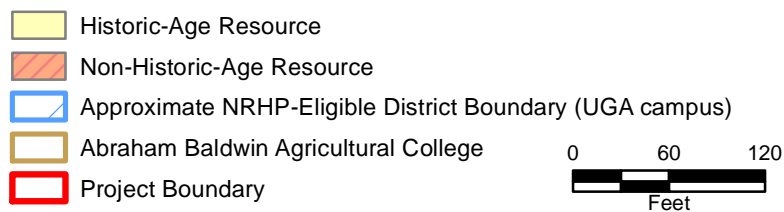
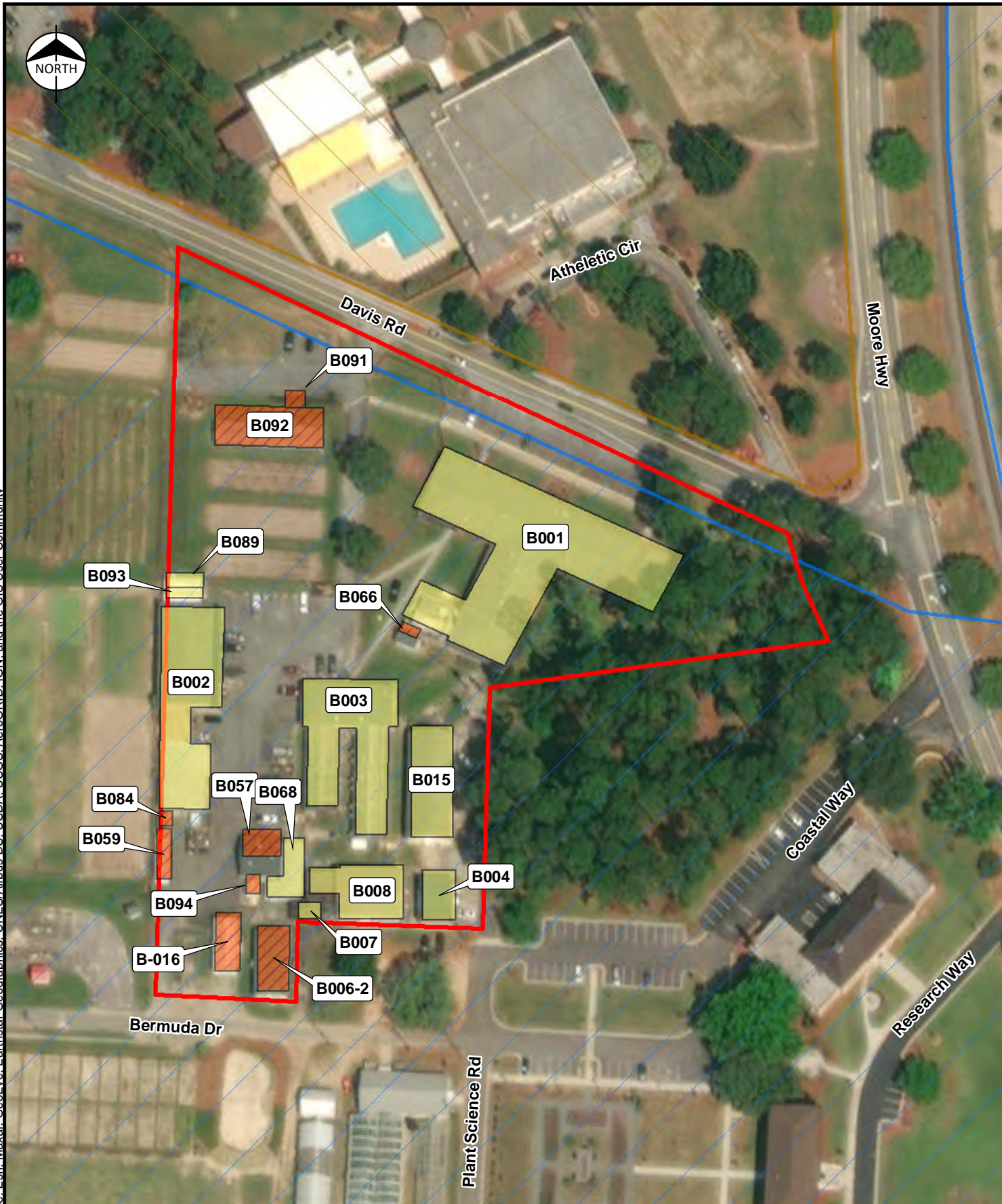
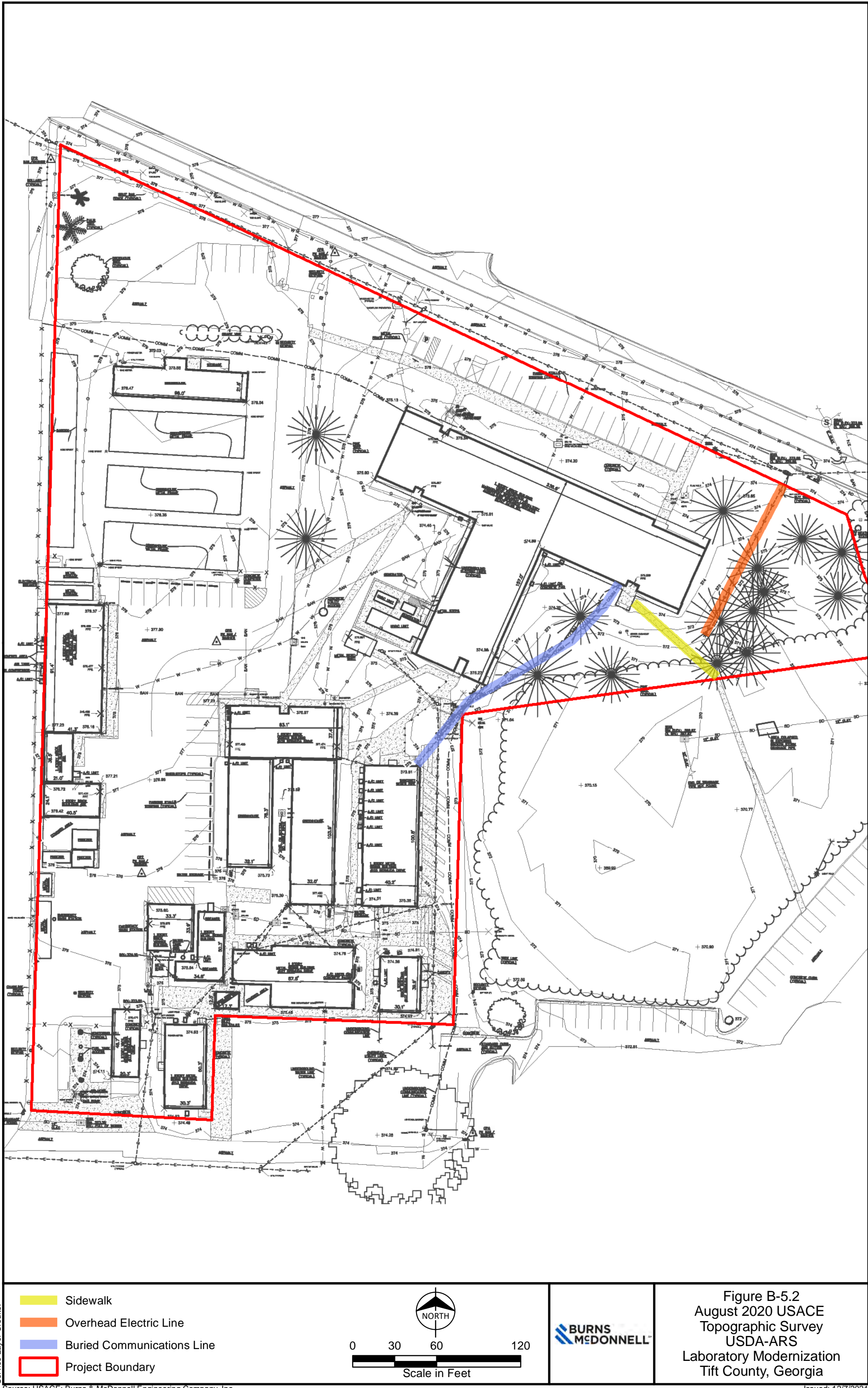


Figure B-5.1  
 Resource Location Map  
 USDA-ARS  
 Laboratory Modernization  
 Tift County, Georgia



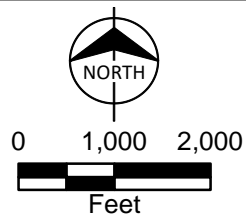
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 Project Boundary



 BURNS  
MCDONNELL

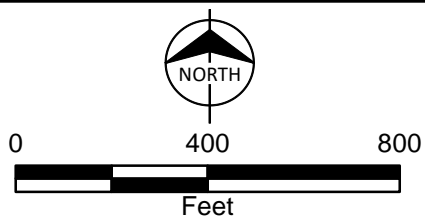
Figure B-6  
1910 USDA Soil Survey  
USDA-ARS  
Laboratory Modernization  
Tift County, Georgia



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Service Layer Credits



 Project Boundary

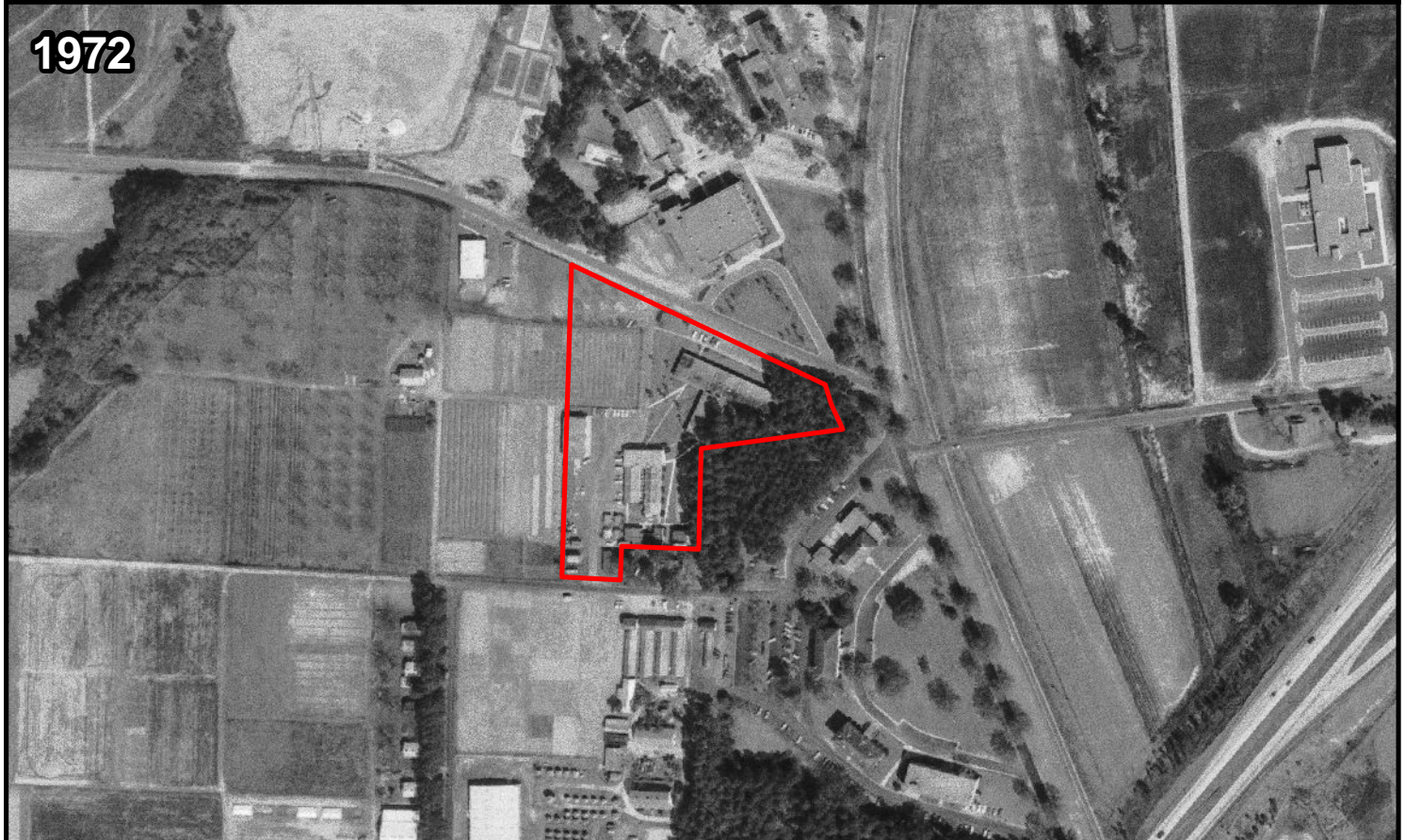


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Figure B-7.1  
Historic 1937 & 1948 Aerials  
USDA-ARS  
Laboratory Modernization  
Tift County, Georgia



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Project Boundary



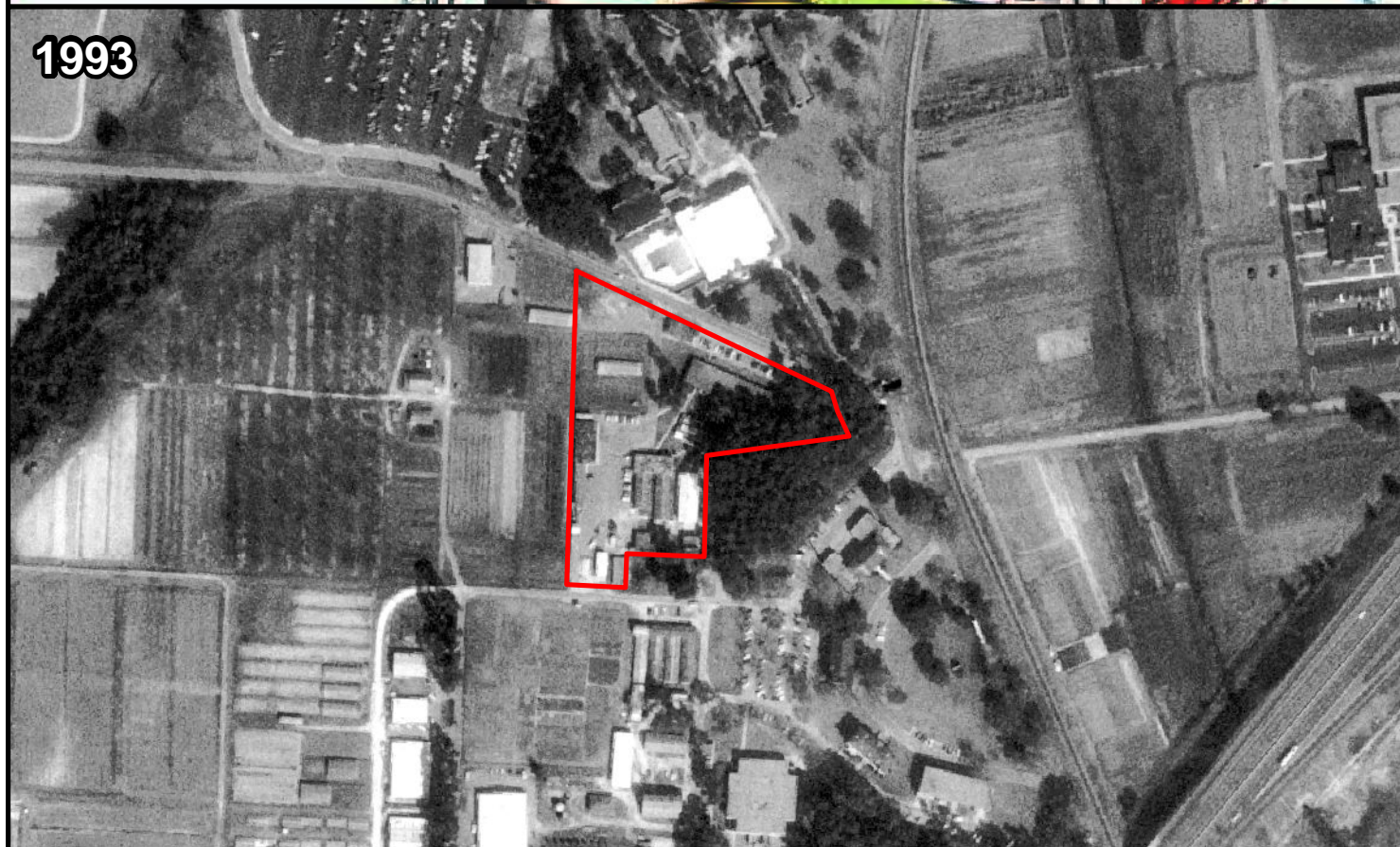
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Figure B-7.2  
Historic 1962 & 1972 Aerials  
USDA-ARS  
Laboratory Modernization  
Tift County, Georgia



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Service Layer Credits



Project Boundary



0 200 400



Base Map: USGS 1:24k "Tifton West"  
Quadrangle, 1973.

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Figure B-7.3  
Historic 1973 Topo & 1993 Aerials  
USDA-ARS  
Laboratory Modernization  
Tift County, Georgia

**ATTACHMENT C -PHOTOGRAPHS**





Photograph C-1: Overview of B001, primary façade, camera facing southwest.



Photograph C-2: Overview of B001, lateral and rear elevations, camera facing northeast.





Photograph C-3: Detail view of B001, camera facing south.



Photograph C-4: View of main entrance, B001, camera facing southeast.





Photograph C-5: Overview of B001, camera facing southwest.



Photograph C-6: View of B001, camera facing southeast.





Photograph C-7: View of rear entrance, B001, camera facing north.



Photograph C-8: View of 1982 HVAC equipment associated with B001, camera facing east.





Photograph C-9: Overview of B002, camera facing northwest.



Photograph C-10: View of B002, camera facing southwest.



Photograph C-11: View of original portion of B002, camera facing northwest.



Photograph C-12: View of hyphen connecting B002 to non-historic-age addition, camera facing west.





Photograph C-13: View of non-historic-age addition associated with B002, camera facing west.



Photograph C-14: View of non-historic-age addition associated with B002, camera facing northwest.



Photograph C-15: View of B003 headhouse, camera facing south.



Photograph C-16: View of B003 greenhouse, camera facing northwest.





Photograph C-17: View of B003 greenhouses, camera facing northeast.



Photograph C-18: View of B004, camera facing southwest.





Photograph C-19: View of B008, camera facing east.



Photograph C-20: View of B008, camera facing south.





Photograph C-21: View of B008 (right), camera facing east.



Photograph C-22: View of B013, camera facing south.





Photograph C-23: View of B013 (center), camera facing southeast.



Photograph C-24: View of B013, camera facing east.





Photograph C-25: View of B015, camera facing northwest.



Photograph C-26: View of B015, camera facing south.



Photograph C-27: View of B016, camera facing southeast.



Photograph C-28: View of B059, camera facing north.





Photograph C-29: View of B059, camera facing northwest.



Photograph C-30: View of B066, camera facing east.





Photograph C-31: View of B066, camera facing west.



Photograph C-32: View of B066, camera facing northeast.





Photograph C-33: View of B068, camera facing southwest.



Photograph C-34: View towards B084, camera facing northwest.



Photograph C-35: View of B084, camera facing west.



Photograph C-36: View of B084, camera facing west-northwest.





Photograph C-37: View of B089, camera facing south.



Photograph C-38: View of B091 (non-historic-age; left) and B092 (hoop house), camera facing southeast.





Photograph C-39: View of hoop house remnants (left) and B092 (right), camera facing southwest.



Photograph C-40: View of B092, camera facing east.





Photograph C-41: View of B093 (left) and B089 (right), camera facing west.



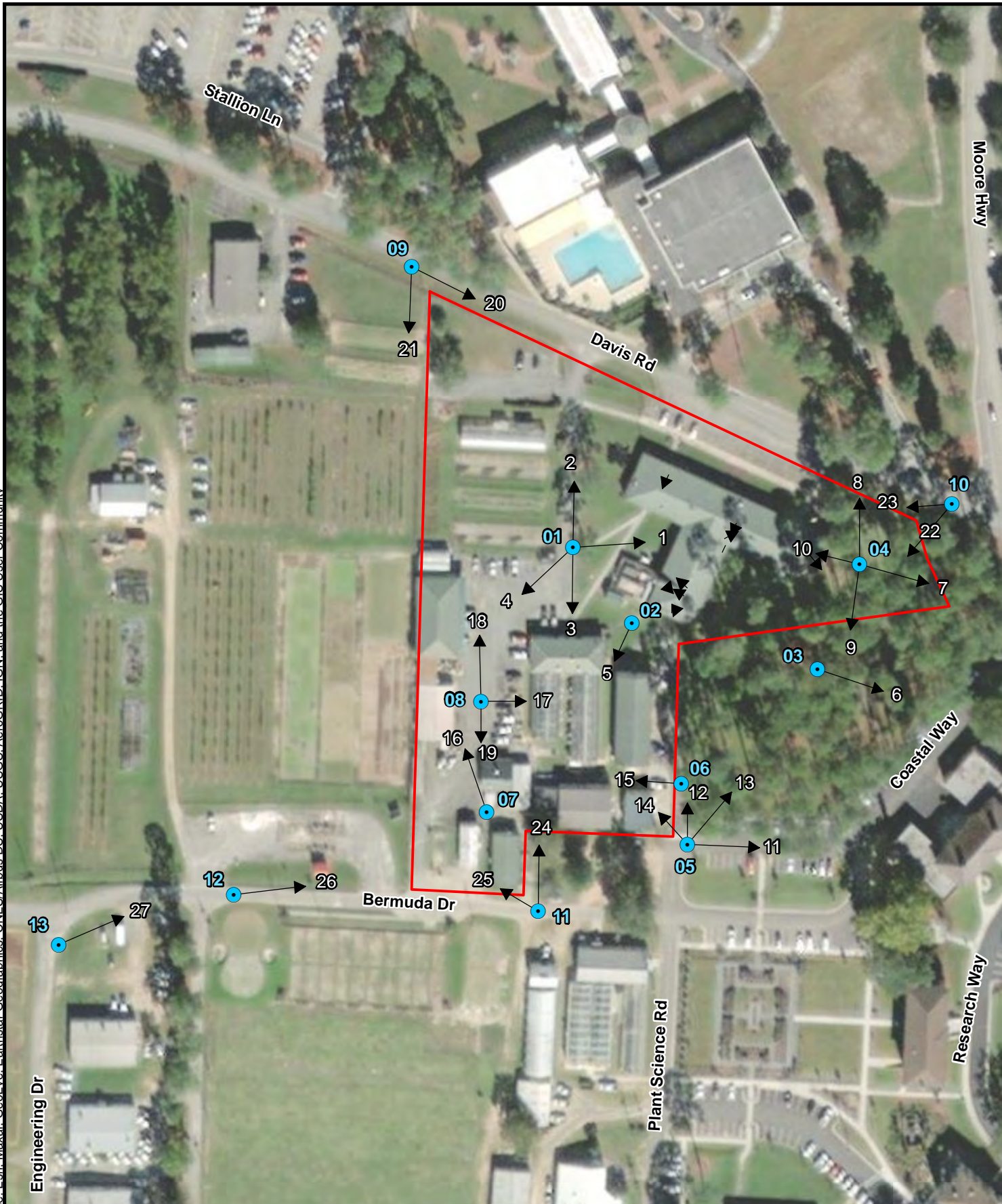
Photograph C-42: View of B057 (left, non-historic-age) and B094 (right), camera facing west.





Photograph C-43: View of B094, camera facing west.

**ATTACHMENT D - CONTEXT PHOTOGRAPHS**



- Photo Point
- ➔ Photo Direction
- ▭ Project Boundary

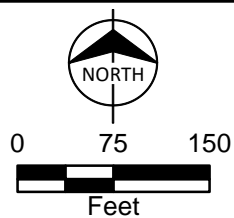


Figure D-1  
 Contextual Photographs  
 USDA ARS Laboratory Tifton  
 USACE  
 Tift County, Georgia





Photograph D-1: Photo Point 01, setting overview showing B001 from main entry drive, camera facing east.



Photograph D-2: Photo Point 01, view of towards Davis Road from main entry drive, camera facing north.





Photograph D-3: Photo Point 01, toward B003 from main entry drive, camera facing south.



Photograph D-4: Photo Point 01, view towards B002 from main entry drive, camera facing southwest.





Photograph D-5: Photo Point 02, view towards B003 from rear of B001, camera facing southwest.



Photograph D-6: Photo Point 03, view towards Moore Highway, camera facing east.





Photograph D-7: Photo Point 04, view towards Moore Highway, camera facing east.



Photograph D-8: Photo Point 04, view towards Davis Road, camera facing north.





Photograph D-9: Photo Point 04, camera facing south.



Photograph D-10: Photo Point 04, view towards B001, camera facing north.





Photograph D-11: Photo Point 05, setting view towards Costal Way, camera facing east.



Photograph D-12: Photo Point 05, view towards B015 and B001, camera facing north.





Photograph D-13: Photo Point 05, view towards B001, camera facing northeast.



Photograph D-14: Photo Point 05, view towards B015 and B004, camera facing northwest.





Photograph D-15: Photo Point 06, view towards B057, camera facing west.



Photograph D-16: Photo Point 07, view towards B002, camera facing northwest.





Photograph D-17: Photo Point 08, view towards B003, camera facing east.



Photograph D-18: Photo Point 08, view of towards Resources B002 and B092, camera facing north.





Photograph D-19: Photo Point 08, view towards B057, camera facing south.



Photograph D-20: Photo Point 09, overview of Project from Davis Road, camera facing east.





Photograph D-21: Photo Point 09, overview of campus from Davis Road, camera facing south.



Photograph D-22: Photo Point 10, view of proposed parking area from Davis Road, camera facing south.





Photograph D-23: Photo Point 10, view from Davis Road towards B001, camera facing southwest.



Photograph D-24: Photo Point 11, from Bermuda Drive towards B007, camera facing north.





Photograph D-25: Photo Point 11, view from Bermuda Drive towards B006, camera facing northwest.



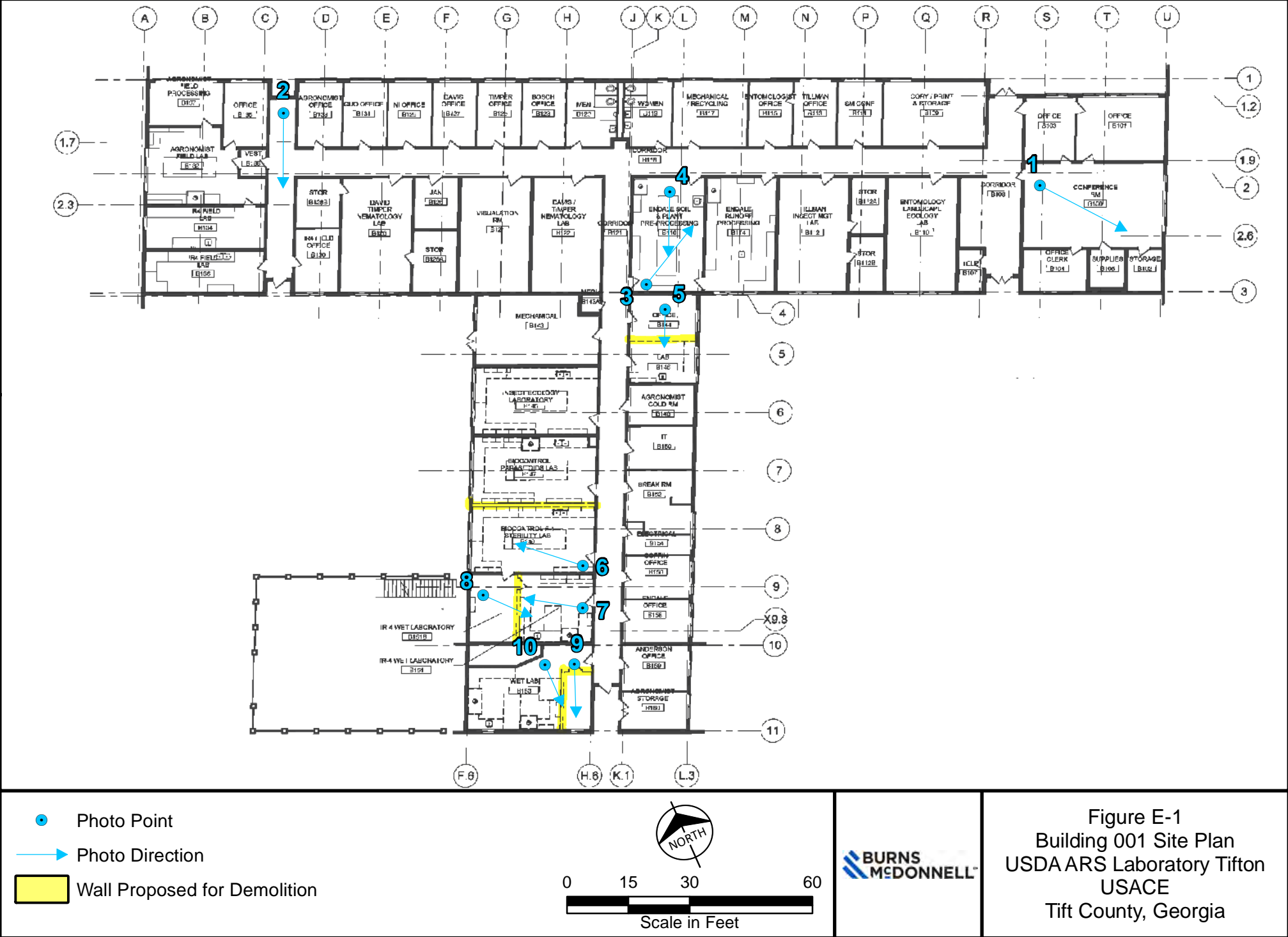
Photograph D-26: Photo Point 12, view from Bermuda Drive towards campus, camera facing east.



Photograph D-27: Photo Point 13, view from Bermuda Drive towards campus, camera facing east.

**ATTACHMENT E - BUILDING 001 ADDITIONAL DOCUMENTATION**







Photograph E-1: Interior view of B100 (Conference Room) showing light fixtures and ceiling tiles proposed for replacement, camera facing east.



Photograph E-2: Interior view of B001 near VEST B138 showing light fixtures and ceiling tiles proposed for replacement, camera facing south.



Photograph E-3: Interior view of B116 (Endale Soil & Plant Pre-Processing) showing light fixtures and ceiling tiles proposed for replacement, camera facing northeast.



Photograph E-4: Interior view of B116 (Endale Soil & Plant Pre-Processing) showing light fixtures and ceiling tiles proposed for replacement, camera facing south.





Photograph E-5: Interior view of B144 (Office) in B001 showing wall to be demolished between office space and laboratory, camera facing south.



Photograph E-6: Interior view of B149 (Sterility Laboratory) in B001 showing wall to be demolished to facilitate expansion of the laboratory space, camera facing northwest.



Photograph E-7: Interior view of B151 (Wet Laboratory) in B001 showing wall proposed for demolition to increase size of laboratory space, camera facing northwest.



Photograph E-8: Interior view of B151B (Wet Laboratory) in B001, camera facing east.





Photograph E-9: Interior view of B153 (Wet Laboratory) in B001; proposing to demolish walls to incorporate closet into larger laboratory space, camera facing south.



Photograph E-10: Interior view of B153 (Wet Laboratory) in B001 showing proposed expansion area, camera facing southeast.



February 14, 2022

Brandy Harris  
Senior Cultural Resources Specialist  
Burns & McDonnell  
8911 Capitol of Texas Highway, Building 3, Suite 3100  
Austin, Texas 78759

**RE: USDA-ARS Laboratory Modernization Project, Davis Road, Tifton  
Tift County, Georgia  
HP-210910-003**

Dear Ms. Harris:

The Historic Preservation Division (HPD) has received the information submitted concerning the above referenced project. Our comments are offered to assist the U.S. Department of Agriculture (USDA), Agricultural Research Service (ARS) in complying with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA).

The subject project consists of modernization activities at the USDA-ARS Tifton Campus along Davis Road in Tifton, including replacing ceiling tiles, lighting, and HVAC units and demolishing four interior walls in the circa 1962 building B001, demolishing the circa 1990s B091 and B092 structures as well as the circa mid to late-1970s B089 and B093 and circa 1980s B084 structures, realigning the north-south drive through the campus, constructing a three-story laboratory building with a connector to building B001 and a separate two-story support building along with associated parking areas, and relocating the circa 1980s B059 structure. Based on the information provided, HPD concurs that the USDA-ARS Tifton Campus is eligible for listing in the National Register of Historic Places (NRHP). Therefore, it is HPD's opinion that the project, as currently proposed, constitutes an **adverse effect** to historic properties that are eligible for or listed in the NRHP, as defined in 36 CFR Part 800.5(a)(2). The scale and massing of the new construction, the alteration of exterior circulation spaces, including both automobile and pedestrian, away from the historic buildings and established hierarchy of spaces, and the alteration of the historic buildings' relationship to the setting and landscape is not consistent with the Secretary of the Interior's *Standards for the Treatment of Historic Properties*. If the scope of work (SOW) for this project changes so that it conforms to the Secretary's *Standards*, prior to drafting a Memorandum of Agreement (MOA), please forward the updated SOW to HPD for review and comment, once available.

HPD would like to note that this determination of an adverse effect is not the end of the Section 106 consultation process. When an adverse effect to a historic property is found, the federal agency must notify the Advisory Council on Historic Preservation (ACHP) of the determination and draft a MOA to resolve the adverse effect. If the federal agency delegates ACHP notification responsibility to the applicant, the applicant should utilize the ACHP's e-notification system available here: <https://www.achp.gov/e106-email-form>. If the federal agency delegates the drafting of a MOA to the applicant, the applicant should visit the ACHP's *Guidance on Agreement Documents* webpage, found here: <https://www.achp.gov/initiatives/guidance-agreement-documents> and utilize the MOA template found therein.

Please include all avoidance and minimization measures, along with mitigation proposed to resolve the adverse effect, as stipulations in the draft MOA. HPD will review the draft MOA and should be provided the opportunity to review any associated deliverables stipulated therein, within 30 days of receipt. Absent federal agency involvement, HPD is available to provide technical assistance in resolving adverse effects.

We look forward to working with you as this project progresses and to receiving either a revised SOW that is consistent with the Secretary's *Standards* or a draft MOA. Please refer to project number **HP-210910-003** in any future correspondence regarding this project. If we may be of further assistance, please contact Aspen Kemmerlin, Compliance Archaeologist, at (404) 486-6396 or [Aspen.Kemmerlin@dca.ga.gov](mailto:Aspen.Kemmerlin@dca.ga.gov) or Santiago Martinez, Environmental Review Historian, at (404) 486-6425 or [Santiago.Martinez@dca.ga.gov](mailto:Santiago.Martinez@dca.ga.gov).

V/r,

A handwritten signature in blue ink, appearing to read "Dave Crass", written over a horizontal line.

Dr. David Crass  
Division Director  
Deputy State Historic Preservation Officer

DCC/sdm

cc: Michael Jacobs, Southern Georgia Regional Commission  
Nicholas Girken, USDA-ARS

### **Attachment 3 – Consulting Party Materials**



## CONSULTING PARTIES LETTER OF INVITATION

March 22, 2022

**Re: United States Department of Agriculture-Agricultural Research Service (USDA-ARS)  
Laboratory Modernization Project (HP-210910-003), Davis Road, Tifton, Tift County,  
Georgia**

Dear XXXX:

The United States Department of Agriculture's Agricultural Research Service (USDA-ARS) is proposing a consolidation and modernization project (Project) at their research facility in Tifton, Georgia (Attachment 1: Figure 1). The proposed federal undertaking requires compliance with Section 106 of the National Historic Preservation Act (NHPA). The 5.25-acre USDA-ARS Tifton Campus supports the Southeast Watershed Research Unit (SEWRU) and the Crop Genetics and Breeding Research Unit (CGBRU) research facilities. SEWRU's water resources research includes systems research on the feedbacks between agricultural practices, environmental conditions, pest management, and the role water plays in linking these components of agricultural systems. CGBRU conducts research to improve breeding methods and plant genetics for improved crop yields, enhanced environmental quality, and pest management strategies. Research is conducted on warm season grasses (forage and turf), corn, peanuts, and sorghum. The USDA-ARS Tifton Administrative Officer and staff serve both the SEWRU and CGBRU, as well as the National Peanut Research Laboratory in Dawson, Georgia.

The CGBRU and administrative staff occupy administrative and laboratory buildings on the USDA-ARS Tifton Campus and on the adjacent University of Georgia (UGA) campus. The USDA-ARS lease with University of Georgia (UGA) for these buildings expires in 2023. The proposed Project would provide more laboratory and administrative space on the USDA-ARS Tifton Campus and would reduce the amount of leased space from UGA. The proposed Project would include demolishing outdated structures, constructing new buildings, renovating the largest laboratory building on the Tifton Campus (B001), and upgrading utility and roadway infrastructure (Attachment 1: Figures 2 and 3.1 through 3.3).

Extant buildings and structures associated with the campus vary in size, materials, and age (Table 1; Attachment 1: Figure 4). There are six one-story, brick masonry buildings on the USDA-ARS Tifton Campus constructed in the 1960s. In addition to buildings, there are 17 additional structures and equipment on site including storage sheds, mobile storage units, outdoor cold storage units, and greenhouses, which serve as agriculture research space, office space, and storage. The support structures were constructed between the 1960s and 2000s in response to the changing needs of the researchers.

Consultation between USDA-ARS and the Georgia Historic Preservation Division (HPD), which serves as the State Historic Preservation Office (SHPO), resulted in a determination that the USDA-ARS Tifton Campus is eligible for inclusion in the National Register of Historic Places (NRHP). Though the buildings are not individually NRHP eligible, the complex maintains associations with defined historic contexts and agricultural research endeavors and is similar aesthetically to contributing features of the adjacent NRHP-eligible University of Georgia (UGA) Tifton Historic district. As a result, the permanent and recognizable historic-age components of the USDA-ARS Tifton Campus are NRHP-eligible as contributing resources to the district. The resources are significant under Criterion A in the areas of agriculture and education and under Criterion C as examples of purpose-driven, research-related architecture, significant for their form, function, and place within the larger campus landscape rather than for individual design or stylistic qualities. The SHPO determined the proposed modernization Project would have an adverse effect on the NRHP-

eligible resources as defined in Section 106 of the National Historic Preservation Act (NHPA) [36 CFR Part 800.5(a)(2)].

### Development of a Memorandum of Agreement

To account for the anticipated adverse effect to the NRHP-eligible USDA-ARS Tifton Campus, a Memorandum of Agreement (MOA) will be prepared to summarize the list of measures the USDA-ARS and other responsible parties will undertake as part of the Project to avoid, minimize, or mitigate impacts on historic (NRHP-eligible) resources. Table 1 lists the buildings and structures at the campus, including their name, NRHP eligibility status, and proposed demolition or renovation activities, as relevant. The buildings' locations are depicted on the figures in Attachment 1, and representative photographs are included as Attachment 2.

**Table 1: Buildings on USDA-ARS Tifton Campus**

Building	Building Purpose	Year Constructed	Proposed Action	Description of Proposed Action	NRHP Eligibility Determination
B001	Laboratories	1962	Renovate	Replace outdated infrastructure, including full HVAC replacement, ceiling and lighting replacement, main switchgear replacement, and minor interior renovations and demolition of non-load bearing walls.	Contributing (NRHP Criteria A and C)
B002	Service Shop	1962	No Action	N/A	Contributing (NRHP Criteria A and C)
B003	Headhouse and Greenhouses	1962	No Action	N/A	Contributing (NRHP Criteria A and C)
B004	CPMRU Insect Rearing Annex	1965	No Action	N/A	Contributing (NRHP Criteria A and C)
B006 (two buildings)	Warehouses	2002	No Action	N/A	Not Eligible/Non-Contributing
B007	Chemical Storage	1965	No Action	N/A	Contributing (NRHP Criteria A and C)
B008	Laboratory/Insectary Field Lab	1965	No Action	N/A	Contributing (NRHP Criteria A and C)
B013	Equipment Storage	1972	No Action	N/A	Contributing (NRHP Criteria A and C)
B015	Insect Laboratory	1974	No Action	N/A	Contributing (NRHP Criteria A and C)
B057	Auxiliary Building	Post-1993	No Action	N/A	Not Eligible/Non-Contributing
B059	Hazardous Material Waste Storage	1980s	Demolish and reconstruct at new location	Location of new drying barns	Not Eligible/Non-Contributing
B066	Shed	1980s	No Action	N/A	Not Eligible/Non-Contributing

Building	Building Purpose	Year Constructed	Proposed Action	Description of Proposed Action	NRHP Eligibility Determination
B084	Chemical Storage	1980s	Demolish and Reconstruct	Location of new drying barns. A new chemical storage building would be constructed adjacent to B002	Not Eligible/Non-Contributing
B089	Drying Barns	Post 1972	Demolish and Reconstruct	Location of new hazardous material waste storage building. New drying barns will be constructed where B084 and B059 are currently located.	Not Eligible/Non-Contributing
B091	Shed next to greenhouse	2000	Demolish and Reconstruct	Location of new Support Building, new Laboratory Building, and new roadway alignment	Not Eligible/Non-Contributing
B092	Hoop Houses	Post 1993	Demolish and Reconstruct	Location of new Support Building, new Laboratory Building, and new roadway alignment	Not Eligible/Non-Contributing
B093	Drying Barns	Post 1972	Demolish and Reconstruct	Location of new hazardous material waste storage building. New drying barns will be constructed where B084 and B059 are currently located.	Not Eligible/Non-Contributing
B094	Oil Storage	2000	No Action	N/A	Not Eligible/Non-Contributing

### Consulting Party Request

With this letter, USDA-ARS is seeking coordination with your agency as a consulting party. This designation does not imply that your agency either supports the proposed Project or has any special expertise with respect to evaluation of the proposed Project. Consulting parties have certain rights and obligations under the NHPA and its implementing regulations at 36 CFR Part 800. By becoming a consulting party, you will be actively informed of steps in the Section 106 process and you will be asked to participate in:

- development of the MOA, including identification of potential mitigative measures
- define additional survey requirements, including areas of potential effect (APEs) based on proposed demolition plans in relation to other historic or archaeological resources at the facility
- vetting and approval of mitigation measures once implemented

To become a consulting party, please respond to Nicholas Girken at [Nicholas.Girken@usda.gov](mailto:Nicholas.Girken@usda.gov) by **April XX, 2022**. If you do not respond within this timeframe, you may request consulting party status in the future, but the Project may continue to advance without your input. If you are requesting consulting party status, we ask that your (**agency/tribe**) nominate one representative and an alternate to participate on behalf of the group. In your response, please provide the contact information for your agency's primary point of contact and the alternate to allow us to update our contact list.

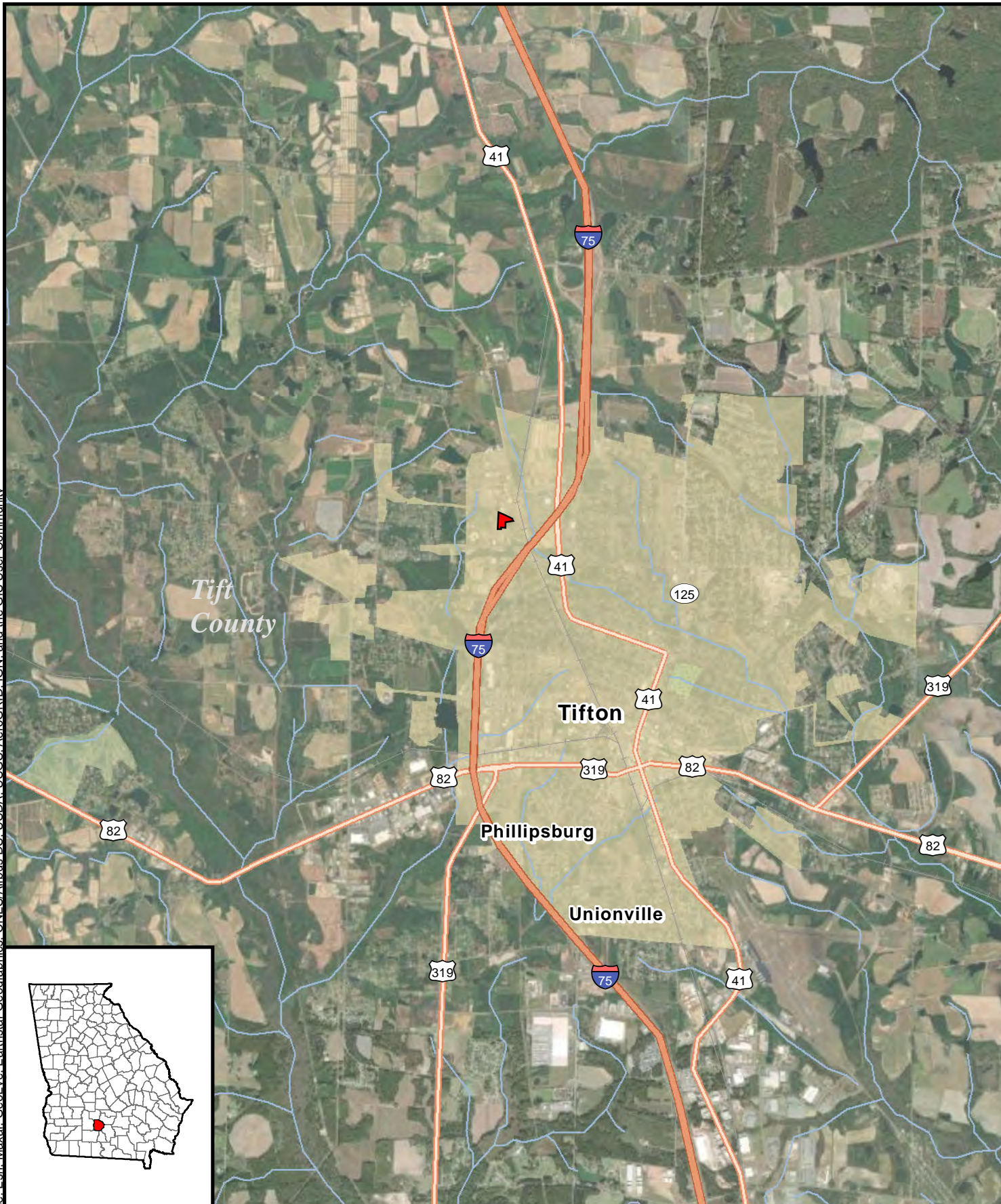


Sincerely,

Nicholas Girken

Cc: Santiago Martinez, Georgia SHPO  
Shauna Stotler, USACE  
Andrea Farmer, USACE

## Attachment 1 – Figures



 Project Boundary

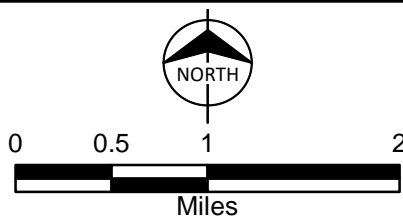
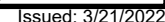


Figure 1  
Project Location  
USDA-ARS  
Laboratory Modernization  
Tift County, Georgia







NW Approach



NE Birdseye

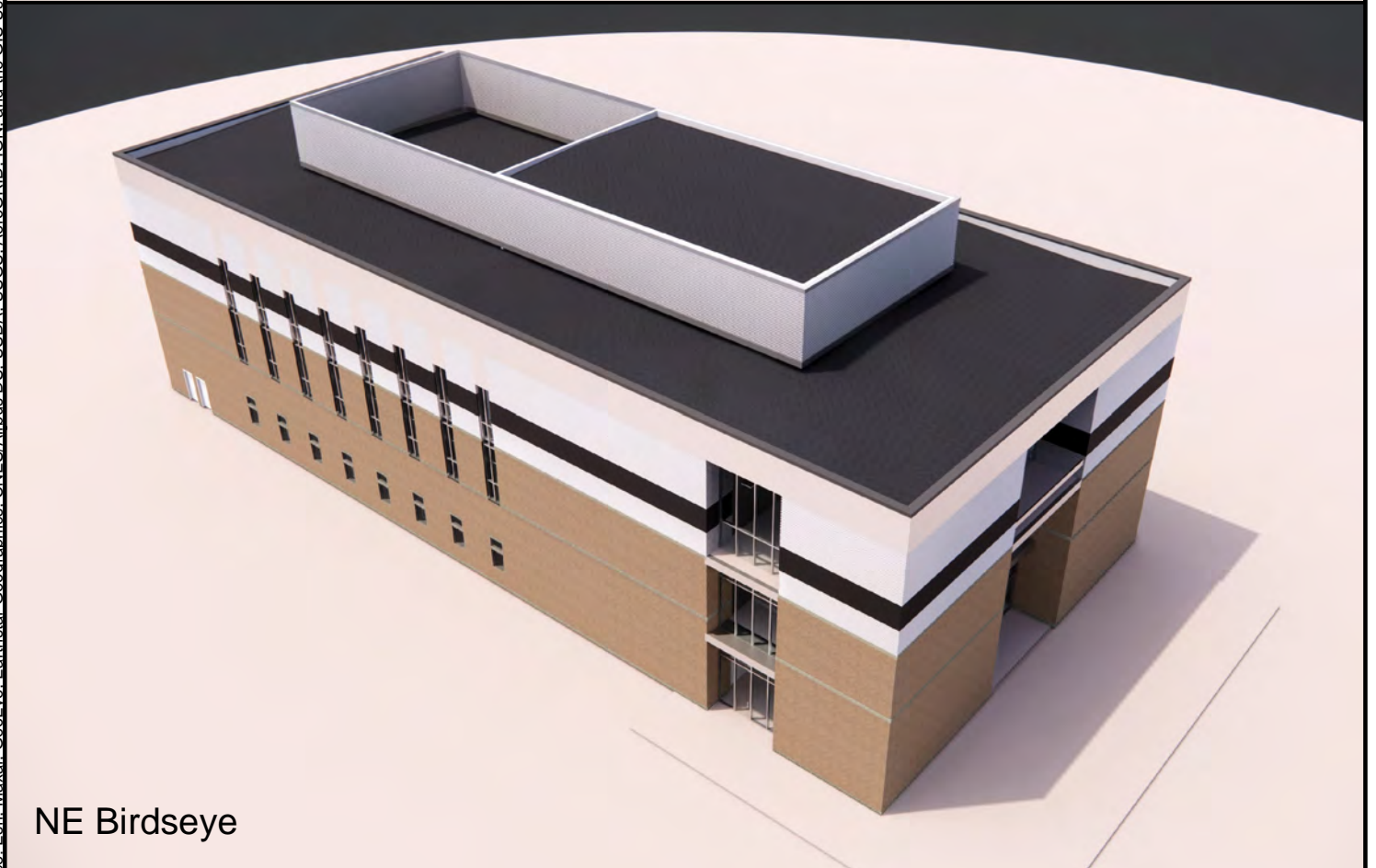
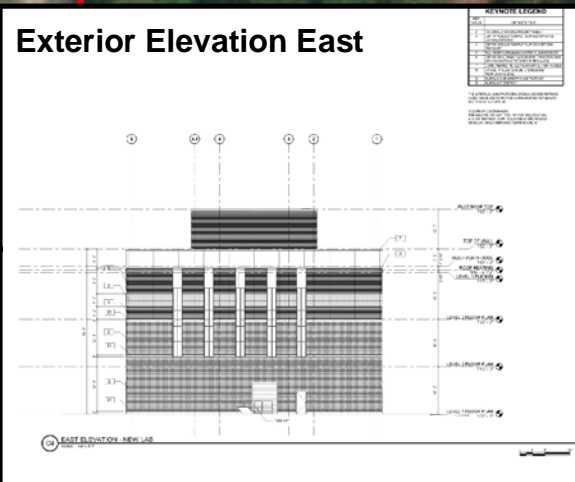
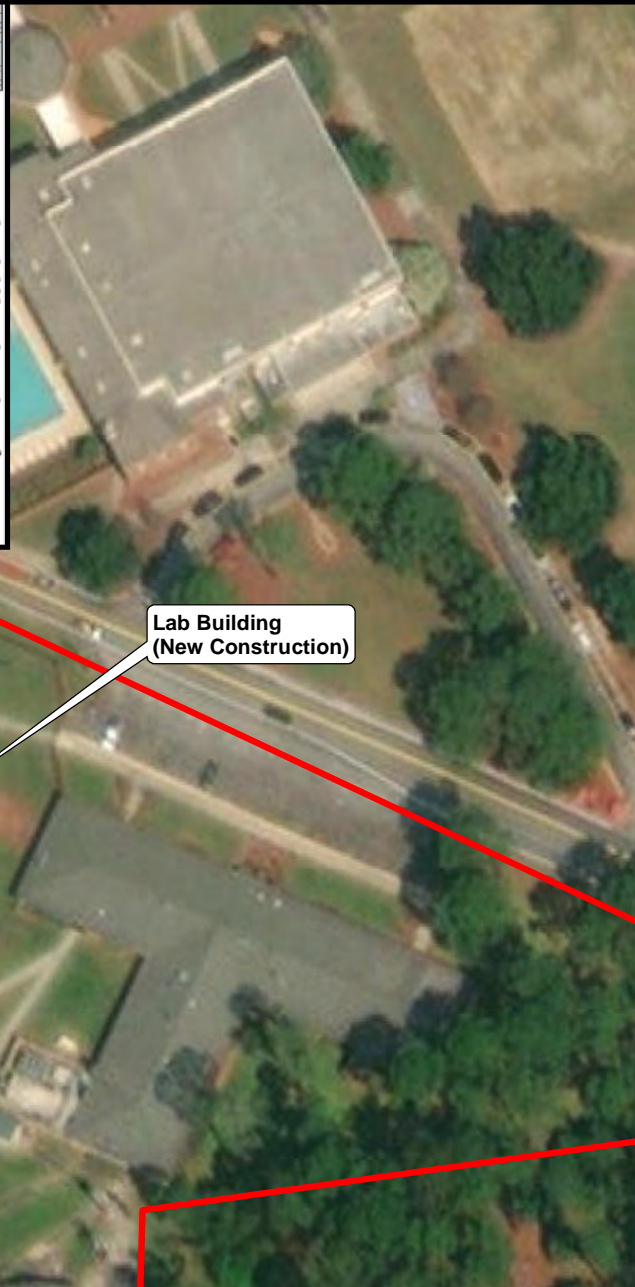
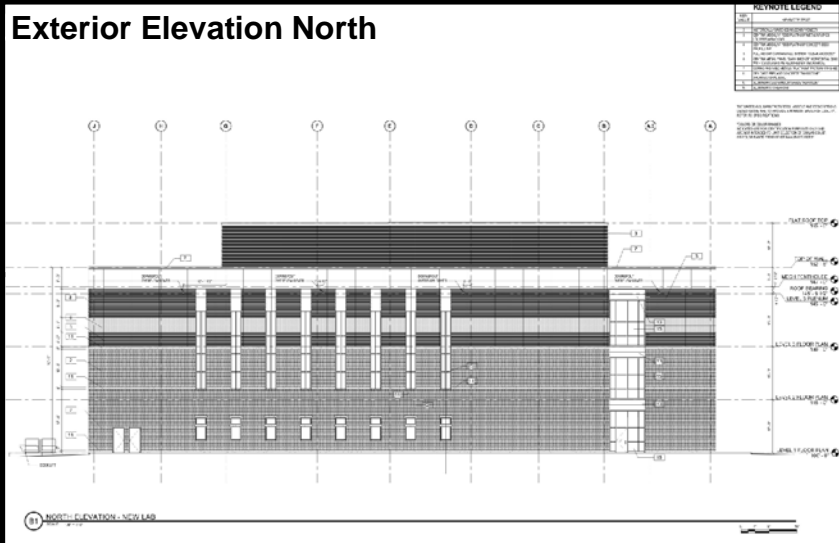




Figure 3-1  
Lab Building Renderings  
USDA-ARS  
Laboratory Modernization  
Tift County, Georgia



 New Construction  
 Project Boundary

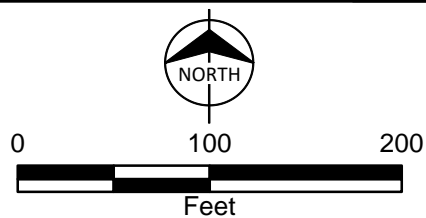
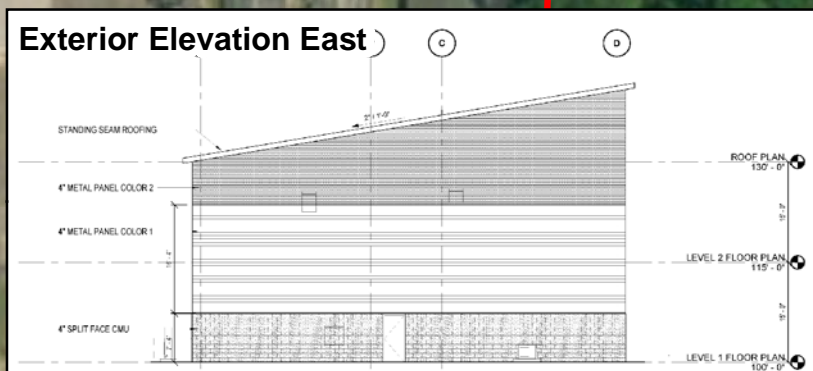
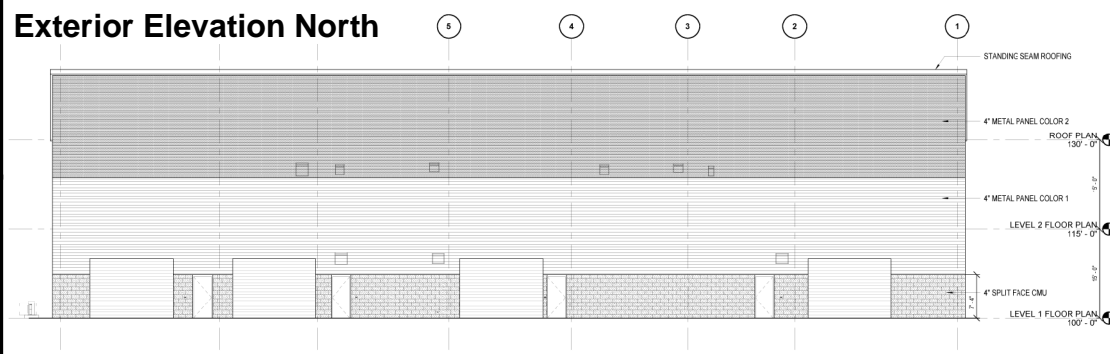




Figure 3-2  
Lab Building Elevations  
USDA-ARS  
Laboratory Modernization  
Tift County, Georgia



Path: Clients\ANFUSCOE\Sas\124975\_USDA-ARS-LAB\Studies\Geospatial\DataFiles\ArcDocs\CP\_Invitation\_Letter\Figure33\_RenderingSupport\_Tifton\_CP.mxd gacox 3/10/2022  
Service Layer Credits: Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community



-  New Construction
-  Project Boundary

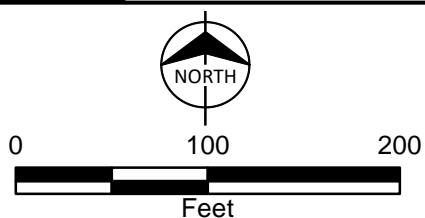
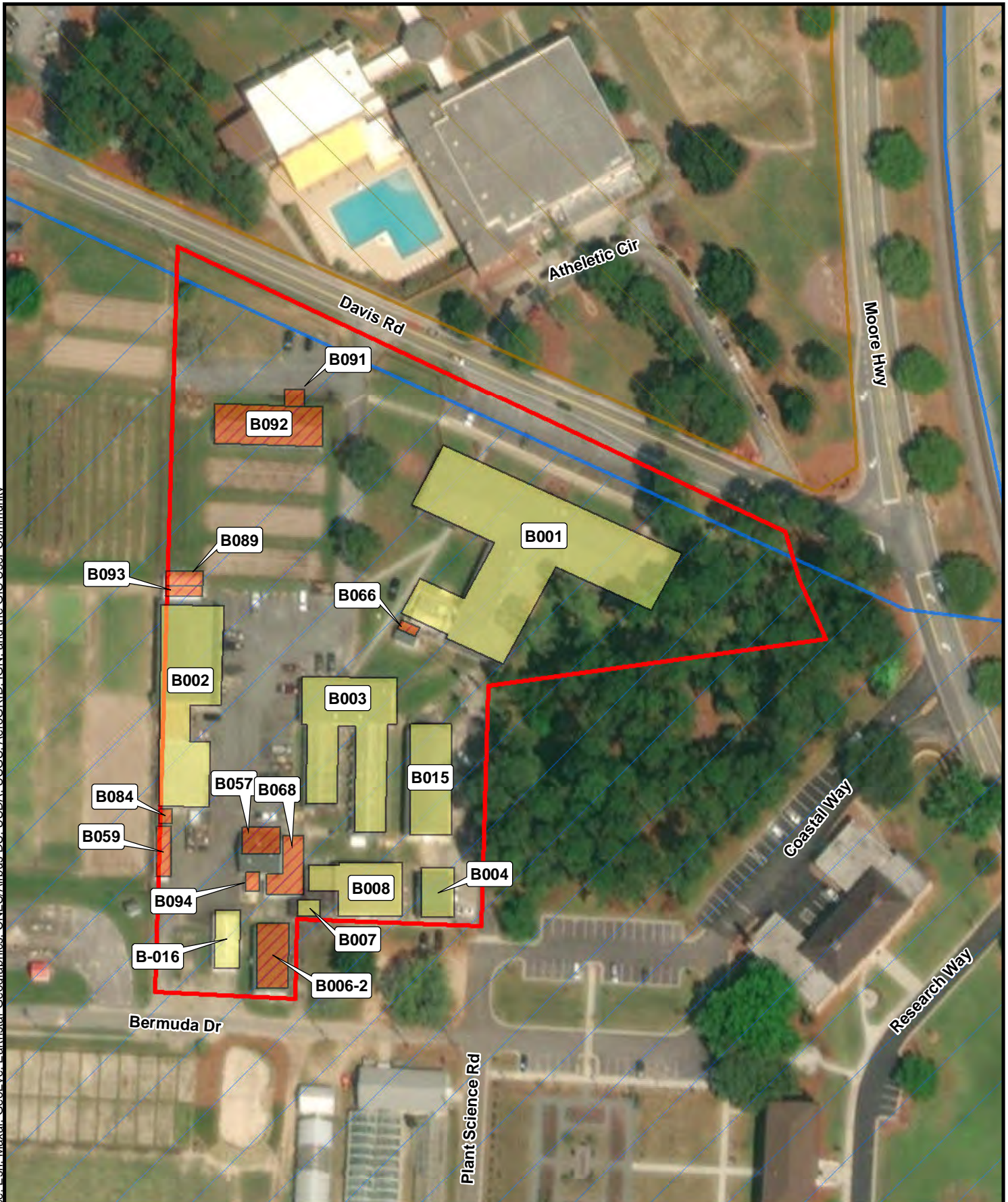
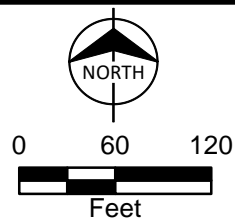


Figure 3-3  
Support Building Elevations  
USDA-ARS  
Laboratory Modernization  
Tift County, Georgia





- Contributing (NRHP Criteria A and C)
- Not Eligible / Non-Contributing
- Approximate NRHP-Eligible District Boundary (UGA campus)
- Abraham Baldwin Agricultural College
- Project Boundary



**Figure 4**  
**Resource Location Map**  
**USDA-ARS**  
**Laboratory Modernization**  
**Tift County, Georgia**

## Attachment 2 – Photographs





Photograph 1: Overview of B001, primary façade, camera facing southwest.



Photograph 2: View of main entrance, B001, camera facing southeast.





Photograph 3: Overview of B001, camera facing southwest.



Photograph 4: View of B001, camera facing southeast.



Photograph 5: Overview of B002, camera facing northwest.



Photograph 6: View of B002, camera facing southwest.





Photograph 7: View of B003 headhouse, camera facing south.



Photograph 8: View of B003 greenhouse, camera facing northwest.



Photograph 9: View of B003 greenhouses, camera facing northeast.



Photograph 10: View of B004, camera facing southwest.





Photograph 11: View of B008, camera facing east.



Photograph 12: View of B013, camera facing south.





Photograph 13: View of B015, camera facing northwest.



Photograph 14: View of B015, camera facing south.



Photograph 15: View of B016, camera facing southeast.



Photograph 16: View of B059, camera facing north.





Photograph 17: View of B059, camera facing northwest.



Photograph 18: View of B066, camera facing east.





Photograph 19: View of B068, camera facing southwest.



Photograph 20: View of B084, camera facing west-northwest.



Photograph 21: View of B089, camera facing south.



Photograph 22: View of B091 (non-historic-age; left) and B092 (hoop house), camera facing southeast.





Photograph 23: View of hoop house remnants (left) and B092 (right), camera facing southwest.



Photograph 24: View of B093 (left) and B089 (right), camera facing west.





Photograph 25: View of B057 (left, non-historic-age) and B094 (right), camera facing west.



Photograph 26: View of B094, camera facing west.





Photograph 27: View towards Davis Road from main entry drive, camera facing north.



Photograph 28: View towards B002 from main entry drive, camera facing southwest.





Photograph 29: Setting overview towards Moore Highway, camera facing east.



Photograph 30: Setting overview towards Davis Road, camera facing north.





Photograph 31: Setting view towards Coastal Way, camera facing east.



Photograph 32: Setting view towards B015 and B001, camera facing north.





Photograph 33: Setting overview of Project from Davis Road, camera facing east.



Photograph 34: Overview of campus from Davis Road, camera facing south.





Photograph 35: Setting view from Davis Road towards B001, camera facing southwest.



Photograph 36: View from Bermuda Drive towards campus, camera facing east.



**From:** [Costello, Lydia](#)  
**To:** [Costello, Lydia](#)  
**Subject:** FW: consulting party request  
**Date:** Wednesday, May 4, 2022 4:15:00 PM  
**Attachments:** [image003.png](#)  
[Fw Tifton Campus Consulting Party Invitation .msg](#)

---

---

**From:** Michael TOEWS <[mtoews@uga.edu](mailto:mtoews@uga.edu)>  
**Sent:** Wednesday, April 27, 2022 8:01 AM  
**To:** Girken, Nicholas - REE-ARS-CEC, Beltsville, MD <[Nicholas.Girken@usda.gov](mailto:Nicholas.Girken@usda.gov)>  
**Cc:** Scott Messer <[smesser@uga.edu](mailto:smesser@uga.edu)>  
**Subject:** consulting party request

Mr. Girken:

Re: United States Department of Agriculture-Agricultural Research Service (USDA-ARS)  
Laboratory Modernization Project (HP-210910-003), Davis Road, Tifton, Tift County,  
Georgia

Thank you for reaching out to the University of Georgia to participate as a consulting party to be actively informed of the steps in the Section 106 process and to participate in developing the MOA for this project. We request that two of our staff participate in the process. Scott Messer will be the official institutional contact and I will serve as the local on-sit contact. Contact information is as follows:

Scott E. Messer, Director - Historic Preservation  
Office of the University Architects  
The University of Georgia  
Athens, Georgia 30606  
(706) 542-7331  
[smesser@uga.edu](mailto:smesser@uga.edu)

Michael Toews, Assistant Dean  
UGA Tifton Campus  
2360 Rainwater Rd  
Tifton, GA 31793  
(229) 386-3149  
[mtoews@uga.edu](mailto:mtoews@uga.edu)

Yours,  
mt

**Michael D. Toews, Ph.D.**

UGA Tifton Campus | *Assistant Dean*

2360 Rainwater Rd | Tifton, GA 31793

229-386-3338 | [mtoews@uga.edu](mailto:mtoews@uga.edu) | <https://tifton.caes.uga.edu/about/leadership.html>



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**From:** [Costello, Lydia](#)  
**To:** [Costello, Lydia](#)  
**Subject:** FW: USDA-ARS Tifton Consolidation and Modernization Project Virtual Consulting Parties Meeting (HP-210910-003)  
**Date:** Tuesday, June 28, 2022 8:52:19 AM

---

Hello everyone,

USACE has a conflict on 6/24 at 1:30pm-2:30pm. Are you all available to meet earlier on 6/24 from 11am-12pm or 12pm-1pm EST?

Thanks in advance,

Lydia

-----Original Appointment-----

**From:** Harris, Brandy M <[bmharris@burnsmcd.com](mailto:bmharris@burnsmcd.com)>

**Sent:** Monday, June 6, 2022 8:11 AM

**To:** Harris, Brandy M; Santiago D. Martinez; Shauna Stotler; Farmer, Andrea A CIV (USA); Girken, Nicholas - REE-ARS-CEC, Beltsville, MD; [smesser@uga.edu](mailto:smesser@uga.edu); [mtoews@uga.edu](mailto:mtoews@uga.edu); Costello, Lydia; Kent, Sara S; King, William R

**Subject:** USDA-ARS Tifton Consolidation and Modernization Project Virtual Consulting Parties Meeting (HP-210910-003)

**When:** Friday, June 24, 2022 1:30 PM-2:30 PM (UTC-05:00) Eastern Time (US & Canada).

**Where:** Microsoft Teams Meeting

I have attached the working draft of the MOA for your review prior to our meeting. The pdf contains drafts of the proposed attachments. Please reach out with any questions.

Thanks!

---

## Microsoft Teams meeting

**Join on your computer or mobile app**

[Click here to join the meeting](#)

**Or call in (audio only)**

[+1 469-998-4311,311802149#](tel:+14699984311311802149) United States, Dallas

Phone Conference ID: 311 802 149#

[Find a local number](#) | [Reset PIN](#)

[Learn More](#) | [Meeting options](#)

---





June 7, 2022

Nicholas Girken  
Engineering Project Manager/Contracting Officer Representative  
USDA-ARS  
Administrative and Financial Management  
5601 Sunnyside Avenue  
Beltsville, MD 20705

Ref: *ARS Tifton Campus Consolidation and Modernization Project*  
*Tifton, Tift County, Georgia*  
*ACHP Project Number: 018357*

Dear Mr. Girken:

On May 19, 2022, the Advisory Council on Historic Preservation (ACHP) received your notification and supporting documentation regarding the potential adverse effects of the referenced undertaking on a property or properties listed or eligible for listing in the National Register of Historic Places. Based upon the information you provided, we have concluded that Appendix A, *Criteria for Council Involvement in Reviewing Individual Section 106 Cases*, of our regulations, "Protection of Historic Properties" (36 CFR Part 800) implementing Section 106 of the National Historic Preservation Act, does not apply to this undertaking. Accordingly, we do not believe our participation in the consultation to resolve adverse effects is needed.

However, if we receive a request for participation from the State Historic Preservation Officer, Tribal Historic Preservation Officer, affected Indian tribe, a consulting party, or other party, we may reconsider this decision. Should the undertaking's circumstances change, consulting parties cannot come to consensus, or you need further advisory assistance to conclude the consultation process, please contact us.

Pursuant to Section 800.6(b)(1)(iv), you will need to file the final Section 106 agreement document (Agreement), developed in consultation with the Georgia State Historic Preservation Office and any other consulting parties, and related documentation with the ACHP at the conclusion of the consultation process. The filing of the Agreement and supporting documentation with the ACHP is required in order to complete the requirements of Section 106 of the National Historic Preservation Act.

Thank you for providing us with your notification of adverse effect. If you have any questions or require our further assistance, please contact Alexis Clark at (202) 517-0208 or by e-mail at [aclark@achp.gov](mailto:aclark@achp.gov) and

reference the ACHP Project Number above.

Sincerely,

A handwritten signature in cursive script that reads "Artisha Thompson". The signature is written in black ink and is positioned above the printed name and title.

Artisha Thompson  
Historic Preservation Technician  
Office of Federal Agency Programs

# Section 106 Consultation Meeting

Laboratory Modernization Project (HP-210910-003)

Davis Road, Tifton, Tift County, Georgia



Agricultural Research Service

U.S. DEPARTMENT OF AGRICULTURE  
(USDA-ARS)



# Project Background

## Proposed Undertaking

- **Proposed Project**

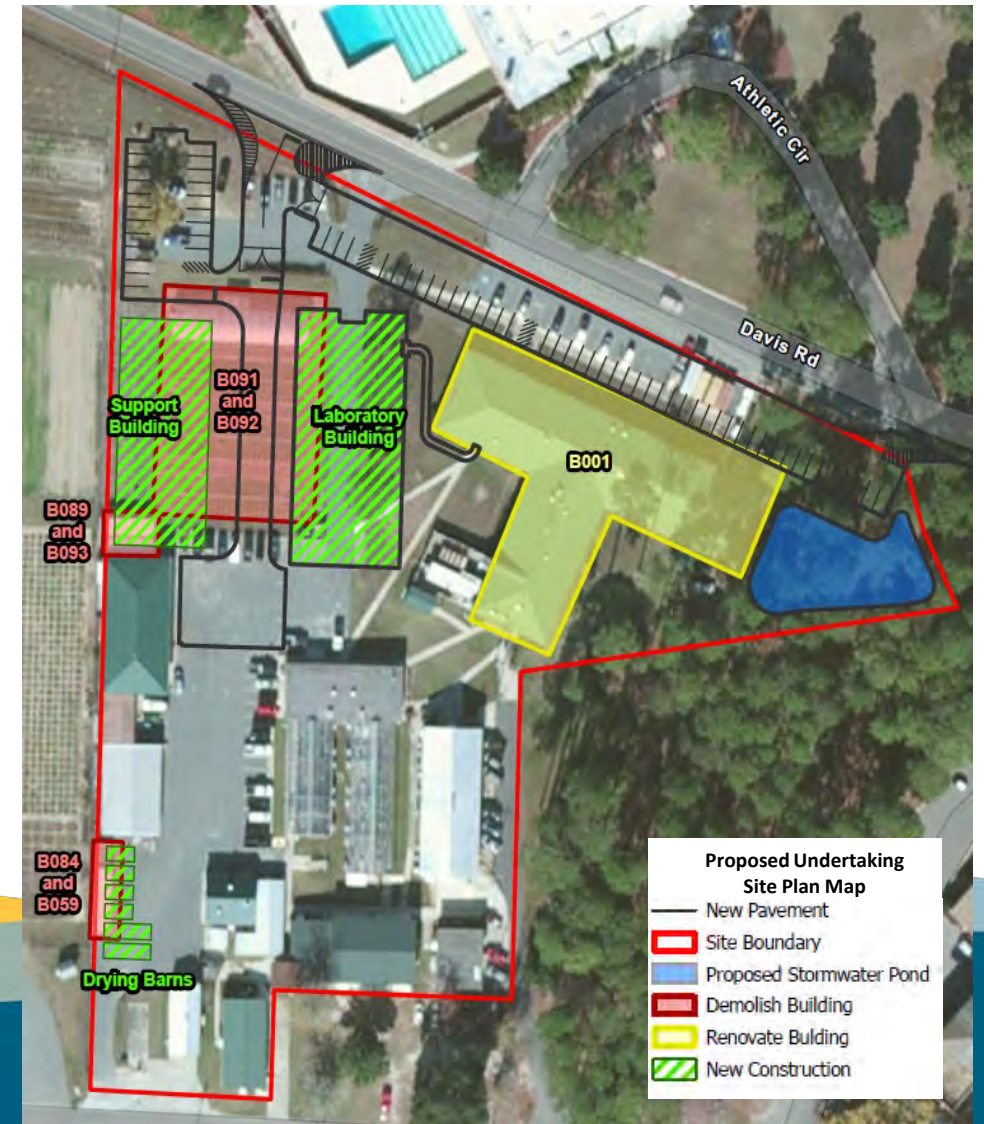
- The proposed project would include demolishing outdated structures, constructing new buildings, renovating the largest laboratory building on the Tifton Campus (B001), and upgrading utility and roadway infrastructure.

- **Function of the USDA-ARS Research Facilities**

- The 5.25-acre USDA-ARS Tifton Campus supports the Southeast Watershed Research Unit (SEWRU) and the Crop Genetics and Breeding Research Unit (CGBRU) facilities.

- **Purpose of the Project**

- The proposed project would provide more laboratory and administrative space on the USDA-ARS Tifton Campus and would reduce the amount of leased space from UGA.



# Project Background

## USDA-ARS Tifton Campus Resources

- **19** buildings and structures on the USDA-ARS Tifton Campus
- **10** are of historic age:
  - B001
  - B002
  - B003
  - B004
  - B007
  - B008
  - B013
  - B015
  - B089
  - B093

Building	Building Purpose	Year Constructed	Proposed Action
<b>B001</b>	<b>Laboratories</b>	<b>1962</b>	<b>Renovate</b>
<b>B002</b>	Service Shop	1962	No Action
<b>B003</b>	Headhouse and Greenhouses	1962	No Action
<b>B004</b>	CPMRU Insect Rearing Annex	1965	No Action
<b>B006-1; B006-2</b>	Warehouses	2002	No Action
<b>B007</b>	Chemical Storage	1965	No Action
<b>B008</b>	Laboratory/Insectary Field Lab	1965	No Action
<b>B013</b>	Equipment Storage	1972	No Action
<b>B015</b>	Insect Laboratory	1974	No Action
<b>B057</b>	Auxiliary Building	Post-1993	No Action
<b>B059</b>	Hazardous Material Waste Storage	1980s	Demolish and reconstruct at new location
<b>B066</b>	Shed	1980s	No Action
<b>B084</b>	Chemical Storage	1980s	Demolish
<b>B089</b>	<b>Drying Barns</b>	<b>Post 1972</b>	<b>Demolish</b>
<b>B091</b>	Shed next to greenhouse	2000	Demolish
<b>B092</b>	Hoop Houses	Post 1993	Demolish
<b>B093</b>	<b>Drying Barns</b>	<b>Post 1972</b>	<b>Demolish</b>
<b>B094</b>	Oil Storage	2000	No Action





# Project Background

## Historic Significance

- USDA-ARS Tifton Campus eligible for NRHP
  - **Criterion A** in the areas of agriculture and education.
  - **Criterion C** in the area of architecture.
- The complex is similar aesthetically to contributing features of the adjacent NRHP-eligible UGA Tifton Historic District, and as a grouping, contributes to the UGA Tifton Historic District.
  - Many of the core historic-age resources were constructed during a corresponding building boom at UGA during the 1950s and 1960s.
  - 8 historic-age buildings on the USDA-ARS Tifton Campus have been identified as contributing to the UGA Tifton Historic District.
- The proposed improvements would adversely affect the complex's overall integrity of setting and feeling.

Building	Building Purpose	Year Constructed
B001	Laboratories	1962
B002	Service Shop	1962
B003	Headhouse and Greenhouses	1962
B004	CPMRU Insect Rearing Annex	1965
B007	Chemical Storage	1965
B008	Laboratory/Insectary Field Lab	1965
B013	Equipment Storage	1972
B015	Insect Laboratory	1974



# Proposed Laboratory Building



Northeast Birds Eye



View from Northeast



# Physical Impacts:

## Building B001, Laboratories

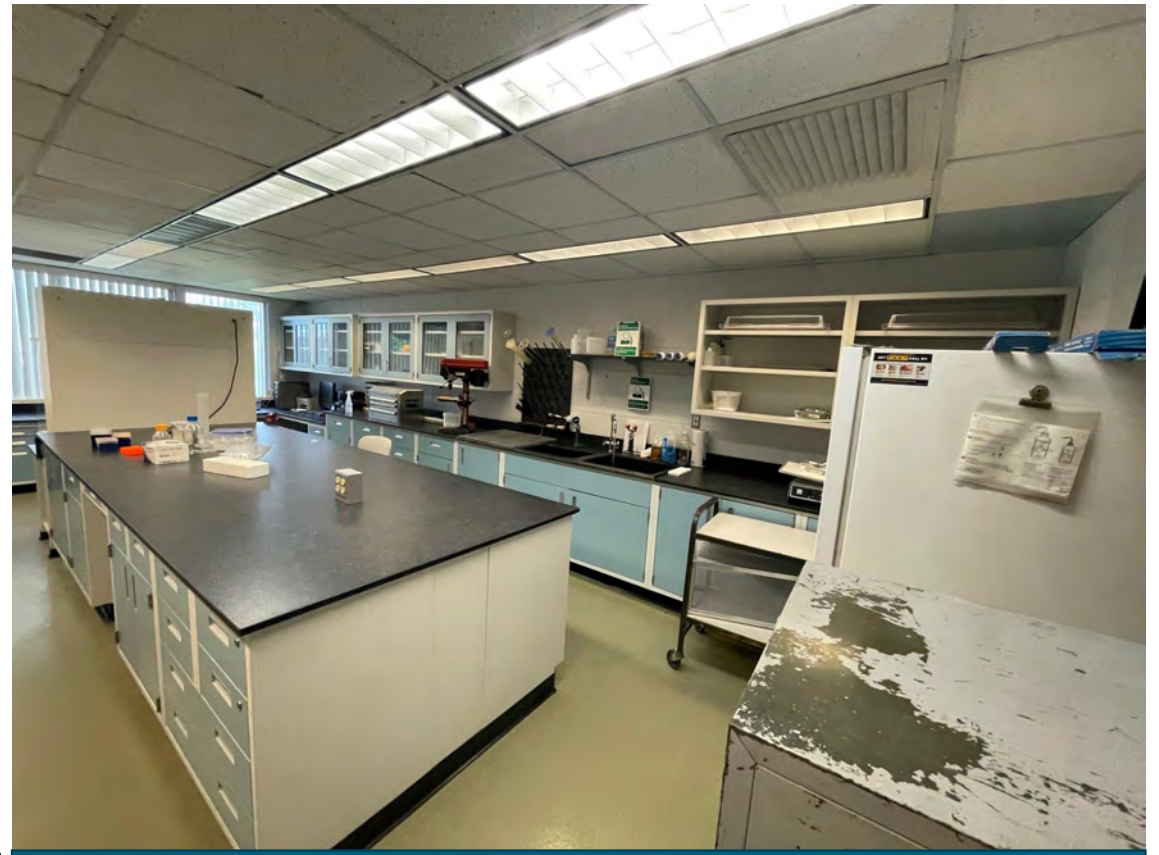
- Constructed in 1962
- Largest laboratory on campus
- Contributing under Criteria A and C
- Renovation proposed







B144 showing wall to be demolished between office space and laboratory

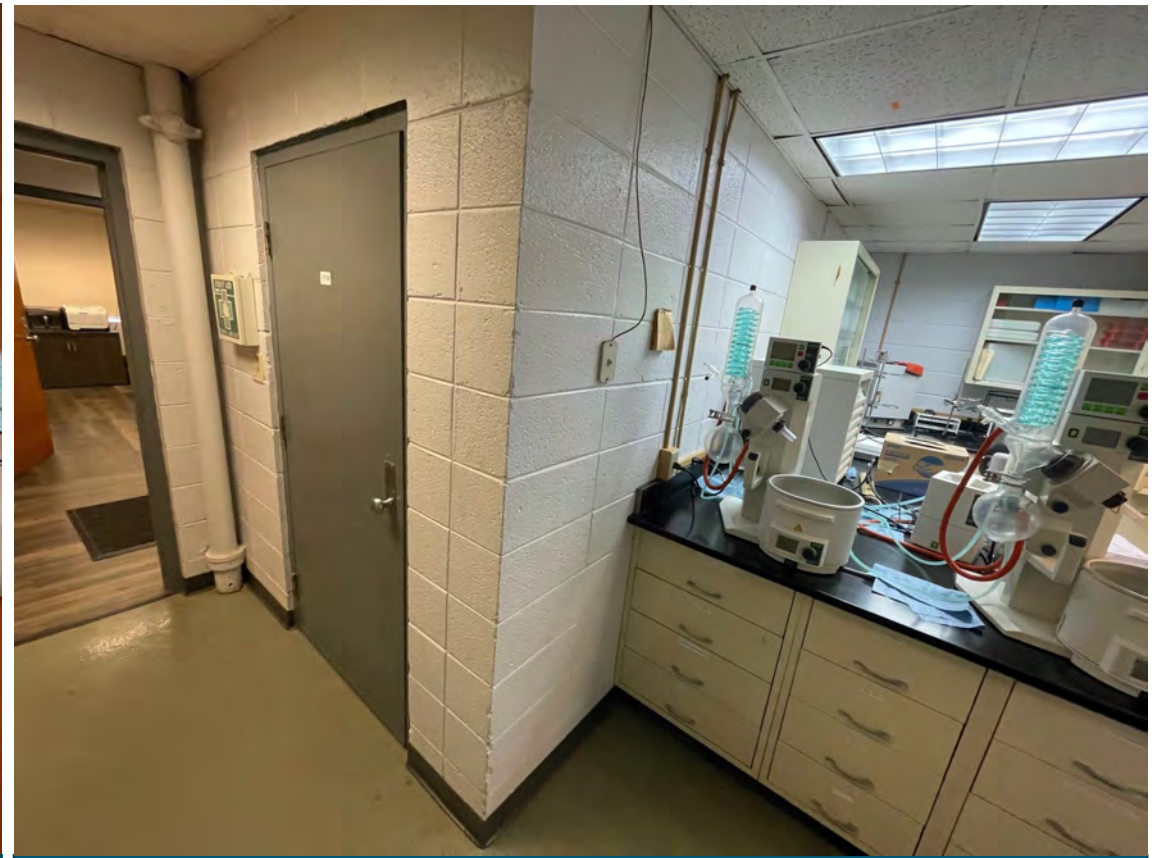


B149 showing wall to be demolished to facilitate expansion of the laboratory space





B151 showing wall proposed for demolition to increase size of laboratory space

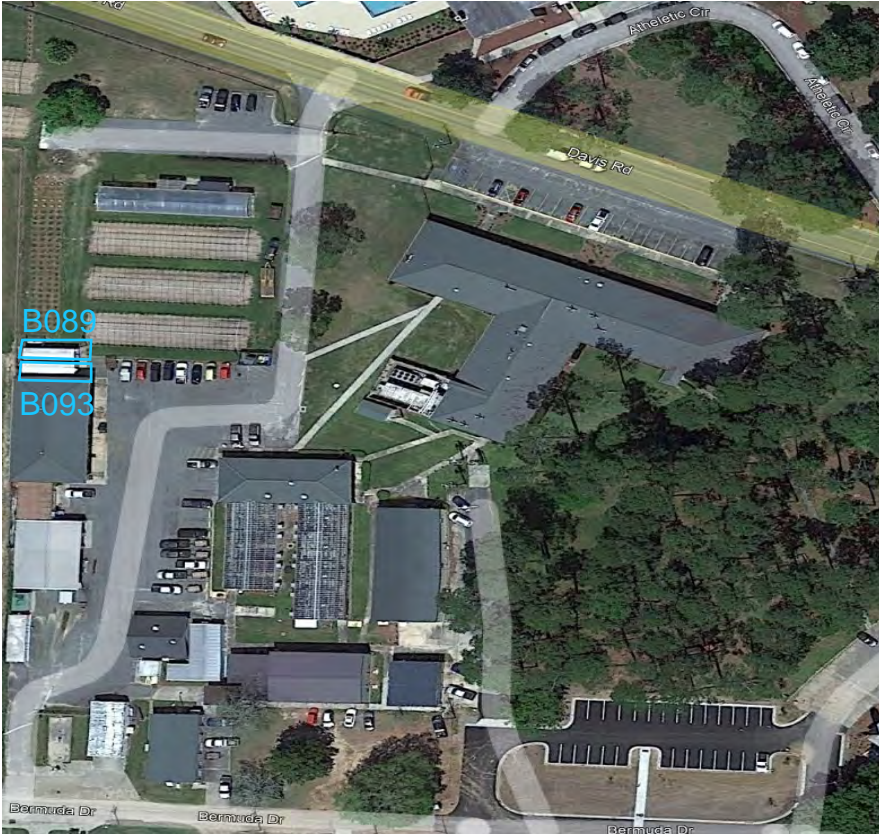


B153 showing proposed expansion area to increase laboratory space



# Physical Impacts:

## Buildings B089 & B093 - Drying Barns





# NRHP Contributing Buildings



B002, Service Shop



B003, Headhouse



B004, CPMRU Insect Rearing Annex



# NRHP Contributing Buildings



B003, Greenhouses



B007, Chemical Storage



B008, Laboratory/Insectary Field Lab

# NRHP Contributing Buildings





# NRHP Eligible UGA Tifton Historic District

## Representative Buildings





# Stipulation Brainstorming

## Meaningful mitigation options:

- Relevant and commensurate with resources' significance
- Public benefit and consider views of the public and community
- Accommodate all parties' needs, including those passionate about property and the USDA-ARS
- Think beyond traditional documentation strategies
  - Consider broader resource and property type related options
  - Offset mitigation that could benefit other resources



Source: UGA Extension; UGA Master Plan

# Proposed Stipulations

- Photographic Permanent Archival Record (PAR)
  - Digital photography of contributing buildings and structures within USDA-ARS Tifton Campus will be prepared
- Development of Interpretative Panel for Installation in New Laboratory Building
  - Example of interpretive panel at construction firm Walbridge in Detroit (right)



# Next Steps – We are seeking your input!

- Your ideas today regarding appropriate mitigation will be considered during Memorandum of Agreement (MOA) development.
- Once distributed, you will have 30 days to comment on the MOA and/or request signatory status.
- Please direct input comments to:

Brandy Harris  
[bmharris@burnsmcd.com](mailto:bmharris@burnsmcd.com)  
Section 106 Lead



Date: June 29, 2022

Re: Meeting Minutes; Virtual Section 106 Consultation Meeting for Laboratory Modernization Project (HP-210910-003), Davis Road, Tifton, Tift County, Georgia

<u>Attendees</u>	<u>Organization</u>
Nicholas Girken	USDA-ARS
Michael Toews	University of Georgia
Scott Messer	University of Georgia
Brandy Harris	Burns & McDonnell
Sara Kent	Burns & McDonnell
William King	Burns & McDonnell
Lydia Costello	Burns & McDonnell
Andrea Farmer	USACE
Shauna Stotler	USACE
Santiago Martinez	Georgia Historic Preservation Division (HPD)

On Friday June 24, 2022, United States Department of Agriculture, Agricultural Research Service (USDA-ARS) and Burns & McDonnell representatives hosted a virtual meeting with Consulting Parties to discuss the Section 106 consultation process for the proposed laboratory modernization project at the Tifton research campus. Consultation between USDA-ARS and the Georgia Historic Preservation Division (HPD), which serves as the State Historic Preservation Office (SHPO), resulted in a determination that the USDA-ARS Tifton Campus is eligible for inclusion in the National Register of Historic Places (NRHP). Though the buildings are not individually NRHP eligible, the complex maintains associations with defined historic contexts and agricultural research endeavors and is similar aesthetically to contributing features of the adjacent NRHP-eligible University of Georgia (UGA) Tifton Historic district. As proposed, the modernization project would adversely affect the NRHP-eligible property.

Meeting participants discussed adverse effects to historic properties from the proposed undertaking and reviewed a draft Memorandum of Agreement (MOA) circulated prior to the meeting. In addition to providing the potential Consulting Parties and agency officials with some background information on the construction, major topics of discussion are outlined below:

- Burns & McDonnell facilitated welcome and introductions and discussed what the USDA-ARS goals are for this project.
- Burns & McDonnell provided a brief overview of Project, including Section 106, major steps, the criteria of adverse effect, and where the current Project is in the overall process.
- Burns & McDonnell summarized that the agencies involved deemed a MOA was appropriate for this undertaking to account for the anticipated adverse effect to the NRHP-eligible USDA-ARS Tifton Campus; the MOA will summarize the list of

measures the USDA-ARS and other responsible parties will undertake as part of the Project to avoid, minimize, or mitigate impacts on historic (NRHP-eligible) resources.

- Burns & McDonnell provided a summary of the district history, described the district's period of significance, and outlined its historic associations under NRHP Criterion A and significance in the area of architecture under NRHP Criterion C.
- Burns & McDonnell led discussion and solicited input from attendees about individual concerns regarding the undertaking and possible mitigation stipulations including preparation of a Photographic Permanent Archival Record (PAR) and development of an interpretive panel for installation in the new Laboratory Building
- Participants provided the following input:
  - Scott Messer, Director of Historic Preservation at UGA agreed with mitigation options and expressed interest in receiving a digital copy of the UGA historic district information and any associated reporting.
  - Mike Toews, Assistant Dean at the UGA Tifton Campus concurred with the proposed stipulations, the Photographic Permanent Archival Record (PAR) and developing an Interpretative Panel for installation in the new Laboratory Building.
  - Santiago Martinez, Environmental Review Historian at the HPD agrees with stipulations proposed but provided some input into the wording and format of the draft MOA document. He requested clarification that the USACE is a concurring party rather than a signatory and emphasizing that USDA-ARS is the lead Federal agency. Further, he wants it specified that in addition to reviewing the content of the interpretive installation, USDA-ARS must submit documentation of its installation via a photograph, etc.
  - Andrea Farmer, Archaeologist for the Savannah District at the USACE concurs with HPD.
- Burns & McDonnell outlined action items, including providing copies of the presentation materials and meeting minutes and circulating the draft MOA for formal comment. Consulting Parties have 30 days from receipt of the MOA to review document.

**MEMORANDUM OF AGREEMENT  
BETWEEN THE UNITED STATES DEPARTMENT OF AGRICULTURE  
AGRICULTURAL RESEARCH SERVICE AND THE GEORGIA STATE HISTORIC  
PRESERVATION OFFICE REGARDING THE PROPOSED USDA-ARS TIFTON  
CAMPUS CONSOLIDATION AND MODERNIZATION PROJECT, TIFTON, TIFT  
COUNTY, GEORGIA**

**WHEREAS**, the United States Department of Agriculture-Agricultural Research Service (USDA-ARS) operates the a laboratory and research facility at the University of Georgia (UGA) Tifton Campus in Tift County, Georgia; and,

**WHEREAS**, the laboratory and research facility comprises a historic district, which USDA-ARS and the Georgia State Historic Preservation Office (SHPO) **agree** is eligible for inclusion in the National Register of Historic Places (NRHP) (Attachment 1: Exhibit 1); and,

**WHEREAS**, the 5.25-acre USDA-ARS Tifton Campus supports the Southeast Watershed Research Unit (SEWRU) and the Crop Genetics and Breeding Research Unit (CGBRU) research facilities; and

**WHEREAS**, the SEWRU, CGBRU, and administrative staff occupy administrative and laboratory buildings on the USDA-ARS Tifton Campus and on the adjacent UGA campus and the USDA-ARS lease with UGA for these buildings is expiring; and

**WHEREAS**, the USDA-ARS is proposing a consolidation and modernization project for the Tifton Campus to provide more laboratory and administrative space on the USDA-ARS Tifton Campus and to reduce the amount of leased space from UGA (undertaking); and

**WHEREAS**, the United States Army Corps of Engineers (USACE) Savannah District is providing oversight and contracting support for the Project and participating in the Section 106 process as a Concurring Party to this document; and

**WHEREAS**, the USDA-ARS is serving as the lead Federal agency under Section 106; and

**WHEREAS**, the proposed undertaking includes demolishing outdated structures, constructing new buildings, renovating the largest laboratory building on the Tifton Campus (B001), and upgrading utility and roadway infrastructure (Attachment 1: Exhibit 2); and

**WHEREAS**, pursuant to 36 CFR 800, regulations implementing Section 106 of the National Historic Preservation Act (NHPA) (54 USC § 306108), *Protection of Historic Properties*, USDA-ARS is required to take into account the effects of Federal undertakings on properties included in, or eligible for inclusion in, the NRHP; and

**WHEREAS**, the USDA-ARS has defined the undertaking's physical area of potential effects (APE) as all areas of proposed ground disturbance and new construction, as well as the footprint of Building 001, which is planned for interior renovations (approximately 2.46 acres),



USDA-ARS  
Memorandum of Agreement  
Tifton Campus Consolidation and Modernization Project

and the non-physical APE as the boundary of the approximately 5.25-acre research campus (Attachment 1: Exhibit 3).

**WHEREAS**, USDA-ARS consulted with SHPO pursuant to 36 CFR Part 800 and determined that the undertaking will have an adverse effect on the NRHP-eligible Tifton Campus, and the determination is included in a letter dated February 14, 2022; and,

**WHEREAS**, USDA-ARS provided the public with the opportunity to comment on the undertaking as part of the National Environmental Policy Act compliance process, including as part of public scoping (August 31, 2021) and via publication of the Notice of Availability for the Environmental Assessment addressing this undertaking (planned for June 24, 2021); and,

**WHEREAS**, in accordance with 36 CFR § 800.6(a)(1), USDA-ARS notified the Advisory Council on Historic Preservation (ACHP) of its adverse effect determination with specified documentation, and the ACHP declined to participate on June 7, 2022; and

**WHEREAS**, USDA-ARS determined the following Federally-recognized Indian tribes may have interest in the undertaking and invited them to participate in Section 106 consultation in letters dated March 29, 2022: Alabama – Quassarte Tribal Town, Coushatta Tribe of Louisiana, Kialegee Tribal Town, Muscogee (Creek) Nation, Poarch Band of Creek Indians, Seminole Nation of Oklahoma, and Thlopthlocco Tribal Town; and,

**WHEREAS**, none of the tribes invited to participate in Section 106 consultation responded to the request to participate in consultation; and,

**WHEREAS**, USDA-ARS in letters dated March 29, 2022, invited additional potential consulting parties to participate in Section 106 consultation including: the Southern Georgia Regional Commission, the Tift County Board of Commissioners, the Tifton Community Development Department, the Tifton Historical Preservation Commission, and the University of Georgia; and,

**WHEREAS**, the University of Georgia accepted the invitation and participated in the consultation regarding the effects of the undertaking on historic properties in a consulting parties meeting held on June 24, 2022; and

**NOW, THEREFORE**, USDA-ARS and SHPO (Signatories) and the USACE (Consulting Party/Invited Signatory) agree that the undertaking will be implemented in accordance with the following stipulations in order to take into account the effect of the undertaking on historic properties.

### **STIPULATIONS**

USDA-ARS (as lead agency under Section 106 of the NHPA) will ensure the following measures are carried out:

## **I. PROFESSIONAL STANDARDS**

USDA-ARS will ensure that all archaeological and historical studies required under the terms of this Memorandum of Agreement (MOA) shall be carried out by, or under the direct supervision of, a professional who, at a minimum, meets the Secretary of the Interior's (SOI's) Professional Qualifications Standards (i.e., SOI qualified; 48 FR 44716, September 29, 1983) in archaeology, history, or architectural history, as appropriate. Archaeological investigations, if needed, shall be performed in accordance with the *Georgia Standards and Guidelines for Archaeological Investigations* (Revised 2019).

## **II. TREATMENT MEASURES**

### **A. Ongoing Coordination Regarding Archaeological Resources**

Based on the current demolition plans, USDA-ARS and the SHPO agree that the undertaking is not likely to affect archaeological resources in the physical APE (Attachment 1: Exhibit 2). If final plans for the demolition require impacts outside of the current undertaking footprint, USDA-ARS will assess the potential for intact archaeological deposits to exist in those areas. The assessment would be conducted by an SOI-qualified archaeologist who would prepare written documentation, including survey/monitoring recommendations, if justified, for review by SHPO and other interested parties. If deemed warranted through the consultation, USDA-ARS will ensure that any archaeological survey and/or monitoring shall be performed in accordance with the professional standards in Stipulation I.

### **B. Photographic Permanent Archival Record (PAR)**

The USDA-ARS or its consultant will prepare Archival Photographs Recordation/Permanent Archival Record (PAR) for the Tifton Campus.

- a. Prior to project implementation, an SOI-qualified architectural historian will document the resource via digital photography of contributing buildings and structures within the USDA-ARS Tifton Campus. The photographs will include exterior views of all buildings, interior views of areas subject to rehabilitation in the main laboratory building (B001), and setting views of the overall complex.
- b. The photographer shall comply with the minimum level standards necessary for document retention at SHPO pursuant to the *Guidelines for Establishing a Photographic Permanent Archival Record* (Attachment 2). A draft copy of the PAR will be provided to SHPO and Consulting Parties for a 30-day review and comment period. USDA-ARS or its assignee, will respond to SHPO comments regarding the draft PAR within 30-days of receipt. After the draft has been reviewed, a final archival copy of the PAR will be provided to SHPO and to the University of Georgia at Tifton Library.

**C. Development of Interpretive Panel for Installation in New Laboratory Building**

As part of design efforts for the proposed three-story laboratory building to be constructed on the campus, USDA-ARS or its consultant will develop an interpretive wall panel for installation in the entry area of the new building. The panel will contain historical information about the Tifton Campus and its significance, as well as photographs and other illustrations as relevant. The content of the panel, including its size and positioning, will be provided in draft form to the SHPO and Consulting Parties. Their input will be taken into account prior to fabrication and installation of the panel. The panel will be installed within six months of completion of the new laboratory building. The USDA-ARS will submit documentation of its installation to SHPO, including photographs.

**III. INITIATION OF DEMOLITION AND CONSTRUCTION ACTIVITIES**

USDA-ARS may proceed with demolition and construction actions for this undertaking upon approval of the PAR content by SHPO. USDA-ARS will ensure that the remaining components of Stipulations I and II are fulfilled before the expiration of the document's duration period as discussed in Stipulation IX.

**IV. POST-REVIEW DISCOVERIES**

If human remains or properties are discovered during demolition that may be historically significant or unanticipated effects on historic properties are identified, USDA-ARS shall implement the discovery plan included as Attachment 3 to this MOA.

**V. COMMUNICATIONS**

Electronic mail (e-mail) may serve as the official correspondence method for all communications regarding this Agreement and its provisions. See Attachment 3, Section IV, for a list of contacts and email addresses. Contact information in Attachment 3 may be updated as needed without an amendment to this Agreement. It is the responsibility of each party to the Agreement to immediately inform the USDA-ARS of any change in name, address, email address, or phone number of any point-of-contact. The USDA-ARS shall forward this information to all Signatories and Consulting Parties by email.

**VI. MONITORING AND REPORTING**

Every year, within 60 days of the date of execution of the MOA, USDA-ARS, shall provide to all Signatories a written report regarding the actions taken to fulfill the terms of the agreement, and shall file a copy with the ACHP per 36 CFR § 800.6(b)(iv). Such report shall include any scheduling changes proposed, any problems encountered, and any disputes and objections



received in USDA-ARS's efforts to carry out the terms of this MOA. Such reporting shall cease when the terms of the MOA have been fulfilled or upon agreement of the Signatories.

## **VII. DISPUTE RESOLUTION**

Should any Signatory to this MOA object at any time to any actions proposed or to the methods the terms of the MOA are implemented, USDA-ARS shall consult with such party to resolve the objection. If USDA-ARS determines that such objection cannot be resolved, USDA-ARS will:

- A. Forward all documentation relevant to the dispute, including USDA-ARS's proposed resolution, to the ACHP. The ACHP shall provide USDA-ARS with its advice on the resolution of the objection within 30 days of receiving adequate documentation. Prior to reaching a final decision on the dispute, USDA-ARS shall prepare a written response that takes into account any timely advice or comments regarding the dispute received from the ACHP or other Signatories and provide them with a copy of the written response. USDA-ARS will then proceed with its final decision.
- B. If the ACHP does not provide its advice regarding the dispute within 30 days of receiving the information from USDA-ARS, USDA-ARS may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, USDA-ARS shall prepare a written response that takes into account any timely comments regarding the dispute received from the Signatories to the MOA and provide them and the ACHP with a copy of the written response.
- C. USDA-ARS's responsibility to carry out all other actions subject to the terms of the MOA that are not the subject of the dispute remain unchanged.

## **VIII. AMENDMENTS**

This MOA may be amended when such an amendment is agreed to in writing by all Signatories. The amendment will be effective on the date a copy signed by all of the Signatories is filed with the ACHP.

## **IX. ANTI-DEFICIENCY ACT**

The USDA-ARS's obligations under this Agreement are subject to the availability of appropriated funds, and the stipulations of this Agreement are subject to the provisions of the Anti-Deficiency Act. The USDA-ARS shall make reasonable and good faith efforts to secure the necessary funds to implement this Agreement in its entirety. If compliance with the Anti-Deficiency Act alters or impairs the USDA-ARS's ability to implement the stipulations of this agreement, the USDA-ARS shall consult in accordance with the amendment and termination procedures found at Stipulations VII and VIII of this Agreement.

## **X. TERMINATION**

If any Signatory to this MOA determines that its terms will not or cannot be carried out, that Signatory will immediately consult with the other Signatories to develop an amendment per Stipulation VII above. If within 30 days (or another period agreed to by all Signatories) an amendment cannot be reached, any Signatory may terminate the MOA upon written notification to the other Signatories.

Once the MOA is terminated, and prior to work continuing associated with the undertaking, USDA-ARS must either (a) execute another MOA pursuant to 36 CFR § 800.6 or (b) request, consider, and respond to the comments of the ACHP under 36 CFR § 800.7. USDA-ARS will notify the Signatories as to the course of action it will pursue.

## **XI. EFFECTIVE DATE AND DURATION**

This MOA shall be effective on the date the last Signatory has affixed their signature. The MOA will expire if its terms are not carried out within five years from the date of its execution. Prior to such time, the Signatories may consult to reconsider the terms of the MOA and amend it in accordance with Stipulation VII above.

## **XII. GENERAL PROVISIONS**

- A. Each Signatory will manage and complete their own activities and utilize their own resources, including the expenditure of their own funds, in pursuing these objectives. Each Signatory will carry out its separate activities in a coordinated and mutually beneficial manner.
- B. Any transfer of funds from one Signatory to another shall be done via a separate instrument as appropriate.

**EXECUTION** of this MOA by the USDA-ARS, SHPO, and USACE and implementation of its terms evidence that USDA-ARS has taken into account the effects of this undertaking on historic properties and afforded the ACHP an opportunity to comment.

USDA-ARS  
Memorandum of Agreement  
Tifton Campus Consolidation and Modernization Project

**SIGNATORY:**

**UNITED STATES DEPARTMENT OF AGRICULTURE  
AGRICULTURAL RESEARCH SERVICE:**

-----

**By:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Title:** \_\_\_\_\_

DRAFT



USDA-ARS  
Memorandum of Agreement  
Tifton Campus Consolidation and Modernization Project

**SIGNATORY:**

**GEORGIA STATE HISTORIC PRESERVATION OFFICE:**

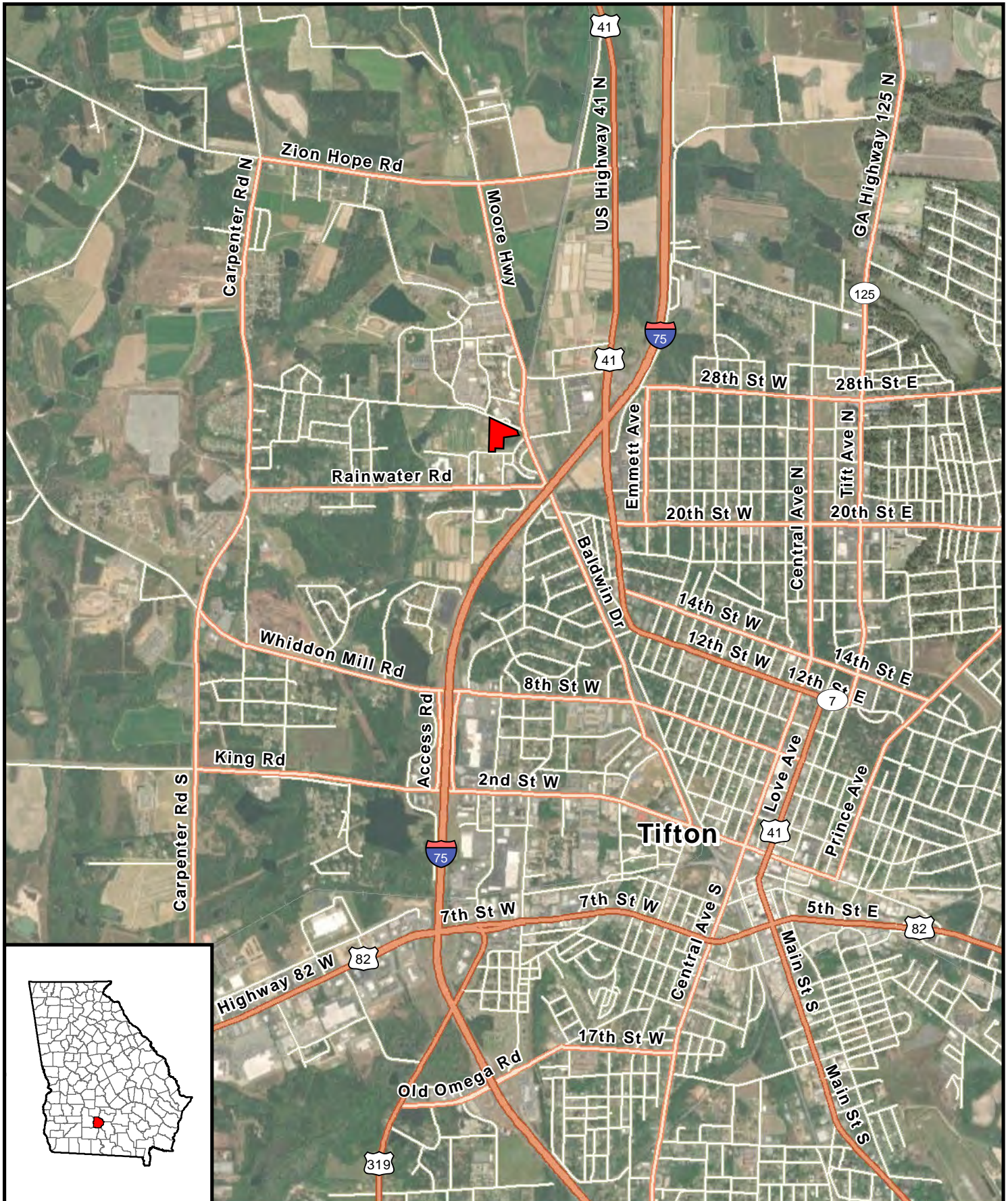
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**By:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Title:** \_\_\_\_\_

DRAFT

## **Attachment 1 – Figures**



 Project Boundary

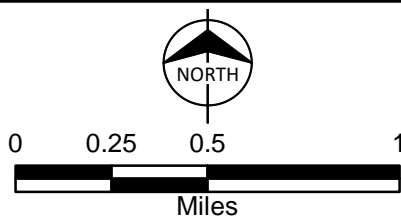
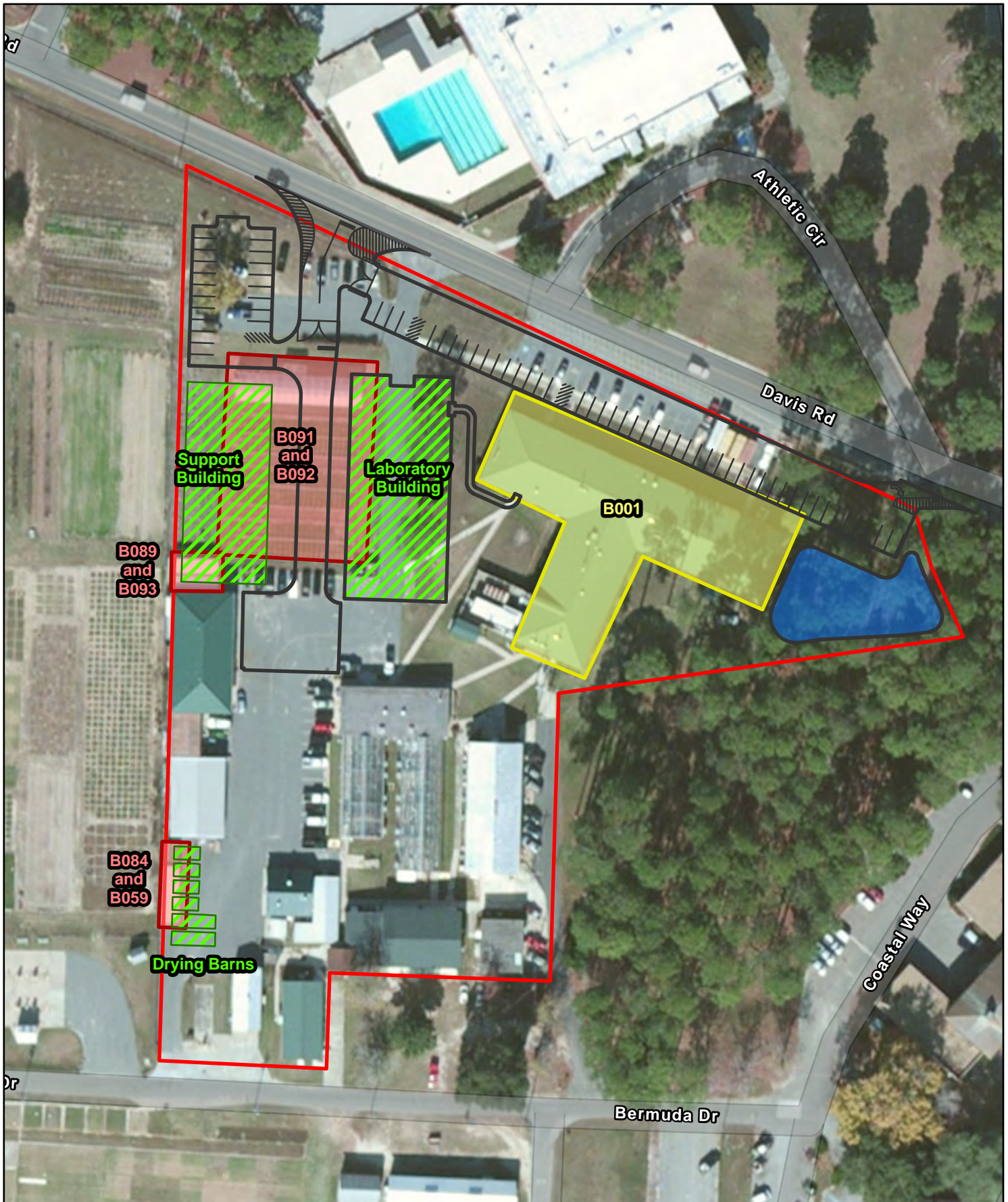


Exhibit 1  
Project Location  
USDA-ARS  
Laboratory Modernization  
Tift County, Georgia





- New Pavement
- Site Boundary
- Proposed Stormwater Pond
- Demolish Building
- Renovate Building
- New Construction

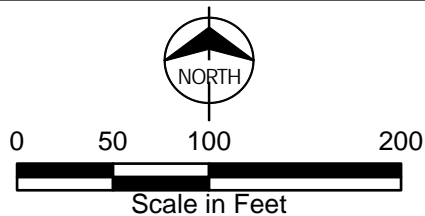


Exhibit 2  
Proposed Undertaking  
Site Plan Map  
USDA-ARS Laboratory  
Modernization Project  
Tift County, Georgia





- Physical APE
- Non-Physical APE

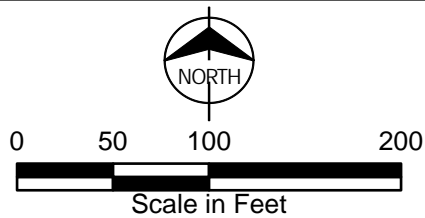


Exhibit 3  
Area of Potential Effect  
USDA-ARS Laboratory  
Modernization Project  
Tift County, Georgia

## **Attachment 2- PAR Standards**



# **Guidelines for Establishing a Photographic Permanent Archival Record**

Revised  
February 2020

## **INTRODUCTION**

Section 106 of the National Historic Preservation Act of 1966, as amended, requires that any undertaking that is federally funded, licensed or permitted take into account the effect it will have on resources listed or eligible for listing on the National Register of Historic Places (NRHP). If any undertaking has an adverse effect on a listed or eligible resource, alternatives that avoid or minimize the effect are considered and if these are not feasible, mitigation to resolve that effect is proposed. The following guidelines should be used for completion of mitigation stipulations, specifically photographic mitigation, as set forth in a Memorandum of Agreement (MOA) between the federal agency and the Georgia Historic Preservation Division (HPD)/State Historic Preservation Officer (SHPO).

The aspects of the project that should be photo-documented for mitigation for a given undertaking is determined through consultation with the parties involved and under the guidance of the SHPO. There are several types of photo-documentation including 35 mm, medium format, large format photography, and Historic American Building Survey (HABS) and Historic American Engineering Record (HAER). HABS/HAER documentation is the national historical architectural and engineering documentation program of the National Park Service. The documentation is retained by the Library of Congress and consists of measured drawings, photographs, and written information. This level of documentation is the national standard.

In 2001, the National Park Service requested that only National Historic Landmarks, properties eligible for the NRHP at the national level of significance, and individually eligible properties significant at the State and Local levels be documented to HABS/HAER standards. In response to this request, the SHPO determined that most resources at the State or Local level of significance will be documented to the standards outlined in the following guidelines rather than to HABS/HAER standards, unless a resource merits a higher level of documentation. Eligible bridges are one exception to this rule and shall be documented to HAER standards. For projects where HABS/HAER is not required or warranted, the SHPO has determined that digital photography is the preferred medium for photo-documentation; therefore, the following guidelines describe the minimum extent and level of documentation required for a Permanent Archival Record (PAR) retained by the State of Georgia.

## **PURPOSE AND VALUE**

Photographic mitigation shall provide a visual record of a resource determined eligible for the NRHP that will be physically impacted by project implementation (i.e. taking of a resource, taking of part of a resource, or altering the setting of a resource). Photo-documentation of eligible resources is the “last resort” mitigation measure and should be done in conjunction with other mitigation components.

## **EXTENT AND LEVEL**

The extent of documentation refers to the content considerations determined necessary by the circumstances of a given project; the level of documentation refers to the technical considerations determined necessary by the circumstances of a given project. The extent and level of documentation are almost always dependent upon the circumstances of a project.

To determine the extent and level of documentation necessary for a project, the following two factors must be taken into account: the features which contribute to the eligibility of a resource and then of those features, which ones will be impacted by the proposed project. For example, if a resource will be demolished during implementation of the project, interior photographs of the resource will be required as well as exterior photographs; on the other hand, if only a small portion of the front yard of a resource will be impacted by the proposed project and if no other contributing features are located within that area, then the level of documentation may be limited to exterior elevation and setting photographs of the resource.

## **CONTENT**

The following represents the minimum level of supporting documentation that must accompany the digital photographs in the mitigation of a historic resource. This documentation is necessary for establishing a complete PAR of the resource:

- An introductory page providing the appropriate project number. This page should also include a brief description (no more than 3 or 4 sentences) of the resource (Ex: circa 1910 Hall-and-parlor house type) along with an explanation of why it is significant, utilizing the NRHP criteria and areas of significance.
- A page providing information on the geographic location of the resource. This information should consist of the name of the property (Ex: Smith House), street address, city, county, and UTM coordinates. Geographic information should be separate from text paragraphs and more general location information such as crossroad references should be included.
- A map documenting the resource's location in relation to its surrounding area. County maps should be used to provide this information. Additionally, a thumbnail state map showing the general location and a more detailed county or city map pinpointing the location should be included.
- A sketch map/site plan illustrating the resource(s) and its immediate surroundings. Plat books, insurance maps, bird's eye views, district highway maps, or hand-drawn maps are acceptable. Sketch maps need not be drawn to a precise scale. A number and vantage point of each accompanying photograph should be labeled on the sketch map.
- A photo log providing the following information:
  1. Name of resource
  2. Street address where property is located
  3. City and County where property is located
  4. Name of photographer
  5. Date of photographs (date photographs were taken, not processed)
  6. Location of digital image files (this will always be the SHPO)
  7. Photograph Number
  8. Description of view indicating the direction of the camera (Ex: View of façade, facing west)



- In cases where a resource has been shown to be exceptionally significant based on its historical importance or for possessing a high degree of architectural integrity, supplementary information may be required. This information should convey the significance of the resource through a detailed architectural description and/or a short summary of its historical importance.
- Photograph proof sheets of all digital photographs with six (6) photographs per page and project identification information in the header.
- All of the documentation must be printed on archival-stable paper, including all attachments, appendices, plans, photocopies, and other supplemental material.
- A PDF of all information noted above (narrative, photo log, and photo proof sheets, etc.).

### **TECHNICAL CONSIDERATIONS**

For digital photographic documentation, the minimum required is as follows:

- Use of a modern digital SLR camera.
- Use of perspective controlled (pc) lens is recommended.
- Take at least three (3) exposures of each view or angle and pick the best exposure.
- In order to capture details and allow for greater enlargement of the images, the photographs should be submitted in three formats:
  - RAW format (DNG preferred)
  - TIF format (minimum 360 ppi, 8-bit files – **16 bit files NOT accepted**)
  - JPEG format (minimum 1024x1024 and 360 ppi)
- Images should be saved to a media that is designed for long-term (over 100 years) storage of sensitive data, video, or music files. The media should be archivally labeled using a felt type and solvent free pen with no adhesive details.

### **PRODUCTION/PRESENTATION**

The following represents the minimum level of standards necessary for document retention at the SHPO.

- All paper and media included should be archivally stable. Reports should use headings to separate topics, include an index if applicable, and when and who prepared the report.
- All documentation shall be loose with no pins, paper clips, staples, rubber bands, or adhesive labels. If an archivally stable folder is available, it should have sides and a flap over the top to keep the documentation secure. Each resource recorded should be in its own separate folder with all supporting documentation.

- All documentation should be the size of an 8 1/2 x 11 sheet of paper. If large plan sheets must be inserted, consider photographing or scanning the plans in order to provide for a smaller copy.
- All labeling should be done with archival and no ballpoint pen ink or felt-tip pens should be used on photographs, negatives, or paper.

### **MISCELLANEOUS**

- When mitigating larger historic resources such as agricultural properties, aerial photography of the landscape should be included as part of the PAR.
- When mitigating certain types of structures, SHPO may request that the engineering or construction drawings/blueprints for the structure accompany the required photo-documentation.
- In most cases, at least two sets of final documents must be prepared – one for deposit in the archives of SHPO and a second in a publicly accessible archive near the historic site recorded. The MOA will specify the second local repository for the documentation, usually a regional or branch library or historical society in the county of the proposed undertaking. Local repositories should be sent a digital and hardcopy of everything in the PAR.

**Attachment 3 - UDP**



## **ATTACHMENT 3**

### **UNANTICIPATED DISCOVERIES PLAN FOR CULTURAL RESOURCES AND HUMAN REMAINS**

#### **I. INTRODUCTION AND DEFINITIONS**

Through its Consolidation and Modernization Project (Project), the United States Department of Agriculture-Agricultural Research Service (USDA-ARS) intends to improve, remove, and/or construct new facilities to support its ongoing Southeast Watershed Research Unit (SEWRU) and Crop Genetics and Breeding Research Unit (CGBRU) missions at its Tifton Campus in Tift County, Georgia.

This document describes the procedures to follow in the event a post-review unanticipated discovery is made during Project activities. An unanticipated discovery is defined as a cultural resource, human remains, or funerary objects that are encountered during Project activities where it was not anticipated. Cultural resources may include historic or prehistoric artifacts, such as arrowheads, pottery, glass, or metal 50 years old or older or cultural features such wells, buildings, or concentrations of burned rocks, charcoal, shell, or animal bones 50 years old or older. Funerary objects are items of human manufacture intentionally placed with human remains at the time of burial or after interment and may include gravestones, a burial vessel such as a coffin, or ceremonial offerings.

The stipulations of the unanticipated discoveries plan as set forth below are in accordance with Section 106 of the National Historic Preservation Act (16 USC 470f), the Georgia Abandoned Cemeteries and Burial Ground Act (Official Code of Georgia Annotated [OCGA] 36-72), Georgia Dead Bodies Law (OCGA 31-21-6), the Georgia Protection of American Indian Human Remains and Burial Objects Act (OCGA 44-12-260 through 264), and the Native American Graves Repatriation Act (NAGPRA, 25 U.S.C. 3001), as required.

#### **II. PROCEDURES FOR THE DISCOVERY OF CULTURAL RESOURCES**

If any member of the Project work force believes that a cultural resource is encountered the following plan will be implemented:

1. All work within immediate area of the discovery will immediately stop and the **Project Supervisor** will be notified. The area of work stoppage will be adequate to provide for the security, protection, and integrity of the discovery.
2. The **Project Supervisor** will take appropriate steps to protect the discovery. The discovery will be carefully covered and secured for protection from the elements or unauthorized individuals. The area of the discovery will be fenced off and flagged as an exclusion zone. The **Project Supervisor** will notify the USDA-ARS Representative within 24 hours of the discovery.

3. The USDA-ARS shall notify the Georgia Historic Preservation Division (HPD), Tribes, and other consulting parties as appropriate.
4. The USDA-ARS Representative will arrange for the discovery to be evaluated by a Secretary of the Interior-qualified archaeologist. The archaeologist will evaluate the remains and provide recommendations for how to manage the resource under Section 106 of the National Historic Preservation Act.
5. If the discovery is determined to have potential for National Register of Historic Places (NRHP) eligibility, the archaeologist and USDA-ARS will also consult with HPD, Tribes, and other consulting parties, as appropriate, on treatment measure(s) to avoid, minimize, or otherwise mitigate further impacts. Work in the immediate area will not resume until treatment of the discovery has been completed.
6. The archaeologist and USDA-ARS will implement the appropriate treatment measure(s) and provide a report on its methods and results as required. The investigation and technical report will be performed in compliance with the Secretary of the Interior's *Standards and Guidelines for Archaeological Documentation* (48 CFR 44734-44737) and the current version of the Georgia Council of Professional Archaeologists *Georgia Standards for Archaeological Investigations*.

### III. PROCEDURES FOR THE DISCOVERY OF HUMAN REMAINS

If any member of the Project work force believes that human remains, burial sites, or funerary objects are encountered the following plan will be implemented:

1. Any human remains or funerary objects discovered during demolition will at all times be treated with dignity and respect. Do not call 911 or speak with the media.
2. All work within immediate area of the discovery will immediately stop and the **Project Supervisor** will be notified. The area of work stoppage will be adequate to provide for the security, protection, and integrity of the remains.
3. The **Project Supervisor** will take appropriate steps to protect the remains. The **Project Supervisor** will immediately notify the USDA-ARS Representative. To maintain confidentiality, the USDA-ARS will identify authorized and essential personnel permitted on site in the area of the discovery. The discovery will be carefully covered with a tarp and secured for protection from the elements or unauthorized individuals. The area of the discovery will be fenced off and flagged as an exclusion zone. Photographs, video, or other means of visual documentation are restricted. Every effort will be made to avoid the displacement and collection of human remains and associated funerary objects from the field.

4. The USDA-ARS Representative will immediately notify the Tift County Sheriff's Office as required under the law. The Sheriff will determine the appropriate course of action in consultation with USDA-ARS, HPD, Office of the State Archaeologist, descendants, or tribal representatives, as appropriate. Work in the immediate area will not resume until treatment of the discovery has been completed.

#### IV. CONTACTS

##### Project Supervisor

Name  
Title  
Number  
Email

##### Project Supervisor Alternate

Name  
Title  
Number  
Email

##### USDA-ARS Representative

Name  
Title  
Number  
Email

##### USDA-ARS Representative Alternate

Name  
Title  
Number  
Email

##### Georgia HPD Representative

Name  
Title  
Number  
Email

##### Georgia HPD Representative Alternate

Name  
Title  
Number  
Email



USDA-ARS  
DRAFT Unanticipated Discoveries Plan  
Tifton Laboratory Modernization Project

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