

REVISED FINDING OF NO SIGNIFICANT IMPACT
TENNESSEE VALLEY AUTHORITY

SALE, EASEMENT OR LEASE OF THE KNOXVILLE OFFICE COMPLEX (KOC) AND THE
SUMMER PLACE OFFICE AND GARAGE COMPLEX (SPC) AND CONSOLIDATION OF THE
TVA KNOXVILLE OFFICES - PROPOSED EXTERIOR MODIFICATIONS
KNOXVILLE, TENNESSEE

Background

In 2016, Tennessee Valley Authority (TVA) initially proposed to sell the KOC and SPC and construct a new administrative headquarters (HQ) for the Knoxville area and prepared a draft Environmental Assessment (EA). After the draft EA was released, TVA re-evaluated the feasibility and costs of each of the Alternatives and determined that selling the KOC and SPC and constructing a new HQ would be more costly and complex than originally assumed, and that consolidating employees in the KOC West Tower but leasing or conveying easements for the East Tower and SPC would be less costly than originally thought. Ultimately, as a result of this re-evaluation, TVA decided to reconsider the reuse, through consolidation and easements or leases, of the KOC and SPC. TVA completed the *Sale, Easement, or Lease of the Knoxville Office Complex and the Summer Place and Garage Complex and Consolidation of the TVA Knoxville Offices Environmental Assessment*. The EA analyzed four action alternatives (Alternatives B1, B2, C and D) in addition to a no action alternative (Alternative A). Alternatives B1, B2, and C assumed sale of the KOC and SPC sites and a variation of reuse of the KOC and SPC and/or partial or full demolition of each complex. Alternative D - retain ownership of KOC (including the Fritts lot) and SPC sites, continue TVA HQ operations in the West Tower, and convey easements or leases for East Tower and the SPC – was identified as TVA’s preferred alternative. Based on the findings of the EA, TVA concluded that Alternative D would not result in significant adverse impacts and issued a finding of no significant impact (FONSI).

The following mitigation measure was identified in the 2017 FONSI:

- As a condition of the easement or lease agreement under Alternative D, TVA will require the tenant that occupies the East Tower of the KOC to inform TVA of any proposed changes to the lobby or Plaza floor. TVA will consult with State Historic Preservation Officer (SHPO) and determine appropriate mitigation for any adverse effects.

In 2019, TVA received a request from a potential occupant of the East Tower of the KOC complex, to grant a term easement over the Fritts lot, instead of TVA retaining full ownership and use of Fritts lot. Additionally, the potential occupant of the East Tower requested to construct a service elevator and walking bridge that would span from the Plaza Level of the KOC East tower over the alleyway and down to the Fritts lot. The additional service elevator and bridge would provide access for shipping and receiving, as the new occupants would be prohibited from accessing TVA’s West Tower loading dock or freight elevators on the concourse level, with very limited exception, due to TVA security requirements. As a result, TVA completed the *Proposed Modification of Approved Actions to Include Issuing an Easement for the Use of the Fritts Parking Lot - Memorandum to File*. Pursuant to the mitigation measure identified in the 2017 analysis and Section 106 of the National Historic Preservation Act (NHPA), TVA consulted with the Tennessee (TN) SHPO and federally recognized tribes regarding the proposed changes to management of the Fritts lot and the construction of the service elevator and

walkway. On January 23, 2019, the TN SHPO concurred with TVA's findings that granting of an easement and subsequent construction of the service elevator and walking bridge would have no adverse effect on archaeological resources nor diminish the integrity of the NRHP-eligible KOC East Tower. TVA concluded that the proposed modifications to the original EA would not result in significant adverse impacts and issued a revised FONSI.

Current Proposal

TVA now proposes to renovate the exterior of the East and West Towers and modify the Plaza of the KOC with the intent to improve the aesthetics of the KOC and Plaza, clearly brand the West Tower as the TVA HQ building and distinguish it from the East Tower. TVA now proposes the following activities:

West Tower:

- Clean and repair the concrete exterior
- Apply stain (similar neutral color) to the concrete
- Repair and/or replacement of windows

East Tower and West Tower:

- Install a TVA sign, on the ground level, in front of the West tower, and Tenant sign or address identification in front of the East tower. Signs may be installed at the north and south sides of each building on ground level.
- The area along Wall Avenue and Summit Hill Drive that receives demolition and infrastructural enhancements will receive new concrete sidewalk.
- Renovate the interior of the plaza level of the East Tower and West Tower retaining character-defining features including the open elevator lobby (TVA would only be completing these renovations to the West Tower; any renovations to the East Tower Plaza interior or other floors will be proposed, reviewed by TVA, and approved prior to completion by the tenants of the building. Should any future renovations proposed by the tenant have the potential to affect the character-defining features of the building, TVA will review those plans in the future.)

Upgrades to the Plaza include:

- Removal of the South Concourse entry ramp and associated site walls
- Removal of the South Main Plaza Entry Stair from Market Square, and associated fountain, retaining walls, railings, ramps and vegetation
- Removal of the existing Plaza topping surface & wearing surface, deck drain fixtures, planters and associated irrigation and electrical lines
- Removal of the existing waterproofing membrane
- Removal of the skylight in the center of the Plaza
- Installation of stairs and Americans with Disabilities Act (ADA)-compliant entrances and ramps to the towers and Plaza from Wall Avenue and Summit Hill Drive
- Installation of removable bollards on Wall Avenue and Summit Hill Drive (designed to restrict vehicular traffic and reduce impediments for pedestrian access to the exterior Plaza from Market Square)
- Addition of new steps, decorative granite fountain highlighting TVA dams throughout the valley, seating, raised planters, shade structures, embedded map feature, and improved site lighting
- Construction of low-profile protective walls on the north side of the West Tower

- Planting of native foliage throughout the grounds
- Installation of bollards at the entrances to the Plaza from Wall Avenue and W. Summit Hill Drive and on the corner of Walnut Street and W. Summit Hill Drive to enhance security
- Renovation to existing canopy on the South side of the West Tower.

Impact Assessment

TVA NEPA staff conducted a review of the previous 2017 EA, the 2019 Memorandum to File and the associated FONSI for each document. Alternatives B1, B2, and C of the 2017 EA assumed that the potential new developer/owner would either reuse the KOC or demolish and redevelop the KOC for the highest and best use, consistent with current zoning. As part of the 2017 EA, TVA also identified potential construction laydown areas that a developer may need for storage of construction vehicles, equipment and materials. A summary and comparison of each of the alternatives (B1, B2 and C) by resource area, can be found in Table 2-1 of the 2017 EA. TVA has reviewed each of the above alternatives (B1, B2 and C) and determined that implementation of any of the alternatives from the 2017 EA would not result in a significant impact to the environment. Therefore, TVA NEPA staff has determined that with the exception of cultural resources, the potential environmental impacts of the proposed modifications to the KOC East and West Towers and Plaza level would be less than those evaluated in the 2017 EA and thus bound by the previous analysis (full demolition). Per the mitigation measures identified in the 2017 and 2019 FONSI, demolition, construction or renovation activities proposed for the KOC would require further consultation with the Tennessee State Historic Preservation Office (SHPO) and other consulting parties to ensure the historic value and architectural integrity of the KOC is maintained. Additional analysis regarding cultural resources and the proposed modifications and upgrades associated with the KOC and Plaza are addressed below. Environmental issues related to air quality, land use, noise, socioeconomics and environmental justice, solid and hazardous waste, surface water, transportation, visual resources, terrestrial wildlife, threatened and endangered species, and utilities were adequately addressed in the 2017 EA and do not require additional analysis.

Cultural Resources

A summary of cultural consultations over the life of the project prior to the current consultation discussed below is summarized in Table 1.

Table 1. Summary of Consultations on the KOC since 2015

Date	Subject of Consultation
June 2017	Addition of GPS Antenna on the roof of KOC
July/August 2017	Summer Place Complex/KOC East Tower Easement and Renovation
April/May 2018	East Tower Secondary Egress
August 2019	East Tower Window Cleaning and In-kind Repair/Replacement
February 2019	East Tower Loading Dock and Fritts Lot
April 2019	West Tower Emergency Generator

All consultations listed in **Table 1** resulted in SHPO concurrence of no adverse effects.

Architectural

In April 2020, TVA initiated consultation on preliminary plans for the redevelopment of the Plaza and the exterior renovations of the KOC (the subject of this FONSI). TVA determined that the area of potential effects (APE) for the project consisted of the exterior Plaza renovations (project area or footprint) and any historic properties adjacent to the KOC and within view of the

proposed Plaza renovations. The APE accounted for both direct and indirect visual effects. TVA proposed to survey, assess for NRHP-eligibility, and assess effect of the project upon all of the historic architectural resources within both the viewshed of the exterior Plaza and a 0.5-mile radius.

TVA contracted with Cultural Resource Analysts, Inc. (CRA) to complete the historic architectural resource survey in February and March of 2021 (Heavrin 2021). In their report, titled, *Historic Architectural Resources Survey for the Proposed Plaza Renovations at the Knoxville Office Complex, Knox County, Tennessee*, CRA recorded five resources, evaluated the eligibility of each resource for listing in the National Register of Historic Places (NRHP), and assessed potential effects of the proposed project on historic properties. The five recorded resources include the NRHP-eligible KOC (including the adjacent Fritts Lot), Immaculate Conception Catholic Church (KN-1080), the NRHP-listed Market Square Commercial Historic District, and two previously undocumented commercial buildings located along Gay Street and southeast of the KOC. CRA recommends that the KOC remains eligible for listing in the NRHP under Criterion A and under Criterion Consideration G and that the Market Square Commercial Historic District remains eligible for listing in the NRHP under Criteria A and C. Additionally, CRA recommends that Immaculate Conception Church remains potentially eligible and that the two newly-recorded resources are not eligible. Further, CRA recommends that the proposed project would result in a finding of no adverse effect. TVA reviewed the report and agrees with CRA's recommendations. Thus, TVA finds that the exterior renovations to the KOC and Plaza would result in no adverse effects to historic properties.

Archaeology

Preliminary project plans indicated ground disturbance within an anomaly previously recorded and consulted on within the boundaries of archaeological Site 40KN357. In the 2020 consultation, TVA recommended a Phase II investigation of that area for archaeological resources. However, by early 2021, the plans for the Plaza redesign were further developed, and ground disturbance within the area that warranted a Phase II were no longer planned. Thus, TVA found that any work associated with the KOC exterior or Plaza development would have no adverse effect on archaeological resources and that no further work is needed.

Consultation

Overall TVA finds that the proposed actions regarding the plaza and exterior renovations to the KOC and Plaza would have no adverse effect on the NRHP-eligible KOC or any archaeological resources. Thus, this project will have no significant impacts to cultural resources.

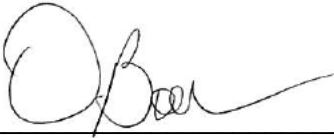
Pursuant to Section 106 of the NHPA, TVA consulted with the TN SHPO and federally recognized tribes regarding the proposed changes to the KOC. On April 30, 2021, the TN SHPO requested additional information regarding the changes to the plaza over time and a site visit and walk down of the KOC Plaza. On May 4, 2021, TVA also consulted with the Historic Zoning Planner for Knoxville-Knox County Planning, Lindsay Crockett. On May 20, 2021, TVA's Architectural Historian led a walk-through of the KOC plaza for TN SHPO staff and provided a presentation with additional information. On July 30, 2021, TVA provided a letter summarizing the walk thru and the TN SHPO concurred with TVA's findings that modifications to the KOC and Plaza would have no adverse effect on historic properties. Additionally, the TN SHPO concurred that the proposed modifications would not diminish the integrity of the NRHP-eligible KOC, nor would the project diminish the integrity of any other resources adjacent to the KOC. On July 30, 2021, the TN SHPO stated it had no objection to the project. The consultation letters are included in Attachment A.

Mitigation

TVA will continue to employ all measures described in the 2017 EA to mitigate the adverse impacts that may occur. No additional mitigation measures are proposed.

Conclusion and Findings

The additional information recorded herein updates TVA's records and confirms that no additional environmental issues with potential to significantly impact environmental resources exists pertaining to the proposed modifications to the KOC and Plaza. The proposal would not be a major federal action significantly affecting the environment.



Dawn Booker
Manager
NEPA Program

08/18/2021

Date Signed

ATTACHMENT A



Tennessee Valley Authority, 400 West Summit Hill Drive, Knoxville, Tennessee 37902

May 13, 2020

Mr. E. Patrick McIntyre, Jr.
Executive Director
and State Historic Preservation Officer
Tennessee Historical Commission
2941 Lebanon Pike
Nashville, Tennessee 37214

Dear Mr. McIntyre:

TENNESSEE VALLEY AUTHORITY (TVA), INITIATION OF CONSULTATION FOR THE PROPOSED WEST TOWER AND PLAZA RENOVATIONS, KNOXVILLE OFFICE COMPLEX (KOC), KNOX COUNTY, TENNESSEE (35.96637, -83.92021)

TVA currently proposes to renovate the exterior of the West Tower, the interior lobby of both the East Tower and the West Tower, and the exterior between the East and West Towers of the Knoxville Office Complex (KOC). The KOC is located at 400 West Summit Hill Drive, in downtown Knoxville, Tennessee (36.96637; -83.92021).

TVA has previously consulted with your office regarding TVA's KOC. Since October 2015, when TVA first considered the sale or lease of all, or a portion of its KOC facility (which includes the KOC, the Fritts Lot (east of the East Tower of the KOC), and the Summer Place Complex, TVA has consulted with you on actions associated with the redevelopment of this property. TVA ultimately determined to remain within the premises, consolidating the majority of TVA operations into the West Tower and Concourse and Service levels (which runs beneath the West Tower and East Tower) and to convey a term easement for floors 1 (Plaza) through 12 of the East Tower and a permanent easement for the entirety of the Summer Place Complex.

This previous consultation determined that the KOC was eligible for listing in the National Register of Historic Places (NRHP) under Criteria Consideration G as a property that has achieved significance within the past fifty years and under Criterion A for its association with the development of TVA and the revitalization of Knoxville's Market Square (Figures 1-5). The recommended NRHP boundary for the KOC includes boundary of the KOC and the Fritts Lot (see Figure 3).

Through all of the previous consultations related to the redevelopment of the KOC, TVA has found that all of the proposed actions would result in no effect or no adverse effect to historic properties—except for the proposed sale or lease of the entire KOC site—as those actions have not affected the character-defining features of the KOC (Table 1). Given its significance under Criterion A and Criteria Consideration G, the character-defining features of the buildings include: the overall form (two 12-story rectangular towers set over Concourse and Service levels

between the two towers), neutral concrete exterior, wide bands of continuous windows with dark glass, and a central open space between the two towers extending to Market Square. Character-defining features of the interiors of the East Tower and West Tower include a lobby entrance on the interior Plaza level and a central elevator lobby with a bank of eight personnel elevators and one freight elevator in the West Tower and six personnel elevators and one freight elevator in the East Tower. The other floors of the building are characterized by large, open spaces centrally anchored around central elevator lobbies.

Table 1. Previous Consultations on the KOC since 2015

Date	Subject of Consultation
June 2017	Addition of GPS Antenna on the roof of KOC
July/August 2017	Summer Place Complex/KOC East Tower Easement and Renovation
April/May 2018	East Tower Secondary Egress
August 2019	East Tower Window Cleaning and In-kind Repair/Replacement
February 2019	East Tower Loading Dock and Fritts Lot
April 2019	West Tower Emergency Generator

Since 2015, TVA has developed various plans for how to best renovate the facility to suit both the needs of TVA and the new occupants to Summer Place Complex and the East Tower. While some of the early plans included extensive changes to the exterior through the addition of exterior elements (i.e. screening along exterior elevations or around the mechanical area above the 12th floor), TVA has minimized the effects to the exterior of the building. TVA now proposes the following activities:

West Tower :

- to clean and repair the concrete exterior;
- apply stain (similar neutral color) to the concrete;
- in-kind repair and/or replacement of windows (identical to actions previously consulted on in regards to the East Tower);
- application of an interior window film for added energy efficiency; and
- installation of additional antennae/communications devices on the roof
-

East Tower and West Tower:

- replacement of signs on the exterior of the mechanical space on the roof (above the 12th floor), similar to existing TVA signs in size and scale (*TVA would be installing new signage on the West Tower, while those on the East Tower would be designed and installed by new tenants.*); and
- interior renovations to the plaza level of the East Tower and West Tower retaining character-defining features including the open elevator lobby (*TVA would only be completing these renovations to the West Tower; any renovations to the East Tower Plaza interior or other floors will be proposed, reviewed by TVA, and approved prior to completion by the tenants of the building. Should any future renovations proposed by the tenant have the potential to affect the character-defining features of the building, TVA will consult on those plans in the future.*);

Exterior Plaza (Figures 6-7):

- Americans with Disabilities Act (ADA)-compliant entrances and ramps to the towers and Plaza;
- Installation of removable bollards on Wall Avenue (designed to restrict vehicular traffic and reduce impediments for pedestrian access to the exterior Plaza from Market Square);
- Removal of the prominent water fountain (non-functional and cannot be made functional due to water flow issues);
- Removal of the mid-1990s skylight in the center of the Plaza (not an original feature of the Plaza design);
- Addition of new steps, decorative sculpture (possibly with a water feature), seating, planters, shade covers, embedded map feature, and three stone monuments;
- Construction of low-profile protective walls on the north side of the West Tower; and
- Planting of native foliage throughout the grounds.

TVA has determined that this project is an undertaking (as defined at 36 CFR § 800.16(y)) that has the potential to cause effects on historic properties. We are initiating consultation under Section 106 of the National Historic Preservation Act for this undertaking. TVA proposes that the area of potential effects (APE) consists of the project area (footprint) and areas within a 0.5-mile radius of the undertaking within the viewshed of the proposed project (Figure 8). Areas within the 0.5-mile radius that are not within view of the proposed project due to an obstructed line of sight (e.g. terrain, vegetation, and/or modern built environments) are not considered to be part of the APE. TVA seeks your concurrence on the appropriateness of this APE.

Historic Architectural Resources

The finishes, light fixtures, security measures, and café and meeting spaces that extend from the lobby reflect renovations completed in the mid-1990s. These renovations included the addition of a new large central reception desk in each tower lobby. Therefore, any changes to the finishes or furnishings of the lobbies would not result in a loss of historic material. Given the limited scale and scope of these proposed actions (except for the redevelopment of the exterior Plaza between the two towers), TVA finds all of these activities and any future activities of similar scale and scope do not affect the character-defining features of the tower. Therefore, they will not have an effect on the KOC or any other historic properties within the view of the KOC.

The current exterior Plaza is outdated, rarely utilized, and disconnected from the adjacent Market Square. Improvements to the exterior Plaza would make it more pedestrian-friendly from Wall Avenue, tie it into Market Square, and improve accessibility with the installation of ADA-compliant ramps and entrances.

Based on viewshed analysis (see Figure 8), it appears that the majority of historic architectural resources within the viewshed of the exterior Plaza are located along and around Market Square. TVA proposes to survey, assess for NRHP-eligibility, and assess effect of the project

upon all of the historic architectural resources within both the viewshed of the exterior Plaza and a 0.5-mile radius. TVA seeks your concurrence with the appropriateness of this proposed survey effort.

Archaeological Resources

The proposed ADA-compliant ramp from Wall Avenue the Plaza level on the south side of the East Tower during a geophysical survey of the KOC in 2016 using ground-penetrating radar (GPR) (Patch, et al 2016) as part of the evaluation of the possible sale of the KOC property. An anomaly was identified beneath the sidewalk on the southeastern corner of the property where Strong Street intersects Wall Avenue. The anomaly was interpreted as a possible remnant of the basement of one of the commercial structures that occupied the location prior to the construction of KOC. Based on the historical research conducted during the initial survey, a two-story commercial building occupied the lot from 1884 until being razed in 1905 for the construction of the Van Deventer Building. The latter building was remodeled in 1917 to become the St. James Hotel, which stood until 1973 after the property was purchased by TVA. The steep, landscaped slope adjacent to the south wall of the East Tower precluded any additional GPR transects to the north of the anomaly. TVA determined the site to be potentially eligible for inclusion on the NRHP in consultation with your office in December 2016. The anomaly detected within the boundaries of Site 40KN357 may be affected by the currently proposed improvements to KOC. As such, archaeological testing to investigate the anomaly will be conducted prior to any ground disturbing activities in that area. The purpose of the additional archaeological testing will be to determine if Site 40KN357 retains sufficient integrity to be eligible for inclusion on the NRHP. The proposed scope of work for this research is attached for your review.

TVA conducted an additional archaeological survey in 2020 to determine if the possible structural remains discovered during the geophysical survey extended to the north beneath the steep landscaped slope included in the boundaries of Site 40KN357. The results of this survey are detailed in the attached letter report titled *Geotechnical Borings and Archaeological Monitoring, Knox County, Tennessee* (Bradbury 2020). The survey was conducted using soil coring on the slope. Two cores were taken on the slope, one extending to 1.76 meters below the ground surface and the other to 3.45 meters below ground surface. No evidence of any structural remains or intact cultural deposits was noted. Each core revealed a continuous zone of homogenous clay from the base of the topsoil to the base of the sample. This indicates that no intact archaeological materials related to KN357 are located in the area to be affected by construction of the ADA ramp. Although specific plans were not available at the time of the survey, it is unlikely that the proposed ramp construction will extend below the depth of either core. Based on the results of this survey, the construction of the proposed ramp will have no adverse effect on Site 40KN357 and no additional archaeological work is recommended for that portion of the site.

Mr. E. Patrick McIntyre, Jr.
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May 13, 2020

By this letter, TVA is initiating consultation regarding the proposed undertaking. TVA is seeking concurrence on the following:

- TVA's finding that the proposed actions regarding East Tower and West Tower renovations will not affect KOC, given the limited scope and scale and that they are keeping with the Secretary of Interior's Standards;
- TVA's proposed APE for the exterior Plaza renovations;
- TVA's proposed reconnaissance survey of historic architectural resources within the viewshed of the exterior plaza and a 0.5-mile radius;
- TVA's finding that, based on the results of geotechnical borings and archaeological monitoring, the undertaking will have no adverse effect on the portion of Site 40KN357 within the APE; and
- TVA's proposed Phase II archaeological investigations for an anomaly identified in 2016 associated with site 40KN357.

Pursuant to 36 CFR Part 800.3(f)(2) TVA is consulting with federally recognized Indian tribes regarding historic properties within the proposed project's APE that may be of religious and cultural significance and are eligible for the NRHP.

Please contact Hallie Hearnese in Knoxville by telephone (865) 632-3463 or by email, hahearnese@tva.gov with your comments.

Sincerely,



Clinton E. Jones
Manager
Cultural Compliance

HAH:ABM

Enclosures

cc (Enclosures):

Ms. Jennifer Barnett
Tennessee Division of Archaeology
1216 Foster Avenue, Cole Bldg. #3
Nashville, Tennessee 37210

References Cited

Bradbury, Andrew

- 2020 Geotechnical Borings and Archaeological Monitoring, Knox County, Tennessee.
Prepared by Cultural Resource Analysts, Knoxville, Tennessee for TVA, Knoxville.

Patch, Shawn M., Robbie Jones, Sarah Lowry, Ashley Krauss, and Sydney Shoof

- 2016 Archival Research and Geophysical Survey for Proposed Transfer of the Tennessee
Valley Authority Knoxville Office Complex (KOC), Knox County, Tennessee.
Prepared by New South Associates, Stone Mountain, Georgia, for TVA, Knoxville.

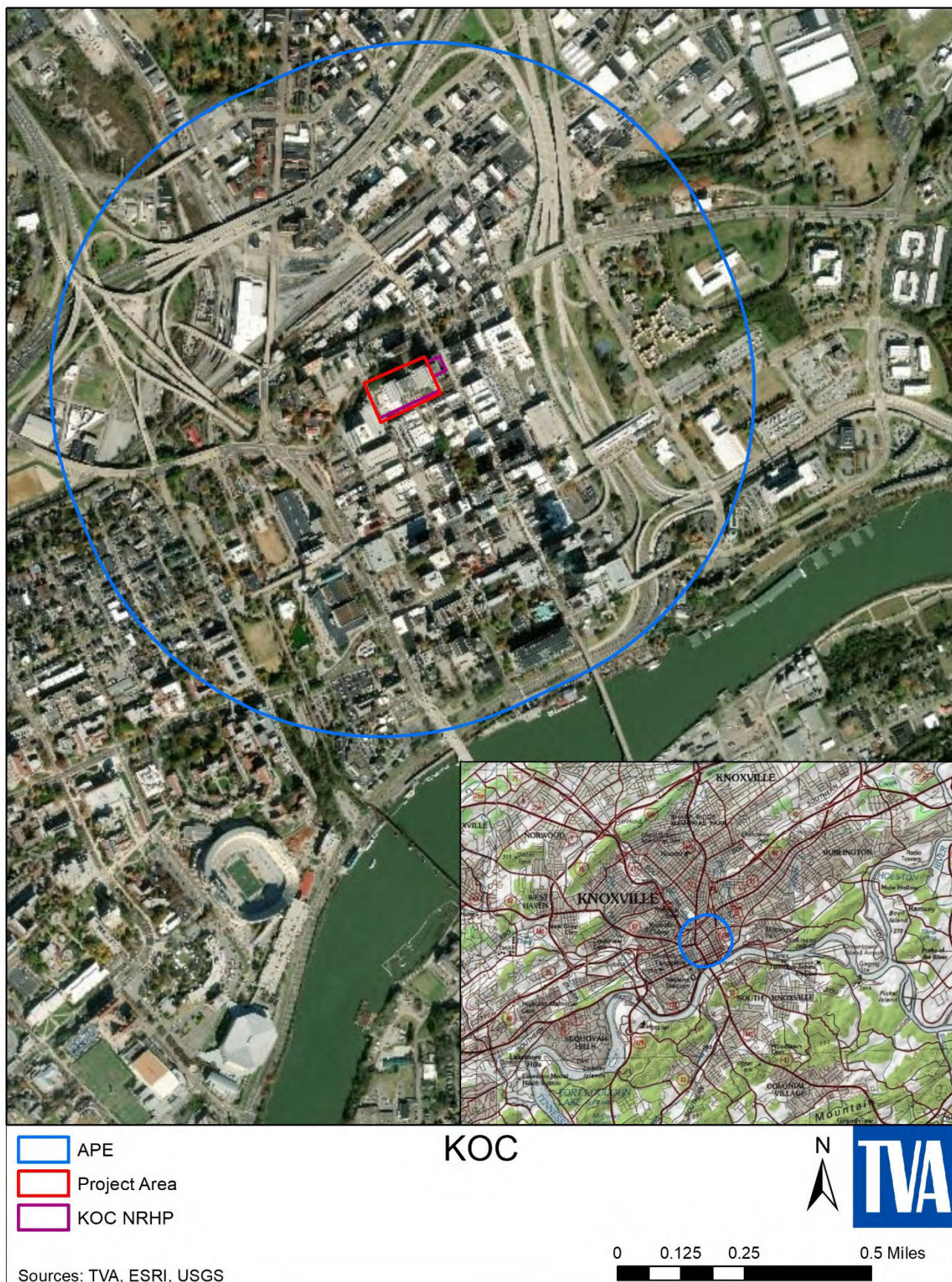


Figure 1. Satellite image and topographic quadrangle map showing the location of the KOC NRHP-eligible boundary, project area, and 0.5-mile APE radius.



Figure 2. Satellite image depicting the project area.

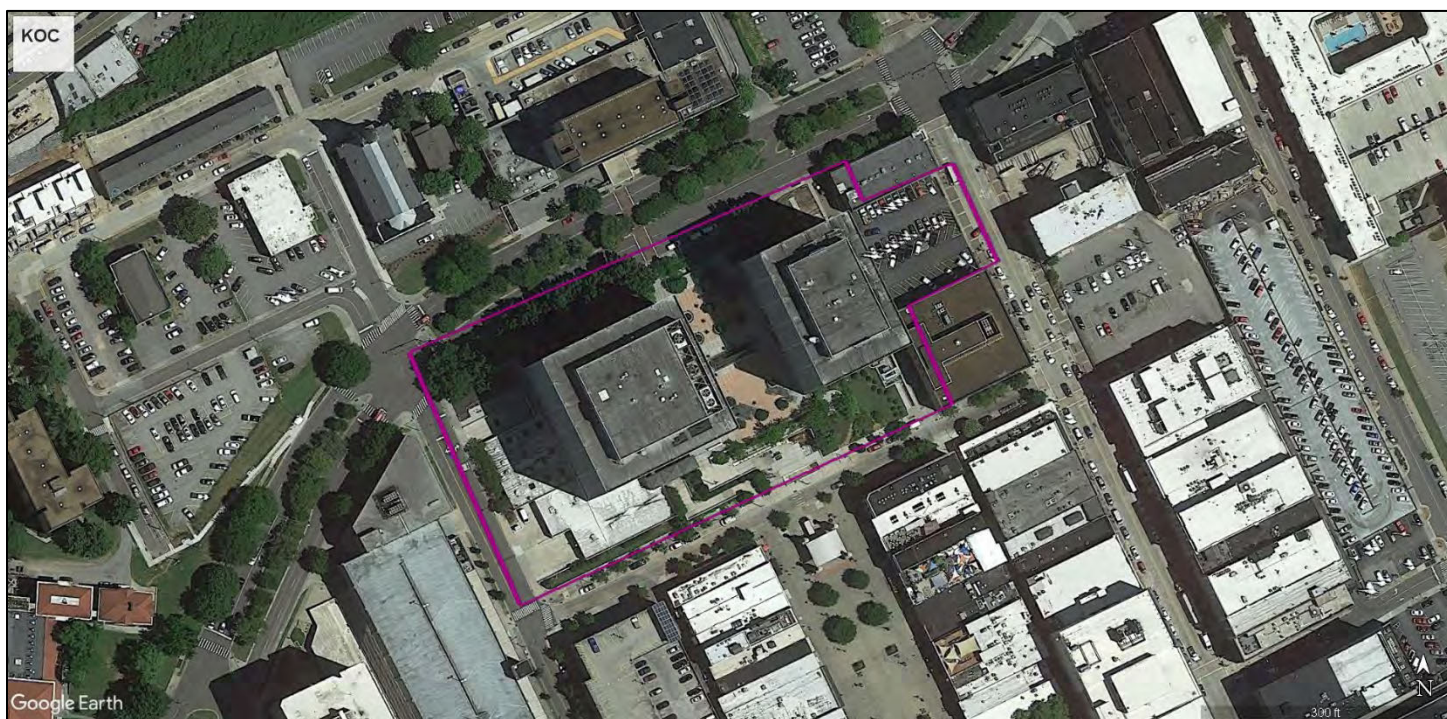


Figure 3. Satellite image depicting KOC's NRHP-eligible boundary.



Figure 4. View of KOC from Market Square, looking northwest.



Figure 5. View of top portion of KOC's East Tower, looking northeast.



Figure 6. Preliminary plan for exterior Plaza renovations, aerial view of KOC from Market Square looking northwest.

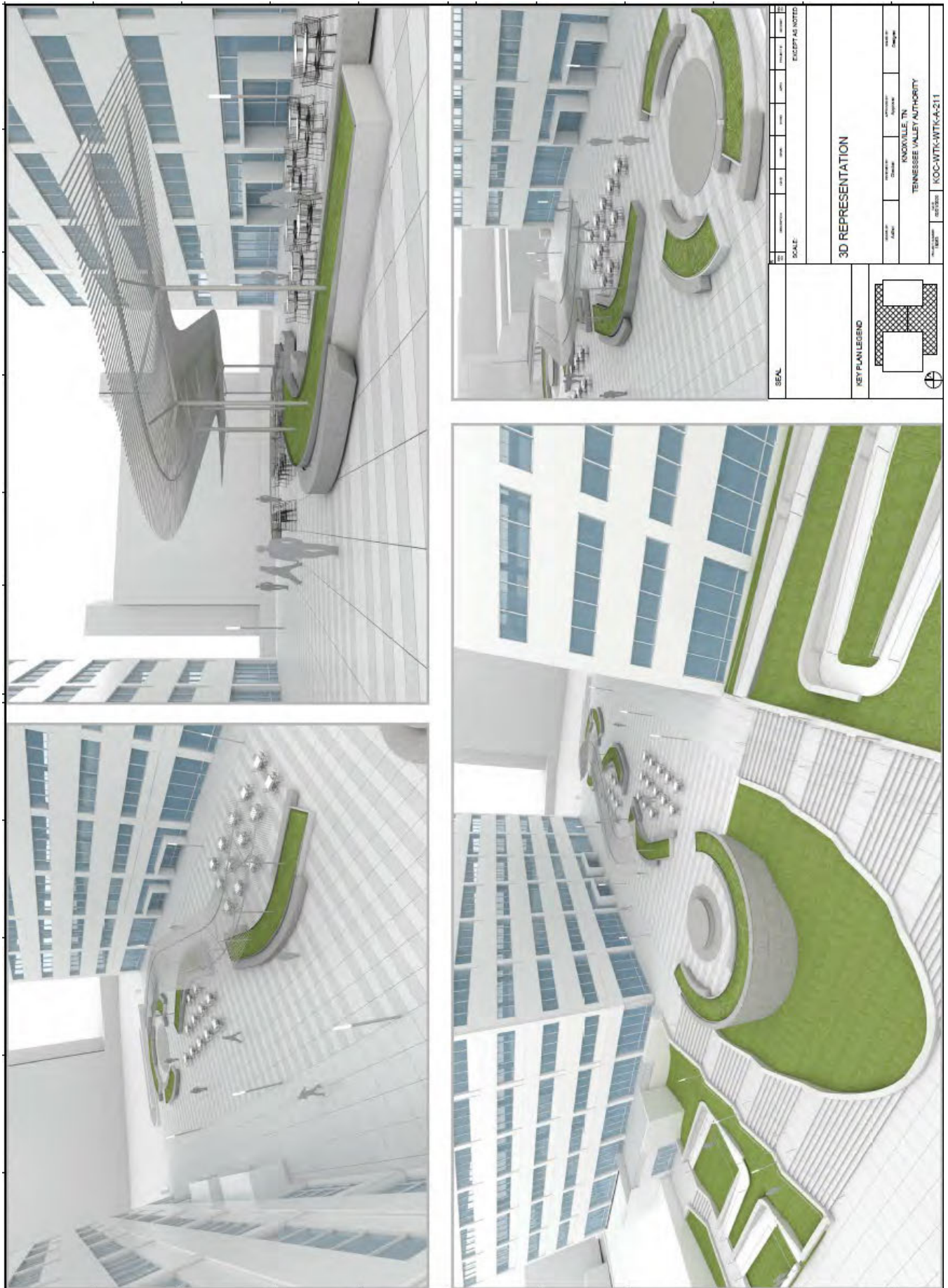


Figure 7. 3D Representation of Proposed Plaza, site plan of KOC Plaza.



Figure 8. Proposed APE for the exterior KOC Plaza renovations.

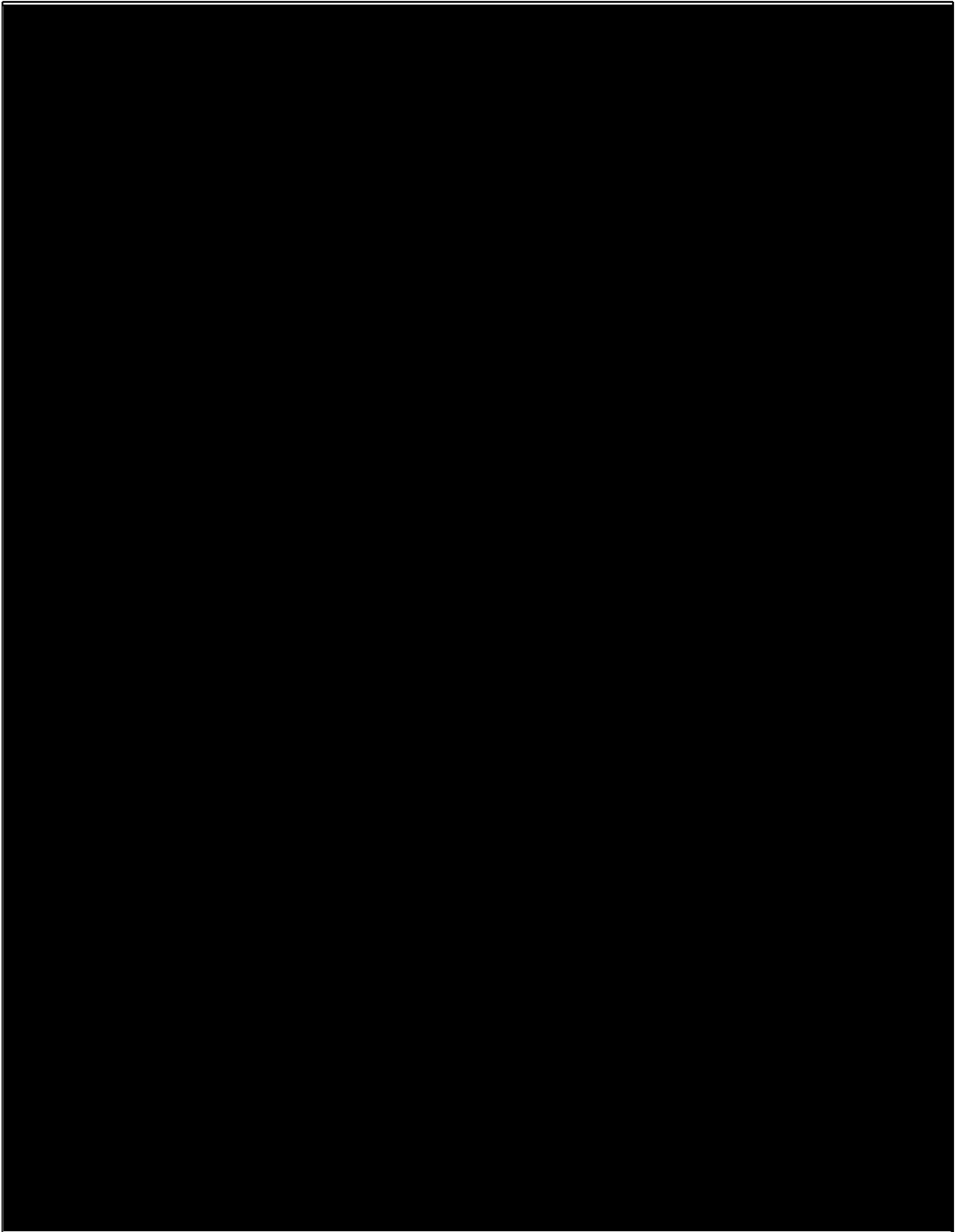


Figure 9. Location of Site 40KN357 and the geophysical anomaly.



Tennessee Valley Authority, 400 West Summit Hill Drive, Knoxville, Tennessee 37902

May 18, 2020

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Dear Sir/Madam:

TENNESSEE VALLEY AUTHORITY (TVA), INITIATION OF CONSULTATION FOR THE PROPOSED WEST TOWER AND PLAZA RENOVATIONS, KNOXVILLE OFFICE COMPLEX (KOC), KNOX COUNTY, TENNESSEE (35.96637, -83.92021)

TVA currently proposes to renovate the exterior of the West Tower, the interior lobby of both the East Tower and the West Tower, and the exterior between the East and West Towers of the Knoxville Office Complex (KOC). The KOC is located at 400 West Summit Hill Drive, in downtown Knoxville, Tennessee (36.96637; -83.92021).

TVA has previously consulted with you regarding TVA's KOC. In October 2015, TVA considered the sale or lease of all, or a portion of its KOC facility (which includes the KOC, the Fritts Lot, and the Summer Place Complex. TVA ultimately determined to remain within the premises, consolidating the majority of TVA operations into the West Tower and Concourse and Service levels (which runs beneath the West Tower and East Tower) and to convey a term easement for floors 1 (Plaza) through 12 of the East Tower and a permanent easement for the entirety of the Summer Place Complex.

Through consultation, the KOC was determined eligible for listing in the National Register of Historic Places (NRHP) under Criteria Consideration G as a property that has achieved significance within the past fifty years and under Criteria A for its association with the development of TVA and the revitalization of Knoxville's Market Square (Figures 1-5). The recommended NRHP boundary for the KOC includes boundary of the KOC and the Fritts Lot (see Figure 3).

Since 2015, TVA has developed various plans for how to best renovate the facility to suit both the needs of TVA and the new occupants to the Summer Place Complex and the East Tower. While some of the early plans included extensive changes to the exterior through the addition of exterior elements (i.e. screening along exterior elevations or around the mechanical area above the 12th floor), TVA has minimized the effects to the exterior of the building. TVA now proposes the following activities:

West Tower:

- to clean and repair the concrete exterior;
- apply stain (similar neutral color) to the concrete;
- in-kind repair and/or replacement of windows (identical to actions previously consulted on in regards to the East Tower);
- application of an interior window film for added energy efficiency; and
- installation of additional antennae/communications devices on the roof

East Tower and West Tower:

- replacement of signs on the exterior of the mechanical space on the roof (above the 12th floor), similar to existing TVA signs in size and scale (*TVA would be installing new signage on the West Tower, while those on the East Tower would be designed and installed by new tenants.*); and
- interior renovations to the plaza level of the East Tower and West Tower retaining character-defining features including the open elevator lobby (*TVA would only be completing these renovations to the West Tower; any renovations to the East Tower Plaza interior or other floors will be proposed, reviewed by TVA, and approved prior to*

completion by the tenants of the building. Should any future renovations proposed by the tenant have the potential to affect the character-defining features of the building, TVA will consult on those plans in the future.);

Exterior Plaza (Figures 4-5):

- Americans with Disabilities Act (ADA)-compliant entrances and ramps to the towers and Plaza;
- Installation of removable bollards on Wall Avenue (designed to restrict vehicular traffic and reduce impediments for pedestrian access to the exterior Plaza from Market Square);
- Removal of the prominent water fountain (non-functional and cannot be made functional due to water flow issues);
- Removal of the mid-1990s skylight in the center of the Plaza (not an original feature of the Plaza design);
- Addition of new steps, decorative sculpture (possibly with a water feature), seating, planters, shade covers, embedded map feature, and three stone monuments;
- Construction of low-profile protective walls on the north side of the West Tower; and
- Planting of native foliage throughout the grounds.

TVA has determined that this project is an undertaking (as defined at 36 CFR § 800.16(y)) that has the potential to cause effects on historic properties. We are initiating consultation under Section 106 of the National Historic Preservation Act for this undertaking. TVA proposes that the area of potential effects (APE) consists of the project area (footprint) and areas within a 0.5-mile radius of the undertaking within the viewshed of the proposed project (Figure 6). Areas within the 0.5-mile radius that are not within view of the proposed project due to an obstructed line of sight (e.g. terrain, vegetation, and/or modern built environments) are not considered to be part of the APE. TVA seeks your concurrence on the appropriateness of this APE.

Historic Architectural Resources

The finishes, light fixtures, security measures, and café and meeting spaces that extend from the lobby reflect renovations completed in the mid-1990s. These renovations included the addition of a new large central reception desk in each tower lobby. Therefore, any changes to the finishes or furnishings of the lobbies would not result in a loss of historic material. Given the limited scale and scope of these proposed actions (except for the redevelopment of the exterior Plaza between the two towers), TVA finds all of these activities and any future activities of similar scale and scope do not affect the character-defining features of the tower. Therefore, they will not have an effect on the KOC or any other historic properties within the view of the KOC.

The current exterior Plaza is outdated, rarely utilized, and disconnected from the adjacent Market Square. Improvements to the exterior Plaza would make it more pedestrian-friendly from Wall Avenue, tie it into Market Square, and improve accessibility with the installation of ADA-compliant ramps and entrances.

Based on viewshed analysis (see Figure 8), it appears that the majority of historic architectural resources within the viewshed of the exterior Plaza are located along and around Market Square. TVA proposes to survey, assess for NRHP-eligibility, and assess effect of the project upon all of the historic architectural resources within both the viewshed of the exterior Plaza and a 0.5-mile radius.

Archaeological Resources

The proposed ADA-compliant ramp from Wall Avenue the Plaza level on the south side of the East Tower during a geophysical survey of the KOC in 2016 using ground-penetrating radar (GPR) (Patch, et al 2016) as part of the evaluation of the possible sale of the KOC property (Figure 7). An anomaly was identified beneath the sidewalk on the southeastern corner of the property where Strong Street intersects Wall Avenue. The anomaly was interpreted as a possible remnant of the basement of one of the commercial structures that occupied the location prior to the construction of KOC. Based on the historical research conducted during the initial survey, a two-story commercial building occupied the lot from 1884 until being razed in 1905 for the construction of the Van Deventer Building. The latter building was remodeled in 1917 to become the St. James Hotel, which stood until 1973 after the property was purchased by TVA. The steep, landscaped slope adjacent to the south wall of the East Tower precluded any additional GPR transects to the north of the anomaly. TVA determined the site to be potentially eligible for inclusion on the NRHP in December 2016. The anomaly detected within the boundaries of Site 40KN357 may be affected by the currently proposed improvements to KOC. As such, archaeological testing to investigate the anomaly will be conducted prior to any ground disturbing activities in that area. The purpose of the additional archaeological testing will be to determine if Site 40KN357 retains sufficient integrity to be eligible for inclusion in the NRHP. The proposed scope of work for this research is attached for your review.

TVA conducted an additional archaeological survey in 2020 to determine if the possible structural remains discovered during the geophysical survey extended to the north beneath the steep landscaped slope included in the boundaries of Site 40KN357. The results of this survey are detailed in the attached letter report titled *Geotechnical Borings and Archaeological Monitoring, Knox County, Tennessee* (Bradbury 2020). The survey was conducted using soil coring on the slope. Two cores were taken on the slope, one extending to 1.76 meters below the ground surface and the other to 3.45 meters below ground surface. No evidence of any structural remains or intact cultural deposits was noted. Each core revealed a continuous zone of homogenous clay from the base of the topsoil to the base of the sample. This indicates that no intact archaeological materials related to KN357 are located in the area to be affected by construction of the ADA ramp. Although specific plans were not available at the time of the survey, it is unlikely that the proposed ramp construction will extend below the depth of either core. Based on the results of this survey, the construction of the proposed ramp will have no adverse effect on Site 40KN357 and no additional archaeological work is recommended for that portion of the site.

Pursuant to 36 CFR § 800.3(f)(2), TVA is consulting with federally recognized Indian tribes regarding properties within the proposed project's APE that may be of religious and cultural

Sir/Madam
Page 4
May 18, 2020

significance to them and eligible for the NRHP: Absentee Shawnee Tribe of Indians of Oklahoma, Alabama-Coushatta Tribe of Texas, Cherokee Nation, Coushatta Tribe of Louisiana, Eastern Band of Cherokee Indians, Eastern Shawnee Tribe of Oklahoma, Kialegee Tribal Town, The Muscogee (Creek) Nation, Shawnee Tribe, Thlopthlocco Tribal Town, and United Keetoowah Band of Cherokee Indians in Oklahoma.

By this letter, TVA is providing notification of these findings and is seeking your comments regarding any properties that may be of religious and cultural significance and may be eligible for listing in the NRHP pursuant to 36CFR § 800.2(c)(2)(ii), 800.3(f)(2), and 800.4(a)(4)(b).

Please respond by June 12, 2020 if you have any comments on the proposed undertaking or the Phase II scope of work. If you have any questions, please contact me by phone, (865) 632-2464, or by email, mmshuler@tva.gov.

Sincerely,



Marianne Shuler
Senior Specialist, Archaeologist and Tribal Liaison
Cultural Compliance

HAH:ABM

Enclosures

cc (Enclosures):

Mr. Paul Barton
Eastern Shawnee Tribe of
Oklahoma
127 West Oneida
Seneca, Missouri 64865

Ms. Sheila Bird
Shawnee Tribe
Post Office Box 189
Miami, Oklahoma 74355

Ms. Corain Lowe-Zepeda
Muscogee (Creek) Nation
Post Office Box 580
Okmulgee, Oklahoma 74447

Mr. Russell Townsend
Eastern Band of Cherokee Indians
Post Office Box 455
Cherokee, North Carolina 28719

Ms. Charlotte Wolfe
United Keetoowah Band of
Cherokee
18263 W. Keetoowah Circle
Tahlequah, OK 74464

References Cited

Bradbury, Andrew

- 2020 Geotechnical Borings and Archaeological Monitoring, Knox County, Tennessee.
Prepared by Cultural Resource Analysts, Knoxville, Tennessee for TVA, Knoxville.

Patch, Shawn M., Robbie Jones, Sarah Lowry, Ashley Krauss, and Sydney Shoof

- 2016 Archival Research and Geophysical Survey for Proposed Transfer of the
Tennessee Valley Authority Knoxville Office Complex (KOC), Knox County,
Tennessee. Prepared by New South Associates, Stone Mountain, Georgia,
for TVA, Knoxville.

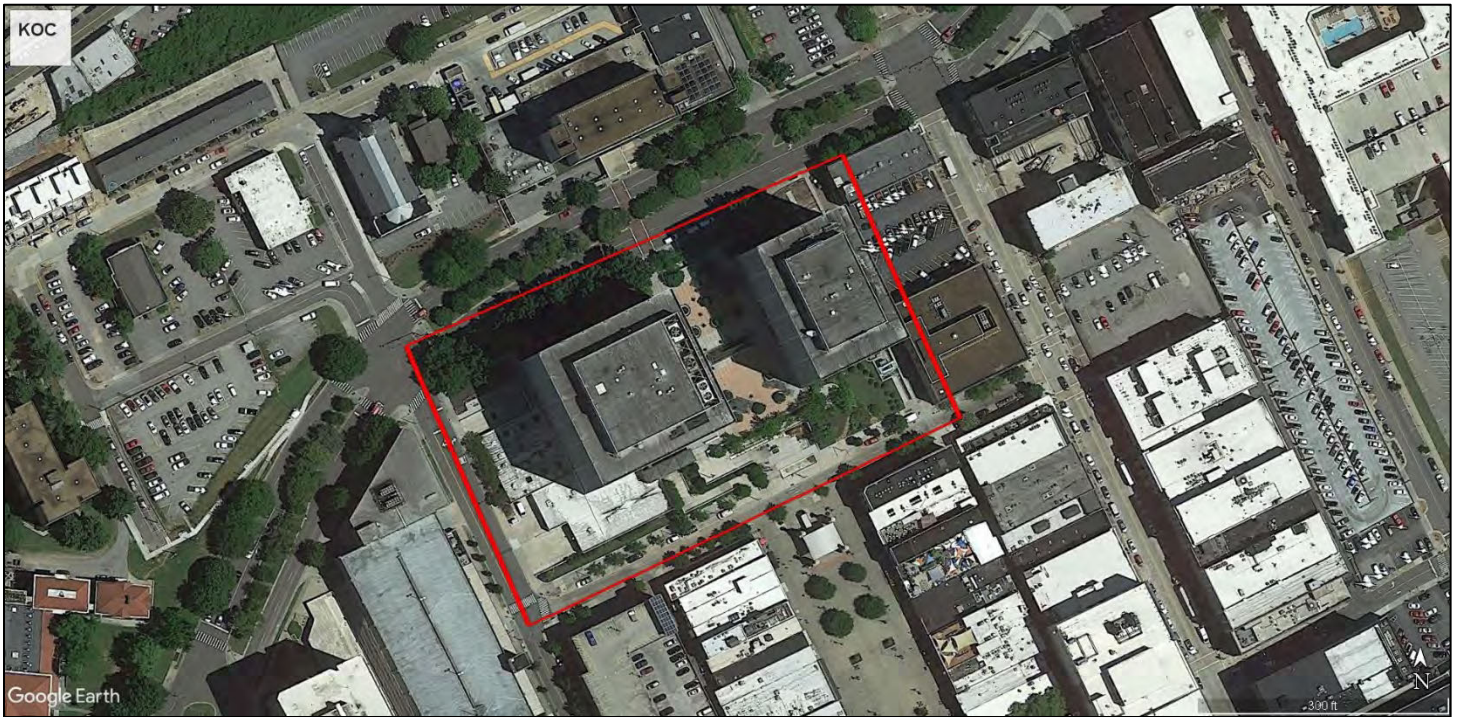


Figure 1. Satellite image depicting the project area.

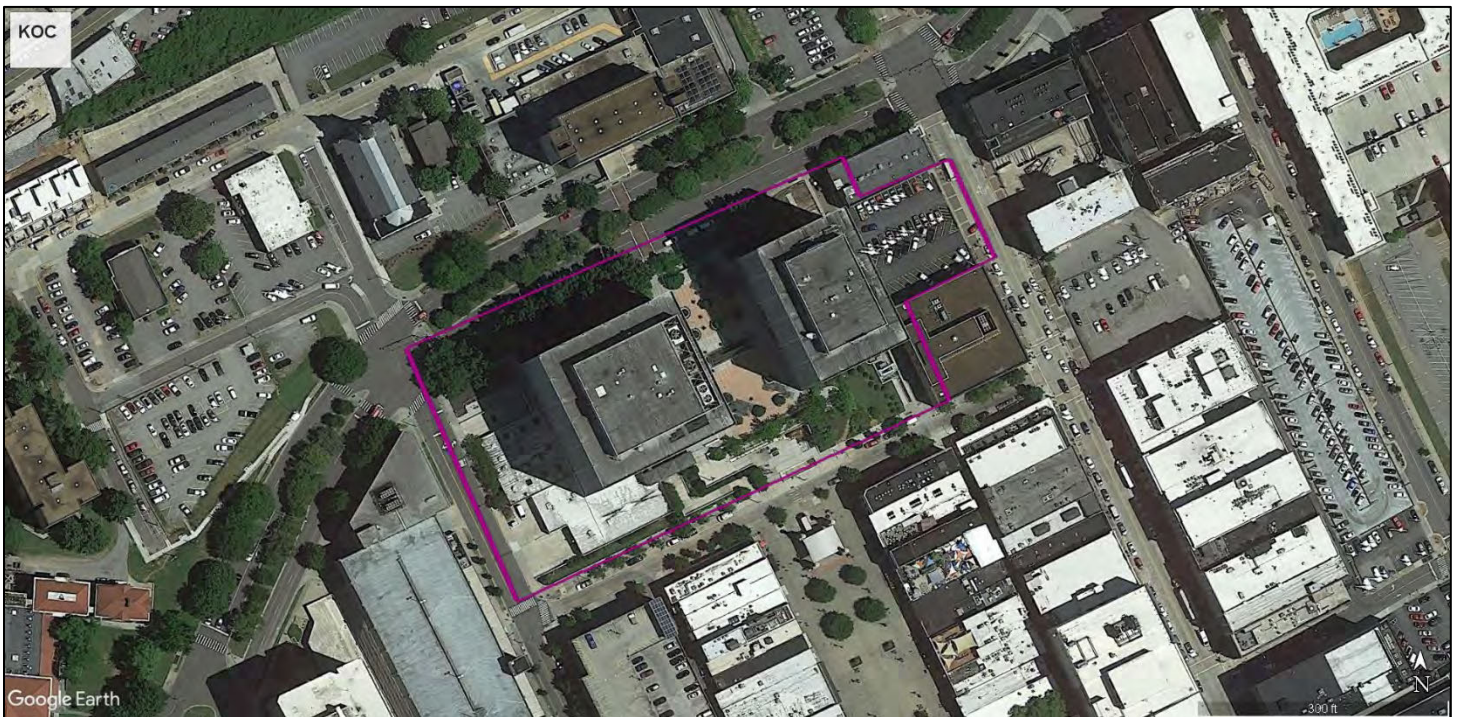


Figure 2. Satellite image depicting KOC's NRHP-eligible boundary.



Figure 3. View of KOC from Market Square, looking northwest.



Figure 4. Preliminary plan for exterior Plaza renovations, aerial view of KOC from Market Square looking northwest.

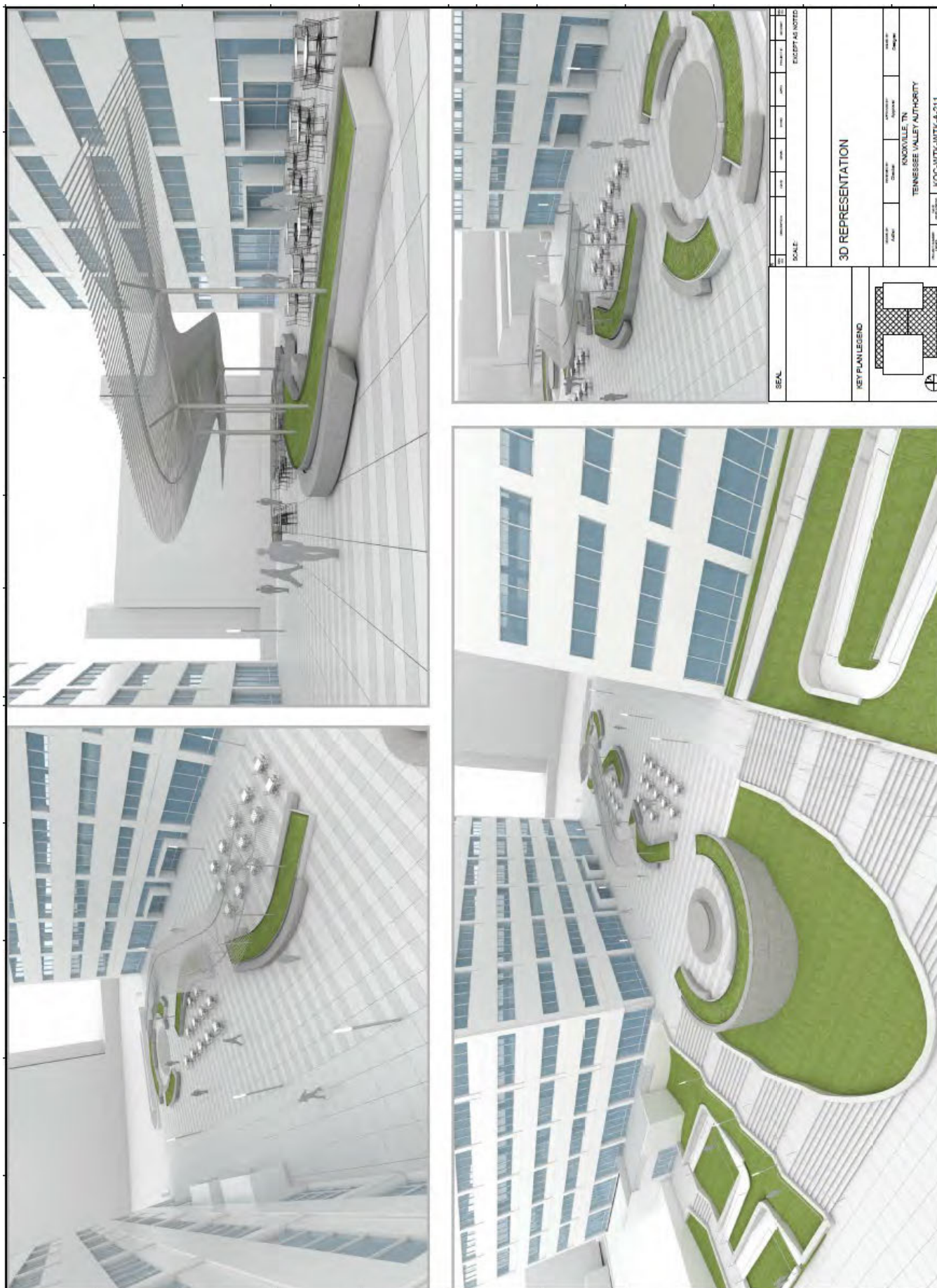


Figure 5. 3D Representation of Proposed Plaza, site plan of KOC Plaza.



Figure 6. Proposed APE for the exterior KOC Plaza renovations.

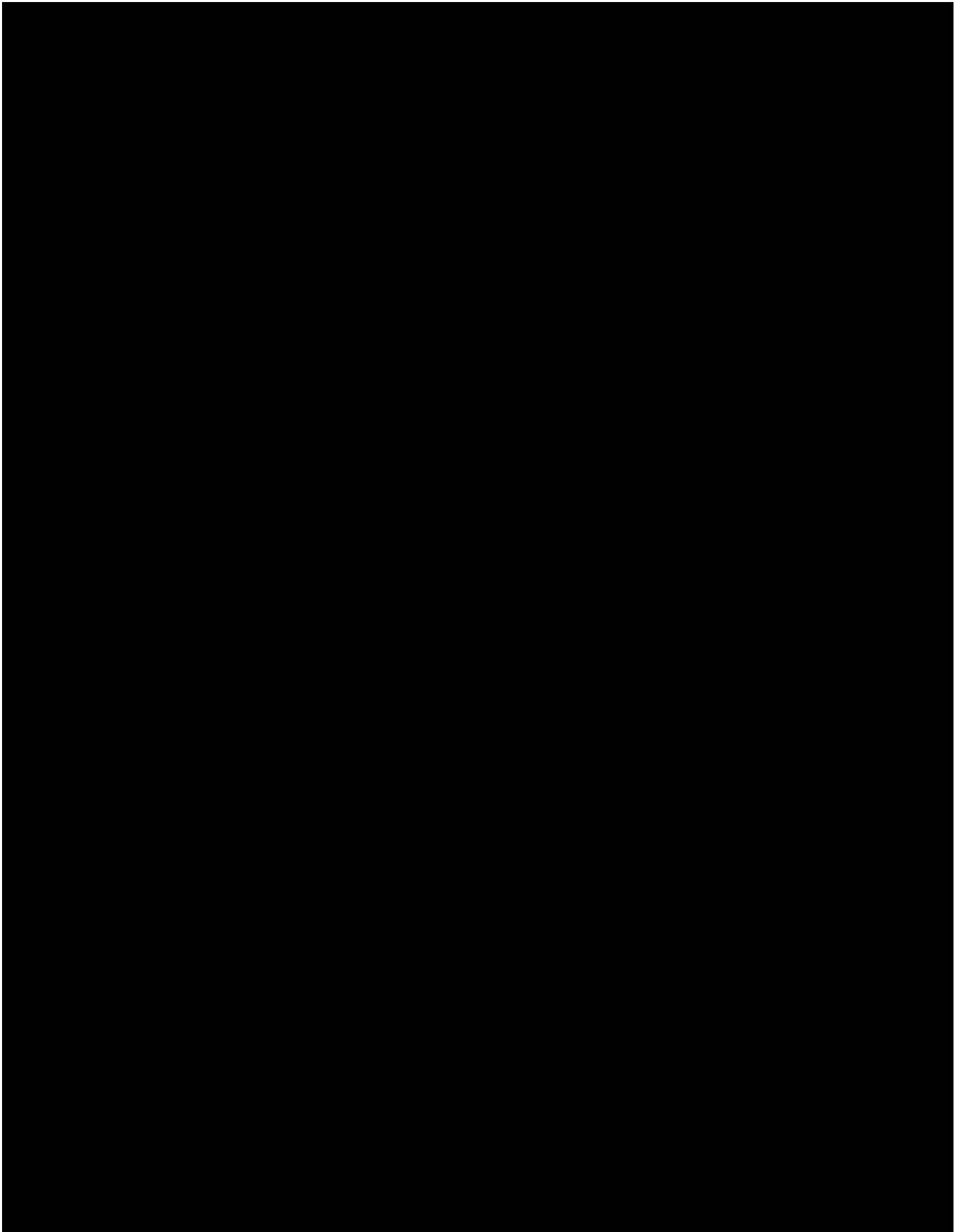


Figure 7. Location of Site 40KN357 and the geophysical anomaly.



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May 21, 2020

Mr. Clinton E. Jones
Tennessee Valley Authority
Biological and Cultural Compliance
400 West Summit Hill Drive
Knoxville, TN 37902

RE: TVA / Tennessee Valley Authority, Initiation of Consultation for the Proposed West Tower and Plaza Renovations, Knoxville Office Complex (KOC), Knoxville, Knox County, TN

Dear Mr. Jones:

Pursuant to your request, this office has reviewed documentation concerning the above-referenced undertaking. Our review of and comment on your proposed undertaking are among the requirements of Section 106 of the National Historic Preservation Act. This Act requires federal agencies or applicants for federal assistance to consult with the appropriate State Historic Preservation Office before they carry out their proposed undertakings. The Advisory Council on Historic Preservation has codified procedures for carrying out Section 106 review in 36 CFR 800 (Federal Register, December 12, 2000, 77698-77739).

Based on the information provided, we concur that the Knoxville Office Complex (KOC) is still eligible for listing in the National Register of Historic Places (NRHP) under Criteria Consideration G as a property that has achieved significance within the past fifty years and under Criterion A for its association with the development of TVA and the revitalization of Knoxville's Market Square. We also concur that the recommended NRHP boundary for the KOC includes the KOC boundary and the Fritts Lot.

We further concur that the project as currently proposed will not adversely affect the historic resource. We concur with TVA's findings that:

- The proposed actions regarding the East Tower and West Tower renovations will not affect KOC, given the limited scope and scale, and that they are keeping with the Secretary of Interior's Standards;
- TVA's proposed APE for the exterior Plaza renovations;
- TVA's proposed reconnaissance survey of historic architectural resources within the viewshed of the exterior plaza and a 0.5-mile radius;

Mr. Clinton E. Jones

Page 2

May 21, 2020

- TVA's finding that, based on the results of geotechnical borings and archaeological monitoring, the undertaking will have no adverse effect on the portion of Site 40KN357 within the APE; and
- TVA's proposed Phase II archaeological investigations for an anomaly identified in 2016 associated with site 40KN357.

This office has no objection to the implementation of this project as currently planned. If project plans are changed or previously unevaluated archaeological resources are discovered during project construction, please contact this office to determine what further action, if any, will be necessary to comply with Section 106 of the National Historic Preservation Act. Questions and comments may be directed to Claire Meyer (615-770-1099). We appreciate your cooperation.

Sincerely,

A handwritten signature in black ink that reads "E. Patrick McIntyre, Jr." in a cursive script.

cem

E. Patrick McIntyre, Jr.
Executive Director and
State Historic Preservation Officer

EPM/cem



400 West Summit Hill Drive, Knoxville, Tennessee 37902

April 20, 2021

Mr. E. Patrick McIntyre, Jr.
Executive Director
and State Historic Preservation Officer
Tennessee Historical Commission
2941 Lebanon Pike
Nashville, Tennessee 37214

Dear Mr. McIntyre:

TENNESSEE VALLEY AUTHORITY (TVA), PROPOSED WEST TOWER AND PLAZA RENOVATIONS, KNOXVILLE OFFICE COMPLEX (KOC), KNOX COUNTY, TENNESSEE (35.96637, -83.92021) (TVA TRACKING NUMBER – CID 77028)

TVA currently proposes to renovate the exterior of the West Tower, the interior lobby of both the East Tower and the West Tower, and the exterior between the East and West Towers of the Knoxville Office Complex (KOC). The KOC is located at 400 West Summit Hill Drive, in downtown Knoxville, Tennessee (36.96637; -83.92021) (see Figures 1 and 2 of the attached report).

TVA previously consulted with your office regarding the redevelopment of TVA's KOC several times since October 2015. In our most recent consultation in May 2020, we determined that the proposed project had the potential for direct and visual effects to both archaeological and historic architectural resources, including the KOC. The proposed project plans have continued to develop and now indicate the anticipated limits of ground disturbance and all visual elements associated with the exterior design. The overall project design of the Plaza and Exterior of the KOC has not changed. However, details have been further refined, including the exact location of ground disturbance, the appearance of the elements within the plaza, the inclusion of revolving doors for enhanced security at the West Tower, and the need for bollards within the roadway to limit traffic at the southern edge of the TVA property. A full description of the proposed actions associated with the exterior and Plaza design is included in the attached report (Heavrin 2021). In addition to the alterations to the exterior design, the project also includes further detail on the design of the West Tower Plaza interior. The design now includes a separate visitor's lobby and waiting area, to provide additional security measures for TVA employees and contractors working on site. Furthermore, the interior plans do not incorporate the artifacts associated with TVA's Historic Collection that have been on display within the KOC since renovations in the 1990s.

Historic Architectural Survey for KOC Plaza and West Tower Exterior Renovations

Through consultation with your office, TVA determined that the area of potential effects (APE) for this portion of the project consists of the exterior Plaza renovations (project area or footprint) and any historic properties adjacent to the KOC and within view of the proposed Plaza

renovations (see Figures 1 and 2 of the attached report). TVA contracted with Cultural Resource Analysts, Inc. (CRA) to complete the historic architectural resource survey in February and March of 2021 (Heavrin 2021). The report titled *Historic Architectural Resources Survey for the Proposed Plaza Renovations at the Knoxville Office Complex, Knox County, Tennessee* is attached for your review. CRA recorded five resources, evaluated the eligibility of each resource for listing in the National Register of Historic Places (NRHP), and assessed potential effects of the proposed project on historic properties. The five recorded resources include the NRHP-eligible KOC (including the adjacent Fritts Lot), Immaculate Conception Catholic Church (KN-1080), the NRHP-listed Market Square Commercial Historic District, and two previously undocumented commercial buildings located along Gay Street and southeast of the KOC. CRA recommends that the KOC remains eligible for listing in the NRHP under Criterion A and under Criterion Consideration G and that the Market Square Commercial Historic District remains eligible for listing in the NRHP under Criteria A and C. Additionally, CRA recommends that Immaculate Conception Church remains potentially eligible and that the two newly-recorded resources are not eligible. Further, CRA recommends that the proposed project design would result in a finding of no adverse effect. TVA has reviewed the report and agrees with CRA's recommendations. Thus, TVA finds that the exterior renovations to the West Tower and Plaza would result in no adverse effects to historic properties.

In March 2021, just after the completion of CRA's historic architecture survey, McCarty Holsaple McCarty provided the final design for the review of bollards to TVA. These additional bollards are required by TVA Police (TVAP) in order to ensure additional security to the KOC and bring it up to safety standards required for federal buildings. Bollards along Wall Avenue (Figures 1-4), along the corner of Walnut Street near the emergency generator (reviewed as a separate project with you in 2019) (Figures 5-7), and along West Summit Hill Drive (Figures 8-11) will provide additional barriers to deter penetration of vehicles and other threats to further increase security at the KOC. The revision and/or addition to bollards to the Plaza design would not diminish the integrity of any surrounding resources identified by CRA in their recent survey, including the KOC. Therefore, TVA finds that the revision of the design to include bollards would result in no adverse effects to historic properties.

West Tower Interior Renovations

As with the exterior and plaza plans, the interior renovation plans have further developed since our latest consultation on this project in May 2020 (Figures 12-16). As discussed in previous consultation, the finishes, light fixtures, security screening, and café and meeting spaces that extend from the lobby reflect renovations completed in the mid-1990s. Therefore, any changes to the finishes or furnishings of the lobby, café and auditorium of the West Tower would not result in a loss of historic material. Even with the updated designs for the lobby, which include a vestibule space for security and screening for entry, the vestibule features as many glass walls as possible. The floorplan continues to feature an open lobby with direct access to the central elevator lobby. Therefore, no character-defining features of the KOC would be affected by the proposed interior renovations to the lobby, café, and auditorium. Thus, TVA finds that interior renovations to the lobby of the West Tower will not result in an adverse effect to the KOC.

As illustrated in the conceptual designs for the interior of the West Tower lobby, artifacts associated with TVA's Historic Collection are not incorporated into the new design. As a result, TVA would like to transfer the items of the Historic Collection located within the West Tower lobby and concourse levels to another institution so that they can remain on display to the public.

TVA is currently reviewing options for the future of the TVA Historic Collection; however, no decisions have been made for the future of the entire collection. TVA will further consult with your office on the larger management effort being considered for TVA's Historic Collection. Until options are determined regarding the larger collection, TVA currently proposes to remove items currently located within the concourse and lobby of the KOC from the Historic Collection (Figures 17-22). TVA is currently assessing options for the disposal of these objects either through temporary or permanent transfer to a museum to aid in telling the story of TVA's service to improve the lives of those living and working within the Tennessee Valley.

The majority of the historic collection is comprised of objects associated with TVA's history, research, and energy production. While these artifacts help illustrate TVA's historic past, they are small objects not designed for a specific location and/or are removed from their original setting and context. If the objects were once associated with hydroelectric project or other property listed in the NRHP, they no longer retain any context or understanding of the original resource, given their removal and display at the KOC, as a part of permanent displays. Thus, based on a review of the National Park Service (NPS) National Register Bulletin 15, they are unlikely to be eligible for listing in the NRHP as individual objects (NPS 1997:5). TVA finds that the artifacts currently displayed at the KOC are not eligible for listing in the NRHP; therefore, there are no effects to historic properties as a result of the transfer of these items from TVA's Historic Collection. Previous Section 106 agreement documents, developed in consultation with your office and others, have stipulated the retention of items to be retained within TVA's Historic Collection. None of the items currently displayed in the KOC are tied to previous agreement documents.

Archaeological Resources

Any additional ground disturbance associated with the addition of bollards associated with the proposed design for the KOC Plaza would occur within areas previously surveyed in 2016 through ground-penetrating investigations as a part of previous reviews associated with this project (Patch, et. al 2016). The only anomaly recorded as a part of that survey was associated with Site 40KN357; no bollards are proposed within the vicinity of that location. Therefore, TVA finds that no archaeological resources would be affected by the addition of bollards at the KOC.

TVA previously consulted with your office regarding a proposed scope of work for Phase II Archaeological testing to determine if an anomaly associated with site 40KN357, identified during previous ground-penetrating radar investigations (Patch, et. al 2016) retains sufficient integrity to be eligible for inclusion in the NRHP. Since our previous consultation in May 2020, the project plans have further developed and ground disturbance within the vicinity of the anomaly is no longer proposed. Therefore, TVA finds that no additional archaeological investigations are needed for site 40KN357, as it will not be affected by this proposed project.

Mr. E. Patrick McIntyre, Jr.
Page 4
April 20, 2021

By this letter, TVA is seeking your comment on the following:

- TVA's finding that the proposed actions regarding the plaza and exterior renovations to the West Tower and Plaza, including the addition of bollards, would have no adverse effect on the NRHP-eligible KOC or any archaeological resources;
- TVA's finding that the further developed plans for the West Tower lobby, café, and auditorium would have no adverse effect on the NRHP-eligible KOC;
- That the objects within the West Tower lobby and concourse levels of the KOC that are a part of TVA's Historic Collection are not eligible for listing in the NRHP, and thus transfer would not result in an effect to a historic property; and
- TVA's finding that a Phase II archaeological investigation for an anomaly identified in 2016 associated with site 40KN357 is no longer needed, now that no ground disturbing activities are proposed within the vicinity of the anomaly.

Pursuant to 36 CFR Part 800.3(f)(2) TVA is consulting with federally recognized Indian tribes regarding historic properties within the proposed project's APE that may be of religious and cultural significance and are eligible for the NRHP.

Please contact Hallie Hearnese in Knoxville by email, hahearnese@tva.gov with your comments.

Sincerely,



Michael S. Harle on Behalf of Clinton E. Jones
Manager
Cultural Compliance

HAH:ABM

Enclosures

cc (Enclosures):

Ms. Jennifer Barnett
Tennessee Division of Archaeology
1216 Foster Avenue, Cole Bldg. #3
Nashville, Tennessee 37210

References Cited

Heavrin, Elizabeth

- 2021 *Historic Architectural Resources Survey for the Proposed Plaza Renovations at the Knoxville Office Complex, Knox County, Tennessee*. Prepared by Cultural Resource Analysts, Inc. (CRA), Knoxville, Tennessee, for TVA, Knoxville, Tennessee.

National Park Service (NPS)

- 1997 *National Register Bulletin: How to Apply the National Register Criteria for Evaluation*. U.S. Department of the Interior, National Park Service, Cultural Resources, National Register, History and Education, Washington, D.C.

Patch, Shawn M., Robbie Jones, Sarah Lowry, Ashley Krauss, and Sydney Shoof

- 2016 *Archival Research and Geophysical Survey for Proposed Transfer of the Tennessee Valley Authority Knoxville Office Complex (KOC), Knox County, Tennessee*. Prepared by New South Associates, Stone Mountain, Georgia, for TVA, Knoxville.

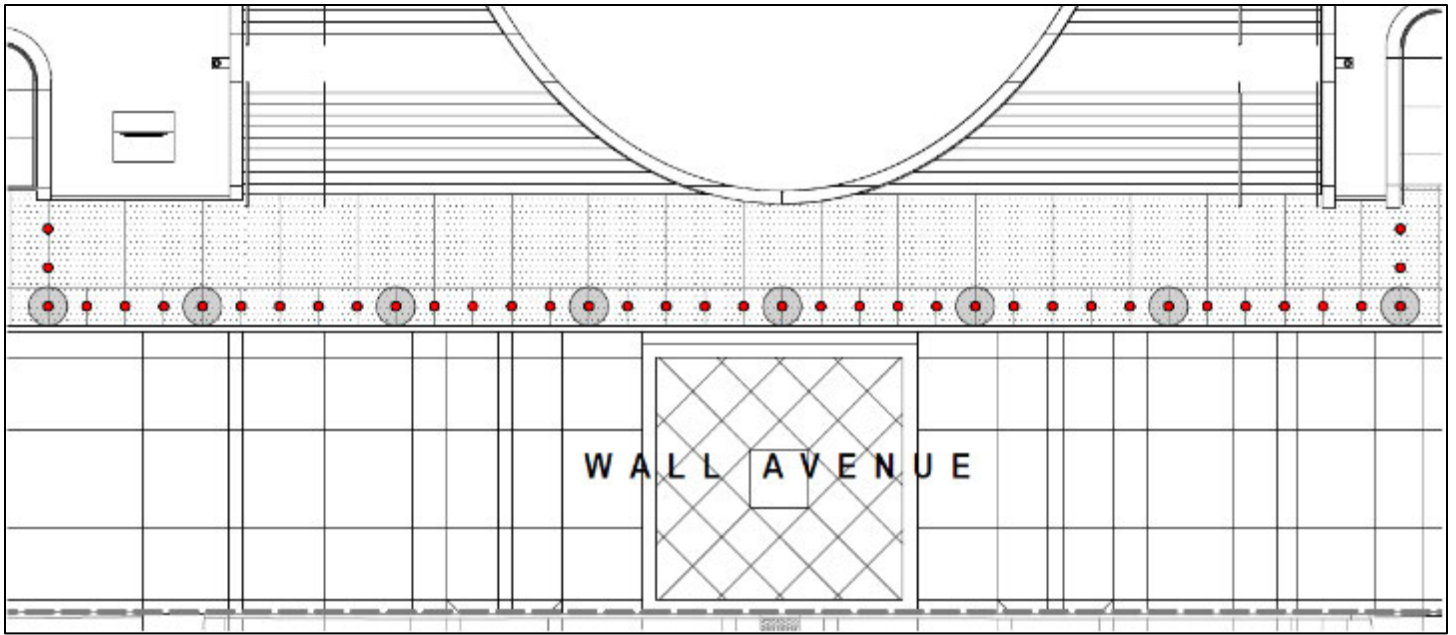


Figure 1. Plan view of proposed bollards on Wall Avenue.

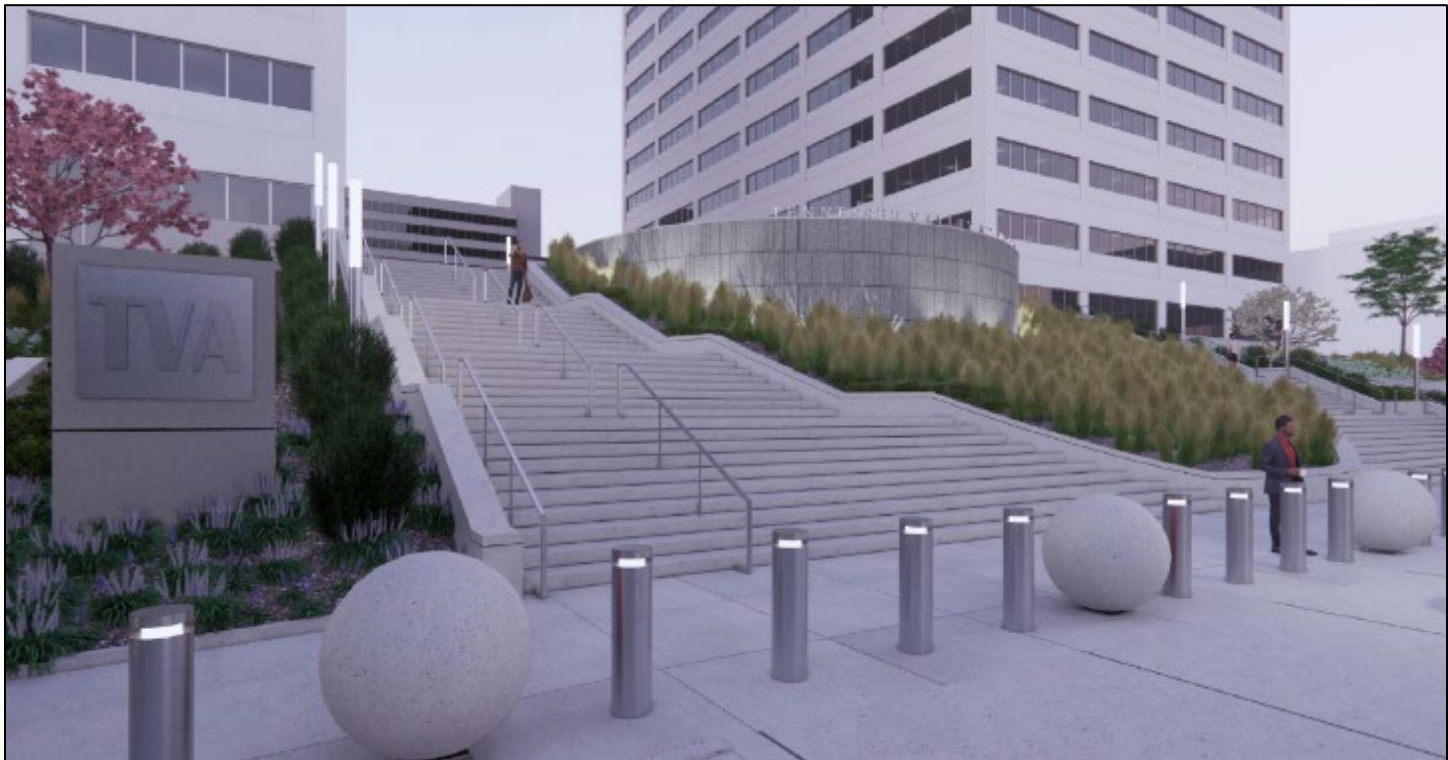


Figure 2. View of proposed bollards and KOC Plaza from Wall Avenue, facing north.



Figure 3. From Market Square across Wall Avenue, facing north-northwest.



Figure 4. From Wall Avenue, facing west-northwest.

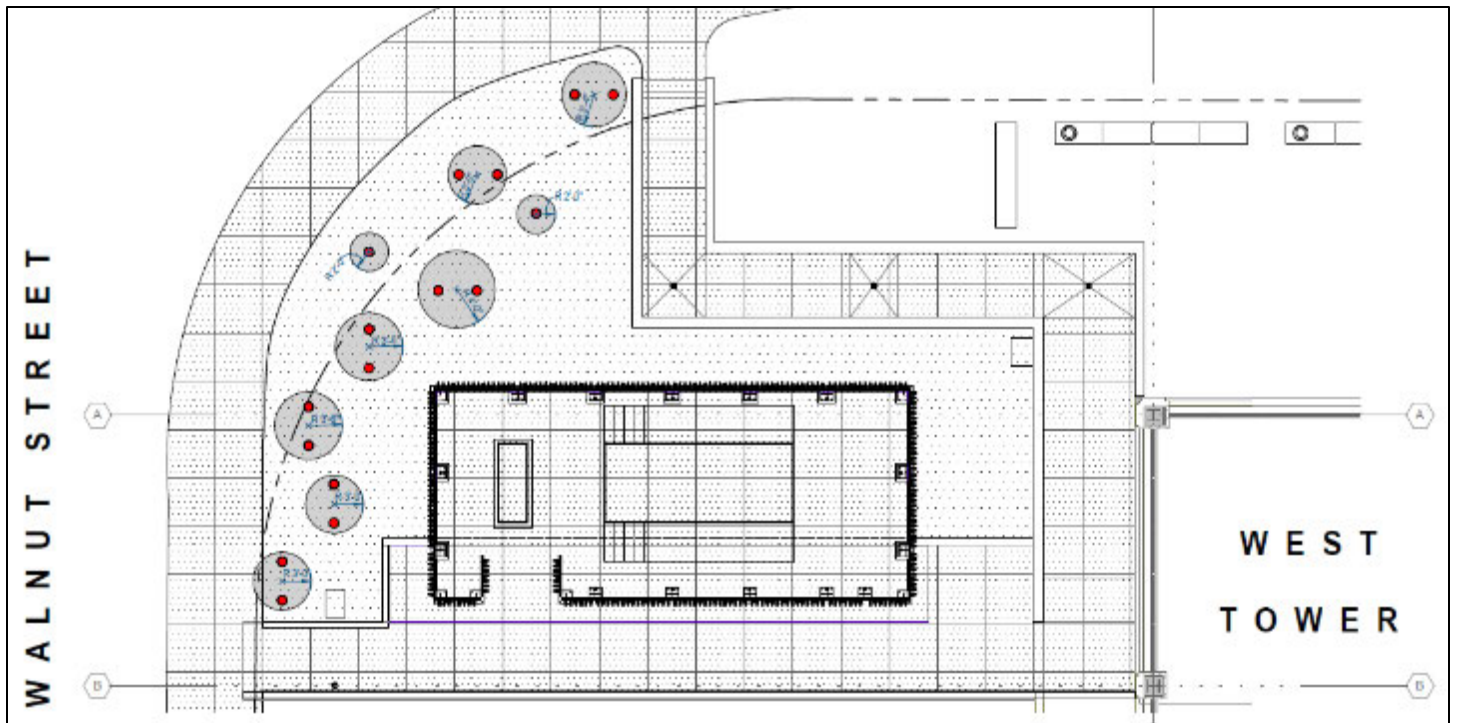


Figure 5. Plan view of proposed bollards at the corner of Walnut Street, near the KOC Emergency Generator.

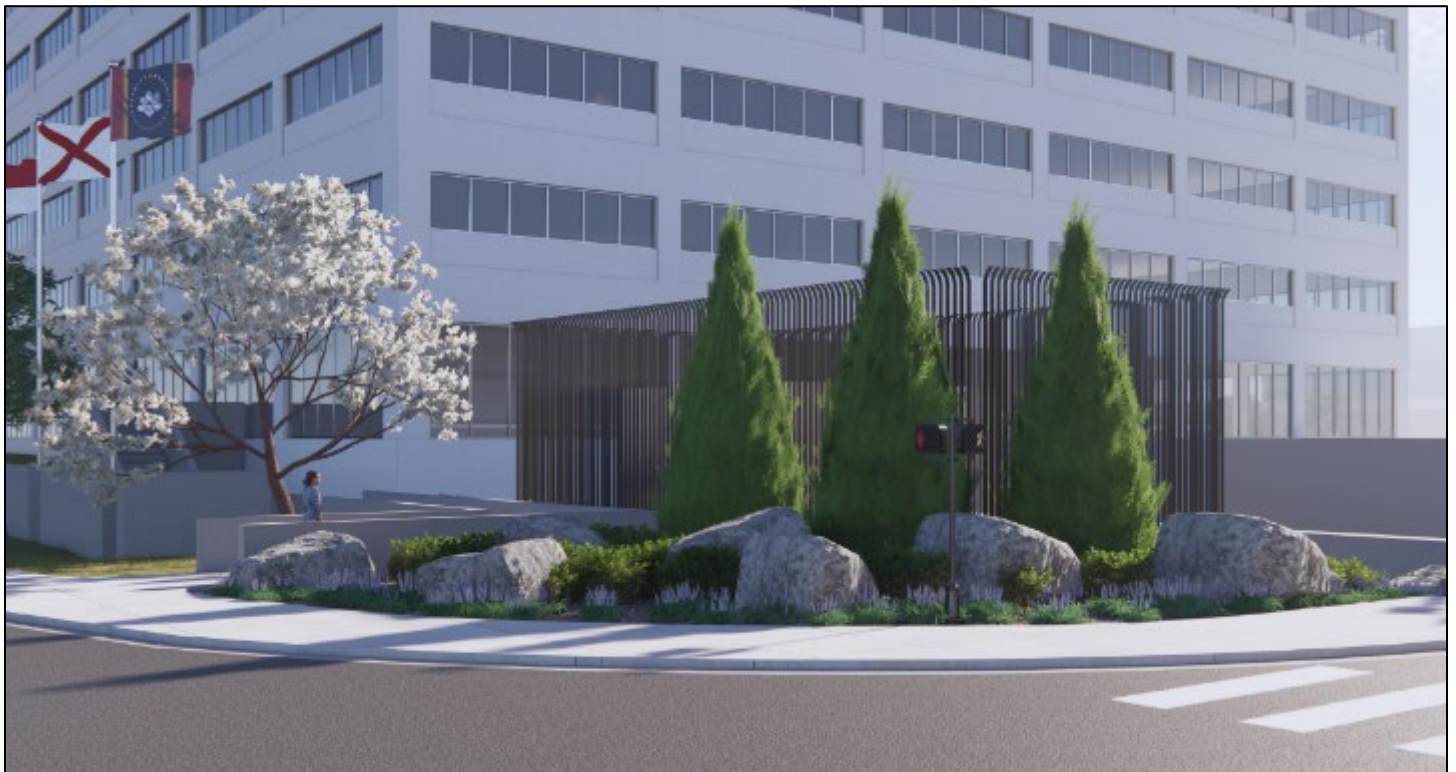


Figure 6. From the corner of Summit Hill and Walnut Street toward the KOC Emergency Generator and enclosure, facing east-southeast. This vegetation was included in previous consultation in 2019; however, now the design also includes bollards.



Figure 7. From West Summit Hill Drive toward KOC Emergency Generator and enclosure, facing south-southeast.

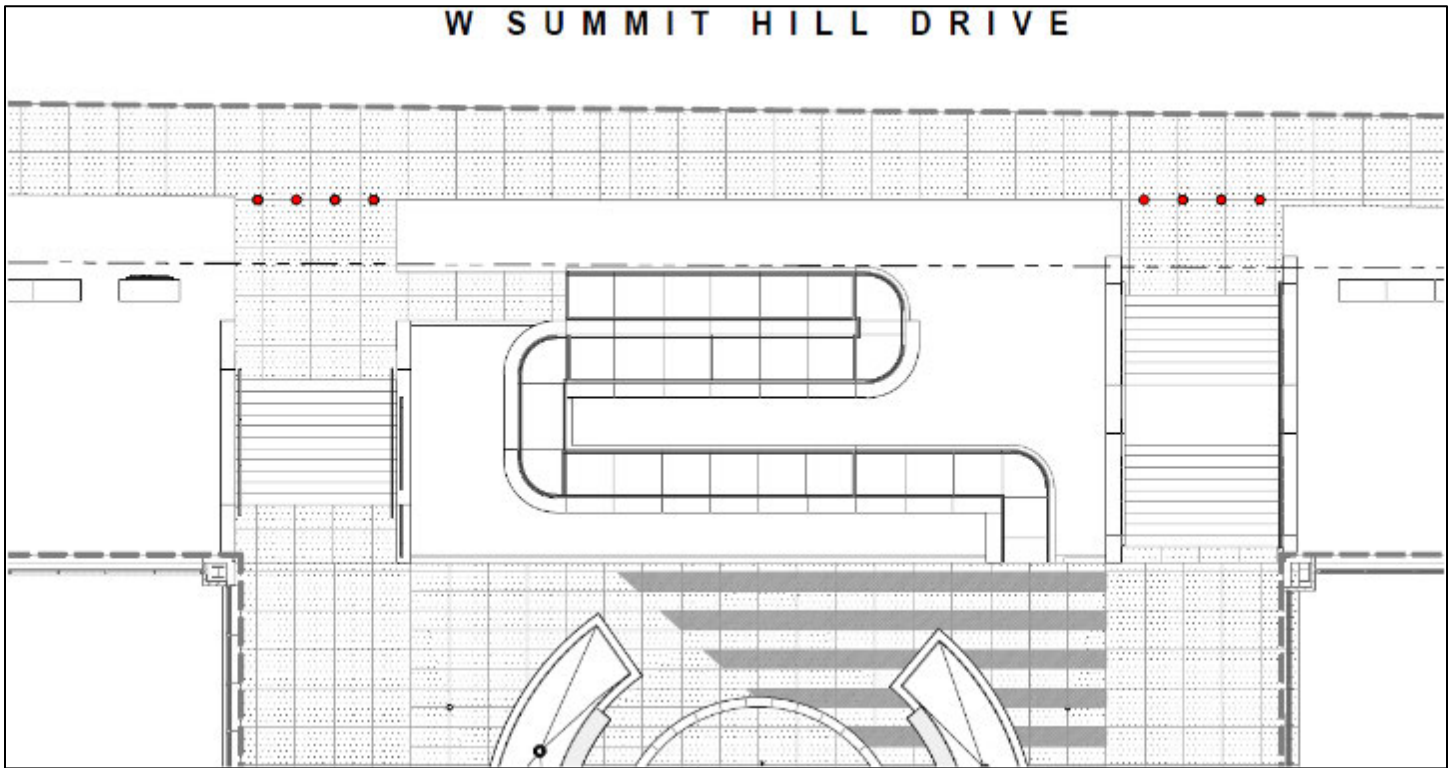


Figure 8. Plan view of proposed bollards at the entrance of the KOC Plaza from West Summit Hill Drive.



Figure 9. From West Summit Hill Drive toward Plaza and West Tower, facing south-southwest.



Figure 10. From West Summit Hill Drive toward Plaza, facing south.



Figure 11. From West Summit Hill Drive toward the East Tower, facing east-southeast.



Figure 12. Overview of the proposed West Tower lobby design including the reception desk and visitor space, facing west.



Figure 13. Overview of the proposed West Tower lobby design within the visitor section of the lobby toward the employee entrance and auditorium, facing northwest.

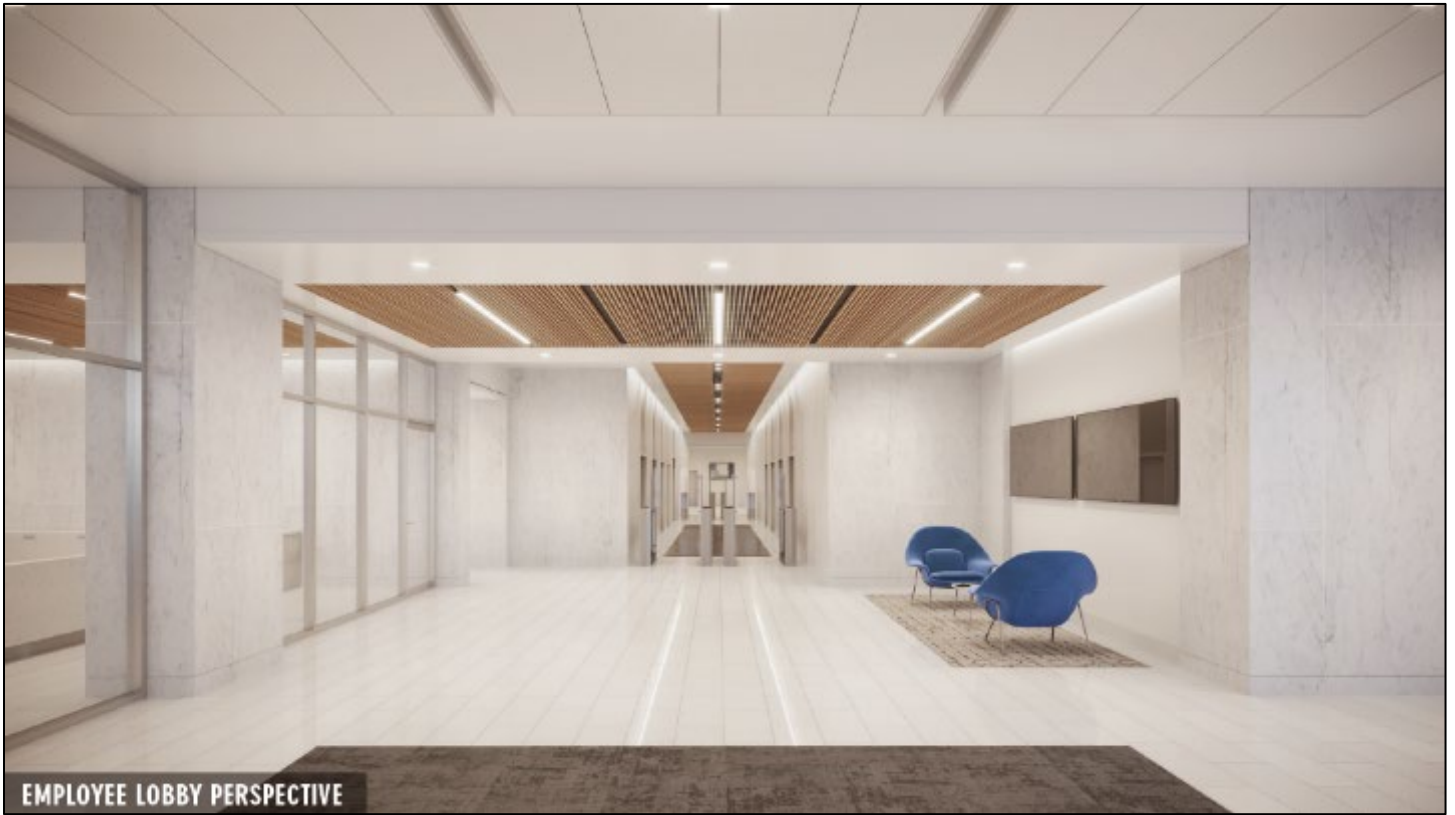


Figure 14. Overview of the proposed lobby design for the West Tower from the employee entrance toward the open elevator lobby, facing west.



Figure 15. Overview of the proposed design of the café in the KOC West Tower, facing west-northwest.



Figure 16. Overview of the proposed design of the KOC West Tower auditorium, facing southwest.



Figure 17. Artifact associated with the TVA Historic Collection, currently displayed in the KOC West Tower lobby.



Figure 18. Artifacts associated with the TVA Historic Collection, currently displayed on the Plaza Level (first floor) of the KOC West Tower.



Figure 19. Artifacts associated with the TVA Historic Collection, currently displayed in the West Tower lobby.



Figure 20. Artifact associated with the TVA Historic Collection, currently displayed in the West Tower lobby.



Figure 21. Artifacts associated with the TVA Historic Collection, currently displayed in the KOC Concourse.



Figure 22. Artifacts associated with the TVA Historic Collection, currently displayed in the KOC Concourse.



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April 30, 2021

Mr. Clinton E. Jones
Tennessee Valley Authority
400 West Summit Hill Drive
Knoxville, TN 37902

RE: TVA / Tennessee Valley Authority, Knoxville Office Complex; West Tower and Plaza Renovations/
CID 77028, Knoxville, Knox County, TN

Dear Mr. Jones:

We have reviewed the documents you submitted regarding your proposed undertaking. Our review of and comment on your proposed undertaking are among the requirements of Section 106 of the National Historic Preservation Act. You have submitted documents that are insufficient for us to complete our review. To continue the Tennessee State Historic Preservation Office review of this undertaking, please provide us with the following information:

1. More photographs of the plaza from the late 1970s/early 1980s. It would be helpful to have these historic images so we can better understand the original design of the plaza and what has been changed.
2. It would be helpful to organize the photographs in the report to show images (historic, current, and proposed design) of the same area of the plaza side-by-side.

We think it would be most helpful to visit the site and walk around the plaza while looking at the proposed design and historic images. If this is acceptable to you, please contact us so we can set up a day and time to meet to discuss the project and familiarize ourselves with the site.

Please be advised that until this office has provided you a final written comment on this undertaking, you have not met your Section 106 obligation under federal law. Questions and comments may be directed to Casey Lee (615 253-3163). We appreciate your cooperation.

Sincerely,

for: E. Patrick McIntyre, Jr.
State Historic Preservation Officer

Casey Lee
Historic Preservation Specialist/Coordinator
Section 106 Review and Compliance Program
Tennessee State Historic Preservation Office



400 West Summit Hill Drive, Knoxville, Tennessee 37902

May 4, 2021

Ms. Lindsay Crockett, AICP
Historic Zoning Planner
Knoxville-Knox County Planning
400 Main Street, Suite 403
Knoxville, Tennessee 37902

Dear Ms. Crockett:

TENNESSEE VALLEY AUTHORITY (TVA), PROPOSED WEST TOWER AND PLAZA RENOVATIONS, KNOXVILLE OFFICE COMPLEX (KOC), KNOX COUNTY, TENNESSEE (35.96637, -83.92021) (TVA TRACKING NUMBER – CID 77028)

TVA currently proposes to renovate the exterior of the West Tower, the interior lobby of both the East Tower and the West Tower, and the exterior between the East and West Towers of the Knoxville Office Complex (KOC). The KOC is located at 400 West Summit Hill Drive, in downtown Knoxville, Tennessee (36.96637; -83.92021) (see Figures 1 and 2 of the attached report).

TVA previously consulted with the Tennessee State Historic Preservation Officer (SHPO) regarding the redevelopment of TVA's KOC several times since October 2015. In our most recent consultation in May 2020, we determined that the proposed project had the potential for direct and visual effects to both archaeological and historic architectural resources, including the KOC. The proposed project plans have continued to develop and now indicate the anticipated limits of ground disturbance and all visual elements associated with the exterior design. The overall project design of the Plaza and Exterior of the KOC has not changed. However, details have been further refined, including the exact location of ground disturbance, the appearance of the elements within the plaza, the inclusion of revolving doors for enhanced security at the West Tower, and the need for bollards within the roadway to limit traffic at the southern edge of the TVA property. A full description of the proposed actions associated with the exterior and Plaza design is included in the attached report (Heavrin 2021). In addition to the alterations to the exterior design, the project also includes further detail on the design of the West Tower Plaza interior. The design now includes a separate visitor's lobby and waiting area, to provide additional security measures for TVA employees and contractors working on site. Furthermore, the interior plans do not incorporate the artifacts associated with TVA's Historic Collection that have been on display within the KOC since renovations in the 1990s.

Historic Architectural Survey for KOC Plaza and West Tower Exterior Renovations

Through consultation with the SHPO, TVA determined that the area of potential effects (APE) for this portion of the project consists of the exterior Plaza renovations (project area or footprint) and any historic properties adjacent to the KOC and within view of the proposed Plaza renovations (see Figures 1 and 2 of the attached report). TVA contracted with Cultural

Resource Analysts, Inc. (CRA) to complete the historic architectural resource survey in February and March of 2021 (Heavrin 2021). The report titled *Historic Architectural Resources Survey for the Proposed Plaza Renovations at the Knoxville Office Complex, Knox County, Tennessee* is attached for your review. CRA recorded five resources, evaluated the eligibility of each resource for listing in the National Register of Historic Places (NRHP), and assessed potential effects of the proposed project on historic properties. The five recorded resources include the NRHP-eligible KOC (including the adjacent Fritts Lot), Immaculate Conception Catholic Church (KN-1080), the NRHP-listed Market Square Commercial Historic District, and two previously undocumented commercial buildings located along Gay Street and southeast of the KOC. CRA recommends that the KOC remains eligible for listing in the NRHP under Criterion A and under Criterion Consideration G and that the Market Square Commercial Historic District remains eligible for listing in the NRHP under Criteria A and C. Additionally, CRA recommends that Immaculate Conception Church remains potentially eligible and that the two newly-recorded resources are not eligible. Further, CRA recommends that the proposed project design would result in a finding of no adverse effect. TVA has reviewed the report and agrees with CRA's recommendations. Thus, TVA finds that the exterior renovations to the West Tower and Plaza would result in no adverse effects to historic properties.

In March 2021, just after the completion of CRA's historic architecture survey, McCarty Holsaple McCarty provided the final design for the review of bollards to TVA. These additional bollards are required by TVA Police (TVAP) in order to ensure additional security to the KOC and bring it up to safety standards required for federal buildings. Bollards along Wall Avenue (Figures 1-4), along the corner of Walnut Street near the emergency generator (reviewed as a separate project with you in 2019) (Figures 5-7), and along West Summit Hill Drive (Figures 8-11) will provide additional barriers to deter penetration of vehicles and other threats to further increase security at the KOC. The revision and/or addition to bollards to the Plaza design would not diminish the integrity of any surrounding resources identified by CRA in their recent survey, including the KOC. Therefore, TVA finds that the revision of the design to include bollards would result in no adverse effects to historic properties.

West Tower Interior Renovations

As with the exterior and plaza plans, the interior renovation plans have further developed since our latest consultation on this project in May 2020 (Figures 12-16). As discussed in previous consultation, the finishes, light fixtures, security screening, and café and meeting spaces that extend from the lobby reflect renovations completed in the mid-1990s. Therefore, any changes to the finishes or furnishings of the lobby, café and auditorium of the West Tower would not result in a loss of historic material. Even with the updated designs for the lobby, which include a vestibule space for security and screening for entry, the vestibule features as many glass walls as possible. The floorplan continues to feature an open lobby with direct access to the central elevator lobby. Therefore, no character-defining features of the KOC would be affected by the proposed interior renovations to the lobby, café, and auditorium. Thus, TVA finds that interior renovations to the lobby of the West Tower will not result in an adverse effect to the KOC. As illustrated in the conceptual designs for the interior of the West Tower lobby, artifacts associated with TVA's Historic Collection are not incorporated into the new design. As a result,

TVA would like to transfer the items of the Historic Collection located within the West Tower lobby and concourse levels to another institution so that they can remain on display to the public.

TVA is currently reviewing options for the future of the TVA Historic Collection; however, no decisions have been made for the future of the entire collection. TVA will further consult with the SHPO on the larger management effort being considered for TVA's Historic Collection. Until options are determined regarding the larger collection, TVA currently proposes to remove items currently located within the concourse and lobby of the KOC from the Historic Collection (Figures 17-22). TVA is currently assessing options for the disposal of these objects either through temporary or permanent transfer to a museum to aid in telling the story of TVA's service to improve the lives of those living and working within the Tennessee Valley.

The majority of the historic collection is comprised of objects associated with TVA's history, research, and energy production. While these artifacts help illustrate TVA's historic past, they are small objects not designed for a specific location and/or are removed from their original setting and context. If the objects were once associated with hydroelectric project or other property listed in the NRHP, they no longer retain any context or understanding of the original resource, given their removal and display at the KOC, as a part of permanent displays. Thus, based on a review of the National Park Service (NPS) National Register Bulletin 15, they are unlikely to be eligible for listing in the NRHP as individual objects (NPS 1997:5). TVA finds that the artifacts currently displayed at the KOC are not eligible for listing in the NRHP; therefore, there are no effects to historic properties as a result of the transfer of these items from TVA's Historic Collection. Previous Section 106 agreement documents, developed in consultation with the SHPO and others, have stipulated the retention of items to be retained within TVA's Historic Collection. None of the items currently displayed in the KOC are tied to previous agreement documents.

Archaeological Resources

Any additional ground disturbance associated with the addition of bollards associated with the proposed design for the KOC Plaza would occur within areas previously surveyed in 2016 through ground-penetrating investigations as a part of previous reviews associated with this project (Patch, et. al 2016). The only anomaly recorded as a part of that survey was associated with Site 40KN357; no bollards are proposed within the vicinity of that location. Therefore, TVA finds that no archaeological resources would be affected by the addition of bollards at the KOC.

TVA previously consulted with the SHPO regarding a proposed scope of work for Phase II Archaeological testing to determine if an anomaly associated with site 40KN357, identified during previous ground-penetrating radar investigations (Patch, et. al 2016) retains sufficient integrity to be eligible for inclusion in the NRHP. Since our previous consultation in May 2020, the project plans have further developed and ground disturbance within the vicinity of the anomaly is no longer proposed. Therefore, TVA finds that no additional archaeological investigations are needed for site 40KN357, as it will not be affected by this proposed project.

Ms. Lindsay Crockett
Page 4
May 4, 2021

By this letter, TVA is seeking your comment on the following:

- TVA's finding that the proposed actions regarding the plaza and exterior renovations to the West Tower and Plaza, including the addition of bollards, would have no adverse effect on the NRHP-eligible KOC or any archaeological resources;
- TVA's finding that the further developed plans for the West Tower lobby, café, and auditorium would have no adverse effect on the NRHP-eligible KOC;
- That the objects within the West Tower lobby and concourse levels of the KOC that are a part of TVA's Historic Collection are not eligible for listing in the NRHP, and thus transfer would not result in an effect to a historic property; and
- TVA's finding that a Phase II archaeological investigation for an anomaly identified in 2016 associated with site 40KN357 is no longer needed, now that no ground disturbing activities are proposed within the vicinity of the anomaly.

Pursuant to 36 CFR Part 800.3(f)(2) TVA is consulting with federally recognized Indian tribes regarding historic properties within the proposed project's APE that may be of religious and cultural significance and are eligible for the NRHP.

Please contact Hallie Hearnese in Knoxville by email, hahearnese@tva.gov with your comments.

Sincerely,



Michael S. Harle on Behalf of Clinton E. Jones
Manager
Cultural Compliance

HAH:ABM
Enclosures

References Cited

Heavrin, Elizabeth

- 2021 *Historic Architectural Resources Survey for the Proposed Plaza Renovations at the Knoxville Office Complex, Knox County, Tennessee*. Prepared by Cultural Resource Analysts, Inc. (CRA), Knoxville, Tennessee, for TVA, Knoxville, Tennessee.

National Park Service (NPS)

- 1997 *National Register Bulletin: How to Apply the National Register Criteria for Evaluation*. U.S. Department of the Interior, National Park Service, Cultural Resources, National Register, History and Education, Washington, D.C.

Patch, Shawn M., Robbie Jones, Sarah Lowry, Ashley Krauss, and Sydney Shoof

- 2016 *Archival Research and Geophysical Survey for Proposed Transfer of the Tennessee Valley Authority Knoxville Office Complex (KOC), Knox County, Tennessee*. Prepared by New South Associates, Stone Mountain, Georgia, for TVA, Knoxville.

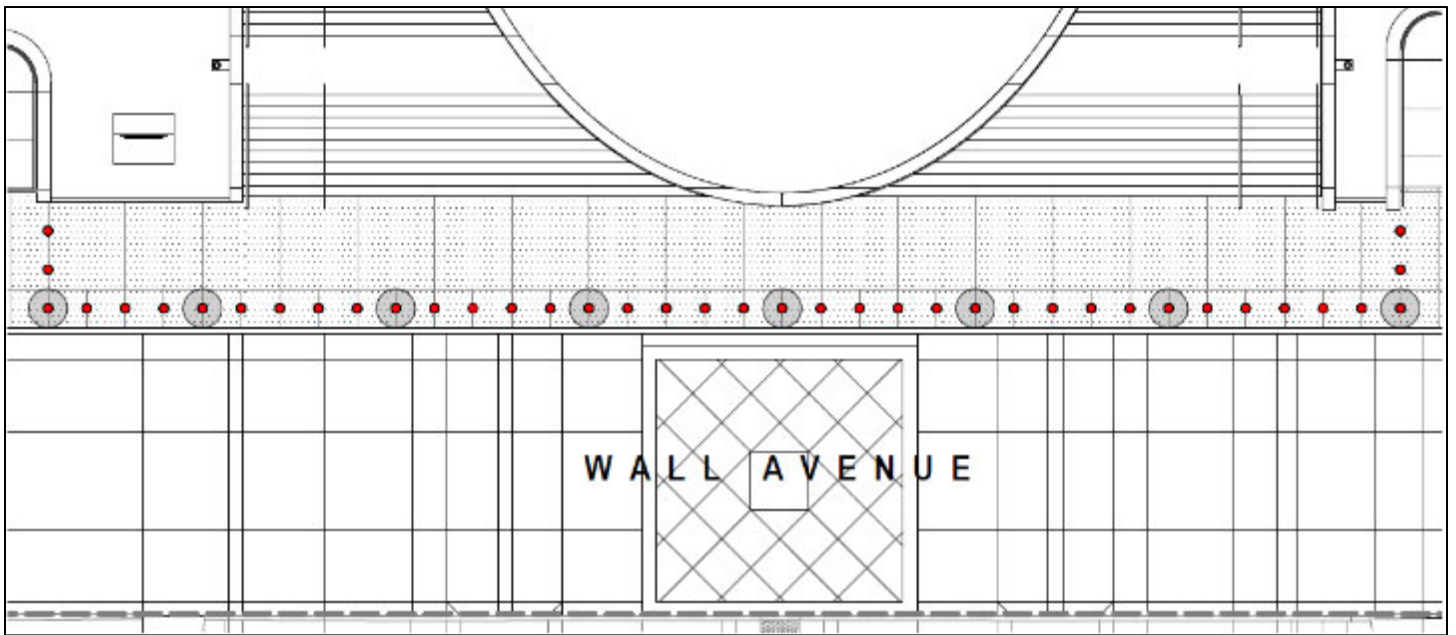


Figure 1. Plan view of proposed bollards on Wall Avenue.

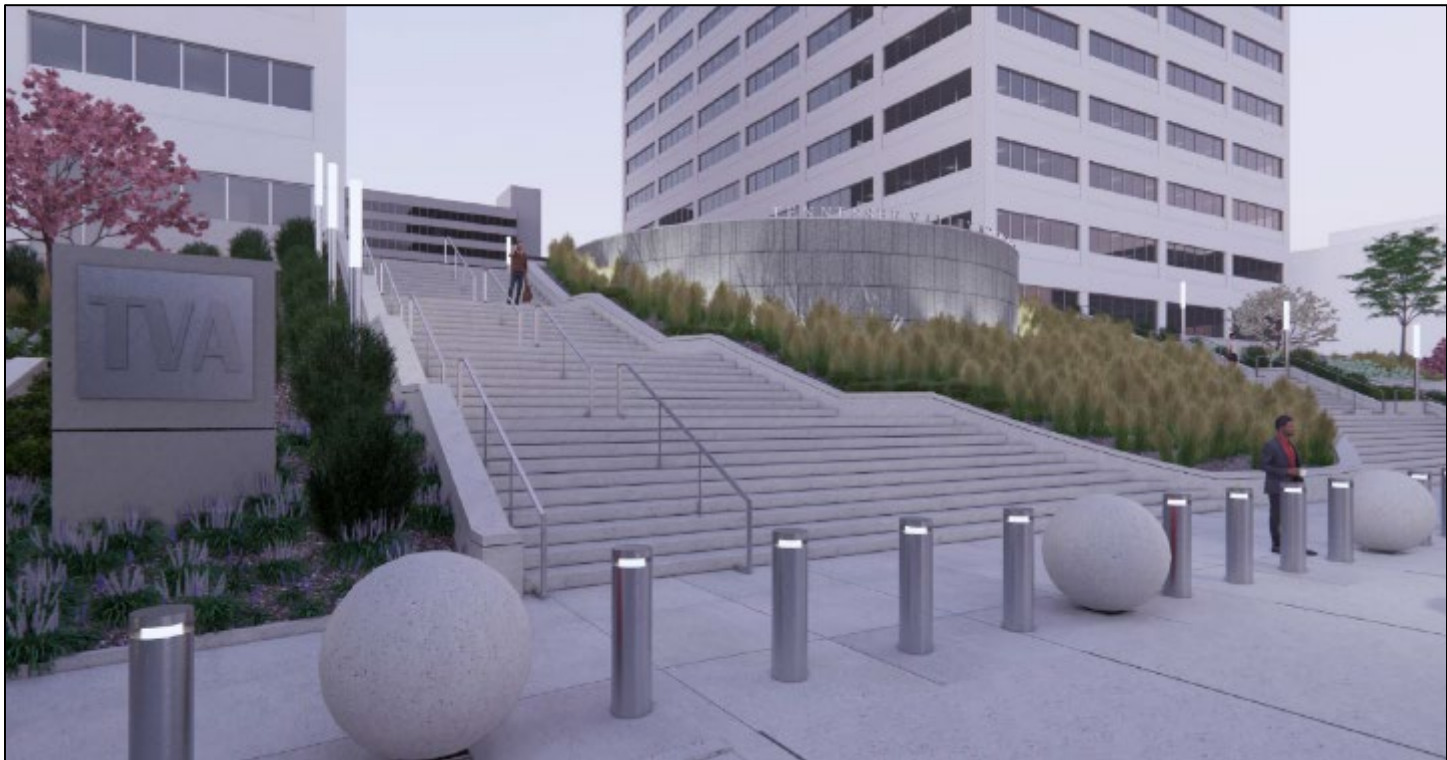


Figure 2. View of proposed bollards and KOC Plaza from Wall Avenue, facing north.



Figure 3. From Market Square across Wall Avenue, facing north-northwest.



Figure 4. From Wall Avenue, facing west-northwest.

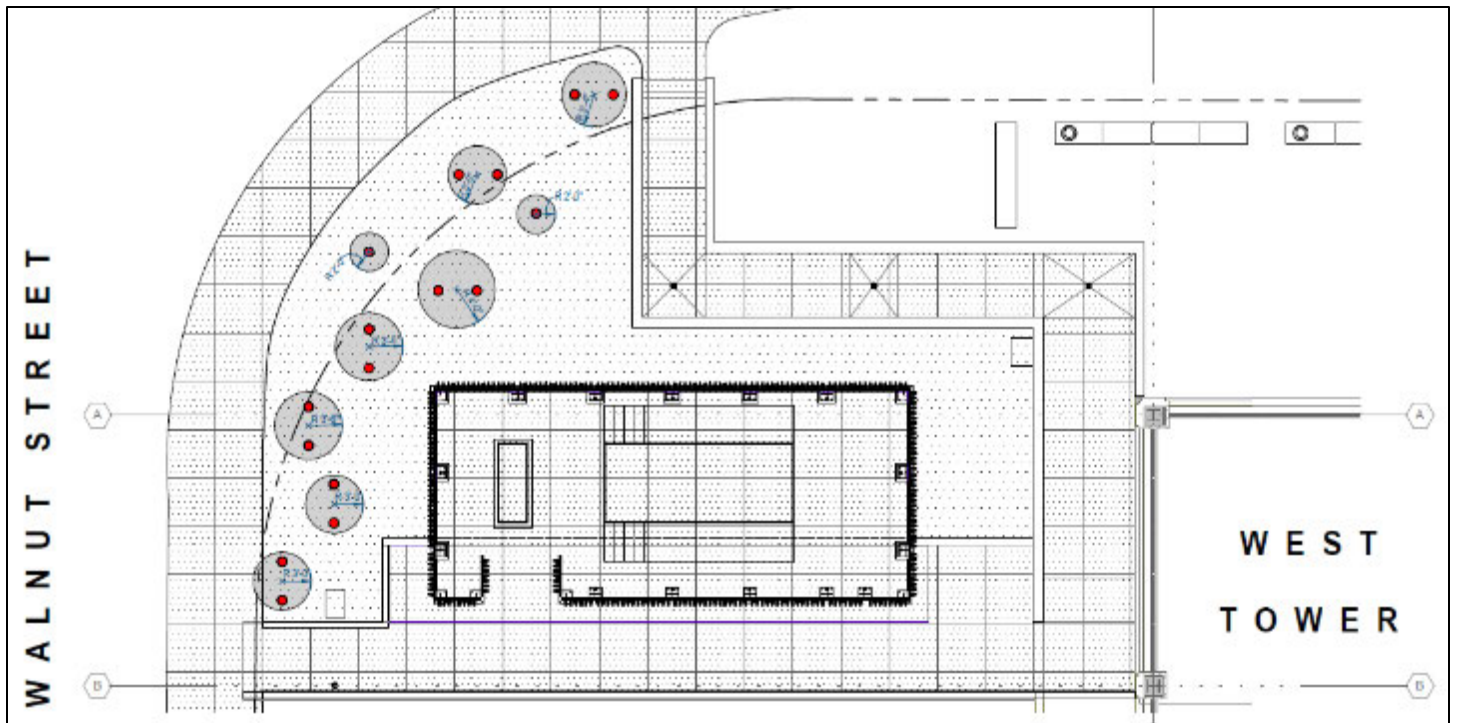


Figure 5. Plan view of proposed bollards at the corner of Walnut Street, near the KOC Emergency Generator.



Figure 6. From the corner of Summit Hill and Walnut Street toward the KOC Emergency Generator and enclosure, facing east-southeast. This vegetation was included in previous consultation in 2019; however, now the design also includes bollards.



Figure 7. From West Summit Hill Drive toward KOC Emergency Generator and enclosure, facing south-southeast.

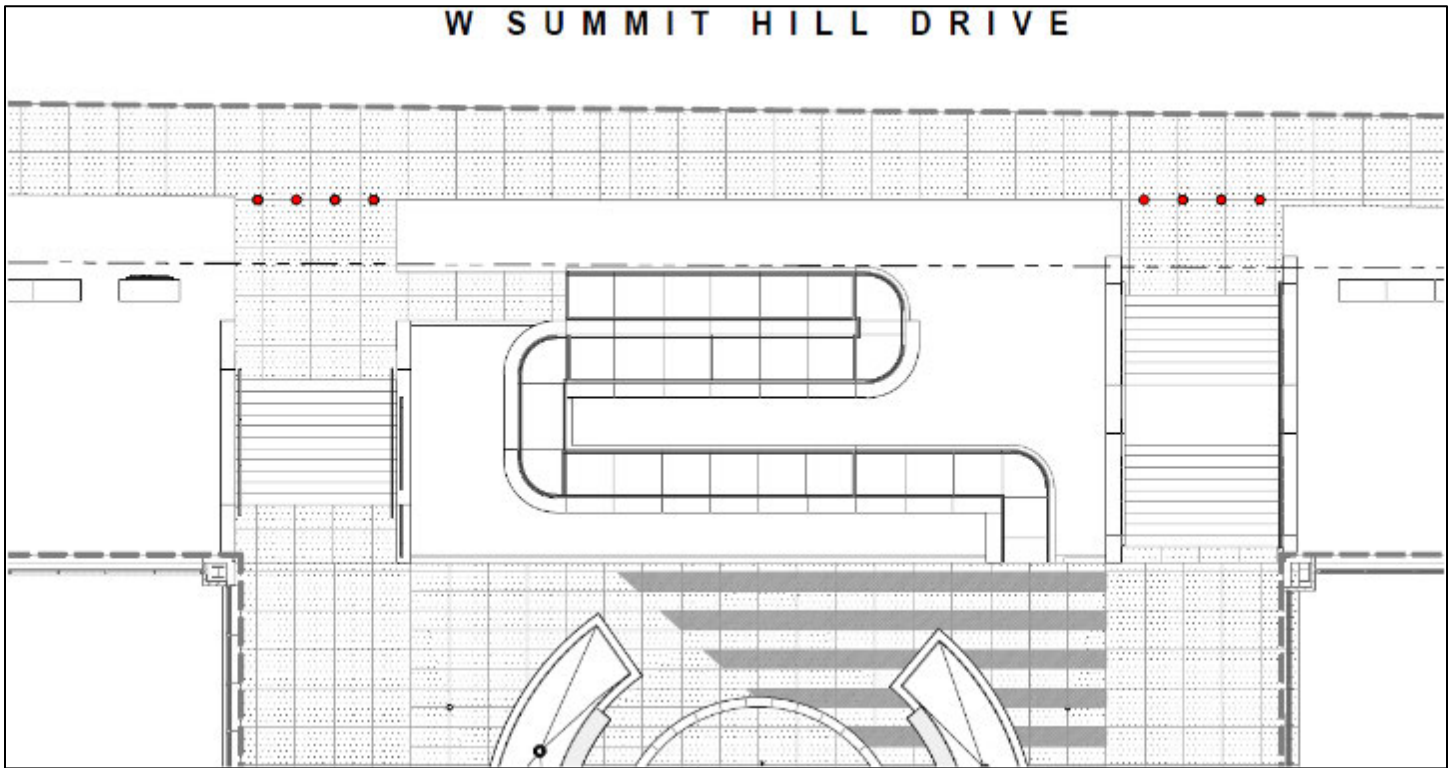


Figure 8. Plan view of proposed bollards at the entrance of the KOC Plaza from West Summit Hill Drive.



Figure 9. From West Summit Hill Drive toward Plaza and West Tower, facing south-southwest.



Figure 10. From West Summit Hill Drive toward Plaza, facing south.



Figure 11. From West Summit Hill Drive toward the East Tower, facing east-southeast.



Figure 12. Overview of the proposed West Tower lobby design including the reception desk and visitor space, facing west.



Figure 13. Overview of the proposed West Tower lobby design within the visitor section of the lobby toward the employee entrance and auditorium, facing northwest.

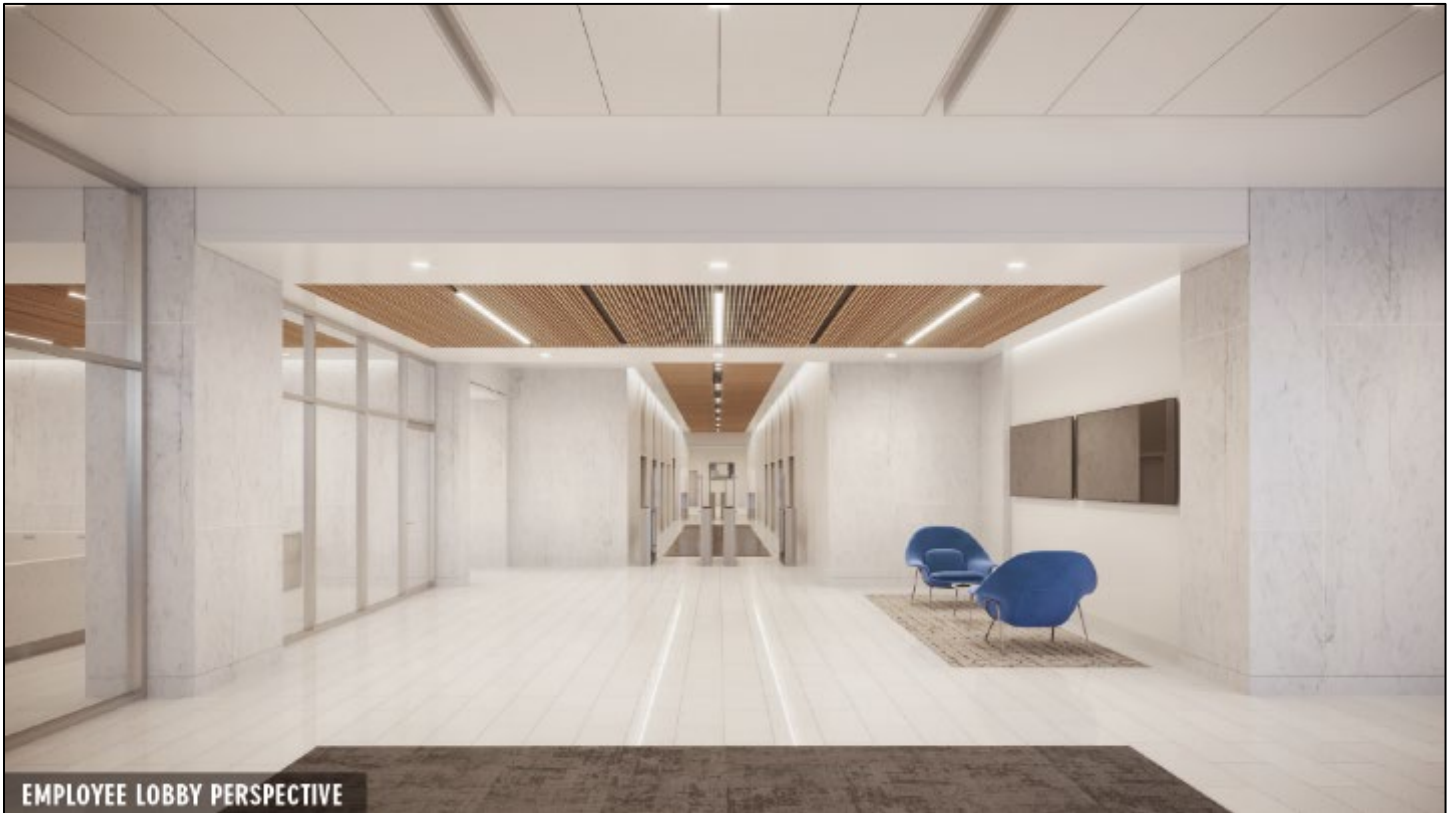


Figure 14. Overview of the proposed lobby design for the West Tower from the employee entrance toward the open elevator lobby, facing west.



Figure 15. Overview of the proposed design of the café in the KOC West Tower, facing west-northwest.



Figure 16. Overview of the proposed design of the KOC West Tower auditorium, facing southwest.



Figure 17. Artifact associated with the TVA Historic Collection, currently displayed in the KOC West Tower lobby.



Figure 18. Artifacts associated with the TVA Historic Collection, currently displayed on the Plaza Level (first floor) of the KOC West Tower.



Figure 19. Artifacts associated with the TVA Historic Collection, currently displayed in the West Tower lobby.



Figure 20. Artifact associated with the TVA Historic Collection, currently displayed in the West Tower lobby.



Figure 21. Artifacts associated with the TVA Historic Collection, currently displayed in the KOC Concourse.



Figure 22. Artifacts associated with the TVA Historic Collection, currently displayed in the KOC Concourse.



Memorandum

TO: Hallie Hearnese, Architectural Historian, Cultural Compliance
Tennessee Valley Authority

FROM: Lindsay Crockett, AICP, Historic Preservation Planner

DATE: May 5, 2021

SUBJECT: TVA Proposed West Tower and Plaza Renovations, Knoxville Office Complex,
TVA Tracking Number - CID 77028

ADDRESS: 400 West Summit Hill Drive, Knoxville, Tennessee 37902

STAFF COMMENTS:

Knoxville-Knox County Planning staff have evaluated the proposed West Tower and Plaza renovations at the Knoxville Office Complex (KOC) of the Tennessee Valley Authority, along with the results of the related 2021 Historic Architectural Resources Survey prepared by Cultural Resources Analysts, Inc. (CRA).

The major scope of work, the **proposed redesign of the Plaza and exterior renovations to the West Tower**, including the addition of bollards along Wall Avenue, Walnut Street, and Summit Hill Avenue, will increase accessibility and improve the pedestrian experience, especially from the adjacent Market Square. The project proposed to date will better align the plaza with its original design intent, dating to the early-to. The KOC has been determined eligible for the National Register of Historic Places (NRHP) under Criterion A, for association with the development of TVA and the revitalization of the adjacent Market Square. The KOC Plaza has been modified several times from the original design intent, including a significant renovation in the mid-1990s. Thus, the proposed project will have **no adverse effect on the NRHP eligibility of the KOC**. The proposed project will also have **no adverse effect on any NRHP-listed or NRHP-eligible properties in the APE**, including the Immaculate Conception Catholic Church and the Market Square Commercial Historic District, and **no adverse effect on any archaeological resources associated with the KOC**.

Additional details have been developed related to the **West Tower interior renovations**, including the lobby, café, and auditorium. As these will be limited to non-character-defining (previously modified, c.1990s) interior areas of the KOC, the proposed West Tower interior renovations will **have no adverse effect on the NRHP eligibility of the KOC**.

Planning staff have reviewed the provided documentation on the **TVA Historic Collection items** currently located within the West Tower lobby and concourse levels. These objects are **not eligible for listing in the NRHP** and the proposed undertaking **would not result in an affect to a historic property**.

Finally, as all ground disturbance will occur in urban areas that have been previously disturbed, a Phase II archaeological investigation for an anomaly associated with site 40KN357 is not necessary.

If any further comment or information is necessary to complete this review, please do not hesitate to reach out.

Thank you,



Lindsay Crockett, AICP
Historic Preservation Planner





400 West Summit Hill Drive, Knoxville, Tennessee 37902

July 30, 2021

Mr. E. Patrick McIntyre, Jr.
Executive Director
and State Historic Preservation Officer
Tennessee Historical Commission
State Historic Preservation Office
2941 Lebanon Pike
Nashville, Tennessee 37214

Dear Mr. McIntyre:

TENNESSEE VALLEY AUTHORITY (TVA), PROPOSED WEST TOWER AND PLAZA RENOVATIONS, KNOXVILLE OFFICE COMPLEX (KOC), KNOX COUNTY, TENNESSEE (35.96637, -83.92021) ADDITIONAL INFORMATION (TVA TRACKING NUMBER – CID 77028)

TVA received your response on April 30, 2021, in which you requested additional information regarding the above-cited project. Specifically, your office requested:

- more photographs of the plaza from the late 1970s/early 1980s to better understand the original design of the plaza and what has been changed;
- reorganization of the photographs in the report to show images (historic, current, and proposed design) of the same area of the plaza side-by-side; and
- a visit to the site to walk around the plaza while looking at the proposed design and historic images was also requested.

Following the receipt of your response, TVA requested a teleconference to discuss next steps needed to provide the requested information. On May 4, 2021, we met via teleconference to share additional resources identified since the fieldwork and to schedule a site visit to the KOC. TVA continued research to identify any additional sources of information or images of the plaza.

TVA also consulted with Lindsay Crockett, Historic Zoning Planner for Knoxville-Knox County Planning, as a consulting party on May 4, 2021. A copy of the letter submitted and her response are attached to this letter for your reference.

On May 20, 2021, TVA's Architectural Historian led a walk-through of the KOC plaza for Tennessee Historical Commission staff and provided a PowerPoint presentation titled "TVA's KOC Plaza." The presentation contained the following information:

- a summary of the project (as outlined in our previous letter dated April 20, 2021)
- a brief discussion regarding current limited access to the KOC and TVA Research Library due to COVID and flooding/restoration after flood event on the concourse and sublevels of the KOC

Mr. E. Patrick McIntyre, Jr.
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July 30, 2021

- all images of the KOC within the TVA Historic Photograph Collection, including detailed snips of photos to illustrate various components of the plaza for comparison
- a rendering of proposed redesign of the plaza dated November 1989 from the McClung Collection
- an article titled "New Knoxville towers safe and energy efficient," from *TVA Today* newsletter, January 1976
- an article titled "Teamwork brings 'value add' to KOC," from *Inside TVA* newsletter, January 9, 1996
- slides showing snips from all available aerial or other photographic imagery for comparison of each area (overall, from Market Square and Wall Avenue, and from Summit Hill Drive)
- a brief discussion of the East Tower Plaza Lobby proposed interior renovations (provided for reference, as you concurred on these plans as long as no character-defining features were to be affected)

We provided a printed copy of the PowerPoint to your staff during the walk-through. Given the large size of this presentation, it is too large to attach to this digital submission. We shared a digital copy (via hyperlink) with Kelley Reid and Casey Lee.

By this letter and the previous consultation associated with this project, TVA is seeking your comment on the following:

- TVA's finding that the proposed actions regarding the plaza and exterior renovations to the West Tower and Plaza, including the addition of bollards, would have no adverse effect on the National Register of Historic Places (NRHP)-eligible KOC or any archaeological resources;
- TVA's finding that the further developed plans for the West Tower lobby, café, and auditorium would have no adverse effect on the NRHP-eligible KOC;
- That the objects within the West Tower lobby and concourse levels of the KOC that are a part of TVA's Historic Collection are not eligible for listing in the NRHP; and
- TVA's finding that a Phase II Archaeological investigation for an anomaly identified in 2016 associated with site 40KN357 is no longer needed, now that no ground disturbing activities are proposed within the vicinity of the anomaly.

Please contact Hallie Hearnese in Knoxville by email, hahearnese@tva.gov, with your comments.

Sincerely,



Clinton E. Jones
Manager
Cultural Compliance

Mr. E. Patrick McIntyre, Jr.
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July 30, 2021

HAH:ABM

Enclosures

cc (Enclosures):

Ms. Jennifer Barnett
Tennessee Division of Archaeology
1216 Foster Avenue, Cole Bldg. #3
Nashville, Tennessee 37210



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www.tnhistoricalcommission.org

July 30, 2021

Mr. Clinton E. Jones
Tennessee Valley Authority
Biological and Cultural Compliance
400 West Summit Hill Drive
Knoxville, TN 37902

RE: TVA / Tennessee Valley Authority, Proposed West Tower and Plaza renovations, KOC, CID 77028, Knoxville, Knox County, TN

Dear Mr. Jones:

Pursuant to your request, this office has reviewed documentation concerning the above-referenced undertaking. Our review of and comment on your proposed undertaking are among the requirements of Section 106 of the National Historic Preservation Act. This Act requires federal agencies or applicants for federal assistance to consult with the appropriate State Historic Preservation Office before they carry out their proposed undertakings. The Advisory Council on Historic Preservation has codified procedures for carrying out Section 106 review in 36 CFR 800 (Federal Register, December 12, 2000, 77698-77739).

Based on the information provided, we find that the project area contains a cultural resource eligible for listing in the National Register of Historic Places. We further find that the project as currently proposed will not adversely affect the Knoxville Office Complex. We agree that the objects from the TVA Historic Collection within the lobby and concourse are not eligible for listing in the NRHP. We agree that the Phase II Archaeological investigation for 40KN357 is no longer needed.

This office has no objection to the implementation of this project as currently planned. If project plans are changed or previously unevaluated archaeological remains are discovered during project construction, please contact this office to determine what further action, if any, will be necessary to comply with Section 106 of the National Historic Preservation Act. Questions and comments may be directed to Kelley Reid (615-770-1099). We appreciate your cooperation.

Sincerely,

for: E. Patrick McIntyre, Jr.
State Historic Preservation Officer

Kelley Reid
Historic Preservation Specialist/Coordinator
Section 106 Review and Compliance Program
Tennessee State Historic Preservation Office