

**FINDING OF NO SIGNIFICANT IMPACT
(FONSI)**

**Tennessee State Veterans' Home Board
Tennessee Veterans' Homes
Arlington, Shelby County, Tennessee**

November 2020

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FINDING OF NO SIGNIFICANT IMPACT

Based on the October 2020 Environmental Assessment (EA) prepared for the proposed Tennessee State Veterans' Home at Arlington, Tennessee, the United States Department of Veterans Affairs (VA), and the Tennessee State Veterans' Home Board (TSVH) has determined that the proposed construction and operation of the veterans' home will not have a significant impact on the quality of the human environment. Therefore, an Environmental Impact Statement is not required.

BACKGROUND

The VA proposes to issue a grant to TSVH to construct the veterans' home in west Tennessee. The veterans' home plan is for a 126-bed facility to be located on an approximate 28.65-acre tract of state-owned property at 11293 Memphis Arlington Road, in Arlington, Tennessee. The entire tract is completely within the Town of Arlington corporate limits in Shelby County. The actual facility, access roads, and parking footprint would occupy most of the property.

A Draft EA was prepared in November 2019 and advertised for purposes of soliciting public input. Following receipt of agency and public input, the Draft EA was revised as needed and finalized.

SUMMARY OF THE PROPOSED ACTION

The Proposed Action would be located on a 28.65-acre property within a larger parent parcel of the former Arlington Developmental Center, a state-run center for the mentally and developmentally disabled, and currently the current Youth Villages' Dogwood Campus, a residential mental health treatment center for youth and the Tennessee Department of Intellectual and Developmental Disabilities' (TDIDD) West Tennessee Regional Office. The proposed veterans' home would not interfere with Dogwood Village or the TDIDD. The Proposed Action would be funded in part by the VA State Home Construction Grant Program (SHCGP). Subject to meeting the requirements of availability and approval of the design, the SHCGP will provide federal funding for preparation of the Draft Master Plan and construction of the Proposed Action.

The design goal of the Proposed Action includes an estimated 125,054-square foot (SF), 126-bed veteran's home. The proposed facility would have three main buildings. Two buildings would consist of six standard care residential houses and one special care house and would accommodate 18 residents per house. Design plans also include the option to accommodate construction of an additional residential house, as needed. The third building would include a central community center and various therapy and maintenance facilities. Other features of the Proposed Action would include a main entry, perimeter fencing, roadways and parking, a maintenance area, landscaping, irrigation, and site utilities. TSVH will design and construct the new facility in accordance with the Tennessee High Performance Building Requirements to promote sustainable Land Management, Water Efficiency, Energy Efficiency, Materials and Resources, Indoor Environmental Quality, and Innovations in Design and Construction.

The construction of the Proposed Action is estimated to last approximately 20 months and is anticipated to occur only during daytime hours. Construction would entail regrading portions of the Project Site, including the locations of proposed roadways and foundations. Structures would be constructed using conventional methods. Outdoor lighting fixtures are anticipated to comply with local guidelines and ordinances to minimize the effects of light pollution. Exposed areas of soil would be stabilized to avoid erosion, and final landscaping would finish construction.

Routine operation of the Proposed Action would include skilled levels of nursing care and facility/grounds maintenance. Staff and visitors to the facility would have access to visit throughout the day.

Measures to mitigate for the effects of potential negative impacts to resources are included in the EA and briefly summarized here. The use of best management practices will be required of contractors during construction phases, relative to air quality, geology and soils, hydrology and water quality, wildlife and habitat, as well as noise. Conformance with all permit requirements, applicable building codes, and the VA Master Construction Specifications is required by construction contractors with respect to these resource areas as described in the EA.

If subsurface deposits believed to be cultural or human in origin are discovered during construction, then all work must halt within a 100-foot radius of the discovery. Local law enforcement, the medical examiner, and the Tennessee Division of Archaeology must be notified immediately, and appropriate measures would be implemented to mitigate adverse impacts.

Public involvement for the EA included scoping letters to various local, state, and federal agencies to announce the EA. Subsequent public involvement included a public notice in the *Memphis Business Journal* to announce the Draft EA, and its availability for review at the Sam T. Wilson Public Library in Arlington. A 30-day public comment period began on November 15, 2019, and ended on December 15, 2019. The Draft EA was also available for download at the Tennessee Department of General Services website (<https://www.tn.gov/generalservices/real-estate-redirect-stream/strategic-real-estate-planning/environmental-assessments.html>). No comments on the Draft EA were received. The Final EA will be available for download at the Tennessee Department of General Services website (<https://www.tn.gov/generalservices/real-estate-redirect-stream/contractors/requests-for-information--rfi-1.html>).

Based on the October 2020 Tennessee State Veterans' Home at Arlington EA, it has been determined that the Proposed Action will not have a significant impact on the quality of the human environment. Therefore, an Environmental Impact Statement is not required.

FINAL ENVIRONMENTAL ASSESSMENT REPORT

SBC680/006-01-2014
TENNESSEE STATE VETERANS' HOME — ARLINGTON
11293 MEMPHIS ARLINGTON ROAD
ARLINGTON, TENNESSEE 38002
FAI# 47-018

EnSafe Project Number:
0888823477

Prepared for:

Tennessee State Veterans' Homes
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EXECUTIVE SUMMARY

PURPOSE AND NEED OF THE PROPOSED ACTION

The Proposed Action comprises the funding, construction and operation of the Tennessee State Veterans' Home in Arlington, Tennessee by the U.S. Department of Veterans Affairs (VA). The purpose of the Proposed Action is to provide high quality skilled nursing care to eligible veterans in the West Tennessee area. Currently, there are four Tennessee State Veterans' Homes, located in Clarksville, Humboldt, Knoxville, and Murfreesboro. A fifth Tennessee State Veterans' Home is scheduled to be constructed in Cleveland, Tennessee in December 2021. The Tennessee State Veterans' Home at Arlington is intended to augment the number of skilled nursing care facilities available to the current population of approximately 66,000 veterans in Shelby, Fayette and Tipton Counties of West Tennessee.

PROPOSED ACTION

The VA proposes to issue a grant to Tennessee State Veterans' Homes to locate and operate the new skilled nursing facility on a 28.65-acre portion of an approximately 417-acre state-owned property, formerly developed as the Arlington Developmental Center, located in Arlington, Shelby County, Tennessee. The Project Site and surrounding areas are shown in Figures 1 and 2.

The design goal of the Proposed Action includes an estimated 125,054-square foot, 126-bed skilled nursing facility within the Project Site. Appendix A depicts the conceptual layout of the Proposed Action. The Proposed Action includes the construction of a 3-building housing complex, main entrance, parking and roadways, perimeter fencing, utilities, landscaping and irrigation system. Environmental or societal impacts realized as a result of the Proposed Action are addressed in this environmental assessment (EA).

NO ACTION ALTERNATIVE

Under the No Action Alternative, VA would not approve the grant and the Tennessee State Veterans' Homes would not implement the Proposed Action. The current level of skilled nursing facilities available to eligible veterans in the West Tennessee area would remain unchanged, with the exception of the forthcoming Cleveland Veterans' Homes located in southeast Tennessee. Under this alternative, eligible veterans would continue to utilize the Veterans Homes located in Clarksville, Humboldt, Knoxville, and Murfreesboro and may have access to the Cleveland Veterans Home, once construction is complete. The No Action Alternative would avoid short-term adverse impacts associated with construction of Proposed Action and would avoid the long-term, adverse impacts associated with operation of Proposed Action. However, the No Action Alternative would not realize the minor, beneficial impacts associated with construction of the Proposed Action on socioeconomics.

ENVIRONMENTAL ASSESSMENT

The purpose of an EA is to ensure that decision makers consider a variety of environmental and societal impacts when deciding whether to proceed with a Proposed Action or alternatives to a Proposed Action. Alternative locations for the Proposed Action were considered in Shelby County Tennessee during the initial scoping of the Proposed Action (Real Estate Strategy Group 2014). However, these alternative locations were ultimately eliminated by the Tennessee State Veterans' Homes due to unfavorable terms of land acquisition, unfavorable topography for the siting of a facility, unfavorable flooding occurrence, and/or a very limited area for shallow excavation. This EA evaluates the Proposed Action and No Action Alternative, and was prepared to provide sufficient evidence and analysis to determine whether the Proposed Action results in significant impacts to affected resources, thus requiring the preparation of an environmental impact statement (EIS).

This EA evaluated impacts to each of the resources areas in two phases: during construction and during normal operations for the facility. The Proposed Action may create short-term (lasting during construction) or long-term (greater than 5 years) impacts affecting various resources areas associated with the Proposed Action. This EA uses the following terms in assessing impacts:

No Impact: A resource would not be affected, or the impacts would be at or below the level of detection (negligible), and changes would not result in any measurable or perceptible consequences.

Minor Short-Term: Impacts on a resource would be detectable for a short period, typically during construction, would be localized, and of minor consequence to the sustainability of the resource. Mitigation measures, if needed to offset adverse short-term effects, would be simple and achievable.

Minor Long-Term: Impacts on a resource would be readily detectable for a period of typically more than 5 years, measurable and associated with the operation of the Proposed Action. Mitigation measures, if needed to offset adverse long-term effects, would be extensive and achievable, and more extensive than those for minor short-term.

Significant: Impacts on a resource would be obvious, long-term, and would have substantial consequences on a regional scale. Mitigation measures, if needed to offset adverse significant effects, would be extensive. Significant impacts would warrant an EIS to further assess the impacts to affected resources as a result of the Proposed Action.

DETERMINATION

This EA describes the following resource areas and assesses the potential for the Proposed Action to affect these resources areas: aesthetics, air quality; cultural resources; geology and soils; hydrology and water quality; wildlife and habitat; noise; land use; floodplains and wetlands; socioeconomics and environmental justice; solid waste and hazardous materials; transportation and parking; utilities and

community service. This EA also assesses the potential incremental impacts of the Proposed Action when added to the cumulative impacts resulting from projects that are proposed, under construction, recently completed, or anticipated to be implemented in the reasonably foreseeable future.

The Proposed Action would result in both short-term (construction) and long-term (operation) impacts to resources. However, no significant impacts to any resource area are anticipated. As a result of the Proposed Action, the following determinations of impacts were made:

No Impact: The Proposed Action was determined to have negligible impact on the following resource areas: cultural resources; environmental justice; solid waste and hazardous materials; transportation and parking; and utilities and community service.

In addition, there are no known or anticipated issues likely to generate substantial controversy among the stakeholders, regulatory agencies, or the public, during construction or operation of the Proposed Action. Therefore, no impact is anticipated. Accordingly, a detailed examination of the potential for generating substantial controversy has been omitted from this EA.

Minor Short-Term: The Proposed Action was determined to have minor, short-term adverse impacts on the following resource areas due to construction: aesthetics; air quality; geology and soils; hydrology and water quality; wildlife and habitat; noise; land use; and floodplains and wetlands. In addition, minor, short-term beneficial impacts due to construction was determined for socioeconomics.

Minor Long-Term: The Proposed Action was determined to have minor, long-term adverse impacts on the following resource areas due to the long-term operation of the Proposed Action: air quality; wildlife and habitat; and land use. In addition, minor, long-term beneficial impacts due to operation of the Proposed Action were determined for socioeconomics.

Significant: No significant impacts were identified in this EA.

FINDING OF NO SIGNIFICANT IMPACT

Implementation of the Proposed Action as described would not constitute a major federal action that would have significant impact upon the quality of the human environment within the meaning of Section 102(2)(C) of NEPA of 1969. This EA concludes that a Finding of No Significant Impact (FONSI) is appropriate, and that an EIS is not required.

1.0 INTRODUCTION

1.1 Project Background

The U.S. Department of Veterans Affairs (VA) proposes to issue a grant to Tennessee State Veterans' Homes (TSVH) to locate a new veterans' home facility on property located in the Town of Arlington, Shelby County, Tennessee, approximately 27 miles northeast of Memphis, Tennessee (Project Site). The Project Site is state-owned and formerly operated as the Arlington Developmental Center from 1968 until it was demolished in 2014. It is located between the Arlington Sports Complex and a pond to the north, forested land to the south and east, and Elm Park Street to the west. The Project Site location and boundaries are shown in Figures 1 and 2.

The TSVH will manage the 28.65-acre Project Site. This, combined with TSVH approval of a federal grant application through the VA, is the action prompting compliance with the National Environmental Policy Act of 1969 (NEPA). NEPA established an entity within the Executive Office of the President to oversee NEPA implementation: The Council on Environmental Quality (CEQ). CEQ's regulations (40 Code of Federal Regulations [CFR] Parts 1500-1508) set the standard for NEPA compliance. CEQ's regulations require agencies to create their own NEPA implementing procedures. These procedures must meet the CEQ standard while reflecting each agency's unique mandate and mission. The VA's NEPA implementing regulations are codified in the Federal Register at 38 CFR Part 26.

Funding and construction of the proposed facility constitute the Proposed Action. Initial funding for design of the master plan is provided from the operating budget of TSVH; construction will be funded by the VA's State Home Construction Grant Program (SHCGP), subject to meeting the requirements of availability and approval of the design. Funding and construction is anticipated to begin in 2020.

The facility master plan and design process will be compliant with TSVH and VA SHCGP requirements and guidelines, and other applicable VA design criteria. The grounds and facility will be designed for year-round operation. Appendix A depicts the conceptual layout of the Proposed Action.

Although the lead agency for an environmental assessment (EA) is usually a federal agency, the VA defers the preparation of the EA to TSVH. VA retains the responsibility to determine whether to sign the Finding of No Significant Impact (FONSI).

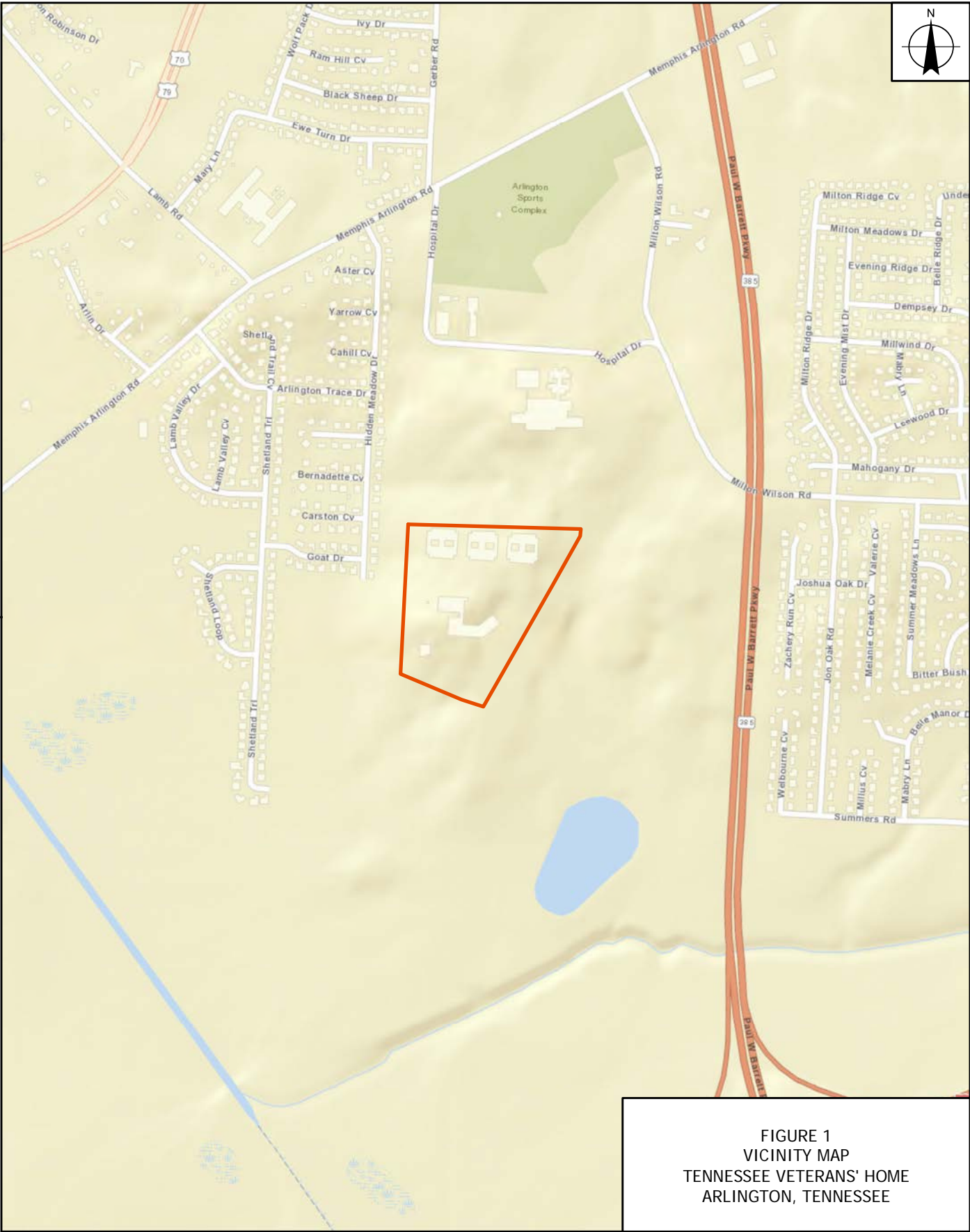
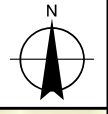


FIGURE 1
VICINITY MAP
TENNESSEE VETERANS' HOME
ARLINGTON, TENNESSEE

LEGEND

 SUBJECT PROPERTY BOUNDARY

NAD 1983 STATE PLANE
TENNESSEE FEET

0 500 1,000

SCALE IN FEET

REQUESTED BY: JG
DRAWN BY: MS
DATE: 9/10/2018
PROJECT: 0888823477



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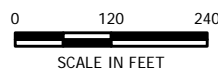
FIGURE 2
 SITE MAP
 TENNESSEE VETERANS' HOME
 ARLINGTON, TENNESSEE

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LEGEND

 PROPOSED ACTION SITE BOUNDARY

NAD 1983 STATE PLANE
 TENNESSEE FEET



REQUESTED BY:	JG
DRAWN BY:	MS
DATE:	9/10/2018
PROJECT:	0888823477

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1.2 Purpose and Need

The mission of the TSVH is to provide quality of care and quality of life for Tennessee's veterans. The purpose of the Proposed Action is to provide additional high-quality skilled nursing facilities to eligible veterans. The need is generated by the current population of approximately 66,000 veterans in Shelby, Fayette and Tipton Counties of West Tennessee, as published by the West Tennessee Veterans Home, Inc. (<http://www.veterans-home.com>). The Tennessee State Veterans' Home at Arlington is intended to augment the skilled nursing care facilities available to the current population of veterans in Tennessee. The VA design goal for Proposed Action is to provide an approximate 126-bed facility (Orcutt | Winslow 2019). The proposed facility and its 28.65 acres would help serve that need between the Nashville and Memphis areas.

1.3 Environmental Assessment

NEPA requires federal agencies to evaluate and consider environmental impacts for projects that utilized federal funding. The level of documentation required depends on the level of impacts. A categorical exclusion is for minor actions that have been previously determined to have no significant environmental impact. An EA is used to determine if a federal action would result in significant impact upon the quality of the human environment. An environmental impact statement (EIS) is prepared for federal action that have been determined through an EA to have significant impact upon the quality of the human environment. The VA determined that an EA is the appropriate level of documentation for the construction and operation of the proposed new veterans' home facility in Arlington, Tennessee.

1.4 Agency Coordination and Public Involvement

As part of the EA process, agency scoping letters were mailed to federal, state, and local agencies on February 5, 2019. The list of agencies contacted and scoping letters are presented in Appendix B. These letters provided details about the Project Site and Proposed Action, and requested agency input regarding the Proposed Action with respect to their jurisdiction and/or expertise. Agency response letters and correspondence received are included in Appendix B. Federally recognized tribes with ancestral interests in this location were invited by VA to consult on this project; no responses were received.

A Notice of Availability (NOA) of the draft EA was published in the *Memphis Business Journal* on November 15 through 22, 2019. The draft EA was available for a 30-day public review and comment period at the Sam T. Wilson Public Library in Arlington following publication of the NOA. The Draft EA was also available for download at the Tennessee Department of General Services website (<https://www.tn.gov/generalservices/real-estate-/redirect-stream/strategic-real-estate-planning/environmental-assessments.html>) to facilitate public access. No comments on the Draft EA were received.

2.0 PROPOSED ACTION AND ALTERNATIVES

NEPA requires that environmental consequences associated with the Proposed Action and the alternative to the Proposed Action be identified in this document. This section describes the two alternatives evaluated in this document: the Proposed Action Alternative and the No Action Alternative. Also included in this section is a discussion of the alternatives considered but eliminated from further consideration.

2.1 Proposed Action Alternative

Under the Proposed Action, VA would issue a grant under which TSVH would oversee the master planning, construction, and operation of a new veterans' skilled nursing facility in Arlington, Tennessee.

2.1.1 Proposed Facility

The Proposed Action would be located on a 28.65-acre property located within the parent parcel of the former Arlington Developmental Center, a state-run center for the mentally and developmentally disabled, and the current Youth Villages' Dogwood Campus, a residential mental health treatment center for youth and the Tennessee Department of Intellectual and Developmental Disabilities' (TDIDD) West Tennessee Regional Office. The Project Site is located approximately one-half mile north of the Interstate 40-Interstate 269 (State Route 385, Paul Barrett Parkway) interchange, in Arlington, Tennessee. Site access would be gained from Elm Park Street.

The anticipated boundary of the Proposed Action is shown on Figures 1 and 2. Figure 3 shows the conceptual layout of the Proposed Action (additional design details are presented in Appendix A). The Proposed Action would be funded in part by the SHCGP. Subject to meeting the requirements of availability and approval of the design, the SHCGP will provide federal funding for preparation of the Draft Master Plan and construction of the Proposed Action.

The design goal of the Proposed Action includes an estimated 125,054-square foot (SF), 126-bed veteran's home (Orcutt | Winslow 2019). The proposed facility would have three main buildings. Two buildings would consist of six standard care residential houses and one special care house and would accommodate 18 residents per house. Design plans also include the option to accommodate construction of an additional standard care residential house, as needed. The third building would include a central community center and various therapy and maintenance facilities. Other features of the Proposed Action would include a main entry, perimeter fencing, roadways and parking, a maintenance area, landscaping, irrigation, and site utilities. TSVH will design and construct the new facility in accordance with the Tennessee High Performance Building Requirements to promote sustainable Land Management, Water Efficiency, Energy Efficiency, Materials and Resources, Indoor Environmental Quality, and Innovations in Design and Construction.



ELM PARK STREET



FIGURE 3
PRELIMINARY COMPOSITE SITE PLAN LAYOUT
PROPOSED TENNESSEE VETERANS' HOME
ARLINGTON, TENNESSEE

LEGEND

 SUBJECT PROPERTY BOUNDARY

NAD 1983 STATE PLANE
TENNESSEE FEET
0 120 240
SCALE IN FEET

REQUESTED BY: JG
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DATE: 6/3/2019
PROJECT: 0888823477

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X:\DGS\VeteransHome\Arlington\Fig3\ Preliminary Map\V2.mxd

Source: Plan layout based on conceptual image from Orcutt | Winslow (2019) ; Google Earth Pro Imagery - 03/14/2018

2.1.2 Construction

The construction of the Proposed Action is estimated to last approximately 20 months and is anticipated to occur only during daytime hours. Heavy equipment utilized during the construction of the Proposed Action could include road graders, dump trucks, loaders, roller-compactors, excavators, backhoes, bulldozers, and paving equipment. Construction would entail regrading portions of the Project Site, including the locations of proposed roadways and foundations. Following installation of utility infrastructure such as electricity and water, structure foundations would be poured, and roads would be paved. Structures would be constructed using conventional methods. Outdoor lighting fixtures are anticipated to comply with local guidelines and ordinances to minimize the effects of light pollution. Exposed areas of soil would be stabilized to avoid erosion, and final landscaping would finish construction.

2.1.3 Operation and Maintenance

Routine operation of the Proposed Action would include skilled levels of nursing care and grounds maintenance, such as mowing grass and watering vegetation. Staff and visitors to the facility would have access to visit throughout the day.

2.2 No Action Alternative

Under this alternative, VA would not issue a grant for TSVH to undertake the Proposed Action in any form or construct a facility. The current level of skilled nursing facilities available to eligible veterans would remain unchanged. Under this alternative, veterans would continue to utilize the veterans' homes at the four current locations, a forthcoming fifth location in Cleveland, Tennessee, or use private facilities.

2.3 Alternatives Considered but Eliminated

Several additional locations were initially considered by TSVH for the Proposed Action but were eliminated ultimately from consideration based on several site evaluation factors. A *Potential Site Study* completed by Real Estate Strategy Group Inc. in 2014 includes the site evaluation factors used to determine an acceptable site for a Tennessee State Veterans' Home or Veterans' Community Living Center. The study is included as Appendix C. Sites were ranked according to site evaluation factors, summarized below:

- Sites that are appropriate for residential use, and in proximity to viable downtown or commercial centers.

- Sited that exhibit no obvious negative environmental influences, which cannot be corrected or acceptably mitigated.
- Consideration of other environmental factors such as wetlands, wild and scenic rivers, prime agricultural soils, historic districts, and lead paint.
- Consideration of occupied sites. Funding for relocation costs associated with occupied sites is not available from the VA or State of Tennessee.
- Sites that are served by municipally-owned water supply, as well as a storm and sanitary sewer system, adequate to serve the number of units.
- Sites of a reasonable size and configuration to permit acceptable and professional site planning with adequate open space, circulation, parking, and align with the scale of the current and proposed adjacent land uses.
- Sites that have sufficient frontage on a paved thorough fare to allow for signage, lighting, landscaping, ingress and egress, adequate visual separation from other adjacent uses. Areas of concern include difficult left-hand turns against prevailing traffic, and excessive curb cuts surrounding the development.
- Proximity to sites that are in proximity to dumps, salvage yards, heavy industrial uses, blighted areas, etc. will be rejected.

3.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

Section 3 of the EA describes the natural and human environments that exist within the Project Site and the potential impacts of the Proposed Action. Impacts can be defined as either beneficial or adverse and can vary in magnitude. The impacts of the Proposed Action would include the construction and long-term operation of the facility on the 28.65-acre Project Site. The Proposed Action may create short-term (lasting during construction) or long-term (greater than 5 years) impacts. For this EA, the magnitude of impacts will generally be classified as follows:

No Impact: A resource would not be affected, or the impacts would be at or below the level of detection (negligible), and changes would not result in any measurable or perceptible consequences.

Minor Short-Term: Impacts on a resource would be detectable for a short period, typically during construction, would be localized, and of minor consequence to the sustainability of the resource. Mitigation measures, if needed to offset adverse short-term effects, would be simple and achievable.

Minor Long-Term: Impacts on a resource would be readily detectable for a period of more than 5 years, measurable and associated with the operation of the Proposed Action. Mitigation measures, if needed to offset adverse long-term effects, would be more extensive than those for short-term, and achievable.

Significant: Impacts on a resource would be obvious, long-term, and would have substantial consequences on a regional scale. Mitigation measures, if needed to offset adverse significant effects, would be extensive. Significant impacts would warrant an EIS to further assess the impacts to affected resources as a result of the Proposed Action.

This EA describes the following resource areas and assesses the potential for the Proposed Action to affect these resources areas: aesthetics, air quality; cultural resources; geology and soils; hydrology and water quality; wildlife and habitat; noise; land use; floodplains and wetlands; socioeconomics and environmental justice; solid waste and hazardous materials; transportation and parking; utilities and community service. This EA also assesses the potential incremental impacts of the Proposed Action when added to the cumulative impacts resulting from projects that are proposed, under construction, recently completed, or anticipated to be implemented in the reasonably foreseeable future.

In addition, there are no known or anticipated issues likely to generate substantial controversy among the stakeholders, regulatory agencies, or the public, during construction or operation of the Proposed Action. Therefore, no impact is anticipated. Accordingly, a detailed examination of the potential for generating substantial controversy is not included in this EA.

3.1 Aesthetics

The term aesthetics refers to the subjective visual perception of an area's natural beauty based on some qualitative scenic qualities. Factors typically included in a determination of aesthetic values include site characteristics such as topographic relief; prominence of water in the viewscape; type of vegetation present; diversity of scenery; level of human development or disturbance in the area; and presence or absence of any unique scenic features compared with surrounding land. Oftentimes, landscapes with greater diversity of features are considered to be of higher scenic quality. This section examines the impacts of the Proposed Action on aesthetics.

3.1.1 Existing Environment

As described in Section 2, approximately 28.65 acres of ground disturbance would occur as a result of the Proposed Action. The design goal provided by TSVH would include construction of a 126-bed intermediate and skilled nursing facility. The Project Site exhibits a moderate level of aesthetic quality, with no major unique features found on the Project Site. The general area associated with the Proposed Action has been modified by previous human activities, including the construction of the former Arlington Developmental Center in 1968, demolition of those facilities in 2014, and the current Youth Villages' Dogwood Campus and the TDIDD West Tennessee Regional Office. The Proposed Action is planned on an area of land that formerly included housing and worksite structures/maintenance buildings, paved and unpaved driveways.

Topography at the Project Site ranges from approximately 290 feet above mean sea level (amsl) to 320 feet amsl. A pond associated with the former Arlington Development Center is located approximately 70 feet north of the Project Site (Figure 3). Features surrounding the Project Site that contribute to the visual character and scenic quality of the area wooded areas that adjoin the Project Site to the east, west and south. Elm Park Street adjoins the western portion of Project Site (Figure 3).

Due to the density of trees along the eastern, western and southern property boundary, the closest residences located east and west of the Project Site would not have a direct line of sight to the Project Site. Perimeter fencing is proposed along the property that would primarily serve as a separation between the Youth Villages' Dogwood Campus property and the Project Site.

According to the U.S. Department of Transportation Federal Highway Administration, National Scenic Byways Program, there are no designated scenic roadways in the project vicinity. According to the, Interagency Wild & Scenic Rivers Coordinating Council and National Park Service Nationwide Rivers Inventory databases, there are no designated wild and scenic rivers or rivers included on the property or in the project vicinity.

Light pollution (obtrusive or unwanted nighttime lighting) is a side effect of human-occupied areas. Sources of nighttime light at the Project Site may include entrance, parking, and security lighting. The proposed lighting will comply with local guidelines and ordinances to minimize the effects of light pollution.

3.1.2 Environmental Consequences

3.1.2.1 Proposed Action

As described in Section 2, the Proposed Action would consist of a skilled nursing facility for veterans. The Project Site is vacant and cleared of buildings associated with the former Arlington Development Center. Due to the proposed site design and minimal site preparation required, there would be minimal impacts to the current aesthetic appearance of the Project Site. During the construction phase of the Proposed Action the appearance of the Project Site would change from bare land, grasses, and scattered shrubs to a manicured facility landscape. The Proposed Action would not significantly alter the visual quality of the Project Site and the surrounding land uses or interfere with existing views of the topography and the horizon from public viewpoints.

The adverse impacts to aesthetics during the construction of the Proposed Action are considered minor and short-term. The long-term operation of the Proposed Action would not substantially degrade the existing visual character or quality of the Project Site and its surroundings. The adverse minor impacts to aesthetics are not considered significant; therefore, no mitigation measures would be required.

3.1.2.2 No Action Alternative

Under the No Action Alternative, no construction would occur and there would be no changes in current aesthetics.

3.2 Air Quality

Since 1963, the Clean Air Act (CAA) and subsequent amendments have provided the authority and framework for the US Environmental Protection Agency (EPA) to regulate emission sources and establish requirements for the monitoring, control, and documentation of activities that will affect ambient concentrations of certain pollutants that may endanger public health or welfare. This section examines the impacts of the Proposed Action on air quality.

3.2.1 Existing Environment

In accordance with the CAA, the EPA has set National Ambient Air Quality Standards (NAAQS) for six categories of pollutants, known as “criteria pollutants” considered harmful to public health and the environment. They are particulate matter less than ten and two and a half microns in diameter (PM10 and PM2.5), sulfur dioxide, nitrogen dioxide, ozone, carbon monoxide and lead. The CAA identifies two types of NAAQS. Primary standards provide public health protection, including protecting the health of sensitive populations such as asthmatics, children, and the elderly. Secondary standards provide public welfare protection, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings. The NAAQS are available at the EPA website: <https://www.epa.gov/green-book>.

The EPA classifies the air quality in a designated area according to whether the concentrations of criteria pollutants in ambient air exceed the NAAQS. Areas are designated as either “attainment,” “nonattainment,” “maintenance,” or “unclassified” for each of the six criteria pollutants. Attainment means that the air quality within an area is better than the NAAQS. Nonattainment indicates that criteria pollutant levels exceed NAAQS. Maintenance indicates that an area was previously designated nonattainment but is now attainment. An unclassified air quality designation means that there is not enough information to classify an area appropriately, so the area is considered to be in attainment. The Proposed Action is located in Shelby County, which is in attainment for all criteria air pollutants (EPA 2018).

Requirements to reduce greenhouse gases (GHGs) are also applicable for federal actions. GHG emissions trap heat in the atmosphere and are generated by natural processes and human activities. The most common GHGs emitted from human activities include carbon dioxide, methane, and nitrous oxide. GHGs are primarily produced by the burning of fossil fuels and through industrial and biological processes. The EPA has issued a final rule for mandatory GHG reporting from large GHG emissions sources in the US. In general, the threshold for reporting is 25,000 metric tons or more of carbon dioxide equivalent GHG emissions per year; however, that excludes mobile source emissions such as those generated during construction activities.

The VA has published a Climate Change Adaption Plan (VA 2014) to address Executive Order (EO) 13653 and an annual Strategic Sustainability Performance Plan (VA 2016) to address EO 13514 (revoked by EO 13639 on March 19, 2015). These plans fulfill the requirements of the EOs by mitigating for the impacts of climate change and incorporating an adaptation strategy to reduce GHG emissions.

3.2.2 Environmental Consequences

3.2.2.1 Proposed Action

There would be short-term, minor impacts on air quality associated with the Proposed Action, related to criteria air pollutant generation in the form of fugitive dust (PM₁₀) and mobile source emissions and traffic to and from the Project Site. Heavy equipment used during construction would include road graders, dump trucks, loaders, roller-compactors, excavators, backhoes, bulldozers, grading, and paving equipment. Heavy equipment would be used for grading and for construction of the structures. The construction of the new nursing facilities is projected to be completed in approximately 20 months; however, construction requiring heavy equipment would be intermittent and would vary from day to day depending on meteorological conditions such as wind or rain. The Proposed Action does not include a boiler, incinerator, or other operations requiring an air emissions permit.

Adverse long-term impacts to air quality from the construction of the Proposed Action would result from a minor increase in GHG emissions due to limited clearing of vegetation on the Project Site. However, extensive tree-clearing is not proposed.

Adverse impacts to air quality from the operation of the Proposed Action would include an increase in GHG emissions associated with onsite personnel, residence and visitor vehicle trips, and from maintenance activities, such as mowing. Adverse impacts on air quality due to operation of the Proposed Action would be long-term but are considered minor.

The Proposed Action is expected to have minor adverse impacts on air quality. The impacts to air quality due to the construction and operation of the Proposed Action are not expected to exceed the NAAQS threshold levels, GHG emissions standards or significantly impact the air quality of Shelby County. Best management practices (BMPs) will be used to control fugitive dust and air emissions and mitigate for the minor impacts to air quality due to construction of the Proposed Action as described in Section 4.2.

3.2.2.2 No Action Alternative

Under the No Action Alternative, no construction would occur and there would be no changes in air quality.

3.3 Cultural Resources

“Cultural resources” is an umbrella term for many heritage related resources, including prehistoric and historic archaeological sites, buildings, structures, districts, or certain objects. Cultural resources are discussed in terms of archaeological resources, architectural resources, or resources of traditional cultural significance. This section examines the impacts of the Proposed Action on cultural resources.

3.3.1 Existing Environment

Under NEPA, federal cultural resource laws are applicable in evaluating the Proposed Action including the National Historic Preservation Act (NHPA). The National Register of Historic Places (NRHP) is the official list of the properties in the US that are significant in terms of prehistory, history, architecture, or engineering. The NRHP is administered by the National Park Service. Generally, resources must be more than 50 years old to be considered eligible for the NRHP. To meet the evaluation criteria for eligibility to the NRHP, a property needs to be significant under one or more NRHP evaluation criteria (36 CFR Part 60.4) and retain historic integrity expressive of the significance. More recent structures might be eligible for listing in the NRHP if they are of exceptional importance or if they have the potential to gain significance in the future per special NRHP considerations.

Section 106 of the NHPA requires a federal agency official to take into account the effects of its undertaking on historic properties, and oftentimes is coordinated with the Advisory Council on Historic Preservation, an independent federal agency. The Section 106 review requires an assessment of the potential impact of an undertaking on historic properties that are within the Proposed Action. A summary of the regional and local cultural history is provided below for reference.

The Project Site is currently vacant and predominantly maintained grassland with sporadic trees. Wooded areas exist on the western, northern, and eastern portions. The Project Site included buildings associated with the former Arlington Developmental Center from 1968 to 2014. Past construction and demolition activities at the site have significantly altered the area. It is unlikely that undisturbed cultural resources remain and would be adversely impacted at the site.

The State Historic Preservation Office (SHPO) and the Tennessee Historical Commission (THC) were contacted during the preparation of the EA. Related correspondence are included in Appendix B. The responses, which includes historical and cultural aspects, indicates the Project Site is not eligible for the NRHP and the Proposed Action will not adversely affect any property that is eligible for listing in the NRHP. Additionally, given the former structures and the nature of the Project Site, the project is unlikely to affect significant archaeological resources.

3.3.2 Environmental Consequences

3.3.2.1 Proposed Action

The VA design goal for Proposed Action is to provide an approximate 126-bed facility on an approximate 28.65-acre site (Orcutt | Winslow 2019). Earthmoving activities have previously occurred on the Project Site related to previous development activities. The Proposed Action would be largely limited to further earthmoving and construction activities.

SHPO and THC were consulted as part of the cultural resources evaluation. The responses provided indicated that the Proposed Action will not adversely affect any property that is eligible for listing in the NRHP, and unlikely to affect significant archaeological resources. As such, no impact to cultural resources is expected because of the Proposed Action. In the event that human remains or cultural resources are exposed during the Proposed Action, all work in that particular location must stop at once under state law. Local law enforcement, the medical examiner, and THC must be notified immediately. These mitigation measures are also specified in Section 4.2.

3.3.2.2 No Action Alternative

Under the No Action Alternative, no construction would occur and there would be no changes to cultural resources.

3.4 Geology and Soils

This section describes the affected environment, including surface topography, soils and underlying geologic formations that are present within the Project Site. A review of published soil survey data and geological information has been used to develop this section. This section also examines the impacts of the Proposed Action on prime or unique farmlands.

3.4.1 Affected Environment

The Project Site is located in eastern Shelby County, Tennessee, on disturbed soils in an urban area adjacent to major highways. The Project Site is situated within the Inner Coastal Plain, a part of the Coastal Plain province and in the east-central portion of the Mississippi Embayment, which is part of the Mississippi Alluvial Plain.

3.4.2 Topography

The Project Site rests on the top of a broad, north south trending ridge, as shown in Figure 4. Elevations range from 320 feet on the ridge to 280 feet on the southeast side of the ridge near a pond. Drainage off the ridge is predominantly to a pond and then to Hall Creek, Clear Creek and Cypress Creek Canals.

3.4.3 Soils

The following discussions and descriptions of Project Site soils are based on mapping and description from the Natural Resources Conservation Service's (NRCS) Web Soil Survey website (NRCS, 2018), the Shelby County, Tennessee Soil Survey (United States Department of Agriculture, 1970), and a Custom Soil Resource Report (NRCS, 2018). Figure 5 shows the soil types found on the Project Site. These soils are generally developed from the wind-blown silty loess and alluvium that blankets much of Shelby County. Only one of these soil units has a minor component that meets the hydric soil criteria.


- **Falaya silt loam (Fm)**, (2.1 percent of site). These somewhat poorly drained soils are found on the generally flat (0 to 1 percent) plains and flood plains. Depth to water table varies from 6 to 24 inches and soils may flood occasionally. Falaya soils may contain up to 9 percent inclusions of Waverly soils, a hydric soil. These soils are located in a small area of the southeast corner of the site. All areas are prime farmland.
- **Grenada silt loam (GaB2), 2 to 5 percent slopes, eroded** (0.6 percent of site). This soil is silt loam formed from fine-silty, noncalcareous loess. These moderately well drained soils are found along the summits of loess hills. The water table is typically from 12 to 28 inches below the ground surface. This soil is located in two small areas along the southeastern side of the site. All areas are prime farmland.



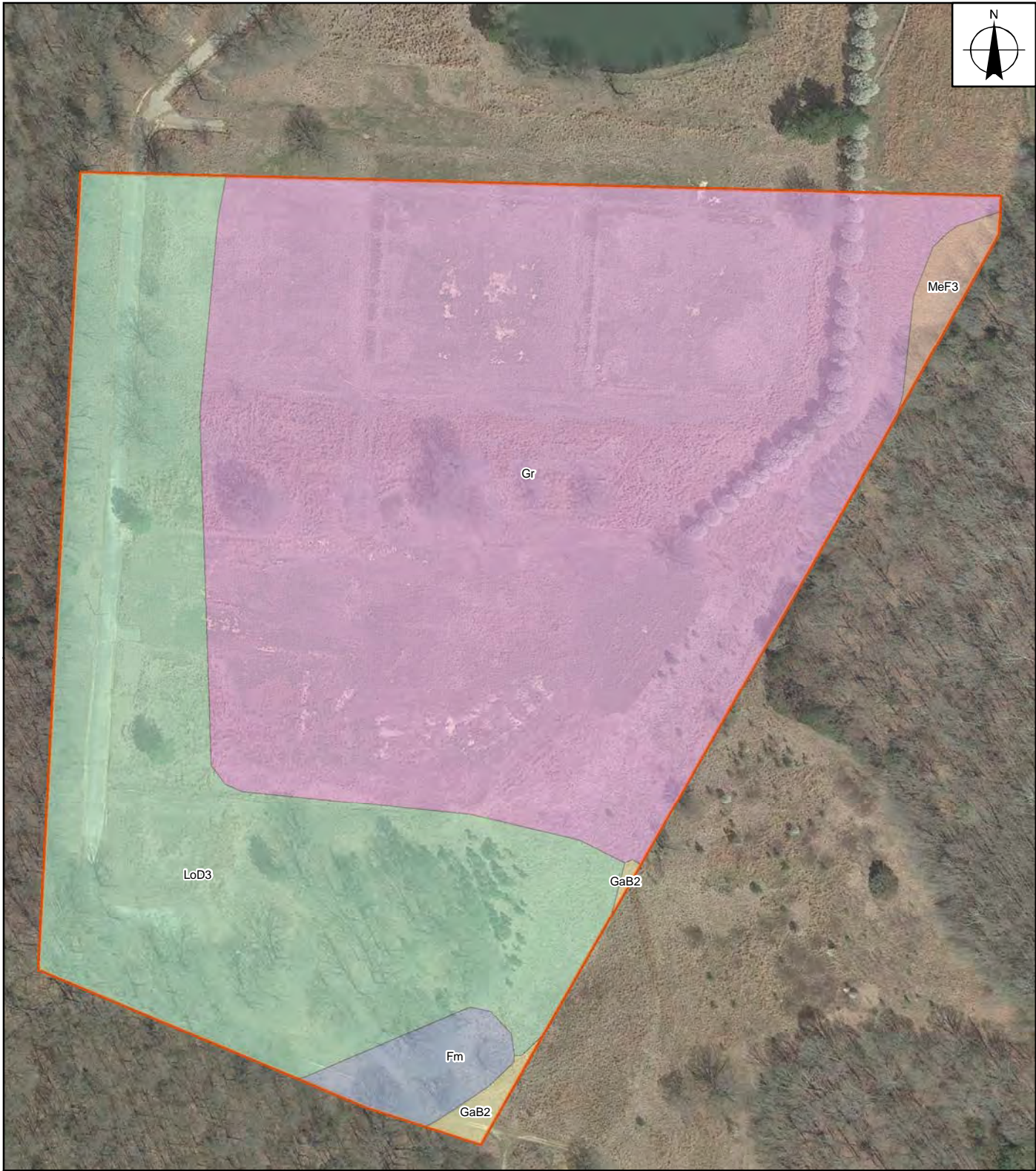
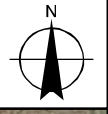
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FIGURE 4
TOPOGRAPHIC MAP
TENNESSEE VETERANS' HOME
ARLINGTON, TENNESSEE

LEGEND  SUBJECT PROPERTY BOUNDARY	NAD 1983 STATE PLANE TENNESSEE FEET  SCALE IN FEET
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Source: U.S. Geological Survey, Eads, Arlington Quadrangles, Tennessee [Map]. Photorevised 2016. 1:24,000. 7.5 Minute Series.

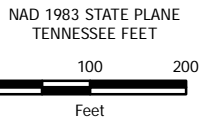


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LEGEND

- FM - FALAYA SILT LOAM
- GAB2 - GRENADA SILT LOAM, 2 TO 5 PERCENT SLOPES, ERODED
- GR - GRADED LAND, SILTY MATERIALS (UDORTHENT, SILTY)
- LOD3 - LORING SILT LOAM, 5 TO 12 PERCENT SLOPES, SEVERELY ERODED
- MEF3 - MEMPHIS SILT LOAM, 12 TO 30 PERCENT SLOPES, SEVERELY ERODED
- SUBJECT PROPERTY BOUNDARY

**FIGURE 5
AREA SOILS
TENNESSEE VETERANS' HOME
ARLINGTON, TENNESSEE**



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- **Graded Land (Gr), silty materials (Udorthent, silty)** (62.5 percent of site). These soils are composed of silty soil material that has been greatly altered by human activities. At the proposed veterans' home these soils are in areas where soils were graded to construct the previous residence cottages, gymnasium, education building, and associated outbuildings and infrastructure (roads and parking areas). These areas were more recently disturbed again when these structures were demolished and removed from the site. Soil properties are highly variable due to past disturbance. Graded land comprises most of the central and eastern parts of the Project Site. Graded Land is not prime farmland.
- **Loring silt loam (LoD3), 5 to 12 percent slopes, severely eroded** (33.7 percent of site). This soil is silt loam formed from fine-silty, noncalcareous loess. These moderately well drained soils are found along the summits of loess hills. The water table is typically from 21 to 27 inches below the ground surface. Loring soils have a restrictive horizon (fragipan) 30 to 48 inches below the ground surface that hinders percolation and root growth. This soil is located along the eastern and southern parts of the site, and all areas are not prime farmland.
- **Memphis silt loam (MeF3), 12 to 30 percent slopes, severely eroded** (1.1 percent of site). This soil is silt loam formed from fine-silty, noncalcareous loess (wind-blown silt). These well drained soils are found along the summits of loess hills. The depth to water table is more than 60 inches. This soil is located in a small area of the northeast corner of the site and is not considered prime farmland.

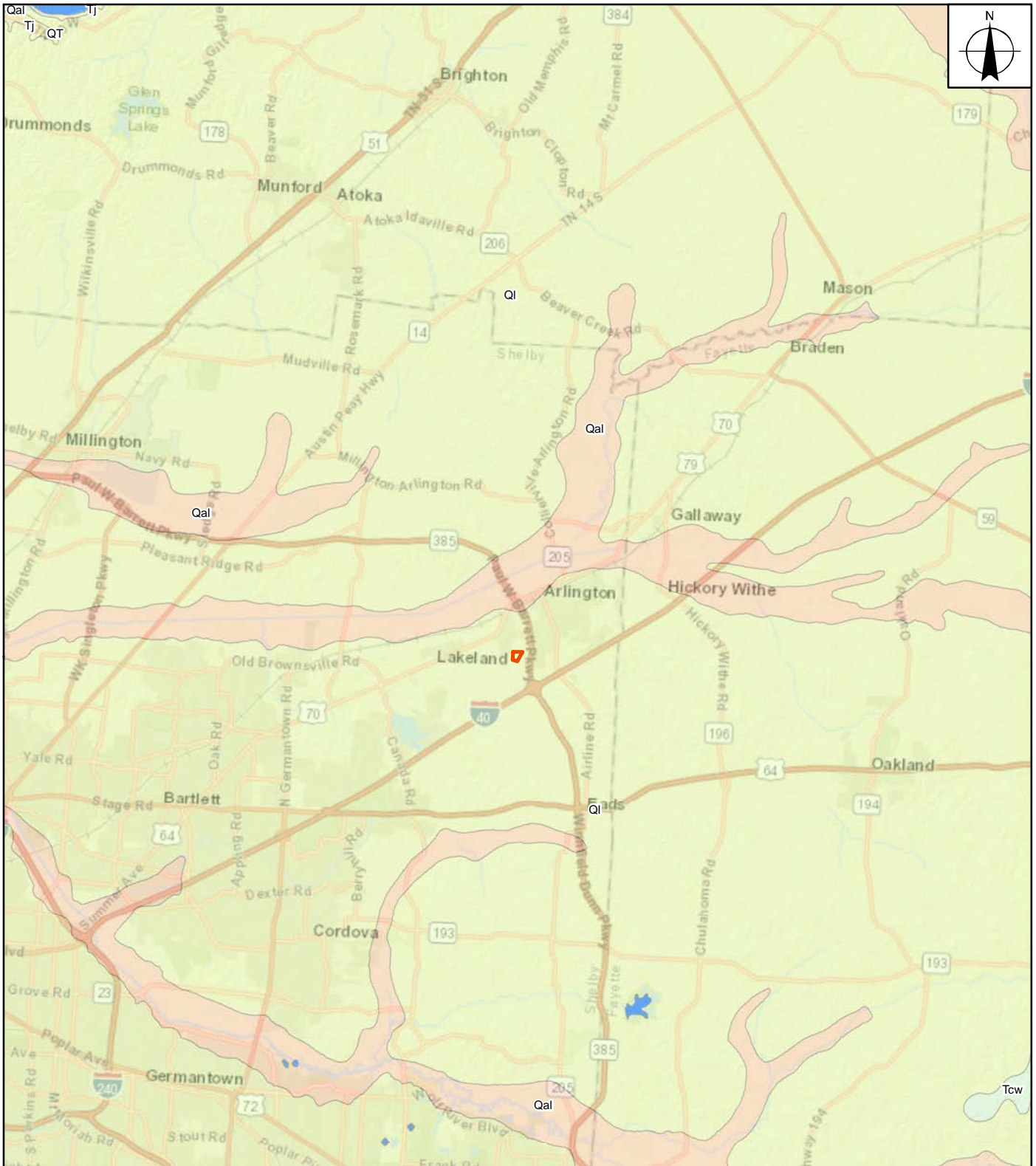
3.4.4 Geology

The Project Site lies along the Mississippi Alluvial Plain which is characterized by fluvial deposits of clays, silts, sands, and gravels from the Mississippi River. The river deposits are part of the north-central portion of the Mississippi Embayment, a broad structural trough or syncline that plunges southward along an axis that approximates the Mississippi River. The syncline is filled by thousands of feet of unconsolidated to semi-consolidated sediments of Tertiary age formations that underlie the alluvial plain (Cox and Van Arsdale, 2002). These formations dip gently westward into the embayment and southward down the synclinal axis (Parks et al., 1990) and overlie deeper Cretaceous and Cenozoic sediments and rocks.

Information from the United States Geological Survey (USGS) Map of Tennessee — West sheet, (USGS, 2018) indicates that the Project Site and surface soils (Figure 6) are underlain by unconsolidated Quaternary and Tertiary deposits consisting of Holocene and Quaternary fluvial alluvium, windblown loess, and deeper Tertiary Eocene marine formations deposited in the Mississippi embayment by the encroaching ancestral Gulf of Mexico. The following Quaternary and Tertiary deposits and formations underlie Memphis and the Project Site. They are listed in descending order as follows:

- **Alluvium** — sands, silts, and clays deposited by the Mississippi River and its tributaries during the Holocene and Pleistocene.
- **Loess** — upland aeolian (wind-blown) silt deposited along and east of the Mississippi River during the Pleistocene.
- **Upland Complex** — fluvial sands, gravel and terrace deposits east of the Mississippi River and deposited during the Quaternary/Tertiary.
- **Jackson Formation** — sand, silt, clay, and lignite; deposited in the Tertiary Eocene. The Project Site is near the eastern limit of this formation and it is frequently absent.
- **Cook Mountain and Cockfield Formation** — fluvial silt, sand and lacustrine clay; regional Tertiary Eocene aquitard in the Memphis area. The Project Site is near the eastern limits of these formations.
- **Memphis Sand** — thick Tertiary Eocene fluvial sand (“500-foot sand”); the primary regional aquifer in Memphis and much of southwestern Tennessee.
- **Flour Island Formation** — fluvial silt, clay, and sand; a lower Tertiary Eocene confining unit.
- **Fort Pillow Sand** — sand and minor clay and a Tertiary Paleocene (“1,400-foot sand”) aquifer.

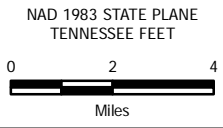
The Quaternary and Tertiary deposits, and deeper Cretaceous rocks, unconformably overlie deep Paleozoic rocks which cover a failed Precambrian seismic rift characterized by faulting. However, the Project Site is located outside of the New Madrid seismic zone associated with the rift.



LEGEND

- QT - HIGH LEVEL ALLUVIAL DEPOSITS
- QAL - ALLUVIAL DEPOSITS
- QL - LOESS
- TCW - CLAIBORNE AND WILCOX FORMATION
- TJ - JACKSON (?) FORMATION
- WATER
- SUBJECT PROPERTY BOUNDARY

FIGURE 6
AREA GEOLOGY
TENNESSEE VETERANS' HOME
ARLINGTON, TENNESSEE



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Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, © OpenStreetMap contributors, and the GIS User Community; Geology Info - <https://mrdata.usgs.gov/geology/state/state.php?state=TN>

3.4.5 Seismic Activity

Western Tennessee lies at the southern edge of the New Madrid Seismic Zone to the north, as shown in Figure 7. Formed more than 600 million years ago, the New Madrid Seismic Zone is currently the most active seismic zone in the North American mid-plate. Older faults have been buried by younger sediments but have been reactivated in a compressive stress regime created by intercontinental pressures to the west and east (Metzger and Johnston, 1998), with younger faults extending to the near surface (Cox et al., 2000).

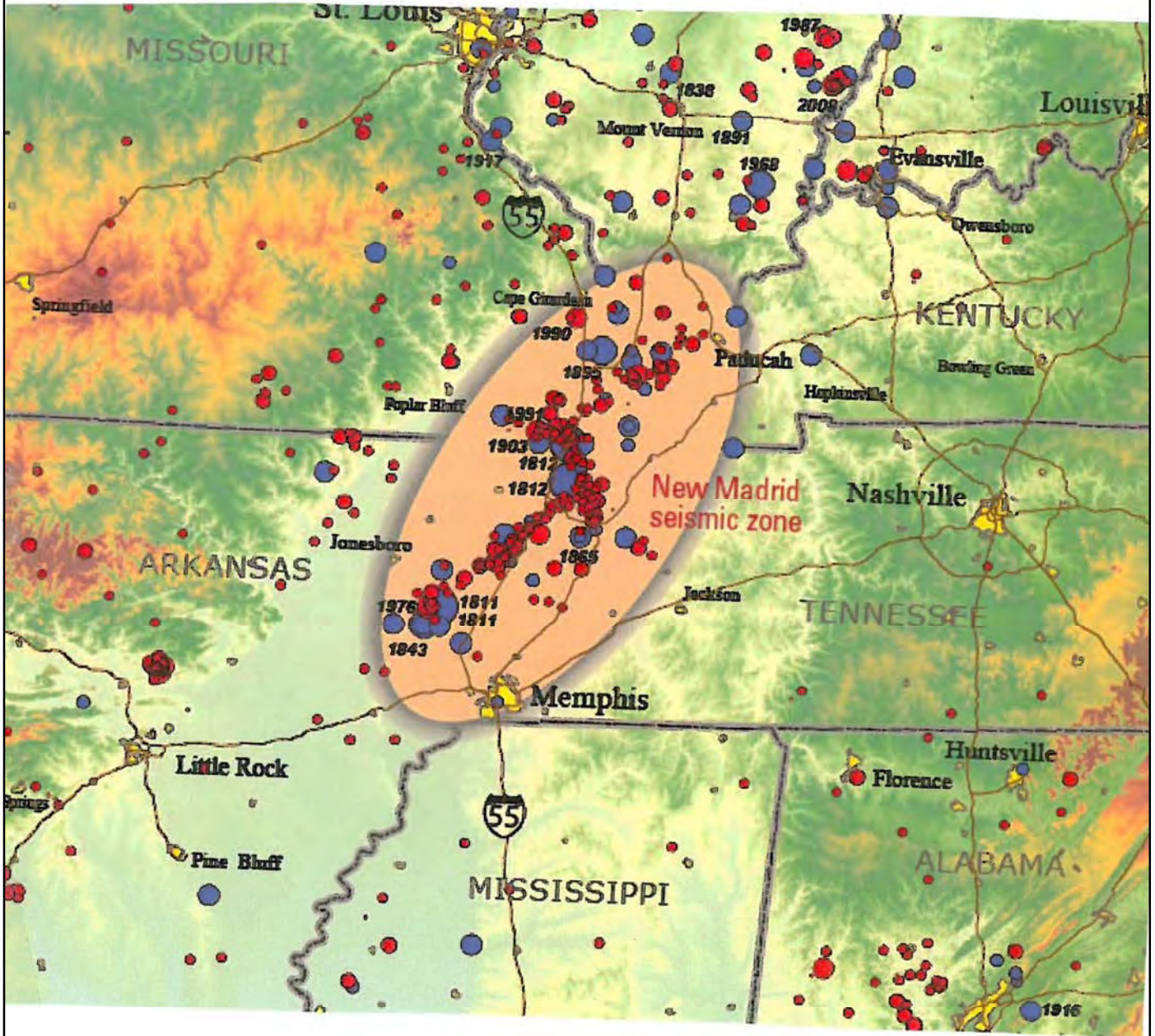
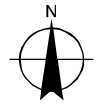
Faults are mapped in Shelby County based on well log interpretation and seismic mapping (USGS, 1990), and one mapped splinter fault is reported southwest within 5 miles of the Project Site. The splinter faults are oriented from northwest to the southeast from the Mississippi River axis. Given its location with respect to the New Madrid, damaging earthquakes and ground liquefaction are moderately probable in Memphis, with a high potential for structural damage in areas close to the Mississippi River or along tributary waterways. Liquefaction mapping in Memphis and Shelby County has been prepared (Rix and Romero-Hudock, 2006) and shows that deposits along rivers and streams have the greatest potential for liquefaction.

3.4.6 Geologic Hazards

While there is potential for damage to Project Site buildings during a major earthquake, ground motion and liquefaction cannot be predicted. Buildings should be constructed according to the recommended seismic provisions in the most recent building codes for new buildings (Federal Emergency Management Agency, 2014). There are no other significant geologic hazards associated with the Project Site (Cramer et al., 2014; USGS, 2004). Based on surface topography, shallow sloughing and landslides are not anticipated, and the Project Site is not in karst terrain.

3.4.7 Environmental Consequences of the Proposed Action

The Initial Development of the Proposed Action would occur on approximately 28.65 acres of the Project Site. Disturbed soils generated during the construction of the Proposed Action would be reused in areas requiring fill material or would be transported offsite. Site topography would not be significantly altered. Drainage changes resulting from the construction of the Proposed Action are expected to be minor and would be monitored for erosion potential through routine site storm water management practices.



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NOTES:

- NOT TO SCALE
- MAP TAKEN FROM EARTHQUAKE HAZARD IN THE NEW MADRID SEISMIC ZONE. INTERNET: [HTTP://GEOLOGY.COM/USGS/NEW-MADRID-SEISMIC-ZONE/NEW-MADRID-SEISMIC-ZONE-MAP-LG.JPG](http://geology.com/usgs/new-madrid-seismic-zone/new-madrid-seismic-zone-map-lg.jpg) REPUBLISHED FROM UNITED STATES GEOLOGICAL SURVEY FACT SHEET 2009-3071 OF AUGUST, 2009.

FIGURE 7
NEW MADRID SEISMIC ZONE
TENNESSEE VETERANS' HOME
ARLINGTON, TENNESSEE

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Possible adverse impacts to soils through erosion and sedimentation are possible during construction activities associated with the Proposed Action. Construction activities that have the potential to disturb and expose subsurface soils and increase susceptibility to wind and surface runoff erosion include the following:

- Vegetative clearing.
- Adjustments to site grading.
- New roadway construction.
- Construction of the buildings.

Construction at the site will require a National Pollutant Discharge Elimination System (NPDES) construction permit and development of a Stormwater Pollution Prevention Plan (SWPPP). The Town of Arlington has a Phase II Municipal Separate Storm Sewer System (MS4) permit, which allows Arlington to discharge storm water from its drainage system into nearby rivers and streams. The Town will evaluate storm water management plans for consistency with the adopted watershed master plan for the major watershed or watersheds within the project site. The project evaluation will determine if proposed storm water management practices can adequately serve the property and limit impacts to downstream public and private properties. The presence of a regional facility will be considered in determining the extent to which peak discharge and/or quality controls will be necessary.

An erosion control phasing plan describing the vegetative stabilization and management techniques to be used at the site during and after construction is completed will be required as part of Arlington's plan review and approval process. This plan provide details about how the site will be stabilized after construction, but also who will be responsible for the maintenance of vegetation at the site and what practices will be employed to ensure that adequate vegetative cover is preserved. Changes to the erosion control phasing plan after plan review and approval will require Arlington's approval.

Wind erosion could temporarily increase airborne particulate matter in the area, resulting in short-term health, visibility, and aesthetics impacts, as previously discussed in Sections 3.1 and 3.2. Exposure and redistribution of soils could result in minor, short-term increases in sediment loads from erosion and runoff to storm water; with subsequent sedimentation in storm water drains and waterways.

The Proposed Action is expected to have minor short-term impacts on geology and soils due to the potential for soil erosion and sedimentation during construction. The short-term minor impacts would be managed by the retained Construction contractor in accordance with applicable specifications, erosion and air quality control measures utilized by onsite personnel. The adverse minor impacts to geology and soils are not considered significant. Soil erosion BMPs will be implemented to control storm water runoff and reduce soil erosion from the site in accordance with appropriate laws and regulations. Specific measures to mitigate for the minor impacts to geology and soils due to construction are described in Section 4.2.

In coordination with the NRCS, the site was evaluated with regards to the Farmland Protection Policy Act (FPPA) procedures. The Proposed Action would have little adverse effects on any prime or unique farmlands, as <3 percent of the soils are considered to qualify as prime farmland. Additionally, the Project Site is in Arlington, Tennessee, an urbanized area with land that has been committed to urban development through land use and zoning designations. Such designations are classified as urbanized areas and are exempt from the FPPA.

3.4.8 Environmental Consequences of the No Action Alternative

Under the No Action Alternative, construction of the proposed veterans' home facilities would not occur and no impacts to geology, soils, or prime farmlands would result, beyond any minor erosion during major storm events. Erosion would decrease as vegetation and groundcover increase on the undeveloped property.

3.5 Hydrology and Water Quality

This section discusses the surface water and groundwater water hydrology and water quality at the Project Site and examines the impacts of the Proposed Action on hydrology and water quality. Under the Clean Water Act (CWA), impacts to "Waters of the U.S." are jointly regulated by the US EPA and the US Army Corp of Engineers (USACE). USACE has legal authority to implement and enforce the provisions of the CWA (and Section 10 of the Rivers and Harbors Act), while EPA retains oversight responsibilities.

3.5.1 Affected Environment

Surface water from the Project Site is within the Loosahatchie River Basin (Hydrologic Unit Code 08010209). There are no streams on the proposed Project Site. Drainage from the northern end of the 28.65-acre site flows northward into a constructed, 2.3-acre pond which ultimately discharges into an unnamed tributary to Clear Creek. Drainage from the eastern and southern sides of the site

flows along existing ephemeral drains and culverts into an unnamed tributary to Hall Creek, a tributary to Clear Creek. Drainage from the west side of the site eventually discharges into an unnamed tributary to Clear Creek.

The TDEC Division of Water Resources and U.S. EPA consider Clear Creek and Hall Creek as impaired waters (TDEC 2018; U.S. EPA 2018). Clear Creek is considered impaired due to total phosphorus and *Escherichia coli* (*E. coli*), grazing in riparian or shoreline zones, and sedimentation/siltation and physical substrate habitat alterations from channelization. Hall Creek is impaired due to physical substrate habitat alterations from channelization and *E. coli* from municipal sources (urbanized, high density area). TDEC has a monitoring site on Hall Creek approximately 0.66 mile southeast of the Project Site and two monitoring sites on Clear Creek (0.85 mile west-southwest and 1.11 miles west-northwest of the Project Site).

3.5.2 Hydrogeology and Aquifers

The alluvial deposits beneath the Mississippi Alluvial Plain are commonly between 100 and 150 feet thick, with gradual thinning to the east side of Shelby County. They make up the regional Mississippi River Valley alluvial aquifer and a shallow fluvial alluvial aquifer farther to the east. Deeper groundwater is found in the Tertiary-aged Memphis Sand aquifer (500 feet below ground surface) and the Fort Pillow Sand aquifer (1,400 feet below ground surface). Shallow groundwater from the alluvial aquifer is not considered an important industrial or viable drinking water source; however, the deeper Memphis Sand aquifer serves as the primary municipal and industrial water sources for the City of Memphis and surrounding communities, while the Fort Pillow Sand is an important secondary source (Hosman and Weiss, 1991; Kingsbury and Parks, 1993).

Groundwater in the Memphis Sand flows east to west; recharge is from outcrops east of Memphis and Shelby County. A series of well fields owned and operated by Memphis Light, Gas and Water produce public water supplies from wells ranging from 80 to 922 feet deep. Well yields range from 10 to 2,300 gallons per minute (Parks et al., 1990). The Shaw and McCord municipal well fields are closest to the Project Site.

3.5.3 Environmental Consequences of the Proposed Action

Runoff from the site during construction will consist of sheet flow into ditches and drains that were constructed on the 28.65-acre tract. Construction at the site will require a National Pollutant Discharge Elimination System (NPDES) construction permit and development of a Stormwater Pollution Prevention Plan (SWPPP). The Town of Arlington also has a Phase II MS4 permit, which allows Arlington to discharge storm water from its drainage system into nearby rivers and streams.

The NPDES and MS4 permits and the SWPPP will include details for the installation and maintenance of storm water infrastructure and additional BMPs to control storm water runoff and reduce soil erosion. These measures will reduce any adverse impacts to surface hydrology, water quality downstream, and possible recharge to the underlying shallow aquifer from the proposed Project Site. Following construction and stabilization of the site, the effects on hydrology and water quality will become even more diminished, as more vegetation becomes more established. Prior to initiation of any construction, local land disturbance and state construction storm water permit(s) will be acquired.

3.5.4 Environmental Consequences of the No Action Alternative

Under the No Action Alternative, the Proposed Action would not occur and no impacts to hydrology or water quality would result at the site and in receiving waters downstream. Site hydrology and water quality would remain unchanged from the current pre-project conditions. Assuming no further site disturbance, the hydrology and water quality would improve as more groundcover and tree cover becomes established.

3.6 Wildlife and Habitat

Wildlife primarily relates to the native fauna, and sometimes flora, of a region. Habitat primarily relates to the environment in which the wildlife normally lives and meets its basic need for nutrition, water, cover, breeding space, and/or group territory. This section lists the areas threatened and endangered species, provides a list of invasive plants found on the Site, and examines the impacts of the Proposed Action on wildlife and habitat.

3.6.1 Existing Environment

The Project Site is in the Loess Plains ecoregion. The elevation of the Project Site ranges from approximately 290 amsl to 320 feet amsl. The Project Site is bordered by forested land on the south and east boundaries. The current Youth Villages' Dogwood Campus and the TDIDD West Tennessee Regional Office are located to the north, and a residential subdivision with a forested buffer is located to the west.

During a site visit on October 10, 2018 biologists identified herbaceous, forest, and shrubland habitats at the Project Site. The herbaceous habitat covers about 23 acres within the central and northern portion of the Project Site where the former Arlington Developmental Center buildings stood. Dominant plants include a mix of lawn grasses and other herbaceous plants with scattered cultivated and volunteer Bradford pear trees that were planted or colonized the site after demolition of the buildings in 2014. The herbaceous area is maintained by periodic mowing. A mix of forest and shrubland habitat covers approximately 5.6 acres across the southern and eastern boundaries of the

Project Site. The forest habitat consists of a mixed hardwood forest that includes oaks, hickories, sweetgum, and sycamore. Shrubland surrounds the forested areas on the southern and eastern side of the Project Site and consists of Chinese privet, loblolly pine, Bradford pear, and a mixture of young deciduous trees.

The diverse habitats at the Project Site would support a variety of wildlife species. Mammals likely to use the Project Site include white-tail deer, groundhog, striped skunk, gray squirrel, raccoon, opossum, armadillo, shrews, mice, and voles. Other potential inhabitants include various birds, reptiles, and amphibians. Records compiled and maintained by the Cornell Lab of Ornithology and National Audubon Society joint website ([eBird 2017](#)) include at least 346 bird species observed throughout Shelby County.

3.6.2 Threatened and Endangered Species

According to the U.S. Fish and Wildlife Service (USFWS) and Tennessee Division of Natural Areas there are 27 rare, threatened, or endangered species whose occurrences have been documented in Shelby County. These species are listed below in Table 1. None of these species have been identified at the proposed project location. Correspondence with USFWS and TDEC Division of Natural Areas specific to this project did not identify any listed species that would be affected by the proposed action. A site survey conducted by EnSafe biologists in November 2018 confirmed that it was unlikely that habitat at the Project site would support any of the species listed in Table 1.

Table 1 Federal and State Threatened and Endangered Species for Shelby County			
Scientific Name	Common Name	Federal Status	State Status
Amphibians			
<i>Hyla gratiosa</i>	Barking Treefrog	NS	D
Birds			
<i>Chondestes grammacus</i>	Lark Sparrow	NS	T
<i>Dendroica cerulea</i>	Cerulean Warbler	NS	D
<i>Haliaeetus leucocephalus</i>	Bald Eagle	NS	D
<i>Ictinia mississippiensis</i>	Mississippi Kite	NS	E
<i>Limnothlypis swainsonii</i>	Swainson's Warbler	NS	D
<i>Sternula antillarum athalassos</i>	Interior Least Tern	E	E
<i>Thryomanes bewickii</i>	Bewick's Wren	NS	E
<i>Tyto alba</i>	Barn Owl	NS	D
Fish			
<i>Ammocrypta beani</i>	Naked Sand Darter	NS	D
<i>Cycleptus elongatus</i>	Blue Sucker	NS	T
<i>Noturus gladiator</i>	Piebald Madtom	NS	D
Mammals			
<i>Myotis septentrionalis</i>	Northern Long-eared Bat	T	NS
<i>Myotis sodalis</i>	Indiana Bat	E	NS
<i>Neotoma floridana illinoensis</i>	Eastern Woodrat	NS	D
<i>Sorex longirostris</i>	Southeastern Shrew	NS	D
Reptiles			
<i>Pituophis melanoleucus</i>	Northern Pinesnake	NS	T
Plants			
<i>Heteranthera multiflora</i>	Multiflowered Mud-plantain	NS	S
<i>Hottonia inflata</i>	American Featherfoil	NS	S
<i>Iris fulva</i>	Copper Iris	NS	T
<i>Magnolia virginiana</i>	Sweetbay Magnolia	NS	T
<i>Panax quinquefolius</i>	American Ginseng	NS	S-CE
<i>Rhynchospora harveyi</i>	Harvey's Beakrush	NS	T
<i>Schisandra glabra</i>	Red Starvine	NS	T
<i>Silene ovata</i>	Ovate Catchfly	NS	E
<i>Symphyotrichum praealtum</i>	Willow Aster	NS	E
<i>Ulmus crassifolia</i>	Cedar Elm	NS	S

Source: U.S. Fish and Wildlife Service 2018a; Tennessee Division of Natural Areas 2018)

Notes:

- E = Endangered
- T = Threatened
- D = Deemed in Need of Management
- S = Special Concern
- CE = Commercial Exploitation
- NS = No Status

An informal bat habitat assessment for the northern long-eared bat was conducted according to procedures outlined in the *Range-Wide Indiana Bat Summer Survey Guidelines* (USFWS 2018b). No snags and no trees with exfoliating bark, cracks, and/or crevices were observed on the Project Site. Additionally, no signs of bat roosting (e.g., guano or urine staining) were observed within the subject property. Although appropriate foraging habitat with open flight corridors is provided by adjacent ponds to the south and north of the property boundary, suitable habitat requires potential roost trees. For this reason, the site does not contain suitable habitat for the two species. Furthermore, the closest documented Indiana bat site in west Tennessee is in McNairy County and the closest northern long-eared bat site is in Wayne County according to the *Conservation Strategy for Forest-dwelling Bats in Tennessee* (USFWS 2017).

3.6.3 Invasive Plants

In 2018 the Tennessee Invasive Plant Council (TN-IPC) revised its Invasive Plants of Tennessee list to highlight new plant species that have emerged as potential threats to native plant communities in Tennessee and focusing on species most likely to significantly affect intact native plant communities or hinder their restoration. The list does not (re)enumerate all non-native invasive plant species in Tennessee but instead emphasizes species that matter most to those seeking to manage natural areas or restore native plant and animal habitats. TN-IPC strives to place a sharp focus on those species that pose the greatest threats to the integrity and function of native plant communities. For these reasons, the list is organized into two categories, Established Threat and Emerging Threat.

Established Threat — Species in this category are archetypal invasive weeds known by every land manager, but all are widely established across Tennessee. These taxa cannot be eradicated on a landscape scale using methods currently available.

Emerging Threat — Species in this category are known to invade and disrupt natural plant communities in adjacent states. Theoretically, the early detection/rapid response model could be used to eliminate infestations or reduce the spread of these species in Tennessee.

Furthermore, three plant species are listed as noxious weeds by the United States Department of Agriculture (USDA). These include purple loosestrife (*Lythrum salicaria* and *Lythrum virgatum*) and tropical soda apple (*Solanum viarum*) (USDA, 2014). The Tennessee Department of Agriculture (TDA) currently regulates 13 species of pest plants (TDA 2018), including tropical spiderwort (*Commelina benghalensis*), autumn olive (*Elaeagnus umbellata*), thorny olive (*Elaeagnus pungens*), cogongrass (*Imperata cylindrica*), Chinese privet (*Ligustrum sinense*), common privet (*Ligustrum vulgare*),

shrub honeysuckle (*Lonicera maackii*), Morrows shrub honeysuckle (*Lonicera morrowii*), Bell's honeysuckle (*Lonicera x bella*), purple loosestrife (*Lythrum salicaria*, *Lythrum virgatum*, and related cultivars), multiflora rose (*Rosa multiflora*), giant salvinia (*Salvinia molesta*), and tropical soda apple (*Solanum viarum*). As regulated pest plants these species cannot be propagated, sold, offered for sale, or released within the state.

Executive Order 13112 requires the prevention and control of invasive species. It directs Federal agencies to not authorize, fund, or carry out actions that they believe are likely to cause or promote the introduction or spread of invasive species in the U.S. unless the agency has determined and made public its determination that the benefits of such actions clearly outweigh the potential harm caused by invasive species; and that all feasible and prudent measures to minimize risk of harm will be taken in conjunction with the actions.

The guidelines of EO 13112 will be adhered to while constructing and maintaining the project to control and prevent the spread of any invasive exotic species to the project site. To the extent possible TSVH will use invasive-free seed mixtures and re-vegetate with native or noninvasive plant species. Table 2 shows the observed exotic plant species in the Project Site during the fall of 2018.

Scientific Name	Common Name	Tennessee Status
<i>Cirsium arvense</i>	Canada Thistle	No Status
<i>Lespedeza cuneata</i>	Chinese Lespedeza	Established Threat
<i>Ligustrum sinense</i>	Chinese Privet	Established Threat
<i>Microstegium vimineum</i>	Nepalese Browntop	Established Threat
<i>Pyrus calleryana</i>	Callery Pear	Established Threat
<i>Setaria pumila</i>	Yellow Foxtail	No Status
<i>Sorghum halapense</i>	Johnson Grass	Established Threat

Source: Tennessee Invasive Plant Council (2018)

3.6.4 Environmental Consequences

3.6.4.1 Proposed Action

The implementation of the Proposed Action would replace the majority of the 23 acres of herbaceous habitat with the new facility and associated infrastructure. The current conceptual design appears to avoid the forested and peripheral shrubland habitat. Construction of the Proposed Action would cause some minor disturbance to any species using these habitats; however, impacts to wildlife species would be short-term. The proposed construction of new roads, buildings, and other infrastructure would permanently modify the existing natural habitat. Overall, this loss of habitat would be minor and not result in significant impacts to wildlife or habitat.

No potential roost trees for Indiana and Northern Long-Eared Bats are located within in the Project Site. Initial coordination with the USFWS for this and similar sites suggests that the agency will likely not anticipate adverse impacts to rare, threatened, and endangered animal or plant species or critical habitat provided that BMPs to control storm water runoff and reduce soil erosion are used during construction. BMPs and other measures to mitigate for the minor impacts to ecological resources are described in Section 4.2.

3.6.4.2 No Action Alternative

Under the No Action Alternative, the Proposed Action would not occur and no impacts to vegetation, wildlife, or threatened and endangered species would result.

3.7 Noise

Noise can be defined as unwanted sound. Sound becomes unwanted when it either interferes with normal activities such as sleeping, conversation or recreation, or when it causes physical harm such as hearing loss or has adverse effects on mental health. In general, sources of noise impacts are related to either occupational noise, created by loud machinery, or community noise, where the combined effect of many individual noise sources creates an overall noise level that is unacceptable to certain receptors. The human response to noise varies depending on the type and characteristics of the noise, the pitch, the distance between the noise source and the receptor, receptor sensitivity, and time of day. This section examines the noise impacts that would occur as a result of the Proposed Action.

Although human response to noise varies, measurements can be calculated with instruments that record instantaneous sound levels in decibels. A-weighted decibel (dBA) is used to characterize sound levels that can be sensed by the human ear. The threshold of audibility is generally within the range of 10 to 25 dBA for normal hearing. The threshold of pain occurs at the upper boundary of audibility, which is normally in the region of 135 dBA (EPA 1981). Noise levels can become annoying at 80 dBA and very annoying at 90 dBA. To the human ear, a change in noise levels of 5 dBA is generally discernible while a change of 10 dBA is perceived by the human ear as either a doubling or halving of noise levels (EPA 1981). Very few noises are constant, so a noise metric, the day-night sound level (DNL), has been developed to average ongoing yet intermittent noise and measures total sound energy over a 24-hour period. DNL is defined as the average sound energy in a 24-hour period with a 10-dBA penalty added to nighttime levels (i.e., 10 p.m. to 7 a.m.). The nighttime penalty is based upon the assumption that people react to nighttime noise exposures as though they were twice as loud as daytime exposures.

The Noise Control Act of 1972 included requirements for EPA to set a criterion for noise levels adequate to protect health and welfare. In 1974, the EPA provided information suggesting that continuous and long-term noise levels more than 65 dBA DNL are normally unacceptable for noise-sensitive land uses such as residences, schools, churches, and hospitals (EPA 1974). However, in the early 1980s responsibilities for regulating noise control policies were transferred to state and local governments (EPA 1981). Subsequently, the overall approach to addressing noise impacts has been to developed regulations which are related to the overall community noise level, but that apply to agency-specific programs or projects and are not binding on local communities. Widely accepted noise standards are those of the Department of Housing and Urban Development (HUD). HUD regulations set forth exterior noise standards for new housing construction. Noise levels exceeding 75 dBA DNL are considered unacceptable, while 65 dBA DNL or less are considered acceptable (HUD 2009).

3.7.1 Existing Environment

Some land uses are considered more sensitive to intrusive noise than others due to the amount of noise exposure and the type of activities typically involved at the receptor location. Land uses that are sensitive to noise are those uses where exposure would result in adverse effects (i.e., injury or annoyance) and uses where lack of noise is an essential element of their intended purpose. Residences, schools, motels and hotels, libraries, religious institutions, hospitals, nursing homes, and parks are generally more sensitive to noise than commercial and industrial land uses.

Nearby noise sources include local road traffic along State Road 385 and Interstate 40 or noise from the Arlington Sports Complex. The Proposed Action represents a land use that would be considered more sensitive to intrusive noise.

3.7.2 Environmental Consequences

3.7.2.1 Proposed Action

The Proposed Action would result in minor, intermittent, short-term adverse noise impacts due to construction-related noise. The construction-related noise sources would be commensurate with any construction site with typical earth-moving equipment, temporary, and limited to daytime hours. Sources of construction-related noise during the Proposed Action would include construction equipment (including grading equipment, large trucks, and road construction and paving equipment) and other contractor vehicles commuting to and from the Project Site.

The operational-related noise sources include grounds maintenance equipment (including mowers, leaf blowers, and small vehicles). When considering the day-night sound level metric, as a measure of total sound energy over a 24-hour period, the long-term noise impacts due to operational-related noise are not expected to exceed a 65-dBA DNL exterior noise level. The long-term operational-related noise levels would be intermittent and a minor contributor to overall sound levels when compared with existing conditions. As such, mitigation measures are not currently proposed to address long-term intermittent noise related to operation of the Proposed Action.

The Proposed Action would result in minor, short-term and long-term noise impacts due to sources of construction-related noise and intermittent operational-related noise, including grounds maintenance equipment and occasional use of emergency generators. The short-term minor impacts would be managed by the retained contractor and facility staff. The long-term minor noise impacts would be intermittent; therefore, no mitigation measures are currently proposed. Overall, the adverse minor noise impacts are not considered significant.

3.7.2.2 No Action Alternative

Under the No Action Alternative, no changes in the ambient noise environment would occur. No construction or change in operations would be expected. Ambient noise conditions would remain unchanged when compared to existing conditions.

3.8 Land Use

The term “land use” refers to real property classifications that indicate either natural conditions or the types of human activity occurring on a parcel, or within the structures that occupy the parcel. Types of land uses may include residential, agricultural, commercial, industrial, vacant land, and parks. In many cases, land use descriptions are codified in local zoning laws. Zoning focuses on how land is currently being used and how it will be used in the future. The goal is to provide for public safety and protect the character of neighborhoods and special districts. An important factor affecting a Proposed Action in terms of land use is its compliance with applicable land use or zoning regulations. Other relevant factors include existing land use at the Project Site, the types of land uses on adjacent properties, their proximity to the Proposed Action, and the duration of a proposed activity and its permanence. The significance of potential land use effects is based on the level of land use sensitivity in areas affected by the Proposed Action and the compatibility of a proposed project with existing conditions.

3.8.1 Existing Environment

The Proposed Action is located within the Town of Arlington, in Shelby County, Tennessee. According to the Town of Arlington website, (<http://www.townofarlington.org>) land use and zoning requirements for the Proposed Action are established by the Municipal Planning Commission. According to the Town of Arlington Official Zoning Map the land associated with the Proposed Action is currently zoned as “estate residential”. The areas to the north and south are also classified as residential estate and the areas to the east and west are classified as single family residential. The Town of Arlington future land use map indicates the land associated with the Proposed Action is designated as mixed use. The areas east and west of the Project Site area are designated as suburban residential. The area south of the Project Site is designated as mixed use and the area north of the Project Site, Youth Villages’ Dogwood Campus and the TDIDD West Tennessee Regional Office, are designated as institutional.

3.8.2 Environmental Consequences

3.8.2.1 Proposed Action

The Proposed Action includes an estimated 125,054-SF, 126-bed skilled nursing facility on a 28.65-acre portion of a 416.72-acre property formerly developed as the Arlington Developmental Center, a state-owned property located in Arlington, Shelby County, Tennessee. The Proposed Action would not physically divide an established community or conflict with any applicable habitat conservation plan. The Proposed Action will not conflict with any applicable land use plan, policy, or zoning ordinance of the Town of Arlington.

Impacts to prime or unique farmland were considered under the FPPA. The FPPA is intended to minimize the impact federal programs have on the unnecessary and irreversible conversion of farmland to nonagricultural uses. The Project Site is located within the Census Designated Places of Arlington, Tennessee. Such designations are classified as an “urbanized areas” and are exempt from this Act.

The Proposed Action would be consistent with existing land uses and does not directly displace current land use. Changes in land use or zoning would not occur as a result of the Proposed Action. Land use would remain unchanged when compared to existing conditions.

3.8.2.2 No Action Alternative

Under the No Action Alternative, no changes in land use or zoning would occur. Land use would remain unchanged when compared to existing conditions.

3.9 Floodplains and Wetlands

Effective floodplain management is essential for promoting public safety and minimizing the potential economic impact of natural disasters. Wetlands provide important ecosystem services and habitat for many species of wildlife. This section discusses the floodplains and wetlands at the Project Site and the potential impacts to these resources that could occur because of the Proposed Action.

3.9.1 Existing Environment

EO 11988, *Floodplain Management*, defines floodplains as “the lowland and relatively flat areas adjoining inland and coastal waters, including flood-prone areas of offshore islands, including at a minimum, the area subject to a one percent or greater chance of flooding in any given year” (i.e., that area inundated by a 100-year flood). EO 11988 requires federal agencies avoid, to the extent possible the long- and short-term adverse impacts associated with the occupancy and modification of floodplains and to avoid direct or indirect support of floodplain development wherever there is a practicable alternative.

The Federal Emergency Management Agency (FEMA) has the responsibility to delineate major floodplains in support of the National Flood Insurance Program. As part of the effort, FEMA defines the base flood resulting from a storm having a one percent probability of occurring in any one year. These areas are commonly referred to as the 100-year floodplain. Areas located within floodplains are subject to FEMA National Floodplain Insurance Program requirements. Areas with a 0.2 percent probability of occurring in any one year are referred to as the 500-year floodplain. The VA recommends all new buildings to be located outside of the 500-year floodplain. According to the FEMA Flood Insurance Rate Map (FIRM) Panels 47157C0220G and 47157C0215G (effective date February 2, 2015), the Proposed Action is located within an Area of Minimal Flood Hazard (Zone X), in an area determined to be outside of both the 100-year and 500-year floodplains.

EO 11990, *Protection of Wetlands*, requires federal agencies to minimize the destruction, loss, or degradation of wetlands, and to preserve and enhance the natural and beneficial values of wetlands. EO 11990 requires federal agencies to avoid to the extent possible the long- and short-term adverse impacts associated with the destruction or modification of wetlands and to avoid direct or indirect support of new construction in wetlands wherever there is a practicable alternative.

As discussed in Section 3.5, federal and state agencies are also required to prevent impacts to Waters of the U.S. (including wetlands) under the CWA. Wetlands are defined by the USACE as those areas “that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions.”

Substantial impacts to wetlands may require an individual permit. Under Section 404(e) of the CWA, the USACE can issue general permits to authorize activities that have minimal individual and cumulative adverse environmental effects. A Nationwide Permit is a general permit, issued by the USACE that authorizes activities across the country. Projects that only minimally affect wetlands may meet the conditions of one of the existing Nationwide Permits. A Water Quality Certification or waiver pursuant to Section 401 of the CWA is required for Section 404 permit actions; this certification or waiver is issued by TDEC.

The Aquatic Resources Alteration Permit program and the CWA Section 401 Water Quality Certification program are both administered by TDEC for regulatory protection for wetlands in accordance with the state's stormwater management program. In addition, TDEC has established erosion and sedimentation control regulations and a permitting system for controlling erosion and sedimentation from land disturbing activities.

According to the National Wetlands Inventory (NWI) there are no wetlands on the proposed site. The NWI data show four wetlands within a few hundred feet of the site. The nearest NWI wetland feature is a small 2.3-acre pond that may also serve as a storm water detention pond about 70 feet north of the site. There is a forested, riverine wetland associated with an unnamed tributary to Hall Branch east of the site and another constructed pond a few hundred feet southeast of the site. Finally, there is a forested wetland complex about 500 feet southwest of the site. A site visit conducted by EnSafe in October 2018 confirmed that no wetlands are present at the site.

3.9.2 Environmental Consequences

3.9.2.1 Proposed Action

According to the FIRMs, NWI data, and a site survey conducted on October 2, 2018 the Proposed Action would not occur in any floodplains or wetlands; therefore, no direct impacts to any floodplains or wetlands are expected. Soil erosion best BMPs will be implemented to control storm water runoff and reduce soil erosion from the site reduce any chances of indirect adverse effects to floodplains or wetlands.

3.9.2.2 No Action Alternative

Under the No Action Alternative, the Proposed Action would not occur and no impacts to floodplains or wetlands would result.

3.10 Socioeconomics and Environmental Justice

Socioeconomics can be defined as the analysis of the human environment related to economic and social conditions. The purpose of a socioeconomic analysis is to assess the probable impact of a Proposed Action on local economic and social resources. Socioeconomic indicators, such as population, housing, and regional economic activity inform the assessment of socioeconomic and are utilized to understand the community affected by the Proposed Action.

EO 12898 requires federal agencies to achieve environmental justice by identifying and addressing disproportionately high and adverse human health and environmental effects, including the interrelated social and economic effects of their programs, policies, and activities on minority and low-income populations. Identifying the size and location of low-income and minority population groups aids in assessing whether a given project will disproportionately burden or fail to meet the needs of any segment of the population under consideration. Socioeconomic indicators, such as race, personal income levels, and employment, inform the assessment of environmental justice. This section examines the potential impacts to socioeconomic and environmental justice that could occur as a result of the Proposed Action.

3.10.1 Existing Environment

The Proposed Action is located within Census Tracts 208.20, 209, and 208.10 in the Town of Arlington in Shelby County, Tennessee (Census 2017). According to the U.S. Census Bureau, the Town of Arlington consists of 23.06 square miles. The 2017 population of the Town of Arlington was estimated as 11,696. The race of a person living in Arlington in 2017 consists of 79 percent white, 15.1 percent black or African American, 2.2 percent Hispanic or Latino, 2.0 percent Asian, 2.8 percent of the population identifying as two or more races.

According to the U.S. Census Bureau's 2012 to 2016 American Community Survey 5-Year Estimates, the number of veterans living in the Town of Arlington was 707 and the median annual household income of \$96,363 compared to a U.S. average of \$55,322. Additional data for the same period indicates 1.7 percent of people in Arlington are at the poverty level compared to 12.3 percent in the U.S. (Census 2017).

To better address environmental justice concerns, the EPA has developed an environmental justice mapping and screening tool called EJSCREEN. It is based on nationally consistent data (including 2017 U.S. Census data) and an approach that combines environmental and demographic indicators in maps and reports (EPA 2015b). By entering the location of the Proposed Action, the tool provides demographic and environmental information for area associated with the Proposed Action.

The screening tool provides the State of Tennessee, EPA Region 4 and national environmental justice (EJ) Indexes (in percentile) for the selected 1.5-mile radius area of the Project Site (Appendix D). EJ Indexes are compiled from eight environmental indicators, such as air quality standards and proximity to large emission sources. The EJ Indexes are presented in percentiles to provide perspective on how the Proposed Action area compares to the State, EPA Region 4, and nation. The population residing within 1.5 miles of the Proposed Action is calculated using U.S. Census block data. The buffer ring aggregates appropriate portions of the intersecting Census block groups, weighted by population, to create a representative set of data for the entire ring area. For each environmental or demographic indicator, the result is a population-weighted average, which equals the Census block group indicator values averaged over all residents who are estimated to be inside the 1.5-mile buffer. Eight individual environmental indicators, used to develop the EJ Indexes, and six demographic indicators, such as percentage of minority and low-income populations, are used to develop a single Demographic Index.

The results of the screening report did not identify a high percentage of minority or low-income populations, when compared with State, EPA Region 4 or national populations (Appendix D). In addition, potential environmental quality issues or combinations of environmental and demographic indicators were not identified as unusual when compared to State, EPA Region 4, or national values. The screening tool does not, by itself, determine the existence or absence of environmental justice concerns. However, when these results are taken into consideration with the scope of the Proposed Action, further consideration of environmental justice issues does appear to be warranted.

3.10.2 Environmental Consequences

3.10.2.1 Proposed Action

The Proposed Action would have no significant effect on population size, demographics, or income levels associated with the Town of Arlington or Shelby County. The Proposed Action would not introduce disproportionately high and adverse human health and environmental effects on the surrounding population. The Proposed Action may have minor short-term and long-term beneficial impacts on assisted housing available for veterans and on employment and local economic activity. A minor and short-term increase in employment could occur if the retained contractor hires additional local crew members. A minor and long-term increase in employment could occur if the proposed employees associated with the operation of the Proposed Action are hired from the local area.

3.10.2.2 No Action Alternative

Under the No Action Alternative, the facility would not be constructed. Any potential revenue and employment increases associated with the construction of the Proposed Action, would not be realized.

3.11 Solid Waste and Hazardous Materials

Solid waste management primarily relates to the availability of systems and landfills to support a population's short-term and long-term needs. Hazardous materials are substances that pose a threat to human health or the environment. This section examines the impacts of the Proposed Action on solid waste and hazardous materials.

3.11.1 Existing Environment

In September 2019 EnSafe completed a Phase I Environmental Site Assessment (ESA) of the Project Site (EnSafe 2019). The Phase I ESA documented that residential cottages, gymnasium, educational and training buildings at the Project Site were demolished in 2015. Prior to demolition activities, limited hazardous materials surveys largely focusing on asbestos were performed at these structures. Based on observations made during site visits, and review of project documents, it appears that no remnants of these materials remain onsite. Additionally, EnSafe did not observe stained soils or readily visible signs of contamination.

The Phase I ESA also documented that the Project Site was listed on the Leaking Underground Storage Tank, Underground Storage Tank (UST), State Remediation Program, and Voluntary Cleanup Program databases. According to TDEC files, the Arlington Developmental Center used two 10,000-gallon diesel USTs located together on the southwest portion of the Project Site. The two heating oil USTs were installed in 1969 and removed on October 15, 2015; initial tank pit soil sample results were above regulatory limits. The tank pit was over-excavated and confirmation results indicated successful over-excavation and concentrations were below TN UST guidelines. Over-excavated material appears to have been transported off-site. In January 2016 the TDEC Division of Remediation stated no additional action was required at that time regarding the UST closure.

3.11.2 Environmental Consequences

3.11.2.1 Proposed Action

The Proposed Action would result in the short-term generation and transportation of solid waste in the form of typical construction-related debris. Solid waste generated during construction of the Proposed Action would be managed by the retained contractor. Construction waste associated with the Project Action is anticipated to be minimal and would be managed in accordance with TDEC, Division of Solid Waste Management requirements. Adverse impacts are not expected and

the generation of solid waste due to construction of the Proposed Action is considered negligible. Adverse impacts are not expected and the generation of hazardous materials due to construction of the Proposed Action is considered negligible.

Under the Proposed Action, solid waste would be generated due to routine operations, on a long-term basis. Solid waste at a skilled care facility generally consists of routine office waste and biomedical waste. Such wastes would be managed in accordance with federal and state regulations.

The increased solid waste generation due to the Proposed Action would be a minor contributor to overall solid waste generation and would not significantly alter the quantities or characteristics of solid wastes generated in the area. Adverse impacts are not expected and the generation of solid waste due to operation of the Proposed Action is considered negligible.

Under the Proposed Action, minimal quantities of hazardous materials may be stored at the facility (e.g. fluorescent bulbs, batteries, cleaning supplies). Disposal of biohazardous material, such as spent needles, may result from routine operation of the Proposed Action. Hazardous materials may also potentially be brought onsite by contractors on an as-needed basis for activities such as pest control and weed management. These activities would be serviced by contractors or by onsite personnel in accordance with material specifications and applicable laws and would not result in adverse impacts. Any hazardous materials utilized in these areas would be stored in accordance with material specifications and applicable laws. Adverse impacts are not expected and the generation of hazardous materials due to routine operation of the Proposed Action is considered negligible.

The Proposed Action is anticipated to include the installation of twin emergency generators that may require diesel fuel to operate. Should diesel be selected as a fuel source, each generator may include an indoor 100 gallon, double-wall day tanks with pumps and an outdoor, aboveground or underground, 1500-gallon, dual wall with containment fuel tank and dual pumps and alarms to provide a minimum of 24 hours runtime for both generators at 100 percent capacity. The operation and maintenance of the generators, as well as the storage of fuel would comply with the State of Tennessee requirements and would not result in adverse impacts.

The Proposed Action is anticipated to result in negligible impacts to solid waste and hazardous materials due to operation associated with the Proposed Action. As such, measures to mitigate for the impacts to solid waste and hazardous materials are not presently proposed.

3.11.2.2 No Action Alternative

Under the No Action Alternative, facility construction would not occur, with no construction-related or operational-related solid waste and hazardous material generation.

3.12 Transportation and Parking

The siting of new infrastructure requires an analysis of existing public transportation options and anticipated impacts based on the Proposed Action. This section examines the impacts of the Proposed Action on transportation and parking.

3.12.1 Existing Environment

One condition considered by the TSVH for site suitability included proximity to viable downtown or commercial centers. The Proposed Action would be proximal to commercial centers in Arlington, as well as Cordova, Germantown, Bartlett and metropolitan Memphis. The Project Site would be served by Elm Park Street, Memphis Arlington Road, Milton Wilson Drive, and Interstate 269 (State Route 385, Paul Barrett Parkway). The Project Site is located approximately one-half mile north of the Interstate 40-Interstate 269 (State Route 385, Paul Barrett Parkway) interchange, in Arlington, Tennessee. Impacts to these thoroughfares were considered to assess the suitability of the Proposed Action. A portion of Elm Park Street is located within the Project Site boundary. The composite site plan included as Appendix A indicates Elm Park Street will be used in the Proposed Action.

3.12.2 Environmental Consequences

3.12.2.1 Proposed Action

An increase in traffic in the area, primarily on Memphis Arlington Road, Milton Wilson Drive, and Elm Park Street will result from the Proposed Action, relative to the No Action Alternative. The Proposed Action is anticipated to have a negligible increase on the quality of traffic flow on Interstate 40, and Interstate 269 (State Route 385, Paul Barrett Parkway). The proposed entrance/exit for Project Site will be Elm Park Street. Most of the construction-related vehicle activity would be concentrated in the beginning and ending of the work day. The Project Site does not cross a roadway and is not located near sensitive pedestrian uses such as a school, bus stop, or hospital.

The VA design goal for Proposed Action is to provide an approximate 126-bed facility (Orcutt | Winslow 2019). The operation of the Proposed Action would account for the increase in traffic due to the veterans served at the facility as well as the staffing of the facility. The Proposed Action would be constructed to accommodate adequate parking for the staff and visitors to the facility. The composite site plan included as Appendix A indicates 142 parking spaces (128 standard and 14 handicap-accessible)

would be included in the design with space to accommodate up to 20 future standard parking spaces, if an additional housing facility is added. The operation of the Proposed Action would lead to an increase in traffic in the area relative to the No Action Alternative. However, based on the relative size of the Proposed Action and the residential surrounding area, traffic impacts are considered negligible. As such, traffic control devices are not proposed for operation of the Proposed Action.

The Proposed Action would result in negligible impacts to transportation due to construction and operation-related traffic; therefore, mitigation measures are not currently proposed.

3.12.2.2 No Action Alternative

Under the No Action Alternative, the Proposed Action would not occur and no impacts to transportation or parking would result

3.13 Utilities and Community Service

The siting of new infrastructure requires utility services such as electric, communication, and water utilities. In addition to utility services, public infrastructure requires community services such as education, medical, fire, police, and recreation. Impacts to fire and rescue services were considered for the purpose of assessing the Proposed Action. Impacts to solid waste utilities were discussed previously in Section 3.11. This section examines the impacts of the Proposed Action on utilities and community services.

3.13.1 Existing Environment

Currently, the Project Site is cleared and is currently supplied with electrical and water utility infrastructure. Utility upgrades would be necessary to construct the Proposed Action. The electrical domestic water and sanitary sewer water utility provider is Memphis Light, Gas and Water Division. Communication utilities are provided to the region by Xfinity. Community service providers, for the evaluation of the Proposed Action, include the Shelby County Sheriff's Office and the Town of Arlington Fire Department.

3.13.2 Environmental Consequences

3.13.2.1 Proposed Action

Limited electrical and water utility infrastructure is currently present at the Project Site. Construction and operation of the Proposed Action would require utilities to support the facility and irrigation system.

Utilities capable of supporting the Proposed Action are proposed. The construction and long-term operation of the Proposed Action would have a negligible impact on utilities. It is not known if natural gas service is available at the site; however, if available, natural gas, may be the preferred fuel for two emergency generators for the proposed facilities. The utilities in the area have sufficient capacity to serve the Proposed Action without reducing service levels to existing customers; therefore, there would be no impacts on utilities from the Proposed Action.

Some of the utilities that originally served the site remain intact following the demolition of the previous buildings; however, their condition has not been determined since they remain buried (Orcutt | Winslow 2019). An existing sanitary sewer line that connects to the city sewer system runs through the site. It should be possible to connect into the sewer line without an extension of the public sewer main. Also, according to old design documents, there is a water line loop on the site. It should be possible to connect into the existing water line without a public main extension, as well.

Operation of the Proposed Action would require long-term community service resources. The Proposed Action would not require a significant increase in police or fire and rescue personnel; therefore, there would be a negligible impact to community services from the Proposed Action.

3.13.2.2 No Action Alternative

Under the No Action Alternative, the Proposed Action would not occur and no impacts to utilities or community services would result.

4.0 CUMULATIVE IMPACTS AND MITIGATION MEASURES

4.1 Cumulative Impacts

The CEQ regulations stipulate that the cumulative impacts of a Proposed Action should be considered. The CEQ defines cumulative impacts as “the incremental impacts of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes such other actions” (40 CFR 1508.7). Cumulative impacts can result from individually minor, but collectively substantial, actions undertaken over a period by various agencies (federal, state, and local) or individuals. This section considers the cumulative impacts resulting from projects that are proposed, under construction, recently completed, or anticipated to be implemented in the reasonably foreseeable future.

For the purposes of this analysis, the Project Site, adjoining parcels and the Town of Arlington and the adjacent City of Lakeland were identified as the geographic scope for the cumulative effect analysis. Identification of projects for the cumulative effects analysis was developed through the consultation with the City of Arlington and other agencies consulted as part of this EA, and identified in Section 3.

There are several ongoing construction projects underway or planned in Arlington. These include projects sponsored by the Town, residential and commercial developments, and road improvement projects funded by the Town and/or Tennessee Department of Transportation. Only three projects are currently underway within a 0.5-mile radius of the proposed veterans' home site.

Arlington Tennis Complex

The Town of Arlington approved construction of a 6-court tennis facility adjacent to State Route 385 along Memphis Arlington Road near the intersection with Milton Wilson Road, approximately 0.4 mile north of the proposed State Veterans' Home site. Construction of the facility is underway; the projected completion date is late fall 2019.

Arlington Middle School Gym

Arlington Community Schools is constructing a new, expanded gymnasium at Arlington Middle School. The gym should be ready for use in August 2019. The school is located approximately 0.5 miles northwest of the proposed State Veterans' Home site.

Myer's Park Planned Development

Construction has begun on Myer's Park, a mixed-use planned development on 38.5 acres of Light Industrial District land at Memphis Arlington Road and Gerber Road, approximately 0.5 mile north of the proposed State Veterans' Home site. The project includes primarily detached single-family homes, with 9 acres of common open space, and a small mixed-use center fronting Memphis Arlington Road with neighborhood-serving retail, office, and residential lofts.

Other related projects that could occur in the future include construction of another State Veterans' Home in Memphis and possible additional construction properties on the State-owned land associated with the former Arlington Developmental Center. According to the Memphis Commercial Appeal (March 31, 2017) efforts were underway to raise local-match funds to support construction of a \$90 million, 144-bed, skilled nursing facility for military veterans in Memphis, similar in scope to the Arlington State Veterans Home. The VA would not build the new state veterans' home until completing the Arlington facility.

The Tennessee Department of General Services indicated that they could support additional construction projects for state agencies at the former Arlington Developmental Center site. Possible projects could include construction of modern office facilities for state employees and/or a new district headquarters for the Tennessee Highway Patrol.

Table 3 provides a summary of impacts to resources as they pertain to the Proposed Action. No significant cumulative adverse impacts to any resources are anticipated.

Table 3 Summary of Impact Analysis			
Resource Area	Construction Short-Term*	Operation Long-term*	No Action Alternative
Aesthetics	Minor Adverse	No impact	No Impact
Air Quality	Minor Adverse	Minor Adverse	No Impact
Cultural Resources	No Impact	No Impact	No Impact
Geology and Soils	Minor Adverse	No Impact	No Impact
Hydrology and Water Quality	Minor Adverse	No Impact	No Impact
Wildlife and Habitat	Minor Adverse	Minor Adverse	No Impact
Noise	Minor Adverse	No Impact	No Impact
Land Use	No Impact	No Impact	No Impact
Floodplains and Wetlands	Minor Adverse	No Impact	No Impact
Socioeconomics and Environmental Justice	Minor Beneficial	Minor Beneficial	Minor Adverse
Solid Waste and Hazardous Materials	No Impact	No Impact	No Impact
Transportation and Parking	No Impact	No Impact	No Impact
Utilities and Community Service	No Impact	No Impact	No Impact
Potential for Generating Substantial Controversy	No Impact	No Impact	No Impact

Notes:

* = Short-term is defined as the construction period and long-term is defined as typically greater than 5 years.

4.2 Mitigation Measures

Measures to mitigate for the effects of potential adverse impacts to resources identified in Section 3 are described below.

Air Quality

BMPs will be required of contractors relative to fugitive dust and air emissions during the construction of the Proposed Action. Various methods of controlling fugitive dust include the use of water or wetting agents on exposed disturbed areas and soil stockpile areas, periodic sweeping and daily rinsing of truck tires. Methods of air emission control include maintenance of portable generators, on-site machinery, and vehicles and BMPs such as reducing idling of heavy equipment when possible. Contractors would be responsible for maintaining all construction equipment and adherence to state and federal regulations controlling diesel emissions.

Cultural Resources

Although no adverse effects to cultural resources were identified, appropriate measures will be in place if any previously undocumented cultural resources are discovered during construction. If subsurface deposits believed to be cultural or human in origin are discovered during construction, then all work must halt within a 100-foot radius of the discovery. Local law enforcement, the medical examiner and TDOA must be notified immediately, and appropriate measures would be implemented to mitigate any adverse impact.

Geology and Soils

While there is potential for damage to Project Site buildings during a major earthquake, ground motion and liquefaction cannot be predicted. Buildings should be constructed according to the recommended seismic provisions in the most recent building codes for new buildings (Federal Emergency Management Agency, 2014). There are no other significant geologic hazards associated with the Project Site (Cramer et al., 2014; USGS, 2004).

Soil erosion and sedimentation impacts will be minimized through implementation of construction BMPs and conformance with NPDES/MS4 permit requirements. In addition, A Construction Stormwater General Permit and SWPPP is required by TDEC. The Construction Stormwater General Permit and SWPPP will control storm water runoff and soil erosion at the site during any land disturbance activities.

Appropriate NPDES/MS4 permitting would be obtained by the contractor, prior to construction activities, and BMPs, including but not limited to watering, silt fences, waddles, and re-vegetation of disturbed areas with native grasses would be carried out to reduce fugitive dust and erosion from disturbed sites and soil stockpile areas.

Hydrology and Water Quality

The mitigation measures identified for impacts to geology and soils would also be employed to mitigate for impacts to hydrology and water quality due to erosion and sedimentation.

In addition, fertilizers and pesticide applications to establish and maintain facility landscaping should be conducted to the minimum extent necessary and in accordance with manufacturer specifications, resulting in minimal impacts to surface water and groundwater resources.

Wildlife and Habitat

The mitigation measures identified for impacts to geology and soils and hydrology and water quality would also be employed to mitigate for impacts to wildlife and habitat due to erosion and sedimentation.

Noise

A combination of institutional and engineering controls would mitigate nuisance noise during the operation of the new facility. To the extent possible routine facility repairs and grounds maintenance would occur during daylight hours. Noise from the emergency generator would be controlled using mufflers and by locating the generator away from sleeping quarters.

Floodplains and Wetlands

The BMPs identified to control storm water runoff and soil erosion will prevent any adverse impact to floodplains and wetlands.

5.0 CONCLUSIONS

This EA has been prepared pursuant to NEPA to evaluate the environmental impacts associated with the Proposed Action. The Proposed Action comprises the funding, construction and operation of the Tennessee State Veterans' Home at Arlington located on a 28.65-acre, state-owned property located in Arlington, Shelby County, Tennessee. The design goal of the Proposed Action includes an estimated 125,054-SF, 126-bed skilled nursing facility comprised of a 3-building complex, main entrance, parking and roadways, perimeter fencing, utilities, landscaping and irrigation system.

This EA describes the following resource areas and assesses the potential for the Proposed Action to affect these resources areas: aesthetics, air quality; cultural resources; geology and soils; hydrology and water quality; wildlife and habitat; noise; land use; floodplains and wetlands; socioeconomics and environmental justice; solid waste and hazardous materials; transportation and parking; utilities and community service. The Proposed Action would result in some short-term (construction) and long-term (operation) impacts to resources. However, no significant impacts to resource areas are anticipated.

Based on the analysis presented in this EA and coordination to date with project agencies, the Proposed Action is expected to have no significant impacts to the assessed resource areas, and potential minor impacts would be avoided or mitigated through the implementation of BMPs and compliance with existing regulatory processes. This EA concludes an EIS is not required and a FONSI is appropriate.



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Tennessee State Veterans' Homes

7.0 ABBREVIATIONS AND ACRONYMS

-A-A-

amsl Above mean sea level

-B-B-

BMP Best management practices

-C-C-

CAA Clean Air Act CAA
CEQ Council on Environmental Quality
CFR Code of Federal Regulations
CWA Clean Water Act

-D-D-

dba A-weighted decibel
DNL Day-Night Sound Level

-E-E-

EA Environmental Assessment
EIS Environmental Impact Statement
EJ Environmental Justice
EO Executive Order
EPA United States Environmental Protection Agency

-F-F-

FEMA Federal Emergency Management Agency
FPPA Farmland Protection Policy Act
FIRM Flood Insurance Rate Map
FONSI Finding of No Significant Impact

-G-G-

GHG Greenhouse gases

-H-H-

HUD US Department of Housing and Urban Development

-M-M-

msl Mean sea level

MS4 Municipal Separate Storm Sewer System

-N-N-

NAAQS National Ambient Air Quality Standards

NEPA National Environmental Policy Act

NHPA National Historic Preservation Act

NOA Notice of Availability

NPDES National Pollutant Discharge Elimination System

NRCS Natural Resources Conservation Service

NRHP National Register of Historic Places

NPS National Park Service

-P-P-

PM10 Particulate matter less than ten microns in diameter

PM2.5 Particulate matter less than 2.5 microns in diameter

-S-S-

SF Square Feet

SHCGP State Home Construction Grant Program

SHPO State Historic Preservation Office

SWPPP Stormwater Pollution Prevention Plan

-T-T-

TDA	Tennessee Department of Agriculture
TDEC	Tennessee Department of Environment and Conservation
TDIDD	Tennessee Department of Intellectual and Developmental Disabilities
TDNA	Tennessee Division of Natural Areas
TDOA	Tennessee Division of Archaeology
TSVH	Tennessee State Veterans' Homes
THC	Tennessee Historical Commission

-U-U-

US	United States
USACE	United States Army Corps of Engineers
USDA	United States Department of Agriculture
USFWS	United States Fish and Wildlife Service
UST	Underground Storage Tank

-V-V-

VA	Veterans Affairs
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Appendix A
West Tennessee Veterans' Nursing Home
Programming Verification

WEST TENNESSEE VETERANS' NURSING HOME

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Nashville, TN 37209
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C:\Revt\Projects\2019\2019_002_VTNVNH_Arch_V2019_Jacobson.Lvt

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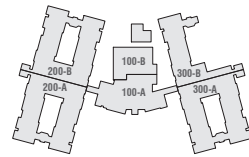
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KEYPLAN



VICINITY MAP



LOCATION MAP



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- G-002 PROJECT CODE DATA
- G-003 L&E DETAILS
- G-004 WALL TYPES
- G-100 LIFE SAFETY - OVERALL PLAN
- G-101 OCCUPANCY - OVERALL PLAN
- G-111 LIFE SAFETY - BUILDING 100 - PART A
- G-112 LIFE SAFETY - BUILDING 100 - PART B
- G-113 LIFE SAFETY - BUILDING 200 - PART A
- G-114 LIFE SAFETY - BUILDING 200 - PART B
- G-115 LIFE SAFETY - BUILDING 300 - PART A
- G-116 LIFE SAFETY - BUILDING 300 - PART B

CIVIL

- C1.0 EXISTING CONDITIONS
- C2.0 SITE NOTES
- C3.0 INITIAL EROSION CONTROL
- C3.1 INTERMEDIATE EROSION CONTROL
- C3.2 FINAL EROSION CONTROL
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- C4.0 DEMOLITION PLAN
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VETERANS' NURSING HOME

WEST TENNESSEE
11293 Memphis Arlington Road
Arlington, TN 38002

CLIENT CONTACT
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PROJECT NO. 2019_002 | DATE OF ISSUE 07.02.2019

REVISIONS		
NO.	DESCRIPTION	DATE

PROJECT TEAM | DRAWN BY
TN_Senior Living | TJJ

PROJECT PHASE
Schematic Design

SHEET CONTENTS
TITLE SHEET

SHEET NO.

G-000

PROJECT DATA

Building_100

Case No: SBC# 680006-01-2014
Project: West Tennessee Veterans' Nursing Home for State of Tennessee
11293 Memphis Arlington Rd. • Arlington, Tennessee 38002
Owner: State of Tennessee, Department of General Services for Tennessee State Veterans' Homes Board • 312 Rosa L Parks Ave • Nashville, TN 37203
Architect: Orcutt | Winslow • 5016 Centennial Blvd., Third Floor • Nashville, Tennessee 37209
Contractor: EMJ Corporation • 2034 Hamilton Place Blvd., Suite 400 • Chattanooga, TN 37421
Project Submittals: -

GOVERNING CODES AND AGENCIES

Shelby County: 2015 International Building Code, 2014 National Electrical Code/NFPA-70, 2015 International Mechanical Code, 2015 International Plumbing Code, 2015 International Fuel Gas Code, 2015 International Existing Building Code, 2015 International Energy Conservation Code... Tennessee Department of Health: 2012 International Building Code, 2012 International Fuel Gas Code, 2012 International Mechanical Code, 2012 International Property Maintenance Code, 2012 International Fire Code, 2012 ICC Electrical Code-Administrative Provisions, 2012 International Energy Conservation Code, 2010 American Institute of Architects & Facilities Guidelines Institute, Guidelines for Design and Construction of Hospital and Health Care Facilities... National Fire Protection Association, National Fire Codes (2001), as updated by National Fire Codes Supplement Part 1 (2001) and National Fire Codes Supplement Part 2 (2001)...

NEW CONSTRUCTION CODE DATA

Statement of Building Use: Veterans' Nursing Home
Primary Occupancy Group: I-2 Construction Type: Type II-B
Structure: Steel frame structural system with concrete & metal pan deck at floor and roof.
Fire Protection: Total floor and roof thickness = 6", Automatic Sprinkler System provided throughout.
New Construction Area: First Floor 28,388 sq.ft., New Building Area 49,882 sq.ft., Total Building Area 49,882 sq.ft., Total Occupancy: 756
Building Height: Maximum 25 foot Actual Height, Allowable 55 foot Height, Maximum 1 Stories Actual Height, Allowable 1 Story height

OCCUPANCY LOAD AND MEANS OF EGRESS

Table with columns: Description, Group, Occupancy, Occupant Load Factor, Area (sq ft), and Occupants. Rows include: Mech., Storage (9 occupants), Gathering Areas (175 occupants), Dining, Living, Conference (391 occupants), Admin (114 occupants), Kitchen, Laundry (28 occupants), Therapy (9 occupants), Maintenance (30 occupants), Total (756 occupants).

Table with columns: Level, Occupancy, Egress Width Per Person, Exits Req'd, Width Required, and Number of Exits, Width Provided. Row: First Floor, 756, 0.20 inches, 3, 151 inches, 14 exits, 724 inches.

Exits Required: 2 remotely located exits required from sleeping areas over 1,000 sq.ft., or other area over 2,500 sq.ft., or any area over 10 occupants.

Travel Distance: Maximum Path of Travel shall not exceed 200 feet from any point to an Exit.

Corridor Construction: Corridor walls shall be Smoke Partitions and fully sprinkled, with not less than 90" width clear.

Table with columns: Fire Resistive Requirements for Building Elements, Type-II-B, Rated Assembly, and Per Table. Rows include: Primary Structural Frame, Bearing Walls, Nonbearing Walls & Partitions, Per Fire Separation Distance, Nonbearing Walls & Partitions, Floors, Floor-Ceilings and Associated Secondary Members, Roof, Roof-Ceilings and Associated Secondary Members, Shaft Enclosures, Exit Stairway/Exit Passageway Construction.

PROJECT DATA

Building_200

Case No: SBC# 680006-01-2014
Project: West Tennessee Veterans' Nursing Home for State of Tennessee
11293 Memphis Arlington Rd. • Arlington, Tennessee 38002
Owner: State of Tennessee, Department of General Services for Tennessee State Veterans' Homes Board • 312 Rosa L Parks Ave • Nashville, TN 37203
Architect: Orcutt | Winslow • 5016 Centennial Blvd., Third Floor • Nashville, Tennessee 37209
Contractor: EMJ Corporation • 2034 Hamilton Place Blvd., Suite 400 • Chattanooga, TN 37421
Project Submittals: -

GOVERNING CODES AND AGENCIES

Shelby County: 2015 International Building Code, 2014 National Electrical Code/NFPA-70, 2015 International Mechanical Code, 2015 International Plumbing Code, 2015 International Fuel Gas Code, 2015 International Existing Building Code, 2015 International Energy Conservation Code... Tennessee Department of Health: 2012 International Building Code, 2012 International Fuel Gas Code, 2012 International Mechanical Code, 2012 International Property Maintenance Code, 2012 International Fire Code, 2012 ICC Electrical Code-Administrative Provisions, 2012 International Energy Conservation Code, 2010 American Institute of Architects & Facilities Guidelines Institute, Guidelines for Design and Construction of Hospital and Health Care Facilities... National Fire Protection Association, National Fire Codes (2001), as updated by National Fire Codes Supplement Part 1 (2001) and National Fire Codes Supplement Part 2 (2001)...

NEW CONSTRUCTION CODE DATA

Statement of Building Use: Veterans' Nursing Home
Primary Occupancy Group: I-2 Construction Type: Type II-B
Structure: Steel frame structural system with concrete & metal pan deck at floor and roof.
Fire Protection: Total floor and roof thickness = 6", Automatic Sprinkler System provided throughout.
New Construction Area: First Floor 49,882 sq.ft., New Building Area 49,882 sq.ft., Total Building Area 49,882 sq.ft., Total Occupancy: 757
Building Height: Maximum 25 foot Actual Height, Allowable 55 foot Height, Maximum 1 Stories Actual Height, Allowable 1 Story height

OCCUPANCY LOAD AND MEANS OF EGRESS

Table with columns: Description, Group, Occupancy, Occupant Load Factor, Area (sq ft), and Occupants. Rows include: Gathering Areas (391 occupants), Kitchen, Laundry (3 occupants), Resident Houses (363 occupants), Total (757 occupants).

Table with columns: Level, Occupancy, Egress Width Per Person, Exits Req'd, Width Required, and Number of Exits, Width Provided. Row: First Floor, 756, 0.20 inches, 3, 151 inches, 14 exits, 724 inches.

Exits Required: 2 remotely located exits required from sleeping areas over 1,000 sq.ft., or other area over 2,500 sq.ft., or any area over 10 occupants.

Travel Distance: Maximum Path of Travel shall not exceed 200 feet from any point to an Exit.

Corridor Construction: Corridor walls shall be Smoke Partitions and fully sprinkled, with not less than 90" width clear.

Table with columns: Fire Resistive Requirements for Building Elements, Type-II-B, Rated Assembly, and Per Table. Rows include: Primary Structural Frame, Bearing Walls, Nonbearing Walls & Partitions, Per Fire Separation Distance, Nonbearing Walls & Partitions, Floors, Floor-Ceilings and Associated Secondary Members, Roof, Roof-Ceilings and Associated Secondary Members, Shaft Enclosures, Exit Stairway/Exit Passageway Construction.

PROJECT DATA

Building_300

Case No: SBC# 680006-01-2014
Project: West Tennessee Veterans' Nursing Home for State of Tennessee
11293 Memphis Arlington Rd. • Arlington, Tennessee 38002
Owner: State of Tennessee, Department of General Services for Tennessee State Veterans' Homes Board • 312 Rosa L Parks Ave • Nashville, TN 37203
Architect: Orcutt | Winslow • 5016 Centennial Blvd., Third Floor • Nashville, Tennessee 37209
Contractor: EMJ Corporation • 2034 Hamilton Place Blvd., Suite 400 • Chattanooga, TN 37421
Project Submittals: -

GOVERNING CODES AND AGENCIES

Shelby County: 2015 International Building Code, 2014 National Electrical Code/NFPA-70, 2015 International Mechanical Code, 2015 International Plumbing Code, 2015 International Fuel Gas Code, 2015 International Existing Building Code, 2015 International Energy Conservation Code... Tennessee Department of Health: 2012 International Building Code, 2012 International Fuel Gas Code, 2012 International Mechanical Code, 2012 International Property Maintenance Code, 2012 International Fire Code, 2012 ICC Electrical Code-Administrative Provisions, 2012 International Energy Conservation Code, 2010 American Institute of Architects & Facilities Guidelines Institute, Guidelines for Design and Construction of Hospital and Health Care Facilities... National Fire Protection Association, National Fire Codes (2001), as updated by National Fire Codes Supplement Part 1 (2001) and National Fire Codes Supplement Part 2 (2001)...

NEW CONSTRUCTION CODE DATA

Statement of Building Use: Veterans' Nursing Home
Primary Occupancy Group: I-2 Construction Type: Type II-B
Structure: Steel frame structural system with concrete & metal pan deck at floor and roof.
Fire Protection: Total floor and roof thickness = 6", Automatic Sprinkler System provided throughout.
New Construction Area: First Floor 40,305 sq.ft., New Building Area 40,305 sq.ft., Total Building Area 40,305 sq.ft., Total Occupancy: 604
Building Height: Maximum 25 foot Actual Height, Allowable 55 foot Height, Maximum 1 Stories Actual Height, Allowable 1 Story height

OCCUPANCY LOAD AND MEANS OF EGRESS

Table with columns: Description, Group, Occupancy, Occupant Load Factor, Area (sq ft), and Occupants. Rows include: Gathering Areas (307 occupants), Kitchen, Laundry (3 occupants), Resident Houses (294 occupants), Total (604 occupants).

Table with columns: Level, Occupancy, Egress Width Per Person, Exits Req'd, Width Required, and Number of Exits, Width Provided. Row: First Floor, 756, 0.20 inches, 3, 151 inches, 14 exits, 724 inches.

Exits Required: 2 remotely located exits required from sleeping areas over 1,000 sq.ft., or other area over 2,500 sq.ft., or any area over 10 occupants.

Travel Distance: Maximum Path of Travel shall not exceed 200 feet from any point to an Exit.

Corridor Construction: Corridor walls shall be Smoke Partitions and fully sprinkled, with not less than 90" width clear.

Table with columns: Fire Resistive Requirements for Building Elements, Type-II-B, Rated Assembly, and Per Table. Rows include: Primary Structural Frame, Bearing Walls, Nonbearing Walls & Partitions, Per Fire Separation Distance, Nonbearing Walls & Partitions, Floors, Floor-Ceilings and Associated Secondary Members, Roof, Roof-Ceilings and Associated Secondary Members, Shaft Enclosures, Exit Stairway/Exit Passageway Construction.



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PROJECT NO. DATE OF ISSUE
2019_002 07.02.2019

REVISIONS
DATE DESCRIPTION DATE

PROJECT TEAM DRAWN BY
TN_Senior Living TJJ
PROJECT PHASE
Schematic Design
SHEET CONTENTS
PROJECT CODE DATA

SHEET NO.
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LIFE SAFETY LEGEND

(Symbol: Blue dashed line)	ABLE TO RESIST PASSAGE OF SMOKE
(Symbol: Red dashed line)	1 HOUR FIRE
(Symbol: Green dashed line)	1 HOUR FIRE / SMOKE
(Symbol: Yellow dashed line)	2 HOUR FIRE / SMOKE
(Symbol: Purple dashed line)	2 HOUR FIRE / SMOKE
(Symbol: Blue dashed line)	3 HOUR FIRE / SMOKE
(Symbol: Red dashed line)	3 HOUR FIRE / SMOKE
(Symbol: Green dashed line)	4 HOUR FIRE / SMOKE
(Symbol: Yellow dashed line)	4 HOUR FIRE / SMOKE
(Symbol: Purple dashed line)	SMOKE BARRIER
(Symbol: Blue dashed line)	FIRE EXTINGUISHER CABINET
(Symbol: Red dashed line)	FIRE EXTINGUISHER
(Symbol: Green dashed line)	FIRE HOSE VALVE CABINET OR STANDPIPE CONNECTION
(Symbol: Yellow dashed line)	FIRE ALARM ANNUNCIATOR PANEL
(Symbol: Purple dashed line)	FIRE DEPARTMENT CONNECTION
(Symbol: Blue dashed line)	EXIT STAIR
(Symbol: Red dashed line)	EXIT
(Symbol: Green dashed line)	AREA OF RESCUE
(Symbol: Yellow dashed line)	EXIT ACCESS CORRIDOR
(Symbol: Purple dashed line)	EGRESS PATH TRAVEL DISTANCE
(Symbol: Blue dashed line)	1. PATH TO SMOKE COMPARTMENT
(Symbol: Red dashed line)	2. PATH TO BUILDING EXIT
(Symbol: Green dashed line)	SMOKE COMPARTMENT LABEL
(Symbol: Yellow dashed line)	BUILDING NUMBER
(Symbol: Purple dashed line)	HORIZONTAL EXIT
(Symbol: Blue dashed line)	DOOR EGRESS CAPACITY
(Symbol: Red dashed line)	DOOR CLEAR WIDTH (IN)
(Symbol: Green dashed line)	ALLOWABLE OCCUPANTS
(Symbol: Yellow dashed line)	IMAGINARY PROPERTY LINE

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SMOKE COMPARTMENT LEGEND

(Symbol: Blue hatched)	1-A	(Symbol: Green hatched)	2-A	(Symbol: Yellow hatched)	3-A
(Symbol: Red hatched)	1-B	(Symbol: Purple hatched)	2-B	(Symbol: Blue hatched)	3-B
(Symbol: Green hatched)	1-C	(Symbol: Yellow hatched)	2-C	(Symbol: Purple hatched)	3-C

EXIT CAPACITY

EXIT DOOR #	CLEAR WIDTH	CAPACITY FACTOR	OCCUPANT CAPACITY
BUILDING 100			
1-CORIG	42"	0.2	220
1-EXT1A	69"	0.2	360
1-EXT1B	34"	0.2	180
1-EXT1C	69"	0.2	360
1-EXT1D	69"	0.2	360
1-EXT1E	36"	0.2	178
1-EXT1F	34"	0.2	180
1-EXT1G	69"	0.2	360
1A-100A	52"	0.2	262
1B-135	42"	0.2	220
1B-136A	34"	0.2	180
TOTAL			2500
BUILDING 200			
2A-COR6	42"	0.2	220
2B-COR6C	36"	0.2	181
2B-COR6D	99"	0.2	494
2B-COR7	42"	0.2	220
TOTAL			1115
BUILDING 300			
3A-COR3	34"	0.2	180
3A-COR6	42"	0.2	220
3B-COR6C	36"	0.2	181
3B-COR6D	99"	0.2	494
3B-COR7	42"	0.2	220
TOTAL			1295
TOTAL EXITS	19		4910

OCCUPANCY CALCULATIONS

OCCUPANCY TYPE	AREA	AREA/PERSON	# OF OCCUPANTS
BUILDING 100			
ACC. STORAGE	2,640 SF	300 SF	8
ASSEMBLY - CONCENTRATED	2,815 SF	7.5 SF	402
ASSEMBLY - UNCONCENTRATED	2,843 SF	15 SF	177
BUSINESS	11,582 SF	100 SF	116
COMMERCIAL	5,438 SF	200 SF	27
INPATIENT TREATMENT	2,003 SF	240 SF	8
SHOP	1,896 SF	50 SF	38
TOTAL	38,636 SF		368
BUILDING 200			
ASSEMBLY - UNCONCENTRATED	5,884 SF	15 SF	390
COMMERCIAL	544 SF	200 SF	2
SLEEPING AREAS	43,490 SF	120 SF	362
TOTAL	49,898 SF		754
BUILDING 300			
ASSEMBLY - UNCONCENTRATED	4,995 SF	15 SF	307
COMMERCIAL	534 SF	200 SF	2
SLEEPING AREAS	15,710 SF	120 SF	291
TOTAL	11,239 SF		600

PATHS OF TRAVEL

PATH	TRAVEL DISTANCE
1A-E	129'-6"
1A-S	137'-8"
1B-S	130'-10"
1B-S	164'-7"
1C-E	197'-8"
2A-E	145'-10"
2A-S	155'-4"
2B-E	116'-5"
2B-S	125'-0"
2C-E	146'-10"
2C-S	155'-4"
3A-E	145'-10"
3A-S	184'-7"
3B-E	116'-5"
3B-S	125'-0"
3C-E	146'-10"
3C-S	155'-4"

SMOKE COMPARTMENT SCHEDULE

SMOKE COMPARTMENT	AREA	MAX. TRAVEL DIST.
BUILDING 100		
1-A	10,680 SF	156'-0"
1-B	15,818 SF	139'-9"
1-C	2,141 SF	197'-8"
BUILDING 200		
2-A	13,754 SF	155'-5"
2-B	22,082 SF	125'-0"
2-C	13,754 SF	155'-5"
BUILDING 300		
3-A	7,765 SF	184'-7"
3-B	18,503 SF	125'-0"
3-C	13,754 SF	155'-5"

- CODE GENERAL NOTES**
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 - Fire sprinklers and the alarm system shall comply with NFPA No. 13. Submit all required drawings and information to A-E.P. Prior to commencement of any related work. Obtain approval of completed systems prior to final acceptance.



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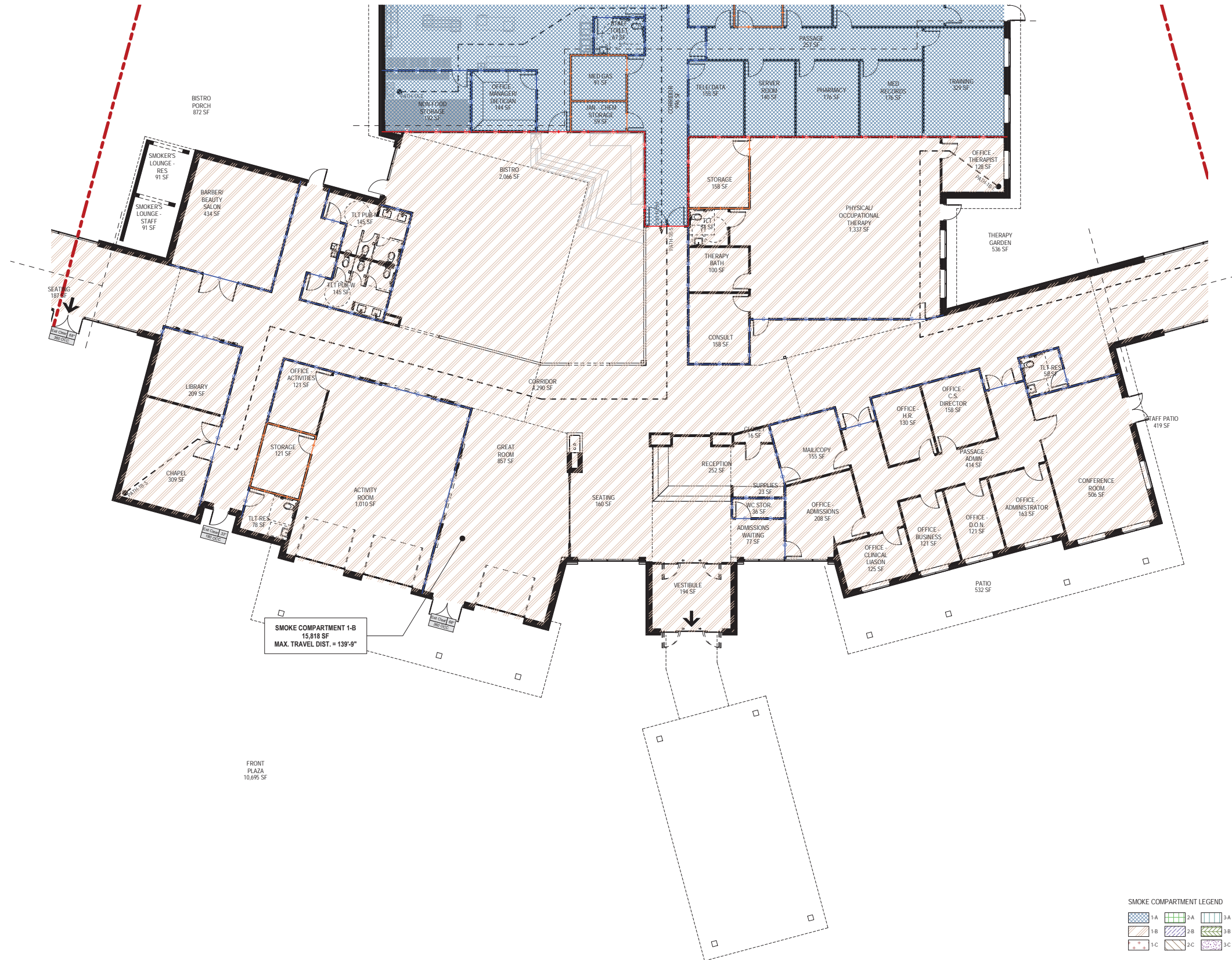
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PROJECT TEAM: TN_Senior Living
 DRAWN BY: Author

PROJECT PHASE: Schematic Design

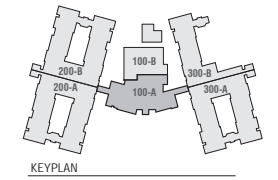
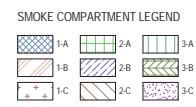
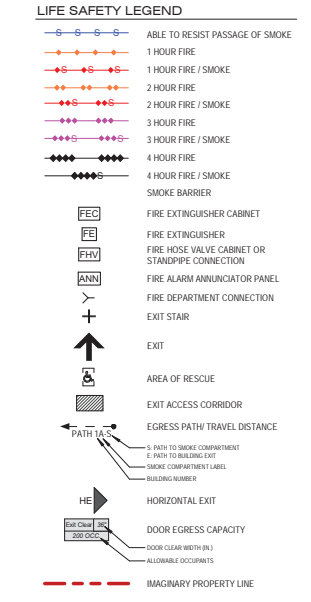
SHEET CONTENTS: LIFE SAFETY - OVERALL PLAN

SHEET NO. **G-100**



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LIFE SAFETY PLAN - BUILDING 100 - PART A



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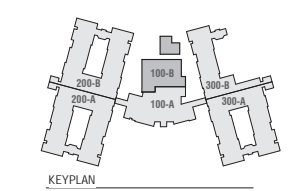
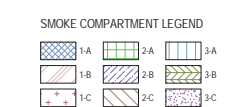
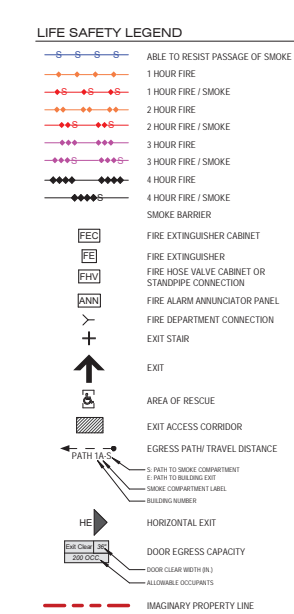
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LIFE SAFETY PLAN - BUILDING 100 - PART B

0 8' 16' 24'
 1/8" = 1'-0"

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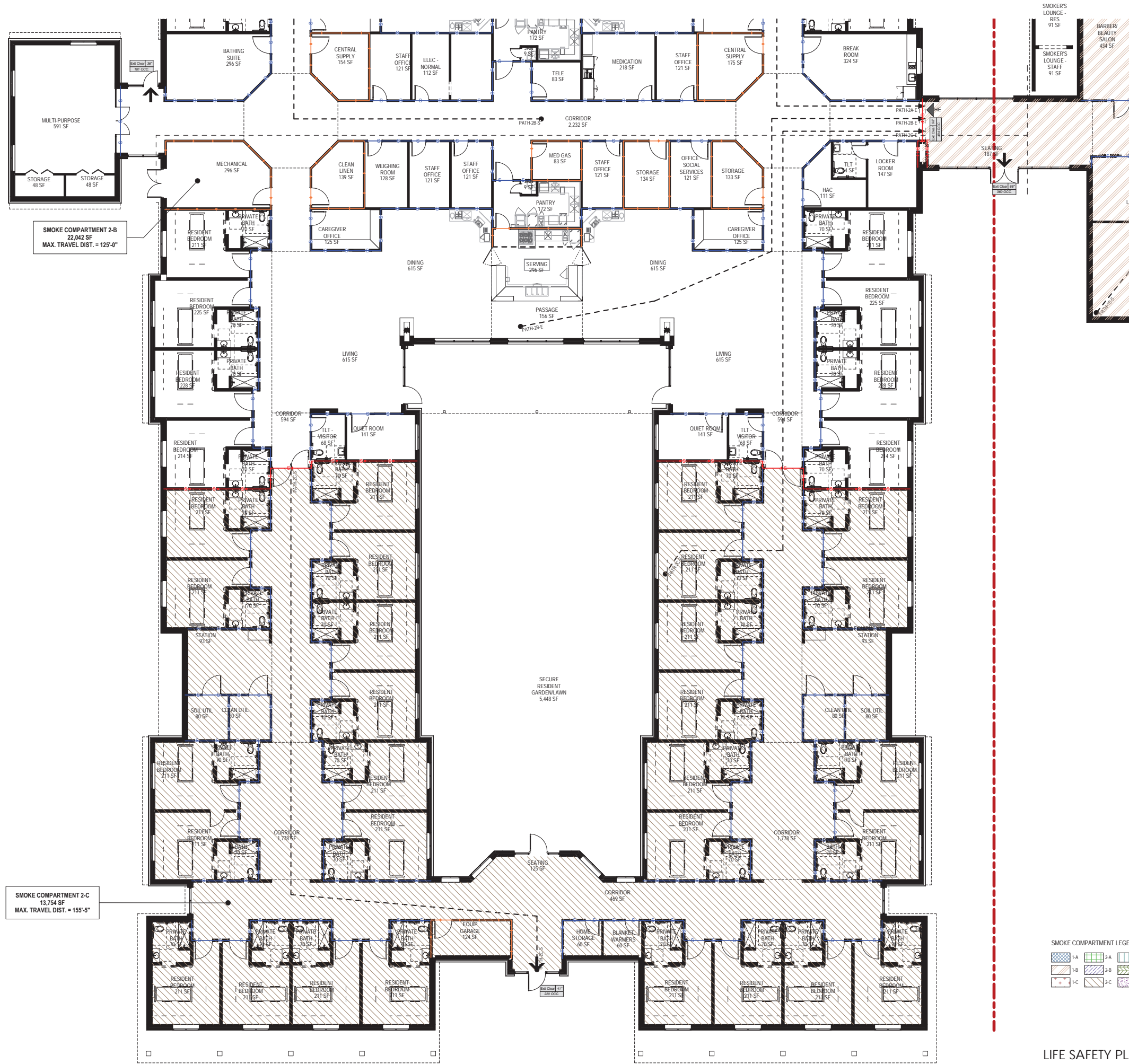
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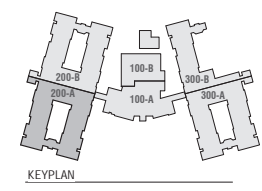
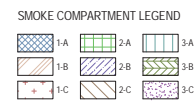
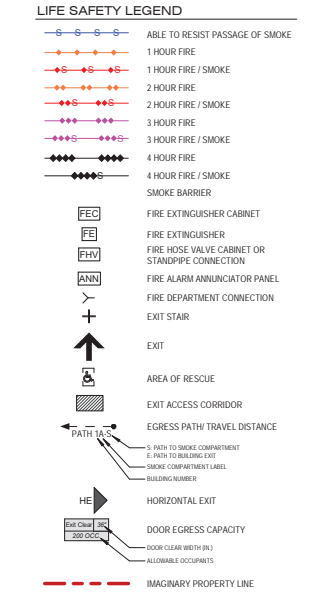
SHEET CONTENTS
 LIFE SAFETY - BUILDING 100 - PART B

SHEET NO.



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LIFE SAFETY PLAN - BUILDING 200 - PART A



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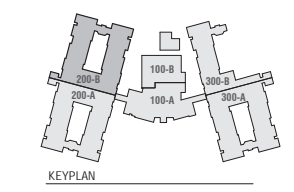
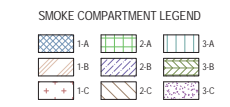
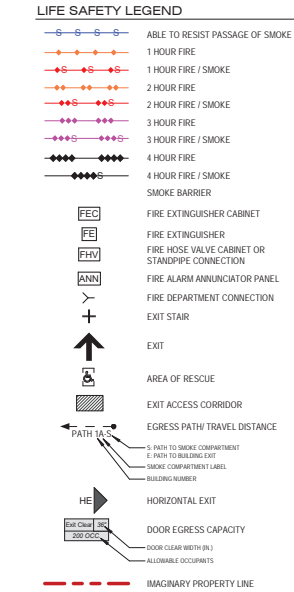
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LIFE SAFETY PLAN - BUILDING 200 - PART B

0 8' 16' 24'

1/8" = 1'-0"

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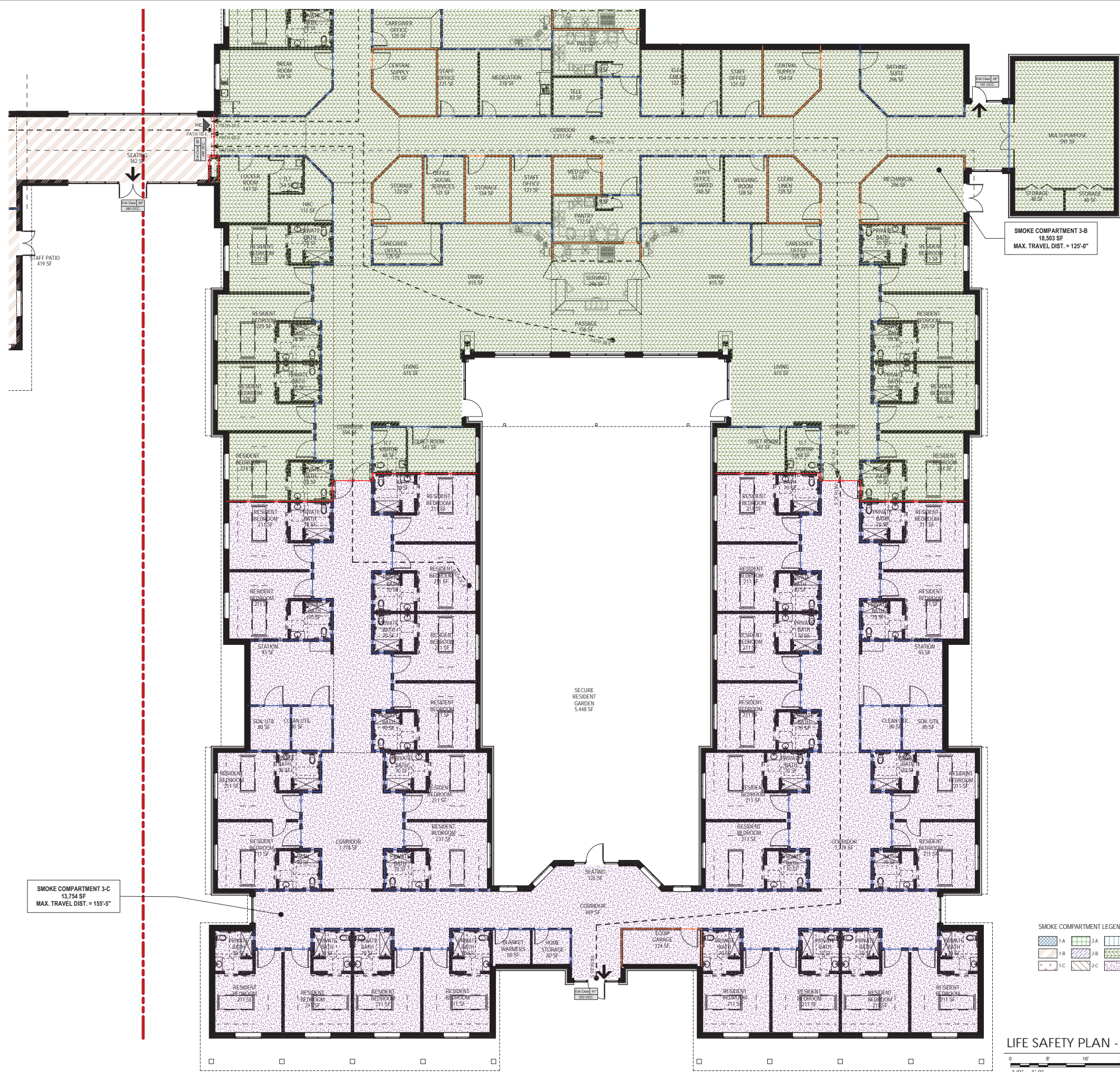
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PROJECT PHASE
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 LIFE SAFETY - BUILDING 200 - PART B

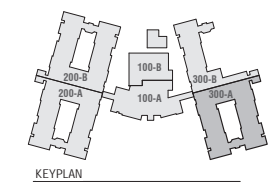
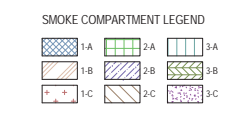
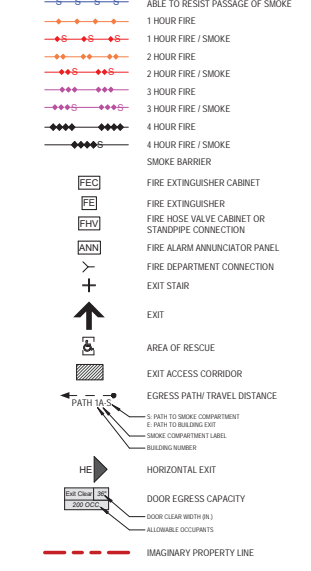
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LIFE SAFETY LEGEND



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PROJECT TEAM TN_Senior Living
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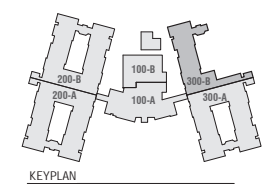
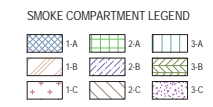
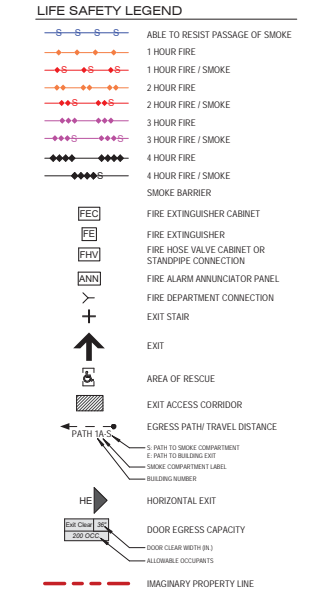
PROJECT PHASE Schematic Design
SHEET CONTENTS LIFE SAFETY - BUILDING 300 - PART A

SHEET NO. G-115



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LIFE SAFETY PLAN - BUILDING 300 - PART B

0 8' 16' 24'

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PROJECT TEAM DRAWN BY
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PROJECT PHASE
 Schematic Design

SHEET CONTENTS
 LIFE SAFETY - BUILDING 300 - PART B

SHEET NO.

G-116

**Johnson and Margaret
 Johnson Trust
 per 02035997**



PARKING SCHEDULE

STANDARD SPOTS:	128
HC SPOTS:	14
CURRENT TOTAL:	142
FUTURE SPOTS:	90
FUTURE TOTAL:	182

- SITE PLAN GENERAL NOTES**
- Contractor shall remove all existing vegetation, site improvements, etc. whether or not specifically indicated on the drawings to facilitate the completion of all required new work. Contractor shall visit the site and verify all quantities and items that are required to be removed prior to submittal of this proposal.
 - Slope all grades and pavement away from building(s) to provide positive drainage, unless noted otherwise.
 - Finish grade at sidewalks, buildings, etc., as required to provide smooth transition to grade.
 - Angles indicated are 45 degrees unless noted otherwise.
 - Construction debris shall be removed from the site on a continuing basis for the duration of construction.
 - Concrete walls shall have expansion joints at a maximum spacing of 20 feet OC and control joints at 5 feet OC, unless noted otherwise.
 - Perform all clearing, grubbing and earthwork in accordance with the Geotechnical Report, unless more restrictive requirements exist.
 - Should slopes of greater than 1:20 (5%) occur at pavement locations, notify architect immediately.
 - All processed imported fill material shall be tested by a qualified testing agency to verify that it meets all specification requirements prior to placing on site.
 - Dimensions are to outside face of stem walls/foundations unless noted otherwise.
 - All areas disturbed by construction, staging, etc. shall be restored to their original condition by the General Contractor. General Contractor is responsible for documenting original condition.
 - All sidewalks at building entryways shall be "keyed" into building slab to prevent differential movement.

KEYNOTES - SITE

FIRST FLOOR - SITE PLAN
 1" = 50'

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PROJECT TEAM TN_Senior Living **DRAWN BY** TJJ

PROJECT PHASE Schematic Design

SHEET CONTENTS ARCHITECTURAL SITE PLAN

SHEET NO. AS-101



- DEPARTMENT LEGEND**
- ACTIVITY
 - ADMINISTRATION
 - CIRCULATION
 - EXTERIOR
 - KITCHEN
 - LAUNDRY
 - MECHANICAL
 - RESIDENT
 - STAFF
 - SUPPORT
 - THERAPY
 - UTILITY
- CIRCULATION**
- STAFF CIRCULATION
 - PUBLIC/VISITOR CIRCULATION
 - RESIDENT CIRCULATION
 - STAFF ONLY AREAS

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WEST TENNESSEE
VETERANS' NURSING HOME
 11293 Memphis Arlington Road
 Arlington, TN 38002

CLIENT CONTACT
 Richard Yaras - Dev. Manager
 312 Rosa L. Parks Ave.
 Nashville, TN 37243
 615-351-0198 T Richard.C.Yaras@tn.gov

PROJECT NO. 2019_002 **DATE OF ISSUE** 07.02.2019

REVISIONS

NO.	DESCRIPTION	DATE

PROJECT TEAM **DRAWN BY**
 TN_Senior Living TJJ

PROJECT PHASE
 Schematic Design

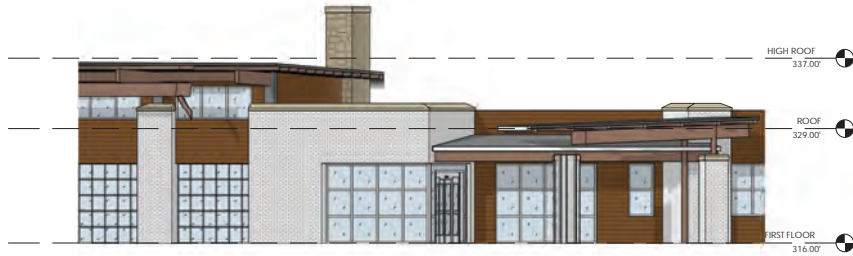
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 FIRST FLOOR OVERALL PLAN

SHEET NO.
A-001

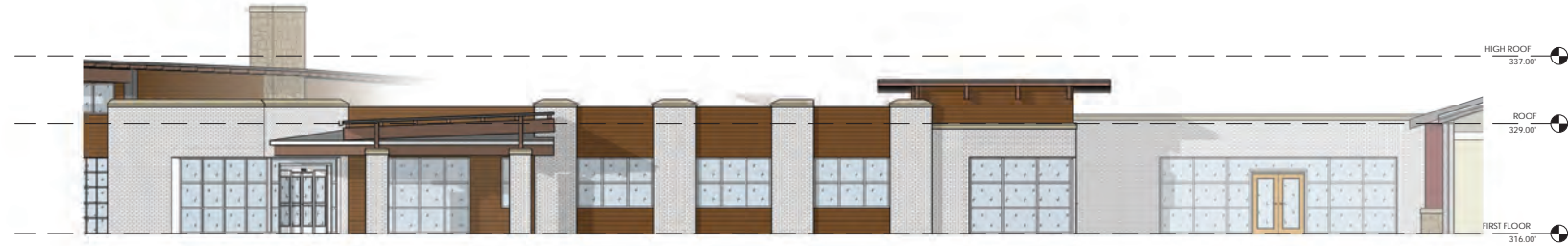




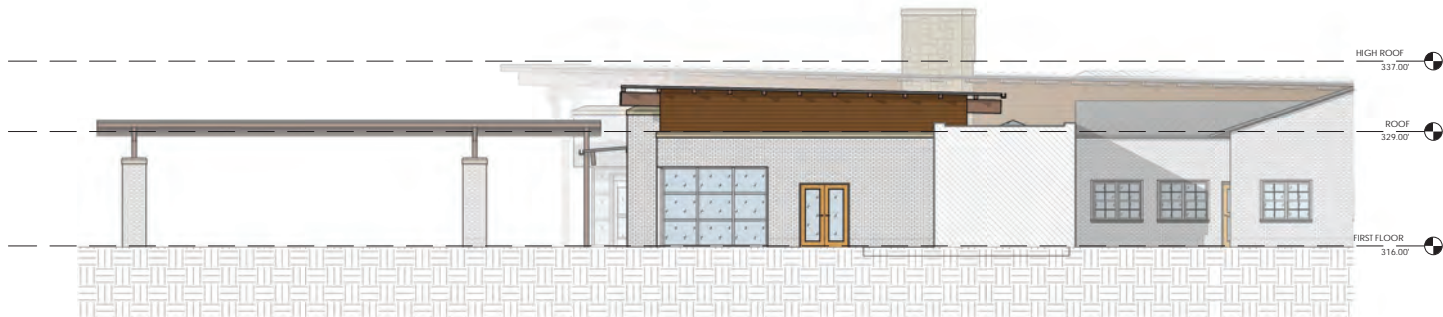
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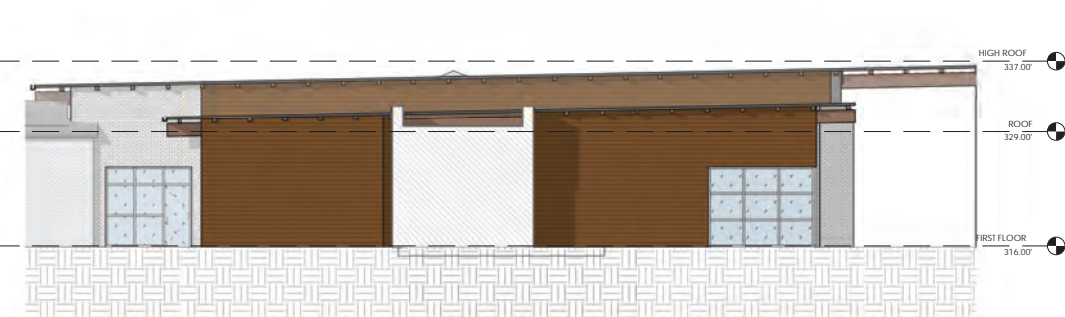
2 BUILDING 100 - FRONT - 2



3 BUILDING 100 - FRONT - 3



4 BUILDING 100 - SIDE - 1



5 BUILDING 100 - SIDE - 2



We warrant that these architectural drawings and specifications were prepared by us or under our direct supervision and control. We warrant that these drawings and specifications were prepared by us or under our direct supervision and control. We warrant that these drawings and specifications were prepared by us or under our direct supervision and control. We warrant that these drawings and specifications were prepared by us or under our direct supervision and control. We warrant that these drawings and specifications were prepared by us or under our direct supervision and control.

WEST TENNESSEE
VETERANS' NURSING HOME
 11293 Memphis Arlington Road
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CLIENT CONTACT
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 312 Rosa L. Parks Ave.
 Nashville, TN 37243
 615-351-0198 T Richard.C.Yaras@tn.gov

PROJECT NO. 2019_002 DATE OF ISSUE 07.02.2019

REVISIONS

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PROJECT TEAM TN_Senior Living DRAWN BY TJJ

PROJECT PHASE Schematic Design

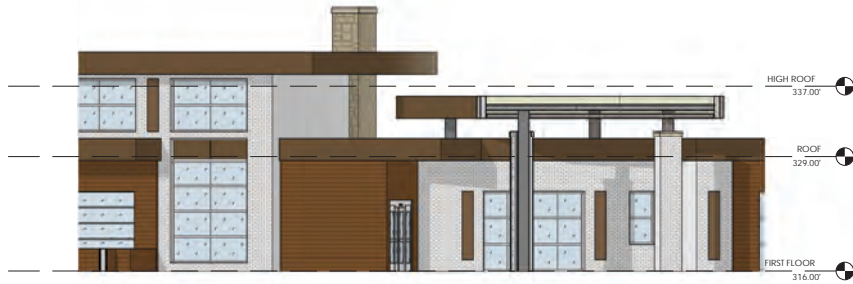
SHEET CONTENTS BUILDING ELEVATIONS - MEMPHIS MODERN

SHEET NO. A-201-A

7/3/2019 8:59:10 AM | orcutt | winslow | 2019_002 | VETERANS' NURSING HOME - WEST TENNESSEE / SCHEMATIC DESIGN / A-201-B-BUILDING ELEVATIONS - DAVE'S PRAIRIE / TJJ
 C:\Revit\Projects\2019\2019_002_WTVNH_Arch_V2019_Jacobson.Lvt



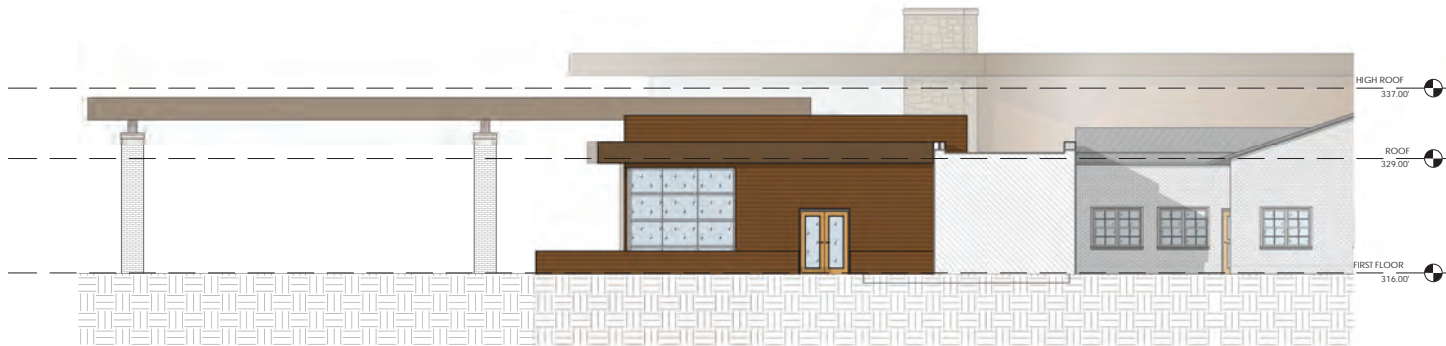
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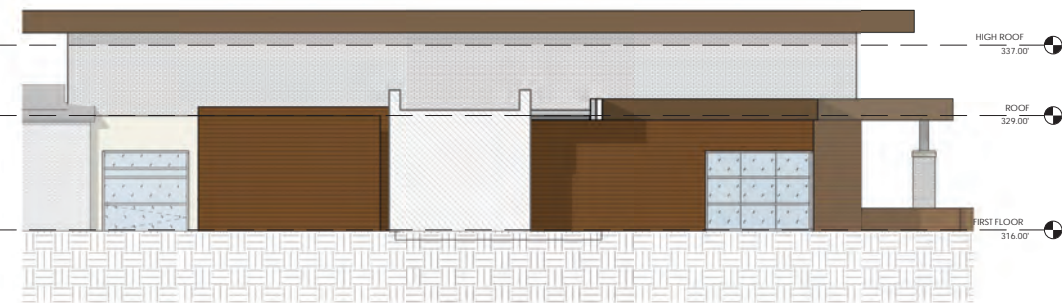
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3 BUILDING 100 - FRONT - 3
 Scale is 1/8" = 1'-0" when printed full size.



4 BUILDING 100 - SIDE - 1
 Scale is 1/8" = 1'-0" when printed full size.



5 BUILDING 100 - SIDE - 2
 Scale is 1/8" = 1'-0" when printed full size.



5016 Centennial Blvd
 third floor
 Nashville, TN 37209
 mail@owp.com
 615.298.2025 t
 www.owp.com

NOT FOR CONSTRUCTION

WEST TENNESSEE
VETERANS' NURSING HOME
 11293 Memphis Arlington Road
 Arlington, TN 38002

CLIENT CONTACT
 Richard Yaras - Dev. Manager
 312 Rosa L. Parks Ave.
 Nashville, TN 37243

615-351-0198 T Richard.C.Yaras@tn.gov

PROJECT NO. DATE OF ISSUE
 2019_002 07.02.2019

REVISIONS

NO.	DESCRIPTION	DATE

PROJECT TEAM DRAWN BY
 TN_Senior Living TJJ

PROJECT PHASE
 Schematic Design

SHEET CONTENTS
 BUILDING ELEVATIONS -
 DAVE'S PRAIRIE

SHEET NO.

A-201-B



1 BUILDING 100 - FRONT - 1
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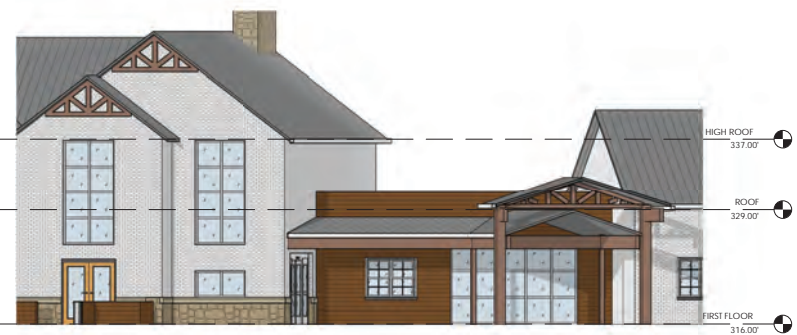


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NOT FOR CONSTRUCTION

orcutt | winslow

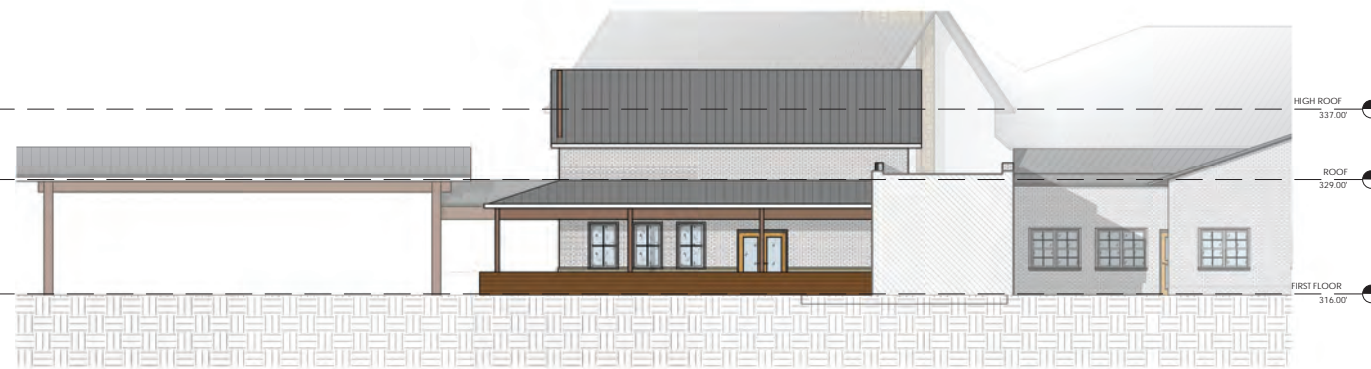
This drawing has been prepared for the project and is intended to be used only for the project and is not to be used for any other purpose. It is not to be used for any other purpose without the written permission of the architect. The architect shall not be responsible for any errors or omissions in this drawing. The architect shall not be responsible for any errors or omissions in this drawing. The architect shall not be responsible for any errors or omissions in this drawing.



2 BUILDING 100 - FRONT - 2
Scale is 1/8" = 1'-0" when printed full size.



3 BUILDING 100 - FRONT - 3
Scale is 1/8" = 1'-0" when printed full size.



4 BUILDING 100 - SIDE - 1
Scale is 1/8" = 1'-0" when printed full size.



5 BUILDING 100 - SIDE - 2
Scale is 1/8" = 1'-0" when printed full size.



WEST TENNESSEE
VETERANS' NURSING HOME

11293 Memphis Arlington Road
Arlington, TN 38002

CLIENT CONTACT
Richard Yaras - Dev. Manager
312 Rosa L. Parks Ave.
Nashville, TN 37243

615-351-0198 T Richard.C.Yaras@tn.gov

PROJECT NO. DATE OF ISSUE
2019_002 07.02.2019

REVISIONS
DATE DESCRIPTION

PROJECT TEAM DRAWN BY
TN_Senior Living TJJ

PROJECT PHASE
Schematic Design

SHEET CONTENTS
BUILDING ELEVATIONS -
SOUTHERN CHARM

SHEET NO.
A-201-C



Appendix B
Agency Scoping Letters and Correspondence



Tennessee State Veterans' Homes Board

"Proudly Serving Those Who Served"

PO Box 11328, Murfreesboro, Tennessee 37129

Phone (615) 225-1816 * Fax (615) 898-1619

February 5, 2019

**Subject: Request for Information and Comments
Tennessee State Veterans' Home
11293 Memphis Arlington Road
Arlington, Tennessee
FAI# 47-018 Arlington, TN**

The Tennessee State Veterans' Homes Board (TSVHB) proposed to construct a new veteran's skilled nursing facility on property located in Arlington, Shelby County Tennessee. The purpose of the proposed action is to provide additional high-quality skilled nursing facilities to eligible veterans in West Tennessee. The need is generated by the current population of approximately 66,000 veterans in Shelby, Fayette, and Tipton Counties of West Tennessee.

The U.S. Department of Veterans Affairs (VA) will partially fund the proposed action through the State Home Construction Grant Program. Although the lead agency for an environmental assessment (EA) is usually a federal agency, the VA's State Home Construction Grant Program defers the preparation of the EA and the decision whether to issue a Finding of No Significant Impact to TSVHB. Since the primary funding source for this project is the VA, the TSVHB will conduct an environmental review of the proposed action under the National Environmental Policy Act (NEPA). We are writing to ask you for any information you may have on the TSVHB's proposed new veteran's facility and to request your comments so that we may perform the environmental review process.

In general accordance with NEPA, VA guidance, and the Department of Veterans Administration environmental rules at 38 CFR Part 26, the TSVHB is preparing an EA that evaluates the potential environmental impacts of the proposed facility construction project and alternatives to the proposal. The TSVHB is gathering information on the project area and project-related issues and concerns. Information collected will assist in preparing the appropriate NEPA document for the proposed project.

DESCRIPTION OF THE TENNESSEE VETERANS HOME

The proposed facility will be located on state-owned property approximately one half mile north of the Interstate 40 — Interstate 269 (State Route 385) interchange, in Arlington, Tennessee approximately 27 miles northeast of downtown Memphis, Tennessee. The Project Site would be served by Elm Park Street via Cypress Creek Drive and Memphis Arlington Road or Milton Wilson Drive. The Site, which is the focus of the EA, is 28.65 acres and shown on figures in Attachment 1. The center of the Site is approximately located at N 35.26805 latitude and W 89.68555 longitude. The Site is currently vacant and mostly grass and shrub covered. Wooded areas exist on the western, southern, and eastern portions. Portions of the Site have historically been used as the Arlington Development Center, a state-run center for the mentally and developmentally disabled, from 1968 to 2010. The Arlington Developmental Center facilities were demolished in 2014. The location of this proposed Site is shown on Figure 1. An aerial photograph of the Site is shown as Figure 2.

The proposed action is anticipated to provide an estimated 116,523 square foot, 126 bed skilled nursing facility. A copy of a draft design is show in Attachment 2. Elements of the final design may vary but are anticipated to include a main skilled nursing facility, main entry feature, roadways and parking, landscaping, irrigation, utilities, and perimeter fencing.

AGENCY CONSULTATION REQUEST

At this time, the TSVHB respectfully requests your comments regarding the proposed facility project. Any information you provide regarding the proposed action will assist TSVHB in determining what environmental issues should be addressed in its environmental review.

Information on additional issues or concerns that you consider appropriate would also be appreciated. Please respond by March 2, 2019 so that we can incorporate your response into the environmental review process, as appropriate. Please submit comments and responses to TSVHB's contractor preparing the EA at the following address:

EnSafe
Attn: Ronald Dow
220 Athens Way, Suite 410
Nashville, Tennessee 37228
rdow@ensafe.com

We appreciate your assistance on this project. If you have any questions, please contact Taylor Wyrick of my staff at (615) 255-1816 or Ronald Dow at EnSafe at (615) 252-2834. Thank you for your assistance.

Sincerely,



Ed Harries, Executive Director
Tennessee State Veterans' Homes Board

cc: Taylor Wyrick, Tennessee State Veterans' Home
Lisa Moore, Department of Veterans Affairs
Glenn Elliott, Department of Veterans Affairs
Brian Hendrickson, State of Tennessee Real Estate Asset Management
Richard Yaras, State of Tennessee Real Estate Asset Management
Laura Waynick, State of Tennessee Real Estate Asset Management

Attachments

**ATTACHMENT 1
FIGURES**

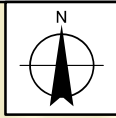



FIGURE 1
VICINITY MAP
PROPOSED TENNESSEE VETERANS' HOME
ARLINGTON, TENNESSEE

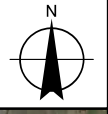
LEGEND
 SUBJECT PROPERTY BOUNDARY

NAD 1983 STATE PLANE
 TENNESSEE FEET
 0 500 1,000
 SCALE IN FEET

REQUESTED BY: JG
 DRAWN BY: AZ
 DATE: 1/24/2019
 PROJECT: 0888823477

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ELM PARK STREET



FIGURE 2
SITE AERIAL PHOTOGRAPH
PROPOSED TENNESSEE VETERANS' HOME
ARLINGTON, TENNESSEE

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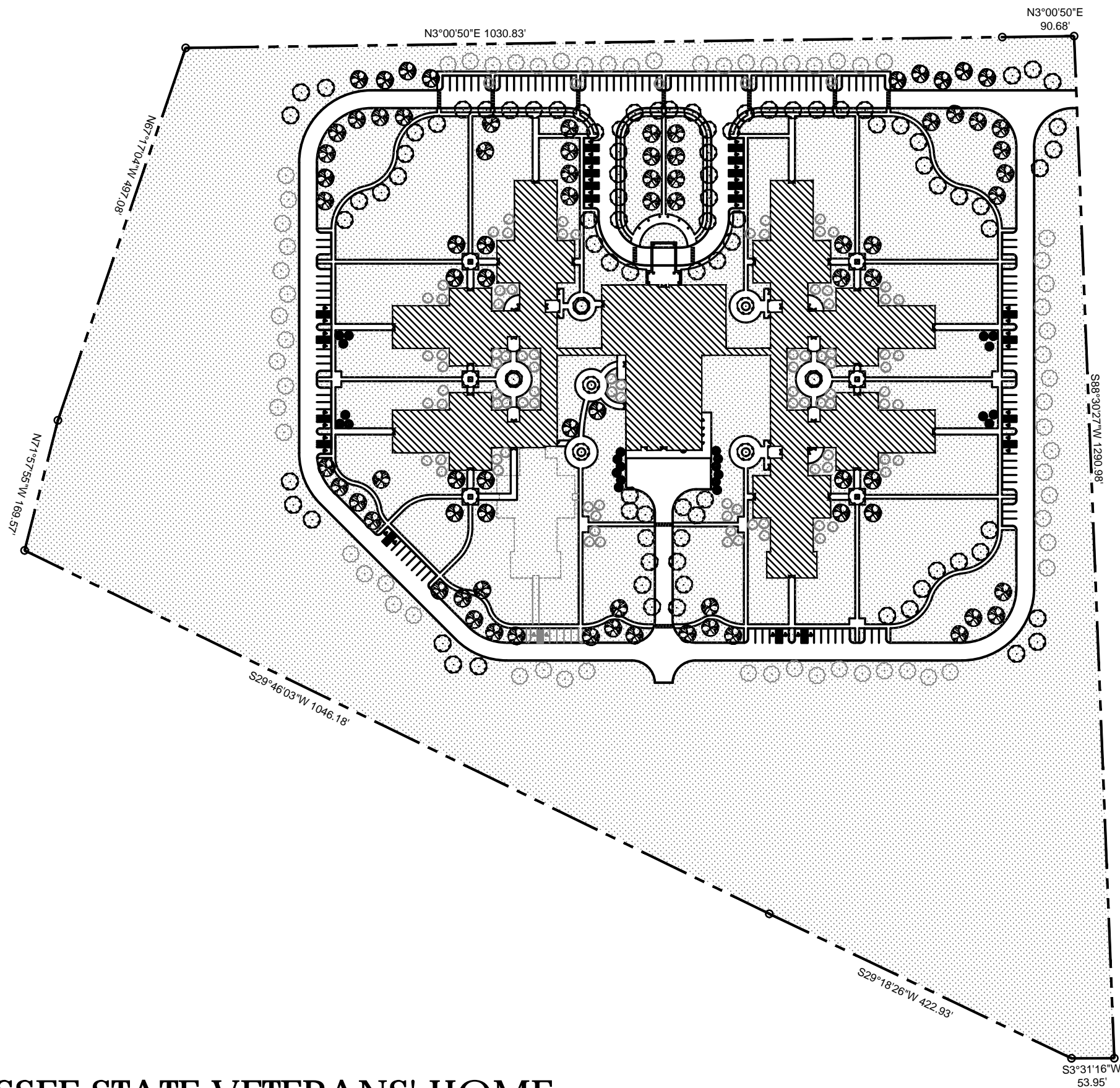
LEGEND
 SUBJECT PROPERTY BOUNDARY

NAD 1983 STATE PLANE
TENNESSEE FEET
0 120 240
SCALE IN FEET

REQUESTED BY: JG
DRAWN BY: AZ
DATE: 1/24/2019
PROJECT: 0888823477

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**ATTACHMENT 2
DRAFT DESIGN DRAWINGS**

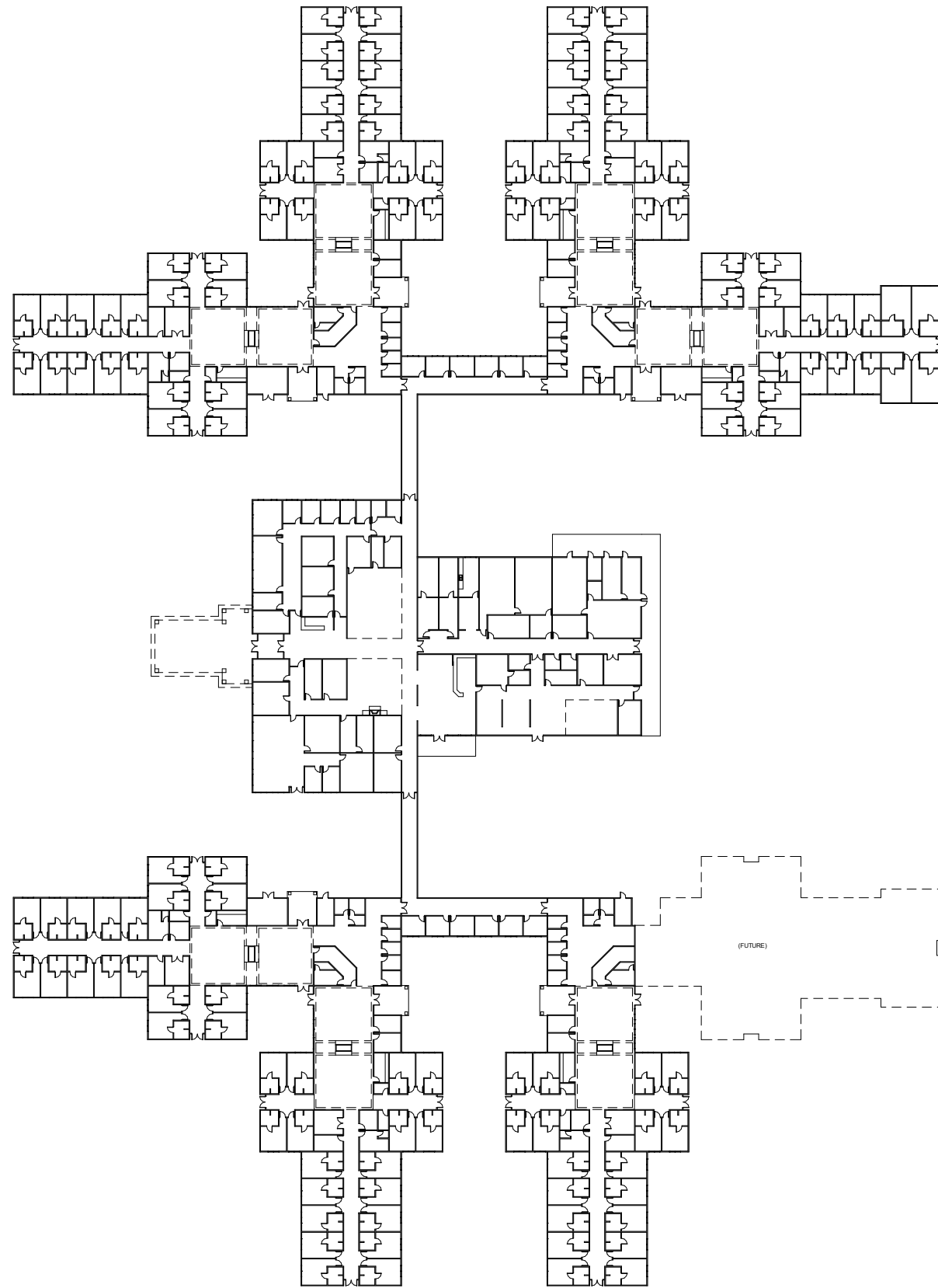


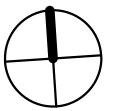
TENNESSEE STATE VETERANS' HOME

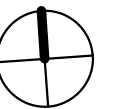
Arlington, Tennessee

COMPOSITE SITE PLAN









Agency Letter Recipient List
Proposed Tennessee Veterans' Home, Arlington, Tennessee
SBC680/001-01-2012
FAI# 47-018 Arlington, TN

Town of Arlington
Mike Wissman, Mayor
5854 Airline Road
P.O. Box 507
Arlington, Tennessee 38002

U.S. Army Corps of Engineers
Memphis District
Attn: Regulatory Branch
167 N. Main Street, B-202
Memphis, Tennessee 38103

Tennessee Department of Environment and Conservation
Ronné Adkins, Ph.D.
Memphis Environmental Field Office
8383 Wolf Lake Drive
Bartlett, Tennessee 38133-4119

Tennessee Department of Environment and Conservation
Division of Natural Areas
Roger McCoy
Director
312 Rosa L. Parks Avenue
Tennessee Tower, 2nd Floor
Nashville, Tennessee 37243

Tennessee Department of Environment and Conservation
Division of Archaeology
Jennifer Barnett
Federal Programs Archaeologist
1216 Foster Avenue
Cole Building #3
Nashville, Tennessee 37243

United States Fish and Wildlife Service
Robbie Sykes
Supervisory Fish and Wildlife Biologist
446 Neal Street
Cookeville, Tennessee 38501

Tennessee Wildlife Resources Agency
Alan Peterson
200 Lowell Thomas Drive
Jackson, Tennessee 38301

State Historic Preservation Officer
E. Patrick McIntyre, Jr.
Executive Director
2941 Lebanon Road
Nashville, Tennessee 37243

Tennessee Department of Transportation
John Hewitt
Environmental Permits Manager
James K. Polk Building, Suite 900
505 Deaderick Street
Nashville, Tennessee 37243

United States Environmental Protection Agency, Region 4
Heinz Mueller
61 Forsyth Street
Atlanta, Georgia 30303

Natural Resources Conservation Service
Meredith Crosby
District Conservationist
80-C South Broad Street
Lexington, Tennessee 38351

Southwest Tennessee Human Resource Agency
Mike Smith
Executive Director
P.O. Box 963
1124 Whitehall Street
Jackson, Tennessee 38301

Shelby County
Lee Harris, County Mayor
Vasco A. Smith, Jr. County Administration Building
160 N Main Street
Memphis, Tennessee 38103

Shelby County Office of Planning and Development
Josh Whitehead, Planning Director
25 North Main Street
Memphis, Tennessee 38104

From: Santamaria, Rafael <Santamaria.Rafael@epa.gov>
Sent: Thursday, February 21, 2019 4:53 PM
To: Ron Dow
Cc: Militscher, Chris
Subject: Request for Information and Comments
Attachments: 2212019TennesseeStateVeteransHomesBoardArlingtonTN.docx

February 21, 2019

EnSafe
Attn: Mr. Ronald Dow
220 Athens Way, Suite 410
Nashville, Tennessee 37228

Subject: Request for Information and Comments
Tennessee State Veterans' Home 11293 Memphis Arlington Road
Arlington, Tennessee
FAI# 47-018 Arlington, TN

Dear Mr. Dow:

We reviewed the above project program in accordance with Section 102(2) (C) of the National Environmental Policy Act and Section 309 of the Clean Air Act. Based upon the preliminary information provided, enclosed you will find a check list with the checked items that may be specifically applicable to your project.

The EPA supports your projects and we thank you for the opportunity to provide comments for your consideration. Should you have questions regarding our comments, you may wish to contact Rafael Santamaria at santamaria.rafael@epamail.epa.gov or at (404) 562-8376 of my staff.

Sincerely,

Christopher A. Militscher
Chief, NEPA Program Office
Resource Conservation and Restoration Division

Enclosure

ENVIRONMENTAL PROTECTION AGENCY REGION 4 NEPA CHECKLIST

Consistent with our responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA), Region 4 offers the following technical comments/recommendations for your consideration/inclusion that could help facilitate your compliance with the Council on Environmental Quality's NEPA implementing regulations at 40 CFR Parts 1500-1508. This checklist may aid you during planning and project development for future Draft Environmental Impact Statements (DEIS), Draft Environmental Assessments (DEA), and related NEPA documents. Based upon the preliminary information provided, **please note that the checked items may be specifically applicable to your project.**

Project Information: Request for Information and Comments
Tennessee State Veterans' Home 11293 Memphis Arlington Road
Arlington, Tennessee
FAI# 47-018 Arlington, TN

PROCESS RELATED ISSUES

Purpose and Need for the Project

The NEPA document should be specific and describe what facilities or portions of the facilities will be constructed, demolished, etc. Clear documentation supporting the need for the proposed project is recommended and how the proposed project will address the identified need.

Alternatives Analysis

The NEPA document should include clear discussions and conclusions why the Preferred Alternative was selected compared to the other alternatives. Include a general discussion on why the 'no action' alternative does not appear to meet the stated purpose and need.

Preferred Alternative

The "Preferred Alternative" should be individually evaluated and assessed (i.e., without solely referencing to the impacts attendant to other alternatives) in the NEPA document.

Avoidance and Minimization Measures

Documentation of any proposed avoidance and minimization measures to aquatic resources (i.e., wetlands and streams) can be important to a project's permitting approvals and should be included in the NEPA document.

Proposed Mitigation

Documentation of proposed compensatory mitigation to replace unavoidable impacts to aquatic resources is important for permitting agency decisions and for public disclosure, and if known, should be included in the NEPA document.

Public Notice and Community Engagement

The NEPA document should be made available for public inspection at various public locations. It would be very beneficial to ensure the public is well informed at all times through frequent public meetings, flyers, announcements and public hearings.

LAND

The NEPA document should include a discussion that addresses demolition and construction debris. The EPA recommends that debris be properly handled by licensed contractors (if needed) and disposed in licensed sanitary landfills for each type of debris in accordance with local and state requirements, as appropriate. For waste recycling initiatives, please see:

<https://www.epa.gov/recycle> .

For construction/demolition projects, the NEPA document should address: proper handling of hazardous materials removal and disposal (e.g., asbestos, polychlorinated biphenyls (PCBs), lead from paint), and proposed waste management measures (e.g., reuse or recycling as opposed to landfill disposal).

The NEPA document should address identified contaminated soils, solid wastes, chemicals and hazardous materials. The EPA recommends that these items be properly handled by licensed contractors and disposed of according to local, state, and Federal requirements. For Resource Conservation and Recovery (RCRA) facilities and Comprehensive Environmental Response, Compensation, and Liability Act, (CERCLA; also known as Superfund) sites, the NEPAassist tool can help identify these locations: <https://www.epa.gov/nepa/nepassist>.

The NEPA document should identify any above ground and/or underground storage tanks (AST/UST), and be evaluated and addressed according to state and Federal requirements.

AIR QUALITY

The NEPA document should address general conformity requirements for the project study area. Please see <https://www.epa.gov/general-conformity>.

Measures to minimize fugitive dusts and other emissions during demolition and/or construction should be addressed in the NEPA document.

WATER QUALITY

The NEPA document should identify any jurisdictional wetlands and/or streams within the project area and any potential impacts to these aquatic resources.

The NEPA document should address any soil disturbance associated with proposed project and measures that are planned to minimize soil erosion and sedimentation (during construction and post-construction).

The addition of impervious surfaces (such as rooftops, parking areas, roadways, etc.) associated with the proposed project can increase stormwater flows. The NEPA document should evaluate stormwater management controls and other minimization measures to reduce offsite flooding.

The NEPA document should identify any designated sole source aquifers and evaluate any potential impacts. Additional information can be found at: <https://www.epa.gov/dwssa>

The NEPA document should address Executive Order 11988 which requires federal agencies to avoid to the extent possible the long and short-term adverse impacts associated with the occupancy and modification of floodplains and to avoid direct and indirect support of floodplain development wherever there is a practicable alternative.

For projects involving wastewater collection and/or treatment facilities, the NEPA document should address any National Pollutant Discharge Elimination System (NPDES) permit program requirements.

OTHER ENVIRONMENTAL ISSUES

Environmental Justice

The NEPA document should address the requirements under Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations. Please see <https://www.epa.gov/ejscreen> .

Measures to minimize any identified adverse and disproportionate impacts to minority and low-income populations should be provided in the NEPA document.

Noise

The NEPA document should include a noise analysis consistent with the Noise Pollution and Abatement Act of 1972. Please see: <https://www.epa.gov/laws-regulations/summary-noise-control-act> .

In addition to any noise analyses to be conducted related to the entire site, the NEPA document should also discuss what noise effects can be attributed to the temporary (Include the type and length of time) demolition and/or construction that will take place on the site and planned measures to abate any adverse noise effects.

Radon Gas

Radon gas can be a significant health concern in buildings and dwellings in certain areas of the U.S. Please see <https://www.epa.gov/radon/epa-map-radon-zones> . The NEPA document should address any local or state requirements pertaining to the implementation of radon-resistant building codes.

Historic Properties and Archeological Sites

Project construction and/or demolition should be performed according to the National Historic Preservation Act of 1966 requirements. Please see: <http://www.achp.gov/106summary.html> . Coordination with the State's Historic Preservation Office (SHPO) or Tribal Historic Preservation Office (THPO) may be required. The identification of historic properties or eligible historic properties should be included in the NEPA document along with any consultation determinations.

Properties should be surveyed for potential archeological sites and projects should comply with the requirements of the Archaeological Resources Protection Act of 1979 and the Native American Graves Protection and Repatriation Act of 1990. Coordination with the SHPO or THPO may be required. Relevant documentation of activities pertaining to archeological resources should be included in the NEPA document.

Tribal

The NEPA document should address impacts to traditional American Indian resources, if any, under the various alternatives. Consultation with the American Indian Tribes/organizations should be made and it should include a list of Tribes and or Native American Indian Organizations consulted about the project along with their comments and any responses.

Threatened and Endangered Species

- The NEPA document should address any potential impacts to threatened and endangered (T&E) species or their critical habitat. A general list of T&E animals can be found at: <https://ecos.fws.gov/ecp0/reports/ad-hoc-species-report?kingdom=V&kingdom=I&status=E&status=T&status=EmE&status=EmT&status=EXPE&status=EXPN&status=SAE&status=SAT&mapstatus=3&fcrithab=on&fstatus=on&fspecrule=on&finvpop=on&fgroup=on&header>Listed+Animals>
- The U.S. Fish and Wildlife Service should be consulted regarding any T&E species or their critical habitat and any consultations with them should be included in the NEPA document.

Prime Farmlands

- The NEPA document should address any potential conversion of prime farmlands. For additional information from the Natural Resources Conservation Service, please see: https://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/nrcseprd1338623.html .

Best Management Practices

Best Management Practices (BMPs) should be identified in the NEPA document. Examples of some BMPs include: Construction activities should be restricted to existing rights-of-way and limited to the areas necessary to meet the project's purpose and need; Structures placed in a floodplain should be constructed to minimize the infiltration/inflow (I/I) of flood waters and should be sturdy enough to withstand the uplift and velocity forces of such waters; Ancillary facilities for wastewater collection systems (e.g., pipelines and pump stations) should be designed so not to impede the natural flow of flood waters; Vegetation replacement of disturbed easement areas should be done with native plant species, wherever possible.

Green Building

For new structures, green building initiatives should be identified in the NEPA document: Examples of some Green building initiatives include: Energy and water conservation (e.g., low flow toilets, energy efficient windows and doors, efficient lighting, etc.); Other pollution prevention measures (e.g., use of materials with recycled content). For additional information, please see: <https://www.epa.gov/smartgrowth/green-building-standards> .

Indirect and Cumulative Impacts

Due to the nature and scope of the proposed project, the EPA recommends that indirect and cumulative impacts also be identified and evaluated in the NEPA document.

Other:



TENNESSEE HISTORICAL COMMISSION
STATE HISTORIC PRESERVATION OFFICE
2941 LEBANON PIKE
NASHVILLE, TENNESSEE 37243-0442
OFFICE: (615) 532-1550
www.tnhistoricalcommission.org

October 18, 2018

Mr. Richard Yaras
TN Department of General Services
Tennessee Tower, 24th Floor
312 Rosa L. Parks Avenue
Nashville, TN 37243

RE: VA / Department of Veteran's Affairs, West TN Veterans Nursing Home, Elm Hill Park St., Arlington, Shelby County, TN

Dear Mr. Yaras:

In response to your request, 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. This Act requires federal agencies or applicant 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).

After considering the documentation submitted, it is our opinion that there are no National Register of Historic Places listed or eligible properties affected by this undertaking. We have made this determination because either: no National Register listed or eligible Historic Properties exist within the undertaking's area of potential effects, the specific location, size, scope and/or nature of the undertaking and its area of potential effects precluded affects to Historic Properties, the undertaking will not alter any characteristics of an identified eligible or listed Historic Property that qualify the property for listing in the National Register, or it will not alter an eligible Historic Property's location, setting or use. We have no objections to your proceeding with your undertaking.

If your agency proposes any modifications in current project plans or discovers any archaeological remains during the ground disturbance or construction phase, 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. If you are applying for federal funds, license or permit, you should submit this letter as evidence of consultation under Section 106 to the appropriate federal agency, which, in turn, should contact us as required by 36 CFR 800. If you represent a federal agency, you should submit a formal determination of eligibility and effect to us for comment. You may direct questions or comments to Jennifer M. Barnett (615) 687-4780. This office appreciates your cooperation.

Sincerely,

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

EPM/jmb



STATE OF TENNESSEE

DEPARTMENT OF ENVIRONMENT AND CONSERVATION

Division of Natural Areas
Natural Heritage Program
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 2nd Floor
Nashville, Tennessee 37243
Phone 615/532-0431 Fax 615/532-0046

February 15, 2019

Ronald Dow
EnSafe
5724 Summer Trees Dr.
Memphis, TN 38134

Subject: TN Veterans' Home
(-89.6854055°W, 35.2680602°N)
Shelby County, TN
Rare Species Database Review

Dear Mr. Dow:

Thank you for your correspondence requesting a rare species database review for the construction of a veterans' home, located in Arlington, Tennessee.

We have reviewed the state's natural heritage database with regard to the project boundaries, and we find that no rare species have been observed previously within one mile and four miles of the project area.

The Division of Natural Areas - Natural Heritage Program has reviewed the location of the proposed project with respect to rare plant species. Based on the habitat within the project area, we do not anticipate any impacts to occurrences of rare, threatened, or endangered plant species. There are no known critical habitats, natural areas, or wildlife management areas near the project area.

We ask that you coordinate this project with the Tennessee Wildlife Resources Agency (Rob Todd, rob.todd@tn.gov, 615-781-6577) to ensure that legal requirements for protection of state listed rare animals are addressed. Additionally, we ask that you contact the U.S. Fish and Wildlife Service Field Office, Cookeville, Tennessee (931-525-4970) for comments regarding federally listed species.

Thank you for considering Tennessee's rare species throughout the planning of this project. Should you have any questions, please do not hesitate to contact Stephanie at (615) 532-4799 or stephanie.ann.williams@tn.gov.

Sincerely,

Stephanie Williams

Stephanie A. Williams
Natural Heritage Data Manager

From: McMillen, David - NRCS, Nashville, TN <david.mcmillen@tn.usda.gov>
Sent: Tuesday, February 12, 2019 12:06 PM
To: Ron Dow
Cc: McDaniel, Curt - NRCS, Jackson, TN; Blackwood, Gary - NRCS, Jackson, TN; Crosby, Meredith - NRCS, Lexington, TN
Subject: TN State Veterans' Homes Board - FAI#47-018 Arlington, TN

Ronald,

I am in receipt of the Ed Harries letter dated February 5, 2019 concerning the construction of a skilled nursing home in Arlington, Tennessee.

USDA-NRCS is involved in providing evaluations for the Farmland Protection Policy Act (FPPA) when federal dollars are involved in converting farmland. This simply serves as an inventory of these conversions and promote the evaluation of alternate sites.

However, this project is exempt from FPPA because it is located in a census urbanized area. This information is provided solely on the information provided. No field visit has been performed.

If you have any questions, please feel free to contact me via phone or email.

Dave

David McMillen, LPSS

*State Soil Scientist
801 Broadway, Suite 675
Nashville, TN 37203
(615) 277-2550 office
(615) 390-1507 SMS/cell*



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From: Rob Todd <Rob.Todd@tn.gov>
Sent: Wednesday, February 20, 2019 12:56 PM
To: Ron Dow
Subject: Tennessee State Veterans Home NEPA Environmental Review
Attachments: Ronald Dow - Tennessee State Veterans Home - Letter - 2-20-2019.pdf

Mr. Dow:

The Tennessee Wildlife Resources Agency has reviewed the information that you provided regarding the proposed Tennessee State Veterans Nursing Facility and our response is in the attached file. Thank you for the opportunity to review and comment on this proposed project. If I may be of further assistance, please contact me.

Robert Todd
Fish & Wildlife Environmentalist
Tennessee Wildlife Resources Agency
Ellington Agricultural Center
P.O. Box 40747
Nashville, TN 37204
Office: 615-781-6572
Cell: 931-881-8240
Fax: 615-781-6667
Email: rob.todd@tn.gov





TENNESSEE WILDLIFE RESOURCES AGENCY

ELLINGTON AGRICULTURAL CENTER
P. O. BOX 40747
NASHVILLE, TENNESSEE 37204

February 20, 2019

Ronald Dow
Ensafe
220 Athens Way, Suite 410
Nashville, TN 37228

Re: Tennessee State Veterans Home NEPA Environmental Review

Dear Mr. Dow:

The Tennessee Wildlife Resources Agency has reviewed the information that you provided regarding the construction of 126 bed nursing facility at 11293 Memphis Arlington Road in Arlington, Tennessee and provides the following comments. It is our understanding that the facility will be constructed on previously disturbed soil located on the property where the Arlington Development Center previously existed. The site for the facility is mostly grassed and shrub covered area but wooded areas are present on the western, southern and eastern portions of the property. If the project will require the clearing of trees and since we share authority with the U.S. Fish and Wildlife Service (USFWS) on the Indiana Myotis (*Myotis sodalist*) and the Northern Long-eared Bat (*Myotis septentrionalis*), we request that you consult with the USFWS Cookeville, Tennessee Field Office regarding potential impacts to these listed species; and will defer to the opinion of the U.S. Fish and Wildlife Service's Cookeville Field Office regarding potential impacts to the state and federally endangered bats due to the proposed project. Otherwise, we do not anticipate adverse impacts to state listed species under our authority due to the proposed construction.

Thank you for the opportunity to review and comment on this proposed project. If I may be of further assistance, please contact me.

Sincerely,

A handwritten signature in black ink that reads "Robert M. Todd".

Robert M. Todd
Assistant Chief of Environmental Services Division

The State of Tennessee

AN EQUAL OPPORTUNITY, EQUAL ACCESS, AFFIRMATIVE ACTION EMPLOYER



DEPARTMENT OF THE ARMY
MEMPHIS DISTRICT CORPS OF ENGINEERS
167 NORTH MAIN STREET B-202
MEMPHIS, TENNESSEE 38103-1894

April 8, 2019

Mr. Ronald Dow
EnSafe
220 Athens Way, Suite 410
Nashville, Tennessee 37228

Dear Mr. Dow:

This is in reference to your request to construct a new veteran's skilled nursing facility on property located in Arlington, Shelby County, Tennessee, as shown on the attached map. Based on the information that you provided, and other information available to us, we have determined that this project does not require permit authorization under Section 404 of the Clean Water Act provided no dredged or fill material is placed into waters of the United States. Please notify this office if project plans change so that such a discharge is required so that we can discuss potential permitting requirements with you.

The Memphis District Regulatory Branch is committed to providing quality and timely service to our customers. In an effort to improve customer service, we invite you to complete a Customer Service Survey found at http://corpsmapu.usace.army.mil/cm_apex/f?p=regulatory_survey. Your comments, positive or negative, will not affect any current or future dealings with the Corps of Engineers.

If you have questions, please contact Justin Newcomb at (901) 544-0731 and refer to File No. MVM-2019-059.

Sincerely,

A handwritten signature in black ink, appearing to read "RS Allan".

Roger S. Allan
Supervisor
Regulatory Branch

Enclosure



**FIGURE 1
VICINITY MAP
PROPOSED TENNESSEE VETERANS' HOME
ARLINGTON, TENNESSEE**

LEGEND
 SUBJECT PROPERTY BOUNDARY

NAD 1983 STATE PLANE
 TENNESSEE FEET
 0 500 1,000
 SCALE IN FEET

REQUESTED BY:	JG
DRAWN BY:	AZ
DATE:	1/24/2019
PROJECT:	088823477

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X:\GIS\VeteransHomeArlington\Fig1\Fig1.mxd

Sources: Esri, HERE, DeLorme, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), MapmyIndia, NGCC, © OpenStreetMap contributors, and the GIS User Community



ELM PARK STREET

LEGEND

 SUBJECT PROPERTY BOUNDARY

NAD 1983 STATE PLANE
TENNESSEE FEET
0 120 240
SCALE IN FEET

FIGURE 2
SITE AERIAL PHOTOGRAPH
PROPOSED TENNESSEE VETERANS' HOME
ARLINGTON, TENNESSEE

REQUESTED BY:	JG
DRAWN BY:	AZ
DATE:	1/24/2019
PROJECT:	0888823477

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K:\DGCS\VeteransHomeArlington\Fig\SiteAerialMap.mxd

From: Dustin Boles <dustin_boles@fws.gov>
Sent: Wednesday, February 13, 2019 4:07 PM
To: Ron Dow
Cc: Robbie Sykes
Subject: 2019-CPA-0215 TN Veterans Home Board Nursing Facility Construction; Arlington, Shelby Co

Mr. Dow,

U.S. Fish and Wildlife Service (Service) personnel have reviewed correspondence dated February 5, 2019, from the Tennessee State Veterans' Homes Board regarding the proposed construction of a nursing facility in Arlington, Shelby County, Tennessee. The Service is unaware of any federally protected species or designated critical habitat that would be impacted by the proposed action. Our database is a compilation of collection records made available by various individuals and resource agencies. This information is seldom based on comprehensive surveys of all potential habitat and thus does not necessarily provide conclusive evidence that protected species are present or absent at a specific locality.

Thank you for the opportunity to comment on the proposed action. Provided all regulatory requirements are fulfilled, we would have no objections or concerns with this project.

Sincerely,

Dustin W. Boles
Fish and Wildlife Biologist
U.S. Fish and Wildlife Service
446 Neal Street
Cookeville, Tennessee 38501
Office: 931/525-4984
Cell: 931/261-0117

Email: dustin_boles@fws.gov

NOTE: This email correspondence and any attachments to and from this sender are subject to the Freedom of Information Act (FOIA) and may be disclosed to third parties



Appendix C
Potential Site Survey

Potential Site Study

For

Tennessee State Veterans Home - Shelby County, Tennessee

Tennessee Department of Veterans Affairs

Real Estate Strategy Group

State of Tennessee Real Estate Asset Management

Department of General Services

October 13, 2014

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Exhibits

- A. Site Map**
- B. Veteran Population Density Map**
- C. MTA Bus Route Map**

Executive Summary

1. Purpose

The study was conducted for the purpose of locating potential sites in Shelby County, Tennessee for a new 144 bed Tennessee State Veterans Home.

2. Resources

CoStar, a commercial real estate listing website, was used to identify all properties using the parameters below:

- 20 - 50 available acres
- No maximum listing price

3. Site Evaluation Factors

The following factors are used to determine if a site is an acceptable location for a Tennessee State Veterans' Home or Veterans' Community Living Center. They are not listed in order of priority and are not all inclusive but are provided to serve as a guideline during search for an acceptable site.

1. Sites must be appropriate for residential use, in proximity to viable downtown or commercial centers. Parcels must be near existing residential uses, preferably single family, which reinforce the feeling of "neighborhood. The residential uses should be in good condition or the subject of a realistic plan to improve them to a good condition. Areas impacted by high concentrations of very low income housing, which is deteriorating, or in jeopardy of deterioration will not satisfy this criterion. Acceptance is contingent upon funded community initiatives to revitalize areas adjacent to the site. A site will more likely be accepted where the proposed development will build on or complement existing anchor institutions. It must also support the economic vitality of traditional center of commerce similar to those found in a neighborhood of primarily unassisted housing.
2. Sites should exhibit no obvious negative environmental influences, which cannot be corrected or acceptably mitigated. Environmental impacts include, but are not limited to: excessive noise or physical hazard from railroad, vehicular, or air traffic; high tension power lines or high pressure natural gas transmission lines; sanitary landfills or salvage yards; sewage treatment plants; stored hazardous materials on or near the sites; buried or spilled hazardous wastes; operating oil wells; mine shafts; gravel pits; wetland designation; and prime agricultural soils classification. TSVH will not consider projects to be located in a 100-year flood plain unless all necessary governmental approvals are obtained and all buildings, parking areas, and pedestrian and vehicular ingress and egress will be elevated at least one foot above the flood plain elevation when the project is finished.
3. Other environmental factors to consider include wetlands, wild and scenic rivers, prime agricultural soils, historic districts, and lead based paint. Potential delays in processing, additional design requirements, and significant development costs may occur if the following environmental issues are encountered:

- Sites in 100-year flood plains or sites involving wetlands in the area proposed for construction.
 - Sites within one mile of jet capable airports (two miles or further if located within the main landing or take-off paths for aircraft).
 - Sites with significant historic value.
 - Sites with any significant amount of soil contamination or with a history of previous use such as a gas station, paint manufacturer or sales, dry cleaning, auto repair or salvage, heavy manufacturing, etc, which present a high risk of residual soil contamination.
 - Sites within 600 feet of railroads or within 400 feet of major underground gas transmission lines or underground storage.
 - Sites in heavy traffic or high crime areas.
 - Sites within 500 feet of a wild and scenic river.
4. Proposals involving federal funds for occupied sites should involve no permanent relocation. Funding for relocation costs is not available from the Department of Veterans Affairs or the State of Tennessee.
 5. Parcels must have all necessary utilities. The sites must be served by a municipally-owned water supply, as well as a storm and sanitary sewer system, available and adequate for the number of units proposed. Private water systems will not be approved except for lawn irrigation.
 6. Sites must be of a reasonable size and configuration to permit acceptable and professional site planning with adequate open space, circulation, and parking, exclusive of parking in primary drives. Long and narrow, so-called "bowling alley" sites requiring a single point of access and an extensive cul-de-sac are not acceptable. Sufficient space must be available to accommodate fire safety equipment, solid waste removal trucks and delivery vehicles. The proposed project should not be out of scale relative to current and proposed adjacent land uses.
 7. Sites are required to have sufficient frontage on a paved thorough fare to 1) be able to have a self-advertising quality, 2) allow for adequate ingress and egress where ingress or egress is necessary from that paved road, 3) allow for adequate visual separation from other adjacent uses, and 4) allow for adequate signage, lighting, and landscaping so as to establish a pleasing and noticeable residential presence. With regard to the foregoing criteria, it should be noted that the traffic speeds permitted on the streets and the density and nature of surrounding uses may have a bearing on the amount of frontage that is required in a given situation.
 8. The surrounding uses when viewed from the site itself should usually be well maintained and aesthetically pleasing. Sites will be rejected for proximity to dumps, auto salvage yards, and heavy industrial uses. Sites may also be rejected for deteriorating or blighted residential uses, massive parking lots or storage yards, unsightly loading zones at retail facilities, and similar uses unless screening can be put in place which adequately protects the proposed development site from the negative aspects of the adjacent use.
 9. Sites should have easy and safe ingress and egress. Areas of concern include difficult left-hand turns against prevailing traffic, excessive curb cuts surrounding the entrance to the development, and

unreasonable lines of sight at the entrance. Excessive traffic congestion should be avoided. Examples include major employment parking lots, regional shopping malls, and multi-screen theaters.

10. Good vehicular access and walkable connections are to be available for residents to public transportation and community resources such as grocery shopping, pharmacy, banking, employment opportunities, religious and educational institutions, medical and social services, recreational facilities and community parks. There should be appropriate separation of vehicles from pedestrian traffic. Sites should allow for visually proud orientation of the Living Center to the street and surrounding neighborhood. Surrounding uses, when viewed from the Living Center should be well maintained and aesthetically pleasing. Other desirable site characteristics include some degree of physical attractiveness such as mature vegetation, rolling topography, and water frontage.
11. In cases where more than one site is submitted in a single market area or where a site does not meet all of the foregoing criteria, other relevant considerations may be taken into account. Other relevant considerations include but are not limited to a) availability of and/or close proximity to neighborhood and community services, schools, parks, libraries, and other special amenities geared to the population to be served by the proposal, b) other "desirable" site characteristics described in 10 above.

A community may not have sites available that meet all of the criteria. In such situations, the best available site may be selected. The site evaluators must describe and compare all available sites and demonstrate that the proposed site is the best available.

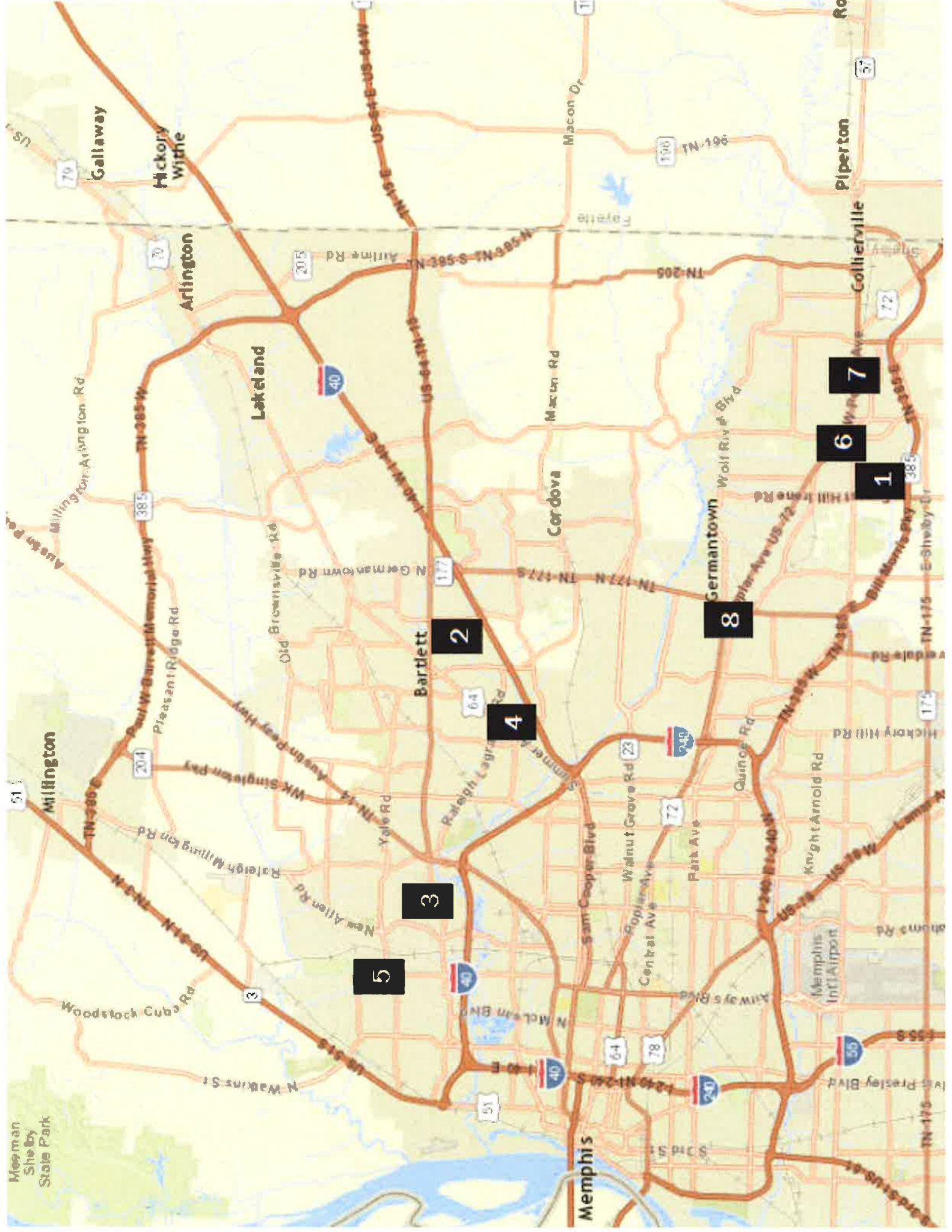
4. Results

Approximately 30 sites were reviewed using the above parameters. Based on the site selection criteria, as set forth by the agency, the potential site sampling was reduced to eight (8) properties, with one (1) site pending. The sites ranged in price from \$5.6 million, at the highest, to \$250,000 at the lowest. Below is a list of the sites by ranking.

No.	Address	City	Property Info.	Sale Info.
(1)	Creswyn Hills Dr.	Memphis	20 AC Land Parcel	\$2,000,000
(2)	Appling Rd & Reese Rd.	Memphis	24 AC Land Parcel	\$1,000,000
(3)	James Rd. at N. Highland	Memphis	20 AC Land Parcel	\$690,592
(4)	5891 Highway 70	Memphis	26 AC Land Parcel	\$600,000
(5)	2705 Southmeade Ave.	Memphis	28.29 AC Land Parcel	\$254,610
(6)	Winchester Rd.	Germantown	48 AC Land Parcel	\$4,500,000
(7)	W. Schilling Blvd.	Collierville	35 AC Land Parcel	\$5,600,000
(8)	0 Arthurwood Cv.	Germantown	30 AC Land Parcel	Pending

* See location map on the succeeding page.

** Site selection criteria for the top 4 sites are provided behind each site overview.



1

2

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5. Next Steps

We recommend an in-depth study be conducted to examine the feasibility of developing a new State Veterans' Home in the Shelby County area in addition to the preliminary potential site study we have conducted.

Potential Sites

(Sites are listed in the order in which they are ranked.)

Site 1 - Creswyn Hills Drive



20 Acres

Cost - \$2,000,000

The site is located in Germantown, southwest of Memphis proper in the 385 corridor submarket in Shelby County. It is in a new development called Forest Hill Heights, which consists of multi-family units and corporate offices. The property has a lake in the center of the site, but can be filled as it is not in a flood plain. Public transportation is 0.5 miles east on Winchester Drive.



TENNESSEE STATE VETERANS' HOMES
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Site Selection Criteria Checklist

Project Name: Potential Veterans Home

Site Designation or Address: Creswyn Hills Drive

Neighborhood

Proximity to viable downtown or commercial centers	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Near existing residential uses, preferable single family	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Neighborhood homes in good condition?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Plan to bring neighborhood homes into good condition?	<input type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> N/A
Crime Rate	<input type="radio"/> < average	<input type="radio"/> > average	<input checked="" type="radio"/> average
Proximity to Cultural activities	<input checked="" type="radio"/> <2 mi	<input type="radio"/> >2 mi	
Proximity to Religious Facilities	<input checked="" type="radio"/> <2 mi	<input type="radio"/> >2 mi	
Proximity to Shopping/Consumer Services	<input checked="" type="radio"/> <1 mi	<input type="radio"/> >1 mi	
Proximity to Public Parks/Recreation	<input checked="" type="radio"/> <1 mi	<input type="radio"/> >1 mi	
Surrounding environment aesthetically compatible	<input checked="" type="radio"/> Yes	<input type="radio"/> No	

Environmental Impacts

Noise or physical hazards from railroads	<input checked="" type="radio"/> No	<input type="radio"/> Yes	
Noise or physical hazards from vehicular traffic	<input checked="" type="radio"/> No	<input type="radio"/> Yes	
Noise or physical hazards from Air Traffic	<input checked="" type="radio"/> No	<input type="radio"/> Yes	
Noise or physical hazards form industrial operations	<input checked="" type="radio"/> No	<input type="radio"/> Yes	
Proximity to high tension power lines	<input checked="" type="radio"/> > 500 ft	<input type="radio"/> <500 ft	
Proximity to high pressure natural gas transmission lines	<input checked="" type="radio"/> >500 ft	<input type="radio"/> <500 ft	
Proximity to sanitary landfill or salvage yard	<input checked="" type="radio"/> >2 mi	<input type="radio"/> <2 mi	
Proximity to sewage treatment plant	<input checked="" type="radio"/> >2 mi	<input type="radio"/> <2 mi	
Proximity to stored hazardous materials	<input checked="" type="radio"/> >2 mi	<input type="radio"/> <2 mi	
Proximity to operating oil wells	<input checked="" type="radio"/> >5 mi	<input type="radio"/> <5 mi	
Proximity to Jet Capable airport	<input checked="" type="radio"/> >1 mi	<input type="radio"/> <1 mi	
Proximity to Jet Capable airport if in take off or landing path	<input checked="" type="radio"/> >2 mi	<input type="radio"/> <2 mi	<input type="radio"/> N/A
mine shafts	<input checked="" type="radio"/> >1000 ft	<input type="radio"/> <1000ft	
gravel pits/quaries	<input checked="" type="radio"/> >1 mi	<input type="radio"/> < 1 mi	
sink holes	<input checked="" type="radio"/> >500 ft	<input type="radio"/> on site	
asbestos containing materials	<input checked="" type="radio"/> none	<input type="radio"/> on site	
underground storage tanks	<input checked="" type="radio"/> none	<input type="radio"/> on site	
wetland designation	<input checked="" type="radio"/> none	<input type="radio"/> on site	
brownfields	<input checked="" type="radio"/> none	<input type="radio"/> on site	
poor adjacent or regional storm water drainage	<input checked="" type="radio"/> no	<input type="radio"/> Yes	
prime agricultural soils classification.	<input checked="" type="radio"/> no	<input type="radio"/> Yes	
Proximity to wild and scenic river	<input checked="" type="radio"/> > 500 ft	<input type="radio"/> < 500 ft	
Proximity to historic district	<input checked="" type="radio"/> >500 ft	<input type="radio"/> < 500 ft	
property contains lead based paint	<input checked="" type="radio"/> no	<input type="radio"/> yes	
property located in 100 yr flood plain	<input checked="" type="radio"/> no	<input type="radio"/> yes	
fill required to elevate above flood plain	<input checked="" type="radio"/> no	<input type="radio"/> yes	

Utilities

Approved water supply	<input checked="" type="radio"/> yes	<input type="radio"/> no
Approved sanitary sewer	<input checked="" type="radio"/> yes	<input type="radio"/> no
Approved storm water system	<input checked="" type="radio"/> yes	<input type="radio"/> no
Electrical	<input checked="" type="radio"/> yes	<input type="radio"/> no
natural gas	<input checked="" type="radio"/> yes	<input type="radio"/> no
telephone	<input checked="" type="radio"/> yes	<input type="radio"/> no
fiber optic	<input type="radio"/> yes	<input type="radio"/> no
cable tv	<input checked="" type="radio"/> yes	<input type="radio"/> no

Site Size/Shape

Flag Lot	<input type="radio"/> no	<input type="radio"/> yes
Alternate entrance	<input checked="" type="radio"/> yes	<input type="radio"/> no
Site is adequate size and shape for structure, drives, parking, etc.	<input checked="" type="radio"/> yes	<input type="radio"/> no
Site allows for a visually proud orientaton of CLC to street and neighborhood	<input checked="" type="radio"/> yes	<input type="radio"/> no

Entrance features

adequate to provide a self advertising quality	<input checked="" type="radio"/> yes	<input type="radio"/> no
allows for adequate ingress and egress	<input checked="" type="radio"/> yes	<input type="radio"/> no
allows of adequate visual separation from other adjacent uses	<input checked="" type="radio"/> yes	<input type="radio"/> no
allows for adequate signage, lighting and landscaping	<input checked="" type="radio"/> yes	<input type="radio"/> no
difficult left hand turn upon exit	<input type="radio"/> no	<input type="radio"/> yes
adequate clear line of site	<input checked="" type="radio"/> yes	<input type="radio"/> no
frequent traffic congestion	<input type="radio"/> no	<input type="radio"/> yes

Transportation/pedestrian walkways

Walkable connections to transportation access	<input checked="" type="radio"/> yes	<input type="radio"/> no
Appropriate separation of vehicles from pedestrian traffic	<input checked="" type="radio"/> yes	<input type="radio"/> no
Proximity to Public Transportation Stop	<input type="radio"/> <.5 mi	<input checked="" type="radio"/> >.5mi

Zoning

zoned appropriate for intended use	<input checked="" type="radio"/> yes	<input type="radio"/> no
Re-zoning strongly possible	<input checked="" type="radio"/> yes	<input type="radio"/> no

Emergency Services

Proximity to Police Station	<input type="radio"/> <1 mi	<input checked="" type="radio"/> >1 mi
Proximity to Fire Station	<input type="radio"/> <1 mi	<input checked="" type="radio"/> >1 mi
Proximity to Ambulance/Paramedic Service	<input type="radio"/> <1 mi	<input checked="" type="radio"/> >1 mi
Hospital Proximity	<input checked="" type="radio"/> <5 mi	<input type="radio"/> >5 mi
Proximity to competing facilities	<input type="radio"/> >5 mi	<input checked="" type="radio"/> <5 mi

Notes:

Completed By: Jeff Jones

Date: 10/13/14

Site 2 - Appling and Reese Road



24 Acres

Cost - \$1,000,000

The site is located in northeast Memphis, approximately 12 miles from the downtown business district, and approximately 0.5 miles away from I-40. The 24 acre site is a portion of a 48 acre tract planned for retail and multi-family use. The property is located in a new and upscale area on a mostly cleared, flat site. A portion of the tract is located within the FEMA 100-year flood zone; however, engineering of the land could remedy this issue. Public transportation is 0.5 miles north of the site at Stage Road.



TENNESSEE STATE VETERANS' HOMES
"Proudly Serving Those Who Served"

Site Selection Criteria Checklist

Project Name: Potential Veterans Home

Site Designation or Address: Appling and Reese Rd

Neighborhood

Proximity to viable downtown or commercial centers	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Near existing residential uses, preferable single family	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Neighborhood homes in good condition?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Plan to bring neighborhood homes into good condition?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Crime Rate	<input checked="" type="radio"/> < average	<input type="radio"/> > average	<input checked="" type="radio"/> average
Proximity to Cultural activities	<input checked="" type="radio"/> <2 mi	<input type="radio"/> >2 mi	
Proximity to Religious Facilities	<input checked="" type="radio"/> <2 mi	<input type="radio"/> >2 mi	
Proximity to Shopping/ Consumer Services	<input checked="" type="radio"/> <1 mi	<input type="radio"/> >1 mi	
Proximity to Public Parks/Recreation	<input checked="" type="radio"/> <1 mi	<input type="radio"/> >1 mi	
Surrounding environment aesthetically compatible	<input checked="" type="radio"/> Yes	<input type="radio"/> No	

Environmental Impacts

Noise or physical hazards from railroads	<input checked="" type="radio"/> No	<input type="radio"/> Yes	
Noise or physical hazards from vehicular traffic	<input checked="" type="radio"/> No	<input type="radio"/> Yes	
Noise or physical hazards from Air Traffic	<input checked="" type="radio"/> No	<input type="radio"/> Yes	
Noise or physical hazards form industrial operations	<input checked="" type="radio"/> No	<input type="radio"/> Yes	
Proximity to high tension power lines	<input checked="" type="radio"/> > 500 ft	<input type="radio"/> <500 ft	
Proximity to high pressure natural gas transmission lines	<input checked="" type="radio"/> >500 ft	<input type="radio"/> <500 ft	
Proximity to sanitary landfill or salvage yard	<input checked="" type="radio"/> >2 mi	<input type="radio"/> <2 mi	
Proximity to sewage treatment plant	<input checked="" type="radio"/> >2 mi	<input type="radio"/> <2 mi	
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Proximity to operating oil wells	<input checked="" type="radio"/> >5 mi	<input type="radio"/> <5 mi	
Proximity to Jet Capable airport	<input checked="" type="radio"/> >1 mi	<input type="radio"/> <1 mi	
Proximity to Jet Capable airport if in take off or landing path	<input checked="" type="radio"/> >2 mi	<input type="radio"/> <2 mi	<input type="radio"/> N/A
mine shafts	<input checked="" type="radio"/> >1000 ft	<input type="radio"/> <1000ft	
gravel pits/quaries	<input checked="" type="radio"/> >1 mi	<input type="radio"/> < 1 mi	
sink holes	<input checked="" type="radio"/> >500 ft	<input type="radio"/> on site	
asbestos containing materials	<input checked="" type="radio"/> none	<input type="radio"/> on site	
underground storage tanks	<input checked="" type="radio"/> none	<input type="radio"/> on site	
wetland designation	<input checked="" type="radio"/> none	<input type="radio"/> on site	
brownfields	<input checked="" type="radio"/> none	<input type="radio"/> on site	
poor adjacent or regional storm water drainage	<input checked="" type="radio"/> no	<input type="radio"/> Yes	
prime agricultural soils classification.	<input checked="" type="radio"/> no	<input type="radio"/> Yes	
Proximity to wild and scenic river	<input checked="" type="radio"/> > 500 ft	<input type="radio"/> < 500 ft	
Proximity to historic district	<input checked="" type="radio"/> >500 ft	<input type="radio"/> < 500 ft	
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property located in 100 yr flood plain	<input checked="" type="radio"/> no	<input type="radio"/> yes	
fill required to elevate above flood plain	<input checked="" type="radio"/> no	<input type="radio"/> yes	

Utilities

Approved water supply	<input checked="" type="radio"/> yes	<input type="radio"/> no
Approved sanitary sewer	<input checked="" type="radio"/> yes	<input type="radio"/> no
Approved storm water system	<input checked="" type="radio"/> yes	<input type="radio"/> no
Electrical	<input checked="" type="radio"/> yes	<input type="radio"/> no
natural gas	<input checked="" type="radio"/> yes	<input type="radio"/> no
telephone	<input checked="" type="radio"/> yes	<input type="radio"/> no
fiber optic	<input type="radio"/> yes	<input type="radio"/> no
cable tv	<input checked="" type="radio"/> yes	<input type="radio"/> no

Site Size/Shape

Flag Lot	<input type="radio"/> no	<input type="radio"/> yes
Alternate entrance	<input checked="" type="radio"/> yes	<input type="radio"/> no
Site is adequate size and shape for structure, drives, parking, etc.	<input checked="" type="radio"/> yes	<input type="radio"/> no
Site allows for a visually proud orientaton of CLC to street and neighborhood	<input checked="" type="radio"/> yes	<input type="radio"/> no

Entrance features

adequate to provide a self advertising quality	<input checked="" type="radio"/> yes	<input type="radio"/> no
allows for adequate ingress and egress	<input checked="" type="radio"/> yes	<input type="radio"/> no
allows of adequate visual separation from other adjacent uses	<input checked="" type="radio"/> yes	<input type="radio"/> no
allows for adequate signage, lighting and landscaping	<input checked="" type="radio"/> yes	<input type="radio"/> no
difficult left hand turn upon exit	<input type="radio"/> no	<input type="radio"/> yes
adequate clear line of site	<input checked="" type="radio"/> yes	<input type="radio"/> no
frequent traffic congestion	<input type="radio"/> no	<input type="radio"/> yes

Transportation/pedestrian walkways

Walkable connections to transportation access	<input checked="" type="radio"/> yes	<input type="radio"/> no
Appropriate separation of vehicles from pedestrian traffic	<input checked="" type="radio"/> yes	<input type="radio"/> no
Proximity to Public Transportation Stop	<input type="radio"/> <.5 mi	<input type="radio"/> >.5mi

Zoning

zoned appropriate for intended use	<input checked="" type="radio"/> yes	<input type="radio"/> no
Re-zoning strongly possible	<input checked="" type="radio"/> yes	<input type="radio"/> no

Emergency Services

Proximity to Police Station	<input type="radio"/> <1 mi	<input checked="" type="radio"/> >1 mi
Proximity to Fire Station	<input type="radio"/> <1 mi	<input checked="" type="radio"/> >1 mi
Proximity to Ambulance/Paramedic Service	<input type="radio"/> <1 mi	<input checked="" type="radio"/> >1 mi
Hospital Proximity	<input checked="" type="radio"/> <5 mi	<input type="radio"/> >5 mi
Proximity to competing facilities	<input type="radio"/> >5 mi	<input checked="" type="radio"/> <5 mi

Notes:

Completed By: Jeff JonesDate: 8/26/14

Site 3 - James Road at North Highland Road



20 Acres

Cost - \$690,592

The site is located in Memphis in the North/North submarket in Shelby County. The land at the site is generally level and partially wooded. The property is roughly 0.6 miles north of I-40 and public transportation is one block north.



TENNESSEE STATE VETERANS' HOMES
"Proudly Serving Those Who Served"

Site Selection Criteria Checklist

Project Name: Potential Veterans Home

Site Designation or Address: James Rd at N. Highland Rd

Neighborhood

Proximity to viable downtown or commercial centers	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Near existing residential uses, preferable single family	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Neighborhood homes in good condition?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Plan to bring neighborhood homes into good condition?	<input type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> N/A
Crime Rate	<input type="radio"/> < average	<input type="radio"/> > average	<input checked="" type="radio"/> average
Proximity to Cultural activities	<input checked="" type="radio"/> <2 mi	<input type="radio"/> >2 mi	
Proximity to Religious Facilities	<input checked="" type="radio"/> <2 mi	<input type="radio"/> >2 mi	
Proximity to Shopping/Consumer Services	<input checked="" type="radio"/> <1 mi	<input type="radio"/> >1 mi	
Proximity to Public Parks/Recreation	<input checked="" type="radio"/> <1 mi	<input type="radio"/> >1 mi	
Surrounding environment aesthetically compatible	<input checked="" type="radio"/> Yes	<input type="radio"/> No	

Environmental Impacts

Noise or physical hazards from railroads	<input type="radio"/> No	<input type="radio"/> Yes	
Noise or physical hazards from vehicular traffic	<input type="radio"/> No	<input type="radio"/> Yes	
Noise or physical hazards from Air Traffic	<input type="radio"/> No	<input type="radio"/> Yes	
Noise or physical hazards form industrial operations	<input type="radio"/> No	<input type="radio"/> Yes	
Proximity to high tension power lines	<input checked="" type="radio"/> > 500 ft	<input type="radio"/> <500 ft	
Proximity to high pressure natural gas transmission lines	<input checked="" type="radio"/> >500 ft	<input type="radio"/> <500 ft	
Proximity to sanitary landfill or salvage yard	<input checked="" type="radio"/> >2 mi	<input type="radio"/> <2 mi	
Proximity to sewage treatment plant	<input checked="" type="radio"/> >2 mi	<input type="radio"/> <2 mi	
Proximity to stored hazardous materials	<input checked="" type="radio"/> >2 mi	<input type="radio"/> <2 mi	
Proximity to operating oil wells	<input checked="" type="radio"/> >5 mi	<input type="radio"/> <5 mi	
Proximity to Jet Capable airport	<input checked="" type="radio"/> >1 mi	<input type="radio"/> <1 mi	
Proximity to Jet Capable airport if in take off or landing path	<input checked="" type="radio"/> >2 mi	<input type="radio"/> <2 mi	<input type="radio"/> N/A
mine shafts	<input checked="" type="radio"/> >1000 ft	<input type="radio"/> <1000ft	
gravel pits/quaries	<input checked="" type="radio"/> >1 mi	<input type="radio"/> < 1 mi	
sink holes	<input checked="" type="radio"/> >500 ft	<input type="radio"/> on site	
asbestos containing materials	<input checked="" type="radio"/> none	<input type="radio"/> on site	
underground storage tanks	<input checked="" type="radio"/> none	<input type="radio"/> on site	
wetland designation	<input checked="" type="radio"/> none	<input type="radio"/> on site	
brownfields	<input checked="" type="radio"/> none	<input type="radio"/> on site	
poor adjacent or regional storm water drainage	<input checked="" type="radio"/> no	<input type="radio"/> Yes	
prime agricultural soils classification.	<input checked="" type="radio"/> no	<input type="radio"/> Yes	
Proximity to wild and scenic river	<input checked="" type="radio"/> > 500 ft	<input type="radio"/> < 500 ft	
Proximity to historic district	<input checked="" type="radio"/> >500 ft	<input type="radio"/> < 500 ft	
property contains lead based paint	<input checked="" type="radio"/> no	<input type="radio"/> yes	
property located in 100 yr flood plain	<input checked="" type="radio"/> no	<input type="radio"/> yes	
fill required to elevate above flood plain	<input checked="" type="radio"/> no	<input type="radio"/> yes	

Utilities

Approved water supply	<input checked="" type="radio"/> yes	<input type="radio"/> no
Approved sanitary sewer	<input checked="" type="radio"/> yes	<input type="radio"/> no
Approved storm water system	<input checked="" type="radio"/> yes	<input type="radio"/> no
Electrical	<input checked="" type="radio"/> yes	<input type="radio"/> no
natural gas	<input checked="" type="radio"/> yes	<input type="radio"/> no
telephone	<input checked="" type="radio"/> yes	<input type="radio"/> no
fiber optic	<input checked="" type="radio"/> yes	<input type="radio"/> no
cable tv	<input checked="" type="radio"/> yes	<input type="radio"/> no

Site Size/Shape

Flag Lot	<input type="radio"/> no	<input type="radio"/> yes
Alternate entrance	<input checked="" type="radio"/> yes	<input type="radio"/> no
Site is adequate size and shape for structure, drives, parking, etc.	<input checked="" type="radio"/> yes	<input type="radio"/> no
Site allows for a visually proud orientaton of CLC to street and neighborhood	<input checked="" type="radio"/> yes	<input type="radio"/> no

Entrance features

adequate to provide a self advertising quality	<input checked="" type="radio"/> yes	<input type="radio"/> no
allows for adequate ingress and egress	<input checked="" type="radio"/> yes	<input type="radio"/> no
allows of adequate visual separation from other adjacent uses	<input checked="" type="radio"/> yes	<input type="radio"/> no
allows for adequate signage, lighting and landscaping	<input checked="" type="radio"/> yes	<input type="radio"/> no
difficult left hand turn upon exit	<input type="radio"/> no	<input type="radio"/> yes
adequate clear line of site	<input checked="" type="radio"/> yes	<input type="radio"/> no
frequent traffic congestion	<input type="radio"/> no	<input type="radio"/> yes

Transportation/pedestrian walkways

Walkable connections to transportation access	<input checked="" type="radio"/> yes	<input type="radio"/> no
Appropriate separation of vehicles from pedestrian traffic	<input checked="" type="radio"/> yes	<input type="radio"/> no
Proximity to Public Transportation Stop	<input checked="" type="radio"/> <.5 mi	<input type="radio"/> >.5mi

Zoning

zoned appropriate for intended use	<input checked="" type="radio"/> yes	<input type="radio"/> no
Re-zoning strongly possible	<input checked="" type="radio"/> yes	<input type="radio"/> no

Emergency Services

Proximity to Police Station	<input type="radio"/> <1 mi	<input checked="" type="radio"/> >1 mi
Proximity to Fire Station	<input type="radio"/> <1 mi	<input checked="" type="radio"/> >1 mi
Proximity to Ambulance/Paramedic Service	<input type="radio"/> <1 mi	<input checked="" type="radio"/> >1 mi
Hospital Proximity	<input checked="" type="radio"/> <5 mi	<input type="radio"/> >5 mi
Proximity to competing facilities	<input type="radio"/> >5 mi	<input checked="" type="radio"/> <5 mi

Notes:

Site is in north Memphis close to parks, shopping and one block from the bus route.

Completed By: Jeff Jones

Date: 8/11/2014

Site 4 - 5891 Highway 70



26 Acres

Cost - \$600,000

The site is in Memphis in the Northeast/Northeast submarket in Shelby County. A portion of the site is located on the FEMA 100-year flood plain, and will need a site study to determine building location and usability. The site is located one (1) mile north of I-40, and public transportation passes directly in front of the site.



TENNESSEE STATE VETERANS' HOMES
"Proudly Serving Those Who Served"

Site Selection Criteria Checklist

Project Name: Potential Veterans Home

Site Designation or Address: 5891 Highway 70

Neighborhood

Proximity to viable downtown or commercial centers	<input checked="" type="radio"/>	Yes	<input type="radio"/>	No	
Near existing residential uses, preferable single family	<input checked="" type="radio"/>	Yes	<input type="radio"/>	No	
Neighborhood homes in good condition?	<input checked="" type="radio"/>	Yes	<input type="radio"/>	No	
Plan to bring neighborhood homes into good condition?	<input checked="" type="radio"/>	Yes	<input type="radio"/>	No	
Crime Rate	<input type="radio"/>	< average	<input type="radio"/>	> average	<input checked="" type="radio"/> N/A <input type="radio"/> average
Proximity to Cultural activities	<input checked="" type="radio"/>	<2 mi	<input type="radio"/>	>2 mi	
Proximity to Religious Facilities	<input checked="" type="radio"/>	<2 mi	<input type="radio"/>	>2 mi	
Proximity to Shopping/Consumer Services	<input checked="" type="radio"/>	<1 mi	<input type="radio"/>	>1 mi	
Proximity to Public Parks/Recreation	<input checked="" type="radio"/>	<1 mi	<input type="radio"/>	>1 mi	
Surrounding environment aesthetically compatible	<input checked="" type="radio"/>	Yes	<input type="radio"/>	No	

Environmental Impacts

Noise or physical hazards from railroads	<input checked="" type="radio"/>	No	<input type="radio"/>	Yes	
Noise or physical hazards from vehicular traffic	<input checked="" type="radio"/>	No	<input type="radio"/>	Yes	
Noise or physical hazards from Air Traffic	<input checked="" type="radio"/>	No	<input type="radio"/>	Yes	
Noise or physical hazards form industrial operations	<input checked="" type="radio"/>	No	<input type="radio"/>	Yes	
Proximity to high tension power lines	<input checked="" type="radio"/>	> 500 ft	<input type="radio"/>	<500 ft	
Proximity to high pressure natural gas transmission lines	<input checked="" type="radio"/>	>500 ft	<input type="radio"/>	<500 ft	
Proximity to sanitary landfill or salvage yard	<input checked="" type="radio"/>	>2 mi	<input type="radio"/>	<2 mi	
Proximity to sewage treatment plant	<input checked="" type="radio"/>	>2 mi	<input type="radio"/>	<2 mi	
Proximity to stored hazardous materials	<input checked="" type="radio"/>	>2 mi	<input type="radio"/>	<2 mi	
Proximity to operating oil wells	<input checked="" type="radio"/>	>5 mi	<input type="radio"/>	<5 mi	
Proximity to Jet Capable airport	<input checked="" type="radio"/>	>1 mi	<input type="radio"/>	<1 mi	
Proximity to Jet Capable airport if in take off or landing path	<input checked="" type="radio"/>	>2 mi	<input type="radio"/>	<2 mi	<input type="radio"/> N/A
mine shafts	<input checked="" type="radio"/>	>1000 ft	<input type="radio"/>	<1000ft	
gravel pits/quaries	<input checked="" type="radio"/>	>1 mi	<input type="radio"/>	< 1 mi	
sink holes	<input checked="" type="radio"/>	>500 ft	<input type="radio"/>	on site	
asbestos containing materials	<input checked="" type="radio"/>	none	<input type="radio"/>	on site	
underground storage tanks	<input checked="" type="radio"/>	none	<input type="radio"/>	on site	
wetland designation	<input checked="" type="radio"/>	none	<input type="radio"/>	on site	
brownfields	<input checked="" type="radio"/>	none	<input type="radio"/>	on site	
poor adjacent or regional storm water drainage	<input checked="" type="radio"/>	no	<input type="radio"/>	Yes	
prime agricultural soils classification.	<input checked="" type="radio"/>	no	<input type="radio"/>	Yes	
Proximity to wild and scenic river	<input checked="" type="radio"/>	> 500 ft	<input type="radio"/>	< 500 ft	
Proximity to historic district	<input checked="" type="radio"/>	>500 ft	<input type="radio"/>	< 500 ft	
property contains lead based paint	<input checked="" type="radio"/>	no	<input type="radio"/>	yes	
property located in 100 yr flood plain	<input type="radio"/>	no	<input checked="" type="radio"/>	yes	
fill required to elevate above flood plain	<input type="radio"/>	no	<input checked="" type="radio"/>	yes	

Utilities

Approved water supply	<input checked="" type="radio"/> yes	<input type="radio"/> no
Approved sanitary sewer	<input checked="" type="radio"/> yes	<input type="radio"/> no
Approved storm water system	<input checked="" type="radio"/> yes	<input type="radio"/> no
Electrical	<input checked="" type="radio"/> yes	<input type="radio"/> no
natural gas	<input checked="" type="radio"/> yes	<input type="radio"/> no
telephone	<input checked="" type="radio"/> yes	<input type="radio"/> no
fiber optic	<input checked="" type="radio"/> yes	<input type="radio"/> no
cable tv	<input checked="" type="radio"/> yes	<input type="radio"/> no

Site Size/Shape

Flag Lot	<input checked="" type="radio"/> no	<input type="radio"/> yes
Alternate entrance	<input checked="" type="radio"/> yes	<input type="radio"/> no
Site is adequate size and shape for structure, drives, parking, etc.	<input checked="" type="radio"/> yes	<input type="radio"/> no
Site allows for a visually proud orientaton of CLC to street and neighborhood	<input checked="" type="radio"/> yes	<input type="radio"/> no

Entrance features

adequate to provide a self advertising quality	<input checked="" type="radio"/> yes	<input type="radio"/> no
allows for adequate ingress and egress	<input checked="" type="radio"/> yes	<input type="radio"/> no
allows of adequate visual separation from other adjacent uses	<input checked="" type="radio"/> yes	<input type="radio"/> no
allows for adequate signage, lighting and landscaping	<input checked="" type="radio"/> yes	<input type="radio"/> no
difficult left hand turn upon exit	<input checked="" type="radio"/> no	<input type="radio"/> yes
adequate clear line of site	<input checked="" type="radio"/> yes	<input type="radio"/> no
frequent traffic congestion	<input checked="" type="radio"/> no	<input type="radio"/> yes

Transportation/pedestrian walkways

Walkable connections to transportation access	<input checked="" type="radio"/> yes	<input type="radio"/> no
Appropriate separation of vehicles from pedestrian traffic	<input checked="" type="radio"/> yes	<input type="radio"/> no
Proximity to Public Transportation Stop	<input checked="" type="radio"/> <.5 mi	<input type="radio"/> >.5mi

Zoning

zoned appropriate for intended use	<input checked="" type="radio"/> yes	<input type="radio"/> no
Re-zoning strongly possible	<input checked="" type="radio"/> yes	<input type="radio"/> no

Emergency Services

Proximity to Police Station	<input type="radio"/> <1 mi	<input checked="" type="radio"/> >1 mi
Proximity to Fire Station	<input type="radio"/> <1 mi	<input checked="" type="radio"/> >1 mi
Proximity to Ambulance/Paramedic Service	<input type="radio"/> <1 mi	<input checked="" type="radio"/> >1 mi
Hospital Proximity	<input checked="" type="radio"/> <5 mi	<input type="radio"/> >5 mi
Proximity to competing facilities	<input type="radio"/> >5 mi	<input checked="" type="radio"/> <5 mi

Notes:

Completed By: Jeff JonesDate: 10/13/14

Site 5 - Southmeade Avenue



28.29 Acres

Cost - \$254,610

The site is located in Memphis in the North submarket in Shelby County on rolling, wooded land. The property is adjacent to retail areas, including a Kroger and area mall. The site is located approximately 2.1 miles north of I-40 and public transportation to three (3) routes is within one (1) block.

Site 6 - Winchester Road

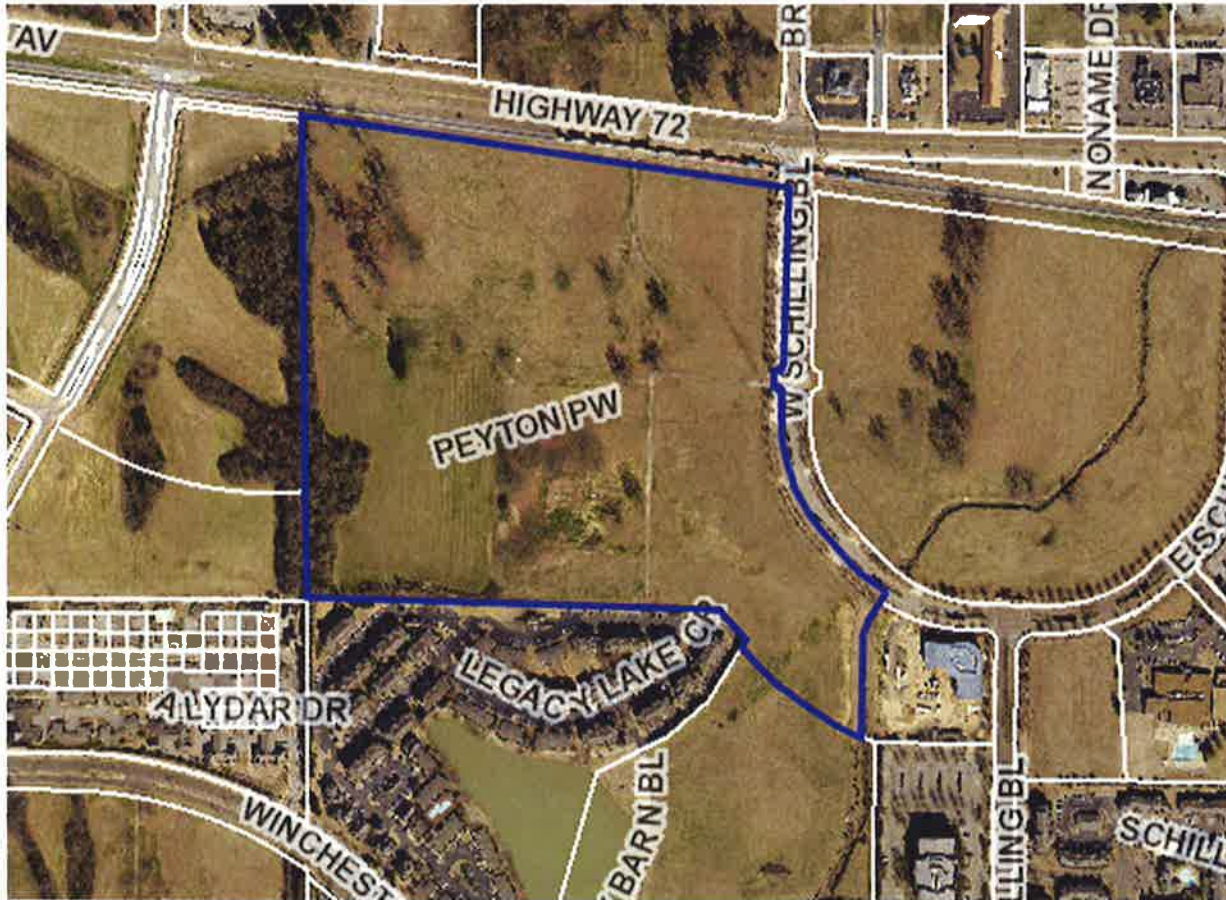


48 Acres

Cost - \$4,500,000

The site is located in Memphis in the 385 Corridor submarket in Shelby County. It is priced for Commercial PUD. The site is located approximately 2 miles from I-385 and public transportation is not available.

Site 7 - West Schilling Boulevard

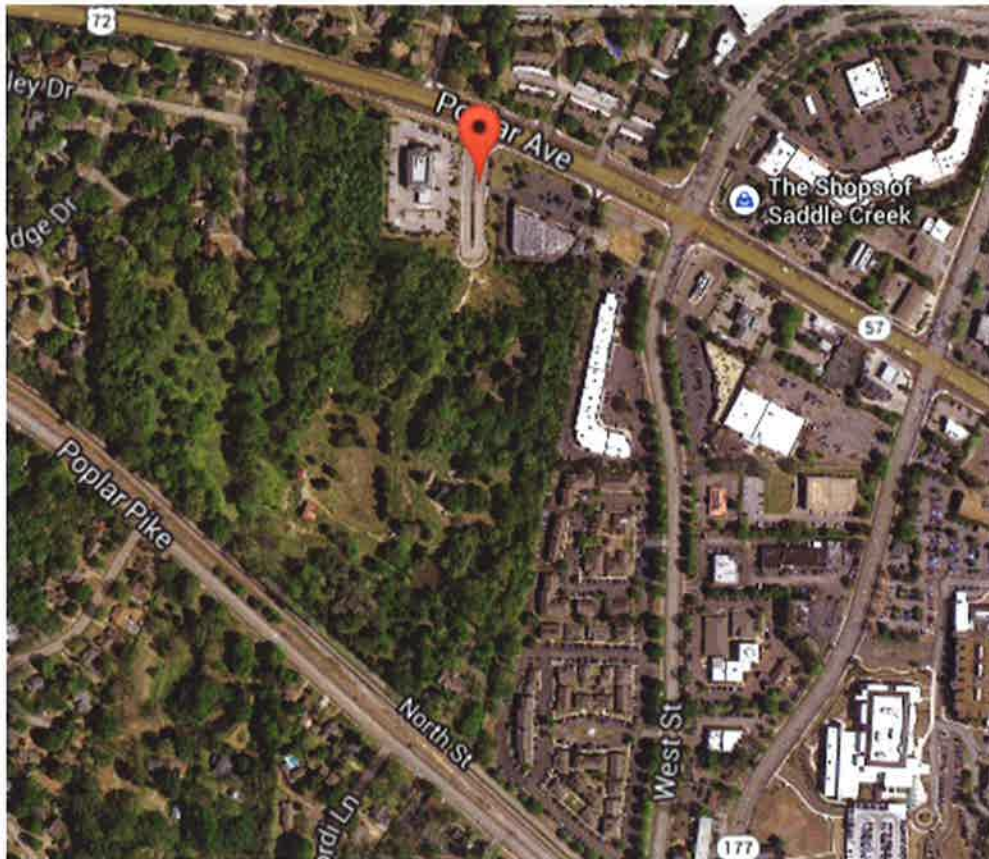


35 Acres

Cost - \$5,600,000

The site is located in Schilling Farms in Collierville in the 385 Corridor submarket in Shelby County. The land is generally level and priced for Commercial PUD. The property is approximately one (1) mile from I-385, and public transportation is not available.

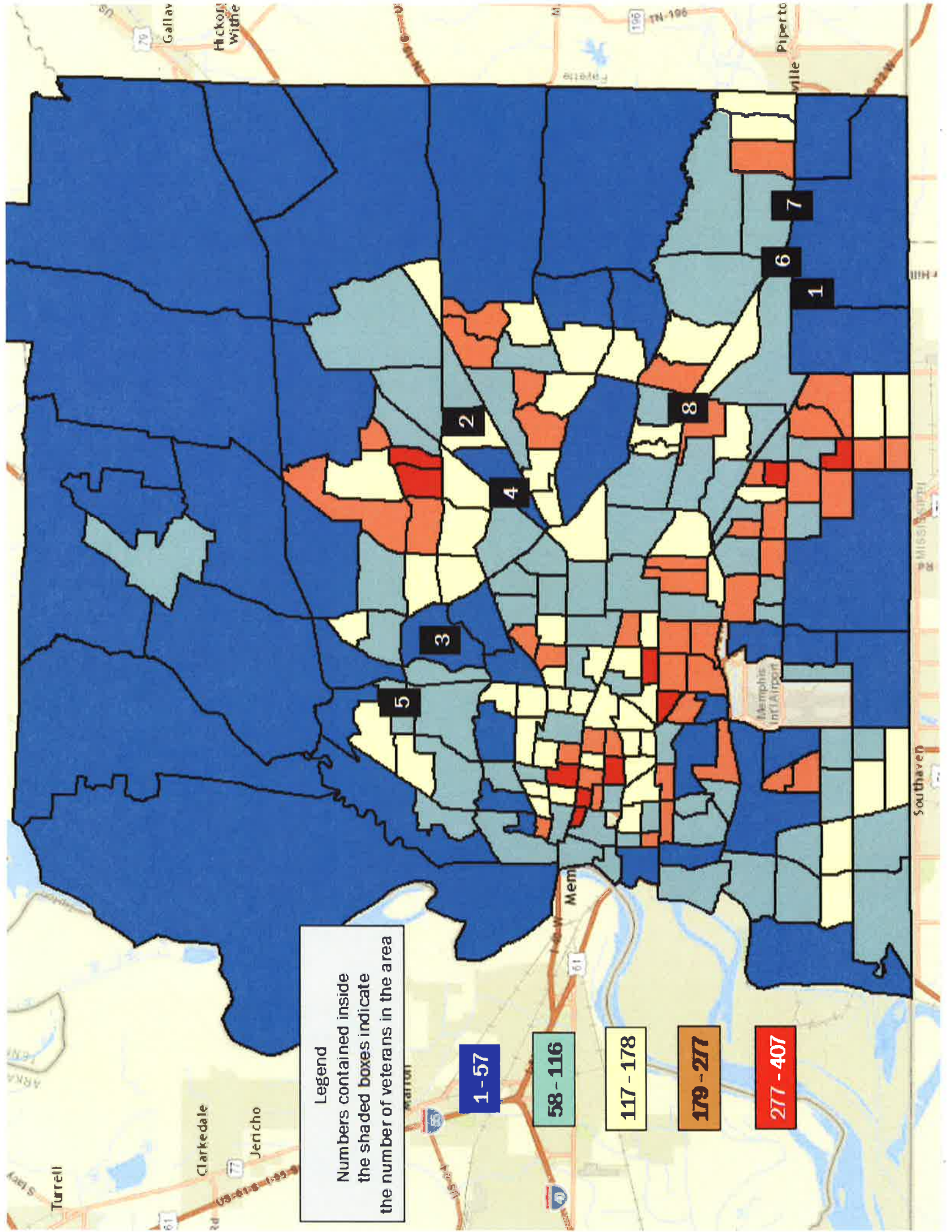
Site 8 - 0 Arthurwood Ct.



30 Acres

Cost - PENDING

The site at Arthurwood Cv. is currently in a pending sale status and no information was provided on the land associated with the site.



Legend
 Numbers contained inside the shaded boxes indicate the number of veterans in the area

1 - 57

58 - 116

117 - 178

179 - 277

277 - 407

2

4

3

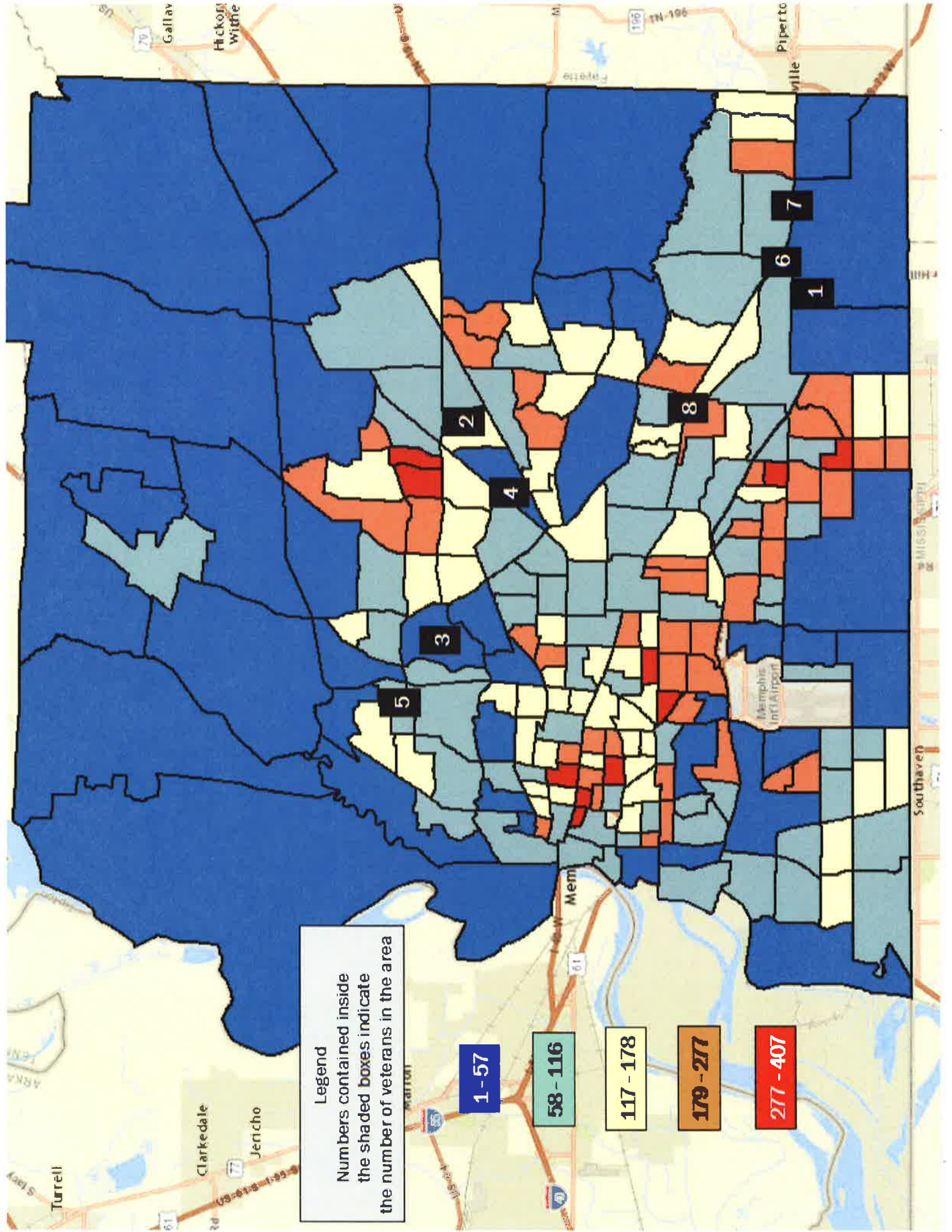
5

8

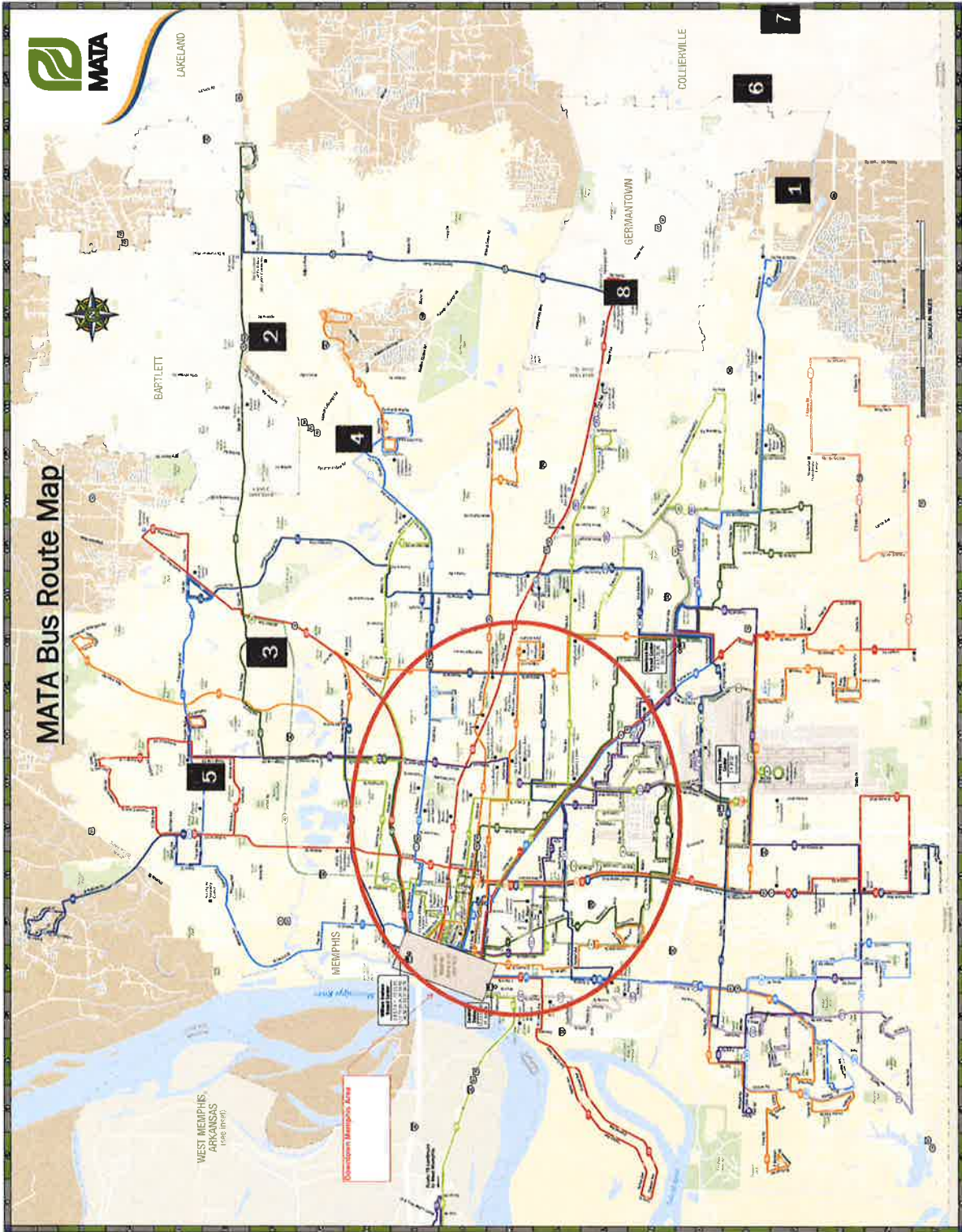
6

1

7



* Arlington Site not included on map because there are no MATA bus routes to the area





Appendix D
EJSCREEN Output Report

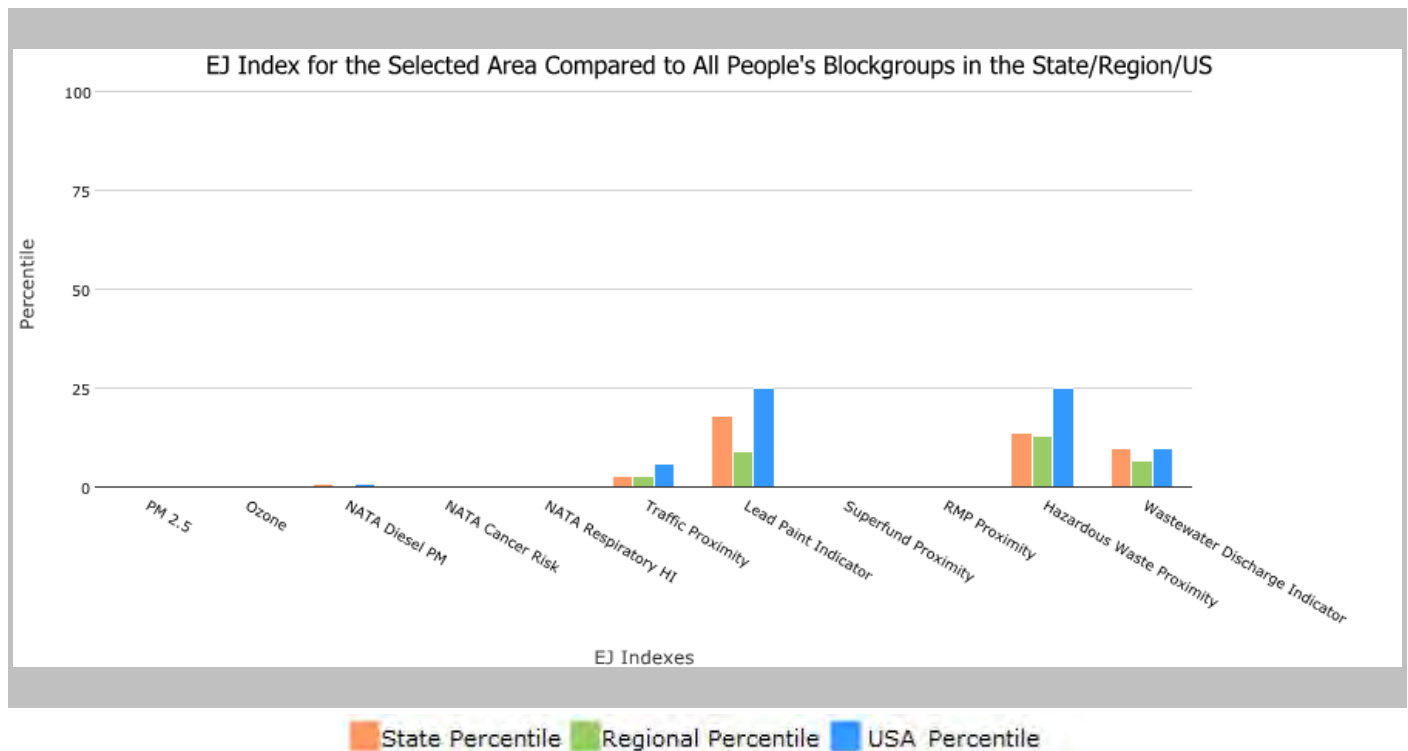
1.5 mile Ring Centered at 35.268373,-89.685786, TENNESSEE, EPA Region 4

Approximate Population: 5,007

Input Area (sq. miles): 7.06

TSVH Arlington

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EJ Index for PM2.5	0	0	0
EJ Index for Ozone	0	0	0
EJ Index for NATA* Diesel PM	1	0	1
EJ Index for NATA* Air Toxics Cancer Risk	0	0	0
EJ Index for NATA* Respiratory Hazard Index	0	0	0
EJ Index for Traffic Proximity and Volume	3	3	6
EJ Index for Lead Paint Indicator	18	9	25
EJ Index for Superfund Proximity	0	0	0
EJ Index for RMP Proximity	0	0	0
EJ Index for Hazardous Waste Proximity	14	13	25
EJ Index for Wastewater Discharge Indicator	10	7	10



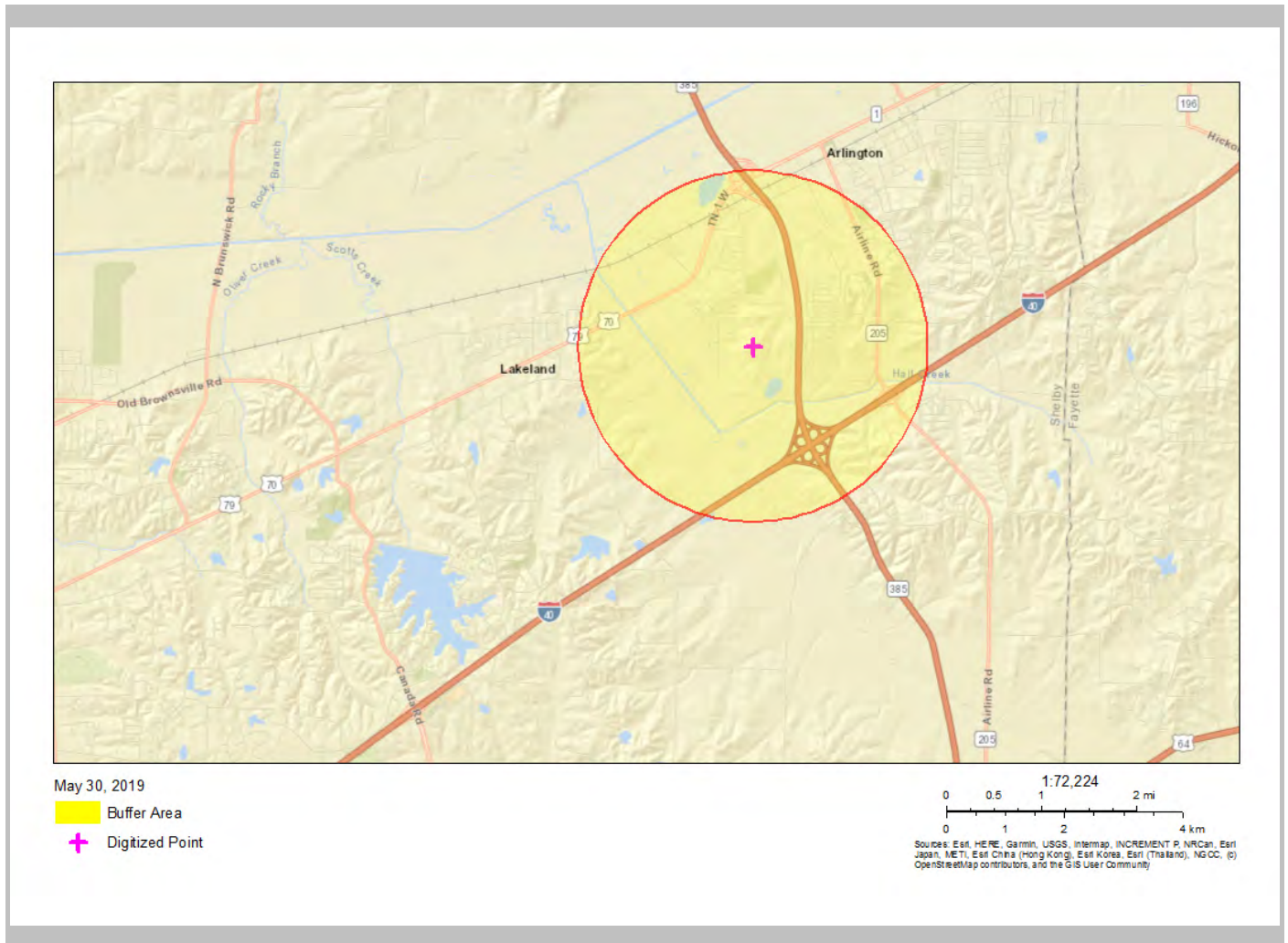
This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

1.5 mile Ring Centered at 35.268373,-89.685786, TENNESSEE, EPA Region 4

Approximate Population: 5,007

Input Area (sq. miles): 7.06

TSVH Arlington



Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	0

EJSCREEN Report (Version 2018)



1.5 mile Ring Centered at 35.268373,-89.685786, TENNESSEE, EPA Region 4

Approximate Population: 5,007

Input Area (sq. miles): 7.06

TSVH Arlington

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	9.74	10	23	9.48	44	9.53	51
Ozone (ppb)	42.4	42.3	45	39.4	69	42.5	48
NATA* Diesel PM ($\mu\text{g}/\text{m}^3$)	0.488	0.813	35	0.755	<50th	0.938	<50th
NATA* Cancer Risk (lifetime risk per million)	47	43	75	42	70-80th	40	70-80th
NATA* Respiratory Hazard Index	1.3	1.6	38	1.7	<50th	1.8	<50th
Traffic Proximity and Volume (daily traffic count/distance to road)	76	210	57	290	56	600	46
Lead Paint Indicator (% Pre-1960 Housing)	0.023	0.2	16	0.15	27	0.29	18
Superfund Proximity (site count/km distance)	0.54	0.063	97	0.079	97	0.12	95
RMP Proximity (facility count/km distance)	1.2	0.51	87	0.58	85	0.72	81
Hazardous Waste Proximity (facility count/km distance)	0.044	0.43	18	0.5	15	4.3	11
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0.0012	0.1	72	0.27	75	30	69
Demographic Indicators							
Demographic Index	14%	32%	16	38%	11	36%	17
Minority Population	19%	25%	58	38%	35	38%	38
Low Income Population	10%	38%	6	38%	6	34%	11
Linguistically Isolated Population	0%	1%	66	3%	50	4%	44
Population With Less Than High School Education	3%	14%	12	14%	13	13%	17
Population Under 5 years of age	7%	6%	68	6%	68	6%	66
Population over 64 years of age	6%	15%	11	16%	12	14%	15

* The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

For additional information, see: www.epa.gov/environmentaljustice

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.