U.S. Department of Veterans Affairs

Clarksville, Tennessee Veterans Affairs Outpatient Clinic
Draft Environmental Assessment

November 2025

Prepared for:
U.S. Department of Veterans Affairs
Office of Construction and Facilities Management

Prepared by:
LRS Federal LLC

Executive Summary

This environmental assessment (EA) has been prepared to analyze the potential environmental impacts associated with the United States (U.S.) Department of Veterans Affairs' (VA) Proposed Action to award a lease to a private entity that would construct a new outpatient clinic (OPC) for VA to lease and operate in Clarksville, Tennessee (TN). This Draft EA has been prepared in accordance with the National Environmental Policy Act of 1969 (NEPA; 42 United States Code (U.S.C.) 4321 et seq.).

Purpose and Need

The purpose of the Proposed Action is to provide outpatient healthcare services to area Veterans. The Proposed Action is needed to provide enhanced and expanded primary care and mental health services and add a comprehensive array of specialty care outpatient services to serve Veterans in Clarksville and the surrounding communities in a modern, state-of-the art facility. The Proposed Action would offer area Veterans timely, convenient access to health care and mental health services in a facility that provides specialty treatment programs and has the current and future capacity to serve an increasing patient population. The Proposed Action would address current and future projected health care capacity, service gaps, and operational inefficiencies.

Proposed Action

VA's Proposed Action is to award a lease to a private entity that would construct an approximately 290,000-square-foot OPC for VA to lease and operate for up to 20 years in Clarksville, TN. The proposed VA OPC would be available to Veterans and service members from all branches of the U.S. Armed Forces who meet the criteria for treatment. Operating hours may vary; however, the proposed VA OPC would generally be used Monday through Saturday between the hours of 7 a.m. to 7 p.m., except on federal holidays.

The OPC would be designed and built to VA design criteria and in accordance with local building and zoning codes and include other site improvements, amenities, and landscaped open space areas. The proposed OPC would comprise a maximum of four floors. Project components, in addition to the main OPC building, would include pedestrian pathways, entry and memorial plazas, gardens, an ambulance pick-up and drop-off area, as well as irrigated landscaping throughout the site. A proposed paved parking lot would allow for up to 1,500 parking spaces to accommodate employees and up to an approximate 3,000 patients and visitors per day.

Alternatives

The OPC would be constructed by a private entity for VA to lease and operate at one of three sites being considered: North Edgewood Place, Clarksville, TN; 501 Dunlop Lane, Clarksville, TN; and Rufus Johnson Boulevard and Highway 76, Clarksville, TN.

- **North Edgewood Place (Alternative A).** The Alternative A site consists of approximately 68 acres of undeveloped land, consisting of partially deciduous forest and cleared pastureland with Spring Creek intersecting the northern boundary of the site. The site further comprises four streams and an adjacent wetland area located in the eastern portion of the site. The site is located adjacent to Wilma Rudolph Boulevard (Highway 79) and is bordered to the east by multifamily residential buildings, a small private cemetery, and four separate hotels. A Walmart Superstore is located to the southeast and Tennessee Valley Authority (TVA) powerlines run adjacent to the south of the site. The remainder of the surrounding area is undeveloped with a mix of deciduous forest and open pastureland cover. The North Edgewood Place site is approximately 6.5 miles northeast of downtown Clarksville in Montgomery County, TN.

There are two plans being considered by VA for site development by a private entity for Alternative A.

Sub-Alternative A1. The site plan for Sub-Alternative A1 includes a four-story building consisting of approximately 290,000 square feet, four primary parking areas, three stormwater retention ponds, perimeter walking trails, a memorial wall, a flagpole circle, and a healing garden. The proposed OPC would be accessed via Fair Brook Place and from two driveways to the south via North Edgewood Place following the completion of the Spring Creek Parkway which will extend North Edgewood Place.

Sub-Alternative A2. The site plan for Sub-Alternative A2 includes a four-story building consisting of approximately 290,000 square feet, three primary parking areas, a stormwater retention pond, and perimeter walking paths among other ancillary improvements. The OPC would be accessed from two locations to the south along North Edgewood Place following the completion of the Spring Creek Parkway which will extend North Edgewood Place.

- **501 Dunlop Lane (Alternative B).** The Alternative B site consists of approximately 20 acres of a developed agricultural field with remaining concrete pads from previous buildings and a partially maintained gravel driveway. The site is bordered by agricultural fields to the north, Ted Crozier Sr. Boulevard and agricultural fields to the west, a hospital and medical buildings to the east and south, as well as Dunlop Lane to the south. The 501 Dunlop Lane site is approximately 6 miles northeast of downtown Clarksville in Montgomery County, TN. An isolated wetland area is located in the northwestern corner of the site with an open water feature currently used for water retention in the northeastern area of the site.

  The site plan for Alternative B provides an L-shaped OPC approximately 290,000 square feet in size with three stories proposed, parking on all sides, two stormwater basins, walking paths, ancillary improvements, and three entrances to the site via a future spine road, connecting Dunlop Lane with Ted Crozier Sr. Boulevard.

- **Rufus Johnson Boulevard & Highway 76 (Alternative C).** The Alternative C site consists of approximately 6 acres of forested area with the remainder of the site being pasture and open space. The site is bordered by commercial property and Rufus Johnson Boulevard and Highway 76 to the south, senior living facilities to the east, a high school complex and road to the west, and single-family homes to the north. The Rufus Johnson Boulevard and Highway 76 site is located approximately 5.2 miles east of downtown Clarksville in Montgomery County, TN. The site contains an isolated wetland area located in the southeastern portion of the site along with three agricultural ponds used for water retention and watering livestock.

  The site plan for this alternative shows a four-story clinic approximately 290,000 square feet in size with parking on all sides, two stormwater retention basins, perimeter walking paths, and natural areas of respite. The OPC would be accessed via four entrances from the future Veterans Way, connecting from Martin Luther King Jr. Parkway to Memorial Drive.

- **No Action Alternative.** Under the No Action Alternative, the Proposed Action would not be implemented. VA would continue to provide services at its four existing leased clinic locations. The three proposed locations would not be used by VA and could possibly be developed by others consistent with local zoning. This alternative would limit VA’s ability to provide needed healthcare services to Veterans in the region. The No Action Alternative does not meet the purpose and need. However, analysis of the No Action Alternative provides a benchmark for comparing and analyzing the effects of the other alternatives.

Affected Environment and Environmental Consequences

Table ES-1 lists the environmental resources evaluated and summarizes the potential impacts to each resource from the Proposed Action and No Action Alternative.

Table ES-1. Summary of Impacts and Best Management Practices

Resource Area	Alternatives A, B, and C	No Action Alternative
Aesthetics	The proposed physical changes under the Alternatives would not detract from the surrounding aesthetics. Aesthetic impacts during construction activities would be temporary and less than significant. Physical changes to the site would be consistent with existing architecture as well as landscaping. Aesthetic impacts would be **less than significant.**	None
Air Quality	Construction activities would have short-term minor impacts related to emissions and fugitive dust. Combined construction and operation emissions would be substantially below the General Conformity maintenance area de minimis threshold. Air quality impacts would be **less than significant.**	None
Cultural and Historic Resources	It is unlikely that the Proposed Action would impact archeological resources eligible for the National Register of Historic Places (NRHP). The OPC would not impact historic buildings since there are no historic buildings in the area of potential effects. For Alternative A, the Johnson-Killebrew Cemetery would be avoided and a 50-foot buffer established. Impacts to the cemetery are not anticipated based on preliminary design. Impacts on cultural and historic resources would be **less than significant.**	None
Geology and Soils	Ground-disturbing activities would have minimal changes to topography. Ground disturbances would be stabilized during operation, and all permit requirements would be met. Impacts on geology and soils would be **less than significant.**	None
Hydrology, Stormwater, and Water Quality	Implementation of measures identified in the National Pollutant Discharge Elimination System (NPDES) permit and site-specific Storm Water Pollution Prevention Plan (SWPPP) would minimize erosion and sedimentation impacts related to construction activity. The SWPPP would contain best management practices (BMPs) designed to minimize stormwater pollution. If shallow groundwater is	None

	encountered during construction, appropriate groundwater control and dewatering measures, such as sump pumps, wellpoint systems, or deep well systems, would be implemented. Onsite stormwater engineering controls to retain and manage stormwater flow would be implemented including retention basins. Construction and operational activities would further comply, to the extent practicable, with local agencies' requirements. *Alternative A*: Onsite stormwater engineering controls to retain and manage stormwater flow would be implemented, and Clean Water Act permit requirements would be met. Construction activities would comply, to the extent practicable, with local agencies' requirements to minimize adverse effects to Waters of the U.S. and Waters of the State (WOTS), and BMPs would be implemented, resulting in **less than significant** impacts to hydrology and downgradient water quality. *Alternative B and C*: Onsite stormwater engineering controls to retain and manage stormwater flow would be implemented, and permit requirements would be met. Construction activities would comply, to the extent practicable, with local agencies' requirements to minimize adverse effects to WOTS, and BMPs would be implemented, resulting in **less than significant** impacts to hydrology and downgradient water quality.	
Wildlife and Habitat	*Alternatives A, B, and C:* In advance of any proposed tree clearing during nesting season (March 1 to September 10 for Alternatives A and C and March 15 to September 10 for Alternative B), the private entity would be required to conduct a pre-construction clearance survey to determine the presence/absence of nesting migratory birds protected under the Migratory Bird Treaty Act, and coordinate with United States Fish and Wildlife Service (USFWS) to determine the potential need for non-disturbance buffers or other mitigation. *Alternatives A and C:* A project review request was submitted to the USFWS Tennessee Ecological Field Office on October 1, 2025, to obtain concurrence with the effect determinations (may affect, not likely to adversely affect) for the Northern Long-eared Bat, Tri-colored Bat, and Indiana Bat species. USFWS time-of-year restrictions for listed bat species would be implemented as indicated in the USFWS project	None

	review request. The private entity would limit tree clearing to the USFWS-recommended clearing period only, and outside of overlapping listed bat species' pup seasons. Tree clearing would be prohibited between April 1 to September 30. Additionally, the private entity would reduce, to the extent feasible, nighttime lighting and noise/vibration near roost habitat during the active pup seasons. The private entity would further maintain a 150-foot buffer around known or potential roost trees during the summer occupancy season; minimize disturbance in foraging and commuting corridors, especially near water bodies and riparian zones; and design construction lighting to reduce glare and minimize nighttime illumination near known bat habitats. The private entity would also minimize fragmentation of forested habitat and maintain travel corridors between foraging and roosting sites. *Alternative C:* A project review request was submitted to the Tennessee Wildlife Resources Agency (TWRA), Region 2 Office on September 26, 2025, to obtain concurrence with the effect determination (may affect, not likely to adversely affect) for the Little Brown Bat. TWRA concurrence was received on October 14, 2025. To reduce potential impacts to the Little Brown Bat, the private entity would limit tree clearing for the Project to avoid the species' summer maternity season (April 1 to October 15). No adverse effects to designated habitat or listed species are anticipated with implementation of conservation measures and BMPs, resulting in **less than significant impacts** to wildlife and habitat.	
Noise	Construction activities would result in **minor short-term noise impacts.** Long-term operational noise within the area of the Proposed Action would be consistent with medical facilities of similar sizes. There are **no significant long-term operational noise impacts.**	None
Land Use	Consultation with the Clarksville-Montgomery County Regional Planning Commission for rezoning to construct and operate the OPC may need to occur. Any land use changes would have a **less than significant** impact.	None
Floodplains and Wetlands	*Alternative A:* Although approximately 4.43 acres of the Alternative A site is within a Special Flood Hazard Area (SFHA) designated as Zone A, which is defined as a high-risk flood zone area, available plans for site development under Sub-	None

	Alternatives A1 and A2 do not propose impacts to the SFHA. A Clean Water Act Section 404 permit from the U.S. Army Corps of Engineers (USACE) and an Aquatic Resource Alteration Permit (ARAP) from Tennessee Department of Environment and Conservation (TDEC) Water Resources Division would be required for impacts to Waters of the United States and/or Waters of the State (WOTS), as applicable. An average 60-foot (minimum 30-foot) water quality buffer, as measured from the top of the stream bank, would be required during construction and would be maintained post construction for Spring Creek. An average 30-foot (minimum 15-foot) buffer would be required for all other WOTS during and post construction. *Alternatives B and C*: Neither Alternative B or C sites are located within a SFHA. Small freshwater ponds and wetlands are present on the sites that are not federally jurisdictional. While the freshwater ponds are unlikely to be jurisdictional WOTS, the wetlands may be considered jurisdictional WOTS. The private entity will obtain the necessary permits from TDEC, Water Resources Division for both temporary and permanent impacts to WOTS. An average 30-foot (minimum 15-foot) buffer would be required for all WOTS during and post construction. **No significant impacts** to floodplains or wetlands are anticipated.	
Socioeconomics	There would be **short-term beneficial impacts** to local employment and personal income during construction activities.	None
Community Services	Construction activities at the site are not expected to place additional substantial demands on police, fire, emergency services, and other community services, resulting in **no significant impacts.**	None
Solid Waste and Hazardous Material	During construction, the presence and use of petroleum and hazardous substances could increase the potential for accidental release or spill; however, minimization measures would make this potential impact **less than significant.** Waste generated during operation of the OPC would be collected and disposed of properly. *Alternatives A and C:*	None

	Phase I Environmental Site Assessments (ESA) revealed no recognized environmental conditions for Alternatives A and C. *Alternative B*: A Phase II ESA was conducted to determine the possibility of contamination from past agricultural land use with onsite storage of petroleum and fertilizer. Based on the Phase II ESA results, previous agricultural business use did not adversely impact the soil and groundwater on the subject property. The recognized environmental condition and significant data gaps were resolved. Solid waste and hazardous materials impacts are anticipated to be **less than significant**.	
Traffic, Transportation, and Parking	Project activities are not anticipated to significantly impact existing or future traffic patterns surrounding the Alternatives. Through construction sequencing and coordination with Montgomery County on short-term road closures during construction, impacts to traffic during construction would be temporary and localized and therefore, **less than significant.** Through coordination and planning, in conjunction with local communities, Montgomery County, and Tennessee Department of Transportation, intersection improvements would be developed to mitigate increased traffic volumes and improve surrounding intersection levels of service. Parking for the OPC would be sized to handle the anticipated volume of cars expected to visit the facility on a daily basis. As a result, impacts to traffic during operational activities would be **less than significant.**	None
Utilities	There would be a negligible increase in the consumption of utilities, including electricity, natural gas, potable water, and stormwater/sanitary sewer discharges. Impacts would be **less than significant.**	None

Agency Coordination and Public Involvement

VA electronically sent a scoping notice to selected federal, state, and local agencies; federally recognized Indian tribes; elected officials; and community stakeholders to solicit input regarding the scope of the EA and environmental issues for in-depth analysis. The scoping notice was published on VA's website at http://www.cfm.va.gov/environmental and in *The Leaf Chronicle* on Friday, November 8, 2024, and Sunday, November 10, 2024, to announce VA's intent to prepare an EA and request scoping input. Copies of correspondence and newspaper notices are provided in Appendix B.

This Draft EA has been published for a 30-day review and comment period. VA electronically sent a notice of availability (NOA) to federal, state, and local agencies; federally recognized Indian tribes;

elected officials; and community stakeholders to solicit input on the Draft EA. The NOA for the Draft EA was published in *The Leaf Chronicle*.

The NOA explained how to obtain the Draft EA electronically from the VA website at http://www.cfm.va.gov/environmental and in print at the Clarksville-Montgomery County Public Library – Main Library located at 350 Pageant Lane, Suite 501, Clarksville, TN 37040. The NOA provided instructions for submitting comments to vacoenvironment@va.gov. VA will summarize and address substantive comments in the Final EA.

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Acronyms and Abbreviations

AMSL	above mean sea level
APE	area of potential effects
ARAP	Aquatic Resource Alteration Permit
AST	aboveground storage tank
BCC	migratory birds of conservation concern
BGEPA	Bald and Golden Eagle Protection Act
BMP	best management practice
CAA	Clean Air Act
CFR	Code of Federal Regulations
CGP	Construction General Permit
CWA	Clean Water Act
dBA	A-weighted decibel scale
EA	environmental assessment
ESA	Environmental Site Assessment
IPaC	Information for Planning and Consultation
LOS	level of service
MBTA	Migratory Birds Treaty Act
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act of 1969
NHPA	National Historic Preservation Act of 1966
NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
OPC	outpatient clinic
PCB	polychlorinated biphenyls
PEM	Palustrine emergent
PFO	Palustrine forested
PM	Particulate Matter
RCRA	Resource Conservation and Recovery Act
REC	Recognized Environmental Condition
SDG	Significant Data Gaps
SFHA	Special Flood Hazard Area
SHPO	State Historic Preservation Office

SSURGO	Soil Survey Geographic Database
SWCA	SWCA Environmental Consultants
SWPPP	Stormwater Pollution Prevention Plan
TDEC	Tennessee Department of Environmental Conservation
TDOA	Tennessee Department of Archaeology
THC	Tennessee Historical Commission
TN-PAH	Tennessee polycyclic aromatic hydrocarbons
TWRA	Tennessee Wildlife Resources Agency
USACE	United States Army Corps of Engineers
U.S.C.	United States Code
USDA	United States Department of Agriculture
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
UST	underground storage tank
VA	U.S. Department of Veterans Affairs
VOCs	volatile organic compounds
WOTS	Jurisdictional Waters of the State
WOTUS	Jurisdictional Waters of the United States

1.0 Introduction

The U.S. Department of Veterans Affairs (VA) prepared this environmental assessment (EA) in accordance with the National Environmental Policy Act (NEPA) of 1969 (42 U.S.C. 4321 et seq.). NEPA requires federal agencies to consider the environmental effects of their proposed actions.

As required under NEPA, this EA considers input from the public, agencies, and tribes into the federal decision-making process; provides the federal decision-maker with an understanding of potential environmental effects of the decision before making it; identifies measures to reduce potential environmental effects; and documents the NEPA process. At the conclusion of the NEPA process, VA will determine whether this EA supports a Finding of No Significant Impact or necessitates the preparation of an Environmental Impact Statement. This EA presents an analysis of the potential impacts on the human environment from construction and operation of the Proposed Action, as well as the impacts of a No Action Alternative.

The Proposed Action is the construction and operation of an approximately 290,000-square-foot outpatient clinic (OPC) with approximately 1,500 parking spaces in Clarksville, Tennessee (TN). The OPC would employ approximately 450 full-time employees. The project would include other site improvements, amenities, landscaped open space areas, and ancillary improvements. The following three locations are being considered for the proposed OPC (Figure 1-1). As further described in Section 2.0 (Proposed Action and Alternatives), two offers for site development are being considered by VA for Alternative A herein referred to as Sub-Alternative A1 and Sub-Alternative A2.

- North Edgewood Place (Alternative A)
- 501 Dunlop Lane (Alternative B)
- Rufus Johnson Boulevard & Highway 76 (Alternative C)

1.1 Background

VA currently provides healthcare services to Veterans from five VA clinics in the general Clarksville area: (1) Clarksville VA Clinic, (2) Dalton Drive VA Clinic, (3) Dover VA Clinic, (4) Fort Campbell VA Clinic, and (5) the Taylor VA Clinic. The current space in these facilities is insufficient to meet the future needs of Veterans. An increasing Veteran population coupled with existing facility patient workload capacities inhibit Veterans from timely access to high-quality healthcare services.

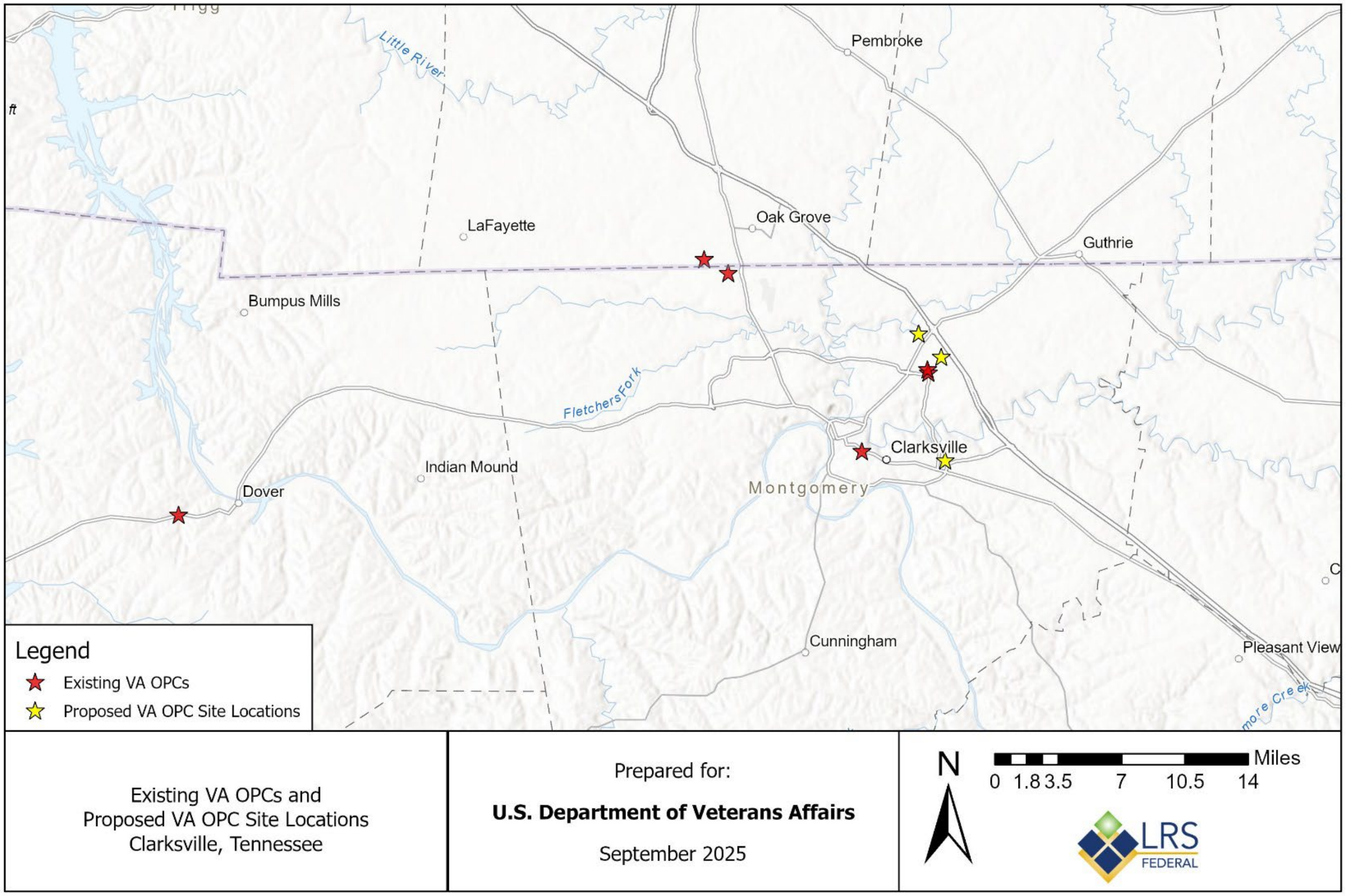
Both the Clarksville and Fort Campbell VA clinics offer primary care and specialty health services including mental health care, telehealth, and laboratory services, with the Clarksville and Dover VA clinics also offering physical therapy, chiropractic care, integrative health, audiology, and social work. The Dalton Drive VA and Taylor VA clinics offer dental care to eligible patients. The Dalton Drive and Clarksville clinics are located around the block from each other, five miles northeast of the city center. The Fort Campbell clinic is located on the Tennessee side of Fort Campbell Army Post inside its Blanchfield Army Community Hospital. VA plans to close the Dalton Drive VA clinic when the new OPC opens.

Figure 1-1 depicts the existing VA medical facilities in the Clarksville vicinity in addition to the three proposed OPC site locations being considered for development.

1.2 Purpose and Need

The purpose of the Proposed Action is to provide outpatient healthcare services to area Veterans. The Proposed Action is needed to provide enhanced and expanded primary care and mental health services and add a comprehensive array of specialty care outpatient services to serve Veterans in Clarksville and the surrounding communities in a modern, state-of-the art facility. The Proposed Action would provide area Veterans timely, convenient access to healthcare and mental health services in a facility that provides specialty treatment programs and has the current and future capacity to serve an increasing patient population. The Proposed Action would address current and future projected health care capacity, service gaps, and operational inefficiencies.

Veterans make up over 17 percent of Clarksville's population, demonstrating the need for VA facilities in the area. Clarksville's high Veteran population is likely due to the presence of the Fort Campbell Army Post along the state's border with Kentucky with Montgomery County having the second largest Veteran population in the state. The Dalton Drive and Taylor clinics solely provide dental care services and there are only two Veteran clinics within the City of Clarksville that provide comprehensive medical care and mental health services. With a current substantial and growing Veteran population, VA needs to expand OPC services to ensure all medical needs are met.



Source:

Commonwealth of Kentucky, Esri, TomTom, Garmin, SafeGraph, FAO, METI/NASA, USGS, EPA, NPS, USFWS, Esri, NASA, NGA, USGS, FEMA, Esri, CGIAR, USGS, Esri Community Maps Contributors, Commonwealth of Kentucky, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, US Census Bureau, USDA, USFWS, Commonwealth of Kentucky, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, US Census Bureau, USDA, USFWS

Figure 1-1. Existing and Proposed VA OPC Site Locations – Site Vicinity Map

2.0 Proposed Action and Alternatives

This section describes the Proposed Action and alternatives considered by VA. After considering several approaches for meeting the purpose and need (Section 1.2), VA elected to acquire a new lease for an OPC with capacity to expand VA-provided healthcare services in the Clarksville area.

2.1 Proposed Action

VA's Proposed Action is to award a lease to a private entity that would construct an approximately 290,000-square-foot OPC for VA to lease and operate for up to 20 years in Clarksville, TN. The proposed VA OPC would be available to Veterans and service members from all branches of the U.S. Armed Forces who meet the criteria for treatment. Operating hours may vary; however, the proposed VA OPC would generally be used Monday through Saturday between the hours of 7 a.m. to 7 p.m., except on federal holidays.

The OPC would be designed and built to VA design criteria and in accordance with local building and zoning codes and include other site improvements, amenities, and landscaped open space areas. The proposed OPC would comprise a maximum of four floors. Project components, in addition to the main OPC building, would include pedestrian pathways, entry and memorial plazas, gardens, an ambulance pick-up and drop-off area, as well as irrigated landscaping throughout the site. A proposed paved parking lot would allow for up to 1,500 parking spaces to accommodate employees and up to an approximate 3,000 patients and visitors per day.

The OPC would be constructed by a private entity for VA to lease and operate at one of three sites being considered: North Edgewood Place, Clarksville, TN; 501 Dunlop Lane, Clarksville, TN; and Rufus Johnson Boulevard and Highway 76, Clarksville, TN (Figure 2-1). Preliminary site plans are available for each location proposed for OPC development.

- **North Edgewood Place (Alternative A)**

  The Alternative A site consists of approximately 68 acres of undeveloped land, consisting of partially deciduous forest and cleared pastureland with Spring Creek intersecting the northern boundary of the site. The site further comprises four streams and an adjacent wetland area located in the eastern portion of the site. The site is located adjacent to Wilma Rudolph Boulevard (Highway 79) and is bordered to the east by multifamily residential buildings, a small private cemetery, and four separate hotels. A Walmart Superstore is located to the southeast and Tennessee Valley Authority (TVA) powerlines run adjacent to the south of the site. The remainder of the surrounding area is undeveloped with a mix of deciduous forest and open pastureland cover. The North Edgewood Place site is approximately 6.5 miles northeast of downtown Clarksville in Montgomery County, TN.

  There are two plans being considered by VA for site development by a private entity for Alternative A.

  Sub-Alternative A1
  The site plan for Sub-Alternative A1 includes a four-story building consisting of approximately 290,000 square feet, four primary parking areas, three stormwater retention ponds, perimeter walking trails, a memorial wall, a flagpole circle, and a healing garden (Figure 2-2). The proposed OPC would be accessed via Fair Brook Place and from two driveways via a future extension of North Edgewood Place following the completion of the Spring Creek Parkway that is under construction (Figure 2-2).

Sub-Alternative A2
The site plan for Sub-Alternative A2 includes a four-story building consisting of approximately 290,000 square feet, three primary parking areas, a stormwater retention pond, and perimeter walking paths among other ancillary improvements. The OPC would be accessed from two locations to the south along North Edgewood Place following the completion of the Spring Creek Parkway that is under construction (Figure 2-3).

- **501 Dunlop Lane (Alternative B)**

  The Alternative B site consists of approximately 20 acres of a developed agricultural field with remaining concrete pads from previous buildings and a partially maintained gravel driveway. The site is bordered by agricultural fields to the north, Ted Crozier Sr. Boulevard and agricultural fields to the west, a hospital and medical buildings to the east and south, as well as Dunlop Lane to the south. The 501 Dunlop Lane site is approximately 6 miles northeast of downtown Clarksville in Montgomery County, TN. An isolated wetland area is located in the northwestern corner of the site with an open water feature currently used for water retention in the northeastern area of the site.

  The site plan for Alternative B provides an L-shaped OPC approximately 290,000 square feet in size with three stories proposed, parking on all sides, two stormwater basins, walking paths, ancillary improvements, and three entrances to the site via a future spine road, connecting Dunlop Lane with Ted Crozier Sr. Boulevard. (Figure 2-4).

- **Rufus Johnson Boulevard & Highway 76 (Alternative C)**

  The Alternative C site consists of approximately 6 acres of forested area with the remainder of the site being pasture and open space. The site is bordered by commercial property and Rufus Johnson Boulevard and Highway 76 to the south, senior living facilities to the east, a high school complex and road to the west, and single-family homes to the north. The Rufus Johnson Boulevard and Highway 76 site is located approximately 5.2 miles east of downtown Clarksville in Montgomery County, TN. The site contains an isolated wetland area located in the southeastern portion of the site along with three agricultural ponds used for water retention and watering livestock.

  The site plan for this alternative shows a four-story clinic approximately 290,000 square feet in size with parking on all sides, two stormwater retention basins, perimeter walking paths, and natural areas of respite. The OPC would be accessed via four entrances from the future Veterans Way, connecting from Martin Luther King Jr. Parkway to Memorial Drive (Figure 2-5).

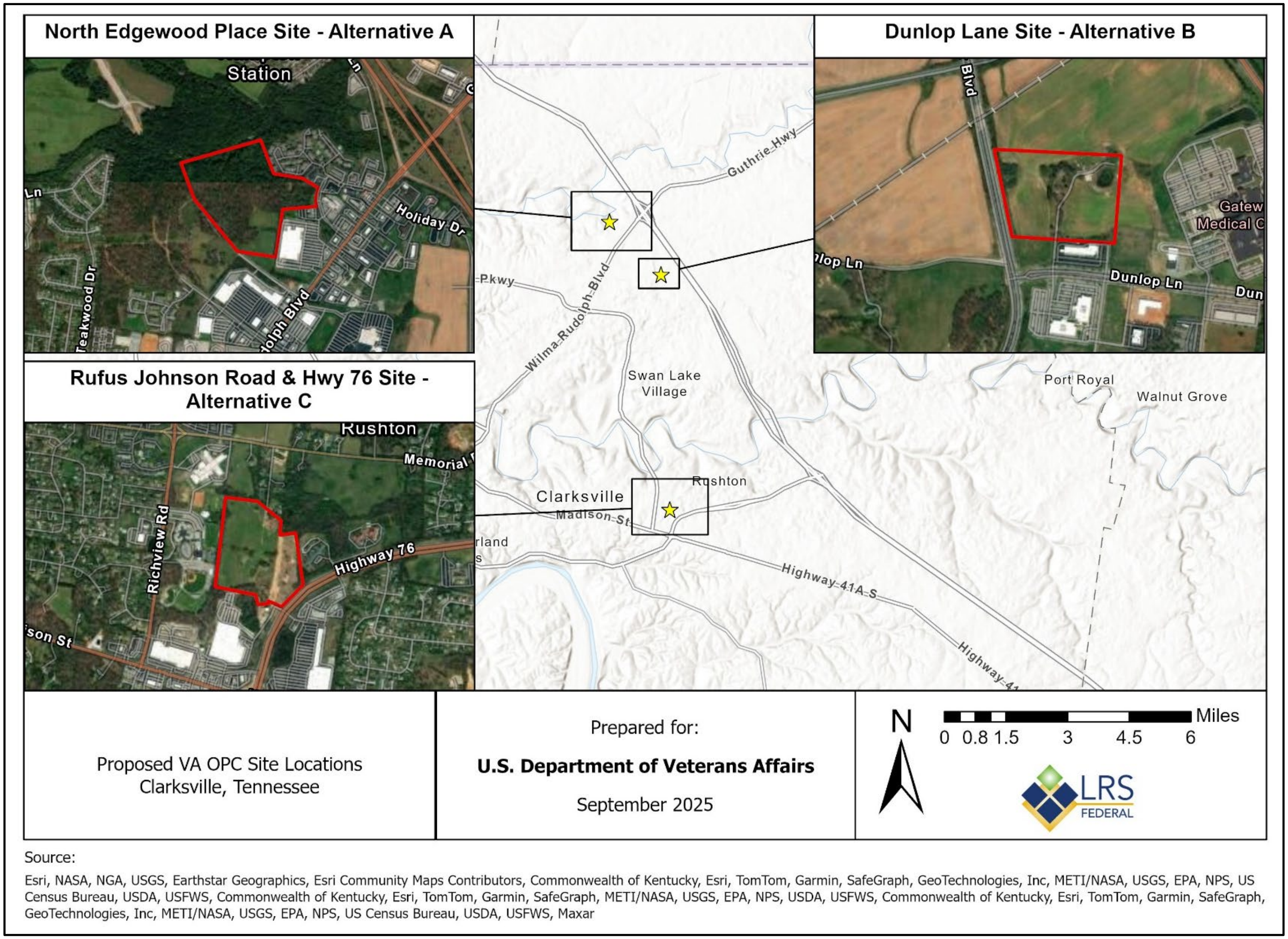


Figure 2-1. Alternative Site Locations Considered for VA OPC

Figure 2-2. Proposed OPC Site Plan for Sub-Alternative A1

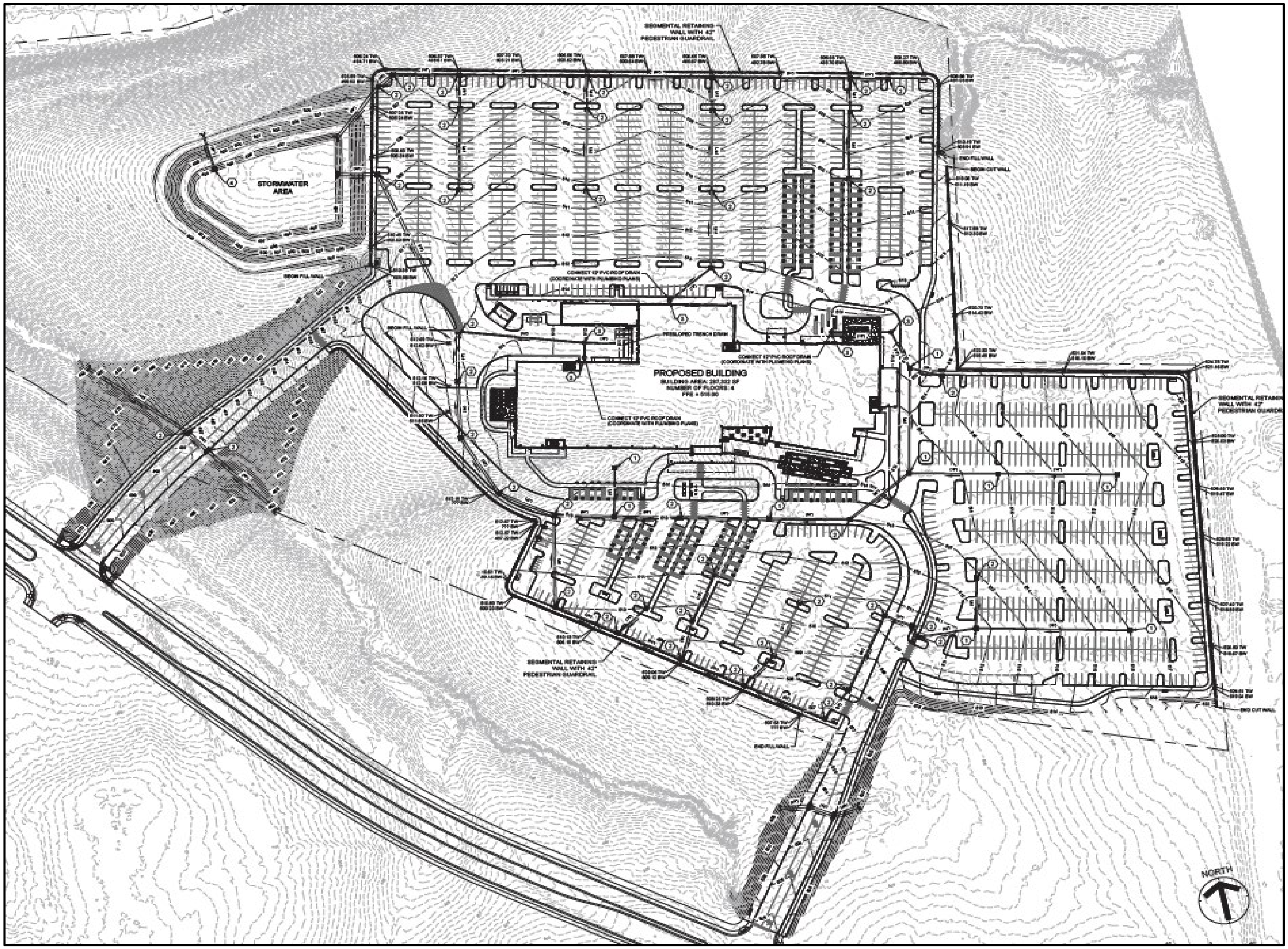


Figure 2-3. Proposed OPC Site Plan for Sub-Alternative A2

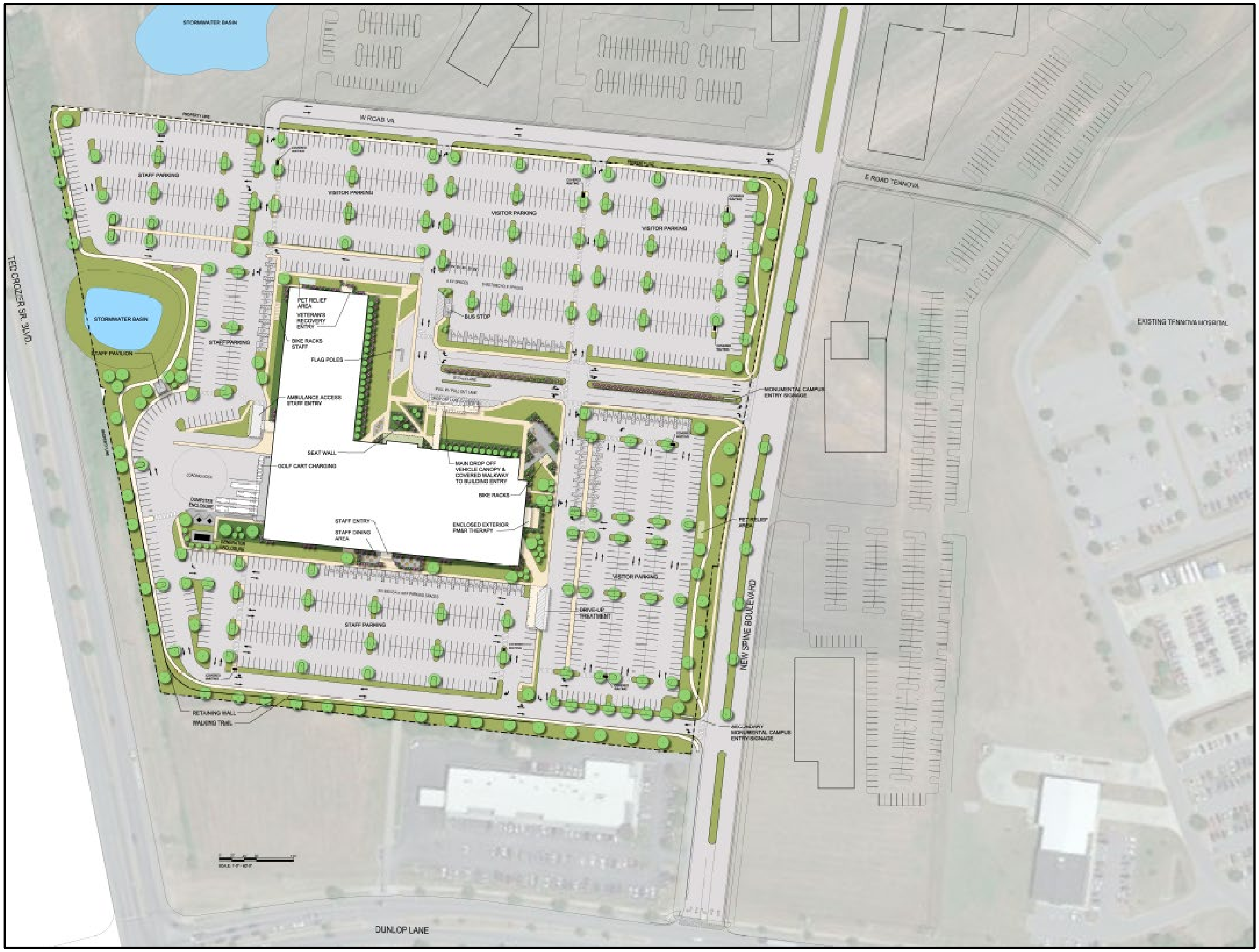


Figure 2-4. Proposed OPC Site Plan for Alternative B

Figure 2-5. Proposed OPC Site Plan for Alternative C

2.2 No Action Alternative

Under the No Action Alternative, the Proposed Action would not be implemented. This alternative would limit VA's ability to provide needed healthcare services to Veterans in the region. The No Action Alternative does not meet the purpose and need. However, analysis of the No Action Alternative provides a benchmark for comparing and analyzing the effects of the other alternatives.

3.0 Affected Environment and Environmental Consequences

This section describes the baseline physical, environmental, cultural, and socioeconomic conditions at the proposed project sites and the general vicinity, with emphasis on those resources potentially impacted.

Impacts are identified as either significant or less than significant. The terms “effects” and “impacts” are synonymous in this EA. Where possible, impacts are identified as short-term, temporary, or long-term in relation to the length of the effect of the impact. Separate subheadings are provided for analysis of the proposed action in this section when environmental consequences are differentiated between the Alternatives and Sub-Alternatives.

Resource areas considered in this EA are aesthetics; air quality; cultural and historic resources; geology and soils; hydrology, stormwater, and water quality; wildlife and habitat; noise; land use; floodplains and wetlands; socioeconomics; community services; solid waste and hazardous materials; traffic, transportation, and parking; and utilities. This section also addresses the potential for generating substantial controversy. VA determined that one resource area was not warranted for further evaluation in this EA. This resource area and the rationale for not pursuing further analysis are presented in Table 3-1.

Table 3-1. Summary of Resource Area Not Analyzed in Further Detail

Resource Area	Anticipated Impacts	Rationale for Not Analyzing in Further Detail
Coastal Zone Management	There is no potential to impact designated coastal zones or a water resource connected to a coastal zone. No further review under the Coastal Zone Management Act is required.	The project site is not within or near a Coastal Zone Management Act boundary; therefore, the resource area does not warrant further analysis.

3.1 Aesthetics

3.1.1 Affected Environment

3.1.1.1 Alternative A

The Alternative A site is located approximately 6.5 miles northeast of downtown Clarksville in Montgomery County at North Edgewood Place, Clarksville, TN. The site consists of undeveloped, wooded land with a creek that bisects its north-central portion and smaller tributaries of the creek that bisect its north and south ends. It is bordered to the east by multifamily residential buildings, a small cemetery, and four separate hotels, and to the southeast by a Walmart Superstore. TVA powerlines run along the south side of the site. The rest of the surrounding area consists of undeveloped, wooded land. The primary access roads in the vicinity of the site are North Edgewood Place to the southwest, Fair Brook Place to the east, and the site is less than a mile southwest of the Interstate 24 exchange.

3.1.1.2 Alternative B

The Alternative B site is located approximately 6 miles northeast of Clarksville in Montgomery County at 501 Dunlop Lane, Clarksville, TN. The site consists of a developed agricultural field with concrete pads left from previously existing buildings and a gravel drive. It is bordered by agricultural fields to the north, Ted Crozier Sr. Boulevard and agricultural fields to the west, medical buildings to the east and south, and Dunlop Lane to the south. To the north there is undeveloped land and a railroad line. The primary access roads in the vicinity of the site are Ted Crozier Sr. Boulevard to the west and Dunlop Lane to the south. This site is located less than 0.5 miles from Interstate 24 to the east, although the nearest onramp to the interstate is approximately 1.5 miles to the north.

3.1.1.3 Alternative C

The Alternative C site is located approximately 5.2 miles east of downtown Clarksville in Montgomery County at Rufus Johnson Boulevard and Highway 76, Clarksville, TN. The site consists of woodlands, pasture, and open space. The site is bordered by commercial property and Rufus Johnson Boulevard to the south, senior living facilities and Highway 76 (Martin Luther King Jr. Parkway) to the east, a high school complex and Richview Road to the west, and single-family homes to the north. The Clarksville Water Tower is adjacent to the site, providing public water. The primary access roads are Highway 76 to the east and Memorial Drive to the north.

3.1.2 Environmental Consequences

VA has established criteria for a private entity to design a modern-quality, up to four-story building that complies with locally adopted codes. The aesthetic concept for the exterior of the building includes a façade of stone, marble, brick, stainless steel, aluminum or other permanent materials. Landscaping for the OPC is required to be integrated with the site design and building aesthetics to provide a welcoming and pleasant environment while providing a visual buffer between adjacent properties.

3.1.2.1 Sub-Alternatives A1 and A2, Alternative B, and Alternative C

All proposed sites would transition from undeveloped land to a developed site with a three to four-story OPC and paved parking area. New structures would be architecturally and visually consistent with surrounding buildings. Visual impacts would be minimized by the attractive design of the OPC and maintained landscaping. The OPC is designed as an unimposing facility compatible with the surrounding properties and land uses. Existing topography and natural features would be incorporated into site design, wherever possible.

Construction activities temporarily affecting aesthetics may include parked construction equipment, excavation/grading, heavy equipment and contractor vehicles using the adjoining roads, and perimeter control/silt fences surrounding the Proposed Action site. The presence of construction equipment during the construction of the OPC would have a minor and temporary adverse effect on the visual quality of the area for surrounding residents for all alternatives. Aesthetic impacts during construction would be temporary and are not considered to represent a significant impact. Impacts on aesthetics as a result of the new OPC would be less than significant.

3.1.2.2 No Action Alternative

Under the No Action Alternative, the OPC would not be constructed or operated. There would be no impacts related to aesthetics associated with the No Action Alternative.

3.2 Air Quality

Air quality refers to the degree of pollution in the air, often assessed by measuring concentrations of pollutants and comparing them to health-based limits set by the U.S. Environmental Protection Agency (USEPA) under the Clean Air Act (CAA) and its associated amendments. Air pollution can adversely affect communities located nearby to stationary and mobile combustion equipment, painting and solvent use areas, and construction/demolition activities that generate fugitive dust.

3.2.1 Affected Environment

The Tennessee Department of Environment and Conservation (TDEC) Division of Air Pollution Control is delegated CAA enforcement authority by the USEPA for air emission sources in the State of Tennessee.

The National Primary and Secondary Ambient Air Quality Standards (NAAQS) of the CAA are set by the USEPA to limit the concentration of air pollutants considered harmful to public health and the environment. Pollutants regulated under the NAAQS include ozone, particulate matter (PM), carbon monoxide, nitrogen dioxide, sulfur dioxide, and lead. Ozone is formed in the atmosphere as a product when nitric oxide, volatile organic compounds (VOCs), and light react. As such, ozone emission reductions are met by reducing emissions of its precursors, nitric oxide and VOCs. The NAAQS limit PM levels according to particle diameter, with separate standards for coarse and fine particulate matter. An area's attainment status with the NAAQS is determined by measuring ambient air quality at the county level. An area can either be designated as an *attainment*, *non-attainment*, or *maintenance* area with the NAAQS. All new and existing sources of air pollution are subject to ambient air quality regulation.

The Alternative A, Alternative B, and Alternative C sites are located in Montgomery County, TN, which is not designated as a nonattainment or maintenance area for any criteria pollutant, as listed in the USEPA's Green Book (USEPA, 2024). If this status changes over the project timeline, the Proposed Action would be subject to General Conformity.

As part of the state's EPA-enforced State Implementation Plan, reasonable precautions must be taken to prevent particulate matter from becoming airborne during construction activities. It is unlawful for fugitive dust emissions to exceed five minutes per hour or twenty minutes per day as to produce a visible emission beyond the property line of the property on which the emission originates, excluding malfunction of equipment.

3.2.1.1 Alternative A

Sensitive air quality receptors in the vicinity of the proposed site include a multi-family residential area and multiple hotels adjacent east of the site and a residential area west of the site, all located within less than one mile.

3.2.1.2 Alternative B

Sensitive air quality receptors in the vicinity of the proposed site include the Tennova Healthcare Clarksville Hospital adjacent east and a residential area southeast of the site, both located less than one mile from the site.

3.2.1.3 Alternative C

Sensitive air quality receptors in the vicinity of the proposed site include Clarksville High School and Richview Middle School adjacent to the west, a residential community to the north, and a senior assisted living facility to the east, all within one mile of the site.

3.2.2 Environmental Consequences

3.2.2.1 Sub-Alternatives A1 and A2, Alternative B, and Alternative C

Construction activities and emissions from construction vehicles would have the potential for short-term and minor impacts on air quality at all alternative sites. Construction activities such as site preparation, grading, and movement of heavy equipment could generate fugitive dust. There could be short-term health effects and nuisances such as reduced visibility. The amount of fugitive dust would be dependent on the soil type, wind speed, size and intensity of the activity, and the type of dust suppression measure implemented. These measures could include applying suppressants or palliatives, such as water, clay additives, or polymers; stabilizing disturbed areas with vegetation or mulch; or limiting earth moving construction activities during high wind conditions.

Exhaust from the operation of construction equipment would generate emissions that would have short-term and minor impacts on air quality. Examples of construction equipment that may be used include excavators, bulldozers, backhoes, graders, front-end loaders, dump trucks, roller compactors, water trucks, pump trucks, cranes, paving machines, and concrete mixer trucks. Measures such as using newer construction equipment with emissions controls and reducing idling of construction equipment would minimize emissions. Emissions would be substantially below the de minimis threshold and, therefore, a General Conformity Determination would not be required for impacts to ozone.

Depending on its fuel source, installation of a heating and/or cooling system in the OPC may require a permit to be obtained from the City of Clarksville as per Title 4 of the Code of Ordinances, and operation of the OPC would have long-term and minor impacts on air quality. Emissions from equipment, such as boilers and generators, and exhaust from vehicles used by patients and staff would generate air pollution. It is anticipated that there would be approximately 450 staff and up to 3,000 patients and visitors per day. These emissions would be expected to have a minor impact on air quality. Regional vehicle emissions related to the OPC would be similar to current emissions as patients and staff who would use the OPC likely travel to one of the other existing clinics. There are plans to close an existing clinic when the new OPC opens, resulting in a balance in negligible changes in emissions.

A Title V operating permit is not anticipated to be required for the proposed OPC. However, VA’s selected private entity would secure any required air emissions permits prior to construction and operation. If designs of the VA OPC indicate it will not be a Title V permitted facility, it may still be subject to minor new source review and will be required to obtain a Non-Title V Construction Permit at least 120 days before starting construction for major sources, and at least 90 days in advance for minor sources, along with air contaminant source and emission point description forms. New Construction Permit applicants who are Non-Title V air contaminant sources are required to apply for a state operating permit within 30 days of startup.

Construction and operation of the OPC would result in less than significant impacts to air quality.

3.2.2.2 No Action Alternative

Under the No Action Alternative, the OPC would not be constructed or operated. There would be no impacts related to air quality associated with the No Action Alternative.

3.3 Cultural and Historic Resources

Historic properties are defined by the National Historic Preservation Act (NHPA) as properties including prehistoric and historic sites, structures, buildings, objects, districts, or any other physical evidence of human activity associated with important historic events, with persons important in history, representing the work of a master or exemplary as a type, or with the potential to yield information important to history or prehistory. Cultural resources are protected through several Federal laws and associated regulations, including the NHPA of 1966, the Archaeological and Historic Preservation Act of 1974, the American Indian Religious Freedom Act of 1978, the Archaeological Resources Protection Act of 1979, and the Native American Graves Protection and Repatriation Act of 1990.

Section 106 of the NHPA and its implementing regulations, 36 CFR Part 800, requires an assessment of the potential effects of an undertaking on historic properties that are within the proposed project’s area of potential effects (APE), which is defined as the geographic area “within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist.”

Analysis of potential effects on cultural resources considers both direct and indirect effects. Direct effects may be the result of physically altering, damaging, or destroying all or part of a resource; altering characteristics of the surrounding environment that contribute to the importance of the resource; introducing visual, atmospheric, or audible elements that are out of character for the period the resource represents (thereby altering the setting); or neglecting the resource to the extent that it deteriorates or is destroyed. An adverse effect according to NHPA Section 106 Criteria for Adverse Effect (36 CFR 800.5) is if an undertaking (action) diminishes any of the characteristics that qualify a property for inclusion in the National Register of Historic Places (NRHP). These effects are analyzed according to the integrity of the property's location, design, setting, materials, workmanship, feeling, and association.

3.3.1 Affected Environment

Pursuant to the NHPA and its implementing regulations, VA has determined that the APE for the proposed project includes the Proposed Action site and all areas within a 0.5-mile buffer surrounding the project boundaries.

All field work performed followed the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation (48 FR 44716) and Professional Qualifications Standards (36 CFR § 61) (SOI Standards), as well as the guidelines and regulations set forth by the Tennessee Department of Archaeology (TDOA).

3.3.1.1 Alternative A

A review of the Tennessee Department of Archaeology (TDOA) database revealed no cultural resources within the project site, and four within the APE. These four cultural resources include a military-frontier station, a Poteet Site, a rural domestic house/stone wall, and the Rosenwald DV-07 Haynes School, none of which has been evaluated by the Tennessee State Historic Preservation Officer (SHPO).

A pedestrian survey investigation was conducted by SWCA Environmental Consultants (SWCA) between October and November 2024 on the Proposed Action site, revealing one chert flake in the southwestern portion of the property. A Phase I Archeological Survey and subsurface testing was additionally conducted following the guidelines and regulations set forth by the Tennessee Historical Commission (THC), during which 17 shovel tests yielded 77 chert flakes associated with the precontact era, enough to constitute an archaeological site. The subsurface testing revealed that the site is likely a series of short-term campsites with the chert presumably disturbed by earthmoving activities spreading the flakes throughout the property. The probability of additional work revealing significant new information of the regional precontact period is low, therefore, this site is recommended ineligible for listing in the NRHP (SWCA, 2025).

As a result of the architectural survey performed in tandem with the cultural resources survey, one private cemetery was identified partially within and adjacent to the eastern portion of the project area. The Johnson-Killebrew Cemetery is unrecorded and includes 33 interred individuals with the oldest year of burial being 1855 (Elizabeth Ann Johnson Lester). The newest interment is attributed to Bettie E. Ann Golder (1928).

3.3.1.2 Alternative B

A review of the TDOA database revealed no cultural resources within the project site or the APE.

A pedestrian survey investigation was conducted by SWCA between October and November 2024 on the Proposed Action site, with no cultural resources being identified as a result of the survey. Archeological subsurface testing was conducted following the guidelines and regulations set forth by the THC, during which 23 shovel tests yielded no cultural material (SWCA, 2025).

As a result of the architectural survey, no post-contact era (45-years or older) structures were identified within the project area or viewshed.

3.3.1.3 Alternative C

A review of the TDOA database revealed no cultural resources within the project site and one within the APE. The one previously identified isolated precontact artifact is an isolated Paleoindian artifact.

A pedestrian survey investigation was conducted by SWCA between October and November 2024 on the Proposed Action site, with no cultural resources being identified as a result of the survey. Archeological subsurface testing was conducted following the guidelines and regulations set forth by the THC, during which 52 shovel tests yielded no cultural material (SWCA, 2025).

As a result of the architectural survey, no post-contact era (45-years or older) structures were identified within the project area or viewshed.

3.3.2 Environmental Consequences

3.3.2.1 Sub-Alternative A1

The OPC would be designed and constructed to VA design criteria and in accordance with local building and zoning codes.

A private cemetery was identified partially within and adjacent to the eastern portion of the project area for Alternative A. The Johnson-Killebrew Cemetery is completely delineated by an existing fence, and avoidance from ground disturbing impacts would be accomplished by implementing a 50-foot buffer around the cemetery within the area of OPC development. Under Sub-Alternative A1, the OPC would be accessed from two locations to the south along North Edgewood Place in addition to an entrance from Fair Brook Place to the north. The Johnson-Killebrew Cemetery is located approximately 50 feet south of the proposed Fair Brook Place entrance. As proposed under Sub-Alternative A1, the Gateway Park and associated landscaping would fall within 50 feet of the Johnson-Killebrew Cemetery. As such, the private entity would be required to refine the site layout to accommodate a 50-foot buffer around the cemetery. The proposed landscaping would provide a visual buffer between the cemetery and the Fair Brook Place entrance to the north.

No historic or cultural resources considered eligible for listing in the NRHP were identified during field investigations conducted in October and November 2024 at the Alternative A location. The Proposed Action would lead to a low risk for inadvertent discovery of pre-contact or post-contact cultural resources. Through minor refinements in final design, a 50-foot buffer around the Johnson-Killebrew Cemetery would be established. It is therefore unlikely that the Proposed Action would impact archeological resources. Impacts on cultural resources as a result of the new OPC proposed under Sub-Alternative A2 are anticipated to be less than significant.

If the Proposed Action's scope of work changes from that which was submitted to the THC under Section 106 of the NHPA, VA will notify consulting parties. Construction activities would adhere to all applicable federal and state cultural resource protection and historic preservation regulations. In the event human remains or other cultural items, as defined by applicable state law, are found during construction or operation of the OPC, work would be halted in the area, and the appropriate authorities including VA's Federal Preservation Officer, the SHPO, and federally recognized Indian tribes would be contacted.

3.3.2.2 Sub-Alternative A2

The OPC would be designed and constructed to VA design criteria and in accordance with local building and zoning codes.

A private cemetery was identified partially within and adjacent to the eastern portion of the project area for Alternative A. The Johnson-Killebrew Cemetery is completely delineated by an existing fence, and avoidance from ground disturbing impacts would be accomplished by implementing a 50-foot buffer around the cemetery within the area of OPC development. The OPC would be accessed from two locations to the south along North Edgewood Place under Sub-Alternative A2 and no site development is proposed adjacent to Fair Brook Place to the north where the Johnson-Killebrew Cemetery is located.

No historic or cultural resources considered eligible for listing in the NRHP were identified during field investigations conducted in October and November 2024 at the Alternative A location. The Proposed Action would lead to a low risk for inadvertent discovery of pre-contact or post-contact cultural resources. It is therefore unlikely that the Proposed Action would impact archeological resources. Impacts on cultural resources as a result of the new OPC proposed under Sub-Alternative A2 are anticipated to be less than significant.

If the Proposed Action’s scope of work changes from that which was submitted to the THC under Section 106 of the NHPA, VA will notify the consulting parties. Construction activities would adhere to all applicable federal and state cultural resource protection and historic preservation regulations. In the event human remains or other cultural items, as defined by applicable state law, are found during construction or operation of the OPC, work would be halted in the area, and the appropriate authorities including VA’s Federal Preservation Officer, the SHPO, and federally recognized Indian tribes would be contacted.

3.3.2.3 Alternatives B and C

The OPC would be designed and constructed to VA design criteria and in accordance with local building and zoning codes.

No cultural and historic resources considered eligible for listing in the NRHP were identified during field investigations conducted in October and November 2024 at the Alternative B and C location APEs. The Proposed Action would lead to a low risk for inadvertent discovery of post-contact or pre-contact cultural resources. It is therefore unlikely that the Proposed Action would impact archeological resources. Impacts on cultural resources as a result of the new OPC proposed under Alternatives B and C are anticipated to be less than significant.

If the Proposed Action’s scope of work changes from that which was submitted to the THC under Section 106 of the NHPA, VA will notify consulting parties. Construction activities would adhere to all applicable federal and state cultural resource protection and historic preservation regulations. In the event human remains or other cultural items, as defined applicable state law, are found during construction or operation of the OPC, work would be halted in the area, and the appropriate authorities including VA’s Federal Preservation Officer, the SHPO, and federally recognized Indian tribes would be contacted.

3.3.2.4 No Action Alternative

Under the No Action Alternative, the OPC would not be constructed or operated. There would be no impacts related to historic or cultural resources associated with the No Action Alternative.

3.4 Geology and Soils

The geology of an area is characterized by the existing rocks and sediment present. Geologic materials interact with overlying soils by providing minerals and nutrients through weathering. The physical characteristics of soils and underlying bedrock can affect the suitability of a site for development and dictate the types of precautionary measures that should be implemented during earth disturbance activities.

The Farmland Protection Policy Act is intended to minimize the impact Federal programs have on the unnecessary and irreversible conversion of farmland to nonagricultural uses and requires Federal agencies to evaluate impacts to prime or unique farmlands using U.S. Department of Agriculture (USDA) scoring criteria for identifying effects of conversion.

3.4.1 Affected Environment

Radon is an invisible, radioactive gas generated during the breakdown of uranium in rocks and soils and tends to accumulate in below-grade areas of buildings, where the air circulation is restricted. Montgomery County is designated as a Zone 2 area for radon, meaning predicted average indoor screening levels are at or below the USEPA's 4.0 pico-Curies per liter action level.

All of the alternative Proposed Action sites are within USEPA Level IV Ecoregion Western Highland Rim, which is characterized by dissected, rolling terrain of open hill with elevations of 400-1000 feet, and a geologic base of Mississippian-age limestone, chert, and shale that is covered by soil tending to be cherty, acid, and low to moderate in fertility (USEPA, 2024).

3.4.1.1 Alternative A

According to the Natural Resources Conservation Service (NRCS) Soil Survey Geographic Database (SSURGO), the predominant soil association found within the Proposed Action site is the Sengtown gravelly silt loam, with 12 to 20 percent slopes, Two of the soil units listed by NRCS within the project site: Arrington silt loam and Pembroke silt loam, are classified as either prime farmland or farmland of local importance (USDA, 2025), as depicted in Figure 3-1.

Average elevation at the site ranges from approximately 450 feet above mean sea level (amsl) to 500 feet amsl. Topography indicates that the site generally slopes to the north and there are no structural improvements on site.

3.4.1.2 Alternative B

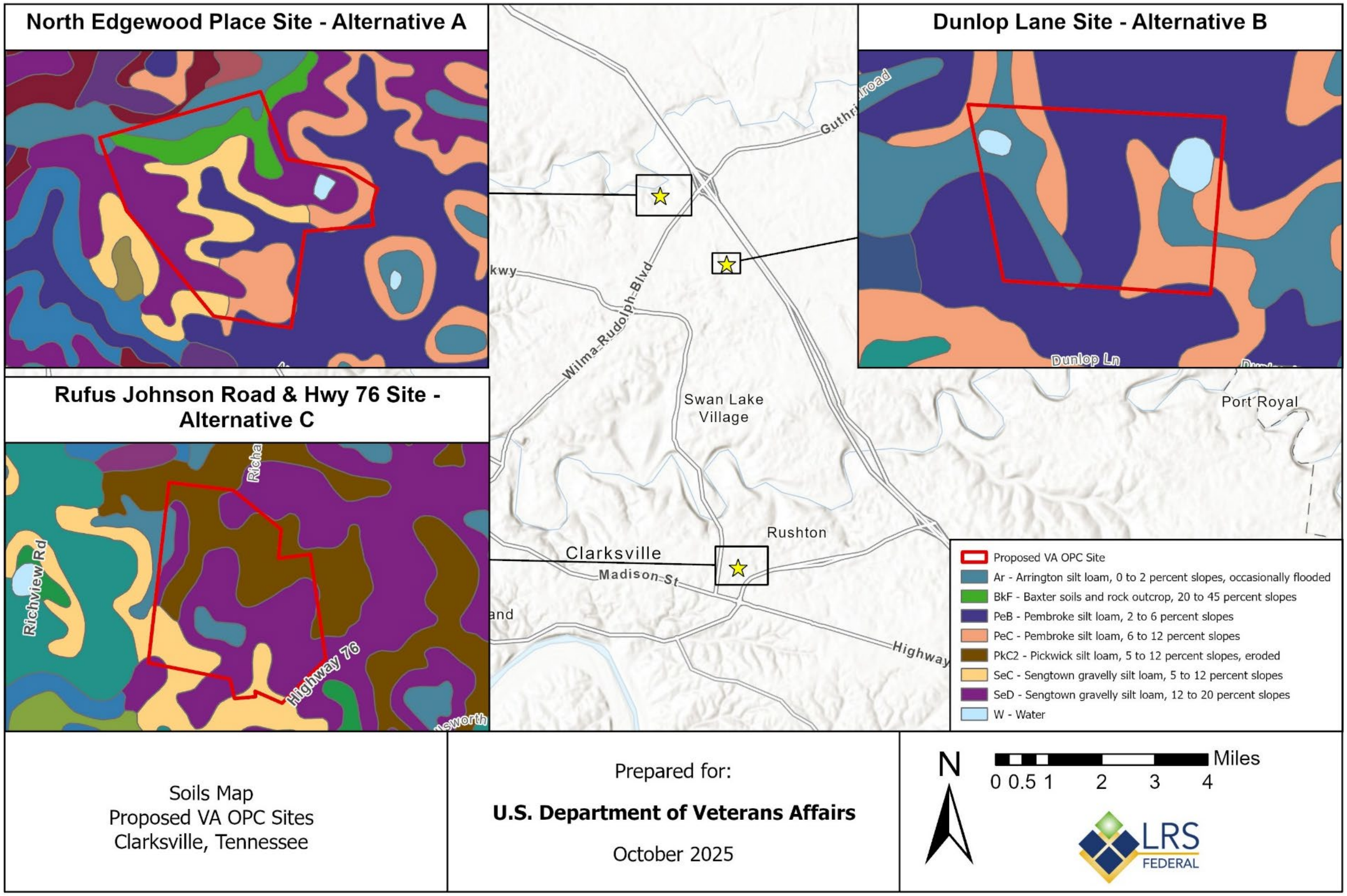
According to the NRCS SSURGO, the predominant soil association found within the Proposed Action site is the Pembroke silt loam, with 2 to 6 percent slopes, and 6 to 12 percent slopes, as depicted in Figure 3-1. A majority of the soil units listed by NRCS within the project site are classified as prime farmland (USDA, 2025).

Average elevation at the site ranges from approximately 520 amsl to 550 feet amsl. Topography indicates that the site generally slopes to the north and east. Aside from a few concrete pads and gravel drive, there are no structural improvements on site.

3.4.1.3 Alternative C

According to the NRCS SSURGO, the predominant soil associations found within the Proposed Action site is the Sengtown gravelly silt loam, with 5 to 12 percent slopes, and 12 to 20 percent slopes, and the Pickwick silt loam, with 5 to 12 percent slopes, as depicted in Figure 3-1. One portion of soil unit listed by NRCS within the project site, the Arrington silt loam covering approximately 6.8 percent of the site, is classified as prime farmland (USDA, 2025).

Average elevation at the site ranges from approximately 450 feet amsl to 500 feet amsl. Topography indicates that the site generally slopes to the north and there are no structural improvements on site.



Source:

Esri, NASA, NGA, USGS, Esri, NASA, NGA, USGS, FEMA, Esri Community Maps Contributors, Commonwealth of Kentucky, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, US Census Bureau, USDA, USFWS, Commonwealth of Kentucky, Esri, TomTom, Garmin, SafeGraph, METI/NASA, USGS, EPA, NPS, USDA, USFWS

Figure 3-1. Soil Types in Clarksville, Tennessee

3.4.2 Environmental Consequences

3.4.2.1 Sub-Alternatives A1 and A2, Alternative B, and Alternative C

Construction of the OPC and parking areas at the alternative sites would result in only minor changes to topography. The design of the OPC considers the current topography, and while some grading would be required, it is anticipated that the outpatient facility, parking areas, and landscaped areas would be constructed near current grades. Fill would be reutilized onsite for grading and suitable fill material would be imported as needed to level the site and achieve standards following excavation.

Construction activities, such as site preparation, grading, movement of heavy equipment, and paving of parking areas, could temporarily increase sedimentation and erosion. These activities would disturb the soil, compact the soil, and remove vegetation which could make the soil more susceptible to erosion by wind and water runoff. These activities would expose soil surfaces and could increase the potential for sedimentation and surface runoff.

The private entity would need to obtain a National Pollutant Discharge Elimination System (NPDES) Construction General Permit (CGP); develop an Erosion and Sediment Control Plan, which would ensure that best management practices (BMPs) such as fugitive dust suppression are included in construction plans; and apply for a Montgomery County Grading Permit. Impacts on geology and soils are expected to be less than significant.

3.4.2.2 No Action Alternative

Under the No Action Alternative, the OPC would not be constructed or operated. There would be no impacts to geology or soils at the site as a result of the No Action Alternative.

3.5 Hydrology, Stormwater, and Water Quality

Federal regulations related to stormwater and water quality include the Clean Water Act (CWA) of 1972, amended in 1987, which established the NPDES program, and the Safe Drinking Water Act of 1974. Permits associated with these programs are issued through the TDEC Division of Water Resources.

Construction activities in Tennessee that disturb one or more acres of soil or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain a NPDES CGP (Permit for Discharges of Stormwater Associated with Construction Activities, TNR100000), per Rule 0400-40-10-.03 of the TDEC Division of Water Resources. Submission of a Notice of Intent for Construction Activity – Stormwater Discharges with a site-specific Stormwater Pollution Prevention Plan (SWPPP) is required to obtain a CGP from the TDEC Division of Water Resources.

Montgomery County Commission Resolution 24-2-2 § 3 outlines required permits and regulatory requirements to manage stormwater discharges to the Waters of the State of Tennessee (WOTS). The county has adopted The Nashville-Davidson County Metropolitan Stormwater Management Manual Volume 2, 4, and 5, as well as the Tennessee Permanent Stormwater Management and Design Guidance Manual and TDEC Erosion and Sediment Control Handbook as its Municipal Separate Storm Sewer System (MS4) Stormwater Construction Best Management Practices Manuals.

A Land Development Permit is required for all land development, including new development, redevelopment, and construction activities. A Land Development Permit will be required from the county for land disturbance of one acre or more. A Land Disturbance Permit is required for construction activities. To obtain a Land Disturbance Permit, proof of coverage under the Tennessee CGP, a copy of the SWPPP, and additional applicable local, state, and federal permits are required by the county when requested.

To ensure all Erosion Prevention and Sediment Control measures are being properly implemented in accordance with the adopted stormwater control measure manuals listed in the Montgomery County Stormwater Regulations, all active construction sites in the county will be inspected monthly unless a different inspection interval is deemed necessary by the stormwater coordinator. Any area of land where development activities have caused the whole or partial clearing of natural vegetative cover must be stabilized.

3.5.1 Affected Environment

The City of Clarksville, TN is in the Cumberland River Basin within the Red River Watershed. The Cumberland River is 688 miles long, starting in eastern Kentucky on the Cumberland Plateau, flowing southeast into Tennessee and then northwest back into western Kentucky and draining into the Ohio River. Part of the Cumberland River drainage basin, Red River Watershed drainage area, is approximately 1,453 square miles with approximately 1,268 miles of stream and rivers. Around 250,000 people live in the watershed making it highly developed and one of the most populated watersheds in the Cumberland Basin. As a result, 29 percent of its rivers and streams are considered impaired due to the presence of pathogens and pollution from excess nutrients, sediments, and loss of riparian habitat. A large portion of the basin, 42 percent, remains unassessed.

3.5.1.1 Alternative A

The Alternative A site is intersected by Spring Creek along its northwest portion. The Creek feeds into the Red River, and eventually the larger Cumberland River. Following field delineation of the site, four waterways were identified and determined to possess relatively permanent water flow. Additionally, a wetland was delineated in the eastern portion of the site. For more detailed information regarding streams and wetlands located at the site, including jurisdictional status, see Section 3.9.

The general hydrologic gradient at the site is to the northeast. According to the USDA Web Soil Survey, the site's approximate depth to the water table is more than 80 inches.

3.5.1.2 Alternative B

The Alternative B site contains a wetland in the northwest corner of the site and an artificial pond in the northeast section of the site. For more detailed information regarding these water features, including jurisdictional status, see Section 3.9.

The general hydrologic gradient at the site is to the north. According to the USDA Web Soil Survey, the site's approximate depth to the water table is more than 80 inches.

3.5.1.3 Alternative C

The Alternative C site contains one wetland on the southeastern portion of the site and three artificial ponds used for watering livestock and water retention. For more detailed information regarding these water features, including jurisdictional status, see Section 3.9.

The general hydrologic gradient at the site is to the east and northeast. According to the USDA Web Soil Survey, the site's approximate depth to the water table is more than 80 inches.

3.5.2 Environmental Consequences

Construction activities at all alternative sites would include site preparation, grading, movement of heavy equipment, and paving of parking areas, which could temporarily increase sedimentation and erosion. These activities would expose soil surfaces and could increase the potential for sedimentation and surface runoff. Implementation of measures from the approved Erosion and Sediment Control Plan, the required Tennessee issued NPDES permit, and the SWPPP would prevent erosion and sedimentation impacts. The

NPDES permit and SWPPP identify potential stormwater contaminants and address how to minimize stormwater pollution. The SWPPP would contain BMPs designed to prevent stormwater pollution such as temporary construction entrances, silt fences, inlet protection, ditch checks, slope protection, and sediment barriers. Machinery servicing and refueling areas would also be located away from waterways to reduce the possibility and minimize the impacts of any accidental spills or discharges during construction. Although unlikely, if shallow groundwater is encountered during construction, appropriate groundwater control and dewatering measures, such as sump pumps, wellpoint systems, or deep well systems, would be implemented.

The proposed OPC would be a slab-on-grade building and would be connected to the municipal water supply. Impervious surfaces would include an OPC building and surrounding pavement for approximately 1,500 public parking spaces and loading areas. During operation of the OPC, the impervious and hardened surfaces would increase surface runoff with the potential for erosion and sedimentation. However, landscaping, vegetation cover, and the stormwater controls designed for the OPC consistent with the MS4 Stormwater Construction Best Management Practices Manuals for the county would reduce these effects. The stormwater system would capture runoff from storm events via inlets throughout the proposed parking area and reduce the potential risk of contaminants entering the watershed.

3.5.2.1 Sub-Alternative A1

Site Plan No. 1 under Alternative A includes three stormwater retention ponds surrounding the OPC that would provide storage capacity to attenuate surface runoff during rainfall events, with the additional opportunity to provide aesthetic, amenity, and ecological benefits to the local landscape. The area around each retention pond would be vegetated, slowing runoff and supporting infiltration, which would improve water quality at the site.

With the designed stormwater management facilities and controls, the construction and operation of the OPC would have less than significant impacts to hydrology, stormwater, and water quality. Potential impacts to wetland areas, including water quality riparian buffer requirements, are described in Section 3.9.

3.5.2.2 Sub-Alternative A2

Site Plan No. 2 under Alternative A includes one stormwater area, northwest of the OPC, that would store excess runoff from the site and provide aesthetic, amenity, and ecological benefits to the local landscape. With the designed stormwater management facilities and controls, the construction and operation of the OPC would have less than significant impacts to hydrology, stormwater, and water quality. Potential impacts to wetland areas, including water quality riparian buffer requirements, are described in Section 3.9.

3.5.2.3 Alternative B

Stormwater retention basins are proposed west and north of the OPC. Vegetation surrounding the ponds would slow runoff, support infiltration for improved water quality, and provide aesthetic, amenity, and ecological benefits to the landscape.

With the designed stormwater management facilities and controls, the construction and operation of the OPC would have less than significant impacts to hydrology, stormwater, and water quality. Potential impacts to wetland areas, including water quality riparian buffer requirements, are described in Section 3.9.

3.5.2.4 Alternative C

Stormwater retention basins are included in the site design to the northeast and east of the OPC. These basins would be surrounded by vegetation which would serve to slow runoff, support infiltration for improved water quality, and provide aesthetic, amenity, and ecological benefits to the landscape.

With the designed stormwater controls, the construction and operation of the OPC would have less than significant impacts to hydrology, stormwater, and water quality. Potential impacts to wetland areas, including water quality riparian buffer requirements, are described in Section 3.9.

3.5.2.5 No Action Alternative

Under the No Action Alternative, the OPC would not be constructed or operated. There would be no impacts to hydrology, stormwater, or water quality at the site as a result of the No Action Alternative.

3.6 Wildlife and Habitat

Biological resources include living, native, or naturalized plant and animal species and the habitats within which they occur. Plant associations are referred to generally as vegetation, and animal species are referred to generally as wildlife. Habitat can be defined as the resources and conditions present in an area that supports a plant or animal. This EA analyzes threatened, endangered, and otherwise protected species that have potential to occur near the sites being considered for development. For purposes of this EA, biological resources are divided into major categories: Federal- and State-listed protected species, migratory birds of conservation concern (BCC), bald and golden eagles, and vegetation.

3.6.1 Affected Environment

3.6.1.1 Federal- and State-Listed Species

Under the Endangered Species Act of 1973, Federal agencies must ensure that any action they carry out or authorize is not likely to jeopardize the continued existence of any listed species or destroy or adversely modify its critical habitat.

The U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) system data, the USFWS Critical Habitat Portal, and the TDEC Division of Natural Areas Rare Species by Quadrangle review identified special-status species with potential to occur in the Proposed Action sites.

Biological surveys of the Proposed Action sites for Alternatives A, B and C were conducted on October 29, 2024 and October 30, 2024 to support an Endangered Species Act Biological Survey Review and Habitat Assessment. Table 3-2 provides an evaluation of special-status species including BCCs with potential to occur within the Alternative A, B, and C sites. VA's species evaluation for the potential to occur is based on USFWS IPaC system data, TDEC available data, and field reconnaissance surveys.

Following informal consultation initiated with the USFWS Tennessee Ecological Field office for Alternative A on March 3, 2024, a species-specific survey was completed for Price's potato bean on July 21, 2025, as recommended by USFWS. The survey was performed during the appropriate survey window as requested by USFWS and no Price's potato bean individuals were observed. USFWS consultation records are provided in Appendix B.

3.6.1.2 Migratory Birds of Conservation Concern

Birds of conservation concern are species that are priorities for conservation action associated with ecological Bird Conservation Regions. Designation as a BCC, in itself, does not carry with it regulatory protections. However, BCC species are protected under the Migratory Birds Treaty Act (MBTA). Under the MBTA, unless permitted by regulations, it is unlawful to 1) pursue, hunt, take, capture, or kill; 2) attempt to take, capture, or kill; and 3) possess, offer to sell, barter, purchase, deliver, or cause to be shipped, exported, imported, transported, carried, or received any migratory bird, part, nest, egg, or product, manufactured or not. USFWS regulations broadly define "take" under the MBTA to mean "pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to pursue, hunt, shoot, wound, kill, trap, capture, or collect." Under the MBTA, "take" does not include habitat loss or alteration.

The following BCC species, which are afforded protection under the MBTA, have potential to occur within the Proposed Action sites of Alternative A, Alternative B, and Alternative C:

- Black Billed Cuckoo (*Coccyzus erythropthalmus*)
- Bobolink (*Dolichonyx oryzivorus*)
- Cerulean Warbler (*Setophaga cerulea*)
- Chimney Swift (*Chaetura pelagica*)
- Field Sparrow (*Spizella pusilla*)
- Grasshopper Sparrow (*Ammodramus savannarum perpallidus*)
- Kentucky Warbler (*Geothlypis Formosa*)
- Lesser Yellowlegs (*Tringa flavipes*)
- Prairie Warbler (*Setophaga discolor*)
- Prothonotary Warbler (*Protonotaria citrea*)
- Red-headed Woodpecker (*Melanerpes erythcephalus*)
- Rusty Blackbird (*Euphagus carolinus*)
- Semipalmated Sandpiper (*Calidris pusilla*)
- Wood Thrush (*Hylocichla mustelina*)

The USFWS IPaC identified Bald Eagles as having potential to occur in the Proposed Action site. The Bald Eagle Mapper determined there were no Bald Eagle nests within one mile of any of the Proposed Action sites. No nests or individuals were observed during the field surveys. Bald Eagles are protected under both the MBTA and the Bald and Golden Eagle Protection Act (BGEPA). The BGEPA prohibits the take, possession, and transportation of bald and golden eagles or their parts, eggs, or nests without authorization (16 U.S.C. 668–688(d)). The USFWS may issue permits to take bald or golden eagles or their nests for certain activities, provided the taking is compatible with the preservation of these species (50 CFR Part 22).

3.6.1.3 Vegetation and Ground Cover

Vegetation provides habitat for wildlife species and helps maintain the water quality of nearby waterways by filtering and reducing the flow of runoff. Vegetation also helps prevent erosion.

Alternative A

The Alternative A site consists of undeveloped pastureland and partially forested land cover, with Spring Creek bisecting its northern portion. Spring Creek feeds into the Red River, and eventually the larger Cumberland River downstream. The site additionally comprises four waterways that possess relatively permanent surface water flow and a wetland area located in the eastern portion of the site. For more detailed information regarding streams and wetlands located at the site, including jurisdictional status, see Section 3.9. The site is dominated by deciduous forest (82.9 percent) and pasture/hay (11.3 percent), followed by developed low intensity, developed medium intensity, developed open space, developed high intensity, mixed forest, and woody wetlands, together totaling 5.9 percent of the proposed site area.

Two non-wetland/upland vegetation types were identified in October 2024. One wetland community type was identified in July 2025. The canopy of the forested area is dominated by Tulip Tree, Sugar Maple, and Pignut Hickory. American Hophornbeam was found to be the dominant shrub species, and Japanese Stiltgrass the dominant herbaceous species. The dominant herbaceous species present in the wetland area are Swamp Smartweed and Black Willow.

Alternative B

The Alternative B site consists of a developed agricultural field with a wetland area and small freshwater pond on site. The site is dominated by cultivated crop lands (76.3 percent), followed by developed low intensity (12.1 percent), developed open space (5.5 percent), developed medium intensity (5.0 percent), and pasture/hay.

Three vegetation community types were identified in October 2024: one Palustrine Forested (PFO) Wetland and two non-wetland/upland vegetation communities. Within the PFO wetland, the dominant tree species was found to be Black Willow, and the dominant sapling/shrub species was found to be Black Willow, Swamp Smartweed, and Giant Cane.

Alternative C

The Alternative C site consists of a mix of open pasture (hay) and disturbed open space (87.8 percent) and minimal deciduous forested areas (12.2 percent). The site further contains one wetland in the southeastern portion of the site and three artificial ponds that are used for watering livestock as well as stormwater retention.

Three vegetation community types were identified in October 2024: one Palustrine Emergent (PEM) Wetland and two non-wetland/upland vegetation communities. Within the PEM wetland, the dominant herbaceous species identified were Blunt Spikerush, Tall Flatsedge, and Swamp Smartweed.

Table 3-2. Evaluation of Special-Status Species with Potential to Occur Within Alternatives

Common Name (*Scientific Name*)	**Status**	**Alternative**	**Range or Habitat Requirements**	**Potential For Occurrence in Proposed Action Site**
Amphibians				
Eastern Hellbender (*Cryptobranchus alleganiensis alleganiensis*)	SP	C only	This species is found in rocky, clear creeks and rivers with large shelter rocks.	Unlikely to occur. No preferred habitat was not identified in the Proposed Action site; therefore, no impacts are anticipated to this species.
Birds				
Bald Eagle (*Haliaeetus leucocephalus*)	BGEPA, MBTA, SP	A, B, C	Ranges throughout North America. Breeds in forested areas near large bodies of water. Bald Eagles winter on reservoirs and large rivers in Tennessee. Nest in tall trees or cliffs near water, with breeding pairs typically returning to the same nest annually. In Tennessee, egg laying peaks in late February.	***Alternatives A and B**:* Unlikely to occur. Tall trees were observed within and bordering the Proposed Action sites; however, there are no large rivers or lakes present within the Proposed Action sites. The nearest Bald Eagle observation occurred in March 2019, approximately 2 miles south of the Proposed Action sites. ***Alternative C:*** Unlikely to occur. Tall trees were observed within and bordering the Proposed Action site; however, there are no large rivers or lakes present within the Proposed Action site. There are 22 occurrences of Bald Eagles within three miles of the Proposed Action site, with the nearest occurrence of a bald eagle individual occurring in September 2022 approximately 0.38 miles south closer to the Cumberland River.
Whooping Crane (*Grus americana*)	EPNE	A, B, C	This species relies on shallow marshes and adjacent open grasslands. Whooping cranes will use a variety of habitats during migration and feeding,	Unlikely to occur. Although the Proposed Action sites are within the range for this species, there are no known occurrences within ten miles, and suitable habitat is not present within the Proposed Action sites. The nearest, most recent observation of this

			predominantly in palustrine or riverine wetland systems but also in lacustrine wetlands, agricultural fields, and flooded croplands. CWS and USFWS suggest landscapes characterized as “wetland mosaic” provide the most suitable migration stopover habitat. This species is considered a very rare migrant and winter resident in Middle and East Tennessee.	species were two individuals that were observed approximately 15-20 miles southwest of Alternative C in November 2023. No individuals were observed during the field survey.
Clams and Fish				
Rabbitsfoot (*Quadrula cylindrica cylindrica*)	FT	A, B, C	This species occurs in large creeks and rivers with moderate current over sandy gravel or sandy clay substrate. This species is known to reside in the Cumberland River Basin.	***Alternative A*****:** May occur. The Proposed Action site contains a medium-sized stream that may provide suitable habitat for this species. No individuals were observed during the field survey. ***Alternatives B and C*****:** Unlikely to occur. The Proposed Action sites did not contain suitable aquatic habitat for this species. No individuals were observed during the field survey.
Redlips Darter (*Etheostoma maydeni*)	SP	A only	Found in slow-moving large creeks and rivers in pools along the banks strewn with boulders and woody debris.	May occur. Spring Creek within the Proposed Action site contains potential suitable habitat for this species, including woody debris and slow-moving water.
Insects				
Monarch Butterfly (*Danaus plexippus*)	PT	A, B, C	Overwinter in the mature oyamel fir forests in the mountains of central Mexico. In March, they travel to the northern United States and Canada. Pine, fir, and	Unlikely to occur. No common milkweed (*Asclepias syriaca*) was observed within the Proposed Action site; however, the Proposed Action site falls within the species’ summer migration corridor. No individual monarchs were observed during the field

			cedar trees are often chosen for roosting. During the breeding season, they are typically found in open grassy areas, laying their eggs exclusively on the milkweed plant. Milkweed plants can be found in a wide range of habitats, including, but not limited to, prairies, fields, open woodlands, and roadsides.	survey. Areas surrounding the Proposed Action sites are predominantly developed.
Mammals				
Gray Bat (*Myotis grisescens*)	FE	A, B, C	Gray bats occupy caves or cave-like structures year-round. While gray bats prefer caves, summer colonies have been documented using dams, mines, quarries, concrete box culverts, and the undersides of bridges. Summer caves must be warm or have restricted rooms that can trap the body heat of clustered bats.	Unlikely to Occur. No caves or sinkholes were identified within the Proposed Action sites. There are no known occurrences of this species within the 8-digit HUC code for the Proposed Action sites.
Indiana Bat (*Myotis sodalist*)	FE	A, B, C	Indiana bats forage and roost in a variety of forested habitats in the eastern United States. Indiana bats roost under exfoliating bark or within cracks of trees with a minimum diameter-at-breast height (DBH) of 5 inches; solar exposure is also required, especially for maternity roosts. Roost trees are typically within forests, but individual or loose aggregates of trees may also be	***Alternative A and C*:** May occur. Potential habitat (foraging and roosting) was identified. ***Alternative B*:** Unlikely to occur. No suitable forested habitat was observed within the Proposed Action site.

			used for roosts when in proximity (1,000 feet) to larger forested areas. In winter, Indiana bats hibernate in caves and mines. They are highly concentrated during hibernation, with 72% of the population hibernating in just four sites in Missouri, Indiana and Illinois.	
Little Brown Bat (*Myotis lucifugus*)	SP	C only	This species often uses human-made structures for resting and maternity sites, as well as caves and hollow trees. These bats typically feed over water.	May occur. There is a known occurrence of this species within the 8-digit HUC code for the Proposed Action site. Potential habitat (foraging and roosting) was identified in the Proposed Action site.
Northern Long-eared Bat (*Myotis septentrionalis*)	FE	A, B, C	This species uses forested areas for roosting, foraging, and commuting between summer and winter habitat. Preferred habitat includes areas with a dense growth of trees and underbrush covering a large tract and a natural chamber or series of chambers in the earth or on the side of a hill or cliff. In winter, individuals hibernate in caves and abandoned mines, often with other species of bats.	***Alternative A and C*****:** May occur. Suitable habitat was observed within the Proposed Action sites in the form of snags, exfoliated tree bark, and travel corridors that could provide potential roosting and foraging habitat. No caves or sinkholes were identified at any of the three sites. There are no known occurrences of this species within the 8-digit HUC code for the Proposed Action sites. ***Alternative B*****:** Unlikely to occur. No suitable forested habitat was observed within the Proposed Action site. No caves or sinkholes were identified within the Proposed Action site. There are no known occurrences within the 8-digit HUC code for the Proposed Action site.
Tri-colored Bat (*Perimyotis subflavus*)	PE	A, B, C	This species occupies a wide variety of habitats, including caves, mines, and rock crevices during the winter and small caves, hollow trees, under tree	***Alternative A*****:** May occur. The Proposed Action site contains snags, trees with clustered leaf arrangements (i.e.: Acer saccaharum and Liriodendron tulipifera), exfoliated tree bark, and travel corridors that could provide potential roosting

			bark, brush piles, mid- to upper canopy leaf clusters, buildings, culverts, and artificial roosting boxes during non-winter months.	and foraging habitat. No caves or sinkholes were identified within the Proposed Action site. ***Alternative B*****:** Unlikely to occur. The Proposed Action site does not contain continuous suitable habitat for this species. Additionally, there are no known occurrences of this species within the 8-digit HUC code for Proposed Action site. No caves or sinkholes were identified within the Proposed Action site. ***Alternative C***: May occur. The Proposed Action site contains snags, trees with clustered leaf arrangements, exfoliated tree bark, and potential travel corridors that could provide roosting and foraging habitat. No caves or sinkholes were identified within the Proposed Action site. There is a known occurrence of this species within the 8-digit HUC code for the Proposed Action site.
Plants				
Short's Bladderpod (*Physaria globosa*)	FE, SP	A, B, C	This species prefers dry, open limestone ledges on river bluffs, talus of lower bluff slopes, and shale at cliff bases. This species can be found on rocky slopes and the tops, ledges, or bases of steep cliffs along major waterways such as the Cumberland River. They may also be present on thin, calcareous soils in cedar glades. This species has also been observed on roadcuts downhill from natural or semi-natural bluffs.	Unlikely to occur. This species is likely to occur on open limestone ledges on river bluffs and in cedar glades that are not present within the Proposed Action sites. No individuals were observed during field survey.

Price's Potato-bean (*Apios priceana*)	FT	A, B, C	This species typically occurs in open woods and along wood edges in limestone areas. Some populations have also been observed growing along highway rights-of-way and powerline corridors. This species prefers soils that are well-drained loams on old alluvium or over limestone.	***Alternative A*:** Unlikely to occur. The Proposed Action site contains open woods that may provide suitable habitat for this species. A USFWS protocol-level survey was completed in July 2025. No individuals were observed during the field survey. ***Alternative B and C*:** Unlikely to occur. No suitable habitat was observed within the Proposed Action sites. Additionally, no individuals were observed during the field survey.
White Water-buttercup (*Ranunculus aquatilis var. diffuses*)	SP	B only	This species is an aquatic perennial herb that can be found in bays, marshes, ponds, and stagnant water.	Unlikely to occur. There is suitable habitat present in the Proposed Action site. However, this area is heavily disturbed due to agricultural activities and is not likely to support this species. No individuals were observed during the field survey. Therefore, potential occurrence of this species is low.
Federal Status: BGEPA = Bald Eagle Protection Act, EPNE = Experimental Population, Non-Essential, FE = Federal Endangered, FT = Federal Threatened, PE = Proposed Endangered; Tennessee State Status: SP = State Protected				

3.6.2 Environmental Consequences

Incidental mortality or displacement of individual birds protected under the MBTA is not expected to occur due to construction disturbance (e.g., vegetation removal, noise) associated with each alternative. Mobile individuals (e.g., adults) would be expected to move to adjacent habitats in response to habitat loss or disturbance. In advance of any proposed tree clearing during nesting season, the private entity would be required to conduct a pre-construction clearance survey to determine the presence/absence of nesting MBTA birds, and coordinate with USFWS to determine the potential need for non-disturbance buffers or other mitigation. The private entity would be responsible for implementing any buffers or mitigation measures required by USFWS. Nesting seasons for species where suitable habitat was identified at each alternative site are March 1 to September 10 for Alternative A, March 15 to September 10 for Alternative B, and March 1 to September 10 for Alternative C.

VA's effect determinations for Special Status Species are shown in Table 3-3 and are based upon habitat requirements, site conditions, and plans for site development under each Alternative.

3.6.2.1 Sub-Alternatives A1 and A2

Based upon IPaC submissions and the standing analysis completed by USFWS, VA determined the Proposed Action under Sub-Alternatives A1 and A2 meets the criteria for a *may affect, not likely to adversely affect* determination for the Indiana Bat, Northern Long-eared Bat, and Tri-colored Bat. Spring Creek, within the Proposed Action site for Sub-Alternatives A1 and A2, contains potential suitable habitat for Rabbitsfoot and the Redlips Darter, including woody debris and slow-moving water; however, site plans do not indicate impacts to Spring Creek. Therefore, impacts to these species are not anticipated.

Through the implementation of conservation measures and BMPs recommended by USFWS, Sub-Alternatives A1 and A2 are not likely to adversely affect Indiana Bats, Northern Long-eared Bats, and Tri-colored Bats.

Indiana Bat

The USFWS provides conservation measures to reduce potential impacts to the Indiana Bat, which will include the following time-of-year restriction:

- Limit tree clearing to the USFWS-recommended clearing period, outside of the species summer occupancy season (April 1 to September 30).

The USFWS further provides the following BMP recommendations to reduce potential impacts to the Indiana Bat:

- Maintain a 150-foot buffer around known or potential roost trees during the summer occupancy season.
- Minimize disturbance in foraging and commuting corridors, especially near water bodies and riparian zones.
- Design construction lighting to reduce glare and minimize nighttime illumination near known bat habitats.

Northern Long-eared Bat

The USFWS provides conservation measures to reduce potential impacts to the Northern Long-eared Bat, which will include the following time-of-year restriction:

- Limit tree clearing to the USFWS-recommended clearing period, outside of the species' pup season (May 15 to July 31).

The USFWS further provides the following BMP recommendations to reduce potential impacts to the Northern Long-eared Bat:

- Limit tree clearing to the extent possible.

- Minimize lighting and maintain forested corridors to preserve habitat connectivity.
- Reduce nighttime lighting and noise/vibration impacts near roost habitat during the active pup season.

Tri-colored Bat

The USFWS provides conservation measures to reduce potential impacts to the Tri-colored Bat, which will include the following time-of-year restriction:

- Limit tree clearing to the USFWS-recommended clearing period, outside of the species' pup season (May 15 to July 31).

The USFWS further provides the following BMP recommendations to reduce potential impacts to the Tri-colored Bat:

- Minimize fragmentation of forested habitat and maintain travel corridors between foraging and roosting sites.
- Reduce nighttime lighting and noise/vibration impacts near roost habitat during the active pup season.

The USFWS Official Species List, Determination Key results, and letter recording VA's determination of effect for the Proposed Action under Alternative A are provided in Appendix B. A project review request was submitted to the USFWS Tennessee Ecological Field Office on October 1, 2025, for Alternative A to obtain concurrence with the effect determinations (*may affect, not likely to adversely affect*) for the Indiana Bat, Northern Long-eared Bat and Tri-colored Bat. USFWS correspondence and concurrence of VA's determinations, as shown in Table 3-3, will be provided in Appendix B of the Final EA.

3.6.2.2 Alternative B

Based upon desktop analysis and field verification surveys, VA determined that no special-status species have potential to occur within the Alternative B site. Through IPaC submissions and the standing analysis completed by USFWS, VA further determined the Proposed Action under Alternative B meets the criteria for *no effect* for special status species as indicated in Table 3-3. The USFWS Official Species List, Determination Key results, and letter recording VA's determination of effect for the Proposed Action under B are provided in Appendix B.

3.6.2.3 Alternative C

Based upon IPaC submissions and the standing analysis completed by USFWS, VA determined the Proposed Action under Alternative C meets the criteria for a *may affect, not likely to adversely affect* determination for the Indiana Bat, Northern Long-eared Bat, and Tri-colored Bat. VA further determined that Alternative C meets the criteria for a may affect, not likely to adversely affect determination for the State-protected Little Brown Bat.

Through the implementation of conservation measures and BMPs recommended by USFWS, Alternative C is not likely to adversely affect Indiana Bats, Northern Long-eared Bats, and Tri-colored Bats. VA has proposed similar conservations measures and BMPs for implementation to avoid adverse impacts to the State-protected Little Brown Bat.

Indiana Bat

The USFWS provides conservation measures to reduce potential impacts to the Indiana Bat, which will include the following time-of-year restriction:

- Limit tree clearing to the USFWS-recommended clearing period, outside of the species summer occupancy season (April 1 to September 30).

The USFWS further provides the following BMP recommendations to reduce potential impacts to the Indiana Bat:

- Maintain a 150-foot buffer around known or potential roost trees during the summer occupancy season.
- Minimize disturbance in foraging and commuting corridors, especially near water bodies and riparian zones.
- Design construction lighting to reduce glare and minimize nighttime illumination near known bat habitats.

Northern Long-eared Bat

The USFWS provides conservation measures to reduce potential impacts to the Northern Long-eared Bat, which will include the following time-of-year restriction:

- Limit tree clearing to the USFWS-recommended clearing period, outside of the species' pup season (May 15 to July 31).

The USFWS further provides the following BMP recommendations to reduce potential impacts to the Northern Long-eared Bat:

- Limit tree clearing to the extent possible.
- Minimize lighting and maintain forested corridors to preserve habitat connectivity.
- Reduce nighttime lighting and noise/vibration impacts near roost habitat during the active pup season.

Tri-colored Bat

The USFWS provides conservation measures to reduce potential impacts to the Tri-colored Bat, which will include the following time-of-year restriction:

- Limit tree clearing to the USFWS-recommended clearing period, outside of the species' pup season (May 15 to July 31).

The USFWS further provides the following BMP recommendations to reduce potential impacts to the Tri-colored Bat:

- Minimize fragmentation of forested habitat and maintain travel corridors between foraging and roosting sites.
- Reduce nighttime lighting and noise/vibration impacts near roost habitat during the active pup season.

Little Brown Bat

- To reduce potential impacts to the Little Brown Bat, the private entity would limit tree clearing for the Project to avoid the species' summer maternity season (April 1 to October 15).

The USFWS Official Species List, Determination Key results, and letter recording VA's determination of effect for the Proposed Action under Alternative C, are provided in Appendix B. A project review request was submitted to the USFWS Tennessee Ecological Field Office on October 1, 2025, for Alternative C to obtain concurrence with the effect determinations (*may affect, not likely to adversely affect*) for the Indiana Bat, Northern Long-eared Bat, and Tri-colored Bat. USFWS correspondence and concurrence of VA's determinations, as shown in Table 3-3, will be provided in Appendix B of the Final EA.

VA additionally submitted a project review request to the Tennessee Wildlife Resources Agency (TWRA), Region 2 Office on September 26, 2025, for Alternative C to obtain concurrence with the effect determination (*may affect, not likely to adversely affect*) for the Little Brown Bat (Appendix B). TWRA concurrence of VA's determination was received on October 14, 2025. TWRA correspondence and concurrence of VA's determinations, as shown in Table 3-3, are provided in Appendix B.

Under all Alternatives, no adverse effects to designated habitat or listed species are anticipated with implementation of conservation measures and BMPs, resulting in less than significant impacts to wildlife and habitat.

Table 3-3. Effect Determinations for Special Status Species

Common Name (Scientific Name)	Status	Alternative Site	Effect Determination
Eastern Hellbender (*Cryptobranchus alleganiensis alleganiensis*)	SP	C only	No effect
Bald Eagle (*Haliaeetus leucocephalus*)	BGEPA, MBTA, SP	A, B, C	Unlikely to cause a take
Whooping Crane (*Grus americana*)	EPNE	A, B, C	No effect
Rabbitsfoot (*Quadrula cylindrica cylindrica*)	FT	A, B, C	No effect
Redlips Darter (*Etheostoma maydeni*)	SP	A only	No effect
Monarch Butterfly (*Danaus plexippus*)	PT	A, B, C	No effect
Gray Bat (*Myotis grisescens*)	FE	A, B, C	No effect
Indiana Bat (*Myotis sodalist*)	FE	A, B, C	*Alternative A and C:* May affect, not likely to adversely affect *Alternative B*: No effect
Little Brown Bat (*Myotis lucifugus*)	SP	C only	May affect, not likely to adversely affect
Northern Long-eared Bat (*Myotis septentrionalis*)	FE	A, B, C	*Alternative A and C:* May affect, not likely to adversely affect *Alternative B*: No effect
Tri-colored Bat (*Perimyotis subflavus*)	PE	A, B, C	*Alternative A and C:* May affect, not likely to adversely affect *Alternative B*: No effect
Short's Bladderpod (*Physaria globosa*)	FE, SP	A, B, C	No effect

Price's Potato-bean (*Apios priceana*)	FT	A, B, C	No effect
White Water-buttercup (*Ranunculus aquatilis var. diffuses*)	SP	B only	No effect
Federal Status: BGEPA = Bald Eagle Protection Act, EPNE = Experimental Population, Non-Essential, FE = Federal Endangered, FT = Federal Threatened, PE = Proposed Endangered; Tennessee State Status: SP = State Protected			

3.6.2.4 No Action Alternative

Under the No Action Alternative, the OPC would not be constructed or operated. There would be no impacts related to wildlife or habitat associated with the No Action Alternative.

3.7 Noise

High noise levels that occur over a long duration can impact the health of exposed populations and be a nuisance to the surrounding community. This EA analyzes noise from potential construction and demolition activities using the A-weighted decibel scale (dBA), which is a logarithmic scale generally used to measure noise levels because it can account for the sensitivity of the human ear across the frequency spectrum.

The Noise Control Act of 1972, with its subsequent amendments (Quiet Communities Act of 1978, 42 U.S.C. § 4901-4918), delegates to the States the authority to regulate environmental noise and directs government agencies to comply with local community noise statutes and regulations. Section 10-303 of the Clarksville, Tennessee Code of Ordinances prohibits offending sound from commercial uses between the hours of 6:00 a.m. and midnight at 80 dB(A) and midnight to 6:00 a.m. at 75 dB(A), and impulsive sound between the hours of 6:00 a.m. and midnight at 80 dB(A) and midnight to 6:00 a.m. at 80 dB(A).

Section 10-308 exempts excavation, construction, demolition, repair, paving, or alteration of buildings or streets. The exemption of these activities does not apply if they occur in a residential use area between the hours of 7:00 p.m. and 7:00 a.m. Monday through Friday and 6:00 p.m. and 9:00 a.m. on Saturday and Sunday except in case of urgent necessity in the interest of public health and safety.

3.7.1 Affected Environment

3.7.1.1 Alternative A

The primary noise sources in the vicinity of the Alternative A site are the intermediate to heavy traffic from US-79 and Interstate 24 on the site's southern and western sides, respectively.

Sensitive noise receptors in the vicinity of the proposed site include the Waterford Landing Apartments and multiple hotels adjacent east of the site, and the Chalet Hills residential area west of the site. Based on these receptors, the Section 10-308 exemption may not apply.

3.7.1.2 Alternative B

The primary noise sources in the vicinity of the Alternative B site are the intermediate to heavy traffic on Interstate 24 and the surrounding four-lane roads, Ted Crozier Sr. Boulevard and Dunlop Lane.

Sensitive noise receptors in the vicinity of the proposed site include the Tennova Healthcare - Clarksville hospital adjacent east and a residential area further southeast of the site.

3.7.1.3 Alternative C

The primary noise sources in the vicinity of the Alternative C site include Highway 76 to the east and Richview Road to the west of the proposed site.

Sensitive noise receptors in the vicinity of the proposed site include Clarksville High School and Richview Middle School adjacent west, a residential community to the north, and a senior assisted living facility to the east. Based on these receptors, the Section 10-308 exemption may not apply.

3.7.2 Environmental Consequences

3.7.2.1 Sub-Alternatives A1 and A2, Alternative B, and Alternative C

The Proposed Action under each alternative would be expected to have minor, short-term and negligible, long-term, adverse effects on sensitive noise receptors.

Construction activities associated with the Proposed Action would result in minor, short-term, adverse effects. Construction-related noise would vary throughout the construction process and depend on the quantity and type of equipment and tools being used, as well as operating schedules. Construction activities would be typical of construction projects of this scale and would include transport, site preparation, excavation, placement of foundations, and paving. The greatest source of noise would be construction equipment utilizing internal combustion engines, including, but not limited to, excavators, front-end loaders, bulldozers, dump trucks, utility trucks, and forklifts. Broadband, self-adjusting backup alarms in lieu of backup-beepers consistent with applicable safety requirements would be utilized.

Operation of the OPC would have less than significant noise impacts. Operational noise sources would include vehicle traffic; heating, ventilation, and air conditioning systems; and landscape maintenance activities such as lawn mowers and leaf blowers. These noises would be consistent with medical facilities of similar size and would be consistent with ambient noise of the surrounding suburban area, resulting in less than significant impacts.

The private entity would be required to use every action and BMP practicable to minimize noise during construction of the Proposed Action through equipment controls and compliance with local noise ordinances.

3.7.2.2 No Action Alternative

Under the No Action Alternative, the OPC would not be constructed or operated. There would be no impacts related to noise associated with the No Action Alternative.

3.8 Land Use

3.8.1 Affected Environment

3.8.1.1 Alternative A

The Alternative A site is undeveloped, wooded land with a creek that bisects its north-central portion and smaller tributaries of the creek that bisect its north and south ends. The site has remained undeveloped since 1946, with the land surrounding it remaining undeveloped from then until the late 20th Century. It is bordered to the east by multifamily residential buildings, a small cemetery, and four separate hotels, and to the southeast by a Walmart Superstore. The rest of the surrounding area consists of undeveloped, wooded land.

The proposed site for Alternative A lies within three zoning districts, these being AG (Agricultural Production), C-2 (General Commercial), and R-4 (Multiple Family Residential), with a majority of the site within AG. Zoning for Alternative A can be seen in the zoning map (Figure 3-2).

3.8.1.2 Alternative B

The Alternative B site consists of a developed agricultural field with concrete pads left from previously existing buildings and a gravel drive. The site was developed in the late 1940s for conjoining residential and agricultural business use. Agricultural structures existed on the site, which were demolished between 2021 and 2022. Most of the land surrounding the site has remained agricultural since its development in the 1940s. The site is bordered by agricultural fields to the north, Ted Crozier Sr. Boulevard and agricultural fields to the west, medical buildings to the east and south, and Dunlop Lane to the south. To the north there is undeveloped land and a railroad line.

The proposed site for Alternative B lies within zoning district C-5 (Highway Arterial Commercial) and C-2. Zoning for Alternative B can be seen in the zoning map (Figure 3-2).

3.8.1.3 Alternative C

The Alternative C site consists of woodlands, pasture, and open space. The site is bordered by commercial property and Rufus Johnson Boulevard and Highway 76 to the south, senior living facilities to the east, a high school complex and road to the west, and single-family homes to the north. Public water can be found near the site, with a water tower adjacent to the site and fire hydrants installed near the site.

The proposed site for Alternative C lies within zoning district C-5 and O-1 (Office District). Zoning for Alternative C can be seen in the zoning map (Figure 3-2).

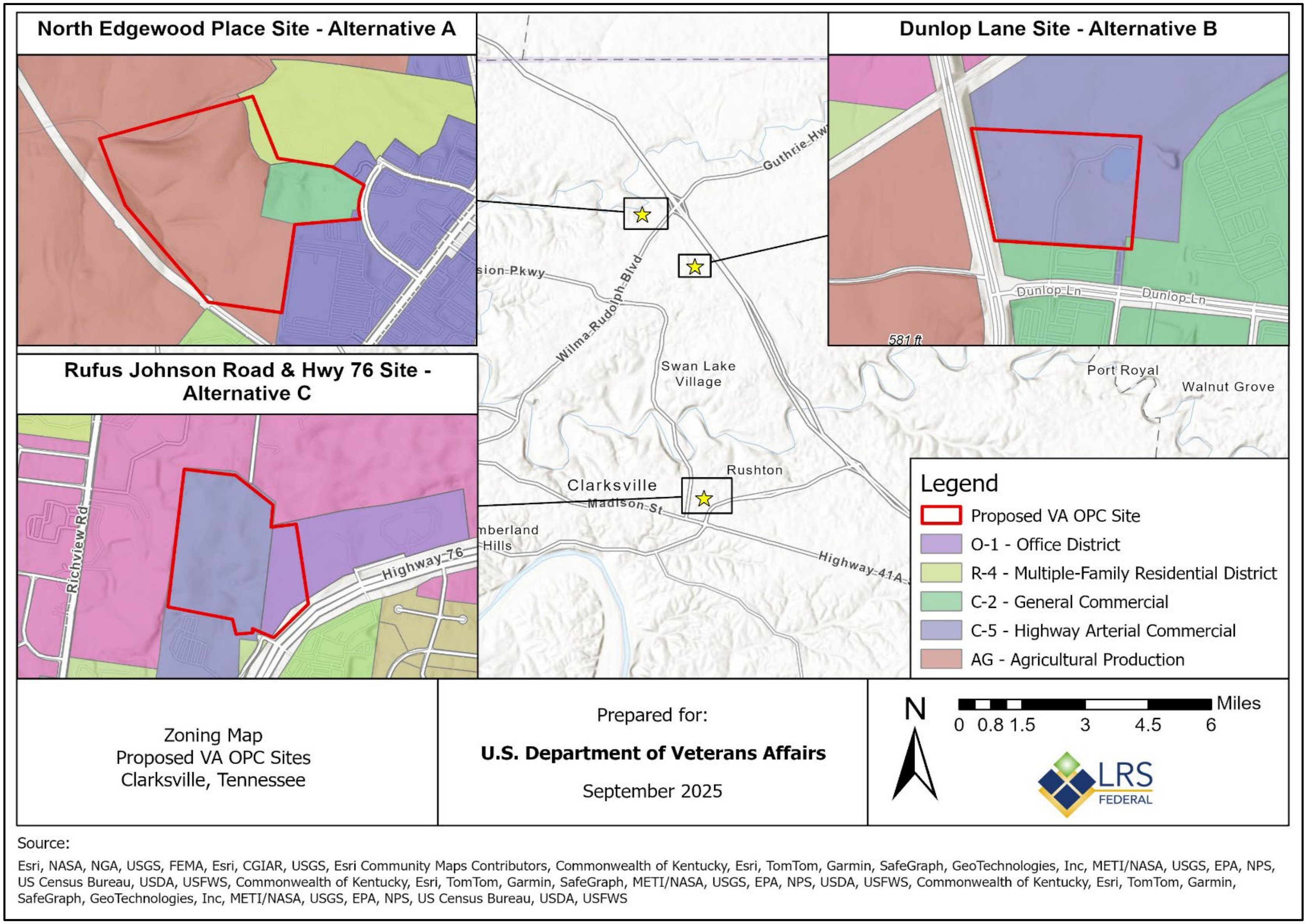


Figure 3-2. Clarksville, Tennessee Zoning Map

3.8.2 Environmental Consequences

3.8.2.1 Sub-Alternatives A1 and A2

Construction of the Proposed Action may have an impact on land use. According to the Clarksville-Montgomery County Regional Planning Commission, the proposed site for Alternative A is within zoning designations AG, or Agricultural Production; C-2, or General Commercial; and R-4, or Multiple Family Residential. Zone AG, which constitutes the majority of the site, is defined by the City of Clarksville as to be used to provide for the proper utilization of those lands best suited for the production of agricultural products such as field crops, livestock, and other conventional agricultural activities, and is also appropriate within environmentally sensitive areas such as floodplains and steep slopes. Governmental operations are permitted in Zone AG. Zone C-2 is defined by the City of Clarksville as to be used for personal and business services, general and professional offices, multiple family dwellings (including apartments and townhouses) and general retail business. Most medical uses and governmental operations are permitted within Zone C-2. Zone R-4 is intended to provide high density multiple-family dwellings and facilities in urban residence areas that are close to mass transit, retail services, and/or employment opportunities.

Re-zoning of the proposed site would be necessary, which would require consultation with the Clarksville-Montgomery County Regional Planning Commission.

3.8.2.2 Alternative B

Construction of the Proposed Action may have an impact on land use. According to the Clarksville-Montgomery County Regional Planning Commission, the proposed site for Alternative B is within zoning designation C-5, or Highway Arterial Commercial, and C-2. The City of Clarksville defined Zone C-5 as to be used to provide areas in which the principal use of land is devoted to commercial establishments which cater specifically to motor vehicle-oriented trade.

Re-zoning of the proposed site may be necessary, which would require consultation with the Clarksville-Montgomery County Regional Planning Commission.

3.8.2.3 Alternative C

Construction of the Proposed Action may have an impact on land use. According to the Clarksville-Montgomery County Regional Planning Commission, the proposed site for Alternative C is within zoning designation C-5, or Highway Arterial Commercial, and O-1, or Office District. The City of Clarksville defined zone C-5 as to be used to provide areas in which the principal use of land is devoted to commercial establishments which cater specifically to motor vehicle-oriented trade. The purpose of the O-1 district is to provide areas for general, professional and business offices and related activities.

Re-zoning of the proposed site may be necessary, which would require consultation with the Clarksville-Montgomery County Regional Planning Commission.

Under all Alternatives, any land use changes would result in less than significant impacts on land use.

3.8.2.4 No Action Alternative

Under the No Action Alternative, the OPC would not be constructed or operated. No impacts to land use would occur as a result of VA's actions.

3.9 Floodplains and Wetlands

3.9.1 Affected Environment

3.9.1.1 Floodplains

For development that occurs within a Special Flood Hazard Area (SFHA), a Permit for Floodplain Development is required to ensure that proposed development projects meet the standards of the National Flood Insurance Program (NFIP) and the community's floodplain management ordinance.

Each alternative site is predominantly located in a low-risk area for flooding, as the elevations for the sites range from 450 to 550 feet amsl.

Alternative A

Approximately 4.43 acres of the Proposed Action site is within a SFHA designated as Zone A, which is defined as a high-risk flood zone area with mandatory flood insurance purchase requirements and floodplain management standards. This Zone A is found in the northwest portion of the proposed site as a result of Spring Creek, which runs through the property. The remainder of the site is designated as Zone X, or area of minimal flood risk. All surrounding areas are also located in Zone X (Figure 3-3).

Alternatives B and C

The Alternative B and C sites are not within a SFHA. Both sites are designated as Zone X, or area of minimal flood risk. All surrounding areas for both sites are also located in Zone X. The Alternative B site is located approximately 1.3 miles southeast of the nearest Zone A area. The Alternative C site is more than 0.5 miles from a Zone AE area, the Red River (Figure 3-3).

3.9.1.2 Wetlands and Other Resources

Jurisdictional Waters of the United States (WOTUS), including wetlands with a continuous surface connection to waters, are defined by 33 CFR 328.3 and are protected by Section 404 of the CWA (33 U.S.C. 1344), which is administered and enforced by the U.S. Army Corps of Engineers (USACE). Permit type is determined by the quantity of affected WOTUS, size of the project, and the type of project. If impacts are anticipated within the Proposed Action area to WOTUS, a Nationwide Permit (NWP) may be required, which authorizes impacts for projects intended for commercial and institutional uses. This permit allows up to 0.5 acres of loss of WOTUS, including wetlands. Compensatory mitigation may be required if impacts are greater than 0.1 acres to ensure no net loss of aquatic resources. Impacts exceeding 0.5 acres will require an Individual Permit (IP) from USACE and mitigation to offset impacts.

In Tennessee, an Aquatic Resource Alteration Permit (ARAP) is required to carry out any activity which results in the alteration of the physical, chemical, radiological, biological, or bacteriological properties of any WOTS, including wetlands, regardless of federal jurisdiction. The Tennessee Water Quality Control Act of 1977 defines WOTS as "any and all water, public or private, on or beneath the surface of the ground, that are contained within, flow through, or border upon Tennessee or any portion thereof, except those bodies of water confined to and retained within the limits of private property in single ownership that do not combine or affect a junction with a natural surface or underground waters" (Tennessee Code Annotated [T.C.A.] Section 69-3-103(45)). The ARAP serves as the required Section 401 certification under the CWA.

The TDEC CGP required for construction activities disturbing over an acre has buffer requirements that must be incorporated into the SWPPP and implemented during construction. According to the TDEC Erosion and Sediment Control Handbook, for sites that contain and/or are adjacent to a receiving stream designated as impaired or Exceptional Tennessee Waters, a 60-foot natural riparian buffer zone adjacent to the receiving stream shall be preserved, to the maximum extent practicable, during construction activities at the site. The Handbook also requires a 30-foot natural riparian buffer zone adjacent to all streams during construction activities at the site. Every attempt should be made for construction activities not to take place within the buffer zone; however, BMPs providing equivalent protection to a receiving stream as a natural riparian zone may be used at a construction site. These buffer zone requirements do not apply to an area that is being altered under the authorization of a valid ARAP, or equivalent permits issued by federal authorities.

Additionally, Montgomery County's Water Quality Buffer Policy (Montgomery County, 2024) describes the permanent/post-construction buffer requirements, including an average buffer width of 30 feet (and a minimum of 15 feet) for wetlands, ponds, and lakes and an average buffer width of 60 feet (and a minimum of 30 feet) for Exceptional Tennessee Waters.

Field surveys of each of the three sites under Alternatives A, B, and C were conducted in October 2024 following the wetland delineation guidelines provided in both the *Corps of Engineers Wetlands Delineation Manual* (USACE 1987) and the subsequent *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Eastern Mountains and Piedmont Region, Version 2.0* (USACE, 2012) (SWCA, 2025).

Alternative A

According to the USFWS National Wetland Inventory (NWI) database, a portion of Spring Creek and an unnamed riverine off-shoot of the creek intersect the site. The West Fork of the Red River, which runs Spring Creek's entrance to Billy Dunlop Park, is designated as Exceptional Tennessee Waters.

Four watercourses were delineated and determined to possess relatively permanent water flow and are considered potentially WOTUS and WOTS. There is additionally a Freshwater Forested/Shrub Wetland in the eastern portion of the site, as depicted in Figure 3-4. This wetland was delineated and classified as PEM. Due to its continuous surface connection to other WOTUS (Spring Creek), the PEM wetland is determined to be potentially jurisdictional under the CWA as a WOTUS. Additionally, the PEM wetland is likely to be considered a jurisdictional WOTS. Figure 3-4 depicts the delineated waters at the site.

Alternative B

The USFWS NWI database indicated the presence of potential wetlands (small freshwater ponds) located on the site.

One PFO wetland in the northwest corner of the site was delineated and was determined non-jurisdictional under the CWA and not a WOTUS due to the lack of another relatively permanent water to provide continuous surface connection. However, this PFO wetland is likely to be considered WOTS per Tennessee's definition since there is an ephemeral wet water conveyance potentially connecting the wetland to other natural surface waters. One open water feature in the northeast section was determined to be an artificial pond, used for water retention. This is non-jurisdictional under WOTUS and unlikely to be considered a jurisdictional WOTS per Tennessee's definition since it appears to be confined to the limits of private property in single ownership with no effect on natural surface or underground waters. Figure 3-5 depicts the delineated waters at the site.

Alternative C

According to the USFWS NWI database, there are two small freshwater ponds and a portion of a small Freshwater Forested/Shrub Wetland located on the site.

One PEM wetland, on the southeastern portion of the site, was delineated and was determined non-jurisdictional under the CWA and not a WOTUS due to the lack of another relatively permanent water to provide continuous surface connection. However, this PEM wetland is likely to be considered WOTS since it is hydrologically connected to groundwater. Three open water features were delineated and determined to be artificial ponds used for watering livestock and water retention. These features are also non-jurisdictional under WOTUS and unlikely to be a jurisdictional WOTS per Tennessee's definition since they appear to be confined to the limits of private property under single ownership with no effect on natural surface or underground waters. Figure 3-6 depicts the delineated waters at the site.

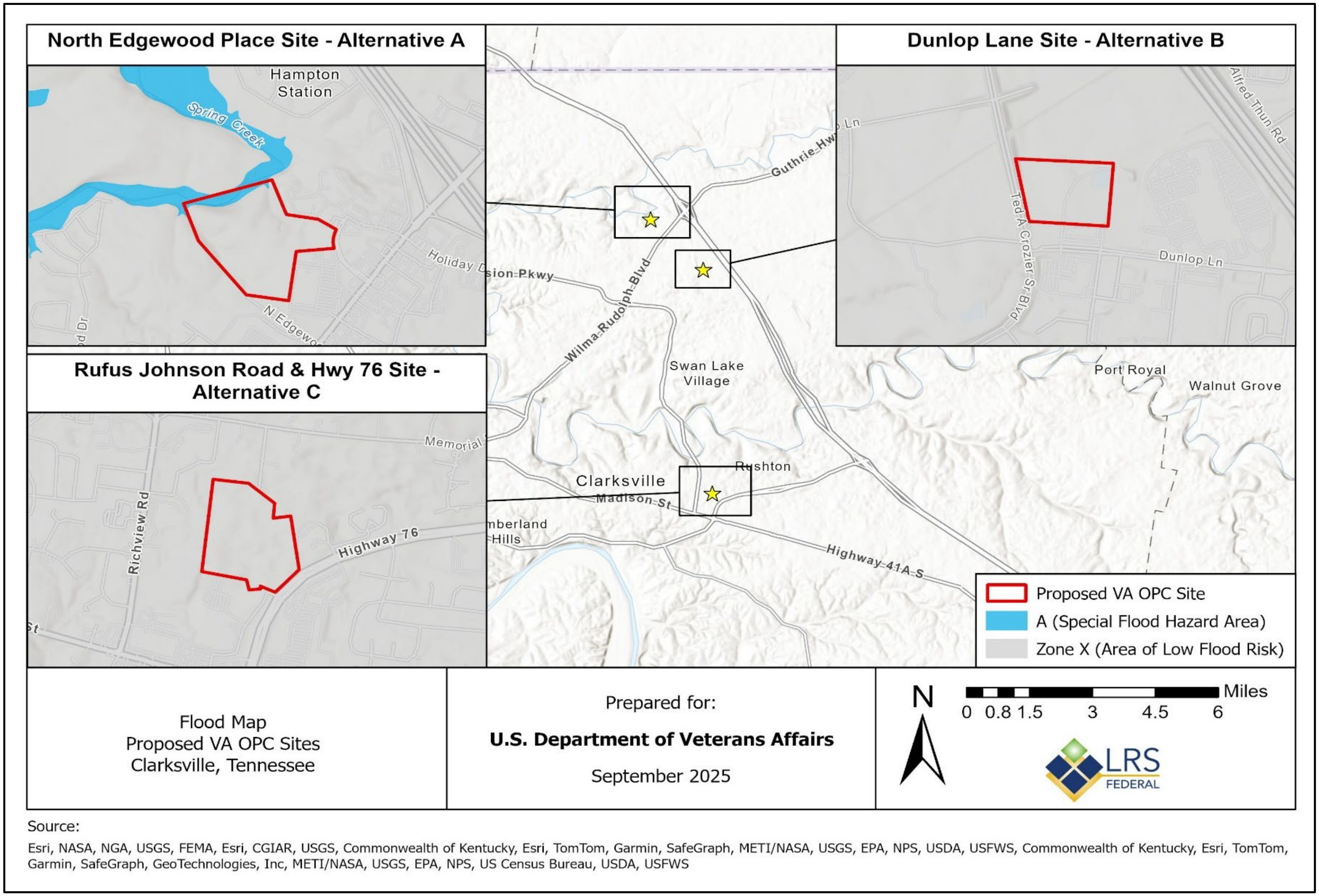


Figure 3-3. Floodplain Map – Alternatives A – C

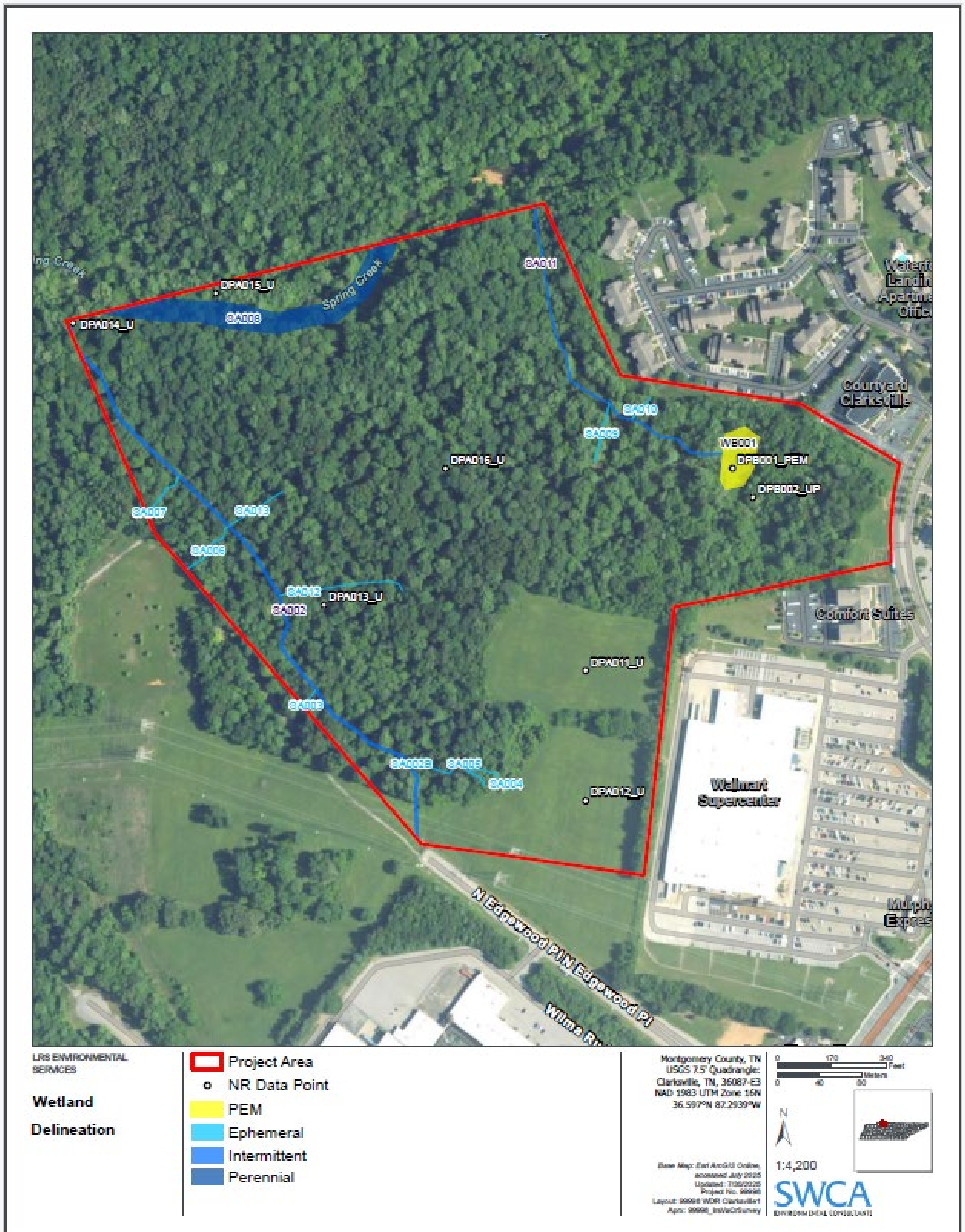


Figure 3-4. Delineated Water Features – Alternative A

Figure 3-5. Delineated Water Features – Alternative B

Figure 3-6. Delineated Water Features – Alternative C

3.9.2 Environmental Consequences

3.9.2.1 Alternative A

Sub-Alternative A1

Although approximately 4.43 acres of the Alternative A site is within a 100-year floodplain, Sub-Alternative A1 does not include any proposed development within the floodplain. Should the site configuration change to include development within the floodplain, the private entity would obtain a Montgomery County Floodplain Development Permit to ensure compliance with both community ordinances and NPIP standards. A permit would be required for any man-made changes within the SFHA (TDEC, 2018).

Based on the Sub-Alternative A1 site plan, impacts are proposed to the potentially jurisdictional WOTUS/WOTS PEM wetland delineated at the site. The site plan depicts a stormwater management facility/retention pond and storm sewer lines where the wetland is located. This would likely require dredging and vegetation removal during construction, though it would ultimately maintain or even expand the acreage of the wetland. Impacts to the potentially jurisdictional WOTUS/WOTS stream segment (SA011) are also proposed in this area. The driveway entrance at North Edgewood Place would impact potentially jurisdictional WOTUS/WOTS stream segments (SA002 and SA002B). If the site plan is not adjusted during the final design process to minimize WOTUS impacts, approximately 0.5 acres of potentially jurisdictional WOTUS would be impacted, which may require a CWA Section 404 IP from USACE. If the site plan is adjusted to minimize impacts to WOTUS, a CWA Section 404 NWP from USACE may be appropriate. USACE would make the final determination regarding jurisdictional WOTUS status and permitting requirements. WOTS impacts would require an ARAP from TDEC. Mitigation plans may be required to offset the permanent loss of WOTUS/WOTS, depending upon the total acreage of impacts.

Due to Spring Creek's connection to Exceptional Tennessee Waters, an average 60-foot (minimum 30-foot) water quality buffer, as measured from the top of stream bank, would apply during construction and be required to be maintained post construction. An average 30-foot (minimum 15-foot) buffer is required for all other WOTS during and post construction. If the final site design does not meet the water quality buffer requirements, the private entity would need to obtain permission from the Montgomery County Building Commissioner.

Sub-Alternative A2

Although approximately 4.43 acres of the Alternative A site is within a 100-year floodplain, Sub-Alternative A2 does not include any proposed development within the floodplain. Should the site configuration change to include development within the floodplain, the private entity would obtain a Montgomery County Floodplain Development Permit to ensure compliance with both community ordinances and NPIP standards. A permit is required for any man-made changes within the SFHA (TDEC, 2018).

Based on the Sub-Alternative A2 site plan, no impacts are proposed to the potentially jurisdictional WOTUS/WOTS PEM wetland delineated at the site. The driveway entrance at North Edgewood Place would impact potentially jurisdictional WOTUS/WOTS stream segments (SA002 and SA002B). If the site plan is not adjusted during the final design process to minimize WOTUS impacts, approximately 0.1 acres of potentially jurisdictional WOTUS would be impacted and a CWA Section 404 NWP from USACE may be required. USACE would make the final determination regarding jurisdictional WOTUS status and permitting requirements. WOTS impacts would require an ARAP from TDEC. Mitigation plans may be required to offset the permanent loss of WOTUS/WOTS, depending upon the total acreage of impacts.

Due to Spring Creek's connection to Exceptional Tennessee Waters, an average 60-foot (minimum 30-foot) water quality buffer, as measured from the top of stream bank, would apply during construction and be required to be maintained post construction. Buffer zone requirements would not be applicable to WOTS during construction if a valid ARAP is obtained; however, an average 30-foot (minimum 15-foot) buffer is required for all other WOTS following construction. The private entity would obtain permission from the Montgomery County Building Commissioner for any post-construction buffer zone requirements it is unable to implement.

3.9.2.2 Alternative B

There are no SFHAs designated at the Alternative B site and therefore, no significant impacts associated with flood zones as a result of the Proposed Action.

The site design for Alternative B proposes to construct over the artificial pond located on the northeast corner of the site. As previously stated, this open water pond is not considered jurisdictional WOTUS or WOTS. Therefore, fill and grading of the pond is not anticipated to require a permit from USACE or TDEC.

The site plan proposes to construct a stormwater retention pond where the PFO wetland was delineated on the northwest corner of the site. This would likely require dredging and vegetation removal during construction, though it would ultimately maintain or even expand the acreage of the wetland. The private entity would be required to obtain an ARAP from TDEC for impacts to the PEM wetland delineated at the site and identified as potentially jurisdictional WOTS.

An average 30-foot (minimum 15-foot) buffer is required for the wetland following construction. The site plan appears to meet the permanent buffer zone requirement around the retention pond, as currently designed. If the final site design does not meet the water quality buffer requirements, the private entity would need to obtain permission from the Montgomery County Building Commissioner.

3.9.2.3 Alternative C

There are no SFHAs designated at the Alternative C site and therefore, no significant impacts associated with flood zones as a result of the Proposed Action.

The site design for Alternative C proposes to construct over the three artificial ponds located at the site. As previously stated, these ponds are not considered jurisdictional WOTUS or WOTS. Therefore, filling and grading of the ponds is not anticipated to require a permit from USACE or TDEC.

The PEM wetland located on the southeastern portion of the site and identified as potentially jurisdictional WOTS would not be directly impacted by the proposed site design. A roadway (Veterans Way) would be constructed adjacent and west of the wetland. The developer would implement the required 30-foot average (15-foot minimum) riparian buffer zone around the wetland, if practicable. Otherwise, the private entity would be required to obtain an ARAP from TDEC. The average 30-foot post-construction buffer zone requirement for the wetland would be incorporated into the site design or permission would be requested from the Montgomery County Building Commissioner.

Under all Alternatives, no significant impacts to floodplains or wetlands are anticipated.

3.9.2.4 No Action Alternative

Under the No Action Alternative, the OPC would not be constructed or operated. There would be no impacts to floodplains or wetlands associated with the No Action Alternative.

3.10 Socioeconomics

Socioeconomics can be characterized as the demographics, employment, and income of a region. NEPA requires that Federal agencies "foster and promote the general welfare, to create and maintain conditions under which man and nature can exist in productive harmony, and fulfill the social, economic, and other requirements of present and future generations of Americans" (42 U.S.C. 4331(a)).

Executive Order 13045, *Protection of Children from Environmental Health Risks and Safety Risks* (1997), requires that each Federal agency "(a) shall make it a high priority to identify and assess environmental health risks and safety risks that may disproportionately affect children; and (b) shall ensure that its policies, programs, activities, and standards address disproportionate risks to children that result from environmental health risks or safety risks."

3.10.1 Affected Environment

3.10.1.1 Alternatives A, B, and C

U.S. Census Bureau data from the 2022 and 2023 American Community Survey 1-year estimates were used (U.S. Census Bureau, 2023). The State of Tennessee, Montgomery County, and the city of Clarksville were compared to better understand the demographics of the project site locations within the broader context of the region.

Clarksville has a higher minority and Hispanic population than Montgomery County and the State of Tennessee. Clarksville has a comparable Veteran population to Montgomery County and a higher Veteran population than the State of Tennessee (Table 3-4).

Table 3-4. Population and Veteran Status

Geographic Area	Population	Population Under 18 Years	Population 65 Years and Over	Minority	Hispanic	Veterans
Tennessee	7,126,489	21.9%	17.5%	27.7%	7.5%	7.1%
Montgomery County	239,872	26.6%	10.2%	37.4%	11.6%	18.2%
Clarksville	180,705	25.6%	9.7%	44.0%	14.7%	17.2%

The median household income in Clarksville is comparable to that in the State of Tennessee and lower than the median household income in Montgomery County (Table 3-5). The poverty rate and unemployment rate are higher in Clarksville than in the State of Tennessee and Montgomery County (U.S. Census Bureau, 2024).

Table 3-5. Income, Poverty, and Employment Status

Geographic Areas	Number of Households	Median Household Income	Poverty Status in the Past 12 Months	Unemployment Rate
Tennessee	2,889,226	$67,631	14%	4.0%
Montgomery County	91,893	$75,361	13.9%	5.4%
Clarksville	71,172	$67,246	16.1%	6.0%

There are no schools located within one mile of the Alternative A or Alternative B sites. Clarksville High School and Richview Middle School are located adjacent west and northwest, respectively, of the Alternative C site.

There are no parks located within one mile of Alternative A or Alternative B sites. Rotary Park is located approximately one mile south of the Alternative C site.

3.10.2 Environmental Consequences

3.10.2.1 Sub-Alternatives A1 and A2, Alternative B, and Alternative C

Construction associated with the Proposed Action would likely result in short-term, direct, and beneficial impacts to local employment and personal income. Construction would provide temporary construction jobs and could have short-term socioeconomic benefits to the immediate area and local economy. Long-term beneficial impacts associated with the Proposed Action include providing Veterans in the region with reasonable access to high-quality healthcare at a state-of-the-art OPC. The demand for medical staff at the clinic would also provide long-term employment benefits to the area.

Based on similar projects, there would not likely be impacts to child populations. The construction sites would be secured to prevent unauthorized access by children and others. BMPs would be implemented during construction to minimize and control construction noise and fugitive dust, which would minimize adverse impacts to child populations.

3.10.2.2 No Action Alternative

Under the No Action Alternative, the OPC would not be constructed or operated. There would be no impacts related to socioeconomics associated with the No Action Alternative.

3.11 Community Services

3.11.1 Affected Environment

3.11.1.1 Alternative A, B, and C

The Alternative A, B, and C sites are located in the Clarksville-Montgomery County School District. The closest school to the Alternative A site is Oakland Elementary School, located approximately 3.2 miles northeast of the site. The closest school to the Alternative B site is St. Bethlehem Elementary School, located approximately 1.8 miles southwest of the site. The closest schools to the Alternative C site are Clarksville High School and Richview Middle School, bordering the site on its west and northwest boundary.

The Alternative A, B, and C sites are served by the Clarksville Police Department and the Clarksville Fire & Rescue.

Tennova Healthcare – Clarksville, is the only hospital located near the alternative sites. The hospital is located adjacent to the Alternative B site on its east side, approximately 2.5 miles southeast of the Alternative A site, and approximately six miles north of the Alternative C site.

There are many parks located within Clarksville. Those nearest to the alternative sites are Billy Dunlop Park located approximately six miles west of the Alternative A site, Civitan Park located approximately 1.5 miles south of the Alternative B site, and Rotary Park located approximately one mile south of the Alternative C site.

Public transportation in Clarksville is provided by the Clarksville Transit System, a bus service that runs throughout the city.

3.11.2 Environmental Consequences

3.11.2.1 Sub-Alternatives A1 and A2, Alternative B, and Alternative C

The Proposed Action is not expected to place additional substantial demands on police, fire protection, or other emergency services in the area. The Proposed Action is not anticipated to have a significant impact on transportation service demands. Any short-term road closures during construction would be coordinated with the local emergency and transportation services in the area. Parks near the alternative sites would not be impacted by the Proposed Action. Therefore, impacts on community services are anticipated to be less than significant.

3.11.2.2 No Action Alternative

Under the No Action Alternative, the OPC would not be constructed or operated. There would be no impacts related to community services associated with the No Action Alternative.

3.12 Solid Waste and Hazardous Materials

The Resource Conservation and Recovery Act (RCRA) defines solid waste as, "any material that is discarded or disposed." Solid wastes become hazardous wastes when they exhibit a characteristic of ignitability, corrosivity, reactivity, or toxicity, or are otherwise listed specifically as a hazardous waste. Hazardous materials typically found in the built environment include, but are not limited to, materials containing asbestos, polychlorinated biphenyls (PCBs), lead, crystalline silica, and mercury. These materials often do not pose a hazard to human health or the environment under their intended uses but can have detrimental impacts when they are removed or disturbed.

3.12.1 Affected Environment

3.12.1.1 Alternative A

A Phase I Environmental Site Assessment (ESA) was conducted by Terracon Consultants, LLC on the Alternative A site in October 2023. No Recognized Environmental Conditions (RECs), controlled RECs, or historical RECs were found.

The Phase I ESA did not identify any features, activities, uses, and/or conditions indicating the presence or likely presence of hazardous substances or petroleum products at the subject property due to a release to the environment; likely release to the environment; or under conditions that pose a material threat of a future release to the environment.

3.12.1.2 Alternative B

A Phase I ESA was conducted by TTL, Inc. on the Alternative B site in August 2023. One REC and two Significant Data Gaps (SDGs) were found.

The Alternative B site was developed as a residential parcel with a connected agricultural business and pond in the 1940s. Structures associated with the agriculture business historically contained petroleum aboveground storage tanks (ASTs) and fertilizer storage bins and were demolished between 2021 and 2022. The previous existence and use of these ASTs and fertilizer storage bins on the proposed site was considered a REC due to observed poor housekeeping practices including discarded totes, piles of soil, and abandoned agricultural equipment, while the proposed site was being used as an agriculture business, leading TTL to conclude material threat of release on the site. Limited visibility created a lack of opportunity for TTL to observe the entirety of the site, creating an SDG. TTL also did not receive a response from the Clarksville Fire Rescue Department records request regarding incidents in relation to hazardous materials, fire, chemical usage or storage on the proposed site, creating an SDG.

A Limited Phase II ESA was conducted by TTL, Inc. on the former ASTs and fertilizer storage bin areas during September 2023. Soil samples were collected and analyzed for herbicides, pesticides, RCRA metals, volatile organic compounds, and Tennessee polycyclic aromatic hydrocarbons (TN-PAH). One herbicide, three RCRA metals, and sixteen TN-PAH constituents were detected among the soil samples collected. None of the reported concentrations exceeded the USEPA Region 4 Regional Screening Levels for Residential and Industrial Soils. Based on the results presented in the Limited Phase II ESA, adverse impacts from the evaluated constituents of concern are not present at concentrations exceeding regulatory thresholds and therefore do not pose a significant threat to human health or the environment. As such, the previously identified REC and SDGs were resolved. Therefore, the past use of the property as an agricultural business did not adversely impact the soil and groundwater on the subject property (TTL, 2023).

3.12.1.3 Alternative C

A Phase I ESA was conducted by McKay-Burchett & Company Engineers on the Alternative C site in October 2023. No RECs, controlled RECs, or historical RECs were found.

The Phase I ESA did not identify any features, activities, uses, and/or conditions indicating the presence or likely presence of hazardous substances or petroleum products at the subject property due to a release to the environment; likely release to the environment; or under conditions that pose a material threat of a future release to the environment.

3.12.2 Environmental Consequences

3.12.2.1 Sub-Alternatives A1 and A2, Alternative B, and Alternative C

Construction of the OPC would increase the presence and use of petroleum and hazardous materials and would result in short-term and minor impacts. The operation of construction equipment requires petroleum and hazardous materials such as oil, diesel, gasoline, hydraulic fluids, and lubricants. The use and presence of these substances could increase the potential risk for unintentional releases. BMPs such as proper storage and labeling of these substances in approved containers, storage of the containers on a level and impervious surface, and provision of a secondary containment system around fuel storage containers and during refueling activities would reduce the potential for unintentional releases.

Waste generated as part of construction activities under each alternative would be properly managed and disposed of according to the TDEC Division of Solid Waste Management (DSWM) regulations. If construction or demolition debris generated onsite is designated as hazardous waste, the DSWM

Hazardous Waste Management Permit would be required. Wastes would be collected and properly disposed of by a waste disposal company at an approved disposal facility.

Operation of the OPC would generate solid waste, hazardous materials, and medical waste. TDEC Rule 0400-12-01 requires any person owning or operating a new or existing facility that treats, stores, or disposes of hazardous waste to obtain a Hazardous Waste Management Permit. The DSWM considers medical wastes as special waste, which the OPC is likely to produce, and is generally prohibited from processing in solid waste disposal facilities. Solid Waste Rule 0400-11-01-.04(2)(k)4 states, however, that some specific medical wastes can be disposed of in a solid waste disposal facility after treatment to render them non-infectious.

Based on the Phase I ESAs, and previous and current uses of Alternative A and Alternative C sites, no contamination is known or suspected. Based on the Phase I ESA and subsequent Limited Phase II ESA for the Alternative B site, no contamination was identified at the site. The REC and SDGs identified during the Phase I ESA for the Alternative B site were resolved. If unforeseen and impacted soil or media is encountered during future earthwork that was not uncovered during previous Phase I and Phase II ESAs, the private entity would manage and dispose of contaminated material in accordance with applicable TDEC regulations. Construction and operation waste handling would additionally comply with all applicable TDEC requirements.

As a result, impacts related to solid waste and hazardous materials would be less than significant for all alternative and sub-alternative sites.

No Action Alternative

Under the No Action Alternative, the OPC would not be constructed or operated. There would be no impacts related to solid waste and hazardous materials associated with the No Action Alternative.

3.13 Traffic, Transportation, and Parking

Transportation systems include the vehicles and infrastructure necessary to convey people and goods from one location to another. This section focuses on traffic congestion for local roads and highways, which can affect the quality of life of employees and neighboring residents.

Transportation vehicles can emit greenhouse gases and regulated air pollutants such as carbon monoxide, nitrogen dioxide, and PM. Additionally, traffic congestion and idling on roads and highways can cause increased air pollution. Section 3.2 discusses the air quality impacts associated with mobile vehicle use.

3.13.1 Affected Environment

A Traffic Impact Study was completed for each Alternative (A, B, and C) site in October 2024 that analyzed the impacts collectively of the construction and operation of the proposed OPC (Jacobs, 2025). Individual traffic studies were not completed for Sub-Alternatives A1 and A2 because impacts were expected to be similar for each site plan. The study collected vehicular turning movement counts, conducted operational analyses for existing and future conditions, and simulated synchro network models to evaluate network operations for No-Build and Build scenarios. The study collected vehicular turning movement counts at major study intersections and projected background traffic growth according to the methodologies and guidance published by the Institute of Transportation Engineers *Trip Generation Manual*. The intent of the Traffic Impact Study was to provide a high-level traffic analysis based on intersection count data, estimated vehicles entering and leaving each site, and projected background growth to guide future decision making. The private entity would coordinate with local communities, Montgomery County Highway Department, and Tennessee Department of Transportation (TDOT) to determine if additional detailed traffic impact analysis would be required based upon design details.

Traffic operation performance at intersections is measured using several factors: average vehicle delay, volume to capacity ratio (v/c), and level of service (LOS). LOS is a categorization of the performance, ranging from A to F, which is related to the average vehicle delay, where LOS A represents minimal vehicle delay, LOS E represents an intersection operating at full capacity, and LOS F represents failing conditions with excessive delay.

3.13.1.1 Alternative A

Major roadways in the vicinity of the Alternative A site include:

- Wilma Rudolph Boulevard (US 79)
- I-24
- Kennedy Lane (N) aka Ted Crozier Sr. Blvd./ Holiday Drive (S)
- South Hampton Place
- Athletic Avenue

Under Sub-Alternative A1, the OPC would be accessed from two locations to the south along North Edgewood Place in addition to an entrance from Fair Brook Place to the north. Under Sub-Alternative A2, the OPC would be accessed by only two locations from the south at North Edgewood Place. To account for proposed access configurations from both the north and south under Sub-Alternatives A1 and A2, the following access configurations were used to model proposed site driveway intersections:

- Driveway 1: Wilma Rudolph Boulevard/North Edgewood Place (unsignalized)
- Driveway 2: Wilma Rudolph Boulevard/Fair Brook Place (signalized)

The current LOS is shown for each major intersection in the vicinity of the Alternative A site (Table 3-6). Currently, there are no intersections that have a failing LOS, and all intersections have an LOS rating of C or higher.

Table 3-6. Level of Service at Major Intersections Surrounding Alternative A

Intersection	LOS/Delay(s), Overall	
	a.m. Peak Hour	p.m. Peak Hour
Wilma Rudolph Blvd & S Hampton Place (Signalized)	A (5.7)	B (11.4)
Wilma Rudolph Blvd & N Edgewood Place (Two-way Stop-Controlled)	A (0.3)	C (24.6)
Wilma Rudolph Blvd & Westfield Ct/Holiday Drive (Signalized)	C (22.3)	C (33.4)
Wilma Rudolph Blvd & I-24 East Bound On-ramp/I-24 East Bound Off-ramp (Signalized)	B (17.9)	A (6.1)

Wilma Rudolph Blvd & I-24 West Bound On-ramp/I-24 West Bound Off-ramp (Signalized)	C (22.1)	C (22.2)
Wilma Rudolph Blvd & Fair Brook Place (Two-way Stop-controlled)	A (1.2)	A (9.4)
Wilma Rudolph Blvd & Athletic Avenue (Signalized)	A (8.6)	A (8.6)

3.13.1.2 Alternative B

Major roadways in the vicinity of the Alternative B site include:

- Ted Crozier Sr. Boulevard
- Dunlop Lane
- Wilma Rudolph Boulevard
- I-24
- Athletic Avenue
- Warfield Boulevard
- Chesapeake Lane
- International Boulevard

The following access configurations were used to model the proposed site driveway intersections:

- Driveway 1: Ted Crozier Boulevard/Athletic Avenue (signalized)
- Driveway 2: Chesapeake Lane/Dunlop Lane (signalized)

The current LOS is shown for each major intersection in the vicinity of the Alternative B site (Table 3-7). Currently, there is one intersection, Dunlop Lane & Ted Crozier Sr. Boulevard, which has a failing LOS during a.m. peak hour. All other intersections have an LOS rating of E or higher.

Table 3-7. Level of Service at Major Intersections Surrounding Alternative B

Intersection	LOS/Delay(s), Overall	
	a.m. Peak Hour	p.m. Peak Hour
Wilma Rudolph Blvd & Westfield Ct/Holiday Drive (Signalized)	C (22.3)	C (33.4)
Wilma Rudolph Blvd & I-24 East Bound On-ramp/I-24 East Bound Off-ramp (Signalized)	B (10.8)	B (10.0)

Wilma Rudolph Blvd & I-24 West Bound On-ramp/I-24 West Bound Off-ramp (Signalized)	C (22.1)	C (28.5)
Ted Crozier Sr. Blvd & Athletic Avenue-Site access (Signalized)	B (17.4)	C (32.3)
Dunlop Lane & Ted Crozier Sr. Blvd (Signalized)	C (34.2)	F (82.5)
Ted Crozier Sr. Blvd & Warfield Blvd (Signalized)	C (34.2)	D (41.6)
Dunlop Lane/Chesapeake Lane-Site Access (Two-way Stop-controlled)	A (1.2)	A (4.5)
International Blvd & Dunlop Lane (Signalized)	E (70.5)	D (53.1)

3.13.1.3 Alternative C

Major roads and roadways in the vicinity of the Alternative C site include:

- Memorial Drive
- Richview Road North (SR 374)
- Madison Street
- Highway 76 (MLK Jr. Parkway)
- Richaven Road

Proposed driveways accessing the site include:

- Driveway 1: Rufus Johnson Road at Highway 76 (MLK Jr. Parkway) (signalized)
- Driveway 2: Memorial Drive (single-lane roundabout)

The current LOS is shown for each major intersection in the vicinity of the Alternative C site (Table 3-8). Currently, there are no intersections that have a failing LOS, and all intersections have an LOS rating of E or higher.

Table 3-8. Level of Service at Major Intersections Surrounding Alternative C

Intersection	LOS/Delay(s), Overall	
	a.m. Peak Hour	p.m. Peak Hour
Richview Road & Memorial Drive (Signalized)	E (62.7)	E (70.7)

Highway 76 (MLK Jr. Parkway) & Rufus Johnson Road (Signalized)	A (2.0)	A (4.1)
Highway 76 (MLK Jr. Parkway) & Madison Street (Signalized)	D (44.4)	D (51.4)
Madison Street & Richview Road (Signalized)	D (49.4)	D (54.3)
Richaven Road & Memorial Drive (Two-way Stop-controlled)	A (0.2)	A (0.1)

3.13.2 Environmental Consequences

During construction activities, there would be an increase in construction vehicles that would likely contribute to a temporary increase in traffic volumes, minor congestion, and possibly detours for Alternatives A, B, and C. Impacts to traffic during construction would be temporary and localized and therefore, less than significant. Construction would be sequenced to the extent feasible to minimize impacts to traffic or transportation patterns.

Further coordination, planning, and traffic analysis, in conjunction with local communities, Montgomery County Highway Department, and TDOT would be required to develop any mitigation measures required to minimize impacts to traffic. Parking for the OPC would further be sized to handle the anticipated volume of cars expected to visit the facility on a daily basis.

3.13.2.1 Sub-Alternative A1 and A2

Based on the findings of the October 2024 Traffic Impact Study, the Build Scenarios for the Alternative A site would not result in any significant operational or safety impacts to its adjacent road network. The October 2024 Traffic Impact Study concluded that all intersections are expected to operate at an acceptable LOS (LOS E or better) during a.m. and p.m. hours except for Wilma Rudolph Boulevard & North Edgewood Place, p.m. peak hour (LOS F).

Phase two of the Spring Creek Parkway, located along the western border of the Alternative A site, is currently under construction with tree clearing, grading, and site preparation underway. The new highway, expected to serve an estimated 40,000 vehicles per day, will connect Trenton Road to the north with North Edgewood Place and Wilma Rudolf Bouevard when complete. Similar to the 1.3-mile Phase one of the Spring Creek Parkway, which is completed and stretches from Trenton Road to just north of Spring Creek, the second phase is a four-lane, divided highway but will also include a 681-foot-long bridge over Spring Creek. The Spring Creek Parkway is scheduled for completion in Summer of 2027 (City of Clarksville, 2025).

The completion of the Spring Creek Parkway was not accounted for in the October 2024 Traffic Impact Study. The parkway will be signalized at both ends with intersection improvements at Wilma Rudolph Boulevard and North Edgewood Place to account for the anticipated use of the parkway as a cross-connecting four-lane highway. LOS is anticipated to substantially improve with intersection improvements at Wilma Rudolph Boulevard and North Edgewood Place as a component of Phase two of the Spring Creek Parkway project.

The anticipated LOS at major intersections in the vicinity of the Alternative A site in 2028 is shown in Table 3-9.

Table 3-9. Level of Service at Major Intersections Surrounding Alternative A for 2028 Future Conditions

Intersection	LOS/Delay(s), Overall			
	Future 2028 No-Build		Future 2028 Build	
	a.m. Peak Hour	p.m. Peak Hour	a.m. Peak Hour	p.m. Peak Hour
Wilma Rudolph Blvd & S Hampton Place (Signalized)	A (6.0)	B (16.0)	A (5.6)	B (13.5)
Wilma Rudolph Blvd & N Edgewood Place (Two-way Stop-Controlled)	A (0.4)	F (311.6)	A (9.9)	F (424.9)
Wilma Rudolph Blvd & Westfield Ct/Holiday Drive (Signalized)	C (28.6)	D (43.1)	C (28.4)	D (53.3)
Wilma Rudolph Blvd & I-24 East Bound On-ramp/I-24 East Bound Off-ramp (Signalized)	A (8.8)	A (7.1)	A (8.5)	A (6.5)
Wilma Rudolph Blvd & I-24 West Bound On-ramp/I-24 West Bound Off-ramp (Signalized)	C (26.6)	C (24.5)	C (22.5)	C (27.6)
Wilma Rudolph Blvd & Fair Brook Place (Existing: Two-way Stop-controlled > Build: Signalized)	A (1.3)	B (13.7)	A (6.6)	D (35.9)
Wilma Rudolph Blvd & Athletic	B (10.2)	D (37.6)	B (10.5)	D (43.3)

Avenue (Signalized)				

Traffic volume on major roadways surrounding the Alternative A site is expected to increase by the following in the Future 2028 Build Scenario:

- Kennedy Lane (N) aka Ted Crozier Sr. Boulevard: 7.7%
- Athletic Avenue: 6.2%
- Wilma Rudolph Boulevard: 16.2%

A new signal is assumed for the Wilma Rudolph Blvd/Fair Brook Place intersection under Sub-Alternative A1. No other potential improvement strategies for traffic operations were identified in the traffic study for Alternative A. Through coordination with local communities, Montgomery County Highway Department, and TDOT, traffic impacts are expected to be less than significant.

3.13.2.2 Alternative B

Based on the findings of the October 2024 Traffic Impact Study, the Build Scenario for the Alternative B site would not result in any significant operational/safety impacts to its adjacent road network. Most intersections are expected to operate at an acceptable LOS (LOS E or better) during a.m. and p.m. hours except for:

- Wilma Rudolph Boulevard & Westfield Court, p.m. peak hour (LOS F)
- International Boulevard & Dunlop Lane, a.m. peak hour (LOS F)

The anticipated LOS at major intersections in the vicinity of the Alternative B site in 2028 is shown in Table 3-10.

Table 3-10. Level of Service at Major Intersections Surrounding Alternative B for 2028 Future Conditions

Intersection	LOS/Delay(s), Overall			
	Future 2028 No-Build		Future 2028 Build	
	a.m. Peak Hour	p.m. Peak Hour	a.m. Peak Hour	p.m. Peak Hour
Wilma Rudolph Blvd & Westfield Ct/Holiday Drive (Signalized)	C (28.6)	D (41.4)	D (42.7)	F (81.7)
Wilma Rudolph Blvd & I-24 East Bound On-ramp/I-24 East Bound Off-ramp (Signalized)	A (8.8)	B (11.1)	B (19.1)	B (12.0)
Wilma Rudolph Blvd & I-24 West	C (26.6)	C (34.1)	C (21.8)	E (76.2)

Bound On-ramp/I-24 West Bound Off-ramp (Signalized)				
Ted Crozier Sr. Blvd & Athletic Avenue-Site access (Signalized)	B (18.6)	D (47.9)	C (25.2)	E (74.4)
Dunlop Lane & Ted Crozier Sr. Blvd (Signalized)	D (39.9)	E (58.6)	E (66.4)	E (58.3)
Ted Crozier Sr. Blvd & Warfield Blvd (Signalized)	D (35.9)	D (49.0)	D (36.8)	E (70.4)
Dunlop Lane/Chesapeake Lane-Site Access (existing Two-way Stop-controlled, build Signalized)	A (1.6)	A (8.8)	B (11.4)	D (40.4)
International Blvd & Dunlop Lane (Signalized)	F (84.7)	E (58.8)	F (106.7)	E (69.9)

Traffic volume on major roadways surrounding the Alternative B site is expected to increase by the following in the Future 2028 Build Scenario:

- Ted Crozier Sr. Boulevard north of Dunlop Lane: 33.5%
- Athletic Avenue: 9.7%
- Wilma Rudolph Boulevard south of I-24: 5.6%
- East side of Warfield Boulevard: 4.5%

The City of Clarksville's Ted Crozier Boulevard and Dunlop Lane Intersection Improvement Project is well underway and is expected to be complete before the end of 2025, greatly reducing the current p.m. peak LOS from F (82.5) to E (58.6) at the failing intersection. The project adds a secondary southbound left-turn lane at the Dunlop Lane/Ted Crozier Sr. Boulevard intersection. With the completion of this project, impacts to traffic volume at Ted Crozier Sr. Boulevard north of Dunlop Lane as a result of Alternative B are expected to be less than significant.

Two intersections expected to operate at LOS F in the Build Scenario may require consideration of traffic mitigation measures to alleviate traffic congestion during peak hours. Recommended mitigation measures include the installation of a 250-foot yield-controlled right-turn lane to improve the Wilma Rudolph Boulevard and Westfield Court/Holiday Drive intersection with constraints including increased right-of-way, two monument signs, utilities, driveway modifications, and required signal modifications. With recommended improvements, LOS at Wilma Rudolph Boulevard and Westfield Court/Holiday Drive during p.m. peak hour improves from F (81.7) to C (23.8), decreasing by 57.9 seconds per vehicle. The International Boulevard/Dunlop Lane intersection, which is located northeast of Interstate 24, will continue to operate at LOS F based on projected growth regardless of the Proposed Action under Alternative B. With traffic mitigation measure implementation, and coordination with local communities, Montgomery County Highway Department, and TDOT, traffic impacts are expected to be less than significant.

3.13.2.3 Alternative C

Based on the findings of the October 2024 Traffic Impact Study, the Build Scenario for the Alternative C site will not result in any significant operational/safety impacts to its adjacent road network. All intersections are expected to operate at an acceptable LOS (LOS E or better) during a.m. and p.m. hours except for:

- Richview Road & Memorial Drive, p.m. peak hour (LOS F)
- Highway 76 (MLK Jr. Parkway) & Rufus Johnson Road, p.m. peak hour (LOS F)

The anticipated LOS at major intersections in the vicinity of the Alternative C site in 2028 is shown in Table 3-11.

Table 3-11. Level of Service at Major Intersections Surrounding Alternative C for 2028 Future Conditions

Intersection	LOS/Delay(s), Overall			
	Future 2028 No-Build		Future 2028 Build	
	a.m. Peak Hour	p.m. Peak Hour	a.m. Peak Hour	p.m. Peak Hour
Richview Road & Memorial Drive (Signalized)	E (66.4)	F (96.8)	E (65.3)	F (94.0)
Highway 76 (MLK Jr. Parkway) & Rufus Johnson Road (Signalized)	A (2.0)	A (7.8)	B (11.6)	F (231.1)
Highway 76 (MLK Jr. Parkway) & Madison Street (Signalized)	D (44.2)	E (56.0)	D (45.5)	E (65.5)
Madison Street & Richview Road (Signalized)	D (51.4)	E (60.3)	D (50.4)	E (58.1)
Richaven Road & Memorial Drive	A (0.2)	A (0.1)	A (0.2)	A (0.1)

(Two-way Stop-controlled				
Memorial Drive & Site Access (Two-way Stop-controlled	–	–	A (0.9)	B (13.8)

Traffic volume on major roadways surrounding the Alternative C site is expected to increase by the following in the Future 2028 Build Scenario:

- Highway 76 North (MLK Jr. Parkway): 21.8%
- Highway 76 S (MLK Jr. Parkway): 16.3%
- Madison Street East: 9.3%
- Madison Street West: 6.9%
- Memorial Drive West: 27.2%

The two intersections expected to operate at LOS F in the Build Scenario may require consideration of traffic mitigation measures. Recommended mitigation measures include a signal and right-turn lane at the Rufus Johnson Road & Hwy 76 (MLK Jr. Parkway) intersection to create gaps in cross traffic and allow site traffic to exit, and a roundabout at the Richview Road & Memorial Drive intersection to allow the site patrons equal opportunity to enter the intersection as opposing traffic. The improvement to the Rufus Johnson Road & Hwy 76 (MLK Jr. Parkway) intersection would reduce the LOS from F (231.1) to D (45.6). The suggested changes for Memorial Drive & Richview Road would improve the LOS from F (87.3) to A (6.7). Increased traffic volumes, particularly along Highway 76 North (MLK Jr. Parkway) and Memorial Drive West, would further be managed by these recommended operational improvements. With the implementation of mitigation measures, and coordination with local communities, Montgomery County Highway Department, and TDOT, traffic impacts are expected to be less than significant.

3.13.2.4 No Action Alternative

Under the No Action Alternative, the OPC would not be constructed or operated. There would be no impacts related to traffic, transportation, and parking associated with the No Action Alternative.

3.14 Utilities

3.14.1 Affected Environment

3.14.1.1 Alternative A, B, and C

Basic utilities in the vicinity of the Alternative sites (water, sewer, natural gas, and electric) are provided by various utility providers. Utility providers in the vicinity of the alternative sites were identified as follows:

- **CDE Light Band** provides electricity to the vicinity of the alternative sites.
- **Clarksville Gas and Water** supplies natural gas to the vicinity of the alternative sites.
- **Clarksville Gas and Water** supplies potable water and sanitary sewer, and separate stormwater sewer services to the vicinity of the alternative sites.

- **The City of Clarksville** supplies separate stormwater sewer services to the vicinity of the alternative sites.

3.14.2 Environmental Consequences

3.14.2.1 Sub-Alternatives A1 and A2, Alternative B, and Alternative C

The proposed OPC would result in an increase in the consumption of utilities, including electricity, natural gas, potable water, and sanitary sewer discharges. Stormwater management, as discussed in Section 3.5, would also be required for the Proposed Action. The proposed OPC is not anticipated to require extraordinary utility services beyond those of a similarly sized light commercial operation. Based on preliminary design information provided by the private entity, adequate utilities are likely to exist to supply the facility as currently proposed. However, each utility provider would require a review of the detailed final design plans to validate these preliminary findings and to determine connection/extension requirements to service the proposed OPC.

The City of Clarksville requires a permit to be issued by the city engineer for construction of utility extensions and connection to the water and/or sanitary sewer services of Clarksville. Plans of the proposed system that conform to city standards and have been approved by TDEC are also required. Additionally, it is unlawful to uncover, make any connections with or opening into, use, alter, or disturb any public sewer or appurtenance without a Building Sewer Permit. VA will have to obtain a class (a) residential and commercial services permit as opposed to a class (b) industrial services permit for the OPC.

To comply with the Energy Act of 2020, codified in 42 U.S.C. § 8253(e), the OPC will be metered for the efficient use and reduction of energy and water.

There are no significant impacts to utilities anticipated as a result of the proposed project.

3.14.2.2 No Action Alternative

Under the No Action Alternative, the OPC would not be constructed or operated. There would be no impacts related to utilities associated with the No Action Alternative.

3.15 Potential for Generating Substantial Controversy

VA solicited input from various Federal, State, and local government agencies regarding the Proposed Action. To date, no opposition or controversy has been identified. Refer to Section 5.0 and Appendix B for more information.

4.0 Protection and Mitigation Measures

Resource Area	Description	Type
Aesthetics	Design new structures to be architecturally and visually consistent with the current buildings located at the Alternative sites.	BMP
	Maintain landscaped areas, buildings, roadways, and signage.	BMP
	Incorporate existing topography and natural features into site design, wherever possible.	BMP
Air Quality	Use appropriate fugitive dust suppression measures.	BMP
	Use newer construction equipment with emissions controls and maintain equipment.	BMP
	Reduce idling of construction equipment and vehicles to minimize exhaust emissions.	BMP
	Implement site-specific SWPPP and Erosion and Sediment Control Plan to minimize and avoid fugitive dust, as applicable.	Regulatory Requirement
	If required, obtain a Non-Title V Construction Permit at least 120 days before starting construction for major sources, and at least 90 days in advance for minor sources, along with air contaminant source and emission point description forms. New Construction Permit applicants who are Non-Title V air contaminant sources are required to apply for a state operating permit within 30 days of startup.	Regulatory Requirement
Cultural and Historic Resources	In the event human remains or other cultural items, as defined by applicable state law are found during construction or operation of the OPC, work would be halted in the area, and the appropriate authorities and tribes would be contacted.	Regulatory Requirement
	If the project's scope of work changes from that which has been submitted to and concurred with by consulting parties, further coordination would be required. Further, respective tribes would be notified for additional consultation.	Regulatory Requirement
	For Alternative A only, implement a minimum 50-foot buffer around the established Johnson-Killebrew Cemetery during construction and operation.	Regulatory Requirement

Geology and Soils	Implement an Erosion and Sediment Control Plan to address soil disturbance during construction that includes the implementation of erosion and sediment control devices and stabilization practices.	Regulatory Requirement
	Construction activities in Tennessee that disturb one or more acres of soil or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain a NPDES Permit for Discharges of Stormwater Associated with Construction Activities (TNR100000), CGP. The private entity would obtain a NPDES permit, a Montgomery County Grading Permit, and develop an Erosion and Sediment Control Plan.	Regulatory Requirement
Hydrology, Stormwater, and Water Quality	Use environmentally sensitive site design, stormwater pollution prevention controls, good engineering practices, and construction BMPs.	BMP
	Implement appropriate groundwater engineering controls and dewatering practices should groundwater be encountered during construction.	BMP
	Locate machinery servicing and refueling areas away from waterways to reduce the possibility and minimize the impacts of any accidental spills or discharges.	BMP
	A Land Development Permit will be required from Montgomery County for land disturbance of one acre or more. A Land Disturbance Permit is required for construction activities.	Regulatory Requirement
	Implement site-specific SWPPP and Erosion and Sediment Control Plan to minimize run-off into local waterways. These plans are required as part of the NPDES Permit for Discharges of Stormwater Associated with Construction Activities (TNR100000), CGP. This is required for construction activities in Tennessee that disturb one or more acres of soil or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres.	Regulatory Requirement
Wildlife and Habitat	In advance of any proposed tree clearing during nesting season (March 1 to September 10 for Alternatives A and C and March 15 to September 10 for Alternative B), conduct a pre-construction clearance survey to determine the presence/absence of nesting MBTA birds, and coordinate with USFWS to determine the potential	Regulatory Requirement

	need for non-disturbance buffers or other mitigation, as required.	
	For Alternatives A and C only, restrict tree clearing to months when the Indiana Bat's summer occupancy season will not be impacted (April 1 to September 30). This tree clearing restriction is inclusive of the Northern Long-eared Bat and Tri-colored Bat's pup season.	Conservation Measure
	For Alternative C only, to reduce potential impacts to the Little Brown Bat, limit tree clearing for an additional 15 days to avoid the species' summer maternity season (April 1 to October 15).	Conservation Measure
	For Alternative A and C only, minimize disturbance in foraging and commuting corridors for the Indiana Bat, especially near water bodies and riparian zones.	BMP
	For Alternative A and C only, maintain a 150-foot buffer around known or potential roost trees during the summer occupancy season for Indiana Bats.	BMP
	Immediately stop construction if a Northern Long-eared Bat, Tri-colored Bat, Indiana Bat, or Little Brown Bat is observed. Cease activities until USFWS coordination is conducted.	BMP
	Reduce nighttime lighting and noise/vibration impacts near bat roost habitat.	BMP
	Minimize lighting and maintain forested corridors to preserve habitat connectivity for the Northern Long-eared bat, Tri-colored bat, and Indiana bat species.	BMP
	Limit vegetation removal within the project area to the extent possible.	BMP
	Operate all vehicles traveling within and around the Proposed Action site in accordance with posted speed limits.	BMP
Noise	Limit construction-related noise near sensitive receptors and coordinate proposed construction activities in advance with any nearby sensitive receptors.	BMP

	Shut down noise-generating equipment when it is not needed and maintain equipment per manufacturer's recommendations to minimize noise generation.	BMP
	Utilize broadband, self-adjusting backup alarms in lieu of backup-beepers consistent with applicable safety requirements.	BMP
	Locate stationary operating equipment as far away from sensitive receptors as possible.	BMP
	Comply with Section 10-303 of the Clarksville, Tennessee Code of Ordinances which prohibits offending sound from commercial uses between the hours of 6:00 a.m. and midnight at 80 dB(A) and midnight to 6:00 a.m. at 75 dB(A), and impulsive sound between the hours of 6:00 a.m. and midnight at 80 dB(A) and midnight to 6:00 a.m. at 80 dB(A). Section 10-308 provides some exemptions for excavation, construction, demolition, repair, paving, or alteration of buildings or streets.	Regulatory requirement
	Select material transportation routes as far away from sensitive receptors as possible.	BMP
	Maintain equipment per manufacturer's recommendations to minimize noise generation.	BMP
Land Use	Consultation with the Clarksville-Montgomery County Regional Planning Commission may be required for re-zoning purposes.	Regulatory requirement
Floodplains and Wetlands	For Alternative A only, if site plans change such that floodplains would be impacted, obtain a Montgomery County Floodplain Development Permit to ensure compliance with both community ordinances and NFIP standards.	Regulatory requirement
	For Alternative A, obtain a CWA Section 404 permit from USACE for the discharge of dredged or fill material into WOTUS.	Regulatory requirement
	In Tennessee, an ARAP is required to carry out any activity which results in the alteration of the physical, chemical, radiological, biological, or bacteriological properties of any waters of the state, including wetlands, regardless of federal jurisdiction. The ARAP further satisfies CWA Section 401 permit requirements.	Regulatory requirement
	Comply with buffer requirements for streams, ponds and wetlands, according to the Montgomery County	Regulatory requirement

	Water Quality Buffer Policy and TDEC CGP. Buffers range from a minimum of 15 feet to a maximum of 60 feet.	
Socioeconomics	Secure the construction area to prevent unauthorized access to the property and to reduce the potential of health and safety risks.	Protection Measure
Community Services	Coordinate any short-term road closures with the local emergency and transportation services to prevent significant disruption to their services.	BMP
Solid Waste and Hazardous Materials	Store and appropriately label petroleum products and hazardous materials in approved containers.	Regulatory requirement
	Use secondary containment systems around fuel storage containers during refueling activities. Should a spill or release occur, any impacted soil would be properly handled per Federal and State laws and regulations.	Regulatory requirement
	All solid waste, hazardous materials, and medical waste would be managed and disposed of in compliance with federal, state, and local regulations.	Regulatory requirement
	Obtain and adhere to a Hazardous Waste Management Permit from TDEC DSWM.	Regulatory requirement
Traffic, Transportation, and Parking	Coordinate with the City of Clarksville on any short-term road closures during construction.	BMP
	Sequence construction and implement recommended mitigation measures to the extent feasible to minimize impacts to traffic or transportation patterns.	BMP
	Implement mitigation measures, in coordination with local communities, Montgomery County, and TDOT, to address increased traffic volumes and levels of service at nearby intersections. Further traffic analysis may be warranted to identify the necessary improvements to offset additional traffic.	Regulatory Requirement
Utilities	Coordinate with the various utility providers to determine connection/extension requirements which would service the proposed OPC.	BMP
	Install building metering for energy and water.	Regulatory Requirement

	Obtain a City of Clarksville, Tennessee Water and/or Sewer Service Permit or Building Sewer Permit, as applicable.	Regulatory Requirement

5.0 Public Participation

VA invites public participation in decision-making on new proposals through the NEPA process. Agencies, organizations, and members of the public with a potential interest in the proposed action are encouraged to participate.

5.1 Agency Coordination

VA coordinated with agencies regarding the proposed OPC construction and operation in Clarksville, TN. In November 2024, VA distributed scoping letters to Federal, State, county, and municipal government agencies, including USACE, USDA, and USFWS. Separately, pursuant to Section 106 of the NHPA of 1966, as amended, (54 U.S.C. § 306108), and its implementing regulations (36 CFR Part 800 – Protection of Historic Properties), VA will initiate consultation with consulting parties to seek input regarding the undertaking's effects on historic properties. VA will consult with the following parties pursuant to Section 106 of the NHPA: Tennessee Historical Commission; U.S. Department of the Interior Indian Affairs; Tennessee Commission of Indian Affairs; the City of Clarksville; and the Montgomery County Planning Department. The Final EA will include all NHPA Section 106 consultation records within Appendix C.

In addition to the regulatory framework of NEPA, various Federal, State, and/or local environmental permits and approvals are required as part of the Proposed Action (Appendix A). This list may not be exhaustive and additional compliance requirements and/or permits may be necessary.

5.2 Native American Consultation

Pursuant to Section 106 of the NHPA of 1966, as amended (54 U.S.C. § 306108), and its implementing regulations (36 CFR Part 800 – Protection of Historic Properties), VA will consult with Federally-recognized Indian tribes in the vicinity of the Proposed Action, including Eastern Band of Cherokee Indians, Alabama-Coushatta Tribe of Texas, Coushatta Tribe of Louisiana, Muscogee Creek Nation, Eastern Shawnee Tribe, Cherokee Nation, and Osage Nation. Responses to Section 106 consultation letters to the tribes will be included in Appendix C of the Final EA.

5.3 Scoping

VA provided Federal, State, and local agencies; the public; and potentially affected parties with an opportunity to participate in scoping. Scoping is a tool for identifying the issues that should be addressed during the NEPA and NHPA compliance processes. Scoping allows the agencies, public, and stakeholders to help define priorities and express stakeholder and community issues to the agency through oral and written comments.

VA published a notice of scoping on November 8 and 10, 2024 in *The Leaf Chronicle* as well as on the VA Construction and Facilities Management website. The notice described the Proposed Action and solicited public comments with a deadline of 30 days after the publishing date, or December 8, 2024.

VA electronically sent letters to Federal, State, and local agencies; public officials; Federally-recognized Indian tribes; and any identified special interest groups. Similar to the notices published in the newspaper, the letters included information on the Proposed Action, comment period, and instruction on submitting comments. VA received no comments or scoping responses.

5.4 Public Review

VA published and distributed this Draft EA for a 30-day public comment period as announced by a Notice of Availability published in *The Leaf Chronicle*. Review copies of the Draft EA are available online at https://www.cfm.va.gov/environmental/index.asp or at the Clarksville-Montgomery County Public Library located at 350 Pageant Lane, Suite 501, Clarksville, TN 37040. VA will address public comments in the Final EA.

6.0 Agencies and Persons Consulted

Affiliation	Mailing Address
Federal Agencies	
U.S. Army Corps of Engineers Nashville District Great Lakes and Ohio River Division	USACE Nashville District 110 9th Avenue South Nashville, TN 37203
U.S. Department of Agriculture Rural Development Service Center Office	441 Donelson Pike Suite 310 Nashville, TN 37214-3568
U.S. Department of Agriculture Clarksville Service Center	25 Jefferson St. Suite 101 Clarksville, TN 37040
U.S. Fish and Wildlife Service Tennessee Ecological Services Field Office	446 Neal St. Cookeville, Tennessee, 38501
U.S. Department of the Interior Indian Affairs - Eastern Regional Office	545 Marriott Dr. Suite 700 Nashville, TN 37214
State Agencies	
Tennessee Commission of Indian Affairs	401 Church St. 1st Floor, L&C Annex Nashville, TN 37243
Tennessee Historical Commission	2941 Lebanon Pike Nashville, TN 37214
Tennessee Wildlife Resources Agency	5107 Edmondson Pike Ellington Agricultural Center Nashville, TN 37211
Tennessee Department of Environment & Conservation	Davy Crockett Tower 500 James Robertson Parkway Nashville, TN 37243
Tennessee Board of Water Quality, Oil & Gas	Davy Crockett Tower 500 James Robertson Parkway Nashville, TN 37243
Division of Water Resources	Davy Crockett Tower 500 James Robertson Parkway Nashville, TN 37243

Affiliation	Mailing Address
Local Agencies	
Clarksville-Montgomery County Planning Commission	329 Main St. Clarksville, TN 37040
Montgomery County Soil & Water Conservation District	25 Jefferson St. Suite 101 Clarksville, TN 37040
Tribes	
Eastern Band of Cherokee Indians	P.O. Box 1927 Cherokee, NC 28719
Cherokee Nation	PO Box 948 Tahlequah, OK 74465
Alabama-Coushatta Tribe of Texas	571 State Park Road 56 Livingston, TX 77351
Coushatta Tribe of Louisiana	1940 C.C. Bel Rd. Elton, LA 70532
Muscogee Creek Nation	PO Box 580 Okmulgee, OK 74447
Osage Nation	Pawhuska, OK 74056
Eastern Shawnee Tribe	29 S Hwy 69A, Miami, OK 74354
Local Community	
North of Dunlop Lane and East of Ted Crozier Sr Blvd	
Civitan Park	650 Bellamy Ln. Clarksville, TN 37043
Rufus Johnson Blvd and Highway 76	
Clarksville-Montgomery Community Action Agency	150 Lafayette Rd. Clarksville, TN 37042
Fieldstone Place (Five Star Senior Living)	51 Patel Way Clarksville, TN 37043
Clarksville High School	151 Richview Rd. Clarksville, TN 37043
West of 3050 Wilma Rudolph Blvd	

Affiliation	Mailing Address
The Preserve at Spring Creek	200 S Hampton Pl. Clarksville, TN 37040

7.0 List of Preparers

7.1 Department of Veterans Affairs Staff

Mr. Jason Sturm
Environmental Engineer
Construction & Facilities Management
U.S. Department of Veterans Affairs

Ms. Rebecca Lopez
Environmental Engineer
Construction & Facilities Management
U.S. Department of Veterans Affairs

7.2 LRS Federal, LLC

Name and Title	Years of Experience
Jesse Byrd, Project Manager	20
Sara Schulkowski, Environmental Engineer	7

8.0 References Cited

City of Clarksville, Tennessee. (July 2023). The Zoning Ordinance of the City of Clarksville, Tennessee. Retrieved December 11, 2024, from: https://www.cmcrpc.com/wp-content/uploads/2021/09/City-Zoning-Ordinance-Updated-July-2023.pdf

City of Clarksville, Tennessee. (n.d.). Clarksville Transit System. Retrieved December 12, 2024, from: https://www.clarksvilletn.gov/338/Clarksville-Transit-System

City of Clarksville, Tennessee (n.d.). Services. Retrieved February 21, 2025, from: https://www.clarksvilletn.gov/467/Services#:~:text=CDE%20Lightband%20offers%20electric%2C%20television,22%2C000%20customers%20with%20broadband%20services

City of Clarksville, Tennessee. (n.d.). Stormwater. Retrieved December 20, 2024, from: https://www.clarksvilletn.gov/191/Stormwater

City of Clarksville, Tennessee. (October 10, 2024). Clarksville, Tennessee – Code of Ordinances/Title 10 – Offenses – Miscellaneous/Chapter 3 – Anti-Noise Regulations. Retrieved December 12, 2024, from: https://library.municode.com/tn/clarksville/codes/code_of_ordinances?nodeId=TIT10OFIS_CH3ANISRE

City of Clarksville, Tennessee. (October 10, 2024). Clarksville, Tennessee – Code of Ordinances/Title 16 – Building, Utility, and Housing Codes. Retrieved February 4, 2025, from: https://library.municode.com/tn/clarksville/codes/code_of_ordinances?nodeId=TIT4BUUTHOCO

Clarksville-Montgomery County Regional Planning Commission. (n.d.). Clarksville-Montgomery County Zoning. Retrieved December 11, 2024, from: https://www.cmcrpc.com/maps/

Clarksville-Montgomery County School System. (2024). School Zone Maps. Retrieved November 21, 2024, from: https://www.cmcss.net/bus-zoning/

Clarksville Fire & Rescue. (2024). Response Map. Retrieved November 21, 2024, from: https://www.clarksvilletn.gov/1317/Response-Map

Clarksville Gas & Water. (n.d.). About Us. Retrieved December 20, 2024, from: https://www.clarksvilletn.gov/324/Water

Clarksville Police Department. (2024). About Us. Retrieved November 21, 2024, from: https://www.clarksvilletn.gov/1256/About-Us

Department of Veterans Affairs. (n.d.). Clarksville VA Clinic. Retrieved October 2, 2024, from: https://www.va.gov/tennessee-valley-health-care/locations/clarksville-va-clinic/

Department of Veterans Affairs. (n.d.). Dalton Drive VA Clinic. Retrieved October 2, 2024, from: https://www.va.gov/tennessee-valley-health-care/locations/dalton-drive-va-clinic/

Department of Veterans Affairs. (n.d.). Fort Campbell VA Clinic. Retrieved October 2, 2024, from: https://www.va.gov/tennessee-valley-health-care/locations/fort-campbell-va-clinic/

FEMA. (December 10, 2024). National Flood Hazard Layer Viewer. Retrieved December 10, 2024, from: https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd

FEMA. (January 2022). How to Read a Flood Map. Retrieved December 10, 2024, from: https://www.fema.gov/sites/default/files/documents/how-to-read-flood-insurance-rate-map-tutorial.pdf

Google Earth. (2022).

LRS Federal LLC. (October 2024). Clarksville, Tennessee Veterans Affairs Outpatient Clinic Draft Regulatory Requirements Report.

McKay-Burchett & Company Engineers. (October 18, 2023). Phase I Environmental Site Assessment for the Rufus Johnson Boulevard Property.

Montgomery County Government, TN. (2025). Stormwater Management Program Chapter 5 – Water Quality Buffer Requirements. Retrieved January 29, 2025, from: https://mcgtn.org/storage/departments/stormwater/SWMM%20Chapter%205%20Water%20Quality%20Buffer%20Requirements.pdf

SWCA Environmental Consultants. (February, 2025). Biological Survey Report Jurisdictional Waters Determinations and Threatened and Endangered Species Assessments For The Dunlop Lane Tract, Clarksville, Tennessee.

SWCA Environmental Consultants. (February, 2025). Biological Survey Report Jurisdictional Waters Determinations and Threatened and Endangered Species Assessments For The N. Edgewood Tract, Clarksville, Tennessee.

SWCA Environmental Consultants. (February, 2025). Biological Survey Report Jurisdictional Waters Determinations and Threatened and Endangered Species Assessments for The Rufus Johnson Road and Highway 76 Tract, Clarksville, Tennessee.

SWCA Environmental Consultants. (January, 2025). Phase I Cultural Resources Assessment Survey for the Veterans Affairs North Edgewood Development, Clarksville, Montgomery County, Tennessee.

SWCA Environmental Consultants. (January, 2025). Phase I Cultural Resources Survey of the Veterans Affairs Dunlop Lane Development, Clarksville, Montgomery County, Tennessee.

SWCA Environmental Consultants. (January, 2025). Phase I Cultural Resources Survey of the Veterans Affairs Rufus Johnson Development, Clarksville, Montgomery County, Tennessee.

TDEC. (n.d.). Climate Change and Public Health. Retrieved January 13, 2025, from: https://www.tn.gov/health/cedep/environmental/climate-change.html#:~:text=Storms%20will%20be%20more%20intense,in%20the%20global%20food%20supply

TDEC. (n.d.). Traveling Guide for Tennessee’s Watersheds. Retrieved January 7, 2025, from: https://www.tn.gov/content/dam/tn/environment/water/documents/watershed-guide.pdf

TDEC Division of Water Resources. (2007). Red River Watershed (05130206) of the Cumberland River Basin Watershed Water Quality Management Plan. Retrieved January 8, 2025, from: https://www.tn.gov/content/dam/tn/environment/water/watershed-planning/wqm-plans/wr-ws_watershed-plan-red-2007.pdf

TDEC Division of Water Resources. (n.d.). Exceptional TN Waters – TDEC Dataviewers. Retrieved January 29, 2025, from: https://dataviewers.tdec.tn.gov/dataviewers/f?p=9034:34304

Tennessee Department of Veteran Services (n.d.). TN Veteran Population. Retrieved October 2, 2024, from: https://www.tn.gov/veteran/tnvetmap.html

Tennessee Valley Authority. (n.d.). TVA's Local Power Company Partners. Retrieved December 20, 2024, from: https://www.tva.com/energy/public-power-partnerships/local-power-companies/nashville-electric-service#:~:text=Nashville%20Electric%20Service%20is%20one,Williamson%2C%20Wilson%20and%20Cheatham%20counties

Terracon Consultants, LLC. (October 4, 2023). Phase I Environmental Site Assessment 1 for the West of 3050 Wilma Rudolph Boulevard Site.

Terracon Consultants, LLC. (October 4, 2023). Phase I Environmental Site Assessment 2 for the West of 3050 Wilma Rudolph Boulevard Site.

TTL, Inc. (September 11, 2023). Phase I Environmental Site Assessment Report for the 501 Dunlop Lane Site.

TTL, Inc. (September 29, 2023). Limited Phase II Environmental Site Assessment Report for the 501 Dunlop Lane Site.

United States Census Bureau. (2024). S2101 Veteran Status. Retrieved October 2, 2024, from: https://data.census.gov/table/ACSST1Y2023.S2101?q=veterans%20in%20Clarksville%20city,%20Tennessee

United States Department of Veterans Affairs. (2023). NCA Master Construction Specifications. Retrieved December 12, 2024, from: https://www.cfm.va.gov/til/ncaSpec.asp#01

USDA (2024). Web Soil Survey. Retrieved December 11, 2024, from: https://websoilsurvey.nrcs.usda.gov/app/

United States Environmental Protection Agency. (2024). The EPA Map of Radon Zones. Retrieved January 15, 2025, from: https://www.epa.gov/radon/epa-map-radon-zones

USEPA. (2024). Ecoregions of Tennessee. Retrieved December 11, 2024, from: https://gaftp.epa.gov/EPADataCommons/ORD/Ecoregions/tn/TNFront.pdf

USFWS. (December 10, 2024). National Wetlands Inventory. Retrieved December 10, 2024, from: https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/

Veteran Affairs. (n.d.). Summary of VHA Facility Complexity Model.

9.0 Glossary

Aesthetics—Pertaining to the quality of human perception of natural beauty.

Ambient—The environment as it exists around people, plants, and structures.

Ambient Air Quality Standards—Those standards established according to the Clean Air Act to protect health and welfare.

Aquifer—An underground geological formation containing usable amounts of groundwater that can supply wells and springs.

Attainment area—Region that meets the National Ambient Air Quality Standard (NAAQS) for a criteria pollutant under the Clean Air Act.

Best management practices (BMPs)—Methods, measures, or practices to prevent or reduce environmental impacts.

Contaminants—Any physical, chemical, biological or radiological substances that have an adverse effect on air, water, or soil.

Cultural resources—The physical evidence of our Nation's heritage. Includes archaeological sites; historic buildings, structures, and districts; and localities with social significance to the human community.

Decibel (dB)—A unit of measurement of sound pressure level.

Direct impact—A direct impact is caused by a proposed action and occurs at the same time and place.

Emission—A release of a pollutant.

Endangered species—Any species which is in danger of extinction throughout all or a significant portion of its range.

Environmental assessment (EA)—An EA is a publication that provides sufficient evidence and analyses to show whether a proposed system will adversely affect the environment or be environmentally controversial.

Erosion—The wearing away of the land surface by detachment and movement of soil and rock fragments through the action of moving water and geological agents.

Floodplain—The relatively flat area or lowlands adjoining a river, stream, ocean, lake, or other body of water that is susceptible to being inundated by floodwaters.

Fugitive dust—Particles light enough to be suspended in air but not captured by a filtering system. For this document, this refers to particles put in the air by moving vehicles and air movement over disturbed soils at construction sites.

Geology—Science which deals with the physical history of the earth, the rocks of which it is composed, and physical changes in the earth.

Groundwater—Water found below the ground surface. Groundwater may be geologic in origin and as pristine as it was when it was entrapped by the surrounding rock or it may be subject to daily or seasonal effects depending on the local hydrologic cycle. Groundwater may be pumped from wells and used for drinking water, irrigation, and other purposes. It is recharged by precipitation or irrigation water soaking into the ground. Thus, any contaminant in precipitation or irrigation water may be carried into groundwater.

Hazardous materials—Defined within several laws and regulations to have certain meanings. For this document, a hazardous material is any one of the following:

Any substance designated pursuant to section 311 (b)(2)(A) of the Clean Water Act.

Any element, compound, mixture, solution, or substance designated pursuant to Section 102 of Comprehensive Environmental Response, Compensation and Liability (CERCLA).

Any hazardous substance as defined under the Resource Conservation and Recovery Act (RCRA).

Any toxic pollutant listed under TSCA.

Any hazardous air pollutant listed under Section 112 of the Clean Air Act.

Any imminently hazardous chemical substance or mixture with respect to which the EPA Administrator has taken action pursuant to Subsection 7 of TSCA.

The term does not include: 1) Petroleum, including crude oil or any thereof, which is not otherwise specifically listed or designated as a hazardous substance in a above. 2) Natural gas, natural gas liquids, liquefied natural gas, or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas). A list of hazardous substances is found in CFR 302.4.

Indirect impact—An indirect impact occurs later in time or farther removed in distance from the action causing it but is still reasonably foreseeable. Indirect impacts may include induced changes in the pattern of land use, population density or growth rate, and related effects on air, water, and other natural and social systems.

Jurisdictional wetland—Areas that meet the wetland hydrology, vegetation, and hydric soil characteristics, and have a direct connection to the Waters of the U.S. These wetlands are regulated by the USACE.

Listed species—Any plant or animal designated by a state or the federal government as a threatened, endangered, special concern, or candidate species.

Mitigation—Measures taken to reduce adverse impacts on the environment.

National Ambient Air Quality Standards (NAAQS)—Nationwide standards set up by the USEPA for widespread air pollutants, as required by Section 109 of the Clean Air Act. Currently, six pollutants are regulated by primary and secondary NAAQS: carbon monoxide, lead, nitrogen dioxide, ozone, particulate matter, and sulfur dioxide.

Non-attainment area—An area that has been designated by the EPA or the appropriate State air quality agency as exceeding one or more national or state ambient air quality standards.

Parcel—A plot of land, usually a division of a larger area.

Particulates or particulate matter—Fine liquid or solid particles such as dust, smoke, mist, fumes, or smog found in air.

Physiographic region—A portion of the Earth’s surface with a basically common topography and common morphology.

Remediation—An action that reduces or eliminates a threat to the environment; often used to refer to “clean up” of chemical contamination in soil or water.

Sensitive receptors—Include, but are not limited to children, and the elderly, as well as specific facilities, such as long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, residences, schools, playgrounds, and childcare centers.

Significant impact—According to 40 CFR 1508.27, “significance” as used in NEPA requires consideration of both context and intensity.

Context. The significance of an action must be analyzed in several contexts such as society as a whole (human, national), the affected region, the affected interests, and the locality. Significance varies with the setting of the proposed action. For instance, in the case of a site-specific action, significance would usually depend upon the effects in the locale rather than in the world as a whole. Both short- and long-term effects are relevant.

Intensity. This refers to the severity of impact. Responsible officials must bear in mind that more than one agency may make decisions about partial aspects of a major action.

Soil—The mixture of altered mineral and organic material at the earth's surface that supports plant life.

Solid waste—Any discarded material that is not excluded by section 261.4(a) or that is not excluded by variance granted under sections 260.30 and 260.31.

Threatened species—Any species that is likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range.

Topography—The relief features or surface configuration of an area.

Waters of the United States—Include the following: territorial seas and traditional navigable waters; tributaries; lakes, ponds, and impoundments of jurisdictional waters; and adjacent wetlands.

Watershed—The region draining into a particular stream, river, or entire river system.

Wetlands—Areas that are regularly saturated by surface or groundwater and, thus, are characterized by a prevalence of vegetation that is adapted for life in saturated soil conditions. Examples include swamps, bogs, fens, marshes, and estuaries.

Wildlife habitat—Set of living communities in which a wildlife population lives.

Appendix A Permits

In addition to the regulatory framework of NEPA the following federal, state, and/or local environmental permits are required as part of the proposed action.

TDEC Division of Water Resources NPDES Construction Stormwater General Permit

A Tennessee TDEC Division of Water Resources Construction General Permit (CGP) must be obtained by dischargers for projects that disturb one or more acres of soil or less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, as authorized by § 69-3-108 of the Tennessee Water Quality Control Act of 1977. The construction of the OPC on Alternative A, Alternative B, or Alternative C would require the disturbance of more than one acre of soil, therefore VA is required to obtain the CGP. To obtain a CGP, the TDEC requires the submission of a Notice of Intent (NOI) for Construction Activity – Stormwater Discharges with a site-specific SWPPP.

USACE CWA Section 404 Permit and Section 401 Certification

A CWA Section 404 permit is required for projects where activities will disturb jurisdictional waters of the U.S. (WOTUS) and a CWA Section 401 Water Quality Certification is issues to applicants for activities that may result in a discharge into jurisdictional waters of the U.S., including but not limited to the discharge of dredged or fill material. If impacts to WOTUS are unavoidable, the private entity would need to request a CWA Section 404 Permit Authorization from USACE – Nashville District, West Branch, and a CWA Section 401 Water Quality Certification from the Tennessee Division of Water Resources.

Montgomery County Floodplain Development Permit

Although a portion of the Alternative A site is located within a SFHA, impacts to the SFHA are not proposed. If site plans change such that floodplains would be impacted, a floodplain development permit would be required.

As required by the Federal Emergency Management Agency (FEMA) Code of Federal Regulations, National Flood Insurance Program, (NFIP) 44 CFR Part 60.3(a)(1), no work of any kind may begin in the Special Flood Hazard Area (SFHA) until a Floodplain Development Permit is issued. The permit shall be for all structures and for all development, including fill and other activities, as set forth in the Floodplain Regulations found in the Montgomery County Zoning Resolution.

Montgomery County Construction Stormwater Management Permits

Montgomery County Commission Resolution 24-2-2 § 3 outlines required permits and regulatory requirements to manage stormwater discharges to the waters of the State of Tennessee. The county has adopted The Nashville-Davidson County Metropolitan Stormwater Management Manual Volume 2, 4, and 5, as well as the Tennessee Permanent Stormwater Management and Design Guidance Manual and TDEC Erosion and Sediment Control Handbook as its Municipal Separate Storm Sewer System (MS4) Stormwater Construction Best Management Practices Manuals.

A Land Development Permit is required for all land development, including new development, redevelopment, and construction activities. A Land Development Permit will be required from the county for land disturbance of one acre or more; new development that involves land development activities of one acre or more; and redevelopment that involves land development activities of one acre or more.

A Land Disturbance Permit is required for construction activities. To obtain a Land Disturbance Permit, proof of coverage under the Tennessee Construction Stormwater General Permit, a copy of a SWPPP, and additional applicable local, state, and federal permits are required by the county when requested.

Landscaping and Stabilization Requirements state that any area of land where development activities have caused the whole or partial clearing of natural vegetative cover must be stabilized. This stabilization (temporary or permanent) must be completed no later than 14 days after construction activities at that portion of site have temporarily or permanently ceased.

To ensure all Erosion Prevention and Sediment Control measures are being properly implemented in accordance with the adopted stormwater control measure manuals listed in the Montgomery County Stormwater Regulations, all active construction sites in the county will be inspected monthly unless a different inspection interval is deemed necessary by the stormwater coordinator.

Nashville and Davidson County Grading Permit – Adopted by Montgomery County

A Grading Permit is required by the Nashville & Davidson County Metropolitan Department of Water and Sewerage Services (MWS) in Chapter 4, Volume 1 – Regulations of the County's Stormwater Management Manual for land disturbing activities. The Metropolitan Government of Nashville & Davidson County defines grading as any operation or occurrence by which the existing site elevations are changed; or where any ground cover, natural or man- made, is removed; or any watercourse or body of water, either natural or man- made, is relocated on any site, thereby creating an unprotected area, including stripping, cutting, filling, stockpiling, or any combination thereof, and shall apply to the land in its cut or filled condition.

If the project meets the applicability of a Grading Permit, the following is required to be submitted with the application before any land disturbing activities: copies of all applicable state and federal permits, Grading and Drainage Plans, Erosion Prevention and Sediment Control (EPSC) Plans, a Post-Construction Stormwater Management Plan, and sinkhole and drainage well information. The construction of the OPC on any alternative site would require land disturbing activities, therefore the Grading Permit would be required.

City of Clarksville, Tennessee Noise Regulations

Per Chapter 3 § 10-303 of the City of Clarksville, Tennessee Code of Ordinances, offending or impulsive sounds emanating from commercial uses between 6:00 a.m. and midnight must not measure above an A-weighted sound pressure level of eighty (80) dB(A) when measured from, at, or within the real property boundary, leased premises, or otherwise lawfully occupied premises of any complainant, and outside the real property boundary or leased premises from which the noise emanates.

Offending sounds from commercial uses between midnight and 6:00 a.m. must not measure above an A-weighted sound pressure level of seventy-five (75) dB(A) while impulsive sounds must not measure above an A-weighted sound pressure level of eighty (80) dB(A) when measured from, at, or within the real property boundary, leased premises, or otherwise lawfully occupied premises of any complainant, and outside the real property boundary or leased premises from which the noise emanates.

City of Clarksville, Tennessee Water and/or Sewer Service Permit

Per § 13-401 of the City of Clarksville, Tennessee Code of Ordinances, for water and/or sanitary sewer service to be made available to a desired area, a permit must be issued by the city engineer for utility construction of extensions of and connection to the water and/or sanitary sewer services of Clarksville. Plans of the proposed system that conform to city standards and have been approved by TDEC are also required.

City of Clarksville, Tennessee Building Sewer Permit

Per § 13-505 401 of the City of Clarksville, Tennessee Code of Ordinances, it is unlawful to uncover, make any connections with or opening into, use, alter, or disturb any public sewer or appurtenance without a Building Sewer Permit. VA will have to obtain a class (a) residential and commercial services permit as opposed to a class (b) industrial services permit for the OPC.

United States Department of Energy (DOE) Water Meter Requirement

The Energy Act of 2020, codified in 42 U.S.C. § 8253(e) requires, in accordance with DOE guidance, all federal agencies to meter federal buildings for the efficient use and reduction of cost of water.

TDEC Aquatic Resource Alteration Permit (ARAP)

The Tennessee Water Quality Control Act, T.C.A. § 69-3-108(b)(1), provides that it is unlawful for any person, except in accordance with the conditions of a valid permit, to carry out any activity which results in the alteration of the physical, chemical, radiological, biological, or bacteriological properties of any waters of the state, including wetlands. Rule 0400-40-07 of the TDEC specifies that State permits for these activities are ARAPs. Spring Creek, found along the northern portion of the Alternative A site, is considered Exceptional Tennessee Waters by the TDEC. All alternative sites contain water features that may be considered WOTS.

The application process for an ARAP and Section 401 Certification is the same and an ARAP also serves as a Section 401 Certification where required.

Actions that qualify as alterations that require a permit from the Tennessee Division of Water Resources include dredging, excavation, channel widening, or straightening; bank sloping or stabilization; channel relocation; water diversion or withdrawals; dams, weirs, dikes, levees, or other similar structures; flooding, excavating, draining and/or filling a wetland; road and utility crossings; structural fill.

TDEC CAA Air Quality Construction Permit and Air Quality Operating Permit

Per Tennessee Air Pollution Control Rule 1200-03-09-.01(1)(a), "…no person shall begin the construction of a new air contaminant source or the modification of an air contaminant source which may result in the discharge of air contaminants without first having applied for and received from the Technical Secretary a construction permit…". This rule requires any individual wishing to construct an air contaminant source or to modify an existing air contaminant source is required to obtain a construction permit from the Division of Air Pollution Control (APC) unless specifically exempted.

If designs of the VA OPC indicate it will not be a Title V permitted facility, it may still be subject to minor new source review and will be required to obtain a Non-Title V Construction Permit at least 120 days before starting construction for major sources, and at least 90 days in advance for minor sources, along with air contaminant source and emission point description forms. New Construction Permit applicants who are Non-Title V air contaminant sources are required to apply for a state operating permit within 30 days of startup.

TDEC Prevention of Fugitive Dust

As part of the state's EPA-enforced State Implementation Plan, Tennessee APC Rule 1200-03-08-.01 states that reasonable precautions must be taken to prevent particulate matter from becoming airborne during construction activities. It is unlawful for fugitive dust emissions to exceed five (5) minutes per hour or twenty (20) minutes per day as to produce a visible emission beyond the property line of the property on which the emission originates, excluding malfunction of equipment.

TDEC Division of Solid Waste Management (DSWM) Hazardous Waste Management Permit

The USEPA has delegated enforcement of the RCRA Subtitle C hazardous waste requirements to the Tennessee DSWM. TDEC Rule 0400-12-01 requires any person owning or operating a new or existing facility that treats, stores, or disposes of hazardous waste to obtain a Hazardous Waste Management Permit. If construction or demolition debris generated onsite is designated as hazardous waste, this permit would be required.

TDEC DSWM Special Waste Application

Those who want to send special waste to a Tennessee-permitted disposal or processing facility must submit a Special Waste Application for evaluation which, if approved, is to be recertified every three fiscal years. T.C.A. § 68-211-102(b) declares that the policy of Tennessee is to ensure that no hazardous waste is disposed of in a solid waste disposal facility, leading to the creation of the DSWM's creation of the Special Waste Program. The DSWM considers medical wastes as special waste, which the OPC is likely to produce, and is generally prohibited from processing in solid waste disposal facilities. Solid Waste Rule 0400-11-01-.04(2)(k)4 states, however, that some specific medical wastes can be disposed in a solid waste disposal facility after treatment to render them non-infectious or, in the case of sharps, have been securely packaged in a puncture-proof container.

Appendix B Agency Correspondence and Public Engagement

B.1 Scoping Notice

U.S. DEPARTMENT OF VETERANS AFFAIRS
Office of Construction & Facilities Management
Washington DC 20420

November 5, 2024
(*Sent via email*)

SUBJECT: Environmental Assessment Scoping Notice for the Proposed Construction and Operation of an Outpatient Clinic in Clarksville, Tennessee **[VA ID# EAXX-029-15-VHA-1729883798]**

Dear Valued Stakeholder:

The U.S. Department of Veterans Affairs (VA) is proposing to construct and operate an outpatient clinic (OPC) in Clarksville, Tennessee (the Proposed Action). The purpose of the Proposed Action is to provide enhanced and expanded primary care and mental health services and add a comprehensive array of specialty care outpatient services to serve Veterans in Clarksville and the surrounding communities in a modern, state-of-the-art facility. The OPC will be constructed by a private entity for the VA to lease and operate at one of three sites being considered (Figure 1):

(1) North Edgewood Place
(2) 501 Dunlop Lane
(3) Rufus Johnson Blvd and Highway 76

VA is preparing an environmental assessment (EA) to analyze the potential environmental impacts of the Proposed Action. VA is seeking input from stakeholders as part of the scoping process in the development of this document. VA is preparing the EA in accordance with the National Environmental Policy Act of 1969 (NEPA) (42 U.S. Code [USC] § 4321- 4370), as implemented by the Council on Environmental Quality (40 Code of Federal Regulations [CFR] Parts 1500-1508), and VA's NEPA regulations (38 CFR Part 26).

Through this notice, VA is also providing the public with information about the undertaking and seeking input about the undertaking's effects on historic properties pursuant to Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, (54 USC § 306108), and its implementing regulations (36 CFR Part 800 – Protection of Historic Properties). VA is using its procedures for public involvement under NEPA in lieu of public involvement requirements in Subpart B of the Section 106 regulations per 36 CFR Part 800.2(d)(3). This notice does not serve as an invitation to consult under Section 106, it is solely to seek and consider the views of the public. VA conducted its Section 106 review and consultation separately.

If you have comments on the scope of the EA, the range of alternatives, and environmental issues for in-depth analysis, please email your comments to vacoenvironment@va.gov with the subject line "Clarksville OPC EA".

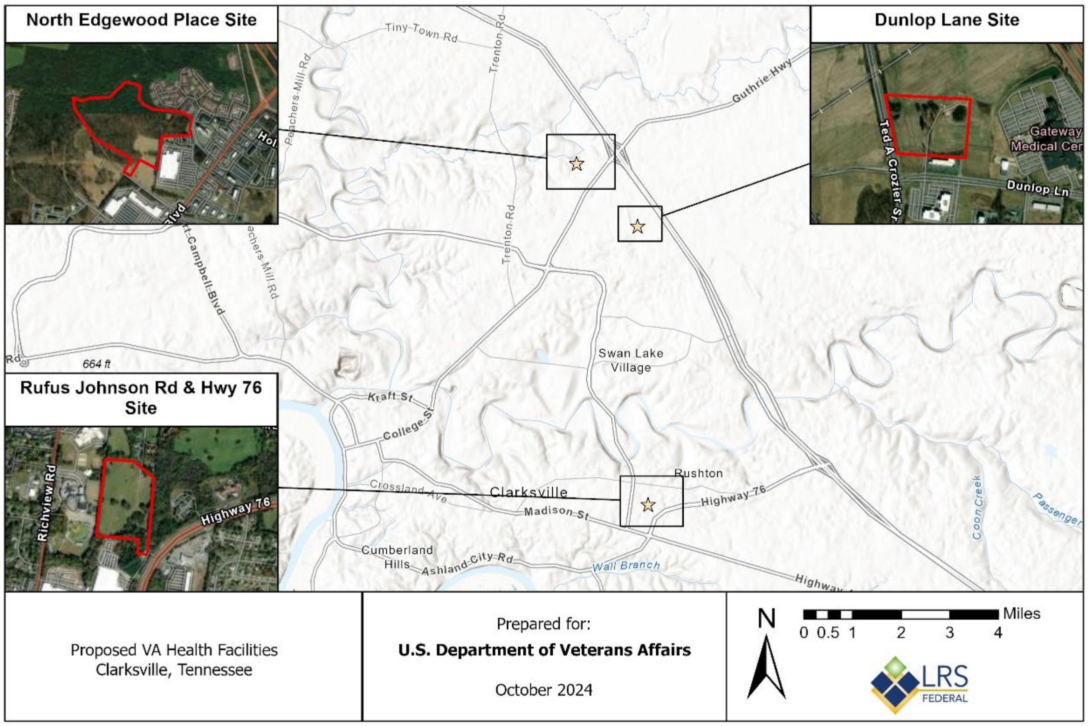
Additionally, VA will publish the Draft EA online at http://www.cfm.va.gov/environmental/index.asp for a 30-day public review and comment period. The Notice of Availability will be posted in *The Leaf Chronicle*.

Respectfully,

GLENN ELLIOTT Digitally signed by GLENN ELLIOTT
Date: 2024.11.05 09:30:37 -05'00'

Glenn Elliott
Director, Project Development Services Division
Office of Construction and Facilities Management

Figure 1. Proposed Locations for a VA Outpatient Clinic – Site Vicinity Map
Source: (LRS Federal, 2024)



U.S. DEPARTMENT OF VETERANS AFFAIRS OFFICE OF CONSTRUCTION AND FACILITIES MANAGEMENT

NOTICE OF SCOPING AND PUBLIC INVOLVEMENT UNDER THE NATIONAL ENVIRONMENTAL POLICY ACT FOR THE PROPOSED VETERAN AFFAIRS OUTPATIENT CLINIC IN CLARKSVILLE, TENNESSEE [VA UPDATE: VA ID# EAXX-029-15-VHA-1729883798]

The U.S. Department of Veterans Affairs (VA) is proposing to construct and operate a new outpatient clinic in Clarksville, TN (the Proposed Action). The purpose of the Proposed Action is to provide enhanced and expanded primary care and mental health services and add a comprehensive array of specialty care outpatient services to serve Veterans in Clarksville and the surrounding communities in a moder, state-of-the-art facility. The OPC will be constructed by a private entity for the VA to lease and operate at one of three sites being considered:

(1) North Edgewood Place
(2) 501 Dunlop Lane
(3) Rufus Johnson Blvd and Highway 76

VA is preparing an environmental assessment (EA) to assess the potential environmental impacts of the Proposed Action. VA is preparing the EA in accordance with the National Environmental Policy Act of 1969 (NEPA) (42 U.S. Code [USC] § 4321- 4370), as implemented by the Council on Environmental Quality (40 Code of Federal Regulations [CFR] Parts 1500-1508), and VA's NEPA regulations (38 CFR Part 26).

Through this notice, VA is providing the public with information about the undertaking and seeking public comment and input about the undertaking's effects on historic properties pursuant to Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, (54 USC § 306108), and its implementing regulations (36 CFR Part 800 – Protection of Historic Properties). VA is using its procedures for public involvement under NEPA in lieu of public involvement requirements in Subpart B of the Section 106 regulations per 36 CFR Part 800.2(d)(3). This notice does not serve as an invitation to consult under Section 106, it is solely to seek and consider the views of the public. VA conducted its Section 106 review and consultation separately.

If you have comments on the scope of the EA, the range of alternatives, and environmental issues for in-depth analysis, please email your comments to vacoenvironment@va.gov with the subject line "Clarksville OPC EA".

Additionally, VA will publish the Draft EA online at http://www.cfm.va.gov/environmental/index.asp for a 30-day public review and comment period. The Notice of Availability of the Draft EA will be published in *The Leaf Chronicle*.