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# **DRAFT ENVIRONMENTAL ASSESSMENT Tennessee Veterans' Home, Cleveland Bradley County, Tennessee**



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**DRAFT ENVIRONMENTAL ASSESSMENT**  
**Tennessee Veterans' Home, Cleveland**  
**Bradley County, Tennessee**

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## EXECUTIVE SUMMARY

The purpose of the project is to provide military veterans more long term care services and facilities in this portion of the State of Tennessee. Efforts have been underway for a number of years to locate a state veterans' home in Cleveland/Bradley County, Tennessee. The need for the proposed project is demonstrated by the high numbers of veterans in the regional area of Tennessee and the number that will be in need of intermediate and skilled levels of nursing care in the near future. In 2007, there were 45,861 veterans in Bradley County and the surrounding counties of Hamilton, Polk, McMinn, Meigs, and Rhea. Veteran's population in the age group 65 to 84 is now 16,394. The number of veterans in that age group is expected to increase to 17,944 by 2014.

The conceptual veterans' home plan is for a 108-bed facility to be located on the approximate 30-acre tract of donated property at 1940 Westland Drive, on the south side of Cleveland, Tennessee. The veterans' home facility is proposed to be approximately 98,000 gross square feet. The actual facility, access roads, and parking footprint would occupy approximately 10 acres on the tract of donated property. The central portion of the property is the preferred location for the proposed facility based on the steep topography on the western end and site drainage issues, unsuitable foundation material, and potential settling issues on the eastern end.

Alternatives being considered include various site locations within the 30-acre tract of donated land, as well as the no-action alternative. Early in the planning process by Bradley County two other sites (Parker Street and Minnis Road) were considered for the veterans' home, but rejected from detailed consideration due to a combination of poor site conditions (both), inadequate size (both), poor access (both), extensive site preparation requirements (Minnis Road), high purchase cost (Parker Street), impacts to important environmental resources (Minnis Road), and high renovation costs (Parker Street).

The approximate 30-acre tract of land has been predominantly cleared and graded in approximately 2006 for a residential subdivision by the previous landowner; however, the subdivision development was never completed. The extent of the site earthwork included excavation of up to 10 feet deep in places and other areas on the eastern end receiving substantial fill. Gravel roadways and a drainage system, consisting of a stormwater/sediment detention pond, ditches, and buried corrugated metal pipe (36-inch). There is almost a mile of unpaved road network on the site along with an approximate 0.1-acre detention pond, with another similar size detention pond immediately adjacent to the south side of the property. Topography ranges from about 900 feet mean sea level (msl) near the northeast portion of the site up to about 1,175 feet msl along the western ridge at the site's western boundary. The property itself resembles disturbed old field habitat predominantly covered with various early successional herbaceous vegetation, with some stands of trees around the border of the property. A small stand of young planted pines is located along the north central border of the property. The site is located within the built-up area of Cleveland and South Cleveland, the surrounding area has been, and continues to develop with a mixture of residential housing (single family homes, apartments, and mobile home parks), churches, and businesses.

1 The proposed veterans' home site does not have any jurisdictional wetlands, designated  
2 floodplains, recorded cultural resources, recorded threatened/endangered species, or known  
3 hazardous materials. Therefore the proposed project would have no significant adverse impacts  
4 to these resource categories. The project has also been determined to have no significant impact  
5 on aesthetics, land use, air quality, geology, soils, hydrology, water quality, wildlife and habitat,  
6 noise, socioeconomic parameters (e.g., population, employment, income, protection of children,  
7 environmental justice), community services, transportation, or utilities. The projected impacts  
8 from construction and operation of the proposed veterans' home facility when viewed  
9 cumulatively with other impacts from continued residential and business site development in the  
10 project vicinity (Cleveland/South Cleveland area) would produce a cumulative series of minor  
11 localized negative impacts on the various natural resources of the area (e.g., air, soil, water, flora,  
12 fauna) as well as a cumulative series of minor beneficial impacts on socioeconomic effects such  
13 as local employment and income. Overall, there would be no significant adverse cumulative  
14 effects as the result of construction or operation of the proposed veterans' home facility.  
15 Beneficial impacts of the proposed project would be the increased jobs associated with  
16 construction and operation of the facility, along with meeting the need for additional care  
17 facilities for veterans in this area of Tennessee.

18

1 **1.0 INTRODUCTION**

2  
3 **1.1 Project Background**

4  
5 This Environmental Assessment (EA) is being prepared as required by the federal matching  
6 grant requirements and is in accordance with environmental regulations for compliance with the  
7 National Environmental Policy Act (NEPA). The NEPA regulations for the Department of  
8 Veterans Affairs are included in 38 Code of Federal Regulations (CFR) Part 26, "Environmental  
9 Effects of the Department of Veterans Affairs (VA) Actions." A project vicinity map for the  
10 proposed facility is provided on Figure 1. The EA is being prepared to address construction,  
11 operation, and maintenance of the veterans' home facility and associated structures.

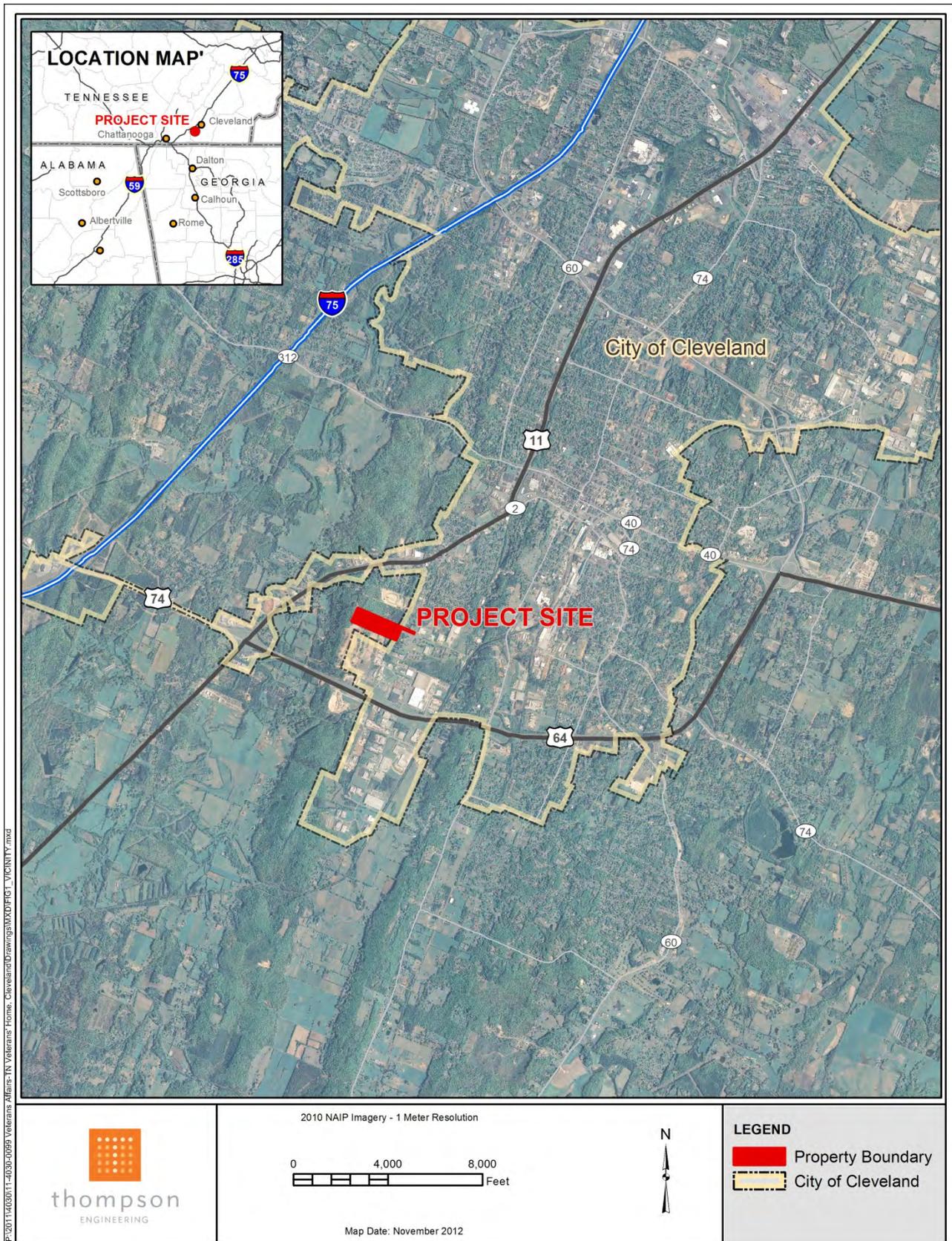
12  
13 The Tennessee General Assembly (1988) created the State Veterans' Homes Board, a body to  
14 establish and operate public homes within the state. These are known as "Tennessee State  
15 Veterans Homes." Construction of state veterans' homes, once approved, is funded at 65% by  
16 the federal government (VA) and 35% by state/local, plus the land must be donated. The current  
17 estimate for a facility such as proposed for Bradley County is about \$32 million.

18  
19 The Bradley County Commission and Cleveland City Council passed resolutions in 2003 in  
20 support of a local state veterans' home facility. The resolutions recognized that it would be a  
21 service to the veterans of this part of the state to have a veteran's home built in Bradley County.  
22 It would be more convenient for local veterans and their families while also providing more beds  
23 to alleviate a growing demand throughout the State of Tennessee.

24  
25 In late 2007, work began on a state resolution to support a VA home in southeast Tennessee.  
26 The result was passage of Tennessee House Resolution 531 on May 6, 2008. The resolution was  
27 sponsored by Representative Kevin Brooks to support the construction of a state veterans' home  
28 in Bradley County. The resolution passed 97 to 0. Another milestone was to file a formal  
29 application with the VA State Home Construction Program in Washington, D.C. That action  
30 was accomplished on April 15, 2008.

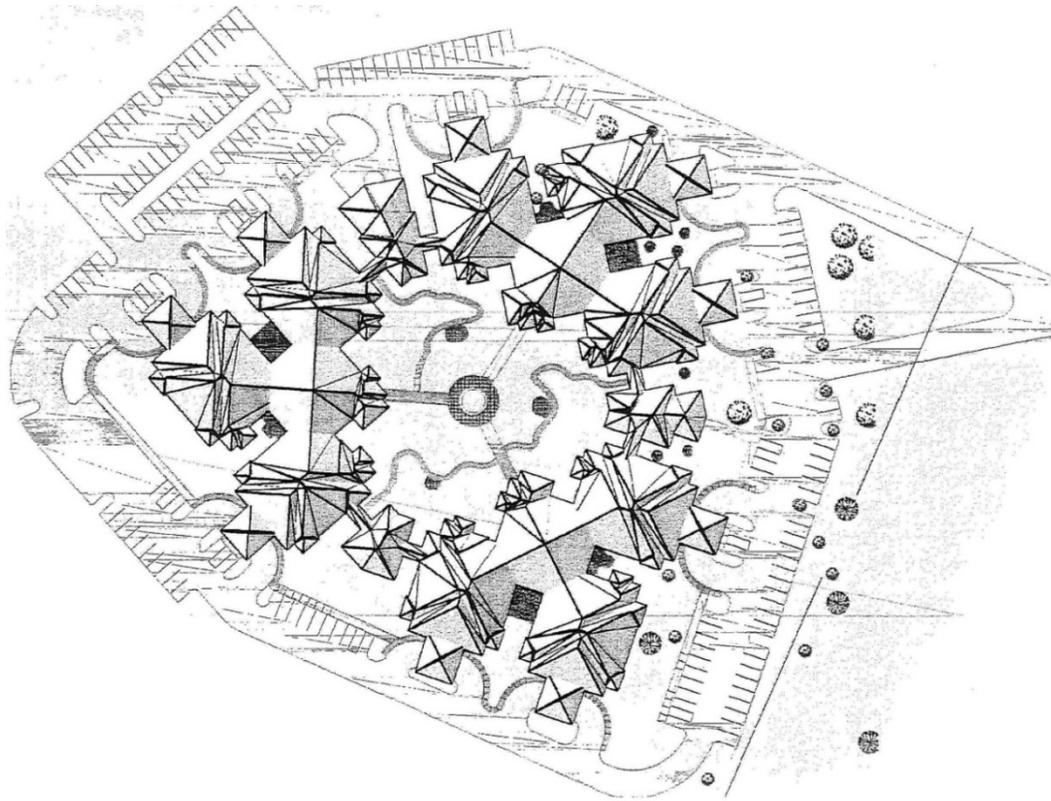
31  
32 County land at other locations is available to use for the proposed veterans' home; however in  
33 2010, a donor provided an approximate 30 acre tract of land at 1940 Westland Drive that is now  
34 the proposed site for the Tennessee Veterans' Home, Cleveland. Bradley County is also  
35 fortunate to have anonymous donors that wish to donate three million dollars for a home to be  
36 located here. This private donation of \$3 million can be applied toward the state/local 35%  
37 portion thus reducing the match from about \$11.2 million to around \$8.2 million.

38  
39 The conceptual veterans' home plan is for a 108-bed facility to be located on the approximate  
40 30-acre tract of donated property at 1940 Westland Drive, on the south side of Cleveland,  
41 Tennessee. The easternmost approximate 2.5 acres of this tract are within the City of Cleveland  
42 corporate limits, while the remaining approximate 25+ acres are in the unincorporated area of  
43 Bradley County. The veterans' home facility is proposed to be approximately 98,000 gross  
44 square feet, with a general site plan shown on Figure 2 and a conceptual ground-level view  
45 shown on Figure 3. The actual facility, access roads, and parking footprint would occupy  
46 approximately 10 acres of the donated property.



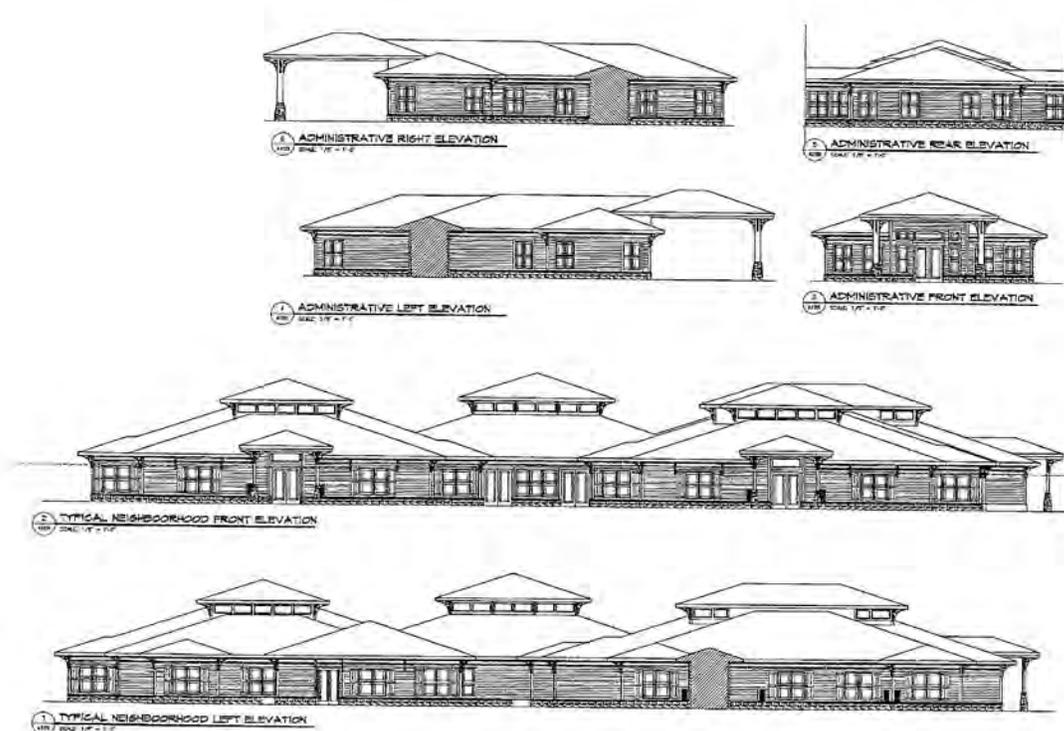
1  
 2

**Figure 1 Vicinity Map, Tennessee Veterans' Home, Cleveland**



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2

Figure 2 Conceptual Plan View, Tennessee Veterans' Home, Cleveland



3  
4

Figure 3 Conceptual Ground-Level View, Tennessee Veterans' Home, Cleveland

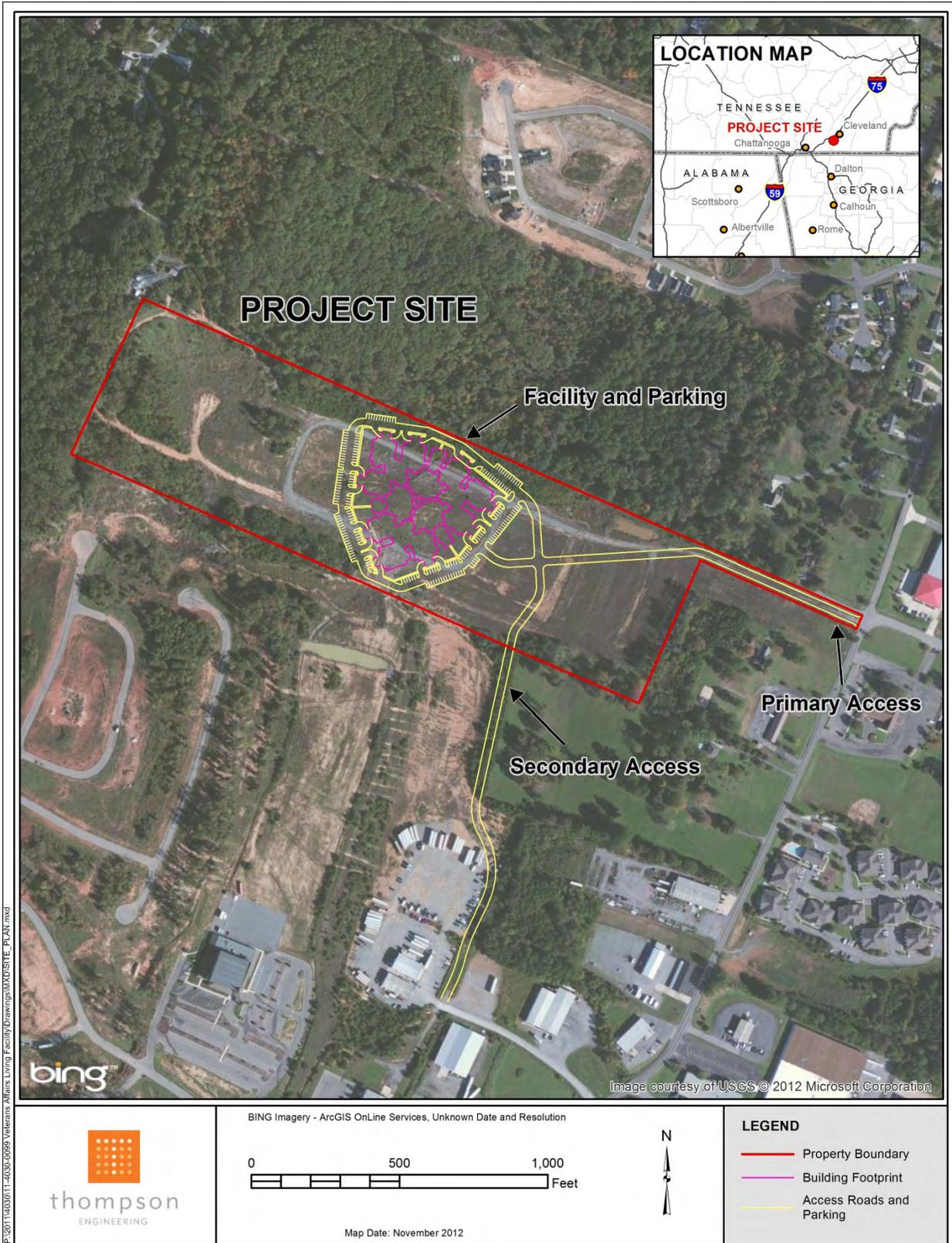
1  
2 Figure 4 displays an aerial photograph of the proposed project site with the preliminary site plan  
3 and Figure 5 depicts the topography of the site (USGS Topographic Map – South Cleveland  
4 Quadrangle). The central portion of the property is the preferred location for the proposed  
5 facility based on the steep topography of the western end and substantial fill and potential  
6 foundation settling issues on the eastern end. Ground level photographs (December 2011 and  
7 May 2012) show the current conditions on the site (Figures 6, 7, 8, and 9).

8  
9 Following completion of the NEPA process, the ownership of the selected property would  
10 transfer from the current owner (American Legion Post 81) to the State of Tennessee,  
11 Department of Veterans Affairs. The EA is being prepared to address construction, operation,  
12 and maintenance of the veterans' home facility and associated structures. The current schedule  
13 proposes construction of the facility in 2015-2016.

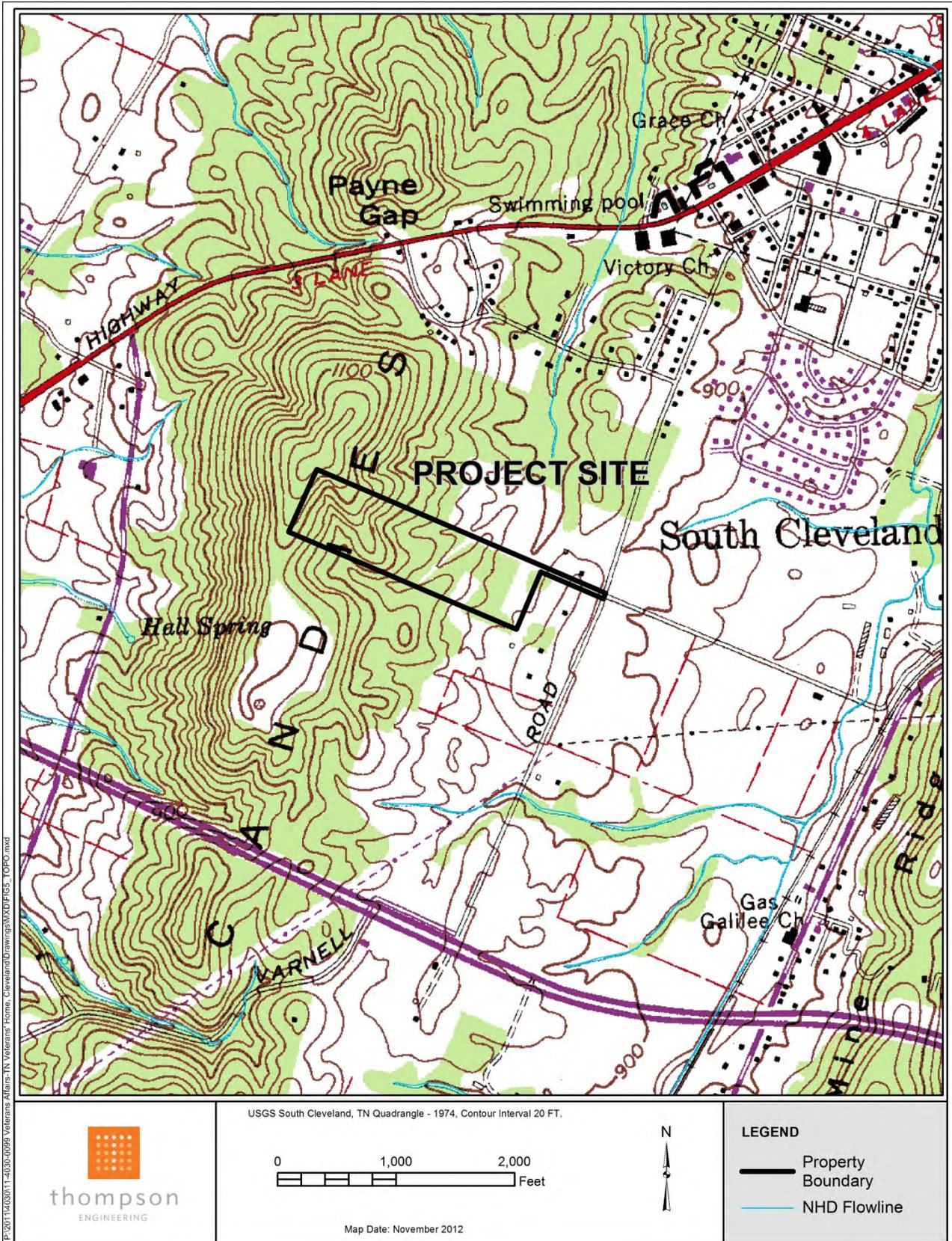
## 14 15 **1.2 Purpose and Need**

16  
17 The VA provides long term care services to veterans through three national programs: VA  
18 owned and operated homes, state veterans' homes owned and operated by the states, and the  
19 community home program where the VA contracts with local homes through VA Medical  
20 Centers. The purpose of the project is to provide more long term care services and facilities in  
21 this portion of the State of Tennessee. Efforts have been underway for a number of years to  
22 locate a state veterans' home in Cleveland/Bradley County, Tennessee. It is proposed to be a  
23 facility offering intermediate and skilled levels of nursing care to provide a home for Tennessee  
24 veterans who have honorably served our country and now are in need of long term care.

25  
26 The need for the proposed project is demonstrated by the high numbers of veterans in the  
27 regional area of Tennessee and the number that will be in need of intermediate and skilled levels  
28 of nursing care in the near future. In 2007, there were 45,861 veterans in Bradley County and  
29 the surrounding counties of Hamilton, Polk, McMinn, Meigs and Rhea. Veteran's population in  
30 the age group 65 to 84 is now 16,394. The number of veterans in that age group is expected to  
31 increase to 17,944 by 2014. There are currently three Tennessee State Veterans' Homes in  
32 operation; Murfreesboro (140-bed facility opened in 1991, located 132 miles from Cleveland),  
33 Humboldt (140-bed facility opened in 1996, located 304 miles from Cleveland) and Knoxville  
34 (140-bed facility opened in 2006, located 84 miles from Cleveland). The Tennessee State  
35 Veterans' Homes Board is responsible for operation of these facilities. These homes provide  
36 professional nursing care, social services and activities and rehabilitation services. A fourth  
37 home has been approved for northern Tennessee at Clarksville in Montgomery County (211  
38 miles from Cleveland). The current efforts for a home in Bradley County are spearheaded by the  
39 Southeast Tennessee Veterans' Home Council, as they are working diligently for this to be the  
40 location for a state home in this portion of Tennessee.



1  
 2 **Figure 4 Aerial Photograph and Preliminary Site Plan, Tennessee Veterans' Home,**  
 3 **Cleveland**



1  
2

Figure 5 Topographic Map, Tennessee Veterans' Home, Cleveland



1  
2

**Figure 6 Site Photograph, View Looking West from Westland Drive**



3  
4

**Figure 7 Site Photograph, View Looking West from Southeast Side of Site**



1  
2 **Figure 8 Site Photograph, Looking East from the Center of the Site**



3  
4 **Figure 9 Site Photograph, Looking East from West End of the Site near the Cell Tower**  
5

1 **2.0 ALTERNATIVES**

2  
3 **2.1 Development of Alternatives**

4  
5 Alternatives being considered include various site locations within the 30-acre tract of donated  
6 land, as well as the no-action alternative. Early in the planning process by Bradley County two  
7 other potential sites (Parker Street and Minnis Road) were considered for the veterans' home, but  
8 each have a number of negative issues including: poor site conditions (both), inadequate size  
9 (both), poor access (both), extensive site preparation requirements (Minnis Road), high purchase  
10 cost (Parker Street), impacts to important environmental resources (Minnis Road), and high  
11 renovation costs (Parker Street). The Parker Street site is an approximate 7-acre, privately-  
12 owned existing 3-story structure that was a uniform company and would require extensive  
13 renovation. It is located in the built-up urban area of Cleveland. The Minnis Road site is an  
14 approximate 14-acre, county-owned undeveloped area containing a natural stream. This site is  
15 located in the rural area of Bradley County northeast east of Cleveland. Based on the negative  
16 aspects of these two potential sites they have been eliminated from detailed consideration in this  
17 EA. The approximate 30-acre tract located at 1940 Westland Drive is the preferred location for  
18 the proposed veterans' home.

19  
20 **2.2 Alternatives Retained For Detailed Analysis**

21  
22 **2.2.1 Proposed Action Alternative**

23  
24 The proposed action alternative evaluated in this EA is to construct and operate a 108 bed  
25 veterans' home on the central portion of the donated 30-acre tract of land at 1940 Westland  
26 Drive, Cleveland, Tennessee. Since the footprint of the veterans' home facility, access roads,  
27 and parking is estimated to be 10 acres or less, there are options for where on the tract of land to  
28 site the project. Initially, the flat eastern portion of the site appeared to be the best suited for  
29 location of the facility; however, site geotechnical testing showed this area to have substantial fill  
30 material excavated from higher elevation portions of the site. Due to uncertainty on the potential  
31 for uneven settling of this material over time, as well as downslope drainage issues from the  
32 higher elevation portions of this tract and higher elevation lands being developed south of this  
33 property, it has been determined that the eastern end of the site is not best suited for the facility.  
34 Likewise consideration was given to the higher elevation western portion of the site. The slope  
35 of this western area, being approximately 200 feet higher than the east/central portion of the site,  
36 would require significant excavation to create a suitable level 10-acre site for the facility, access  
37 roads, and parking areas. Erosion and sediment control would be significantly more expensive  
38 for development on the steep sloped west end of the property. In addition, cost for construction  
39 and maintenance of longer access roads would increase the overall project cost. Therefore, the  
40 central portion of the 30-acre tract of land is the preferred location for the veterans' home.

41  
42 **2.2.2 No Action Alternative**

43  
44 The no action alternative evaluated in this EA, as required to be considered by NEPA  
45 regulations, is to not construct the proposed veterans' home at this location.

1 **3.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES OF**  
2 **THE PROPOSED ACTION AND NO ACTION ALTERNATIVES**

3  
4 **3.1 Aesthetics**

5  
6 **3.1.1 Affected Environment**  
7

8 The term aesthetics refers to the subjective visual perception of an area's natural beauty based on  
9 some qualitative scenic qualities. Factors typically included in a determination of aesthetic  
10 values include site characteristics such as topographic relief; prominence of water in the  
11 viewscape; type of vegetation present; diversity of scenery; level of human  
12 development/disturbance in the area; and presence/absence of any unique scenic features  
13 compared with surrounding land. The preferred portion of the approximate 30-acre site is  
14 visually screened from the east and west by ridges, and to the north by forest, and partially  
15 screened to the south by a band of trees except for an approximate 300-foot area bordering a  
16 private trucking facility (Classic Express, Incorporated) and the South Cleveland Church of God  
17 property. The visual aspects of the proposed site can be seen on the aerial photograph of the site  
18 (Figure 5) and ground-level photographs of the site (Figures 6-9).  
19

20 The proposed site exhibits a moderate level of aesthetic quality. Topography ranges from about  
21 900 feet mean sea level (msl) near the northeast portion of the site up to about 1,175 feet msl  
22 along the western ridge at the site's western boundary. There are no prominent natural scenic  
23 water features on the site, with the only water feature being a manmade sediment detention pond.  
24 The property itself resembles an old field habitat predominantly covered with various early  
25 successional herbaceous vegetation, with some stands of trees around the border of the property.  
26 Plant succession on this property has been slowed considerably by the previous excavation and  
27 fill on the site as it was being developed for a residential subdivision – basically exposing  
28 mineral soil with very little topsoil on the majority of the property. A small stand of young  
29 planted pines is located along the north central border of the property. Due to the open-field type  
30 habitat on the site, there is a rather low diversity of scenic elements, with no major unique  
31 features found on the proposed project site. With the site being located within the built-up area  
32 of Cleveland and South Cleveland, the surrounding area has been, and continues to develop with  
33 a mixture of residential housing (single family homes and apartments along Westland Drive),  
34 churches, and businesses. The residential properties range from older homes (estimated 20-50  
35 years old) with larger lots to new large residential subdivisions located immediately to the  
36 southwest (Emerald Hills), and another (The Orchard) about 500 feet north of the project site  
37 (both of these subdivisions only have a few homes in them, although the road and utility  
38 networks have been completed for several years).  
39

40 **3.1.2 Environmental Consequences of the Proposed Action**  
41

42 The proposed action would create minor aesthetic degradation during the construction phase of  
43 the facility; however, those effects would be short-term. As the construction is completed and  
44 landscaping established around the facility, those minor aesthetic effects would diminish and the  
45 facility would blend into the residential, business, and church structural setting of this suburban  
46 area. The facility and landscaping would create a positive aesthetic improvement for the area.

1 Facility design planning will strive to blend functional elements such as detention/retention  
2 ponds into an attractive landscape.

### 3.1.3 Environmental Consequences of the No Action Alternative

6 The no action alternative would have no impacts on the aesthetics of the project area.

## 3.2 Air Quality

### 3.2.1 Affected Environment

12 The project location in Bradley County is currently classified as an attainment area in accordance  
13 with the National Ambient Air Quality Standards, and the Final Designations for Ozone, Region 4,  
14 U.S. Environmental Protection Agency (EPA), and April 2012. Therefore, the general conformity  
15 roles would not apply. General conformity applies only to an action in a nonattainment area. The  
16 air quality of the Cleveland/Bradley County area is classified as good based on the Air Quality  
17 Index (AQI) according to EPA data. The AQI for Bradley County has trended downward from a  
18 high of 64 in 1999 to 42 in 2009 (good rating for 0-50, and moderate rating from 51-100).  
19 Likewise the air quality constituents of total suspended particulates, lead, carbon monoxide, sulfur  
20 dioxide, nitrogen dioxide, ozone, particulate matter (10 micrometers or less), and particulate  
21 matter (2.5 micrometers or less) have trended downward (better air quality) over the period from  
22 1999 to 2009.

### 3.2.2 Environmental Consequences of the Proposed Action

26 During project construction minor short-term degradation of local air quality would occur as dust  
27 and other particulates would be suspended by construction equipment. Also emissions from gas  
28 or diesel powered equipment would occur during the construction period. Both of these minor  
29 air pollution sources would be reduced after construction is completed. The EPA recommends  
30 that project construction equipment include measures to reduce diesel emissions such as  
31 switching to cleaner fuels, retrofitting current equipment with emission reduction technologies,  
32 exchanging older engines with newer cleaner engines, replacing older vehicles, and reduction of  
33 idling through operator training and/or contracting policies (EPA letter dated March 1, 2012,  
34 copy in Appendix B)

36 During operation of the facility minor air emissions would occur as automobiles and service  
37 vehicles visit the facility, and from operation of gasoline-powered lawn maintenance equipment.  
38 There are no incinerators planned for the facility. There would be minor emissions from an  
39 emergency diesel generator during its periodic testing and operation, as well as minor emissions  
40 from possible natural gas devices that may be installed such as stoves, hot water heaters, clothes  
41 dryers, and heating units. Consideration of electric appliances and geothermal energy on the site  
42 will be explored during the detailed design of the facility.

1                   **3.2.3 Environmental Consequences of the No Action Alternative**  
2

3 The no action alternative would have no impacts on air quality, with the air quality conditions  
4 being affected by other local and regional sources of air pollution.  
5

6                   **3.3 Cultural Resources**  
7

8                   **3.3.1 Affected Environment**  
9

10 Panamerican Consultants, Incorporated performed a Cultural Resources Desktop Review  
11 (January 25, 2012), noting that no standing structures were on the approximate 30-acre tract of  
12 land (copy in Appendix B). A two-mile radius around the proposed project tract of land was  
13 checked for previously recorded archaeological sites in the Tennessee Division of Archaeology  
14 files. No previously recorded archaeological sites are recorded for this tract of property. Within  
15 the two-mile search radius there are eight sites. The nearest of these to the proposed project are  
16 Fort McPherson, a Civil War redoubt, and a Civil War encampment. Both sites are on the high  
17 ridges to the east of the project location. Other sites include the Minor Site, a potentially eligible  
18 stratified Woodland and Mississippian site on a terrace of Candies Creek; the Hair Conrad  
19 Farmstead, a restored early 19<sup>th</sup> century Cherokee Farmstead located on the Blythwood Farm; an  
20 Internment Center for Cherokees used in 1838; a late Archaic and Mississippian open habitation  
21 on a terrace of Candies Creek; Trail of Tears Bell's Route, Bradley County Segment; and an  
22 early 19<sup>th</sup> century homestead.  
23

24 The proposed veterans' home site was cleared and graded in approximately 2006 for a residential  
25 subdivision; however, the development was never completed. The extent of the site earthwork  
26 can be seen on Figures 6 - 9, with some areas being excavated up to 10 feet deep and other areas  
27 receiving substantial fill (eastern end of the property). Gravel roadways and a drainage system,  
28 consisting of sediment detention ponds, ditches, and buried corrugated metal pipe (36-inch) were  
29 completed on the site and the immediately adjoining property to the south.  
30

31                   **3.3.2 Environmental Consequences of the Proposed Action**  
32

33 This information has been coordinated with the Tennessee Division of Archaeology (January 27,  
34 2012 letter). A reply was received from that agency on February 1, 2012, summarizing that there  
35 are no National Register of Historic Places listed or eligible properties affected by this project  
36 and they have no objections to proceeding with the project (copy in Appendix B).  
37

38 In addition, this information has been provided to appropriate Native American Tribes for their  
39 review and comment. The Cherokee Nation responded by email on April 9, 2012 stating that  
40 they have no knowledge of any historic, cultural, or sacred sites within the affected area, but  
41 requested that if ground disturbance reveals an archaeological site or human remains that work  
42 cease and the tribe plus other appropriate agencies be contacted immediately.  
43

44                   **3.3.3 Environmental Consequences of the No Action Alternative**  
45

46 The no action plan would have no adverse impacts on cultural resources.

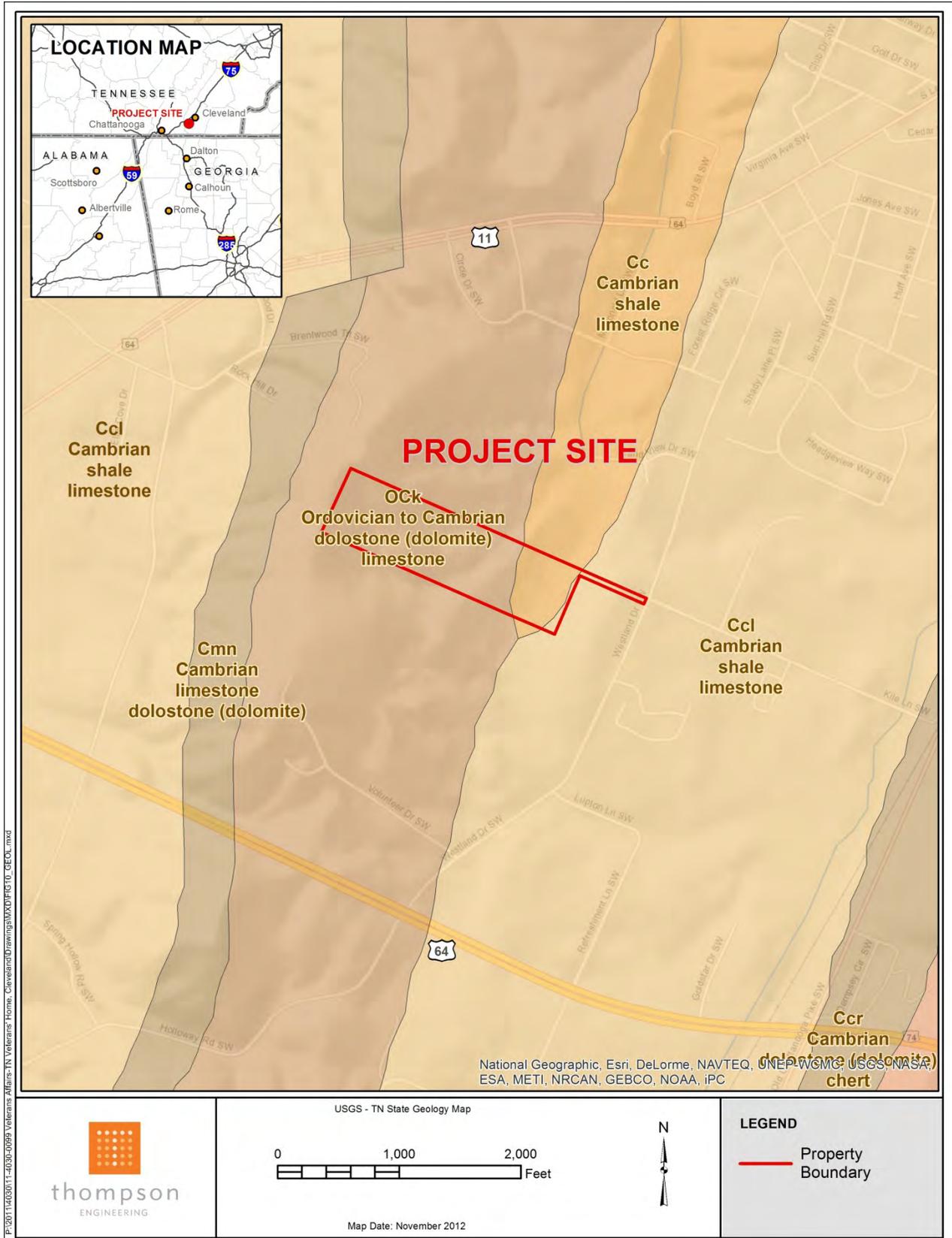
### 3.4 Geology, Topography, and Soils

#### 3.4.1 Affected Environment

All of Bradley County is within the Valley and Ridge province of the Appalachian Region. The Valley and Ridge province is underlain by bedrock that has been folded and faulted, resulting in rock layers that dip steeply. Rock beds that are more resistant to weathering form long, linear ridges and the less resistant rock beds underly the valleys. The site is on the eastern slope of Candies Creek Ridge. The bedrock underlying the site is identified as the Knox group. The Knox group consists of limestone and dolomite that weathers to cherty clay. The overburden ranges from 10 to 40 feet thick. The entrance road and the eastern portion of the site are underlain by bedrock of the Conasauga Group. The Conasauga Group consists of shale and limestone. The overburden is typically less than 20 feet thick. Based on the Tennessee State Geologic Map, the project site contains three formations: Ordovician to Cambrian dolostone (dolomite) limestone (approximate western 75 percent of the site); Cambrian shale limestone (designated Cc); and Cambrian shale limestone (designated Ccl), on the remaining eastern portion of the site. Figure 10 shows the geology of the area within approximately one mile of the proposed site. Limestone is the only commercially mined mineral in Bradley County (Cleveland/Bradley Chamber of Commerce, 2004). Elevations range from approximately 900 feet msl on the east to near 1,175 feet msl on the western ridge.

Based on the Natural Resources Conservation Service's Web Soil Survey (2012), the soils on the proposed site are well drained and include (including map soil unit symbol two letter designations):

- **Cb and CC**-Clarksville cherty silt loam, eroded hilly phase (0.7 percent of site) and eroded rolling phase (4.1 percent of site), respectively. These soils are gravelly silt loam and very gravelly silty clay formed from gravelly colluvium over gravelly residuum weathered from cherty limestone. These somewhat excessively drained soils are found on the sides and summits of ridges. These soils are located in a narrow band near the center of the site.
- **Co**-Cotaco silt loam (8.8 percent of site). This soil is silt loam and silty clay loam formed from loamy alluvium derived from sandstone and shale. These somewhat poorly drained soils are found in drainage ways. Bedrock is typically found from 24 to 84 inches deep and the seasonal high water table is typically from 18 to 30 inches below the ground surface. This soil is located in the low drainage way near the east end of the main site.
- **Fd, Fe, Ff, Fg, and Fh**-Fullerton cherty silt loam, eroded hilly phase (6.4 percent of site); Fullerton cherty silt loam, eroded rolling phase (1.6 percent of site); Fullerton cherty silty clay loam, severely eroded steep phase (44.3 percent of site); Fullerton cherty silt loam, hilly phase (3.3 percent of site); Fullerton cherty silt loam, rolling phase (4.4 percent of site), respectively. These soils are clayey residuum weathered from cherty limestone. These well-drained soils are found on ridges. Fullerton soils make up more than 50 percent of the site and are located from the center to the west end of the site.



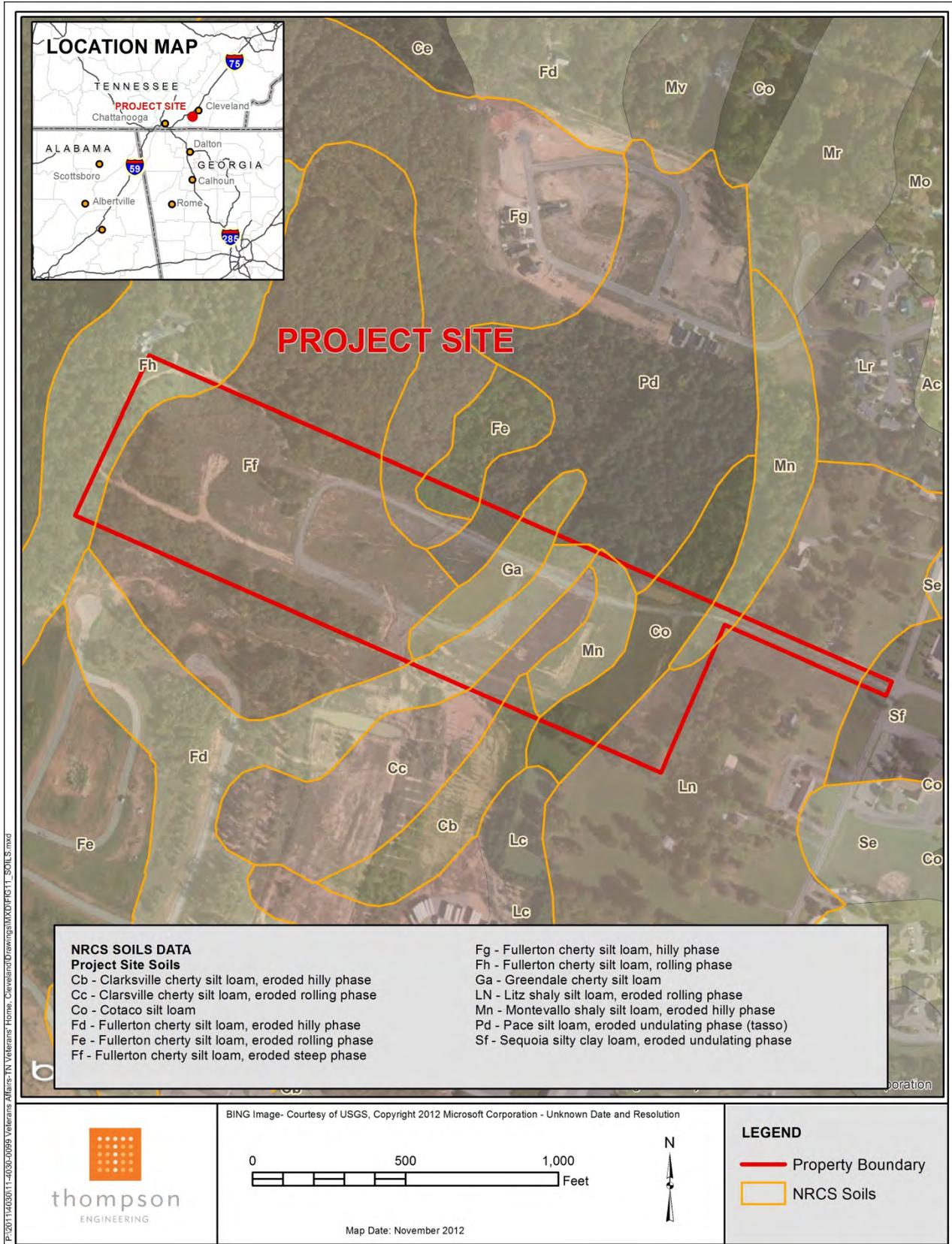
1  
 2 **Figure 10 Area Geology, Tennessee Veterans' Home, Cleveland**

- 1 • **Ga**-Greendale cherty silt loam (6.0 percent of site). This soil is gravelly silt loam formed  
2 from loamy alluvium derived from limestone, sandstone, and shale. This well-drained  
3 soil is found in alluvial fans and drainage ways. The seasonal high water table is  
4 typically from 60 to 72 inches below the ground surface. This soil is located in a  
5 narrow band near the center of the site.
- 6 • **Ln**-Litz shaly silt loam, eroded rolling phase (7.5 percent of site). This soil is silt loam  
7 and silty clay loam derived from residuum weathered from shale. These well-drained  
8 soils are found near the foot of hill slopes. The depth to bedrock is 20 to 40 inches.  
9 This soil is located under most of the entrance road.
- 10 • **Mn**-Montevallo shaly silt loam, eroded hilly phase (8.0 percent of site). This soil is silt  
11 loam derived from residuum weathered from shale. These well-drained soils are found  
12 on the back slopes of hills. The depth to bedrock is 10 to 20 inches. This soil is  
13 located in the low drainage way near the east end of the main site.
- 14 • **Pd**-Pace silt loam, eroded undulating phase [tasso] (4.3 percent of site). This soil is silt  
15 loam, silty clay loam, and clay loam formed from loamy colluvium or alluvium  
16 over residuum weathered from limestone. These well-drained soils are found on foot  
17 slopes of ridges. The depth to hardpan is 14 to 36 inches. The seasonal high water  
18 table is 15 to 22 inches below the ground surface. This soil is located near the north side  
19 of the site, near the center.
- 20 • **Sf**-Sequoia silty clay loam, eroded undulating phase (0.6 percent of site). This soil is  
21 silty clay loam and silty clay derived from clayey residuum weathered from shale. This  
22 well-drained soil is found on the shoulder and slope of hills. The depth to bedrock is 20  
23 to 40 inches. This soil is located only at the east end of the entrance road, near  
24 Westland Drive.

25  
26 Figure 11 shows the soil types found on the proposed site. None of these soil units meets the  
27 hydric soil criteria. The topographic map for the site and the vicinity were reviewed to see if  
28 there are any existing sinkholes in the area. The topography does not suggest any, and this is  
29 consistent with the site reconnaissance. The likelihood of encountering sinkholes or  
30 development of a sinkhole at the site is low (Bradley County/Cleveland, 2012).

31  
32 The topography, drainage, and soils were impacted on the 30-acre site in about 2006, as the  
33 previous landowner cleared and leveled a large portion of the area for a residential subdivision.  
34 In particular the eastern half of the tract was subject to mechanical cut and fill operations;  
35 however, these activities have exposed mineral subsoil over most of the property, with very few  
36 areas having a good topsoil layer.

37  
38 Seismic activity in Bradley County is slightly above the Tennessee state average and is 56  
39 percent smaller than the overall U.S. average. The site is located within an area with moderate  
40 risk of seismic damage. The largest earthquake in recent history occurred on April 29, 2003,  
41 registering 4.9, with an epicenter located about 64 miles from the county center. Information  
42 from the USGS Geologic Hazards Science Center's 2009 Earthquake Probability Mapping  
43 Model shows a 3 to 4 percent probability of a > 5.0 magnitude earthquake over the next 25 years  
44 and zero probability for > 6.0 and > 7.0 magnitude over the same time period. Considering a 50  
45 year period the model shows a 4 to 6 percent probability for a >5.0 magnitude; 1 to 2 percent for  
46 a > 6 percent magnitude; and zero probability for > 7.0 magnitude earthquake.



1  
2

Figure 11 Area Soils, Tennessee Veterans' Home, Cleveland

1 In coordination with the U.S. Department of Agriculture, Natural Resources Conservation  
2 Service (NRCS), the site was evaluated with regards to the Farmland Protection Policy Act  
3 procedures. The proposed project site is located within the Census Designated Places (CDP) of  
4 Cleveland and South Cleveland, Tennessee. Such designations are classified as an “urbanized  
5 areas” and are exempt from this Act.  
6

7 In February 2012, a series of 10 geotechnical borings were taken to explore subsurface  
8 conditions (Bradley County/Cleveland Veterans Affairs Service Office, 2012). The depth of the  
9 borings was 20 feet or to the point of auger refusal. The previous site excavation and fill activity  
10 associated with a previous planned residential development in 2006 has affected the soil  
11 characteristics across the site. The only topsoil encountered on the site was a thin layer on the  
12 east end of the site. No groundwater was encountered at any of the 10 boring sites. Fill material  
13 was encountered in depths of 3.5 to 13.5 feet at the five easternmost boring sites (encompassing  
14 the eastern half of the property). The presence of this fill material on the eastern half of the site  
15 and potential settlement process could be problematic if the facility were located in this area,  
16 compared with the more stable western portion of the site. However, the steeper slopes of the  
17 western half of the site and the required site preparation work could also be an issue for erosion  
18 control and sedimentation.  
19

### 20 **3.4.2 Environmental Consequences of the Proposed Action**

21  
22 Due to the site soil disturbance in approximately 2006 by the previous landowner, minor  
23 additional disturbance would be required on approximately 10 acres of the 30-acre tract for site  
24 preparation of the veterans' home, access roads, and parking facilities. The potential for such  
25 erosion issues could be higher should the facility be located on the steeper western portion of the  
26 site in order to avoid the settlement and drainage issues associated with the existing fill material  
27 layer on the eastern portion of the site. Additional impacts will also occur to soils for access road  
28 construction, but these impacts will be minor and localized. Soil erosion BMPs will be  
29 implemented to control stormwater runoff and reduce soil erosion from the site in accordance  
30 with appropriate laws and regulations.  
31

### 32 **3.4.3 Environmental Consequences of the No Action Alternative**

33  
34 Under the no action alternative minor soil erosion would continue to occur due to the site  
35 clearing and excavation/fill activities by the previous landowner. As the site undergoes  
36 revegetation the soil erosion impacts would decrease proportionately with the increase in  
37 groundcover vegetation.  
38

## 39 **3.5 Hydrology and Water Quality**

### 40 **3.5.1 Affected Environment**

41  
42  
43 There are no streams on the proposed project site. The proposed site is within the Tennessee  
44 River Basin. Drainage from the 30-acre site flows northward along ephemeral drains off-site,  
45 culverts, and detention ponds for approximately 900 feet to an unnamed “blue-line” stream on  
46 the USGS topographic map (shown on Figure 5). That unnamed stream continues off-site north

1 approximately 8,400 feet through numerous culverts and detention/retention pond structures to  
2 Beech Spring Branch, then flows westward about 3,150 feet to Candies Creek, then flows  
3 northward approximately 17 miles to the Hiwassee River impounded arm of Chickamauga Lake.  
4

### 5 **3.5.2 Environmental Consequences of the Proposed Action**

6

7 Runoff from the site during construction will consist of sheet flow into ditches and drains that  
8 were constructed on the 30-acre tract by the previous landowner in about 2006. That flow from  
9 upslope on the site feeds into a detention pond located near the northeast portion of the property.  
10 Construction at the site will require a National Pollutant Discharge Elimination System (NPDES)  
11 construction permit and development of a Stormwater Pollution Prevention Plan (SWPPP).  
12 Installation and maintenance of these and additional BMPs will reduce any adverse impacts to  
13 hydrology and water quality downstream from the proposed project site. Following construction  
14 and stabilization of the site, as more groundcover vegetation is established, the effects on  
15 hydrology and water quality will become even more diminished. Prior to initiation of any  
16 construction, local land disturbance and state construction stormwater permit(s) will be acquired.  
17

### 18 **3.5.3 Environmental Consequences of the No Action Alternative**

19

20 The hydrology and water quality on the site and downstream as a result of the no action  
21 alternative would remain unchanged from the current pre-project conditions. Assuming no  
22 further site disturbance the hydrology and water quality would improve as more groundcover and  
23 tree cover become established.  
24

## 25 **3.6 Wildlife and Habitat**

26

### 27 **3.6.1 Vegetation**

28

#### 29 **3.6.1.1 Affected Environment**

30

31 Vegetation on the 30-acre tract of land is dominated by early successional herbaceous plants  
32 (grasses and forbs) that have established since the clearing, excavation, and fill activities in 2006  
33 by the previous landowner. A biologist performed a floral survey of the property on May 1-2,  
34 2012. Broomsedge (*Andropogon* species), brambles (*Rubus* species), ragweed (*Ambrosia* spp.),  
35 goldenrod (*Solidago* spp.), dandelion (*Taraxacum officinale*), dogfennel (*Eupatorium*  
36 *capillifolium*), American pokeweed (*Phytolacca americana*), Johnsongrass (*Sorghum halepense*),  
37 fescue (*Festuca* spp.), and lespedeza (*Lespedeza cuneata*), poison ivy (*Toxicodendron radicans*),  
38 Japanese honeysuckle (*Lonicera japonica*), and various other grasses and forbs are among the  
39 dominant herbaceous and groundcover plants. Dominant shrubs and tree seedlings on the  
40 property include Chinese privet (*Ligustrum sinense*), winged sumac (*Rhus copallinum*), staghorn  
41 sumac (*Rhus typhina*), wild plum (*Prunus americana*), box elder (*Acer negundo*), sassafras  
42 (*Sassafras albidum*), Bradford pear (*Pyrus calleryana*), and wild blueberry (*Vaccinium* spp.). A  
43 few young loblolly pines (*Pinus taeda*) are also growing in the lower eastern portion of the site.  
44 A narrow band of trees exist in a patch in the western center of the property and on the perimeter  
45 of the site, particularly along the northern and western edge of the site. These trees consist of a  
46 mixture of medium age hardwoods, with some pines mixed in. Tree species found in these areas

1 include sweetgum (*Liquidambar styraciflua*), sycamore (*Platanus occidentalis*), black locust  
2 (*Robinia pseudoacacia*), redbud (*Cercis canadensis*), eastern red cedar (*Juniperus virginiana*),  
3 common persimmon (*Diospyros virginiana*), red maple (*Acer rubrum*), mimosa (*Albizia*  
4 *julibrissin*), southern red oak (*Quercus falcata*) and white oak (*Q. alba*). Also, an approximate  
5 2-acre stand of young (less than 10 years old) planted Virginia pine (*Pinus virginiana*) exists  
6 along the north central edge of the property. Virginia pine is also scattered elsewhere on the  
7 property.  
8

### 9 **3.6.1.2 Environmental Consequences of the Proposed Action**

10  
11 The proposed veterans' home facility would be located in the large open area; therefore,  
12 minimizing adverse impacts on vegetation on the 30-acre tract of land. Few if any trees would  
13 have to be removed for the facility, associated parking, or the access roads. Tree and shrub  
14 plantings at the facility and along access roads will consider native species and selection of  
15 species conducive for the disturbed soil conditions that exists onsite.  
16

### 17 **3.6.1.3 Environmental Consequences of the No Action Alternative**

18  
19 The no action alternative would have no effects on vegetation on the site.  
20

## 21 **3.6.2 Fish and Wildlife**

### 22 **3.6.2.1 Affected Environment**

23  
24  
25 No natural aquatic environments exist on the site, but some of the drainage ditches and the  
26 sediment detention pond constructed in approximately 2006 do provide some manmade aquatic  
27 habitat. Due to the ephemeral nature of the ditch-like aquatic environment, and the highly  
28 dynamic fluctuations of the detention pond, no significant aquatic biota exists on the proposed  
29 30-acre tract of land. Wildlife on the site consists of species tolerant of the developing urban  
30 growth of the area, although the May 1-2, 2012 site inspection revealed the presence of white-tail  
31 deer (*Odocoileus virginianus*), cottontail rabbit (*Sylvilagus floridanus*), and wild turkey  
32 (*Meleagris gallopavo*) on the property. A limited number of reptile, amphibian, bird, and  
33 mammal species that prefer open field habitat exist on those portions of the site, while species  
34 preferring forest habitat are found in the limited areas of the site having tree cover.  
35

### 36 **3.6.2.2 Environmental Consequences of the Proposed Action**

37  
38 Due to the previous site disturbance from clearing, excavation, and fill activities, and the urban  
39 growth surrounding the site, no significant adverse impacts would occur on fish and wildlife  
40 resources.  
41

### 42 **3.6.2.3 Environmental Consequences of the No Action Alternative**

43  
44 The no action alternative would have no impacts on fish and wildlife resources.  
45  
46

1           **3.6.3 Threatened or Endangered Species**

2  
3           **3.6.3.1 Affected Environment**

4  
5 Based on review of the Tennessee Natural Heritage Database, no rare species have been  
6 previously observed within one mile of the project site (Tennessee Department of Environment  
7 and Conservation, 2012, and Tennessee Wildlife Resources Agency, 2012). Copies of these  
8 letters are found in Appendix B.

9  
10 The U.S. Fish and Wildlife Service (USFWS) provided information that indicates that suitable  
11 roosting habitat for the federally endangered Indiana bat (*Myotis sodalis*) may exist within the  
12 project area (USFWS, 2012). A copy of this letter is found in Appendix B. Suitable summer  
13 habitat for this species includes trees, snags, and similar structures. Specifically, trees greater  
14 than five inches in diameter at breast height that have exfoliating bark, crevices, or other similar  
15 characteristics could serve as suitable summer roosting habitat.

16  
17           **3.6.3.2 Environmental Consequences of the Proposed Action**

18  
19 Based on the May 1-2, 2012 site inspection by a biologist (see floral survey in paragraph 3.6.1.1)  
20 and the open-field type habitat where the proposed veterans' home would be located, the  
21 proposed action would have no effect on the Indiana bat or other state or federally listed plant or  
22 animal species or their critical habitats. The field inspection revealed no large trees in the  
23 preferred central portion of the property where the facility would be constructed. Some small  
24 trees (predominantly young Virginia pine, black locust, sweetgum, and eastern red cedar) would  
25 be cut for the secondary access road to the south, but these trees are less than 5 inches diameter  
26 and do not possess exfoliating bark.

27  
28           **3.6.3.3 Environmental Consequences of the No Action Alternative**

29  
30 The no action alternative would have no effect on any endangered or threatened species.

31  
32       **3.7 Noise**

33  
34           **3.7.1 Affected Environment**

35  
36 The noise environment at the proposed site of the veterans' home in Bradley County is primarily  
37 influenced by vehicular traffic and noise from adjacent residences, churches, and businesses.  
38 The site is somewhat buffered from these noise sources on the north, east and west sides by  
39 topography (east and west) and forest vegetation buffer (north). The businesses located to the  
40 south, particularly the Classic Express trucking company, produces vehicular noise that reaches  
41 the proposed site, although the site inspections on May 1-2, 2012 (during the weekday normal  
42 working hours) observed the noise level to be minor and attenuates rapidly as you move north  
43 from the trucking business to the property at 1940 Westland Drive.

1           **3.7.2 Environmental Consequences of the Proposed Action**  
2

3 Construction of the veterans' home on the proposed site would temporarily increase the noise  
4 level during the construction period due to operation of typical construction equipment. This  
5 type of noise is not unusual for this area of growth in South Cleveland as businesses and  
6 residential housing construction continues. Construction noise typically occurs on weekdays  
7 during daylight hours. During the operation of the veterans home at this site there would minor  
8 noise generated by operation of heating/cooling machinery, landscaping equipment, and vehicles  
9 entering and leaving the site. None of the construction or operation noise levels are deemed to be  
10 significant in terms of intensity or duration.

11           **3.7.3 Environmental Consequences of the No Action Alternative**  
12

13  
14 Implementation of the no action alternative would have no effect on noise levels.  
15

16           **3.8 Land Use**  
17

18           **3.8.1 Affected Environment**  
19

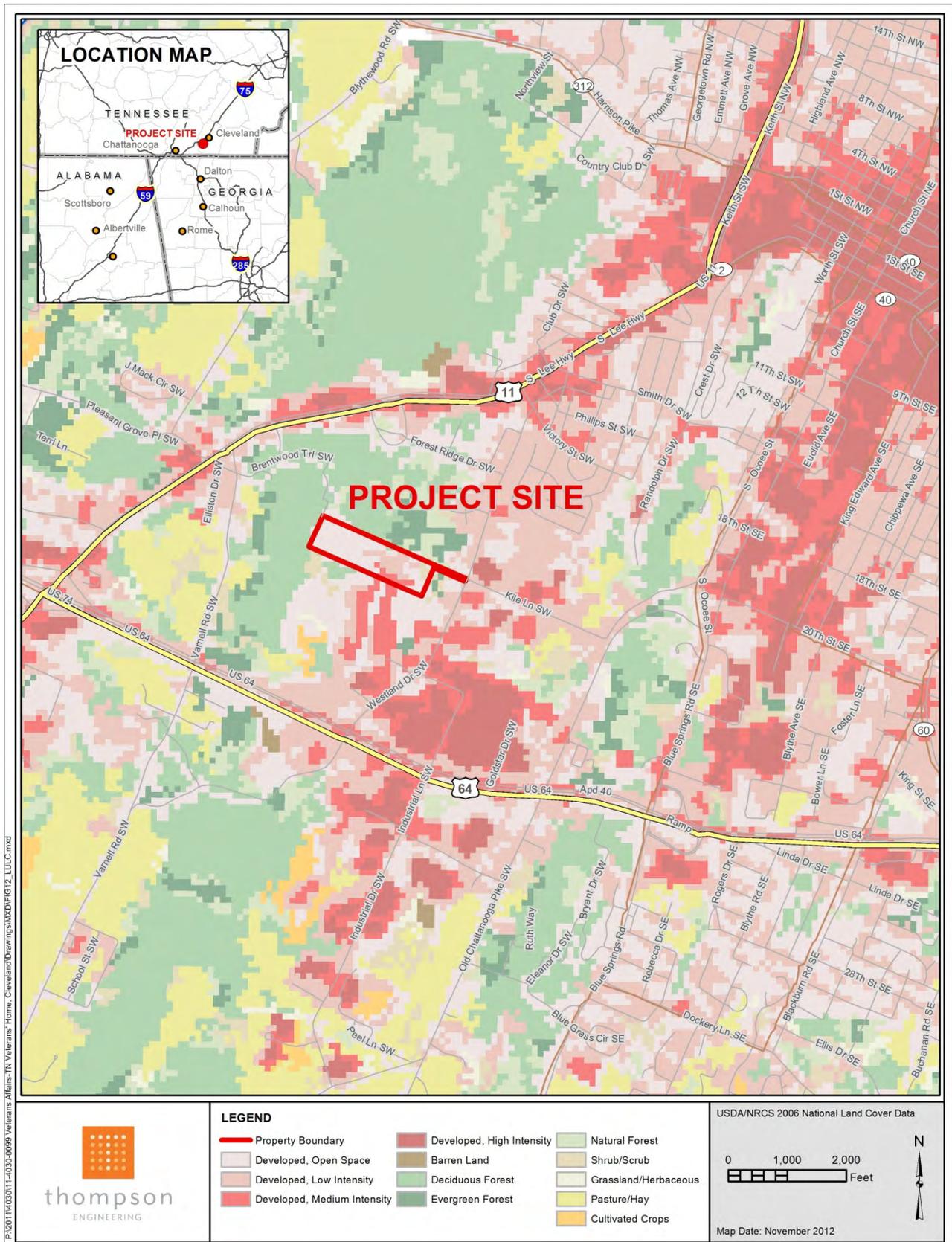
20 The small portion of the site within the Cleveland city limits is zoned as Light Industrial, while  
21 the majority of the site, in unincorporated Bradley County, is zoned as Rural Residential, with  
22 the westernmost approximate 8.6 acre area zoned as High Density Residential. The approximate  
23 30-acre tract of land has been predominantly cleared and graded in approximately 2006 for a  
24 residential subdivision; however, the site development was never completed. The majority of  
25 the site currently resembles an open field habitat with almost a mile of unpaved road network and  
26 sediment detention pond, with a few acres trees (mixed pine and hardwood) around the perimeter  
27 of the site. Figure 12 shows the land use/cover of the area within about one mile of the proposed  
28 site.  
29

30           **3.8.2 Environmental Consequences of the Proposed Action**  
31

32 Construction of the proposed veterans' home and associated facilities would result in a minor  
33 change in land use from the current old field habitat to the veterans' home structure, landscaping  
34 around the structure, paved parking facilities, and paved access roads from Westland Drive.  
35 These changes would be minor and not unusual for this area of residential and business growth in  
36 South Cleveland.  
37

38           **3.8.3 Environmental Consequences of the No Action Alternative**  
39

40 No impacts would occur on land use or land cover with the no action alternative. Over time, the  
41 site would ultimately reforest, however, the timeframe would be slowed due to the soil  
42 disturbance by the excavation and fill that had previously occurred on the site in about 2006.  
43



1  
2

Figure 12 Area Land Cover, Tennessee Veterans' Home, Cleveland

### 3.9 Floodplains, Wetlands, and Coastal Zone Management

#### 3.9.1 Affected Environment

Based on the National Flood Insurance Program (Map Number 47011C0138B) none of the 30-acre proposed site is within the 100 year floodplain.

According to the National Wetlands Inventory there are no wetlands on the proposed site (the nearest wetland is a small manmade pond on adjacent private property about 250 feet north of the site). As mentioned above, there is a small sediment detention pond constructed on the northeast portion of the site, and some small patches of cattails (*Typha* species) have established around a portion of this pond and a nearby ditch. Also, a small ponded area on part of the eastern boundary of the property was created when this eastern portion of the site received fill material when it was being developed for a residential subdivision. Neither of these areas would be affected by construction or operation of the proposed veterans' home facility, access roads, or parking areas. The proposed project was coordinated with the Regulatory Branch of the U.S. Army Corps of Engineers, Nashville District by letter on January 25, 2012. The Corps responded by letter on January 30, 2012, that their review of the project information indicated that no work would involve waters of the United States; therefore, a Department of Army permit would not be required (copy of letter in Appendix B).

The proposed project is not located in a coastal area, hence not regulated by coastal zone management regulations.

#### 3.9.2 Environmental Consequences of the Proposed Action

Based on the information contained in the previous paragraph, the proposed action would not affect floodplains, wetlands, or the coastal zone.

#### 3.9.3 Environmental Consequences of the No Action Alternative

The no action alternative would not affect floodplains, wetlands, or the coastal zone.

### 3.10 Socioeconomics

#### 3.10.1 Population

##### 3.10.1.1 Affected Environment

The population of Bradley County based on the 2010 census was 98,963, an increase of 12.5 percent from the 2000 census total of 87,959 (U.S. Bureau of Census website, 2012). Based on the City-Data Forum website (2012), the county has 297 people per square mile and is considered 66 percent urban and 34 percent rural. This compares to the population of the State of Tennessee in 2010 of 6,346,105, which showed an increase of 11.5 percent from the 2000 census total of 5,689,276.

1                   **3.10.1.2 Environmental Consequences of the Proposed Action**  
2

3 The proposed veterans' home project would not adversely impact populations in the area and no  
4 residential relocations would be required. Construction and operation of the proposed facility  
5 would add approximately 100 veteran residents to the area, as well as a small number of resident  
6 staff for the facility.  
7

8                   **3.10.1.3 Environmental Consequences of the No Action Alternative**  
9

10 The no action alternative would have no effects on populations in the project area.  
11

12                   **3.10.2 Employment**  
13

14                   **3.10.2.1 Affected Environment**  
15

16 Based on the City-Data Forum website (2012), the county employment is divided with 82  
17 percent private wage or salary; 10 percent government; and 8 percent self-employed, not  
18 incorporated. According to the U.S. Bureau of Labor Statistics website (2012), the  
19 unemployment rate in Bradley County was 7.2 percent in December 2011, down from the near  
20 10 percent rate experienced since late summer of 2008.  
21

22                   **3.10.2.2 Environmental Consequences of the Proposed Action**  
23

24 The proposed project will cause minor beneficial impacts to the local area during construction  
25 and operation of the proposed veterans' home. The effects during the construction period would  
26 be short-term based on the relatively short construction period required to conduct the site  
27 preparation and construction of the facility and associated components such as landscaping,  
28 parking, and access roads. The operation of the facility would produce longer-term beneficial  
29 impacts on local employment for the approximate 100 health-care professionals and service  
30 industry staff, e.g., food services, laundry services, landscaping maintenance services, etc.  
31

32                   **3.10.2.3 Environmental Consequences of the No Action Alternative**  
33

34 The no action alternative would have no impact on employment.  
35

36                   **3.10.3 Income**  
37

38                   **3.10.3.1 Affected Environment**  
39

40 Median household income (2006-2010) for Bradley County based on U.S. Census data (2012)  
41 was \$40,032, compared with that of the State of Tennessee of \$43,314 for the same period. In  
42 Bradley County those considered to be below the poverty level for this period was 16 percent,  
43 compared with the State of Tennessee value of 16.5 percent.  
44  
45

1                   **3.10.3.2 Environmental Consequences of the Proposed Action**  
2

3 The proposed project will not have an appreciable impact on the county or state median  
4 household income or poverty level due to the relatively small number of people that would be  
5 employed during the construction and operation of the proposed veterans' home facility.  
6

7                   **3.10.3.3 Environmental Consequences of the No Action Alternative**  
8

9 The no action alternative would have no impact on income.  
10

11                   **3.10.4 Protection of Children**  
12

13                   **3.10.4.1 Affected Environment**  
14

15 Executive Order (EO) 13045 entitled *Protection of Children from Environmental Health Risks*  
16 *and Safety Risks* (dated April 21, 1997) recognizes the growing body of scientific knowledge that  
17 demonstrates children may suffer disproportionately from environmental health and safety risks.  
18 These arise because children's bodily systems are not fully developed; they eat, drink and  
19 breathe more in proportion to their body weight; and their behavioral patterns may make them  
20 more susceptible to accidents. Based on these factors, the EO directs each federal agency to (1)  
21 make it a high priority to identify and assess environmental health and safety risks that may  
22 disproportionately affect children and (2) assure that its policies, programs, activities, and  
23 standards address disproportionate risks to children that result from environmental or safety  
24 risks. All activities undertaken at the proposed veterans' home facility are to consider the  
25 requirements of this EO. The 2010 Census showed that 23 percent of the populations in Bradley  
26 County were below the age of 18 (23.6 percent for the State of Tennessee).  
27

28                   **3.10.4.2 Environmental Consequences of the Proposed Action**  
29

30 The proposed veterans' home project would not have any impacts that would disproportionately  
31 affect children. The proposed action complies with the requirements of EO 13045.  
32

33                   **3.10.4.3 Environmental Consequences of the No Action Alternative**  
34

35 The no action alternative would have no impact on children.  
36

37                   **3.11 Community Services**  
38

39                   **3.11.1 Affected Environment**  
40

41 Law enforcement within Bradley County includes the Sheriff's Department (approximately 100  
42 state certified patrol officers) and Cleveland Police Department (approximately 90 officers)  
43 (Cleveland/Bradley County Chamber of Commerce, 2004). The nearest police station to the  
44 proposed veteran's home site is 2.4 miles, and the closest existing fire station and paramedic  
45 service is 2.1 miles away with plans to build a new station 0.25 mile south of the site at the  
46 intersection of Westland Drive and Volunteer Drive. The nearest hospital, Bradley Memorial

1 Hospital, is located 3.4 miles north of the proposed veterans' home site. At the present time  
2 public transportation (Cleveland Urban Area Transit) does not serve this area of South Cleveland  
3 along Westland Drive; however, the nearest stop is about 0.5 mile away to the east.  
4

### 5 **3.11.2 Environmental Consequences of the Proposed Action**

6  
7 Due to the relatively small size of the proposed veterans' home facility, construction and  
8 operation of that facility would not cause any significant adverse impacts on community services.  
9

### 10 **3.11.3 Environmental Consequences of the No Action Alternative**

11  
12 The no action alternative would have no impact on community services.  
13

## 14 **3.12 Solid and Hazardous Materials**

### 15 **3.12.1 Affected Environment**

16  
17  
18 A Phase I Environmental Site Assessment of the proposed veterans' home site was performed by  
19 Thompson Engineering, Incorporated for the Bradley County Engineering Department in  
20 December 2011 (Bradley County Engineering Department, 2011). The evaluation was  
21 performed in accordance with ASTM Practice E1527-05, and revealed no evidence of recognized  
22 environmental conditions in connection with the subject property except for two piles of used  
23 rubber tires along the south central property boundary. Since that assessment was performed  
24 these used tires have been removed and properly disposed of. Past uses of the property were  
25 reviewed based on historic topographic maps and aerial photography. The earliest such historical  
26 record, a 1901 topographic map showed the site as undeveloped woodland. Other topographic  
27 maps viewed were dated 1965 and 1974. Aerial photographs dated 1974, 1977, 1982, 1989,  
28 1992, 1997, 2006, 2007, and 2008. These photographs do show some timber removal between  
29 1992 and 1997, and site clearing and grading in approximately 2006 for development of a  
30 proposed residential subdivision, but no other development or structures were noted on the site.  
31 Adjoining properties are undeveloped or are used for residential or light commercial purposes.  
32 The site inspection revealed none of the following: hazardous substances, petroleum products,  
33 underground or aboveground storage tanks, electrical equipment that could contain PCBs, pools  
34 of liquid, stained soil, odors, stressed vegetation, wastewater, water wells, or septic systems.  
35

### 36 **3.12.2 Environmental Consequences of the Proposed Action**

37  
38 Based on the Phase I Environmental Site Assessment discussed in the previous paragraph, the  
39 proposed construction and operation of a veterans' home facility on the subject property is  
40 unlikely to encounter or disturb any hazardous materials. During construction and operation of  
41 the facility all solid wastes, medical wastes, and other wastes generated on the site would be  
42 disposed of in accordance with local, state, and federal laws and regulations.  
43

### 44 **3.12.3 Environmental Consequences of the No Action Alternative**

45  
46 The no action alternative would have no impact on solid or hazardous materials.

1  
2 **3.13 Transportation and Parking**

3  
4 **3.13.1 Affected Environment**

5  
6 Primary access to the site is from Westland Drive, a two-lane road, which connects to U.S.  
7 Highway 74 (Appalachian Highway), a four-lane road approximately 0.6 mile to the south,  
8 thence 2.5 miles west to Interstate 75. The primary access road to the facility from Westland  
9 Drive would be approximately 1,400 feet long. A secondary emergency and service vehicle  
10 access road to the south would also be developed to serve the facility. That secondary access  
11 road is proposed to be located on a new county road right-of-way at the adjacent landowner,  
12 Classic Express, running from the southeastern boundary of the property southward  
13 approximately 1,400 feet to Commercial Drive. The nearest large metropolitan area to the  
14 project site is Chattanooga, Tennessee, located 24 miles to the southwest. The Chattanooga  
15 Metro Airport is located about 20 miles from the site. The closest railroad to the site is located  
16 about 0.75 miles to the east. Paved automobile and service truck parking would be developed at  
17 the facility.

18  
19 Traffic count information is not available for Westland Drive because of the low volume of  
20 traffic. The volume is well below the criteria for initiating time period traffic counts. Currently  
21 there are no traffic congestion or accessibility issues in the immediate proposed project location  
22 area. A traffic study by the City of Cleveland was conducted on Appalachian Parkway (February  
23 21-22, 2001) at the intersection of Westland Drive. For February 21, 2001, the peak afternoon  
24 traffic was between 4-5pm, with a peak hourly volume of 144 vehicles northbound and 22  
25 vehicles southbound (not enough data to calculate the morning peak data). For February 22,  
26 2001, the peak morning traffic was between 11-12am, with a peak hourly volume of 144 vehicles  
27 northbound, and between 7-8am, with a peak hourly volume of 114 vehicles southbound. The  
28 peak afternoon traffic on February 22, 2001, was 2:45-3:45pm with 164 vehicles northbound,  
29 and from 2:30-3:30pm with 67 vehicles southbound (City of Cleveland, 2001).

30  
31 Traffic planning studies have been conducted by the Cleveland Urban Area Metropolitan  
32 Planning Organization (CUAMPO) in 2006 and 2011. The current level of service based on  
33 2000 traffic volumes identify the following corridor of concern in the general area of the  
34 proposed veterans' home facility: I-75 south of Exit 20 (Appalachian Highway) to the Bradley  
35 County line. The Appalachian Highway, Lee Highway (U.S. Highway 11) and Westland Drive  
36 are identified as "no concern" based on the 2000 traffic volumes. Traffic projections for the  
37 project area in South Cleveland for the year 2030 anticipate the following "corridors of concern"  
38 (assuming no additional improvements beyond those currently under construction or under  
39 development): I-75 (entire reach through Cleveland area); a short reach of the Appalachian  
40 Highway from I-75 Exit 20 eastward for about 0.75 mile; Lee Highway for about a mile south of  
41 Appalachian Highway; and an approximate 0.75 reach of Lee Highway north of where Westland  
42 Drive/Victory Street intersects with Lee Highway.

1           **3.13.2 Environmental Consequences of the Proposed Action**  
2

3 Based on the CUAMPO studies (2006 and 2011), no significant adverse traffic impacts would be  
4 anticipated due to construction and operation of the proposed veterans' home facility at 1940  
5 Westland Drive. Based on comments provided as part of this EA public review process, the City  
6 of Cleveland recommends evaluation of traffic movement and turning along Westland Drive into  
7 the proposed site (City of Cleveland letter dated February 24, 2012, copy in Appendix B).  
8 Improvement to Westland Drive at the entrance to the site, such as a left turn lane for northbound  
9 traffic, will be evaluated by the county engineering department in coordination with the city  
10 engineering department. Well-designed vehicle ingress and egress points will be included in the  
11 project design as the detailed plans are developed.  
12

13           **3.13.3 Environmental Consequences of the No Action Alternative**  
14

15 The no action alternative would have no impact on traffic and parking.  
16

17           **3.14 Utilities**  
18

19           **3.14.1 Affected Environment**  
20

21 The utilities information pertinent for the proposed veterans' home site is identified in "The  
22 Book" publication of the Cleveland/Bradley County Chamber of Commerce (2004). Cleveland  
23 Utilities provides electric power in the Cleveland area with two main 161 kV delivery point  
24 substations with a combined capacity of 380 megawatts. A multi-looped 69 kV transmission  
25 system and 12 modern distribution substations provide a high degree of reliability for the  
26 Cleveland area and capacity for future growth. Current power lines run along Westland Drive on  
27 the east side of the proposed project site. Cleveland Utilities also provides water and sewer  
28 service in the project area with water and sewer lines along Westland Drive. The Cleveland  
29 Water Plant (drinking water) has a capacity of 8.5 million gallons per day (mgd) with a current  
30 usage of about 6.0 mgd. Natural gas distribution in the area is by the Chattanooga Gas  
31 Company, with access along Westland Drive. Telecommunication services, including telephone,  
32 television, and internet are also available along Westland Drive.  
33

34           **3.14.2 Environmental Consequences of the Proposed Action**  
35

36 All appropriate utility services, e.g., water, sewer, electricity, gas, and telecommunications, exist  
37 currently along Westland Drive and they have adequate capacity to address the needs of the  
38 proposed veterans' home facility. The proposed action would have no significant impact on the  
39 utility services in the Cleveland/Bradley County area.  
40

41           **3.14.3 Environmental Consequences of the No Action Alternative**  
42

43 The no action alternative would have no impact on utilities.  
44  
45

1       **3.15 Environmental Justice**

2  
3       **3.15.1 Affected Environment**

4  
5       EO 12898 entitled *Federal Actions to Address Environmental Justice in Minority and Low*  
6 *Income Populations* (dated February 11, 1994) requires that federal agencies conduct their  
7 programs, policies, and activities that substantially affect human health or the environment in a  
8 manner that ensures that such programs, policies, and activities do not have the effect of  
9 excluding persons or populations from participation in, denying persons or populations the  
10 benefits of, or subjecting persons or populations to discrimination under such programs, policies,  
11 and activities because of their race, color, or national origin. All activities undertaken at the  
12 proposed veterans' home facility are to consider the requirements of this EO. The ethnic  
13 breakdown for Bradley County based on the 2010 census is: 90.3 percent white; 4.3 percent  
14 black; 0.3 percent American Indian; 0.8 percent Asian; 4.7% percent Hispanic or Latino; and 1.8  
15 percent reporting two or more races.

16  
17       **3.15.2 Environmental Consequences of the Proposed Action**

18  
19       The proposed veterans' home project would not have any impacts that would affect minorities or  
20 low income groups. The proposed action complies with the requirements of EO 12898.

21  
22       **3.15.3 Environmental Consequences of the No Action Alternative**

23  
24       The no action alternative would have no adverse impacts on minority or low income groups.

25  
26       **3.16 Cumulative Impacts**

27  
28       **3.16.1 Affected Environment**

29  
30       The proposed site is located within the built-up area of Cleveland and South Cleveland, and the  
31 surrounding area has been, and continues to develop with a mixture of residential housing (single  
32 family homes and apartments along Westland Drive and mobile home parks within the area),  
33 churches, and businesses. The residential properties range from older homes (estimated 20-50  
34 years old) with larger lots to new large residential subdivisions located immediately to the  
35 southwest (Emerald Hills), and another (The Orchard) about 500 feet north of the project site  
36 (both of these subdivisions only have a few homes in them at this time, although the road and  
37 utility networks have been completed for several years). Typical businesses and industries in the  
38 area include a wide range such as a trucking company, an automobile dealership, a soft drink  
39 bottling company, a painting and cleaning service, an employment staffing office, a medical  
40 waste office, a fire protection company, a pharmaceutical manufacturing/distribution company,  
41 an equestrian products company, a photographic laboratory, a fabrics manufacturing company, a  
42 furniture company, storage unit and storage trailer rental companies, and other small  
43 manufacturing companies. The recent trends in development of this area have been a mixture of  
44 residential and business developments as the population of this area has increased. It is likely  
45 that these trends will continue, especially to the south of the site along the four-lane Appalachian  
46 Parkway with its quick access to I-75 which is located 2.5 miles to the west.

1  
2           **3.16.2 Environmental Consequences of the Proposed Action**  
3

4 The projected impacts from construction and operation of the proposed veterans' home facility  
5 when viewed cumulatively with other impacts from continued residential and business site  
6 development in the project vicinity (Cleveland/South Cleveland area) would produce a  
7 cumulative series of minor localized negative impacts on the various natural resources of the area  
8 (e.g., air, soil, water, flora, fauna) as well as a cumulative series of minor beneficial impacts on  
9 socioeconomic effects such as local employment and income. Overall, there would be no  
10 significant adverse cumulative effects as the result of construction or operation of the proposed  
11 veterans' home facility.  
12

13           **3.16.3 Environmental Consequences of the No Action Alternative**  
14

15 The projected cumulative impacts of the no action alternative would be driven by the ongoing  
16 growth of this urbanized area of Cleveland/South Cleveland. The residential and business  
17 developments along the urban corridors of the Appalachian Parkway and Westland Drive would  
18 continue. In the absence of development and operation of the proposed VA facility on this  
19 location, two scenarios exist for the proposed approximate 30-acre tract of land: 1) continue as an  
20 undeveloped property with vegetation continuing to recover from the 2006 land clearing and  
21 excavation/fill activity, or 2) residential or business development on the property consistent with  
22 many of the nearby properties in this area.  
23

24           **3.17 Potential for Generating Substantial Controversy**  
25

26 Based on discussions with officials within various governmental offices within Bradley County  
27 and the City of Cleveland, Tennessee, there is widespread support for the proposed project and  
28 little potential for substantial controversy.  
29

1 **4.0 PUBLIC INVOLVEMENT**  
2

3 Prior to preparation of this EA, the officials of the Bradley County, the Southeast Tennessee  
4 Veterans Home Council, the Tennessee State Veterans' Homes, and other local veterans  
5 organizations have notified various segments of the public regarding the potential siting of a  
6 Veterans' Home in the Bradley County area of Southeast Tennessee. In January 2012, an  
7 information letter containing a project description and a summary of general information on the  
8 proposed site location on Westland Drive (including maps and photographs) was sent to the  
9 following agencies:

- 10  
11 a. U.S. Environmental Protection Agency, Region 4  
12 b. U.S. Fish and Wildlife Service, Tennessee Ecological Services Field Office  
13 c. U.S. Department of Agriculture, Natural Resources Conservation Service  
14 d. U.S. Army Corps of Engineers, Nashville District  
15 e. Tennessee Department of Environment and Conservation  
16 f. Tennessee Natural Heritage Program  
17 g. Tennessee Wildlife Resources Agency  
18 h. Tennessee Division of Archaeology  
19 i. Tennessee State Veterans Homes  
20 j. Tennessee Division of Real Property  
21 k. Bradley County  
22 l. City of Cleveland  
23

24 These letters asked the agencies for information relative to beneficial and adverse impacts of the  
25 proposed project based on their respective area of jurisdiction and/or expertise. Response letters  
26 received from agencies are included in Appendix B. In addition, as previously mentioned in this  
27 EA, similar information packages were provided to a number of Native American tribes (copy in  
28 Appendix A). The response received from the Cherokee Nation is included in Appendix A.  
29

30 A public information meeting is planned in the Cleveland, TN area following publication of the  
31 Draft EA in order to provide additional opportunity for agencies and members of the public to  
32 learn more about the project and to offer comments. The meeting date and location of the  
33 meeting will be advertised through various media in the Bradley County area.  
34

1 **5.0 MITIGATION**

2

3 No special mitigation actions have been identified for the proposed project. The construction  
4 and maintenance of routine BMPs would be an integral part of the actions that would take place  
5 to lessen impacts to resource issues such as onsite erosion control, dust control, and construction  
6 noise abatement.

7

1 **6.0 CONCLUSIONS**  
2

3 The proposed veterans' home site does not have any jurisdictional wetlands, designated  
4 floodplains, recorded cultural resources, recorded threatened/endangered species, or known  
5 hazardous materials. Therefore the proposed project would have no significant adverse impacts  
6 to these resource categories. The project has also been determined to have no significant impact  
7 on aesthetics, land use, air quality, geology, soils, hydrology, water quality, wildlife and habitat,  
8 noise, socioeconomic parameters (e.g., population, employment, income, protection of children,  
9 environmental justice), community services, transportation, or utilities. The projected impacts  
10 from construction and operation of the proposed veterans' home facility when viewed  
11 cumulatively with other impacts from continued residential and business site development in the  
12 project vicinity (Cleveland/South Cleveland area) would produce a cumulative series of minor  
13 localized negative impacts on the various natural resources of the area (e.g., air, soil, water, flora,  
14 fauna) as well as a cumulative series of minor beneficial impacts on socioeconomic effects such  
15 as local employment and income. Overall, there would be no significant adverse cumulative  
16 effects as the result of construction or operation of the proposed veterans' home facility.  
17  
18

1 **7.0 LIST OF PREPARERS**  
2

3 Michael Eubanks, Senior Environmental Scientist (Biology), Thompson Engineering, 40 years  
4 experience, NEPA document preparation.

5  
6 Chris Gillentine, P.G., Senior Geologist, Thompson Engineering, 22 years experience. Project  
7 Management and Hazardous Materials Assessment.  
8

9 Mack McCarley, P.E., Civil Engineer, Thompson Engineering, 43 years experience. Project  
10 Senior Principal

11  
12 Richard Gibbs, P.E., Senior Engineer, Thompson Engineering, 35 years experience,  
13 Geotechnical Engineering.  
14

15 Preston Denson, P.E., Civil Engineer, Thompson Engineering, 6 years experience, Civil  
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17

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20

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23

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25

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28

29 Joe Davis, Bradley County, Tennessee Veterans Service Office, Southeast Tennessee Veterans  
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31

32 Cid Heidel, Co-chair of Southeast Tennessee Veterans Home Council, 41 years experience.  
33 Project oversight.  
34

35 Sandra Knight, P.E., County Engineer, Bradley County, 25 years experience. Project oversight.  
36

37 Taylor Wyrick, Director of Plant Operations, Tennessee State Veterans' Homes, 16 years  
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39

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45 Native American Consultation.  
46

1 Thomas W. Moran, P.E., Environmental Engineer, Office of Construction and Facilities  
2 Management, Department of Veterans Affairs, 30 years experience. NEPA Specialist.

3

4

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1 **9.0 LIST OF ACRONYMS AND ABBREVIATIONS**  
2

- 3 AQI – Air Quality Index  
4 ASTM – American Society of Testing and Materials  
5 BMP – Best Management Practice  
6 CDP – Census Designated Places  
7 CFR – Code of Federal Regulations  
8 CUAMPO -- Cleveland Urban Area Metropolitan Planning Organization  
9 EA – Environmental Assessment  
10 EO – Executive Order  
11 EPA – U.S. Environmental Protection Agency  
12 FONSI – Finding of No Significant Impact  
13 FR – Federal Register  
14 FWS – U.S. Fish and Wildlife Service  
15 kV -- kilovolt  
16 MGD – Million Gallons per Day  
17 MSL – Mean Sea Level  
18 NEPA – National Environmental Policy Act  
19 NPDES – National Pollutant Discharge Elimination System  
20 NRCS – U.S. Department of Agriculture, Natural Resources Conservation Service  
21 SWPPP – Stormwater Pollution Prevention Plan  
22 USGS – U.S. Geological Survey  
23 VA – U.S. Department of Veterans Affairs  
24

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## **Appendix A**

### **Native American Tribes Correspondence**

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**DEPARTMENT OF VETERANS AFFAIRS**  
**Office of Construction & Facilities Management**  
**Washington DC 20420**

February 29, 2012

[REDACTED]  
[REDACTED]  
[REDACTED]

**Subject: Section 106 of the National Historic Preservation Act – Request for Consultation**  
**Department of Veterans Affairs**  
**Proposed Tennessee Veterans' Home, Cleveland**  
**1940 Westland Drive SW, Cleveland, Bradley County, Tennessee**  
**Project #47-014**

Dear [REDACTED]:

U.S. Department of Veterans Affairs (VA), in coordination with Bradley County and the Tennessee State Veterans' Homes Board (TSVH), is considering a Tennessee Veterans' Home, Cleveland. VA is initiating the Section 106 process of the National Historic Preservation Act (NHPA). VA would like to consult with you to identify any concerns you may have, and to seek your advice about how best to identify and address our potential effects on historic places. An Environmental Assessment (EA) also is being prepared in accordance with environmental regulations for compliance with the National Environmental Policy Act (NEPA). In order that the potential historic, cultural, or environmental effects of the project may be fully evaluated and considered, VA hereby is requesting that you respond in writing if your tribe is interested in participating in the Section 106 process of the NHPA. A project vicinity map for the proposed facility is provided on Figure 1.

VA provides long term care services to Veterans through three national programs: VA owned and operated homes, state Veterans' homes owned and operated by the states often with Federal grant funding, and the community home program where VA contracts with local homes through VA Medical Centers. Efforts have been underway for a number of years to locate a state Veterans' home in Cleveland/Bradley County, Tennessee. It is proposed to be a facility offering intermediate and skilled levels of nursing care to provide a home for Tennessee Veterans who have honorably served our country and now are in need of long term care.

In 2007, there were 45,861 Veterans in Bradley County and the surrounding catchment area of Hamilton, Polk, McMinn, Meigs and Rhea counties. Veteran's population in the age group 65 to 84 is now 16,394. The number of Veterans in that age group is expected to increase to 17,944 by 2014. There are currently three Tennessee State Homes in operation; Murfreesboro (140-bed facility opened in 1991), Humboldt (140-bed facility opened in 1996) and Knoxville (140-bed facility opened in 2006). The Tennessee State Veterans' Homes Board is responsible for operation of these facilities. These homes provide professional nursing care, social services and activities, and rehabilitation services. A fourth home has been approved for northern Tennessee at Clarksville in Montgomery County. The current efforts for a home in Bradley County are spearheaded by the Southeast Tennessee Veterans' Home Council, as they are working diligently for this to be the location for a state home in this portion of

Tennessee.

The conceptual Veterans' home plan is for a 108-bed facility to be located on an approximate 30-acre tract of donated property on Westland Drive, on the south side of Cleveland, Tennessee. The easternmost approximate 2.5 acres of this tract are within the City of Cleveland corporate limits, while the remaining approximate 25.5 acres are in the unincorporated area of Bradley County. The small portion of the site within the Cleveland city limits is zoned as Light Industrial, while the majority of the site, in unincorporated Bradley County, is zoned as Rural Residential, with the westernmost approximate 8.6 acre area zoned as High Density Residential. The Veterans' home facility is proposed to be approximately 98,000 gross square feet, with a general site plan shown on Figure 2 and a conceptual ground-level view shown on Figure 3. The actual facility and parking footprint would occupy approximately 5 acres on the tract of donated property.

The coordinates for the proposed site are N35°8'41.27"/W84°54'18.35". The approximate 30-acre tract of land previously has been cleared and graded in approximately 2006 for a residential subdivision; however, the site development was never completed. The site currently resembles an open pasture-like habitat with a gravel road network and detention pond, with a few small patches of young trees (mixed pine and hardwood). Figure 4 shows an aerial photograph (2010) of the proposed project site and Figure 5 depicts the topography of the site (USGS Topographic Map – South Cleveland Quadrangle). Elevations range from approximately 900 feet NGVD on the east to near 1,175 feet NGVD on the western ridge. The eastern end of the property is more level and likely the preferred location for the proposed facility in order to minimize site preparation costs and impacts. Ground level photographs (December 2011) show the current conditions on the site (Figures 6, 7, 8, and 9).

No historic properties exist on the site, as there are no standing structures on the site. There are several sites in Bradley County on the National Register of Historic Places; however, they are predominantly located in downtown Cleveland, with the closest site located over a mile northwest of this proposed Veterans' home location.

According to a Panamerican Consultants, Inc. report dated January 25, 2012, a review of the files at the Tennessee Department of Archaeology for recorded archaeological sites within a 2 mile radius of the potential site revealed that there are no previously recorded sites on the tract, but 8 sites within 2 miles of the site (Table 1).

**Table 1: Previously recorded sites within 2 mi. of the study area.**

| Site   | Location                             | Description  | Date                            |
|--------|--------------------------------------|--|---------------------------------|
| 40BY28 | Easting 689 900<br>Northing 3892 500 | The Minor Site: a potentially eligible stratified Woodland and Mississippian site on terrace of Candies Creek. Lee College conducted test excavations of the site in 1991 and obtained a C14 date (Garner 1991). | 1977,<br>1981,<br>1991,<br>1995 |
| 40BY30 | Easting 690 400<br>Northing 3892 550 | The Hair Conrad Farmstead: A restored early 19th Century Cherokee Farmstead located on the Blythwood Farm.   | 1979                            |
| 40BY32 | Easting 693 000<br>Northing 3892 000 | Internment Center for Cherokees used in 1838; site is based on archival data and Fort Hill Cemetery today.   | 1979                            |

|         |                                      |  |      |
|---------|--------------------------------------|--|------|
| 40BY110 | Easting 689 620<br>Northing 3892 400 | A Late Archaic and Mississippian open habitation on a terrace of Candies Creek. The site was located during a utility line survey(Alexander 1995). | 1995 |
| 40BY146 | Easting 692 500<br>Northing 3891 000 | Fort McPherson: A Civil War redoubt.   | 1997 |
| 40BY149 | Easting 692 300<br>Northing 3890 600 | A Civil War encampment on the north end of Lead Mine Ridge.  | 1997 |
| 40BY165 | Easting—various<br>Northing—various  | Trail of Tears Bell’s Route Bradley County segment   | 2001 |
| 40BY176 | Easting 689 050<br>Northing 3892 460 | Early 19th Century Homestead located during a pipeline survey (Pickard et al. 2003a).  | 2001 |

A Phase 1A cultural resources survey will be conducted as part of the Section 106 process of the NHPA and coordinated with the Tennessee Division of Archaeology.

Following completion of the NEPA process, the ownership of the selected property would transfer from the current owner to the State of Tennessee, Department of Veterans Affairs. Section 106 and the EA are being prepared to address construction, operation, and maintenance of the Veterans’ home facility and associated structures. Alternatives being considered include various site locations within the 30-acre tract of donated land, as well as the no-action alternative.

We respectfully request a response within 30 days of the date of this letter to notify us if you would like to be involved as a consulting party for the Section 106 process of the NHPA. If you have any questions, please do not hesitate to contact me at (202) 632-5529 or kathleen.schamel2@va.gov. Thank you for your attention to this matter.

Sincerely,



Kathleen Schamel  
Federal Preservation Officer

- Attachments: Figure 1. Tennessee Veterans’ Home, Cleveland, Vicinity Map  
Figure 2. Tennessee Veterans’ Home, Cleveland, Conceptual Plan View  
Figure 3. Tennessee Veterans’ Home, Cleveland, Conceptual Ground-Level View  
Figure 4. Tennessee Veterans’ Home, Cleveland, Aerial Photograph (2010)  
Figure 5. Tennessee Veterans’ Home, Cleveland, Topographic Map  
Figure 6. Site Photo, View Looking West from Westland Drive  
Figure 7. Site Photo, View Looking West from Southeast End of Site  
Figure 8. Site Photo, View Looking East from Center of Site  
Figure 9. Site Photo, View Looking East from West End of Site near Tower

Cc:

1. Cherokee Nation of Oklahoma
2. Eastern Band of Cherokee Indians
3. United Keetoowah Band of Cherokee Indians in Oklahoma
4. Chickasaw Nation of Oklahoma
5. Jena Band of Choctaw Indians
6. Muscogee (Creek) Nation of Oklahoma
7. Alabama-Coushatta Tribe of Texas
8. Alabama-Quassarte Tribal Town (Creek)
9. Kialegee Tribal Town (Creek)
10. Thlopthlocco Tribal Town (Creek)
11. Poarch Band of Creek Indians
12. Seminole Tribe of Florida
13. Seminole Nation of Oklahoma
14. Absentee-Shawnee Tribe of Oklahoma
15. Eastern Shawnee Tribe of Oklahoma
16. Shawnee Tribe
17. Coushatta Tribe of Louisiana
18. Quapaw Tribe of Oklahoma
19. Tunica-Biloxi Tribe of Louisiana

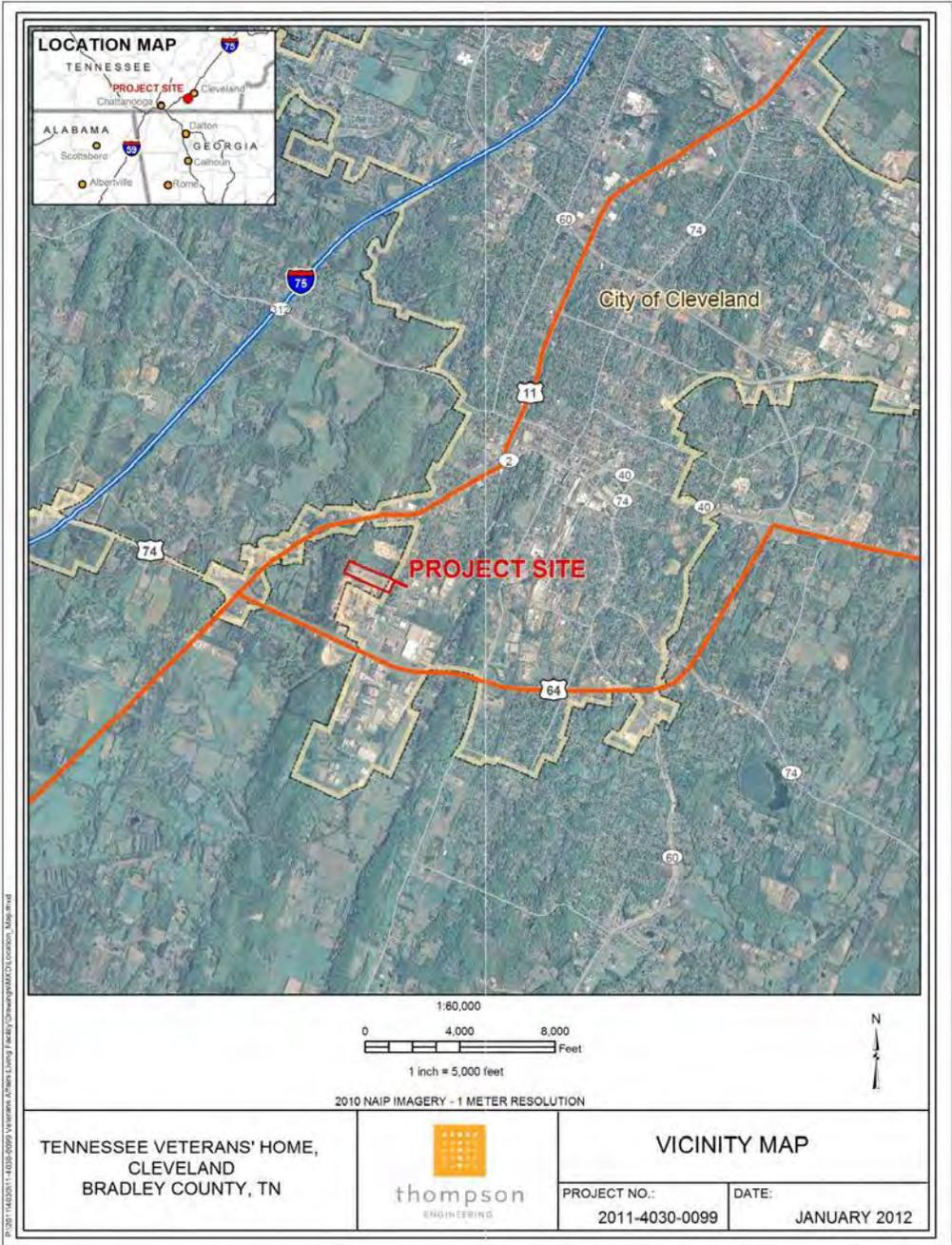


Figure 1. Tennessee Veterans' Home, Cleveland, Vicinity Map

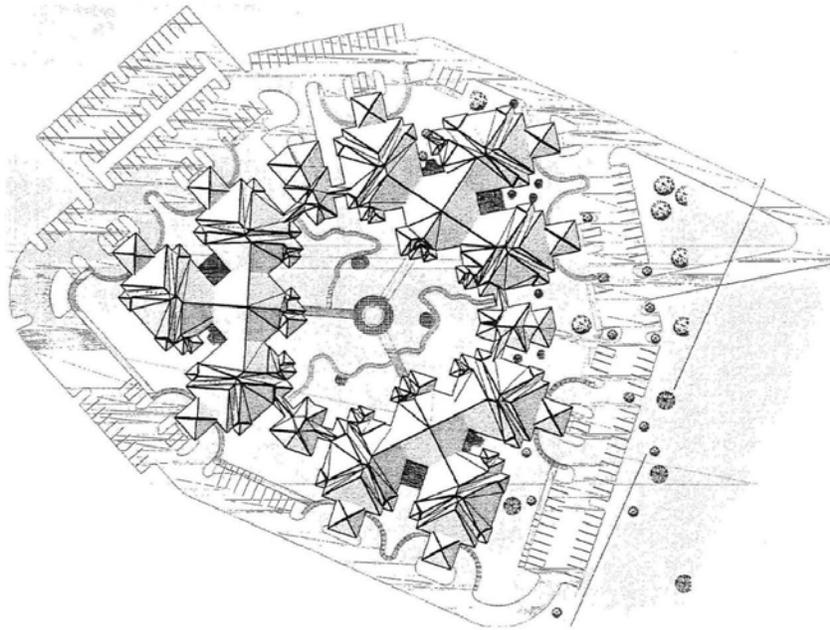


Figure 2. Tennessee Veterans' Home, Cleveland, Conceptual Plan View

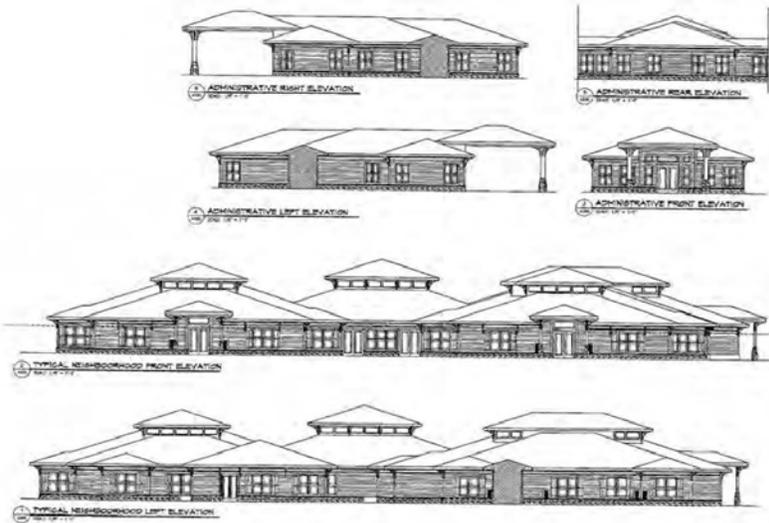


Figure 3. Tennessee Veterans' Home, Cleveland, Conceptual Ground-Level View

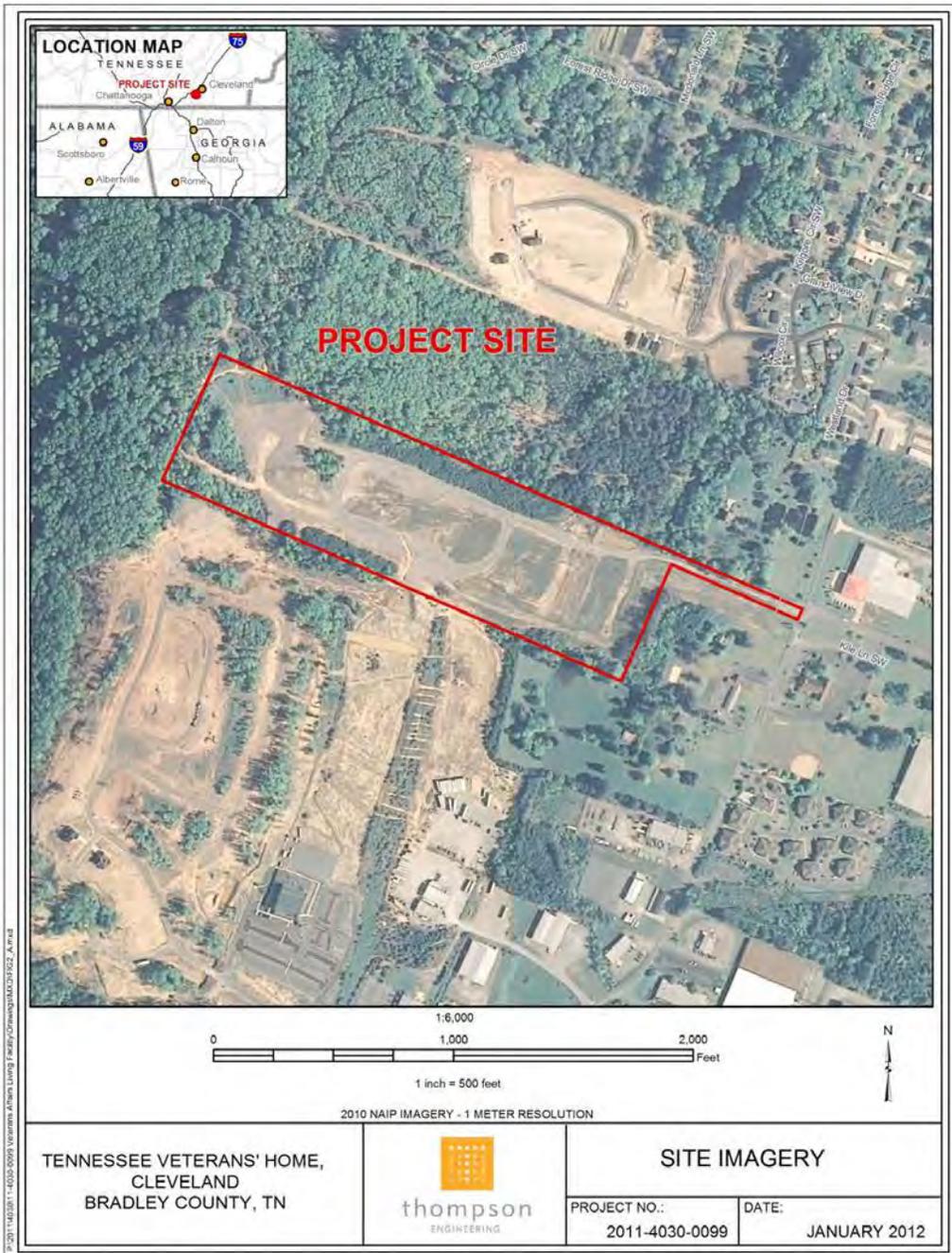


Figure 4. Tennessee Veterans' Home, Cleveland, Aerial Photograph

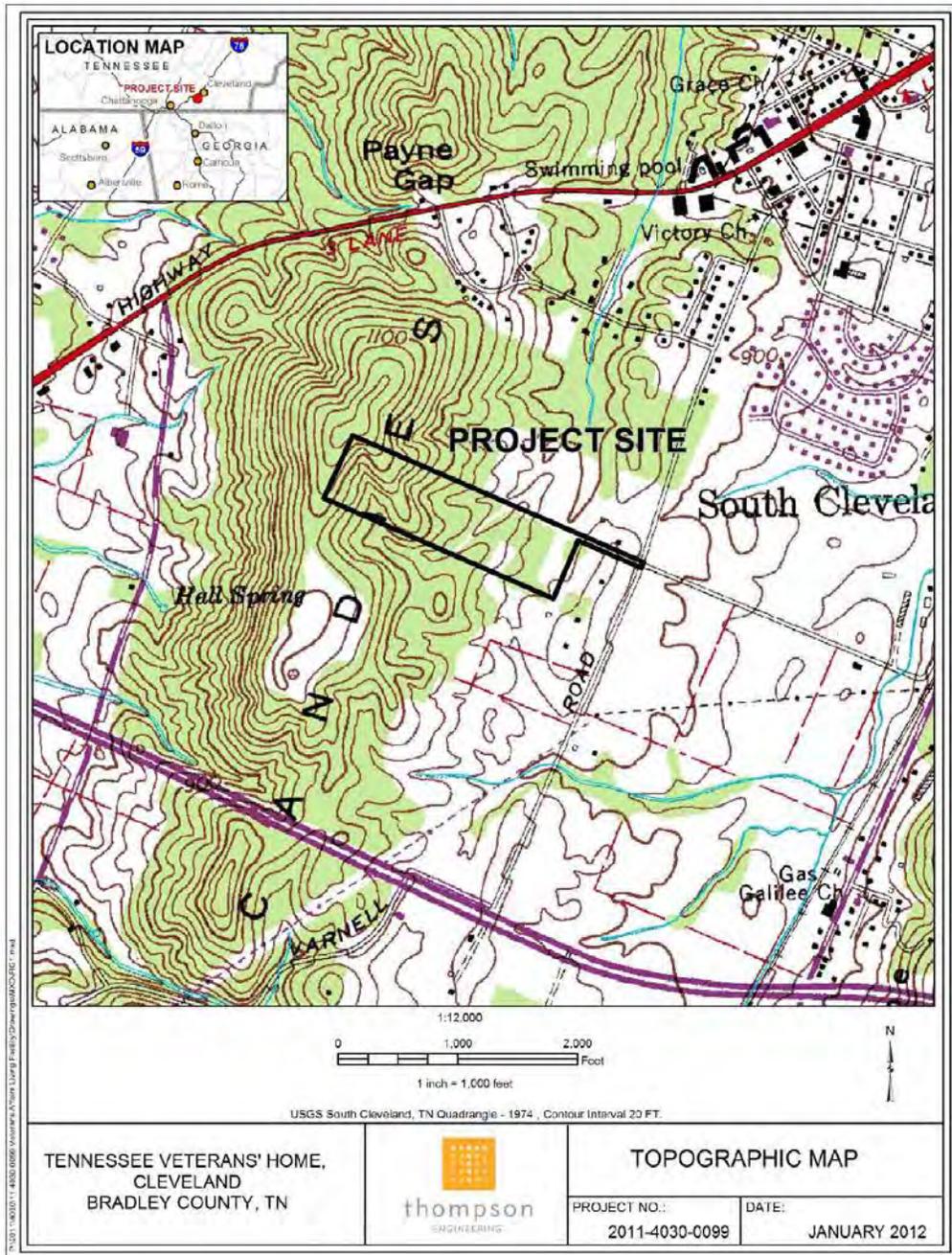


Figure 5. Tennessee Veterans' Home, Cleveland, Topographic Map



**Figure 6. Site Photo, View Looking West From Westland Drive**



**Figure 7. Site Photo, View Looking West From Southeast End of Site**



**Figure 8. Site Photo, Looking East From Center of Site**



**Figure 9. Site Photo, Looking East from West End of Site near Cell Tower**

**From:** [Schamel, Kathleen \(CFM\)](#)  
**To:** [Michael Eubanks](#)  
**Subject:** Fw: Tennessee state home consultation  
**Date:** Monday, April 30, 2012 11:07:51 AM

---

**From:** Richard Allen <Richard-Allen@cherokee.org>  
**To:** Schamel, Kathleen (CFM)  
**Sent:** Mon Apr 09 15:33:33 2012  
**Subject:** RE: Tennessee state home consultation

The Cherokee Nation has no knowledge of any historic, cultural or sacred sites within the affected area. Should any ground disturbance reveal an archaeological site or human remains, we ask that the all activity cease immediately and the Cherokee Nation and other appropriate agencies be contacted immediately.

Thank you,

Dr. Richard L. Allen  
Policy Analyst  
NAGPRA/Section 106 Contact  
Cherokee Nation  
P.O. Box 948  
Tahlequah, Oklahoma 74465  
(918) 453-5466 (office)  
(918) 822-2707 (cell)  
(918) 458-5898 (fax)

---

**From:** Schamel, Kathleen (CFM) [mailto:[Kathleen.Schamel2@va.gov](mailto:Kathleen.Schamel2@va.gov)]  
**Sent:** Wednesday, February 29, 2012 10:07 AM  
**To:** Richard Allen; 'Scott McGee'  
**Subject:** Tennessee state home consultation

Kathleen Schamel  
Federal Preservation Officer  
Office of Construction & Facilities Management (00CFM1)  
Department of Veterans Affairs  
202-632-5529 (NEW)

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**Appendix B**  
**Agency Correspondence**

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January 25, 2012

Subject: **Environmental Assessment – Request for Information  
Department of Veterans Affairs  
Proposed Tennessee Veterans' Home, Cleveland  
1940 Westland Drive SW, Cleveland, Bradley County, Tennessee  
Project #47-014**

Dear Sir or Madam:

Thompson Engineering Incorporated has been retained by Bradley County to assist the Tennessee State Veterans' Homes Board (TSVH) and U.S. Department of Veterans Affairs (VA) in preparation of an Environmental Assessment (EA) for the Tennessee Veterans' Home, Cleveland. The EA is being prepared as required by the Federal Matching Grant requirements. The EA is being prepared in accordance with environmental regulations for compliance with the National Environmental Policy Act (NEPA). In order that the potential environmental effects of the project may be fully evaluated and considered, the VA is hereby requesting that you respond in writing concerning any beneficial or adverse impacts relative to the interests of your agency. A project vicinity map for the proposed facility is provided on Figure 1.

The VA provides long term care services to veterans through three national programs: VA owned and operated homes, state veterans' homes owned and operated by the states, and the community home program where the VA contracts with local homes through VA Medical Centers. Efforts have been underway for a number of years to locate a state veterans' home in Cleveland/Bradley County, Tennessee. It is proposed to be a facility offering intermediate and skilled levels of nursing care to provide a home for Tennessee veterans who have honorably served our country and now are in need of long term care.

In 2007, there were 45,861 veterans in Bradley County and the surrounding counties of Hamilton, Polk, McMinn, Meigs and Rhea. Veteran's population in the age group 65 to 84 is now 16,394. The number of veterans in that age group is expected to increase to 17,944 by 2014. There are currently three Tennessee State Homes in operation; Murfreesboro (140-bed facility opened in 1991), Humboldt (140-bed facility opened in 1996) and Knoxville (140-bed facility opened in 2006). The Tennessee State Veterans' Homes Board is responsible for operation of these facilities. These homes provide professional nursing care, social services and activities and rehabilitation services. A fourth home has been approved for northern Tennessee at Clarksville in Montgomery County. The current efforts for a home in Bradley County are

2970 Cottage Hill Road  
Suite 100  
Mobile, AL 36605  
251.666.2443 ph. / 251.666.6422 fax  
www.thompsonengineering.com

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spearheaded by the Southeast Tennessee Veterans' Home Council, as they are working diligently for this to be the location for a state home in this portion of Tennessee.

The conceptual veterans' home plan is for a 108-bed facility to be located on an approximate 30-acre tract of donated property on Westland Drive, on the south side of Cleveland, Tennessee. The easternmost approximate 2.5 acres of this tract are within the City of Cleveland corporate limits, while the remaining approximate 25.5 acres are in the unincorporated area of Bradley County. The small portion of the site within the Cleveland city limits is zoned as Light Industrial, while the majority of the site, in unincorporated Bradley County, is zoned as Rural Residential, with the westernmost approximate 8.6 acre area zoned as High Density Residential. The veterans' home facility is proposed to be approximately 98,000 gross square feet, with a general site plan shown on Figure 2 and a conceptual ground-level view shown on Figure 3. The actual facility and parking footprint would occupy approximately 5 acres on the tract of donated property.

The coordinates for the proposed site are N35°8'41.27"/W84°54'18.35". The approximate 30-acre tract of land has been cleared and graded in approximately 2006 for a residential subdivision; however, the site development was never completed. The site currently resembles an open pasture-like habitat with a gravel road network and detention pond, with a few small patches of young trees (mixed pine and hardwood). Figure 4 shows an aerial photograph (2010) of the proposed project site and Figure 5 depicts the topography of the site (USGS Topographic Map – South Cleveland Quadrangle). Elevations range from approximately 900 feet NGVD on the east to near 1,175 feet NGVD on the western ridge. The eastern end of the property is more level and likely the preferred location for the proposed facility in order to minimize site preparation costs and impacts. Ground level photographs (December 2011) show the current conditions on the site (Figures 6, 7, 8, and 9).

Soils on the proposed site are well drained and dominated by Fullerton cherty silty clay loam, severely eroded hilly phase, with other soil types including Fullerton cherty silt loam, eroded hilly phase; Greendale cherty silt loam; Clarksville cherty silt loam, eroded rolling phase; Montevallo shaly silt loam, eroded hilly phase; and Cotaco silt loam. No hydric soils are identified on the site.

According to the National Wetlands Inventory there are no wetlands on the proposed site (the nearest wetland is a small manmade pond on adjacent private property north of the site). As mentioned above, there is a small detention pond constructed on the northeast portion of the site, and some small patches of cattails (*Typha* sp.) have established around a portion of this pond and a nearby ditch.

There are no streams on the proposed project site. The proposed site is within the Tennessee River Basin. Drainage from the 30-acre site flows northward along ephemeral drains off-site for approximately 900 feet to an unnamed "blue-line" stream on the USGS topographic map (shown on Figure 5). That unnamed stream continues off-site north approximately 8,400 feet to Beech Spring Branch that flows westward about 3,150 feet to Candies Creek that flows northward approximately 17 miles to the Hiwassee River impounded arm of Chickamauga Lake. Based on the National Flood Insurance Program (Map Number 47011C0138B) none of the 30-acre

proposed site is within the 100 year floodplain.

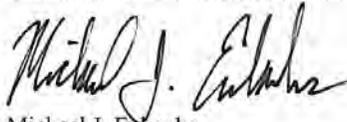
No historic properties exist on the site. There are several sites in Bradley County on the National Register of Historic Places; however, they are predominantly located in downtown Cleveland, with the closest site located over a mile northwest of this proposed veterans' home location. A Phase 1A cultural resources survey will be conducted as part of the EA process and coordinated with the Tennessee Division of Archaeology.

Primary access to the site is from Westland Drive, a two-lane road, which connects to U.S. Highway 74 (Appalachian Highway), a four-lane road approximately 0.6 mile to the south, thence 2.5 miles west to Interstate 75. A secondary emergency access would also be developed to serve the facility. The nearest large metropolitan area to the project site is Chattanooga, Tennessee, located 24 miles to the southwest. The Chattanooga Metro Airport is located about 20 miles from the site. The closest railroad to the site is located about 0.75 miles to the east.

Following completion of the NEPA process, the ownership of the selected property would transfer from the current owner to the State of Tennessee, Department of Veterans Affairs. The EA is being prepared to address construction, operation, and maintenance of the veterans' home facility and associated structures. Alternatives being considered include various site locations within the 30-acre tract of donated land, as well as the no-action alternative.

We respectfully request that the impacts of this project under the purview of your agency be considered as soon as possible. A response within 30 days of the date of this letter would be appreciated. If you have any questions, please do not hesitate to contact the undersigned at (251) 348-8104, or email at [meubanks@thompsonengineering.com](mailto:meubanks@thompsonengineering.com), or at the address on the first page of this letter. Thank you for your attention to this matter.

Sincerely,  
**THOMPSON ENGINEERING, INC.**



Michael J. Eubanks  
Senior Environmental Scientist

Attachments: Figure 1. Tennessee Veterans' Home, Cleveland, Vicinity Map  
Figure 2. Tennessee Veterans' Home, Cleveland, Conceptual Plan View  
Figure 3. Tennessee Veterans' Home, Cleveland, Conceptual Ground-Level View  
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Figure 9. Site Photo, View Looking East from West End of Site near Tower

Cc: U.S. Environmental Protection Agency – Region 4  
U.S. Fish and Wildlife Service, Tennessee Ecological Services Field Office  
U.S. Department of Agriculture, Natural Resources Conservation Service  
U.S. Army Corps of Engineers, Nashville District  
Tennessee Department of Environment and Conservation  
Tennessee Natural Heritage Program  
Tennessee Division of Archaeology  
Tennessee Wildlife Resources Agency  
Tennessee Historical Commission  
Tennessee State Veterans Homes  
Tennessee Division of Real Property  
Bradley County  
City of Cleveland

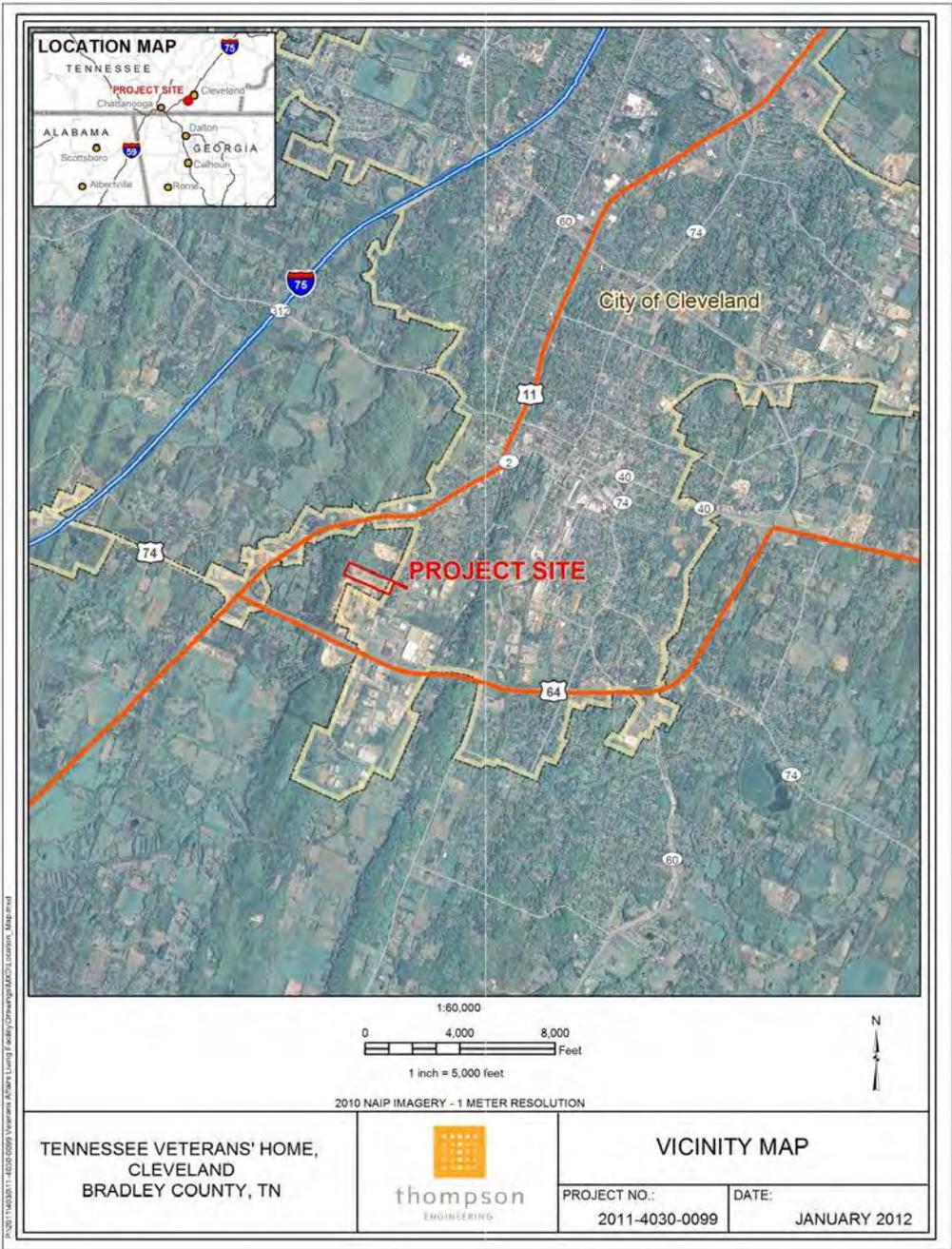


Figure 1. Tennessee Veterans' Home, Cleveland, Vicinity Map

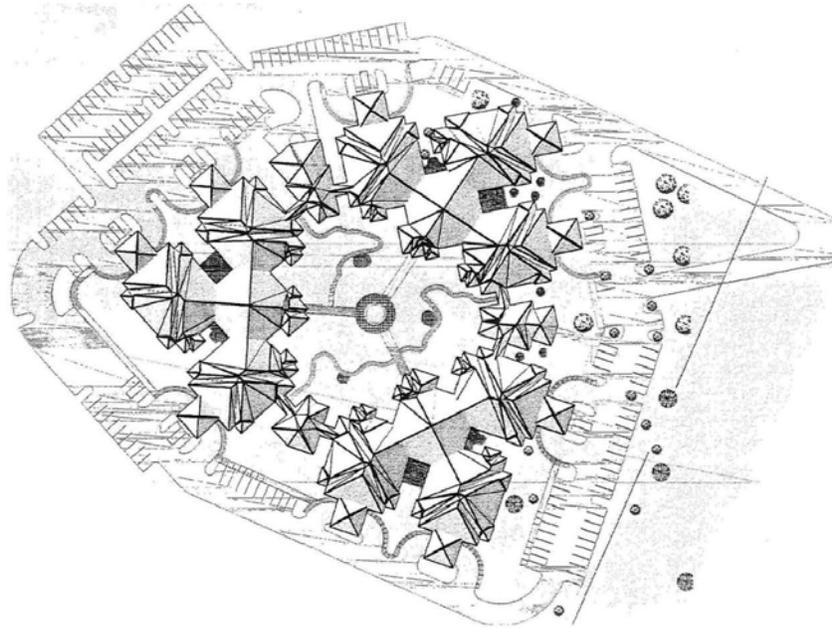


Figure 2. Tennessee Veterans' Home, Cleveland, Conceptual Plan View

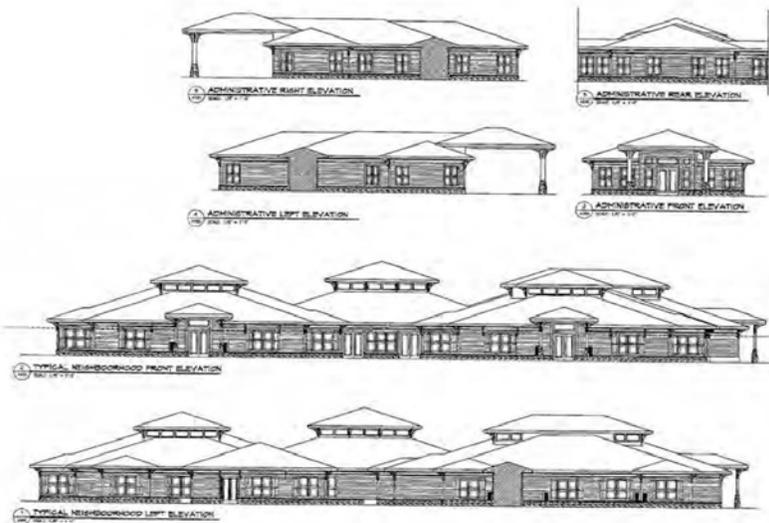
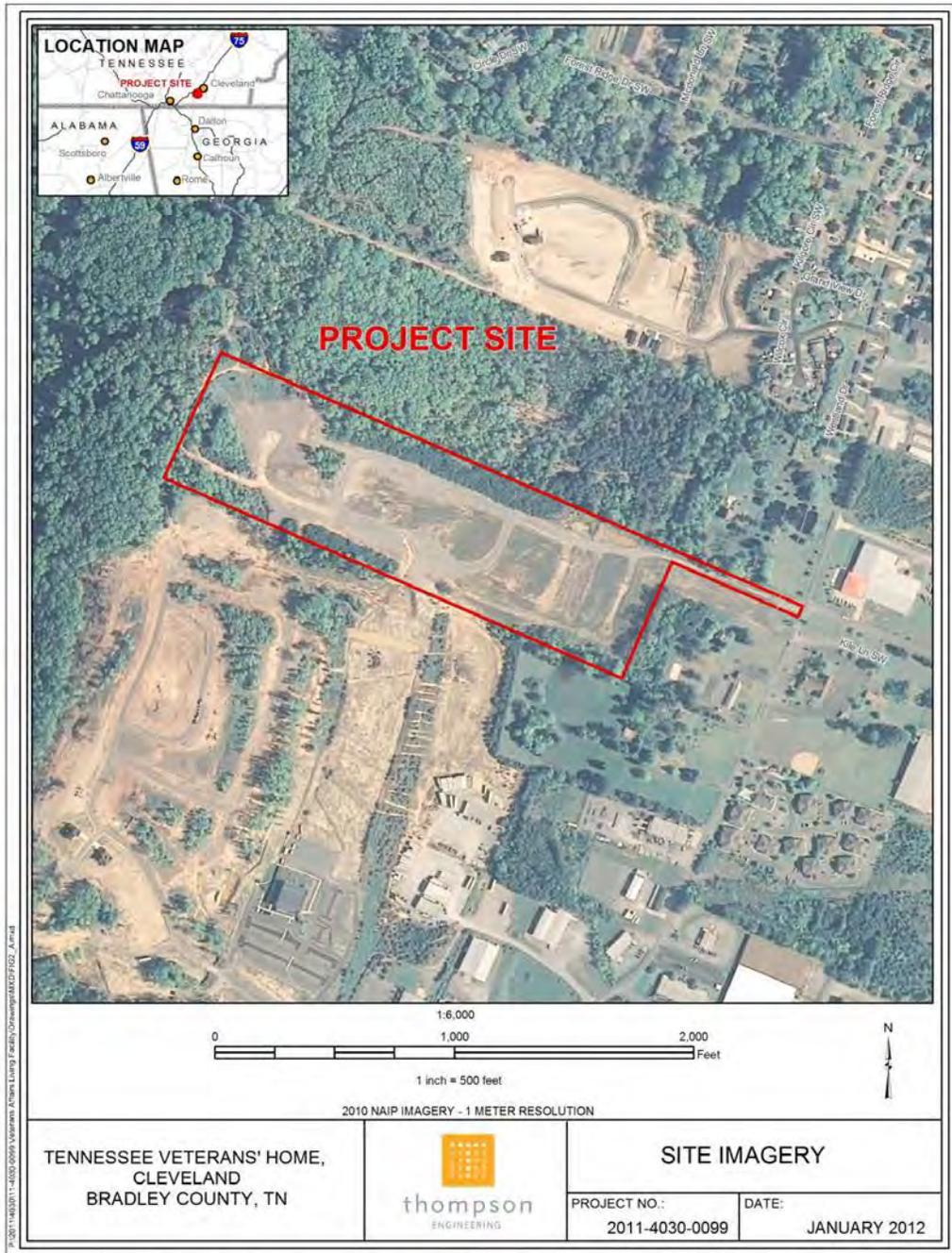


Figure 3. Tennessee Veterans' Home, Cleveland, Conceptual Ground-Level View



**Figure 4. Tennessee Veterans' Home, Cleveland, Aerial Photograph**

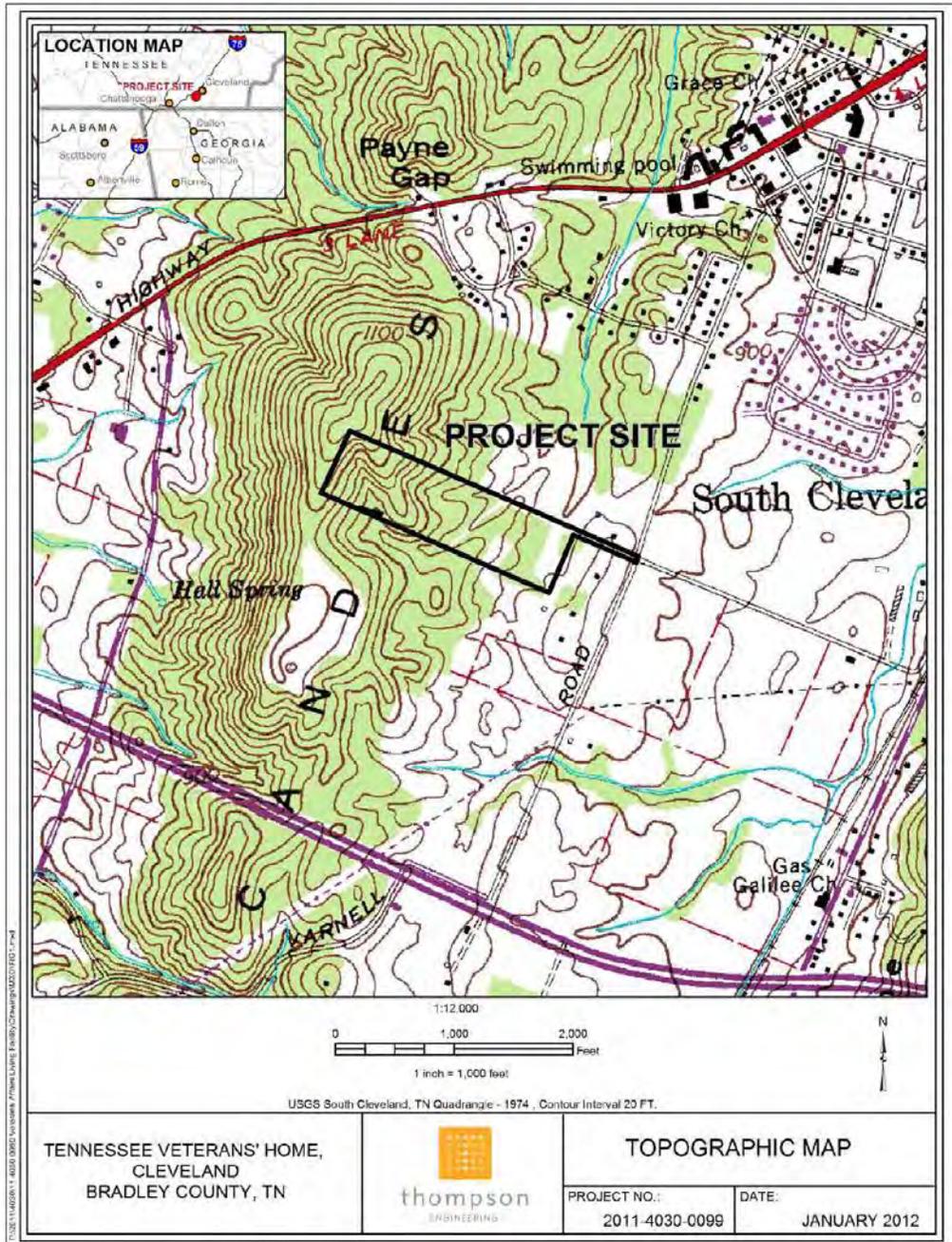


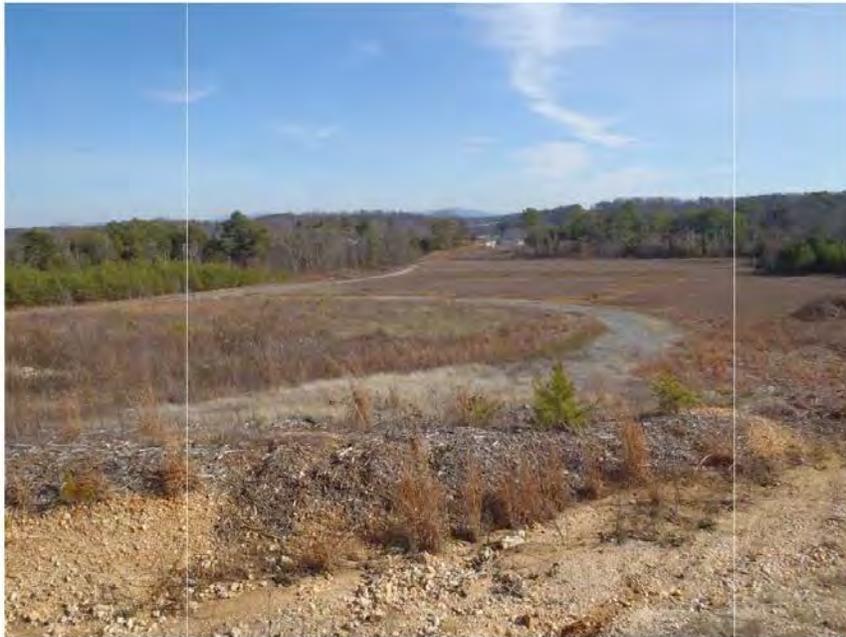
Figure 5. Tennessee Veterans' Home, Cleveland, Topographic Map



**Figure 6. Site Photo, View Looking West From Westland Drive**



**Figure 7. Site Photo, View Looking West From Southeast End of Site**



**Figure 8. Site Photo, Looking East From Center of Site**



**Figure 9. Site Photo, Looking East from West End of Site near Cell Tower**

March 1, 2012

**TRANSMITTED VIA EMAIL**

Mr. Michael J. Eubanks  
Senior Environmental Scientist  
Thompson Engineering, Inc.  
2970 Cottage Hills Road  
Suite 190  
Mobile, Alabama 36606

SUBJ: Environmental Assessment – Scoping Comments  
Department of Veterans Affairs  
Proposed Tennessee Veterans' Home  
Cleveland, Bradley County, Tennessee

Dear Mr. Eubanks:

I am in receipt of the Environmental Assessment (EA) Request for Information letter dated January 25, 2012, for a proposed Tennessee Veterans' Home in Cleveland, Bradley County, Tennessee. Under the proposed action, EPA understands that the Tennessee State Veterans' Home Board (TSVH) and the U.S. Department of Veterans Affairs (VA) would construct, operate, and maintain a new 108-bed veterans' home. The purpose of the proposed action is to offer intermediate and skilled levels of nursing care to provide a home for Tennessee veterans who are in need of long term care. Due to an increase in the number of veterans in Bradley County and surrounding counties, there is a need to provide an additional Tennessee veterans' home in this portion of the state. These types of homes provide professional nursing care, social services, and activities and rehabilitation services to veterans.

The letter and attachment include information on potential impacts to resources such as floodplains, water quality, wetlands, and historic properties. The site is located on an approximate 30-acre tract of donated property on Westland Drive, on the south side of Cleveland, Tennessee. The land was previously cleared and graded for a residential subdivision, but the project was not developed. The site currently resembles an open pasture-like habitat with a gravel road network and detention pond and a few patches of young trees. EPA offers the following comments and recommendations for development of the draft EA: Purpose & Need - The information provided in the information letter is adequate for purpose and need of the proposed project. An evaluation of the No Action Alternative should also be discussed in the draft EA.

Air Quality - Air quality concerns include the secondary impacts often associated with the site preparation and construction of buildings. A brief discussion of any air quality issues should be included in the draft EA. For a project of this type, EPA recommends that the project construction equipment include implementation of diesel emission reduction activities through various measures such as: switching to cleaner fuels, retrofitting current equipment with emission reduction technologies, exchanging older engines with newer cleaner engines, replacing older vehicles, and reducing idling through operator training and/or contracting policies.

Noise Impacts – The project should minimize noise impacts to any nearby residents during any site preparation and construction. Noise minimization strategies should be discussed in the draft EA.

Floodplains – The letter states that none of the 30-acre proposed site is within the 100-year floodplain. This should be documented in the draft EA.

Cultural Resources – The letter states that no historic properties exist on the site. It also states that a Phase 1A cultural resources survey will be conducted as part of the EA process and coordinated with the Tennessee Division of Archaeology. The results of this survey should be documented in the draft EA.

Water Quality - Consistent with Section 404 of the Clean Water Act, the selected site should avoid and minimize, to the maximum extent practicable, placement of fill into jurisdictional waters of the United States, which include wetlands and streams. The letter states that there are no wetlands on the proposed site. It also states that there are no streams on the proposed project site. This should be documented in the draft EA. Any planned construction, including the veterans' home facility and access road, should address any potential impacts to streams and waterways. The site grading, excavation, and construction plans should include implementable measures to prevent erosion and sediment runoff from the various project sites both during and after construction. Local land disturbance and state construction stormwater permit(s) may also be required, and these should be referenced on the plans and in the specifications.

Endangered Species – The draft EA should include information regarding any potential impacts to threatened or endangered species or habitat.

Cumulative Impacts - The draft EA should include a discussion of any (federal and non-federal) past, present, proposed and future (foreseeable within some 10-15 yrs) projects that are within the designated project area or that may affect that area (e.g., wetlands/water quality). Such project areas are often designated by logical geographic boundaries such as watersheds, or by other methods. The cumulative impact analysis can be important for even small projects if their proposed location is in an area that is already extensively developed.

Environmental Justice (EJ) – The environmental, socioeconomic and health related impacts to potential EJ populations should be evaluated in the draft EA. The demographics of the area should be documented in terms of the existence of minority and low-income populations. This description should include US Census data for the geographic unit(s) such as the Census Block Group(s) (BGs) encompassing the project area. At a minimum, the percentages of minority and low-income populations within these BGs should be documented and compared against other demographics of the area, as well as against the percentages of neighboring BGs, counties and the State of Tennessee. In addition, other demographic factors like population age, density, literacy, etc. may also be important to the overall assessment. Meaningful collaboration with the community can also help to identify whether any "pockets" (concentrations) of EJ communities exist within a BG that otherwise (as a whole) may have a relatively low percentage of minorities and low-income populations. EPA suggests coordination with local community leaders and groups in an effort to engage these communities in the scoping, assessment and project design process. The EA should include maps of the surrounding communities and indicate the proximity of communities with potential EJ concerns to the proposed project area.

Sustainability - Consider energy sustainable buildings utilizing variable forms of proven renewable energy applicable for this project, for example solar power for supplemental electricity and lighting in the parking lots. Please see attached link for additional info.

[http://www.wbdq.org/references/federal\\_mandates.php](http://www.wbdq.org/references/federal_mandates.php)

Public Involvement – The draft EA should include information on public involvement activities associated with the project.

Please forward a hard copy of your Draft Environmental Assessment to:

Environmental Protection Agency - Region 4  
Sam Nunn Atlanta Federal Center  
Attn: Ms. Madolyn Dominy, NEPA Program Office  
61 Forsyth Street, SW  
Atlanta, GA 30303

Thank you for the opportunity to provide you with this information. If you have any questions, please contact me.

Madolyn S. Dominy  
NEPA Program Office  
U.S. Environmental Protection Agency/ Region 4  
61 Forsyth Street, SW  
Atlanta, GA 30303-8960  
404-562-9644  
[dominy.madolyn@epa.gov](mailto:dominy.madolyn@epa.gov)

**From:** [Livingston, Rick - NRCS, Knoxville, TN](#)  
**To:** [Michael Eubanks](#)  
**Subject:** Environmental Assessment; Veterans Home; Bradley County, TN  
**Date:** Monday, January 30, 2012 6:08:14 AM

---

Michael,

Your request for information concerning the Environmental Assessment of the subject project was received at my office. We have already determined this site is exempt from the provisions of the Farmland Protection Policy Act. Additionally, you have already documented the fact that no "Hydric Soils" are mapped on the property. These two soil related concerns are both part of the Environmental Assessment/NEPA and are usually the extent of my contributions to the process.

Thanks for the opportunity to comment and thanks for the detailed information on the site. Don't hesitate to contact me if I may be of help anytime.

Sincerely,

**Rick Livingston**  
**USDA Natural Resources Conservation Service**  
**Resource Soil Scientist for East Tennessee**  
**9737 Cogdill Road; Suite 152C**  
**Knoxville, TN 37932**  
**Office: (865) 671-3830 x.112**  
**Cell: (865) 209-5479**



REPLY TO  
ATTENTION OF  
Regulatory Branch

**DEPARTMENT OF THE ARMY**  
NASHVILLE DISTRICT, CORPS OF ENGINEERS  
3701 BELL ROAD  
NASHVILLE, TENNESSEE 37214-2660  
January 30, 2012

SUBJECT: Reference No. 12-05E; Environmental Assessment, Tennessee Veterans' Home,  
Bradley County, Tennessee.

Mr. Michael J. Eubanks  
Thompson Engineering, Inc.  
2970 Cottage Hill Road, Suite 190  
Mobile, Alabama 36606

Dear Mr. Eubanks:

This is in regard to your January 25, 2012 letter concerning the subject project.

A review of the information provided indicates an activity that would not involve work in waters of the United States. **Therefore, a Department of the Army permit would not be required.**

We appreciate your awareness of our regulatory program. If you have any questions regarding this matter, please contact me at the above address, telephone (615) 369-7518 or email [deborah.t.tuck@usace.army.mil](mailto:deborah.t.tuck@usace.army.mil).

Sincerely,

Deborah T. Tuck  
Regulatory Specialist  
Regulatory Branch  
Operations Division



## United States Department of the Interior

FISH AND WILDLIFE SERVICE  
446 Neal Street  
Cookeville, TN 38501

February 15, 2012

Mr. Michael J. Eubanks  
Senior Environmental Scientist  
Thompson Engineering, Inc.  
2970 Cottage Hill Road, Suite 190  
Mobile, Alabama 36606

Subject: FWS #12-CPA-0286. Proposed Tennessee Veterans' Home, Cleveland, Bradley County, Tennessee.

Dear Mr. Eubanks:

Thank you for your correspondence of January 25, 2012, regarding 108-bed facility to be located on an approximately 30 acre tract of donated property on Westland Drive, in Cleveland, Bradley County, Tennessee. U.S. Fish and Wildlife Service (Service) personnel have reviewed the information submitted and we offer the following comments.

Information available to the Service does not indicate that wetlands exist in the vicinity of the proposed project. However, our wetland determination has been made in the absence of a field inspection and does not constitute a wetland delineation for the purposes of Section 404 of the Clean Water Act. The Corps of Engineers and Tennessee Department of Environment and Conservation should be contacted if other evidence, particularly that obtained during an on-site inspection, indicates the potential presence of wetlands.

Our database and the information provided indicates that suitable roosting habitat for the federally endangered Indiana bat (*Myotis sodalis*) may exist within the project area and would likely be altered by the proposed action. Habitat that is suitable for use by the species during summer includes trees, snags, and similar structures. Although the species has used trees smaller than five inches diameter at breast height, structure that is five inches and larger is considered adequate size at this time. The structure must have exfoliating bark, crevices, or other characteristics that would be considered by a person with sufficient experience (as recognized by the Fish and Wildlife Service) to provide adequate shelter for one or more bats. Caves, abandoned mines, and similar structures are not considered in this definition.

We recommend that disturbance of the suitable roosting habitat be avoided and minimized to the greatest extent possible. A qualified biologist should assess potential impacts and determine if the proposed project may affect Indiana bats. If this project involves Federal funding or a Federal permit, the lead Federal agency should submit a copy of your assessment and findings to this office for review and concurrence. A finding of "may affect" could require initiation of formal consultation by the lead Federal agency. If no Federal funding or Federal permit is involved, you may submit your assessment and findings directly to us.

Thank you for the opportunity to comment on this proposed action. If you have any questions regarding the information which we have provided, please contact Dave Pelren of my staff at 931/525-4974, or at [david\\_pelren@fws.gov](mailto:david_pelren@fws.gov).

Sincerely,

A handwritten signature in cursive script that reads "Mary E. Jennings".

Mary E. Jennings  
Field Supervisor



STATE OF TENNESSEE

DEPARTMENT OF ENVIRONMENT AND CONSERVATION

Division of Resource Management
Natural Heritage Program
7th Floor L&C Tower
401 Church Street
Nashville, Tennessee 37243
Phone 615/532-0431 Fax 615/532-0046

January 26, 2012

Michael Eubanks
Thompson Engineering, Inc.
270 Cottage Hill Road
Suite 190
Mobile, Alabama 36606

Subject: Tennessee Veterans Home, Department of Veterans Affairs
Cleveland, Bradley County, Tennessee
Rare Species Database Review

Dear Mr. Eubanks:

Thank you for your correspondence and map supporting an environmental review request for the Cleveland Tennessee Veterans Home proposed for 1940 Westland Drive Southwest in Bradley County, Tennessee.

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

Within four miles of the project, the following rare species have been observed:

Table with 8 columns: Type, Scientific Name, Common Name, Global Rank, St. Rank, Fed. Prot., St. Prot., Habitat. Rows include Tennessee Dace, Southern Prairie-dock, and Finelined Pocketbook.

Cleveland Tennessee Veterans Home, Bradley County, TN  
January 26, 2012  
Page 2

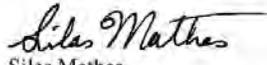
Based on the project description and photos showing the site as previously disturbed, we do not anticipate that rare plants will be impacted by this project. Should suitable habitat for rare animals exist on or immediately downstream of the site, we ask that project plans provide for the protection of the above listed rare animals. We ask that you contact the Tennessee Wildlife Resources Agency (Rob Todd, [rob.todd@tn.gov](mailto:rob.todd@tn.gov)) to ensure that legal requirements for protection of these animals are properly addressed. Additionally, we ask that you contact the US Fish and Wildlife Service, Cookeville Field Office (931-525-4970) to establish concerns for federally listed species, if you have not done so already.

For stabilization of disturbed areas, the Division of Resource Management advocates the use of native trees, shrubs, and warm season grasses, where practicable. Care should be taken to prevent re-vegetation of disturbed areas with plants listed by the Tennessee Exotic Pest Plant Council as harmful exotic plants.

Please keep in mind that not all areas of Tennessee have been surveyed and that a lack of records for any particular area is not a statement that rare species are absent from that area. For information regarding the protection status and ranks, please visit our website at <http://state.tn.us/environment/na>.

Thank you for considering Tennessee's rare species throughout the planning of this project. Should you have any questions, please do not hesitate to contact me at (615) 532-0440 or [silas.mathes@tn.gov](mailto:silas.mathes@tn.gov).

Sincerely,



Silas Mathes  
Heritage Data Manager



## TENNESSEE WILDLIFE RESOURCES AGENCY

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

January 26, 2012

Michael J. Eubanks  
Thompson Engineering  
2970 Cottage Hill Road  
Suite 190  
Mobile, AL 36606

Re: Environmental Assessment – Request for Information  
Department of Veterans Affairs  
Proposed Tennessee Veterans' Home, Cleveland  
1940 Westland Drive SW, Cleveland, Bradley County, Tennessee  
Project #47-014

Dear Mr. Eubanks:

The Tennessee Wildlife Resources Agency has reviewed the information that you provided regarding the proposed Veterans Home project in Bradley County, Tennessee which involves the construction of a 98,000 square foot facility consisting of a 108-bed facility on a 30-acre tract on donated property on Westland Drive in Cleveland. Your letter to us requested that we review the proposed project for potential impacts relative to the interests of our agency.

In our review of the proposed project we did not find any listed species under our authority or notice any listed species records near the project footprint. It is our opinion that the employment of best management practices to address erosion and sediment during construction will be sufficient to minimize potential impacts to all species under our authority due to the proposed project. We have no concerns or objection to the proposed project.

Thank you for the opportunity to review and comment on this proposed project. If you have further questions regarding this matter, please contact me at 615-781-6572.

Sincerely,

Robert M. Todd  
Fish and Wildlife Environmentalist

cc: Bobby Brown, Region III Habitat Biologist  
John Mayer, Region III Manager

**The State of Tennessee**

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**CHATTANOOGA ENVIRONMENTAL FIELD OFFICE**  
**TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION**  
540 McALLIE AVENUE, SUITE 550 - STATE OFFICE BUILDING  
CHATTANOOGA, TENNESSEE 37402  
(423) 634-5745 STATEWIDE 1-888-891-8332 FAX (423) 634-6389

January 26, 2012

Mr. Michael J. Eubanks  
Senior Environmental Scientist  
Thompson Engineering, Inc.  
2970 Cottage Hill Road, Suite 190  
Mobile, AL 36606

RE: Proposed Tennessee Veteran's Home, Cleveland – Bradley County, Tennessee

Dear Mr. Eubanks:

The Division of Underground Storage Tanks (Division) has received and reviewed the correspondence dated January 25, 2012, regarding the "Proposed Tennessee Veteran's Home, Cleveland" in Bradley County, Tennessee.

The Division is not presently aware of any conflicting issues, or environmental conditions, relative to the UST Program which might adversely affect the proposed development of the Tennessee Veteran's Home, Cleveland, Bradley County, Tennessee as referenced in the correspondence.

Should you have additional questions concerning this correspondence, please contact me at (423) 634-5737.

Sincerely,

*William Randy Slater*

William Randy Slater  
Field Office Manager  
Division of Underground Storage Tanks

c: Stanley R. Boyd, UST Division Director c/o Ernestine Ellis (e-copy)  
Mary N. Parkman, TDEC, Office of General Counsel (e-copy)  
Chattanooga EFO - Bradley County General File

Proposed Tennessee Veteran's Home, Cleveland - Bradley County 012612.doc



February 1, 2012

**TENNESSEE HISTORICAL COMMISSION**  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
2941 LEBANON ROAD  
NASHVILLE, TN 37243-0442  
(615) 532-1550

Mr. Michael L. Eubanks  
Thompson Engineers  
232 E. 11th. St./100  
Chattanooga, Tennessee, 37402

RE: VA, TENNESSEE VETERANS HOME, CLEVELAND, BRADLEY COUNTY

Dear Mr. Eubanks:

In response to your request, received on Monday, January 30, 2012, we have reviewed the documents you submitted regarding your proposed undertaking. Our review of and comment on your proposed undertaking are among the requirements of Section 106 of the National Historic Preservation Act. This Act requires federal agencies or applicant for federal assistance to consult with the appropriate State Historic Preservation Office before they carry out their proposed undertakings. The Advisory Council on Historic Preservation has codified procedures for carrying out Section 106 review in 36 CFR 800. You may wish to familiarize yourself with these procedures (Federal Register, December 12, 2000, pages 77698-77739) if you are unsure about the Section 106 process.

After considering the documents you submitted, we determine that THERE ARE NO NATIONAL REGISTER OF HISTORIC PLACES LISTED OR ELIGIBLE PROPERTIES AFFECTED BY THIS UNDERTAKING. We have made this determination either because: the undertaking will not alter any characteristics of an identified eligible or listed Historic Property that qualify the property for listing in the National Register, the undertaking will not alter an eligible Historic Property's location, setting or use, the specific location, scope and/or nature of the undertaking precluded affect to Historic Properties, the size and nature of the undertaking's area of potential effects precluded affect to Historic Properties, or, no National Register listed or eligible Historic Properties exist within the undertaking's area of potential effects. Therefore, we have no objections to your proceeding with your undertaking.

If your agency proposes any modifications in current project plans or discovers any archaeological remains during the ground disturbance or construction phase, please contact this office to determine what further action, if any, will be necessary to comply with Section 106 of the National Historic Preservation Act. If you are applying for federal funds, license or permit, you should submit this letter as evidence of consultation under Section 106 to the appropriate federal agency, which, in turn, should contact us as required by 36 CFR 800. If you represent a federal agency, you should submit a formal determination of eligibility and effect to us for comment. You may find additional information concerning the Section 106 process and the Tennessee SHPO's documentation requirements at <http://www.tennessee.gov/environment/hist/federal/sect106.shtm>. You may direct questions or comments to Joe Garrison (615) 532-1550-103. This office appreciates your cooperation.

Sincerely,

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

EPM/jyg

# City of Cleveland

CLEVELAND, TENNESSEE

## DEVELOPMENT AND ENGINEERING SERVICES



Brian Beck  
City Engineer  
[bbeck@cityofclevelandtn.com](mailto:bbeck@cityofclevelandtn.com)

185 Second Street N.E.  
P.O. Box 1519  
Cleveland, TN 37364-1519  
Phone (423) 559-3330  
Fax (423) 559-3373

February 24, 2012

Thompson Engineering  
Attention: Michael J. Eubanks  
2970 Cottage Hill Road  
Suite 190  
Mobile, AL 36606

Subject: Environmental Assessment – Request for Information – Bradley County/Cleveland, TN

Dear Mr. Eubanks,

Per the request in your letter dated January 25, 2012 to the City of Cleveland and other applicable agencies, I am not aware of any adverse impacts that this project will have as it relates to NEPA requirements.

Per your request, the following includes information on past experiences with this site and should be considered:

1. The condition of the 36" CMP that traverses across the property from south to north and located about 150' west of the east property line. Per the municipal code, no buildings can be constructed on top of drainage systems.
2. In 2004, the property owner located to the north of this site stated to city staff that construction materials were buried on site. The city required the property owner at that time (Steve Williams) to address this issue. Mr. Williams hired a geotech consultant (Tri-State Testing & Drilling-Chattanooga, TN) to investigate and they excavated test pits at different locations. I did not receive nor do I have a copy of the geotech correspondence/report, but it is my understanding that the geotech firm did not find buried material.
3. In the Winter 2004/2005, the previous property owner submitted plans to develop a residential subdivision on this property. The city turned over site plan review and permitting to the County since the large majority of the property is in the county.

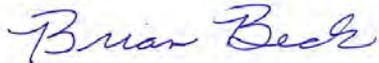
4. On January 18, 2006 and March 17, 2006 the previous owner was issue a TDEC Notice of Violation for inadequate sediment and erosion control measures and the resulting discharge of sediment into "waters of the State".

For current site development:

- A. The site entrance from Westland Drive will have to be evaluated to accommodate traffic and turning movements into the site. Improvements to Westland Drive at the entrance need to be considered.
- B. Meet stormwater quantity and quality requirements in accordance with the applicable ordinance.
- C. Obtain TDEC Notice of Coverage.
- D. Obtain applicable site plan approval and land disturbance permitting.

If you have any questions or comments, don't hesitate to contact me at 423-479-1913.

Sincerely,



Brian Beck, PE  
City Engineer

CC: Jonathon Jobe, Development & Engineering Services Director

## **Appendix C**

### **List of Environmental Permits/Modifications Required**

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At this planning stage for the proposed Tennessee Veterans' Home, Cleveland the only required environmental permits would be the local construction permits and stormwater permits. If during the course of coordination of the Draft Environmental Assessment or during the more detailed design other environmental permits or project modifications are determined necessary in order to complete with appropriate federal, state, and local environmental laws and regulations they would be obtained by the county or the appropriate agent for the VA.

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